

**Ferrel, Mimi**

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**From:** Leah Pressman [REDACTED]  
**Sent:** Monday, June 14, 2021 3:37 PM  
**To:** Public Comment at Culver City; Fisch, Alex; Yasmine Imani-McMorrin; Vera, Albert; Eriksson, Goran; Lee, Daniel  
**Subject:** Public Hearing on June 17th - Oil and Gas Extraction /report of the subcommittee

In the August 2020 city council meeting during which ending oil drilling was discussed, there were many comments about whether or not the city might get sued for seeking to shut down the Culver City portion of the oil field.

My cousin Dr. Ben Santer has been on the front lines of fighting climate change in the face of enormous personal consequences for himself and his family. I hope he is an inspiration for all of you on the council as he has been for me, a model of how to stand up boldly in the fight to save our species.

I want to personally thank all the city council members who have been engaged in shutting down the oil field for their work on this.

Your constituent, Leah Pressman

[https://www.huffpost.com/entry/santer-koonin-climate\\_n\\_60ad529fe4b0a24c4f821f58](https://www.huffpost.com/entry/santer-koonin-climate_n_60ad529fe4b0a24c4f821f58)

<https://billmoyers.com/2014/05/16/the-relentless-attack-of-climate-scientist-ben-santer/>

----- Forwarded Message -----

**From:** Leah Pressman [REDACTED]  
**To:** Benjamin D. Santer <santer1@lInl.gov>  
**Sent:** Monday, June 14, 2021, 03:15:22 PM PDT  
**Subject:** Re: Draft of statement for Culver City Council Meeting on June 17

On Monday, June 14, 2021, 02:07:50 PM PDT, Benjamin D. Santer <santer1@lInl.gov> wrote:

\*Ben Santer's Statement for Culver City Council Meeting on June 17\*

My name is Dr. Ben Santer. I am Leah Pressman's cousin. I'm also a MacArthur Fellow and a member of the U.S. National Academy of Sciences. I've worked at Lawrence Livermore National Lab in California for 29 years. My job is to study the causes of climate change.

Back in 1995, I was Lead Author of a key chapter in a report by the Intergovernmental Panel on Climate Change. After years of work, a team of U.S. and international scientists concluded that: "the balance of evidence suggests a discernible human influence on global climate".

These 12 words changed the world. A global warming signal had been identified and attributed to human influence. The most important human influence was the increase in atmospheric greenhouse gas levels caused by burning fossil fuels.

Since 1995, human influence on climate has become much clearer. Human "fingerprints" are identifiable in warming of the oceans and land

surface, in changing rainfall patterns, in declining Arctic sea ice extent, in sea level rise, in extreme heat, and in many other aspects of Earth's climate. If these changes are allowed to proceed unchecked, future generations will grow up in a world with a very different climate from that of today. Our children and grandchildren will inherit climate debt they did nothing to incur. I don't want to see that happen. I'm sure you don't either.

Avoiding dangerous levels of warming will require transitioning from fossil fuels to cheap and efficient low-carbon energy. Making this transition is the challenge of our generation. Human-caused planetary warming happened on our watch. We must be part of the solution to this problem.

Meaningful solutions must involve local actions. Local action to reduce emissions of heat-trapping greenhouse gases paves the way for effective state, national, and international action. Leadership has to start somewhere.

Today, leadership could and should start here - with members of the Culver City Council. I respectfully request that you take the decision to phase out oil and gas production at the Inglewood Oil Field. Doing so would send a powerful signal, a signal reaching far beyond the boundaries of Culver City. The signal would be clear. It's time for meaningful actions to reduce climate change risks.

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Benjamin D. Santer  
Program for Climate Model Diagnosis and Intercomparison  
Lawrence Livermore National Laboratory  
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Livermore, CA 94550, U.S.A.  
Tel: (925) 422-3840  
FAX: (925) 422-7675  
email: [santer1@llnl.gov](mailto:santer1@llnl.gov)

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## Ferrel, Mimi

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**From:** Olason, Kyle <kyle.olason@championx.com>  
**Sent:** Wednesday, June 16, 2021 6:45 AM  
**To:** Public Comment at Culver City  
**Cc:** Leach, Charles; rock@cipa.org; Watson, Ray  
**Subject:** Culver City Council Meeting - Opposition of Ordinance Presented

**Importance:** High

Hello-

My name is Kyle Olason and I am writing to make my voice heard as it pertains to an ordinance that is scheduled to be discussed in the council meeting this Thursday, June 17<sup>th</sup>.

I am unable to attend in person to share comments publicly due to a family obligation, so I am writing an email instead.

My family and I oppose any such ordinance that hampers and unjustly deteriorates the business of Sentinel Peak Resources and their associated contractors. This is a ploy to harm the oil and gas industry as a whole and in the state of California. Many people are unaware, nor do they wish to believe it, but oil and gas in this great state employs thousands of people and generates incredible revenue. I am one of these workers and know hundreds of others who also support their families with their hard work in these fields.

**The oil and gas industry contributes 590 jobs to Culver City, \$121 million in gross regional product and \$5.7 million to the City's general fund, approximately 4.5% of its budget.**

Please note my comments and sense our urgency in voicing our opposition. My coworkers and I love our jobs. We support our families with these jobs. As do many others. Please do not hamper our ability to make a living simply to comply with the far left progressive agenda to "rid our state of certain industries" when those same industries make our society run, function and flourish.

Thank you,

**Kyle Olason**

Account Manager – 0V138

**ChampionX**

Los Angeles Basin, CA

**M** 360-306-0177 **E** [kyle.olason@championx.com](mailto:kyle.olason@championx.com)

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## Ferrel, Mimi

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**From:** Leach, Charles <charles.leach@championx.com>  
**Sent:** Wednesday, June 16, 2021 7:57 AM  
**To:** Public Comment at Culver City  
**Cc:** rock@cipa.org; Olason, Kyle; Watson, Ray  
**Subject:** Culver City Council Meeting - Opposition of Ordinance Presented for 06.17.21

Hello,

My name is Charles Leach and I am sending this email to make my voice heard for the ordinance being discussed in the council meeting taking place tomorrow, June 17<sup>th</sup>.

My family and I depend on the existence of the Inglewood oil field for our income and livelihood. We oppose any ordinance that aims to shut down a part of an industry that California's energy grid and citizens depend on daily. California already does not produce enough oil to support its large population and it does not seem logical to decrease our oil and gas production domestically to depend on importing more oil from across the pacific in giant tankers from other oil and gas producing countries.

On top of this issue, the oil and gas industry contributes 590 jobs to Culver City, \$121 million in gross regional product and \$5.7 million to the City's general fund (approximately 4.5% of its budget). Furthermore, the current unemployment rate of Los Angeles County is 11.7% compared to 8.3% for the state and 6.1% for the United States as a whole. This ordinance would only increase the unemployment rate that is already almost twice the national average.

Thank you,

**Charles Leach**  
District Representative

**ChampionX**  
Los Angeles Basin, California  
United States of America  
**M** +1.213.434.3608 **E** [charles.leach@ChampionX.com](mailto:charles.leach@ChampionX.com)

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**Ferrel, Mimi**

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**From:** Annette H. Tijerina <atijerina@laocbuildingtrades.org>  
**Sent:** Wednesday, June 16, 2021 12:05 PM  
**To:** Fisch, Alex  
**Cc:** Ron Miller; Clerk, City  
**Subject:** Zoning Code Amendment P2021-00360ZCA  
**Attachments:** Culver City\_Zoning Code Amendment\_P2021-0036-ZCA.pdf

**Sensitivity:** Confidential

To Mayor Alex Fisch and/or to whom it may Concern:

Please accept the attached correspondence for the above-referenced Amendment to be heard at the Culver City Council Meeting – Thursday, June 17, 2021

If you should have any questions regarding same, please contact Ron at the Council office (213) 483-3222.

Best,



Annette H  
Tijerina  
Executive Assistant



LA/OC Building Trades Council  
1626 Beverly Blvd.  
Los Angeles, CA 90026

213-483-4222  
[atijerina@laocbuildingtrades.org](mailto:atijerina@laocbuildingtrades.org)



**RON MILLER**  
Executive Secretary

# Los Angeles / Orange Counties Building and Construction Trades Council

Affiliated with the Building & Construction Trades Dept., AFL-CIO

1626 Beverly Boulevard  
Los Angeles, CA 90026-5784  
Phone (213) 483-4222  
(714) 827-6791  
Fax (213) 483-4419



June 15, 2021

Alex Fisch, Mayor  
City of Culver City  
9770 Culver Blvd.  
Culver City, CA. 90232

Dear Mayor Alex Fisch,

The Los Angeles/Orange Counties Building and Construction Trades Council writes in STRONG OPPOSITION to ZONING CODE AMENDMENT, P2021-0036-ZCA, agendized for Thursday, June 17, 2021, and urges the Culver City Council to delay action on this item to allow for further negotiations with the companies impacted by this policy change.

The Building Trades acknowledge that the Culver City Council wants to begin the process of transitioning away from fossil fuels to cleaner sources of energy. We are actively in conversation with the California Legislature about this very issue and want to ensure that any transitions under consideration do not adversely impact or displace our members that work on oil and gas sites.

We represent working men and women, and our priority is to protect their livelihood, which begins with their access to employment. It is our preference that Just Transition conversations take place at the state level instead of multiple cities engaging in a patchwork of different ordinance that are incongruent with each other. A statewide framework will ensure continuity and that resources are available to help our workers re-skill and retrain for the jobs of the future.

We DO NOT believe that the impacts of climate change should be ignored or shelved simply because of economics. However, we also believe in responsible, environmental stewardship, that is sensitive to the needs of working people and the current proposal provides no analysis of transitioning workers impacted by the proposed ordinance.

We would like to collaborate with you toward this goal and our understanding is that impacted entities are also hopeful to resume conversations in hopes of reaching a settlement. **We encourage the Culver City Council to delay action on this item and engage in discussions with the Building Trades and all other stakeholders in hopes that we might reach some agreement on the mechanics of this transition within the next 60 days.**

Respectfully,

Ron Miller  
Executive Secretary

## Ferrel, Mimi

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**From:** Watson, Ray <raymond.watson@championx.com>  
**Sent:** Wednesday, June 16, 2021 1:58 PM  
**To:** Public Comment at Culver City  
**Subject:** Comment AGAINST Proposed Culver City Ordinance to Make Oil Operations a Nonconforming Activity

Please enter into the record these comments AGAINST proposed Culver City ordinance to make oil operations a nonconforming activity within city limits and phase out over a five-year period (by July 28, 2026) the operations, closure, and removal of nonconforming oil and gas activities within Culver City, including the Culver City portion of the Inglewood Oil Field.

As a California citizen, member of the Oil & Gas industry, and an environmentalist, I respectfully ask the Culver City Council to vote AGAINST this ordinance. It does not accomplish any of the perceived goals of the extremists who champion misguided efforts to stop California oil & gas production.

- Extremists believe this effort will lower the earth's carbon footprint: IT WILL NOT LOWER THE EARTH'S CARBON FOOTPRINT. This California oil, produced under the world's most stringent environmental regulations and standards has a far smaller carbon footprint than the oil that we would import to replace it. CALIFORNIA CURRENTLY IMPORTS OVER 60% OF OUR CITIZENS' DAILY OIL NEEDS. As long as our demand for oil in California remains higher than our local supply, we should be producing as much oil in California as we can. We have the reserves and the know-how to meet ALL of California's oil demand safely and environmentally responsibly.
- Extremists believe it will make the air cleaner: IT WILL NOT MAKE THE AIR CLEANER. The tankers that currently bring Imported oil to the ports of Long Beach and Los Angeles burn the dirtiest fuel refined from petroleum products. The daily backup of these vessels in our local ports create emissions equivalent to thousands of additional vehicles per day on our freeways. THIS ORDINANCE WILL INCREASE OIL IMPORTS.
- Extremists believe the ordinance will be a benefit to economically disadvantaged communities: IT WILL NOT BENEFIT ECONOMICALLY DISADVANTAGED COMMUNITIES. Oil operations in Culver city pose far fewer risks to the welfare of poor communities than the millions of automobiles traveling the LA Basin freeways daily. Oil & gas industry tax dollars and jobs help drive the local economy. Poor communities suffer disproportionately when economic opportunity is stifled and public services are curtailed. This is what will occur if this ordinance is passed.

Thank you for allowing me to register my position.

**Ray Watson**  
Strategic Account Manager

**ChampionX**  
9201 Camino Media, Suite 130, Bakersfield, CA 93311  
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## Ferrel, Mimi

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**From:** Ernesto Pantoja <EPantoja@local300.com>  
**Sent:** Wednesday, June 16, 2021 4:15 PM  
**To:** Fisch, Alex  
**Cc:** Public Comment at Culver City; Clerk, City  
**Subject:** FW: LIUNA Local 300 Opp Letter PH-1  
**Attachments:** LIUNA Opposition Letter.pdf

**Importance:** High

Good Afternoon Mayor Fisch,

I am sending you this letter on behalf of Sergio Rascon Business Manager of LIUNA Local 300, in opposition to item PH-1 which is scheduled to be discussed at tomorrow's Special Meeting of the City Council's. If you have any questions please feel free to contact us at 213-385-3550.

Thank you!

Best,

Ernesto





SERGIO RASCÓN  
Business Manager

LUIS R. ROBLES  
Secretary Treasurer

JAVIER NUÑEZ  
President

TONY E. OLEA III  
Vice President

RICARDO ANDRADE  
Recording Secretary

FRANCISCO ARRIZON  
Executive Board

DELFINO DE LA CRUZ  
Executive Board

2005 W. Pico Blvd.  
Los Angeles, CA 90006

Phone 213-385-3550  
Fax 213-385-6985

[www.local300.com](http://www.local300.com)

# LIUNA! Local 300

June 16, 2021

The Honorable Alex Fisch  
Mayor, Culver City  
*[TRANSMITTED VIA EMAIL]*

Your Honor,

The Laborer's International Union of North America (LIUNA) Local 300 must oppose your zoning code amendment (P2021-0036-ZCA) at the Special Meeting of the City Council on this Thursday evening. Our members are the Angelenos who work in oil field operations. They are safety inspectors, pipeline installers, maintenance workers, construction workers, and security personnel who balance the safety and productivity of petroleum and natural gas extraction. Adoption of this amendment as drafted assumes that our members will find other living wage, family sustaining employment beginning in July 2021. **We must urge the Council to consider delaying a vote at Thursday's Special Meeting.**

Our members are the most racially and gender diverse of the high wage construction fields and yet still the lowest paid. None of our work is minimum wage. Our members earn prevailing wages. When our members work on projects, they bring the highest standards of training and safety precautions to the worksite. During economic distress, this union ensures that each member is able to keep secure employment or find suitable alternatives and never suffer economic insecurity.

The overwhelming proportion of wages earned support men and women in the Los Angeles area who lead Latino immigrant families and African American households. Our brothers and sisters may not have finished high school nor had the easiest path to adulthood. Some committed mistakes in their past, were incarcerated, and now lead their families as breadwinners. A good many persons who we are privileged to count as members have been at the margins of society, without adequate supports to survive until stable employment provided opportunity.

Construction tradespersons were deemed essential across this state during the pandemic. Our employers and their clients have kept us working and largely safe while low-wage service workers were stretched thin, left without personal protective equipment, and put in harm's way while not having adequate healthcare.

## Feel the Power

Our members, by virtue of collectively bargained wages, benefits, and fair work rules have been able to hold on to a portion of the California dream. The perspectives of the hundreds of oil field workers, small businesses, and contractors at the Inglewood Hills Oil Field are critical to the discussion about the zoning amendment being considered.

We acknowledge that not every commercial activity is welcome in every community. We also understand that the City has invested a great deal of its energy in trying to end oil and gas production. Our members deserve better than elimination of their livelihoods as envisioned in the current proposal. **LIUNA Local 300 believes that a compromise can be achieved that balances the many concerns at this site only if a vote on the amendment is delayed.**

In Solidarity,

A handwritten signature in blue ink that reads "Sergio Racon". The signature is fluid and cursive, with the first name being more prominent.

Sergio Racon  
Business Manager  
LIUNA Local 300

President  
Southern California District Council of Laborers

LIUNA Vice President-At-Large

## Ferrel, Mimi

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**From:** McGrath, David <DLMcGrath@manatt.com>  
**Sent:** Wednesday, June 16, 2021 5:10 PM  
**To:** Public Comment at Culver City  
**Cc:** Moyer, Craig; Waggener, Sigrid  
**Subject:** Public Comments to 6/17/21 Culver City Council Hearing Agenda Item 21-1108  
**Attachments:** 2021-06-16 CIPA Comments on Item 21-1108 (6.17.21 Council Hearing).pdf

On behalf of the California Independent Petroleum Association, attached please find a comment letter from Craig Moyer for the June 17, 2021 City Council Hearing Agenda Item No. 21-1108.

Sincerely,

**David McGrath**  
Associate

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**Manatt, Phelps & Phillips, LLP**  
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June 16, 2021

Client-Matter: 23362-030

## VIA E-MAIL

Honorable Councilmembers  
City Council of Culver City  
9770 Culver Blvd.  
Culver City, CA 90232  
[public.comment@culvercity.org](mailto:public.comment@culvercity.org)

***Re: June 17, 2021 City Council Hearing Agenda Item No. 21-1108, Zoning Code Amendment P2021-0036-ZCA to Modify Zoning Code Section 17.610.010.D***

Dear Honorable Councilmembers:

The California Independent Petroleum Association (“CIPA”) appreciates the opportunity to submit these comments concerning the critical legal and policy issues raised by Council Item No. 21-1108’s proposal to modify Culver City Zoning Code Section 17.610.010.D (the “Proposed Amendments”). To put it simply, the Proposed Amendments will unlawfully and unreasonably terminate all oil and gas operations in Culver City’s portion of the Inglewood Oil Field, depriving property owners of their vested development and property rights.

CIPA is a non-profit, non-partisan trade association representing approximately 500 independent oil and natural gas producers, royalty owners, and service and supply companies throughout the state of California, including CIPA member Sentinel Peak Resources California LLC (“Sentinel Peak”) that operates the Inglewood Oil Field. CIPA joins in Sentinel Peak’s comments concerning the Proposed Amendments.

### **A. The Proposed Amendments Violate Established Principles of Vested Rights and Constitute an Unlawful Taking without Compensation**

The Proposed Amendments constitute an unlawful violation of operators’ vested rights to extract oil and gas minerals in the Inglewood Oil Field. While the City attempts to rely on a flawed study to justify the Proposed Amendments’ unreasonable and arbitrary five-year amortization period to terminate operations, the City has repeatedly failed to consider the very nature of oil and gas operations. The extraction of minerals such as oil and gas require, from time to time over a long operational life, expansion of those uses. Established principles of law protect these vested rights under the diminishing asset doctrine.



CIPA once again directs the City to the relevant legal authority concerning a vested right to extract minerals under the diminishing asset doctrine – *Hansen Brothers Enterprises v. Board of Supervisors* (1996) 12 Cal.4th 533. In *Hansen*, the Supreme Court of California explained that mineral extraction operations require the expansion of extraction activities into other areas that were not being exploited at the time when a subsequent zoning change was proposed. More specifically, *Hansen* provides:

The very nature and use of an extractive business contemplates the continuance of such use of the entire parcel of land as a whole, without limitation or restriction to the immediate area excavated at the time the ordinance was passed. A mineral extractive operation is susceptible of use and has value only in the place where the resources are found, and once the minerals are extracted it cannot again be used for that purpose.

(*Hansen*, 12 Cal.4th at 553-554.)

Simply put, oil and gas operations require that wells and facilities be relocated, redrilled, and deepened from time to time over the course of many, many years because oil and gas minerals constitute diminishing assets, requiring that facilities be reworked to access reserves as they become depleted at various locations.<sup>1</sup> There is no case law holding that principles of amortization apply to eliminate a diminishing asset – nor has the City sufficiently considered this issue (as Sentinel Peak has pointed out on several occasions).

The Proposed Amendments unreasonably and unconstitutionally interfere with the vested rights of producers to continue the development and production of oil and gas resources in the Inglewood Oil Field, representing a taking of property without compensation. The City’s attempt to safeguard itself from these fundamental legal problems by relying on an arbitrary five-year amortization period will not shield it from valid claims under the Takings Clauses found in both the Federal and California Constitutions.

## **B. Many Provisions of the Proposed Amendments Are Preempted by State and Federal Regulations**

Under California law, “[a] county or city may make and enforce within its limits all local, police, sanitary, and other ordinances and regulations not in conflict with general laws.” (Cal. Const, art. XI, § 7.) However, “[i]f otherwise valid local legislation conflicts with state law, it is preempted by such law and is void.” (*Sherwin-Williams Co. v. City of Los Angeles* (1993) 4 Cal.4th 893, 897, citing *Candid Enterprises, Inc. v. Grossmont Union High School Dist.* (1985) 39 Cal.3d 878, 885.) Local legislation conflicts with state law where it “duplicates, contradicts,

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<sup>1</sup> The Proposed Amendments would shockingly eliminate these very activities after July 28, 2021. (See Proposed Amendments, § 17.610.010.D.)

or enters an area fully occupied by general law, either expressly or by legislative implication.” (*Ibid.*) Local legislation is “duplicative” when it is coextensive of state law. (*Ibid.*) And local law is contradictory where it obstructs or harms state law. (*Id.* at p. 898.) Finally, local legislation enters an area that is “fully occupied” by state law when the legislature expressly or impliedly manifested intent to occupy the area. (*Ibid*; *see also Candid Enterprises, Inc., supra*, 39 Cal.3d at 885.)

The regulatory processes in the Proposed Amendments are preempted by state and federal law. Consistent with its strong interest in oil and gas resources and its intent to maximize the “wise development of oil and gas resources,” California has adopted numerous statutes and regulations that comprehensively regulate virtually all aspects of oil and gas operations, including in particular all downhole activities. (*See e.g.*, Pub. Resources Code, § 3106(d).) The state has vested complete authority in CalGEM<sup>2</sup> to “supervise the drilling, operations, maintenance, and abandonment of wells so as to permit owners or operators of wells to utilize all methods and practices known to the oil industry for the purpose of increasing the ultimate recovery of underground hydrocarbons and which, in the opinion of the supervisor, are suitable for this purpose in each proposed case.” (Pub. Resources Code, § 3106(b).) Further expressing the explicit policy of the state, section 3106(b) provides:

To further the elimination of waste by increasing the recovery of underground hydrocarbons, ***it is hereby declared as a policy of this state that the grant in an oil and gas lease or contract to a lessee or operator of the right or power, in substance, to explore for and remove all hydrocarbons from any lands in the state*** ... is deemed to allow the lessee or contractor ... to do what a prudent operator using reasonable diligence would do . . . including, but not limited to, the injection of air, gas, water, or other fluids into the productive strata, the application of pressure heat or other means for the reduction of viscosity of the hydrocarbons, the supplying of additional motive force, or the creating of enlarged or new channels for the underground movement of hydrocarbons into production wells, when these methods or processes employed have been approved by the supervisor.

(*Id.*) (Emphasis added).

The specific statutory provisions regulating oil and gas operations are contained within, *inter alia*, Division 3 of the Public Resources Code, encompassing sections 3100 through 3865. These statutes address all aspects of oil and gas exploration and extraction in detail, including notice of intent to drill and abandon (§§ 3203, 3229); bonding (§§ 3204-3207); abandonment (§ 3208); recordkeeping (§§ 3210-3216); blowout prevention (§ 3219); use of well casing to prevent water pollution (§ 3220); protection of water supplies (§§ 3222, 3228); repairs (§ 3225);

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<sup>2</sup> “CalGEM” means and refers to the California Geologic Energy Management Division.

regulation of production facilities (§ 3270); waste of gas (§§ 3300-3314); subsidence (§§ 3315-3347); spacing of wells (§§ 3600-3609); unit operations (§§ 3635-3690); and regulation of oil sumps (§§ 3780-3787). By and through this all-encompassing statutory and regulatory scheme, the California legislature has manifested its intent to fully occupy the field of oil and gas operations, methods, and procedures to the exclusion of local legislation.

Indeed, the California Attorney General has recognized the preemptive effect of state oil and gas laws for more than 40 years: Where there is state regulation of oil, gas and geothermal resources well drilling and production activities for the purpose of conserving and protecting those resources, such state regulation has preempted certain phases of such activity. Particularly, ***where the state regulation approves of or specifies plans*** of operation, methods, materials, procedures, or equipment to be used by the well operator ***or where activities are to be carried out under the direction of the Supervisor, there is no room for local regulation.*** (59 Ops. Cal. Atty. Gen. 461, 462 (1976), emphasis added.) The Attorney General opinion went on to caveat that not every aspect of local control relating to oil and gas operations had been preempted at the time, and that certain local regulations could be tolerated (at that time) where they (1) did not intrude on an area fully regulated by the state; and (2) were not inconsistent with the state's regulations. (*Ibid.*) But the Attorney General concluded: “Where the statutory scheme or Supervisor specifies a particular method, material or procedure by a general rule or regulation or gives approval to a plan of action with respect to a particular well or field or approves a transaction at a specified well or field, it is difficult to see how there can be any room for local regulation.” (*Id.* at p. 478; *see also Suter v. City of Lafayette* (1997) 57 Cal.App.4th 1109, 1125 [where states “expressly permits operation under a certain set of standards, it implies that the specified standards are exclusive”].)

Finally, the City should consider Monterey County's failed attempt at regulating preempted oil and gas issues. In its adoption of Measure Z, which sought to regulate down-hole oil and gas operations despite having no jurisdiction or authority to do so, Monterey County was found to have entered a preempted field. Measure Z's preempted policies were overturned.

### **C. Eliminating Oil and Gas Operations in the Inglewood Oil Field Will Adversely Impact the City's and County's Economy**

The oil and gas industry provides significant and impactful benefits to Culver City, Los Angeles County, and the State of California. As Sentinel Peak explained to the City in October 2020, the oil and gas industry contributes 590 jobs to Culver City, \$121 million in gross regional product and \$5.7 million to the City's general fund, approximately 4.5% of the City's budget.<sup>3</sup> Sentinel Peak itself donates over \$100,000 per year to local non-profit organizations, in addition

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<sup>3</sup> See “Contributions of the Oil and Gas Industry to Los Angeles County, Capitol Matrix Consulting” (June 2020), at 19-20 (available at: <https://www.wspa.org/wp-content/uploads/Oil-and-Gas-Industry-Contributions-to-LA-County-.pdf>).

to providing excellent, well-paying jobs for its hard-working employees while supporting the living incomes of mineral rights owners (many of whom are retired senior citizens). We encourage the Councilmembers to review the 2019 report issued by the Los Angeles County Economic Development Corporation that explains the significant contributions made by the oil and gas industry to the California economy, including substantial employment for a diverse workforce and employment opportunities that provide upward mobility.<sup>4</sup>

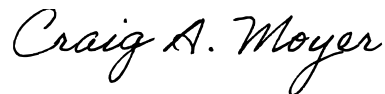
## **D. The Importance of Domestic Oil Production**

The City's action ignores a simple reality. Oil and gas production in California is performed under the most strict statutory and regulatory scheme in the world, which ensures protection of the environment and human health, including surrounding communities and employees. Production in Culver City means that there is less importation of foreign oil produced under far less stringent controls and less travel for the locally-produced product.

## **E. The Proposed Amendments Will Result in Costly Litigation**

Should the City elect to proceed with these Proposed Amendments, industry stakeholders will be left with no choice but to seek judicial recourse to protect their property rights. Moreover, even if the City ultimately prevails in court, defending multiple judicial actions will cost the City hundreds of thousands of dollars, if not millions. If the City does not ultimately prevail, the City will incur costs that that will easily exceed several million dollars. A reviewing court will closely consider all decisional law relating to vested rights, in particular those decisions that concern mineral extraction. Finally, a reviewing court will necessarily examine the entire administrative record before it and see that just one use classification, oil and gas extraction and production, was singled out for disparate, adverse treatment. We therefore again urge the City to reject the Proposed Amendments.

Sincerely,



Craig A. Moyer

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<sup>4</sup> See "Oil & Gas in California: The Industry, Its Economic Contribution and User Industries at Risk" (2019) (available at: <https://laedc.org/2019/08/27/oil-and-gas-industry-in-california-2019-report/>).

**Ferrel, Mimi**

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**From:** noreply@granicusideas.com  
**Sent:** Wednesday, June 16, 2021 7:12 PM  
**To:** Public Comment at Culver City  
**Subject:** New eComment for City Council Meeting Agenda on 2021-06-17 6:00 PM - Special Meeting



## New eComment for City Council Meeting Agenda on 2021-06-17 6:00 PM - Special Meeting

Cynthia Hart submitted a new eComment.

Meeting: City Council Meeting Agenda on 2021-06-17 6:00 PM - Special Meeting

Item: PUBLIC HEARINGS

eComment: I live in the Inglewood Oil Field impact zone, and I strongly support an end to oil drilling in our community. Please act to protect the health, safety and well-being of Culver City residents. It has always seemed kind of insane to have oil drilling in an earthquake zone and so close to where people live, work and play.

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## Ferrel, Mimi

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**From:** KW Tulloss [REDACTED]  
**Sent:** Wednesday, June 16, 2021 9:07 PM  
**To:** Fisch, Alex; Public Comment at Culver City; Clerk, City  
**Cc:** Tulloss, KW  
**Subject:** Letter to Culver City  
**Attachments:** BMC Culver City letter .pdf



# Baptist Ministers Conference of Los Angeles and Southern California

4269 South Figueroa Street, Los Angeles California 90037  
Office of the President

June 15, 2021

Alex Fisch, Mayor  
City of Culver City  
9770 Culver Blvd.  
Culver City, CA. 90232

Dear Mayor Fisch,

We at the Baptist Ministers Conference, Southern Christian Leadership Conference, and National Action Network have been on the forefront of fighting for civil rights for a long time.

It has come to our attention that workers at the Inglewood Oil Fields could be forced out of their positions of employment by an ordinance you are considering this Thursday. We would like you to take several points into consideration:

1. Most workers will not have an ability to upskill or transition to jobs paying a living wage in five years. Attending night school, taking college courses, and other career transitions cannot reasonably occur in five years without leaving many workers behind, especially those who must work multiple jobs to make ends meet.
2. What assistance is the City of Culver City offering to impacted workers? If the workers are not receiving any assistance from this effort, we are failing our most vulnerable. We cannot rejoice over the closure of a particular set of jobs if it heightens the risk that our brothers and sisters struggle economically and are more likely to have an encounter with our justice system. Are you requiring or can you require the company to assist with this transition?
3. Have you considered transitioning areas of the oilfields in phases to leverage private dollars to do brownfield cleanup, or are you simply going to leave the oilfield as blight without a well-conceived pathway to rejuvenate it?
4. Could you reach an agreement with the oil companies to facilitate a multi-phase just transition that brings in additional tax revenue to conduct Brownfield cleanup or mitigate environmental impacts? We are familiar with the adage of "Taxes are the price we pay for civilized society."

These issues concern us and we are alarmed that this ordinance may be full of ideology but lack practical solutions for transitioning workers into safe economic spaces and transitioning the underlying land use into a clean, safe, and rejuvenative space.

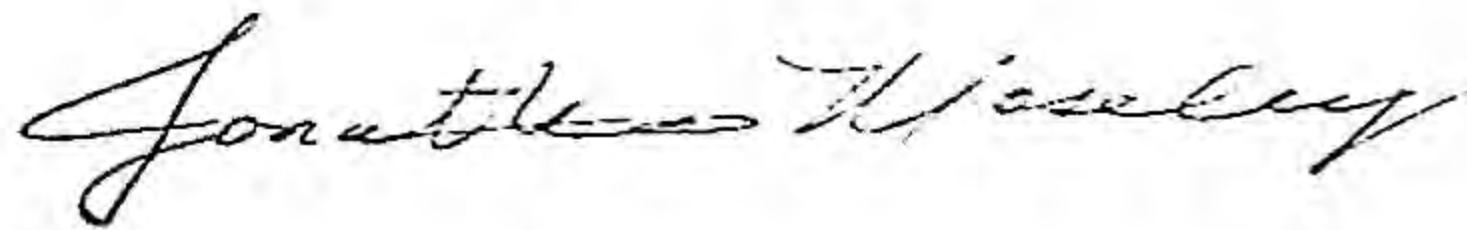


We are respectfully asking that you push this vote back until you have more closely studied how to help working people with a bridge to other opportunities prior to voting on this measure.

Respectfully,

Rev. K.W. Tulloss 

Reverend K.W. Tulloss  
President, Baptist Ministers Conferences of Los  
Angeles & Southern California



Rev. Jonathan Mosley  
Western Regional Director, National Action  
Network

*Pastor William D. Smart /S/*  
Pastor William D. Smart  
President, CEO Southern Christian Leadership  
Conference of Southern California



**From:** noreply@granicusideas.com  
**Sent:** Thursday, June 17, 2021 12:52 AM  
**To:** Public Comment at Culver City  
**Subject:** New eComment for City Council Meeting Agenda on 2021-06-17 6:00 PM - Special Meeting



## New eComment for City Council Meeting Agenda on 2021-06-17 6:00 PM - Special Meeting

Andrew Hattala submitted a new eComment.

Meeting: City Council Meeting Agenda on 2021-06-17 6:00 PM - Special Meeting

Item: MEETING INFORMATION AND ACCOMMODATION:

eComment: Culver City is poised to make history in its effort to mitigate climate change and establish environmental justice. As a proud and humble new resident of Culver City and as representative of the entire Climate Reality Project Los Angeles Chapter, I strongly endorse passage of agenda item PH-1, the ordinance to phase out oil drilling and remediate all oil wells within Culver City. The issue has been thoroughly studied and a plan as well as timeline has been established to complete it. Only the crucial step of officially ordering its elimination and executing it remains. Culver City has the opportunity to begin the monumental task of deactivating an oil field, ending oil and gas extraction within (it) and completing its restoration. This act can be the inaugural act that sets off the end of oil and gas extraction in Los Angeles, in California and elsewhere. There are health, environmental justice, economic, ecological and societal benefits associated with the phase-out. • Health Benefits: Proximity to oil and gas wells is associated with heightened health risks, illnesses and mental health disorders. This action would severely reduce the prevalence of such dangers, risks and threats. This is especially important and relevant in the midst of the current pandemic. • Establish Environmental Justice: A majority of BIPOC and low income communities reside within close proximity to these oil fields and oil fields in general due to institutionalized environmental racism and racist practices such as redlining. • Economic Benefits: The closure of local oil fields will inevitably generate new opportunities, specifically the remediation of oil wells, land restoration and the establishment new power sources. These opportunities, therefore, represent a source of additional jobs short and long term. • Ecological Benefits: The climate crisis is not abating. Therefore, an expeditious timeline for ending oil and gas extraction, subsequently plugging the wells and monitoring the transition should be implemented to begin reducing emissions that exacerbate climate change, reduce air quality and contaminate the soil and water. • Societal Benefits: This ordinance could be used to make fossil fuel producers responsible for cleaning up the mess and reversing (some) of the damage done to the community. It is an opportunity to transform and remake Culver City into a modern, sustainable metropolis. It is an opportunity to allow disenfranchised members of the community to engage in the planning process. It is an opportunity to install renewable energy

and storage instead of traditional fossil fuels, to establish beautiful green space and to facilitate the transition to a resilient, eco-city. Culver City can begin removing urban oil fields from the landscape and catalyze the transition to renewable energy with this singular vote. The arc can only bend toward justice and the trajectory set towards a cleaner, greener future if we act, if we take such action. Allow community interests and environmental interests (which are one and the same) to govern policy and supplant corporate and industrial interests. I am not alone in endorsing phasing out oil and gas extraction. I am not alone in asking the City Council to vote for phasing it out. Culver City could lead the way, demonstrate its feasibility and create a ripple effect inspiring further cities and regions to do the same. In doing so, millions of citizens will experience the enumerated benefits.

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## Ferrel, Mimi

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**From:** Friend, Megan <mfriender@nrdc.org>  
**Sent:** Thursday, June 17, 2021 10:33 AM  
**To:** Public Comment at Culver City  
**Cc:** Nagami, Damon; Colmenares, Jon  
**Subject:** NRDC Action Fund Activist Comments - Culver City Oil Phase Out  
**Attachments:** NRDC Action Fund Activist Comments - Culver City Oil Phase Out.csv; NRDC Action Fund Cover Letter - Culver City Oil Phase Out.docx

Dear Culver City Council clerk,

Please accept **these 641 public comments (attached) from supporters of the NRDC Action Fund** calling on Culver City officials to take immediate action to phase out oil production across the area.

More than one million people live within five miles of the Inglewood Oil Field. Studies link proximity to oil and gas wells to a host of health problems, including increased risk of preterm births and high-risk pregnancies, asthma, and some types of cancer. And 41 active wells at the Inglewood Oil Field are located within Culver City city limits.

For decades, California's oil industry has been given free rein to drill for health-threatening fossil fuels in the center of our communities, and near our homes, schools, and hospitals.

And residents living near active oil wells are exposed to carcinogenic chemicals, asthma attack-inducing emissions, and the threat of catastrophic oil spills or explosions.

It's time to transition away from fossil fuels in Culver City and across all of LA County and California.

Sincerely,  
Megan Friend

### MEGAN FRIEND

*Senior Digital Advocacy Campaign Manager*

**NATURAL RESOURCES  
DEFENSE COUNCIL**

1314 2nd St, Santa Monica, CA 90401  
T 310.499.8259

[MFRIEND@NRDC.ORG](mailto:MFRIEND@NRDC.ORG)  
[NRDC.ORG](http://NRDC.ORG)

NRDC Action Fund Activist Comments -  
Excel spreadsheet

# NRDC ACTION FUND



Submitted via email to: [public.comment@culvercity.org](mailto:public.comment@culvercity.org)

Dear Culver City Council clerk,

Please accept **these 641 public comments from supporters of the NRDC Action Fund** calling on Culver City officials to take immediate action to phase out oil production across the area.

More than one million people live within five miles of the Inglewood Oil Field.

Studies link proximity to oil and gas wells to a host of health problems, including increased risk of preterm births and high-risk pregnancies, asthma, and some types of cancer.

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It's time to transition away from fossil fuels in Culver City and across all of LA County and California.

Sincerely,

Megan Friend

**MEGAN FRIEND**

*Senior Digital Advocacy Campaign Manager*

**NATURAL RESOURCES**

**DEFENSE COUNCIL**

1314 2nd St, Santa Monica, CA 90401

T 310.499.8259

[MFRIEND@NRDC.ORG](mailto:MFRIEND@NRDC.ORG)

[NRDC.ORG](http://NRDC.ORG)

## Ferrel, Mimi

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**From:** Terry Saucier [REDACTED]  
**Sent:** Thursday, June 17, 2021 11:33 AM  
**To:** Clerk, City  
**Subject:** Written Public Comment - City Council Meeting 2021-06-17 6:00 PM - Special Meeting

To Whom It May Concern:

I would like to submit public comment on Agenda item # PH-1, however looking at your website I am not sure how to do that. The comment I would like to submit follows. Thank you for your help in this matter.

Kind regards,  
*Terry Saucier*

### **Public comment by: Terry Saucier re: Agenda item #PH-1**

Culver City is poised to make history in its effort to mitigate climate change and establish environmental justice. I strongly endorse passage of agenda item PH-1, the ordinance to phase out oil drilling and remediate all oil wells within Culver City. The issue has been thoroughly studied and a plan as well as timeline has been established to complete it. Only the crucial step of officially ordering its elimination and executing it remains.

Culver City has the opportunity to begin the monumental task of de-activating an oil field, ending oil and gas extraction within (it) and completing its restoration. This act can be the inaugural act that sets off the end of oil and gas extraction in Los Angeles, in California and elsewhere. There are health, environmental justice, economic, ecological and societal benefits associated with the phase-out.

- **Health Benefits:** Proximity to oil and gas wells is associated with heightened health risks, illnesses and mental health disorders. This action would severely reduce the prevalence of such dangers, risks and threats. This is especially important and relevant in the midst of the current pandemic.
- **Establish Environmental Justice:** A majority of BIPOC and low income communities reside within close proximity to these oil fields and oil fields in general due to institutionalized environmental racism and racist practices such as redlining.
- **Economic Benefits:** The closure of local oil fields will inevitably generate new opportunities, specifically the remediation of oil wells, land restoration and the establishment new power sources. These opportunities, therefore, represent a source of additional jobs short and long term.
- **Ecological Benefits:** The climate crisis is not abating. Therefore, an expeditious timeline for ending oil and gas extraction, subsequently plugging the wells and monitoring the transition should be implemented to begin reducing emissions that exacerbate climate change, reduce air quality and contaminate the soil and water.

- **Societal Benefits:** This ordinance could be used to make fossil fuel producers responsible for cleaning up the mess and reversing (some) of the damage done to the community. It is an opportunity to transform and remake Culver City into a modern, sustainable metropolis. It is an opportunity to allow disenfranchised members of the community to engage in the planning process. It is an opportunity to install renewable energy and storage instead of traditional fossil fuels, to establish beautiful green space and to facilitate the transition to a resilient, eco-city.

Culver City can begin removing urban oil fields from the landscape and catalyze the transition to renewable energy with this singular vote. The arc can only bend toward justice and the trajectory set towards a cleaner, greener future if we act, if we take such action. Allow community interests and environmental interests (which are one and the same) to govern policy and supplant corporate and industrial interests.

I am not alone in endorsing phasing out oil and gas extraction. I am not alone in asking the City Council to vote for phasing it out. Culver City could lead the way, demonstrate its feasibility and create a ripple effect inspiring further cities and regions to do the same. In doing so, millions of citizens will experience the enumerated benefits.

Thank you for your activism.

*Terry Saucier*



*Albert Einstein* "Look deep into nature, and then you will understand everything better. Try not to become a man of success, but rather try to become a man of value..."

<https://climate.nasa.gov/>

<https://www.climaterealityproject.org/>

## Ferrel, Mimi

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**From:** Berlin, Greg <Greg.Berlin@alston.com>  
**Sent:** Thursday, June 17, 2021 11:37 AM  
**To:** Clerk, City; Public Comment at Culver City  
**Cc:** Carlsen, Nicki; Wickersham, Matt; Camacho, Dana  
**Subject:** Sentinel Peak Resources Comments on Proposed Ordinance (1 of 2)  
**Attachments:** 2021-06-17 Letter to Culver City re Proposed Zoning Code Amendment P2021-0036-ZCA.pdf; 2021-06-17 - Report of Robert Lang.pdf; 2021-06-16 - Catalyst TM for Culver City Ordinance.pdf; 2016 & 2018 SIMQAP Audits.pdf; September 2019 Periodic Review.pdf

Good afternoon,

On behalf of Sentinel Peak Resources, please see the attached comment letter and attachments submitted in advance of the June 17, 2021 City Council Meeting regarding the proposed ordinance terminating nonconforming oil uses. Due the large file size of the attachments, we are transmitting these documents in two separate emails. This constitutes email one of two.

Please let me know if you have any issues opening or accessing these documents. Thanks very much.

**Greg Berlin | Senior Associate | ALSTON & BIRD**  
333 South Hope Street, 16th Floor | Los Angeles, CA 90071  
[Greg.Berlin@alston.com](mailto:Greg.Berlin@alston.com) | t: 213.576.1045 | c: 650.334.5939

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# ALSTON & BIRD

333 South Hope Street, 16th Floor  
Los Angeles, CA 90071-1410  
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Nicki Carlsen

Direct Dial: 213-576-1128

Email: [nicki.carlsen@alston.com](mailto:nicki.carlsen@alston.com)

June 17, 2021

VIA EMAIL

City of Culver City  
City Council for the City of Culver City  
9770 Culver Boulevard  
Culver City, CA 90232  
[public.comment@culvercity.org](mailto:public.comment@culvercity.org)

Re: Proposed Zoning Code Amendment P2021-0036-ZCA – City Council June 17,  
2021 Public Hearing

Dear Mayor, Vice Mayor and Honorable Council Members:

We represent Sentinel Peak Resources California, LLC (“Sentinel”) and are writing in opposition to the City of Culver City’s (“City”) proposed Zoning Code Amendment, Ordinance P2021-0036-ZCA entitled, “Nonconforming Oil Use, to Terminate Nonconforming Oil and Gas Uses by July 28, 2026” (the “proposed Ordinance”). The City’s proposed action is illegal and improper, and the City Council must reject the proposed Ordinance.

As background, Sentinel is the operator of the oil and gas facilities of the entire Inglewood Oil Field (“IOF”), which is located predominantly within the unincorporated area of Los Angeles County (“County”) along with a small section in the jurisdiction of the City. The IOF, which is the most stringently regulated oil field in California, is operated as an integrated whole pursuant to the Baldwin Hills Community Standards District (“CSD”) and the 2011 Settlement Agreement and Mutual Release regarding the CSD between the City, Community Health Councils, Inc., Natural Resources Defense Council, Mark Salkin, Citizens Coalition for a Safe Community, and Concerned Citizens of South Central Los Angeles, and the County along with the operator at the time, Plains Exploration & Production Company (“Settlement Agreement”). The requirements for the County CSD by nature embrace the oil field in its entirety and therefore are implemented at the City portion of the IOF and have been so implemented since 2008.

## **1. State Law and the City’s Code Require that the Planning Commission Hold a Public Hearing on a Proposed Zoning Ordinance**

The City’s proposed “Zoning Code Amendment” is being introduced by the City Council without following one of the most fundamental requirements of State planning law, which is to have the Planning Commission hold a public hearing on the proposed zoning ordinance and to make a

written recommendation to the legislative body. Gov. Code §§ 65854-65857. The City's Code reflects these requirements. Municipal Code, Chapter 17.620. Any action taken without following these requirements is void by operation of law. *See, e.g., Sounhein v. City of San Dimas*, 11 Cal.App.4th 1255, 1260-61 (1992) (failure of city planning commission to hold a public hearing on adoption of a zoning ordinance, as required under Gov. Code § 65854, rendered the ordinance void). The City's Planning Commission has not conducted a public hearing on the proposed Ordinance, nor has it made a written recommendation to the City Council. The City Council should reject any further proceedings on the proposed Ordinance and comply with the law.

## **2. The Proposed Ordinance Cannot be Adopted Without a Valid General Plan**

One of the required elements of a General Plan is a land use element that "designates . . . the uses of land . . ." Gov. Code § 65302. The Culver City General Plan, adopted in the 1990's, fails to identify the applicable land uses for the approximately 77-acre area portion of the City IOF, and instead has designated this area as a "Focused Special Study Area" which is not a land use designation at all. As stated in the General Plan, this area "will be the subject of a feasibility study and a subsequent Focused Special Study to address the potential for appropriate open space, residential, commercial and industrial uses and access." This study has not been prepared, although the General Plan was adopted in 1996, 25 years ago. The City is required to designate land uses for this area, and its failure to do so results in an invalid General Plan. *Camp v. Bd. of Supervisors*, 123 Cal.App.3d 334, 348 (1981).

The General Plan also states that "interim" land use designations are industrial and open space. The General Plan does not define what an "interim" land use is, and in any case, State planning laws do not provide for interim land uses. State planning laws require that the uses of land be designated, and for good reason -- property owners have a right to know what the land use designation is for their property. The General Plan is the constitution for all future development. *See Leshar Communications, Inc. v. City of Walnut Creek*, 52 Cal.3d 531, 540 (1990); *see also Citizens of Goleta Valley v. Bd. of Supervisors*, 52 Cal.3d 553, 572 ("Local agencies must periodically review and revise their general plans as circumstances warrant . . .").

An adequate General Plan is a prerequisite to taking action on any land use approval related to that inadequacy. *Kings County Farm Bureau v. City of Hanford*, 221 Cal.App.3d 692, 744-745 (1990). Here, the General Plan inadequacy is directly related to the City portion of the IOF, where the proposed Ordinance would apply.

The City claims in the proposed Ordinance that oil and gas uses have been prohibited by the Municipal Code, and that they were allowed to continue as a non-conforming use. However, the Municipal Code is not the constitution for all development, and the General Plan does not prohibit oil and gas uses, nor does it make them non-conforming uses. Instead, the General Plan states that the future Focused Special Study is to evaluate different land uses and "address the potential for appropriate open space use, residential, industrial and commercial uses, and access." *See* General Plan at p. OS-19.) The City cannot modify land uses in the City IOF through

this proposed Ordinance without having first completed the Focused Special Study or otherwise establish a valid General Plan.

Again, the existing land use designation of “Focused Special Study Area” is invalid, and it needs to be amended. The City cannot keep the property owners guessing, and it cannot keep the land use designations in a perpetual state of suspension. Further, any proposed land use ordinance must be consistent with and implement a valid General Plan. “The tail does not wag the dog.” *Leshner*, 52 Cal.3d at 540. A valid General Plan must be in place prior to the City taking any action on this proposed Ordinance.

### **3. The Proposed Ordinance is Not Consistent with the General Plan**

State law also requires that zoning ordinances be consistent with the general plan. Gov. Code § 65860. A zoning ordinance is only considered consistent if the city or county has officially adopted a general plan, and if the “various land uses authorized by the ordinance are compatible with the objectives, policies, general land uses, and programs specified in the plan.” *Id.* at §§ 65860(a)(1), (a)(2).

As stated above, the current General Plan is invalid, and it would be impossible for the proposed Ordinance to be compatible with an invalid General Plan. *See, e.g., Guardians of Turlock’s Integrity v. Turlock City Council*, 149 Cal.App.3d 584, 598 (“[A] proposed project cannot be consistent with an invalid general plan”). In addition, the City’s General Plan does not prohibit oil and gas uses (nor does it provide for non-conforming oil and gas uses) but rather, establishes illegal “interim” uses and requires the preparation of a Focused Special Study, which has not been prepared in the 25 years since the General Plan was adopted.

The City does not even attempt to explain how this proposed Ordinance implements the General Plan provisions for the Baldwin Hills area. Policy 27.F of the Land Use Element of the General Plan (General Plan, p. LU-59) for the Blair Hills/Baldwin Hills Area and its associated Measure 3.A for to the Blair Hills/Baldwin Hills Feasibility Study and Focused Special Study are not even mentioned in the proposed Ordinance. The City instead identifies two other policies, Land Use Element Policy 1.B and LUE Policy 27.B, and simply ignores the most relevant and critical section of the General Plan, Policy 27.F and Measure 3.

Policy 27.F directs the City to prepare the Focused Special Study to evaluate these technical issues in the context of various potential uses – open space, residential, commercial, industrial and access – and no standards have been established by this policy. This is confirmed in Measure 3.A which states:

**MEASURE 3. CREATE FOCUSED SPECIAL STUDIES.** Some areas of the City have special needs or conditions that would benefit from detailed investigations which may address issues such as allowable land use patterns, design standards, zoning codes and other property development standards. They may include detailed regulations, conditions, programs and proposed designations supplemental to the General Plan, including infrastructure requirements, resource conservation, and implementation measures, and identify potential changes in land use that may be appropriate to meet future needs.

The General Plan designates the allowable mix of uses within each Focused Special Study area and identifies land use and development goals. To accommodate possible development within these areas before the Focused Special Studies are completed, an underlying designation or designations will identify the anticipated land uses for the first three.

A. Blair Hills/Baldwin Hills Area Feasibility Study and Focused Special Study. The undeveloped area within Blair Hills (excluding the Vista Pacifica residential development site), the industrial properties between Culver city Park and the multiple family residential area, and the unincorporated Los Angeles county lands west of La Cienega Boulevard will be the subject of a feasibility study and a subsequent Focused Special Study to address the potential for appropriate open space, residential, commercial and industrial uses and access. (See Figure LU-22, Blair Hills/Baldwin Hill Area Focused Special Study.) Most of this area historically has been designated as open space, although the undeveloped area of Blair Hills has been zoned for single family development. Issues to be investigated to determine the development capability and benefits to the City include:

- *Slope and soil stability*
- *Soil Contamination*
- *Seismic and subsidence risks*
- *Visual character and viewsheds*
- *Vehicle and pedestrian access*
- *Biological resources*
- *Recreation opportunities*
- *Protection of existing adjacent residential neighborhoods*
- *Housing opportunities to address regional needs*
- *Limited vehicle access from La Cienega Boulevard*

Investigations of the Los Angeles County lands will determine the benefits and costs of annexation into Culver City. Land use limitations for the industrial properties south of Jefferson Boulevard will be based on the likely development with the County area to the east. Interim land use designations for these areas are industrial and open space, as represented by the Land Use Element Map (Figure LU-7).

The City is required to demonstrate how the proposed Ordinance is compatible and consistent with the General Plan. The proposed Ordinance claims to be “consistent with General Plan Goals and Policies that call for a transition away from oil and gas uses” but no such goals and policies exist. And, it is not sufficient merely to state in a conclusory fashion that the proposed Ordinance is consistent with the General Plan. Policy 27.F and Measure 3.A require the

preparation of a Focused Special Study and this proposed Ordinance is not compatible or consistent with either the policy or the measure, and instead, it conflicts with these General Plan directives.

The City purports to demonstrate consistency with the General Plan by referring to Policy 1.B of the Land Use Element, but this is a tortured analysis. As a preliminary matter, the City fails to identify Objective 1 of the Land Use Element to which Policy 1.B applies, which states: “OBJECTIVE 1. Neighborhood Character. Protect the low- to medium density character of residential neighborhoods through the City.” The oil and gas operations have no effect on the low- or medium- density of those neighborhoods. In addition, Policy 1.B, to protect these neighborhoods from “encroachment of incompatible land uses and environmental hazards” makes no sense with respect to the proposed Ordinance because the oil and gas uses pre-date these neighborhoods. Furthermore, Policy 1.B does not even mention oil and gas operations as an incompatible land use, though the existence of these uses were well known to the City as demonstrated by the other provisions of the General Plan. The City also attempts to rely on Land Use Element Policy 27.B “to protect the visible and useable open space resources within Blair Hills . . . .” to support the proposed Ordinance. The City IOF property is not the “visible and useable open space within Blair Hills” referenced in this policy and it simply does not apply to the proposed Ordinance.

#### **4. The Proposed Ordinance is Not Exempt from CEQA**

In what can only be described as one of the most hypocritical positions taken by the City, and there are several to choose from, the City has determined that the proposed Ordinance is conveniently exempt from CEQA. Over the history of the IOF, expanding nearly a century, the City has consistently demanded greater CEQA review for every aspect of IOF oil and gas operations, even suing the County and the former operator over the County EIR, but now the City claims that the proposed Ordinance is exempt from CEQA. The City’s interpretation of CEQA is simply not supported by the law, and substantive CEQA review for the proposed Ordinance is required.

First, while permits for plugging and abandoning wells are often ministerial and exempt from CEQA, the City’s proposed Ordinance would require a comprehensive scope of work far greater than the abandonment of wells. Specifically, the proposed Ordinance requires “the dismantling and removal of all physical operational components” and “the remediation and restoration of the Premises to substantially its original condition, free from all oil, rotary mud, oil-soaked earth, asphalt, concrete, litter, debris and other substances associated with the drilling or pumping activity, and revegetation of Premises consistent with their natural or original condition.” Setting aside the validity of mandating these activities, which is a troubling but separate issue, the City is required under CEQA to consider the environmental effects of these activities.

More specifically, what is the quantity of “operation components” to be dismantled and removed? What type of equipment will be used to dismantle these components and how long would it take? Would heavy, noise-generating equipment be used? How many truck trips would be required to remove the components and where would they be taken, to recycling, to

another waste facility? How far away is the waste facility? How much soil is to be removed to restore the site to its original condition? Again, how many truck trips would be required and where would the soil be taken, to waste facilities, and if so, where are they located? What types of activities are required for restoration? What are the noise, air quality, and greenhouse gas effects of these activities? By invoking various exemptions, the City seeks to sweep these very real environmental impacts under the proverbial rug. CEQA requires more, and the City's reliance on CEQA exemptions for the proposed Ordinance is improper.

In addition, the City's staff report and proposed Ordinance make various claims regarding CEQA's standard environmental topics, including benefits to the environment, reducing greenhouse gas emissions and air pollution, and improving seismic safety, but provides literally no evidence, much less "substantial evidence," to support those conclusions. At the same time, the staff report overlooks that phasing-out oil and gas production in the City will result in the loss of availability of a known mineral resource – petroleum – which is an environmental topic to be considered under CEQA. See CEQA Appendix G. CEQA is the process by which these type of environmental effects are vetted and considered by the decision-making body, the public, and those whose interests are detrimentally affected by a proposed discretionary action.

Second, the City proposes to eliminate the existing uses at the IOF site with this proposed Ordinance, and under CEQA, the City is required to evaluate the future uses that would be facilitated or authorized by the termination of oil and gas uses under the proposed Ordinance. CEQA defines "project" to mean "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment." CEQA Guidelines, Section 15378. Starting with the California Supreme Court's decision in *Bozung v. Local Agency Formation Com.*, 13 Cal.3d 263 (1975), California courts have prohibited "piecemealing" and the City's refusal to consider the future uses at the IOF site is classic piecemealing. (See *Laurel Heights Improvement Ass'n v. Regents of the University of Cal.*, 47 Cal.3d 376 (1988) and subsequent decisions.) Of course, the City's deficient General Plan and its illegal "interim" uses further complicate the issue, but the City's failure to have a valid General Plan does not provide an excuse for failing to comply with CEQA. The City must consider the future uses in a substantive CEQA document.

The City claims in the staff report that the elimination of oil and gas uses "will improve land consistency and compatibility between . . . the City IOF area and other surrounding residential and community uses." The City also states that the proposed Ordinance would "support City objectives to utilize cleaner, renewable energy sources . . ." The City further claims in its proposed findings that the elimination of oil and gas would "reduce global climate change," "reduce the air pollutant burden," and "result in reduced risk of upset and enhance seismic safety" but again, as stated above, the City has produced no evidence to support those claims. Furthermore, without an understanding of the future uses, none of these claims can be properly evaluated or substantiated. If the City intends to authorize "renewable energy sources" or other uses on the 77-acre IOF site (and by law, it needs to authorize some land use), as stated in the Staff Report, those uses need to be evaluated in a CEQA document. See Staff Report at p. 8.

The City has also engaged in piecemealing by segmenting the proposed Ordinance from the General Plan Update. The Staff Report expressly recognizes that the proposed Ordinance will “affirm” the General Plan Update, “which is currently underway, and seeks to accommodate a shift in policy through reevaluation of long-range objectives for the oil field area.” Staff Report at 4. Because the proposed Ordinance expressly anticipates and will affirm the General Plan Update, the City must analyze the environmental effects of the proposed Ordinance in the Draft EIR for the General Plan Update. By segmenting the proposed Ordinance from the General Plan Update, the City is unlawfully seeking to avoid full disclosure of the cumulative environmental impacts that will result from implementation of the proposed Ordinance and General Plan Update. *See, e.g., Orinda Assn. v. Bd. of Supervisors*, 182 Cal.App.3d 1145, 1171 (1986) (“A public agency is not permitted to subdivide a single project into smaller individual subprojects in order to avoid the responsibility of considering the environmental impact of the project as a whole.”).

Third, the elimination of California oil and gas production has reasonably foreseeable environmental consequences because it would result in a comparable increase in oil and gas production elsewhere. Catalyst Report at pp. 1, 4. Nothing in the City’s proposed Ordinance indicates that demand for oil and gas in California (particularly southern California) has decreased or will decrease as a result of the proposed Ordinance and the elimination of this production will require increased production elsewhere to meet that demand. To the contrary, as explained in the Catalyst report:

Overall crude demand has held steady in California for the past 20 years, but the percent of domestic (California) production has declined. Crude oil imports from Saudi Arabia, Ecuador, Columbia, Iraq, Kuwait, and Alaska have offset the decline of California production over the last two decades. Because California does not have any interstate pipelines that supply crude oil to the State from other states, it is isolated from the larger national petroleum network and therefore must rely on foreign and Alaskan sources of oil that are transported by marine tankers. Any reduction in supply from the Inglewood Oil Field cannot be offset by increasing imports from another state. The marine transport emits greenhouse gases and leads to a net increase in lifecycle greenhouse gas emissions if the City adopts this measure.

Catalyst Report at p. 4.

**5. City and County IOF Operated in Compliance with Applicable Regulations (including Settlement Agreement)**

The staff report for the proposed Ordinance asserts (with no evidence) that “the ongoing nonconforming oil and gas activity is affecting the public health, safety, welfare and quality of life for existing residents and businesses as demonstrated by technical studies and other expanding evidence . . . .” The “technical studies” and “other evidence” are not provided and to the contrary, the City and County IOF has been operating in compliance with applicable

regulations, the CSD, and the Settlement Agreement that the City executed with the prior operator and the County.

As detailed in the Catalyst Report, the CSD addresses *all* of the alleged concerns cited in the City’s Staff Report, and much more. Catalyst Report at pp. 2-3. This includes, but is not limited to, groundwater monitoring with reports provided to the County and regional water board, seismic monitoring, environmental compliance monitoring and reporting of air quality and air emissions, an Air Monitoring Plan that requires installations of automatic alarms to detect odorous gases that exceed CSD thresholds, implementation of Department of Conservation Geological Energy Management Division (“CalGEM”) regulatory requirements for all subsurface aspects of oil and gas development and water injection, and a Landscaping Plan designed to create a visual screening along the outer boundary of the CSD and along public streets that run through the oil field. *Id.*

Field operators under the CSD have consistently complied with all the provisions in both the County and City jurisdictions.

Submitted with this letter are several reports that document Sentinel’s compliance with applicable regulations:

- Baldwin Hills Community Standards District, Periodic Review II (Initial Draft September 2019).
- Baldwin Hills Community Standards District, Periodic Review (Final Report September 2015).
- FM O&G Inglewood Oil Field, Safety Inspection, Maintenance and Quality Assurance Program, Safety Audits (July 2016 and August 2018).
- Environmental Quality Assurance Program (EQAP) Reports, 2011-2020.

The September 2015 Periodic Review states: “As detailed in the following pages of this report, the results of this Periodic Review document that the provisions of the CSD have been effective and adequate to protect the health, safety, and general welfare of the public.” (2015 Periodic Review, p. ES-1.) Similarly, the draft Periodic Review II from September 2019 states: “As detailed in the following pages of this report, the results on this Periodic Review demonstrates that the provisions of the CSD have been effective and adequate to protect the health, safety, and general welfare of the public.” (2019 Periodic Review, p. ES-1.)

The City also refers to managing its resources more efficiently “by minimizing unproductive use of City staff and financial resources spent toward enforcement of regulations applicable to the City IOF . . . .” However, the City has not spent one dime on any enforcement action against Sentinel, as no such action has ever been taken. The City has certainly spent egregious amounts of money chasing improper and ultimately abandoned regulatory schemes (i.e., proposed Specific Plan and EIR), but not in enforcement actions. The City IOF has consistently operated in compliance with all applicable regulations.



**6. The Required Findings for the Proposed Ordinance Cannot be Made and are Not Supported by the Evidence**

The City is required to make three specific findings in order to adopt the proposed Ordinance under Culver City Municipal Code Section 17.620.030A. As discussed below, these required findings cannot be made and are not supported by any evidence.

First, the City must find that the proposed Ordinance ensures and maintains internal consistency with the goals, policies, and strategies of all elements of the General Plan and will not create any inconsistencies. As discussed in Section 3, the proposed Ordinance is inconsistent with the General Plan, including because the current General Plan is invalid, and it would be impossible for the proposed Ordinance to be compatible with an invalid document.

Second, the City must find that the proposed Ordinance would not be detrimental to the public interest, health, safety, convenience or welfare of the City. As discussed in Section 4, the Catalyst report demonstrates that the phasing-out of oil and gas production in California will lead to an increase in the imports by tanker ship to replace the lost domestic oil production, which will further lead to a net increase in GHG emissions. This would be detrimental to the public health, safety, convenience, and welfare.

Moreover, as discussed in Section 5, Sentinel complies with all applicable regulations, the CSD, and the Settlement Agreement, which all function to protect public health, safety, and the environment. The September 2015 and 2019 Periodic Reviews concluded that compliance with the CSD has been “adequate to protect the health, safety, and general welfare of the public.” In addition, the Los Angeles County Department of Public Health conducted an epidemiological study that compared incidence of health-related outcomes of the population near the IOF compared to the County as a whole and found no oil production-related concerns. Catalyst Report at p. 2. Thus, the alleged “concerns” the City cites to support this finding are not supported by the evidence.

Third, the City is required to find that the proposed Ordinance is in compliance with the provisions of CEQA. As discussed in Section 4, the City has not complied with CEQA because it unlawfully exempted the proposed Ordinance from CEQA review. In so doing, the City undermined the very purpose of CEQA, which is to “compel government at all levels to make decisions with environmental consequences in mind.” See *Laurel Heights*, 47 Cal.3d at 393. Rather than keep “environmental consequences in mind,” the City has ignored them.

**7. The Proposed Ordinance Illegally Seeks to Eliminate the Dominant Estate of Oil and Gas Rights Across Entire City**

The proposed Ordinance seeks to eliminate all oil and gas production in the entire City. However, oil and gas rights function as a dominant estate, and this dominant estate allows the mineral rights holder to use the surface as reasonably required to access the minerals. *Vaquero Energy, Inc. v. County of Kern*, 42 Cal. App. 5th 312, 319-320 (2019); *Bourdieu v. Seaboard Oil Corp.*, 38 Cal. App. 2d 11, 16-17 (1940); *Wall v. Shell Oil Co.*, 209 Cal.App.2d 504, 511–514 (1962). The City fails to acknowledge and ignores this dominant estate in presenting the

proposed Ordinance, and provides no basis, much less a legitimate basis, for this action. The proposed Ordinance would prevent any mineral rights holder from exercising the dominant estate protected by law. Separate and apart from the fact that the proposed Ordinance would constitute a taking of this dominant estate and associated oil and gas rights (see discussion below), the City cannot as a matter of law eliminate the dominant estate from each and every parcel in the entire City.

#### **8. The City's Proposed Ordinance Would Constitute Breach of Settlement Agreement**

The City entered into a Settlement Agreement with the prior operator of the IOF and the County regarding the adoption of the CSD and certification of the EIR for the CSD. The EIR evaluated both the City and County portions of the IOF as the IOF is operated as an integrated whole. As a part of that Settlement Agreement, the City agreed to dismiss its lawsuit challenging the EIR, and agreed to numerous other environmental measures, including those relating to potential environmental effects of the operation of the IOF. Although the CSD was adopted by the County, the City IOF has been operated in a manner consistent with the County IOF under the CSD, which has been an acknowledged practice since it was adopted. The City received \$1,600,000 pursuant to the Settlement Agreement, the bulk of which was paid by the prior operator of the IOF.

The fundamental understanding of the Settlement Agreement was that IOF operations, both City and County operations, would continue. The City effectively acknowledged this intent through acceptance of the \$1,600,000 settlement payment. Any action to eliminate IOF operations would be a blatant breach of the good faith and fair dealing provision of the Settlement Agreement. See Settlement Agreement, Section 34.

#### **9. The Proposed Ordinance is Preempted by State and Federal Law**

The California Constitution states: "A county or city may make and enforce within its limits all local, police, sanitary, and other ordinances and regulations not in conflict with general laws." Cal. Const., Art. XI, Sec. 7. Local laws conflict with general law if the local laws duplicate, contradict or enter an area fully occupied by general law. *Morehart v. County of Santa Barbara*, 7 Cal.4th 725 (1994). The court in *Morehart* states:

The general principles governing state statutory preemption of local land use regulation are well settled. "The Legislature has specified certain minimum standards for local zoning regulations (Gov. Code, § 65850 et seq.)" even though it also "has carefully expressed its intent to retain the maximum degree of local control (see, e.g., *id.*, § 65800, 65802)." (*IT Corp. v. Solano County Bd. of Supervisors* (1991) 1 Cal.4th 81, 89 [2 Cal.Rptr.2d 513, 820 P.2d 1023].) "A county or city may make and enforce within its limits all local, police, sanitary, and other ordinances and regulations *not in conflict with general laws.*" (Cal. Const., art. XI, § 7, italics added.) "Local legislation in conflict with general law is void. Conflicts exist if the ordinance duplicates [citations], contradicts [citation], or enters an area fully occupied by general law, either expressly or by legislative

implication [citations].” (*People ex rel. Deukmejian v. County of Mendocino* (1986) 36 Cal.3d 476, 484 [204 Cal.Rptr. 897, 683 P.2d 1150], quoting *Lancaster v. Municipal Court* (1972) 6 Cal.3d 805, 807-808 [100 Cal.Rptr. 609, 494 P.2d 681]; accord, *Sherwin-Williams Co. v. City of Los Angeles* (1993) 4 Cal.4th 893, 897 [16 Cal.Rptr.2d 215, 844 P.2d 534].)

*Morehart*, 7 Cal.4th at 747; see also California Attorney General’s opinion recognizing preemptive effect of State oil and gas laws, 59 Ops. Cal. Atty. Gen. 461,462 (1976).

Local regulations may also be preempted based on federal law under the Supremacy Clause of the U.S. Constitution. U.S. Const., Art. VI, cl. 2; see also *Ting v. AT&T*, 319 F.3d 1126, 1135 (9th Cir. 2003).

Here, the proposed Ordinance conflicts with California law regarding the production of oil and gas, including drilling, operations, abandonment and maintenance. The authority to regulate all aspects of oil and gas production, including downhole activities, rests with CalGEM. Cal. Pub. Res. Code §3106(b). The State’s oil and gas laws read: “To best meet oil and gas needs in this state, the supervisor shall administer this division so as to encourage the wise development of oil and gas resources.” Cal. Pub. Res. Code § 3106(d). CalGEM’s authority with respect to the production of oil and gas in the State is comprehensive:

The supervisor shall also supervise the drilling, operation, maintenance, and abandonment of wells so as to permit the owners or operators of the wells to utilize all methods and practices known to the oil industry for the purpose of increasing the ultimate recovery of underground hydrocarbons and which, in the opinion of the supervisor, are suitable for this purpose in each proposed case. To further the elimination of waste by increasing the recovery of underground hydrocarbons, it is hereby declared as a policy of this state that the grant in an oil and gas lease or contract to a lessee or operator of the right or power, in substance, to explore for and remove all hydrocarbons from any lands in the state, in the absence of an express provision to the contrary contained in the lease or contract, is deemed to allow the lessee or contractor, or the lessee’s or contractor’s successors or assigns, to do what a prudent operator using reasonable diligence would do, having in mind the best interests of the lessor, lessee, and the state in producing and removing hydrocarbons, including, but not limited to, the injection of air, gas, water, or other fluids into the productive strata, the application of pressure heat or other means for the reduction of viscosity of the hydrocarbons, the supplying of additional motive force, or the creating of enlarged or new channels for the underground movement of hydrocarbons into production wells, when these methods or processes employed have been approved by the supervisor, except that nothing contained in this section imposes a legal duty upon the lessee or contractor, or the lessee’s or contractor’s successors or assigns, to conduct these operations.

Cal. Pub. Res. Code § 3106(b).

The State laws and associated regulations reflect an intent to occupy the entire area: Cal. Pub. Res. Code §§ 3000-3112 (General Provisions and Administration); Cal. Pub. Res. Code §§ 3130-3132 (Underground Injection Control), Pub. Res. Code §§ 3150-3161 (Well Stimulation); Cal. Publ. Res. Code §§ 3180-3187 (Natural Gas Storage Wells), Cal. Pub. Res. Code §§ 3200-3238 (Regulation of Operations); Cal. Pub. Res. Code §§ 3240-3241 (Abandoned Wells); Cal. Pub. Res. Code §§ 3250-3258 (Hazardous Wells); Cal. Pub. Res. Code §§ 3260-3263 (Acute Orphan Wells); Cal. Pub. Res. Code §§ 3270-3270.6 (Regulation of Production Facilities); Cal. Pub. Res. Code §§ 3275-3277 (Interstate Cooperation in Oil and Gas Conservation); Cal. Pub. Res. Code §§ 3300-3314 (Unreasonable Waste of Gas); Cal. Pub. Res. Code §§ 3315-3347 (Subsidence); Cal. Publ. Res. Code §§ 3350-3359 (Appeals and Review); Cal. Pub. Res. Code §§ 3400-3433 (Assessment and Collection of Charges); Cal. Pub. Res. Code §§ 3450-3451 (Recommendation of Maximum Efficient Rates of Production); Cal. Pub. Res. Code §§ 3780-3787 (Oil Sumps). The regulations include more detailed requirements for onshore wells (14 Cal. Code Reg. §§ 1712-1724.10), environmental protections for production facilities, tanks, pipelines (14 Cal. Code Reg. §§ 1750-1779.1), and expressly address well stimulation and seismic activity (14 Cal. Code Reg. §§ 1780-1789).

The City's proposed Ordinance improperly seeks to prohibit, as of July 28, 2021, most oil and gas activity, including the drilling, redrilling or deepening of existing wells and to prohibit the erection of any derrick, structure or equipment related to oil and gas operations, except as required to facilitate the termination of oil and gas operations, all of which conflict with the State's laws and regulations. The City's proposed Ordinance also seeks to eliminate all oil and gas operations in the City IOF by July 28, 2026, and this too, is in direct conflict with the State's mandate to produce oil and gas resources in the State. For these reasons alone, the proposed Ordinance is preempted by State law.

With the proposed Ordinance and its prohibitions, the City also seeks to insert itself in regulating injection wells, and that is also in conflict with the State and federal programs for the regulation of injection wells. There are comprehensive State and federal programs for the regulation of groundwater and surface water, including the Clean Water Act, Porter-Cologne Act, the Safe Drinking Water Act, the Los Angeles Region Basin Plan, National Pollutant Discharge Elimination Program (NPDES), and CalGEM regulations for onshore wells and the Underground Injection Control (UIC) Program. However, the City improperly seeks to prohibit any activity with respect to injection wells, and given the federal and corresponding State programs to regulate and fully occupy the field, the proposed Ordinance would be preempted under federal and State preemption doctrines.

The City cannot frame these prohibitions and limitations as being limited to regulating "land use" – courts have seen through these pretexts in the past. When the County of Monterey attempted to enact a voter-approved initiative banning or severely curtailing well stimulation treatments and underground wastewater injection and storage, the court found that despite being touted as a regulation of surface land use, the measure improperly attempted to regulate activities that were entirely preempted by state law, and that the efforts to characterize the measure otherwise amounted to the County attempting to do an end run around the preemptive state laws. The court stated that the measure's "purported prohibition on certain

'land uses' is clearly a pretextual attempt to do indirectly what it cannot do directly. See 59 Ops.Cal.Atty.Gen at p. 478 which states 'there will . . . be a conflict with state regulation when a local entity, attempting to regulate for a local purpose, *directly or indirectly* attempts to exercise control over subsurface activities.'].)" *Chevron U.S.A., Inc., v. County of Monterey*, Monterey County Superior Court case no. 16CV003978, Final Statement of Decision, p. 26 (Jan. 28, 2018, appeal pending) ("*Measure Z*").

The court went on to find that a ban on new wells was also preempted by the Safe Drinking Water Act ("SDWA") and the state's primacy in implementing the act. The court noted that the ban on new wells included a ban on new injection wells, which impedes California's UIC program developed under the SDWA. *Measure Z, supra* at 34-35. Where "the state has undertaken to allow UIC wells, [that] action operates to diminish [a local agency's] power to prohibit them." *Id.*, citing *EQT Prod. Co. v. Wender*, 191 F. Supp. 3d 583, 601 (2016).

The principles articulated in the *Measure Z* decision are ones that the City should heed, because they apply equally here.

#### **10. The City's Proposed Ordinance Would Constitute a Taking of Vested Rights in Violation of the U.S. and California Constitutions**

The U.S. and California Constitutions provide that private property shall not be taken without just compensation. U.S. Const. amend. V; Cal. Const., Art. 1, § 19. These constitutional protections apply to regulatory takings. *Lucas v. S.C. Coastal Council*, 505 U.S. 1003, 1014 (1992). "The right to remove oil and gas from the ground is a property right." *Maples v. Kern Cty. Assessment Appeals Bd.*, 103 Cal.App.4th 172, 186 (2002). The City's proposed Ordinance serves to affect an unconstitutional taking of Sentinel's property as an operator of the City IOF, along with the property of the landowners and the mineral rights holders.

Sentinel has vested property rights to operate in the IOF, including the City portion of the IOF, and these vested property rights are recognized by the City, which characterizes the oil and gas activities as legally non-conforming uses. *Hansen Bros. Enters. v. Bd. of Supervisors*, 12 Cal.4th 533, 552 (1996) ("[A] provision which exempts existing nonconforming uses 'is ordinarily included in zoning ordinances because of the hardship and doubtful constitutionality of compelling the immediate discontinuance of nonconforming uses.'") The right to continue the operation of an established business and legal nonconforming use in which the owner has made a substantial investment is "sufficiently personal, vested and important to preclude extinction by a nonjudicial body" and qualifies for treatment as a "fundamental vested right." *Davidson v. County of San Diego*, 49 Cal.App.4th 639, 646 (1996).

As described in this letter, the City has not set forth a legitimate basis for its proposed action. The City proposes to prohibit any new wells, redrilled wells or deepening of wells, and to prohibit further virtually all oil and gas related activity, starting next month, July 2021, and to eliminate all oil and gas operations by 2026, but these prohibitions are not based on scientific evidence regarding the oil and gas resources in the IOF, nor is it based on input from the

operator or the landowners. Given the State’s directive to produce the oil and gas resources of the State, the City’s actions are not rationally related to any legitimate purpose.

Furthermore, by seeking to eliminate virtually all oil and gas activities in the City IOF by July 2021 and ending them altogether by 2026, the City would be denying Sentinel all economically viable use of its property. *Lucas*, 505 U.S. at 1015. As the operator, Sentinel’s sole interest in the City IOF relates to the development and production of oil and gas resources and the elimination of that use eliminates Sentinel’s vested property rights. Accordingly, the proposed Ordinance would result in a taking of Sentinel’s vested rights to operate.

The City does not directly articulate the scope of Sentinel’s vested rights, but these rights are far broader in scope than those recognized in the City’s proposed Ordinance. Sentinel’s vested rights to develop and produce oil and gas resources are not limited to the production value of the existing wells, and instead, includes all prudent and feasible means to develop and produce oil and gas resources as contemplated by State law. See *Hansen Bros. Enters. v. Bd. of Supervisors*, 12 Cal.4th 533 (1996). These vested rights include drilling of future wells, and re-drilling those wells and the existing wells, with such drilling and re-drilling in numbers and within timeframes based on the ability to recover these oil and gas resources. The City improperly seeks to limit these rights and to establish an arbitrary limit on both the number of wells and the time frame within which this work must be accomplished. Anything less than full recognition of Sentinel’s vested property rights is an unconstitutional taking of its property.

The decision in *Measure Z* is also instructive in the area of takings, since the court there found that prohibiting mineral rights holders and leaseholders from drilling new wells would preclude their ability to extract economic value from those property interests, and thus effect a regulatory taking. *Measure Z, supra*, at 43.

Finally, the City’s staff report and proposed Ordinance indicate that the City seeks to recoup its ostensible costs through a “Termination Fee,” and the City must remain mindful of the body of takings jurisprudence as it relates to the imposition of fees and exactions. The City should be well aware of the limitations imposed by the U.S. Supreme Court cases of *Nollan v. California Coastal Commission*, 483 U.S. 825 (1987) and *Dolan v. City of Tigard*, 512 U.S. 374 (1994), given its defeat in *Ehrlich v. City of Culver City*, 12 Cal.4th 854 (1996) (“*Ehrlich*”).

In *Ehrlich*, the California Supreme Court determined that the City failed to show the required rough proportionality between the magnitude of a fiscal exaction it sought to impose on a developer and the effects of the proposed development. The *Ehrlich* court, in finding that the *Nollan/Dolan* analysis applied to monetary exactions as well as land dedications, noted that the Culver City exaction had all the earmarks of impermissible *regulatory leveraging*. The court cited *Nollan* to explain this concept:

One would expect that a [permit] regime in which this kind of *leveraging* [i.e., the imposition of *unrelated* exactions as a condition for granting permit approval] of the police power is allowed would produce stringent land-use regulation which the State then waives to accomplish other purposes . . . .

*Ehrlich, supra*, 12 Cal.4th at 868, citing (and adding emphasis to) *Nollan, supra*, 483 U.S. at 837, fn. 5.

When considering the imposition of a “Termination Fee” here, the City cannot ignore the legal authorities protecting against regulatory takings, including takings in the form of unconstitutional monetary exactions.

### **11. Amortization Does Not Apply to the Extraction of Mineral Resources**

The City ignores the fundamental legal doctrine that would invalidate this proposed Ordinance – the diminishing asset doctrine. *See Hansen Bros. Enters. v. Board of Supervisors*, 12 Cal.4th 533 (1996). No case has held that amortization applies to eliminate a diminishing asset use. To the contrary, the California Supreme Court in *Hansen* recognized the “diminishing asset” doctrine and defined the scope of vested rights for mining, quarrying and other extractive uses, recognizing the unique qualities of extractive uses and holding that it includes an expansion of those uses.

As explained in the context of a quarry, the court in *Hansen* stated:

The very nature and use of an extractive business contemplates the continuance of such use of the entire parcel of land as a whole, without limitation or restriction to the immediate area excavated at the time the ordinance was passed. A mineral extractive operation is susceptible of use and has value only in the place where the resources are found, and once the minerals are extracted it cannot again be used for that purpose. “Quarry property is generally a one-use property. The rock must be quarried at the site where it exists, or not at all. An absolute prohibition, therefore, practically amounts to a taking of the property since it denies the owner the right to engage in the only business for which the land is fitted.”

*Hansen*, 12 Cal.4th at 553-54 (and cases cited therein).

Similarly, Sentinel’s vested oil and gas rights are uniquely situated in the Inglewood Oil Field, including the City portion of the IOF. The City’s proposed Ordinance seeks to terminate the extraction of those resources in the entire City, forever. Under the diminishing asset doctrine, Sentinel is entitled to produce oil and gas resources from the IOF until the resource is exhausted or otherwise uneconomical to produce -- the continued production of oil and gas resources is the expanded use and is protected under *Hansen*.

Furthermore, the City’s proposed prohibition on oil and gas uses in the entire City makes it impossible to extract those resources from any other location in the City (and it is unclear that they can be extracted from any other location outside the City). Thus, Sentinel’s operations cannot be relocated in another part of the City, a factor that was relevant in one other amortization case. *Los Angeles v. Gage*, 127 Cal.App.2d 442 (1954).

## **12. The City’s Proposed Amortization Period is Arbitrary and Unreasonable/Actual Investment Would Not Be Amortized Until After 2056**

Even assuming that amortization did apply to the extraction of mineral resources (and it does not), the five-year amortization period under the proposed Ordinance is unlawful because it is economically unsupportable and arbitrary. As the City must know, “an amortization period *is not* an absolute or unqualified defense to a takings claim.” *Levin Richmond Terminal Corp. v. City of Richmond*, 2020 U.S. Dist. LEXIS 156103, \*36-37, emphasis added. Rather, the legislation must provide a “reasonable amortization period commensurate with the investment involved.” *Id.*, quoting *Elysium Institute, Inc. v. County of Los Angeles*, 232 Cal. App. 3d 408, 436 (1991).

Relevant factors to be considered in determining whether an amortization period is unreasonable as applied to a particular property include amount of investment or original cost, present actual or depreciated value, dates of construction, amortization for tax purposes, salvage value, “remaining useful life, the length and remaining term of the lease under which it is maintained, and the harm to the public if the structure remains standing beyond the prescribed amortization period.” *Metromedia, Inc. v. City of San Diego*, 26 Cal.3d 848, 884 (1980).

Here, the City relied upon a memorandum prepared by the economic consulting firm of Baker & O’Brien (“B&O”) to justify the five-year amortization period. But the Baker & O’Brien report is riddled with flaws. Significantly, the Baker & O’Brien report ignores the substantial plugging and abandonment costs associated with the City IOF. (See “Review of the Baker & O’Brien Report” by Robert Lang of Alvarez & Marsal, dated August 13, 2020 (“Lang Report 2020”), Section 64.) Furthermore, even though the City took the better part of a year to consider the Lang Report 2020, the B&O response to the Lang Report 2020 continues to ignore the abandonment costs. (B&O June 8, 2021 Response to Technical Comments, attachment to staff report.) Wells are plugged and abandoned at the end of life of a field based on environmental and other regulations. The plugging and abandonment costs represent a significant capital investment to be incurred in the future, and to ignore those capital investments renders B&O’s study economically unsupportable and unreasonable. It is impossible to determine if or when amortization of capital investment (“ACI”) has occurred without including the costs of plugging and abandoning the City IOF wells.

Furthermore, despite the fact that any amortization period is required by law to be unique to the particular property involved, the B&O report is based on erroneous assumptions and is not based on actual data about Sentinel’s investment in the City IOF. With this letter, Sentinel submits the “Value Analysis of Sentinel Peak Resources California LLC’s Ownership in the Culver City Inglewood Oilfield and Analysis of Culver City’s Proposed Accumulated Capital Investment Calculation” by Robert Lang of Alvarez and Marsal Disputes and Investigations, LLC, dated June 17, 2021 (Lang Report 2021”). As the Lang Report 2021 details, using the “Strip Price Case,” Sentinel’s capital investment does not provide a reasonable rate of return, nor would it amortize before 2056. The Lang Report 2021 also evaluates a \$75 per barrel price case (which is not predicted by market analysts), and under that case, Sentinel’s capital investment would amortize in 2036.



Importantly, the challenges presented by the variability of the price of oil to establish an appropriate amortization period over the next several decades further support the point that the extraction of natural resources cannot be subject to amortization.

### **13. The City's Proposed Ordinance Triggers Other Constitutional Violations (Due Process, Equal Protection, Contractual Relations)/Section 1983**

#### **a. Equal Protection and Due Process**

The U.S. and California Constitution's guarantee equal protection of the laws and adequate due process. These rights also apply in the land use context. Cal. Const., Art. 1, § 7(a); U.S. Const. amend V, XIV; *College Area Renters & Landlord Ass'n v. City of San Diego*, 43 Cal.App.4th 677, 686 (1996). Substantive due process addresses improper governmental interference with property rights and irrational actions by government decision-makers. *Lingle v. Chevron U.S.A. Inc.*, 544 U.S. 528, 541 (2005); *Arnel Development Co. v. City of Costa Mesa*, 126 Cal.App.3d 330, 337 (1981).

Here, the proposed Ordinance imposes restrictions on oil and gas production in the IOF which do not appear to be rationally related to the existence of any environmental, health, or safety hazards. While the City alleges that nonconforming oil uses have "proven to be to the detriment of the public health, safety and welfare due to operational mishaps within the IOF," the City fails to provide any concrete examples of these purported "mishaps," nonetheless recent examples. Nor has the City explained how the proposed Ordinance is related to the existence of any concrete environmental impacts. Instead, the City merely states, without citing any evidence, that "elimination of oil uses throughout the City would result in a net reduction in greenhouse gas emissions, benefitting goals to reduce and manage emission that affect climate change and facilitate the City's compliance with State-mandated Climate Action requirements." *Id.* at p. 8.

Notably, phasing out oil and gas production in the City *will not* correlate with a "net reduction in greenhouse gas emissions," especially since the state continues to rely on significant imports of foreign oil, which is oftentimes more carbon intensive than oil produced in California. As explained in the Catalyst Report, "[R]eduction in California production of oil and gas, as proposed by this ordinance, leads to an increase in the imports by tanker ship to replace the lost domestic oil production. Considering life cycle greenhouse gas emissions, the increase in marine tankering leads to a net increase in greenhouse gas emissions." Catalyst Report at p. 1; *see also id.* at p. 4.

Further, greenhouse gas emissions are generated by other businesses and activities in the City, perhaps even the City's own projects, and yet, the City has not announced any plans to phase out the operations of those businesses. If the City seeks to regulate environmental issues in the City, it must do so in a way that treats similarly-situated persons similarly – it cannot single out one person or one business for unequal treatment. *See, e.g., Bateson v. Geisse*, 857 F.2d 1300, 1303 (9th Cir. 1988).

### **b. Impairment of Contractual Relations**

Both the U.S. and California Constitutions prohibit the enactment of laws effecting a “substantial impairment” of contracts, which applies to public contracts as well as contracts between private parties. *Alameda County Sheriff’s Assn. v. Alameda County Employees’ Retirement Assn.*, 9 Cal.5th 1032, 1074 (2020). Sentinel has contracts with various private parties, which impose obligations on Sentinel that continue beyond the date the amortization period expires. The proposed Ordinance will impair these contracts by forcing Sentinel to terminate its operations on the IOF by July 2026, which will undermine Sentinel’s reasonable expectations under the contracts.

### **c. The City’s Liability for Damages Under the Civil Rights Act**

The federal Civil Rights Act, 42 U.S.C. § 1983 (“Section 1983”), provides a cause of action for damages based on claims arising from violations of federal rights. *Svein v. Melin*, 138 U.S. 1815, 1822 (2018). As discussed at length herein, the proposed Ordinance will significantly impair Sentinel’s constitutional rights, including its right to just compensation, due process rights, and equal protection rights. Accordingly, if the City adopts the proposed Ordinance, the City will place itself at significant risk of liability under Section 1983, including for payment of damages suffered as a result of unreasonably phasing out oil and gas production in the City.

### **14. The City’s Refusal to Accept Annual Well Fees Constitutes an Unconstitutional Gift of Public Funds**

In the staff report, the City admits that it has not accepted the annual well fees, which constitutes a gift of public funds in violation of Article XVI, section 6 of the California Constitution. The cancellation of a debt may constitute a gift, even though nothing is literally handed over. *Westly v. U.S. Bancorp*, 114 Cal.App.4th 577, 582 (2003). Here, the City has relieved Sentinel of its duty to pay annual well fees, resulting, ironically, in a gift of public funds to Sentinel. No legislative action or enforcement action has relieved the City from its Constitutional obligations.

### **15. Void for Vagueness – What is Allowed Between 2021 and 2026?**

A land use ordinance cannot be so vague and uncertain that a person of common intelligence and understanding must guess as to its meaning. If this occurs, due process of law could be violated. *People v. iMERGENT, Inc.*, 170 Cal.App.4th 333, 339 (2009). This principle is essential to due process, which requires “clarity in regulation” and “invalidation of laws that are impermissibly vague.” *FCC v. Fox Television Stations, Inc.*, 567 U.S. 239, 253 (2012).

Here, the proposed Ordinance is unconstitutionally vague because it does not explain what activities are allowed between July 28, 2021, when the proposed Ordinance becomes effective, and July 28, 2026, when all nonconforming oil uses must be terminated. The proposed Ordinance merely states that “no drilling of new wells, redrilling or deepening of existing wells, or the erection of any derrick, structure or equipment related to oil and gas production, except as required to facilitate Termination of the nonconforming oil uses, shall be allowed after July 28,

2021,” and that in the interim, all oil and gas activities shall be conducted in compliance the Chapter 11.12 of the Zoning Code. However, directing operators to conduct interim activities in accordance Chapter 11.12 of the Zoning Code, which contains permit and operational requirements, does not answer the question of what interim oil and gas activities are allowed between July 28, 2021 and July 28, 2026. Accordingly, the proposed ordinance is unconstitutionally vague because it does not provide adequate notice of what interim conduct is allowed.

#### **16. Illegal and Void Use of the Police Power/No Legitimate Basis for Action**

While zoning and other land use controls are a legitimate subject for legislative consideration under the police power, they must be “reasonable in object and not arbitrary operation.” *La Mesa v. Tweed & Gambrell Planning Mill*, 146 Cal.App.2d 762, 768 (1956). Thus, the police power is not “illimitable and the marking and measuring of the extent of its exercise and application is determined by a consideration of the question of whether or not any invocation of that power . . . is reasonably necessary to promote the public health, safety, morals or general welfare of the people of a community.” *Miller v. Board of Public Works*, 195 Cal. 477, 484 (1925); accord *Griffin Dev. Co. v. City of Oxnard*, 39 Cal.3d 256, 272 (1985).

As detailed at length herein, the proposed Ordinance is not “reasonably necessary” to promote the public health, safety, and general welfare of residents in Culver City. Indeed, the City has not cited any studies demonstrating any negative public health or safety effects as a result of oil and gas operations in the IOF. Instead, the City appears to assume that for every barrel of oil and gas that is not produced in the City, that there will be a corresponding reduction in negative local impacts that would normally flow from that oil and gas. See Staff Report at 8 (“Further, elimination of oil uses throughout the City would result in a net reduction in greenhouse gas emissions . . .”) However, oil that is not sent to a refinery from the City will be replaced by an equal amount of oil that is transported over a much greater distance via oil train or oil tanker and the environmental impacts from such transportation combined with increased carbon content of such imported oil will result in a new increase in greenhouse gas emissions. See Catalyst Report at pp. 1-4. Thus, the City’s conclusion that the proposed Ordinance will promote public health and safety and improve the environment is unsupported.

Relatedly, it is worth noting that Sentinel’s operations in the City comply with extensive and stringent emission regulations enforced by the South Coast Air Quality Management District. These regulations are specifically designed to protect public health and safety by controlling air emissions and odors for people living and working near production facilities. Given that Sentinel already abides by the strictest environmental controls in the nation, the phase-out of oil and gas production in the City is not “reasonably necessary” to promote the public health, safety, and general welfare.

Moreover, as discussed in Section 5, *supra*, and the Catalyst Report, the CSD addresses the alleged public health and safety concerns articulated by the City, including by providing for an ombudsmen to respond to the public’s questions and concerns related to the oil field operations, creating a Community Advisory Panel, adopting a Community Alert Notification

System, and providing for rigorous environmental compliance monitoring and reporting.  
Catalyst Report at pp. 2-3.

Accordingly, the proposed Ordinance is an unlawful exercise of the City's police power because it is an oppressive and unreasonable means of accomplishing purported health and safety goals. Where the exercise of a city's police power "results in consequences which are oppressive and unreasonable, courts do not hesitate to protect the rights of the property owner against the unlawful interference with his property." *Skalko v. City of Sunnyvale*, 14 Cal. 2d 213, 215-16 (1939).

Sincerely,

A handwritten signature in blue ink that reads "Nicki Carlsen". The signature is fluid and cursive, with the first name "Nicki" being more prominent than the last name "Carlsen".

Nicki Carlsen

Attachments:

- Catalyst Environmental Solutions, Technical Memorandum (June 16, 2021)
- Alvarez & Marsal, LLC Report (June 17, 2021)
- EQAP Audit Reports (2011 – 2020)
- Baldwin Hills Community Standards District, Periodic Review (Sept. 2015)
- Baldwin Hills Community Standards District, Periodic Review II (Sept. 2019)
- Safety Inspection, Maintenance, and Quality Assurance Program Safety Audit (July 2016)
- Safety Inspection, Maintenance, and Quality Assurance Program Safety Audit (Aug. 2018)



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**Report of**

**Robert Lang**

**Alvarez & Marsal Disputes and Investigations, LLC**

**June 17, 2021**

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**Value Analysis of Sentinel Peak Resources California LLC's Ownership in the Culver City  
Inglewood Oilfield and Analysis of Culver City's Proposed Accumulated Capital  
Investment Calculation**

  
Robert Lang

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## I. INTRODUCTION

1. I was retained by Sentinel Peak Resources LLC, on behalf of Sentinel Peak Resources California LLC (“SPR”) to provide financial analyses in a matter related to the Inglewood oil field in the City of Culver City (the “City”). I was asked to review and provide my opinions regarding the Baker & O’Brien (“B&O”) report dated May 29, 2020, titled Capital Investment Amortization Study for the City of Culver City Portion of the Inglewood Oil Field (the “B&O 2020 Report”) and now B&O’s letter titled Response to Technical Comments to the Capital Investment Amortization Study for the City of Culver City Portion of the Inglewood Oil Field (the “B&O 2021 Report”). I issued a report dated August 13, 2020 on the topics covered in the B&O reports (the “August 2020 Report”).
2. I have also been asked to provide an independent calculation of the fair market value of SPR’s interest in the portion of the Inglewood Oil Field within the City’s boundaries, including a potential time frame to amortize SPR’s capital investment. I have also been asked to calculate the financial impact to SPR of any accelerated termination of oil and gas production operations within the City, including costs to plug and abandon the wells.
3. The analyses upon which I have based my opinions, as outlined in this report, have been performed by me or by individuals working under my direction and supervision.
4. Founded in 1983, Alvarez & Marsal (“A&M”) is a global professional services firm that helps clients in the corporate and public sectors solve financial and related problems. A&M has 66 offices located in 29 countries with more than 4,000 professionals. I am a Managing Director at A&M and work out of Dallas, Texas. I am experienced in financial, economic damage, and accounting matters related to the scope of my work on this matter. For more than 25 years, I have helped clients analyze complex commercial disputes and

measure the financial impact of external events, operational changes, and other market factors.

5. I received a B.B.A. from Baylor University and am a CFA (Chartered Financial Analyst) charter-holder. I am a frequent guest lecturer in the Graduate Accounting program at Baylor University, where I also serve on the Advisory Board for the Accounting and Business Law department.
6. I have assisted companies across a wide variety of industries and have particular expertise in the energy industry, dealing with matters throughout the product life cycle. I have assisted oilfield services, exploration and production (E&P), midstream, and downstream entities with valuation issues, transaction support/analysis, business interruptions, royalty disputes and many other matters.
7. Many of my prior engagements involve the measurement of value and quantifying the creation or destruction of value. I have analyzed the value of entities and assets ranging from oil & gas operations to steel mills to complex securities to the world's largest cancer tumor bank. I have performed these assignments for clients in the US, Canada, Mexico, South America, the Middle East, and Asia.
8. My resume at Attachment A provides a summary of my experience and credentials.

## **II. INFORMATION CONSIDERED**

9. This report expands on the points previously discussed in my August 2020 Report. Attachment B provides a list of the documents and information I have considered in preparing my report and supporting analyses. I may supplement and amend the opinions in this report in response to additional information received including the actual





income models, supporting workpapers and document references cited in both the B&O 2020 Report and B&O 2021 Report or to address issues raised later.

### III. LEGAL FRAMWORK

10. This report is to be considered in conjunction with the legal framework set forth in the letter submitted by Alston & Bird LLP on August 13, 2020.
11. As described in that letter, an existing use to extract natural resources (diminishing asset) cannot be eliminated through an amortization period because vested rights for a diminishing asset necessarily include an expansion of the use. To the extent that some form of amortization could apply to a diminishing asset, the fair market value to be amortized would be required to consider the expanded use, among other factors. This is further explained in the Alston & Bird letter dated June 17, 2021. For the purpose of this report, I have been asked to assume that an amortization calculation may be applicable, despite SPR's contentions that such a calculation is inappropriate for diminishing assets such as the subject assets in this matter.

### IV. SUMMARY OF OPINIONS

12. Based on the work performed to date, I have arrived at the following opinions:

Opinion 1: Based on current market conditions and using the "Strip Price Case", SPR's capital investment does not provide a reasonable rate of return or amortize before 2056, the year in which cash flow projections end. If the price of crude oil is approximately \$75 per barrel for all future periods ("\$75 Price Case"), SPR's capital investment would provide a reasonable rate of return and would amortize in 2036.

Opinion 2: If the City was to terminate the oil and gas operations of the City Inglewood Oil Field in the next five years as a result of B&O's purported ACI calculation, the financial damages to SPR would include, but are not limited to, the loss in market value and the accelerated end of life costs. These damages are currently calculated to be approximately \$14.6 million to \$15.9 million.

## V. BACKGROUND

13. Founded in 1917, the City is an incorporated city in Los Angeles County, California and is located within a few miles of downtown Los Angeles and the Los Angeles International Airport.
14. In 2016, SPR acquired the rights to multiple mineral leases and fee interests covering approximately 1,000 acres that allows SPR the exclusive right to explore, drill, and produce oil and gas in the Inglewood Oil Field ("IOF"). A small portion of this larger acquisition was located within the City limits (the "City IOF"), encompassing approximately 78 acres and 44 existing wells. I understand the City IOF represents the assets upon which the City is attempting to apply an "amortization of capital investment" or ACI limitation in order to terminate the oil and gas operations of the City IOF.
15. SPR does not own the IOF mineral rights, rather it leases the mineral rights from mineral interest owners. SPR pays royalties to the mineral owners based on the value of production from each mineral lease. Each year, SPR pays over 13,000 mineral interest owners in the IOF tens of millions of dollars in royalty payments.<sup>1</sup>

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<sup>1</sup> Future of the Inglewood Oil Field, available at <https://inglewoodoilfield.com/history-future/future-inglewood-oil-field/>

16. In addition to paying royalties, SPR pays ad valorem taxes to Los Angeles County and fees to the City. Between 2017 and 2020, the IOF was a source of approximately \$14.9 million in ad valorem taxes paid to Los Angeles County.<sup>2</sup> Additionally, SPR has paid or attempted to pay fees of approximately \$585,000 to the City since 2017.<sup>3</sup>
17. I understand the City has engaged B&O to assist with an ACI calculation with the intent to terminate the oil and gas operations by SPR in the City IOF.

## VI. SUMMARY OF B&O REPORTS

18. B&O was hired by the City to prepare a “Capital Investment Amortization Study” for existing oil and gas production facilities located in the City IOF. The B&O 2020 Report states “the information developed by [its] study will be considered by the City in its review of the possible termination of oil and gas operations within the City IOF”.<sup>4</sup>
19. The B&O 2021 Report offers minor clarifications to the initial report. As it is largely a reiteration of the 2020 Report, it is subject to the same methodological and assumption errors in that initial report. Namely, B&O relies on inaccurate assumptions regarding SPR operations and ignores one of the most significant operating costs (plugging and abandonment), both of which are fatal to the analysis. Generally, comments below regarding deficiencies in the B&O analysis apply to both reports.
20. An ACI calculation must first establish the amount of capital investment as of a certain date and then project future cash flows from that date to determine when sufficient cash

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<sup>2</sup> Provided by SPR.

<sup>3</sup> Provided by SPR.

<sup>4</sup> Capital Investment Amortization Study for the City of Culver City Portion of the Inglewood Oil Field, by Baker & O'Brien, dated May 29, 2020, pg. 2.

flows have been generated to cover both the capital investment and a “reasonable” rate of return to the investor. B&O defines ACI as occurring when,

*“cumulative income from an investment is sufficient to offset the initial capital investment and to provide a return on that investment to the owner. The income model uses the Internal Rate of Return and Net Present Value as tests to determine when ACI would occur.”*

21. In B&O’s calculation of the ACI, B&O has considered an assumed initial investment and applied an assumed required rate of return in both its Internal Rate of Return (“IRR”) and Net Present Value (“NPV”) calculations. While B&O draws a distinction between its IRR and NPV calculations and implies that since they have similar results, they support B&O’s calculation of ACI, the reality is that they are the same calculation. IRR is an NPV calculation. IRR and NPV are not two distinct calculations as implied by B&O. IRR and NPV are defined as follows:

*“Internal Rate of Return – a discount rate at which the present value of the future cash flows for the investment equals the cost of the investment.”*

*“Net Present Value – the value, as of a specific date, of future cash inflows less all cash outflows (including the cost of investment), calculated using an appropriate discount rate.”<sup>5</sup>*

22. The IRR and NPV calculations performed by B&O are inextricably connected and not independent calculations. Any implication otherwise is incorrect.<sup>6</sup>

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<sup>5</sup> Pratt, Shannon, Valuing a Business, Fifth Edition, pp 1072-1073.

<sup>6</sup> Hitchner, James R., Financial Valuation Applications and Models, 3<sup>rd</sup> Ed., pg 21.

23. B&O states in Section 5.2 of its 2020 report the need for the following data to prepare a reasonable income model and resulting calculation of ACI:

- Capital investments;
- Sustaining capital investments required to maintain production activity;
- Revenue (which means production volumes and price received);
- Changes in revenues due to market events;
- Operating expenses;
- Incomes taxes; and
- Market rates of return.

24. B&O reiterates in the 2021 Report it did not have access to the SPR/City IOF data necessary to accurately determine the items above and instead relied on public information, most of which is not specific to SPR and inaccurate.<sup>7</sup> As a result, B&O's ACI calculations fail to provide any meaningful information related to the City IOF. B&O's ACI calculations and sensitivity analyses are based largely on unsupported assumptions inserted into an income model that has no basis in reality. This is true of both the 2020 and 2021 Reports.

25. Furthermore, B&O excludes significant plugging and abandonment costs from its income model, which accelerates potential ACI timing.<sup>8</sup> B&O recognizes that plugging and abandonment costs represent capital investment, stating:

*“Plug and abandonment costs are required to safely and permanently remove a well from service and to restore the immediate area to its natural condition. These costs are considered to be capital investment. The income model used to determine the*

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<sup>7</sup> B&O 2021 Report, pg. 3.

<sup>8</sup> When abandoning a well there are generally plugging and abandonment costs as well as surface remediation costs and surface facility removal costs.

*timing of ACI does not include Plug and abandonment costs based upon SPR actual activity.”<sup>9</sup>*

26. Remarkably, B&O continues to ignore the significant plugging and abandonment costs associated with the City IOF in the B&O 2021 Report. Wells are plugged and abandoned at the end of life of a field based on environmental and other regulations. The plugging and abandonment costs represent a significant capital investment to be incurred in the future, and to ignore those capital investments renders B&O’s study unreliable and unreasonable.<sup>10</sup> It is impossible to determine if or when ACI has occurred without including the costs of plugging and abandoning the City IOF wells. Ignoring the costs to plug and abandon the wells artificially shortens the calculated time to ACI and inappropriately excludes future capital outlays required of the operator.
27. Additionally, B&O made at least the following unreasonable assumptions and errors that further render its analysis unreliable in both the 2020 and 2021 reports:
- Utilized oil and natural gas pricing that is above the current and expected market prices;
  - Underestimated operating costs;
  - Ignored any consideration of general and administrative costs;
  - Ignored end of life remediation costs and facility removal costs;
  - Underestimated income taxes;
  - Inappropriately assumed a 10 year useful life estimate of all City IOF wells; and
  - Presented sustaining capital and operating capital with no basis.
28. Each of these assumptions renders B&O’s ACI calculation of the City IOF unreliable and unreasonable. The B&O 2021 Report attempts to address these deficiencies, but

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<sup>9</sup> B&O 2020 Report, Section 5.4.4, at pg 16.

<sup>10</sup> Furthermore, any purported termination of oil and gas activities by the City would accelerate the capital investment associated with plugging and abandoning the wells in addition to halting the incremental revenues that would have been earned by SPR through the continued operation of the City IOF.

ultimately doubles down on the same erroneous assumptions. B&O simply does not have access to the data necessary to perform an accurate ACI calculation. The relevant data is included in the exhibits to this report and within my analysis.

29. Further, as these are the same sort of inputs that would be necessary in calculating a fair market value, had B&O attempted to arrive at a fair market value for the City IOF, which they did not, B&O would have been unable to arrive at any realistic assessment. By not considering the fair market value of the City IOF, B&O has ignored the continuing value of the City IOF once ACI is reached in its calculations.
30. I address the B&O calculations and assumptions in the following sections of this report. Further, I have adjusted B&O's ACI analysis, assuming that such an analysis may be appropriate. Finally, I prepare a calculation of the financial impact to SPR should the City terminate oil and gas operations of the City IOF.

## VII. BASIS FOR OPINIONS

**VII.A. Opinion 1: Based on current market conditions and using the "Strip Price Case", SPR's capital investment does not provide a reasonable rate of return or amortize before 2056, the year in which cash flow projections end. If the price of crude oil is approximately \$75 per barrel for all future periods ("\$75 Price Case"), SPR's capital investment would provide a reasonable rate of return and would amortize in 2036.**

31. Setting aside SPR's contention that ACI is not appropriate for oil and gas investments, I have been asked to evaluate the inputs and assumptions used in B&O's ACI calculation for the City IOF. I understand that ACI is premised upon the asset owner being allowed to recover its initial investment plus a "reasonable" rate of return. For income producing properties, the initial investment is made to buy/build the asset, and then income is

realized over the life of the asset. In theory, the cash flows subsequent to the initial investment allow the owner to continue to generate a return until such time as a “reasonable” return had been realized and the asset is then “amortized.”

32. However, the ACI concept is further complicated when applying it to oil and gas investments because of the abandonment and end of life costs that the operator is required to incur at the end of the asset life. These costs involve cash outlays at the end of the project to return the property back to its original condition. Naturally, these end of life costs change the total return realized on a project as the cash outflows must be included in any calculation of the return generated by the investment. For example, based on my analysis of SPR’s financial results for City IOF, SPR has realized an approximate 3 percent internal rate of return as of the end of 2020. Based on current market prices and projected production and costs in the future, the internal rate of return to SPR is projected to increase to approximately 23 percent as of 2026. However, these rates of return do not incorporate the end of life costs associated with the City IOF. Should the City amortize the City IOF, the end of life costs would be required to be expended by SPR soon thereafter. Incorporating the then-due end of life costs into the internal rate of return calculation results in a negative return to SPR.
33. Setting aside the possibility of amortization by the City, I understand SPR would continue to operate the City IOF many years into the future and would continue to realize positive cash flows (and the related return), which would be used to offset the end of life costs. “Amortizing” the City IOF prior to the end of the life of the asset alters the cash flow profile and causes the end of life costs to become immediately due and sooner than they otherwise would be incurred in the normal course of operations. As more fully described below, I have performed a calculation of ACI that models and incorporates the end of life costs.



34. My ACI calculations show the City IOF has not presently reached ACI and is unlikely to reach ACI (at least as of the year 2056 – the year SPR’s cash flow projections end) based upon current oil and gas prices.<sup>11</sup> However, my analysis also demonstrates that should the price of crude oil be \$75 per barrel for all future periods, SPR’s investment in the City IOF would amortize in or around the year 2036.
35. In order to calculate a rate of return on an investment and, in this case, amortize it, one must look at the capital invested to acquire the investment (along with the continued investment in the asset and accrued liabilities that were assumed) as compared to the resulting cash flows from that capital investment. SPR acquired the operations of the City IOF in 2016 and took over operations. At the time of the acquisition, SPR and Freeport McMoRan allocated a certain amount of the purchase price to the assets in the City IOF. It is common for the buyer and seller of oil and gas assets to negotiate values assigned to various well bores, future well locations, and other assets as part of the larger transaction. These values may not necessarily represent fair market value of those individual assets, but instead establish a value to be used for any title issues and for tax purposes. I have utilized the allocated purchase price as the initial investment amount.
36. Since acquisition, SPR has continued to make investments in the field as well as receive cash flows from the operations of the field. Additionally, SPR assumed the capital obligations to plug and abandon the wells once the IOF reaches end of life, which represents a significant future capital investment.
37. I have calculated the cashflows from the City IOF using historical cash flows through May 2021. I use forward looking estimates from June 2021 onward. The future cash flow

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<sup>11</sup> SPR’s current cash flow projections for the City IOF end in the year 2056 based upon economic assumptions within their model. This end date is not intended to represent the expected end of operations for the City IOF, but rather the last year in which cash flows are currently projected (35 years in the future).



projections are based on calculations from the ARIES Petroleum Economics Software (“ARIES”) utilized by SPR in the ordinary course of business.<sup>12</sup> These forward looking projections are commonly referred to as ‘reserve reports’ and use advanced modeling to forecast cash flows based on assumptions of future production, commodity prices, and operating and capital costs.

38. Future cash flows and the economic life of oil and gas wells are highly dependent on commodity prices. In general, when prices increase, the economic life of the well is extended as the revenues from production are able to continue to cover the operating and capital costs and result in positive cash flows. When prices decrease, wells may no longer be economical and could be shut in. Furthermore, as commodity prices increase, other reserves may become economical to develop through either the drilling of new wells or by recompleting or performing work on existing wellbores.
39. Many market participants, including exploration and production companies, consider and utilize the NYMEX futures contracts for oil and natural gas. As a base case, I have utilized the crude oil and natural gas pricing strip as of June 10, 2021 to forecast future cash flows (the “Strip Price Case”). A pricing strip represents trade prices into the future based on actual transactions in the market for that commodity. Brent Strip prices are commonly utilized by SPR in their regular course of business as a benchmark. The utilized strip is reflected in the table below:

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<sup>12</sup> ARIES is a financial software that combines reserves data and financial data to prepare a development plan and resulting cash flows.



Table 1 Brent Strip Pricing June 10, 2020		
Date Beginning	Date Ending	Cost per bbl
6/1/2021	12/31/2021	\$ 71.39
1/1/2022	12/31/2022	\$ 67.72
1/1/2023	12/31/2023	\$ 64.18
1/1/2024	12/31/2024	\$ 61.78
1/1/2025	12/31/2025	\$ 60.24
1/1/2026	12/31/2026	\$ 59.40
1/1/2027	12/31/2027	\$ 59.07
1/1/2028	12/31/2056	\$ 58.97

40. To understand the impact to future cash flows and the resulting effect on the ACI calculation, I have also utilized a flat price forecast of \$75 per barrel for crude oil for all periods (the “\$75 Price Case”). I included this additional scenario to demonstrate the sensitivity of the cash flows to changes in commodity prices.

41. I relied upon historical results and then requested that SPR utilize its ARIES software to generate the future cash flows based on certain assumptions. The ACI calculation inputs are as follows:

VII.A.1. Invested Dollars

VII.A.1.a. Purchase Price

42. As previously discussed, the City IOF was only part of a larger purchase of numerous wells in 2016. SPR and Freeport McMoRan allocated \$2,245,160 of the acquisition price to the wells within the City IOF. I have utilized this amount as the original investment cost.



VII.A.1.b. Facility and Maintenance Capital

43. Facility and maintenance capital are spent on an annual basis to maintain and improve well operations and surface facilities. These costs are recorded at a field-wide level and are not tracked to specific wells. In the ordinary course of business, SPR estimates the future facility and maintenance capital expenses for the entire field. I utilized these expenses and calculated a cost per barrel of oil equivalent (“BOE”) in order to allocate these costs to the City IOF wells. Based on SPR’s historical and projected facility and maintenance capital expenditures for the IOF, the facility and maintenance capital are estimated at approximately \$1 to \$2 per net BOE per year.

VII.A.1.c. Recompletion Capital

44. Recompletion capital is spent to improve production from existing wellbores. SPR has projected capital will be spent on certain City IOF wells during 2024 and beyond. I have included these expenditures in my ACI calculation.

VII.A.1.d. Annual Abandonment Capital and End of Life Costs

45. SPR’s well abandonment process within the City IOF is dictated by individual oil and gas leases and is heavily regulated and governed by a multitude of agencies including the State of California Department of Geologic Energy Management (CalGEM) as well as SPR’s voluntary compliance with regulations by the County of Los Angeles and the Baldwin Hills Community Standards District. The rules in place for the Inglewood Oil Field are some of the strictest in the world. When wells are no longer producing for a period of time or at the end of the life of the oilfield, operators are required to plug and abandon the wells, remove any surface facilities, and restore the surface to a reasonable condition. In addition to California’s established abandonment procedures, abandoned

wells within the Inglewood Oil Field are also subject to annual soil gas monitoring, the testing of soils above well caps for vapors that could signal a leak. These abandonment activities and the anticipated costs associated with owning the wells are not incurred until the wells are no longer in use.

46. From 2016 through present, SPR has not plugged and abandoned any wells in the City IOF. There are currently 44 wells within the City limits. SPR estimates it will cost approximately \$180,000 to plug and abandon each well. However, there are many unknown variables that could increase the plugging and abandonment costs for each well or individual wells. Using the ARIES software, SPR has estimated the date on which it anticipates plugging each of the wells. I have utilized these projected cash outflows in the calculation of ACI.
47. At the end of operations, the operator incurs costs related to surface remediation and to remove any surface facilities. SPR has obtained an estimate from Leighton Consulting related to the cost to remediate and restore the City IOF well sites that ranges from \$1.3 million to \$2.6 million. SPR also obtained an estimate from BHL Industries, Inc. for the dismantling and removal of surface facilities related to the City IOF that totals \$224,000. I have utilized these costs in determining the total end of life obligations.

#### VII.A.2. Operating Cash Flows

48. I have utilized historical cash flows through May 2021 and projections of future cash flows from that point forward.

##### VII.A.2.a. Production Volumes and Revenue

49. I have used historical oil and gas production for the period through May 2021. From June 2021 forward, oil and gas production was estimated using SPR's ARIES software.

50. Historical revenue through May 2021 is based upon actual production and prices received. Future revenue is based on the two pricing scenarios and utilizes a price basis differential of a positive \$1.00 per barrel, a marketing differential of a negative \$2.31 per barrel for oil and a price basis differential of a positive \$0.16 per thousand cubic feet (“Mcf”) for gas to account for the price differences between the index benchmarks and the amount realized for production from the City IOF. Revenue amounts are presented after deductions for royalty payments and after payments to entities/individuals with other types of interests (e.g. net profit interests).

VII.A.2.b. Lease Operating Expenses

51. Lease operating expenses (“LOEs”) are comprised of the costs to operate the City IOF wells and are comprised of both fixed and variable costs. I have relied on the historical LOEs as provided by SPR for the period through May 2021. The periods after May 2021 are forecasts of LOEs based on the historical amounts. The assumed fixed LOE costs per well per month are shown in the table below:

Table 2 Fixed Lease Operating Expenses		
Date Beginning	Date Ending	Cost
6/1/2021	1/1/2022	\$ 3,839
1/1/2022	1/1/2027	3,975
1/1/2027	1/1/2032	4,075
1/1/2032	1/1/2037	4,148
1/1/2037	1/1/2042	4,202
1/1/2042	1/1/2047	4,243
1/1/2047	To Life	4,432

52. SPR projects variable operating costs of \$9.92 per barrel of oil through late 2028 and \$11.45 per barrel of oil thereafter. The City IOF utilizes waterflood recovery methods and incurs



variable operating costs of \$0.076 per barrel of water as a result. In total, the variable and fixed operating costs equate to approximately \$29 to \$33 per BOE, depending on the pricing scenario. This projected operating cost is in line with the historical LOEs for the City IOF which averaged approximately \$28 per BOE from January 2017 through May 2021.

#### VII.A.2.c. Ad Valorem Taxes

53. Ad valorem taxes are based on historical data through May 2021, and are projected in the future utilizing a tax rate of 4.9 percent. The ad valorem taxes have also been included in the ARIES software model runs.

#### VII.A.2.d. Severance Tax

54. Severance taxes are based on historical SPR data through May 2021, and projected in the future utilizing the California statutory rate of \$0.6788584 per barrel for oil and natural gas liquids and \$0.06788584 per Mcf of gas. These amounts are included in the ARIES models.

#### VII.A.2.e. General and Administrative Cost

55. SPR incurs certain general and administrative (“G&A”) costs in operating the City IOF wells. These costs include items such as accounting personnel, accounting software, supplies, utilities, and office rent. These amounts represent costs incurred by SPR in order to conduct its various operations. G&A costs represent a necessary expense associated with the operations of the City IOF and I have included an allocation of G&A costs in the ACI calculation.

#### VII.A.2.f. Income Taxes

56. Income taxes are calculated based on an assumed federal income tax rate of 37 percent and a California state income tax rate of 13.3 percent, or a combined rate of 50.3 percent. In the calculation of taxable income depreciation, depletion, and amortization are estimated at five percent of revenues.

#### VII.A.3. End of Life Costs

57. End of life costs refer to all amounts that must be expended by the operator to remove the wellbore and surface facilities and return the well site to its original condition. These costs must be accounted for in any evaluation of the cash flows of an oil and gas property in order to determine the actual return or profitability of a project. The remaining end of life costs must be considered in any ACI calculation in each year as they are required and expected costs the operator will incur at the end of operations.

58. As previously discussed, the end of life costs include plugging and abandonment costs, surface equipment removal and remediation costs. These costs must be added to the historical cash flows to evaluate whether the City IOF has amortized.

#### VII.A.4. ACI Calculation Results

59. I utilized each of the above inputs and assumptions in the ACI calculation. Based on my analysis, SPR's investment in the City IOF has not amortized as of the end of 2021 and is not likely to amortize based on the current and expected market conditions in the energy industry. SPR's cash flow modeling (using current market prices and the expected recoveries based on current technology) goes through year 2056 and demonstrates that the City IOF is not expected to reach amortization as of that date.



60. While the City IOF wells have generated positive cash flow as of the end of 2020 in excess of the allocated purchase price, significant future end of life obligations exist that must be considered. The recognition of these end of life costs in the ACI calculation is different from how they would be experienced otherwise. While an oil or gas field would typically be operated until the wells are no longer economic to produce and in the process covering the end of life obligations, the forced recognition of the end of life costs before the end of the economic viability of the oil field results in a large set of expenses being recognized far earlier than they would be realized in typical operations. The premise of ACI (*i.e.* the taking of an asset after it has reached a determined return) causes the end of life costs to be incurred years before (at the point of ACI) they otherwise would have been incurred (at the end of the field's life). This is an unavoidable flaw when applying the ACI model to an oil field and an indication that ACI is an inappropriate approach in this context. When these end of life costs are included, the resulting cash flow is negative as of 2020 and is not projected to turn positive in the future. In short, unless commodity prices increase well above current market conditions, the City IOF wells are not projected to generate enough cash flow to realize a reasonable rate of return on the initial investment plus the ongoing capital costs.<sup>13</sup>
61. I have also performed an ACI calculation under the \$75 Price Case, which illustrates the impact on the ACI calculation for changes in commodity prices. As shown in the \$75 Price Case, it is possible to achieve ACI in the City IOF with positive total cash flow and a reasonable rate of return in or around 2036.<sup>14</sup> This case assumes a price of oil at \$75 per barrel from June 2021 through year 2036, which is currently not anticipated by market participants.

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<sup>13</sup> See Exhibit 1 for the ACI calculation associated with the Strip Price Case.

<sup>14</sup> See Exhibit 2 for the ACI calculation associated with the \$75 Price Case.

62. In summary, the City IOF has not presently reached ACI and is not likely to reach ACI. Should oil prices experience an increase from the present price estimates of around \$60-\$70 per barrel to approximately \$75 per barrel for the entire time period, the City IOF could reach ACI in approximately 16 years (assuming costs and capital expenses do not increase significantly).

**VII.B. Opinion 2: If the City was to terminate the oil and gas operations of the City Inglewood Oil Field in the next five years as a result of B&O's purported ACI calculation, the financial damages to SPR would include, but are not limited to, the loss in market value and the accelerated end of life costs. These damages are currently calculated to be approximately \$14.6 million to \$15.9 million.**

63. SPR has asked me to quantify the damages to SPR should the City terminate oil and gas operations of the City IOF on an accelerated basis as a result of B&O's purported ACI calculation. I have quantified the damages to SPR for a potential amortization of the City IOF in two categories: i) the loss of the fair market value of the City IOF and ii) the costs that SPR would incur to terminate oil and gas operations in the City IOF. First, should the City amortize the field, the City IOF will have no future value (as operations will cease) and SPR will lose the current market value of the asset. Second, the termination of operations will cause SPR to incur all of the end of life costs immediately. The combination of these two elements represent the financial damages to SPR.

64. The City IOF is currently generating positive cash flows for SPR that are used to offset capital expenditures and end of life costs. The longer SPR continues to operate the field, the more cash flow it realizes to offset the future end of life costs.

### VII.B.1. Current Value of the City IOF

65. In order to determine the current value of the City IOF, I have relied on the income approach.<sup>15</sup> Using the same cash flow projections as in my ACI calculation with the Strip Price Case, I forecasted the future cash flows associated with the City IOF. I modeled operating cash flows and included facility and maintenance capital expenditures, plugging and abandonment costs, the average of the surface remediation cost estimates, and surface facility removal costs. I then discounted the future cash flows to present value using a discount rate of 16 percent.
66. I determined the discount rate based on a calculation of the weighted average cost of capital associated with a hypothetical buyer and giving consideration to the asset specific risk of the City IOF.
67. Based on my analysis, the City IOF currently has a value of approximately \$5.16 million. This value takes into consideration the projected operating cash flows associated with the wells, in addition to estimates of future capital and end of life costs.
68. The value of the City IOF is highly dependent upon commodity prices. Currently depressed commodity prices have significantly impacted the cash flows of the City IOF. Each dollar change in the commodity prices dollar-for-dollar changes the profitability and cash flows from the City IOF. As commodity prices are expected be lower in the future, the future expected cash flows from the City IOF are lower than previous years' cash flows, thereby reducing any expected returns to the SPR. Alternatively, if

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<sup>15</sup> The other two valuation methods are the market approach and the cost approach. The market approach uses market transaction prices and other relevant information generated through actual market transactions involving comparable assets and operations during the relevant time frame. The asset approach (sometimes referred to as the cost approach) estimates the value of a company's existing assets on an individual basis by adjusting the company's balance sheet to fair market value. I did not identify any relevant market transactions comparable to the City IOF.

commodity prices were to improve in the future, the value of the field would likely increase as the additional revenue should directly increase the profits and cash flow.

69. Utilizing current strip prices of oil and gas and discounting the future cash flows at a rate of 16 percent results in a net present value of approximately \$5.16 million, which is the current value of the City IOF to SPR.<sup>16</sup> This quantification is based upon the assumption that the City IOF continues to operate into the future and is not subject to amortization. It is the amount a hypothetical buyer would pay for the asset, with the assumption that the buyer could continue to operate in the future, just as the asset has been operated in the past. The hypothetical buyer would also be responsible for all of the future end of life costs. Should the City amortize the City IOF, SPR will lose the entire amount of the current fair market value, resulting in a loss to SPR of approximately \$5.16 million (the difference in the current value and zero).

VII.B.1.a. Value of the City IOF if oil and gas operations are terminated by the City

70. In addition to the loss in market value of the asset, if the City were to terminate oil and gas operations of the City IOF in the near future, SPR would be required to immediately (or in the very near future) incur the end of life costs to return the well sites to their original condition.
71. SPR's current estimate of the end of life costs ranges from approximately \$9.4 million to \$10.7 million. These costs represent necessary and required expenses as a result of the City IOF reaching end of life. These costs are currently expected to occur over multiple years beginning in or around 2025. However, terminating oil and gas operations of the City IOF accelerates these costs to the near future. I have used the same estimated costs

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<sup>16</sup> See Exhibit 3.



related to plugging and abandonment, surface equipment removal and remediation costs as used in my ACI calculations.

VII.B.2. Calculation of Cost to SPR of Termination of Oil and Gas Operations by the City in the Near Future

72. As stated above, the financial impact to SPR resulting from the termination of oil and gas operations of the City IOF is quantified in two categories: i) the loss of the fair market value of the City IOF and ii) the costs that SPR would incur to terminate oil and gas operations in the City IOF.
73. Should the City IOF be amortized by the City, the financial damages to SPR are between approximately \$14.6 million and \$15.9 million, as shown in the table below.

<b>Table 3</b>		
<b>Calculation of the Damages to SPR for the City Terminating Oil and Gas Operations of the City IOF (Thousands \$)</b>		
	<b>Low End of Range</b>	<b>High End of Range</b>
Lost Market Value of the City IOF	\$ 5,163	\$ 5,163
Plus Accelerated End of Life Costs:		
Abandonment Costs	7,920	7,920
EOL Environmental Remediation Costs	1,300	2,600
EOL Surface Facilities Costs	224	224
Estimated End of Life Costs	9,444	10,744
<b>Damages to SPR</b>	<b>\$ 14,607</b>	<b>\$ 15,907</b>



74. It is also important to note that this estimation of the damages to SPR for the termination of oil operations of the City IOF does not include the impact to royalty or net profit interest owners. Royalty owners receive an agreed upon percentage of the production value, as determined by their lease agreements. Net profit interest owners received a portion of the net profits of the field. Should the City terminate oil and gas operations in the City IOF, these interest owners will have lost all future revenue associated with future production from the field.<sup>17</sup>

## VIII. ADDITIONAL INFORMATION

75. Our analysis is ongoing, and I reserve the right to supplement my findings and modify my opinions as our work continues and as additional information becomes available.
76. This report is solely for use in connection with the above referenced matter and it is not to be distributed or referred to for any other purpose outside of this matter without the express written consent of A&M. I may prepare and utilize a variety of charts and graphs to demonstrate my opinions and calculations.

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<sup>17</sup> The royalty owners may have separate claims against the City that have not been quantified in this analysis.



**Robert Lang, CFA, ABV**  
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For the past 25 years, Robert has been trusted by attorneys and companies to analyze complex commercial disputes and measure the financial impact of external events, operational changes, and other market factors. He has served as an expert and testified in high profile cases involving hundreds of millions of dollars and has led large investigations into complex economic and accounting issues.

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#### **Certification**

Chartered Financial Analyst (CFA)

Accredited by AICPA in Business Valuation (ABV)

#### **Professional History**

Navigant Consulting  
(2010 – 2016)

UHY Advisors  
(2005 – 2010)

Arthur Andersen/FTI Consulting  
(1995-2005)

#### **Professional Affiliations**

CFA Society

CFA Society of Dallas

American Bar Association  
Commercial Litigation—  
Energy Committee

#### **Education**

Baylor University,  
BBA—Financial Services

Robert has assisted companies across a wide variety of industries and has a particular expertise in the energy industry, dealing with matters throughout the product life cycle. Robert has assisted oilfield services, E&P, midstream, and downstream entities with valuation issues, transaction support/analysis, business interruptions, royalty disputes and many other matters.

Many of Robert's cases involve the measurement of value and quantifying the creation or destruction of value. He has analyzed the value of entities and assets ranging from oil & gas operations to steel mills to complex securities to the world's largest cancer tumor bank. He has performed these assignments for clients in the US, Canada, Mexico, South America, the Middle East and Asia.

Robert serves as a guest lecturer in the Graduate Accounting program at Baylor University, where he also serves on the Advisory Board for the Accounting and Business Law department. He is a frequent speaker, author, and instructor on oil and natural gas issues, valuation, and financial analysis.

Representative practice areas and example engagements include:

#### **Energy Related Disputes**

- Conducted valuation analysis and testified as an expert for an energy industry client regarding the value of lost opportunities.
- Analyzed project economics and calculated damages on behalf of an oil field services company involved in converting natural gas into clean diesel. Analyzed the impact of several interruptions on the project.
- Performed several calculations of damages and testified at jury trial regarding contract losses and fraud damages suffered by an oilfield services company in the Fayetteville Shale.
- Calculated contract damages in a pricing dispute between a Marcellus natural gas fracking operator and an oilfield services company.
- Analyzed the impact of alleged negligence by a drilling operator on the

economics of a project in the Monterrey Shale. Testified as an expert on resulting cost increases and overall impact to the project.

- Analyzed damages and drafted expert report on over \$150mm of economic losses suffered by a refinery. Analysis included review of economic and operational issues leading to bankruptcy and determination of resulting losses.
- Assisted a major Barnett Shale natural gas producer faced with hundreds of royalty litigation cases regarding midstream deductions. Analyzed gathering costs including review of cost of service model used to determine cost. Evaluated reasonableness of terms, including targeted rate of return, negotiated with the midstream company after producer spun it out into a separate entity. Reviewed net wellhead prices and reasonableness of all deductions. Analyzed impact of trading operations on royalty payments.
- Assisted a litigation trust with financial advisory and litigation related to the bankruptcy of a coal producer. Reconstructed the accounting environment of the bankrupt entity, analyzed more than 50 entities and thousands of related party transactions, performed solvency and valuation analysis, and calculated damages.
- Calculated damages and provided expert testimony in a large claim on behalf of an offshore oil & gas operator in litigation over repair, rebuild, and pollution cleanup costs.
- Assisted a major oil and gas client in developing a “net-back pricing” model for litigation that tracked the delivery of and payment for product originating in 4,000 wells and covering five pricing pools over seven years.
- Conducted royalty audits and performed numerous damage calculations in royalty disputes on behalf of major oil and gas clients.
- Constructed a highly complex model and calculated damages in a dispute over appropriate reductions in calculating natural gas liquids royalties.
- Calculated lost business value and provided expert opinion regarding the construction of fueling stations for a major airline.
- Calculated damages and drafted expert report to determine the lost profits suffered by a refinery as a result of contractor negligence and the resulting inability to produce cyclohexane and paraxylene. Analysis included an estimation of “but for” market prices in the absence of the supply shock.



- Calculated lost profits and performed valuations in a dispute between a major oil and gas company and numerous franchised service stations.
- Assisted oilfield services company with complex database analysis to identify and characterize competing sales in an anti-trust matter.

### **Valuation, Forensic Accounting and Commercial Damages**

- Analyzed damages and testified as an expert regarding the lost business value suffered by a radiology management provider that resulted from an alleged faulty installation of Customer Relationship Management software.
- Determined lost research value suffered by medical school following a tropical storm. Testified as an expert on over \$100mm of losses when claim was litigated. Judge ultimately awarded the exact damage calculation.
- Analyzed damages and testified as an expert regarding lost business value in a dispute between former business partners of a consumer products company.
- Served as court-appointed auditor in an alleged real-estate investment Ponzi scheme. Traced funds, identified improper transfers, and analyzed distributions within over 100 investment and development funds.
- Performed analysis and testified at trial regarding an alleged Ponzi scheme involving 1031 exchange investments and alleged violations of the Texas Securities Act.
- Performed valuation analysis and testified in bench trial regarding the difference in standard and liquidated values.
- Calculated damages and testified regarding damages suffered by a warehouse equipment distributor due to an alleged breach of contract.
- Analyzed and investigating facts, documents, and damages in a False Claims Act matter.
- Calculated damages and investigated allegations in a healthcare quit am action.
- Analyzed lost profits suffered by a regional airline that resulted from non-performance of a software vendor that was engaged to install an ERP system.
- Developed damage analysis and drafted expert report regarding an

investment fund's participation in a regional shopping mall as compared with suitable alternative investments.

- Assisted a multibillion-dollar underwriter in litigation regarding the profitability of its automotive extended-warranty business and the causes of decreasing margins.
- Quantified damages for defendant in a breach of contract suit concerning the distributorship agreement of a large athletic shoe company.
- Performed analysis of tracking data collected from a website in a class action lawsuit alleging deceptive billing practices against a dating website.

### **Bankruptcy Litigation and Restructuring**

- Designated as an expert and performed valuation and solvency analysis in a dispute between a trustee and the previous owners of a multi-billion dollar telecommunications company.
- Calculated damages, rebutted opposing expert's calculation of lost business value, and analyzed solvency issues for a telecom company concerning a breach of contract with a developer of GPS technology who claimed the alleged breach forced bankruptcy.
- Analyzed debtors' plans for reorganization while working on behalf of creditors' committees in several bankruptcy matters.
- Advised a large manufacturer in restructuring various operations and financial structure.
- Developed damage model, refuted opposing expert's analysis, and drafted expert report for a utility industry client concerning the valuation of an acquired security alarm company and the impact of the software on the operations of the business.
- Analyzed transactions and calculated damages alleged by several municipalities against the investment bank that assisted in bond issuances.

### **Insurance and Construction Claims**

- Assisted numerous clients in preparing insurance claims and negotiating settlements for business interruption and property damage totaling nearly \$1 billion. Served as the National Practice Leader for the Business Insurance Claims practice of a large accounting firm. Clients have included oil and gas processing facilities and refineries, cogen facilities,

universities, hotels, hospitals, retailers, engine manufacturer, cement plant, power plant, steel plants, retailers, grocery stores, golf clubs, and numerous other manufacturers.

### **General Strategic and Business Advisory**

- Helped a textile manufacturer identify the causes of lagging profits, streamline operations, reduce throughput, determine which plants to close, and determine the impact to shareholder value of the recommendations.
- Assisted several start-up businesses in formulating business plans, building financial infrastructure and structuring the financing.
- Assisted several growing private companies in securing private placements of additional capital.

### **Publications**

- Low Crude Oil Price Impacts: Market Dynamics, Economic Implications, and Disputes, May 2015.
- The Shale Energy Revolution: A Lawyer's Guide, Chapter 3—Common Contractual Disputes-Royalty Disputes.
- Rising Tide: Litigation Wave from Low Oil Prices & Economic Implications, May 2015
- Gas Royalty Disputes on the Rise, NG Market Notes, April 2014
- Unconventional Oil & Gas Litigation Trends, A Geographical View, ABA Panel Moderator, July 2014
- Gas Royalty Disputes, Energy Law Advisor Volume 8 No. 3, July 2014
- Trends Emerging from Unconventional Oil & Gas Resources, ABA Energy Litigation Article, July 2014
- Capital Investment Decisions in Oil and Gas, April 2014
- Trends and Outlook for Shale Oil & Gas, New York County Lawyer's Association, February 2014
- Primer on Shale Oil & Gas, Industry Trends and Outlook, San Diego, California, September 2014



## **Attachment B Documents Considered**

### **Reports**

- Capital Investment Amortization Study for the City of Culver City Portion of the Inglewood Oil Field, by Baker & O'Brien, dated May 29, 2020
- Review of the Baker & O'Brien Report, by Robert Lang, dated August 13, 2020
- Response to Technical Comments to the Capital Investment Amortization Study for the City of Culver City Portion of the Inglewood Oil Field, prepared by Baker & O'Brien, dated June 8, 2021

### **Letters**

- Letter submitted by Alston & Bird LLP dated August 13, 2020
- Letter submitted simultaneously by Alston & Bird LLP dated June 17, 2021

### **Culver City Documents**

- City of Culver City Staff Reports with Details for 6/17/2021 Meeting, dated June 9, 2021
- RESOLUTION NO. 97-P001, AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF CULVER CITY, CALIFORNIA, APPROVING ZONING CODE AMENDMENT P2021-0036-ZCA, AMENDING CULVER CITY MUNICIPAL CODE (CCMC) TITLE 17: ZONING CODE; SECTION 17.610.010.D – NONCONFORMING OIL USE, TO TERMINATE NONCONFORMING OIL AND GAS USES BY JULY 28, 2026.

### **Received from Sentinel Peak Resources California LLC**

- City IOF allocated investment price from the sale of the IOF between Freeport McMoRan and Sentinel Peak Resources California LLC
- Sentinel Peak Resources California LLC historical revenue and expense and investment data for the IOF and City IOF, 2016 through May 2021
- Sentinel Peak Resources California LLC inputs and assumptions used in the ARIES Petroleum Economics Software to generate reserve reports.
- Sentinel Peak Resources California LLC reserve reports or future cash flow projections based on calculations from the ARIES Petroleum Economics Software for the IOF and City IOF utilizing on the Brent Strip Price and \$75/bbl flat price
- Sentinel Peak Resources California LLC ad valorem taxes paid related to the IOF
- Sentinel Peak Resources California LLC schedule of payments to Culver City

### **Publicly Available Material**

- Brent Crude Oil Futures Settlements, June 10, 2021
- Duff & Phelps Cost of Capital Navigator
- Damodaran Online, <http://pages.stern.nyu.edu/~adamodar/>
- Future of the Inglewood Oil Field, available at <https://inglewoodoilfield.com/history-future/future-inglewood-oil-field/>



**Attachment B**  
**Documents Considered**

<b>Reference Materials</b>
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- Hitchner, James R., Financial Valuation Applications and Models, 3rd Ed.
- Pratt, Shannon, Valuing a Business, Fifth Edition

## Exhibit 1

### Calculation of Amortization of Capital Investment: Strip Price Case

	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
<i>(\$ in thousands)</i>										
<b>Total Culver City Investment</b>										
Acquisition Price	\$ (2,245)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
(-) Maintenance Capital	-	(34)	(145)	(195)	(67)	(122)	(69)	(69)	(72)	(73)
(-) Recompletion Capital	-	-	-	-	-	-	-	-	(119)	-
(-) Abandonment Capital	-	-	-	-	-	-	-	-	-	(180)
(-) EOL Remediation and Facilities	-	-	-	-	-	-	-	-	-	-
<b>Invested Dollars</b>	<b>(2,245)</b>	<b>(34)</b>	<b>(145)</b>	<b>(195)</b>	<b>(67)</b>	<b>(122)</b>	<b>(69)</b>	<b>(69)</b>	<b>(191)</b>	<b>(253)</b>
<b>Cumulative Invested Dollars</b>	<b>(2,245)</b>	<b>(2,279)</b>	<b>(2,424)</b>	<b>(2,619)</b>	<b>(2,685)</b>	<b>(2,807)</b>	<b>(2,877)</b>	<b>(2,946)</b>	<b>(3,137)</b>	<b>(3,390)</b>
<b>Culver City Operating Cash Flow</b>										
Net Revenue	-	3,167	3,880	3,845	2,067	3,507	3,624	3,475	3,542	3,541
(-) LOE	-	(1,681)	(1,618)	(2,003)	(1,434)	(1,701)	(2,031)	(2,050)	(1,868)	(1,848)
(-) Ad Val Tax	-	(56)	(56)	(142)	(86)	(171)	(203)	(192)	(190)	(187)
(-) Severance Tax	-	(31)	(34)	(38)	(42)	(42)	(43)	(43)	(45)	(45)
(-) G&A Allocation	-	(278)	(340)	(310)	(250)	(425)	(439)	(421)	(429)	(429)
<b>Cash Flow Before Capital</b>	<b>-</b>	<b>1,122</b>	<b>1,832</b>	<b>1,352</b>	<b>255</b>	<b>1,167</b>	<b>909</b>	<b>769</b>	<b>1,009</b>	<b>1,032</b>
(-) Income Taxes	-	(467)	(751)	(485)	(43)	(437)	(331)	(264)	(323)	(303)
<b>Cash Flow Available to Distribute</b>	<b>\$ -</b>	<b>\$ 654</b>	<b>\$ 1,081</b>	<b>\$ 867</b>	<b>\$ 212</b>	<b>\$ 730</b>	<b>\$ 578</b>	<b>\$ 504</b>	<b>\$ 687</b>	<b>\$ 729</b>
<b>Cumulative CFATD</b>	<b>\$ -</b>	<b>\$ 654</b>	<b>\$ 1,735</b>	<b>\$ 2,602</b>	<b>\$ 2,814</b>	<b>\$ 3,544</b>	<b>\$ 4,122</b>	<b>\$ 4,626</b>	<b>\$ 5,312</b>	<b>\$ 6,042</b>
<b>Cash Flow After Acquisition and Capex</b>	<b>\$ (2,245)</b>	<b>\$ 620</b>	<b>\$ 936</b>	<b>\$ 672</b>	<b>\$ 146</b>	<b>\$ 608</b>	<b>\$ 508</b>	<b>\$ 435</b>	<b>\$ 496</b>	<b>\$ 476</b>
Internal Rate of Return		-72%	-20%	0%	3%	11%	16%	18%	21%	22%
<b>Cumulative Total Cash Flow</b>	<b>\$ (2,245)</b>	<b>\$ (1,625)</b>	<b>\$ (689)</b>	<b>\$ (17)</b>	<b>\$ 129</b>	<b>\$ 736</b>	<b>\$ 1,245</b>	<b>\$ 1,680</b>	<b>\$ 2,176</b>	<b>\$ 2,652</b>
Remaining Abandonment Cost	(7,920)	(7,920)	(7,920)	(7,920)	(7,920)	(7,920)	(7,920)	(7,920)	(7,920)	(7,740)
EOL Surface Remediation Costs	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)
Capital to Remove Facilities	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)
<b>Total End of Life Cost</b>	<b>\$ (9,444)</b>	<b>\$ (9,444)</b>	<b>\$ (9,444)</b>	<b>\$ (9,444)</b>	<b>\$ (9,444)</b>	<b>\$ (9,444)</b>	<b>\$ (9,444)</b>	<b>\$ (9,444)</b>	<b>\$ (9,444)</b>	<b>\$ (9,264)</b>
<b>Cash Flow after End of Life Costs</b>	<b>\$ (11,689)</b>	<b>\$ (11,069)</b>	<b>\$ (10,133)</b>	<b>\$ (9,461)</b>	<b>\$ (9,315)</b>	<b>\$ (8,708)</b>	<b>\$ (8,199)</b>	<b>\$ (7,764)</b>	<b>\$ (7,268)</b>	<b>\$ (6,612)</b>
Internal Rate of Return with EOL Costs		Neg. IRR	Neg. IRR	Neg. IRR	Neg. IRR	Neg. IRR	Neg. IRR	Neg. IRR	Neg. IRR	Neg. IRR

## Exhibit 1

### Calculation of Amortization of Capital Investment: Strip Price Case

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
<i>(\$ in thousands)</i>										
<b>Total Culver City Investment</b>										
Acquisition Price	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
(-) Maintenance Capital	(68)	(64)	(61)	(60)	(59)	(59)	(59)	(70)	(66)	(68)
(-) Recompletion Capital	-	-	-	-	-	(160)	(160)	-	-	-
(-) Abandonment Capital	-	-	-	(720)	-	-	(360)	(1,440)	(1,440)	(720)
(-) EOL Remediation and Facilities	-	-	-	-	-	-	-	-	-	-
<b>Invested Dollars</b>	<b>(68)</b>	<b>(64)</b>	<b>(61)</b>	<b>(780)</b>	<b>(59)</b>	<b>(219)</b>	<b>(579)</b>	<b>(1,510)</b>	<b>(1,506)</b>	<b>(788)</b>
<b>Cumulative Invested Dollars</b>	<b>(3,458)</b>	<b>(3,522)</b>	<b>(3,584)</b>	<b>(4,363)</b>	<b>(4,422)</b>	<b>(4,642)</b>	<b>(5,221)</b>	<b>(6,730)</b>	<b>(8,237)</b>	<b>(9,025)</b>
<b>Culver City Operating Cash Flow</b>										
Net Revenue	3,185	2,916	2,701	2,489	2,314	2,091	1,869	1,926	1,537	1,321
(-) LOE	(1,766)	(1,833)	(1,654)	(1,570)	(1,518)	(1,428)	(1,164)	(1,080)	(843)	(731)
(-) Ad Val Tax	(168)	(152)	(140)	(128)	(119)	(107)	(95)	(97)	(78)	(67)
(-) Severance Tax	(41)	(38)	(35)	(32)	(29)	(26)	(24)	(24)	(19)	(17)
(-) G&A Allocation	(386)	(353)	(327)	(302)	(280)	(253)	(226)	(233)	(186)	(160)
<b>Cash Flow Before Capital</b>	<b>825</b>	<b>540</b>	<b>545</b>	<b>458</b>	<b>367</b>	<b>277</b>	<b>360</b>	<b>492</b>	<b>411</b>	<b>346</b>
(-) Income Taxes	(301)	(166)	(175)	-	(97)	-	-	-	-	-
<b>Cash Flow Available to Distribute</b>	<b>\$ 525</b>	<b>\$ 374</b>	<b>\$ 369</b>	<b>\$ 458</b>	<b>\$ 270</b>	<b>\$ 277</b>	<b>\$ 360</b>	<b>\$ 492</b>	<b>\$ 411</b>	<b>\$ 346</b>
<b>Cumulative CFATD</b>	<b>\$ 6,566</b>	<b>\$ 6,940</b>	<b>\$ 7,310</b>	<b>\$ 7,768</b>	<b>\$ 8,038</b>	<b>\$ 8,315</b>	<b>\$ 8,675</b>	<b>\$ 9,167</b>	<b>\$ 9,578</b>	<b>\$ 9,924</b>
<b>Cash Flow After Acquisition and Capex</b>	<b>\$ 456</b>	<b>\$ 310</b>	<b>\$ 308</b>	<b>\$ (322)</b>	<b>\$ 211</b>	<b>\$ 57</b>	<b>\$ (219)</b>	<b>\$ (1,017)</b>	<b>\$ (1,095)</b>	<b>\$ (442)</b>
Internal Rate of Return	23%	23%	24%	23%	24%	24%	24%	23%	23%	22%
<b>Cumulative Total Cash Flow</b>	<b>\$ 3,108</b>	<b>\$ 3,418</b>	<b>\$ 3,726</b>	<b>\$ 3,404</b>	<b>\$ 3,616</b>	<b>\$ 3,673</b>	<b>\$ 3,454</b>	<b>\$ 2,437</b>	<b>\$ 1,341</b>	<b>\$ 899</b>
Remaining Abandonment Cost	(7,740)	(7,740)	(7,740)	(7,020)	(7,020)	(7,020)	(6,660)	(5,220)	(3,780)	(3,060)
EOL Surface Remediation Costs	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)
Capital to Remove Facilities	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)
<b>Total End of Life Cost</b>	<b>\$ (9,264)</b>	<b>\$ (9,264)</b>	<b>\$ (9,264)</b>	<b>\$ (8,544)</b>	<b>\$ (8,544)</b>	<b>\$ (8,544)</b>	<b>\$ (8,184)</b>	<b>\$ (6,744)</b>	<b>\$ (5,304)</b>	<b>\$ (4,584)</b>
<b>Cash Flow after End of Life Costs</b>	<b>\$ (6,156)</b>	<b>\$ (5,846)</b>	<b>\$ (5,538)</b>	<b>\$ (5,140)</b>	<b>\$ (4,928)</b>	<b>\$ (4,871)</b>	<b>\$ (4,730)</b>	<b>\$ (4,307)</b>	<b>\$ (3,963)</b>	<b>\$ (3,685)</b>
Internal Rate of Return with EOL Costs	Neg. IRR	Neg. IRR	Neg. IRR	Neg. IRR	Neg. IRR	Neg. IRR	Neg. IRR	Neg. IRR	10%	9%

## Exhibit 1

### Calculation of Amortization of Capital Investment: Strip Price Case

	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
<i>(\$ in thousands)</i>										
<b>Total Culver City Investment</b>										
Acquisition Price	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
(-) Maintenance Capital	(72)	(15)	(15)	(12)	(13)	(12)	(9)	(6)	(7)	(7)
(-) Recompletion Capital	-	-	-	-	-	-	-	-	-	-
(-) Abandonment Capital	(360)	-	(360)	(720)	(360)	-	(360)	(360)	-	-
(-) EOL Remediation and Facilities	-	-	-	-	-	-	-	-	-	-
<b>Invested Dollars</b>	<b>(432)</b>	<b>(15)</b>	<b>(375)</b>	<b>(732)</b>	<b>(373)</b>	<b>(12)</b>	<b>(369)</b>	<b>(366)</b>	<b>(7)</b>	<b>(7)</b>
<b>Cumulative Invested Dollars</b>	<b>(9,457)</b>	<b>(9,472)</b>	<b>(9,846)</b>	<b>(10,578)</b>	<b>(10,952)</b>	<b>(10,964)</b>	<b>(11,333)</b>	<b>(11,699)</b>	<b>(11,706)</b>	<b>(11,713)</b>
<b>Culver City Operating Cash Flow</b>										
Net Revenue	1,163	1,078	924	650	599	451	290	164	157	150
(-) LOE	(640)	(618)	(520)	(300)	(284)	(228)	(163)	(111)	(108)	(106)
(-) Ad Val Tax	(59)	(54)	(46)	(33)	(30)	(23)	(15)	(9)	(8)	(8)
(-) Severance Tax	(15)	(13)	(11)	(8)	(7)	(6)	(4)	(2)	(2)	(2)
(-) G&A Allocation	(141)	(131)	(112)	(79)	(73)	(55)	(35)	(20)	(19)	(18)
<b>Cash Flow Before Capital</b>	<b>309</b>	<b>262</b>	<b>234</b>	<b>230</b>	<b>205</b>	<b>140</b>	<b>72</b>	<b>22</b>	<b>19</b>	<b>16</b>
(-) Income Taxes	-	(97)	-	-	-	(53)	-	-	(2)	(1)
<b>Cash Flow Available to Distribute</b>	<b>\$ 309</b>	<b>\$ 165</b>	<b>\$ 234</b>	<b>\$ 230</b>	<b>\$ 205</b>	<b>\$ 87</b>	<b>\$ 72</b>	<b>\$ 22</b>	<b>\$ 17</b>	<b>\$ 15</b>
<b>Cumulative CFATD</b>	<b>\$ 10,233</b>	<b>\$ 10,398</b>	<b>\$ 10,632</b>	<b>\$ 10,862</b>	<b>\$ 11,067</b>	<b>\$ 11,154</b>	<b>\$ 11,226</b>	<b>\$ 11,249</b>	<b>\$ 11,266</b>	<b>\$ 11,281</b>
<b>Cash Flow After Acquisition and Capex</b>	<b>\$ (123)</b>	<b>\$ 150</b>	<b>\$ (141)</b>	<b>\$ (502)</b>	<b>\$ (168)</b>	<b>\$ 75</b>	<b>\$ (297)</b>	<b>\$ (344)</b>	<b>\$ 10</b>	<b>\$ 8</b>
Internal Rate of Return	22%	22%	22%	22%	22%	22%	22%	22%	22%	22%
<b>Cumulative Total Cash Flow</b>	<b>\$ 776</b>	<b>\$ 926</b>	<b>\$ 785</b>	<b>\$ 284</b>	<b>\$ 115</b>	<b>\$ 190</b>	<b>\$ (107)</b>	<b>\$ (451)</b>	<b>\$ (440)</b>	<b>\$ (432)</b>
Remaining Abandonment Cost	(2,700)	(2,700)	(2,340)	(1,620)	(1,260)	(1,260)	(900)	(540)	(540)	(540)
EOL Surface Remediation Costs	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)
Capital to Remove Facilities	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)
<b>Total End of Life Cost</b>	<b>\$ (4,224)</b>	<b>\$ (4,224)</b>	<b>\$ (3,864)</b>	<b>\$ (3,144)</b>	<b>\$ (2,784)</b>	<b>\$ (2,784)</b>	<b>\$ (2,424)</b>	<b>\$ (2,064)</b>	<b>\$ (2,064)</b>	<b>\$ (2,064)</b>
<b>Cash Flow after End of Life Costs</b>	<b>\$ (3,448)</b>	<b>\$ (3,298)</b>	<b>\$ (3,079)</b>	<b>\$ (2,860)</b>	<b>\$ (2,669)</b>	<b>\$ (2,594)</b>	<b>\$ (2,531)</b>	<b>\$ (2,515)</b>	<b>\$ (2,504)</b>	<b>\$ (2,496)</b>
Internal Rate of Return with EOL Costs	8%	7%	6%	5%	5%	5%	4%	4%	4%	1%



## Exhibit 1

### Calculation of Amortization of Capital Investment: Strip Price Case

	2046	2047	2048	2049	2050	2051	2052	2053	2054	2055	2056
<i>(\$ in thousands)</i>											
<b>Total Culver City Investment</b>											
Acquisition Price	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
(-) Maintenance Capital	(8)	(8)	(9)	(9)	(10)	-	-	-	-	-	-
(-) Recompletion Capital	-	-	-	-	-	-	-	-	-	-	-
(-) Abandonment Capital	-	-	-	-	-	-	-	(360)	-	-	(180)
(-) EOL Remediation and Facilities	-	-	-	-	-	-	-	-	-	-	(1,524)
<b>Invested Dollars</b>	<b>(8)</b>	<b>(8)</b>	<b>(9)</b>	<b>(9)</b>	<b>(10)</b>	<b>-</b>	<b>-</b>	<b>(360)</b>	<b>-</b>	<b>-</b>	<b>(1,704)</b>
<b>Cumulative Invested Dollars</b>	<b>(11,721)</b>	<b>(11,729)</b>	<b>(11,738)</b>	<b>(11,748)</b>	<b>(11,757)</b>	<b>(11,757)</b>	<b>(11,757)</b>	<b>(12,117)</b>	<b>(12,117)</b>	<b>(12,117)</b>	<b>(13,821)</b>
<b>Culver City Operating Cash Flow</b>											
Net Revenue	144	139	133	128	123	118	99	21	20	18	9
(-) LOE	(104)	(104)	(102)	(100)	(98)	(97)	(81)	(9)	(9)	(8)	(4)
(-) Ad Val Tax	(8)	(7)	(7)	(6)	(6)	(6)	(5)	(1)	(1)	(1)	(0)
(-) Severance Tax	(2)	(2)	(2)	(2)	(1)	(1)	(1)	(0)	(0)	(0)	(0)
(-) G&A Allocation	(17)	(17)	(16)	(16)	(15)	(14)	(12)	(3)	(2)	(2)	(1)
<b>Cash Flow Before Capital</b>	<b>13</b>	<b>9</b>	<b>7</b>	<b>5</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>8</b>	<b>7</b>	<b>7</b>	<b>3</b>
(-) Income Taxes	-	-	-	-	-	-	-	-	(3)	(3)	-
<b>Cash Flow Available to Distribute</b>	<b>\$ 13</b>	<b>\$ 9</b>	<b>\$ 7</b>	<b>\$ 5</b>	<b>\$ 2</b>	<b>\$ 0</b>	<b>\$ 0</b>	<b>\$ 8</b>	<b>\$ 4</b>	<b>\$ 4</b>	<b>\$ 3</b>
<b>Cumulative CFATD</b>	<b>\$ 11,294</b>	<b>\$ 11,304</b>	<b>\$ 11,311</b>	<b>\$ 11,315</b>	<b>\$ 11,318</b>	<b>\$ 11,318</b>	<b>\$ 11,318</b>	<b>\$ 11,326</b>	<b>\$ 11,330</b>	<b>\$ 11,334</b>	<b>\$ 11,337</b>
<b>Cash Flow After Acquisition and Capex</b>	<b>\$ 6</b>	<b>\$ 1</b>	<b>\$ (2)</b>	<b>\$ (5)</b>	<b>\$ (7)</b>	<b>\$ 0</b>	<b>\$ 0</b>	<b>\$ (352)</b>	<b>\$ 4</b>	<b>\$ 4</b>	<b>\$ (1,701)</b>
Internal Rate of Return	22%	22%	22%	22%	22%	22%	22%	22%	22%	22%	22%
<b>Cumulative Total Cash Flow</b>	<b>\$ (427)</b>	<b>\$ (426)</b>	<b>\$ (428)</b>	<b>\$ (432)</b>	<b>\$ (440)</b>	<b>\$ (439)</b>	<b>\$ (439)</b>	<b>\$ (791)</b>	<b>\$ (787)</b>	<b>\$ (783)</b>	<b>\$ (2,484)</b>
Remaining Abandonment Cost	(540)	(540)	(540)	(540)	(540)	(540)	(540)	(180)	(180)	(180)	-
EOL Surface Remediation Costs	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	-
Capital to Remove Facilities	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)	-
<b>Total End of Life Cost</b>	<b>\$ (2,064)</b>	<b>\$ (2,064)</b>	<b>\$ (2,064)</b>	<b>\$ (2,064)</b>	<b>\$ (2,064)</b>	<b>\$ (2,064)</b>	<b>\$ (2,064)</b>	<b>\$ (1,704)</b>	<b>\$ (1,704)</b>	<b>\$ (1,704)</b>	<b>\$ -</b>
<b>Cash Flow after End of Life Costs</b>	<b>\$ (2,491)</b>	<b>\$ (2,490)</b>	<b>\$ (2,492)</b>	<b>\$ (2,496)</b>	<b>\$ (2,504)</b>	<b>\$ (2,503)</b>	<b>\$ (2,503)</b>	<b>\$ (2,495)</b>	<b>\$ (2,491)</b>	<b>\$ (2,487)</b>	<b>\$ (2,484)</b>
Internal Rate of Return with EOL Costs	4%	4%	4%	4%	4%	4%	4%	4%	3%	3%	3%

## Exhibit 2

### Calculation of Amortization of Capital Investment: \$75 Price Case

	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
<i>(\$ in thousands)</i>										
<b>Total Culver City Investment</b>										
Acquisition Price	\$ (2,245)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
(-) Maintenance Capital	-	(34)	(145)	(195)	(67)	(122)	(70)	(69)	(72)	(75)
(-) Recompletion Capital	-	-	-	-	-	-	-	-	(119)	-
(-) Abandonment Capital	-	-	-	-	-	-	-	-	-	-
(-) EOL Remediation and Facilities	-	-	-	-	-	-	-	-	-	-
<b>Invested Dollars</b>	<b>(2,245)</b>	<b>(34)</b>	<b>(145)</b>	<b>(195)</b>	<b>(67)</b>	<b>(122)</b>	<b>(70)</b>	<b>(69)</b>	<b>(191)</b>	<b>(75)</b>
<b>Cumulative Invested Dollars</b>	<b>(2,245)</b>	<b>(2,279)</b>	<b>(2,424)</b>	<b>(2,619)</b>	<b>(2,685)</b>	<b>(2,807)</b>	<b>(2,877)</b>	<b>(2,947)</b>	<b>(3,137)</b>	<b>(3,212)</b>
<b>Culver City Operating Cash Flow</b>										
Net Revenue	-	3,167	3,880	3,845	2,067	3,610	4,008	3,991	4,213	4,412
(-) LOE	-	(1,681)	(1,618)	(2,003)	(1,434)	(1,701)	(2,065)	(2,050)	(1,868)	(1,926)
(-) Ad Val Tax	-	(56)	(56)	(142)	(86)	(178)	(227)	(225)	(233)	(240)
(-) Severance Tax	-	(31)	(34)	(38)	(42)	(42)	(44)	(43)	(45)	(46)
(-) G&A Allocation	-	(278)	(340)	(310)	(250)	(437)	(486)	(484)	(510)	(534)
<b>Cash Flow Before Capital</b>	<b>-</b>	<b>1,122</b>	<b>1,832</b>	<b>1,352</b>	<b>255</b>	<b>1,250</b>	<b>1,187</b>	<b>1,189</b>	<b>1,556</b>	<b>1,666</b>
(-) Income Taxes	-	(467)	(751)	(485)	(43)	(477)	(461)	(463)	(581)	(689)
<b>Cash Flow Available to Distribute</b>	<b>\$ -</b>	<b>\$ 654</b>	<b>\$ 1,081</b>	<b>\$ 867</b>	<b>\$ 212</b>	<b>\$ 774</b>	<b>\$ 726</b>	<b>\$ 726</b>	<b>\$ 975</b>	<b>\$ 976</b>
<b>Cumulative CFATD</b>	<b>\$ -</b>	<b>\$ 654</b>	<b>\$ 1,735</b>	<b>\$ 2,602</b>	<b>\$ 2,814</b>	<b>\$ 3,588</b>	<b>\$ 4,314</b>	<b>\$ 5,040</b>	<b>\$ 6,015</b>	<b>\$ 6,991</b>
<b>Cash Flow After Acquisition and Capex</b>	<b>\$ (2,245)</b>	<b>\$ 620</b>	<b>\$ 936</b>	<b>\$ 672</b>	<b>\$ 146</b>	<b>\$ 651</b>	<b>\$ 656</b>	<b>\$ 657</b>	<b>\$ 785</b>	<b>\$ 902</b>
Internal Rate of Return		-72%	-20%	0%	3%	12%	17%	21%	23%	25%
<b>Cumulative Total Cash Flow</b>	<b>\$ (2,245)</b>	<b>\$ (1,625)</b>	<b>\$ (689)</b>	<b>\$ (17)</b>	<b>\$ 129</b>	<b>\$ 780</b>	<b>\$ 1,436</b>	<b>\$ 2,093</b>	<b>\$ 2,877</b>	<b>\$ 3,779</b>
Remaining Abandonment Cost	(7,920)	(7,920)	(7,920)	(7,920)	(7,920)	(7,920)	(7,920)	(7,920)	(7,920)	(7,920)
EOL Surface Remediation Costs	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)
Capital to Remove Facilities	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)
<b>Total End of Life Cost</b>	<b>\$ (9,444)</b>	<b>\$ (9,444)</b>	<b>\$ (9,444)</b>	<b>\$ (9,444)</b>	<b>\$ (9,444)</b>	<b>\$ (9,444)</b>	<b>\$ (9,444)</b>	<b>\$ (9,444)</b>	<b>\$ (9,444)</b>	<b>\$ (9,444)</b>
<b>Cash Flow after End of Life Costs</b>	<b>\$ (11,689)</b>	<b>\$ (11,069)</b>	<b>\$ (10,133)</b>	<b>\$ (9,461)</b>	<b>\$ (9,315)</b>	<b>\$ (8,664)</b>	<b>\$ (8,008)</b>	<b>\$ (7,351)</b>	<b>\$ (6,567)</b>	<b>\$ (5,665)</b>
Internal Rate of Return with EOL Costs		Neg. IRR	Neg. IRR	Neg. IRR	Neg. IRR	Neg. IRR	Neg. IRR	Neg. IRR	Neg. IRR	Neg. IRR

## Exhibit 2

### Calculation of Amortization of Capital Investment: \$75 Price Case

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
<i>(\$ in thousands)</i>										
<b>Total Culver City Investment</b>										
Acquisition Price	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
(-) Maintenance Capital	(70)	(65)	(62)	(63)	(63)	(63)	(73)	(89)	(92)	(96)
(-) Recompletion Capital	-	-	-	-	-	(160)	(160)	-	-	-
(-) Abandonment Capital	-	-	-	(360)	-	-	-	(720)	(720)	(1,080)
(-) EOL Remediation and Facilities	-	-	-	-	-	-	-	-	-	-
<b>Invested Dollars</b>	<b>(70)</b>	<b>(65)</b>	<b>(62)</b>	<b>(423)</b>	<b>(63)</b>	<b>(223)</b>	<b>(233)</b>	<b>(809)</b>	<b>(812)</b>	<b>(1,176)</b>
<b>Cumulative Invested Dollars</b>	<b>(3,282)</b>	<b>(3,347)</b>	<b>(3,409)</b>	<b>(3,833)</b>	<b>(3,895)</b>	<b>(4,119)</b>	<b>(4,351)</b>	<b>(5,160)</b>	<b>(5,973)</b>	<b>(7,149)</b>
<b>Culver City Operating Cash Flow</b>										
Net Revenue	4,013	3,687	3,394	3,276	3,044	2,753	2,860	3,099	2,704	2,349
(-) LOE	(1,841)	(1,908)	(1,700)	(1,730)	(1,676)	(1,584)	(1,619)	(1,677)	(1,526)	(1,354)
(-) Ad Val Tax	(218)	(199)	(183)	(175)	(162)	(146)	(150)	(160)	(140)	(121)
(-) Severance Tax	(42)	(38)	(35)	(34)	(31)	(28)	(29)	(31)	(27)	(23)
(-) G&A Allocation	(486)	(447)	(411)	(397)	(369)	(334)	(346)	(375)	(328)	(285)
<b>Cash Flow Before Capital</b>	<b>1,426</b>	<b>1,094</b>	<b>1,065</b>	<b>941</b>	<b>806</b>	<b>662</b>	<b>716</b>	<b>855</b>	<b>684</b>	<b>565</b>
(-) Income Taxes	(581)	(425)	(419)	(178)	(297)	(151)	(171)	-	-	-
<b>Cash Flow Available to Distribute</b>	<b>\$ 845</b>	<b>\$ 669</b>	<b>\$ 646</b>	<b>\$ 763</b>	<b>\$ 509</b>	<b>\$ 510</b>	<b>\$ 545</b>	<b>\$ 855</b>	<b>\$ 684</b>	<b>\$ 565</b>
<b>Cumulative CFATD</b>	<b>\$ 7,836</b>	<b>\$ 8,505</b>	<b>\$ 9,151</b>	<b>\$ 9,914</b>	<b>\$ 10,423</b>	<b>\$ 10,933</b>	<b>\$ 11,478</b>	<b>\$ 12,333</b>	<b>\$ 13,017</b>	<b>\$ 13,582</b>
<b>Cash Flow After Acquisition and Capex</b>	<b>\$ 775</b>	<b>\$ 604</b>	<b>\$ 584</b>	<b>\$ 339</b>	<b>\$ 446</b>	<b>\$ 287</b>	<b>\$ 312</b>	<b>\$ 46</b>	<b>\$ (128)</b>	<b>\$ (611)</b>
Internal Rate of Return	27%	27%	28%	28%	28%	28%	28%	28%	28%	28%
<b>Cumulative Total Cash Flow</b>	<b>\$ 4,554</b>	<b>\$ 5,158</b>	<b>\$ 5,742</b>	<b>\$ 6,082</b>	<b>\$ 6,527</b>	<b>\$ 6,814</b>	<b>\$ 7,126</b>	<b>\$ 7,172</b>	<b>\$ 7,044</b>	<b>\$ 6,433</b>
Remaining Abandonment Cost	(7,920)	(7,920)	(7,920)	(7,560)	(7,560)	(7,560)	(7,560)	(6,840)	(6,120)	(5,040)
EOL Surface Remediation Costs	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)
Capital to Remove Facilities	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)
<b>Total End of Life Cost</b>	<b>\$ (9,444)</b>	<b>\$ (9,444)</b>	<b>\$ (9,444)</b>	<b>\$ (9,084)</b>	<b>\$ (9,084)</b>	<b>\$ (9,084)</b>	<b>\$ (9,084)</b>	<b>\$ (8,364)</b>	<b>\$ (7,644)</b>	<b>\$ (6,564)</b>
<b>Cash Flow after End of Life Costs</b>	<b>\$ (4,890)</b>	<b>\$ (4,286)</b>	<b>\$ (3,702)</b>	<b>\$ (3,002)</b>	<b>\$ (2,557)</b>	<b>\$ (2,270)</b>	<b>\$ (1,958)</b>	<b>\$ (1,192)</b>	<b>\$ (600)</b>	<b>\$ (131)</b>
Internal Rate of Return with EOL Costs	Neg. IRR	Neg. IRR	Neg. IRR	Neg. IRR	9%	6%	4%	2%	1%	0%

## Exhibit 2

### Calculation of Amortization of Capital Investment: \$75 Price Case

	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
<i>(\$ in thousands)</i>										
<b>Total Culver City Investment</b>										
Acquisition Price	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
(-) Maintenance Capital	(99)	(20)	(21)	(21)	(22)	(20)	(19)	(17)	(15)	(13)
(-) Recompletion Capital	-	-	-	-	-	-	-	-	-	-
(-) Abandonment Capital	(360)	(360)	(360)	(360)	(1,080)	(360)	(360)	(360)	-	(720)
(-) EOL Remediation and Facilities	-	-	-	-	-	-	-	-	-	-
<b>Invested Dollars</b>	<b>(459)</b>	<b>(380)</b>	<b>(381)</b>	<b>(381)</b>	<b>(1,102)</b>	<b>(380)</b>	<b>(379)</b>	<b>(377)</b>	<b>(15)</b>	<b>(733)</b>
<b>Cumulative Invested Dollars</b>	<b>(7,609)</b>	<b>(7,988)</b>	<b>(8,369)</b>	<b>(8,750)</b>	<b>(9,852)</b>	<b>(10,232)</b>	<b>(10,611)</b>	<b>(10,988)</b>	<b>(11,003)</b>	<b>(11,736)</b>
<b>Culver City Operating Cash Flow</b>										
Net Revenue	2,017	1,805	1,640	1,382	1,181	895	678	507	412	312
(-) LOE	(1,142)	(1,040)	(962)	(784)	(650)	(511)	(446)	(390)	(313)	(227)
(-) Ad Val Tax	(104)	(93)	(84)	(71)	(61)	(46)	(35)	(27)	(22)	(17)
(-) Severance Tax	(20)	(18)	(16)	(14)	(12)	(9)	(7)	(5)	(4)	(3)
(-) G&A Allocation	(244)	(219)	(199)	(167)	(143)	(108)	(82)	(61)	(50)	(38)
<b>Cash Flow Before Capital</b>	<b>506</b>	<b>435</b>	<b>379</b>	<b>346</b>	<b>315</b>	<b>219</b>	<b>108</b>	<b>23</b>	<b>23</b>	<b>27</b>
(-) Income Taxes	-	-	-	-	-	-	-	-	-	-
<b>Cash Flow Available to Distribute</b>	<b>\$ 506</b>	<b>\$ 435</b>	<b>\$ 379</b>	<b>\$ 346</b>	<b>\$ 315</b>	<b>\$ 219</b>	<b>\$ 108</b>	<b>\$ 23</b>	<b>\$ 23</b>	<b>\$ 27</b>
<b>Cumulative CFATD</b>	<b>\$ 14,088</b>	<b>\$ 14,523</b>	<b>\$ 14,902</b>	<b>\$ 15,248</b>	<b>\$ 15,564</b>	<b>\$ 15,783</b>	<b>\$ 15,891</b>	<b>\$ 15,914</b>	<b>\$ 15,936</b>	<b>\$ 15,964</b>
<b>Cash Flow After Acquisition and Capex</b>	<b>\$ 47</b>	<b>\$ 55</b>	<b>\$ (2)</b>	<b>\$ (35)</b>	<b>\$ (786)</b>	<b>\$ (161)</b>	<b>\$ (271)</b>	<b>\$ (354)</b>	<b>\$ 7</b>	<b>\$ (706)</b>
Internal Rate of Return	28%	28%	28%	28%	28%	28%	28%	28%	28%	28%
<b>Cumulative Total Cash Flow</b>	<b>\$ 6,480</b>	<b>\$ 6,535</b>	<b>\$ 6,533</b>	<b>\$ 6,498</b>	<b>\$ 5,712</b>	<b>\$ 5,551</b>	<b>\$ 5,280</b>	<b>\$ 4,926</b>	<b>\$ 4,933</b>	<b>\$ 4,227</b>
Remaining Abandonment Cost	(4,680)	(4,320)	(3,960)	(3,600)	(2,520)	(2,160)	(1,800)	(1,440)	(1,440)	(720)
EOL Surface Remediation Costs	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)
Capital to Remove Facilities	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)
<b>Total End of Life Cost</b>	<b>\$ (6,204)</b>	<b>\$ (5,844)</b>	<b>\$ (5,484)</b>	<b>\$ (5,124)</b>	<b>\$ (4,044)</b>	<b>\$ (3,684)</b>	<b>\$ (3,324)</b>	<b>\$ (2,964)</b>	<b>\$ (2,964)</b>	<b>\$ (2,244)</b>
<b>Cash Flow after End of Life Costs</b>	<b>\$ 276</b>	<b>\$ 691</b>	<b>\$ 1,049</b>	<b>\$ 1,374</b>	<b>\$ 1,668</b>	<b>\$ 1,867</b>	<b>\$ 1,956</b>	<b>\$ 1,962</b>	<b>\$ 1,969</b>	<b>\$ 1,983</b>
Internal Rate of Return with EOL Costs	28%	28%	28%	28%	28%	28%	28%	28%	28%	28%

## Exhibit 2

### Calculation of Amortization of Capital Investment: \$75 Price Case

	2046	2047	2048	2049	2050	2051	2052	2053	2054	2055
<i>(\$ in thousands)</i>										
<b>Total Culver City Investment</b>										
Acquisition Price	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
(-) Maintenance Capital	(15)	(10)	(9)	(9)	(10)	-	-	-	-	-
(-) Recompletion Capital	-	-	-	-	-	-	-	-	-	-
(-) Abandonment Capital	-	-	(360)	-	-	-	-	-	-	-
(-) EOL Remediation and Facilities	-	-	-	-	-	-	-	-	-	-
<b>Invested Dollars</b>	<b>(15)</b>	<b>(10)</b>	<b>(369)</b>	<b>(9)</b>	<b>(10)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Cumulative Invested Dollars</b>	<b>(11,751)</b>	<b>(11,761)</b>	<b>(12,130)</b>	<b>(12,140)</b>	<b>(12,149)</b>	<b>(12,149)</b>	<b>(12,149)</b>	<b>(12,149)</b>	<b>(12,149)</b>	<b>(12,149)</b>
<b>Culver City Operating Cash Flow</b>										
Net Revenue	302	198	158	151	145	139	133	128	123	118
(-) LOE	(225)	(135)	(102)	(100)	(98)	(97)	(95)	(93)	(92)	(90)
(-) Ad Val Tax	(16)	(11)	(9)	(8)	(8)	(7)	(7)	(7)	(6)	(6)
(-) Severance Tax	(3)	(2)	(2)	(2)	(1)	(1)	(1)	(1)	(1)	(1)
(-) G&A Allocation	(37)	(24)	(19)	(18)	(18)	(17)	(16)	(16)	(15)	(14)
<b>Cash Flow Before Capital</b>	<b>22</b>	<b>26</b>	<b>27</b>	<b>23</b>	<b>20</b>	<b>17</b>	<b>14</b>	<b>11</b>	<b>9</b>	<b>6</b>
(-) Income Taxes	-	(3)	-	(3)	(1)	(5)	(4)	(2)	(1)	(0)
<b>Cash Flow Available to Distribute</b>	<b>\$ 22</b>	<b>\$ 23</b>	<b>\$ 27</b>	<b>\$ 20</b>	<b>\$ 18</b>	<b>\$ 12</b>	<b>\$ 10</b>	<b>\$ 9</b>	<b>\$ 7</b>	<b>\$ 6</b>
<b>Cumulative CFATD</b>	<b>\$ 15,985</b>	<b>\$ 16,008</b>	<b>\$ 16,035</b>	<b>\$ 16,055</b>	<b>\$ 16,073</b>	<b>\$ 16,085</b>	<b>\$ 16,095</b>	<b>\$ 16,104</b>	<b>\$ 16,112</b>	<b>\$ 16,118</b>
<b>Cash Flow After Acquisition and Capex</b>	<b>\$ 7</b>	<b>\$ 13</b>	<b>\$ (342)</b>	<b>\$ 11</b>	<b>\$ 9</b>	<b>\$ 12</b>	<b>\$ 10</b>	<b>\$ 9</b>	<b>\$ 7</b>	<b>\$ 6</b>
Internal Rate of Return	28%	28%	28%	28%	28%	28%	28%	28%	28%	28%
<b>Cumulative Total Cash Flow</b>	<b>\$ 4,234</b>	<b>\$ 4,247</b>	<b>\$ 3,905</b>	<b>\$ 3,915</b>	<b>\$ 3,924</b>	<b>\$ 3,936</b>	<b>\$ 3,946</b>	<b>\$ 3,955</b>	<b>\$ 3,963</b>	<b>\$ 3,969</b>
Remaining Abandonment Cost	(720)	(720)	(360)	(360)	(360)	(360)	(360)	(360)	(360)	(360)
EOL Surface Remediation Costs	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)	(1,300)
Capital to Remove Facilities	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)	(224)
<b>Total End of Life Cost</b>	<b>\$ (2,244)</b>	<b>\$ (2,244)</b>	<b>\$ (1,884)</b>	<b>\$ (1,884)</b>	<b>\$ (1,884)</b>	<b>\$ (1,884)</b>	<b>\$ (1,884)</b>	<b>\$ (1,884)</b>	<b>\$ (1,884)</b>	<b>\$ (1,884)</b>
<b>Cash Flow after End of Life Costs</b>	<b>\$ 1,990</b>	<b>\$ 2,003</b>	<b>\$ 2,021</b>	<b>\$ 2,031</b>	<b>\$ 2,040</b>	<b>\$ 2,052</b>	<b>\$ 2,062</b>	<b>\$ 2,071</b>	<b>\$ 2,079</b>	<b>\$ 2,085</b>
Internal Rate of Return with EOL Costs	28%	28%	28%	28%	28%	28%	28%	28%	28%	28%

## Exhibit 2

### Calculation of Amortization of Capital Investment: \$75 Price Case

	2056	2057	2058	2059
<i>(\$ in thousands)</i>				
<b>Total Culver City Investment</b>				
Acquisition Price	\$ -	\$ -	\$ -	\$ -
(-) Maintenance Capital	-	-	-	-
(-) Recompletion Capital	-	-	-	-
(-) Abandonment Capital	-	-	-	(360)
(-) EOL Remediation and Facilities	-	-	-	(1,524)
<b>Invested Dollars</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>(1,884)</b>
<b>Cumulative Invested Dollars</b>	<b>(12,149)</b>	<b>(12,149)</b>	<b>(12,149)</b>	<b>(14,033)</b>
<b>Culver City Operating Cash Flow</b>				
Net Revenue	103	90	87	71
(-) LOE	(85)	(81)	(80)	(66)
(-) Ad Val Tax	(5)	(5)	(4)	(3)
(-) Severance Tax	(1)	(1)	(1)	(1)
(-) G&A Allocation	(13)	(11)	(11)	(9)
<b>Cash Flow Before Capital</b>	<b>(1)</b>	<b>(7)</b>	<b>(9)</b>	<b>(8)</b>
(-) Income Taxes	-	-	-	-
<b>Cash Flow Available to Distribute</b>	<b>\$ (1)</b>	<b>\$ (7)</b>	<b>\$ (9)</b>	<b>\$ (8)</b>
<b>Cumulative CFATD</b>	<b>\$ 16,117</b>	<b>\$ 16,110</b>	<b>\$ 16,101</b>	<b>\$ 16,093</b>
<b>Cash Flow After Acquisition and Capex</b>	<b>\$ (1)</b>	<b>\$ (7)</b>	<b>\$ (9)</b>	<b>\$ (1,892)</b>
Internal Rate of Return	28%	28%	28%	28%
<b>Cumulative Total Cash Flow</b>	<b>\$ 3,968</b>	<b>\$ 3,961</b>	<b>\$ 3,952</b>	<b>\$ 2,060</b>
Remaining Abandonment Cost	(360)	(360)	(360)	-
EOL Surface Remediation Costs	(1,300)	(1,300)	(1,300)	-
Capital to Remove Facilities	(224)	(224)	(224)	-
<b>Total End of Life Cost</b>	<b>\$ (1,884)</b>	<b>\$ (1,884)</b>	<b>\$ (1,884)</b>	<b>\$ -</b>
<b>Cash Flow after End of Life Costs</b>	<b>\$ 2,084</b>	<b>\$ 2,077</b>	<b>\$ 2,068</b>	<b>\$ 2,060</b>
Internal Rate of Return with EOL Costs	28%	28%	28%	28%

### Exhibit 3 Discounted Cash Flow Analysis

(\$ in thousands)

<b>EOL Surface Remediation Costs</b>	\$ 1,950.00
<b>Capital to Remove Facilities</b>	\$ 224.00
<b>Discount Rate</b>	16.00%

Month	Culver City Net BOE	Operating Cash Flow	Maintenance Capex	Abandonment Cost	EOL Surface Remediation Costs	Capital to Remove Facilities	Cash Flow after EOL Obligations	Number of Periods	Discount Factor	Discounted Cash Flow
Jun-21	5.24	133.85	9.24	-	-	-	124.61	1	0.9868	122.97
Jul-21	5.34	138.72	9.41	-	-	-	129.31	2	0.9739	125.93
Aug-21	5.52	147.50	9.73	-	-	-	137.77	3	0.9610	132.40
Sep-21	5.64	153.34	9.94	-	-	-	143.40	4	0.9484	136.00
Oct-21	5.62	152.44	9.91	-	-	-	142.53	5	0.9359	133.40
Nov-21	5.60	151.57	9.88	-	-	-	141.69	6	0.9236	130.86
Dec-21	5.58	150.71	9.84	-	-	-	140.86	7	0.9115	128.39
Jan-22	5.48	134.83	5.83	-	-	-	129.00	8	0.8995	116.03
Feb-22	5.46	134.08	5.82	-	-	-	128.27	9	0.8876	113.85
Mar-22	5.45	133.36	5.80	-	-	-	127.56	10	0.8759	111.73
Apr-22	5.43	132.66	5.79	-	-	-	126.87	11	0.8644	109.67
May-22	5.42	131.99	5.77	-	-	-	126.22	12	0.8530	107.67
Jun-22	5.41	131.34	5.76	-	-	-	125.59	13	0.8418	105.72
Jul-22	5.42	11.91	5.78	-	-	-	6.13	14	0.8307	5.10
Aug-22	5.42	131.44	5.77	-	-	-	125.67	15	0.8198	103.03
Sep-22	5.41	131.01	5.76	-	-	-	125.25	16	0.8090	101.33
Oct-22	5.44	11.89	5.79	-	-	-	6.10	17	0.7984	4.87
Nov-22	5.44	131.69	5.79	-	-	-	125.89	18	0.7879	99.19
Dec-22	5.44	131.55	5.80	-	-	-	125.75	19	0.7775	97.77
Jan-23	5.45	118.60	5.80	-	-	-	112.80	20	0.7673	86.55
Feb-23	5.50	(119.56)	5.85	-	-	-	(125.41)	21	0.7572	(94.96)
Mar-23	5.48	119.99	5.83	-	-	-	114.16	22	0.7472	85.30
Apr-23	5.46	119.59	5.81	-	-	-	113.78	23	0.7374	83.90
May-23	5.45	119.26	5.80	-	-	-	113.47	24	0.7277	82.57

### Exhibit 3 Discounted Cash Flow Analysis

(\$ in thousands)

<b>EOL Surface Remediation Costs</b>	\$ 1,950.00
<b>Capital to Remove Facilities</b>	\$ 224.00
<b>Discount Rate</b>	16.00%

Month	Culver City Net BOE	Operating Cash Flow	Maintenance Capex	Abandonment Cost	EOL Surface Remediation Costs	Capital to Remove Facilities	Cash Flow after EOL Obligations	Number of Periods	Discount Factor	Discounted Cash Flow
Jun-23	5.43	119.00	5.78	-	-	-	113.22	25	0.7181	81.30
Jul-23	5.42	118.81	5.77	-	-	-	113.04	26	0.7087	80.10
Aug-23	5.41	118.69	5.76	-	-	-	112.93	27	0.6993	78.98
Sep-23	5.41	118.66	5.75	-	-	-	112.91	28	0.6901	77.92
Oct-23	5.40	118.73	5.75	-	-	-	112.98	29	0.6811	76.94
Nov-23	5.40	118.89	5.75	-	-	-	113.14	30	0.6721	76.04
Dec-23	5.40	119.15	5.75	-	-	-	113.40	31	0.6633	75.22
Jan-24	5.41	110.78	5.75	-	-	-	105.04	32	0.6545	68.75
Feb-24	5.41	111.26	5.75	-	-	-	105.50	33	0.6459	68.15
Mar-24	5.43	111.86	5.77	-	-	-	106.10	34	0.6374	67.63
Apr-24	5.44	112.61	5.78	-	-	-	106.83	35	0.6290	67.20
May-24	5.46	113.50	5.80	-	-	-	107.70	36	0.6207	66.86
Jun-24	5.48	114.56	5.82	-	-	-	108.74	37	0.6126	66.61
Jul-24	5.51	(3.20)	5.85	-	-	-	(9.05)	38	0.6045	(5.47)
Aug-24	5.80	127.09	6.16	-	-	-	120.93	39	0.5966	72.14
Sep-24	5.83	128.68	6.20	-	-	-	122.48	40	0.5887	72.10
Oct-24	5.86	129.88	6.23	-	-	-	123.65	41	0.5810	71.84
Nov-24	5.88	130.66	6.25	-	-	-	124.42	42	0.5733	71.33
Dec-24	5.90	131.64	6.27	-	-	-	125.37	43	0.5658	70.93
Jan-25	5.79	125.80	6.22	180.00	-	-	(60.42)	44	0.5583	(33.74)
Feb-25	5.79	125.83	6.22	-	-	-	119.61	45	0.5510	65.90
Mar-25	5.79	126.01	6.22	-	-	-	119.79	46	0.5437	65.13
Apr-25	5.80	126.34	6.23	-	-	-	120.12	47	0.5366	64.45
May-25	5.78	125.66	6.21	-	-	-	119.45	48	0.5295	63.25



### Exhibit 3 Discounted Cash Flow Analysis

(\$ in thousands)

<b>EOL Surface Remediation Costs</b>	\$ 1,950.00
<b>Capital to Remove Facilities</b>	\$ 224.00
<b>Discount Rate</b>	16.00%

Month	Culver City Net BOE	Operating Cash Flow	Maintenance Capex	Abandonment Cost	EOL Surface Remediation Costs	Capital to Remove Facilities	Cash Flow after EOL Obligations	Number of Periods	Discount Factor	Discounted Cash Flow
Jun-25	5.73	123.86	6.15	-	-	-	117.71	49	0.5226	61.51
Jul-25	5.68	122.10	6.10	-	-	-	116.00	50	0.5157	59.82
Aug-25	5.63	120.36	6.04	-	-	-	114.32	51	0.5089	58.18
Sep-25	5.58	118.66	5.99	-	-	-	112.67	52	0.5022	56.58
Oct-25	5.53	116.98	5.94	-	-	-	111.04	53	0.4956	55.03
Nov-25	5.48	115.34	5.89	-	-	-	109.45	54	0.4891	53.53
Dec-25	5.44	113.72	5.84	-	-	-	107.89	55	0.4826	52.07
Dec-26	61.87	1,211.26	68.25	-	-	-	1,143.00	61	0.4458	509.51
Dec-27	56.71	893.38	64.06	-	-	-	829.32	73	0.3803	315.36
Dec-28	52.34	871.77	61.34	-	-	-	810.44	85	0.3244	262.89
Dec-29	47.86	759.68	59.76	720.00	-	-	(20.08)	97	0.2767	(5.56)
Dec-30	44.32	647.51	59.01	-	-	-	588.50	109	0.2360	138.91
Dec-31	39.95	370.20	59.40	-	-	-	310.79	121	0.2014	62.58
Dec-32	35.63	426.41	59.13	360.00	-	-	7.28	133	0.1718	1.25
Dec-33	36.42	725.54	69.55	1,440.00	-	-	(784.01)	145	0.1465	(114.88)
Dec-34	29.23	597.15	66.16	1,440.00	-	-	(909.01)	157	0.1250	(113.62)
Dec-35	25.16	506.14	68.21	720.00	-	-	(282.06)	169	0.1066	(30.07)
Dec-36	22.22	449.93	71.95	360.00	-	-	17.97	181	0.0910	1.63
Dec-37	20.56	392.24	14.75	-	-	-	377.49	193	0.0776	29.29
Dec-38	17.43	345.64	14.67	360.00	-	-	(29.04)	205	0.0662	(1.92)
Dec-39	12.01	309.06	12.09	720.00	-	-	(423.03)	217	0.0565	(23.88)
Dec-40	11.05	277.65	13.27	360.00	-	-	(95.63)	229	0.0482	(4.61)
Dec-41	8.38	194.71	11.99	-	-	-	182.72	241	0.0411	7.51
Dec-42	5.46	107.53	9.42	360.00	-	-	(261.89)	253	0.0350	(9.18)

### Exhibit 3 Discounted Cash Flow Analysis

(\$ in thousands)

<b>EOL Surface Remediation Costs</b>	\$ 1,950.00
<b>Capital to Remove Facilities</b>	\$ 224.00
<b>Discount Rate</b>	16.00%

Month	Culver City Net BOE	Operating Cash Flow	Maintenance Capex	Abandonment Cost	EOL Surface Remediation Costs	Capital to Remove Facilities	Cash Flow after EOL Obligations	Number of Periods	Discount Factor	Discounted Cash Flow
Dec-43	3.19	42.24	6.32	360.00	-	-	(324.08)	265	0.0299	(9.69)
Dec-44	3.02	38.19	6.73	-	-	-	31.46	277	0.0255	0.80
Dec-45	2.87	34.38	7.16	-	-	-	27.22	289	0.0218	0.59
Dec-46	2.73	30.78	7.73	-	-	-	23.06	301	0.0186	0.43
Dec-47	2.59	26.27	8.49	-	-	-	17.78	313	0.0158	0.28
Dec-48	2.46	23.08	8.96	-	-	-	14.11	325	0.0135	0.19
Dec-49	2.33	20.07	9.20	-	-	-	10.88	337	0.0115	0.13
Dec-50	2.21	17.24	9.67	-	-	-	7.57	349	0.0098	0.07
Dec-51	2.10	14.57	-	-	-	-	14.57	361	0.0084	0.12
Dec-52	1.74	12.06	-	-	-	-	12.06	373	0.0072	0.09
Dec-53	0.37	10.58	-	360.00	-	-	(349.42)	385	0.0061	(2.13)
Dec-54	0.35	9.72	-	-	-	-	9.72	397	0.0052	0.05
Dec-55	0.32	8.93	-	-	-	-	8.93	409	0.0044	0.04
Dec-56	0.15	4.19	-	180.00	1,950.00	224.00	(2,349.81)	421	0.0038	(8.90)
<b>Total</b>	<b>857.38</b>	<b>\$ 15,723.77</b>	<b>\$ 1,198.76</b>	<b>\$ 7,920.00</b>	<b>\$ 1,950.00</b>	<b>\$ 224.00</b>	<b>\$ 4,431.01</b>			<b>\$ 5,162.86</b>

## Technical Memorandum

**Date:** June 16, 2021  
**To:** Erin Gleaton, Sentinel Peak Resources  
**From:** Daniel Tormey, Ph.D., P.G.  
**RE:** **Comments for City of Culver City Consideration of Amortization and Termination of Inglewood Oil Field**

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The City of Culver City Council is considering the potential amortization and termination of oil-related activities within the City portion of the Inglewood Oil Field. The reasons provided include the implication that there are uncontrolled and unmonitored environmental risks at the field. However, the basis for the amendment to the zoning code fails to consider that the operator of the Inglewood Oil Field developed, together with the County of Los Angeles, a Community Services District (CSD) that applied state-of-the art monitoring and environmental protections across the field. The City of Culver City was invited to participate in the process but declined. In any case, field operators under the CSD have applied all the provisions to both the County and City jurisdictions. As described in this Memorandum, the CSD addresses the environmental concerns stated by the City, and shows that rather than ongoing threats, the concerns are monitored, measured, found to not be significant, and are actively managed by agencies with enforcement authority. The Memorandum also demonstrates that reduction in California production of oil and gas, as proposed by this ordinance, leads to an increase in the imports by tanker ship to replace the lost domestic oil production. Considering life cycle greenhouse gas emissions, the increase in marine tankering leads to a net increase in greenhouse gas emissions.

The CSD was developed over a period of almost two years, and included detailed environmental study and quantitative risk assessment, as well as the surrounding communities' sight, sound, odor and safety concerns. The process included over a dozen community meetings and hearings, and extensive review and public input. The improvements to the environmental condition of the Inglewood Oil Field were further enhanced by mitigation measures in the Environmental Impact Report for the CSD, which was certified in 2008. The CSD was adopted by the Los Angeles County Board of Supervisors on October 28, 2008.

The CSD is a living plan that can be adapted in response to new information. The County may review and modify the CSD in five-year intervals. The California Council on Science and Technology (CCST) conducted a comprehensive analysis of well stimulation in oil and gas wells

and identified the environmental studies at the Inglewood Oil Field as comprehensive and recommended them as a model for other oil and gas fields in the state<sup>1</sup>.

What does the CSD, which is applied consistently by the field operators in Los Angeles County and the City of Culver City, address? All of the environmental concerns cited in the proposed amendment to the zoning code, and much more:

- Groundwater monitoring, with reports provided to the Los Angeles Regional Water Quality Control Board and the County.
- Ground surface level monitoring and analysis of change with reporting to the County.
- Seismic monitoring, integrated with the Southern California seismic monitoring array and periodic review by researchers at California Institute of Technology.
- Environmental compliance monitoring and reporting of air quality and air emissions, infrastructure condition and maintenance, fire protection, chemical containment, storage, and disposal, biological resources, cultural resources, paleontological resources, and cleanup of historic contamination.
- Restoration and erosion control measures required by the CSD and by water quality permits enforced by the Los Angeles Regional Water Quality Control Board.
- CalGEM requirements for all subsurface aspects of oil and gas development and water injection.
- Los Angeles County Department of Public Health conducted an epidemiological study that compared incidence of health-related outcomes of the population near the oil field compared to the County as a whole and found no oilfield-related concerns; this study is currently being expanded by the County with results expected this year.
- Community Advisory Panel (CAP) – Designed to enhance communication between community representatives, the county, and the field operator.
- Website and Annual Newsletter – Designed to provide the public updated information on oil field operations.
- Ombudsperson – Dedicated person to responding to the public’s questions and concerns related to the oil field operations.
- Landscaping Plan – Designed to create a visual screening along the outer boundary of the CSD and along public streets that run through the oil field.

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<sup>1</sup> CCST and Lawrence Berkeley National Lab, 2015. An Independent Scientific Assessment of Well Stimulation in California.

- Quiet Mode Plan – Identifies methods to prevent, reduce, or mitigate the noise generated by drilling at night.
- Air Monitoring Plan – Requires installations of automatic alarms to detect if odorous natural gases exceed CSD thresholds.
- Community Alert Notification System – Automatic notification system in the event of an emergency related to operations.
- Annual Drilling Plan – Identifies future oil field drilling activity and enhances the public’s awareness of future planned activities.

Taken together, the Inglewood Oil Field is the most-studied major oil field in the state, and has among the most, if not the most, detailed environmental protections of any major oil field in the state.

The first comprehensive review of the CSD concluded that the provisions of the CSD were effective and no modifications to the current language were recommended. However, the County made the following recommendations that the former operator (FM O&G) implemented:

- Add interested residents to the Community alert Notification (CAN) tests
- Install the remaining landscape phases (Phase 6 on Fairfax and 7 on Stocker remain)
- Eliminate below ground sumps
- Add groundwater wells per RWQCB to include new wells that were installed for a 2012 study on the field
- Monitor perimeter fencing due to un-authorized access
- Facilitate better communication when scheduling rework and maintenance rigs in the field to avoid too many rigs in any one area
- Community Meetings’ focus needs to be on oilfield operations and issues

The second periodic review has been partially completed, but full completion is awaiting the second County health risk assessment and the California Air Resources Board implementation of the Study of Neighborhood Air near Petroleum Sources (SNAPS) program to better understand potential impacts of criteria pollutants and toxic air contaminants in neighborhoods near oil and gas activities<sup>2</sup>. The program includes limited-term, intensive air quality monitoring with a particular focus on production facilities, including the Inglewood Oil Field.

In summary, the comprehensive guidelines put forth in the CSD are unique to the Inglewood Oil Field and regulate nearly every aspect of the oil field’s daily operations. These regulations make the Inglewood Oil Field the most stringently regulated oil field in California. The CSD is subject to

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<sup>2</sup> California Air Resources Board. “Study of Neighborhood Air near Petroleum Sources.” CARB, April 2019. <https://ww2.arb.ca.gov/our-work/programs/study-neighborhood-air-near-petroleum-sources/about>

review every five years, and the current review includes the very concerns that are cited in the proposal to amend the zoning ordinance. The CSD, and its application in the Culver City portion of the field, undermines the claims that there are unknown and unstudied public concerns that somehow justify phasing out production at the field.

With respect to greenhouse gas emissions, the City's action would lead to a net increase in greenhouse gas emissions. Overall crude demand has held steady in California for the past 20 years, but the percent of domestic (California) production has declined. Crude oil imports from Saudi Arabia, Ecuador, Columbia, Iraq, Kuwait, and Alaska have offset the decline of California production over the last two decades<sup>3</sup>. Because California does not have any interstate pipelines that supply crude oil to the State from other states, it is isolated from the larger national petroleum network and therefore must rely on foreign and Alaskan sources of oil that are transported by marine tankers. Any reduction in supply from the Inglewood Oil Field cannot be offset by increasing imports from another state. The marine transport emits greenhouse gases and leads to a net increase in lifecycle greenhouse gas emissions if the City adopts this measure. Locally produced oil directly offsets those emissions and also reduces the demands on L.A. County's port system. Furthermore, overseas oil production is not conducted to the rigorous environmental standards mandated by the CSD, which is the most restrictive regulatory structure in California.

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<sup>3</sup> U.S. Energy Information Administration. 2019. Crude Oil Production. Available: [https://www.eia.gov/dnav/pet/pet\\_crd\\_crpdn\\_adc\\_mbb1\\_a.htm](https://www.eia.gov/dnav/pet/pet_crd_crpdn_adc_mbb1_a.htm). Last updated December 31, 2019. Accessed January 2, 2020.

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*FM O&G Inglewood Oil Field*  
Safety Inspection, Maintenance and  
Quality Assurance Program

*Safety Audit*

July 2016



Prepared for:  
*LA County*  
*Department of*  
*Regional Planning*



Prepared by:  
Marine Research Specialists (MRS)





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## SIMQAP Overview

Freeport McMoRan Oil and Gas (FM O&G) operates the Inglewood Oil Field in the County of Los Angeles and is subject to the Baldwin Hills Community Standards District (CSD) of the Los Angeles County Title 22 Zoning Code section 22.44.142. The CSD established permanent development standards, operating requirements and procedures for the portions of the Inglewood Oil Field that are within unincorporated Los Angeles County to protect the comfort, health, safety, and general welfare of people living, working, and recreating in the surrounding areas. CSD's Condition F.3 requires that the operator of the Inglewood Oil Field comply with all the provisions of a *Safety Inspection, Maintenance, and Quality Assurance Program* (SIMQAP). The SIMQAP provision is listed below:

### F.3 Safety Inspection, Maintenance, and Quality Assurance Program ("SIMQAP")

The operator shall comply with all provisions of a safety inspection, maintenance, and quality assurance program that has been approved by the director and the fire chief.

- a. SIMQAP Requirements. The SIMQAP shall, at a minimum provide for:
  - i. Inspection of construction techniques;
  - ii. Regular maintenance and safety inspections;
  - iii. Periodic safety audits;
  - iv. Corrosion monitoring and leak detection; and
  - v. Inspection of all trucks carrying hazardous and/flammable material prior to loading.
- b. SIMQAP Updates. The operator shall periodically review and revise the SIMQAP to incorporate changes in procedures, and new safety and maintenance technologies and procedures. The operator shall make such revisions at least every five years, or more frequently if the operator determines changes are necessary or if requested by the director or the fire chief. The operator shall submit SIMQAP updates to the director and the fire chief for their review and approval. The director shall complete the review of SIMQAP updates as soon as practicable, and shall either approve the updated SIMQAP or provide the operator with a list of specific items that must be included in the SIMQAP prior to approval. The operator shall respond to any request for additional information within 30 days of receiving such request from the director, unless extended by the director.
- c. Worker Notification. The operator shall ensure that all persons working on the oil field comply with all provisions of the currently approved SIMQAP.
- d. Inspections. The SIMQAP shall provide for involvement of County staff or the environmental compliance coordinator in all inspections required by this section.

The SIMQAP document, CSD F.3.b was approved by the County on April 13, 2011, and updated in May 2016 to reflect removal of certain tanks and other equipment. This report provides a summary of the review conducted for the first SIMQAP audit completed pursuant to CSD Provision F.3.a.iii.

## Audit Protocol

### SIMQAP Audit Items

A SIMQAP audit process includes both field inspections and document review by issue area experts and regulatory agency staff. A typical SIMQAP audit includes, but is not limited to, review of the following:

- Equipment inspection and maintenance records;
- Piping and Instrumentation Diagrams (P&IDs) to ensure they are up to date;
- Corrosion control and corrosion monitoring programs;
- Operator training records including recertification and revalidation;
- Management of Change (MOC) records;
- Flow, temperature, pressure level device inspections, PSV testing, etc.;
- Fire protection system inspections;
- Validation of emergency and process alarms and shutdown systems;
- Review and validation of procedures;
- Accident reports;
- Near miss program;
- Safety program management; and
- Corporate and facility audits.

### Inglewood Oil Field SIMQAP Audit

The audit completed for the Inglewood Oil Field was based on the inspection and maintenance programs outlined in the SIMQAP document initiated pursuant to the CSD condition F.3.b. The audit consisted of document review, review of onsite computer database training records, staff interviews, and field inspections over the course of scheduled compliance site visits conducted by the Environmental Compliance Coordinator. Site visits to perform the SIMQAP Audit were conducted on 4/8/15, 4/23/15, 5/7/15, 5/28/15, 6/4/15, 6/18/15, 6/25/15, 8/5/15, 8/20/15, 9/10/15, 9/17/15, 9/24/15, 9/29/15, 10/22/15, 11/5/15, 11/10/15, 11/24/15, 12/10/15, 12/22/15, 1/13/16, 1/28/16, 2/25/16, 3/16/16, 3/24/16, 4/6/16, 4/28/16, 5/17/16, and 6/8/16.

## Findings and Recommendations

### Findings

The results of the SIMQAP audit indicate that FM O&G is in compliance with the requirements of CSD Condition F.3, SIMQAP audit:

#### a.i. Inspection of construction techniques.

Two conduit installation projects were reviewed in the field: a conduit for future pipeline installation under La Cienega Boulevard and a conduit project under Stocker Street that was subsequently postponed and has not been completed to date. Field review of the construction projects included the Job Safety Analysis (JSA) document, building permits, and confirmation that "tail-gate" safety meetings occurred prior to initiation of construction activities. At both project sites, good Best Management Practices (BMPs) for storm water and sediment control were observed. Both construction projects were determined to be executed consistent with the construction technique requirements of the SIMQAP.

a.ii. Regular maintenance and safety inspections.

Completion of this SIMQAP audit along with the Periodic Review findings completed in September 2015 document compliance with the regular maintenance and safety inspection requirements of the SIMQAP.

a.iii. Periodic safety audits.

Completion of this SIMQAP audit fulfills the periodic safety audit requirement; additional safety audits will be scheduled in the future.

a.iv. Corrosion monitoring and leak detection.

Implementation of the inspection and monitoring program detailed in the Pipeline Integrity Manual, interviews with FM O&G pipeline staff, and the on site review of those inspection records as part of the safety audit demonstrate compliance with the corrosion monitoring and leak detection requirements of the SIMQAP.

a.v. Inspection of all trucks carrying hazardous and/flammable material prior to loading.

Review of the requirements in Section 6.4 of the SIMQAP, *Inspection of Trucks Carrying Propane and NGLs*, and field interview with FM O&G staff confirm compliance with the SIMQAP requirements.

b. SIMQAP Updates.

The SIMQAP document was updated, reviewed by the County and approved as part of this audit process.

c. Worker Notification. The operator shall ensure that all persons working on the oil field comply with all provisions of the currently approved SIMQAP.

Review at the FM O&G offices of the computer-based training records software program and of the 2015 training record documentation of FM O&G and sub-contractor staff demonstrate compliance with the SIMQAP requirements for worker notification.

d. Inspections. The SIMQAP shall provide for involvement of County staff or the environmental compliance coordinator in all inspections required by this section.

FM O&G provided access to the Inglewood Oil Field facility, a computer terminal to review training and inspection records, and hard copy documentation to facilitate completion of the SIMQAP audit.

No significant issues or deficiencies were noted during the audit process.

## Recommendations

The volume and number of records required by the CSD and other regulatory agencies such as DOGGR and the SCAQMD for the operation and maintenance of the Inglewood Oil Field are extensive. The review of certain documentation necessary to complete the SIMQAP audit review can be facilitated by enhanced recordkeeping and organization of the applicable documentation.

### Audit Recommendation

It is recommended that FM O&G train staff involved with the recordkeeping and organization of the documentation reviewed during the SIMQAP audit. Staff awareness of the review requirements will facilitate future audit reviews and make the process more efficient for both FM O&G staff and the agency reviewers.

### Documents Reviewed

The documents and records reviewed as part of the SIMQAP audit are listed below. Note that much of the information and documentation reviewed during this audit consisted of internal FM O&G company operational records. Therefore, the review was conducted on-site at the Inglewood Oil Field offices and at the Inglewood Oil Field Gas Plant Control Room. FM O&G provided access to the audit team to inspection and training documentation tracked on computer software, review of hard copy records and checklists, and field verification visits. Appendix A contains some of the calibration and checklist forms evaluated during the audit as examples of the type and detail of the information reviewed.

### Compliance Plans

- SIMQAP
- Emergency Response Plan
- Pipeline Integrity Manual
- Spill Prevention, Control, and Countermeasure Plan (SPCC)
- Fire Protection Plan
- Hazardous Materials (Business Plan)

### Records/Checklists

- Supervisor Monthly Facility Self Inspection Maintenance
- Maximo® computer maintenance
- SCAQMD Rule 1173 inspection
- SCAQMD Rule 1148.1 well cellar inspection
- Employee and sub-contractor training
- Job Safety Analysis (JSA)
- VR compressor quarterly maintenance
- VR compressor quarterly electric maintenance
- Operator daily inspection
- Supervisor facility inspection
- ESD station checklist
- Fire extinguisher checklist
- Ladder inspection checklist
- Hazardous waste area checklist
- Gas detector calibration checklist
- Eye wash shower checklist
- Pipe inspection table
- Tank-sump-fans checklist
- Fire protection system checklist
- Oil pipe inspection table

- Pipeline and tank inspection reports
- Pressure relief valve tests
- Gas detector calibrations
- Pressure vessel checklists
- Daily gas plant checklist
- Control and alarm checklists

### **Audit Tracking Table**

The table on the following pages details items reviewed or checked as part of the SIMQAP audit. As noted above, records were reviewed on site at the Inglewood Oil Field. The audit tracking table details the records reviewed and Appendix A provides forms, starting with the Operator Daily Inspection List, of selected calibration and checklist documents reviewed to illustrate the type of information evaluated. Data redacted where applicable.

SIMQAP Item	FM O&G SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
<b>PSVs and PVSVs (Pressure Safety Valves and Pressure Vacuum Safety Valves*</b>				
Review maintenance records				
Review test records (tested annually)	Annually	Test Records	Review records on-site	Reviewed PSV records for 2013. Reviewed records 2012 to 2015. Third party testing company, Furmanite, does the testing. The testing is pursuant to ASME Code Section I and/or VIII Division 1 and National Board Inspection Code ANSI/NBIC-23 and complies with OSHA29 CFR Part 1910. Reviewed Water plant area PSVs and Stocker #2 Compressor PSV. No issues were noted.
Review event records as applicable (vent to atmosphere)		Event Record	Review records on-site Check on SCAQMD reporting	No vent to atmosphere releases occurred in 2015 or through May 2016.
Review follow-up/maintenance to event incidents		Follow-up Document	Review on-site Check follow-up completed	Not applicable, no PSV releases to atmosphere occurred.
Portable Gas Detectors	Monthly	Inspection/ Calibration Checklist	Review records on-site	Reviewed 3/28/16 calibration record, see example form in Appendix A. Tests are completed monthly, no issues were noted.



SIMQAP Item	FM O&G SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Pressure Vessels	Quarterly	Inspection/ Calibration	Review records on-site	<p>Reviewed gas plant documentation. Reviewed Pressure Vessel Check List on 3/8/16, the following are checked and logged:</p> <ul style="list-style-type: none"> <li>• pilot setting</li> <li>• pressure reading</li> <li>• psv setting</li> <li>• pressure alarm low and high</li> <li>• temp alarm low and high</li> </ul> <p>Reviewed gas plan pipeline checklist 3/8/16, the following are checked and logged:</p> <ul style="list-style-type: none"> <li>• pilot setting</li> <li>• pressure reading</li> <li>• psv setting</li> <li>• pressure alarm low and high</li> <li>• temp alarm low and high</li> </ul> <p>Reviewed daily gas plant checklist 3/9/16, the following are checked and logged:</p> <ul style="list-style-type: none"> <li>• pilot setting</li> <li>• pressure reading</li> <li>• psv setting</li> <li>• pressure alarm low and high</li> <li>• temp alarm low and high</li> </ul> <p>Reviewed the Gas Plant checklist for the LTS system, propane compressors, glycol units, vessels, main gas compressors, separators, storage vessels, sales gas line , inlet discharge separators, and pumps. No issues or problems were noted on the pressure vessel documentation.</p>

SIMQAP Item	FM O&G SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
<b>Control, alarm, shutdown (pressure, flow, temperature, and level) devices*</b>				
Review device maintenance records				
Review event records as applicable		Event Record	Review records on-site	Reviewed the overflow at Gunnite Basin incident. See below follow-up.
Review follow-up/maintenance to event incidents		Follow-up Document	Review on-site Check follow-up completed	Full process review resulting in a modification to the method of flow between tanks. A Management of Change (MOC) was completed. The MOC is an industry standard best practice used to ensure that safety, health and environmental risks are controlled when a company makes a change in their facilities, documentation, personnel, or operations.
Level Safety High & Level Safety Low (LSH/LSL)	Quarterly	Test Record	Review records on-site	Reviewed the 3/1/16 Tank Level Alarm Checklist; checklist includes high level alarm and low level alarm tests. Reviewed 2/22/16 BC Fresh Water Tank level indicator work order quarterly check. Reviewed 2/8/16 ING 10K Wash tank level indicator work order quarterly check. See example Tank Level Alarm Checklist in Appendix A. No issues noted.
Low Temperature Separation (LTS) - Exchangers	Monthly	Test Record	Review records on-site	FM O&G completes the tests monthly as required.
Low Temperature Separation (LTS)- Vessels	Monthly	Test Record	Review records on-site	FM O&G completes the tests monthly as required.
Pressure Sensors High-Low (PSHL)	Quarterly	Test Record	Review records on-site	FM O&G completes the tests monthly as required.

SIMQAP Item	FM O&G SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
<b>Emergency Shutdowns (ESDs)*</b>				
Review device maintenance records				
Review device test records			Review on-site	Reviewed test checklist.
Review event records as applicable			Review on-site Check follow-up completed	Test of the ESD was documented when SCE ordered the field shutdown on 9/24/15. SCE does not notify FM O&G ahead of their planned shutdown; therefore, FM O&G follows emergency shutdown procedures when notified by SCE. The field was powered down, and operated key systems shifted to generator power. No issues or problems were experienced. Vapor control was operational during the shutdown.
Review follow-up/maintenance to event incidents			Review on-site Check follow-up completed	No emergency shutdowns were recorded.
<b>Corrosion control, monitoring, and cathodic protection (facility and pipelines)</b>				
Pipeline Integrity Manual		Manual	Review Manual	Reviewed the manual onsite with FM O&G employee Jessica Paquette, Pipeline Integrity Specialist.
Review corrosion coupon quarterly check documentation		Test Record	Review records on-site	Reviewed records on FM O&G computer tracking program. No issues noted.
Review annual water analysis documentation		Analysis Document	Review records on-site	Reviewed records on FM O&G computer tracking program. No issues noted.
Review flow line maintenance program documentation		Manual	Review records on-site	The Pipeline Integrity Manual documents the maintenance procedures.
Review sacrificial anode inspection records		Test Records	Review records on-site	Reviewed records on FM O&G computer tracking program. No issues noted.
Pipelines (Urban Gas Intake	Quarterly	Test Records	Review records on-site	Reviewed oil pipeline test record summary

SIMQAP Item	FM O&G SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Line, Sales Discharge Line)				table. Pipelines are tracked and fit for service calculations are updated annually. See example test and inspection forms in Appendix A.
<b>NDT Inspections: Vessels, Tanks, Piping; Pipeline Surveys</b>				
Review visual inspection documentation		CAL OSHA Pipeline Integrity Inspection Program	Review records	Reviewed as part of Pipeline Integrity Manual review with records noted on computer tracking system. No issues noted.
Review ultra-sonic testing documentation		Test Records	Review records	Reviewed API 653 inspection report for Tank T3 Raw Tank. Reviewed API 570 inspection report for Pipeline P-175-B. Reviewed oil pipeline test record summary table. No issues noted. See example inspection form in Appendix A
Tank inspection records (5 year inspection interval)		Test Records	Review records	Reviewed January and February 2015 documentation. All tanks are tracked in data base system with future inspections scheduled.
Tank bottom leak detection, review visual check documentation		Test Records	Review records	Inspected the BC Tank Farm on 9/17/15; tank bottom visual checks. No staining, odors, or structural problems noted. Coatings and signage are in good shape. Field tank farms are routinely inspected routinely as part of the field visit protocol by the County Environmental Compliance Coordinator (ECC).

SIMQAP Item	FM O&G SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
<b>Equipment Repair and Maintenance Records</b>				
Repair records				Reviewed computer work order examples for the Slop tank, BC Tank Setting meter, and Surge tank T-11a valve. Documentation was complete and organized.
Welding		Records	Review records	Reviewed Job Safety Analysis (JSA) records at the Gas Plant control room. A JSA is a procedure which helps integrate accepted safety and health principles and practices into a particular task or job operation. In a JSA, each basic step of the job is identified along with potential hazards and recommendations on the safest way to do the job. JSAs reviewed were filled out completely, signed, and dated by the applicable staff.
NDTs (X-Rays, UT, MT, etc.)		Records	Review records	Reviewed computer work order examples.
Risk based inspection program documentation		Records	Review records	Reviewed computer work order examples.
Quality Assurance/Quality Control	SIMQAP	Records		Documented by various test and maintenance records.
Hand and Portable Power Tools Maintenance	Monthly	Records	Review records	Reviewed Supervisor Monthly Facility Self Inspection for January 2016 which includes the following checks: <ul style="list-style-type: none"> <li>• correct tool use</li> <li>• tools in good condition</li> <li>• ladder use and maintenance</li> <li>• guards in place and in operation</li> </ul> Documentation is completed monthly. See example in Appendix A.

SIMQAP Item	FM O&G SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Heaters and Exchangers	Quarterly	Records	Review records	Reviewed at Gas Plan control room, quarterly checks are completed as required.
Machinery and Equipment Inspection	Monthly	Records	Review records	Reviewed Supervisor Monthly Facility Self Inspection for January 2016, which includes the following checks: <ul style="list-style-type: none"> <li>• machine guards in place</li> <li>• proper maintenance</li> <li>• leak check</li> </ul> See example in Appendix A.
Materials Handling Equipment	Monthly	Records	Review records	Reviewed Supervisor Monthly Facility Self Inspection for January 2016, See example in Appendix A.
Materials Storage and Labeling	Monthly	Records	Review records	Reviewed Supervisor Monthly Facility Self Inspection for January 2016, See example in Appendix A.
Compressors	Quarterly	Records	Review records	Reviewed at Gas Plant control room; checks are completed quarterly.
Electrical - Motor Maintenance	Monthly	Records	Review records	Reviewed Supervisor Monthly Facility Self Inspection for January 2016. See example in Appendix A.
Electrical Panel Identification	Monthly	Records	Review records	Reviewed Supervisor Monthly Facility Self Inspection for January 2016. See example in Appendix A.
Pumps	Quarterly	Records	Review records	Reviewed T-VIC Injection pump checklist for October 2015. No issues noted. See example inspection form in Appendix A
Safety Manuals/Emergency Phone #s/Required Postings	Monthly	Records	Review records	Reviewed Supervisor Monthly Facility Self Inspection for January 2016. See example in Appendix A.
Satellite Accumulation Areas	Weekly	Records	Review records	Reviewed November 2015 checklist and

SIMQAP Item	FM O&G SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
				4/1/16 Weekly Visual Inspection of Satellite Accumulation Areas. Records completed as required. See example inspection form in Appendix A.
Security Gate Check	Monthly	Records	Review records	Reviewed November 2015 checklist.
Shutdown Valves (SDVs)- Liquid Discharge Line	Quarterly	Records	Review records	Reviewed Emergency Shutdown Valve Operation Inspection Reports dated 7/7/15 to 7/9/15. Gas , oil, gas injection, pump discharge line valve pressure and hand wheel operation checks are completed consistent with ANSI 300 and 600.
Tanks, Cellars, Sumps and Pumps (Production Facilities)	Quarterly	Records	Review records	<p>Reviewed the July 2015 tank level alarm checklist; documentation is completed as required quarterly.</p> <p>Well cellars are inspected during ECC site inspections. Water, oil or debris is noted and a work order is issued for cleanup.</p> <p>Reviewed BC Tank Setting BC Stock Tank #1 work order dated 11/2/15. Tasks included:</p> <ul style="list-style-type: none"> <li>• Leak inspection</li> <li>• Pump noise inspection</li> <li>• Pump vibration check</li> <li>• Grease bearings</li> <li>• Check pump sealCheck pump safeguards on in place</li> </ul> <p>All work documented as completed.</p>

SIMQAP Item	FM O&G SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Tanks, Sumps, and Cooling Fans (Gas Plant)	Quarterly	Records	Review records	Reviewed 3/28/16 inspection checklist. Tasks include: <ul style="list-style-type: none"> <li>• level check</li> <li>• condition check</li> <li>• leaks</li> <li>• vibration</li> </ul> All items completed, quarterly inspection documentation is kept at Gas Plant control room.
Vapor Recovery Compressor	Quarterly	Records	Review records	Reviewed records at Gas Plant control room. See example inspection form in Appendix A
Wakesha Power Generator	Quarterly	Records	Review records	Reviewed records at Gas Plant control room. All items completed and quarterly inspection documentation is kept at Gas Plant control room.
<b>Operating Procedures Updates and Revalidations</b>				
Review applicable updates to facility and pipeline procedures	Document	Records	Review program, if applicable	Reviewed procedures onsite with FM O&G employee Jessica Paquette, Pipeline Integrity Specialist.
Review applicable updates to maintenance procedures	Document	Records	Review program, if applicable	No recent updates to the operating procedures were noted. See Operators Daily Visual Inspection Form in Appendix A.
<b>Computerized maintenance management system</b>				
Review Maximo® maintenance records		Records	Review records	Reviewed March 2016 Supervisors Monthly Facility Self Inspection, as noted above, with Pat Gorski on facility computer.  See example in Appendix A.



SIMQAP Item	FM O&G SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
<b>Facility Documentation Review</b>				
Management Of Change (MOCs)		Records	Review records	MOC was completed for Gunnite basin incident as noted above.
P&IDs		Records	Review records	No changes to the P& IDs were identified during review. P&IDs are piping and instrumentation diagrams and drawings of the facility systems and only require updating for significant changes.
Cause & Effect Charts		Records	Review records	No records were completed or necessary.
HAZOPS/ PHA Revalidations		Records	Review records	No new HAZOPS or revalidations were completed or necessary.
<b>Other Inspection Programs</b>				
SCQAMD Rule 1148.1	Quarterly	Inspection Records	Review records	Reviewed well cellar inspection data pursuant to SCAQMD Rule 1148.1. Reviewed 1stQtr2015 documentation, 357 wells were inspected. No issues noted.
SCQAMD Rule 1173	Quarterly	Inspection Records	Review records	Reviewed SCAQMD Rule 1173 Component Inspection documentatation. Reviewed 1stQtr2015 records, 67,496 components in the field and 16,102 components at the gas plant were inspected. Six leaks were identified and repaired (4 on hatches, 1 on a man-way, and 1 valve).
SIMQAP		SIMQAP	Review document Update every five years	Original document dated May 2009 and approved 4/13/11. Reviewed and discussed as part of the audit. Updated in April 2016, reviewed and approved by the County.
<b>SPPC Plan</b>				
Version current and updated		SPCC	Review document	Reviewed document. Document approved. Current version dated June 2013.

SIMQAP Item	FM O&G SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
<b>Fire Protection Plan</b>				
Review plan		FPP	Review document	No separate plan, see ERP.
Check plan is current and approved			Check approvals and date	No separate plan, see ERP.
Review updates as applicable			Review updates	No separate plan, see ERP.
UFC Permits, current and approved		Permits	Review	Checked 2015 and 2016 CUPA/Annual Unified Program Facility permits. Approved by Fire Department. Reviewed LA County Fire Well permit; permit is current.
<b>Emergency Response Plan</b>				
Review plan		ERP	Review plan	Reviewed ERP with FM O&G staff. ERP was implemented successfully during pipeline spill drill completed in 2015.
Check plan is current and approved		ERP	Check approval dates	Current version dated June 2013 and is approved.
Review updates as applicable		ERP	Review	Updated June 2013.
Annual CAN test			Confirm CAN test	Tests are completed annually in November or December.
<b>Fire Protection and Detection Systems*</b>				
Review inspection records		Records	Review records	Reviewed January and February 2015 and April 2016 documentation for fire hoses and reels. See example inspection form in Appendix A
Review maintenance records		Records	Review records	Reviewed January and February 2015 and April 2016 documentation.
Review testing records		Records	Review records	Reviewed January and February 2015 and April 2016 documentation.
Fire Pump Inspection and Test Operated	Monthly	Records	Review records	Reviewed Fire Pump Performance Test dated 6/24/2015. Test completed by DCS Testing & Equipment Inc. No issues noted.
Fire Reels and Hose Boxes	Monthly	Records	Review records	Reviewed April 2016 documentation.

SIMQAP Item	FM O&G SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Fire Stand Pipes Monthly	Monthly	Records	Review records	Reviewed October 2015 checklist documentation.
First Aid and Lock-out/Tag-out Supplies	Quarterly	Records	Review records	Reviewed Supervisor Monthly Facility Self Inspection for January 2016. Checks include: <ul style="list-style-type: none"> <li>• adequate first aid supplies</li> <li>• lock out tag out</li> </ul> Recordkeeping is complete.
Gas Detectors Inspection and Calibration	Monthly	Records	Review records	Reviewed gas plant monthly test dated 3/21/16. Test included calibration and tests and are scheduled via work orders.
Emergency Eyewash & Safety Showers Station	Monthly	Records	Review records	Reviewed inspection checklist and October 2015 documentation. See example inspection form in Appendix A
Emergency Shut Down (ESD) Stations	Quarterly	Records	Review records	Switches were tested the first week of April 2016. Documentation completed.
ESD System	Annually	Records	Review records	Completed during turnaround event in September 2015.
Fire Detection Devices (Fire Eyes)	Monthly	Records	Review records	The Inglewood Oil Field no longer has this type of sensor. They were removed along with the building in which they were installed. No location at the facility requires them.
Fire Extinguishers	Monthly	Records	Review records	Reviewed October 2015 checklist data. Tests completed by a third party testing company.
Fire Extinguisher Maintenance	Annually	Records	Review records	Reviewed during regular ECC inspections and completed during annual inspection. See example inspection form in Appendix A.

SIMQAP Item	FM O&G SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Fire Hydrants	Monthly	Records	Review records	Reviewed Fire Monitor and Hydrant Test and Maintenance Records. Data checked includes: <ul style="list-style-type: none"> <li>• valves</li> <li>• flow</li> <li>• piping</li> <li>• paint</li> <li>• signage</li> <li>• quarterly flush</li> <li>• fire extinguishers</li> </ul> Records are kept as required.
Fire Monitors	Monthly	Records	Review records	Reviewed the March 2016 Deluge System and Fire Water Pump test and maintenance record. No issues noted.

SIMQAP Item	FM O&G SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Personal Protective Equipment (PPE)	Monthly	Records	Review records	<p>Discussed and reviewed with FM O&amp;G staff the People and Practice Observations card. The card is filled out weekly and includes a review of crew behavior and any issues. PPE gear is replaced at recommended manufacturer intervals.</p> <p>Reviewed Supervisor Monthly Facility Self Inspection for January 2016, which includes:</p> <ul style="list-style-type: none"> <li>• PPE use</li> <li>• no loose clothing</li> <li>• escape packs maintenance</li> <li>• fall harness use</li> <li>• noise protection</li> </ul> <p>Reviewed Vehicle First Aid, Eye Wash, Fire Extinguisher Inspection checklist for October 2015.</p> <p>See Supervisor Monthly Facility checklist in Appendix A.</p>
<b>Facility training procedures and protocol</b>				
Review training records		Records	Review records	Reviewed employee training records for the SIMQAP for year 2015. Training done for new employees and annually. Contractors are trained at same interval. Training is tracked with computer software.
Review sub-contractor training records		Records	Review records	Noise training was conducted on 11/24/15.
Incident/near miss program		Records	Review records	FM O&G does not have a formal program for incident/near miss. Incidents are discussed as necessary.

SIMQAP Item	FM O&G SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
JSA (Job Safety Analysis)		Records	Review records	Reviewed examples at the Gas Plant control room.
Root cause analysis		Records	Review records	No recent events required root cause analysis reports.
Review CSD awareness training records (Quiet Mode Drilling Plan, etc.)		Records	Review records	Training occurs annually and for new hires. Reviewed training records on facility computer tracking software. Training was completed for all employees and contractors. Reviewed Operator's Daily Visual Inspection for Pollution Checklist.
<b>OSHA Required Training Records</b>				
Review training records		Records	Review records	Reviewed Supervisor Monthly Facility Self Inspection for January 2016. Checks include: <ul style="list-style-type: none"> <li>• OSHA posters properly posted</li> <li>• MSDS current</li> <li>• proper signage</li> </ul> See inspection checklist in Appendix A
<b>Business Plan and Related Elements</b>				
Plan current and approved		Business Plan	Review Plan	Reviewed on January 4, 2016, updated and approved by County Fire annually. See Hazardous Waste Container Storage Area inspection checklist in Appendix A.
Plan reflects current use and location of hazardous materials			Review	Plan is reviewed and approved by County Fire and hazardous material areas inspected annually by County Fire.
<b>LPG/NGL Transportation Safety</b>				
Review truck loading terminal procedures		Gas Plant SOPs	Review SOPs	Page 16 of SIMQAP document includes the loading procedures.
<b>Gas Detectors*</b>				
Functional check records				Reviewed January and February 2015. Check

SIMQAP Item	FM O&G SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
(monthly)				documentation. No issues noted.
Maintenance record verification (monthly)		Records	Review records	See above.
ESD (simulated) Functional Check	Annual	Records	Review records	Demonstrated by SCE unannounced shutdown in December 2015.
Review applicable documentation		Records	Review records	Calibrations and check records are completed as required.

## Appendix A

### Selected Calibration and Record Review Forms



# Operator's Daily Visual Inspection for Pollution



Month: \_\_\_\_\_

Facility: Inglewood Gas Plant

Date	Inspection	Operator's Initials	Inspection	Operator's Initials	Comments
1	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
2	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
3	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
4	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
5	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
6	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
7	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
8	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
9	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
10	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
11	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
12	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
13	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
14	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
15	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		



# Operator's Daily Visual Inspection for Pollution

Month: \_\_\_\_\_

Facility: Gas Plant

Date	Inspection	Operator's Initials	Inspection	Operator's Initials	Comments
16	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
17	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
18	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
19	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
20	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
21	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
22	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
23	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
24	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
25	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
26	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
27	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
28	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
29	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
30	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		
31	All cellars inspected are free of oil or other liquid hydrocarbons except those noted under comments:		Facility does not show any signs of spilled oil or other liquid hydrocarbons		



# Supervisor's Monthly Facility Self Inspection

Date: \_\_\_\_\_

Facility: Inglewood Gas Plant

Description	Check If Action Required	Location / Comments / Action Required
<b>Personal Protective Equipment</b>		

Proper Minimum PPE being worn by all	_____	_____
Operators properly attired (No loose clothing, jewelry, etc)	_____	_____
Job task required PPE being utilized when required	_____	_____
SCBA and Escape units properly maintained and available for use	_____	_____
Fall harnesses with tie-off equipment maintained and available for use	_____	_____
High Noise areas properly marked, hearing PPE available	_____	_____

<b>Administrative</b>		
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OSHA, Labor Department and Workers Compensation posters properly displayed	_____	_____
Emergency Phone Numbers posted	_____	_____
Evacuation routes posted	_____	_____
MSDS Binder up to date and accessible to all personnel	_____	_____
Safety Manual up to date and accessible to all personnel	_____	_____
Facility properly marked and signed near entrances	_____	_____
Smoking policy enforced, signs posted	_____	_____

<b>Safety Equipment</b>		
-------------------------	--	--

Fire extinguishers maintained, marked and accessible	_____	_____
Fire reels maintained, marked and accessible	_____	_____
Exits marked and accessible	_____	_____
Safety shower and eyewash stations checked and functioning properly	_____	_____
Adequate first aid supplies	_____	_____
Lock-Out / Tag-Out supplies available	_____	_____
Portable gas detector properly maintained and available for use	_____	_____

<b>Housekeeping and Maintenance</b>		
-------------------------------------	--	--

Work areas maintained in a clean and orderly fashion	_____	_____
Floors, aisles, stairs and work areas free of obstructions, slipping and tripping hazards	_____	_____
Washrooms and change facilities clean and well maintained	_____	_____
Tools, equipment and materials properly stored when not in use	_____	_____
Waste materials stored in appropriate containers and disposed of in a safe manner	_____	_____
Adequate drinking water available	_____	_____
Ventilation systems working properly	_____	_____

<b>Hand and Portable Power Tools</b>		
--------------------------------------	--	--

Correct tools provided and being used	_____	_____
Hand and portable power tools in good condition	_____	_____
Ladders properly maintained and in good condition. Wood and fiberglass ladders not painted	_____	_____
Portable ladder extend three rungs above landing and are properly secured while in use	_____	_____
Hand and portable power tools in good condition	_____	_____
Guards in place and properly adjusted	_____	_____

Description	Check if Action Required	Location / Comments / Action Required
-------------	--------------------------	---------------------------------------

<b>Electrical</b>		
Panels properly identified and labeled	_____	_____
Motors clean and free of oil, grease and dirt	_____	_____
Electrical rooms clean and dry	_____	_____
GFCI protection available for portable tools used outside	_____	_____
Only certified personnel work on equipment over 240V	_____	_____
Extension cords used for temporary power only and are in good condition without tape repairs	_____	_____

<b>Machinery and Equipment</b>		
Machine guards in place around moving parts	_____	_____
Equipment properly maintained	_____	_____
Leaks around equipment, contained, cleaned up and repaired	_____	_____

<b>Materials Handling and Storage</b>		
Material handling equipment in good condition	_____	_____
Storage areas properly illuminated	_____	_____
Cylinders properly secured and capped when not in use	_____	_____
Slings identified and inventoried	_____	_____
Overhead cranes properly maintained, control well marked and personnel qualified to operate them	_____	_____
Safety latch on hook of crane	_____	_____
Crane labeled for maximum lifting capacity	_____	_____
Hazardous materials properly stored and labeled	_____	_____
Process equipment properly labeled	_____	_____

<b>Spill Kits</b>		
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

<b>Compliance</b>		
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Inspected By: \_\_\_\_\_



**Test and Maintenance Record**  Monthly Check  
**Safety and Anti-Pollution Equipment**  Quarterly Check

Date: ██████████

Portable Gas Detectors

Facility: Inglewood Gas Plant

Manufacturer	Model	Serial Number	Calibration Date	Calibration Due	Battery OK or Volts	Operation OK	Detectors			Operator's or Tester's Initials
							LEL %	O2 %	H2S ppm	
RKI INSTRUMENTS	EAGLE	E064130								
RKI INSTRUMENTS	HS-01	559010035 RN								
RKI INSTRUMENTS	HS-01	661020089 RN								
GMI	GT	614275								

Comments:

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Note: If detector indicates anything other than "Zero" values (LEL = 0 ppm; H2S = 0 ppm; O2 = 20.8-21.0%; CO = 0 ppm), manually reset or adjust the zero according to manufacturer's directions. **If unit is due for calibration, needs repair or will not zero, tag and return to Compliance Department. Portable gas detectors are to be calibrated at least every 90 days.** Be sure to include a description of the problem and what you have done to try and rectify the problem. **Do Not** place a deficient unit in service! Your life may depend on it!



Plains Exploration & Production Company  
 Inglewood Field  
 Oil Pipelines  
 Exempt from testing if <10 years old

Pipeline to be tested

Map Notation	From Setting	To Production Tank	Size	Type	Grade	Date Installed	Operating Pressure	Test Pressure	Test Duration	Date Tested	Next Test Date	Length (ft)	Comments
1	BC 15 Setting	BC #1	6" and 8"	steel	sch 40								
2	BC 22 Setting	BC #1	6"	steel	sch 40								
3	LAI 13 Setting	LAI	8" 10" and 12"	steel	sch 40								
4	LAI 25 Setting	LAI	6"	steel	sch 40								
5	LAI 35 Setting	LAI	6"	steel	sch 40								
6	LAI 220 Setting	LAI	6"	steel	sch 40								
7	Vic 1-12 #1 Setting	LAI	8" and 10"	steel	sch 40								
8	Vic 1-12 #2 Setting	LAI	8" and 10"	steel	sch 40								
9	Vic 2 Setting	LAI		steel	sch 40								
10	TVIC 1 & 4 Setting	TVIC	6" thru 12"	steel	sch 40								
11	TVIC 2 & 3 Setting	TVIC	6" thru 12"	steel	sch 40								
12	Cone Setting	BC #2	6" 8" and 10"	Fiberglass									
13	Ruble Setting	BC #2	8"	steel									
14	Shell Setting	BC #2	8"	steel									
15	LAI 62 Setting	BC #2	6"	steel	sch 40 and 80								
16	LAI 1E Setting	BC #2	8"	steel	sch 40 and 80								
17	Stocker Setting	BC #2	8" and 12"	steel	sch 40 and 80								





Unit : Inglewood-Piping  
 Eq/Circ ID : \*  
 Comp ID : \*  
 Type : \*  
 Class : \*  
 RBI : \*  
 Service : \*

Unit	Eq/Circ ID	Comp ID	TML Number	Location	Ctn TML	TML Inspection Due Date	Last Survey Thickness Nt	Last Survey Date	T-Min	Rep TML CR	TML Retirement Date	TML Life
Inglewo od-Piping	1-1ESETT-2-PO-1605	PIPE	1.02	HORZ 90°								
Inglewo od-Piping	1-1ESETT-2-PO-2411	PIPE	1.03	HORZ 180°								
Inglewo od-Piping	1-1ESETT-2-PW-1595	PIPE	1.02	HORZ 90°								
Inglewo od-Piping	1-1ESETT-3-PG-1598	PIPE	1.02	HORZ 90°								
Inglewo od-Piping	1-1ESETT-3-PG-1598	PIPE	1.03	HORZ 180°								
Inglewo od-Piping	1-1ESETT-3-PG-1598	PIPE	1.04	HORZ 270°								
Inglewo od-Piping	1-1ESETT-3-PG-1598	PIPE	3.01	HORZ 0°								
Inglewo od-Piping	1-1ESETT-3-PG-1598	PIPE	3.02	HORZ 90°								
Inglewo od-Piping	1-1ESETT-3-PG-1598	PIPE	3.03	HORZ 180°								



## Weekly Visual Inspection of Satellite Accumulation Areas

Facility: Inglewood Production

Week	Inspection	OK?	Operator's Initials	Comments
<b>Old Yard</b>				
1	Containers and containment system are in good condition with no indications of damage, leaks, deterioration or corrosion.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	[REDACTED]	
2	Containers and containment system are in good condition with no indications of damage, leaks, deterioration or corrosion.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	[REDACTED]	
3	Containers and containment system are in good condition with no indications of damage, leaks, deterioration or corrosion.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	[REDACTED]	
4	Containers and containment system are in good condition with no indications of damage, leaks, deterioration or corrosion.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	[REDACTED]	
5	Containers and containment system are in good condition with no indications of damage, leaks, deterioration or corrosion.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	[REDACTED]	



Monthly Check

Date: \_\_\_\_\_

Facility: Inglewood Production

**Tanks Level Alarm Check List**

Description and Location	Tanks, Cellars and Sumps		Operator's or Tester's Initials	Comments
	high level Alarm Check?	Low Level Alarm Check?		
Inglewood#1 5K Stock Tank				
Inglewood#1 10K Wash Tank				
Inglewood #2 3K Stock Tank				
Inglewood #2 10K Wash Tank				
Inglewood #3 10K Wash Tank				
Inglewood #4 10K Wash Tank				
BC 3K Stock Tank				
BC 5K Wash Tank				
Inglewood & BC 1K Sldby Stock Tank				
T-Vic 5K Stock tank				
T-Vic#1 5K Wash tank				
T-Vic#2 5K Wash tank				
T-Vic 5K Prewemco Tank				
T-Vic 5K Clean Tank				
T-Vic 3K Slop Tank				
T-Vic 500 bbl Rain Run Off Tank				
VIC-2 Pool Trap Vessel				
Gumite Tank 5K				
TVIC FRESH 1K water tank				

Date: \_\_\_\_\_

Facility: \_\_\_\_\_

Inglewood Production

**Fire System and Miscellaneous Check List**

Description and Location	Did You Flush Lines ?	Hose and Nozzle Check	Condition Check	Operator's or Tester's initials	Comments
1. Fire Hose Reel (Halfway House)					
2. 2" Fire Stand Pipe BC-15 AWT					
3. 2" Fire Stand Pipe BC-22 AWT					
4. 2" Fire Stand Pipe 62 AWT					
5. 2" 1-1 East Fire Stand Pipe					
6. 2" STK AWT Fire Stand Pipe					
7. Inglewood-Tks Fire Reels					
8. 2" Fire Stand Pipe 35 AWT					
9. 2" Fire Stand Pipe ING TKS					
10. 2" Fire Stand Pipe 25 AWT					
11. 2" Fire Stand Pipe Shell AWT					
12. 2" Fire Stand Pipe LAL 13 AWT					
13. 2" Fire Stand Pipe LAL 220 AWT					
14. 2" Fire Stand Pipe Vic 1-12 AWT					
15. 2" Fire Stand Pipe Rubel AWT					
16. 2" Fire Stand Pipe Cone AWT					
17. 2" Fire Stand Pipe TVIC AWT'S					
18. 2" Fire Stand Pipe TVIC Frewenco					
19. 2" Fire Stand Pipe TVIC Tks upper					
20. 2" Fire Stand Pipe TVIC Tks lower					
21. Fire Reels TVIC W/P					
22. Fire Reels TVIC W/P					
23. Fire Hose Reel VIC 2 AWT Area					
24. 2" Fire Stand Pipe VIC 2 AWT Area					

**Test and Maintenance Record**  
**Safety and Anti-Pollution Equipment**

Date: \_\_\_\_\_

**Fire Extinguisher Inspections**

Facility Inglewood Gas Plant

Location	Extinguisher Number	Hydro Test Date	Annual Inspection Date	Size lbs	Fire Rating (A, B, C)	Type	*Fully Charged? (Yes or No)	Safety Pin Secured? (Yes or No)	Cylinder in Good Condition? (Yes or No)	Hose in Good Condition? (Yes or No)	Properly Mounted? (Yes or No)	Properly Signed? (Yes or No)	Comments
Relief Truck #257	1		6/14	20	10-A.80-B:C	<input checked="" type="checkbox"/> Cartridge <input checked="" type="checkbox"/> Pressurized	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Propane Loading Station, South Side	2		6/14	300	40-A.320-B:C	Wheeled	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Metal Building, North Side	3		6/14	30	B,C	<input type="checkbox"/> Cartridge <input checked="" type="checkbox"/> Pressurized	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Bullet Tanks, Southwest Side	4		6/14	30	Purple K	<input type="checkbox"/> Cartridge <input checked="" type="checkbox"/> Pressurized	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Bullet Tanks, East Side	5		6/14	30	B,C	<input type="checkbox"/> Cartridge <input checked="" type="checkbox"/> Pressurized	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Heat Medium Heater, South Side	6		6/14	30	B,C	<input type="checkbox"/> Cartridge <input checked="" type="checkbox"/> Pressurized	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Flare, West Side	7		6/14	30	B,C	<input type="checkbox"/> Cartridge <input checked="" type="checkbox"/> Pressurized	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Amine Skid, West Side	8		6/14	30	B,C	<input type="checkbox"/> Cartridge <input checked="" type="checkbox"/> Pressurized	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
V-25, Southwest Side	9		6/14	30	B,C	<input type="checkbox"/> Cartridge <input checked="" type="checkbox"/> Pressurized	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Depropanizer Cooling Fan, West Side	10		6/14	30	Purple K	<input type="checkbox"/> Cartridge <input checked="" type="checkbox"/> Pressurized	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Urban Gas Discharge Cooling Fan, West Side	11		6/14	30	Purple K	<input type="checkbox"/> Cartridge <input checked="" type="checkbox"/> Pressurized	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
C-0520, Southwest Side	12		6/14	30	B,C	<input type="checkbox"/> Cartridge <input checked="" type="checkbox"/> Pressurized	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
MCC C Building, outside (CO2)	13		6/14	30	C	<input type="checkbox"/> Cartridge <input checked="" type="checkbox"/> Pressurized	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
A-Room, South Wall	14		6/14	30	B,C	<input type="checkbox"/> Cartridge <input checked="" type="checkbox"/> Pressurized	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
A-Room, North East	15		6/14	30	B,C	<input type="checkbox"/> Cartridge <input checked="" type="checkbox"/> Pressurized	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
MCC D Building outside (CO2)	16		6/14	30	C	<input type="checkbox"/> Cartridge <input checked="" type="checkbox"/> Pressurized	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Break Area	17		6/14	30	A,B,C	<input type="checkbox"/> Cartridge <input checked="" type="checkbox"/> Pressurized	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Chemical Skid	18		6/14	30	A,B,C	<input type="checkbox"/> Cartridge <input checked="" type="checkbox"/> Pressurized	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Amine Contactor	19		6/14	30	A,B,C	Wheeled	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Compressor 550 North East	20		6/14	30	A,B,C	<input type="checkbox"/> Cartridge <input checked="" type="checkbox"/> Pressurized	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Inspected By: \_\_\_\_\_

\*Note: Gauge should be in the green for pressurized units and the cartridge should be in good shape and not punctured for the cartridge operated units.



**Inspection Checklist Inglewood Field**  
**Hazardous Waste Container Storage Area**

**Location** Old yard-Barrel Rack  
**Date**

Week Ending

- Are there any unknown HW containers?
- Are there any corroded rusty drums
- Are there any deteriorated HW drums
- Are there any bulging HW drums
- Are there any dented HW drums
- Are there any leaking or overfilled HW drums?
- No metal mixed with trash?
- Is there any staining or spillage in storage area?
- Are HW drums missing information on the labels?
- Are there any HW drums stored incompatibly?
- Hazardous waste segregated from non-hazardous waste streams?
- Is there emergency equipment near the hazardous waste storage area?(fire Ext, Fire hose)
- Are hazardous containers properly labeled?
- Are HW drums missing information on the labels?
- Are HW drums not compatible with the contents?
- Are HW drums stored in rows with less than 30" of aisle space?
- Have the HW drums exceeded the 90 day limit?
  - Flammables/reactives HW drums stored less than 50 feet from property line?
- Are incompatible hazardous wastes separated from each other by a berm, dike, wall?
- Does the storage area contain secondary containment?
- Are the containers and areas where they are stored inspected for leaks as least weekly?
- Is each container kept closed, except when adding or removing waste?
- Hazardous waste containers closed/sealed?

YES	NO

Observations:  
  
Corrective action required:  
  
Completed by:  
  
**In Case of Emergency Call FMOG EH&S 1-800-766-4108**  
Reported to FMOG Staff:

## Test and Maintenance Record Safety and Anti-Pollution Equipment

Date: \_\_\_\_\_  
Facility: Inglewood Gas Plant

### Emergency Eye Wash / Safety Showers

Type and Location	Properly signed?		Path to unit clear?		Nozzle Covers Installed and in Good Repair?		Valve handle in good repair?		Checked for adequate flow and flushed weekly?		Self Contained Units Adequate Fluid Level?		Operator's or Tester's Initials		Comments
	Yes	No	Yes	No	Yes	No	Yes	No	Eyewash	Shower	Yes	No	Operator's Initials	Tester's Initials	
Eyewash & Shower next to BlastShack	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Eyewash & Shower next to Bulk Chemical	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

*\*Fluid in self contained units is to be changed weekly if tap water is used, every three to six months if mixed with a manufacturer's preservative.*







**Work Order Details**

**INGLWOOD**

**Work Order # : 499356**

**Job Plan: 1146**

**Status:** CLOSE  
**Report Date:** [REDACTED]

**Supervisor:** [REDACTED]  
**PM Code:**  
**Reported By:** [REDACTED]

**Sched. Start Date:**  
**Sched. Finish Date:**

**Location:** BC  
**Asset:** C-BC-SCREW

**Description:** INGLEWOOD, BALDWIN CIENEGA  
**Description:** COMPRESSOR, GAS COMP SCREW

**Asset Parent:**  
**Failure Class:** COMPRESSOR

**WO Description:**

VAPOR RECOVERY SCREW COMPRESSORS 6 MONTH (MECHANICAL)

**Long Description:**

Lead	Crew	Work Type	PM Due Date	Priority	PM Num
[REDACTED]	MECH	PM	[REDACTED]	1	5465

**Problem:** \_\_\_\_\_ **Cause:** \_\_\_\_\_ **Action:** \_\_\_\_\_

**Corrective** \_\_\_\_\_

**Miles** \_\_\_\_\_

**Meter Reading:** \_\_\_\_\_ **Hours**

**Completed By:** \_\_\_\_\_

**Completed Date:** \_\_\_\_\_

**Material Cost:** \_\_\_\_\_

**Vendor:** \_\_\_\_\_

Task	Measurement	Value	Date	Observation
10 DRAIN AND REPLACE LUBRICATOR BOX OIL.		0		
20 CHANGE OIL FILTER OR WHEN DIFFERENTIAL PRESSURE EXC		0		
30 CLEAN OIL STRAINER WHEN OIL IS		0		

Task	Measurement	Value	Remarks/Observations
			CHANGED.
40	CHECK FOR ANY UNUSUAL NOISES AND REPAIR.	0	
50	CHECK FOR ANY UNUSUAL VIBRATIONS AND REPAIR.	0	
60	CHECK FOR ANY OIL LEAKS AND REPAIR.	0	
90	VISUALLY GIVE THE COMPRESSOR AND OVERALL INSPECTION AND BE SURE SAFEGUARDS ARE IN PLACE.	0	







*SPR Inglewood Oil Field*  
Safety Inspection, Maintenance and  
Quality Assurance Program

*Safety Audit*

August 2018



Prepared for:  
*LA County*  
*Department of*  
*Regional Planning*



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## SIMQAP Overview

Sentinel Peak Resources (SRP) operates the Inglewood Oil Field in the County of Los Angeles and is subject to the Baldwin Hills Community Standards District (CSD) of the Los Angeles County Title 22 Zoning Code section 22.44.142. The CSD establishes permanent development standards, operating requirements and procedures for the portions of the Inglewood Oil Field that are within unincorporated Los Angeles County to protect the comfort, health, safety, and general welfare of people living, working, and recreating in the surrounding areas. CSD's Condition F.3 requires that the operator of the Inglewood Oil Field comply with all the provisions of a *Safety Inspection, Maintenance, and Quality Assurance Program* (SIMQAP). The SIMQAP provision is listed below:

### *F.3 Safety Inspection, Maintenance, and Quality Assurance Program ("SIMQAP")*

*The operator shall comply with all provisions of a safety inspection, maintenance, and quality assurance program that has been approved by the director and the fire chief.*

- a. SIMQAP Requirements. The SIMQAP shall, at a minimum provide for:*
  - i. Inspection of construction techniques;*
  - ii. Regular maintenance and safety inspections;*
  - iii. Periodic safety audits;*
  - iv. Corrosion monitoring and leak detection; and*
  - v. Inspection of all trucks carrying hazardous and/flammable material prior to loading.*
- b. SIMQAP Updates. The operator shall periodically review and revise the SIMQAP to incorporate changes in procedures, and new safety and maintenance technologies and procedures. The operator shall make such revisions at least every five years, or more frequently if the operator determines changes are necessary or if requested by the director or the fire chief. The operator shall submit SIMQAP updates to the director and the fire chief for their review and approval. The director shall complete the review of SIMQAP updates as soon as practicable and shall either approve the updated SIMQAP or provide the operator with a list of specific items that must be included in the SIMQAP prior to approval. The operator shall respond to any request for additional information within 30 days of receiving such request from the director, unless extended by the director.*
- c. Worker Notification. The operator shall ensure that all persons working on the oil field comply with all provisions of the currently approved SIMQAP.*
- d. Inspections. The SIMQAP shall provide for involvement of County staff or the environmental compliance coordinator in all inspections required by this section.*

The SIMQAP document, CSD F.3.b was approved by the County on April 13, 2011, updated in May 2016 and approved by the County in June 2016 to reflect removal of certain tanks and other equipment. As noted, under provision F.3.a.iii above, the SIMQAP requires periodic safety audits. The first SIMQAP audit was completed in July 2016. This report provides a summary of the review conducted for the second SIMQAP audit completed pursuant to CSD Provision F.3.a.iii.

## 2016 SIMQAP

As noted above, the first SIMQAP audit was completed in July 2016 and included one audit finding involving recordkeeping and document organization. The audit recommended that the operator train staff in enhanced recordkeeping and organization to facilitate future audit reviews and make the process more efficient for operator staff and agency reviewers. For the 2018 audit, the operator provided dedicated staff to assist with the review and the audit process was significantly more efficient and timelier than the 2016 audit.

## Audit Protocol

### SIMQAP Audit Items

A SIMQAP audit process includes both field inspections and document review by issue area experts and regulatory agency staff. A typical SIMQAP audit includes, but is not limited to, review of the following:

- Equipment inspection and maintenance records;
- Piping and Instrumentation Diagrams (P&IDs) to ensure they are up to date;
- Corrosion control and corrosion monitoring programs;
- Operator training records including recertification and revalidation;
- Management of Change (MOC) records;
- Flow, temperature, pressure level device inspections, PSV testing, etc.;
- Fire protection system inspections;
- Validation of emergency and process alarms and shutdown systems;
- Review and validation of procedures;
- Accident reports;
- Near miss program;
- Safety program management; and
- Corporate and facility audits.

### Inglewood Oil Field SIMQAP Audit

The audit completed for the Inglewood Oil Field was based on the inspection and maintenance programs outlined in the SIMQAP document initiated pursuant to the CSD condition F.3.b. The audit consisted of document review, review of onsite computer equipment inspection and maintenance data bases, review of training records, staff interviews, and field inspections over the course of scheduled compliance site visits conducted by the Environmental Compliance Coordinator. Site visits to perform the SIMQAP Audit were conducted on June 7, June 28, July 2, July 18, July 26, and August 9, 2018. Follow-up reviews were done in the office while reviewing documentation provided by SPR. Specific documentation and discussion of every item reviewed under the audit is included in the attached table.

## Findings and Recommendations

### Findings

The results of the SIMQAP audit are summarized below.



a.i. Inspection of construction techniques.

No significant construction projects have occurred over the last few years and no drilling has occurred at the site since June 2014. Landscaping projects, including installation of irrigation systems, is ongoing with a target completion date of January 2019. Field review of various smaller projects included the Job Safety Analysis (JSA) document and confirmation that "tail-gate" safety meetings occurred prior to initiation of construction activities. Best Management Practices (BMPs) for storm water and sediment control were observed multiple times during site visits.

a.ii. Regular maintenance and safety inspections.

Completion of this SIMQAP audit along with the annual review of the EQAP submittals document compliance with the regular maintenance and safety inspection requirements of the SIMQAP.

a.iii. Periodic safety audits.

Completion of this SIMQAP audit fulfills the periodic safety audit requirement; additional safety audits will be scheduled in the future.

a.iv. Corrosion monitoring and leak detection.

Implementation of the inspection and monitoring program detailed in the Pipeline Integrity Manual, interviews with SPR pipeline staff, and the onsite review of those inspection records as part of the safety audit demonstrate compliance with the corrosion monitoring and leak detection requirements of the SIMQAP.

a.v. Inspection of all trucks carrying hazardous and/flammable material prior to loading.

Review of the requirements in Section 6.4 of the SIMQAP, *Inspection of Trucks Carrying Propane and NGLs*, and field interview with SPR staff confirm compliance with the SIMQAP requirements. The audit included review of the Standard Operating Procedures and Hazardous Materials Security Plan for the loading rack at the Gas Plant. The use of a Transportation Risk Management Prevention Program (TRMPP) was discussed with the Gas Plant Supervisor.

b. SIMQAP Updates.

The SIMQAP document was updated, reviewed by the County and approved as part of this audit process. The document requires updating to reflect the current operator and throughput data.

c. Worker Notification. The operator shall ensure that all persons working on the oil field comply with all provisions of the currently approved SIMQAP.

Review at the SPR offices of the computer-based training records software program and of the 2016 and 2017 training record documentation of SPR and sub-contractor staff demonstrate compliance with the SIMQAP requirements for worker notification.

d. Inspections. The SIMQAP shall provide for involvement of County staff or the environmental compliance coordinator in all inspections required by this section.

SPR provided access to the Inglewood Oil Field facility, a computer terminal to review training and inspection records, and hard copy documentation to facilitate completion of the SIMQAP audit.

No significant issues or deficiencies were noted during the audit process.

## Recommendations

Results of the audit generated the following four recommendations to facilitate future audits and improve safety and maintenance activities at the oil field.

### Audit Recommendation #1

SPR provided dedicated staff personal to assist the audit and review and the audit process was significantly more efficient than the previous audit completed in 2016. However, certain records and documentation required multiple meetings to complete the review. It is recommended that SPR train staff involved with the recordkeeping and organization of the documentation reviewed during the SIMQAP audit. Staff awareness of the review requirements will facilitate future audit reviews and make the process more efficient for both SPR staff and the agency reviewers.

### Audit Recommendation #2

The SIMQAP document should be updated to reflect the current operator and throughput data.

### Audit Recommendation #3

The signage and placards at the hazardous waste storage area are compliant with labeling requirements but should be organized or improved to provide a quick assessment of the contents of the containers to emergency responders. It is recommended that SPR review the hazardous waste storage area and organize or improve labeling of the containers to facilitate content information to staff, agency, and emergency responders.

### Audit Recommendation #4

It is recommended that SPR prepare and implement a Transportation Risk Management Prevention Program (TRMPP) for the vehicles that load and transport hazardous materials from the Gas Plant and vehicles that deliver hazardous materials to and from the oil field. A TRMPP includes audits of trucking carriers, identification of transportation routes, inspection of vehicle maintenance records, inspection of driver training programs, and enhanced documentation of loading procedures. TRMPPs provide additional safety oversight for vehicles that transport hazardous materials on public roadways.

The SIMQAP document should be revised to include the TRMPP pursuant to requirements of CSD Condition F.3.b:

*F.3.b. SIMQAP Updates. "The operator shall periodically review and revise the SIMQAP to incorporate changes in procedures, and new safety and maintenance technologies and procedures. The operator shall make such revisions at least every five years, or more frequently if the operator determines changes are necessary or if requested by the director or the fire chief."*

## Documents Reviewed

The documents and records reviewed as part of the SIMQAP audit are listed below. Note that much of the information and documentation reviewed during this audit consisted of internal SPR company operational records. Therefore, the review was conducted on-site at the Inglewood Oil Field offices and



at the Inglewood Oil Field Gas Plant Control Room. SPR provided access to the audit team to inspection and training documentation tracked on computer software, review of hard copy records and checklists, and field verification visits.

### Compliance Plans

- SIMQAP
- Emergency Response Plan
- Pipeline Integrity Manual
- Spill Prevention, Control, and Countermeasure Plan (SPCC)
- Fire Protection Plan
- Hazardous Materials (Business Plan)
- Environmental Quality Assurance Program (EQAP) annual submittals.

### Records/Checklists

- Supervisor Monthly Facility Self Inspection Maintenance
- Maximo® computer maintenance
- SCAQMD Rule 1173 inspection
- SCAQMD Rule 1148.1 well cellar inspection
- Employee and sub-contractor training
- Job Safety Analysis (JSA)
- VR compressor quarterly maintenance
- VR compressor quarterly electric maintenance
- Operator daily inspection
- Supervisor facility inspection
- ESD station checklist
- Fire extinguisher checklist
- Ladder inspection checklist
- Hazardous waste area checklist
- Gas detector calibration checklist
- Eye wash shower checklist
- Pipe inspection table
- Tank-sump-fans checklist
- Fire protection system checklist
- Oil pipe inspection table
- Pipeline and tank inspection reports
- Pressure relief valve tests
- Gas detector calibrations
- Pressure vessel checklists
- Daily gas plant checklist
- Control and alarm checklists
- Gas Plant loading rack Standard Operating Procedures.

## **Audit Tracking Table**

The table on the following pages details items reviewed or checked as part of the SIMQAP audit. As noted above, records were reviewed on site at the Inglewood Oil Field. The audit tracking table details the records, documents, plans, and permits reviewed.

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
<b>PSVs and PVSVs (Pressure Safety Valves and Pressure Vacuum Safety Valves)*</b>				
Review maintenance records				
Review test records (tested annually)	Annually	Test Records	Review records on-site	Reviewed Gas Plant and shipping pump test records for 2014, 2015, 2016, and 2017, tested by third party Thorco, no issues. Reviewed Tank Setting records for 2017, tested by third party Thorco, no issues.
Review event records as applicable (vent to atmosphere)		Event Record	Review records on-site Check on SCAQMD reporting	No releases in 2016 or 2017.
Review follow-up/maintenance to event incidents		Follow-up Document	Review on-site Check follow-up completed	None required.
Portable Gas Detectors	Monthly	Inspection/ Calibration Checklist	Review records on-site	Reviewed Quattro, Micro-5, Eagle (2), Mini RAE 3000, and Mini RAE 2000 detector calibration records dated 5/14/18. All passed 4 gas (LEL, O2, H2S, and CO) checks and 25 ppm alarm check. No issues.
Pressure Vessels	Quarterly	Inspection/ Calibration	Review records on-site	Reviewed OSHA permits (Department of Industrial Relations) permit to operate. Reviewed inspection records, inspections completed by third party Arise, no issues. Reviewed Pressure Vessel Checklist, lists include monthly PSV checks for pressure vessels and tanks/pumps, no issues. Reviewed 2018 tracking spreadsheet, no issues.
<b>Control, alarm, shutdown (pressure, flow, temperature, and level) devices*</b>				
Review device maintenance records				

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Review event records as applicable		Event Record	Review records on-site	Reviewed December 2017 Tanks, Cellars, Sumps, and Pump Check List. List documents pressure settings, High High, High Low, Low, and Low Low setting checks and measurements, no issues. Checklists are done monthly. Checks include pressure vessels, tanks, pumps, and injection pumps. Reviewed Tanks Level Alarm Checklist and December 2017 document in detail, no issues. Checklist includes High level, low level alarm tests.
Review follow-up/maintenance to event incidents		Follow-up Document	Review on-site Check follow-up completed	No vent to atmosphere events, no events required incident documentation.
Level Safety High & Level Safety Low (LSH/LSL)	Quarterly	Test Record	Review records on-site	Reviewed 2017 checklists as noted above and reviewed December 2017 in detail, no issues.
Low Temperature Separation (LTS) - Exchangers	Monthly	Test Record	Review records on-site	Reviewed 2017 checklists as noted above and reviewed December 2017 in detail, no issues.
Low Temperature Separation (LTS)- Vessels	Monthly	Test Record	Review records on-site	Reviewed 2017 checklists as noted above and reviewed December 2017 in detail, no issues.
Pressure Sensors High-Low (PSHL)	Quarterly	Test Record	Review records on-site	Reviewed 2017 checklists as noted above and reviewed December 2017 in detail, no issues.
<b>Emergency Shutdowns (ESDs)*</b>				
Review device maintenance records				
Review device test records			Review on-site	Reviewed ESD checklist record. Record documents quarterly testing of the ESD circuit system. Quarterly testing completed and documented. No issues. Annual ESD checked by July 29, 2018 So Cal Edison planned shutdown of Gas Plant, no issues or problems noted.

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Review event records as applicable			Review on-site Check follow-up completed	No emergency shut down events recorded in 2016, 2017, or 2018 to date.
Review follow-up/maintenance to event incidents			Review on-site Check follow-up completed	No follow-up actions required.
<b>Corrosion control, monitoring, and cathodic protection (facility and pipelines)</b>				
Pipeline Integrity Manual		Manual	Review Manual	Reviewed manual dated April 2017. Manual consistent with CCR Title 14, Division 2, Chapter 4, Subchapter 2, Article 3, Section 1774 administered by DOGGR. Manual details the annual visual checks and biennial hydrotest procedures.
Review corrosion coupon quarterly check documentation		Test Record	Review records on-site	Reviewed DOT Corrosion Coupon Reports. Reviewed May, April, March, and February 2018 documentation. Reports included Gas Plant, gas line, Packard oil line, water line). Reports provides MpS/Year corrosion rates, rates average .01 to .18 MPS/Year, no issues.
Review flow line maintenance program documentation		Manual	Review records on-site	See Pipeline Integrity Manual review notes above.
Review sacrificial anode inspection records		Test Records	Review records on-site	Sacrificial anodes not used on field piping.
Pipelines (Urban Gas Intake Line, Sales Discharge Line)	Quarterly	Test Records	Review records on-site	Checked Packard shipping line test records. Reviewed May 2018 pressure test in detail, no issues.
<b>NDT Inspections: Vessels, Tanks, Piping; Pipeline Surveys</b>				

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Review visual inspection documentation		CAL OSHA Pipeline Integrity Inspection Program	Review records	Reviewed Liquid Pipeline Reporting / Compliance spreadsheet which tracks 2015 to 2019 checks and associated DOGGR compliance forms. Includes leakage surveys, block valve inspections, cathodic protection report, corrosion inspections, coatings, pressure tests, and safety devices. No issues.
Review ultra-sonic testing documentation		Test Records	Review records	Reviewed tracking spreadsheet, no issues. Reviewed Total Thickness Management (TMLs) tracking spreadsheet for pipelines, no issues. Reviewed pipeline X-Ray data worksheet for pipelines, no issues. Completed detailed review of API 570 Inspection Report for line number WPLT-Upper-04-PO-2690, 4" water line from tank T-5 to Wemco Slop Oil Header, no issues.
Tank inspection records (5-year inspection interval)		Test Records	Review records	Reviewed Tank Inspection Worksheet. Worksheet documents lease, description, capacity, date of installation, date of external UT wall thickness reading, date of internal (API 653) inspection, and schedule for next inspection, no issues. Reviewed BC Settlement Tank #3 Inspection Report, no issues. Reviewed Tank T#7 Inspection Report, no issues.
Tank bottom leak detection visual check documentation		Test Records	Review records	ECC regularly inspects the tanks and tank batteries including tank bottoms for leaks and stained soil. Inspection reports have not noted any issues.
Pipelines		Pipeline Management Plan	Review plana	Reviewed Pipeline Management Plan (PMP) spreadsheet, no issues.

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
<b>Equipment Repair and Maintenance Records</b>				
Repair records				Reviewed Work Order documentation at the Gas Plant. Reviewed 7/19/18, 7/23/18, 7/24/18, 7/25/18, and 7/26/18. No issues, documentation organized and complete. Documentation includes ERP issues, hot work permits, energy isolation, confined space, and JSA (Job Safety Analysis). Discussed maintenance work order procedure and tracking system with Gas Plant Supervisor, repair activities are reviewed with staff.
Welding		Records	Review records	Reviewed 2017 Hot Work and General Work Permits, no issues.
NDTs (X-Rays, UT, MT, etc.)		Records	Review records	Reviewed records see tank and pipeline notes, no issues.
Risk based inspection program documentation		Records	Review records	See Gas Plant Work Order notes above.
Quality Assurance/Quality Control	SIMQAP	Records		SIMQAP audit documents the record reviews.
Hand and Portable Power Tools Maintenance	Monthly	Records	Review records	Reviewed monthly Hand and Power Tool Inspection worksheets and April 2018 checklist in detail, no issues.
Heaters and Exchangers	Quarterly	Records	Review records	Reviewed computer quarterly worksheets, no issues.
Machinery and Equipment Inspection	Monthly	Records	Review records	Reviewed monthly Hand and Power Tool Inspection worksheets and April 2018 checklist in detail. No issues.
Materials Handling Equipment	Monthly	Records	Review records	Reviewed monthly Supervisor Checklist, list documents equipment maintenance, leaks, and safety guards. Reviewed April 2018 list in detail. No issues.

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Materials Storage and Labeling	Monthly	Records	Review records	Reviewed monthly Supervisor Checklist, list documents storage areas, cylinder condition, crane safety, and hazardous material storage area condition and labeling. Reviewed April 2018 list in detail. No issues.
Compressors	Quarterly	Records	Review records	Reviewed computer quarterly worksheets, no issues.
Electrical - Motor Maintenance	Monthly	Records	Review records	Reviewed monthly Supervisor Checklist, list documents motor condition, GFI protection, and extension cord condition. Reviewed April 2018 list in detail. No issues.
Electrical Panel Identification	Monthly	Records	Review records	Reviewed monthly Supervisor Checklist, list documents panel identification and labeling. Reviewed April 2018 list in detail. No issues.
Pumps	Quarterly	Records	Review records	Reviewed Pump Checklist, documents suction, discharge, seal water, and vibration checks. Reviewed May 2018 in details and noted previous months checklists. No issues.
Safety Manuals/Emergency Phone #s/Required Postings	Monthly	Records	Review records	Reviewed monthly Supervisor Checklist, list documents OSHA signage, emergency phone numbers, Safety Manual, and safety signage. Reviewed April 2018 list in detail. No issues.
Satellite Accumulation Areas	Weekly	Records	Review records	Reviewed Weekly Visual Inspection of Satellite Accumulation Area checklists and December 2017 in detail. Checklist documents inspection for damage, leaks, deterioration, and corrosion. No issues.



SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Security Gate Check	Monthly	Records	Review records	Reviewed Gate Check List and Gas Monitor Checklist. List documents checks on visual inspection, gates locked, condition of fencing, open/close device functionality, and signage. Reviewed December checklist in detail. No issues.
Shutdown Valves (SDVs)- Liquid Discharge Line	Quarterly	Records	Review records	Reviewed computer quarterly worksheets, no issues.
Tanks, Cellars, Sumps and Pumps (Production Facilities)	Quarterly	Records	Review records	Reviewed computer quarterly worksheets, no issues.
Tanks, Sumps, and Cooling Fans (Gas Plant)	Quarterly	Records	Review records	Reviewed Tanks, Cellars, Sumps, and Pumps Checklist. Documents alarm settings, high, high low, high high, close, open, start, and stop alarms. Reviewed May 2018 detail and noted previous years documentation.
Vapor Recovery Compressor	Quarterly	Records	Review records	Reviewed computer quarterly worksheets, no issues.
Wakesha Power Generator	Quarterly	Records	Review records	Emergency power generator, reviewed computer quarterly worksheets, no issues.
<b>Operating Procedures Updates and Revalidations</b>				
Review applicable updates to facility and pipeline procedures	As needed	Records	Review as applicable.	No updates and no MOC analysis required in 2016 and 2017.
Review applicable updates to maintenance procedures	As needed	Records	Review as applicable.	No updates and no MOC analysis required in 2016 and 2017.
<b>Computerized maintenance management system</b>				

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Review Maximo® maintenance records		Records	Review records	SPR provided Maximo records from time SPR purchased field to date. Records document Work Order Number, work description, Asset identification, work type (preventative maintenance or corrective maintenance), status, target date, reported date, problem code. Reviewed random subset of records. No issues.
<b>Facility Documentation Review</b>				
Management Of Change (MOCs)		Records	Review records	No significant change in operations have required MOC analysis or documentation.
P&IDs		Records	Review records	No significant changes in operation have required revision to P&IDs.
Cause & Effect Charts		Records	Review records	No significant change in operations have required Cause & Effect analysis or documentation.
HAZOPS/ PHA Revalidations		Records	Review records	SPR is currently completing a HAZOPs analysis and update. Process is being conducted by SPR and third-party consultant Contek.
<b>Other Inspection Programs</b>				
SCQAMD Rule 1148.1	Quarterly	Inspection Records	Review records	Reviewed Rule 1148.1 SCAQMD inspection forms dated third quarter 2017. No issues.

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
SCQAMD Rule 1173	Quarterly	Inspection Records	Review records	Reviewed SCAQMD FIND 8/13/18. NOV P67907 issued on 6/18/18 for leak at Tank #3 at Packard Tank Battery, tank was not vapor tight. Tank was repaired the same day during the inspection and the repair was documented as in compliance by SCAQMD. Reviewed Fourth Quarter 2017 1173 documentation, no issues. Documentation includes Component Leak Report, Statistics Summary Sheet, Pump out and Repair Report, and Inspection Summary Report.
SIMQAP		SIMQAP	Review document Update every five years	Reviewed document. Original dated May 2009 and approved 4/13/11. Updated and approved June 2016, next update due June 2021. Confirmed with SPR that plan is still current with their operations. Plan requires change of Operator name update and update to production throughput data.
<b>SPCC</b>				
Version current and updated		SPCC	Review document	Reviewed plan with no comments on plan. Revised July 2016 and submitted and received by County Fire August 2016. Stamped by Professional Engineer (PE) 5/1/15.
<b>Fire Protection Plan</b>				
Review plan		FPP	Review document	No separate plan, FPP is contained in ERP.
Check plan is current and approved			Check approvals and date	No separate plan, FPP is contained in ERP.
Review updates as applicable			Review updates	No separate plan, FPP is contained in ERP.
UFC Permits, current and approved		Permits	Review	Checked LA County Fire Permits for 2018. Permits include compressed gas permit, flammable and combustible permit, hazardous

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
				materials permit, hot work welding and cutting permit, LP-gas permit, and well operating permit. No issues.
<b>Emergency Response Plan</b>				
Review plan		ERP	Review plan	Reviewed plan, no issues. ERP Drills completed in November 2017 and March 2018. ECC used plan as a participant in the March 2018 drill. Drill attendance included Culver City Fire, OSPR including two drill evaluators, CA F&WS, two contractor response companies including Patriot Services and MSRC, and a drill coach consultant. All agencies gave SPR passing grade with very high marks. All required forms were filled out.
Check plan is current and approved		ERP	Check approval dates	Updated in January 2017 with SPR approval March 2017.
Review updates as applicable		ERP	Review	ERP reviewed during March 2018 drill.
Annual CAN test			Confirm CAN test	CAN system tests on 12/15/2016 and 12/27/2017. ECC received emails and phone calls for both tests. Both tests successful.
<b>Fire Protection and Detection Systems*</b>				
Review inspection records	Review records			
Fire Pump Inspection and Test Operated	Monthly	Records	Review records	Reviewed Deluge System and Fire Water Pump test and maintenance records. Reviewed April 2018 in detail, no issues.
Fire Reels and Hose Boxes	Monthly	Records	Review records	Reviewed Fire Reels and Hose Boxes monthly Test and Maintenance Records. Reviewed April 2018 checklist in detail. No issues.

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Fire Stand Pipes Monthly	Monthly	Records	Review records	Reviewed Fire System and Miscellaneous Checklists. Reviewed December 2018 in detail. inspections include hose and nozzle and line flush checks. No issues.
First Aid and Lock-out/Tag-out Supplies	Quarterly	Records	Review records	Reviewed Vehicle First Aid, Eyewash, Fire Extinguisher Inspection Checklists. List includes extinguisher hydrotest dates, charge status, cylinder condition, and first aid supplies. December 2017 checklist reviewed in detail. No issues.
Gas Detectors Inspection and Calibration	Monthly	Records	Review records	Reviewed calibration schedule documentation at Gas Plant.
Emergency Eyewash & Safety Showers Station	Monthly	Records	Review records	Reviewed Emergency Eye Wash/Safety Showers monthly checklists. Reviewed April 2018 in detail. Checks include signage, area, nozzles, valve, adequate flow and weekly flush test. No issues.
Fire Extinguishers	Monthly	Records	Review records	Reviewed Fire Extinguisher Inspections monthly checklists and April 2018 checklist in detail. Checks include charge status, safety pin, condition of cylinder, condition of hose, signage and mount.
Fire Extinguisher Maintenance	Annually	Records	Review records	See above for Fire Extinguishers.
Fire Hydrants	Monthly	Records	Review records	Reviewed Fire Monitor and Hydrant Test and Maintenance Records. Data checked include valves, flow, piping, paint, signage, quarterly flush, and fire extinguishers. Records are kept as required, no issues.
Fire Monitors	Monthly	Records	Review records	Reviewed Fire Monitor inspection monthly checklists and April 2018 checklist in detail. Checks include nozzle, valve, water flow, and piping tests and review. No issues.

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
Personal Protective Equipment (PPE)	Monthly	Records	Review records	Reviewed Supervisor Facility monthly checklists and April 2018 checklist in detail. Checks include staff PPE usage and job specific PPE such as fall harnesses and noise protection. No issues.
<b>Facility training procedures and protocol</b>				
Review training records		Records	Review records	Reviewed Certification History Report for SPR employee’s digital documentation. Report provides name, start date of training, test, date of training, and due date of next training. No issues.
Review sub-contractor training records		Records	Review records	Reviewed CSD training for Montrose Environmental , American Landscaping staff, Forkert Engineering. No issues.
Incident/near miss program		Records	Review records	No incident/near miss incidents documented.
JSA (Job Safety Analysis)		Records	Review records	Reviewed general work permits for 2017 which include JSA documentation prior to initiation of job. No issues.
Root cause analysis		Records	Review records	No incidents required root cause analysis.
Review CSD awareness training records (Quiet Mode Drilling Plan, etc.)		Records	Review records	See above notes on training and training records.
<b>OSHA Required Training Records</b>				
Review training records		Records	Review records	Reviewed Certification History Report for SPR employee’s digital documentation. Report provides name, start date of training, test, date of training, and due date of next training. No issues, training records complete.
<b>Business Plan and Related Elements</b>				
Plan current and approved		Business Plan	Review Plan	Submitted June 20, 2017 to County Fire.
Plan reflects current use and			Review	Reviewed plan, no issues. Hazardous waste

SIMQAP Item	SIMQAP Inspection Frequency	Document	Audit Action	Completion Date Notes
location of hazardous materials				storage area inspected by ECC during regular site inspections. Inspection records note the storage area clear of debris and the secondary containment curbed area clear. Inspection records recommend improved signage and placarding to facilitate container identification during an emergency.
<b>LPG/NGL Transportation Safety</b>				
Review truck loading terminal procedures		Gas Plant SOPs	Review SOPs	Reviewed SOP and Hazardous Materials Security Plan at the Gas Plant. Noted that gas plant employee is required to supervise loading operations, the loading system is monitored with a computer control program, and area gates close off the loading area include a siren notification to keep clear. A grounding requirement is also noted on the loading checklist. Discussed the safety benefits of a Transportation Risk Management Prevention Program (TRMPP) with Gas Plant staff.
<b>Gas Detectors*</b>				
Functional check records (monthly)				Reviewed December 2017 checklist of RKI Eagle Model E086054 gas monitor. Checklist includes calibration dates, battery checks, LEL check, O2, H2S, and CO response checks. Documents in order, no issues.
Maintenance record verification (monthly)		Records	Review records	Reviewed Gas Monitor Trailer monthly check data, no issues.
Review applicable documentation		Records	Review records	Reviewed calibration schedule documentation at Gas Plant, no issues.



# Baldwin Hills Community Standards District Periodic Review II

Project Number: R2015-02225/RPPL2019005203



## Initial Draft REPORT September 2019

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## ACRONYMS

AOR	Area of Review
API	American Petroleum Institute
AQMP	Air Quality Management Plan
ASTM	American Society for Testing and Materials
Bbl	barrels
BMP	Best Management Practices
Bpd	barrels per day
BTEX	Benzene, Toluene, Ethyl Benzene, and Xylenes
CAAQS	California Ambient Air Quality Standards
Caltrans	California Department of Transportation
CAN	Community Alert Notification
CAP	Community Advisory Panel
CAP	Clean Air Plan
CARB	California Air Resources Board
CCC	California Coastal Commission
CCFD	Culver City Fire Department
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulations
CGS	California Geological Survey
CHC	Community Health Councils
CNEL	Community Noise Equivalent Level
CPUC	California Public Utilities Commission
CSD	Community Standards District
CUP	Conditional Use Permit
CWPPP	Construction Storm Water Pollution Prevention Plan
dB	decibel
dBA	decibels, A-weighted
DOGGR	Division of Oil, Gas and Geothermal Resources
DOT	U.S. Department of Transportation
DPH	Department of Public Health
DPW	Department of Public Works
DRP	Department of Regional Planning
ECC	Environmental Compliance Coordinator
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
EQAP	Environmental Quality Assurance Program

ERP	Emergency Response Plan
ESA	Endangered Species Act
ESHA	Environmentally Sensitive Habitat Areas
FEIR	Final Environmental Impact Report
GHG	greenhouse gases
GIS	Geographic Information System
H <sub>2</sub> S	Hydrogen sulfide
HAZOP	Hazards and Operability
InSAR	Satellite aperture radar
LACoFD	Los Angeles County Fire Department
LADPW	Los Angeles County Department of Public Works
Leq	equivalent noise level
MACC	Multiple Agency Coordination Committee
MATES	Multiple Air Toxics Exposure Study
Mscfd	thousand standard cubic feet per day
MTBE	methyl tert butyl ether
NFPA	National Fire Protection Agency
NGL	natural gas liquid
NOP	Notice of Preparation
NOV	Notice of Violation
NO <sub>x</sub>	Oxides of Nitrogen
NPDES	National Pollution Discharge Elimination System
OPR	Office of Planning and Research
OSC	on-scene coordinator
OSCP	Oil Spill Contingency Plan
OSPR	Office of Spill Prevention and Response
PPM	part per million
QMDP	Quiet Mode Drilling Plan
RECLAIM	Regional Clean Air Incentives Market
RWQCB	Regional Water Quality Control Board
SCAQMD	South Coast Air Quality Management District
SIMQAP	Safety, Inspection, Maintenance, and Quality Assurance Program
SPCC	Spill Prevention, Control, and Countermeasures Plan
SPR	Sentinel Peak Resources
SWPPP	Stormwater Pollution Prevention Plan
THC	total hydrocarbons
UIC	Underground Injection Control
VOC	volatile organic compounds

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## Executive Summary

The majority of the Baldwin Hills Inglewood Oil Field (Inglewood Oil Field), except for the northern-most areas of the field which are within Culver City, is in the unincorporated area of Los Angeles County. As such, the permitting and operations of that portion of the Inglewood Oil Field are under the land use authority of the Los Angeles County Department of Regional Planning (DRP). The DRP performs all land use planning functions for the unincorporated areas of Los Angeles County including the County General Plan, community plans, ordinances, and Community Standard Districts (CSD). A CSD is a supplemental district used to address special issues that are unique to certain geographic areas within the unincorporated areas of Los Angeles County.

On October 28, 2008, the Los Angeles County Board of Supervisors adopted the Baldwin Hills Community Standards District. The CSD is an amendment to the Los Angeles County Zoning Code and establishes additional development standards and operating procedures for the oil and gas production operations at the Inglewood Oil Field. The CSD provides a means for implementing enhanced regulations to address the unique compatibility concerns associated with operating an oil field amid urban development. In addition to the Los Angeles County Zoning Code and the Baldwin Hills CSD, operation of the Inglewood Oil Field is also subject to other local, State, and federal regulatory agencies including; County Public Works, County Fire Department, the South Coast Air Quality Management District, the California Department of Conservation, Division of Oil, Gas and Geothermal Resources, the California Regional Water Quality Control Board, and the California Department of Transportation.

Each provision, or permit condition, of the CSD addresses a specific potential environmental impact or administrative requirement associated with the continuing operation of the Inglewood Oil Field. Provision 22.310.070.G, *Periodic Review*, requires the County to conduct a comprehensive review of the requirements of the CSD every 5 years to determine if the provisions are adequately protecting the health, safety, and general welfare of the public. The first Periodic Review covered years 2008 through 2014 and was approved in September 2015. This report covers years 2014 through 2018 and is jointly prepared by the DRP and the consulting firm MRS Environmental and is the second analysis conducted pursuant to the Periodic Review requirement of the CSD Section 22.310.070.G.

## Periodic Review Results

As detailed in the following pages of this report, the results of this Periodic Review demonstrates that the provisions of the CSD have been effective and adequate to protect the health, safety, and general welfare of the public. The report also determined that no recommendations to change the language of the CSD are necessary at this time. The report analysis did determine areas where the implementation of a CSD provision could be improved. These recommendations are summarized in the following list.

1. Based on public input, it is recommended the operator consider the use of an alternate geotechnical engineering firm for the property damage complaint follow-up investigations. The use of an alternate firm would bring an additional team of subject matter experts to the issue (22.310.050.D).



2. Recommendation that the Operator continue the use of metal and or plastic bins and tanks consistent with current practice as the elimination of the use of below ground sumps is a significant environmental benefit (22.310.060.O).
3. Due to the fact that unannounced drills have not taken place in the past, it is recommended that efforts be made to ensure that unannounced drills take place at the oil field as allowed for by the provision of the CSD. The Department of Regional Planning may coordinate with the Fire Department to ensure that unannounced drills occur in the future (22.310.060.D).
4. Based on evidence of some incomplete complaint data, it is recommended that the operator meet with staff involved with the complaint process and the 1-800 telephone line vendor to review the required information necessary for filing a complete complaint. Better complaint documentation will improve the quality of the data collected for a complaint, assist in investigation of the complaint, and therefore upgrade the complaint process and data base (22.310.070.G).
5. To improve the communication of oil field activities to the public outlined in CSD Provisions 22.310.100, Public Outreach, it is recommended that the operator post updates of oil field incidents on the oil field website.

Through the provisions of the CSD, and along with the oversight of local and State agencies, DRP staff will continue to monitor the operations at the Inglewood Oil Field to protect the health, safety, and general welfare of the public and the environment. More information on the Inglewood Oil Field is located on the DRP CSD and the Sentinel Peak Resources (SPR) (operator of the oil field) websites:

- <http://planning.lacounty.gov/baldwinhills>
- <http://www.inglewoodoilfield.com>

## **1.0 Introduction**

On October 28, 2008, the Los Angeles County Board of Supervisors adopted the Baldwin Hills Community Standards District (CSD). The CSD is an amendment to the Los Angeles County Zoning Code and establishes additional development standards and operating procedures for the oil and gas production operations at the Inglewood Oil Field. Provision G.7, *Periodic Review*, requires the County to conduct a comprehensive review of the requirements of the CSD every five years after the effective date of the ordinance to determine if the provisions are adequately protecting the health, safety, and general welfare of the public. The initial Periodic Review process was initiated in mid-2013, covered the compliance period from the inception of the CSD through December 2013, and was finalized September 2015. This September 2019 report is the second analysis conducted pursuant to the Periodic Review requirement of the CSD. This review was initiated in October 2018 and covers the compliance period for the calendar years 2014 through 2018.

### **1.1 CALIFORNIA DEPARTMENT OF CONSERVATION**

The California Department of Conservation, Division of Oil, Gas and Geothermal Resources (DOGGR) oversees the drilling, operation, maintenance, and plugging and abandonment of oil, natural gas, and geothermal wells. DOGGR has jurisdictional authority to regulate all well downhole activities including well stimulation techniques. As such, the County, the CSD, and DOGGR work together to regulate and oversee the operations of the Inglewood Oil Field. The CSD provisions reference DOGGR regulations and authority where applicable.

### **1.2 INGLEWOOD OIL FIELD BACKGROUND**

The Inglewood Oil Field has been in operation for over 85 years with over 1,600 wells being drilled during that time throughout the historical boundaries of the oil field. Current activities at the Inglewood Oil Field involve extracting oil and gas from subsurface reservoirs located between 500 and 10,000 feet deep, processing the crude oil to remove water and processing the gas to remove hydrogen sulfide and gas liquids. Crude oil is then shipped by pipeline to area refineries to be processed into gasoline and other products. The gas is shipped by pipeline to The Gas Company for end use by consumers and industry or is shipped to area refineries for use in the refining processes. Processing activities at the Inglewood Oil Field include, but are not limited to, the following:

- Gross Fluid Production Gathering and Testing;
- Crude Oil Handling;
- Water Processing;
- Water Injection;
- Gas Gathering/Gas Processing;
- Well Drilling, Maintenance and Workovers; and
- Ancillary Systems.

The average production volumes from the Inglewood field for the years 2014 through 2018 are listed in the table below.

Year	Barrels Oil Per Day (BOPD)	Gas - Thousand Standard Cubic Feet per Day (MSCFD)	Barrels Water Per Day (BWPD)
2014	7,298	3,484	349,088
2015	6,512	2,919	339,608
2016	5,702	2,606	330,433
2017	5,567	2,510	337,547
2018	5,463	2,497	351,802

Note: One barrel = 42 gallons.

The current operator of the oil field is Sentinel Peak Resources (SPR), a Quantum Energy Partners portfolio company. SPR’s oil and gas operations are located throughout central and southern California, with corporate headquarters located in Englewood, Colorado. SPR took over operations of the Inglewood Oil Field beginning January 1, 2017 from the previous operator Freeport-McMoRan Oil & Gas (FM O&G).

### 1.3 BALDWIN HILLS COMMUNITY STANDARD DISTRICT

The CSD established new development standards and operating procedures for the oil and gas production operations at the Inglewood Oil Field. The ordinance, number 2008-0057, amended Title 22 Planning and Zoning Code of the County of Los Angeles with the intent to implement regulations, safeguards, and controls for the oil and gas production activities of the Inglewood Oil Field. Further, the supplemental zoning regulations are intended to ensure that oil field operations are compatible with surrounding land uses, to minimize potential adverse impacts, and to enhance appearance of the site with landscaping and other property maintenance requirements. The boundaries of the CSD are shown on Figure 1.1.

#### Title 22 Zoning Code Update

The Department of Regional Planning completed a technical update to Title 22: Zoning Code to reorganize, clarify, and simplify Title 22. The new ordinance became effective on February 28, 2019. The Baldwin Hills CSD remained intact, but the regulation numbering was changed to reflect the update. The Baldwin Hills CSD is found in Chapter 22.310 of the revised ordinance and is organized as follows:

Title 22 Chapter 22.310 Baldwin Hills Community Standards District  
(Previous CSD Title 22.144.22 Ordinance References in Parentheses)

- Section**
- 22.310.010. Purpose (A)
- 22.310.020 Definitions (C)
- 22.310.030 District Map (B)
- 22.310.040 Area Specific Development Standards (D)
  - A. Operational Limits (D.1)
- 22.310.050 Oil Field Development Standards (E)
  - A. Fire Protection and Emergency Response (E.1)
  - B. Air Quality and Public Health(E.2)
  - C. Safety and Risk of Upset (E.3)
  - D. Geotechnical (E.4)
  - E. Noise Attenuation (E.5)
  - F. Vibration Reduction (E.6)
  - G. Biological Resources (E.7)
  - H. Cultural / Historical Resources (E.8)

- Section**
- I. *Lighting (E.9)*
  - J. *Landscaping, Visual Screening, Irrigation and Maintenance (E.10)*
  - K. *Oil Field Waste Removal (E.11)*
  - L. *Construction of Private Roads (E.12)*
  - M. *Signs (E.13)*
  - N. *Painting (E.14)*
  - O. *Sumps (E.15)*
  - P. *Well Cellars (E.16)*
  - Q. *Stormwater Drainage Management (E.17)*
  - R. *Water Management Plan (E.18)*
  - S. *Groundwater Monitoring (E.19)*
  - T. *Fencing (E.20)*
  - U. *Oil Field Cleanup and Maintenance (E.21)*
  - V. *Security (E.22)*
  - 22.310.050 W. *Vehicle Parking (E.23)*
  - X. *Sanitation (E.24)*
  - Y. *Storage of Hazardous Materials (E.25)*
  - Z. *Drilling, Redrilling, and Reworking Operations (E.26)*
  - AA. *Processing Operations (E.27)*
  - BB. *Well Reworking Operations (E.28)*
  - CC. *Tanks (E.29)*
  - DD. *Well Production and Reporting (E.30)*
  - EE. *Idle Well Testing and Maintenance (E.31)*
  - FF. *Abandoned Well Testing (E.32)*
  - GG. *Well and Well Pad Abandonment (E.33)*
  - HH. *County Request for Review of Well Status (E.34)*
  - II. *Reduced Throughput Triggering Review (E.35)*
  - JJ. *Abandonment Procedures (E.36)*
  - 22.310.060 *Monitoring and Compliance*
    - A. *Environmental Quality Assurance Program (EQAP)(F.1)*
    - B. *Environmental Compliance Coordinator (ECC) (F.2)*
    - C. *Safety, Inspection, Maintenance and Quality Assurance Program (SIMQAP) (F.3)*
    - D. *Annual Emergency Response Drills of LA County and Culver City Fire Departments (F.4)*
    - E. *Noise Monitoring F.5)*
    - F. *Vibration Monitoring (F.6)*
    - G. *Complaints (F.7)*
  - 22.310.070 *Administrative Items (G)*
    - A. *Costs of Implementing Monitoring and Enforcing Conditions (G.1)*
    - B. *Draw Down Account (G.2)*
    - C. *Indemnification (G.3)*
    - D. *Insurance Requirements (G.4)*
    - E. *Performance Security (G.5)*
    - F. *Other Obligations (G.6)*
    - G. *Periodic Review (G.7)*
    - H. *Multiple Agency Coordination Committee (MACC) (G.8)*
    - I. *Related County Code Provision (G.9)*
  - 22.310.080 *Permitting (H)*
    - A. *Ministerial Site Plan Review Required (H.1)*
    - B. *Conditional Use Permit (CUP) Required (H.2)*
    - C. *Conditional Use Permit (CUP) Requirements (H.3)*
    - D. *Application Where Violation Exists (H.4)*
  - 22.310.090 *Enforcement (I)*
    - A. *Civil Penalties and Performance Security*

**Section**

- B. Access to Records and Facilities*
- C. Right of Entry*
- 22.310.100 *Public Outreach (J)*
  - A. Community Advisory Panel (CAP) (J.1)*
  - B. Community Relations (J.2)*
  - C. Ombudsperson (J.3)*
- 22.310.110 *Modification of Development Standards (K)*
- 22.310.120 *Implementation Provisions (L)*



Baldwin Hills Community Standards District (CSD)



Figure 1.1  
Baldwin Hills  
Community  
Standards  
District (CSD)  
Boundary Map

#### **1.4 CSD PERIODIC REVIEW (22.310.070 G) PROVISION**

Provision 22.310.070.G of the CSD reads as follows:

**22.310.070 G. Periodic Review.** *The county shall conduct a comprehensive review of the provisions of this section at least every five years to determine if the provisions of this section are adequately protecting the health, safety, and general welfare. Such reviews shall, among other things, consider whether additional provisions should be added, appended, or removed. One of the main goals of the Periodic Review shall be to evaluate if proven technological advances that would further reduce impacts of oil operations on neighboring land uses should be incorporated into the provisions of this section.*

*1. Review Requirements. Each review shall include a report by a hearing officer designated by the director, which shall be prepared after public notice and an opportunity for public comment. The report shall include a comprehensive analysis of the effectiveness of this section, and shall review and consider enforcement activity, operational records, and any other issues relating to oil operations. The report, at the option of the county, may include a survey of residents near the oil field regarding noise, odors, vibrations, and other issues requested by the director of public health. A draft of the report shall be provided to the CAP and the operator for review and comment. All comments on the draft report from the CAP and the operator shall be submitted to the hearing officer in writing, and will be considered, if timely received, before the report is finalized. The final report by the hearing officer shall include a recommendation as to whether the director should prepare proposed amendment to this section for submission to the board of supervisors.*

*2. Early Reviews. At the discretion of the director, reviews of this section may be conducted more frequently than every five years. Without limiting such discretion, the director shall consider whether an early review should be undertaken if more than three material violations occur within any 12-month period.*

*3. Initial Review. The initial review shall occur no sooner than three years and no later than five years after the effective date of the ordinance establishing this section unless the director determines that such initial annual review shall occur at an earlier time pursuant to subsection b, above.*

#### **1.5 ORIGIN OF THE PERIODIC REVIEW**

This review is the second comprehensive review of the CSD provisions as required by Provision 22.310.070 G. As outlined in the provision above, the requirement identifies the timeline for the Periodic Review process as at least five years after the adoption of the CSD and at earlier intervals, if deemed necessary by the County. As noted above, the initial Periodic Review process covered the first five compliance years of the CSD through December 2013 and this review covers the second five-year period from January 2014 through December 2018. There have been no significant non-compliance issues at the Inglewood Oil Field since the provisions of the CSD have been implemented through December 2018. In addition, the County continuously monitors compliance with the CSD through the Environmental Quality Assurance Program. The County has not required the initiation of a Periodic Review of the CSD prior to the five-year schedule requirement.

## 1.6 PERIODIC REVIEW METHODOLOGY

The Periodic Review process was initiated during a Community Advisory Panel (CAP) meeting on October 25, 2018 with a presentation by the County a CAP meeting on January 24, 2019. The CAP was established to foster communication between the community, the County, and the oil field operator (SPR) regarding oil field operations (see discussion for Provision 22.310.100 A for more detail on the CAP). The January 2019 presentation provided an overview of the Periodic Review provision of the CSD and solicited public input on the effectiveness of the CSD for input to the Periodic Review. The County received comments on the Periodic Review at CAP meetings and emails with the comment period ending May 31, 2019. All input was considered in the preparation of the Periodic Review public draft document.

The analysis reviewed a variety of compliance records and plans to determine the effectiveness of the CSD for protecting the health, safety, and general welfare of the public including:

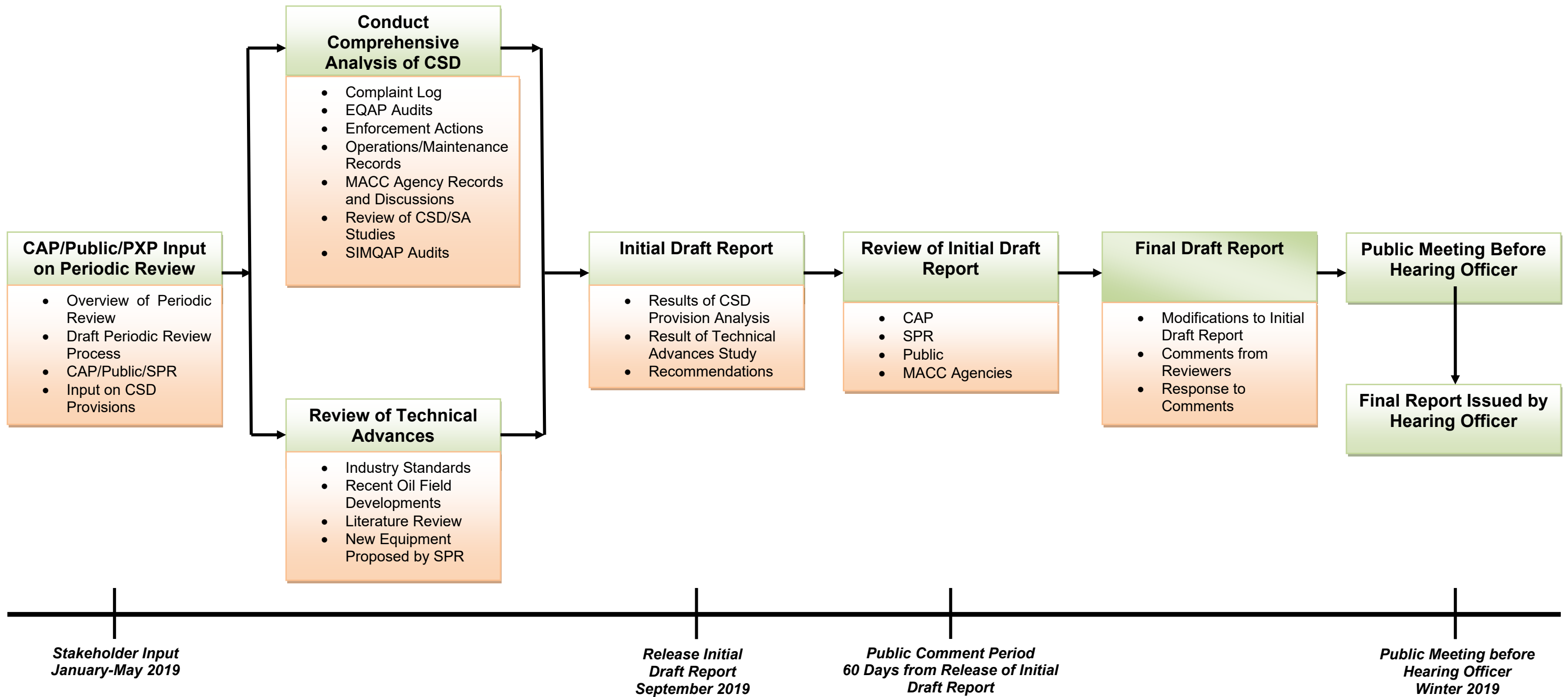
- Compliance plans
- Compliance records
- Operations and maintenance records
- Results of the Environmental Quality Assurance Program (EQAP) and EQAP Audit
- Multi Agency Coordination Committee (MACC) records
- Violations or enforcement actions
- Incident reports
- CSD administrative requirements
- Regulatory permits activity
- Technological advancements in the operation of oil fields

The draft Periodic Review document was released and distributed to the CAP, MACC, the public and the oil field operator for review and comment in September 2019. Appendix A summarizes the scoping comments and provides responses. Figure 1.2, Periodic Review Flowchart, presents a timeline of the steps taken in preparation of the Periodic Review document.



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**Figure 1.2  
Baldwin Hills CSD  
Periodic Review Flowchart**



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## 1.7 PERIODIC REVIEW REPORT FORMAT

This report provides a review of the effectiveness and adequacy of the provisions of the CSD to protect the health, safety, and general welfare of the public. The analysis also determines compliance of the oil field with the operational limits, development standards, monitoring, administrative, and permitting requirements of the CSD. Sections 4.0 through 11.0 provide detail on the implementation of each CSD provision and a determination as to whether the requirements have worked as intended.

The review for the development standards contained in CSD Sections 22.310.040 through 22.310.100 are organized as follows:

- Provision Language
- Summary of Complaints
- Summary of Issues Raised by the Public
- Analysis of Compliance and Effectiveness
- New Technology
- Recommendations to Changes in Implementation
- Recommendations to Changes in CSD Language

The Summary of Complaints section discusses whether complaints have been made by the public on the subject CSD provision through the complaint procedure pursuant to Provision 22.310.060 G., *Complaints*. Input from the public outside of the complaint process is discussed in the Summary of Issues Raised by the Public section. This section provides an overview of input received by the County during Community Advisory Panel (CAP) meetings, from the results of email and letter input solicited for comment on the Periodic Review, and from the public concerns that led to the additional requirements stipulated in the lawsuit Settlement Agreement and Mutual Release agreement dated July 15, 2011; a brief overview of the settlement agreement is included in Section 3.0.

The Analysis of Compliance and Effectiveness section provides detail on the implementation of the condition and a determination as to whether the requirements have worked as intended. The applicability of potential new technologies that may improve and or lessen the environmental impact of oil field operations is noted in the New Technology section. Finally, recommendations to changes in the implementation or language of the provision are discussed in the last two sections of the review.

CSD Sections 22.310.090, *Enforcement* and 22.310.110, *Modification of Development Standards*, have not been implemented through the end of 2018. As such, the analysis for these two subsections is a brief summary of the intent of the provision. Section 22.310.120, *Implementation Provisions*, provides a schedule for completion of many of the compliance plans and action item requirements of the CSD upon the original approval; those milestones have been completed by the oil field operator. The discussion of Section 22.310.120 is therefore provided in a tabular format providing the completion date of each requirement.

## 1.8 SUMMARY OF RECOMMENDATIONS

This Periodic Review has resulted in several recommendations to enhance the implementation of the provisions of the CSD. These recommendations do not require a modification or change to the language of the CSD ordinance; rather, the recommendations are improvements in the method of implementation or compliance effort of the subject provision as summarized in the table below.

<b>CSD Provision</b>	<b>Summary of Recommendation</b>
22.310.050.D	Based on public input, it is recommended the operator consider the use of an alternate geotechnical engineering firm for the property damage complaint follow-up investigations. The use of an alternate firm would bring an additional team of subject matter experts to the issue.
22.310.050.O	Recommendation that the Operator continue the use of metal and or plastic bins and tanks consistent with current practice as the elimination of the use of below ground sumps is a significant environmental benefit.
22.310.060.D	Due to the fact that unannounced drills have not taken place in the past, it is recommended that efforts be made to ensure that unannounced drills take place at the oil field as allowed for by the provision of the CSD. The Department of Regional Planning may coordinate with the Fire Department to ensure that unannounced drills occur in the future.
22.310.070.G	Based on evidence of some incomplete complaint data, it is recommended that the operator meet with staff involved with the complaint process and the 1-800 telephone line vendor to review the required information necessary for filing a complete complaint. Better complaint documentation will improve the quality of the data collected for a complaint, assist in investigation of the complaint, and therefore upgrade the complaint process and data base.
22.310.100	To improve the communication of oil field activities to the public it is recommended that the operator post updates of oil field incidents on the oil field website.

## 2.0 Summary of Previous Environmental Reviews

Prior environmental reviews on the Inglewood Oil Field with a nexus to the provisions of the CSD include the *Final Environmental Impact Report, Baldwin Hills Community Standards District, October 2008*, the *Settlement Agreement and Mutual Release, July 15, 2011*, the *Annual Well Increase Evaluation*, December 2011, and the initial *Periodic Review Report, September 2015*. In addition, Stipulation 8 of the Settlement Agreement required a supplemental air quality monitoring study which was initiated (Baldwin Hills Air Quality Study) in June 2012 with the final report dated February 2015.

### 2.1 BALDWIN HILLS CSD FEIR

The *Final Environmental Impact Report, Baldwin Hills Community Standards District, October 2008* (FEIR) is the environmental document that was prepared under the California Environmental Quality Act (CEQA). The FEIR was used to provide information to the general public and by Los Angeles County as one element in the decision-making process for adoption of the CSD for the Inglewood Oil Field. The provisions and requirements of the CSD were developed in part from the mitigation measures identified in the FEIR. The FEIR is available on the Los Angeles County Department of Regional Planning web site.

### 2.2 SETTLEMENT AGREEMENT

In November 2008 the adequacy of the CSD measures in protecting human health and the environment and the FEIR were legally challenged. The litigation was brought by the following petitioners representing the public and public groups; Community Health Councils, Inc., Natural Resources Defense Council, Mark Salkin, the City of Culver City, Citizens Coalition for a Safe Community and the Concerned Citizens of South-Central Los Angeles. The result of this legal action was the *Settlement Agreement and Mutual Release, July 15, 2011* as negotiated by the various parties, Los Angeles County and Plains Exploration and Production Company (PXP), the operator of the oil field at the time. The Settlement Agreement contains additional or revised requirements on: slant drilling, noise, the number of drill rigs, the number of wells, a health assessment and environmental justice study, a clean technology assessment, an electrical distribution study, supplemental air quality monitoring, flaring stipulations, well plug dimensions, landscaping requirements, oil field cleanup plan, a hydraulic fracturing study, and revised review based on reduced production.

The additional or revised requirements are discussed where applicable in the following analysis of the CSD provisions sections of this document and the *Settlement Agreement and Mutual Release* document is attached as Appendix B. Stipulation 5 of the Settlement Agreement, the *Health Assessment and Environmental Justice Study*, required a study in addition to the updated health risk assessment condition of CSD Provision 22.310.050 B.11. The study followed a report completed by the County Department of Public Health dated February 2011. The February 2011 Study analyzed the mortality rates, low birth rate births, birth defects, and cancer rates of the communities surrounding the Inglewood Oil Field as compared to Los Angeles County as a whole. The report was followed with an updated report, dated May 22, 2012, as required by the Settlement Agreement, based on community input, a community survey, and additional data obtained from drilling activities at the oil field. A second health study is currently under preparation by Public Health with the assistance of a Health Working Group composed of members of the public and the CSD Community Advisory Panel (CAP).

## 2.3 ANNUAL WELL INCREASE EVALUATION

Provision 4.b of the Settlement Agreement allows for a modification to the number of wells drilled in a calendar year. For the modification to be approved, the County must evaluate whether the CSD has been effective in protecting the health, safety, and general welfare of the public. This analysis, the *Annual Well Increase Evaluation*, was completed in December 2011 and included a review of the following CSD compliance subject areas; noise, vibration, air emissions, odors, ground movement, visual and aesthetics, hazards, fire protection and emergency response, and ground water quality. The results of the review concluded that for these areas of review, the CSD has been effective in protecting the health, safety, and general welfare of the public. Additional detail on the report is provided in the following applicable analysis of the CSD provision sections of this document; the *Annual Well Increase Evaluation* is included as Appendix C.

## 2.4 BALDWIN HILLS AIR QUALITY STUDY

Stipulation 8, *Air Quality Monitoring*, of the Settlement Agreement required a supplemental air quality monitoring study to address stakeholder concerns on potential acute and chronic exposure to air contaminants from the Inglewood Oil Field. Sonoma Technology Inc. was selected by the County to perform the Air Quality Study (Study) which commenced June 2012 consistent with the Settlement Agreement deadline of July 15, 2012. The monitoring was conducted between November 2012 and November 2013, and the report was finalized in February 2015.

The primary focus of the Study was to quantify the air toxic emissions from the Inglewood Oil Field operations and assess the health risk of both acute and chronic exposure to the emissions of oil field operations. The Study also estimated other area sources of toxic emissions and, to the extent feasible, assessed the contribution of the oil field to the overall health risk in the areas surrounding the oil field.



The Study reviewed 37 air toxics emitted by Inglewood Oil Field operations and conducted a hazard prioritization analysis to identify the pollutants of greatest concern to be analyzed in the Study. The following pollutants were identified as pollutants of potential concern; diesel particulate matter (DPM), cadmium, benzene, nickel, formaldehyde, mercury, manganese, acrolein, arsenic, and lead. Four monitoring stations were set up along the perimeter of the oil field in approximate north, south, east, and west locations. The Study was conducted for one year for DPM and, due to the availability and expense of the monitoring devices, 2.5 months for the other pollutants.

Results of the air monitoring data were used to calculate the health risk of acute and chronic exposure to the air toxics emitted from oil field operations. The health risk estimates were completed pursuant to the risk assessment guidelines outlined by the California EPA Office of Environmental Health Hazard Assessment (OEHHA) following the same methodology as used in the SCAQMD Multiple Air Toxic Exposure Study (MATES) studies. The MATES study is a monitoring and evaluation study conducted in the South Coast Air Basin; the study included a monitoring program, an updated emissions inventory of toxic air contaminants, and a modeling

effort to characterize risk across the Basin. The study focuses on the carcinogenic risk from exposure to air toxics. The fourth such study, MATES IV, was completed with the final report dated May 1, 2015. SCAQMD has initiated a fifth effort, MATES V, which includes a fixed site monitoring program with ten stations, an updated emissions inventory of toxic air contaminants, and an updated risk assessment.

The Baldwin Hills Air Quality Study determined the primary toxic pollutant associated with excess cancer risk to be DPM; the determination is consistent with the MATES IV study results. The results for excess cancer risk attributed to Inglewood Oil Field operations ranged from less than 1 per million to the west and south of the oil field to 6.7 per million on the east side of the oil field. Total excess cancer risk from all area sources plus the oil field was estimated at 340 per million, with vehicle exhaust the primary cause. Therefore, results of the Study indicate the Inglewood Oil Field contribution to the total area excess cancer risk is less than 2% of the total. Results of the MATES IV determined an average excess cancer risk value for the Los Angeles Basin at 418 per million. Both the MATES IV study and the Baldwin Hills Air Study determined that the primary cancer risk in the area is attributable to vehicle diesel exhaust (DPM), a determination further evidenced by the fact that the highest cancer risk areas identified in the MATES IV study were near the Port of Long Beach, the Port of LA, and along transportation corridors. Results for non-cancer chronic hazard potential and acute exposure values from oil field operations were both below 1.0, the health reference level where no adverse human health effects would occur.

**2.5 INITIAL PERIODIC REVIEW**

The first Periodic Review resulted in several recommendations to enhance the implementation of the provisions of the CSD. The recommendations did not require a modification or change to the language of the CSD ordinance; rather, the recommendations detailed improvements in the method of implementation or compliance effort of the subject CSD provision. The recommendations and status are summarized in the table below. The CSD provision citation used prior to the February 2019 ordinance update is included in *parentheses* as that was the regulation reference used in the first Periodic Review.

CSD Provision	Summary of Recommendation	Status
22.310.050 A.1 (E.1.a)	In response to requests made by the public, it is recommended that the annual Community Alert Notification (CAN) tests include interested residents.	The operator has included all interested CAP members in the annual tests performed. It is noted that at least one community member appears to not be receiving the annual notifications. It is recommended that the operator continue to work with all interested community members to be included on the notification list.
22.310.050 J (E.10)	Recommendation that FM O&G (now SPR) schedule installation of the remaining landscaping phases to achieve the landscaping required by this provision in a timely manner.	All landscaping was completed in December 2018.
22.310.050 O.1 (E.15.a)	Recommendation that the Operator continue the use of metal and or plastic bins and tanks consistent with current practice as the elimination of the use of below ground sumps is a significant	The operator has continued the use of this practice as confirmed by the County Environmental Compliance Coordinator (ECC).



Baldwin Hills Community Standards District (CSD)

<b>CSD Provision</b>	<b>Summary of Recommendation</b>	<b>Status</b>
	environmental benefit.	
22.310.050 S (E.19)	Based on comments by the RWQCB regarding potential additional monitoring locations, it is recommended that the Operator coordinate with the RWQCB and install additional groundwater monitoring wells if deemed necessary.	SPR received updated RWQCB permit in February 2018, no additional monitoring wells are required.
22.310.050 T (E.20)	Due to un-authorized access through damaged fencing, it is recommended the ECC and the Operator increase monitoring of the condition of the perimeter fencing and conduct any necessary repairs as soon as possible.	The ECC and the Operator have increased monitoring of the facility perimeter fencing. Recent ECC inspections have not noted any fence issues.
22.310.050 Z.3.j (E.26.c.x)	In consideration of the usefulness and substantial costs associated with the preparation of the topographic vertical profiles, it is recommended considering removing the subject figures/maps from the Annual Drilling Plan until the information is deemed useful for inclusion in future plans.	The subject graphics are not included in the annual drilling plan submittals.
22.310.050 BB.2 (E.28.b)	It is recommended that the Operator facilitate better coordination when scheduling reworking and the other types of rigs at the oil field to avoid concentrating too many rigs in one area.	The ECC has not noted over concentration of rigs in one area during recent inspections. The County has not received any recent complaints on the subject.
22.310.060 C (F.3)	A comprehensive SIMQAP audit has not been conducted to date. It is recommended that a SIMQAP audit be conducted over the next year in coordination with the EQAP audit and that appropriate interested regulatory agencies be noticed of the audit for participation as applicable.	Two SIMQAP audits have been completed to date with reports dated July 2016 and August 2018.
22.310.060 D (F.4)	Due to the fact that unannounced drills have not taken place in the past, it is recommended that efforts be made to ensure that unannounced drills take place at the oil field as allowed for by the provision of the CSD. The Department of Regional Planning will coordinate with the Fire Department to ensure that unannounced drills occur in the future.	Up to the discretion of the Fire Department. No unannounced drills have occurred to date.
22.310.100 A.1 (J.1.a)	In response to requests by the public to update CAP membership, allow new members to fill vacant panel seats and replace absentee members, the DRP Director will review CAP membership and determine how to proceed under the existing provision of the CSD.	The Director of Regional Planning notified the public of three vacant seats on the CAP on June 13, 2017. Currently two of the three CAP vacancies have been filled.
22.310.100 B.1 (J.2.a)	In response to public input on the 2013 Community Meeting, it is recommended that agendas for future Community Meetings be specific to oil field operations and issues and that measures be implemented to ensure questions from the public are addressed appropriately.	The Community Meetings held in 2014 through 2018 have been specific to oil field operations. The 2018 meeting was held at the oil field and was well attended.

### **3.0 Area Specific Development Standards (22.310.040)**

CSD Section 22.310.040 contains a single requirement which limits the areas for drilling and operations.

#### **3.1 A. OPERATIONAL LIMITS**

*No surface drilling or other surface oil operations shall be allowed within the portions of the district consisting of the Southern California Edison facility, the Holy Cross Cemetery, and the small non-contiguous parcel located east of La Brea Avenue.*

##### **Summary of Complaints:**

The County has not received any complaints regarding the operational limits provision of the CSD.

##### **Summary of Issues Raised by the Public:**

In the past, the public has expressed concern at the Community Advisory Panel (CAP) meetings about the potential, due to slant drilling technology, for the oil field operator to drill outside the boundaries of the CSD. The concern was not specific to the operational limits provided by this provision but rather the potential for well bottom hole locations to be under a residence and thus outside the CSD boundary. The County and the oil field operator have confirmed that no surface or bottom hole well locations have been drilled outside the DOGGR established boundaries of the CSD/Inglewood Oil Field. Down-hole operations are regulated by DOGGR.

##### **Analysis of Compliance and Effectiveness:**

As noted above, no surface or bottom hole well locations have been drilled outside the boundaries of the Inglewood Oil Field. In addition, no surface drilling operations have been conducted within the areas consisting of the Southern California Edison facility, the Holy Cross Cemetery, or the small non-contiguous parcel located east of La Brea Avenue. All new drill sites are subject to review and approval by the County pursuant to Provision 22.310.050 Z, the *Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan* and this provision prevents approval of surface hole locations in those subject areas.

The provision is considered fully effective at this time and no further analysis is recommended.

##### **New Technology:**

This provision prevents drilling from occurring in certain geographic areas, thus a discussion on new technology is not applicable.

##### **Recommendations to Changes in Implementation:**

The provision has been implemented and is considered fully effective at this time, no changes to implementation are recommended.

##### **Recommendations to Changes in CSD Language:**

The provision is fully effective at this time, no recommendations to the CSD language are recommended.

## **4.0 Oil Field Development Standards (22.310.050)**

Section E provides the development standard requirements of the CSD.

### **4.1 A. FIRE PROTECTION AND RESPONSE**

*The operator shall comply with the following provisions:*

*1. Community Alert Notification System ("CAN"). The operator shall maintain and test on an annual basis a CAN for automatic notification of area residences and businesses in the event of an emergency arising at the oil field that could require residents or inhabitants to take shelter, evacuate, or take other protective actions.*

*2. Spill Containment Response Training. The operator shall conduct annual spill containment response training and shall at all times have available, on-site, sufficient and properly maintained equipment and/or facilities so that a spill of the entire contents from the largest oil tank on the oil field can be responded to and contained in a timely manner to reduce the likelihood that the spill reaches a catch basin.*

*3. Emergency Response Plan ("ERP"). The operator shall at all times maintain and fully implement and comply with all provisions of an emergency response Plan and shall further ensure that the then current ERP satisfies all rules and regulations of the United States Environmental Protection Agency and California Code of Regulations relating to emergency action plans and spill prevention control and countermeasure plans, as well as the rules, regulations, and requirements of the California Office of Spill Prevention and Response. The ERP shall also satisfy the rules and regulations of the United States Department of Transportation relating to onshore pipeline spills.*

#### **Summary of Complaints:**

No complaints regarding the annual operation testing of the CAN system have been received by the County and the CAN system has not been utilized for an emergency at the Inglewood Oil Field to date. Spill containment response training is conducted annually onsite and no complaints have been received by the County regarding the training. County has not received any complaints regarding the ERP.

#### **Summary of Issues Raised by the Public:**

The CAN system has been discussed at CAP meetings noting that the annual system tests did not include residents that have requested to be on the test notification list. SPR has updated the test notification list and all interested residents will be included in the 2019 test. Additional input was received regarding the public notification after the tank overflow incident on November 22, 2018 resulted in odors in the Ladera Heights community, see discussion for 22.310.050 C and CC for discussion of the release. Input from the public and in scoping comments for this review noted that the CAN system should have been used for that incident and potentially for other odor compliant incidents. However, the CAN system is not activated by the operator alone and requires the input from the applicable Fire Department, the agency that makes the ultimate decision on notification to residents. With respect to the odor incident on November 22, 2018, the incident was reported and responded to by Cal-OES, DOGGR, and local CUPA/Fire Departments. None of these agencies required activation of the CAN system.

Input was also received during the scoping of this document requesting that the CSD require neighborhood or community health and safety/evacuation plans in addition to the ERP. Evacuation plans and the safety of the public is under the jurisdiction of first responder agencies such as local Fire Departments, law enforcement, and other emergency response agencies such as the County Office of Emergency Management and the Culver City Fire Department Emergency Services. These agencies have their own plans/protocols and operate under an Incident Command System (ICS), which is a standardized approach to the command, control, and coordination of emergency response agencies for an effective response from multiple agencies. As such, the implementation of an additional emergency plan for the public from the operator is not appropriate and could conflict with the agencies responsible for the safety of the public. As noted below, local first response agencies attend the annual oil field spill drills and are therefore familiar with the ERP and practice the coordination and implementation of the plan on an annual basis.

No issues on the spill containment response training or the ERP have been raised by the public to date.

**Analysis of Compliance and Effectiveness:**

A CAN system is a system that allows for an emergency alert, message, or notification to people located within a specific area. The oil field CAN system is designed to provide such notification to area residents and businesses of an emergency that would require one to take shelter, evacuate or take other protective actions. The *PXP 2009 Community Alert Notification (CAN) System* was approved by the Los Angeles County Fire Department (County Fire Department) on February 18, 2010. The reverse dialing system provided by the vendor *CodeRED* was installed on September 16, 2010. The system has been successfully tested each year since installation with test dates over the last five years occurring on December 22, 2014, December 10, 2015, December 15, 2016, December 27, 2017, and December 5, 2018. The CAN test connects to a subset of the notification list made up of local agency and Fire Department contacts; the general public is not contacted during the test to avoid the potential for unnecessary alarm. The *PXP 2009 Community Alert Notification (CAN) System Plan* is available at [www.inglewoodoilfield.com](http://www.inglewoodoilfield.com).

Annual spill containment response training for the years 2014 to 2018 was completed by the operator on October 3, 2014, November 5, 2015, November 3, 2016, June 29, 2017, and March 14, 2018. As documented in the *PXP 2009 Tank Leak Detection and Containment at Inglewood Oil Field* report, approved in May 2009, all tanks have secondary containment consisting of a wall, berm, or combination of the two types. The report also concluded that all tank secondary containment structures comply with California Division of Oil, Gas and Geothermal Resources (DOGGR) requirements and that the volume of the available secondary containment can contain volumes in excess of the full volume of each tank.

The *Spill Prevention, Control and Countermeasure Plan (SPCCP)*, required under CSD Provision 22.310.050.Q.2, provides detail on the maintenance of tank and related equipment at the oil field which include inspection programs, corrosion prevention/corrosion monitoring techniques, and clean up equipment. The Plan, current version dated July 2018, also includes potential spill scenarios for each tank with containment calculations documenting the adequacy of the containment structures. Review and use of this Plan is a component of the annual spill containment response exercise.

The ERP, current version dated June 2019, is submitted to the following agencies: DOGGR, California Department of Fish and Wildlife Office of Spill Prevention and Response (OSPR),

U.S. Environmental Protection Agency Region 9, California State Lands Commission Marine Facilities Division Planning Branch, and the U.S. Department of Transportation Office of Pipeline Safety. Specific response considerations for biological resources were added to the ERP in March 2010 per CSD Provision 22.310.050.G.1.

The ERP is utilized in annual emergency response drills as required by CSD Provision 22.310.060.D. The annual drills may be attended by County and Culver City Fire Departments. CSD Provision 22.310.060.D requires that the drills demonstrate the adequacy of the ERP. As noted above, emergency response/spill drills were conducted annually by the operator on October 3, 2014, November 5, 2015, November 3, 2016, June 29, 2017, and March 14, 2018.

This provision of the CSD is considered fully effective at this time, no further modifications in implementation or language are recommended.

**New Technology:**

The CAN system was recently upgraded to include notifications via cellular phones and email in addition to the original land line-based system; this represents a significant improvement in the ability of the system to contact the public that could potentially be affected by an emergency at the oil field.

The SPCCP is reviewed, evaluated, and updated as necessary every five years as required by Section 1.5 of the Plan. A component of the evaluation includes review of the applicability of new prevention and control technology which may significantly reduce the likelihood of a spill event. The annual spill response training also allows for new technology to be reviewed and implemented as applicable.

The annual emergency response drills and updates to the ERP document allow for new technology and techniques to be introduced and included as they become available.

**Recommendations to Changes in Implementation:**

The CAN, spill containment response training and ERP have been fully implemented and are tested each year, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The existing CSD language requires annual updating and testing of the fire protection and response provisions, thus no changes in CSD language are needed or recommended at this time.

**4.2 B. AIR QUALITY AND PUBLIC HEALTH**

*The operator shall at all times conduct oil operations to prevent the unauthorized release, escape, or emission of dangerous, hazardous, harmful and/or noxious gases, vapors, odors, or substances, and shall comply with the following provisions:*

*1. Emission Offsets. The operator shall obtain emission offsets or RECLAIM credits as defined and required by SCAQMD Regulations for all new or modified emission sources that require a new or modified SCAQMD permit.*

2. *New Gas Plant.* No new gas plant or flare shall be installed at any steam drive plant that may be constructed on the oil field. The operator shall connect any such steam drive plant to the existing gas plant to eliminate the need for a new gas plant or flare at the steam drive plant.

3. *Odor Minimization.* At all times the operator shall comply with the provisions of an odor minimization Plan that has been approved by the director. The odor minimization Plan shall include any measures requested by the director. The Plan shall provide detailed information about the facility and shall address all issues relating to odors from oil operations. Matters addressed within the Plan shall include setbacks, signs with contact information, logs of odor complaints, method of controlling odors such as flaring and odor suppressants, and the protocol for handling odor complaints. The odor minimization Plan shall be reviewed by the operator on an annual basis to determine if modifications to the Plan are required. Any modifications to the odor minimization Plan shall be submitted to the director for review and approval.

4. *Air Monitoring Plan.* At all times the operator shall comply with the provisions of an air monitoring Plan that has been approved by the director. The air monitoring Plan shall include any measure requested by the director. During drilling, redrilling, and reworking operations, the operator shall monitor for hydrogen sulfide and total hydrocarbon vapors as specified in the approved Plan. Total hydrocarbon vapors shall be monitored at the gas plant as specified in the approved Plan. Such monitors shall provide automatic alarms that are triggered by the detection of hydrogen sulfide or total hydrocarbon vapors. For drilling, redrilling, or reworking monitors, the alarms shall be audible and/or visible to the person operating the drilling, redrilling, or reworking equipment. For the gas plant monitors, the alarms shall be audible or visible to the gas plant operator. Actions to be taken shall be as follows when specified alarm levels are reached:

a. At a hydrogen sulfide concentration of equal to or greater than five parts per million but less than 10 parts per million, the operator shall immediately investigate the source of the hydrogen sulfide emissions and take prompt corrective action to eliminate the source. The corrective action taken shall be documented in the drilling, redrilling, or reworking log. If the concentration is not reduced to less than five parts per million within four hours of the first occurrence of such concentration, the operator shall shut down the drilling, redrilling, or reworking operations in a safe and controlled manner, until the source of the hydrogen sulfide emissions has been eliminated, unless shutdown creates a health and safety hazard.

b. At a hydrogen sulfide concentration equal to or greater than 10 parts per million, the operator shall promptly shut down the drilling, redrilling, or reworking operations in a safe and controlled manner until the source of the hydrogen sulfide emissions has been eliminated, unless shutdown creates a health and safety hazard. The corrective action taken shall be documented in the drilling, redrilling, or reworking log. When an alarm is received, the operator shall promptly notify the county fire department - Health Hazardous Materials Division, the Culver City Fire Department, the Office of Emergency Services, and the SCAQMD.

c. At a total hydrocarbon concentration equal to or greater than 500 parts per million but less than 1,000 parts per million, the operator shall immediately investigate the source of the hydrocarbon emissions and take prompt corrective action to eliminate the source. The corrective action taken shall be documented in the drilling log for drilling, redrilling, or reworking and in the gas plant log for the gas plant. If the concentration is not reduced to less than 500 parts per million within four hours of the first occurrence of

*such concentration, the operator shall shut down the drilling, redrilling, reworking, or gas plant operations in a safe and controlled manner, until the source of the hydrocarbon emissions has been eliminated, unless shutdown creates a health and safety hazard.*

*d. At a total hydrocarbon concentration equal to or greater than 1,000 parts per million, the operator shall promptly shut down the drilling, redrilling, or reworking or gas plant operations in a safe and controlled manner, until the source of the hydrocarbon emissions has been eliminated, unless shutdown creates a health and safety hazard. The corrective action taken shall be documented in the drilling log for drilling, redrilling, or reworking and in the gas plant log for the gas plant. When an alarm is received, the operator shall promptly notify the county fire department - Health Hazardous Materials Division, the Culver City Fire Department, and the SCAQMD.*

*e. All the monitoring equipment shall keep a record of the levels of total hydrocarbons and hydrogen sulfide detected at each of the monitors, which shall be retained for at least five years. The operator shall, on a quarterly basis, provide a summary of all monitoring events where the hydrogen sulfide concentration was at five parts per million or higher and the total hydrocarbon concentration was at 500 parts per million or higher to the fire chief. At the request of the fire chief, the operator shall make available the retained records from the monitoring equipment.*

*5. Portable Flare for Drilling. The operator shall have a gas buster and a portable flare, approved by the SCAQMD, at the oil field and available for immediate use to remove any gas encountered during drilling operations from drilling muds prior to the muds being sent to the shaker table, and to direct such gas to the portable flare for combustion. The portable flare shall record the volume of gas that is burned in the flare. The volume of gas burned in the flare shall be documented in the drilling log. The operator shall notify the fire chief and the SCAQMD within 48 hours in the event a measurable amount of gas is burned by the flare and shall specify the volume of gas that was burned in the flare. No drilling or redrilling shall be conducted in areas that are known to penetrate the Nodular Shale zone unless a fully operational and properly maintained gas buster and portable flare are installed on the rig. All other drilling and redrilling operations shall be conducted so that any measurable gas that is encountered can, and will, be retained in the wellbore until the gas buster and portable flare are installed on the rig, after which the gas will be run through the system. The operator shall immediately notify the fire chief and the SCAQMD in the event any gas from drilling or redrilling operations is released into the atmosphere without being directed to and burned in the flare.*

*6. Oil Tank Pressure Monitoring and Venting. All oil tanks that contain or could contain oil shall have a fully operational pressure monitoring system that continuously measures and digitally records the pressure in the vapor space of each tank. The detection system shall notify the operator via an alarm when the pressure in the tank gets within 10 percent of the tank relief pressure. In the event of an alarm, the operator shall immediately take corrective action to reduce the tank pressure. The corrective action shall be documented in the operator's log. The operator shall notify the fire chief and the SCAQMD within 24 hours if the pressure in any tank covered by this subsection ever exceeds such tank's relief pressure. Within seven calendar days after any tank vapor release, the operator shall report the incident to the SCAQMD as a breakdown event pursuant to Rule 430, and shall provide the fire chief with a written report of the event and the corrective measures undertaken and to be undertaken to avoid future oil tank vapor releases. The operator shall make any changes to such report that may be required to obtain approval from the fire chief and the SCAQMD and shall promptly institute all corrective measures called for by the report.*

7. *Odor Suppressant for Bioremediation Farms.* When loading material or tilling material at the bioremediation farms, the operator shall use an odor suppressant such that no odor from the bioremediation farms can be detected at the outer boundary line.

8. *Odor Suppressant for Drilling and Redrilling Operations.* The operator shall use an odor suppressant spray system on the mud shaker tables for all drilling and redrilling operations to ensure that no odors from said operations can be detected at the outer boundary line.

9. *Closed Systems.* The operator shall ensure all produced water and oil associated with production, processing, and storage, except those used for sampling only, are contained within closed systems at all times.

10. *Meteorological Station.* The operator shall maintain and operate a meteorological station at the oil field in good operating condition and in compliance with all applicable Environmental Protection Agency ("EPA") and SCAQMD rules, regulations, and guidelines, and to the satisfaction of the director. The operator shall conduct an audit of the meteorological station on an annual basis and submit the results of the audit to the SCAQMD and the director. The operator shall maintain the data files for the meteorological station for a period of not less than 10 years. All such data shall be available upon request to the SCAQMD and the director.

11. *Updated Health Risk Assessment.* After every five years of operation of the meteorological station, the operator shall provide the previous five years of metrological data to the SCAQMD and the director. If the SCAQMD or the director determines that the previous five years of metrological data from the oil field could result in significant changes to the health risk assessment that was conducted as part of the Baldwin Hills Community Standards District Environmental Impact Report, then the county may elect to re-run the health risk assessment using the previous five years of metrological data from the metrological station.

12. *Off-Road Diesel Construction Equipment Engines.* All offroad diesel construction equipment shall comply with the following provisions:

a. Utilize California Air Resources Board ("CARB") EPA Certification Tier III or better certified engines or other methods approved by the CARB as meeting or exceeding the Tier III standard or Tier II certified engines as long as no drilling or redrilling occurs during construction.

b. Utilize a CARB Verified Level 3 diesel catalyst. The catalyst shall be capable of achieving an 85 percent reduction for diesel particulate matter. Copies of the CARB verification shall be provided to the director. Said catalysts shall be properly maintained and operational at all times when the off-road diesel construction equipment is in use.

13. *Drill Rig Engines.* All drilling, redrilling, and reworking rig diesel engines shall comply with the following provisions:

a. Utilize CARB/EPA Certification Tier II or better certified engines, or other methods approved by CARB as meeting or exceeding the Tier II standard.

b. Utilize second generation heavy duty diesel catalysts capable of achieving 90 percent reductions for hydrocarbons and for particulate matter smaller than 10 microns. Said



*catalysts shall be properly maintained and operational at all times when the diesel engines are running.*

*14. Drilling and Redrilling Setbacks. The following setbacks shall apply within the oil field for drilling or redrilling:*

- a. At least 400 feet from developed areas.*
- b. At least 20 feet from any public roadway.*

*15. Construction Schedule. To reduce construction air emissions, no overlap shall be permitted in major facility construction and installation activities such as the steam drive plant, the water processing facility, or the oil cleaning plant.*

*16. Fugitive Dust Control Plan. The operator shall comply with the provisions of a fugitive dust control Plan that has been approved by the director. The Plan shall be based upon the requirements of SCAQMD Rule 403 and the SCAQMD CEQA Guideline Fugitive Dust Control Measures. The fugitive dust control Plan shall be reviewed by the operator every five years to determine if modifications to the Plan are required. Any modifications to the fugitive dust control Plan shall be submitted to the director for review and approval. The fugitive dust control Plan shall include any measured requested by the director.*

**Summary of Complaints:**

The County has logged 104 odor complaints and 4 dust complaints from the public on oil field operations for the years 2014 through 2018. Determining the source of an odor is an extremely difficult task due to the transient nature of an odor itself and the myriad of potential odor sources both from the oil field and the urbanized areas surrounding the oil field. As such, the source for most of the complaints associated with odors was not able to be unequivocally identified in follow up investigations as documented in the table below. Sources of odor in addition to the oil field have been identified as dead animals, skunks, So Cal Gas operations, area sewers, and home improvement projects such as roofing. Air quality monitoring data, the wind speed and direction from the onsite meteorological monitoring station, field visits, and assistance from SCAQMD staff have been used to investigate odor complaints. As discussed below, the oil field air monitoring equipment has not detected an exceedance of the pollutant criteria stipulated in subsection 22.310.050.B.4.a through 22.310.050.B.4.d nor has any elevated data been correlated with the time and day of any of the odor complaints.

<b>Odor Complaints with Source Determination</b>	
<b>Number of Complaints</b>	<b>Cause</b>
14	November 22, 2018 Tank Overflow
3	Sewer System
3	Southern Cal Gas Odorant System
2	Skunk
1	Non-Oil Field Roofing Project
81	Unknown
<b>Total</b>	<b>104</b>

One of the four complaints for dust were associated with very high wind events where the onsite meteorological station measured wind speeds above 30 mph.

**Summary of Issues Raised by the Public:**

Input on air quality issues was received in the scoping comments for this document and can be grouped into the following two categories; requests for updated air quality and toxic air quality studies including the use of the forthcoming SNAPS and Department of Public Health (DPH) Health Assessment reports and climate change/GHG emissions. Several commenters provided a list of reports on other oil fields for input into the Periodic Review, however, studies on other oil wells, oil fields and other areas are not relevant to the Inglewood Oil Field and are outside the scope of the Periodic Review. Oil fields have different characteristics depending on what reservoirs are targeted and what method of extraction is being used. In addition, different regulations and requirements may be in place to mitigate potential impacts of oil and gas production for any given oil field. Oil or gas fields where fracking is occurring in different areas with different regulations and different geology are not applicable to the Inglewood Oil Field. It should be noted here that the Periodic Review is a review of the provisions of the CSD and the potential impacts of the Inglewood Oil Field, therefore, reports on different operations without the regulations and mitigations found in the CSD are not applicable to this analysis. Both the SNAPS and DPH Health Assessment Projects have not been completed, thus, use of those studies is not possible in this review. The County is looking forward to the results of the SNAPS monitoring effort and will consider the results in future reviews.

The Settlement Agreement required supplemental air quality monitoring to assess the risk of both acute and chronic exposure to air contaminants from oil field operations. The monitoring study included sampling and analysis for air toxics including diesel particulate matter, gaseous volatile organic compounds (VOCs), and trace metals. Four monitoring sites were identified and used at the perimeter of the oil field corresponding to locations to the north, south, east, and west of the facility. The monitoring equipment was housed in a trailer with meteorological instrumentation located on a 10-meter tower to collect study site specific wind speed, wind direction and temperature data. The study took place from November 2012 to November 2013, a time period when significant drilling activity was occurring, no drilling has taken place at the oil field since June 2014. The air monitoring study was completed in the fall of 2013; the final report was released in February 2015.

The Settlement Agreement also contains a requirement regarding operation of the gas plant back up flare. The stipulation allows for the operation of only one gas plant flare at any given time and requires the installation of the new flare be completed within 180 days of receipt of the SCAQMD permit for the flare. The Operator does not operate the gas plant flares simultaneously; the installation of the new flare was completed in 2012.

Climate change, sea level rise and other associated issues are beyond the scope of the Periodic Review analysis. The CSD does not have a requirement specific to GHG emissions as the SCAQMD and the County did not have significance thresholds for that pollutant at the time of adoption of the CSD. As GHG emissions are under the jurisdiction of CARB and the SCAQMD, the County currently uses the SCAQMD threshold to determine the significance of a project's GHG emissions impact. Current GHG emissions at the IOF are under the SCAQMD's 10,000 metric ton CO<sub>2</sub> equivalent per year threshold for industrial facilities as documented on Annual Emissions Reports (AERs) submitted to SCAQMD. This is primarily due to the fact that the oil field is powered by electricity and all oil field pumps at the IOF are electric. Sources of air emissions, and thus GHGs, at the oil field include heaters and treaters and other equipment at the gas plant, fugitive emissions, the maintenance rigs, and other mobile sources. Total GHG emissions for these sources are less than the SCAQMD GHG threshold, therefore, the Inglewood Oil Field is not a significant source of GHG emissions and further mitigation, or analysis is not required.

On the evening of November 22, 2018, a tank at the Inglewood Tank Battery overflowed due to the failure of a level controller. A level controller is a device that, when working properly, can control the operation of one or more pumps that move fluid through a tank or system of tanks. In this case, the controller failed, and a pump was not activated resulting in an overflow of produced water into the secondary containment area of the tank battery. Approximately 630 gallons (15 barrels) of oil/water mixture was spilled over a 15 to 20-minute time frame into the secondary containment area. Odors from the spill were noted by residents living to the east of the oil field in the Ladera Heights neighborhood with fourteen odor complaints filed on the Inglewood Oil Field complaint system. Follow up investigation into the incident by the County included an engineering analysis with the Canary® Model, an application-specific hazard model for vapor dispersion, fire radiation, and vapor cloud explosions. Results of the analysis showed short term health effects from benzene and odor impacts approximately eight times the odor threshold in the Ladera Heights neighborhood. The analysis report was discussed at the Community Advisory Panel (CAP) meeting on April 25, 2019 and is available on the County DRP Baldwin Hills website. Additional investigation into the tank level controller device is discussed in CSD 22.310.050.CC.

**Analysis of Compliance and Effectiveness:**

Subsection 22.310.050.B.1 requires the operator of the oil field to obtain emission offsets or RECLAIM credits for all new or modified emission sources requiring a SCAQMD permit. No activities or emission sources requiring SCAQMD oversight required emission offsets or the purchase of RECLAIM credits during this review period 2014 through 2018. The requirements listed under 22.310.050.B.2 have also not been implemented to date because a new gas plant or new steam drive plant has not been proposed or installed.

The Odor Minimization Plan was submitted on February 25, 2009 and revised and approved on April 15, 2010. The Plan describes the four main sources of potential odors at the oil field as fugitive emissions from equipment, operation of the bioremediation farms, drilling muds, and accidental release from drilling activities. The Plan identified the use of suppressants for odor minimization at the bioremediation farms and for drilling muds and the use of a portable flare/gas buster for drilling operations. The Plan is reviewed by the operator and the County annually and has not been required to be updated to date. The use of closed systems for all equipment associated with produced water and oil, consistent with provision 22.310.050.B.9, is described for odor minimization from fugitive emissions.

Operation of the bio farms has not occurred during this 2014 to 2018 review period. During drilling activity, the drilling muds and cuttings are sprayed with suppressants as they pass through the “mud shakers” via overhead misters connected to a drum of liquid suppressant. A portable flare/gas buster, as required by provision 22.310.050.B.5, is available for use at drilling and redrilling sites for potential odors from drilling operations. These odor minimization measures are inspected for operation to document compliance during the periodic inspections completed by the County Environmental Compliance Coordinator (ECC). It should be noted here that no drilling has occurred at the oil field since June 2014.

The Air Monitoring Plan was submitted on February 29, 2009, revised in November and December of 2009 and approved by the County on January 4, 2010. The Plan is reviewed by the operator and the County annually and has not been required to be updated to date. The Plan presents information on meteorological conditions at the oil field, air contaminants associated with oil and gas operations, air monitoring instrumentation and procedure requirements, and Air Monitoring Plan training for oil field personnel. Portable air monitoring

trailers with Total Hydrocarbon (THC) and Hydrogen Sulfide (H<sub>2</sub>S) monitors that meet the specifications outlined in the Plan are employed at drilling and redrilling sites. The drilling site monitor data is recorded on a data logger which is downloaded and transferred to the oil field air monitoring data base at the end of each drilling project. The portable monitoring system includes an alarm system with both visual and auditory capabilities; the sound alarm is turned off at night pursuant to the requirements of the Quiet Mode Drilling Plan (QMDP).



Air monitoring at the gas plant consists of THC sensors located at each of the four corners of the gas plant facility footprint. The sensors are connected to the gas plant computer Supervisory Control and Data Acquisition (SCADA) system which provides for real time data access by gas plant personnel and alarm capability. The SCADA system logs the monitoring data for later download to the oil field air quality monitoring database. The sensors are calibrated monthly with the calibration documents reviewed during the periodic inspections completed by the ECC. In addition, the ECC conducts independent monitoring for emissions and odors with the use of a portable gas monitor during each site inspection.

The CSD does not require an annual compliance report for the air quality monitoring data, however, the data must be available to the County for review upon request. Air monitoring results along with the monitoring sensor calibration data are reviewed by the County ECC periodically during site visits and at the annual Environmental Quality Assurance Program (EQAP) audit. To date, no exceedance of the air monitoring criteria specified in subsections 22.310.050.B.4.a through d has been measured at the oil field and thus the drilling or gas plant corrective actions required by these subsections have not been necessary to implement.

The portable flare for drilling required by subsection 22.310.050.B.5 was custom built by PXP, a former operator of the oil field. The flare system was reviewed, approved, and permitted by the SCAQMD and meets the requirement for recording the volume of gas burned. The oil field has SCAQMD permits for two of these portable flare systems. Current operating procedure at the oil field calls for the flare to be installed at every drilling and re-drilling operation whereas subsection 22.310.050.B.5 requires that only drilling activity in the Nodular Shale zone require the installation of the flare system or if gas in the well bore is encountered. As noted above, no gas has been flared through the portable gas flare system to date.

All tanks that contain oil and/or produced water are connected to the oil field operational pressure monitoring system as required by subsections 22.310.050.B.6 and 9. The system is connected to the SCADA system and is monitored by gas plant personnel. The tanks and associated valves, pipeline flanges, and pressure relief systems are subject to SCAQMD permit requirements and the associated fugitive emissions program. The fugitive emissions program requires quarterly inspections of oil field equipment for fugitive emissions with the use of a portable handheld organic vapor analyzer. The results of these inspections are submitted to the SCAQMD. The oil field uses a third-party consultant specializing in air quality monitoring for the fugitive emissions inspection program. The SCAQMD audits the results of the fugitive inspection monitoring program by performing an annual inspection of the subject oil field equipment. The tanks and associated equipment are also subject to the breakdown provisions of AQMD Rule 430. Failure of the pressure monitoring system requires notification and calculation of any air emissions associated with the breakdown. Two were filed for this review

period, the first in April 2016 for a broken tank hatch connector due to high winds and the second in November 2018 for the level controller failure incident discussed above.

As discussed above regarding the Odor Minimization Plan, odor suppressants are used at the bioremediation farms (when in operation) and for drilling and redrilling operations as required by subsections 22.310.050.B.7 and 8. Odor suppressant at the bioremediation farms is applied manually with a sprinkler system when odors are detected during loading, pre-tilling and tilling operations. The odor suppressant system for the drill rig is a custom-made mister system where the suppressant is pumped from a drum source up to tubing installed across the top of the mud shaker. Sprinkler type misters are installed in the tubing every few feet and spray the odorant downward over the mud and drill cuttings material. Periodic inspections by the County ECC, including monitoring for odors with the use of a portable gas monitor during each site inspection, document the installation and operation of these odor suppressant systems.



The meteorological monitoring system required by subsection 22.310.050.B.10 was approved by the SCAQMD in July 2009, installed and tested in December 2009, and was operational on January 21, 2010. Monitoring data is collected on a data logger which is downloaded monthly to the oil field air monitoring data base. Some data collected during the December 2016 through March 2017 was lost due to data logger download issues. The County researched the data download problems and recommended an alternate approach to both the data download and calibration procedures for the meteorological station. Those changes have been implemented and a new data logger is scheduled for installation in the Fall of 2019. The meteorological instrumentation is calibrated annually by instrumentation vendor technicians. The annual Data Validation Reports are posted on the oil field website at [www.inglewoodoilfield.com](http://www.inglewoodoilfield.com). Operation of the meteorological station is checked by the ECC during periodic site inspections and the annual Data Validation Report is reviewed during the EQAP audit.

The updated Health Risk Assessment required by subsection 22.310.050.B.11 has not been required to date. The required 5 years of onsite meteorological data was collected in January 2015 and the data was reviewed and found to be consistent with the data used for the analysis in the Baldwin Hills Environmental Impact Report (EIR). Therefore, the County determined an updated Health Risk Assessment was not required. Subsections 22.310.050.B.12 and 13 require that engines associated with off road diesel construction equipment and drill rig engines, respectively, meet California Air Resources Board (CARB) emission reduction requirements. Subsection 22.310.050.B.14 provides setbacks for drilling or redrilling sites. Review and approval of the *Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan* confirms compliance with these provisions where engine certification documents are checked, and drilling locations are reviewed for compliance with setback requirements. Subsection 22.310.050.B.15 construction schedule limitations for major facility construction, has not been implemented to date because no major construction projects have been proposed or constructed to date.

Pursuant to Provision 22.310.050.B.13, CARB/EPA Certification Tier II or better certified engines and heavy-duty diesel catalysts are required for all drilling, re-drilling, and reworking rig diesel engines. All rigs operated at the Inglewood Oil Field meet the CARB/EPA Tier III engine standards.

The Fugitive Dust Control Plan was submitted on March 26, 2009 and revised and approved in April 2010. The Plan describes potential dust generating activities associated with oil field operations and outlines dust control measures to minimize offsite dust. Some of the primary dust control measures included in the Plan are limiting oil field vehicle speeds to 15 mph, the use of water trucks on unpaved roads, limiting vehicle travel on unpaved roads and parking surfaces, and the use of tarps or soil stabilizers to prevent dust from soil stockpiles. Other dust control measures include procedures for loading and unloading material from trucks, pipe track out grid devices to knock mud from vehicles leaving the oil field, and minimizing dust generating activities during high wind speed times. As noted above, one of the four dust complaints was associated with a day with wind speeds in excess of 30 mph.

The air quality and public health requirements of this provision have been implemented and are ongoing. This condition is considered fully effective at this time, no further evaluation is recommended.

**New Technology:**

New emission sources at the oil field require permitting by the SCAQMD and may require offsets or RECLAIM credits. The compliance plans for odor minimization, air monitoring, meteorological monitoring, and fugitive dust are required to be updated periodically or as required by the County. Closed monitoring systems and oil field engines are subject to SCAQMD or CARB rules, respectively. The oil field drill rigs are subject to CARB diesel exhaust reducing programs, those programs include the exhaust emission standards program that require engine replacement and/or installation of emission control devices on diesel engines. For example, CARB Rule 2449 requires that the diesel engines in the oil field rigs meet specific emissions limitations for pollutants such as NO<sub>x</sub> and diesel particulate matter (DPM). The allowable emissions requirements decrease each year through the year 2023, providing a significant annual decrease in air pollutants from oil well drilling, re-working and maintenance activities associated with the operation of the rigs.

Therefore, technical improvements that provide cleaner burning drill rig engines are currently required at the oil field through the year 2023 as part of the SCAQMD regulatory framework. In addition, as new technology is developed in air quality monitoring, emission controls, or oil field equipment that can lower the air quality impact of oil field operations, that technology can be implemented by this provision by reference.

**Recommendations to Changes in Implementation:**

This requirement has been implemented and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

#### **4.3 C. SAFETY AND RISK OF UPSET**

*The operator shall at all times conduct oil operations in a manner that minimizes risk of accidents and the release of hazardous materials, and shall comply with the following provisions:*

*1. Natural Gas Liquid Blending. Natural gas liquids at the gas plant shall be blended with the oil to the maximum allowable pipeline system vapor pressure. Natural gas liquids storage shall be limited to the volume allowed in the risk management Plan approved by the fire department.*

*2. Propane and Natural Gas Liquids Bullet Fire-Proofing. The operator shall install and maintain fire-proofing insulation on all propane and natural gas liquids bullets within the oil field. The fire-proofing insulation shall have a minimum two-hour fire rating and otherwise be acceptable to the fire chief. All propane and natural gas liquid bullets shall be equipped with an automatic deluge system.*

*3. Steam Drive Plant Setback. The steam drive plant, if constructed, shall be located at least 1,000 feet from a developed area and shall use urea or equivalent, low toxicity material for any nitrogen oxide emission reduction that is required by the SCAQMD.*

*4. Secondary Containment for Oil. The operator shall comply with the following provisions:*

*a. The operator shall ensure that all existing oil tank areas in the oil field, unless determined by the director to be infeasible, and all the new oil tank areas shall have secondary containment (berms and/or walls) that can contain at least 110 percent of the largest oil tank volume to reduce the likelihood of oil spills entering the retention basins. In the event the director determines that it would be infeasible to provide 110 percent containment for a particular existing oil tank, the operator shall provide such containment as the director determines is feasible.*

*b. All retention basins in the oil field shall be adequately sized, and maintained to handle a 100-year storm event plus a potential spill of the volume of the largest tank that would drain into each basin.*

*c. All above ground piping in the oil field that contains or could contain oil shall be protected by basins or secondary containment measures (berms and/or walls).*

#### **Summary of Complaints:**

The County has not received any public input on the natural gas liquid blending or the fire proofing of the propane and natural gas liquid bullets requirements to date. A steam drive plant has not been constructed to date and no public input has been received by the County. No complaints regarding secondary containment for oil have been received by the County.

#### **Summary of Issues Raised by the Public:**

Provisions 22.310.050.C.1 through 3 are operational requirements developed from the EIR to minimize potential impacts to public safety from the operation of the gas plant, the propane storage and loading facilities, and a potential new steam drive plant. The County has not received any public input on natural gas blending or the propane and natural gas liquid fireproofing; a new steam drive plant has not been constructed or proposed to date.

**Analysis of Compliance and Effectiveness:**

SPR blends the natural gas liquids (NGLs) to the maximum allowable pipeline system vapor pressure as required by the subject CSD provision requirement and for economic reasons. Blending of NGLs can provide several main benefits when added to crude oil; the NGLs can decrease the viscosity and improve the API gravity value of the oil and reduce offsite transportation costs. Current production and operation of the oil field allow for all NGL produced to be blended with the oil and transported off site with the crude oil via pipeline. The storage of the NGL tank is in compliance with the criteria in the Risk Management Plan.

The propane and natural gas liquids bullet fire proofing was completed on February 23, 2009 with the associated documentation submitted to the LA County Fire Department on February 25, 2009. The approved fire proofing system has a two-hour fire rating and is equipped with an automatic deluge system. With this fireproofing and deluge system the potential for a propane or natural gas fire at the bullets has been substantially reduced. The *PXP 2009 Third Party Audit of Fire Protection Capabilities at Inglewood Oil Field* report analyzed the oilfield's fire protection capabilities for compliance with National Fire Protection Agency (NFPA) Requirements, the County Fire Code, County Fire Department Regulations, California Code of Regulations, and American Petroleum Institute (API) Standards and Recommended Practices. The report, completed in March 2009, determined that all the tanks, vessels, and other equipment associated with fire potential were in compliance with all referenced codes and requirements and the report further documented the oil field is in compliance with industry best practices for similar facilities.

The *Annual Well Increase Evaluation, December 2011*, included a review of the fire proofing and automatic deluge systems. The report concluded that the potential for a propane or natural gas fire at the bullet storage area has been substantially reduced. The report also concluded that the secondary containment and retention basin systems, discussed in more detail below, are adequately sized for both a worst-case spill and a 100-year storm event.

A steam drive plant has not been constructed to date. An analysis of the location and emission reduction equipment will be completed by the DRP and SCAQMD during the processing of the project application if such a new plant is proposed. SPR does not currently Plan to construct a new steam drive plant.

As documented in the *PXP 2009 Tank Leak Detection and Containment at Inglewood Oil Field* report, approved in May 2009, all tanks have secondary containment consisting of a wall, berm, or combination of the two types. The report also concluded that all tank secondary containment structures comply with DOGGR requirements and that the volume of the available secondary containment is capable of containing volumes in excess of the full volume of each tank.

The oil field contains six retention basins; Dabney Lloyd, Vickers 2 Upper, Vickers 2 Lower, Vickers 1, Stocker, and LAI Last Chance. If these basins discharge, they discharge directly or indirectly to the Los Angeles Department of Public Works (LADPW) storm drains. During the dry season, the basins are maintained to be free of debris and are periodically inspected by the County ECC. The basins have two stage outlet control features consisting of outlet orifices and dual water and oil weir systems to prevent oil from reaching the storm drain system. The *PXP Retention Basin Study*, completed in March 2009 and revised in September 2009 and January 2010, analyzed and modeled the capacities of the basins along with a 100-year storm event. The study concluded that the onsite basins have the capability to handle a 100-year storm event without flooding per the CSD requirement. The study further determined that in the event of an oil tank failure during a 100-year storm event, the basin weir system would prevent oil from



going offsite. The County Public Works Department has reviewed and approved the retention basin capacities.

Most of the above ground piping throughout the oil field is not protected by individual pipeline specific secondary containment or basin structures; however, the oil field retention basin system is designed to prevent any fluid from the above ground piping from traveling offsite. Although outside this review period and the CSD boundary, it should be noted that, on April 1, 2019, oil from a leaking pipe was able to flow offsite and into the Culver City storm drain system. Investigation of the path of the oil flow from the leaking pipe indicated a breach in the earthen berm system of the well pad area near the leak. The cause of the damaged berm was determined to be erosion from recent rain fall and damage by service vehicles. As a result of the offsite consequence of the spill, the operator has added a formal inspection protocol of areas to inspect the integrity of the berms necessary to ensure storm water and any other fluid is routed to the oil field retention basin system. The County, through routine inspections completed by the Environmental Compliance Coordinator, is also reviewing the containment berms on a regular basis.

The mitigations for safety and risk of upset required by this provision have been implemented and are considered fully effective at this time, no further analysis is recommended.

**New Technology:**

Blending of NGLs with oil is standard industry best practice and the transportation of NGL by pipeline significantly reduces the risk to public safety when compared to other modes of transportation such as truck or rail.

As noted above, the propane and natural gas liquids bullets are subject to regulatory agency codes and requirements, therefore, new or modified equipment will be updated as required by future changes to those codes and requirements. New technologies associated with the operation of a steam drive plant will be reviewed by the DRP, SCAQMD, and other interested agencies during review of a project application should a new plant be proposed.

The facility oil tank secondary containment and retention basin systems are sufficient to handle a worst-case oil spill along with a 100-year storm event. As applicable plans such as the ERP and SPCCP are periodically updated and through the annual EQAP audit process, new technologies for the prevention and control of potential leaks or spills are reviewed and can be implemented as applicable, without the need to modify the CSD.

**Recommendations to Changes in Implementation:**

The requirements for safety and risk of upset to minimize risk of accidents and the release of hazardous materials of this provision have been implemented, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The provision is considered fully effective at this time and no changes to the CSD language are recommended.

#### **4.4 D. GEOTECHNICAL**

*The operator shall comply with the following provisions:*

*1. Grading. The operator shall comply with all of the following provisions:*

*a. All proposed grading shall be subject to prior review and approval by the director of public works.*

*2. Grading involving up to 5,000 cubic yards and grading associated with the bioremediation farms may be undertaken pursuant to a county master grading Plan stamped by a registered professional engineer and a California certified engineering geologist and approved by the director of public works.*

*3i. No slope of cut or fill shall have a gradient steeper than two to one (2:1) unless specifically approved by a site specific geotechnical report.*

*4. Cuts and fills shall be minimized to avoid erosion and visual impacts.*

*2. Geotechnical Investigations. The operator shall comply with the following provisions:*

*a. A site-specific geotechnical investigation shall be completed for grading in excess of 5,000 cubic yards, unless associated with the on-site Bioremediation Farms and approved pursuant to a master grading Plan approved by the director of public works, and for any grading that supports or impacts a critical facility as determined by the director. The investigation shall be completed by a California certified engineering geologist and submitted to the director and the director of public works for review and approval, in conjunction with an application for a revised grading permit.*

*b. A site-specific geotechnical investigation shall be completed for all proposed permanent structures. The investigation shall include analysis and recommendations associated with potential seismically induced ground failure, such as differential settlement and lateral spreading. The geotechnical investigation shall be completed by a California-certified engineering geologist and submitted to the director of public works for review and approval.*

*3. Erosion Control. The operator shall comply with the following provisions:*

*a. The operator shall comply with all provisions of an erosion control Plan that has been approved by the director. The erosion control Plan shall be reviewed by the operator every two years to determine if modifications to the Plan are required. Any modifications to the erosion control Plan shall be submitted to the director for review and approval. The erosion control Plan shall include any measures requested by the director.*

*b. Erosion shall be controlled on all slopes and banks so that no mud or other substances are washed onto public streets or surrounding property. Such control measures may consist of planting and irrigation, dams, cribbing, riprap, sand bagging, netting, berms, or other devices.*

*4. Restoration of Slopes. Slopes shall be restored to their original grade once the use that required the grading of the slope has been discontinued. However, if restoration of a slope*

would negatively affect existing drainage patterns or slope stability, then the slope shall be restored to a grade that avoids these negative effects.

5. *Ground Movement Surveys.* The operator shall conduct ground movement surveys once every 12 months, or more frequently if determined necessary by the director of public works, following all provisions of a ground movement monitoring Plan that is acceptable to DOGGR and the director of public works, that calls for both vertical and horizontal ground movement surveys, at specified survey locations within, and in the vicinity of, the oil field, utilizing high precision Global Positioning System technology, in combination with a network of ground stations (or any alternative technology specified in the ground movement monitoring Plan approved by the director of public works), and following other survey methods outlined in the Plan. The surveys shall be conducted by a California-licensed surveyor. The survey results shall be analyzed in relation to oil field activities, such as production, steam injection, and waterflooding, taking into consideration individual oil producing zones, injection schedules, rates, volume, and pressure. The analysis shall be completed in collaboration by a California-registered professional petroleum engineer, registered geotechnical engineer, and certified engineering geologist. The results of the annual monitoring survey and analysis shall be forwarded to DOGGR and the director of public works. If requested by DOGGR or the director of public works, the operator shall make modifications to the ground movement monitoring Plan. In the event that survey indicates that on-going ground movement, equal to or greater than 0.6 inches at any given location, or a lesser value determined by the director of public works is occurring in an upward or downward direction in the vicinity of or in the oil field, the operator shall review and analyze all claims or complaints of subsidence damage that have been submitted to the operator or the county by the public or a public entity in the 12 months since the last ground movement survey. Based thereon, the operator shall prepare a report that assesses whether any of the alleged subsidence damage was caused by oil operations and submit said report to DOGGR and the department of public works. The department of public works shall review the report to determine if it concurs with its conclusions. If the report concludes that damage has not been caused by oil operations, and the department of public works does not concur in that conclusion, it shall forward its conclusions to DOGGR for its review and possible action. If the report concludes that damage was caused by oil operations and the department of public works concurs with any such conclusion, the department of public works shall forward the department of public works' conclusions to DOGGR and ask DOGGR to evaluate the operator's fluid injection and withdrawal rates to determine whether adjustments to these rates may alleviate the ground movement, and if so, where in the oil field such adjustments should be made. The operator shall implement whatever adjustments in the rates of fluid injection and/or withdrawal that DOGGR determines are necessary and appropriate to alleviate any ground movement damage. The county shall promptly notify the CAP of any such action that is taken pursuant to this subsection. Injection pressures associated with secondary recovery operations (i.e., water flooding) or disposal of produced fluids shall not exceed reservoir fracture pressures as specified in Title 14 of the California Code of Regulations, section 1724.10, and as approved by the DOGGR.

6. *Construction of Permanent Structures.* No permanent structures shall be constructed in an Alquist-Priolo Fault Zone without preparation of a fault study by a California-certified engineering geologist. Following the fault study, no permanent structures shall be placed within 50 feet of a known active fault. The fault investigation report shall be submitted to the director of public works for review and approval.

7. *Oil Field Accelerometer.* The operator shall operate and maintain an accelerometer at the oil field to determine site-specific ground accelerations as a result of any seismic event in the

*region (Los Angeles/Orange County and offshore waters of the Santa Monica Bay and San Pedro Channel). Readings from the accelerometer shall be recorded at the oil field and transmitted in real-time to the Caltech Seismological Laboratory. The operator shall cease operations and inspect all oil field pipelines, storage tanks, and other infrastructure following any seismic event that exceeds a ground acceleration at the oil field of 13 percent of gravity (0.13 g) and promptly notify the director. The operator shall not reinstitute operations at the oil field and associated pipelines until it can reasonably be determined that all oil field infrastructure is structurally sound.*

*8. Pipeline Management Plan. The operator shall maintain and implement a pipeline management Plan that meets the requirements of DOGGR regulations.*

*9. Paleontological Monitor. The operator shall have a qualified paleontologist, approved by the director, monitor all rough grading and other significant ground disturbing activities in paleontological sensitive sediments. The sensitive sediments that have been identified within the oil field include the Lower to Middle Pleistocene San Pedro Formation and the Middle to Upper Pleistocene Lakewood Formation. A paleontologist will not be required on site if excavation is only occurring in artificial fill or Holocene alluvium.*

**Summary of Complaints:**

Six complaints on property damage were received by the County for this review period (2014 through 2018); the County did not receive any complaints on ground movement. The property damage complaints listed various types of property damage from cracks in walls, garages, driveways, and hills sides. As listed in the analysis section below, each of the complaints was followed up with a property damage claim investigation.

**Summary of Issues Raised by the Public:**

Members of the public have expressed frustration with the requirements of the provision of the CSD on ground movement. The primary issue involves the lack of updated input from DOGGR on the subject to date, however, all data requested from the operator has been submitted and is under review by DOGGR. As additional input from DOGGR on the ground movement subject in the Baldwin Hills is received, the County will provide the information to the public via the Community Advisory Panel (CAP) meetings and/or the DRP Baldwin Hills website. In the past, DOGGR has expressed that there isn't sufficient data over the years of ground movement testing to suggest a pattern that requires regulatory intervention.

Additional input was received during recent 2019 CAP meetings whereby members of the public have expressed a desire to have the follow up geotechnical investigations performed by a different consulting firm than those involved in the annual ground movement survey reports. Currently, and consistent with Provision 22.310.050.D.5, the geotechnical consulting firm that assists with the preparation of the annual ground movement survey reports performs the follow-up investigations for property damage complaints. Also, consistent with CSD requirements, the property damage reports are completed by California-registered geotechnical engineers and certified engineering geologists. As these subject matter experts assist in the preparation and review the ground movement survey reports, they are very familiar with the geotechnical issues of the Baldwin Hills and are therefore uniquely qualified to perform the property damage complaint investigations. Since the current practice meets the requirements of the CSD the County does not recommend a change at this time, however, in deference to the interest of the

public on the issue, the County suggests the operator consider the use of an alternate firm for the property damage complaint investigations.

**Analysis of Compliance and Effectiveness:**

All grading at the oil field has been reviewed and approved by the County Public Works Department by the annual submittal of a master Grading Plan, submitted in October or November of each year. Grading associated with the operation of the bio farms is also included in the master Grading Plan. The Plan is prepared by a registered professional engineer and a California certified engineering geologist. Approval of the master Grading Plan by the County ensures no slopes have a gradient greater than two to one without a geotechnical report and that cut and fill is minimized to avoid erosion and visual impacts. The grading projects at the oil field to date have been 5,000 cubic yard or less, therefore, a site-specific geotechnical investigation pursuant to Provision 22.310.050.D.2.a has not been required. Geotechnical investigations have been completed for the installation of permanent structures at the oil field with the geotechnical reports submitted along with the County DRP Site Plan and Building and Safety permit applications. Examples of permanent structures requiring this analysis include the installation of two water tanks at the Upper Water Plant.

The *PXP 2009 Erosion Control Plan Inglewood Oil Field* was initially submitted on May 26, 2009, revised in October 2009 and approved by County Public Works in May 2010. The Plan describes the oil field site and the surrounding public streets and includes a discussion on typical erosion control strategies and the erosion control strategies used onsite at the oil field. Restoration of slopes at the oil field from grading activities has been completed consistent with the Erosion Control Plan and the master Grading Plan. In addition to the Erosion Control Plan, the oil field Storm Water Pollution Prevention Plan (SWPPP) contains measures and management practices to control mud from washing onto public streets or surrounding properties. The operator utilizes an environmental consulting company with expertise in storm water management to assist them in the implementation of the provisions of the SWPPP.



Ground movement surveys have been completed annually as required pursuant to the *Accumulated Ground Movement Plan* approved by County Department of Public Works (DPW) on November 10, 2009 and DOGGR on November 30, 2009. The surveys are completed using Global Positioning (GPS), Geodetic Leveling, and DifSAR processes and procedures as documented in the Ground Movement Monitoring Plan as approved by DPW and DOGGR. Baseline survey reports were submitted in January 2011 with revisions in March and October 2012. Annual survey reports are submitted each year to DOGGR and the DPW as required, the reports are available on the Inglewood Oil Field web site at [www.inglewoodoilfield.com](http://www.inglewoodoilfield.com).

Results of the ground movement surveys for 2014 through 2018 indicated vertical movement equal or greater than 0.6 inches in each year except 2015. CSD Provision 22.310.050.D.5 requires the operator to investigate all property damage complaints from the public in any year the 0.6-inch trigger is recorded. The previous and current operators have provided follow-up geotechnical investigations for each of the damage complaints independent of the Provision 22.310.050.D.5 trigger requirement. As noted above, six property damage complaints were received during this review period and five

follow-up investigation reports were completed (one complaining party did not provide access to the subject property). Results of the reports, and as concurred by Public Works and DOGGR geologists, determined local factors to be the most likely cause of the cracking of structures. These factors include construction in areas with substantial slopes on unconsolidated, unstable material that was not properly compacted at the time of construction; and that the construction of many residences preceded modern building codes and therefore were not built to today's more stringent construction standards. In addition, the areas surrounding the oil field are all within a seismically active location. The combination of all these factors is more likely to contribute to ground movement and potential property damage than the operations at the Oil Field which is monitored by the County and DOGGR.

No permanent structures have been constructed in an Alquist-Priolo Fault Zone since the adoption of the CSD, therefore, the preparation of a fault study required by subsection D.6 has not been required to date. The office, warehouse, and associated buildings are built within the fault zone overlay; however, construction of these structures predates the CSD requirement.

The oil field accelerometer seismic station was installed and began collecting data on May 20, 2009. The data is transmitted in real time by cell link to the CalTech Seismological Laboratory where the data is recorded and stored. The accelerometer has not measured ground acceleration in excess of the 13 percent of gravity (0.13 g) criteria of this provision to date, thus the oil field has not been required to shut in due to a ground acceleration event.

The Pipeline Management Plan required by subsection D.8 was submitted to DOGGR as required in December 2009; it has not been necessary to update the Plan to date.

The provision is considered fully effective at this time and no further analysis is recommended.

**New Technology:**

The scientific equipment used for the technical studies required pursuant to this provision is considered to be state of the art. The accelerometer is scheduled to be updated by CalTech in 2019. No recommendations for new technology are recommended at this time.

**Recommendations to Changes in Implementation:**

As discussed above, the County recommends the operator consider the use of an alternate geotechnical engineering firm for the property damage complaint follow-up investigations. The use of an alternate firm would bring an additional team of subject matter experts to the issue.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

**4.5 E. NOISE ATTENUATION**

*All oil operations on the oil field shall be conducted in a manner that minimizes noise and shall comply with the following provisions:*

*1. Noise Limits. The operator shall comply with the following provisions:*

a. All oil operations on the oil field shall comply with the noise provisions of Chapter 12.08 of Title 12 (Environmental Protection) of the County Code, with the exception of drilling, re-drilling, and reworking, which are exempt from the provisions of said chapter.

b. Hourly, A-weighted equivalent noise levels associated with drilling, re-drilling, and reworking shall not elevate existing baseline levels by more than five dBA at any developed area. For daytime activities (7:00 a.m. to 7:00 p.m.) existing baseline noise levels shall be defined as the maximum daytime equivalent noise level (Leq) at the closest monitoring site as shown in Table 4.9.3 of the 2008 Baldwin Hills Community Standards District Environmental Impact Report. For nighttime activities (7:00 p.m. to 7:00 a.m.), existing baseline noise levels shall be defined as the minimum nighttime equivalent noise level (Leq) at the closest monitoring site as shown in Table 4.9.3 of the 2008 Baldwin Hills Community Standards District Environmental Impact Report. Updated baseline noise levels may be set, and additional monitoring sites may be established, from time to time by the director. In no case shall baseline noise levels include any drilling, re-drilling, or reworking operations.

c. Noise produced by oil operations shall include no pure tones when measured at a developed area.

2. *Backup Alarms.* Backup alarms on all vehicles operating within the oil field shall be disabled between the hours of 8:00 p.m. and 8:00 a.m. During periods when the backup alarms are disabled, the operator shall employ alternate, low-noise methods for ensuring worker safety during vehicle backup, such as the use of spotters.

3. *Quiet Mode Drilling Plan.* All drilling and re-drilling on the oil field between the hours of 6:00 p.m. and 8:00 a.m. shall be conducted in conformity with a quiet mode drilling Plan that has been approved by the director and the director of public health. The quiet mode drilling Plan shall be reviewed by the operator every year to determine if modifications to the Plan are required. The operator shall make changes to the Plan if requested by the director or the director of public health. Any modifications to the quiet mode drilling Plan shall be submitted to the director and the director of public health for review and approval. The quiet mode drilling Plan shall include any measures requested by the director or the director of public health.

4. *Equipment Servicing.* All noise producing oil field equipment shall be regularly serviced and repaired to minimize increases in pure tones and other noise output over time. The operator shall maintain an equipment service log for all noise-producing equipment.

5. *Deliveries to the Oil Field.* Deliveries to the oil field shall not be permitted after 8:00 p.m. and before 7:00 a.m. except in cases of emergency. Deliveries on Sundays or legal holidays shall not be permitted after 8:00 p.m. or before 9:00 a.m., except in cases of emergency.

6. *Deliveries within the Oil Field.* Deliveries to areas of the oil field located within 500 feet of any residential property shall not be permitted after 5:00 p.m. or before 7:00 a.m. except in cases of emergency. Deliveries to such areas on Sundays or legal holidays shall not be permitted after 5:00 p.m. and before 9:00 a.m., except in cases of emergency.

7. *Time Limits for Construction.* Construction of permanent structures shall not be permitted after 7:00 p.m. and before 7:00 a.m., or during Saturdays, Sundays, or legal holidays.

8. *Construction Equipment.* All construction equipment shall be selected for low-noise output. All construction equipment powered by internal combustion engines shall be properly muffled and maintained.

9. *Construction Equipment Idling.* Unnecessary idling of construction equipment internal combustion engines is prohibited.

10. *Worker Notification.* The operator shall instruct employees and subcontractors about the noise provisions of this subsection E.5 prior to commencement of each and every drilling, redrilling, reworking, and construction operation, and shall annually certify to the director that such employees and subcontractors have been properly trained to comply with such noise provisions. The operator shall prominently post quiet mode policies at every drilling and redrilling site.

**Summary of Complaints:**

A total of 23 complaints for the years 2014 through 2018 have been logged regarding noise from the oil field with 10 identified with oil field activities, 2 associated with the SCE facility located on the oil field, 2 with offsite sources and 9 unknown as listed in the table below.

Noise Complaints 2014 through 2018	
Number of Complaints	Source
9	Unknown
2	SCE Facility
2	Drilling Rig
2	Maintenance Rig (banging pipe)
1	Crane Use
1	Pumping Unit
1	Well Abandonment near West LA College
1	Gas Meter Equipment
1	Heavy Equipment for Catch Basin Cleanout Activities
1	Oil Field Equipment
1	Offsite Construction Activities
1	Fourth of July Fireworks
<b>23</b>	<b>Total</b>

For noise that was identified with a source from the oil field, a drill rig, maintenance rig, or piece of oil field equipment was identified to be the primary cause of noise. Noisy equipment operation, such as the pumping unit noted in the table above, was ceased when identified and the equipment was repaired or replaced by the operator in a timely fashion. Maintenance of the catch/debris basins is required by the CSD and the noise from the equipment necessary to perform the work was limited to daytime, weekday hours.

**Summary of Issues Raised by the Public:**

Noise from the oil field has not caused any significant issues nor has the County received any input on noise during this review period.

Oil field noise was a discussion issue of the Settlement Agreement dated July 15, 2011 negotiated between concerned public parties, the County and the operator. The agreement revised the CSD with regards to allowable nighttime maximum noise levels at baseline monitoring locations. The agreement lowered the nighttime (10:00 p.m. to 7:00 a.m.) maximum noise level above the baseline value from the 5 dBA referenced in this provision to 3 dBA for



drilling, redrilling, and reworking activities. The agreement also stipulated that if those operations elevate nighttime baseline noise levels by more than 10 dBA for more than 15 minutes in any one hour, the source of the noise must be identified, and steps implemented to avoid such a noise elevation in the future.

**Analysis of Compliance and Effectiveness:**

Noise measurements were taken at seven sites around the perimeter of the oil field to assist in the preparation of the noise analysis section of the Final Environmental Impact Report, Baldwin Hills Community Standards District, October 2008 (FEIR). The FEIR was prepared as part of the environmental documentation used to develop the CSD. The seven monitoring sites were selected to represent the closest residential, recreational and educational uses to the oil field and included locations in Ladera Heights, Windsor Hills, Culver Crest, Kenneth Hahn State Recreation Area, and West Los Angeles College. The results of the noise monitoring were used to set baseline values for the noise limit criteria of sub-section E.1.b. of this provision.

The revised baseline monitoring locations were developed by a team of noise experts from the County Health Department, County DRP, the County ECC, and noise consultants assisting the County. PXP, the operator at the time, also provided noise expert consultants to assist with the determination of the baseline monitoring site selection. Six new monitoring sites were selected (the Settlement Agreement incorrectly references 11 monitoring locations) and monitoring occurred for 72 hours to generate the revised baseline data. The baseline monitoring data reports are available at the oil field web site at [www.inglewoodoilfield.com](http://www.inglewoodoilfield.com).

Sub-section E.1.b requires that noise levels from the operation of the oil field drilling, redrilling, and reworking shall not elevate existing baseline levels by more than 5 dBA at any developed area. As noted above, this requirement was revised to a maximum of 3 dBA from 10:00 p.m. to 7:00 a.m. by the Settlement Agreement for nighttime operations. Prior to the commencement of drilling, redrilling or reworking operations, noise monitoring equipment is set up at one of the six baseline monitoring stations and monitoring occurs 24 hours a day until the well work activity is completed. The monitoring location is selected by a noise expert consulting for the operator during an onsite visit; this review also includes direction to the operator in sound wall installation locations.

The County Department of Public Health (DPH) conducts noise monitoring at sampling points, dates, and times of day selected at random in locations within the surrounding communities with the highest risk of noise exposure from field operations. Noise monitoring was completed by DPH 59 times between February 12, 2014 and August 7, 2018 during both day and night hours, on weekends, and during different seasons with 60-minute sampling intervals. The average noise level recorded is 54.5 dBA, which is within the community noise background level.

Sub-section E.1.c requires that noise produced by oil operations shall include no pure tones when measured at a developed area. Pure tone noise is noise in which a single frequency stands out, usually high pitched, and can be more noticeable than sources that do not contain pure tones. The County has not documented any issues regarding pure tone noise to date.

The Quiet Mode Drilling Plan (QMDP) was first submitted in February 2009 and revised in April, July and September 2009. The Plan provides for quiet mode measures to reduce noise from drilling activities. Many of the measures are intended to reduce metal to metal contact activities known to increase noise around drilling operations. The QMDP also includes training of service personal and subcontractor staff and quiet mode signage posted at drilling sites listing the quiet mode drilling rules. The training occurs twice each day prior to the start of each drilling shift. As

noted above, two noise complaints associated with the drilling rig occurred during this review period. The drilling rig was approximately 600 feet from a residence for both subject complaints which occurred in March 2014. No recent drilling activity has occurred at the oil field with the last well drilled in June 2014.

The Annual Well Increase Evaluation, December 2011, included a discussion of the effectiveness of the CSD noise provisions. The report identified that some of the noise complaints may have been associated with operation of the pipe storage rack. In response to this finding, the storage rack was relocated to the center of the oil field east of the Vickers bioremediation farm. The new location is a greater distance from residential noise receptors. The report also concluded that none of the noise complaints were found to be related to drilling operations. The report concluded that the CSD has been effective at keeping noise to a level that would be considered protective of the health and general welfare of the public.

The County ECC checks field operations with a portable noise meter for compliance during the regular EQAP site inspections and annual audits. The QMDP also includes the other noise minimization measures required by this provision. Back-up alarms are not used during nighttime hours and deliveries to the oil field and within the oil field are restricted as required in sub-sections E.5 and E.6. The delivery restrictions are posted at the main gates consistent with the requirements of Provision 22.310.050.M, *Signs*. The operator complies with the time limits for construction of permanent structures, no construction occurs after 7:00 p.m. and before 7:00 a.m., or during Saturdays, Sundays, or legal holidays.

Subsections E.8 and E.9 list requirements for construction equipment maintenance and operation. Equipment is serviced and is properly muffled pursuant to the manufacturer's specifications. Subsection E.10 lists the requirement for worker notification of the noise minimization measures listed by this condition. All employees and sub-contractors are trained to comply with these noise provisions each year during annual certification training.

As documented above, the noise provisions of the CSD have been implemented, are ongoing, and considered to be fully effective at this time, with no further analysis recommended.

**New Technology:**

The noise minimization measures required by this provision and as contained in the QMDP represent current best industry practice to limit noise from the operation of an oil field. In addition, this provision requires that *"oil operations on the oil field shall be conducted in a manner that minimizes noise..."*, thus new technologies in noise minimization methods can be implemented as applicable to oil field operations in the course of ongoing compliance monitoring without the need for amendments to the CSD.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No recommendations in the CSD language are recommended at this time.

#### **4.6 F. VIBRATION REDUCTION**

*All oil operations on the oil field shall be conducted in a manner that minimizes vibration. Additionally, vibration levels from oil operations at the oil field shall not exceed a velocity of 0.25 mm/s over the frequency range 1 to 100 Hz at any developed area.*

##### **Summary of Complaints:**

The County has received five complaints associated with vibration from 2014 through 2018. Two of the complaints were associated with heavy equipment used to clean out a debris basin in advance of winter weather as required by CSD Provision 22.310.050.C.4.b. One complaint was associated with a resident landscaping project and the source of two complaints was not identified.

##### **Summary of Issues Raised by the Public:**

The County did not receive any input on vibration during the 2014 through 2018 time frame except for the complaints discussed above.

##### **Analysis of Compliance and Effectiveness:**

The *Final Environmental Impact Report, Baldwin Hills Community Standards District, October 2008 (FEIR)*, prepared as part of the documentation necessary to develop the CSD, analyzed potential vibration issues at the oil field. Section 4.9 of the FEIR, *Noise and Vibration*, includes vibration monitoring data for typical drilling activities at the oil field. Results of the drilling activity vibration monitoring indicated the measured vibration levels did not exceed the criteria specified by this provision. The vibration criteria were not exceeded even with some monitoring data points as close as 50 feet from the drilling rig. Based on these monitoring results, the FEIR concluded that vibration impacts from drilling would not be considered significant.

The report prepared by the County in response to the request by PXP in October 2011 to increase the annual number of wells allowable for drilling or re-drilling, the *Annual Well Increase Evaluation, December 2011*, includes analysis on the implementation of the vibration provision of the CSD. The report concluded that the CSD requirements have been effective at keeping vibration to a level that is considered protective of the health and general welfare of the public. Section 22.310.060.F of the CSD, *Vibration Monitoring*, provides for the County Public Health Department to request vibration monitoring as deemed necessary in areas surrounding the oil field. Based on the compliance reports documented for the oil field and the minimal amount of public complaints on vibration; additional vibration monitoring has not been deemed necessary to date.

The condition is considered fully effective at this time, no further evaluation is recommended.

##### **New Technology:**

No other new technologies for vibration minimization for oil field operations have been identified at this time.

##### **Recommendations to Changes in Implementation:**

This requirement has been implemented and no changes to implementation are recommended.

##### **Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

#### **4.7 G. BIOLOGICAL RESOURCES**

*All oil operations on the oil field shall be conducted in a manner that minimizes impacts to biological resources and shall comply with the following provisions:*

*1. Oil Spill Response. The operator shall comply with all provisions of an Emergency Response Plan ("ERP") that has been approved by the director, to protect biological species and to revegetate any areas disturbed during an oil spill or clean-up activities. The operator shall make changes to the ERP if requested by the director. Any modifications to the ERP shall be submitted to the director for review and approval. The ERP shall include any measures to protect biological species that may be requested by the director.*

*2. Special Status Species and Habitat Protection. The operator shall comply with all provisions of a special status species and habitat protection Plan that has been approved by the director. The operator shall make changes to the Plan if requested by the director. Any modifications to the Plan shall be submitted to the director for review and approval. The special status species and habitat protection Plan shall include any measures requested by the director.*

*3. Habitat Restoration and Revegetation Plan. Prior to any disturbance of sensitive natural habitat areas, as identified in the special status species and habitat protection Plan, the operator shall hire a biologist, approved by the county, to conduct a survey of the area to determine if significant impact to sensitive natural habitat, including coastal sagebrush, coyote bush scrub, riparian scrub, and oak woodland will occur. If the biologist determines that significant impact to sensitive natural habitat will occur, then the operator shall have a county-approved restoration specialist, with expertise in southern California ecosystems and revegetation techniques, prepare a habitat restoration and revegetation Plan. The Plan shall be submitted to the director for review and approval. The director shall make best efforts to complete the review of the Plan as expeditiously as possible and shall then either approve the Plan or provide the operator with a list of specific items that must be included in the Plan prior to approval. No removal of sensitive natural habitat shall occur until the Plan has been approved by the director. The habitat restoration and revegetation Plan shall include any measures requested by the director.*

*4. Pre-Construction Surveys. The following surveys shall be conducted prior to any significant vegetation removal in sensitive natural habitat as identified in the special status species and habitat protection Plan.*

*a. The operator shall hire a county-approved ecologist/botanist to conduct sensitive plant surveys.*

*b. The operator shall hire a county-approved biologist to conduct sensitive wildlife surveys in habitat areas that could support sensitive wildlife species.*

*c. The operator shall hire a county-approved biologist to conduct breeding and nesting bird surveys if the construction activities would occur during the breeding season (February 1 to August 31 for raptors, and March 15 to September 15 for sensitive/common birds).*

*d. The operator shall hire a county-approved wetland delineator to delineate any wetlands that would be affected by construction.*

5. *Listed Plant or Wildlife Species.* If federal- or State-listed plant or wildlife species are found, then the operator shall comply with all applicable United States Fish and Wildlife and California Department of Fish and Game rules and regulations.

6. *Construction Monitoring.* If the pre-construction surveys find sensitive plant, wildlife species, or nesting birds, a biological monitor hired by the operator, and approved by the County, shall be on site during construction to monitor the construction activities. The biological monitor shall be responsible for the following:

- a. *Establishing a 300-foot buffer around any active breeding bird nests.*
- b. *Assuring that vegetation removal does not harm sensitive wildlife species.*
- c. *Monitoring the construction area for sensitive wildlife species and relocating them to suitable habitat outside of the construction area.*
- d. *Ensuring that exclusionary fencing is installed around the construction area to prevent sensitive wildlife species from entering the construction area.*

7. *Tree and Riparian Scrub Removal.* Removal of native or non-native trees and riparian scrub vegetation shall be scheduled, as possible, for removal outside the nesting season to avoid impacts to nesting birds. If avoidance of removal of trees or riparian scrub during the recommended periods is not possible, a county-approved biologist shall perform a survey to ensure that no nesting birds are present prior to removal. If for any reason a nest must be removed during the nesting season, the operator shall provide written documentation to the director demonstrating concurrence from the United States Fish and Wildlife Service and California Department of Fish and Game authorizing the nest relocation and a written report documenting the relocation efforts.

8. *Habitat Restoration.* Within 60 days of completion of construction activities that have significantly impacted sensitive natural habitat, the operator shall begin habitat restoration consistent with the approved native habitat restoration and revegetation Plan discussed in subsection E.7.c. Restoration priority shall be given to areas of degraded habitat connecting areas of higher quality habitat and where restoration would produce larger corridors to support the migration and movement of wildlife. The operator shall replace any significant loss of sensitive natural habitat at the following ratios:

- a. *1:1 for each acre of coastal sagebrush or coyote bush scrub.*
- b. *2:1 for each acre of riparian scrub or oak woodland.*

**Summary of Complaints:**

No complaints regarding the biological resources or the provisions for protection of biological resources have been received by the County.

**Summary of Issues Raised by the Public:**

No issues have been raised by the public on biological resources or the provisions for protection of biological resources.

**Analysis of Compliance and Effectiveness:**

The Emergency Response Plan (ERP), current version dated June 2019, was updated for specific response considerations for biological resources in March 2010. The ERP is submitted to the following agencies; California Division of Oil, Gas, Geothermal Resources (DOGGR), California Department of Fish and Wildlife Office of Spill Prevention and Response (OSPR), U.S. Environmental Protection Agency Region 9, California State Lands Commission Marine Facilities Division Planning Branch, and the U.S. Department of Transportation Office of Pipeline Safety. To date, the ERP has not been needed to be activated to protect biological resources at the oil field.

The *Special Status Species and Habitat Protection Plan* was first prepared in 2009 and was approved on November 15, 2010. The Plan was prepared by a County approved ecologist/biologist. Compliance with subsections G.2 through G.8 is documented annually since 2010. Annual compliance documentation consists of a *Special Status Species Compliance Report*. The report documents the status and activities for the subject year involving biological resources at the oil field and includes an appendix compliance matrix which details the construction and well activities, any impacts to biological resources and the associated surveys or compliance requirements conducted pursuant to this provision. The reports are reviewed each year by the County.

Prior to the initiation of drilling activities for each year, the operator provides a County approved biologist with the forthcoming drilling schedule and associated compliance matrix for review. The biologist prepares a schedule for pre-construction biological surveys required by subsection G.4 and the surveys are completed within one week of the initiation of construction activities or vegetation removal. Monitoring occurs if necessary and a final survey is conducted upon completion of construction activities to document final impacts. Biological surveys are submitted with each of the site Plan permit requests submitted to the county for each well proposed to be drilled. Drilling activities during this review compliance period (2014 through 2018) were completed by June 2014 with a total of 18 wells drilled; none of these wells required a biological survey.

Construction projects may also impact sensitive resources and require pre-construction biological surveys. Biological surveys for construction projects for the years 2014 through 2018 are summarized in the table below.

<b>Construction Project Biological Survey Summary 2014-2018</b>					
<b>Year</b>	<b>Number Projects</b>	<b>Nesting Bird</b>	<b>Additional Bird Surveys Required</b>	<b>Vegetation</b>	<b>Wildlife</b>
2014	12	Yes	No	No	No
2015	2	Yes	No	No	No
2016	3	Yes	No	No	No
2017	0	No	No	No	No
2018	0	No	No	No	No

The habitat restoration requirements of subsection G.8 have not been triggered to date because the cumulative amount of sensitive habitat disturbed has not reached the one-acre criterion, therefore, no habitat restoration activities have occurred at the oil field. A habitat restoration plan will be prepared and submitted to the County for review and approval when the impact to sensitive habitat reaches the one-acre trigger.

The provision is considered fully effective at this time noting that the habitat restoration requirements have not been triggered to date, no further analysis is recommended.

**New Technology:**

The ERP, special status species and habitat protection, and habitat restoration plans required by this provision are submitted and approved by regulatory agencies. As these plans are periodically updated and/or the CSD language allows flexibility for additional measures as required by the County, improvements in habitat protection and restoration can be required by the County without the need for amendments to the CSD and can be adopted as they arise. No improvements are deemed necessary at this time and none are proposed.

**Recommendations to Changes in Implementation:**

This requirement has been implemented and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

**4.8 H. CULTURAL/HISTORIC RESOURCES**

*The operator shall comply with all of the following provisions:*

- 1. Cone Trust House. Oil operations shall not result in impacts to the Cone Trust House.*
- 2. Archeological Training. The operator shall provide archeological training for all construction personnel who will be involved with ground disturbance activities at the oil field. All such construction personnel shall be required to participate in the training and will receive training material prepared by a qualified archaeologist prior to working on ground disturbance activities.*
- 3. Construction Treatment Plan. The operator shall comply with all provisions of a construction treatment Plan, approved by the director, to ensure that any new archeological discoveries are adequately recorded, evaluated, and, if significant, mitigated. In the event that unknown archaeological artifacts are encountered during grading, clearing, grubbing, and/or other construction activities, work shall be stopped immediately in the vicinity of the find and the resource shall be evaluated by a qualified archaeologist, approved by the director. The construction treatment Plan shall include any measures requested by the director.*

**Summary of Complaints:**

No complaints on cultural or historic resources have been received from the public. The oil field is private property and is not open to the public.

**Summary of Issued Raised by the Public:**

The County received comments during the scoping comment period for the Periodic Review from an Environmental Group coalition. The comments concerned consultation with the Tongva Nations, Tongva Nation resources and suggested mitigation measures for tribal cultural resources. Section 4.12 of the Baldwin Hills CSD EIR addressed cultural resources including the potential for presence of archaeological resources at the oil field. Over 30 cultural resource investigations have been conducted within ½ mile of the Inglewood Oil including a study completed in April/May 2007 specific to the EIR to identify any existing resources that would be potentially affected by activities on the oil field. Two historic archaeological sites, both trash

scatters consisting of bottles and other refuse dated between 1915 and 1935, and a historic architectural resource, the Cone Trust house, were identified.

Due to the fact that field survey could not exclude the possibility that unrecorded buried archaeological material could exist and be encountered during grading, clearing, grubbing, and/or other construction activities mitigation measures were developed to protect potential cultural resources. Baldwin Hills CSD EIR mitigations measures CR.2-1 and CR.2-2 as summarized in the table below were incorporated into the CSD as Provision 22.310.050.H.

<b>Cultural Resource Mitigation Measures/CSD Requirements</b>		
<b>Mitigation Measure</b>	<b>Summary</b>	<b>CSD Provision</b>
CR.2-1	Training of construction workers to identify sensitive archeological resources.	22.310.050.G.1 Worker Training
CR.2-2	Contract with a qualified archeologist to evaluate and record any unknown cultural sites that may be discovered during construction.	22.310.050.G.2 Construction Treatment Plan

**Analysis of Compliance and Effectiveness:**

The Cone Trust House and surrounding area are off limits to oil field staff to prevent any impacts to the historic building. A representative from the Cone Fee Family Trust sits on the Community Advisory Panel (CAP). A discussion of the significance of the Cone Trust House is included in the cultural resource sensitivity training of the oil field archaeological training program.

The archeological training program, as required by subsection H.2, was initially conducted on May 26, 2009. This training program is repeated annually along with the other employee awareness training requirements of the CSD.

The *Construction Treatment Plan* was initially submitted in May 2009, revised in July 2010, and was formally approved on January 24, 2011. The Plan includes a cultural history of the oil field site, an overview of cultural resource artifacts, the presence of cultural resources at the oil field, a discussion of the Cone Trust House, and a section on cultural resources sensitivity training. The Plan also includes the Inadvertent Cultural Resource Discovery and Impact Form, Cultural Resource Training Materials, and an Inadvertent Cultural Resource Discovery Communication Chart. The Plan is available on the oil field web site at [www.inglewoodoilfield.com](http://www.inglewoodoilfield.com). No incidents requiring the implementation of the Inadvertent Cultural Resource Discovery procedure occurred during the 2014 through 2018 time period covered by this report.

The cultural resource training along with the Cultural Resource Discovery and Impact Form and Inadvertent Cultural Resource Discovery Communication Chart provide measures to protect potential cultural resources. In addition, the qualified archaeologist as required through CSD subsection H.2 can consult with representatives from the Tongva Nations as applicable for a discovery of cultural resources. The condition is considered fully effective at this time and no further evaluation is recommended.

**New Technology:**

The annual cultural sensitivity and archaeological training required under Provision 22.310.050.H.2 allows for the introduction and implementation of new technologies in cultural resource protection as they become available and applicable to the oil field. However, no



improvements are identified at this time. If in the future improvements are deemed merited, they can be adopted as part of compliance review without the need for a Periodic Review.

**Recommendations to Changes in Implementation:**

This requirement has been implemented and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

**4.9 I. LIGHTING**

*Outdoor lighting shall be restricted to only those lights which are required by code for the lighting of building exteriors, drilling, and redrilling rigs and for safety and security needs. In addition, the operator shall comply with the following provisions:*

*1. Screening. All new point lighting sources within the oil field shall be screened and directed to confine direct rays to the oil field and to prevent offsite spillover lighting effects to the extent feasible.*

*2. Lighting Plan. A detailed lighting Plan shall be prepared for each new permanent structure and submitted to the director for review and approval. No work may be commenced on such permanent structure until the lighting Plan therefore has been approved by the director. The lighting Plan shall include any measures requested by the director.*

**Summary of Complaints:**

No complaints regarding lighting have been documented for the period 2014 through 2018.

**Summary of Issues Raised by the Public:**

The County has not received any concerns regarding the lighting at the Inglewood Oil Field.

**Analysis of Compliance and Effectiveness:**

Lighting at the oil field is primarily associated with the gas plant and tank farm facilities. Additional lighting is used with drill rig equipment as those operations occur 24 hours a day; office and outbuilding security lighting, and with limited vehicle traffic. The gas plant and the tank farms require lighting for operational and safety reasons. The lighting fixtures are screened to orient the light downward toward the area requiring illumination as feasible. Other lighting, such as security lighting at the office building, uses hood type screening fixtures to focus the light downward. Shortly after the CSD was implemented in November 2008, an assessment of all oil field lighting was completed to confirm compliance with the CSD lighting provisions and to confirm that there were no offsite lighting impacts.

Lighting for drilling rig operations at the oil field has been minimized to the maximum extent feasible given the operational and safety requirements necessary. Lights are focused downward from the monkey board of the drilling derrick as opposed to ground-based flood lighting orientated upwards. Other rig operations at the oil field such as well reworking rigs are limited to daytime operations from 7:00 am to 7:00 pm as required by subsection BB.3. Except for drill rigs which are required and permitted to operate 24 hours a day, SPR operations policy for all other rig operations in the oil field is to limit work activities to day light hours only and to avoid using lighting whenever possible. When operational or safety issues require working past sundown, as may occur during the wintertime, portable lights are brought in to complete the

necessary work. These portable lights are shielded and focused downward toward the work area and work is halted by 7:00 pm as required by the CSD.

No new permanent structures requiring a lighting Plan have been proposed by the previous operators or SPR, therefore, CSD provision E.9.b has not been activated to date.

Lighting at the oil field meets the criteria outlined in CSD Provision 22.310.050.I. Lighting has not been an issue with the public, the provision is considered fully effective at this time and no further analysis is recommended.

**New Technology:**

New permanent structures at the oil field are subject to CSD Provision 22.310.050.I.2 which requires a lighting Plan approved by the County. As such, as new technologies in lighting become available, the County can require implementation of those technologies through the lighting Plan review and approval process for any new permanent structure.

**Recommendations to Changes in Implementation:**

The lighting at the oil field is consistent with the CSD requirements for lighting and thus the provision has been implemented; no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The lighting at the oil field is in compliance with the CSD requirement and there have been no complaints or public issues from oil field lighting to date. Therefore, no changes in the CSD language are recommended.

**4.10 J. LANDSCAPING, VISUAL SCREENING, IRRIGATION AND MAINTENANCE**

*The operator shall comply with the conceptual landscaping Plan for the oil field prepared by Mia Lehrer & Associates, dated October 2008, on file at the department of regional planning, which is intended to beautify and screen the oil field from adjoining residential, recreational, and institutional areas or adjacent public streets or highways. Landscaping required by this Plan shall be completed in phases over a two-to five-year period as approved by the director. All landscaping on the oil field shall be routinely inspected (on at least a monthly basis) and maintained in a neat, clean, and healthful condition, including proper watering, pruning, weeding, fertilizing, and replacement of plants as needed. Litter shall also be removed on a regular basis.*

**Summary of Complaints:**

Two complaints were received on landscaping during this review period. One complaint stated the landscaping was unacceptable, but the complaining party did not follow up with the operator on the issue. The second complaint involved landscaping trees/plants damaged by high winds in March 2015. The ECC followed up on the damaged trees on March 26, 2015 with an inspection and noted several recently planted trees required readjustment of support poles which was corrected by the landscape contractor. Subsequent inspections found the subject trees growing normally and in good condition.

**Summary of Issues Raised by the Public:**

Input on the aesthetics of the oil field relative to vegetation and landscape screening was received by the County in comments solicited for the Periodic Review. Culver City commented that the landscaping does not adequately screen the oil field from Culver City and requested the

CSD be revised to include more landscaping measures to screen the oil field from adjacent residences, parks, and public view areas. However, it should be noted that Culver City was a participating litigant in, and in agreement with the terms of, the Settlement Agreement which revised and enhanced the CSD landscaping plans. The landscaping section of the Settlement Agreement is further discussed below.



Input on the landscaping effort was also received as part of the Settlement Agreement dated July 15, 2011 negotiated between concerned public and government parties, the County and PXP (now SPR). The agreement requires the operator to prepare and implement a series of landscaping plans that enhance the *Mia Lehrer Landscape Improvements Concept Plan* referenced by this provision. The agreement further requires the landscape plans be submitted to the Community Advisory Panel (CAP) for review, and to install the first two phases of landscaping within nine months of County final approval of the plans. The agreement further required the operator will complete the entire landscaping required by the County-approved Landscape Plans within three years after approval by the County of the final phase. As noted below, the landscaping plans and installations were completed pursuant to the revised agreement.

**Analysis of Compliance and Effectiveness:**

The *Landscaping Plan Inglewood Oil Field* was first submitted in May 2009 and was revised in November 2010. This base Plan outlines seven phases of landscaping effort, prioritized by concerns for screening areas of public corridors and water conservation considerations with subsequent plans prepared for each landscaping phase. Landscaping for Phase 1 and 2 involved the areas at the Ladera Crest residential viewshed looking north and along the Windsor Hills/La Brea traffic corridor viewshed, respectively. Phase 3 landscaping addresses the Ladera Crest residential viewshed looking east. Phases 4 and 5 involve a roadway buffer along La Cienega Boulevard. Phase 6 is a landscape buffer for the Fairfax Avenue roadway and Phase 7 is a landscaping buffer for Stocker Street. All landscaping was completed in December 2018 as listed in the table below.

Phase	Plan	Landscaping
1 - Ladera Crest View-shed North	Approved May 2011	Completed October 2011
2 – Windsor Hills/ La Brea View-shed	Approved October 2011	Completed June 2012
3– La Brea View-shed East/La Cienega Blvd.	Approved June 2013	Completed December 2018.
4 - La Cienega Blvd. Roadway	Approved June 2013	Completed November 2016
5 – La Cienega Blvd. Roadway	Approved June 2013	Completed November 2016
6 – Fairfax Avenue Roadway	Approved April 2016	Completed November 2017
7 – Stocker Street Roadway	Approved April 2016	Completed December 2018.

The ECC reviews the landscaping during site inspections and the landscaping contractor is monitoring the progress of the recently completed phases and will replace any trees or shrubs as necessary during the calendar year 2019. All landscaping required by the CSD and Settlement Agreement has been completed. This provision is considered fully effective at this time, no further analysis is recommended.

**New Technology:**

Water saving drip irrigation is used where feasible; use of recycled water has not been implemented to date because it is not available to the oil field at this time.

**Recommendations to Changes in Implementation:**

As noted above, all required landscaping has been completed and is being monitoring by the County and the operator. This provision is implemented as intended, no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

This provision has been implemented and was augmented by the Settlement Agreement and no changes in the CSD language are recommended.

**4.11 K. OIL FIELD WASTE REMOVAL**

*The operator shall comply with the following provisions:*

*1. Waste Collection. All drilling, redrilling, and reworking waste shall be collected in portable steel bins compliant with United States Department of Transportation standards. Any drilling, redrilling, and reworking wastes that are not intended to be injected into a Class II Well, as permitted by DOGGR, shall be removed from the oil field no later than 30 days following completion of the drilling, redrilling, and reworking. This provision does not apply to active sumps and mud pits.*

*2. Waste Discharge. No oil field waste shall be discharged into any sewer, storm drain, irrigation systems, stream or creek, street, highway, or drainage canal. Nor shall any such wastes be discharged on the ground provided that the foregoing shall not prohibit the proper use of active drilling sumps and mud pits.*

*3. Recycling Plan. The operator shall comply with all provisions of a recycling Plan that has been approved by the director. The recycling Plan shall include any elements requested by the director.*

**Summary of Complaints:**

No complaints associated with waste removal at the Inglewood Oil Field have been received by the County.

**Summary of Issues Raised by the Public:**

The County has not received any public input regarding waste removal for the period 2014 through 2018.

**Analysis of Compliance and Effectiveness:**

Waste generated by drilling, re-drilling, and reworking activities is collected in bins and emptied with the use of a vacuum truck as necessary. The previous operators and SPR do not use sumps or mud pits (see discussion for CSD Provision 22.310.050.O), and all such waste is contained in metal or plastic bins. All waste from drilling, re-drilling, and reworking sites is removed within 30 days of the completion of the activity; waste is trucked to several facilities permitted to accept the subject materials. Inspection of drilling, re-drilling, and reworking is part of the periodic inspections completed by the County ECC as required by CSD Provision 22.310.060.B. As noted above, the subject waste is collected in bins and is not discharged to the ground. As mentioned in the discussion for CSD Provision 22.310.050.C.4 and as documented in the *PXP Retention Basin Study*, the oil field retention basins are adequately size and maintained to handle the contents of the largest tank at the oil field along with 100-year storm event precipitation volume. Therefore, any spilled fluid waste material will remain within the oil field secondary containment and or retention basin system and not cause any offsite impacts. The retention basins are visually inspected during the dry months by the County ECC to confirm they are clean and free of debris and are prepared for each rain year by a storm water management consultant.

Subsection K.3 requires compliance with an approved Recycling Plan. The *PXP Recycling Plan Inglewood Oil Field* was approved on October 3, 2011. The Plan, originally submitted as required by CSD Provision 22.310.120, on May 26, 2009, details the approach to recycling various types of waste at the oil field. The Plan provides protocols for the following types of recycled waste; tires, cell phones, batteries, scrap metal, computer components, industrial waste, office waste, and landscaping waste. The Plan also includes an education program for employees and contact information for waste recycling and disposal vendors.

The provision is considered fully effective at this time and no further analysis is recommended.

**New Technology:**

The oil field waste removal system currently implemented at the oil field is consistent with current technology. The oil field contains all waste from drilling, re-drilling, and reworking activities in bins and does not use in-ground sumps or pits. The Recycling Plan approved by the County includes current recycling techniques and waste streams, however, new technologies in recycling in the future should be considered as applicable at the oil field.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended, oil field waste is contained and recycled as required; therefore, no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

This requirement is implemented as intended consistent with the CSD language, and no changes in CSD language are recommended.

**4.12 L. CONSTRUCTION OF PRIVATE ROADS**

*Roads and other excavations shall be designed, constructed, and maintained to provide stability of fill, minimize disfigurement of the landscape, prevent deterioration of vegetation, maintain natural drainage, and minimize erosion. Prior to construction of any new road, the operator shall prepare and submit to the director of public works for review and approval a private road construction Plan. The operator shall thereafter comply with all provisions of the approved*

*private road construction Plan. All new private access roads leading off any surfaced public street or highway shall be paved with asphalt or concrete not less than three inches thick for the first 50 feet of said access road from the public street or highway.*

**Summary of Complaints:**

No private roads have been constructed at the Inglewood Oil Field since the adoption of the CSD; no complaints on this provision have been received by the County.

**Summary of Issues Raised by the Public:**

No private roads have been constructed at the Inglewood Oil Field since the adoption of the CSD and no issues regarding the construction of private roads have been raised by the public to date.

**Analysis of Compliance and Effectiveness:**

No private roads have been constructed to date and all oil field activities utilize existing access roads. This requirement has not been activated to date, and no further evaluation is recommended.

**New Technology:**

No private roads have been constructed at the oil field since the adoption of the CSD; however, as required by the CSD provision, any new road requires the preparation and approval of a private road Construction Plan. Required review of any plan for a private road by the director of public works will allow for review of new technology or updated County grading requirements. Therefore, implementation of such new technology can be required as applicable.

**Recommendations to Changes in Implementation:**

This requirement has not been activated to date; therefore, no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

This requirement has not been activated to date and no changes to the CSD language are recommended.

**4.13 M. SIGNS**

*All signage shall comply with Chapter 22.114 (Signs). In addition, the operator shall comply with the following provisions:*

*1. Perimeter Identification Signs. Identification signs, at intervals acceptable to the director, shall be posted and maintained in good condition along the outer boundary line fence and along the fences adjoining the public roads that pass through the oil field. Each sign shall prominently display current and reliable emergency contact information that will enable a person to promptly reach, at all times, a representative of the operator who will have the expertise to assess any potential problem and recommend a corrective course of action. Each sign shall also have the telephone number of the county department of regional planning zoning enforcement section and the number of SCAQMD that can be called if odors are detected.*

*2. Main Entrance Sign. A sign shall be posted and maintained in good condition at the main entrance of the oil field prominently displaying a telephone number by which persons may*

*contact a representative of the operator at all times to register complaints regarding oil field operations.*

*3. Other Required Signs. All identification signs, warning signs, no trespassing signs, and other signs required by county, State and federal regulations shall be properly posted and maintained in all required locations and in good condition.*

*4. Well Identification Signs. Well identification signs including the well name and well number shall be posted and maintained in good condition at each well location.*

*5. No Littering Signs. "No littering" signs shall be prominently posted and maintained in good condition on all oil field entrance gates.*

**Summary of Complaints:**

The County approved the *Signage Plan Inglewood Oil Field* on May 18, 2009 and the required signage was installed. No complaints regarding the signage have been received by the County.

**Summary of Issues Raised by the Public:**

The County has not noted any issues raised by the public regarding the facility signage.

**Analysis of Compliance and Effectiveness:** The installation of the signage required by this CSD provision was completed upon approval of the *Signage Plan Inglewood Oil Field* dated January 2009 (Revision 1) approved by the County on May 18, 2009. The required signage is periodically reviewed during inspections completed by the County ECC. Faded or damaged signage is noted and recommended for repair or replacement. The 1-800 24-hour contact number, the South Coast Air Quality Management District, and the L.A. County Department of Regional Planning Zoning Enforcement section have all received calls from the public inquiring about oil field activities since the installation of the signs. Some of this correspondence indicates the signage may be providing the public with contact information as intended under CSD Provisions M.1 and M.2 (the contact information is also available via the Inglewood Oil Field and County DRP web sites).



SPR has completed the process of reviewing and replacing applicable signs to reflect the name change from FM O&G to SPR. The provision is considered fully effective at this time, no further analysis is recommended.

**New Technology:**

As noted above, the County ECC inspector notes when signage requires replacement or repair. Therefore, signs will be updated periodically to ensure they are legible and meet the requirements of the CSD.

**Recommendations to Changes in Implementation:**

The required signage at the oil field was installed per the Signage Plan approved on May 18, 2009; no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

**4.14 N. PAINTING**

*All oil operation-related structures visible from public roadways and surrounding properties within the oil field shall be painted or otherwise surfaced or textured with a color that is compatible with the surrounding areas and has been approved by the director. The painting or other surfacing of all structures covered by this subsection shall thereafter be maintained in good condition.*

**Summary of Complaints:**

No complaints regarding the painting of the Inglewood Oil Field have been received by the County.

**Summary of Issues Raised by the Public:**

The County has not noted any issues raised by the public about the painting of the Inglewood Oil Field.

**Analysis of Compliance and Effectiveness:**

The painting of the Inglewood Oil Field structures and equipment was completed on November 12, 2012. The paint color, *licorice*, was chosen with assistance of a landscape architect and was approved by the LA County Department of Regional Planning. The color, which is much darker than the previous industry standard paint color tan or light brown, is intended to blend and be compatible with surrounding areas. The *Annual Well Increase Evaluation, December 2011*, included a discussion of the painting of the oil field facilities and the darker color of paint. The report concluded that the dark color helps to blend the equipment into the background, thereby reducing the visual and aesthetics of the oil field.

Prior to completion of the painting in November 2012, semi-annual status reports were submitted to the County for review to document progress of the facility painting. Although the initial painting effort for the oil field was completed in late 2012, maintenance of the painting and coatings of the equipment and structures at the oil field is a continuous process. The operator maintains a painter and a specialty painter on contract along with a schedule and priority list for the painting contractors to maintain the coatings on the structures and equipment at the oil field.

The Inglewood Oil Field has been painted with a color approved by the County and the coatings are maintained by the operator. The provision is considered fully effective at this time, no further analysis is recommended.

**New Technology:**

As noted above, the painting color approved is darker than the previous industry standard color of tan or light brown. Darker colors have been shown to blend and be more compatible with surrounding areas than the lighter shades previously chosen for oil field facilities.

**Recommendations to Changes in Implementation:**

The required painting of the Inglewood Oil Field was completed with the approved color in November 2012. The coatings are maintained by the operator; therefore, the implementation of the condition is complete and no changes to implementation are recommended.



**Recommendations to Changes in CSD Language:**

The required painting and maintenance of the coatings of the Inglewood Oil Field structures and equipment has been implemented; no changes to the CSD language are recommended.

**4.15 O. SUMPS**

*The operator shall comply with the following provisions:*

*1. Sump Clean Out. All sumps that are used, installed, or maintained for use in connection with any well, and which have not been used for 90 days for the operation of or the drilling, re-drilling, or reworking of such well or any other well in the vicinity, shall be cleaned out, and all oil, rotary mud, and rubbish removed.*

*2. Sump Fencing. Around each sump of any depth, there shall be erected and continuously maintained a fence that encloses the sump and complies with the requirements of Sections 11.48.010 - 11.48.050, Title 11 (Health and Safety) of the County Code. This provision shall not apply to sumps that are constantly and immediately attended while drilling, re-drilling, and reworking operations are proceeding as specified in Section 11.48.020 in Title 11 (Health and Safety) of the County Code.*

**Summary of Complaints:**

All sumps were cleaned out, filled in with clean soil and re-graded to surrounding topography in 2007. No new sumps have been installed or used for any oil field activities since the adoption of the CSD; no complaints regarding sumps have been received by the County.

**Summary of Issues Raised by the Public:**

As noted above, all oil field sumps have been cleaned out and filled in and no new sumps have been installed since the adoption of the CSD. The County has not noted any issues raised by the public regarding sumps.

**Analysis of Compliance and Effectiveness:**

As discussed above, all historical sumps that existed on site were cleaned out, filled in with clean soil, and re-graded to match the surrounding topography in 2007. No operator, including SPR, has installed or used sumps for any oil field activities since the adoption of the CSD. The use of bins and portable tanks, often called by the vendor name "Baker Tanks", is now common and standard practice in most oil and gas fields in California. These metal and plastic container structures have eliminated the need for the installation and use of in the ground sumps. The use of these portable structures has also eliminated the need for provision language requiring the clean out of sumps upon cessation of the associated drilling activity as the structures are not permanent and are moved from one job site to the next.

The requirement has not been activated to date because the oil field no longer contains sumps or sump fencing and the use of portable metal or plastic bins and tanks have replaced the need for them. It is recommended that the Operator continue the use of metal and or plastic bins and tanks consistent with standard industry practice. Eliminating the use of below-ground sumps with above-ground metal or plastic containment structures is considered to be an environmental benefit due to the fact that the oil, drilling mud and other fluids are confined to a better containment structure that is both easier to clean and remove from the drill site, and does not have the potential to contaminate surrounding soils.

**New Technology:**

As noted above, the use of below ground sumps has been widely replaced by metal or plastic bins and tanks for most oil and gas facilities in California. SPR does not use below-ground sumps at the oil field and continues the use of the portable bins and tanks as standard operating procedure for all drilling activities.

**Recommendations to Changes in Implementation:**

As previously discussed, the Inglewood Oil Field does not contain sumps and the use of sumps was discontinued prior to the adoption of the CSD. It is recommended that the Operator continue the practice of using above-ground bins, and no other changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

**4.16 P. WELL CELLARS**

*All well cellars shall be constructed in accordance with the most current American Petroleum Institute standards. In addition, the operator shall comply with the following provisions:*

*1. Cellar Fluids. Well cellars shall be kept free of all oil, water, or debris at all times. During drilling, re-drilling, and reworking, the cellar shall be kept free of excess fluids by a pump which discharges into a waste tank, mud pit, vacuum truck, or other approved disposal system.*

*2. Access to Multi-Well Cellars. All multi-well cellars exceeding three feet in depth and 25 feet in length shall have two means of entrance and exit and an additional exit for every 50 feet in length thereafter. At least one means of entrance or exit for all multi-well cellars of 25 feet in length shall be a stairway constructed to California Division of Industrial Safety standards.*

*3. Single-Cellar Covers. All single-cellars shall be covered with open grating and have no openings larger than three inches at any point. Covers shall be capable of supporting vehicle weight or guardrails shall be erected to prevent vehicle access.*

*4. Cellar Ladder Openings. All openings for ladders through grating shall be designed to allow exit from underside without obstruction and shall be kept free of storage of any type. Said openings shall not be less than 24 inches on either side.*

**Summary of Complaints:**

No complaints regarding the oil field well cellars have been received by the County.

**Summary of Issues Raised by the Public:**

There have been no issues raised by the public regarding well cellars.

**Analysis of Compliance and Effectiveness:**

The well cellars at the oil field are inspected annually by DOGGR and any time the associated well is re-worked, a DOGGR permit is required and thus reviewed. The cellars are kept free of fluid and debris and are inspected daily by operations staff. The well cellars are also checked periodically by the County ECC during site inspections. As noted in the discussion on CSD Provision 22.310.050.O, bins and tanks are used for all drilling, re-drilling and reworking activities

on the oil field; mud pits or sumps are no longer utilized. The oil field does not contain any multi-well cellars; all well cellars are of the single-well cellar type; therefore, subsection P.2 does not currently apply to any existing oil field structures.

All well cellars in the oil field are covered with an open grating and surrounded with fencing to prevent vehicle access. The well fencing includes signage depicting the name of the well per the requirements listed in CSD Provision 22.310.050.M.4. None of the wells require cellar ladder openings due to the shallow depth of the cellars.

Well cellars at the oil field meet current API standards as required and reviewed during DOGGR and County inspections, the provision is considered fully effective at this time, no further analysis is recommended.

**New Technology:**

As noted above, the well cellars on the oil field are required to meet the standards and specifications of the API. Therefore, as new technologies for well cellars are developed and adopted by the API; those technologies would be required by the CSD without a need for any specific provision language changes.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No recommendations in the CSD language are recommended at this time.

**4.17 Q. STORMWATER DRAINAGE MANAGEMENT**

*The operator shall comply with the following provisions:*

*1. Construction Storm Water Pollution Prevention Plan ("CWPPP"). The operator shall maintain and implement all provisions of a storm water pollution prevention plan ("SWPPP") that has been inspected by the Regional Water Quality Control Board and the county department of public works. The operator shall provide the director and the director of public works with a copy of the SWPPP, and any future modifications, revisions, or alterations thereof, or replacements therefore. The SWPPP shall be updated prior to new construction activities as required by the Regional Water Quality Control Board.*

*2. Spill Prevention, Control, and Countermeasure Plan ("SPCCP"). The Operator shall maintain and implement all provisions of a spill prevention, control, and countermeasure Plan ("SPCCP") which meets the requirements of the Local California Unified Program Agency and the United States Environmental Protection Agency. The operator shall provide the director and the fire chief with a copy of the SPCCP and any future modifications, revisions, or alterations thereof, or replacements therefore.*

*3. Hydrological Analysis. A site-specific hydrologic analysis shall be completed to evaluate anticipated changes in drainage patterns and associated increased runoff at the site for any new grading that results in the loss of vegetated, sandy, permeable ground areas, which could alter surface runoff at the site. The analysis shall be completed consistent with Standard Urban Stormwater Mitigation Plan regulations, as specified in the county department of public works*

*Hydrology Manual as amended. The hydrological analysis shall be submitted to the director of public works for review and approval. The new grading that required the hydrologic analysis shall not occur until approval of the analysis by the director of public works.*

**Summary of Complaints:**

A member of the public expressed concern via the oil field complaint process in February 2017 regarding stormwater drainage below the Vickers 1 basin in a Culver Crest neighborhood (Flaxton Street and Youngworth Road). The operator was discharging rainwater consistent with their CSD and Regional Water Quality Control Board permit requirements. The rainwater entered the storm drain system and then entered the street from a storm drain system street discharge point, sheet flowed down the street, and then reentered the system at a curb opening. The operator and ECC investigated the situation and determined the storm drain system was designed to flow onto the street and confirmed the water routing with the DPW. The subject storm drain system is in Culver City.

**Summary of Issues Raised by the Public:**

The County has not received any input from the public on the oil field SWPPP or SPCCP.

**Analysis of Compliance and Effectiveness:**



The oil field SWPPP is updated as needed and submitted to the RWQCB and the DPW for review. Recent versions of the SWPPP include the requirements and associated general permit (CAS000002) for compliance with the National Pollution Discharge Eliminations System (NPDES). Recent updates to the SWPPP have been submitted annually along with the Master Grading Plan, the current SWPPP is

dated June 2018. SPR utilizes an environmental consulting company with expertise in storm water management to assist with implementation of the provisions of the SWPPP and prepare the oil field for each storm season.

The *Spill Prevention, Control and Countermeasure Plan* (SPCCP), required under subsection Q.2, provides detail on the maintenance of tank and related equipment at the oil field which include inspection programs, corrosion prevention/corrosion monitoring techniques, and clean-up equipment. The Plan also includes potential spill scenarios for each tank with containment calculations documenting the adequacy of the containment structures. The Plan is updated every five years, current version dated July 2018; the most recent spill containment response training was completed on March 27, 2019.

The hydrologic analysis listed under subsection Q.3 has not occurred to date because no oil field projects have triggered the requirement. Projects at the oil field to date, as detailed and reviewed in the annual master grading plan submittals, have not resulted in enough disturbance

or loss of vegetated, sandy, or permeable ground areas that have altered surface runoff at the site. Therefore, this provision has not been triggered to date.

The provision is considered to be effective at this time, no further analysis is recommended.

**New Technology:**

Both the SWPPP and the SPCCP are reviewed by applicable regulatory agencies. As noted above, agencies involved in overseeing these plans include the County, RWQCB, the Local California Unified Program Agency and the United States Environmental Protection Agency. These evaluations allow for new technologies in storm water drainage management and spill control to be added to the subject plans as needed, and those new technologies can be required by the CSD through Plan changes and compliance and do not necessitate amendments to the CSD language.

**Recommendations to Changes in Implementation:**

The required storm water and spill control plans and measures are current and in place, therefore, no change in the implementation of the provision is recommended.

**Recommendations to Changes in CSD Language:**

The CSD language allows for review and revision of the subject plans through the oversight of the agencies listed above, thus the requirements of this provision can be updated as necessary; therefore, no changes in CSD language are recommended.

**4.18 R. WATER MANAGEMENT PLAN**

*The operator shall comply with all provisions of a water management plan that has been approved by the director and the director of public works. The plan shall include best management practices, water conservation measures, the use of a drip irrigation system, and shall include provisions for the use of surface water runoff in the retention basins for dust suppression and landscaping. The plan shall also address the availability of reclaimed water for use at the oil field. The water management plan shall be reviewed by the operator every three years to determine if modifications to the plan are required. The operator shall make changes to the plan if requested by the director or the director of public works. Any modifications to the water management plan shall be submitted to the director and the director of public works for review and approval. The water management plan shall include any elements requested by the director or the director of public works. In addition, the operator shall comply with the water conservation measures and reporting requirements specified in Sections 20.09.020 - 20.09.080, Title 20 (Utilities) of the County Code.*

**Summary of Complaints:**

No complaints associated with the water management plan for the oil field have been received by the County.

**Summary of Issues Raised by the Public:**

The public has not provided any input on the water management plan for the oil field.

**Analysis of Compliance and Effectiveness:**

The *Water Management Plan Inglewood Oil Field* was initially submitted in May 2009 and was formally approved by County Public Works on August 8, 2012 and the County DRP on September 13, 2012. The Plan includes water conservation measures for office, landscaping,

operations, and maintenance water uses. The Plan also includes a section on employee awareness to encourage water conservation. One of the main water conservation measures is the use of water contained in retention basins for dust suppression. This measure has been fully implemented as documented by the County ECC during periodic inspections. A pump and portable above-ground storage tank system is currently at use at the Dabney-Lloyd retention basin to supply water for dust control applications. Starting with the 2014/2015 rain season, the previous operator FM O&G installed temporary pumps and storage tanks at all the oil field retention basins to allow for recycling of storm water when feasible.

The CSD does not require submittal of water usage records, however, 2018 water use was obtained from the operator for this report at 15,242,000 gallons or approximately 41,760 gallons per day water use. The Baldwin Hills CSD EIR provided the average water use for 2006-2007 as 160,104 gallons per day, therefore, current water use at the oil field is one fourth the baseline level from the CSD EIR. The Plan has been submitted and approved as required and current water use is below previous levels, the provision is considered fully effective at this time.

**New Technology:**

The CSD provision language includes requirements for operator review of the Plan every three years to determine if modifications are required and for the operator to make changes to the Plan if requested by the director of DPW. In addition, the language also requires compliance with the water conservation measures as specified in the County Code. Therefore, as new technologies in water management are developed and new requirements are added to the County Code, the CSD provision allows for implementation of those new technologies as directed by the director of DPW or by reference to the County Code.

**Recommendations to Changes in Implementation:**

The Water Management Plan is approved and implemented as intended, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

**4.19 S. GROUNDWATER MONITORING**

*The operator shall develop, implement, and carry out a groundwater quality monitoring program for the oil field that is acceptable to the director and consistent with all requirements of the Regional Water Quality Control Board. Pursuant to the approved program, the operator shall install and maintain groundwater monitoring wells in the vicinity of each surface water retention basin, which is permitted by the Regional Water Quality Control Board. Such monitoring wells shall be completed to the base of the permeable, potentially waterbearing, alluvium, Lakewood Formation, and San Pedro Formation, and to the top of the underlying, non-water bearing Pico Formation, as determined by a California-certified professional geologist. The Regional Water Quality Control Board and the director shall be regularly advised of the results of such monitoring and shall be immediately advised if such monitoring indicates a potential problem.*

**Summary of Complaints:**

No complaints associated with the groundwater monitoring program for the Inglewood Oil Field have been received by the County.

**Summary of Issues Raised by the Public:**

Comments have been received at several CAP meetings regarding questions on the monitoring results and on arsenic levels in the monitoring data. Questions on the laboratory detection limits, laboratory quality assurance/quality check sample blanks, and how the monitoring results compare to the drinking water standard have also been noted by the public. Arsenic, because it is prevalent in the geology throughout the LA basin, is often detected in the monitoring wells at the oil field. Both the data questions and the arsenic issue have been discussed and have been resolved at past and recent CAP meetings.

**Analysis of Compliance and Effectiveness:**

The *Groundwater Monitoring Program and Work Plan Inglewood Oil Field Plan* was submitted in August of 2009. The Plan described the groundwater quality monitoring program including the site geology/hydrology, proposed monitoring well locations, the sampling and monitoring procedures, well installation method, data collection, and data quality assurance and control procedures. The Plan was approved by the RWQCB in September 2009 and by the County in November 2009. Monitoring wells were installed between January 2010 and March 2010 with monitoring reports starting the first quarter of 2010. Monitoring reports have been submitted quarterly to the RWQCB and the County since the monitoring effort began in early 2010.



Groundwater monitoring samples are analyzed for a variety of contaminants and compared to State Maximum Contaminant Levels (MCLs) for drinking water standards. Sampled contaminants include petroleum hydrocarbons, diesel range organics, benzene, toluene, ethyl benzene, xylenes (BTEX), Methyl Tert Butyl Ether (MTBE), metals, oxygen, nitrate, and nitrite. Results from the monitoring program for all sampled parameters to date are below the applicable MCL for drinking water standards except for arsenic. As noted above, naturally occurring arsenic is common throughout the LA basin geology. The groundwater sampling program has also determined that the water bearing zones at the oil field are discontinuous with each other and are discontinuous with the water supply aquifers in the Los Angeles Basin.

The groundwater monitoring program has been implemented and is ongoing with quarterly reports submitted to the RWQCB and the County as required. The provision is considered fully effective at this time.

**New Technology:**

The CSD provision language requires that the monitoring program be consistent with all requirements of the RWQCB. As new technologies in groundwater monitoring are reviewed and adopted by the RWQCB, the new technologies can be required pursuant to RWQCB direction.

**Recommendations to Changes in Implementation:**

No changes to the provision implementation are recommended.



**Recommendations to Changes in CSD Language:**

The groundwater monitoring program has been implemented with the required reports submitted to the RWQCB and the County. No change to the CSD language is recommended.

**4.20 T. FENCING**

*All portions of the oil field on which oil operations are conducted shall be enclosed with a fence compliant with DOGGR regulations codified at California Code of Regulations Title 14, Article 3, sections 1778 and 1779, or as may be subsequently amended by the State.*

**Summary of Complaints:**

The oil field is completely fenced with a chain-link type fence that meets the requirements of the CSD fencing provision; the County has not received any complaints on the facility fencing.

**Summary of Issues Raised by the Public:**

The oil field is completely fenced with a chain-link type fence that meets the requirements of the CSD fencing provision; no issues on the facility fencing have been raised by the public.

**Analysis of Compliance and Effectiveness:**

The CSD requirement references the California Code of Regulations, DOGGR regulations for oil field enclosures (fencing). The oil field is completely fenced with chain-link type of fencing. The DOGGR requirement for chain link fencing is as follows; *(1) fences shall be not less than 5 feet high and mounted on 1 1/4" diameter steel posts with at least three strands of barbed wire mounted at a 45-degree angle from the top of the fence, (2) the fence shall be constructed of chain link or other industrial-type fencing of not less than 11-gauge wire and of not greater than 2-inch nominal mesh, (3) supporting posts shall be securely anchored to the surface, spaced no more than 14 feet apart, and (4) Tension wires of at least No. 9 gauge coil spring wire, or equivalent, shall be stretched at the top and bottom of the fence fabric and shall be fastened to the fabric at 24-inch intervals, there shall be no aperture large enough to permit any child to crawl under.*

The DOGGR fencing requirement further lists criteria for gates and sump screening. Gates are required to be *of a structure substantially the same as the required fences and shall be kept secured when not attended by an adult.* The gates at the oil field are chain link and are constructed consistent with the chain link fencing structure. As discussed for CSD Provision 22.310.050.O, *Sumps*, the facility does not have sumps nor are sumps used for any current oil field activity thus the DOGGR requirement for sumps is not applicable.

The ECC has requested that fencing be inspected by the Operator on a regular basis to address vulnerable areas and ensure that breaches can be avoided. Overall, the chain link fencing at the Inglewood Oil Field meets the DOGGR requirements listed above, therefore the provision is effective at this time.

**New Technology:**

As listed above in the CSD Provision language, the requirement lists the DOGGR regulation as *may be subsequently amended by the State.* Therefore, if the regulation is amended to reflect new technologies or requirements in fencing, the new requirements will be incorporated into the CSD as needed.



**Recommendations to Changes in Implementation:**

The installed fencing at the Inglewood Oil Field meets the CSD provision requirements. Further, the fencing is periodically reviewed during the County ECC inspection process. With continued inspections by the operator and the ECC no additional implementation changes are recommended.

**Recommendations to Changes in CSD Language:**

The installed fencing at the Inglewood Oil Field meets the CSD Provision requirements. In addition, the requirement provides for amended language should the State regulations change; therefore, no changes in the CSD language are recommended.

**4.21 U. OIL FIELD CLEANUP AND MAINTENANCE**

*The operator shall maintain the site in a clean and orderly condition and shall comply with the following provisions:*

*1. Equipment Removal. All facilities that have reached the end of their useful economic life shall be properly decommissioned and removed from the oil field within one year. Areas not slated for future use shall be restored and revegetated within 90 days of termination of use, unless such restoration and revegetation would interfere with fire safety or access to oil operations.*

*2. Equipment Maintenance. All equipment, improvements, facilities, and other personal property or fixtures located on the oil field shall be maintained in good condition to the satisfaction of the director and the director of public works.*

*3. Site Debris and Vegetation. The operator shall keep the property free of debris and vegetation overgrowth to the satisfaction of the director. All outside storage of parts or equipment shall comply with Chapter 22.140.430 (Outdoor Storage).*

**Summary of Complaints:**

No complaints regarding the cleanup and maintenance of the Inglewood Oil Field have been received by the County.

**Summary of Issues Raised by the Public:**

Input on equipment removal, and the equipment removal plan required by CSD Provision 22.310.120.N, was received as part of the Settlement Agreement dated July 15, 2011 negotiated between concerned public parties, the County and PXP (now FM O&G). The Unused or Abandoned Equipment Removal Plan Inglewood Oil Field was submitted and implemented as required in 2009. Term 12 of the Settlement Agreement requires the operator to update the Plan periodically should equipment not included in the 2009 Plan become unused or abandoned. The Plan was most recently updated in December 2012. The public has not provided any input on the oil field clean up or maintenance at the oil field.

**Analysis of Compliance and Effectiveness:**

The *Unused or Abandoned Equipment Removal Plan Inglewood Oil Field* describes the equipment removal activities completed since the adoption of the CSD. Figure 1 of the Plan provides a table listing 64 pieces of equipment that were removed in 2008 and 2009. The table also includes four tanks that were removed in 2012 documenting that the update of the Plan required by the Settlement Agreement has been implemented. The Plan includes removal

procedures to ensure equipment is removed with appropriate removal measures for safety and to minimize environmental impact.

Equipment at the oil field is inspected and maintained by the field operations staff with operators completing rounds of the facility daily. All oil field equipment, and the associated maintenance of that equipment, is tracked and scheduled with a vendor-supplied computer-based maintenance management program. The operator also conducts annual internal safety audits of the facility which provide for review and inspection of the oil field equipment. There have been no issues with equipment maintenance requiring County DRP or Public Works involvement since the adoption of the CSD.

Section 22.140.430 of the County Code stipulates that a property cannot be used for outside storage or display of raw materials, equipment or finished products unless the storage meets certain Code requirements. Outside storage of equipment at the oil field is consistent with this requirement and typical for an oil and gas operation. Examples of outside equipment storage include the pipe rack yard and hazardous materials area.

The operation of the oil field meets the requirements of the site cleanup and equipment maintenance stipulations of this provision. The amended requirement for periodic updating of the Equipment Removal Plan ensures equipment no longer in use will be removed from the facility in a timely fashion. Equipment at the oil field is maintained and stored as required, therefore, the provision is considered fully effective at this time and no further analysis is recommended.

**New Technology:**

The Equipment Removal Plan includes measures for the safe and environmentally beneficial removal of equipment at the oil field. The Plan is updated and reviewed periodically by the County which will allow for new technologies associated with equipment removal to be implemented as they are developed.

**Recommendations to Changes in Implementation:**

The requirements for site cleanup and equipment maintenance of this provision have been implemented. Further, the periodic update of the Equipment Removal Plan required by the Settlement Agreement strengthens the intent of the requirement. No changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

As noted above, the Settlement Agreement augmented the existing CSD language to require periodic updates to the Equipment Removal Plan. No changes in the CSD language are recommended.

**4.22 V. SECURITY**

*All unmanned entrances to the oil field shall be equipped with sliding gates which shall be kept closed at all times except when authorized vehicles are entering or leaving the oil field. The operator shall have a security guard on duty 24 hours per day.*

**Summary of Complaints:**

The Inglewood Oil Field is completely fenced with a chain-link type fence that meets the requirements of the CSD fencing provision with sliding gates at all unmanned entrances. The County has not received any complaints regarding security at the Inglewood Oil Field.

**Summary of Issues Raised by the Public:**

The County has not received any concerns regarding security at the Inglewood Oil Field.

**Analysis of Compliance and Effectiveness:**

CSD requirement 22.310.050.T requires the oil field facility to be enclosed by fencing that meets DOGGR regulations. The gates associated with the facility fencing are also required to meet the DOGGR regulations for oil field enclosures. All gates at the oil field are consistent with these regulations and all unmanned entrances are equipped with the required sliding type gates. Current security at the oil field includes a 24-hour guard at the main entrance gate to the field off Stocker Street and a gated entrance with a call box to the field and offices off of Fairfax Street. All vehicles must check in with the guard and sign in prior to gaining access to the oil field. The guard shack facilities have land line telephone access to the main office building to obtain authorization clearance to allow access for visitors not previously cleared for entrance. The oil field security provisions are inspected annually by DOGGR.

The unmanned gates and site security at the oil field meet the requirements of the CSD provision and no significant issues regarding the security of the facility have occurred during this review period. This provision is considered fully effective at this time and no further analysis is recommended.

**New Technology:**

As noted above, CSD provision 22.310.050.T, requires that facility gates meet DOGGR regulations as *may be subsequently amended by the State*. Therefore, if the regulation is amended to reflect new technologies with regards to gates, the new requirements will be incorporated into the CSD provision by reference.

**Recommendations to Changes in Implementation:**

The unmanned gates and site security at the oil field meet the requirements of the CSD provision; no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The unmanned gates and site security at the Inglewood Oil Field meet the requirements of the CSD provision and no significant issues regarding the security of the facility have occurred, therefore, no changes in the CSD language are recommended.

**4.23 W. VEHICLE PARKING**

*Vehicular parking shall comply with Chapter 22.112 (Parking).*

**Summary of Complaints:**

The parking facilities at the Inglewood Oil Field meet both the requirements of the CSD provision and the demand of the SPR oil field operations. The County has not received any complaints with regards to vehicle parking.

**Summary of Issues Raised by the Public:**

All vehicle parking for SPR oil field operations occurs on-site and does not impact the public; no issues relating to vehicle parking have been raised by the public.

**Analysis of Compliance and Effectiveness:**

The CSD requirement references the parking requirements of the LA County Code. The applicable requirements for an industrial land use are detailed in Section Table 22.112.070-A as follows; *one space per 500 square feet and 1 space per vehicle directly used for business.*

The oil field contains sufficient parking for all employee, subcontractor, visitor, and heavy equipment vehicles. Marked parking spaces at the office building and warehouse areas are consistent with County code requirements. No vehicles associated with oil field operation park off-site; therefore, parking of vehicles for oil field operations does not impact any public parking facility. This provision is considered fully effective at this time and no further analysis is recommended.

**New Technology:**

The vehicle parking capacity at the oil field is sufficient and meets County code requirements, a discussion on new technology is not applicable.

**Recommendations to Changes in Implementation:**

This requirement has been appropriately implemented, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

**4.24 X. SANITATION**

*The operator shall comply with the following provisions:*

*1. Garbage and Refuse. The oil field shall be maintained in a clean, sanitary condition, free from accumulations of garbage, refuse, and other wastes.*

*2. Toilets and Wash Facilities. Sanitary toilet and washing facilities shall be installed at any site where personnel are permanently stationed. Portable facilities shall be provided wherever crews are temporarily employed. Such facilities shall be maintained in a clean and sanitary condition at all times.*

**Summary of Complaints:**

No complaints associated with garbage and refuse at the oil field have been received by the County. Oil field toilets and wash facilities are not open to the public.

**Summary of Issues Raised by the Public:**

No issues regarding garbage and refuse at the Inglewood Oil Field have been raised by the public. Oil field toilets and wash facilities are not open to the public.

**Analysis of Compliance and Effectiveness:**

Garbage and refuse are picked up and removed weekly by a subcontractor garbage collection company. Garbage bins are located at the office, the warehouse, and other locations throughout the oil field.

Permanent toilet and wash facilities are located at the office building, the warehouse, the gas plant, the “halfway house” across from the gas plant, and at two modular buildings used by sub-contractors. The restroom facilities are maintained by a sub-contractor janitorial service. Portable facilities are located throughout the field and moved as needed, the portable restrooms are maintained by the subcontractor providing the units.

The provision is considered fully effective at this time, no further analysis is recommended.

**New Technology:**

New technologies in garbage and refuse collection such as improvements in the collection trucks would be implemented by the subcontractor providing the service as required by regulations outside the scope of the CSD.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

**4.25 Y. STORAGE OF HAZARDOUS MATERIALS**

*The operator shall comply with all provisions of a hazardous materials business plan that has been submitted to the fire chief. The operator shall deliver to the fire chief for review and approval an updated hazardous material business plan on an annual basis. This plan shall provide the location of where hazardous materials are stored at the oil field. Hazardous materials shall be stored in an organized and orderly manner and identified as may be necessary to aid in preventing accidents and shall be reasonably protected from sources of external corrosion or damage to the satisfaction of the fire chief.*

**Summary of Complaints:**

No complaints associated with the Hazardous Materials Business Plan for the Inglewood Oil Field have been received by the County.

**Summary of Issues Raised by the Public:**

No issues regarding the Hazardous Materials Business Plan for the Inglewood Oil Field have been raised by the public.

**Analysis of Compliance and Effectiveness:**

The Hazardous Materials Business Plan (HMBP) for the oil field is submitted to the Fire Department for review and approval on an annual basis as required. Hazardous materials at the oil field are primarily stored in a location near the facility pipe yard. The storage area consists of a concrete pad with secondary containment to capture potential spills. Hazardous materials are organized by chemical type and containers are labeled per Department of

Transportation (DOT) and National Fire Prevention Association (NFPA) regulations. Hazardous materials in small amounts are also used in various locations throughout the field and are placed in individual secondary containment bins. The hazardous materials storage area is periodically inspected by the Fire Department.



On September 17, 2014 LA County Fire and the DRP issued the operator, FM O&G at the time, a Notice of Violation (NOV) for inaccurate and missing information on the HMBP resulting from an inspection completed by LA County Fire. The HMBP data was subsequently corrected and approved by the Fire Department and the DRP NOV was cleared by the DRP on October 22, 2014. No other compliance issues have occurred regarding the storage of hazardous materials during this review period. The provision is considered fully effective at this time, no further analysis is recommended.

**New Technology:**

The Hazardous Materials Business Plan is submitted to, reviewed, and approved by the Fire Department annually. As new technologies are developed in the storage of hazardous materials the Fire Department can request implementation of those new technologies through the Business Plan review and approval process.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

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**4.26 Z. DRILLING, REDRILLING, AND REWORKING OPERATIONS**

*The operator shall comply with all of the following provisions:*

*1. DOGGR Regulations. All DOGGR regulations related to drilling, redrilling, and reworking operations.*

*2. Number of Drilling and Redrilling Rigs. No more than three drilling or redrilling rigs shall be present within the oil field at any one time.*

*3. Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan. Before the end of each calendar year, the operator shall develop and deliver to the director an annual drilling, redrilling, well abandonment, and well pad restoration plan, which shall describe all drilling, redrilling, well abandonment, and well pad restoration activities that may be conducted during the upcoming calendar year. Drilling and redrilling shall be scheduled to avoid over concentration of such activities in that year in any one area if located near a developed area. The operator may at any time submit to the director proposed amendments to the then current*

*annual plan. No drilling, redrilling, or abandonment activity may be commenced unless it is described in a current annual plan (or an amendment thereto) which has been approved by the director. The annual plan (and any amendments) shall be provided to the CAP for review and comment. All comments on the annual plan from the CAP shall be submitted to the director in writing, and, if timely submitted, will be considered as part of the director's review and approval. The director shall complete the review of the annual plan (and any amendments) within 45 days of receipt and shall either approve the annual plan or provide the operator with a list of deficiencies. The annual plan shall comply with the provisions of this subsection, and shall include the following:*

- a. The maximum number of wells proposed to be drilled or redrilled;*
- b. Approximate location of all wells proposed to be drilled or redrilled;*
- c. Approximate location of all proposed new well pads, including their size and dimensions;*
- d. Estimated target depth of all proposed wells and their estimated bottom hole locations;*
- e. A discussion of the steps that have been taken to maximize use of existing well pads, maximize use of redrilled wells, and maximize the consolidation of wells;*
- f. Location of all proposed well abandonments, if known, in accordance with DOGGR integrity testing program of idle wells;*
- g. Location of all well pads proposed to be abandoned and restored;*
- h. A proposed schedule and phasing of the drilling, redrilling, well abandonment, well pad abandonment, and restoration activities;*
- i. A discussion of the latest equipment and techniques that are proposed for use as part of the drilling and redrilling program to reduce environmental impacts; and*
- j. A topographic vertical profile showing proposed location of new wells that reflects local terrain conditions and that addresses the potential visibility of existing and proposed wells and other production facilities from residential and recreation areas.*

*4. Drill Rig Engines. All engines used for drilling and redrilling operations shall be operated by muffled internal-combustion engines or by electric motors.*

*5. Fire Safety Regulations. All drilling, redrilling, and reworking shall be in conformance with applicable fire and safety regulations.*

*6. New Technology. Proven reasonable and feasible technological improvements which are capable of reducing the environmental impacts of drilling and redrilling shall be considered as they become, from time to time, available.*

*7. Derricks and Portable Masts. All derricks and portable masts used for drilling, redrilling, and reworking shall meet the standards and specifications of the American Petroleum Institute as they presently exist or as may be amended.*

8. *Equipment Removal.* All drilling and redrilling equipment shall be removed from the site within 90 days following the completion of drilling or redrilling activities unless the equipment is to be used at the oil field within five days for drilling or redrilling operations.

9. *Drill Site Conditions.* All drilling sites shall be maintained in a neat and orderly fashion.

10. *Belt Guards.* Belt guards shall be required over all drive belts on drilling, redrilling, and reworking equipment. Guarding shall be as required by Title 8 of the California Code of Regulations, section 6622, or as may be subsequently amended.

**Summary of Complaints:**

The County has received complaints on several different issues that have the potential to be associated with drilling, redrilling and reworking operations at the oil field, however, no drilling has occurred at the oil field since June 2014. The complaints included issues with odor, noise, vibration, and property damage. Discussion of these issues is included in the applicable analysis section of this Periodic Review.

**Summary of Issues Raised by the Public:**

Aside from the comments on the annual drilling plans, no significant issues regarding drilling have been received by the County during this review period. As noted earlier, no drilling has occurred at the oil field since June 2014.

Hydraulic fracture well enhancement techniques are not in use at the oil field at this time nor are they proposed in any of the Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plans for this review period. In addition, the Operator has committed to providing advance notice of any potential future hydraulic fracturing that could occur at the field.

***Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan***

The public provided input on the 2014 and 2015 *Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plans* that are submitted to the County on an annual basis as required by this provision (no public comments were received on those plans submitted in 2016 – 2018). For both the 2014 and 2015 Plans, the public requested a review of the feasibility analysis of using a natural gas-powered rig the operator presented in the plan. The County review of the analysis concurred that that the use of a natural gas rig was infeasible or more impactful than the current proposed operations. The other comment on the plans involved the extensive use of graphics in the viewshed analysis of the report; the County concurred, and the graphics are no longer required as was discussed in the first Periodic Review.

***The 2011 Settlement Agreement***

The Settlement Agreement resulted in additional documentation requirements for wells that involve slant drilling and for wells located in certain mid-zone and shallow depth locations. Operations that meet the criteria for these types of wells must be detailed in a supplemental review section of the annual drilling Plan. Other requirements included revising the limit on the number of drilling rigs, as discussed below, clean technology for drilling equipment, and increasing the length of cement well plugs. Well plugs are discussed in the analysis of Provision 22.310.050.GG, *Well and Well Pad Abandonment*.

**Analysis of Compliance and Effectiveness:**

Subsection Z.1 requires that all well activities related to drilling, redrilling, and reworking operations meet the applicable DOGGR regulations. Drilling, redrilling, and reworking and



operations at the oil field are regularly inspected by DOGGR to ensure compliance with these State regulations. The DOGGR inspections often include specific review for the drilling rig blow out preventer (BOP) system. The Operator is required to notify DOGGR to witness BOP function for all permitted new or redrilled production and injection wells.

The Settlement Agreement revised the provision subsection regarding the allowable number of drilling and redrilling rigs at the oil field. The original provision listed a maximum of three of these rig types; the Settlement Agreement limits that number to two. Current and historic operations since the applicability of the CSD have had a single drilling rig onsite; however, the 2014 drilling Plan contained a drilling schedule set up for two such rigs, however, a single drill rig was used during 2014. At no time since the adoption of the CSD has the oil field had three drilling and redrilling rigs operating at the same time.

The *Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan* has been submitted to the County on an annual basis as required. The Plan is reviewed and approved prior to the initiation of drilling activities for the given year. The Plans have also been provided to the CAP for comment consistent with this provision. County review of the plans includes consideration of input received from the CAP. These annual drilling plans must contain the information required under subsections Z.3.a. through 3.j to be approved by the County. Annual plans have been amended as necessary, as allowed by subsection Z.3 to reflect changes that may occur during the drilling year. The annual Plans for the calendar years 2014 through 2018 were approved by the County. The plans are available at the Inglewood Oil Field web site at [www.inglewoodoilfield.com](http://www.inglewoodoilfield.com).

Drill rig engines used at the oil field are properly muffled as required. Fire and safety regulations and orderly drill site conditions are followed at all drilling, redrilling, reworking sites in the oil field; compliance for these requirements is checked periodically during DOGGR and County ECC inspections. As noted above the Operator is required to notify DOGGR for specific permitted well operations. The County inspections and permits document compliance with the rig standards for derricks, portable masts and belt guards as required under subsections Z.7 and



10. New technology for reducing the environmental impacts of drilling and redrilling is discussed in the annual drilling plans submitted to the County for review prior to each drilling activity year. Natural gas-powered drill rigs have been discussed in recent drilling plans, but this technology has not been proven feasible to date due to the lack of available rigs using this technology. In addition, gas rigs are typically significantly taller and would have a bigger

footprint than a standard rig. Air emissions were also found to have a negligible benefit when compared with using the conventional rigs with the CSD mandated emission controls.

Because the drilling, redrilling, and reworking rigs at the oil field are provided and operated by sub-contractors to SPR, these rigs are not idle and are removed from the oil field pursuant to subsection Z.8 if no longer scheduled for use on the oil field.

The number of wells drilled and redrilled is limited on an annual and overall project basis by the conditions of Provision 22.310.080.A, *Ministerial Site Plan Review Required*. The drilling limits prescribed in the CSD were revised by the Settlement Agreement; please see the analysis for Provision 22.310.080 for a discussion on the well limits for the oil field.

It should be noted here that hydraulic fracture well enhancement techniques are not in use at the oil field at this time nor are they proposed in any of the Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plans for this review period. In addition, the Operator has committed to providing advance notice of any potential future hydraulic fracturing that could occur at the field.

The provision is considered fully effective at this time, no further analysis is recommended.

**New Technology:**

Subsection Z.6 requires that reasonable and feasible technological improvements capable of reducing the environmental impacts of drilling and re-drilling activities be considered as they become available. The *Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan* includes a discussion on applicable new technologies with this Plan submitted to the County for review. See discussion for Provision 22.310.050.B for information on CARB oil rig engine technology and emissions requirements.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

**4.27 AA. PROCESSING OPERATIONS**

*The operator shall comply with the following provisions:*

*1. Limits on Processing Operations. Unless otherwise expressly required by DOGGR, the only processing operations permitted at the well site shall be the dehydration of oil and gas produced from the well; the storage, handling, recycling, and transportation of such materials; and those processing operations required for water injection purposes.*

*2. Refining. No refining shall be conducted within the oil field.*

*3. Well Pump Motors. All well pumping units shall be operated by electric motors.*

*4. Well Pumps. Downhole submersible pumps and low-profile pumping units for production wells must be used wherever feasible.*

5. *Removal by Pipeline Only.* All oil, gas, and other hydrocarbons produced from any well in the oil field shall be shipped and transported through pipelines, except in case of an emergency or when access to a pipeline becomes unavailable. Excluded from this requirement are propane and other related natural gas liquids that are in amounts in excess of what can be blended into the pipeline. Should any pipeline through which oil or gas is currently transported become unavailable for the safe transportation of said products due to maintenance problems with the pipeline, or lack of sufficient capacity within the pipeline to handle the volume of oil and gas needing transportation, or because the owner or operator of such pipeline elects to discontinue transporting oil or gas through such pipeline, then the operator shall within 180 days of the date the existing pipeline becomes unavailable, seek to acquire a private right of way or easement, or shall file an application for a right of way, easement, encroachment permit, or franchise for the construction of a replacement pipeline and shall diligently prosecute such application until such pipeline is completed. During any emergency situation, or during such time as any existing pipeline becomes unsafe or unavailable, oil and gas may be transported by truck until the emergency situation is resolved or until a replacement pipeline shall be permitted and constructed in compliance with all applicable laws and regulations.

6. *Pipelines.* The operator shall comply with the following provisions:

a. *New pipelines that remove oil or gas from the oil field shall be buried below the surface of the ground;*

b. *All pipelines which are not enclosed within a fence shall be placed underground or covered with materials approved by the fire chief. Said covers shall be maintained in a neat, orderly, and secure manner;*

c. *Any and all water or brine produced during pipeline construction shall either be injected in accordance with DOGGR requirements, or disposed of in accordance with other local, State or federal regulations;*

d. *New pipeline corridors shall be consolidated with existing pipelines or electrical transmission corridors where feasible; and*

e. *Upon completion of pipeline construction, the site shall be restored to the approximate previous grade and condition.*

7. *Active Pipeline Plot Plan.* The operator shall submit to the fire chief a plot Plan depicting the approximate location of all active pipelines regulated by the United States Department of Transportation or California State Fire Marshall owned by the operator that are located outside the outer boundary line, including waste water, and trunk and gathering lines to transport oil or petroleum products. The plot Plan shall be submitted within 30 days of the installation of any new pipelines or the relocation of an existing pipeline.

8. *Machinery Enclosures.* The operator shall maintain enclosures around machinery with moving parts consisting of a fence, screening, or housing. Said enclosures shall be installed in compliance with Section 11.16.020, Title 11 (Health and Safety) of the County Code.

9. *Opening Protections.* The operator shall cap, close, or protect the openings in all oil wells, test holes, and similar excavation in compliance with Section 11.54.010, Title 11 (Health and Safety), of the County Code.

**Summary of Complaints:**

No complaints associated with the requirements on the processing operations at Inglewood Oil Field have been received by the County.

**Summary of Issues Raised by the Public:**

No issues specific to the requirements on the processing operations at the oil field have been raised by the public.

**Analysis of Compliance and Effectiveness:**

The processing operations at Inglewood Oil Field follow the requirements of this provision. The only processing occurring at the oil field is associated with the dehydration of oil and gas; the storage, handling, recycling, and transportation of those materials; and water injection operations. The oil field does not need to process hydrogen sulfide or other impurities prior to transportation to offsite refineries.

All well pump motors at the oil field are powered electrically; the field does not have any internal combustion engine well pump motors. Down hole submersible pumps require specific engineering and geologic conditions to be feasible. Specifically, the amount of sand in the formation is the primary determining factor in the use of submersible pumps because high levels of sand cause significant deterioration of the pump mechanisms. As of May 2019, 113 well pumps out of the total of 442 producing wells (25.6%) are using submersible pump technology. The oil field does not currently have any low-profile pumping units in operation. All oil, gas, and other hydrocarbons produced in the oil field are shipped and transported via pipelines and all natural gas liquids are blended into the oil and thus transported by pipeline. No trucking offsite of oil or gas occurred between the years 2014 and 2018.

No new pipelines that transport oil or gas from the oil field have been constructed since the adoption of the CSD. As noted in the discussion regarding CSD Provision 22.0310.050.T regarding oil field fencing, the oil field is completely fenced in with chain link fencing that meets the DOGGR requirements, thus all oil field pipelines are also enclosed by a fence.

All water or brine generated at the oil field is injected in accordance with DOGGR requirements, new injection wells are subject to review through the annual drilling Plan submittal to the County and the DOGGR Area of Review (AOR) process. Pipeline construction within the oil field is consolidated to the maximum extent feasible in existing pipeline routes and corridors. Pipeline corridors are returned to pre-existing grade and condition upon completion of construction consistent with the Oil Field Master Grading Plan. The Active Pipeline Plot Plan was submitted to the Fire Department on December 9, 2009 and has not been required to be updated to date.

Machinery enclosures and openings associated with wells, test holes, and excavations are inspected by oil field operators during daily rounds. This equipment is also reviewed annually during safety audits performed by the operator and periodically inspected by the County ECC. The equipment at the oil field complies with the referenced County code requirements under Title 11 for health and safety requirements for hazards. Maintenance, safety inspections, and safety audits of this equipment are implemented consistent with the Safety, Inspection, Maintenance, and Quality Assurance Program (SIMQAP) as required by CSD Provision 22.310.060.C.

The provision is considered fully effective at this time, no further analysis is recommended.

**New Technology:**

Any new pipelines that transport oil or gas offsite from the oil field would require permits from local and State regulatory agencies. The assessment and potential implementation of new technology in pipelines or pipeline construction would be part of the review and approval process of the pipeline permit applications. The machinery enclosure and opening protection requirements outlined in subsections AA.8 and 9 above; are linked to County Code requirements, updates to those requirements are therefore incorporated by reference to the CSD.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

**4.28 BB. WELL REWORKING OPERATIONS**

*The operator shall comply with the following provisions:*

- 1. DOGGR Regulations. The operator shall comply with all DOGGR regulations related to well reworking operations.*
- 2. Number of Reworking Rigs. No more than eight reworking rigs shall be present within the oil field at any one time, unless an emergency condition requires additional Reworking rigs. This does not include equipment used for well maintenance or well abandonment.*
- 3. Hours of Operation. With exception of emergencies, well reworking operations shall not be allowed after 7:00 p.m. or before 7:00 a.m., nor on Sundays or legal holidays.*
- 4. Specifications. Reworking rigs shall meet the standards and specifications of the American Petroleum Institute.*
- 5. Equipment Removal. Reworking rigs shall be removed from the oil field within seven days following the completion of reworking operations unless such rig will be used on another well at the oil field within five days.*

**Summary of Complaints:**

The County has received complaints regarding noise associated with rig operations at the oil field. The most common complaint is noise from pipe sections banging against each other. Two complaints regarding noise were identified with maintenance rig operations during the 2014 through 2018 compliance period.

**Summary of Issues Raised by the Public:**

The public has noted the observation of too many rigs in one area in the past, however, this has not been an issue during the 2014 to 2018 compliance period.

**Analysis of Compliance and Effectiveness:**

Wells associated with reworking operations require a permit from DOGGR and thus must meet the applicable well reworking requirements. It should be noted that these well activities are not

part of the *Annual Drilling, Redrilling, Well Abandonment, and Well Restoration Plan*; the permitting is a separate process completed directly with DOGGR with permits copied to the County. Compliance with the number of reworking rigs at the oil field is documented by weekly email updates to the County listing the number of reworking rigs and the well location of the work. This data is confirmed by periodic County ECC inspections.

Standard policy for the operation of reworking rigs operation is daylight hours only. Operation during non-daylight hours only occurs when necessary to complete a critical task or for an emergency. Reworking rigs are not operated outside 7:00 am to 7:00 pm or on Sundays or legal holidays consistent with the CSD requirements. The reworking rigs at the oil field are provided and operated by a sub-contractor. The rigs must have a valid Department of Motor Vehicles license and meet the specifications of the American Petroleum Institute (API) to operate in California. The reworking rigs are removed from the field to be used elsewhere by the sub-contractor unless scheduled for use at another well in the oil field.

The provision is effective at this time, no further analysis is recommended.

**New Technology:**

As noted above, the well reworking rigs are required to meet the standards and specifications of the API. Therefore, as new technologies are developed and adopted by the API, those technologies would be consequently required by the CSD. See discussion for Provision 22.310.050.B for information on CARB oil rig engine technology and emissions requirements.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended, no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

**4.29 CC. TANKS**

*The operator shall comply with the following provisions:*

*1. New Tank Specifications. All new tanks and appurtenances shall be designed, constructed, installed, and maintained in accordance with current County Fire Code, American Petroleum Institute, DOGGR, California Division of Industrial Safety, Environmental Protection Agency Standards, applicable provisions of Title 14 of the California Code of Regulations section 1774, and applicable CalARP Program requirements.*

*2. Setbacks. No new storage Tank, excluding a replacement tank, shall be constructed closer than 500 feet from any developed area, or closer than 200 feet from a public road. No building shall be constructed within 50 feet of any oil storage tank.*

*3. Vapor Recovery. Oil, wash, and produced water tanks shall be vapor tight and shall be equipped with a vapor recovery system.*

*4. Specifications for New Tank Piping, Valves, Fittings, and Connections. All new tank piping, valves, fittings, and connections including normal and emergency relief venting, shall be installed and maintained in accordance with current American Petroleum Institute standards to the satisfaction of SCAQMD and DOGGR.*

5. *Detection of Tank Bottom Leaks.* The operator shall design, implement, and comply with a program, approved by the fire chief, for controlling and detecting tank bottom leaks on all tanks at the oil field. The operator may use a combination of methods including but not limited to diversion walls, dikes, tank foundations of concrete or gravel, and a tank bottom leak detection system in compliance with Title 14 of the California Code and Regulations section 1773, or subsequently enacted State regulations regarding tank bottom leaks.

**Summary of Complaints:**

As discussed in CSD 22.310.050.B, on November 22, 2108 a tank at the Inglewood Tank Battery overflowed due to the failure of a level controller. A level controller is a device that, when working properly, can control the operation of one or more pumps that move fluid through a tank or system of tanks. In this case, the controller failed, and a pump was not activated resulting in an overflow of produced water into the secondary containment area of the tank area. Approximately 630 gallons (15 barrels) of oil/water mixture was spilled over a 15 to 20-minute time frame into the secondary containment area causing multiple odor complaints from the community, the odor complaints are discussed above for CSD provision 22.310.050.B. The County follow up of the tank overflow and subject level controller is discussed below.

**Summary of Issues Raised by the Public:**

No issues other than the tank overflow discussed above regarding the operation of tanks at Inglewood Oil Field have been received by the County during this review period.

**Analysis of Compliance and Effectiveness:**

Two new tanks have been constructed during this 2014 through 2018 review period. Both tanks were installed at the Water Plant in 2015. Construction of the new tanks required County building and land use permits and a South Coast Air Quality Management permit for the vapor recovery system. The permitting of these tanks included the tank piping, valves, fittings, and connections. Neither tank was built within the setback criteria described in subsection CC.2. No buildings have been constructed within 50 feet of



an oil tank. Thus, the tanks were built pursuant to the agency requirements for new tank specifications outlined in subsections CC.1 and 4 above.

All oil, wash, and produced water tanks at the Inglewood Oil Field are vapor tight and are equipped with a vapor recovery system; this requirement is enforced and documented by annual and periodic inspections by the South Coast Air Quality Management District and by periodic ECC inspections. The level controller failure on November 22, 2108 discussed above resulted in a SCAQMD Notice of Violation (NOV) for Rule 402, Nuisance, due to the number of complaints due to the odor release from the released fluids. As discussed above for Provision 22.310.050.B, Air Quality and Public Health, the County completed an engineering analysis which documented the level of odor and health issues from the tank overflow incident. The follow-up investigation by the County also required the operator to install a second, redundant, alarm system to the tank to prevent a future overflow incident. The second system, a high-level alarm, was installed and tested in May 2019 with the County ECC observing a test of the system on May 15, 2019. The high-level alarm provides notification to the operator via a visual

red light at the tank farm, a notice on the tank farm control panel and an alert sent to field operators via cellphones. Other tanks at the oil field with similar VOC gas levels are under review for similar additional alarm sensors.

As outlined in the Safety, Inspection, Maintenance, and Quality Assurance Program (SIMQAP) required under Provision 22.310.060.C, all tanks at the Inglewood Oil Field have a program to detect tank bottom leaks. The SIMQAP and leak detection program are required to be reviewed and approved for compliance with Title 14 of the California Code of Regulations and other State regulations. The leak detection for all tanks at the oil field consists of either direct view monitoring of the exterior surface and bottom or using tank foundations of either concrete or gravel. A Tank Leak Detection and Containment Plan was approved by County Fire on 2/18/10. The *Annual Well Increase Evaluation, December 2011*, also confirmed that the required tank leak detection measures are in place.

The provision is considered fully effective at this time; no further analysis is recommended.

**New Technology:**

All new tanks require permits from County Departments of Public Works and Regional Planning and from the South Coast Air Quality Management District. New technologies in the construction and monitoring of oil field tanks would be part of the review and approval process for the permitting of those tanks. Therefore, any new technologies applicable to oil field tanks can be required pursuant to the subject agency permitting requirements and would be consequently incorporated into the CSD by reference.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

**4.30 DD. WELL PRODUCTION AND REPORTING**

*The operator shall deliver annual production reports to the director and the fire chief. The reports shall provide the following information:*

- 1. A copy of all DOGGR Forms 110 and 11 OB submitted during the previous 12 months.*
- 2. Number and mapped location of wells drilled or redrilled, including well identification numbers.*
- 3. Number and mapped location of water injection wells, including well identification numbers.*
- 4. Number and mapped location of idled wells, including well identification numbers and the date each well was idled.*
- 5. Number and mapped location of abandoned wells, including date each well was abandoned and/or re-abandoned.*
- 6. Any additional information requested by the director or the fire chief.*



**Summary of Complaints:**

No complaints regarding the well reports required by this provision have been received by the County.

**Summary of Issues Raised by the Public:**

The public has not raised any issues specific to this CSD requirement; the public does provide comment on the oil field wells through the public outreach provisions of the CSD by commenting on the *Annual Drilling, Redrilling, Well Abandonment and Well Restoration Plan*. Community Advisory Panel (CAP) members have requested to have information on the start and end date for the drilling of each well. Information summarizing the start and end dates of each well drilled for the previous quarter has been recently provided verbally by the County at the CAP meetings.

**Analysis of Compliance and Effectiveness:**

The reports requested by this provision have been submitted annually to the County and Fire Chief as required. The forms listed under subsection DD.1 are submitted to DOGGR monthly and are compiled for the annual submittal to the County. The County submittal consists of three document packets; Well and Production Report Maps, Well and Production Report Production Forms, and Well and Production Report Injection Forms. These documents are available at the oil field web site at [www.inglewoodoilfield.com](http://www.inglewoodoilfield.com).

Projected location of wells drilled or redrilled is provided in the Annual Drilling Plan submitted according to CSD Provision 22.310.050.Z. The provision is considered fully effective at this time and no further analysis is recommended.

**New Technology:**

This CSD provision is not directly linked to technology; however, as new technologies in well reporting are implemented by DOGGR and added to the reporting forms, the new reporting information would be incorporated into the CSD provision by reference.

**Recommendations to Changes in Implementation:**

The provision has been implemented and is considered fully effective at this time; therefore, no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The provision is considered fully effective at this time, and no changes to the CSD language are recommended.

**4.31 EE. IDLE WELL TESTING AND MAINTENANCE**

*The operator shall comply with Title 14 of the California Code of Regulations section 1723.9 regarding testing and maintenance of idle wells, or subsequently enacted State regulations regarding testing and maintenance of idle wells. The operator shall carry out all additional tests, remedial operations, and mitigation measures required by DOGGR if any idle wells do not meet the test standards.*

**Summary of Complaints:**

This provision is administrated and regulated by DOGGR. The County has not received any complaints or comments on idle well testing or maintenance.

**Summary of Issues Raised by the Public:**

The public has not raised any issues specific to this CSD requirement; however, wells at the oil field are discussed in the *Annual Drilling, Redrilling, Well Abandonment and Well Restoration Plan* and the public has the opportunity to provide comments on the Plan through the public outreach provisions of the CSD. In comments received during the scoping of this document the public noted that updates to the DOGGR updates to idle well regulations be considered in the review.

**Analysis of Compliance and Effectiveness:**

In California, an idle well is a well that has not been used for two years or more and has not yet been properly plugged and abandoned to DOGGR satisfaction. Updated regulations to improve maintenance of idle wells became effective on April 1, 2019. The regulations specify far more rigorous testing requirements that better protect public safety and the environment from the potential threats posed by idle wells. The regulations require idle wells to be tested and, if necessary, repaired, or permanently sealed (plugged and abandoned).

The DOGGR idle well updates include a Long-Term Idle Well Management & Elimination Plan (Plan) pursuant to Section 3206 of the Public Resources Code (PRC). The Plan contains three components: the terms of the Plan and operator agreement to the terms, the long-term idle well elimination schedule, and an annual review. Included in the plan is an elimination schedule for idle wells.

The well testing includes the determination of the fluid level of the well and may include other diagnostic tests as required by DOGGR. FMO&G and now SPR complete the required testing and maintenance pursuant to the DOGGR and submit the results to DOGGR pursuant to the regulations in an annual report. DOGGR inspects or waives the right to inspect at the various points stipulated in the permit during the plug and abandonment process. DOGGR also witnesses setting of the surface plug, capping the well, and remediating the immediate area around the well.

The provision is considered fully effective at this time and no further analysis is recommended.

**New Technology:**

This CSD provision is not directly linked to technology; however, the requirement language is linked to DOGGR regulations. As new technology regarding idle well testing and maintenance is developed and added to the State regulations, those requirements would be incorporated into the CSD provision by reference.

**Recommendations to Changes in Implementation:**

The provision has been implemented and is considered fully effective at this time, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The provision considered fully effective at this time, and no changes to the CSD language are recommended.

#### **4.32 FF. ABANDONED WELL TESTING**

*The operator shall conduct annual hydrocarbon vapor testing of areas within the oil field that contain abandoned wells. The testing shall be done using a soil gas vapor probe, or another method approved by the director. The results of the testing shall be submitted to the director and DOGGR on an annual basis. Abandoned wells that are found to be leaking hydrocarbons that could affect health and safety shall be reported to the director and DOGGR within 24 hours of the abandoned well test. If directed by DOGGR, the operator shall re-abandon the well in accordance with DOGGR rules and regulations. If the test results for an abandoned well area are at or below the background levels for two consecutive years that area shall thereafter be tested every five years.*

##### **Summary of Complaints:**

Abandoned well area testing has occurred annually since the adoption of the CSD as required; no complaints associated with the testing have been received by the County.

##### **Summary of Issues Raised by the Public:**

No issues regarding the abandoned well testing have been raised by the public. However, as part of the Settlement Agreement dated July 15, 2011 between concerned public parties, the County and PXP, the length of cement plugs used in the well abandonment process at the Inglewood Oil Field was increased from the 25 feet required by DOGGR to 150 feet.

##### **Analysis of Compliance and Effectiveness:**

Abandoned well area hydrocarbon vapor testing has been completed annually by a third-party consultant since the adoption the CSD. Results of the sampling were compared to the regulations and requirements of the City of Inglewood, LA County Department of Public Works, LA County Fire Department, the California Code, and the South Coast Air Quality Management District in reports submitted to LA County and DOGGR. The reports completed for this review period, 2014 through 2018 concluded that there is no evidence of leaking or natural seepage from abandoned wells at the oil field. However, the sampling for the 2018 compliance year did indicate very high levels of methane in the data for the area around Well BC-14. The sampling results for Well BC-14, completed in September 2018, contained methane at 72,000 ppmv. As a result of this very high level, and in coordination with the County, the operator researched the plug and abandonment data for the subject well and excavated the area surrounding the well down to the well cap. Results of the investigation documented that the well was plugged and abandoned properly in 1994. Further, the excavated well head was in good condition with the top containing an intact welded cap; test results of the well head and surrounding area did not indicate any significant amount of methane.

As a result of the non-conclusive tests surrounding the BC-14 well head the operator expanded sampling in the area with the installation of three permanent soil gas monitoring well locations. During follow-up testing of the three area wells, results showed elevated readings to the east and north-east of Well BC-14 and lower readings immediately above the well head. As a result of the re-testing, the operator excavated the area with the elevated readings and identified a gas pipeline with a pin hole leak; approximately 300 feet of the leaking pipeline was replaced. Both the operator and the County ECC test the area and the three permanent soil gas monitoring locations on a monthly basis and all three locations are scheduled for formal testing for the 2019 testing schedule.

With the exception of the leaking gas pipeline found in late 2018, the annual abandoned well area hydrocarbon vapor testing program to date has concluded that there is no evidence of leaking wells or natural seepage. The reports further conclude that the low levels of hydrocarbons detected are likely the result of natural degradation of crude oil in the near surface soil resulting from historic oil operations. The Annual Abandoned Well Testing reports are available at the Inglewood Oil Field web site at [www.inglewoodoilfield.com](http://www.inglewoodoilfield.com).

Finally, all wells abandoned since the settlement agreement was adopted have exceeded the 150 feet length of cement plugs as verified by the County. The annual abandoned well area hydrocarbon vapor testing has been completed as required. The provision is considered fully effective at this time and no further analysis is recommended.

**New Technology:**

The annual abandoned well area hydrocarbon vapor testing is performed by a third-party consultant consistent with accepted sampling procedures and lab analysis per the American Society for Testing and Materials (ASTM) D1945 analytical techniques. As new techniques in soil testing and analysis are developed and implemented, the testing program will be modified accordingly.

**Recommendations to Changes in Implementation:**

The required annual abandoned well area hydrocarbon vapor testing has been completed as required; no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The provision has been completed as required to date and no abandoned wells have been found to be leaking hydrocarbons that could affect health and safety. No wells have been required by DOGGR to be re-abandoned due to leaking hydrocarbons. Therefore, no changes to the CSD language are recommended.

**4.33 GG. WELL AND WELL PAD ABANDONMENT**

*If DOGGR orders the operator to plug and abandon any wells on the oil field, the operator shall deliver to the fire department, on a timely basis, all notices of intent to plug and abandon a well that the operator files with DOGGR and shall commence promptly and proceed diligently with the plugging and abandonment operations in accordance with DOGGR rules and regulations and the terms of the DOGGR permit to plug and abandon the well. Well abandonment may commence once all necessary permits and approvals are obtained. If the well pad associated with the abandoned well does not contain other production, injection, or idle wells, and will not be used for future drilling, then the operator shall promptly abandon the well pad consistent with the following provisions:*

*1. Closure of Sumps. The operator shall clean out all sumps, cellars, and ditches, and level and fill all sumps and depressions pursuant to DOGGR requirements. If sumps are lined with concrete, bottoms and walls shall be broken up and removed. Sumps shall be closed in accordance with Regional Water Quality Control Board and California Department of Toxic Substances Control requirements.*

2. *Well Pad Site Cleanup.* The operator shall leave the site entirely free of oil, rotary mud, oil-soaked earth, asphalt, tar, concrete, litter, debris, and other substances to the satisfaction of DOGGR and in compliance with federal requirements.

3. *Contaminated Materials.* All contaminated soils and materials within the well pad boundaries shall be removed and treated or disposed of in accordance with all local, county, State, and federal regulations.

4. *Well Pad Revegetation.* The Well pad shall be revegetated following the requirement of the native habitat restoration Plan.

**Summary of Complaints:**

This provision has not been implemented by DOGGR to date and the County has not received any complaints on the requirement to date.

**Summary of Issues Raised by the Public:**

There have been no issues raised by the public specific to this provision and DOGGR has not ordered any wells to be plugged or abandoned pursuant to this requirement. Wells at the oil field associated with plugging and abandonment activities are discussed in the *Annual Drilling, Redrilling, Well Abandonment and Well Restoration Plan* and may be subject to DOGGR Area of Review (AOR) requirements as discussed below. The public has the opportunity to provide comments on the *Annual Drilling, Redrilling, Well Abandonment and Well Restoration Plan* through the public outreach provisions of the CSD.

While no public input was received on this CSD provision, the terms of the Settlement Agreement negotiated between concerned public parties, the County and PXP (now SPR) included additional requirements to the CSD regarding well plugs. The agreement language increases the length of the cement surface plug from the 25-foot DOGGR requirement to 150 feet. The applicable language from the settlement agreement is listed below.

*Well Plugs.* DOGGR requires oil field operators to utilize a minimum 25-foot cement surface plug at the top of a well when abandoning any such well pursuant to Title 14 of the California Code of Regulations section 1723.5. To augment this requirement, for all wells abandoned at the Oil Field from the date of this Agreement, PXP shall utilize a total of 150-foot cement surface plug.

**Analysis of Compliance and Effectiveness:**

As noted above, DOGGR has not implemented this provision to require the operator to plug and abandon any wells to date. Wells voluntarily scheduled for plugging and abandonment are included in the *Annual Drilling, Redrilling, Well Abandonment and Well Restoration Plan* subject to DOGGR and the County review and approval. In addition, idle or previously plugged and abandoned wells are subject to the DOGGR Area of Review (AOR) process which is implemented when a new injection well is proposed as summarized below.

In California, injection wells associated with oil and natural gas production operations (Class II injection wells) are regulated by DOGGR pursuant to their Underground Injection Control (UIC) Program. The program is coordinated with the EPA for regulation of Class II injection wells under the federal Safe Drinking Water Act. When injection wells are included in the *Annual Drilling, Redrilling, Well Abandonment and Well Restoration Plan*, DOGGR implements the AOR process for the area with the potential to be affected by the proposed injection well. DOGGR defines the AOR surrounding a proposed injection well bore as a minimum one quarter mile

radius, with local geology and reservoir characteristics providing other input to the determination of the size of an AOR. The Inglewood oil field is divided into 15 AOR sections. The AOR process analyzes all wells, including idle and abandoned wells, in the area of a proposed new injection well to ensure the wells will not cause damage to life, health, property, or natural resources.

The provision language also includes requirements for closure of sumps, well pad clean up, contaminated materials, and well pad revegetation. As discussed for CSD 22.310.050.O *Sumps*, the Inglewood Oil Field does not contain any sumps and sumps are no longer used at the oil field. Existing well pads have been cleaned up but are not scheduled for abandonment or restoration because SPR standard practice is to re-use the well pad sites as feasible to avoid the impact of developing new well pad areas.

The provisions requiring abandonment of wells, closure of sumps and well pads cleanup have not been activated to date, however, the intent of the requirement is met through other CSD and DOGGR regulations, no further analysis is recommended.

**New Technology:**

This CSD provision is not directly linked to technology; however, the requirement language is linked to DOGGR regulations. As new technology or requirements regarding plugging and abandonment of wells are developed and added to the State regulations, those requirements would be incorporated into the CSD provision by reference.

**Recommendations to Changes in Implementation:**

The provision requirement has not been implemented to date; however, the intent of the requirement is accomplished through DOGGR requirements and other CSD provisions. No further analysis is recommended.

**Recommendations to Changes in CSD Language:**

The provision requirement has not been activated to date and the oil field wells are reviewed annually through DOGGR requirements and other CSD provisions. There is the potential for DOGGR to require the plugging and abandonment of a well that is not part of an annual Plan or associated with an injection well project in the future. Therefore, the requirement should remain and no changes to the CSD language are recommended at this time.

**4.34 HH. COUNTY REQUEST FOR REVIEW OF WELL STATUS**

*The director may periodically review the status of the operator's wells and submit to DOGGR a list of wells the director believes should be plugged and abandoned as specified in Public Resources Code section 3206.5 or any subsequently enacted State law related to a local jurisdiction's right to request State-agency review of idle wells.*

**Summary of Complaints:**

There have been no complaints regarding the County's discretion to request DOGGR review of wells as provided for in this provision.

**Summary of Issues Raised by the Public:**

There have been no issues raised by the public specific to County's discretion to request DOGGR review of wells as provided for in this requirement. The public can provide comments

on oil field documents such as compliance reports, plans, audits, and studies including the *Annual Drilling, Redrilling, Well Abandonment and Well Restoration Plan*.

**Analysis of Compliance and Effectiveness:**

The County has not requested that DOGGR require the Operator to plug or abandon any wells pursuant to this provision to date; therefore, the requirement has not been activated to date. Well status is reviewed by the County through other provisions of the CSD such as the *Well Abandonment and Well Restoration Plan* which must be approved prior to the initiation of each year's drilling program. CSD provision 22.310.050.FF, *Abandoned Well Testing*, requires abandoned well areas to be tested for hydrocarbon contamination and these reports be submitted to the County and DOGGR on an annual basis. If the County discovers any anomalies regarding the well testing, the County can request that DOGGR require the Operator to abandon or plug a well that could be emitting hydrocarbons. As stated above, this has not been necessary to date.

The provision requirement has not been activated to date and no further analysis is recommended.

**New Technology:**

This CSD provision is not directly linked to technology; however, the requirement language does include the associated State law, Public Resources Code section 3206.5. Should the State law be revised, operational status of wells, or the plugging and abandonment schedules of wells based on new technology, the new law would be incorporated into the CSD provision by reference.

**Recommendations to Changes in Implementation:**

The provision requirement has not been implemented to date and County review of the status of wells is accomplished through other CSD provisions. No further analysis is recommended.

**Recommendations to Changes in CSD Language:**

The provision requirement has not been activated to date and well status is reviewed annually through other CSD provisions. There is the potential for the need to review a well or wells that may not be part the *Annual Drilling, Redrilling, Well Abandonment and Well Restoration Plan* or other required plans. Therefore, the requirement should remain and no changes to the CSD language are recommended at this time.

**4.35 II. REDUCED THROUGHPUT TRIGGERING REVIEW**

*When oil or gas throughput is less than 630 barrels per day, the director shall conduct a public hearing to determine if shut down of the oil field or other actions are appropriate.*

**Summary of Complaints:**

This provision is intended to be implemented at or near the end of the Inglewood Oil Field's project life to determine if the oil production at the site remains economically viable and whether abandonment of the oil field is merited. The oil field has not reached the production levels that trigger this review and this provision has not been activated to date. The County has not received any complaints on the requirement.

**Summary of Issues Raised by the Public:**

The public, specifically the parties involved in the Settlement Agreement dated July 15, 2011, requested additional language be added to the requirement. The Settlement Agreement details additional requirements to the CSD as negotiated between the concerned public parties, the County and PXP (now SPR). The additional language from the Settlement Agreement regarding *CSD 22.310.050.II, Reduced Throughput Triggering a Review* is listed below:

*CSD Review Based On Reduced Production. When production drops to three percent of the estimated peak production of 21,000 barrels of oil per day, the County will review the CSD to consider whether modifications or closure of the Oil Field is necessary or appropriate or at such earlier date as the County determines appropriate.*

**Analysis of Compliance and Effectiveness:**

As noted above, the intent of this provision is to assist in the determination of the end of the project life of the oil field and therefore has not been activated to date. The provision requirement was augmented by additional language documented in the 2011 Settlement Agreement dated July 15, 2011, which provided for County review prior to the production throughput trigger of 3 percent of the estimated peak production to date of 21,000 barrels. The original CSD language required oil production throughput to reach 630 barrels per day to trigger County review. It should be noted that the numerical trigger for throughput review in both the original CSD language and the additional language from the Settlement Agreement is the same, 630 barrels per day (3% of 21,000 = 630).

The provision is considered fully effective at this time and no further analysis is recommended.

**New Technology:**

This provision is intended to assist in the determination of the end of the project life of the oil field based on a production throughput value. However, the additional language from the Settlement Agreement allows for County review *“at such earlier date as the County determines appropriate”*. Therefore, should the County decide that a review is appropriate prior to the oil production reaching the trigger value in the provision; the County can initiate the review.

**Recommendations to Changes in Implementation:**

The provision is intended to be implemented at or near the end of the oil fields project life and therefore has not been activated to date. The existing language and the amendments made through the Settlement Agreement provide sufficient flexibility to allow a review as the County considers appropriate. No changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The provision has not been activated to date and the requirement has been revised by additional language from the Settlement Agreement dated July 15, 2011. No additional changes to the CSD language are recommended.

**4.36 JJ. ABANDONMENT PROCEDURES**

*Within 180 days of permanent facility shut down, the operator shall submit an abandonment Plan to DOGGR and submit to the director for review and approval a timeline for facility removal, site assessment, and remediation as necessary. The operator shall begin abandonment of the site no later than 20 days after the director's approval of the timeline and*



*shall provide to the director quarterly updates on the abandonment process until such time as the oil field is abandoned and remediated. The operator shall post a performance bond to insure compliance with all provisions of this subsection and the operators and landowners shall continue to pay property taxes at the rates assessed during oil field operation until all site restoration work has been fully completed, as determined by the director.*

**Summary of Complaints:**

This provision is intended to be implemented at the cessation of oil field activities and permanent shut down of the Inglewood Oil Field; therefore, the provision has not been activated to date. The County has not received any complaints on the requirement.

**Summary of Issues Raised by the Public:**

This provision will not be implemented until permanent shut-down of the Inglewood Oil Field occurs. The County has not received any public input on the requirement.

**Analysis of Compliance and Effectiveness:**

As noted above, the provision will not be implemented until the Inglewood Oil Field is permanently shut down. The requirement includes that the facility Abandonment Plan be submitted to DOGGR and reviewed and approved by the County. This review process will allow for both DOGGR and the County to ensure the abandonment Plan meets all applicable requirements for plugging and abandonment of wells, equipment removal and remediation of the site. The requirement also includes a performance bond and the continuation of property tax payments until the County determines all site restoration work has been successfully completed. The Operator has provided an abandonment bond consistent with the provisions of this subsection.

The actual abandonment provision of this subsection has not been activated, and no further analysis is recommended at this time.

**New Technology:**

As the facility has not been shut down to date, this provision has not been activated. However, the condition language requires that the Abandonment Plan be submitted to DOGGR and to the County for approval. Therefore, new technologies involving facility removal, site assessment, and remediation available at the time the facility ceases operation may be reviewed, required and implemented as applicable to the abandonment Plan.

**Recommendations to Changes in Implementation:**

The provision involves requirements for abandonment and restoration of the Inglewood Oil Field and therefore has not been implemented. No changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The provision has not been activated. In addition, new technology or improvements in facility removal, site assessment, and remediation can be included to the CSD requirement through the review and approval of the abandonment Plan. Therefore, no changes to the CSD language are recommended.

## **5.0 Monitoring and Compliance (22.310.060)**

This section of the CSD outlines the monitoring, compliance, and the complaint process requirements of the CSD.

### **5.1 A. ENVIRONMENTAL QUALITY ASSURANCE PROGRAM ("EQAP")**

*The operator shall comply with all provisions of an environmental quality assurance program that has been approved by the director. The following provisions relate to the EQAP:*

*1. EQAP Requirements. The EQAP shall provide a detailed description of the steps the operator shall take to assure compliance with **all** provisions of this section, including but not limited to, all of the monitoring programs called for by this section.*

*2. Annual EQAP Reports. Within 60 days following the end of each calendar year, the operator shall submit to the director an annual EQAP report that reviews the operator's compliance with the provisions of the EQAP over the previous year and addresses such other matters as may be requested by the director. The annual EQAP report shall include the following:*

*a. A complete list and description of any and all instances where the provisions of the EQAP, or any of the monitoring programs referred to therein or in this section, were not fully and timely complied with, and an analysis how compliance with such provisions can be improved over the coming year.*

*b. Results and analyses of all data collection efforts conducted by the operator over the previous year pursuant to the provisions of this section.*

*3. EQAP Updates. The EQAP shall be updated as necessary and submitted to the director for approval along with the annual EQAP report. The EQAP updates shall be provided to the CAP and MACC for review and comment. Comments from the CAP and MACC, if timely received, shall be considered by the director before making a decision to approve the same. The director shall complete the review of EQAP updates as soon as practicable, and shall either approve the updated EQAP or provide the operator with a list of specific items that must be included in the EQAP prior to approval. The operator shall respond to any request for additional information within 30 days of receiving such request from the director, unless extended by the director.*

#### **Summary of Complaints:**

The County has not received any complaints regarding the EQAP provision of the CSD.

#### **Summary of Issues Raised by the Public:**

The public has not raised any issues specific to the EQAP provision. CAP members have received briefings at the CAP meetings regarding audits conducted at the oil field by the ECC and the ECC responded to questions from the CAP members as appropriate.

#### **Analysis of Compliance and Effectiveness:**

The EQAP was approved by the County in February 2009 and was revised on August 25, 2009. The EQAP contains sections on the background and operations of the oil field, the relationship of the EQAP with other CSD monitoring compliance programs, the EQAP compliance program and the compliance monitoring conducted by the oil field operator. The document also discusses the organization and relationship of the oil field compliance team consisting of County staff, the Environmental Compliance Coordinator (ECC), the MACC, the CAP, third-party

consultants and auditors, the ombudsperson, and the oil field operator staff. The EQAP contains the documentation requirements for the compliance program including the Environmental Quality Control Report, reporting of onsite inspection visits, and the format for the annual EQAP report. Subsection A.3 requires periodic updates to the EQAP as determined by the County. The EQAP has not been required to be updated since August 2009.

Annual EQAP compliance reports have been prepared and submitted by the operator as required by this provision with the first report completed on March 1, 2010. Reports for the compliance years 2014 through 2018 have been submitted to the County in March of each of the following compliance years. The annual reports are typically composed of three components; a narrative summary of the compliance status of the oil field, a compliance matrix in tabular format, and records of compliance documents completed for the subject year. The annual EQAP reports are reviewed by the County and are one of the primary documents analyzed during the compliance audits completed by the ECC.

EQAP audits have been completed for the operating years 2010, 2011, 2012, and 2016. EQAP audits were not completed for the years 2013, 2014, 2015, 2017, and 2018 due to preparation of the initial Periodic Review and SIMQAP audits completed in 2016, and 2018. Note the annual EQAP compliance reports are reviewed along with the associated compliance data and reports every year.

The audits are scheduled after review of the annual EQAP reports submitted by the Operator. Results of the audits are documented in a report that includes findings and recommendations for potential improvements in continued compliance with the EQAP-related provisions of the CSD. The suggestions are then tracked and monitored by the ECC to document the implementation of the recommendations. Overall, the Operator has been found to be in substantial compliance with all provisions of the CSD and the results of the audits have been favorable. However, recommendations for improvement have been provided after each yearly audit. Compliance verification with recommendations is reviewed by the County during ECC inspections and compliance report reviews.

The annual EQAP audits provide the County with the opportunity to complete a formal review of compliance activities and compliance documentation of the provisions of the CSD. The results of the audits indicate that the oil field is being operated in compliance with those requirements. The provision is considered fully effective at this time and no further analysis is recommended.

**New Technology:**

Subsection A.3 requires periodic updates to the EQAP as required by the County, therefore, as new technologies are developed for environmental protection and compliance for oil field operations, those requirements may be added to the EQAP as applicable.

**Recommendations to Changes in Implementation:**

The provision has been implemented and is considered fully effective at this time, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The provision is considered fully effective at this time, and no changes to the CSD language are recommended.

## 5.2 B. ENVIRONMENTAL COMPLIANCE COORDINATOR

*The operator shall recommend and fund the environmental compliance coordinators. The number of environmental compliance coordinators shall be determined by the county and shall take into account the level of oil operations at the oil field. The environmental compliance coordinator(s) shall be approved by, and shall report to, the director. The responsibilities of the environmental compliance coordinator(s) shall be set forth in implementation guidelines that may be developed by the county for the oil field and shall generally include:*

- 1. On-site, day-to-day monitoring of construction or drilling and redrilling activities as determined by the director.*
- 2. Taking steps to ensure that the operator, and all employees, contractors, and other persons working in the oil field, have knowledge of, and are in compliance with all applicable provisions of this section.*
- 3. Evaluating the adequacy of drilling, redrilling, and construction impact mitigations, and proposing improvements to the operator or contractors and the county.*
- 4. Reporting responsibilities to the various county agencies with oversight responsibility at the oil field, as well as other agencies such as DOGGR, and SCAQMD.*

### **Summary of Complaints:**

The County has not received any complaints regarding the ECC provision.

### **Summary of Issues Raised by the Public:**

The County received input on the ECC in the scoping comments solicited for the Periodic Review regarding the current ECC. Input included requests that a different third-party consultant be considered by the County and that public input be included as part of the selection process for the ECC. As allowed for by this provision, the current ECC is not a singular individual but rather a third-party consulting firm familiar with the oil and gas industry and the CSD as further discussed below. The ECC is required to be approved by, and report to, the Director of DRP.

### **Analysis of Compliance and Effectiveness:**



An ECC position has been funded by the operator as required by this provision since the adoption of the CSD. The ECC has met the qualification requirements for the position and have been approved by the County. The ECC is familiar with the compliance requirements of the CSD and the environmental impacts and mitigation associated with oil field operations. The oil field site visits performed by the ECC include an inspection of the drilling or

redrilling rig to check compliance on the CSD provisions such as the Quiet Mode Drilling Plan, air quality monitoring equipment, and noise monitoring equipment. The ECC site inspections

are coordinated with oil field management to gain access to oil field staff, oil field contractors and for access to the oil field to check on the compliance provisions of the CSD. The ECC also participates in reviewing and commenting of all plans submitted by the Operator in compliance with the CSD. The ECC also includes a number of oil field related subject matter experts that can be used at any given time depending on the compliance needs of the County in ensuring compliance with the CSD. Experts include acoustical engineers, air quality, biology, landscape architects, risk assessment and planning experts, among others. As outlined in the EQAP, the ECC is part of the coordinated compliance effort of the County, other resource agencies, and the oil field operator.

The provision is considered fully effective at this time and no further analysis is recommended.

**New Technology:**

The EQAP and ECC provisions allow new technologies in environmental compliance equipment to be used by the ECC as those technologies are developed.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

**5.3 C. SAFETY INSPECTION, MAINTENANCE, AND QUALITY ASSURANCE PROGRAM ("SIMQAP")**

*The operator shall comply with all provisions of a safety inspection, maintenance, and quality assurance program that has been approved by the director and the fire chief.*

1. *SIMQAP Requirements. The SIMQAP shall, at a minimum provide for:*

- a. Inspection of construction techniques;*
- b. Regular maintenance and safety inspections;*
- c. Periodic safety audits;*
- d. Corrosion monitoring and leak detection; and*
- e. Inspections of all trucks carrying hazardous and/or flammable material prior to loading.*

2. *SIMQAP Updates. The operator shall periodically review and revise the SIMQAP to incorporate changes in procedures, and new safety and maintenance technologies and procedures. The operator shall make such revisions at least every five years, or more frequently, if the operator determines changes are necessary or if requested by the director or the fire chief. The operator shall submit SIMQAP updates to the director and the fire chief for their review and approval. The director shall complete the review of SIMQAP updates as soon as practicable, and shall either approve the updated SIMQAP or provide the operator with a list of specific items that must be included in the SIMQAP prior to approval. The operator shall*

*respond to any request for additional information within 30 days of receiving such request from the director, unless extended by the director.*

*3. Worker Notification. The operator shall ensure that all persons working on the oil field comply with all provisions of the currently approved SIMQAP.*

*4. Inspections. The SIMQAP shall provide for involvement of county staff or the environmental compliance coordinator in all inspections required by this section.*

**Summary of Complaints:**

The County has not received any complaints regarding the SIMQAP provision of the CSD.

**Summary of Issues Raised by the Public:**

Input from the scoping comments for this review was received on the SIMQAP documentation and reports. The comments requested links to the SIMQAP updates and SIMQAP documents, however, the SIMQAP documentation for both the SIMQAP document itself and the audit reports are available on the oil field website.

Maintenance and maintenance frequency were discussed at CAP meetings after a level controller failure and subsequent tank overflow event on November 22, 2018. The tank overflow event resulted in 14 odor complaints in the Ladera Heights neighborhood and a request by the public for more information on the amount and type of gas released by the overflow event. As a result of this request, the County ECC staff coordinated with the operator to obtain gas sample data from the subject tank and performed a modeling analysis to calculate the offsite concentrations and health impacts of the gas release. The results of the analysis were presented and discussed at the April 25, 2019 CAP meeting. The Tank Overflow Modeling analysis report is available in a power point format on the County DRP oil field website.

The level controller that failed was part of the inspection and maintenance program required by subsection C.1.b of this provision. While the piece of equipment failed, it had been inspected as part of the maintenance program on November 2, 2018, approximately 20 days before the failure. The inspection and maintenance program provide for sufficient inspection and maintenance of equipment but cannot completely ensure against potential malfunctions that could occur to various pieces of equipment. Due to the fact that the November 22, 2018 tank level controller failure resulted in offsite impacts to the public, the County required the installation of a second, redundant backup system, to prevent the potential re-occurrence of a tank overflow event. The backup system, a high-level alarm, was installed in May 2019 and successfully tested for the ECC on May 23, 2019. Additional tanks are under review by the operator and the County to determine applicability of additional alarm systems.

**Analysis of Compliance and Effectiveness:**

The SIMQAP was completed and implemented in May 2009 and approved on April 13, 2011. The document was prepared with the assistance of a professional engineer familiar with the equipment, environmental impacts, and environmental regulations of oil field facilities. The SIMQAP includes requirements for facility staffing, fire protection systems, process controls, gas detection, emergency systems, and leak prevention and detection measures. The inspection and maintenance section of the document provides details on the preventive maintenance program, safety device inspections, equipment inspections, electrical equipment inspection, and the inspection and maintenance of flow lines. The document also includes a discussion of the Transportation Security Plan which lists the requirements for trucks carrying hazardous and/or

flammable materials as required by subsection C.1.e. Oil field staff has received training on the SIMQAP as a component of the training on the CSD completed on an annual basis.

All oil field equipment, and the associated maintenance of that equipment, is tracked and scheduled with a vendor-supplied computer-based maintenance management program. This schedule is linked to the requirements of the SIMQAP. The operator also conducts annual internal safety audits of the facility which provide for review and inspection of the oil field equipment.

The previous Periodic Review recommended that SIMQAP audits be completed pursuant to subsection C.1.c, two SIMQAP audits have been completed with reports dated July 2016 and August 2018. The next SIMQAP Audit is scheduled for 2020.

The provision is considered fully effective at this time and no further analysis is recommended.

**New Technology:**

The SIMQAP is required by this provision to be periodically reviewed and revised to incorporate changes in procedures, new safety technologies, and new maintenance technologies. As noted above, the oil field tanks are under review by the County for additional alarms with one additional redundant alarm system installed in May 2019.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

**5.4 D. ANNUAL EMERGENCY RESPONSE DRILLS OF THE COUNTY AND CULVER CITY FIRE DEPARTMENTS**

*The operator shall demonstrate the effectiveness of the emergency response Plan by responding to one planned emergency response drill per year which shall be conducted in conjunction with the county and Culver City fire departments. Emergency response drills required by other agencies that involve the county and Culver City fire departments can be used to satisfy this provision. In addition, the operator shall demonstrate the effectiveness of the emergency response Plan by responding to not more than two unannounced drills each year which may be called by the county fire department at the oil field. If critical operations are then underway at the oil field, the operator need not respond to a unannounced drill to the extent such a response would, as a result of such critical operations, create an undue risk of personal injury or property damage, but in such case the operator must promptly explain the nature of the critical operations, why response is not possible, and when the critical operations will be completed.*

**Summary of Complaints:**

The County has not received any complaints regarding the emergency response provision of the CSD.

**Summary of Issues Raised by the Public:**

In the comments received for the scoping of this document, Culver City requested that the County encourage that the unannounced drills allowed for under this provision occur

periodically. This issue was noted and was a recommendation in the first Periodic Review (see Section 2.5) and is also a recommendation in this review (see Section 1.8).

**Analysis of Compliance and Effectiveness:**

Emergency response drills were conducted annually by the operator on October 3, 2014, November 5, 2015, November 3, 2016, June 29, 2017, and March 14, 2018. Each drill is coordinated by the State Office of Spill Prevention and Response (OSPR) with notice to other resource agencies including the County and Culver City fire departments. The emergency response drills include a demonstration of the field capabilities and equipment for emergency response and are well attended by regulatory agencies; the drill conducted on March 14, 2018 included staff from the Culver City Fire Department, LA County Fire Department, Fish and Wildlife Service, OSPR, and the County ECC. All agencies involved in the March 2018 drill passed the operator, SPR, with high marks for preparedness, documentation, and coordination with agency staff. In addition to operator staff and the regulatory agencies, the drills also include staff from local spill response contractors. The spill response contractor is the same contractor that would be utilized in the event of a spill and their participation in the annual drills provides with familiarity with both the oil field, oil field equipment, and oil field staff.

This provisions also calls for up to two unannounced drills per year at the discretion of the Fire Department; no unannounced drills have taken place at the oil field to date.

The provision is considered fully effective at this time and no further analysis is recommended. However, it is recommended that efforts be made to ensure that unannounced drills take place at the oil field as allowed for by the provision of the CSD. The Department of Regional Planning may coordinate with the County Fire Department to encourage that unannounced drills occur in the future.

**New Technology:**

The annual emergency response drills and updates to the ERP document allow for new technology and techniques to be introduced and included as they become available.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended, and no changes to implementation are recommended. However, as stated above, it is important to encourage that unannounced drills are conducted periodically at the oil field.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

**5.5 E. NOISE MONITORING**

*The public health department shall retain an independent qualified acoustical engineer to monitor ambient noise levels in the areas surrounding the oil field as determined necessary by the director or the director of public health. The monitoring shall be conducted unannounced and within a time frame specified by the director or the director of public health. Should noise from the oil operations exceed the noise thresholds specified in this section, no new drilling or redrilling permits shall be issued by the county until the operator in consultation with the director and director of public health identifies the source of the noise and the operator takes the steps necessary to assure compliance with thresholds specified in this section. The results of all such monitoring shall be promptly posted on the oil field website and provided to the CAP.*



**Summary of Complaints:**

The County has not received any complaints regarding the requirement for noise monitoring of this provision. Noise complaints are discussed in the analysis for CSD Provision E.5.

**Summary of Issues Raised by the Public:**

See the discussion of CSD Provision 22.310.050.E, *Noise Attenuation*, for detail on noise issues with the oil field.

**Analysis of Compliance and Effectiveness:**

The provision requires that the County Department of Public Health use of an independent qualified acoustical engineer for noise monitoring if deemed necessary. As discussed in the analysis for the noise attenuation provision, no exceedances of the noise regulations in the County Code or of the noise limits specified in subsection 22.310.050.E.1 of the CSD have been recorded. Therefore, the County has not determined that the additional noise monitoring required by this provision has been necessary.

The provision has not been activated to date and no further analysis is recommended.

**New Technology:**

The provision requires the use of an independent qualified acoustical engineer for noise monitoring; therefore, any noise monitoring required by this provision would be completed with current noise measurement technology.

**Recommendations to Changes in Implementation:**

This provision has not been implemented to date; however, no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

**5.6 F. VIBRATION MONITORING**

*The public health department shall retain an independent qualified acoustical engineer to monitor vibration in the areas surrounding the oil field as determined necessary by the director or the director of public health. The monitoring shall be conducted unannounced and within a time frame specified by the director or the director of public health. Should vibration from the oil operations exceed the vibration thresholds specified in this section, no new drilling or redrilling permits shall be issued by the county until the operator in consultation with the director and director of public health identifies the source of the vibration and the operator takes the steps necessary to assure compliance with thresholds specified in this section. The results of all such monitoring shall be promptly posted on the oil field web site and provided to the CAP. A telephone number by which persons may contact the operator at all times to register complaints regarding oil operations shall be posted in the main entrance sign to the facility and included in the annual newsletter required by subsections Section 22.310.100.B.2 (Newsletter) and on the oil field web site required by subsection Section 22.310.100.B.3 (Oil Field Web Site).*

**Summary of Complaints:**

The County has not received any complaints regarding the requirement for vibration monitoring of this provision. Vibration is discussed in the analysis for CSD Provision 22.310.050.F.

**Summary of Issues Raised by the Public:**

See the discussion of CSD Provision 22.310.050.F, *Vibration Reduction*, for detail on vibration issues within the oil field.

**Analysis of Compliance and Effectiveness:**

The provision requires that the County Department of Public Health use an independent qualified acoustical engineer for vibration monitoring if deemed necessary. As discussed in the analysis for the vibration reduction provision, no exceedances of the vibration criteria specified in Section 22.310.050.F of the CSD have been recorded. Therefore, the County has not determined that the additional vibration monitoring required by this provision has been necessary.

The provision has not been activated to date and no further analysis is recommended.

**New Technology:**

The provision requires the use of an independent qualified acoustical engineer for vibration monitoring; therefore, any vibration monitoring required by this provision would be completed with current vibration measurement technology.

**Recommendations to Changes in Implementation:**

This provision has not been implemented to date, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

**5.7 G. COMPLAINTS**

*All complaints related to oil operations received by the operator shall be reported on the same business day to the environmental compliance coordinator and to the director. In addition, the operator shall maintain a written log of all complaints and provide that log to the director, the MACC, and CAP on a quarterly basis. Depending upon the nature of the complaint, the operator shall report the complaint to the SCAOMD, DOGGR, and any other appropriate agencies with oversight authority regarding the complaint at issue. If the complaint is received after normal business hours, it shall be reported to the environmental compliance coordinator and the agencies at the opening of the next business day*

**Summary of Complaints:**

The County has received complaints on a variety of issues regarding the operation of the oil field including odor, noise, vibration, property damage, and dust. These complaints are discussed in the applicable sections of this Periodic Review and are summarized in the table below.

**Summary of Issues Raised by the Public:**

Comments have been noted on the complaint process with requests by the public for more detail in both the follow-up investigation of complaints and the documentation of that follow-up investigation. Complaint logs are posted on the County web site by quarter. The public has also expressed dissatisfaction with the results of the follow-up investigation and documentation of complaints, particularly odor complaints. In addition, the County Department of Public Health

noted in scoping comments for this document that the complaint system should be audited by an independent party to follow up on complaints and evaluate the complaint system.

**Analysis of Compliance and Effectiveness:**

The oil field assigns a primary and a back-up staff person to be on call to respond to complaints. In addition, the oil field ombudsperson is available to coordinate directly with the public to discuss complaint issues with the oil field. Oil field personnel responding to a complaint follow a procedure for logging in and responding to complaints from the public. The procedure first requires that oil field staff call back the complaining party and obtain the following information:

- Name, address, phone number.
- Location of the issue (noise, odor, vibration, other).
- Specific detail on the complaint (sound type, smell, other).
- Time the issue was first noticed.
- Confirm with caller that the issue will be investigated.

The next step in the complaint procedure is to contact the oil field operator currently in charge of the field and initiate an investigation on the complaint. The oil field operator is required to correspond back as soon as possible on the results of the investigation. The oil field staff person handling the complaint then reports the results of the investigation back to the member of the public that filed the complaint and updates the complaint log. The incident is reported to the oil field ombudsperson no later than the next business day and the Director, ECC, and any other appropriate agency staff with oversight authority are notified of the complaint. A follow-up of the complaint is then a component of the ECC site inspection. The SCAQMD has also assisted the oil field operator on complaint investigations and their input is noted on the complaint logs.

The complaint procedure required by this provision has been implemented, is ongoing, and has improved over time. Improvements during this Periodic Review period from the initial years of the CSD to the complaint process follow up investigations include the addition of meteorological data and mapping analysis. The County ECC has also provided neighborhood onsite follow-up on certain complaints such as the odor issues noted by the Village Green community in the third quarter of 2018 where the ECC visited the community and interviewed select residents. A summary of the complaint log for the years 2014 through 2018 is provided in the table below.

<b>Complaint Log Summary</b>						
<b>Type/Year</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>Total</b>
<b>Odor</b>	28	9	13	13	41	104
<b>Noise</b>	7	6	2	3	5	23
<b>Vibration</b>	5	0	0	0	0	5
<b>Property Damage</b>	1	2	0	3	0	6
<b>Dust</b>	1	2	1	0	0	4
<b>Other</b>	0	2	1	1	1	5
<b>Total</b>	42	21	17	20	47	147

As noted above, the complaint process has improved over time with the addition of meteorological and mapping data, but review of the complaint logs indicates some of the documentation on the complaint itself is not documented completely. Specifically, the address, phone number, or pertinent detail on the complaint is not provided by the complaining party. Therefore, it is recommended that the operator and the 1-800 telephone line vendor improve the

data collected for each complaint to provide a more effective follow-up investigation and tracking of oil field complaints.

**New Technology:**

Complaint logs are posted to the County web site quarterly and the equipment used for follow-up investigations, such as noise or air quality monitoring equipment or air, odor, and noise modeling, represent current technology. The monitoring equipment and modeling software can be updated as this new technology becomes available.

**Recommendations to Changes in Implementation:**

This provision is adequately implemented; however, as stated above, it is recommended that the operator meet with staff involved with the complaint process and the 1-800 telephone line vendor to review the required information necessary for filing a complete complaint; this will improve the quality of the data collected for a complaint, assist in investigation of the complaint, and therefore upgrade the complaint process and data base.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

## **6.0 Administrative Items (22.310.070)**

This section of the CSD outlines the administrative requirements including cost of enforcement, insurance and bond obligations.

### **6.1 A. COST OF IMPLEMENTING MONITORING AND ENFORCING CONDITIONS**

*The operator shall be fully responsible for all reasonable costs and expenses incurred by the county or any county contractors, consultants, or employees, in implementing, monitoring, or enforcing this section, including but not limited to, costs for permitting, permit condition implementation, mitigation monitoring, reviewing and verifying information contained in reports, undertaking studies, research and inspections, administrative support, and including the fully burdened cost of time spent by county employees on such matters.*

#### **Summary of Complaints:**

This requirement involves the County cost recovery methodology for CSD compliance; no complaints from the public have been received on this provision.

#### **Summary of Issues Raised by the Public:**

The public is not involved in this condition; the payment of CSD compliance and enforcement costs is a legislative procedure implemented through the CSD and the Los Angeles County Code requirements. No public input has been received on this provision.

#### **Analysis of Compliance and Effectiveness:**

SPR and prior operators (FM O&G and PXP), have made timely payments on all CSD monitoring and enforcement costs to the County through the draw down account required by CSD Provision 22.310.070.B.2. All costs from the implementation of the CSD, permit processing, mitigation monitoring, compliance report research, review and verification, inspections, and administrative costs have been paid by the operator from this account. Review of the payment history since the adoption of the CSD shows no late payments or other issues with the legislative cost reimbursement outlined in this provision.

The condition is considered fully effective at this time and is administrative in its intent, and no further evaluation is recommended.

#### **New Technology:**

This provision of the CSD is a County administrative process and a discussion of new technology is not applicable.

#### **Recommendations to Changes in Implementation:**

This requirement has been implemented, the subject payments are made by the operator in a timely manner, and no changes to implementation are recommended.

#### **Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

### **6.2 B. DRAW-DOWN ACCOUNT**

*The operator shall maintain a draw-down account with the Department of Regional Planning from which actual costs will be billed and deducted for the purpose of defraying the expenses*

*involved in the county's review and verification of the information contained in any required reports and any other activities of the county, including but not limited to, enforcement, permitting, inspection, coordination of compliance monitoring, administrative support, technical studies, and the hiring of independent consultants. The initial amount to be deposited by the operator shall be \$500,000. In the first year, if withdrawals from the account have reduced its balance to less than 50 percent of the amount of the initial deposit (\$250,000), the operator shall deposit \$50,000 in supplemental funds within 30 business days of notification. After the first year, if the balance in the draw-down account is reduced at any time to \$50,000, the operator shall deposit \$50,000 in supplemental funds on each occasion that the account is reduced to \$50,000 or less within 30 business days of notification. There is no limit to the number of supplemental deposits that may be required. At the discretion of the operator, the amount of an initial or supplemental deposit may exceed the minimum amounts specified in this subsection. The director may, from time to time, increase the minimum \$50,000 figure to account for inflation or the county's experience in obtaining funds from the account.*

**Summary of Complaints:**

This requirement involves the payment method of CSD compliance and enforcement costs between the County and the operator; no complaints have been received by the County on this provision.

**Summary of Issues Raised by the Public:**

This provision details the accounting and payment method of CSD compliance and enforcement costs between the County and operator; no public issues have been raised on this requirement. The County received input from Culver City in the scoping comments for this report requesting that the draw down account be used for studies such as the Public Health, Ground Movement, and Air Quality Studies. The draw down account is used to pay the costs of review of the technical reports referenced in the Culver City comment. If review of the subject reports determines additional or expanded studies are necessary, the County can require such reports. The County has not made that determination for any of the studies completed pursuant to CSD requirements for this Periodic Review period.

It should be noted that The Public Health Study is administered and funded by the DPH as stipulated by the Settlement Agreement; the CSD does not fund these studies. The Air Quality study funding amount was determined in the Settlement Agreement at \$250,000 as specified in Condition 8 of the agreement.

**Analysis of Compliance and Effectiveness:**

As noted in the discussion for CSD Provision 22.310.070.A, FM O&G and now SPR, have made timely payments on all CSD monitoring and enforcement costs. These payments have been made via the draw-down account as required by this provision. The draw-down account has been maintained at or above the \$50,000 balance as required by this requirement since the adoption of the CSD. The account balance on December 31, 2018 was \$50,332.61 and the County has not required an increase of the minimum balance of the draw-down account to date.

The condition is considered fully effective at this time and is administrative in its intent, and no further evaluation is recommended.

**New Technology:**

This condition is a financial agreement between the operator and the County, and a discussion on new technology is not applicable.

**Recommendations to Changes in Implementation:**

This requirement has been implemented the draw-down account is maintained by the operator as required; and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

**6.3 C. INDEMNIFICATION**

*The operator shall enter into an agreement with the county to indemnify and hold harmless the county, its elected and appointed officials, agents, officers, and employees from any claim, action, or proceeding for damages arising from its oil operations, including water, air or soil contamination, health impacts, or loss of property value during the oil operations, well abandonment, and post-abandonment activities with terms approved by, and in a form acceptable to, the CEO.*

**Summary of Complaints:**

This provision is administrative in its intent requiring an indemnification agreement; no complaints have been received by the County on this provision.

**Summary of Issues Raised by the Public:**

As noted above, this is an administrative requirement that is a standard County permit condition, and no public input has been received by the County on this provision.

**Analysis of Compliance and Effectiveness:**

This provision is administrative in its intent requiring an indemnification agreement. The required agreement was documented in a letter signed by the operator and the County dated November 12, 2009; the agreement is on file with the County. The County recently reviewed (August 2017) the indemnification documentation and determined the language is appropriate to protect the interests of the County.

The condition is considered fully effective at this time and is administrative in its intent, and no further evaluation is recommended.

**New Technology:**

This condition is an administrative requirement for an indemnification agreement, and a discussion on new technology is not applicable.

**Recommendations to Changes in Implementation:**

This requirement is a standard County administrative requirement and has been implemented, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

**6.4 D. INSURANCE REQUIREMENTS**

*Within 90 days following the effective date of the ordinance creating this section or such later time as may be approved by the director for good cause shown, and without limiting the operator's indemnification of the county as required in the preceding subsection, the operator*

*shall provide evidence of insurance coverage that meets county requirements as required and approved by the CEO including identifying the county and its elected and appointed officers and employees as additional insureds. Such coverage shall be maintained so long as oil operations are conducted within the district and until such time as all abandonment requirements are met and certified by the appropriate local, State, and federal agencies. Such insurance coverage shall include but is not necessarily limited to the following: general liability, auto liability, professional liability, and environmental impairment liability coverage insuring clean-up costs and endorsing for 'Sudden and Accidental' contamination or pollution. Such coverage shall be in an amount sufficient to meet all applicable State and federal requirements, with no special limitations. At the operator's request and only with county approval by the CEO, the operator may self-insure all or any part of the above coverage obligations in lieu of purchasing commercial coverage. These insurance requirements shall be in addition to all other indemnification, insurance and performance security required by federal, State, and local regulations and permits.*

**Summary of Complaints:**

This provision is administrative in its intent requiring an insurance policy for operation of the oil field; the County has not received any complaints from the public on the insurance requirement except as discussed below.

**Summary of Issues Raised by the Public:**

Input on both the insurance and the performance security bond required by CSD Provisions 22.310.070 D and E was received by the County in comments solicited for the Periodic Review. The comments can be summarized as requesting the CSD contain insurance and bonding requirements for disasters, abandonment and clean-up costs and that those requirements be reviewed for adequacy.

**Analysis of Compliance and Effectiveness:**

PXP, the operator at the time of CSD adoption, provided the County with an insurance policy meeting the liability and environmental impairment liability requirements of this provision on January 18, 2010. The current operator of the oil field, SPR, updated this insurance to reflect the change in operator from FM O&G to SPR in December 2016/January 2017. The updated insurance policy has been reviewed by the County and meets all applicable State and federal requirements. The County recently evaluated (August 2017) the amount of coverage currently provided by the Operator and has determined that given the nature of the operations at the oil field, the coverage amounts are adequate. Further, the CSD does not determine the amount of insurance required under Provision 22.0310.070.D or the performance bond amount required under Provision 22.0310.070.E; the financial and technical requirements of these provisions are determined by the County CEO. In addition, the County may conduct additional review at any time independent of the Periodic Review process.

The condition is administrative in its intent and is considered fully implemented, and no further evaluation is recommended.

**New Technology:**

This condition is an administrative requirement, and new technology is not applicable.

**Recommendations to Changes in Implementation:**

This requirement is an administrative requirement that has been implemented, and no changes to implementation are recommended.



**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

**6.5 E. PERFORMANCE SECURITY**

*The operator shall be subject to the following provisions:*

*1. Performance Bond. Prior to issuance of the first drilling or redrilling permit pursuant to this section, the operator shall provide to the department of regional planning a faithful performance bond or financial instrument in the sum to be determined by the CEO, payable to the county and executed by a corporate surety acceptable to the county and licensed to transact business as a surety in the State of California. Such bond shall be conditioned upon the faithful performance by the operator of duties related to well abandonment, site restoration, and environmental cleanup and shall be in a format and include terms approved by the CEO.*

*2. Change of Operator. The performance bond shall continue in force for one year following any sale, transfer, assignment, or other change of operator of the oil field, or of the current operator's termination of activities at the oil field. The county may release said bond prior to the end of the one-year period upon satisfaction by the operator of all its obligations. Notwithstanding the foregoing, the performance bond shall not be terminated or released upon the sale, transfer, assignment, or other change of operator until the new operator has delivered a replacement bond complying with the provisions of this Section 22.301.070 .*

*3. Funding Options. At its sole option, the county may accept certificates of deposit, cash deposits, or U.S. government securities in lieu of commercial bonds to meet the above bonding requirements on terms approved by the CEO.*

**Summary of Complaints:**

This provision is administrative in its intent requiring a bond regarding the abandonment, site restoration, and environmental cleanup of the oil field. The County has not received any complaints on the performance security required by this provision apart from the public input noted below and in the discussion for CSD Provision 22.0310.070.D.

**Summary of Issues Raised by the Public:**

As noted in the discussion for CSD Provision 22.0310.070.D, the County received comments for the scoping of this document. The comments requested that the amounts of insurance and bonding be reviewed for adequacy.

**Analysis of Compliance and Effectiveness:**

PXP, the operator at the time of CSD adoption, provided the County with a performance bond issued by an acceptable corporate surety licensed to transact business in the State of California on September 29, 2009. The bond has been updated by subsequent operators consistent with the requirements of this provision.

As noted in the discussion on Provision 22.0310.070.D above, the CSD does not determine the amount of insurance required or the performance bond amount required these administrative provisions; the financial and technical requirements of these provisions are determined by the County CEO. The County completed an analysis of the bond amount in January 2017 and determined the amount should be increased from \$5,000,000 to \$6,800,000 to be appropriate for the current levels of operations at the oil field. The current operator, SPR, has updated the

bond to reflect the revised bond amount. Further, the County may conduct additional review at any time independent of the Periodic Review process; therefore, the County has the ability, through this provision, to amend the amounts required if deemed necessary in the future.

The condition is administrative in its intent and is considered fully implemented, and no further evaluation is recommended.

**New Technology:**

This condition is an administrative requirement, and a discussion on new technology is not applicable.

**Recommendations to Changes in Implementation:**

This requirement is an administrative requirement that has been implemented; no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

**6.6 F. OTHER OBLIGATIONS**

*The insurance, indemnification, and performance security requirements in subsections C, D and E, above, shall be in addition to all other indemnification, insurance, and performance security required by federal, State and local regulations, and permits.*

**Summary of Complaints:**

This provision is administrative in its intent and references the requirements to the operation of oil field in addition to those outlined in the CSD; the County has not received complaints on this provision.

**Summary of Issues Raised by the Public:**

The County has not received input on the other agency requirements referenced by this condition. Any input received by these other agencies regarding those regulations is outside the scope of this Periodic Review.

**Analysis of Compliance and Effectiveness:**

The condition is administrative in its intent and is considered fully implemented, and no further evaluation is recommended.

**New Technology:**

This condition is an administrative requirement; a discussion on new technology is not applicable.

**Recommendations to Changes in Implementation:**

This requirement is an administrative requirement, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

## 6.7 G. PERIODIC REVIEW

*The county shall conduct a comprehensive review of the provisions of this section at least every five years to determine if the provisions of this section are adequately protecting the health, safety, and general welfare. Such reviews shall, among other things, consider whether additional provisions should be added, appended, or removed. One of the main goals of the Periodic Review shall be to evaluate if proven technological advances that would further reduce impacts of oil operations on neighboring land uses should be incorporated into the provisions of this section.*

*1. Review Requirements. Each review shall include a report by a hearing officer designated by the director, which shall be prepared after public notice and an opportunity for public comment. The report shall include a comprehensive analysis of the effectiveness of this section, and shall review and consider enforcement activity, operational records, and any other issues relating to oil operations. The report, at the option of the county, may include a survey of residents near the oil field regarding noise, odors, vibrations, and other issues requested by the director of public health. A draft of the report shall be provided to the CAP and the operator for review and comment. All comments on the draft report from the CAP and the operator shall be submitted to the hearing officer in writing, and will be considered, if timely received, before the report is finalized. The final report by the hearing officer shall include a recommendation as to whether the director should prepare proposed amendment to this section for submission to the board of supervisors.*

*2. Early Reviews. At the discretion of the director, reviews of this section may be conducted more frequently than every five years. Without limiting such discretion, the director shall consider whether an early review should be undertaken if more than three material violations occur within any 12-month period.*

*3. Initial Review. The initial review shall occur no sooner than three years and no later than five years after the effective date of the ordinance establishing this section unless the director determines that such initial annual review shall occur at an earlier time pursuant to Subsection G.2, above.*

### **Summary of Complaints:**

No complaints to date have been received by the County on the Periodic Review. The first Periodic Review was completed with a final report dated September 2015.

### **Summary of Issues Raised by the Public:**

The County solicited input on the CSD for this Periodic Review as required by this provision. Input from the public was obtained by comments provided by letter, email, and/or at the Community Advisory Panel (CAP) meetings. Comments have been received on a variety of CSD provisions and are acknowledged and discussed in the analysis of the relevant CSD condition of this report.

### **Analysis of Compliance and Effectiveness:**

This report, prepared subject to this provision, documents compliance with the Periodic Review requirement. The review provides a comprehensive analysis of the effectiveness of the requirements of each CSD provision. Information sources and input for this review included:

- Compliance records, reports, plans, and training records.
- Monitoring data.

- Operational records.
- ECC site inspections.
- Annual EQAP audit reports.
- Enforcement actions.
- Interviews of FM O&G staff.
- Results of the electronic survey.
- CAP meeting comments.
- Written comments.
- Complaint records.

The draft report was circulated for review and comment to the CAP, members of the public, other agencies, and the operator. Comments on the draft report were considered in the preparation of the final draft. The report was prepared consistent with the five-year time frame requirement stipulated in subsection G.3.

This report was prepared pursuant to the CSD requirement, and therefore the condition is considered fully implemented; no further evaluation is recommended.

**New Technology:**

This Periodic Review of the CSD discusses new technology, as applicable, in the analysis of each condition of the CSD permit of the report.

**Recommendations to Changes in Implementation:**

This requirement has been implemented, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

**6.8 H. MULTIPLE AGENCY COORDINATION COMMITTEE (“MACC”)**

*A MACC shall be established to coordinate activities and communications between the various agencies with regulatory authority over the oil operations within the district. While each agency will continue to make its own decisions with regard to their respective areas of authority, the MACC will allow for collection and analysis of data and for discussion of both strategic evaluations and enforcement actions taken by the various agencies at the oil field.*

*1. MACC Members. The director shall establish a MACC that includes representatives from the following agencies: the county department of regional planning, the county fire department, the county department of public works, and the county department of public health. The SCAQMD, the Regional Water Quality Control Board, DOGGR, and Culver City fire department shall be invited to appoint a representative from their agency as a member of the MACC.*

*2. MACC Chair. The director or his designee shall chair the MACC meetings and shall coordinate all MACC activities including scheduling and keeping minutes of MACC meetings.*

*3. MACC Meetings. The MACC shall determine its meeting schedule.*

*4. Documents Provided to the MACC. Copies of all monitoring and compliance reports, plans, and other documents that are requirements of this section shall be submitted to the MACC.*

**Summary of Complaints:**

The County has not received any complaints on the MACC.

**Summary of Issues Raised by the Public:**

The County received input during the scoping period of this document that the MACC meet with the CAP on an annual basis. As detailed in the provision, the MACC is composed of the regulatory agencies listed in subsection H.1 of the provision and is not a public meeting. The CSD provides for interaction with the public under Provision 22.310.100, Public Outreach which includes the CAP, community meetings, the community letter, the oil field web site, and the ombudsperson. Further, the CAP provides for staff from other regulatory agencies such as DOGGR and the SCAQMD to attend and present information to the public as demonstrated by past and recent CAP meetings.

**Analysis of Compliance and Effectiveness:**

The MACC held its first meeting on March 16, 2009. Subsequent meetings have been held on April 20, 2009, July 16, 2009, September 17, 2009, February 11, 2010, July 8, 2010, November 4, 2010, April 12, 2011, May 13, 2013, January 28, 2014, and March 29, 2016. MACC members include the following representative agencies:

- Culver City Fire Department (CCFD).
- County of Los Angeles
- Department of Regional Planning (DRP)
- Fire Department (LACoFD)
- Department of Public Works (DPW)
- Department of Public Health (DPH)
- State of California
- Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR)
- Department of Justice, Office of the Attorney General
- California Environmental Protection Agency
- Regional Water Quality Control Board (RWQCB)
- South Coast Air Quality Management District (SCAQMD)

Minutes from these meetings are available on the County web site at:  
[www.planning.lacounty.gov/baldwinhills/macc](http://www.planning.lacounty.gov/baldwinhills/macc).

Pursuant to this requirement, MACC meetings are facilitated by a meeting Chair, meetings are scheduled by the committee as deemed appropriate, MACC members are copied on all email oil field update correspondence, and any oil field documents requested by the MACC are submitted in a timely manner.

**New Technology:**

This provision is administrative in its intent outlining the requirements for the MACC, and a discussion of new technology is not applicable.

**Recommendations to Changes in Implementation:**

This requirement has been implemented, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

## 6.9 I. RELATED COUNTY CODE PROVISIONS

*The county code contains a number of provisions related to oil wells and oil field operations. Where the regulations of this section differ from any other provisions in the county code, these regulations shall supersede unless the contrary provisions are mandated by State law.*

### **Summary of Complaints:**

This provision is standard administrative County language to clarify jurisdiction on similar county code requirements; there have been no complaints on this provision.

### **Summary of Issues Raised by the Public:**

As noted above, this requirement is a standard administrative condition; no public issues have been noted on this provision.

### **Analysis of Compliance and Effectiveness:**

The provision is a standard County requirement to clarify jurisdiction between similar codes and regulations. The CSD was developed to augment and strengthen the existing requirements codified in the County code for oil and gas operations. The requirements of the CSD supersede other provisions unless mandated by State law. There have been no conflicts between contrary code provisions requiring the County to invoke this provision to date.

This provision is standard County permit language and has not been activated to date, and no further analysis is recommended.

### **New Technology:**

This provision is a standard County administrative requirement; a discussion of new technology is not applicable.

### **Recommendations to Changes in Implementation:**

This requirement has not been activated to date; however, no changes to implementation are recommended.

### **Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

## 7.0 Permitting (22.310.080)

This section of the CSD describes the requirements for additional permitting for activities not included in the CSD provisions.

### A. Ministerial Site Plan Review required

*The operator shall apply for and receive approval of a Ministerial Site Plan Review (Chapter 22.186) prior to any new drilling and redrilling. New drilling and redrilling approved through a director's review procedure shall be limited to no more than 53 wells per year, with the maximum number of newly drilled wells of that total, limited to 45 per year, except that during the first year following the effective date of the ordinance establishing this section, new drilling and redrilling shall be limited to no more than 24 wells. Approval through director's review for drilling new wells shall be limited to 600 wells over 20 years, beginning on the effective date of this ordinance. Drilling and redrilling shall be planned to avoid over concentration of such activities in one area in anyone year, if near developed areas. The director's review procedures shall also apply to emergency actions determined by the director as necessary to prevent an imminent hazard, or to other immediate measures required for the purposes of protecting health and safety. No new permits for drilling or redrilling shall be approved by the director unless the subject wells have been approved as part of an annual drilling Plan as described in Section 22.310.050.Z.3 (Annual Drilling, Redrilling, Well Abandonment, and Well Restoration Plan. Approval shall not be granted until copies of all related permits have been submitted to the director; other permits include, but are not limited to, the permits required by DOGGR, the county fire department, the county department of public works, the county sanitation district, RWQCB, SCAOMD, and other pertinent agencies identified by the director.*

### Summary of Complaints:

No complaints specific to this provision has been received by the County for the time period covered in this review.

### Summary of Issues Raised by the Public:

In part since no drilling has occurred at the IOF since June 2014, no public input on the number of wells allowed at the oil field has been received for the time period covered in this review. The number of wells provided for in this provision has been revised based on past public input and the Settlement Agreement, a summary of which is provided below.

### Analysis of Compliance and Effectiveness:

Provision 22.310.050.Z.3, *Drilling, Redrilling, and ReWorking Operations*, requires an annual submittal of a drilling Plan which identifies the number and other details of wells proposed to be drilled for a given year; however, it does not provide limits for the number of wells allowed on either an annual or total project basis. This provision provides the limits on wells to be drilled at the oil field on an annual basis and for the life of the CSD. These limits have been augmented by the requirements of the Settlement Agreement and the Annual Well Evaluation dated December 5, 2011. The maximum number of wells allowed per year under this provision is as follows:

- 53 new and re-drilled wells per year.
- New wells limited to 45 of the 53 well total.
- New and re-drilled wells limited to 24 for year 2009.
- 600 total wells for 20-year time frame starting at the adoption of the CSD.

The Settlement Agreement revised the annual well drilling limits and introduced the “Bonus Well” concept. The bonus wells program was developed to encourage moving well activities away from developed areas by establishing the area within 800 feet of any developed area as a target zone for well abandonment as opposed to well drilling activities. For each well abandoned in this target zone, the Settlement Agreement allowed for two new wells to be drilled outside the target zone. These “bonus wells” did not count against the annual new well limit, thus allowing for additional wells above the annual new well limit to encourage abandonment of well activities near developed areas. The Settlement Agreement also identified two drilling periods for well limits. These time periods were defined as before and after the first 50 wells are drilled, referred to as “Time Period One” and the “Full Operational Period”. In addition to reaching the 50-wells-drilled milestone, the Full Operational Period also required that the County determine that the CSD has been effective in protecting the health, safety, and general welfare of the public; this analysis, the *PXP Baldwin Hills Community Standards District Annual Well Increase Evaluation*, was completed in December 2011.

The *Annual Well Increase Evaluation* reviewed the following CSD compliance subject areas; noise, vibration, air emissions, odors, ground movement, visual/aesthetics, hazards/fire protection/emergency response, and ground water quality. The results of the review concluded that for these areas of review, the CSD has been effective in protecting the health, safety, and general welfare of the public. The 50 wells drilled milestone was reached in October 2011.

As discussed above, the oil field entered the Full Operational Period in December 2011; the revised well limits for the CSD are as follows:

- 35 new or re-drilled wells per year.
- 18 bonus wells per year.
- 53 total wells per year.
- 500 total wells through October 1, 2028 or during the remaining life of the CSD, whichever is later.

The actual number of wells drilled at the oil field through the end of 2018 is summarized in the table below.

<b>Number of Wells Drilled Since the Adoption of the CSD</b>			
<b>Year</b>	<b>Wells per Year</b>	<b>Bonus Wells Used</b>	<b>Cumulative Total</b>
2009	0	0	0
2010	19	0	19
2011	40	5	64
2012	20	0	84
2013	30	0	114
2014	18	0	132
2015	0	0	132
2016	0	0	132
2017	0	0	132
2018	0	0	132
<b>Total (through 2018)</b>	<b>127</b>	<b>5</b>	<b>132</b>

As shown in the above table, the number of wells drilled at the oil field was within the allowable limits of the CSD and the CSD as revised by the Settlement Agreement. The requirements for County and other agency approval of the drilling activities stipulated by this provision are met by



the annual submittal, review, and approval of the *Annual Drilling, Redrilling, Well Abandonment and Well Restoration Plan* required under Provision 22.310.050.Z.3.

The condition is considered fully effective at this time, and no further evaluation is recommended.

**New Technology:**

New technologies in oil well drilling and associated activities are discussed in the *Annual Drilling, Redrilling, Well Abandonment and Well Restoration Plan* as submitted to the County for review and approval.

**Recommendations to Changes in Implementation:**

The condition is considered fully effective at this time, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The language of this CSD provision has been augmented by the terms of the Settlement Agreement, and no additional changes to the CSD language are recommended.

**7.1 B. CONDITIONAL USE PERMIT (CUP) REQUIRED**

*Provided a conditional use permit (Chapter 22.158) has first been obtained and while such permit is in full force and effect in conformity with the conditions of such permit, the following uses may be established:*

*1. Drilling or redrilling that exceeds the maximum number allowed pursuant to a Ministerial Site Plan Review (Chapter 22.186);*

*2. Steam drive plant; and*

*3. New tanks with a capacity of greater than 5,000 barrels.*

**Summary of Complaints:**

This provision is administrative in its intent allowing for certain additional uses subject to a conditional use permit; no such permit has been obtained or applied for by the oil field operator to date. No complaints have been received by the County on the provision.

**Summary of Issues Raised by the Public:**

As noted above, this is an administrative requirement for a land use permit process that has not been implemented to date by the oil field operator; no input on this provision has been received by the County.

**Analysis of Compliance and Effectiveness:**

This provision is administrative in its intent and details specific uses allowed under a conditional use permit at the oil field. The operator has not obtained nor applied for such a permit to date. Drilling and redrilling activities at the oil field have been under the maximum number allowed by the CSD except for those wells allowed for under the Settlement Agreement dated July 15, 2011 and the Annual Well Evaluation dated December 5, 2011. A steam drive plant has not been built or proposed for the oil field and all new tanks constructed to date have been sized at 5,000 or less barrels capacity.

The condition is considered fully effective at this time, is administrative in its intent, and has not been activated to date; no further evaluation is recommended.

**New Technology:**

This condition is an administrative requirement and is linked to the conditional use permit process of the County. Any technological improvements the County deems appropriate to this provision may be implemented during the review and approval of the subject County permit.

**Recommendations to Changes in Implementation:**

This provision is administrative in its intent allowing for certain uses subject to a conditional use permit and has not been activated to date. No changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

**7.2 C. CONDITIONAL USE PERMIT (CUP) REQUIREMENTS**

*For those uses requiring a conditional use permit, in addition to the requirements of Chapter 22.158, the applicant shall substantiate to the satisfaction of the hearing officer that:*

- 1. The requested use is in compliance with the provisions of this section; and*
- 2. All reasonable measures were taken to reduce and minimize potential impacts from the proposed operation.*

**Summary of Complaints:**

This provision is administrative in its intent and has not been activated to date; no complaints have been received by the County on the provision.

**Summary of Issues Raised by the Public:**

As noted above, this is an administrative requirement for a land use permit process that has not been implemented to date by the oil field operator; no input on this provision has been received by the County.

**Analysis of Compliance and Effectiveness:**

This provision is administrative in its intent and details specific additional requirements applicable to the oil field regarding the approval of a conditional use permit (CUP). The operator has not applied for a CUP to date.

The condition is considered fully effective at this time, is administrative in its intent, and has not been activated to date; no further evaluation is recommended.

**New Technology:**

This condition is an administrative requirement and provides additional specific requirements to the conditional use permit process of the County applicable to the oil field. The provision requires that in addition to existing CUP requirements mandated by the County ordinance, any proposal for a new permit substantiate that *“All reasonable measures were taken to reduce and minimize potential impacts from the proposed operation.”* Therefore, new technologies

developed to minimize impacts from operation of the oil field can be required pursuant to the review and approval of the subject County permit.

**Recommendations to Changes in Implementation:**

This provision is administrative in its intent and allows for additional mitigation measures be required for any new CUP at the oil field. The provision has not been activated to date, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

As noted above, the existing CSD language allows for the County to require all reasonable measures to minimize impacts from operations at the oil field when a new CUP is approved. Therefore, no changes to the CSD language are necessary or recommended.

**7.3 D. APPLICATION WHERE VIOLATION EXISTS**

*No application required pursuant to this section shall be accepted for processing or approved where any existing use in the district is being maintained or operated by the operator or its agents in violation of any material provision of this Title 22.*

**Summary of Complaints:**

This provision is administrative in its intent requiring the operator to resolve any violations prior to the application of any new permit at the oil field. No complaints on this provision have been received by the County.

**Summary of Issues Raised by the Public:**

This provision has not been implemented to date, and the County has not received any input on this provision.

**Analysis of Compliance and Effectiveness:**

This provision is administrative in its intent and has not been implemented to date. The condition requires the operator to resolve any land use violations prior to the application of any new permit application at the oil field. The requirement also states that no permit application may be approved if such a violation exists.

The condition is considered fully effective at this time, is administrative in its intent, and has not been activated to date, and no further evaluation is recommended.

**New Technology:**

This condition is an administrative requirement linked to the County permitting process requirements; a discussion of new technology is not applicable.

**Recommendations to Changes in Implementation:**

This requirement is a County administrative requirement that has not been activated to date and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

## **8.0 Enforcement (22.310.090)**

This subsection of the CSD provides enforcement provisions that augment the enforcement procedures specified in Chapter 22.242 of the County Code. Section A details monetary amounts for violations and the procedures for payment and appeal of those violations and penalties. Section B is the administrative requirement documenting that access to all records and facilities for enforcement of the CSD be made available to the County, and Section C provides for access to the oil field for inspections or as deemed necessary by the County.

Two enforcement actions were taken by the County through this Periodic Review period. The first involved a follow-up enforcement action on October 22, 2014 (14-006243/EF141385) to CSD Provision 22.310.050.Y Storage of Hazardous Materials. The action followed a County Fire Department inspection that uncovered a violation involving the storage of hazardous materials. The violation involved a discrepancy between the location of the storage of hazardous materials as annotated in the oil field facility Hazardous Materials Business Plan document and the actual location of the stored hazardous materials as found on site during the inspection. The issue was corrected within 30 days and signed off by County Fire. No monetary penalty was assessed.

The second enforcement action, a Notice of Violation (NOV) for missing meteorological data (CSD Condition 22.310.050 B.10) was issued on November 12, 2018 (RPCE2018006074). The missing meteorological data issue was due to a download issue with the station data logger and was subsequently corrected, no monetary penalty was assessed.

The condition is considered fully effective at this time. There have been no issues regarding access to compliance documentation or for access to the oil field; no further evaluation is recommended.

## **9.0 Public Outreach (22.310.100)**

This section outlines the CSD requirements regarding communication with the public, community meetings and community relations.

### **9.1 A. COMMUNITY ADVISORY PANEL (“CAP”)**

*A community advisory panel shall be established by the director to foster communication about ongoing operations at the oil field and to allow the community representatives to provide input to the county and the operator.*

*1. CAP Members. The CAP may include representatives of the county, the city of Los Angeles, the city of Culver City, West Los Angeles College, the operator, the landowners, and each of the major neighborhoods surrounding the oil field (including Ladera Heights, Windsor Hills, Oak Park, View Park, Culver Crest, Blair Hills, and Raintree). The operator and each of the governmental entities previously referred to may each designate a representative to the CAP. Each landowner and neighborhood organization of the surrounding communities may submit a nomination to the director for appointment to the CAP. Where there is no neighborhood organization, a community resident may make a request to the director to be appointed to the CAP. School districts with schools in the vicinity of the oil field and the lessors may make a request to the director to have a representative appointed to the CAP.*

*2. CAP Meetings. The CAP shall determine its meeting schedule.*

*3. Documents Provided to the CAP. A notice of availability of all monitoring and compliance reports and results, all plans, audits and studies, and any other available documents that are required by this section shall be submitted to the CAP promptly after they are prepared or otherwise available. Copies of these reports, documents, and other items shall be provided to CAP members upon request except to the extent information therein may not be legally disclosed. Prior to each CAP meeting, the county shall provide to the CAP a list of all violations of the provisions of this section that have occurred since the last CAP meeting.*

#### **Summary of Complaints:**

CAP meetings have occurred approximately monthly since the first meeting on March 26, 2009. The County has received input on the CAP meetings as discussed below.

#### **Summary of Issues Raised by the Public:**

Input on the CAP process has been made during discussion at the CAP meetings and for comments solicited for the scoping of this Periodic Review. Several comments were made regarding CAP attendance, the need to update the CAP membership to allow new members and to have meeting guidelines. The County addressed the attendance and membership issue in 2014 whereby the Director of the DRP sent a letter out to CAP members reminding them of their obligations as a member of the CAP. Subsequently, several CAP members were removed allowing for potential new groups to submit applications for membership. As a result, the City of Los Angeles Office of Petroleum and Natural Gas Administration and Safety, Los Angeles Unified School District, and the Ladera Crest Homeowners Association recently joined the CAP. Guidelines for the CAP were created and approved by the CAP in June 2009.

Several comments involved moving the location of the CAP meetings and the use of a third-party facilitator. The location of the CAP meetings has been a topic at many recent meetings with the discussion of improving bicycle, pedestrian and mass transit access of the location of the meetings. The feasibility of several alternate locations has been debated, however during the July 25, 2019 CAP meeting, a vote to remain at the current location was passed. The CAP meetings are co-facilitated by members of the CAP, which are members of the public, consistent with the CAP bylaws. The bylaws allow for the CAP to elect a member to serve as facilitator or assistant facilitator at any time.

Comments were also received during the scoping of this document on information transparency, public notification, and public outreach. Section 22.310.100, *Public Outreach*, was specifically developed to provide information, notification, and outreach to the public on oil field operations. As noted in the discussion for 22.310.200.B, *Community Relations*, the oil field and DRP Baldwin Hills CSD websites contain over a hundred CSD compliance documents. Many of these documents are discussed at the monthly CAP meetings where public input is encouraged, and public comments are addressed by the operator or the County in a timely fashion. Further, pursuant to CSD 22.3120.050.Z.3, the County must consider comments made by the CAP on the *Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan* prior to approval of the plan.

Consistent with the CAP bylaws, the *“purpose and goal of the CAP is to foster communication about ongoing operations at the Inglewood Oil Field located in the Baldwin Hills, and to allow community representatives to provide input to the County and the operator of the oil field..”*. Members of the public may contact the County or their CAP community representatives for information, attend CAP meetings or contact the oil field ombudsperson for information on oil field activities. Community outreach is also accomplished by the annual neighborhood meetings and newsletter required under CSD 22.310.200.B.

**Analysis of Compliance and Effectiveness:**

The CAP was established to foster communication and ensure continued community input for the County and for operator. Twenty-one panel seats were allocated to the categories specified in subsection 22.310.100.A.1 by the Director of Planning. Nominations were accepted on a first-come, first-serve basis and the introductory meeting was held March 26, 2009. CAP membership is currently filled based on a metric made by the Director and published on June 13, 2017. Panelists on the CAP serve in a representative capacity and all meetings are open to the public. As noted above, bylaws were created and approved by the CAP on June 25, 2009. Current CAP members are designated from the following entities:

- Governmental Entities
  - Department of Regional Planning
  - City of Culver City
  - West Los Angeles College
  - City of Los Angeles
  
- Oil Field Operator
  - SPR
  
- Landowners
  - Vickers Family Trust
  - Cone Fee Family Trust

- Neighborhood Organizations (Recognized Homeowners Association)
  - Ladera Heights Civic Association
  - Windsor Hills HOA
  - United HOA (View Park)
  - Culver Crest Neighborhood Association
  - Blair Hills HOA
  - Raintree Community HOA
  - Baldwin Hills Estates HOA
  - Ladera Crest HOA
  
- Neighborhood Organizations (No Recognized Homeowners Association)
  - Baldwin Vista Homeowner
  
- School Districts
  - Los Angeles Unified
  - Culver City Unified
  
- Other Organizations
  - Windsor Hills Block Club
  - Community Health Council
  - Baldwin Hills Conservancy

The meeting schedule for CAP meetings is determined during the monthly meetings. Monitoring reports, compliance reports, plans, audits, studies, and other documents required by the CSD are provided to the CAP as required by subsection 22.310.100.A.3. Documentation made available to the CAP is typically posted on the Inglewood Oil Field website with some materials distributed at CAP meetings in hardcopy format. Meeting minutes and informational handouts are available at the County DRP web site.

The CAP, along with the other public outreach requirements of the CSD, provide several robust methods for both the dissemination of information to the public and for public involvement in the compliance and requirements of the CSD. Membership in the CAP is an ongoing process and potential new members may contact the Director of DRP for consideration of CAP membership at any time. As noted above, the bylaws of the CAP allow for the election of a new facilitator or assistant facilitator at the discretion of the CAP. The CAP allows for direct communication between the public, the County, other regulatory agencies, and the operator on oil field activities and CSD compliance documentation. The condition is considered fully effective at this time, and no further evaluation is recommended.

**Recommendations to Changes in Implementation:**

This requirement has been implemented, is ongoing, and allows for both new membership and new meeting facilitators. No changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

## **9.2 B. COMMUNITY RELATIONS.**

*1. Community Meetings. The operator shall hold community meetings on an annual basis to provide updates on oil operations.*

*2. Newsletter. The Operator shall publish an informational newsletter annually, which shall contain updated information on oil operations including drilling, re-drilling, maintenance, repair, and reworking activities and all recently granted conditional use permits or applications filed for conditional use permits for the oil field. The newsletter shall be mailed by the operator to all owners of property located within 1,000 feet of the outer boundary line; all owners of property within 1,000 feet of the perimeter of the district as shown in the records of the county assessor's office; to any person or entity who has filed a written request therefore with the director; and to neighboring cities. The operator shall also make these newsletters available on the oil field web site. The oil field web site address shall be publicized in each newsletter.*

*3. Oil Field Web Site. The operator shall maintain and update on a regular basis an oil field web site that shall include information on oil operations at the oil field, including drilling and production activities. All monitoring and compliance reports and results, plans, audits and studies, and any other available documents that are required by this section (except to the extent they contain information that may not legally be disclosed) shall be promptly posted on the Oil Field Web Site in pdf format.*

### **Summary of Complaints:**

The County did not receive any complaints on the community meeting, newsletter, or web site for the time period of this review.

### **Summary of Issues Raised by the Public:**

Input on community relations has been provided by the public at both Community Advisory Panel (CAP) meetings and for comments solicited for the Periodic Review. Specific comments include requests for better communication between the oil field operator and the public and better communication between the County and the public. The public has also requested that documentation that is posted to the oil field web site should be made available sooner. Input was also received on the complaint process; see the discussion for Provision 22.310.060.G for more detail.

### **Analysis of Compliance and Effectiveness:**

Community meetings have occurred annually since the adoption of the CSD with the first meeting occurring on May 26, 2009. Meetings for the years 2014 through 2018 occurred on November 18, 2014, November 10, 2015, November 15, 2016, November 8, 2017, and October 20, 2018. The 2018 meeting occurred at the oil field on a Saturday afternoon and included lunch and a new format. The new format provided oil field and County staff availability to answer questions or discuss topics as opposed to a formal presentation. The newsletters required by subsection B.2 have been prepared annually and are mailed out prior to the community meetings with noticing of the forthcoming meeting date, time, and location. The newsletters are distributed to the public as required and are posted on the oil field web site.

The oil field web site, [www.inglewoodoilfield.com](http://www.inglewoodoilfield.com), was launched on January 19, 2010. The web site includes information on the history and future of the oil field, oil field operations, operational plans, compliance plans, community and environmental sections, and information on the CSD. The web site contains over 100 documents related to operational and compliance information with the documentation posted in .pdf format as required by this provision. The web site



provides contact information and includes an interactive email system to allow for direct input to the operator for questions and information.

Most of the input received on community relations involved the previous operator. The current operator has improved both the quantity and quality of information provided to the public, updated the web site and revised the approach to the annual community meeting.

The condition is considered fully effective at this time with the community meetings, newsletter and web site implemented and ongoing; and no further evaluation is recommended.

**Recommendations to Changes in Implementation:**

This requirement has been implemented, however, to improve the communication of oil field activities to the public, it is recommended that the operator post updates of oil field incidents on the oil field website.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

**9.3 C. OMBUDSPERSON**

*The operator shall designate employees or authorized agents to serve as ombudspersons to respond to questions and concerns concerning the oil operations. Each ombudsperson shall be familiar with all the provisions of this section and all conditions of approval related to permits and approvals issued by the county or the State of California. It shall be the further responsibility of the ombudsperson to facilitate, to the extent feasible, the prompt resolution of any issues that may arise relating to the above-stated matters or the impacts of the oil operations. The name, title, email address, and telephone number of the ombudsperson shall be posted on the oil field web site, prominently displayed in the newsletter, distributed twice per year to the CAP and MACC, and provided to any other persons requesting such information. An ombudsperson shall be available at all times and shall respond within one hour after an initial call. An ombudsperson shall also meet at reasonable times with interested parties in an attempt to resolve issues related to oil operations. An ombudsperson shall have authority to initiate a response on behalf of the operator in all foreseeable matters. The operator shall be required to maintain a written log of all calls to the ombudspersons registering complaints or concerns regarding oil operations or other matters. The log shall include the complainant's name, date, time, phone number, nature of complaint, and the response or resolution offered. A copy of the log shall be provided to the director, the MACC, and the CAP on a quarterly basis.*

**Summary of Complaints:**

No complaints on the ombudsperson provision have been received by the County.

**Summary of Issues Raised by the Public:**

As noted in the discussion for Provision J.2, *Community Relations*, comments on the interface between the operator and the public have been provided at both Community Advisory Panel (CAP) meetings and for comments solicited for the Periodic Review. The main issue raised by the public involved the ombudsperson from the previous operator regarding the information provided by the ombudsperson at the CAP meetings. The public requested that more information be provided and that more detail be provided on the information that is presented.

**Analysis of Compliance and Effectiveness:**

The ombudsperson system has been in place since the adoption of the CSD and serves as primary contact between the oil field operator and the community. The ombudsperson contact information is included in the annual newsletters and in the agendas for CAP meetings. In addition to the ombudsperson, the oil field maintains two staff members on an on-call basis to coordinate and respond to calls from the public or regulatory agencies regarding oil field operations. The current ombudsperson, Ms. Amanda Parsons is joined by Mr. Dan Taimuty. Mr. Taimuty has a technical background and is therefore able to provide a much-improved level of information about oil field operations. As such, the information provided by the operator at CAP meetings has improved in both timeliness and technical accuracy from the previous operator. The ombudsperson contact information is:

Ms. Amanda Parsons  
Email: AParsons@sentinelpeakresources.com  
Phone: 1-800-766-4108

Sentinel Peak Resources  
5640 S. Fairfax Ave.  
Los Angeles, CA 90056

The County will remain vigilant to ensure that the Operator continues to provide information to the public through the ombudsperson as appropriate. The condition is considered fully effective at this time and no further evaluation is recommended.

**Recommendations to Changes in Implementation:**

This requirement has been implemented, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

## **10.0 Modifications to Development Standards (22.310.110)**

This subsection of the CSD lists the requirements and permit processing procedures for a request for a modification to the development standards specified in subsection 22.310.050 of the CSD. The County may approve a modification to these standards if the oil field operator can provide documentation that satisfactorily meets the criteria specified in this provision. Subsections A through D require that a proposed modification be necessary for a substantial property right of the operator, that the modification will not create an adverse safety impact to the community or environment, the modification will not be contrary to the improvements from or purpose of the CSD, and that the proposed change be consistent with the County General Plan and permitting requirements.

Subsections A through D describe specific requirements for the application, noticing, permit processing procedure, notification of decision, and appeal procedures, respectively, for a modification of development standards proposal. No proposal or application for a modification of the development standards of CSD Section 22.310.050 has been applied for to date. The condition is considered fully effective at this time, is administrative in its intent, and has not been activated to date; no further evaluation is recommended.

## 11.0 Implementation Provisions (22.310.120)

This subsection of the CSD lists the various implementation plans and other stipulations required for initial compliance along with a submittal schedule for the subject compliance. The schedule requirements for the Plan and compliance submittals required under this provision range from 30 days to two years following the effective date of the CSD (October 28, 2008). All plans and initial requirements of this CSD subsection were completed; therefore, this requirement is no longer applicable and Periodic Review is not merited. A discussion of the ongoing implementation of the plans and conditions required by this provision is provided in the review and analysis of CSD Provisions 22.310.050, *Oil Field Development Standards*, 22.310.070 H, *Multiple Agency Coordination Committee*, and 22.310.100, *Public Outreach*. The table below provides a summary of the plans and initial compliance requirements of this CSD subsection along with the associated submittal date.

<b>CSD Section 22.310.120 Compliance Summary</b>		
CSD Section 22.310.120 Implementation Provision	Submittal Schedule Requirement (Days)	Submittal or Completion Date
<b>A. Fire Protection and Emergency Response</b>		
1. Fire Protection Audit	120	March 3, 2009
2. "CAN" System	120	March 2009
3. Spill Containment Response Training	90	February 4, 2009
<b>2. Air Quality and Public Health</b>		
4. Odor Minimization Plan	90	February 2009
5. Air Monitoring Plan	90	February 2009
6. Oil Tank Pressure Monitoring and Venting	180	May 26, 2009
7. Meteorological Station	120	March 26, 2009
8. Fugitive Dust Control Plan	120	March 2009
9. Well Amortization Report	120	March 2009
<b>3. Safety and Risk of Upset</b>		
10. Propane and Natural Gas Liquids Bullet Fireproofing	90	February 23, 2009
11. Gas Plant Audit	120	March 11, 2009
12. Oil Tank Secondary Containment	One Year	January 23, 2010
13. Retention Basins	120	January 23, 2010
14. Above Ground Piping	One Year	January 23, 2010
<b>4. Geotechnical</b>		
15. Accelerometer	180	May 26, 2009
16. Tank Seismic Assessment	180	May 26, 2009
17. Erosion Control Plan	180	May 26, 2009
18. Accumulated Ground Movement Study	90	May 26, 2009
19. Ground Movement Monitoring Plan	90	May 26, 2009
<b>5. Noise Attenuation</b>		
20. Drilling Quiet Mode Plan	90	February 2009

Baldwin Hills Community Standards District (CSD)

<b>CSD Section 22.310.120 Compliance Summary</b>		
CSD Section 22.310.120 Implementation Provision	Submittal Schedule Requirement (Days)	Submittal or Completion Date
21. New Gas Plant Flare	120	March 29, 2009
<b>6. Biological Resources</b>		
22. Special Status Species and Habitat Protection Plan	180	May 2009
23. Emergency Response Plan	180	February 17, 2010
<b>7. Cultural/Historic Resources</b>		
24. Worker Training	120	March 26, 2009
25. Construction Treatment Plan	180	May 2009
<b>8. Landscaping, Visual Screening, and Irrigation</b>		
9. Oil Field Waste Removal	180	May 2009
<b>10. Signs</b>		
26. Perimeter Identification Signs	60	May 18, 2009
27. Oil Field Entrance Sign	30	May 18, 2009
28. Other Required Signs	60	May 18, 2009
29. Well Identification Signs	180	May 18, 2009
30. No Littering Signs	120	May 18, 2009
11. Painting	Two Years	November 12, 2012
12. Water Management Plan	180	May 2009
13. Groundwater Monitoring	One Year	August 2009
14. Oil Field Cleanup and Maintenance	180	May 18, 2009
15. Storage of Hazardous Materials	30	December 22, 2008
16. Drilling, Redrilling, Well Abandonment, and Well Restoration Plan	60	January 2009
<b>17. Processing Operations</b>		
31. Pipelines	180	May 26, 2009
32. Active Pipeline Plot Plan	One Year	December 26, 2009
18. Tanks	180	May 26, 2009
<b>19. Monitoring and Compliance</b>		
33. Environmental Quality Assurance Program (EQAP)	90	February 25, 2009
34. Safety, Inspection, Maintenance, and Quality Assurance Program (SIMQAP)	180	May 26, 2009
20. Administrative Items (MACC)	60	March 16, 2009
<b>21. Public Outreach</b>		
35. Community Advisory Panel (CAP)	60	March 26, 2009
36. Oil Field Web Site	90	January 1, 2009
37. Community Meeting	180	May 26, 2009

Appendix A  
Public Scoping Comments

## Periodic Review Scoping Comments

<b>Comment #</b>	<b>Issue Area</b>	<b>Brief Description</b>	<b>Response</b>
CAP-1	Ground Movement	The subsidence and ground movement were issues noted by CAP as an area for discussion in Periodic Review although DOGGR has not provided updated input on the subject to date.	See Periodic Review discussion on CSD requirement 22.310.050.D.5.
CAP-2	Idle Wells	It was recommended that the DOGGR updates to idle well regulations be considered in the review.	See Periodic Review discussion on CSD requirement 22.310.050.EE.
CAP-3	Ground Movement	Recommendation that the operator utilize a separate consultant from the consultant that prepares the annual ground movement reports to perform property damage investigations.	See Periodic Review discussion on CSD requirement 22.310.050.D.5.
EG1-1	Spills	Two oil field incidents between November 2018 and April 2019.	See Periodic Review discussion on CSD requirements 22.310.050.A, 22.310.050.B, and 22.310.050.C.
EG1-2	Air Quality, Health, Environmental Justice	Request to consider a provided list of reports on various aspects of air quality and health issues from other oil fields/areas, the CARB SNAPS Study and the DPH Health Assessment and Environmental Justice Study.	The Periodic Review is a comprehensive review of the provisions of the CSD to determine if the provisions of this section are adequately protecting the health, safety, and general welfare. As such, studies on other oil wells, oil fields and other areas are outside the scope of the Periodic Review. The information in these studies may be helpful to the County as it moves forward with the forthcoming amendment to the County Code for oil and gas operations. The CARB SNAPS project and the DPH Health Assessment and Environmental Justice Study have not been completed to date. Impacts regarding air quality and health issues are discussed in the applicable Periodic Review sections.
EG1-3	Climate Change	Climate Change and fossil fuels.	The CSD does not have a requirement specific to GHG emissions as these pollutants are under the jurisdiction of CARB and the SCAQMD. Current GHG emissions at the IOF are under the SCAQMD's 10,000 metric ton CO2 equivalent per year threshold for industrial facilities as documented on Annual Emissions Reports (AERs) submitted to SCAQMD.

## Periodic Review Scoping Comments

<b>Comment #</b>	<b>Issue Area</b>	<b>Brief Description</b>	<b>Response</b>
EG1-4	Wildlife Parks	Kenneth Hahn State Park is habitat for wildlife and the Baldwin Hills Master Plan goal is to transform the IOF into park space.	Comment acknowledged, however, analysis of a future park at the IOF is outside the scope of the Periodic Review.
EG1-5	Tribal Cultural Resources	Request the consultation with Tongva Nations regarding any potential impacts to cultural resources.	See Periodic Review discussion on CSD requirement 22.310.050.H.
EG1-6	Information	Access to information.	See Periodic Review discussion on CSD requirements 22.310.100 and note that two web sites have been established and are maintained to provide information to the public on oil field compliance along with monthly CAP meetings whereby information is provided to the public.
KKG-1	Ground Movements	Recommendation that drilling activities be ceased due to earthquakes.	A definitive link between drilling oil wells and earthquakes has not been established. Further, CAP meetings have had earthquake experts, including a CalTech professor, discuss this topic and have provided information on oil drilling not being a significant cause of earthquakes. In addition, this determination is outside the scope of the Periodic Review.
KKG-2	Setbacks	Recommendation for 2,500-foot setback for drilling.	The CSD provides setback distances based on the analysis conducted for the Baldwin Hills CSD EIR. The County has not received any complaints or issues from the existing setback distances for the IOF. No wells have been drilled at the IOF since June 2014. The County is assessing the setback issue as part of the update to the County oil code and results of that process can be reviewed regarding the CSD when that process is completed.
KKG-3	ECC	Recommendation for a different entity from MRS be the next ECC.	Comment acknowledged. Note that the ECC must be approved by, and report to, the Director of DRP.



## Periodic Review Scoping Comments

Comment #	Issue Area	Brief Description	Response
FFLA-1	Health/Cancer Risk	The CSD EIR Health Risk Assessment and the MATES studies completed by SCAQMD show CSD regulations are not working to protect the public from cancer risk.	The referenced cancer risk information in the comment is not accurate. Page ES-2 of the MATES-IV Final Report states <i>“The levels of air toxics continued to decline compared to previous MATES studies. The most dramatic reduction is in the level of diesel particulate, which showed 70% reduction in average level measured at the 10 monitoring sites compared to MATES III.”</i> Further, the reports states <i>“About 90% of the risk is attributed to emissions associated with mobile sources, with the remainder attributed to toxics emitted from stationary sources, which include large industrial operations such as refineries and metal processing facilities, as well as smaller businesses such as gas stations and chrome plating”</i> ; note that the IOF is not included in this list of primary sources. In addition, the referenced cancer risks noted in the comment were for total risk from all sources in the LA Basin, not the IOF. The mitigated cancer risk for the IOF was calculated at 7.5 and re-calculated by the STI Air Study in 2014 at 6.7, both values are below the 10 in a million criteria threshold.
FFLA-2	Revised Regulations	Revised regulations should include safety risks.	The Periodic Review is an analysis of the existing CSD regulations and does not propose revised regulations unless the analysis determines a need for such a revision. Safety risk was analyzed in the Baldwin Hills CSD EIR and mitigation measures were developed and adopted in the CSD.

## Periodic Review Scoping Comments

Comment #	Issue Area	Brief Description	Response
FFLA-3	Earthquakes	Wastewater injection well cause earthquakes, therefore, their use at the IOF should cease.	The referenced earthquake issues caused by injection wells in the Midwest have been determined to be related to unbalanced extraction/injection practices. Water injection to an area without any fluid extraction activities can cause pressure of the reservoir, and potentially, earthquakes. The wastewater injection practices at the IOF are balanced with the extraction activities and are monitored and approved by DOGGR. In addition, CSD Provision 22.310.050.D.5 provides for ground movement surveys and monitoring. The ground movement reports are reviewed by County Public Works and DOGGR.
FFLA-4	Fire and Explosions	Reference to a list of explosions and fires at various locations.	The referenced incidents involved five high pressure natural gas operations in Pennsylvania and other incidents involving natural gas. The IOF is not a high-pressure gas facility. Note that the referenced April 1, 2019 oil spill at the IOF did not reach Ballona Creek as documented by the LA County Fire Department.
FFLA-5	Earthquakes and Pipeline Safety	Recommendation for testing and inspection of pipelines.	The testing of pipelines and valves at the IOF is part of normal oil field operations and is required by the regulations under the CSD, the DOGGR and the SCAQMD. Encasing such infrastructure in concrete is not feasible because the equipment needs to be accessible for maintenance, inspection and safety testing.
FFLA-6	Bonding Insurance	Bonding, insurance, and indemnification should be required.	See Periodic Review discussion on CSD requirement 22.310.070.G. subsections B, C, D, and E.
FFLA-7	CAN System	Request that the CAN system be implemented, and that evacuation plans be prepared.	The CAN system is fully operational and is tested on an annual basis. Evacuation plans for the public is beyond the scope of the CSD and any such plans would be administered by the applicable Fire and Police agencies. See discussion on CSD requirement 22.310.050.A.

## Periodic Review Scoping Comments

Comment #	Issue Area	Brief Description	Response
FFLA-8	Climate Change	Climate change requires a sunset date for oil field operations and a move to fossil free energy.	Climate change, sea level rise and other associated issues are beyond the scope of the Periodic Review. Instigating a moratorium on the activities at the IOF or a sunset data for operations is a legal issue and beyond the scope of the Periodic Review analysis. The CSD does not have a requirement specific to GHG emissions as these pollutants are under the jurisdiction of CARB and the SCAQMD. Current GHG emissions at the IOF are under the SCAQMD's 10,000 metric ton CO2 equivalent per year threshold for industrial facilities as documented on Annual Emissions Reports (AERs) submitted to SCAQMD.
SC-1	Oil Field Operations	Ban well stimulation, enhanced oil recovery, and wastewater injection.	Banning of permitted and regulated operations is a legal issue and beyond the scope of the Periodic Review analysis.
SC-2	Permitting	End permitting of wells and infrastructure.	Banning of permitted and regulated operations is a legal issue and beyond the scope of the Periodic Review analysis.
SC-3	Setbacks	Recommendation for a 2,500-foot setback.	The CSD provides setback distances based on the analysis conducted for the Baldwin Hills CSD EIR. The County has not received any complaints or issues from the existing setback distances for the IOF. No wells have been drilled at the IOF since June 2014. The County is assessing the setback issue as part of the update to the County oil code and results of that process can be reviewed regarding the CSD when that process is completed.

## Periodic Review Scoping Comments

Comment #	Issue Area	Brief Description	Response
SC-4	Monitoring	Request for monitoring.	<p>The CSD requires a variety of monitoring programs including air quality/odor monitoring around the gas plant, storm water testing, groundwater monitoring, fugitive emissions inspections and ground movement surveys. In addition, the CSD provides for paleontological, noise, and vibration monitoring if determined to be necessary by County DRP or County DPH. Further, the Environmental Compliance Coordinator performs inspections of the oil field and is available to respond as necessary to events or issues at the oil field.</p> <p>Regarding air quality monitoring, the STI Air Quality study, completed in December 2014, provided a site-specific air quality monitoring program for air toxics utilizing four monitoring locations. Each monitoring station included both air quality and meteorological instrumentation. Results of the study were consistent with the air quality impact analysis in the Baldwin Hills CSD EIR and the studies completed by the SCAQMD in the MATES programs. The County is looking forward to the forthcoming CARB SNAPS monitoring effort scheduled to begin in late 2019. The County will review the results of the SNAPS monitoring effort to determine the applicability of additional air quality monitoring at the oil field.</p>
SC-5	ECC	Request for public input on oil field monitor.	The current ECC is a third-party contractor approved by the Director of DRP.
SC-6	Spill Plans	Recommendation for site specific spill plans.	As required by the CSD, the IOF has a site-specific Emergency Response Plan (ERP) and a site-specific Spill Prevention, Control, and Countermeasures Plan (SPCC). See discussion on CSD Provisions 22.3010.050 A.2, A.3 and Q.2.

## Periodic Review Scoping Comments

Comment #	Issue Area	Brief Description	Response
SC-7	Community Safety Plan	Request for a community safety plan and notification.	The CAN system for community notification is fully operational and is tested on an annual basis. Evacuation plans for the public is beyond the scope of the CSD and any such plans would be administered by the applicable Fire and Police agencies. See discussion on CSD requirement 22.310.050.A.
SC-8	Financial Safeguards	Request for financial safeguards.	See Periodic Review discussion on CSD requirement 22.310.070.G. subsections B, C, D, and E.
SC-9	Oil Operations	Request to phase out oil operations.	Phasing out of permitted and regulated operations is a legal issue and beyond the scope of the Periodic Review analysis.
SC-10	Oil Field Incidents	Reference to several oil field incidents.	Note that this Periodic Review covers the time frame from 2014 through 2018. The two incidents noted in the comment in that time frame are discussed in the Periodic Review in Provisions 22.310.050 C.4 and CC.
SC-11	Setbacks	Recommendation for a 2,500-foot setback.	The CSD provides setback distances based on the analysis conducted for the Baldwin Hills CSD EIR. The County has not received any complaints or issues from the existing setback distances for the IOF. No wells have been drilled at the IOF since June 2014. The County is assessing the setback issue as part of the update to the County oil code and results of the that process can be reviewed regarding the CSD when that process is completed.
SC-12	Ongoing Studies	Request for SNAPS and DPH Health Assessment and Environmental Justice Study be included in the future.	This Periodic Review covers the time frame from 2014 through 2018, the referenced studies have not been completed. Results of the studies mentioned will be considered in future periodic reviews as appropriate.

## Periodic Review Scoping Comments

Comment #	Issue Area	Brief Description	Response
SC-13	Monitoring	Request for monitoring.	<p>The CSD requires a variety of monitoring programs including air quality/odor monitoring around the gas plant, storm water testing, groundwater monitoring, fugitive emissions inspections and ground movement surveys. In addition, the CSD provides for paleontological, noise, and vibration monitoring if determined to be necessary by County DRP or County DPH. Further, the Environmental Compliance Coordinator performs inspections of the oil field and is available to respond as necessary to events or issues at the oil field.</p> <p>Regarding air quality monitoring, the STI Air Quality study, completed in February 2015, provided a site-specific air quality monitoring program for air toxics utilizing four monitoring locations. Each monitoring station included both air quality and meteorological instrumentation. Results of the study were consistent with the air quality impact analysis in the Baldwin Hills CSD EIR and the studies completed by the SCAQMD in the MATES programs.</p> <p>The County is looking forward to the forthcoming CARB SNAPS monitoring effort scheduled to begin in late 2019. The County will review the results of the SNAPS monitoring effort to determine the applicability of additional air quality monitoring at the oil field.</p>
SC-14	Climate Change	Discussion on climate change.	<p>Climate change, sea level rise and other associated issues are beyond the scope of the Periodic Review. The CSD does not have a requirement specific to GHG emissions as these pollutants are under the jurisdiction of CARB and the SCAQMD.</p> <p>Current GHG emissions at the IOF are under the SCAQMD's 10,000 metric ton CO2 equivalent per year threshold for industrial facilities as documented on Annual Emissions Reports (AERs) submitted to SCAQMD.</p>

## Periodic Review Scoping Comments

Comment #	Issue Area	Brief Description	Response
SC-15	Wildlife Parks	Kenneth Hahn State Park is habitat for wildlife and the Baldwin Hills Master Plan goal is to transform the IOF into park space.	Comment acknowledged, however, analysis of a future park at the IOF is outside the scope of the Periodic Review.
SC-16	Information Transparency	Requests for information transparency and to move the location of the CAP meetings.	See Periodic Review discussion on CSD requirements 22.310.100 and note that two web sites have been established and are maintained to provide information to the public on oil field compliance along with monthly CAP meetings whereby information is provided to the public.
EG2-1	Oil Field Incidents	Reference to several oil field incidents.	The two incidents noted in the comment in that time frame are discussed in the Periodic Review in Provisions 22.310.050 C.4 and CC.
EG2-2	Health and Environmental Justice Studies	Comment provides a list of studies regarding health and environmental justice and the oil industry.	Comment acknowledged. Note that several studies specific to the Inglewood Oil Field have been completed and the SNAPS and DPH Health Assessment and Environmental Justice Study are forthcoming.
EG2-3	Ongoing Studies	Request for SNAPS and DPH Health Assessment and Environmental Justice Study be included in the future.	This Periodic Review covers the time frame from 2014 through 2018, the referenced studies have not been completed.
EG2-4	Climate Change	Discussion on climate change.	Climate change, sea level rise and other associated issues are beyond the scope of the Periodic Review. The CSD does not have a requirement specific to GHG emissions as these pollutants are under the jurisdiction of CARB and the SCAQMD. Current GHG emissions at the IOF are under the SCAQMD's 10,000 metric ton CO2 equivalent per year threshold for industrial facilities as documented on Annual Emissions Reports (AERs) submitted to SCAQMD.
EG2-5	Wildlife Parks	Kenneth Hahn State Park is habitat for wildlife and the Baldwin Hills Master Plan goal is to transform the IOF into park space.	Comment acknowledged, however, analysis of a future park at the IOF is outside the scope of the Periodic Review.
EG2-6	Tribal Cultural Resources	Request the consultation with Tongva Nations regarding any potential impacts to cultural resources.	See Periodic Review discussion on CSD requirement 22.310.050.H.

## Periodic Review Scoping Comments

Comment #	Issue Area	Brief Description	Response
EG2-7	Information Transparency	Requests for information transparency and to move the location of the CAP meetings.	See Periodic Review discussion on CSD requirements 22.310.100 and note that two web sites have been established and are maintained to provide information to the public on oil field compliance along with monthly CAP meetings whereby information is provided to the public.
SPR-1	Regulatory Oversight	Comment notes the IOF is overseen by numerous Federal, State and local agencies in addition to the CSD which is unique to the IOF.	Comment acknowledged.
SPR-2	CAP	Comment notes the CAP provides information to the public, has met over 100 times, and is a process unique to the CSD.	Comment acknowledged; the CAP is discussed in the Periodic Review Provision 22.310.100.A.
SPR-3	Ground Movement Surveys	Comment describes the ground movement survey process and agency oversight.	Comment acknowledged; the CAP is discussed in the Periodic Review Provision 22.310.050.D.5.
SPR-4	Groundwater Monitoring	Comment describes the groundwater monitoring process and agency oversight.	Comment acknowledged; the CAP is discussed in the Periodic Review Provision 22.310.050.S.
SPR-5	Stormwater Monitoring	Comment describes the stormwater monitoring process and agency oversight.	Comment acknowledged; the CAP is discussed in the Periodic Review Provision 22.310.050.Q.
SPR-6	CSD Provisions	Statement that the CSD meets the goals of the Periodic Review.	Comment acknowledged.
SPR-7	Oil Field Studies	Comment notes recent studies and health assessments on various oil field activities.	Comment acknowledged.
SPR-8	Setbacks	Comment notes that the CSD has setback requirements and that larger setbacks such as a 2,500-foot setback does not provide additional safety and would provide a negative economic impact to the community.	Comment acknowledged. The County has not received any complaints or issues from the existing setback distances for the IOF. No wells have been drilled at the IOF since June 2014. The County is assessing the setback issue as part of the update to the County oil code and results of the that process can be reviewed regarding the CSD when that process is completed.
CC-1	Well Stimulation	Request the CSD prohibit well stimulation techniques.	Prohibition of permitted and regulated operations is a legal issue and beyond the scope of the Periodic Review analysis. It should be noted that no drilling has occurred at the oil field since June 2014 and well stimulation as defined under SB4 is not occurring at the Oil field.



## Periodic Review Scoping Comments

Comment #	Issue Area	Brief Description	Response
CC-2	Landscaping	Request for additional landscaping plans and landscaping for Culver City viewshed.	The landscaping pursuant to CSD Provision has been completed as discussed in the Periodic Review Provision 22.310.050.J. Note that Culver City was a participant in the Settlement Agreement dated July 2011 where an enhanced landscaping plan was approved by the agreement of all participants. In addition, the Culver City Inglewood Oil Field Specific Plan Draft EIR determined that with the implementation of Drilling Regulations, the aesthetic impacts to scenic vistas and aesthetic impacts to the existing visual character of the Culver City IOF would be less than significant and no mitigation was required. No drilling has occurred in the City portion of the IOF since the implementation of the CSD.

## Periodic Review Scoping Comments

Comment #	Issue Area	Brief Description	Response
CC-3	Funding of Compliance Studies	Funding should be increased for various technical studies including the Public Health Study, ground movement and air quality studies.	<p>The Public Health Study is administered and funded by the DPH as stipulated by the Settlement Agreement; the CSD does not fund these studies. The Air Quality study funding amount was determined in the Settlement Agreement at \$250,000 as specified in Term 8 of the agreement. Note that Culver City was a participant and agreed to the conditions of the Settlement Agreement. The comment statement “...that many of the studies conducted under the CSD, including the Public Health, Ground Movement, and Air Quality Studies lacked sufficient funding to produce an accurate and meaningful analysis of these important issues” is not accurate. These studies have been peer reviewed by issue area experts, for example, the Air Quality Study was reviewed by staff at the SCAQMD and the ground movement studies are reviewed by DPW and DOGGR staff. The reports are accurate and provide important data in the understanding of the potential environmental impacts of oil field operations. The draw down account, Provision 22.310.070.B, is used to pay the costs of review of the technical reports required by the CSD. If review of the subject reports determines additional or expanded studies are necessary, the County can require such reports. The County has not made that determination for any of the studies completed pursuant to CSD requirements for this Periodic Review period.</p>
CC-4	Public Notice/Notifications	The public outreach provisions of the CSD are not sufficient.	Section 22.310.100 of the CSD provides for public outreach to foster communication about ongoing operations at the IOF and allow for public input to the County and the operator. The provisions of Section 22.310.100 include the CAP, community meetings, a newsletter, a web site, and a designated ombudsperson. See section 22.310.100 of the Periodic Review.

## Periodic Review Scoping Comments

Comment #	Issue Area	Brief Description	Response
CC-5	Ground Movement Survey	The existing ground movement studies are not adequate and do not provide enough data.	<p>The comment that the County has “...accepted, without clear evidence, the conclusion of the Oil Field Operator” on ground movement at the IOF is not accurate. The ground movement reports are not prepared by the operator nor does the operator provide a determination on same to the County. Per CSD Provision 22.310.050, the ground movement surveys and reports are prepared by a California-licensed surveyor in collaboration by a California-registered professional petroleum engineer, registered geotechnical engineer, and certified engineering geologist.</p> <p>The comment that <i>“This lack of a clear conclusion seems to allow the Oil Field Operator to deny any potential liability for property damage that may originate from operations related to the Oil Field, including conditions of subsidence”</i> is not accurate. CSD Provision 22.310.050 provide for multiple review by County DRP, County Public Works, and DOGGR all claims or complaints regarding a property damage due to upward or downward movement in the vicinity of the oil field.</p> <p>The comment <i>“Although this issue has been raised repeatedly through CAP, it does not appear that the County has taken steps to make any progress toward a satisfactory resolution of this issue”</i> is not accurate. The County has required the operator to provide the geotechnical data required by DOGGR and that data has been submitted to DOGGR. Additional ground movement surveys are required and are completed on an annual basis and DOGGR has not required any other additional information to date.</p>
CC-6	MACC Meetings	Request that the CAP and the MACC meet on an annual basis.	The MACC meeting schedule is determined by MACC members, see Periodic Review discussion on CSD Provision 22.310.070.H.

## Periodic Review Scoping Comments

Comment #	Issue Area	Brief Description	Response
CC-7	Emergency Response	Periodic Review should include review of ERP, discuss neighborhood evacuation plans. Fire Department should do unannounced drills.	The ERP is discussed in CSD Provision 22.310.050.A.3. Neighborhood and/or public evacuation plans are under the jurisdiction of the applicable Fire and Police departments under those agencies incident command system, including the Culver City Fire Department, and therefore not part of the CSD requirements. Annual and unannounced drills by County Fire is provided for in CSD Provision 22.310.060.D. This issue was noted in the first Periodic Review document, see applicable Periodic Review recommendation.
CC-8	Air Quality, GHGs, and Public Health	Request for an updated air quality study and assessment of GHGs. Periodic Review schedule.	An updated air quality/air toxics study was completed in December 2014 and an additional study, the CARB SNAPS Study, is scheduled for 2020. See Periodic Review discussion for CSD Provision 22.310.050.B. Current GHG emissions at the IOF are under the SCAQMD's 10,000 metric ton CO2 equivalent per year threshold for industrial facilities as documented on Annual Emissions Reports (AERs) submitted to SCAQMD. See discussion for CSD Provision 22.310.050.B. CSD Provision 22.310.070.G.7.2 allows for the Periodic Review to be conducted more frequently than every 5 years.
CC-9	New Technology	The Periodic Review should include discussions on new technology.	New technology is discussed for every applicable CSD Provision in the Periodic Review.
CC-10	Insurance and Bonding	The Periodic Review should include review of insurance and bonding requirements.	Insurance and bonding issues are discussed in the discussion for CSD Provision section 22.310.070, specifically subsections D and E.

## Periodic Review Scoping Comments

Comment #	Issue Area	Brief Description	Response
CC-11	CAP	CAP, guidelines, management and membership.	Guidelines for the CAP were created and approved by the CAP in June 2009. The Director of the DRP sent a letter out to CAP members in 2014 reminding them of their obligations as a member of the CAP. See Periodic Review discussion for Provision 22.310.100.A.
CC-12	Climate Change DOGGR Regulations	Periodic Review should include updates to DOGGR and GHG regulations.	Updated DOGGR regulations as discussed in applicable sections of the Periodic Review. Current GHG emissions at the IOF are under the SCAQMD's 10,000 metric ton CO2 equivalent per year threshold for industrial facilities as documented on Annual Emissions Reports (AERs) submitted to SCAQMD.
DPH-1	CAP	Request for third party CAP facilitator.	The comment that the County is the facilitator of the CAP meetings is not accurate. The CAP meetings are facilitated by a member of the CAP, which are members of the public, consistent with the CAP bylaws: <i>"The members of the CAP shall, from time to time, elect members to serve as facilitator and assistant facilitator. The facilitator (or the assistant, in the absence of the facilitator) shall preside over meetings of the CAP."</i>
DPH-2	Complaint System	Request for third party audit of complaint system.	See Periodic Review discussion for Provision 22.310.060.G.

## Periodic Review Scoping Comments

Comment #	Issue Area	Brief Description	Response
DPH-3	Health and Safety Plan	Request for a Community Health and Safety Plan and access to such plan by the public. Information about the oil field should be available to the public.	<p>The facility has and Emergency Response Plan (ERP) as required by CSD Provision 22.310.050.A.3. The ERP is submitted to the following agencies: DOGGR, California Department of Fish and Wildlife Office of Spill Prevention and Response (OSPR), U.S. Environmental Protection Agency Region 9, California State Lands Commission Marine Facilities Division Planning Branch, and the U.S. Department of Transportation Office of Pipeline Safety. The ERP is not available to the public for security reasons consistent with County policy.</p> <p>Regarding data on the oil field, the CAP, community meetings, a newsletter, a web site, and a designated ombudsperson as required under CSD Provision 22.310.100.J provide multiple avenues for the public to access oil field information.</p> <p>Contact information for the oil field is available from all the information sources listed above and on the oil field fence and main gates. The Community Alert Notification (CAN) system, requirement under CSD Provision 22.310.050.A.1, provides an alert system for community notification.</p>
DPH-4	Emergency Response Plan	Request for an Emergency Response Plan and that it be made accessible to the public.	See response for DPH-3 above.

## Periodic Review Scoping Comments

Comment #	Issue Area	Brief Description	Response
DPH-5	CAN System	Request to enhance the CAN system.	<p>The comment that the CAN system only notifies residents that “opt in” to the system on issues at the oil field is not accurate. The commenter may be referring to the annual test of the CAN system whereby a select subset of the total notification list is used to test the system. The list for the CAN test includes all government safety and oversight agencies required and several members of the CAP and public that chose to be included. In the event of an actual emergency and use of the CAN system, the entire CAN list would be contacted automatically. The determination to activate the CAN system is not made by the oil field operator alone and requires the input from the applicable Fire Department and other public safety agencies. Regarding the referenced odor incident on November 22, 2018, the incident was reported and responded to by Cal-OES, DOGGR, and local CUPA/Fire Departments. None of these agencies required activation of the CAN system.</p>

## Periodic Review Scoping Comments

Comment #	Issue Area	Brief Description	Response
DPH-6	Monitoring	Request for fence line monitoring.	<p>The CSD requires a variety of monitoring programs including air quality/odor monitoring around the gas plant, storm water testing, groundwater monitoring, fugitive emissions inspections and ground movement surveys. In addition, the CSD provides for paleontological, noise, and vibration monitoring if determined to be necessary by County DRP or County DPH. Further, the Environmental Compliance Coordinator performs inspections of the oil field, which includes spot air monitoring and is available to respond as necessary to events or issues at the oil field.</p> <p>Regarding air quality monitoring, the STI Air Quality study, completed in December 2014, provided a site-specific air quality monitoring program for air toxics utilizing four monitoring locations. Each monitoring station included both air quality and meteorological instrumentation. Results of the study were consistent with the air quality impact analysis in the Baldwin Hills CSD EIR and the studies completed by the SCAQMD in the MATES programs. The County is looking forward to the forthcoming CARB SNAPS monitoring effort scheduled to begin in late 2019. The County will review the results of the SNAPS monitoring effort to determine the applicability of additional air quality monitoring at the oil field.</p>



## Periodic Review Scoping Comments

Comment #	Issue Area	Brief Description	Response
DPH-7	Information	Request the CSD include a provision for submitting data to the DPH.	<p>The CSD includes provisions for submittal of certain information, monitoring data, and reports to applicable agencies such as the SCAQMD, DOGGR, and DPW. Most of this data is available on either the oil field website or the DRP Baldwin Hills website. It is not clear from the comment what “operations data” the DPH is requesting; operations data is available in the <i>Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan</i> which is submitted on an annual basis and available on the web sites.</p> <p>DPH may request additional data from other agencies or the operator, however, the regulatory requirements of other governmental agencies is beyond the scope of the CSD and the Periodic Review.</p>

## Periodic Review Scoping Comments

Comment #	Issue Area	Brief Description	Response
DPH-8	Risk Assessment	Request for a risk assessment matrix.	<p>A health risk assessment was completed as part of the Baldwin Hills CSD EIR (see Section 4.3, Public Health Risk). The setbacks for drilling required by CSD Provision 22.310.050.B.14 are based on the results of that risk assessment.</p> <p>The County has not received any complaints or issues from the existing setback distances for the IOF. No wells have been drilled at the IOF since June 2014. The County is assessing the setback issue as part of the update to the County oil code and results of that process can be reviewed regarding the CSD when that process is completed.</p> <p>The potential for fires and explosions was analyzed in the Baldwin Hills CSD EIR (see Section 4.1, Safety and Risk of Upset) and seven mitigation measures were developed. These mitigation measures are captured in CSD Provisions 22.310.050 C.1, C.2, C.3, C.4, and 22.310.120.L.</p> <p>Note that the studies referenced above included the emissions and other impacts of drilling and that no well has been drilled at the IOF since June 2014.</p>
DPH-9	City and County Ordinance Update	Request to apply updated oil code ordinances to the CSD.	<p>The CSD, under Provision 22.310.070.G Periodic Review, states: <i>Such reviews shall, among other things, consider whether additional provisions should be added, appended, or removed. One of the main goals of the Periodic Review shall be to evaluate if proven technological advances that would further reduce impacts of oil operations on neighboring land uses should be incorporated into the provisions of this section.</i> Therefore, additional provisions may be added if the Periodic Review analysis makes such a recommendation.</p>
CCSC-1	CSD and Settlement Agreement	CSD and Settlement Agreement should be integrated for compliance.	<p>The two referenced documents do not need to be integrated for compliance. All requirements of the Settlement Agreement are incorporated into the CSD by reference.</p>

## Periodic Review Scoping Comments

Comment #	Issue Area	Brief Description	Response
CCSC-2	Bonding Indemnification	Request that surface and sub-surface owners be included in the financial indemnification of the oil field.	The CSD provides for indemnification, insurance and performance security as listed in Provision 22.310.070. Financial issues between operators of the oil field and property/mineral rights owners is beyond the scope of the CSD and Periodic Review.
CCSC-3	Document Definitions	Request that the CSD document definitions be revised consistent with other agencies.	The Periodic Review is a process to determine if the provisions are adequately protecting the health, safety, and general welfare of the public. Revisions of definitions or a re-write of the CSD does not assist toward that goal and is therefore not a consideration of the Periodic Review. A table of acronyms is available on Page iv of the Periodic Review.
CCSC-4	Digital Data	Oil field data should be available in digital format.	The provisions of Section 22.310.100 include the CAP, community meetings, a newsletter, a web site, and a designated ombudsperson to provide information to the public. The oil field website and the DRP Baldwin Hills website provide a plethora of information electronically.
CCSC-5	Abandoned Wells	Recommendation to use historical aerial photographs to identify abandoned wells.	The abandoned wells at the IOF were analyzed in the Baldwin Hills CSD EIR (see Section 4.4 Geology). CSD Provision 22.310.050.FF provides for soil vapor testing in the areas of abandoned wells.
CCSC-6	Document Definitions Information Request	Request that the CSD document definitions be revised consistent with other agencies. Information request; rigs and derricks.	Please see response to CCSC-3. Information requests are outside the scope of the Periodic Review.
CCSC-7	Document Definitions Information Request	Request for CSD document language revisions. Information request; drilling.	Please see response to CCSC-3. Please note information requests are outside the scope of the Periodic Review.
CCSC-8	Document Definitions Information Request	Request for CSD document language revisions. Information request; ECC.	Please see response to CCSC-3. Information requests are outside the scope of the Periodic Review.

## Periodic Review Scoping Comments

Comment #	Issue Area	Brief Description	Response
CCSC-9	Document Definitions Information Request	Request for CSD document language revisions. Information request; EQAP.	Please see response to CCSC-3. Information requests are outside the scope of the Periodic Review. Compliance information is available in EQAP and SIMQAP audit documents, the Periodic Review, CAP minutes, and CAP meetings.
CCSC-10	Document Definitions	Request for CSD document language revisions.	Please see response to CCSC-3.
CCSC-11	Document Definitions	Request for CSD document language revisions.	Please see response to CCSC-3.
CCSC-12	SIMQAP	SIMQAP information.	See Periodic Review discussion for Provision CSD 22.310.060.C.
CCSC-13	SIMQAP	SIMQAP information.	See Periodic Review discussion for Provision CSD 22.310.060.C.
CCSC-14	Document Definitions SPCC	Request for CSD document language revisions. SPCC information.	See Periodic Review discussion for Provision CSD 22.310.050.Q.
CCSC-15	Document Definitions Information Request	Request for CSD document language revisions. Information request.	Please see response to CCSC-3. Information requested is outside the scope of the Periodic Review.
CCSC-16	Document Definitions Information Request	Request for CSD document language revisions. Information request; ERP.	Please see response to CCSC-3. Information requested is outside the scope of the Periodic Review.
CCSC-17	Information Request	Request for information on property and mineral rights owners.	Information requested is outside the scope of the Periodic Review.
CCSC-18	Document Definitions Information Request	Request for CSD document language revisions. Information request.	Please see response to CCSC-3. Information requested is outside the scope of the Periodic Review.
CCSC-19	Document Definitions Information Request	Request for CSD document language revisions. Information request.	Please see response to CCSC-3. Information requested is outside the scope of the Periodic Review.
CCSC-20	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-21	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.

## Periodic Review Scoping Comments

<b>Comment #</b>	<b>Issue Area</b>	<b>Brief Description</b>	<b>Response</b>
CCSC-22	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. DOGGR has maps of the delineation of the Oil Field for reference.
CCSC-23	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-24	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. DOGGR reviews and permits reinjection of water at the oil field.
CCSC-25	Information Request	Information request.	Information requests is outside the scope of the Periodic Review.
CCSC-26	Document Definitions	Request that the CSD document definitions be revised consistent with other agencies.	Please see response to CCSC-3.
CCSC-27	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Gas busters are used as part of drilling operations. Vapor recovery systems are included for all tanks. Please see Periodic Review discussion for Provision 22.310.050.CC.3 on vapor recovery requirements.
CCSC-28	Document Definitions	Request that the CSD document definitions be revised consistent with other agencies.	Please see response to CCSC-3.
CCSC-29	Document Definitions Information Request	Request for CSD document language revisions. Information request.	Please see response to CCSC-3. Definitions are included in the CSD. Information requested is outside the scope of the Periodic Review.
CCSC-30	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Please see Periodic Review discussion for Provision 22.310.050.CC.3 on vapor recovery requirements.
CCSC-31	Information Request	Information request; meteorological station.	Information requested is outside the scope of the Periodic Review.
CCSC-32	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Please see Periodic Review discussion for Provision 22.310.050.C.3, C.4 and the Retention Basin Survey for subject information.

## Periodic Review Scoping Comments

<b>Comment #</b>	<b>Issue Area</b>	<b>Brief Description</b>	<b>Response</b>
CCSC-33	CSD and Settlement Agreement	CSD and Settlement Agreement should be integrated for compliance.	The two referenced documents do not need to be integrated for compliance. All requirements of the Settlement Agreement are incorporated into the CSD by reference.
CCSC-34	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Please see Periodic Review discussion for Provision 22.310.050.D.4 and D.5 and the Ground Movement Monitoring Plan for subject information.
CCSC-35	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Please see Periodic Review discussion for Provision 22.310.050.D.1.
CCSC-36	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Note that the previous and current operators do not use sumps as documented in the previous Periodic Review and annual EQAP reports.
CCSC-37	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-38	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-39	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-40	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. The Groundwater Monitoring Plan is available on the oil field website.
CCSC-41	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Note the Hazardous Materials Business Plan program is administered by County Fire CUPA.

## Periodic Review Scoping Comments

<b>Comment #</b>	<b>Issue Area</b>	<b>Brief Description</b>	<b>Response</b>
CCSC-42	Information Request	Information request. CSD and Settlement Agreement.	Information requested is outside the scope of the Periodic Review. Note the annual drilling plans provide a historical summary of wells drilled and the plans are available on the oil field website.
CCSC-43	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. The two referenced documents do not need to be integrated for compliance. All requirements of the Settlement Agreement are incorporated into the CSD by reference.
CCSC-44	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Data on bottom hole locations and drilling sites are provided every year as part of the Annual Drilling Plan.
CCSC-45	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-46	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Data on bottom hole locations and drilling sites are provided every year as part of the Annual Drilling Plan.
CCSC-47	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-48	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-49	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.

## Periodic Review Scoping Comments

<b>Comment #</b>	<b>Issue Area</b>	<b>Brief Description</b>	<b>Response</b>
CCSC-50	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Note that no produced water is removed from the oil field and is re-injected after treatment consistent with DOGGR requirements.
CCSC-51	Document Definitions Information Request	Request for CSD document language revisions. Information request.	Please see response to CCSC-3. Information requested is outside the scope of the Periodic Review.
CCSC-52	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Note the annual drilling plans provide a historical summary of wells drilled and the plans are available on the oil field website.
CCSC-53	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-54	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-55	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-56	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-57	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-58	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-59	Sumps	Information request; sump closure plan.	Information requested is outside the scope of the Periodic Review. Note that the previous and current operators do not use sumps as documented in the previous Periodic Review and annual EQAP reports.
CCSC-60	Document Definitions Information Request	Request for CSD document language revisions. Information request.	Please see response to CCSC-3. Information requested is outside the scope of the Periodic Review.



## Periodic Review Scoping Comments

Comment #	Issue Area	Brief Description	Response
CCSC-61	Document Definitions Information Request	Request for CSD document language revisions. Information request.	Please see response to CCSC-3. Information requested is outside the scope of the Periodic Review.
CCSC-62	Throughput Review Trigger	Request for derivation of throughput review value of 630 barrels a day.	The derivation of the throughput review trigger in CSD Provision 22.310.050.II was discussed in the initial Periodic Review. See Periodic Review for CSD Provision 22.310.050.II.
CCSC-63	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Financial issues between operators of the oil field and property/mineral rights owners are beyond the scope of the CSD and Periodic Review.
CCSC-64	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-65	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Note all requirements of the Settlement Agreement are incorporated into the CSD by reference.
CCSC-66	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Note all requirements of the Settlement Agreement are incorporated into the CSD by reference.
CCSC-67	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Note all requirements of the Settlement Agreement are incorporated into the CSD by reference.
CCSC-68	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Note all requirements of the Settlement Agreement are incorporated into the CSD by reference.
CCSC-69	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Note all requirements of the Settlement Agreement are incorporated into the CSD by reference.
CCSC-70	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.

## Periodic Review Scoping Comments

<b>Comment #</b>	<b>Issue Area</b>	<b>Brief Description</b>	<b>Response</b>
CCSC-71	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-72	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-73	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-74	Information Request Periodic Review	Information on Periodic Review process and notices.	Information requested is outside the scope of the Periodic Review. Regarding the schedule and noticing of the Periodic Review and Periodic Review process, both are provided on the County DRP website and announced at the monthly CAP meetings.
CCSC-75	Information Request Periodic Review	Information on Periodic Review process.	The Director of Public Health has not required any of the referenced surveys to date.
CCSC-76	Information Request Periodic Review	Information on Periodic Review process.	The draft report will be available to the CAP and operator for comment and will include an appendix with all comments received.
CCSC-77	Document Definitions Information Request	Request for CSD document language revisions. Information request.	Please see response to CCSC-3. Information requests are outside the scope of the Periodic Review. The Periodic Review document will be available to the public.
CCSC-78	Information Request Periodic Review	Information on Periodic Review process.	The Director of Public Health has not required any of the referenced surveys to date. The Periodic Review will contain a discussion of any violations and all recommendations determined by the review analysis.
CCSC-79	Information Request Periodic Review	Information on Periodic Review process.	The Director of Public Health has not required any of the referenced surveys to date.
CCSC-80	Information Request Periodic Review	Information on Periodic Review process.	The draft report will be available to the CAP and operator for comment and will include an appendix with all comments received.
CCSC-81	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-82	Information Request Periodic Review	Information on Periodic Review process.	The initial Periodic Review, completed in 2015, is available on the County DRP website.

## Periodic Review Scoping Comments

<b>Comment #</b>	<b>Issue Area</b>	<b>Brief Description</b>	<b>Response</b>
CCSC-83	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Please see Annual Drilling Plan documents for the requested information.
CCSC-84	Definitions	Request for CSD document language revisions.	County in the CSD refers to the County of Los Angeles.
CCSC-85	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-86	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. The Unused or Abandoned Equipment Removal Plan is available on the oil field website.
CCSC-87	Information Request CAP	Information request.	Information requested is outside the scope of the Periodic Review. Guidelines for the CAP were created and approved by the CAP in June 2009 and is available on the County DRP Baldwin Hills website.
CCSC-88	Information Request Neighborhood Meetings	Information request.	Information requested is outside the scope of the Periodic Review. Notices for the annual meetings are posted on the County DRP Baldwin Hills website, the oil field website and announced at CAP meetings.
CCSC-89	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-90	Information Request Web Site	Information request.	Information requested is outside the scope of the Periodic Review. See Periodic Review discussion for Provision 22.310.100.B3 for a discussion on the oil field web site.
CCSC-91	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Please see Periodic Review discussion for Provision 22.310.050.C.3, C.4 and the Retention Basin Survey for subject information.

## Periodic Review Scoping Comments

<b>Comment #</b>	<b>Issue Area</b>	<b>Brief Description</b>	<b>Response</b>
CCSC-92	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Please see Periodic Review discussion for Provision 22.310.050.D.7 for subject information.
CCSC-93	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Please see Periodic Review discussion for Provision 22.310.050.D.4 and D.5 and the Ground Movement Monitoring Plan for subject information.
CCSC-94	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Please see Periodic Review discussion for Provision 22.310.050.D.4 and D.5 and the Ground Movement Monitoring Plan for subject information.
CCSC-95	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Please see Periodic Review discussion for Provision 22.310.050.S for subject information.
CCSC-96	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Please see Periodic Review discussion for Provision 22.310.050.CC for subject information.
CCSC-97	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.

## Periodic Review Scoping Comments

Comment #	Issue Area	Brief Description	Response
CCSC-98	Monitoring Public Notification	Request for drone monitoring and public notification of hazards.	<p>The CSD requires a variety of monitoring programs including air quality/odor monitoring around the gas plant, storm water testing, groundwater monitoring, fugitive emissions inspections and ground movement surveys. In addition, the CSD provides for paleontological, noise, and vibration monitoring if determined to be necessary by County DRP or County DPH. Further, the Environmental Compliance Coordinator performs inspections of the oil field and is available to respond as necessary to events or issues at the oil field.</p> <p>Regarding air quality monitoring, the STI Air Quality study, completed in December 2014, provided a site-specific air quality monitoring program for air toxics utilizing four monitoring locations. Each monitoring station included both air quality and meteorological instrumentation. Results of the study were consistent with the air quality impact analysis in the Baldwin Hills CSD EIR and the studies completed by the SCAQMD in the MATES programs. The County is looking forward to the forthcoming CARB SNAPS monitoring effort scheduled to begin in late 2019. The County will review the results of the SNAPS monitoring effort to determine the applicability of additional air quality monitoring at the oil field.</p>
CCSC-99	Subsurface Safety Valves	Request for subsurface safety valves.	Downhole operations are under the jurisdiction of DOGGR.
CCSC-100	DOGGR Regulations	Include DOGGR regulations.	Applicable DOGGR regulations are included in the CSD by reference.

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Appendix B

Settlement Agreement and Mutual Release, July 15, 2011

## SETTLEMENT AGREEMENT AND MUTUAL RELEASE

This Settlement Agreement and Mutual General Release (hereinafter "Agreement") is entered into as of July 15, 2011 by and between Community Health Councils, Inc., Natural Resources Defense Council, Mark Salkin, the City of Culver City ("City"), Citizens Coalition for a Safe Community and Concerned Citizens of South Central Los Angeles (hereinafter collectively "Petitioners"), the County of Los Angeles (hereinafter "County") and Plains Exploration & Production Company (hereinafter "PXP"). All parties may be referred to herein as Parties or Party.

### RECITALS

- A. This Agreement is entered into with respect to the following four consolidated cases (hereinafter collectively the "Consolidated Cases"), each of which was filed in the Superior Court of the State of California, County of Los Angeles:
- i. Lead case *Community Health Councils, Inc., Natural Resources Defense Council and Mark Salkin, petitioners, v. County of Los Angeles, respondents, and Plains Exploration and Production Company, et al., real parties in interest* (Case No. BS118018);
  - ii. *City of Culver City, petitioner and plaintiff, v. County of Los Angeles, Los Angeles County Board of Supervisors, respondents, and Plains Exploration and Production Company, et al., real parties in interest* (Case No. BS118023);
  - iii. *Concerned Citizens of South Central Los Angeles, petitioner, v. County of Los Angeles, respondents, and Plains Exploration and Production Company, et al., real parties in interest* (Case No. BS118039); and
  - iv. *Citizen's Coalition for a Safe Community, petitioner, v. County of Los Angeles, Board of Supervisors of the County of Los Angeles, respondents, and Plains Exploration and Production Company, et al., real parties in interest* (Case No. BS118056).
- B. On October 28, 2008, the County, by and through its Board of Supervisors (hereinafter "Board"), approved the Baldwin Hills Community Standards District ("CSD"), an amendment to its zoning code establishing development standards and operating procedures for oil and gas production operations for the unincorporated portion of the Inglewood oil field ("Oil Field") located in the Baldwin Hills Zoned District, which took effect on or about December 1, 2008 and remains in effect. The Board certified the Final Environmental Impact Report ("EIR") for the proposed CSD on October 21, 2008. PXP



had filed an application for establishment of the CSD pursuant to Title 22 of the Los Angeles County Code ("County Code").

- C. Petitioners filed the petitions for writs of mandate identified in paragraph A above under the California Environmental Quality Act ("CEQA") challenging, among other things, the adequacy of the EIR and the Board's approval of the CSD, naming the County or the County and the Board as Respondents and PXP as Real Party in Interest. Thereafter, certain property owners were named as Real Parties in Interest ("Landowners").
- D. The Parties desire to resolve certain matters, including any and all claims raised in the Consolidated Cases and/or arising out of, or related to, or connected with the matters referred to in paragraph B above, by way of compromise.
- E. This Agreement relates to all claims and disputes presented in the Consolidated Cases that may exist as of the date of this Agreement and any and all other claims and disputes that exist between, in any combination, the County, PXP, and Petitioners that concern or in any way relate to the Board's approval of the Baldwin Hills CSD and certifications of its EIR referred to in paragraph B above.

## TERMS OF SETTLEMENT

NOW, THEREFORE, in consideration of the facts recited above and the covenants, conditions, and promises contained herein, the Parties agree as follows:

1. *Slant Drilling.*
  - a. *Deep Zone Wells.* Pursuant to the CSD, PXP is required to develop and submit to the County an annual drilling, redrilling, well abandonment and well pad restoration plan (hereinafter "Annual Drilling Plan"). For any and each well that PXP proposes to drill where the Top Hole (as defined in paragraph 1.e below) is closer than 800 feet to a Sensitive Developed Area (as defined in paragraph 1.e below) and the Bottom Hole (as defined in Paragraph 1.e below) is located in any deep zone (presently identified as the Nodular Shale and Sentous zones and any other zones approximately 8,000 feet or deeper), as a supplement to its Annual Drilling Plan ("Deep Zone Supplement"), PXP will provide a study of the technical feasibility and commercial reasonability of Slant Drilling (as defined in paragraph 1.e below) each of the new deep zone wells in order to locate the Top Hole of any such well away from any Sensitive Developed Area in order to further mitigate potential impacts to such Areas. The Deep Zone Supplement will be reviewed by the County and County-retained expert or experts as part of the County's review of the Annual Drilling Plan. This study will provide a narrative to justify the proposed surface location and shall provide sufficient detail to allow the County to review the extent to which it may be technically feasible and commercially reasonable to locate the Top Hole away from Sensitive Developed Areas in order to further mitigate potential impacts to such Areas and still reach the targeted Bottom Hole location. PXP shall provide to the County any additional information as may be reasonably requested by the County or its expert which is necessary to complete its review. If such information is considered proprietary, the County and its expert will enter into a confidentiality agreement with PXP to protect such information. The narrative will be reviewed by the Director of Regional Planning prior to the approval of the Deep Zone Supplement. If approved by the Director, PXP will Slant Drill in order to locate the Top Hole away from Sensitive Developed Areas consistent with the narrative prepared by PXP that justifies the surface location.

- b. *Mid-Zone Wells.* For wells where the Top Hole is closer than 800 feet to a Sensitive Developed Area and the Bottom Hole is located in a mid-zone (approximately 3,500 to 7,999 feet deep, presently identified as the Rubel, Moynier, Bradna and City of Inglewood zones), PXP shall document such locations in a supplement to the Annual Drilling Plan ("Mid-Zone Supplement"). PXP shall use commercially reasonable efforts to locate new mid-zone wells and well pads away from Sensitive Developed Areas in order to further mitigate impacts to such Areas. The Mid-Zone Supplement shall explain why it is not technically feasible and commercially reasonable to locate the Top Hole away from Sensitive Developed Areas in order to further mitigate impacts to such Areas. The referenced mid-zone well pad assessment will be reviewed by County-retained experts and the County. PXP shall provide to the County any additional information as may be reasonably requested by the County or its expert which is necessary to complete its review. If such information is considered proprietary, the County and its expert will enter into a confidentiality agreement with PXP to protect such information. The County shall approve the mid-zone well locations as part of its review of the Mid-Zone Supplement if consistent with this paragraph.
- c. *Shallow Wells.* Drilling of wells where the Bottom Hole is less than approximately 3,500 feet deep (hereinafter "Shallow Wells") and above the zones identified in 1(b) as mid-zones, shall be located away from Developed Areas (as defined in the CSD) and shall be identified in the Annual Drilling Plan. Drilling of Shallow Wells may proceed pursuant to said drilling plan after the County approves the portion of the Annual Drilling Plan related to Shallow Wells as set forth in the CSD.
- d. *Supplement Review.* Upon receipt, the County shall promptly forward the Drilling Plan Supplements ("Supplements" defined to be a Deep Zone Supplement, a Mid-Zone Supplement, or both) filed by PXP to the Community Advisory Panel ("CAP") established pursuant to the CSD for its review and comment. The County will allow the CAP or CAP members two weeks from the date the County provided Supplements to the CAP to provide their written comments on the Supplement to the County. The County may review and approve the Annual Drilling Plan and related Supplements in phases consistent with the terms herein, but shall conduct its review of the Annual Drilling Plan and Mid-Zone Supplement within 45 calendar days after their submission to the County and either approve the Supplement or provide PXP with a list of deficiencies within that 45-day timeframe as set forth in the CSD. The Drilling Plan Supplements will only include the study referenced in 1(a) and other relevant or required information related to the location of proposed wells. The County

shall conduct its review of the Deep Zone Supplement within 45 calendar days after its submission and either approve the Supplement or provide PXP with a list of deficiencies within that 45-day timeframe after considering any timely CAP comments concerning the Deep Zone Supplement. The County will not delay its review of the Annual Drilling Plan or any supplements thereto. PXP may drill any wells approved under the Annual Drilling Plan regardless of the status of the County's review of the Supplements. Similarly, PXP may drill any wells approved under a Supplement regardless of the status of the Annual Drilling Plan review and approval. Changes to well pad locations that result from review of the Supplements will not require resubmittal of the Annual Plan or delay any drilling under the Annual Plan, beyond the time necessary to implement such changes.

- e. *Definitions.* "Top Hole" shall mean the surface location from which drilling is commenced. "Bottom Hole" shall mean the underground location at which drilling terminates. "Slant Drilling" shall mean non-vertical drilling, directional drilling, or drilling at a relatively significant angle. "Sensitive Developed Area" shall mean a lot or parcel that contains a single or multi-family residence, existing park, school or health care facility.
- f. *Environmental Consideration.* The County shall lessen or disapprove any otherwise required Slant Drilling if more remote drilling would result in more significant adverse environmental impacts on balance and the County shall consider any timely comments by the CAP assessing this balance.
- g. *Non-interference.* This paragraph 1 of the Agreement shall be construed in connection with the entire CSD. Except as expressly set forth above, this paragraph shall not be construed to interfere with PXP's business in the Oil Field.

2. *Noise.*

- a. The CSD currently provides that hourly, A-weighted equivalent noise levels associated with drilling, re-drilling and reworking wells shall not elevate baseline levels (which shall not include drilling, re-drilling or reworking operations) by more than five A-weighted decibels ("dBA") at the Oil Field boundary of any Developed Area. Instead of the referenced five dBA provision, PXP shall limit the night time (10 p.m. to 7 a.m.) noise levels at Developed Areas to no more than three dBA above a one-hour baseline average for the defined nighttime period, but at no time will PXP be required to maintain noise levels below the baseline nighttime noise levels. Furthermore, PXP and the County determined the baseline noise levels at four additional Oil Field boundary locations near Developed Areas,

selected by PXP and the County, in addition to the seven utilized in the EIR for a total of 11 locations. If PXP violates the above noise requirements, no new drilling or redrilling permits shall be issued by the County until PXP, in

consultation with the County, identifies the source of the noise and PXP takes steps necessary to assure compliance with the above-specified threshold.

- b. If drilling, redrilling or reworking operations elevate nighttime baseline noise levels by more than 10dBA for more than 15 minutes in any one hour as independently verified and determined by the County, PXP, in consultation with the County, shall identify the cause and source of the noise and take steps to avoid such extended periods of noise elevation in the future. This provision does not negate the CSD noise limits between 7 a.m. to 10 p.m.
3. *Number of Drill Rigs.* Notwithstanding the CSD's allowance for operation of a maximum of three drill rigs at any one time on the Oil Field, PXP shall limit to two the number of drill rigs in use at any one time.
  4. *Number of wells.* Notwithstanding the aggregate and annual well-drilling limits in the CSD, PXP shall comply with the following limits:
    - a. Notwithstanding Section 22.44.142.H of the CSD, no more than 500 new wells (inclusive of Bonus Wells and wells drilled since approval of CSD) shall be drilled pursuant to the CSD (hereinafter "Director's Review") through October 1, 2028, or during the remaining life of the CSD, whichever is later.
    - b. Until such time as PXP has drilled or redrilled 50 wells since the adoption of the CSD, or 24 months from the date of this Agreement, whichever is sooner ("Time Period One"), no more than 30 wells may be drilled or re-drilled in any calendar year pursuant to a Director's Review as set forth in the CSD (hereinafter Director's Review). At the end of Time Period One, and if the County determines, pursuant to its review of the CSD by the Director of Regional Planning, that the CSD has been effective in protecting the health, safety, and general welfare of the public, thereafter (the "Full Operational Period") no more than 35 wells may be drilled or re-drilled in the calendar year pursuant to Director's Review.
    - c. In Time Period One, for each well abandoned within 800 feet of any Developed Area (the "800-foot zone") by PXP since adoption of the CSD and in full compliance with the California Department of Conservation's Division of Oil, Gas

and Geothermal Resources ("DOGGR") standards for abandonment at the time of abandonment, PXP may drill two additional new wells outside of the 800-foot zone (hereinafter "Bonus Wells"), up to a maximum of 45 drilled and re-drilled wells (30 wells plus 15 Bonus Wells) in any calendar year within Time Period One pursuant to Director's Review and subject to review and approval in the Annual Drilling Plan. Subject to the annual and aggregate limits on number of wells, Bonus Wells earned by abandonment may be drilled at any time during the life of the CSD.

- d. In the Full Operational Period, for each well abandoned within the 800-foot zone, PXP may drill two additional new wells outside the 800-foot zone up to a maximum of 53 drilled and re-drilled wells (35 wells plus 18 Bonus Wells) in that year pursuant to Director's Review and subject to review and approval in the Annual Drilling Plan. Subject to the aggregate and annual limits on number of wells, Bonus Wells earned by abandonment may be drilled at any time during the life of the CSD.
- e. The Developed Area as used in the CSD with respect to the 400-foot buffer zone (Section 22.44.142.E.) shall remain unchanged (static or fixed) from what it was determined to be on the effective date of the CSD.

- 5. *Health Assessment and Environmental Justice Study.* The County shall complete a Community Health Assessment of the communities surrounding the Oil Field which shall include an Environmental Justice component by June 2012 and ensure additional assessments are completed every five to seven years throughout the life of the CSD. In future Community Health Assessments, the County Department of Public Health ("Public Health") shall review other agencies' reports regarding air quality, water quality and seismic data, where feasible, in its assessment. Public Health will analyze the information by socio-economic and demographic data to accommodate and reflect an Environmental Justice component. The Community Health Assessment shall include, but not be limited to, an analysis of cancer rates, mortality rates, birth outcomes and a survey of other pertinent health indicators. The County will consult with the CAP and the Health Working Group regarding the Community Health Assessment and consider reasonable comments by the CAP and the Health Working Group. Public Health will comply with all applicable state and federal requirements including Title VI of the Civil Rights Act of 1964 and corresponding regulations, and California Government Code Section 11135 and corresponding regulations.
- 6. *Clean Technology Assessment.* The CSD requires PXP to consider proven reasonable and feasible technological improvements which are capable of reducing the

environmental impacts of drilling and re-drilling. (County Code section 22.44.142.E.26.f) The CSD also requires that the Annual Drilling Plan include a discussion of the latest equipment and techniques that are proposed for use as part of its drilling and re-drilling program to reduce environmental impacts. (County Code section 22.44.142.E.26.c.ix) Pursuant thereto, PXP shall address in each Annual Drilling Plan the availability and feasibility of the use of natural gas-powered drill rigs or other technology capable of reducing environmental impacts, for the drilling of wells proposed in the Annual Drilling Plan (collectively "Clean Technology"). During the Periodic Review provided in 22.44.142 G.7, the County will evaluate such technology for brand new equipment that PXP intends to lease, acquire or otherwise use and require PXP to implement such technology to the extent the technology is feasible and available on a commercially reasonable basis.

7. *Electrical Distribution Study.* The County will propose to Southern California Edison ("SCE") and the Los Angeles Department of Water and Power ("DWP") that a study be conducted in cooperation with SCE, DWP, the County and PXP regarding opportunities to streamline and consolidate electrical lines distributed throughout the Oil Field and that SCE and DWP each fund one-fourth of the cost of such study. PXP will fund one-fourth of the cost of any such study. The County will fund one-fourth of the cost of any such study.
8. *Air Quality Monitoring.* Supplemental to the air monitoring required by the CSD, the County will develop and implement an air quality monitoring plan that takes into consideration review and comments from Petitioners, interested stakeholders and the public. Such air monitoring shall be designed to assess the risk of both acute and chronic exposure to air contaminants from Oil Field operations, and endeavor to determine and distinguish the source of emissions, to the extent feasible, using available and affordable monitoring technology. Such air monitoring may be performed by SCAQMD, or an independent qualified consultant selected by County, and shall be commenced within 12 months of the date of this Agreement. The protocol for the air monitoring plan shall be peer reviewed prior to commencement. The plan shall be completed, and a peer reviewed report issued, within 12 to 24 months after commencement. The County commits to spending up to \$250,000 of its own funds toward implementing the plan and shall use reasonable efforts to seek additional funding sources, if necessary, to implement the plan. PXP shall reasonably cooperate with SCAQMD, the County and/or the independent consultant regarding any and all air monitoring related to the Oil Field.
9. *Back-Up Flare.* The CSD (County Code section 22.44.142.L.5.b) allows PXP to maintain its existing gas plant flare as back-up equipment at the facility's gas plant after

a new flare is permitted and installed. PXP and the County agree that this provision of the CSD allows only one gas plant flare to be operated at one time at the Oil Field. PXP shall comply with said limitation of only one gas plant flare operating at one time at the Oil Field. PXP shall install and have operational the new flare within 180 days of receiving the SCAQMD permit or at such later date as approved by the Director of Regional Planning for good cause shown.

10. *Well Plugs.* DOGGR requires oil field operators to utilize a minimum 25-foot cement surface plug at the top of a well when abandoning any such well pursuant to Title 14 of the California Code of Regulations section 1723.5. To augment this requirement, for all wells abandoned at the Oil Field from the date of this Agreement, PXP shall utilize a total of 150-foot cement surface plug.
11. *Landscaping.* PXP agrees to prepare and implement a series of landscape plans ("Landscape Plans") that enhance the Mia Lehrer Landscape Improvements Concepts plan dated November 4, 2008 to include, but not be limited to, landscaping along or near the border of the Oil Field in consultation with the County and subject to the County's approval. PXP's Landscape Plans shall be forwarded to the CAP for review. PXP will use best efforts to complete installation of the first two phases of the Landscape Plans along La Brea, between Stocker and Slauson, and Ladera Crest, within nine (9) months of County's final approvals of each of those first two Landscaping Plans using best landscaping practices. PXP agrees that it will complete the entire landscaping required by the County-approved Landscape Plans within three years after approval by the County of the final phase.
12. *Clean-Up Plan.* The CSD requires PXP to decommission and remove facilities that have reached the end of their useful economic life (County Code section 22.44.142.E.21.a) and submit to the County for its approval an unused or abandoned equipment removal plan (County Code section 22.44.142.L.14). PXP has submitted such a plan in 2009 and shall periodically update the plan should additional equipment, not identified in PXP's original removal plan, become unused or abandoned. Equipment and materials not necessary to oil field operations as identified by the Director of Planning shall be promptly removed from view of Sensitive Developed Areas as addressed in the plan.
13. *Fracking Study.* PXP shall pay for an independent consultant to conduct a study of the feasibility and potential impacts (including impacts to groundwater and subsidence) of the types of fracturing operations PXP may conduct in the Oil Field. The study will also consider PXP's historic and current use of gravel packing. Such study will be completed within twelve (12) months of the date of this Agreement. Such study and all



the back-up information for such study shall be provided to a qualified peer reviewer selected by the County and PXP, who shall review the study, back-up materials, and conclusions for completeness and accuracy. PXP must provide the independent expert with all materials requested and reasonably necessary for an accurate and verifiable study. The peer reviewer will be provided with access to all the data and materials provided to the independent expert. The peer reviewer shall agree to keep all proprietary information confidential. If the peer reviewer determines that the study is materially inadequate, incomplete or inaccurate, it shall so advise PXP's consultant who will complete the study as reasonably recommended by the peer reviewer and provide the revised study to the peer reviewer within 90 days. Upon acceptance by the peer reviewer, the study and all supporting material, including comments by the peer reviewer, shall be forwarded to the County, DOGGR, the Regional Water Quality Control Board ("RWQCB"), CAP and Petitioners and be available to the public, with any proprietary information redacted.

14. *CSD Review Based On Reduced Production.* When production drops to three percent of the estimated peak production to date of 21,000 barrels of oil per day, the County will review the CSD to consider whether modifications or closure of the Oil Field is necessary or appropriate or at such earlier date as the County determines is appropriate.
15. *CSD Provisions.* The CSD and all of its standards and requirements remain in full force and effect except to the extent that PXP has agreed to be limited by stricter or more rigorous controls or standards as reflected in this Agreement. Nothing herein shall limit or abrogate the County's discretion in amending the CSD, or other action pursuant to the County's legislative or police powers, to impose more restrictive requirements. This Agreement neither establishes nor abrogates any vested rights to drill new wells in the Oil Field. The County will provide written guidance on the additional limits and controls regarding operation of the Oil Field which are required by this Agreement to County staff and departments responsible for implementing the CSD and enforcing the CSD, and any other personnel the County deems necessary. The County shall recirculate this written guidance on an annual basis.
16. *General Releases between Petitioners and County.* In consideration of the terms and provisions of this Agreement, the County and Petitioners on behalf of themselves and their respective predecessors, successors, heirs, assigns, owners, attorneys, affiliates, parent corporation(s), divisions, officers, directors, employees, agents, representatives, partners, servants, executors, administrators, shareholders, board, councils, commissions, department, members, and each of them, in any and all capacities, do hereby mutually relieve, release and forever discharge the others and their respective predecessors, successors, heirs, assigns, owners, attorneys, affiliates, parent

corporation(s), divisions, officers, directors, employees, agents, representatives, partners, servants, executors, administrators, shareholders, board, councils, commissions, departments, members, and each of them, in any and all capacities, of and from all claims, rights, debts, liabilities, demand, obligations, liens, promises, acts, agreements, costs and expenses (including, but not limited to, attorneys' fees, costs and interest), damages, actions and cause of action, of whatever kind or nature (including without limitation, any statutory, civil or administrative claim, or any claim, arising out of acts or omissions occurring before the execution of this agreement), whether now known or unknown, suspected or unsuspected, fixed or contingent, apparent or concealed, relating to the Board's certification of the EIR and approval of the CSD; PROVIDED, HOWEVER, that this mutual release is not intended to and shall not constitute a release of the Parties' rights, obligations or warranties under this Agreement nor the rights and obligations of the County under the provisions of, or as set forth in, the CSD subject to the terms of paragraph 15. This release shall become final and take effect as to all Parties at the time upon which dismissals are to be filed pursuant to paragraph 28. Nothing herein shall release any claim for personal injury property damage or other claims, including any claim for nuisance, arising out of or related to acts or omissions in the operation of the Oil Field. Nothing herein shall release any claim or limit any right to challenge any future approval or action by the County, or other agency, relating to the CSD or the Oil Field.

17. *General Releases between Petitioners and PXP.* In consideration of the terms and provisions of this Agreement, PXP and Petitioners on behalf of themselves and their respective predecessors, successors, heirs, assigns, owners, attorneys, affiliates, parent corporation(s), divisions, officers, directors, employees, agents, representatives, partners, servants, executors, administrators, shareholders, board, councils, commissions, department, members, and each of them, in any and all capacities, do hereby mutually relieve, release and forever discharge the others and their respective predecessors, successors, heirs, assigns, owners, attorneys, affiliates, parent corporation(s), divisions, officers, directors, employees, agents, representatives, partners, servants, executors, administrators, shareholders, board, councils, commissions, departments, members, and each of them, in any and all capacities, of and from all claims, rights, debts, liabilities, demand, obligations, liens, promises, acts, agreements, costs and expenses (including, but not limited to, attorneys' fees, costs and interest), damages, actions and cause of action, of whatever kind or nature (including without limitation, any statutory, civil or administrative claim, or any claim, arising out of acts or omissions occurring before the execution of this agreement), whether now known or unknown, suspected or unsuspected, fixed or contingent, apparent or concealed, relating to the Board's certification of the EIR and approval of the CSD; PROVIDED, HOWEVER, that this mutual release is not intended to and shall not

constitute a release of the Parties' rights, obligations or warranties under this Agreement nor the rights and obligations of PXP under the provisions of, or as set forth in, the CSD subject to the terms of paragraph 15. Notwithstanding anything herein to the contrary, no person or entity that has or acquires an interest in the Oil Field, but contends or is adjudicated to not be bound by this Agreement, notwithstanding the intent of the Parties that such persons or entities are so bound, shall not be entitled to the benefits of the releases herein. This release shall become final and take effect as to all Parties at the time upon which dismissals are to be filed pursuant to paragraph 28. Nothing herein shall release any claim for personal injury, property damage or other claims, including any claim for nuisance, arising out of or related to acts or omissions in the operation of the Oil Field. Nothing herein shall release any claim or limit any right to challenge any future approval or action by the County, or other agency, relating to the CSD or the Oil Field. Nothing in this Agreement shall affect the City's rights, police powers or authority to regulate that portion of the Inglewood oil field within Culver City, nor shall this Agreement affect PXP's rights and operations, of that portion of the Inglewood oil field within Culver City.

18. *Settlement of Claims for Attorneys' Fees and Costs.* In settlement of each of Petitioners' claims for attorneys fees and costs, PXP shall pay \$1,250,000 and County shall pay \$350,000 ("Payments"). Before the time provided in Paragraph 28 below for dismissal of the Consolidated Cases expires, Petitioners may elect to provide written notice to PXP and County that it intends to dismiss the Consolidated Cases and, if so, shall provide counsel for PXP executed requests for dismissal of the Consolidated Cases ("Requests"). PXP and County will make their respective Payments to the Greenberg Glusker Fields Claman and Machtinger LLP Client Trust Account by check or wire transfer (with instructions to be provided) within twenty (20) days after receipt of the notice and Requests unless that would result in payment sooner than 45 days after the County Board of Supervisors approves the settlement, in which case Payment will be delivered no later than the 45<sup>th</sup> day after Board approval. If the above-referenced notice is not provided, the Payments will be made at the expiration of the time provided in Paragraph 28 below with PXP and the County making their respective Payments to the Greenberg Glusker Fields Claman and Machtinger LLP Client Trust Account by check or wire transfer (with instructions to be provided) after the Requests have been delivered to counsel for PXP. In either case, counsel for PXP shall hold the Requests in trust until the Payments by PXP and County have been delivered to Greenberg Glusker Fields Claman and Machtinger and shall thereafter file the Requests with the Court.
19. *Parties Bound.* This Agreement shall inure to the benefit of and shall be binding upon the successors and assigns of the Parties to this Agreement, including any successors to

any rights of PXP to operate in the Oil Field, and each of them. This Agreement may be enforced by any Party to the Agreement.

20. *Integration.* The Agreement constitutes a single, integrated written contract expressing the entire agreement of the Parties relative to the subject matter hereof and, with the sole and exclusive exception of any contemporaneous or subsequent written agreement between the Parties hereto subscribed by them or their duly authorized officers or agents, all prior and contemporaneous discussions and negotiations have been and are merged and integrated into, and are superseded by, this Agreement. Thus, no covenants, agreements, representations, or warranties of any kind whatsoever, whether express or implied in law or fact, have been made by any Party, except as specifically set forth in this Agreement or any contemporaneous or subsequent written agreement between the Parties subscribed by them or their duly authorized officers or agents.
21. *Non-Assignment of Claims.* Each of the Parties represents and warrants that it has not assigned or transferred any portions of any claim or interest arising out of, related to, or connected with the matters referred to in paragraphs A, B and C of the Recitals in this Agreement to any other individual, firm, corporation or other entity and that no such individual, firm, corporation or other entity has any lien, claim or interest in any of such claims. Each Party shall indemnify each other Party, defend, and hold it harmless from and against any claims, rights, debts, liabilities, demands, obligations, liens, promises, acts, agreements, costs and expenses (including, without limitation, attorneys' fees and costs), damages, actions and causes of action, of whatever kind or nature (including, without limitation, any statutory, civil or administrative claim, or any claim, arising out of acts or omissions occurring before the execution of this Agreement) of whatever kind or nature, whether now known or unknown, suspected or unsuspected, fixed or contingent, apparent or concealed, arising out of, related to or connected with any such prior assignment or transfer, or any such purported assignment or transfer.
22. *Settlement of Disputed Claims.* The Parties explicitly acknowledge and covenant that this Agreement represents a settlement of disputed rights and claims and that, by entering into this Agreement, no Party hereto admits or acknowledges the existence of any liability or wrongdoing, all such liability being expressly denied. No provisions hereof, or of any related documents, shall be construed as any admission or concession of liability, or any wrongdoing or of any preexisting liability.
23. *Additional terms.* Each of the Parties represents, warrants and agrees as follows:
  - a. Each of the Parties has received prior independent legal advice from legal counsel of its choice with respect to the advisability of making the settlement provided for

herein and with respect to the advisability of executing this Agreement. Each Party's attorney has reviewed the Agreement at length, made any desired changes, and signed the Agreement to indicate the attorney approved the Agreement as to form.

- b. Except for statements expressly set forth in this Agreement, no Party has made any statement or representation to any other Party regarding a fact relied upon by the other Party in entering into this Agreement and no Party has relied upon any statement, representation, or promise of any other Party, or of any representative or attorney for any other Party, in executing this Agreement or in making the settlement provided for herein.
- c. Each of the Parties has read the Agreement carefully, knows and understands the contents thereof, and has made such investigation of the facts pertaining to the settlement and this Agreement and of all matters pertaining hereto as it deems necessary and desirable.
- d. The terms of the Agreement are contractual, not a mere recital, and are the result of negotiations between the Parties.
- e. Each of the Parties to the Agreement agrees that such Party will not take any action which would interfere with the performance of this Agreement by any of the other Parties or which would adversely affect the rights provided for herein.
- f. This Agreement is intended to be final and binding between the Parties and further intended to be effective as a full and final accord and satisfaction between them as to any issue or claim arising out of, related to, or connected with the matters referred to in paragraphs A, B and C of the Recitals in this Agreement. Each Party relies on the finality of this Agreement as a material factor inducing that Party's execution of this Agreement.
- g. The failure by any Party to insist on performance of any of the terms or conditions of this Agreement shall not void any of the terms or conditions hereto, or constitute a waiver or modification of any of the terms or conditions hereto, nor be construed as a waiver or relinquishment by such Party of the performance of any such terms or conditions.

24. *Modifications.* No modification, amendment or waiver of any of the provisions contained in this Agreement, or any future representation, promise or condition in connection with the subject matter of this Agreement, shall be binding upon any Party

unless made in writing and signed by such Party or by a duly authorized officer or agent of Party, and except, that the County, as required by law, retains the right to amend the CSD, so long as done pursuant to the requirements of law.

25. *Execution.* This Agreement may be executed and delivered in any number of counterparts or copies ("Counterparts") by the Parties. Signatures may be provided via telefacsimile or electronically in PDF format. When each Party has signed and delivered at least one counterpart to the other Parties, each counterpart shall be deemed an original and, taken together, shall constitute one and the same Agreement, which shall be binding and effective as to the Parties.
26. *Authority to Execute.* Each Party executing this Agreement further represents and warrants that each has the full right and authority to enter into and perform this Agreement on behalf of the Party for whom each has signed and the full right and authority to bind fully said party to the terms and obligations (including, without limitation, the representations and warranties set forth herein) of this Agreement. The execution and delivery of this Agreement and the performance of the Parties' obligations have been or will be duly authorized by all necessary actions on the part of each of the Parties. This Agreement constitutes the legal, valid and binding obligations on, and of, the Parties.
27. *Covenant Not to Sue.* Each Party covenants not to assert any claim, right or defense that the Agreement is illegal, invalid, void or unenforceable and irrevocably waives any such claim, right or defense.
28. *Dismissal of Consolidated Cases.* Unless Petitioners elect to dismiss the Consolidated Cases sooner in accordance with Paragraph 18 above, within 180 days after execution of this Agreement by all Parties, Petitioners, and each of them, shall cause to be delivered to counsel for PXP the Requests; provided, however, that if a petition or other challenge to this Agreement has been timely filed, or is alleged to be, such Requests shall be delivered to counsel for PXP only if the petition or other challenge is unsuccessful and all avenues of appeal have been exhausted or the time has run to do so. PXP shall file the Requests after the Payments have been delivered as provided in Paragraph 18 above. After such time, the Parties shall take any other steps necessary to dismiss the Consolidated Cases. The Parties, through their counsel of record, shall sign the Stipulation and Proposed Order attached hereto as Exhibit B to be filed with the Court upon execution of this Agreement.
29. *Public Notice.* Following the execution of this Agreement, the Parties shall make an individual and/or joint public statement that shall include each of the elements of

Exhibit A. On an annual basis, the County shall schedule a public discussion at the CAP concerning this Agreement and the status of compliance with its terms. Additionally, the County shall post a copy of this Agreement on the County's Baldwin Hills Community Standards District webpage.

30. *Remedies for Breach.* The County will monitor and enforce PXP's compliance with the terms of the Agreement in the same manner and to the same extent as the County monitors and enforces the terms of the CSD.
  - a. The County shall not approve any Annual Drilling Plan nor any application for any new permits on the Oil Field, including any permit to drill or redrill any wells, if PXP is in violation of any of the material terms of paragraphs 1 – 4 and 11.
  - b. The terms of this Agreement may be enforced by bringing a breach of contract claim, or any other appropriate claim, in a court of competent jurisdiction.
  - c. Nothing herein shall be construed to limit any Parties' claims for damages or other relief, arising out of the breach of the terms of paragraphs 1 through 12 of this Agreement.
31. *Governing Law.* This Agreement shall be construed and enforced in accordance with the laws of the State of California where it is deemed to have been executed and delivered.
32. *Captions and Headings.* Captions and paragraph headings used herein are for convenience only. They are not a part of this Agreement and shall not be used in construing it.
33. *Survival.* Each and all of the covenants, representations and warranties of the Parties set forth in this Agreement shall survive the execution and delivery of this Agreement and the execution and delivery of any other document provided for herein.
34. *Good Faith Provision.* The Parties agree to cooperate fully, reasonably, and in good faith in the implementation of this Agreement. The Parties also agree to execute any and all supplemental documents, and to take all additional lawful and reasonable actions which may be necessary or appropriate to give full force and effect to the basic terms and to fully implement the goals and intent of this Agreement.

IN WITNESS WHEREOF, the Parties and their respective attorneys of record have approved and executed this Agreement on the dates specified below:

**RESPONDENTS**

COUNTY OF LOS ANGELES,  
CALIFORNIA

Date: July 14, 2011

By: Elaine M. Lemke (for)  
ELAINE M. LEMKE,  
Principal Deputy County Counsel  
Property Division

**PETITIONERS**

MARK SALKIN

Date: \_\_\_\_\_, 2011

\_\_\_\_\_  
MARK SALKIN, as an individual

COMMUNITY HEALTH COUNCILS, INC.

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

NATURAL RESOURCES DEFENSE  
COUNCIL

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

[SIGNATURES CONTINUED ON NEXT PAGE]



IN WITNESS WHEREOF, the Parties and their respective attorneys of record have approved and executed this Agreement on the dates specified below:

**RESPONDENTS**

**COUNTY OF LOS ANGELES,  
CALIFORNIA**

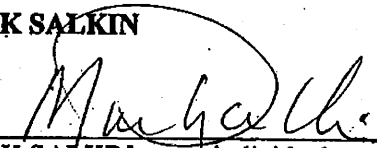
Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
ELAINE M. LEMKE,  
Principal Deputy County Counsel  
Property Division

**PETITIONERS**

**MARK SALKIN**

Date: July 14, 2011

  
\_\_\_\_\_  
MARK SALKIN, as an individual

**COMMUNITY HEALTH COUNCILS, INC.**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**NATURAL RESOURCES DEFENSE  
COUNCIL**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

[SIGNATURES CONTINUED ON NEXT PAGE]

IN WITNESS WHEREOF, the Parties and their respective attorneys of record have approved and executed this Agreement on the dates specified below:

**RESPONDENTS**

**COUNTY OF LOS ANGELES,  
CALIFORNIA**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
ELAINE M. LEMKE,  
Principal Deputy County Counsel  
Property Division

**PETITIONERS**


**MARK SALKIN**

Date: \_\_\_\_\_, 2011

\_\_\_\_\_  
MARK SALKIN, as an individual

**COMMUNITY HEALTH COUNCILS, INC.**

Date: 7/13/2011, 2011

By: 

**NATURAL RESOURCES DEFENSE  
COUNCIL**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

[SIGNATURES CONTINUED ON NEXT PAGE]

IN WITNESS WHEREOF, the Parties and their respective attorneys of record have approved and executed this Agreement on the dates specified below:

**RESPONDENTS**

**COUNTY OF LOS ANGELES,  
CALIFORNIA**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
**ELAINE M. LEMKE,**  
Principal Deputy County Counsel  
Property Division

**PETITIONERS**

**MARK SALKIN**

Date: \_\_\_\_\_, 2011

\_\_\_\_\_  
**MARK SALKIN, as an individual**

**COMMUNITY HEALTH COUNCILS, INC.**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**NATURAL RESOURCES DEFENSE  
COUNCIL**

Date: July 11, 2011

By: Janice K. Nayani

**[SIGNATURES CONTINUED ON NEXT PAGE]**

Date: \_\_\_\_\_, 2011

**CITY OF CULVER CITY**

By: Michael O'Leary  
MICHEÁL O'LEARY, Mayor

**CONCERNED CITIZENS OF SOUTH  
CENTRAL LOS ANGELES**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**CITIZEN'S COALITION FOR A SAFE  
COMMUNITY**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**REAL PARTY IN INTEREST**

**PLAINS EXPLORATION & PRODUCTION  
COMPANY**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**APPROVED AS TO FORM**

**COUNTY OF LOS ANGELES OFFICE OF  
THE COUNTY COUNSEL**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
ELAINE M. LEMKE  
Attorneys for Respondents COUNTY OF  
LOS ANGELES AND LOS ANGELES  
COUNTY BOARD OF SUPERVISORS

[SIGNATURES CONTINUED ON NEXT PAGE]

**CITY OF CULVER CITY**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**CONCERNED CITIZENS OF SOUTH  
CENTRAL LOS ANGELES**

Date: 7/12, 2011

By: [Handwritten Signature]

**CITIZEN'S COALITION FOR A SAFE  
COMMUNITY**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**REAL PARTY IN INTEREST**

**PLAINS EXPLORATION & PRODUCTION  
COMPANY**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**APPROVED AS TO FORM**

**COUNTY OF LOS ANGELES OFFICE OF  
THE COUNTY COUNSEL**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

ELAINE M. LEMKE  
Attorneys for Respondents COUNTY OF  
LOS ANGELES AND LOS ANGELES  
COUNTY BOARD OF SUPERVISORS

[SIGNATURES CONTINUED ON NEXT PAGE]

Date: \_\_\_\_\_, 2011

**CITY OF CULVER CITY**

By: \_\_\_\_\_

**CONCERNED CITIZENS OF SOUTH  
CENTRAL LOS ANGELES**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**CITIZEN'S COALITION FOR A SAFE  
COMMUNITY**

Date: July 12, 2011

By: Mered J. Glass

**REAL PARTY IN INTEREST**

**PLAINS EXPLORATION & PRODUCTION  
COMPANY**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**APPROVED AS TO FORM**

**COUNTY OF LOS ANGELES OFFICE OF  
THE COUNTY COUNSEL**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**ELAINE M. LEMKE**  
Attorneys for Respondents COUNTY OF  
LOS ANGELES AND LOS ANGELES  
COUNTY BOARD OF SUPERVISORS

[SIGNATURES CONTINUED ON NEXT PAGE]

**CITY OF CULVER CITY**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**CONCERNED CITIZENS OF SOUTH  
CENTRAL LOS ANGELES**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**CITIZEN'S COALITION FOR A SAFE  
COMMUNITY**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**REAL PARTY IN INTEREST**

**PLAINS EXPLORATION & PRODUCTION  
COMPANY**

Date: \_\_\_\_\_, 2011

By:   
DOSS R. BOURGEOIS, EXEC. VP E&P

**APPROVED AS TO FORM**

**COUNTY OF LOS ANGELES OFFICE OF  
THE COUNTY COUNSEL**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
ELAINE M. LEMKE  
Attorneys for Respondents COUNTY OF  
LOS ANGELES AND LOS ANGELES  
COUNTY BOARD OF SUPERVISORS

[SIGNATURES CONTINUED ON NEXT PAGE]

**CITY OF CULVER CITY**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**CONCERNED CITIZENS OF SOUTH  
CENTRAL LOS ANGELES**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**CITIZEN'S COALITION FOR A SAFE  
COMMUNITY**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**REAL PARTY IN INTEREST**

**PLAINS EXPLORATION & PRODUCTION  
COMPANY**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**APPROVED AS TO FORM**

**COUNTY OF LOS ANGELES OFFICE OF  
THE COUNTY COUNSEL**

Date: July 11, 2011

By: ELM for


ELAINE M. LEMKE  
Attorneys for Respondents COUNTY OF  
LOS ANGELES AND LOS ANGELES  
COUNTY BOARD OF SUPERVISORS

[SIGNATURES CONTINUED ON NEXT PAGE]



**HARDING LARMORE KUTCHER &  
KOZAL LLP**

Date: July 14, 2011

By:   
KENNETH L. KUTCHER  
Attorneys for Petitioners COMMUNITY  
HEALTH COUNCILS; NATURAL  
RESOURCES DEFENSE COUNCIL &  
MARK SALKIN

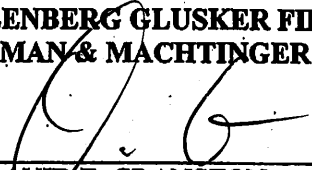
**NATURAL RESOURCES DEFENSE  
COUNCIL**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
DAMON NAGAMI  
Attorneys for Petitioners COMMUNITY  
HEALTH COUNCILS; NATURAL  
RESOURCES DEFENSE COUNCIL &  
MARK SALKIN

**GREENBERG GLUSKER FIELDS  
CLAMAN & MACHTINGER LLP**

Date: July 14, 2011

By:   
DAVID E. CRANSTON  
Attorney for Petitioner CITY OF CULVER  
CITY

[SIGNATURES CONTINUED ON NEXT PAGE]

**HARDING LARMORE KUTCHER &  
KOZAL LLP**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
**KENNETH L. KUTCHER**  
Attorneys for Petitioners **COMMUNITY  
HEALTH COUNCILS; NATURAL  
RESOURCES DEFENSE COUNCIL &  
MARK SALKIN**

**NATURAL RESOURCES DEFENSE  
COUNCIL**

Date: July 11, 2011

By: Damon K. Nagami  
**DAMON NAGAMI**  
Attorneys for Petitioners **COMMUNITY  
HEALTH COUNCILS; NATURAL  
RESOURCES DEFENSE COUNCIL &  
MARK SALKIN**

**GREENBERG GLUSKER FIELDS  
CLAMAN & MACHTINGER LLP**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
**DAVID E. CRANSTON**  
Attorney for Petitioner **CITY OF CULVER  
CITY**

[SIGNATURES CONTINUED ON NEXT PAGE]

Date: July 2, 2011

**THE CITY PROJECT**  
A 501(c)(3) Public Benefit Corporation

By: Robert Garcia  
ROBERT GARCIA  
Attorneys for Petitioners CONCERNED  
CITIZENS OF SOUTH CENTRAL LOS  
ANGELES

**LAW OFFICES OF TODD T. CARDIFF**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
TODD T. CARDIFF  
Attorneys for Petitioners CITIZENS  
COALITIONS FOR A SAFE  
COMMUNITY

**GIBSON DUNN & CRUTCHER LLP**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
JEFFREY D. DINTZER  
Attorneys for Real Parties in Interest  
PLAINS EXPLORATION AND  
PRODUCTION COMPANY

**THE CITY PROJECT**  
A 501(c)(3) Public Benefit Corporation

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
ROBERT GARCIA  
Attorneys for Petitioners CONCERNED  
CITIZENS OF SOUTH CENTRAL LOS  
ANGELES

**LAW OFFICES OF TODD T. CARDIFF**

Date: July 13, 2011

By: Todd T. Cardiff  
TODD T. CARDIFF  
Attorneys for Petitioners CITIZENS  
COALITIONS FOR A SAFE  
COMMUNITY

**GIBSON DUNN & CRUTCHER LLP**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
JEFFREY D. DINTZER  
Attorneys for Real Parties in Interest  
PLAINS EXPLORATION AND  
PRODUCTION COMPANY

**THE CITY PROJECT**  
A 501(c)(3) Public Benefit Corporation

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
ROBERT GARCIA  
Attorneys for Petitioners CONCERNED  
CITIZENS OF SOUTH CENTRAL LOS  
ANGELES

**LAW OFFICES OF TODD T. CARDIFF**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
TODD T. CARDIFF  
Attorneys for Petitioners CITIZENS  
COALITIONS FOR A SAFE  
COMMUNITY

**GIBSON DUNN & CRUTCHER LLP**

Date: July 14, 2011

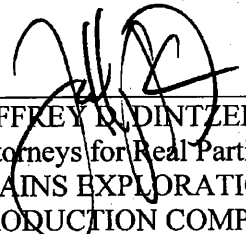
By: \_\_\_\_\_  
  
JEFFREY M. DINTLER  
Attorneys for Real Parties in Interest  
PLAINS EXPLORATION AND  
PRODUCTION COMPANY

EXHIBIT A - Public Statement - Paragraph 29 (Public Notice)

- i. The parties have negotiated in good faith a settlement containing important improvements to the Baldwin Hills Community Standards District ("CSD") that could not have been compelled by a court order resulting from the current litigation challenging the County's Environmental Impact Report and the CSD.
- ii. The terms of the settlement adequately augment the protections contained in the CSD and, when combined with the existing provisions of the CSD, provide a satisfactory framework for safeguarding community health, safety and security.
- iii. The settlement expedites the resolution of significant community concerns and allows the focus of this process to shift to constructive dialogue, implementation, monitoring and establishment of a more effective working relationship between the parties.

**EXHIBIT B**

1 CAROL A. SCHWAB (SBN 120183)  
City Attorney  
2 HEATHER S. BAKER (SBN 193058)  
Assistant City Attorney  
3 CITY OF CULVER CITY  
9770 Culver Blvd  
4 Culver City, California 90232  
Telephone: 310.253.5660  
5 Fax: 310.253.5664

6 DAVID E. CRANSTON (SBN 122558)  
DCranston@GreenbergGlusker.com  
7 GARRETT L. HANKEN (SBN 057213)  
GHanken@GreenbergGlusker.com  
8 SEDINA L. BANKS (SBN 229193)  
SBanks@GreenbergGlusker.com  
9 GREENBERG GLUSKER FIELDS CLAMAN &  
MACHTINGER LLP  
10 1900 Avenue of the Stars, 21st Floor  
Los Angeles, California 90067-4590  
11 Telephone: 310.553.3610  
12 Fax: 310.553.0687

13 Attorneys for Petitioner  
CITY OF CULVER CITY

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
15 COUNTY OF LOS ANGELES  
16

17 COMMUNITY HEALTH COUNCILS,  
18 INC. et al.

19 Petitioner,

20 v.

21 COUNTY OF LOS ANGELES, and DOES  
22 1 - 30, Inclusive,

23 Respondents,

24 PLAINS EXPLORATION AND  
25 PRODUCTION COMPANY, a Delaware  
corporation et al.,

26 Real Parties in Interest.

27 AND CONSOLIDATED CASES  
28

Lead Case No. BS118018  
(Consolidated with BS118023, BS118039,  
BS118056)

Assigned To: Hon. James C. Chalfant

**STIPULATION TO STAY ACTION AND  
[PROPOSED] ORDER**

Action filing dates: Nov. 25, Nov. 26 &  
Dec. 1, 2008

Trial date: July 15, 2011

**EXHIBIT B**

1           **IT IS HEREBY STIPULATED AND AGREED** by and among Petitioners, the City of  
2 Culver City, Community Health Councils, Inc., Natural Resources Defense Council, Mark Salkin,  
3 Concerned Citizens of South Central Los Angeles, and Citizens Coalitions for a Safe Community  
4 (collectively "Petitioners"), Respondent, County of Los Angeles ("County") and Real Party-in-  
5 Interest, Plains Exploration and Production Company ("PXP")(referred to herein collectively as  
6 the "Settling Parties"), through the undersigned, their respective counsel of record, in reference to  
7 the following facts:

8           WHEREAS, the following four consolidated cases (hereinafter collectively the  
9 "Consolidated Cases"), were each filed in the Superior Court of the State of California, County of  
10 Los Angeles:

- 11           a.     Lead case *Community Health Councils, Inc., Natural Resources Defense Council*  
12                 *and Mark Salkin, petitioners, v. County of Los Angeles, respondents, and Plains*  
13                 *Exploration and Production Company, et al., real parties in interest* (Case No.  
                    BS118018);
- 14           b.     *City of Culver City, petitioner and plaintiff, v. County of Los Angeles, Los Angeles*  
15                 *County Board of Supervisors, respondents, and Plains Exploration and*  
16                 *Production Company, et al., real parties in interest* (Case No. BS118023);
- 17           c.     *Concerned Citizens of South Central Los Angeles, petitioner, v. County of*  
18                 *Los Angeles, respondents, and Plains Exploration and Production Company, et*  
19                 *al., real parties in interest* (Case No. BS118039); and
- 20           d.     *Citizen's Coalition for a Safe Community, petitioner, v. County of Los Angeles,*  
21                 *Board of Supervisors of the County of Los Angeles, respondents, and Plains*  
22                 *Exploration and Production Company, et al., real parties in interest* (Case No.  
                    BS118056).

23           WHEREAS, the Settling Parties have been engaged in settlement negotiations of the  
24 Consolidated Cases and have reached a settlement of the Consolidated Cases, and have entered  
25 into a written settlement agreement (the "Settlement Agreement");

26  
27           WHEREAS, the Settling Parties believe that all necessary and appropriate approvals have  
28 been obtained and that the Settlement Agreement is procedurally proper, and enforceable; but to

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**EXHIBIT B**

1 preserve the Settling Parties' rights in the event a challenge is brought against the County's  
2 approval of the Settlement Agreement, the Settling Parties have agreed that the dismissal of the  
3 Consolidated Cases should not be filed until the time has run for any challenge to be asserted  
4 against the County's approval;

5  
6 WHEREAS, in consideration of the obligations and promises as set forth in the Settlement  
7 Agreement, Petitioners have agreed to file requests for dismissal of the Consolidated Cases and  
8 take any other necessary steps to dismiss the Consolidated Cases (the "Dismissal Request")  
9 within 180 days after execution of the Settlement Agreement by all Settling Parties, unless the  
10 County's approval of the Settlement Agreement is timely challenged, or alleged to be, in which  
11 case, Petitioners will file the Dismissal Request only if the challenge is unsuccessful and all  
12 avenues of appeal have been exhausted or the time has run to do so (collectively the "Challenge  
13 Period");

14  
15 WHEREAS, the Settling Parties desire a stay of the action until the Challenge Period has  
16 expired and thereafter dismissal of the Consolidated Cases are effected or, in the alternative, in  
17 the unlikely event that any challenge is brought and it succeeds in setting the County approval  
18 aside, voiding the Settlement Agreement or otherwise rendering it unenforceable, then the  
19 Settling Parties desire that the stay then be lifted and a trial date set;

20  
21 WHEREAS, the Settling Parties each consent to the proposed stay; and

22  
23 **IT IS THEREFORE HEREBY STIPULATED AND AGREED** by and between  
24 Petitioners, the County and PXP as follows:

- 25 1. The action before the Court shall be stayed in its entirety until the later of (1) 180  
26 days after execution of the Settlement Agreement, January \_\_\_\_, 2012 or (2) if  
27 the Settlement Agreement is timely challenged, or alleged to be, until the  
28 Challenge Period has expired.

**EXHIBIT B**

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- 2. Petitioners will file requests for dismissal of the Consolidated Cases and take any other necessary steps to dismiss the Consolidated Cases immediately following the end of the Challenge Period.
- 3. Alternatively, if the County's approval is set aside, the Settlement Agreement is determined to be unenforceable or void, and all avenues of appeal have been exhausted or waived, then Petitioners shall promptly give notice of same to the Court, the stay shall be lifted and will request that a trial date shall be set.

**IT IS SO STIPULATED.**

DATED: July \_\_, 2011

COUNTY OF LOS ANGELES

By: \_\_\_\_\_  
ELAINE M. LEMKE  
Attorneys for Respondent  
COUNTY OF LOS ANGELES

DATED: July \_\_, 2011

GIBSON DUNN & CRUTCHER LLP

By: \_\_\_\_\_  
JEFFREY D. DINTZER  
Attorneys for Real Parties in Interest  
PLAINS EXPLORATION AND  
PRODUCTION COMPANY, PLAINS  
RESOURCES, INC. AND THE LLOYD  
CORPORATION

DATED: July \_\_, 2011

GREENBERG GLUSKER FIELDS CLAMAN  
& MACHTINGER LLP

By: \_\_\_\_\_  
DAVID E. CRANSTON  
Attorneys for Petitioner CITY OF CULVER  
CITY

**EXHIBIT B**

1 DATED: July \_\_, 2011

HARDING LARMORE KUTCHER & KOZAL  
LLP

2

3

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By: \_\_\_\_\_

KENNETH L. KUTCHER  
Attorneys for Petitioners COMMUNITY  
HEALTH COUNCILS, INC., NATURAL  
RESOURCES DEFENSE COUNCIL &  
MARK SALKIN

5

6

7 DATED: July \_\_, 2011

NATURAL RESOURCES DEFENSE  
COUNCIL

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By: \_\_\_\_\_

DAMON NAGAMI  
Attorneys for Petitioners COMMUNITY  
HEALTH COUNCILS; NATURAL  
RESOURCES DEFENSE COUNCIL &  
MARK SALKIN

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15 DATED: July \_\_, 2011

LAW OFFICES OF TODD T. CARDIFF

16

17

By: \_\_\_\_\_

TODD T. CARDIFF  
Attorneys for Petitioner CITIZEN'S  
COALITION FOR A SAFE COMMUNITY

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19

20 DATED: July \_\_, 2011

THE CITY PROJECT

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22

By: \_\_\_\_\_

ROBERT GARCIA  
Attorneys for Petitioner CONCERNED  
CITIZENS OF SOUTH CENTRAL LOS  
ANGELES

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**ORDER**

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The Court having considered the foregoing Stipulation of the Settling Parties, and good  
cause appearing therefore,

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**EXHIBIT B**

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IT IS HEREBY ORDERED:

(1) All terms of the foregoing Stipulation are hereby adopted as an Order of this Court;

(2) The action before the Court shall be stayed in its entirety until the later of (1) 180 days after execution of the Settlement Agreement, January \_\_\_\_\_, 2012 or (2) if the Settlement Agreement is timely challenged, or alleged to be, until such time the challenge is determined to be unsuccessful and all avenues of appeal have been exhausted or the time has run to do so (collectively the "Challenge Period").

(3) Petitioners will either:

a. file requests for dismissal of the Consolidated Cases and take any other necessary steps to dismiss the Consolidated Cases immediately following the end of the Challenge Period; or,

b. if the Settlement Agreement is set aside, or determined to be unenforceable or void, and all avenues of appeal challenging such a decision have been exhausted or waived, then Petitioners shall promptly give notice of same to the Court, the stay shall be lifted and a trial date shall be set.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. JAMES C. CHALFANT  
JUDGE OF THE SUPERIOR COURT

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Appendix C  
Annual Well Increase Evaluation



Los Angeles County  
Department of Regional Planning



*Planning for the Challenges Ahead*

Richard J. Bruckner  
Director

December 12, 2011

Laura Vlk, Senior EH&S Specialist  
Plains Exploration & Production Company (PXP)  
5640 S. Fairfax Avenue  
Los Angeles, CA 90056

RE: Baldwin Hills Community Standards District (CSD)  
Request for Annual Well Increase in Accordance with the  
Settlement Agreement and Mutual Release Effective July 15, 2011

Dear Ms. Vlk:

Pursuant to the Baldwin Hills CSD Settlement Agreement and Mutual Release, on behalf of the Los Angeles County Department of Regional Planning, I am responding to your request dated October 10, 2011 to allow an increase of the number of wells that may be drilled or re-drilled annually in the unincorporated portion of the Baldwin Hills oil field. Paragraph 4.b of the subject Settlement Agreement entered into by the parties to the litigation challenging the County's approval of the CSD allowed for the increase of the number of wells annually drilled. In order to increase the number of wells allowed in a calendar year from 30 to 35, the Director of Regional Planning, after review, must determine that the CSD has been effective in protecting the health, safety, and general welfare of the public. As required by the Settlement Agreement, this review was conducted after Plains Exploration and Production Company ("PXP") had drilled the 50<sup>th</sup> well since the adoption of the CSD. Attached is the report documenting the County's findings. I concur with and adopt the findings and conclusions in that report.

Based on the attached report, we have concluded that the CSD has been effective in protecting the health, safety and general welfare of the public. Accordingly, PXP may drill or re-drill up to 35 wells per calendar year pursuant to a Director's Review for the individual oil wells. Thus, for the remainder of this year and future calendar years, PXP may drill up to 35 oil wells per calendar year, pursuant to a Director's review and so long as any wells to be drilled are identified in the current year's Annual Drilling Plan and so long as the drilling and activities associated with the drilling are otherwise consistent and in compliance with the provisions of the CSD.

If you have any additional questions, you may contact Rena Kambara or Pat Hachiya at (213) 974-6453.

Sincerely,



Richard J. Bruckner  
Director

Attachment

**PXP BALDWIN HILLS COMMUNITY STANDARDS DISTRICT (CSD)  
ANNUAL WELL INCREASE EVALUATION**

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Provision 4.b of the Settlement Agreement and Mutual General Release (“Settlement Agreement”) entered into July 15, 2011 states the following:

*“Until such time as PXP has drilled or redrilled 50 wells since the adoption of the CSD, or 24 months from the date of this Agreement, whichever is sooner (“Time Period One”), no more than 30 wells may be drilled or re-drilled in any calendar year pursuant to a Director’s Review as set forth in the CSD (hereinafter Director’s Review). At the end of Time Period One, and if the County determines, pursuant to its review of the CSD by the Director of Regional Planning, that the CSD has been effective in protecting the health, safety, and general welfare of the public, thereafter (the “Full Operational Period”) no more than 35 wells may be drilled or re-drilled in the calendar year pursuant to Director’s Review”.*

In October of 2011 PXP drilled the 50<sup>th</sup> well since the adoption of the CSD. On October 10, 2011 PXP submitted a request to Los Angeles County (“County”) Department of Regional Planning (“Regional Planning”) asking for the annual increase to 35 wells as allowed by provision 4.b of the Settlement Agreement.

In order for Regional Planning to approve the request to increase the number of annual wells to 35, the Director of Regional Planning (“Director”) must review the CSD and find that the CSD has been effective in protecting the health, safety, and general welfare of the public.

This document presents the result of the CSD review that was conducted to determine if the CSD has been effective in protecting the health, safety, and general welfare of the public. The review focused on the areas of the CSD that are related to health, safety and general welfare of the public. The relevant areas of the CSD included the following:

- Noise
- Vibration
- Air Emissions
- Odors
- Ground Movement
- Visual/ Aesthetics
- Safety and Risk of Upset
- Fire Protection/Emergency Response
- Ground Water Quality

For each of these areas a review was conducted of the relevant CSD provisions to determine if they have been effective in protecting the health, safety, and general welfare of the public. The remainder of this document presents the results of the review for each area. Based upon this



**PXP BALDWIN HILLS COMMUNITY STANDARDS DISTRICT (CSD)  
ANNUAL WELL INCREASE EVALUATION**

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review the CSD has been found to be effective thus far in protecting the health, safety, and general welfare of the public.

**A. Noise**

CSD Section 22.44.142.E.5 of Title 22 of the County Code addresses noise related impacts. Provision E.5.a covers noise limits for the oil field. These noise limits were established to ensure that the noise from the oil field would not represent a significant impact to the areas surrounding the oil field. Noise limits cover construction, general operations and drilling. PXP, The Los Angeles County Department of Public Health (“Public Health”), and the County’s Environmental Compliance Coordinator (MRS) have conducted extensive noise monitoring at the oil field and in the areas surrounding the oil field to determine if PXP has been in compliance with the noise limits specified in the provision E.5.a of the CSD.

As part of the 2010 Environmental Quality Assurance Program (EQAP) audit conducted by Regional Planning, Steve Rogers Acoustics (SRA) conducted a review of the noise monitoring performed to date by Behrens & Associates, Inc. during the drilling of selected new well. During this review SRA checked for apparent compliance with the drilling noise limits and noise monitoring requirements of the CSD. The report by SRA dated August 31, 2011 identified no noise exceedences resulting from drilling operations.

Noise monitoring conducted by MRS and Public Health showed that the oil field has been in compliance with the noise limits specified in provision E.5.a of the CSD.

As part of the 2010 EQAP audit, Regional Planning reviewed compliance with the quiet mode drilling plan (CSD provision E.5.c). The audit found that PXP was implementing all of the requirements of the plan, and that all of the required noise pads and boards were in place. As discussed above, a review of the noise monitoring data for drilling showed that the drilling operations were in compliance with the CSD noise limits. These results indicate that the quiet mode drilling plan is effective at limiting noise from drilling to levels below what would be considered detrimental to the health and welfare of the public.

Between January 2009 and the end of the third quarter of 2011, there were 22 noise complaints. PXP, in consultation with the County, investigated each complaint. Eleven of these complaints were determined not to be related to oil field operations, and were identified to be related to other noise sources. Four of the complaints were possibly related to oil field activities, and the remaining seven could not be identified or confirmed to have originated from the oil field. A review of noise monitoring data indicates that the four events possibly related to oil field operations did not exceed the noise limits specified in the CSD.

**PXP BALDWIN HILLS COMMUNITY STANDARDS DISTRICT (CSD)  
ANNUAL WELL INCREASE EVALUATION**

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Two of the noise complaints possibly related to oil field activities appeared to stem from operations at the pipe storage rack. PXP is in the process of relocating the pipe rack storage area from the southeast portion of the oil field, near the main office, to the center of the oil field, just east of the Vickers bioremediation farm. This new location is a greater distance from residential noise receptors. None of the noise complaints were found to be related to the drilling operations. As a result of the CSD requirements, PXP has actively addressed noise complaints related to oil field operations and made changes to operations to reduce the level of noise impacting surrounding areas using techniques such as installing additional sound walls around specific pieces of equipment.

Review of the PXP 2010 EQAP Compliance Report, the 2010 EQAP Audit Report prepared by the County, the noise monitoring data collected by PXP, Public Health, and the County's Environmental Compliance Coordinator, and the complaint log shows that the CSD has been effective at keeping noise to a level considered protective of the health and general welfare of the public.

**B. Vibration**

CSD Section 22.44.142.E.6 of Title 22 of the County Code addresses vibration related impacts. Provision E.6 requires vibration levels related to oil field operations not exceed a velocity of 0.25 mm/s over a frequency range of 1 to 100 Hz at any developed area. This vibration level was established by the County to be protective of health and welfare of the public. Vibration monitoring for drilling operations have shown that the drilling operations do not exceed the 0.25 mm/s level. Drilling vibration has been measured at a high of 0.1 mm/sec at a distance of 50 feet from the drill rig, which is well below the standard established in the CSD.

Between January 2009 and the end of the third quarter of 2011 there were five vibration complaints. Three of these complaints were determined to be related to operations at the gas plant flare. These three complaints occurred in 2009 and the first quarter of 2010. PXP made changes to the operations of the flare, as required by the CSD (provision L.5.b), to reduce the vibration caused by the flare. Since early February 2010, there have been no vibration complaints related to the operation of the flare.

PXP, in consultation with the County, investigated the two remaining complaints and determined they were likely unrelated to oil field operations. One of the complaints was a concern about drilling vibration, but at the time of the complaint the drill rig was not in operation.

Review of the PXP 2010 EQAP Compliance Report, the 2010 EQAP Audit Report prepared by the County, drilling vibration data, and the complaint log shows that the CSD has been effective

**PXP BALDWIN HILLS COMMUNITY STANDARDS DISTRICT (CSD)  
ANNUAL WELL INCREASE EVALUATION**

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at keeping vibration to a level considered protective of the health and general welfare of the public.

**C. Air Emissions**

CSD Section 22.44.142.E.2 of Title 22 of the County Code addresses air quality and public health related to air emission impacts. Provision E.2.d requires an Air Monitoring Plan to detect emissions of hydrocarbon and hydrogen sulfide that could impact the health and general welfare of the public. The monitoring plan covers the gas plant, drilling, and redrilling operations. The County reviewed the air monitoring data for 2010 through the end of the second quarter of 2011, and found no exceedences of the limits specified in the provision E.2.d of the CSD.

CSD provision E.2.e requires PXP to have a portable flare available for use during drilling, and to have the flare in operation when drilling through the Nodular Shale. PXP has had the portable flare connected, and in operation, for all wells drilled since the resumption of drilling in 2010. Review of the drilling records for 2010 through the second quarter of 2011 show that no gas has been directed to the flare as part of the drilling operations, and that the flare has been connected and in operation for all wells drilled, which is above and beyond the requirements of the CSD.

CSD provision E.2.f requires PXP to install a pressure monitoring system on all tanks that contain or could contain oil. This monitoring system is used to monitor the pressure in the vapor space of the tanks to ensure that hydrocarbon vapors are not released into the atmosphere due to over pressurization of the tanks. The County reviewed the pressure monitoring data for 2010 through the end of the second quarter of 2011, and found that there had been no pressure readings that would have indicated a vapor release from the tanks.

CSD provision E.2.l covers the installation of controls for air emission from off road construction equipment. PXP provided the County with California Air Resources Board (“CARB”) certifications for the off road construction equipment that demonstrates engine compliance with the Tier III standard. This ensures that the engines have an 80 percent or greater reduction in hydrocarbon emissions. PXP also provided the County with CARB certificates demonstrating that the off road construction engines are equipped with a Level 3 diesel catalyst. These level 3 catalysts reduce diesel particulate by at least 85 percent. The County Environmental Compliance Coordinator field-verified that applicable off road construction equipment engines matched the CARB certifications provided by PXP. The October 2008 Baldwin Hills Community Standard District Final EIR found that diesel particulate emissions were the largest contributor to health risk from oil operations.

CSD provision E.2.m covers the installation of controls for air emission from drill rigs. The County Environmental Compliance Coordinator verified that the drill rig used at the oil field is

**PXP BALDWIN HILLS COMMUNITY STANDARDS DISTRICT (CSD)  
ANNUAL WELL INCREASE EVALUATION**

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equipped with Tier II or better engines. PXP provided the County with source test data for the drill rig that demonstrates engine compliance with the CSD requirements. These requirements ensure that the engines have a 90 percent or greater reduction in hydrocarbon and diesel particulate matter emission smaller than 10 microns. The County Environmental Compliance Coordinator field-verified that drill rig engines have the heavy duty diesel catalysts installed for both hydrocarbon and particulate matter control. The Baldwin Hills EIR found that diesel particulate emissions were the largest contributor to health risk from oil operations.

CSD provision E.2.p requires PXP to implement a Fugitive Dust Control Plan. The PXP 2010 EQAP Compliance Report and the 2010 EQAP Audit Report prepared by the County showed that PXP has been implementing the requirements of the approved Fugitive Dust Control Plan. Review of the complaint log from 2009 through third quarter of 2011 show that there have been no dust complaints since the fourth quarter of 2009, which is about the time the Fugitive Dust Plan was fully implemented. In the fourth quarter of 2009 there were two dust complaints in the early evening of the same day. An Air Quality Management District (AQMD) inspector found that the wind had been blowing at 30 to 40 mph that day, and was likely generating dust from areas within the field. PXP had stopped all work at the site two hours prior to the first complaint. The following morning, PXP resumed watering of the roads within the oil field. With full implementation of the Fugitive Dust Control Plan, the issue of dust from the oil field appears to have been reduced to acceptable levels as reflected by the absence of dust complaints since the end of October 2009.

Provision E.32 of the CSD requires PXP to conduct annual soil gas testing in the vicinity of abandoned wells. This testing is required to determine if hydrocarbon vapors are being emitted from the ground in concentrations that could present a risk to public health. In 2010, a total of 96 locations were tested for soil gas hydrocarbons. Of the 96 locations, only six showed soil gas methane reading above 500 ppm. The highest reading was 2,468 ppm. As part of the soil gas testing study surface air testing was conducted at the twelve locations where soil gas levels were above 50 ppm. In all 12 tests, no methane in the surface air was detected. The South Coast Air Quality Management District (SCAQMD) Rule 1150.1 regulates methane emissions from soil. This rule limits surface air emissions of methane to less than 500 ppm. All of the surface air samples collected were below this level. The study found that there was no evidence of leaking wells, pipeline or natural seepage.

Review of the PXP 2010 EQAP Compliance Report, the 2010 EQAP Audit Report prepared by the County, air monitoring records, soil gas monitoring studies, equipment records, field verification, and the complaint log shows that the CSD has been effective at keeping air emissions to levels considered protective of the health and general welfare of the public.

**PXP BALDWIN HILLS COMMUNITY STANDARDS DISTRICT (CSD)  
ANNUAL WELL INCREASE EVALUATION**

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**D. Odors**

CSD Section 22.44.142.E.2 of Title 22 of the County Code addresses odors. Provision E.2.c requires PXP to implement an Odor Minimization Plan. This plan serves to reduce odors from the operation and requires a log of odor complaints and steps to be taken to reduce odors from the facility. As part of this plan, PXP is required to use odor suppressants for the bioremediation farms (CSD provision E.2.g) and for the drilling operations (CSD provision E.2.h). The County Environmental Compliance Coordinator has routinely verified that the odor suppressants are being regularly used at the bioremediation farms and for the drilling operations. Soil remediation activities at all three bioremediation farms have been ongoing since the CSD became effective and odor suppressants have been used during material loading and tilling of each farm.

Between January 2009 and the end of the third quarter of 2011 there have been 48 odor complaints. This represents over 50 percent of all of the complaints received since the adoption of the CSD. PXP, in consultation with the AQMD and the County, investigated each complaint. It is very difficult to pinpoint the source of an odor based upon a complaint because there typically is a delay between when the odor is reported and when an investigation can begin. In most instances, the odor is gone by the time an investigator arrives at the site of the complaint.

As part of the CSD requirements, PXP was required to install a meteorological station at the oil field (CSD provision E.2.j), which continuously monitors and records the wind direction and speed. In conducting odor complaint investigations, PXP and the County have used the meteorological station wind speed and direction to determine if the odor could have originated from the oil field. For any odor to have originated at the oil field, the wind would had to have been blowing from the oil field in the direction of the location of the complaint at the time the complaint was made.

Review of the odor complaints and associated meteorological data indicates that for 36 of the 48 complaints, it is unlikely the oil field was the source of the odor because the wind was not blowing in the correct direction at the time of the odor complaint. Three of the remaining odor complaints were determined to be skunks. For one of the remaining complaints, an AQMD inspector thought the odor could have been coming from a workover rig that was working on a well nearby the area of the complaint. The County determined that two of the odor complaints were likely due to an instrument air line breakdown. The source of the remaining six odor complaints could not be confirmed, but could have originated from the oil field.

The County also reviewed the air monitoring data at the time of each odor complaint, and found that there had been no unusual increase in the levels of hydrocarbons or hydrogen sulfide. This fact indicates that the level of odor was not high enough to represent a health risk to the public. Given that in over two and three-quarter years only one odor complaint was likely attributable to

**PXP BALDWIN HILLS COMMUNITY STANDARDS DISTRICT (CSD)  
ANNUAL WELL INCREASE EVALUATION**

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a workover rig operation, two attributable to a breakdown at the oil field, and an additional six could have been from the oil field but the source was never definitively identified, the County concludes that the CSD has been effective at keeping odors to levels considered protective of the health and general welfare of the public.

**E. Ground Movement**

CSD Section 22.44.142.E.4 of Title 22 of the County Code addresses ground movement. Provision E.4.e requires PXP to perform annual ground movement surveys to determine the extent of ground movement over the past year. If the ground movement has been equal to or greater than 0.6 inches at any given location in an upward or downward direction in the vicinity of or in the oil field, then PXP must conduct a study to review and analyze all claims or complaints of subsidence damage that have been submitted to the PXP or the County by the public or a public entity in the 12 months since the last ground movement survey. If this study determines that the ground movement was the result of oil operations, then DOGGR will evaluate the fluid injection and withdrawal rates at the oil field to determine whether adjustments to these rates may alleviate the ground movement, and if so, where in the oil field such adjustments should be made.

The first annual ground movement survey was conducted in 2011 and found that seven of the 42 monitoring stations in and around the oil field showed ground movement in excess of the 0.6 inches. Five of these locations were in the southeast area of the oil field including two in the Windsor Hills area. The other two were located in the north area of the oil field. One was just outside of the oil field near the corner of La Cienega Boulevard and Kenneth Hahn State Park. The final location is just northwest of the oil field in Culver City.

Based upon the survey results, the Los Angeles County Department of Public Works (“Public Works”) has requested that PXP conduct a study to determine if these ground movements are related to oil field operations and to review and analyze all claims or complaints of subsidence damage that have been submitted to PXP or the County by the public or a public entity in the 12 months since the last ground movement survey. Because this was the first ground movement survey, PXP will need to investigate all subsidence damage claims and complaints since the implementation of the CSD. To date there have been 12 complaints covering ground movement and structural damage.

The conclusion from the ground movement survey and Geotechnical Report was that there did not appear to be any trends in the land-based ground level survey, the satellite survey, and oil field activities over the 2010 reporting period from which correlations can be drawn relative to oil field activities resulting in ground movement. At this time, the data suggested that the recorded ground movement may be related to movement of the Newport-Inglewood fault zone.

**PXP BALDWIN HILLS COMMUNITY STANDARDS DISTRICT (CSD)  
ANNUAL WELL INCREASE EVALUATION**

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However, the final determination of whether oil field operations are causing ground movement sufficient to result in the reported structural damage will be based upon the study that is currently being conducted by PXP. If it is determined that the oil field operations have resulted in ground movement sufficient to cause structural damage, then as required by the CSD, DOGGR will evaluate the fluid injection and withdrawal rates at the oil field to determine whether adjustments to these rates may alleviate the ground movement, and if so, where in the oil field such adjustments should be made.

Review of the US Geological Survey's online earthquake database for the calendar year 2010 shows that only one earthquake, a magnitude 2.0, occurred within a two kilometer radius of the oil field. The USGS information indicates that the epicenter of that earthquake was located to the southwest of the limits of the oil field near Overland Street at a depth of approximately 12 km (7 miles) below oilfield activities. This would indicate that the oil field operations are not inducing seismic activity in the area.

As discussed above, the CSD provision covering ground movement has specific requirements of actions to be taken to alleviate ground movement causing structural damage if the ground movement is being caused by oil field operations. As such, the CSD provides a mechanism to ensure that ground movement is identified and maintained or mitigated to a level that is considered protective of the safety, health and general welfare of the public.

**F. Visual/ Aesthetics**

CSD Sections 22.44.142.E and L of Title 22 of the County Code addresses visual and aesthetic impacts. Provision E.10 requires PXP to install landscaping around the oil field based upon a Landscaping Plan approved by Regional Planning. PXP is currently in the process of installing landscaping along various portions of the perimeter of the field. As identified in the approved Landscaping Plan, the landscaping is being installed in phases. Once complete, the landscaping will improve the overall visual impacts and aesthetics of the area around the oil field.

Provision L.14 of the CSD requires PXP to prepare an Equipment Removal Plan, which identifies unused or abandoned equipment and materials to be removed from the oil field. To date, PXP identified and removed over 60 unused or abandoned pieces of equipment from the oil field, which reduced the amount of visible blight at the site. PXP continues to identify unused equipment and then remove the equipment from the oil field.

Provision E.14 of the CSD has required PXP to paint all oil operation related structures visible from public roadways and surrounding properties a dark color approved by Regional Planning. PXP has completed painting of the visible structures. The dark color has helped to blend the

**PXP BALDWIN HILLS COMMUNITY STANDARDS DISTRICT (CSD)  
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equipment into the background, thereby reducing the visual and aesthetic impacts of the oil field equipment.

Provision E.21.c requires PXP to remove and keep the oil field free of debris and vegetation overgrowth. As discussed above, PXP removed unused and abandoned equipment and conducted a vegetation clearing program to control the overgrowth of vegetation at the site. These activities have improved the overall visual and aesthetic appearance of the oil field.

As a result of the CSD, PXP has removed unused and abandoned equipment, painted the visible oil-related structures, removed debris and vegetation overgrowth, and is installing landscaping around portions of the oil field. All of these actions have improved the visual and aesthetic appearance of the oil field, which serves to enhance the general welfare of the public.

**G. Safety and Risk of Upset**

CSD Sections 22.44.142.E.3, 22.44.142.F, and 22.44.142.L.3 of Title 22 of the County Code addresses safety and risk of upset impacts. Provision E.3.b required the fire-proofing of all propane and natural gas liquid bullets (pressurized tanks used to store propane and natural gas liquids) and the use of an automatic deluge system. PXP fire-proofed these bullets and installed a deluge system. With this fire-proofing and deluge system, the potential for a propane or natural gas fire at the bullets has been substantially reduced.

Provision E.3.d required that PXP ensure that the secondary containment for oil tanks are capable of holding 110 percent of the capacity of the largest oil tank. This provision also required that the retention basins be capable of handling the 100-year storm event, and that all above ground pipelines be protected by basins for secondary containment to prevent spills from leaving the oil field. PXP conducted a number of studies to demonstrate that the proper secondary containment was in place and that the retention basins were adequately sized. The County Environmental Compliance Coordinator visually inspected the secondary containment, and Public Works reviewed and approved the retention basin capacities. All of these measures serve to assure that in the unlikely event of an oil or produced-water spill that the spilled material would be contained within the oil field and not impact areas outside of the oil field. Since implementation of the CSD, there have been no spills of oil or produced-water that have migrated or spilled offsite.

Provision E.29.e of the CSD required PXP to install tank bottom detection systems on all tanks at the oil field. PXP has these systems in place, which serve to detect any leaks from tank bottoms, thereby minimizing any potential spills by early detection of leaks.



**PXP BALDWIN HILLS COMMUNITY STANDARDS DISTRICT (CSD)  
ANNUAL WELL INCREASE EVALUATION**

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Between January 2010 and the end of the third quarter of 2011, there have been three reportable spills at the oil field that ranged in size from 30 barrels to 2.25 barrels. Two of the spills were oil and one was a mixture of oil and produced-water. All of these spills were contained within the oil field and were quickly cleaned up by PXP staff. There were no complaints that occurred during the period around these incidents.

Provision F.3 of the CSD required PXP to implement a Safety Inspection, Maintenance, and Quality Assurance Program ("SIMQAP"). This program, which is now in place, requires regular maintenance and safety inspections of oil field equipment. The program serves to improve overall safety and reliability of the oil field equipment, thereby reducing the likelihood of equipment failure that could lead to a release of hydrocarbons into the environment. The SIMQAP was reviewed as part of the 2010 EQAP audit conducted by the County.

Provision L.3.b of the CSD required PXP to conduct a gas plant safety audit. The audit identified approximately 20 corrective action items, all of which have been completed. Implementation of the corrective action items from the audit has improved the overall safety of the gas plant. The corrective action plan from the gas plant audit was reviewed as part of the 2010 EQAP audit conducted by the County.

Between January 2010 and the end of the third quarter of 2011, there have been only three reportable breakdowns at the oil field. One of the breakdowns was due to an electrical power loss that resulted from a hawk landing on one of Southern California Edison's transmission lines, which caused a short. This resulted in the 30 barrel spill of produced-water and oil as discussed above. The spill was contained with the secondary containment. The second breakdown was due to failure of a valve controller. The third breakdown was due to a failure of an instrument air line. These two breakdowns did not result in any spill of oil or produced-water, but did result in the release of approximately 7.5 pounds of hydrocarbon air emissions. In all cases, PXP took immediate steps to shutdown the facilities to minimize any releases. The County determined that two of the odor complaints were likely due to the instrument air line breakdown. There were no complaints associated with the other two breakdowns.

As a result of the CSD, PXP substantially reduced the likelihood of spills occurring at the facility, reduced the likelihood of spills traveling outside of the oil field, and improved the overall safety of the oil field operations. All of these actions reduce the likelihood of an event occurring at the oil field that could impact the public, and have increased the protection of the safety, health and general welfare of the public.

**PXP BALDWIN HILLS COMMUNITY STANDARDS DISTRICT (CSD)  
ANNUAL WELL INCREASE EVALUATION**

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**H. Fire Protection/Emergency Response**

CSD Sections 22.44.142.E.1 and 22.44.142.L.1 of Title 22 of the County Code addresses fire protection and emergency response. Provision E.1.a required PXP to install a community alert notification system (CAN) to allow for automatic notification of area residences and businesses in the event of an emergency arising at the oil field that could require residents or inhabitants to take shelter, evacuate, or take other protective actions. PXP installed the CAN system and tests the system on an annual basis. To date, the CAN system has not had to be activated.

Provision E.1.b of the CSD requires that PXP conduct spill containment response training on an annual basis, and that the sufficient oil spill containment and clean up equipment be maintained on site to handle the contents of the largest oil tank on the oil field. The 2010 EQAP audit conducted by the County verified that spill response training had been conducted in 2010, and that sufficient oil spill response equipment was on site to deal with the maximum spill size. The training received by employees helps to ensure that in the unlikely event of a spill it would be contained quickly and within the oil field.

Provision E.1.c of the CSD requires that PXP maintain and fully implement an emergency response plan. The 2010 EQAP audit conducted by the County verified that an updated emergency response plan was in place and was being fully implemented. This plan provides a number of spill prevention control and counter measure items that have reduced the likelihood of an oil spill, and ensured that in the unlikely event of a spill it would be contained quickly and within the oil field.

Provision L.1 of the CSD requires PXP to conduct a fire protection audit of the oil field's fire protection capabilities to evaluate compliance with NFPA requirements, the County fire code, the County Fire Department regulations, California Code of Regulations, and API requirements. PXP conducted the audit in consultation with County and Culver City Fire Departments. The results of the audit showed that the oil field was in compliance with all applicable fire protection regulations.

Between January 2010 and the end of the third quarter of 2011, there were eight small fires at the oil field that were quickly contained by PXP staff. Six of these fires were caused by electrical power line issues that sparked and started the fire. Two of these electrical fires were caused by small animals. One of the fires started outside of the oil field and moved onto the field. The County Fire Department determined that the last fire was attributed to a cigarette thrown out of car. PXP quickly responded to all of these fires and was able to extinguish the fires before they spread.

**PXP BALDWIN HILLS COMMUNITY STANDARDS DISTRICT (CSD)  
ANNUAL WELL INCREASE EVALUATION**

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As a result of the CSD, PXP substantially reduced the likelihood of spills and fires at the oil field, and improved the overall safety of the oil field operations. All of these actions reduce the likelihood of an event occurring at the oil field that could impact the public. These CSD provisions have also improved the ability of PXP to respond to and manage incidents at the oil field before they can impact the public. The CSD provisions for fire protection and emergency response have increased the protection of the safety, health and general welfare of the public.

**I. Ground Water Quality**

The CSD contains a provision that requires ground water monitoring to evaluate the impacts of oil operations on ground water quality. This monitoring is covered in Section 22.44.142.E.19 of Title 22 of the County Code, which requires quarterly ground water monitoring at the oil field. Ground water monitoring began in 2010, and all of the water samples have had hydrocarbon concentrations below the Maximum Contaminant Level (MCL) for drinking water. In 2011 levels of arsenic were found in one well that were above the MCL, but this is likely due to naturally occurring arsenic found in soil and rock.

The results of the ground water sampling program indicate that the CSD has been effective at controlling ground water contamination to levels that are considered protective of the health and general welfare of the public.

## Ferrel, Mimi

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**From:** Berlin, Greg <Greg.Berlin@alston.com>  
**Sent:** Thursday, June 17, 2021 11:40 AM  
**To:** Clerk, City; Public Comment at Culver City  
**Cc:** Carlsen, Nicki; Wickersham, Matt; Camacho, Dana  
**Subject:** Sentinel Peak Resources Comments on Proposed Ordinance (2 of 2)  
**Attachments:** September 2015 Final Periodic Review.pdf; 2011-2020 EQAP Audit Reports.pdf

Good afternoon,

On behalf of Sentinel Peak Resources, we are submitting additional attachments to our letter submitted in advance of the June 17, 2021 City Council Meeting regarding the proposed ordinance terminating nonconforming oil uses. This constitutes email two of two.

Please let me know if you have any issues opening or accessing these documents. Thanks very much.

**Greg Berlin | Senior Associate | ALSTON & BIRD**  
333 South Hope Street, 16th Floor | Los Angeles, CA 90071  
[Greg.Berlin@alston.com](mailto:Greg.Berlin@alston.com) | t: 213.576.1045 | c: 650.334.5939

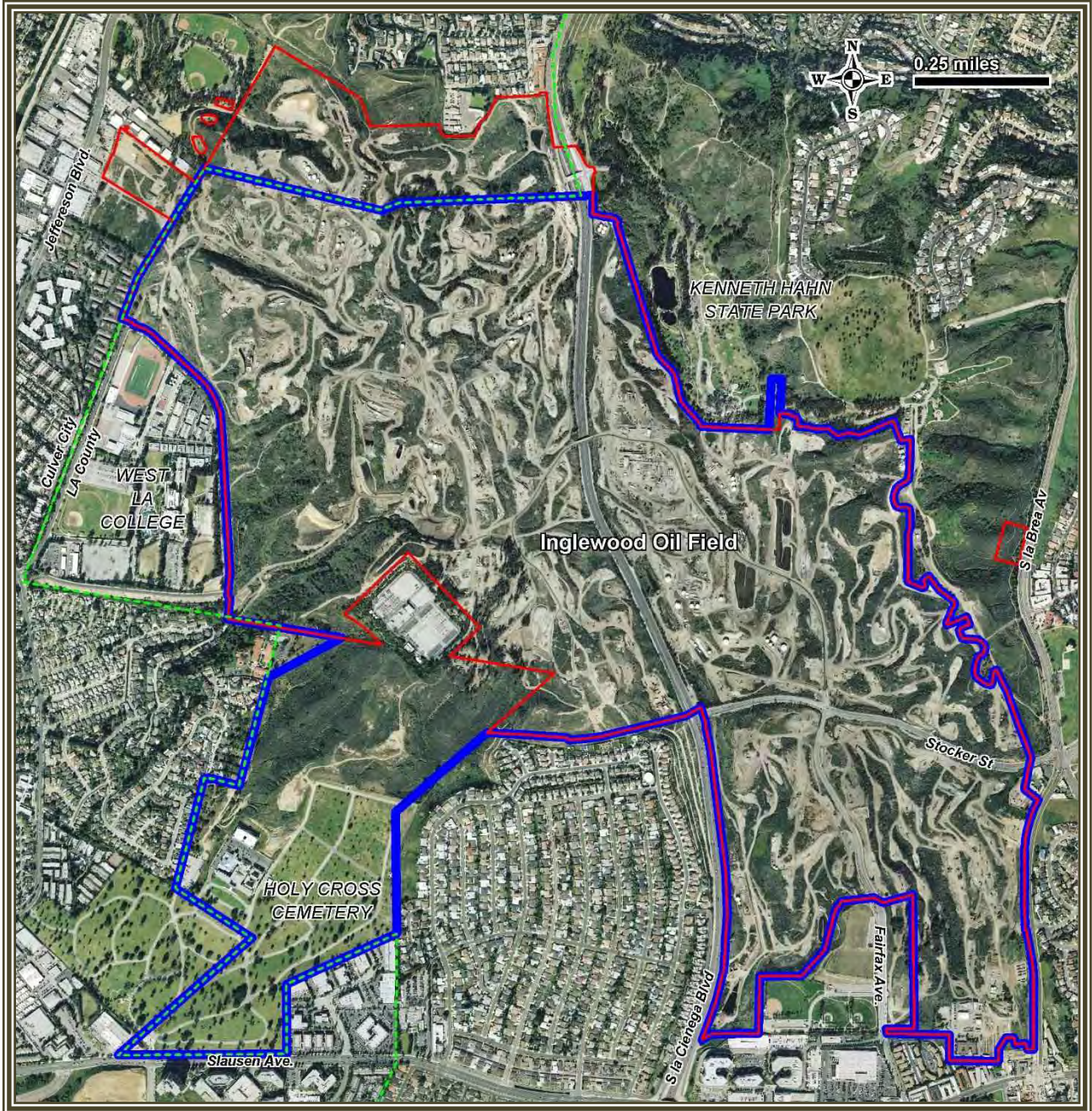
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# Baldwin Hills Community Standards District Periodic Review

Project Number: R2015-02225



## FINAL REPORT September 2015

Prepared By:  
**mrs**  
Marine Research Specialists

Prepared For:  
Los Angeles County  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012



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## ACRONYMS

AOR	Area of Review
API	American Petroleum Institute
AQMP	Air Quality Management Plan
ASTM	American Society for Testing and Materials
Bbl	barrels
BMP	Best Management Practices
Bpd	barrels per day
BTEX	Benzene, Toluene, Ethyl Benzene, and Xylenes
CAAQS	California Ambient Air Quality Standards
Caltrans	California Department of Transportation
CAN	Community Alert Notification
CAP	Community Advisory Panel
CAP	Clean Air Plan
CARB	California Air Resources Board
CCC	California Coastal Commission
CCFD	Culver City Fire Department
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulations
CGS	California Geological Survey
CHC	Community Health Councils
CNEL	Community Noise Equivalent Level
CPUC	California Public Utilities Commission
CSD	Community Standards District
CUP	Conditional Use Permit
CWPPP	Construction Storm Water Pollution Prevention Plan
dB	decibel
dBA	decibels, A-weighted
DOGGR	Division of Oil, Gas and Geothermal Resources
DOT	U.S. Department of Transportation
DPH	Department of Public Health
DPW	Department of Public Works
DRP	Department of Regional Planning
ECC	Environmental Compliance Coordinator
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
EQAP	Environmental Quality Assurance Program



## Baldwin Hills Community Standards District (CSD)

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ERP	Emergency Response Plan
ESA	Endangered Species Act
ESHA	Environmentally Sensitive Habitat Areas
FEIR	Final Environmental Impact Report
FM O&G	Freeport McMoran Oil and Gas
GHG	greenhouse gases
GIS	Geographic Information System
H <sub>2</sub> S	Hydrogen sulfide
HAZOP	Hazards and Operability
InSAR	Satellite aperture radar
LACoFD	Los Angeles County Fire Department
LADPW	Los Angeles County Department of Public Works
Leq	equivalent noise level
MACC	Multiple Agency Coordination Committee
MATES	Multiple Air Toxics Exposure Study
Mscfd	thousand standard cubic feet per day
MTBE	methyl tert butyl ether
NFPA	National Fire Protection Agency
NGL	natural gas liquid
NOP	Notice of Preparation
NOV	Notice of Violation
NO <sub>x</sub>	Oxides of Nitrogen
NPDES	National Pollution Discharge Elimination System
OPR	Office of Planning and Research
OSC	on-scene coordinator
OSCP	Oil Spill Contingency Plan
OSPR	Office of Spill Prevention and Response
PPM	part per million
QMDP	Quiet Mode Drilling Plan
RECLAIM	Regional Clean Air Incentives Market
RWQCB	Regional Water Quality Control Board
SCAQMD	South Coast Air Quality Management District
SIMQAP	Safety, Inspection, Maintenance, and Quality Assurance Program
SPCC	Spill Prevention, Control, and Countermeasures Plan
SWPPP	Stormwater Pollution Prevention Plan
THC	total hydro carbons
UIC	Underground Injection Control
VOC	volatile organic compounds

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## **Executive Summary**

The Baldwin Hills Inglewood Oil Field (Inglewood Oil Field), with the exception of the northern-most areas of the field which are within Culver City, is located in the unincorporated area of Los Angeles County. As such, the permitting and operations of the Inglewood Oil Field are under the jurisdiction, along with other local, State, and federal agencies, of the Los Angeles County Department of Regional Planning (DRP). The DRP performs all land use planning functions for the unincorporated areas of Los Angeles County including the County General Plan, community plans, ordinances, and Community Standard Districts (CSD). A CSD is a supplemental district used to address special issues that are unique to certain geographic areas within the unincorporated areas of Los Angeles County.

On October 28, 2008, the Los Angeles County Board of Supervisors adopted the Baldwin Hills Community Standards District (CSD). The CSD is an amendment to the Los Angeles County Zoning Code and establishes additional development standards and operating procedures for the oil and gas production operations at the Inglewood Oil Field. The CSD provides a means for implementing enhanced regulations to address the unique compatibility concerns associated with operating an oil field in the midst of urban development. In addition to the Los Angeles County Zoning Code and the Baldwin Hills CSD, operation of the Inglewood Oil Field is also subject to other local, State, and federal regulatory agencies including; County Public Works, County Fire Department, Culver City Fire Department, the South Coast Air Quality Management District, the California Department of Conservation, Division of Oil, Gas and Geothermal Resources, the California Regional Water Quality Control Board, and the California Department of Transportation.

Each provision, or permit condition, of the CSD addresses a specific potential environmental impact or administrative requirement associated with the continuing operation of the Inglewood Oil Field. Provision G.7, *Periodic Review*, requires the County to conduct a comprehensive review of the requirements of the CSD every 5 years to determine if the provisions are adequately protecting the health, safety, and general welfare of the public. This report, jointly prepared by the DRP and the consulting firm Marine Research Specialists, is the first analysis conducted pursuant to the Periodic Review requirement.

## **Periodic Review Results**

As detailed in the following pages of this report, the results of this Periodic Review document that the provisions of the CSD have been effective and adequate to protect the health, safety, and general welfare of the public. The report also determined that no recommendations to change the language of the CSD are necessary at this time. The report analysis did determine 11 areas where the implementation of a CSD provision could be improved. These recommendations are summarized in the following list, have been implemented, and are continuously monitored by the DRP via the Environmental

Quality Assurance Program and onsite inspections completed by the Environmental Compliance Coordinator.

- Include interested residents in the annual Community Alert Notification (CAN) system tests.
- Complete CSD required landscaping.
- Continue the use of waste bins and tanks as opposed to earthen sumps.
- Coordinate with the Regional Water Quality Control Board (RWCQB) on the potential installation of additional groundwater monitoring wells.
- Monitor and improve maintenance of perimeter fencing.
- Streamline Annual Drilling Plan graphics.
- Improve rig location scheduling to avoid concentrating rigs in one area.
- Complete a quality assurance safety inspection and maintenance audit.
- Encourage completion of annual unannounced Fire Department Safety Drills.
- Update and promote new participation in the Community Advisory Panel.
- Design the annual Community Meeting agenda and presentation to target issues associated with the Inglewood Oil Field.

Through the provisions of the CSD, and along with the oversight of local and State agencies, DRP staff will continue to monitor the operations at the Inglewood Oil Field to protect the health, safety, and general welfare of the public and the environment. More information on the Inglewood Oil Field is located on the DRP CSD and the Freeport McMoran (operator of the oil field) websites:

- <http://planning.lacounty.gov/baldwinhills>
- <http://www.inglewoodoilfield.com>

## 1.0 Introduction

On October 28, 2008, the Los Angeles County Board of Supervisors adopted the Baldwin Hills Community Standards District (CSD). The CSD is an amendment to the Los Angeles County Zoning Code and establishes additional development standards and operating procedures for the oil and gas production operations at the Inglewood Oil Field. Provision G.7, *Periodic Review*, requires the County to conduct a comprehensive review of the requirements of the CSD no later than five years after the effective date of the ordinance to determine if the provisions are adequately protecting the health, safety, and general welfare of the public. The Periodic Review process was initiated in mid-2013 and this March 2015 report is the first analysis conducted pursuant to the Periodic Review requirement of the CSD. This review covers the compliance period from the inception of the CSD through December 2013.

### 1.1 BALDWIN HILLS COMMUNITY STANDARD DISTRICT

The CSD established new development standards and operating procedures for the oil and gas production operations at the Inglewood Oil Field. The ordinance, number 2008-0057, amended Title 22 Planning and Zoning Code of the County of Los Angeles with the intent to implement regulations, safeguards, and controls for the oil and gas production activities of the Inglewood Oil Field. Further, the supplemental zoning regulations are intended to ensure that oil field operations are compatible with surrounding land uses, to minimize potential adverse impacts, and to enhance appearance of the site with landscaping and other property maintenance requirements. The boundaries of the CSD are shown on Figure 1.1.

The CSD ordinance is organized as follows:

- A. *Intent and Purpose*
- B. *District Boundaries*
- C. *Definitions*
- D. *Area Specific Development Standards*
  - 1. *Operational Limits*
- E. *Area Specific Development Standards and Operational Limits*
  - 1. *Fire Protection and Emergency Response*
  - 2. *Air Quality and Public Health*
  - 3. *Safety and Risk of Upset*
  - 4. *Geotechnical*
  - 5. *Noise Attenuation*
  - 6. *Vibration Reduction*
  - 7. *Biological Resources*
  - 8. *Cultural / Historical Resources*

9. *Lighting*
  10. *Landscaping, Visual Screening, Irrigation and Maintenance*
  11. *Oil Field Waste Removal*
  12. *Construction of Private Roads*
  13. *Signs*
  14. *Painting*
  15. *Sumps*
  16. *Well Cellars*
  17. *Stormwater Drainage Management*
  18. *Water Management Plan*
  19. *Groundwater Monitoring*
  20. *Fencing*
  21. *Oil Field Cleanup and Maintenance*
  22. *Security*
  23. *Vehicle Parking*
  24. *Sanitation*
  25. *Storage of Hazardous Materials*
  26. *Drilling, Redrilling, and Reworking Operations*
  27. *Processing Operations*
  28. *Well Reworking Operations*
  29. *Tanks*
  30. *Well Production and Reporting*
  31. *Idle Well Testing and Maintenance*
  32. *Abandoned Well Testing*
  33. *Well and Well Pad Abandonment*
  34. *County Request for Review of Well Status*
  35. *Reduced Throughput Triggering Review*
  36. *Abandonment Procedures*
- F. *Monitoring and Compliance*
1. *Environmental Quality Assurance Program (EQAP)*
  2. *Environmental Compliance Coordinator (ECC)*
  3. *Safety, Inspection, Maintenance and Quality Assurance Program (SIMQAP)*
  4. *Annual Emergency Response Drills of LA County and Culver City Fire Departments*
  5. *Noise Monitoring*
  6. *Vibration Monitoring*
  7. *Complaints*
- G. *Administrative Items*

1. *Costs of Implementing Monitoring and Enforcing Conditions*
  2. *Draw Down Account*
  3. *Indemnification*
  4. *Insurance Requirements*
  5. *Performance Security*
  6. *Other Obligations*
  7. *Periodic Review*
  8. *Multiple Agency Coordination Committee (MACC)*
  9. *Related County Code Provisions*
- H. *Permitting*
1. *Director's Review Required*
  2. *Conditional Use Permit (CUP) Required*
  3. *Conditional Use Permit (CUP) Requirements*
  4. *Insurance Requirements*
- I. *Indemnification*
1. *Civil Penalties and Performance Security*
  2. *Access to Records and Facilities*
  3. *Right of Entry*
- J. *Public Outreach*
1. *Community Advisory Panel (CAP)*
  2. *Community Relations*
  3. *Ombudsperson*
- K. *Modification of Development Standards*
- L. *Implementation Provisions*



Baldwin Hills Community Standards District (CSD)

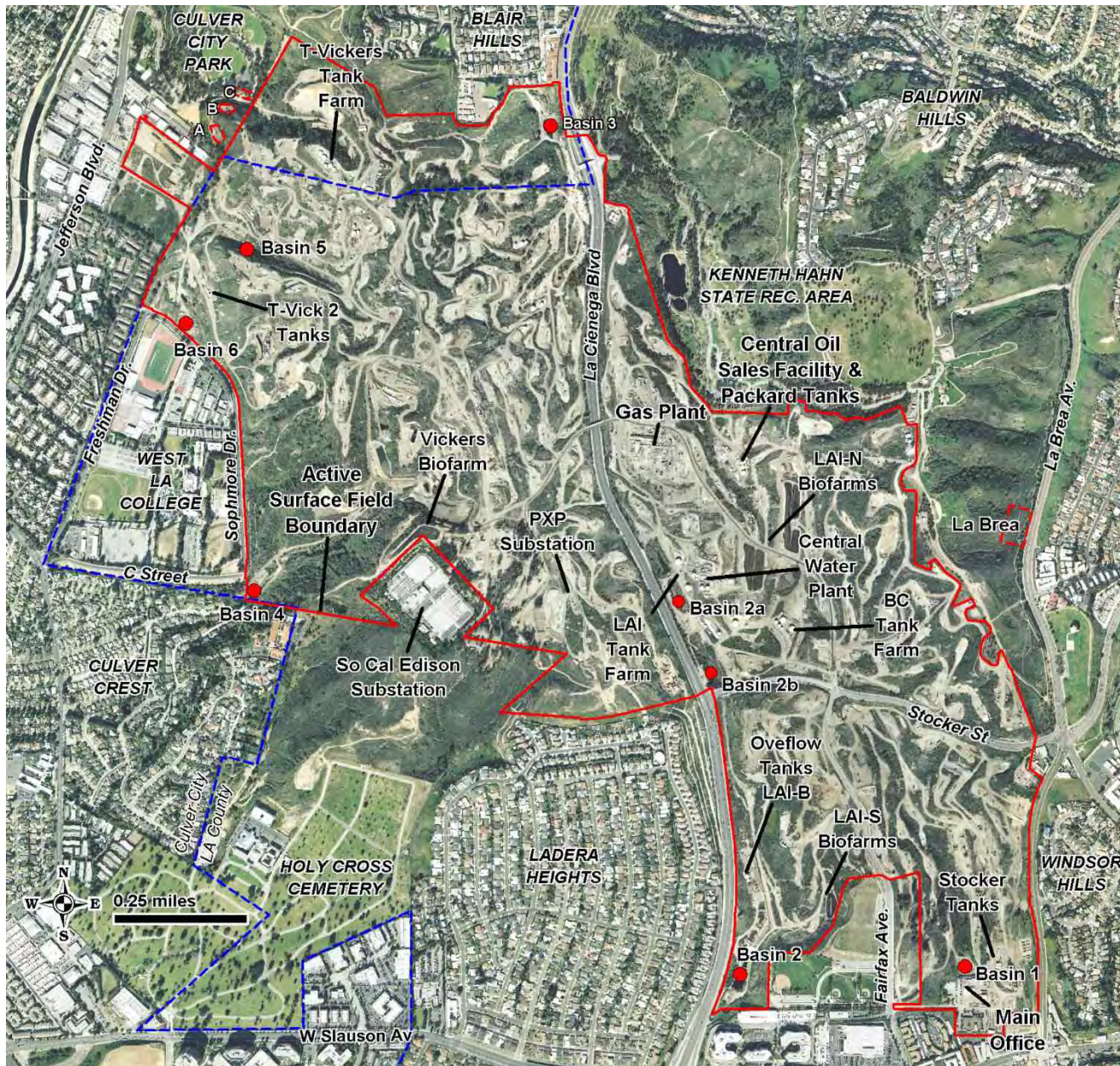


Figure 1.1  
Baldwin Hills  
Community Standards  
District (CSD)  
Boundary Map



## 1.2 CALIFORNIA DEPARTMENT OF CONSERVATION

The California Department of Conservation, Division of Oil, Gas and Geothermal Resources (DOGGR) oversees the drilling, operation, maintenance, and plugging and abandonment of oil, natural gas, and geothermal wells. DOGGR has jurisdictional authority to regulate all well downhole activities including well stimulation techniques. As such, the County, the CSD, and DOGGR work together to regulate and oversee the operations of the Inglewood Oil Field. The CSD provisions reference DOGGR regulations and authority where applicable.

## 1.3 CSD PERIODIC REVIEW (G.7) PROVISION

Provision G.7 of the CSD reads as follows:

***G.7 Periodic Review.*** *The county shall conduct a comprehensive review of the provisions of this section at least every five years to determine if the provisions of this section are adequately protecting the health, safety, and general welfare. Such reviews shall, among other things, consider whether additional provisions should be added, appended, or removed. One of the main goals of the Periodic Review shall be to evaluate if proven technological advances that would further reduce impacts of oil operations on neighboring land uses should be incorporated into the provisions of this section.*

*a. Review Requirements. Each review shall include a report by a hearing officer designated by the director, which shall be prepared after public notice and an opportunity for public comment. The report shall include a comprehensive analysis of the effectiveness of this section, and shall review and consider enforcement activity, operational records, and any other issues relating to oil operations. The report, at the option of the county, may include a survey of residents near the oil field regarding noise, odors, vibrations, and other issues requested by the director of public health. A draft of the report shall be provided to the CAP and the operator for review and comment. All comments on the draft report from the CAP and the operator shall be submitted to the hearing officer in writing, and will be considered, if timely received, before the report is finalized. The final report by the hearing officer shall include a recommendation as to whether the director should prepare proposed amendment to this section for submission to the board of supervisors.*

*b. Early Reviews. At the discretion of the director, reviews of this section may be conducted more frequently than every five years. Without limiting such discretion, the director shall consider whether an early review should be undertaken if more than three material violations occur within any 12-month period.*

*c. Initial Review. The initial review shall occur no sooner than three years and no later than five years after the effective date of the ordinance establishing this section unless the director determines that such initial annual review shall occur at an earlier time pursuant to subsection b, above.*

#### **1.4 ORIGIN OF THE PERIODIC REVIEW**

This review is the first comprehensive review of the CSD provisions as required by Provision G.7. As outlined in the provision above, the requirement identifies the timeline for the Periodic Review process as at least five years after the adoption of the CSD and at earlier intervals, if deemed necessary by the County. The CSD was adopted on October 28, 2008; taking effect on November 27, 2008; therefore, this review is on schedule to meet the initial five year Periodic Review requirement. There have been no significant non-compliance issues or accidents at the Inglewood Oil Field since the provisions of the CSD have been implemented through December 2013. In addition, the County continuously monitors compliance with the CSD through the Environmental Quality Assurance Program. The County has not required the initiation of a Periodic Review of the CSD prior to the five-year schedule requirement.

#### **1.5 PERIODIC REVIEW METHODOLOGY**

The Periodic Review process was initiated with a presentation by the County at the Community Advisory Panel (CAP) meeting on May 23, 2013. The CAP was established to foster communication between the community, the County, and the oil field operator (Freeport McMoran Oil & Gas or FM O&G) regarding oil field operations (see discussion for Provision J.1 for more detail on the CAP). The presentation provided an overview of the Periodic Review provision of the CSD and solicited public input on the effectiveness of the CSD for input to the Periodic Review. The County also solicited comments on the Periodic Review via an electronic survey posted on the County Department of Regional Planning (DRP) website. The County received comments on the Periodic Review at the May 23, 2013 and subsequent CAP meetings, in the responses to the electronic survey, and in separate comment letters and emails. All input was considered in the preparation of the Periodic Review public draft document.

The Periodic Review was then formally initiated in the fall of 2013 with a comprehensive analysis and review of the implementation and effectiveness of the CSD. The analysis reviewed a variety of compliance records and plans to determine the effectiveness of the CSD to protecting the health, safety, and general welfare of the public including:

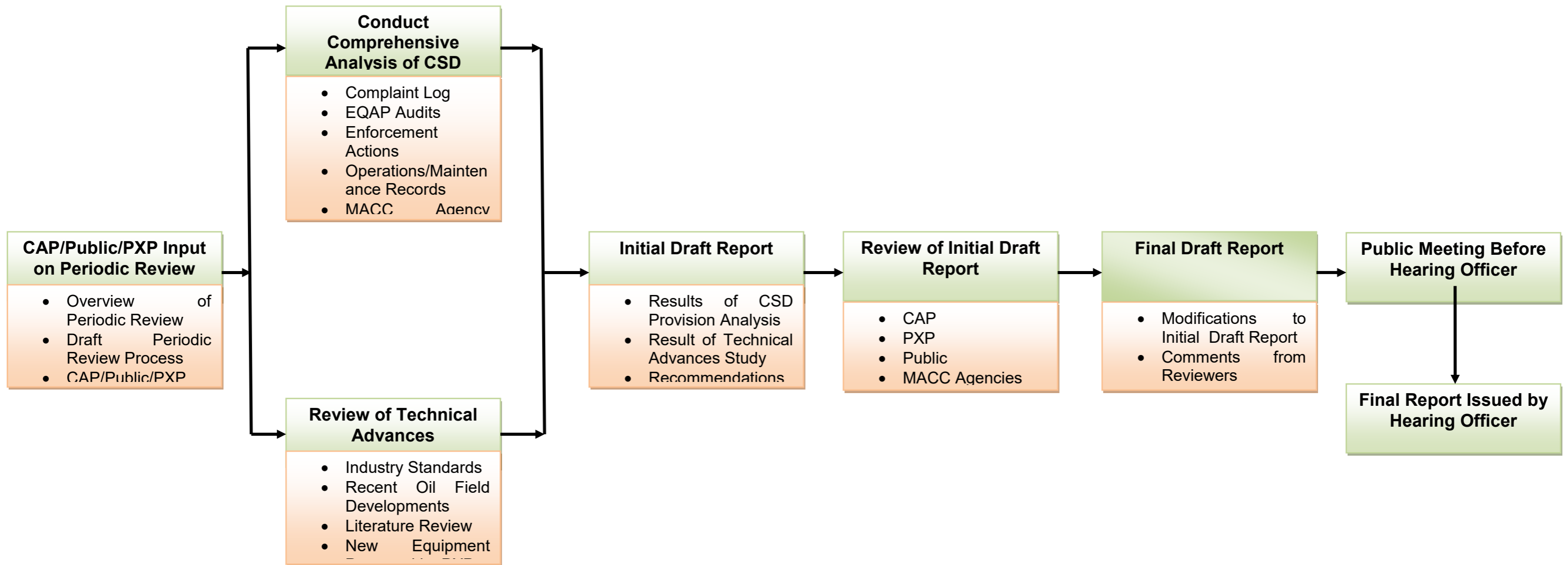
- Compliance plans
- Compliance records
- Operations and maintenance records
- Results of the Environmental Quality Assurance Program (EQAP)
- Multi Agency Coordination Committee (MACC) records
- Violations or enforcement actions

- CSD administrative requirements
- Regulatory permits activity
- Technological advancements in the operation of oil fields

The draft Periodic Review document was released and distributed to the CAP, MACC, the public and the oil field operator for review and comment in February 2014. The report was then finalized in March 2015 based on input received and is scheduled to be introduced formally at a public hearing before a County hearing officer in the late Spring/early Summer of 2015. Appendix A summarizes the comments and provides responses on the Public Draft document. Figure 1.2, Periodic Review Flowchart, presents a timeline of the steps taken in preparation of the Periodic Review document.

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**Figure 1.2  
Baldwin Hills CSD  
Periodic Review Flowchart**



*Stakeholder Input  
May-August 2013*

*Release Initial  
Draft Report  
February 2014*

*Public Comment Period  
60 Days from Release of Initial  
Draft Report*

*Public Meeting before  
Hearing Officer  
Summer 2015*

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## 1.6 PERIODIC REVIEW REPORT FORMAT

This report provides a review of the effectiveness and adequacy of the provisions of the CSD to protect the health, safety, and general welfare of the public. The analysis also determines compliance of the oil field with the operational limits, development standards, monitoring, administrative, and permitting requirements of the CSD. The review for the development standards contained in CSD subsections D, E, F, G, H, and J are organized as follows:

- Provision Language
- Summary of Complaints
- Summary of Issues Raised by the Public
- Analysis of Compliance and Effectiveness
- New Technology
- Recommendations to Changes in Implementation
- Recommendations to Changes in CSD Language

The Summary of Complaints section discusses whether complaints have been made by the public on the subject CSD provision through the complaint procedure pursuant to Provision F.7, *Complaints*. Input from the public outside of the complaint process is discussed in the Summary of Issues Raised by the Public section. This section provides an overview of input received by the County during Community Advisory Panel (CAP) meetings, from the results of the electronic review, email, and letter input solicited for comment on the Periodic Review, and from the public concerns that led to the additional requirements stipulated in the lawsuit settlement agreement dated July 15, 2011; a brief overview of the settlement agreement is included in Section 3.0.

The Analysis of Compliance and Effectiveness section provides detail on the implementation of the condition and a determination as to the whether the requirements have worked as intended. The applicability of potential new technologies that may improve and or lessen the environmental impact of oil field operations is noted in the New Technology section. Finally, recommendations to changes in the implementation or language of the provision are discussed in the last two sections of the review.

CSD subsections I, *Enforcement* and K, *Modification of Development Standards*, have not been implemented through the end of 2013. As such, the analysis for these two subsections is a brief summary of the intent of the provision. Subsection L, *Implementation Provisions*, provides a schedule for completion of many of the compliance plans and action item requirements of the CSD upon the original approval; those milestones have been completed by the oil field operator. The discussion of Subsection L is therefore provided in a tabular format providing the completion date of each requirement.

A table summarizing the findings and recommendations of this Periodic Review is attached as Appendix B.

**1.7 SUMMARY OF RECOMMENDATIONS**

This Periodic Review has resulted in a number of recommendations to enhance the implementation of the provisions of the CSD. These recommendations do not require a modification or change to the language of the CSD ordinance; rather, the recommendations are improvements in the method of implementation or compliance effort of the subject provision as summarized in the table below.

<b>CSD Provision</b>	<b>Summary of Recommendation</b>
E.1.a	In response to requests made by the public, it is recommended that the annual Community Alert Notification (CAN) tests include interested residents.
E.10	Recommendation that FM O&G schedule installation of the remaining landscaping phases to achieve the landscaping required by this provision in a timely manner.
E.15.a	Recommendation that the Operator continue the use of metal and or plastic bins and tanks consistent with current practice as the elimination of the use of below ground sumps is considered to be a significant environmental benefit.
E.19	Based on comments by the RWQCB regarding potential additional monitoring locations, it is recommended that the Operator coordinate with the RWQCB and install additional groundwater monitoring wells if deemed necessary.
E.20	Due to un-authorized access through damaged fencing, it is recommended the ECC and the Operator increase monitoring of the condition of the perimeter fencing and conduct any necessary repairs as soon as possible.
E.26.c.x	In consideration of the usefulness and substantial costs associated with the preparation of the topographic vertical profiles, it is recommended considering removing the subject figures/maps from the Annual Drilling Plan until the information is deemed useful for inclusion in future plans.
E.28.b	It is recommended that the Operator facilitate better coordination when scheduling reworking and the other types of rigs at the oil field to avoid concentrating too many rigs in one area.
F.3	A comprehensive SIMQAP audit has not been conducted to date. It is recommended that a SIMQAP audit be conducted over the next year in coordination with the EQAP audit and that appropriate interested regulatory agencies be noticed of the audit for participation as applicable.
F.4	Due to the fact that unannounced drills have not taken place in the past, it is recommended that efforts be made to ensure that unannounced drills take place at the oil field as allowed for by the provision of the CSD. The Department of Regional Planning will coordinate with the Fire Department to ensure that unannounced drills occur in the future.
J.1.a	In response to requests by the public to update CAP membership, allow new members to fill vacant panel seats and replace absentee members, the DRP Director will review CAP membership and determine how to proceed under the existing provision of the CSD.
J.2.a	In response to public input on the 2013 Community Meeting, it is recommended that agendas for future Community Meetings be specific to oil field operations and issues and that measures be implemented to ensure questions from the public are addressed appropriately.



## 2.0 Inglewood Oil Field Background

The Inglewood Oil Field has been in operation for over 82 years with over 1,600 wells being drilled during that time throughout the historical boundaries of the oil field. Current activities at the Inglewood Oil Field involve extracting oil and gas from subsurface reservoirs located between 500 and 10,000 feet deep, processing the crude oil to remove water and processing the gas to remove hydrogen sulfide and gas liquids. Crude oil is then shipped by pipeline to area refineries to be processed into gasoline and other products. The gas is shipped by pipeline to The Gas Company for end use by consumers and industry or is shipped to area refineries for use in the refining processes. Processing activities at the Inglewood Oil Field include, but are not limited to, the following:

- Gross Fluid Production Gathering and Testing;
- Crude Oil Handling;
- Water Processing;
- Water Injection;
- Gas Gathering/Gas Processing;
- Well Drilling, Maintenance and Workovers; and
- Ancillary Systems.

The average production volumes from the Inglewood field for 2014 were 7,300 barrels per day (bpd) oil, 350,000 bpd water, and 3,500 thousand standard cubic feet per day (mscfd) gas (as of December 2014).

The current operator of the oil field is Freeport-McMoRan Oil & Gas, a division of Freeport-McMoRan Copper & Gold Inc. (NYSE: FCX). Freeport-McMoRan's oil and gas operations are located onshore and offshore in California, the Gulf Coast Region, the Gulf of Mexico and the Rocky Mountains. The oil and gas division is headquartered in Houston.

### **3.0 Summary of Previous Environmental Reviews**

Prior environmental reviews on the Inglewood Oil Field with a nexus to the provisions of the CSD include the *Final Environmental Impact Report, Baldwin Hills Community Standards District, October 2008*, the *Settlement Agreement and Mutual Release, July 15, 2011*, and the *Annual Well Increase Evaluation, December 2011*. In addition, Stipulation 8 of the Settlement Agreement required a supplemental air quality monitoring study which was initiated (Baldwin Hills Air Quality Study) in June 2012 with the final report dated February 2015.

#### **3.1 BALDWIN HILLS CSD FEIR**

The *Final Environmental Impact Report, Baldwin Hills Community Standards District, October 2008* (FEIR) is the environmental document that was prepared under the California Environmental Quality Act (CEQA). The FEIR was used by the general public and Los Angeles County as one element in the decision-making process for adoption of the CSD for the Inglewood Oil Field. The provisions and requirements of the CSD were developed in part from the mitigation measures identified in the FEIR. The FEIR is available on the Los Angeles County Department of Regional Planning web site.

#### **3.2 SETTLEMENT AGREEMENT**

In November 2008 the adequacy of the CSD measures in protecting human health and the environment and the FEIR were legally challenged. The litigation was brought by the following petitioners representing the public and public groups; Community Health Councils, Inc., Natural Resources Defense Council, Mark Salkin, the City of Culver City, Citizens Coalition for a Safe Community and the Concerned Citizens of South Central Los Angeles. The result of this legal action was the *Settlement Agreement and Mutual Release, July 15, 2011* as negotiated by the various public parties, Los Angeles County and Plains Exploration and Production Company (PXP), the operator of the oil field at the time. The Settlement Agreement contains additional or revised requirements on: slant drilling, noise, the number of drill rigs, the number of wells, a health assessment and environmental justice study, a clean technology assessment, an electrical distribution study, supplemental air quality monitoring, flaring stipulations, well plug dimensions, landscaping, oil field cleanup Plan, a hydraulic fracturing study, and revised review based on reduced production.

The additional or revised requirements are discussed where applicable in the following analysis of the CSD provisions sections of this document and the *Settlement Agreement and Mutual Release* document is attached as Appendix C. Stipulation 5 of the Settlement Agreement, the *Health Assessment and Environmental Justice Study*, required a study in addition to the updated health risk assessment condition of CSD Provision E.2.k. The study followed a report completed by the County Department of Public Health dated February 2011. The February 2011 Study analyzed the mortality rates, low birth rate births, birth defects, and cancer rates of the communities surrounding the Inglewood Oil Field as compared to Los Angeles County as a whole.

The report was followed with an updated report as required by the Settlement Agreement, based on community input, a community survey, and additional data obtained from drilling activities at the oil field.

The County received significant input from the public on the health risk assessment, through discussion at Community Advisory Panel (CAP) meetings and in comments solicited for the Periodic Review. The public has requested continued health monitoring by County Public Health, a health risk assessment using the methodology outlined by the World Health Organization, door to door surveys for cancer cases in the surrounding communities, more detail on the chemicals used at the oil field, and commented that the health risk assessment was inadequate. In a letter dated September 25, 2013, Community Health Councils, Inc. (CHC) commented that the health risk assessment used inappropriate survey methodology, an insufficient level of reporting and that the document failed to include critical data collected from CSD required monitoring of the oil field. Further, the CHC letter comments that the report did not meet the environmental justice requirement of the Settlement Agreement stipulation and requested a supplemental study.

### **3.3 ANNUAL WELL INCREASE EVALUATION**

Provision 4.b of the Settlement Agreement allows for a modification to the number of wells drilled in a calendar year. In order for the modification to be approved, the County must evaluate whether the CSD has been effective in protecting the health, safety, and general welfare of the public. This analysis, the *Annual Well Increase Evaluation*, was completed in December 2011 and included a review of the following CSD compliance subject areas; noise, vibration, air emissions, odors, ground movement, visual and aesthetics, hazards, fire protection and emergency response, and ground water quality. The results of the review concluded that for these areas of review, the CSD has been effective in protecting the health, safety, and general welfare of the public. Additional detail on the report is provided in the following applicable analysis of the CSD provision sections of this document; the *Annual Well Increase Evaluation* is included as Appendix D.

### **3.4 BALDWIN HILLS AIR QUALITY STUDY**

Stipulation 8, *Air Quality Monitoring*, of the Settlement Agreement required a supplemental air quality monitoring study to address stakeholder concerns on potential acute and chronic exposure to air contaminants from the Inglewood Oil Field. Sonoma Technology Inc. was selected by the County to perform the Air Quality Study (Study) which commenced June 2012 consistent with the Settlement Agreement deadline of July 15, 2012. The monitoring was conducted between November 2012 and November 2013, and the report was finalized in February 2015.

The primary focus of the Study was to quantify the air toxic emissions from the Inglewood Oil Field operations and assess the health risk of both acute and chronic exposure to the emissions of oil field operations. The Study also estimated other area

sources of toxic emissions and, to the extent feasible, assessed the contribution of the oil field to the overall health risk in the areas surrounding the oil field.

The Study reviewed 37 air toxics emitted by Inglewood Oil Field operations and conducted a hazard prioritization analysis to identify the pollutants of greatest concern to be analyzed in the Study. The following pollutants were identified; diesel particulate matter (DPM), cadmium, benzene, nickel, formaldehyde, mercury, manganese, acrolein, arsenic, and lead. Four monitoring stations were set up along the perimeter of the oil field in approximate north, south, east, and west locations. The Study was conducted for one year for DPM and, due to the availability and expense of the monitoring devices, 2.5 months for the other pollutants.

Results of the air monitoring data were used to calculate the health risk of acute and chronic exposure to the air toxics emitted from oil field operations. The health risk estimates were completed pursuant to the risk assessment guidelines outlined by the California EPA Office of Environmental Health Hazard Assessment (OEHHA) following the same methodology as used in the SCAQMD Multiple Air Toxic Exposure Study (MATES) studies. The MATES study is a monitoring and evaluation study conducted in the South Coast Air Basin; the study included a monitoring program, an updated emissions inventory of toxic air contaminants, and a modeling effort to characterize risk across the Basin. The study focuses on the carcinogenic risk from exposure to air toxics. The fourth such study, MATES IV, was recently completed with the draft report dated October 2014.

The Baldwin Hills Air Quality Study determined the primary toxic pollutant associated with excess cancer risk to be DPM; the determination is consistent with the Draft MATES IV study results. The results for excess cancer risk attributed to Inglewood Oil Field operations ranged from less than 1 per million to the west and south of the oil field to 6.7 per million on the east side of the oil field. Total excess cancer risk from all area sources plus the oil field was estimated at 340 per million, with vehicle exhaust the primary cause. Therefore, results of the Study indicate the Inglewood Oil Field contribution to the total area excess cancer risk is less than 2% of the total. Results of the MATES IV determined an average excess cancer risk value for the Los Angeles Basin at 418 per million. Both the MATES IV study and the Baldwin Hills Air Study determined that the primary cancer risk in the area is attributable to vehicle diesel exhaust (DPM), a determination further evidenced by the fact that the highest cancer risk areas identified in the MATES IV study were near the Port of Long Beach, the Port of LA, and along transportation corridors. Results for non-cancer chronic hazard potential and acute exposure values from oil field operations were both below 1.0, the health reference level where no adverse human health effects would occur.

## 4.0 Analysis of the CSD Provisions

This section provides detail on the implementation of each CSD provision and a determination as to whether the requirements have worked as intended. The applicability of potential new technologies that may improve and or lessen the environmental impact of oil field operations is noted in the New Technology section. Recommendations to changes in the implementation or language of the provision are discussed in the last two sections of the review of each provision.

**D.1 Operational Limits.** *No surface drilling or other surface oil operations shall be allowed within the portions of the district consisting of the Southern California Edison facility, the Holy Cross Cemetery, and the small non-contiguous parcel located east of La Brea Avenue.*

### **Summary of Complaints:**

The County has not received any complaints regarding the operational limits provision of the CSD.

### **Summary of Issues Raised by the Public:**

The public has expressed concern at the Community Advisory Panel (CAP) meetings about the potential, due to slant drilling technology, for the oil field operator to drill outside the boundaries of the CSD. The concern was not specific to the operational limits provided by this provision but rather the potential for well bottom hole locations to be under a residence and thus outside the CSD boundary. The County and the oil field operator have confirmed that no surface or bottom hole well locations have been drilled outside the DOGGR established boundaries of the CSD/Inglewood Oil Field. Down-hole operations are regulated by DOGGR.

### **Analysis of Compliance and Effectiveness:**

As noted above, no surface or bottom hole well locations have been drilled outside the boundaries of the Inglewood Oil Field. In addition, no surface drilling operations have been conducted within the areas consisting of the Southern California Edison facility, the Holy Cross Cemetery, or the small non-contiguous parcel located east of La Brea Avenue. All new drill sites are subject to review and approval by the County pursuant to Provision E. 26, the *Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan* and this provision prevents approval of surface hole locations in those subject areas.

The provision is considered to be fully effective at this time and no further analysis is recommended.

### **New Technology:**

This provision prevents drilling from occurring in certain geographic areas, thus a discussion on new technology is not applicable.

### **Recommendations to Changes in Implementation:**

The provision has been implemented and is considered to be fully effective at this time, no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The provision is considered to be fully effective at this time, no recommendations to the CSD language are recommended.

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***E.1 Fire Protection and Response.*** *The operator shall comply with the following provisions:*

*a. Community Alert Notification System ("CAN"). The operator shall maintain and test on an annual basis a CAN for automatic notification of area residences and businesses in the event of an emergency arising at the oil field that could require residents or inhabitants to take shelter, evacuate, or take other protective actions.*

*b. Spill Containment Response Training. The operator shall conduct annual spill containment response training and shall at all times have available, on-site, sufficient and properly maintained equipment and/or facilities so that a spill of the entire contents from the largest oil tank on the oil field can be responded to and contained in a timely manner to reduce the likelihood that the spill reaches a catch basin.*

*c. Emergency Response Plan ("ERP"). The operator shall at all times maintain and fully implement and comply with all provisions of an emergency response Plan and shall further ensure that the then current ERP satisfies all rules and regulations of the United States Environmental Protection Agency and California Code of Regulations relating to emergency action plans and spill prevention control and countermeasure plans, as well as the rules, regulations, and requirements of the California Office of Spill Prevention and Response. The ERP shall also satisfy the rules and regulations of the United States Department of Transportation relating to onshore pipeline spills.*

**Summary of Complaints:**

No complaints regarding the annual operation testing of the CAN system have been received by the County and the CAN system has not been utilized for an emergency situation at the Inglewood Oil Field to date. Spill containment response training is conducted annually onsite and no complaints have been received by the County regarding the training. County has not received any complaints regarding the ERP.

**Summary of Issues Raised by the Public:**

The CAN system has been discussed at CAP meetings noting that the annual system tests do not include the area residents. Several members of the CAP and public have requested to be added to the list of contacts utilized for the annual testing. The potential for confusion with a horn/siren based system was noted in the *PXP 2009 Community Alert Notification (CAN) System CAN System Plan* as discussed below in the analysis section. No issues on the spill containment response training or the ERP have been raised by the public to date. The public provided some discussion at the Community Advisory Panel (CAP) meeting September 26, 2013 regarding an incident involving a wash tank overflow, however, the discussion was not specific to training and the fluid was captured in a secondary containment basin (see review of CSD Provision 3.d.i. for additional detail) consistent with the requirement of the CSD.

**Analysis of Compliance and Effectiveness:**

A CAN system is a system that allows for an emergency alert, message, or notification to people located within a specific area. The oil field CAN system is designed to provide such notification to area residents and businesses of an emergency situation that would require one to take shelter, evacuate or take other protective actions. There are two main types of CAN systems, a horn/siren system and a reverse dialing system. The *PXP 2009 Community Alert Notification (CAN) System* approved by the Los Angeles County Fire Department (County Fire Department) on February 18, 2010 discussed both types of systems. The horn/siren type system has the potential to confuse the public due to the difficulties in noticing the public of system testing (false alarm). Therefore, a reverse dialing system provided by the vendor *CodeRED* was installed on September 16, 2010. The system has been successfully tested each year since installation with test dates occurring on December 29, 2010, November 22, 2011, December 19, 2012, and December 18, 2013. The CAN test connects to a subset of the notification list made up of local agency and Fire Department contacts; the general public is not contacted during the test to avoid the potential for unnecessary alarm. As noted above, several members of the CAP and public have requested to be added to the notification list for the annual testing. The *PXP 2009 Community Alert Notification (CAN) System Plan* is available at <http://www.inglewoodoilfield.com>.

Annual spill containment response training has been completed on February 4, 2009, February 17, 2010, February 17, 2011, February 1, 2012, and February 12, 2013. As documented in the *PXP 2009 Tank Leak Detection and Containment at Inglewood Oil Field* report, approved in May 2009, all tanks have secondary containment consisting of a wall, berm, or combination of the two types. The report also concluded that all tank secondary containment structures comply with California Division of Oil, Gas and Geothermal Resources (DOGGR) requirements and that the volume of the available secondary containment is capable of containing volumes in excess of the full volume of each tank.

The *Spill Prevention, Control and Countermeasure Plan (SPCCP)*, required under CSD Provision E.17.b., provides detail on the maintenance of tank and related equipment at the oil field which include inspection programs, corrosion prevention/corrosion monitoring techniques, and clean up equipment. The Plan also includes potential spill scenarios for each tank with containment calculations documenting the adequacy of the containment structures. Review and use of this Plan is a component of the annual spill containment response exercise.

The ERP, current version dated June 2013, is submitted to the following agencies: DOGGR, California Department of Fish and Wildlife Office of Spill Prevention and Response (OSPR), U.S. Environmental Protection Agency Region 9, California State Lands Commission Marine Facilities Division Planning Branch, and the U.S. Department of Transportation Office of Pipeline Safety. Specific response considerations for biological resources were added to the ERP in March 2010 per CSD Provision E.7.a.

The ERP is utilized in annual emergency response drills as required by CSD provision F.4. The annual drills may be attended by County and Culver City Fire Departments. CSD Provision F.4 requires that the drills demonstrate the adequacy of the ERP. Annual emergency response drills have taken place on November 24, 2009, November 3, 2010, October 26, 2011, November 7, 2012, and November 6, 2013.

The report prepared by the County in response to the request by PXP in October 2011 to increase the annual number of wells allowable for drilling or redrilling, the *Annual Well Increase Evaluation, December 2011*, includes analysis on the implementation of the hazards/fire protection/emergency response provisions of the CSD. The report documented the full implementation of the fire protection and response provisions and that the likelihood of spills has been substantially reduced and the protection of safety, health and general welfare of the public has been increased.

This provision of the CSD is considered to be fully effective at this time, no further modifications in implementation or language are recommended.

**New Technology:**

The CAN system was recently upgraded to include notifications via cellular phones in addition to the original land line based system; this represents a significant improvement in the ability of the system to contact the public that could potentially be affected by an emergency at the oil field.

The SPCCP is reviewed, evaluated, and updated as necessary every five years as required by Section 1.5 of the Plan. A component of the evaluation includes review of the applicability of new prevention and control technology which may significantly reduce the likelihood of a spill event. The annual spill response training also allows for new technology to be reviewed and implemented as applicable.

The annual emergency response drills and updates to the ERP document allow for new technology and techniques to be introduced and included as they become available.

**Recommendations to Changes in Implementation:**

In response to the interest and request by the CAP and members of the public, it is recommended that the annual CAN testing include CAP members and other interested residents. Further, it is recommended that FM O&G prepare a message for the testing similar to the message utilized for the Emergency Broadcast System. The message should clearly state that a test is being conducted, and that in the event of an actual emergency the listener would be directed what to do and where to obtain more detailed information.

The spill containment response training and ERP have been fully implemented and are tested each year, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The existing CSD language requires annual updating and testing of the fire protection and response provisions, thus no changes in CSD language are recommended.



**E.2 Air Quality and Public Health.** *The operator shall at all times conduct oil operations to prevent the unauthorized release, escape, or emission of dangerous, hazardous, harmful and/or noxious gases, vapors, odors, or substances, and shall comply with the following provisions:*

*a. Emission Offsets. The operator shall obtain emission offsets or RECLAIM credits as defined and required by SCAQMD Regulations for all new or modified emission sources that require a new or modified SCAQMD permit.*

*b. New Gas Plant. No new gas plant or flare shall be installed at any steam drive plant that may be constructed on the oil field. The operator shall connect any such steam drive plant to the existing gas plant to eliminate the need for a new gas plant or flare at the steam drive plant.*

*c. Odor Minimization. At all times the operator shall comply with the provisions of an odor minimization Plan that has been approved by the director. The odor minimization Plan shall include any measures requested by the director. The Plan shall provide detailed information about the facility and shall address all issues relating to odors from oil operations. Matters addressed within the Plan shall include setbacks, signs with contact information, logs of odor complaints, method of controlling odors such as flaring and odor suppressants, and the protocol for handling odor complaints. The odor minimization Plan shall be reviewed by the operator on an annual basis to determine if modifications to the Plan are required. Any modifications to the odor minimization Plan shall be submitted to the director for review and approval.*

*d. Air Monitoring Plan. At all times the operator shall comply with the provisions of an air monitoring Plan that has been approved by the director. The air monitoring Plan shall include any measure requested by the director. During drilling, redrilling, and reworking operations, the operator shall monitor for hydrogen sulfide and total hydrocarbon vapors as specified in the approved Plan. Total hydrocarbon vapors shall be monitored at the gas plant as specified in the approved Plan. Such monitors shall provide automatic alarms that are triggered by the detection of hydrogen sulfide or total hydrocarbon vapors. For drilling, redrilling, or reworking monitors, the alarms shall be audible and/or visible to the person operating the drilling, redrilling, or reworking equipment. For the gas plant monitors, the alarms shall be audible or visible to the gas plant operator. Actions to be taken shall be as follows when specified alarm levels are reached:*

*i. At a hydrogen sulfide concentration of equal to or greater than five parts per million but less than 10 parts per million, the operator shall immediately investigate the source of the hydrogen sulfide emissions and take prompt corrective action to eliminate the source. The corrective action taken shall be documented in the drilling, redrilling, or reworking log. If the concentration is not reduced to less than five parts per million within four hours of the first occurrence of such concentration, the operator shall shut down the drilling, redrilling, or reworking operations in a safe and controlled manner, until the source of the*

*hydrogen sulfide emissions has been eliminated, unless shutdown creates a health and safety hazard.*

*ii. At a hydrogen sulfide concentration equal to or greater than 10 parts per million, the operator shall promptly shut down the drilling, redrilling, or reworking operations in a safe and controlled manner until the source of the hydrogen sulfide emissions has been eliminated, unless shutdown creates a health and safety hazard. The corrective action taken shall be documented in the drilling, redrilling, or reworking log. When an alarm is received, the operator shall promptly notify the county fire department - Health Hazardous Materials Division, the Culver City Fire Department, the Office of Emergency Services, and the SCAQMD.*

*iii. At a total hydrocarbon concentration equal to or greater than 500 parts per million but less than 1,000 parts per million, the operator shall immediately investigate the source of the hydrocarbon emissions and take prompt corrective action to eliminate the source. The corrective action taken shall be documented in the drilling log for drilling, redrilling, or reworking and in the gas plant log for the gas plant. If the concentration is not reduced to less than 500 parts per million within four hours of the first occurrence of such concentration, the operator shall shut down the drilling, redrilling, reworking, or gas plant operations in a safe and controlled manner, until the source of the hydrocarbon emissions has been eliminated, unless shutdown creates a health and safety hazard.*

*iv. At a total hydrocarbon concentration equal to or greater than 1,000 parts per million, the operator shall promptly shut down the drilling, redrilling, or reworking or gas plant operations in a safe and controlled manner, until the source of the hydrocarbon emissions has been eliminated, unless shutdown creates a health and safety hazard. The corrective action taken shall be documented in the drilling log for drilling, redrilling, or reworking and in the gas plant log for the gas plant. When an alarm is received, the operator shall promptly notify the county fire department - Health Hazardous Materials Division, the Culver City Fire Department, and the SCAQMD.*

*v. All the monitoring equipment shall keep a record of the levels of total hydrocarbons and hydrogen sulfide detected at each of the monitors, which shall be retained for at least five years. The operator shall, on a quarterly basis, provide a summary of all monitoring events where the hydrogen sulfide concentration was at five parts per million or higher and the total hydrocarbon concentration was at 500 parts per million or higher to the fire chief. At the request of the fire chief, the operator shall make available the retained records from the monitoring equipment.*

*e. Portable Flare for Drilling. The operator shall have a gas buster and a portable flare, approved by the SCAQMD, at the oil field and available for immediate use to remove any gas encountered during drilling operations from drilling muds prior to the muds being sent to the shaker table, and to direct such gas to the portable flare for*

combustion. The portable flare shall record the volume of gas that is burned in the flare. The volume of gas burned in the flare shall be documented in the drilling log. The operator shall notify the fire chief and the SCAQMD within 48 hours in the event a measurable amount of gas is burned by the flare, and shall specify the volume of gas that was burned in the flare. No drilling or redrilling shall be conducted in areas that are known to penetrate the Nodular Shale zone unless a fully operational and properly maintained gas buster and portable flare are installed on the rig. All other drilling and redrilling operations shall be conducted so that any measurable gas that is encountered can, and will, be retained in the wellbore until the gas buster and portable flare are installed on the rig, after which the gas will be run through the system. The operator shall immediately notify the fire chief and the SCAQMD in the event any gas from drilling or redrilling operations is released into the atmosphere without being directed to and burned in the flare.

f. *Oil Tank Pressure Monitoring and Venting.* All oil tanks that contain or could contain oil shall have a fully operational pressure monitoring system that continuously measures and digitally records the pressure in the vapor space of each tank. The detection system shall notify the operator via an alarm when the pressure in the tank gets within 10 percent of the tank relief pressure. In the event of an alarm, the operator shall immediately take corrective action to reduce the tank pressure. The corrective action shall be documented in the operator's log. The operator shall notify the fire chief and the SCAQMD within 24 hours if the pressure in any tank covered by this subsection ever exceeds such tank's relief pressure. Within seven calendar days after any tank vapor release, the operator shall report the incident to the SCAQMD as a breakdown event pursuant to Rule 430, and shall provide the fire chief with a written report of the event and the corrective measures undertaken and to be undertaken to avoid future oil tank vapor releases. The operator shall make any changes to such report that may be required to obtain approval from the fire chief and the SCAQMD, and shall promptly institute all corrective measures called for by the report.

g. *Odor Suppressant for Bioremediation Farms.* When loading material or tilling material at the bioremediation farms, the operator shall use an odor suppressant such that no odor from the bioremediation farms can be detected at the outer boundary line.

h. *Odor Suppressant for Drilling and Redrilling Operations.* The operator shall use an odor suppressant spray system on the mud shaker tables for all drilling and redrilling operations to ensure that no odors from said operations can be detected at the outer boundary line.

i. *Closed Systems.* The operator shall ensure all produced water and oil associated with production, processing, and storage, except those used for sampling only, are contained within closed systems at all times.

j. *Meteorological Station.* The operator shall maintain and operate a meteorological station at the oil field in good operating condition and in compliance with all applicable Environmental Protection Agency ("EPA") and SCAQMD rules, regulations, and guidelines, and to the satisfaction of the director. The operator shall conduct an audit of

*the meteorological station on an annual basis and submit the results of the audit to the SCAQMD and the director. The operator shall maintain the data files for the meteorological station for a period of not less than 10 years. All such data shall be available upon request to the SCAQMD and the director.*

*k. Updated Health Risk Assessment. After every five years of operation of the meteorological station, the operator shall provide the previous five years of metrological data to the SCAQMD and the director. If the SCAQMD or the director determines that the previous five years of metrological data from the oil field could result in significant changes to the health risk assessment that was conducted as part of the Baldwin Hills Community Standards District Environmental Impact Report, then the county may elect to re-run the health risk assessment using the previous five years of metrological data from the metrological station.*

*l. Off-Road Diesel Construction Equipment Engines. All offroad diesel construction equipment shall comply with the following provisions:*

*i. Utilize California Air Resources Board ("CARB") EPA Certification Tier III or better certified engines or other methods approved by the CARB as meeting or exceeding the Tier III standard or Tier II certified engines as long as no drilling or redrilling occurs during construction.*

*ii. Utilize a CARB Verified Level 3 diesel catalyst. The catalyst shall be capable of achieving an 85 percent reduction for diesel particulate matter. Copies of the CARB verification shall be provided to the director. Said catalysts shall be properly maintained and operational at all times when the off-road diesel construction equipment is in use.*

*m. Drill Rig Engines. All drilling, redrilling, and reworking rig diesel engines shall comply with the following provisions:*

*i. Utilize CARB/EPA Certification Tier II or better certified engines, or other methods approved by CARB as meeting or exceeding the Tier II standard.*

*ii. Utilize second generation heavy duty diesel catalysts capable of achieving 90 percent reductions for hydrocarbons and for particulate matter smaller than 10 microns. Said catalysts shall be properly maintained and operational at all times when the diesel engines are running.*

*n. Drilling and Redrilling Setbacks. The following setbacks shall apply within the oil field for drilling or redrilling:*

*i. At least 400 feet from developed areas.*

*ii. At least 20 feet from any public roadway.*

*o. Construction Schedule. To reduce construction air emissions, no overlap shall be permitted in major facility construction and installation activities such as the steam drive plant, the water processing facility, or the oil cleaning plant.*

*p. Fugitive Dust Control Plan. The operator shall comply with the provisions of a fugitive dust control Plan that has been approved by the director. The Plan shall be based upon the requirements of SCAQMD Rule 403 and the SCAQMD CEQA Guideline Fugitive Dust Control Measures. The fugitive dust control Plan shall be reviewed by the operator every five years to determine if modifications to the Plan are required. Any modifications to the fugitive dust control Plan shall be submitted to the director for review and approval. The fugitive dust control Plan shall include any measured requested by the director.*

**Summary of Complaints:**

The County has logged 94 odor complaints and 3 dust complaints from the public on oil field operations from December 2008 through December 2013. Determining the source of an odor is an extremely difficult task due to the transient nature of an odor itself and the myriad of potential odor sources both from the oil field and the urbanized areas surrounding the oil field. As such, the source for the majority of the complaints associated with odors was not able to be unequivocally identified in follow up investigations. Air quality monitoring data, the wind speed and direction from the onsite meteorological monitoring station, field visits, and assistance from SCAQMD staff have been used to investigate odor complaints. As discussed below, the oil field air monitoring equipment has not detected an exceedance of the pollutant criteria stipulated in subsection E.2.d.i through E.2.d.iv nor has any elevated data been correlated with the time and day of any of the odor complaints.

Staff from the SCAQMD have assisted with the follow up investigation on several of the odor complaints and have detected odors on several occasions. Two of these investigations determined the source of the oil field as the cause of the odor. In one instance, the cause was determined to be a broken air-line on a compressor that caused several tanks to vent to the atmosphere. This incident was documented in an equipment breakdown report filed with the SCAQMD dated January 20, 2011. Dead animals such as road kill and skunks, unrelated to oil field operations, were other sources of odor that were positively identified during follow up investigations. Two of the three complaints for dust were associated with very high wind events where the onsite meteorological station measured wind speeds above 30 mph.

**Summary of Issues Raised by the Public:**

Input on noise and odor issues at the oil field has been received at the Community Advisory Panel (CAP) meetings, in comments solicited for the Periodic Review, and as part of the Settlement Agreement dated July 15, 2011 negotiated between concerned public parties, the County and PXP (now FM O&G). Issues raised have been associated with odors, dust, requests for additional monitoring, that the results of the follow up investigations on odor complaints are not conclusive or well documented, and that the risk assessment completed by the County Health Department is incomplete.

The Settlement Agreement required supplemental air quality monitoring to assess the risk of both acute and chronic exposure to air contaminants from oil field operations. The monitoring study included sampling and analysis for air toxics including diesel particulate matter, gaseous volatile organic compounds (VOCs), and trace metals. Four monitoring sites were identified and used at the perimeter of the oil field corresponding to locations to the north, south, east, and west of the facility. The monitoring equipment was housed in a trailer with meteorological instrumentation located on a 10 meter tower to collect study site specific wind speed, wind direction and temperature data. The air monitoring study was completed in the fall of 2013; the final report was released in February 2015.

The Settlement Agreement also contains a requirement regarding operation of the gas plant back up flare. The stipulation allows for the operation of only one gas plant flare at any given time and requires the installation of the new flare be completed within 180 days of receipt of the SCAQMD permit for the flare. The Operator does not operate the gas plant flares simultaneously; the installation of the new flare was completed in 2012.

In October, 2012, in response to an inquiry from a member of the public regarding potential odors from soil being used at the oil field for a slope stabilization project, staff from the SCAQMD inspected the soil with Volatile Organic Compound (VOC) monitoring equipment. The soil in question was determined to be remediated soil from the oil field facility bio-remediation farm; however, the results of the SCAQMD inspection did not detect a significant odor. SCAQMD staff performed follow up sampling at the bio-remediation farm and discovered VOC contaminant levels above the 50 parts per million (ppm) criteria outlined in SCQAMD Rule 1166 and a Notice of Violation (NOV) was issued to the Operator (NOV #P56565 dated 10/16/12). The impacted soil was removed and transported to an approved offsite facility for disposal. As a result of the NOV, the operation of the bio-remediation farms at the oil field has been temporarily halted while the Operator installs the modifications and upgrades as required by a new RWQCB permit issued February 7, 2013. FM O&G and the SCAQMD reached a settlement relating to the NOV on 1/28/13 and the issue has been closed.

**Analysis of Compliance and Effectiveness:**

Subsection E.2.a requires the operator of the oil field to obtain emission offsets or RECLAIM credits for all new or modified emission sources requiring a SCAQMD permit. To date, the oil field has obtained five SCAQMD permits; one for the new flare and four for the installation of new tanks. None of these permits required emission offsets or the purchase of RECLAIM credits. The requirements listed under E.2.b have also not been implemented to date because a new gas plant or new steam drive plant has not been proposed or installed.

The Odor Minimization Plan was submitted on February 25, 2009 and revised and approved on April 15, 2010. The Plan describes the four main sources of potential odors at the oil field as fugitive emissions from equipment, operation of the bioremediation farms, drilling muds, and accidental release from drilling activities. The Plan identified the use of suppressants for odor minimization at the bioremediation farms and for drilling muds and the use of a portable flare/gas buster for drilling

operations. The use of closed systems for all equipment associated with produced water and oil, consistent with provision E.2.i, is described for odor minimization from fugitive emissions.



Odor Suppressant

Odor suppressant is sprayed onto the bio farms during loading, prior to tilling and during tilling operations as needed. Drilling muds and cuttings are sprayed with suppressants as they pass through the “mud shakers” via overhead misters connected to a drum of liquid suppressant. A portable flare/gas buster, as required by provision E.2.e, is available for use at drilling and redrilling sites for potential odors from drilling operations. These odor minimization measures are inspected for operation to document compliance during the periodic inspections completed by the County Environmental Compliance Coordinator (ECC).

The Air Monitoring Plan was submitted on February 29, 2009, revised in November and December of 2009 and approved by the County on January 4, 2010. The Plan presents information on meteorological conditions at the oil field, air contaminants associated with oil and gas operations, air monitoring instrumentation and procedure requirements, and air monitoring Plan training for oil field personnel. Portable air monitoring trailers with Total Hydrocarbon (THC) and Hydrogen Sulfide (H<sub>2</sub>S) monitors that meet the specifications outlined in the Plan are employed at drilling and redrilling sites. The drilling site monitor data is recorded on a data logger which is downloaded and transferred to the oil field air monitoring data base at the end of each drilling project. The portable monitoring system includes an alarm system with both visual and auditory capabilities; the sound alarm is turned off at night pursuant to the requirements of the Quiet Mode Drilling Plan (QMDP).



Air Quality Monitoring Trailer

Air monitoring at the gas plant consists of THC sensors located at each of the four corners of the gas plant facility footprint. The sensors are connected to the gas plant computer Supervisory Control and Data Acquisition (SCADA) system which provides for real time data access by gas plant personnel and alarm capability. The SCADA system logs the monitoring data for later download to the oil field air quality monitoring database.

The CSD does not require an annual compliance report for the air quality monitoring data, however, the data must be available to the County for review upon request. Air monitoring results along with the monitoring sensor calibration data are reviewed by the County ECC periodically during site visits and at the annual Environmental Quality Assurance Program (EQAP) audit. To date, no exceedance of the air monitoring criteria specified in subsections E.2.d.i through E.2.d.iv has been measured at the oil field and



thus the drilling or gas plant corrective actions required by these subsections have not been necessary to implement.

The portable flare for drilling required by subsection E.2.e was custom built by PXP, the former operator of the oil field. The flare system was reviewed, approved, and permitted by the SCQAMD and meets the requirement for recording the volume of gas burned. The oil field has SCAQMD permits for two of these portable flare systems. Current operating procedure at the oil field calls for the flare to be installed at every drilling and re-drilling operation whereas subsection E.2.e requires that only drilling activity in the Nodular Shale zone require the installation of the flare system or if gas in the well bore is encountered. As noted above, no gas has been flared through the portable gas flare system to date.

All tanks that contain oil and/or produced water are connected to the oil field operational pressure monitoring system as required by subsections E.2.f and E.2.i. The system is connected to the SCADA system and is monitored by gas plant personnel. The tanks and associated valves, pipeline flanges, and pressure relief systems are subject to SCAQMD permit requirements and the associated fugitive emissions program. The fugitive emissions program requires quarterly inspections of oil field equipment for fugitive emissions with the use of a portable hand held organic vapor analyzer. The results of these inspections are submitted to the SCAQMD. The oil field uses a third party consultant specializing in air quality monitoring for the fugitive emissions inspection program. The SCAQMD audits the results of the fugitive inspection monitoring program by performing an annual inspection of the subject oil field equipment. The tanks and associated equipment are also subject to the breakdown provisions of AQMD Rule 430. Failure of the pressure monitoring system requires notification and calculation of any air emissions associated with the breakdown. The oil field has filed six breakdown reports in compliance with AQMD Rule 430 since the inception of the CSD.

As discussed above regarding the Odor Minimization Plan, odor suppressants are used at the bioremediation farms and for drilling and re-drilling operations as required by subsections E.2.g and E.2.h. Odor suppressant at the bioremediation farms is applied manually with a sprinkler system when odors are detected during loading, pre-tilling and tilling operations. The odor suppressant system for the drill rig is a custom made mister system where the suppressant is pumped from a drum source up to tubing installed across the top of the mud shaker. Sprinkler type misters are installed in the tubing every few feet and spray the odorant downward over the mud and drill cuttings material. Periodic inspections by the County ECC document the installation and operation of these odor suppressant systems.



Odorant Hose and Spray Nozzle



The meteorological monitoring system required by subsection E.2.j was approved by the SCAQMD in July 2009, installed and tested in December 2009, and was operational on January 21, 2010. Monitoring data is collected on a data logger which is downloaded monthly to the oil field air monitoring data base. The meteorological instrumentation is calibrated annually by instrumentation vendor technicians. The annual Data Validation Reports are posted on the oil field website at <http://www.inglewoodoilfield.com>. Operation of the meteorological station is checked by the ECC during periodic site inspections and the annual Data Validation Report is reviewed during the EQAP audit.

The updated Health Risk Assessment required by subsection E.2.k has not been completed to date, the required 5 years of onsite meteorological data was collected in January 2015, the data is currently under review. Subsections E.2.l and E.2.m require that engines associated with off road diesel construction equipment and drill rig engines, respectively, meet California Air Resources Board (CARB) emission reduction requirements. Subsection E.2.n provides setbacks for drilling or redrilling sites. Review and approval of the *Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan* confirms compliance with these provisions where engine certification documents are checked and drilling locations are reviewed for compliance with setback requirements. Subsection E.2.o, construction schedule limitations for major facility construction, has not been implemented to date because no major construction projects have been proposed or constructed to date.



Meteorological Station

Pursuant to Provision E.2.m, CARB/EPA Certification Tier II or better certified engines and heavy duty diesel catalysts are required for all drilling, redrilling, and reworking rig diesel engines. All rigs operated at the Inglewood Oil Field meet this criteria with most meeting CARB/EPA Tier III engine standards.



Water Truck – Dust Control

The Fugitive Dust Control Plan was submitted on March 26, 2009 and revised and approved in April 2010. The Plan describes potential dust generating activities associated with oil field operations and outlines dust control measures to minimize offsite dust. Some of the primary dust control measures included in the Plan are limiting oil field vehicle speeds to 15 mph, the use of water trucks on unpaved roads, limiting vehicle travel on unpaved roads and parking surfaces, and the use of tarps or soil stabilizers to prevent dust from soil stockpiles.

Other dust control measures include procedures for loading and unloading material from trucks, pipe track out grid devices to knock mud from vehicles leaving the oil field, and minimizing dust generating activities during high wind speed times. As noted above, 2 of the 3 dust complaints were associated with days with wind speeds in excess of 30 mph.

The *Annual Well Increase Evaluation, December 2011*, included a discussion of the effectiveness of the CSD air quality provisions. The report concluded that air emissions criteria had not been exceeded and that the operation of the oil field was in compliance with the requirements for air quality and public health of the CSD. The report further concluded that the CSD has been effective at keeping odors to levels that would be considered protective of the health and general welfare of the public.

The air quality and public health requirements of this provision have been implemented and are ongoing. This condition is considered to be fully effective at this time, no further evaluation is recommended.

**New Technology:**

New emission sources at the oil field require permitting by the SCAQMD and may require offsets or RECLAIM credits. The compliance plans for odor minimization, air monitoring, meteorological monitoring, and fugitive dust are required to be updated periodically or as required by the County. Closed monitoring systems and oil field engines are subject to SCAQMD or CARB rules, respectively. The oil field drill rigs are subject to CARB diesel exhaust reducing programs, those programs include the exhaust emission standards program that requires engine replacement and/or installation of emission control devices on diesel engines. For example, CARB Rule 2449 requires that the diesel engines in the oil field rigs meet specific emissions limitations for pollutants such as NO<sub>x</sub> and diesel particulate matter (DPM). The allowable emissions requirements decrease each year through the year 2023, providing a significant annual decrease in air pollutants from oil well drilling, re-working and maintenance activities associated with the operation of the rigs.

Therefore, technical improvements that provide cleaner burning drill rig engines are currently required at the oil field through the year 2023. In addition, as new technology is developed in air quality monitoring, emission controls, or oil field equipment that can lower the air quality impact of oil field operations, that technology can be implemented by this provision by reference.

**Recommendations to Changes in Implementation:**

This requirement has been implemented and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

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***E.3. Safety and Risk of Upset.*** *The operator shall at all times conduct oil operations in a manner that minimizes risk of accidents and the release of hazardous materials, and shall comply with the following provisions:*

*a. Natural Gas Liquid Blending.* *Natural gas liquids at the gas plant shall be blended with the oil to the maximum allowable pipeline system vapor pressure. Natural gas*

*liquids storage shall be limited to the volume allowed in the risk management Plan approved by the fire department.*

*b. Propane and Natural Gas Liquids Bullet Fire-Proofing. The operator shall install and maintain fire-proofing insulation on all propane and natural gas liquids bullets within the oil field. The fire-proofing insulation shall have a minimum two hour fire rating and otherwise be acceptable to the fire chief. All propane and natural gas liquid bullets shall be equipped with an automatic deluge system.*

*c. Steam Drive Plant Setback. The steam drive plant, if constructed, shall be located at least 1,000 feet from a developed area and shall use urea or equivalent, low toxicity material for any nitrogen oxide emission reduction that is required by the SCAQMD.*

*d. Secondary Containment for Oil. The operator shall comply with the following provisions:*

*i. The operator shall ensure that all existing oil tank areas in the oil field, unless determined by the director to be infeasible, and all the new oil tank areas shall have secondary containment (berms and/or walls) that can contain at least 110 percent of the largest oil tank volume to reduce the likelihood of oil spills entering the retention basins. In the event the director determines that it would be infeasible to provide 110 percent containment for a particular existing oil tank, the operator shall provide such containment as the director determines is feasible.*

*ii. All retention basins in the oil field shall be adequately sized, and maintained to handle a 100-year storm event plus a potential spill of the volume of the largest tank that would drain into each basin.*

*iii. All above ground piping in the oil field that contains or could contain oil shall be protected by basins or secondary containment measures (berms and/or walls).*

**Summary of Complaints:**

The County has not received any public input on the natural gas liquid blending or the fire proofing of the propane and natural gas liquid bullets requirements to date. A steam drive plant has not been constructed to date and no public input has been received by the County. No off site oil or unauthorized storm water discharges have occurred since the implementation of the CSD and no complaints regarding secondary containment for oil have been received by the County.

**Summary of Issues Raised by the Public:**

Provisions 3.a through 3.c are operational requirements developed from the EIR to minimize potential impacts to public safety from the operation of the gas plant, the propane storage and loading facilities, and a potential new steam drive plant. The County has not received



Tank Secondary Containment

any public input on natural gas blending or the propane and natural gas liquid fire-proofing; a new steam drive plant has not been constructed or proposed to date. The overflow of a wash tank that occurred on September 20, 2013 was discussed during a CAP meeting on September 26, 2013. The tank overflowed into the tank overflow line due to a malfunctioned level controller with the amount estimated at 30 barrels of oil with 600 barrels of water. The fluid flowed via a tank overflow pipeline to a second tank, into the second tank overflow line and into a lined secondary containment pit. The oil and water were subsequently removed from the pit and returned to the facility system. Issues raised by the public included testing and maintenance of the level controller, the capacity of the second tank, a recommendation to install backup level controllers, and why the failed level controller did not shut off oil to the tank before the tank reached an overflow volume. FM O&G and the County reported back at the following CAP meeting on October 24, 2013 that the alarm system for the failed tank controller unit properly notified oil field operations staff and that the secondary containment system was sufficient to prevent the fluid from traveling offsite.

**Analysis of Compliance and Effectiveness:**

FM O&G blends the natural gas liquids (NGLs) to the maximum allowable pipeline system vapor pressure as required by the subject CSD provision requirement and for economic reasons. Blending of NGLs can provide several main benefits when added to crude oil; the NGLs can decrease the viscosity and improve the API gravity value of the oil and reduces offsite transportation costs. Current production and operation of the oil field allow for all NGL produced to be blended with the oil and transported off site with the crude oil via pipeline. The storage of the NGL tank is in compliance with the criteria in the Risk Management Plan.

The propane and natural gas liquids bullet fire proofing was completed on February 23, 2009 with the associated documentation submitted to the LA County Fire Department on February 25, 2009. The approved fire proofing system has a two hour fire rating and is equipped with an automatic deluge system. With this fireproofing and deluge system the potential for a propane or natural gas fire at the bullets has been substantially reduced. The *PXP 2009 Third Party Audit of Fire Protection Capabilities at Inglewood Oil Field* report analyzed the oilfield's fire protection capabilities for compliance with National Fire Protection Agency (NFPA) Requirements, the County Fire Code, County Fire Department Regulations, California Code of Regulations, and American Petroleum Institute (API) Standards and Recommended Practices. The report, completed in March 2009, determined that all the tanks, vessels, and other equipment associated with fire potential were in compliance with all referenced codes and requirements and the report further documented the oil field is in compliance with industry best practices for similar facilities.

The *Annual Well Increase Evaluation, December 2011*, included a review of the fire proofing and automatic deluge systems. The report concluded the potential for a propane or natural gas fire at the bullet storage area has been substantially reduced. The report also concluded that the secondary containment and retention basin systems, discussed in more detail below, are adequately sized for both a worst case spill and a 100 year storm event.

A steam drive plant has not been constructed to date. An analysis of the location and emission reduction equipment will be completed by the DRP and SCAQMD during the processing of the project application if such a new plant is proposed. FM O&G does not currently Plan to construct a new steam drive plant.

As documented in the *PXP 2009 Tank Leak Detection and Containment at Inglewood Oil Field* report, approved in May 2009, all tanks have secondary containment consisting of a wall, berm, or combination of the two types. The report also concluded that all tank secondary containment structures comply with DOGGR requirements and that the volume of the available secondary containment is capable of containing volumes in excess of the full volume of each tank.

The oil field contains six retention basins; Dabney Lloyd, Vickers 2 Upper, Vickers 2 Lower, Vickers 1, Stocker, and LAI Last Chance. If these basins discharge, they discharge directly or indirectly to the Los Angeles Department of Public Works (LADPW) storm drains. During the dry season, the basins are maintained to be free of debris and are periodically inspected by the County ECC. The basins have two stage outlet control features consisting of outlet orifices and dual water and oil weir systems to prevent oil from reaching the storm drain system. The *PXP Retention Basin Study*, completed in March 2009 and revised in September 2009 and January 2010, analyzed and modeled the capacities of the basins along with a 100 year storm event. The study concluded that the onsite basins have the capability to handle a 100 year storm event without flooding per the CSD requirement. The study further determined that in the event of an oil tank failure during a 100 year storm event, the basin weir system would prevent oil from going offsite. The County Public Works Department has reviewed and approved the retention basin capacities.



Vickers Basin

The 2012 EQAP audit report discusses a release of 90 barrels of produced water that occurred on February 25, 2012. The cause of the release was a corroded six inch trunk pipeline and the produced water flowed across the facility and into the storm water basin system. Several barrels of water flowed off site along the Stocker Street curb before returning back on site and back into the storm water drain system where it was contained in a storm water basin. The Stocker Street storm water curb also directs storm water from offsite into the facility storm water system. The corroded pipeline was connected to a well that was shut in and it was removed from service. Review of the incident during the audit process indicated the system worked as designed by directing the released water into the storm water system and capturing it in a basin.

Most of the above ground piping throughout the oil field is not protected by individual pipeline specific secondary containment or basin structures; however, the oil field

retention basin system prevents any fluid from the above ground piping from traveling offsite.

The mitigations for safety and risk of upset required by this provision have been implemented and are considered to be fully effective at this time, no further analysis is recommended.

**New Technology:**

Blending of NGLs with oil is standard industry best practice and the transportation of NGL by pipeline significantly reduces the risk to public safety when compared to other modes of transportation such as truck or rail.

As noted above, the propane and natural gas liquids bullets are subject to regulatory agency codes and requirements, therefore, new or modified equipment will be updated as required by future changes to those codes and requirements. New technologies associated with the operation of a steam drive plant will be reviewed by the DRP, SCAQMD, and other interested agencies during review of a project application should a new plant be proposed.

The facility oil tank secondary containment and retention basin systems are sufficient to handle a worst case oil spill along with a 100 year storm event. As applicable plans such as the ERP and SPCCP are periodically updated and through the annual EQAP audit process, new technologies for the prevention and control of potential leaks or spills are reviewed and can be implemented as applicable, without the need to modify the CSD.

**Recommendations to Changes in Implementation:**

The requirements for safety and risk of upset to minimize risk of accidents and the release of hazardous materials of this provision have been implemented, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The provision is considered to be fully effective at this time and no changes to the CSD language are recommended.

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***E.4 Geotechnical. The operator shall comply with the following provisions:***

***a. Grading. The operator shall comply with all of the following provisions:***

*i. All proposed grading shall be subject to prior review and approval by the director of public works.*

*ii. Grading involving up to 5,000 cubic yards and grading associated with the bioremediation farms may be undertaken pursuant to a county master grading Plan stamped by a registered professional engineer and a California certified engineering geologist and approved by the director of public works.*

*iii. No slope of cut or fill shall have a gradient steeper than two to one (2:1) unless specifically approved by a site specific geotechnical report.*

*iv. Cuts and fills shall be minimized to avoid erosion and visual impacts.*

*b. Geotechnical Investigations. The operator shall comply with the following provisions:*

*i. A site-specific geotechnical investigation shall be completed for grading in excess of 5,000 cubic yards, unless associated with the on-site Bioremediation Farms and approved pursuant to a master grading Plan approved by the director of public works, and for any grading that supports or impacts a critical facility as determined by the director. The investigation shall be completed by a California certified engineering geologist and submitted to the director and the director of public works for review and approval, in conjunction with an application for a revised grading permit.*

*ii. A site-specific geotechnical investigation shall be completed for all proposed permanent structures. The investigation shall include analysis and recommendations associated with potential seismically induced ground failure, such as differential settlement and lateral spreading. The geotechnical investigation shall be completed by a California-certified engineering geologist and submitted to the director of public works for review and approval.*

*c. Erosion Control. The operator shall comply with the following provisions:*

*i. The operator shall comply with all provisions of an erosion control Plan that has been approved by the director. The erosion control Plan shall be reviewed by the operator every two years to determine if modifications to the Plan are required. Any modifications to the erosion control Plan shall be submitted to the director for review and approval. The erosion control Plan shall include any measures requested by the director.*

*ii. Erosion shall be controlled on all slopes and banks so that no mud or other substances are washed onto public streets or surrounding property. Such control measures may consist of planting and irrigation, dams, cribbing, riprap, sand bagging, netting, berms, or other devices.*

*d. Restoration of Slopes. Slopes shall be restored to their original grade once the use that required the grading of the slope has been discontinued. However, if restoration of a slope would negatively affect existing drainage patterns or slope stability, then the slope shall be restored to a grade that avoids these negative effects.*

*e. Ground Movement Surveys. The operator shall conduct ground movement surveys once every 12 months, or more frequently if determined necessary by the director of public works, following all provisions of a ground movement monitoring Plan that is acceptable to DOGGR and the director of public works, that calls for both vertical and*



horizontal ground movement surveys, at specified survey locations within, and in the vicinity of, the oil field, utilizing high precision Global Positioning System technology, in combination with a network of ground stations (or any alternative technology specified in the ground movement monitoring Plan approved by the director of public works), and following other survey methods outlined in the Plan. The surveys shall be conducted by a California-licensed surveyor. The survey results shall be analyzed in relation to oil field activities, such as production, steam injection, and waterflooding, taking into consideration individual oil producing zones, injection schedules, rates, volume, and pressure. The analysis shall be completed in collaboration by a California-registered professional petroleum engineer, registered geotechnical engineer, and certified engineering geologist. The results of the annual monitoring survey and analysis shall be forwarded to DOGGR and the director of public works. If requested by DOGGR or the director of public works, the operator shall make modifications to the ground movement monitoring Plan. In the event that survey indicates that on-going ground movement, equal to or greater than 0.6 inches at any given location, or a lesser value determined by the director of public works is occurring in an upward or downward direction in the vicinity of or in the oil field, the operator shall review and analyze all claims or complaints of subsidence damage that have been submitted to the operator or the county by the public or a public entity in the 12 months since the last ground movement survey. Based thereon, the operator shall prepare a report that assesses whether any of the alleged subsidence damage was caused by oil operations and submit said report to DOGGR and the department of public works. The department of public works shall review the report to determine if it concurs with its conclusions. If the report concludes that damage has not been caused by oil operations, and the department of public works does not concur in that conclusion, it shall forward its conclusions to DOGGR for its review and possible action. If the report concludes that damage was caused by oil operations and the department of public works concurs with any such conclusion, the department of public works shall forward the department of public works' conclusions to DOGGR and ask DOGGR to evaluate the operator's fluid injection and withdrawal rates to determine whether adjustments to these rates may alleviate the ground movement, and if so, where in the oil field such adjustments should be made. The operator shall implement whatever adjustments in the rates of fluid injection and/or withdrawal that DOGGR determines are necessary and appropriate to alleviate any ground movement damage. The county shall promptly notify the CAP of any such action that is taken pursuant to this subsection. Injection pressures associated with secondary recovery operations (i.e., water flooding) or disposal of produced fluids shall not exceed reservoir fracture pressures as specified in Title 14 of the California Code of Regulations, section 1724.10, and as approved by the DOGGR.

f. *Construction of Permanent Structures.* No permanent structures shall be constructed in an Alquist-Priolo Fault Zone without preparation of a fault study by a California-certified engineering geologist. Following the fault study, no permanent structures shall be placed within 50 feet of a known active fault. The fault investigation report shall be submitted to the director of public works for review and approval.

g. *Oil Field Accelerometer.* The operator shall operate and maintain an accelerometer at the oil field to determine site-specific ground accelerations as a result of any seismic



*event in the region (Los Angeles/Orange County and offshore waters of the Santa Monica Bay and San Pedro Channel). Readings from the accelerometer shall be recorded at the oil field and transmitted in real-time to the Caltech Seismological Laboratory. The operator shall cease operations and inspect all oil field pipelines, storage tanks, and other infrastructure following any seismic event that exceeds a ground acceleration at the oil field of 13 percent of gravity (0.13 g) and promptly notify the director. The operator shall not reinstitute operations at the oil field and associated pipelines until it can reasonably be determined that all oil field infrastructure is structurally sound.*

*h. Pipeline Management Plan. The operator shall maintain and implement a pipeline management Plan that meets the requirements of DOGGR regulations.*

*i. Paleontological Monitor. The operator shall have a qualified paleontologist, approved by the director, monitor all rough grading and other significant ground disturbing activities in paleontological sensitive sediments. The sensitive sediments that have been identified within the oil field include the Lower to Middle Pleistocene San Pedro Formation and the Middle to Upper Pleistocene Lakewood Formation. A paleontologist will not be required on site if excavation is only occurring in artificial fill or Holocene alluvium.*

**Summary of Complaints:**

One complaint on ground movement and 26 complaints on property damage have been received through December 2013. Two of the complaints were not associated with ground movement or oil field activities, with one described as a rock to a car window and one associated with oily soil in a residential garden plot. The remaining 22 complaints listed various types of property damage from cracks in walls, driveways, and swimming pools. As listed in the analysis section below, results of the annual ground movement survey required 18 investigations for property damage claims.

**Summary of Issues Raised by the Public:**

Members of the public have expressed frustration with the requirements of the provision of the CSD on ground movement claims. During various CAP meetings members of the public have expressed a desire to have a more direct mechanism by which their claims can be evaluated and, where appropriate, have the claims be resolved in a timely fashion.

The 2012 and 2013 ground movement survey reports recommended that one of the historical monuments utilized for the surveys (Monitor Station 50004, Historical Monument Inglewood E-1C) be discontinued due to problems with the station which may be affected by a tree root; the reports recommend that the station be moved or that another station be installed nearby. This situation has been discussed at Community Advisory Panel (CAP) meetings with comments concerned as to whether the movement of the survey point was due to the tree root or actual ground movement. Discussion at the October 2013 CAP meeting included a request by a CAP member that the existing station remains as data point and that an additional station be installed nearby.

Although this Periodic Review document does not include 2014 compliance activities, the subject survey marker was replaced in 2014, see discussion below.

**Analysis of Compliance and Effectiveness:**

All grading at the oil field has been reviewed and approved by the County Public Works Department by the annual submittal of a master grading Plan, submitted in October or November of each year. Grading associated with the operation of the bio farms is also included in the master grading Plan. The Plan is prepared by a registered professional engineer and a California certified engineering geologist. Approval of the master grading Plan by the County ensures no slopes have a gradient greater than two to one without a geotechnical report and that cut and fill is minimized to avoid erosion and visual impacts. The grading projects at the oil field to date have been 5,000 cubic yard or less, therefore, a site specific geotechnical investigation pursuant to Provision E.4.b.i has not been required. Geotechnical investigations have been completed for the installation of permanent structures at the oil field with the geotechnical reports submitted along with the County DRP site Plan and Building and Safety permit applications. Examples of permanent structures requiring this analysis include a 5,000 barrel tank at the Packard Tank Setting, a foundation for injection pump at the water plant, installation of two new water tanks, and a new “UltraFab” unit installed at the gas plant.

The *PXP 2009 Erosion Control Plan Inglewood Oil Field* was initially submitted on May 26, 2009, revised in October 2009 and approved by County Public Works in May 2010. The Plan describes the oil field site and the surrounding public streets and includes a discussion on typical erosion control strategies and the erosion control strategies used onsite at the oil field. Restoration of slopes at the oil field from grading activities has been completed consistent with the erosion control Plan and the master grading Plan. In addition to the Erosion Control Plan, the oil field Storm Water Pollution Prevention Plan (SWPPP) contains measures and management practices to control mud from washing onto public streets or surrounding properties. FM O&G utilizes an environmental consulting company with expertise in storm water management to assist them in the implementation of the provisions of the SWPPP.

Ground movement surveys have been completed annually as required pursuant to the *Accumulated Ground Movement Plan* approved by County Department of Public Works (DPW) on November 10, 2009 and DOGGR on November 30, 2009. The surveys are completed using Global Positioning (GPS), Geodetic Leveling, and DifSAR processes and procedures as documented in the Ground Movement Monitoring Plan as approved by DPW and DOGGR. Baseline survey reports were submitted in January 2011 with revisions in March and October 2012. Annual survey reports were submitted July 2012 with revisions in October 2012, September 2013, and October 2014 to DOGGR and the DPW as required, the reports are available on the Inglewood Oil Field web site at <http://www.inglewoodoilfield.com>.

Potential interference from tree roots or other issues with several survey marker (monument) locations was addressed in the 2014 Annual Ground Movement Survey documentation. As a result, twelve survey markers were added in 2014 including

monument number 50004 which was recommended at a CAP meeting for replacement. The new survey monuments were surveyed during the 2014 survey for baseline measurements; the original twelve were left in place and will continue to be included in the future ground movement surveys. The replacement monuments are summarized in the following table.

<b>Monument Number</b>	<b>Replacement Number</b>	<b>Reason for Replacement</b>
102	301	Possible expansive soil.
111	309	Possible slope creep and disturbance from road maintenance work.
112	310	Possible slope creep and disturbance from road maintenance work.
116	304	Possible slope creep and disturbance from road maintenance work.
120	311	Possible slope creep and slope erosion.
121	312	Possible fill settlement, slope creep, and disturbance from oil field activities.
132	305	Movement due to tree roots and future repairs to sidewalks and curb.
50000	308	Possible expansive soil.
50002	307	Possible expansive soil.
50003	302	Possible expansive soil and disturbance from oil field activities.
50004	303	Possible slope creep, expansive solids, and tree root interference.
50010	306	Possible expansive soil and disturbance from power line maintenance activities.

Results of the ground movement surveys for 2011 and 2012 have indicated subsidence equal or greater than 0.6 inches which triggers the requirement to investigate complaints of subsidence damage from the public. In 2011, 17 damage claims were investigated and 3 claims were followed up on in 2012. Reports were prepared on the subsidence claims and submitted to County Public Works for review; none of the reports concluded that the reported damage was caused by the oil field. One claim, in the Windsor Hills School area and originally initiated in July 2012, continues to be investigated. The July 2012 complaint was followed up with the required geotechnical investigation and reviewed by Public Works. Public Works, in a letter dated September 25, 2012, requested additional data from the oil field operator (PXP at the time) to assist in review of potential causes of the subsidence in the Windsor School area. PXP provided additional information to Public Works on November 9, 2012 and the data was forwarded to DOGGR for review. DOGGR staff concluded that, due to the complex geology and subsidence history of the area, additional ground movement survey data is required to make a determination on the oil field operations potential impact to ground movement in the Windsor Hills School area.

As suggested in the various reports and as concurred by Public Works and DOGGR Geologists, the areas used for construction of residences surrounding the oil field consists mostly of construction in areas with substantial slopes on unconsolidated, unstable material that was not properly compacted at the time of construction. In addition, construction of residences preceded modern building codes and residences were not built to today's more stringent construction standards, potentially accounting for some of the cracking of structures. Finally, the areas surrounding the oil field are all within a seismically active location. The combination of all these factors is more likely to contribute to ground movement and potential property damage than the operations at the oil field. DOGGR continues to monitor closely the withdrawal and reinjection of fluids into the reservoirs to prevent ground movement from occurring as a result of the oil field operations.

The *Annual Well Increase Evaluation, December 2011*, included a discussion of the ground movement issue and associated surveys. The report reviewed the survey results and concluded that although additional monitoring data is required for a final determination regarding ground movement impacts from the oil field, the provisions of the CSD are keeping ground movement to a level that is considered protective of the safety, health, and general welfare of the public.

No permanent structures have been constructed in an Alquist-Priolo Fault Zone since the adoption of the CSD, therefore, the preparation of a fault study required by subsection E.4.f has not been required to date. The office, warehouse, and associated buildings are built within the fault zone overlay; however, construction of these structures pre dates the CSD requirement.

The oil field accelerometer seismic station was installed and began collecting data on May 20, 2009. The data is transmitted in real time by cell link to the CalTech Seismological Laboratory where the data is recorded and stored. The accelerometer has not measured ground acceleration in excess of the 13 percent of gravity (0.13 g) criteria of this provision to date, thus the oil field has not been required to shut in due to a ground acceleration event.

The pipeline management Plan required by subsection E.4.h was submitted to DOGGR as required in December 2009, it has not been necessary to update the Plan to date. Three projects have triggered the paleontological requirements of subsection E.4.i; work associated with wells TVIC-4311, TVIC-3263 and TVIC-181. These three wells are located within the identified paleontological geologic sensitive units (the San Pedro or Inglewood formations). The surveys were performed by an environmental consulting firm with a County approved Registered Geologist with expertise in paleontology. Results of the surveys for the three wells did not indicate any items of potential paleontological interest.

The provision is considered to be fully effective at this time and no further analysis is recommended.

**New Technology:**

The scientific equipment used for the technical studies required pursuant to this provision is considered to be state of the art. No recommendations for new technology are recommended at this time.

**Recommendations to Changes in Implementation:**

No recommendations for new technology are recommended at this time.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

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***E.5 Noise Attenuation.*** All oil operations on the oil field shall be conducted in a manner that minimizes noise and shall comply with the following provisions:

a. *Noise Limits.* The operator shall comply with the following provisions:

i. All oil operations on the oil field shall comply with the noise provisions of Chapter 12.08 of Title 12 of the County Code, with the exception of drilling, redrilling, and reworking, which are exempt from the provisions of said chapter.

ii. Hourly, A-weighted equivalent noise levels associated with drilling, redrilling, and reworking shall not elevate existing baseline levels by more than five dBA at any developed area. For daytime activities (7:00 a.m. to 7:00 p.m.) existing baseline noise levels shall be defined as the maximum daytime equivalent noise level (Leq) at the closest monitoring site as shown in Table 4.9.3 of the 2008 Baldwin Hills Community Standards District Environmental Impact Report. For nighttime activities (7:00 p.m. to 7:00 a.m.), existing baseline noise levels shall be defined as the minimum nighttime equivalent noise level (Leq) at the closest monitoring site as shown in Table 4.9.3 of the 2008 Baldwin Hills Community Standards District Environmental Impact Report. Updated baseline noise levels may be set and additional monitoring sites may be established, from time to time by the director. In no case shall baseline noise levels include any drilling, redrilling, or reworking operations.

iii. Noise produced by oil operations shall include no pure tones when measured at a developed area.

b. *Backup Alarms.* Backup alarms on all vehicles operating within the oil field shall be disabled between the hours of 8:00 p.m. and 8:00 a.m. During periods when the backup alarms are disabled, the operator shall employ alternate, low-noise methods for ensuring worker safety during vehicle backup, such as the use of spotters.

c. *Quiet Mode Drilling Plan.* All drilling and redrilling on the oil field between the hours of 6:00 p.m. and 8:00 a.m. shall be conducted in conformity with a quiet mode drilling Plan that has been approved by the director and the director of public health. The quiet mode drilling Plan shall be reviewed by the operator every year to determine if

*modifications to the Plan are required. The operator shall make changes to the Plan if requested by the director or the director of public health. Any modifications to the quiet mode drilling Plan shall be submitted to the director and the director of public health for review and approval. The quiet mode drilling Plan shall include any measures requested by the director or the director of public health.*

*d. Equipment Servicing. All noise producing oil field equipment shall be regularly serviced and repaired to minimize increases in pure tones and other noise output over time. The operator shall maintain an equipment service log for all noise-producing equipment.*

*e. Deliveries to the Oil Field. Deliveries to the oil field shall not be permitted after 8:00 p.m. and before 7:00 a.m. except in cases of emergency. Deliveries on Sundays or legal holidays shall not be permitted after 8:00 p.m. or before 9:00 a.m., except in cases of emergency.*

*f. Deliveries within the Oil Field. Deliveries to areas of the oil field located within 500 feet of any residential property shall not be permitted after 5:00 p.m. or before 7:00 a.m. except in cases of emergency. Deliveries to such areas on Sundays or legal holidays shall not be permitted after 5:00 p.m. and before 9:00 a.m., except in cases of emergency.*

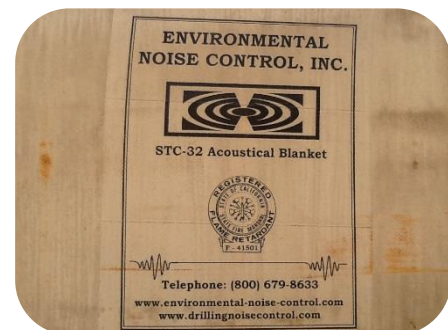
*g. Time Limits for Construction. Construction of permanent structures shall not be permitted after 7:00 p.m. and before 7:00 a.m., or during Saturdays, Sundays, or legal holidays.*

*h. Construction Equipment. All construction equipment shall be selected for low-noise output. All construction equipment powered by internal combustion engines shall be properly muffled and maintained.*

*i. Construction Equipment Idling. Unnecessary idling of construction equipment internal combustion engines is prohibited.*

*j. Worker Notification. The operator shall instruct employees and subcontractors about the noise provisions of this subsection E.5 prior to commencement of each and every drilling, redrilling, reworking, and construction operation, and shall annually certify to the director that such employees and subcontractors have been properly trained to comply with such noise provisions. The operator shall prominently post quiet mode policies at every drilling and redrilling site.*

**Summary of Complaints:** Fifty complaints from January 2009 through December 2013 have been logged regarding noise from the oil field with the majority of the complaints not identified with a specific noise source either from the oil field or from other potential area noise sources. For noise that was identified with a source from the oil field, maintenance



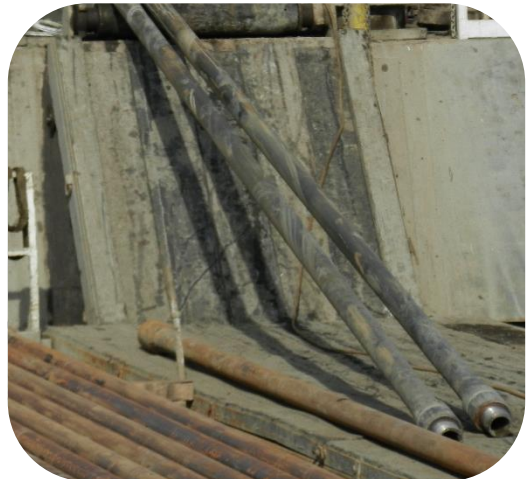
Acoustical Noise Blanket

rigs, work over rigs, and the sound of pipe banging was found to be the primary cause of noise.

The report prepared by the County in response to the request by PXP in October 2011 to increase the annual number of wells allowable for drilling or redrilling, the *Annual Well Increase Evaluation, December 2011*, includes analysis on the implementation of the noise provisions of the CSD through August, 2011. The report detailed the noise complaints between January 2009 and the end of the third quarter of 2011 where 22 noise complaints had been logged and investigated. Eleven of the complaints were determined to come from other sources not related to oil field operations, four were identified to be potentially associated with the oil field and seven could not be confirmed as to the source. Noise monitoring data for the four complaints associated with the oil field indicated the noise did not exceed the noise limits of the CSD.

**Summary of Issues Raised by the Public:**

Noise from the oil field was discussed in detail at the Community Advisory Panel (CAP) meeting on October 25, 2012 where staff from the Public Health Department made a presentation on the noise monitoring activities conducted by the County. The Public Health Department performs sampling at various locations within the surrounding communities at random dates and times of day. The presentation concluded that the dominant source of noise in the area of the oil field is traffic for both daytime and nighttime periods. Input from the public at the meeting included requests for more monitoring, more monitoring locations, monitor locations closer to residences, and discussions of specific noise complaints such as banging of pipes.



Drill Rig Rubber Mats – Pipe Rack Area

Input on potential noise from the oil field was also received by the County in comments solicited for the Periodic Review. The comments were raised at the CAP meeting on May 23, 2013. Members of the public identified oil field noise as coming from banging, unloading of trucks, jackhammers, low decibel underground drilling noises, some type of alarm noise in early morning hours and constant rumblings after 10pm. The public also noted a lack of noise barriers at work over drill rig sites.

Oil field noise was a discussion issue of the Settlement Agreement dated July 15, 2011 negotiated between concerned public parties, the County and PXP (now FM O&G). The agreement revised the CSD with regards to allowable nighttime maximum noise levels at baseline



Noise Monitor

monitoring locations. The agreement lowered the nighttime (10pm to 7am) maximum noise level above the baseline value from the 5 dBA referenced in this provision to 3 dBA for drilling, redrilling, and reworking activities. The agreement also stipulated that if those operations elevate nighttime baseline noise levels by more than 10dBA for more than 15 minutes in any one hour, the source of the noise must be identified and steps implemented to avoid such a noise elevation in the future. Development of the baseline noise levels and compliance criteria is discussed below.

**Analysis of Compliance and Effectiveness:**

Noise measurements were taken at seven sites around the perimeter of the oil field to assist in the preparation of the noise analysis section of the *Final Environmental Impact Report, Baldwin Hills Community Standards District, October 2008 (FEIR)*. The FEIR was prepared as part of the environmental documentation used to develop the CSD. The seven monitoring sites were selected to represent the closest residential, recreational and educational uses to the oil field and included locations in Ladera Heights, Windsor Hills, Culver Crest, Kenneth Hahn State Recreation Area, and West Los Angeles College. The results of the noise monitoring were used to set baseline values for the noise limit criteria of section E.5.a.ii of this provision.

The revised baseline monitoring locations were developed by a team of noise experts from the County Health Department, County DRP, the County ECC, and noise consultants assisting the County. PXP, the operator at the time, also provided noise expert consultants to assist with the determination of the baseline monitoring site selection. Six new monitoring sites were selected (the Settlement Agreement incorrectly references 11 monitoring locations) and monitoring occurred for 72 hours to generate the revised baseline data. The baseline monitoring data reports are available at the oil field web site at <http://www.inglewoodoilfield.com>.

Provision E.5.a.ii requires that noise levels from the operation of the oil field drilling, redrilling, and reworking shall not elevate existing baseline levels by more than five dBA at any developed area. As noted above, this requirement was revised to a maximum of three dBA from 10pm to 7am by the Settlement Agreement for nighttime operations. Prior to the commencement of drilling, redrilling or reworking operations, noise monitoring equipment is set up at one of the six baseline monitoring stations and monitoring occurs 24 hours a day until the well work activity is completed. The monitoring location is selected by a noise expert consulting for FM O&G during an onsite visit; this review also includes direction to the operator in sound wall installation locations.

There have been instances where noise levels above the maximum criteria have been recorded during monitoring events for drilling, redrilling or well reworking activities. These events are investigated and analyzed by the County noise expert to determine the cause of the elevated noise levels. Results of the noise analyses for these events have determined the cause as emergency vehicles, motorcycles, airplanes, and noise generated from various types of portable equipment used in landscaping. Noise levels above the maximum allowable criteria from drill site monitoring have not been associated with the oil field to date.



Noise monitoring for oil field compliance is also done by the County Public Health Department. As discussed above, this monitoring is done at sampling points, dates, and times of day selected at random in locations within the surrounding communities. Public Health has not documented any violation of the CSD or Chapter 12.08 of Title 12 of the County Code. For example, noise monitoring was completed by Public Health 40 times in 2011 between March 26, 2011 and November 29, 2011 during both day and night hours with 60 minute sampling durations. The 2011 monitoring effort resulted in nine results exceeding the maximum allowable criteria with the source of all nine measurements identified as vehicle or aircraft noise.

The *Annual Well Increase Evaluation, December 2011*, included a discussion of the effectiveness of the CSD noise provisions. The report identified that some of the noise complaints may have been associated with operation of the pipe storage rack. In response to this finding, the storage rack was relocated to the center of the oil field east of the Vickers bioremediation farm. The new location is a greater distance from residential noise receptors. The report also concluded that none of the noise complaints were found to be related to drilling operations. This conclusion is also supported by review of the noise complaint log through December 2013. The report concluded that the CSD has been effective at keeping noise to a level that would be considered protective of the health and general welfare of the public.

The County Environmental Quality Assurance Program (EQAP) required by Provision F.1 includes requirements for noise monitoring. As part of the 2010 EQAP audit the County obtained a noise expert to conduct a review of the noise monitoring completed for the revised baseline data at monitoring stations 1 and 2. Monitoring stations 1 and 2 were selected for their proximity to residences in the surrounding community. The effort included review of the baseline monitoring reports, review of the monitoring reports during drilling activities, site visits to the oil field, and additional onsite noise monitoring. The report concluded that no noise exceedances have resulted from drilling, re-drilling, or reworking operations.

CSD Provision E.5.a.iii requires that noise produced by oil operations shall include no pure tones when measured at a developed area. Pure tone noise is noise in which a single frequency stands out, usually high pitched, and can be more noticeable than sources that do not contain pure tones. The County has not documented any issues with regard to pure tone noise to date.

The Quiet Mode Drilling Plan (QMDP) was first submitted in February 2009 and revised in April, July and September 2009. The Plan provides for quiet mode measures to reduce noise from drilling activities. Many of the measures are intended to reduce metal to metal contact activities known to increase noise around drilling operations. The QMDP also includes training of service personal and subcontractor staff and quiet mode signage posted at drilling sites listing the quiet mode drilling rules. The



Acoustical Blanket

training occurs twice each day prior to the start of each drilling shift. As noted above, no noise complaints have been associated with the drilling rig at the oil field to date. The drill rig is currently operating in quiet mode status 24 hours a day.

The County ECC checks drill rig operations for compliance with the QMDP during the regular EQAP site inspections and annual audits. Noise minimization measures observed during these inspections include sound blankets around the “monkey board” on the derrick tower, the installation of sound walls, the use of rubber mats on the rig “V” door, and the confirmation that daily briefings on the noise minimization measures of the QMDP have been conducted with drilling staff.

The QMDP also includes the other noise minimization measures required by this provision. Back-up alarms are not used during night time hours and deliveries to the oil field and within the oil field are restricted as required in provisions E.5.e and E.5.f. The delivery restrictions are posted at the main gates consistent with the requirements of Provision 13, *Signs*. FM O&G complies with the time limits for construction of permanent structures, no construction occurs after 7:00 p.m. and before 7:00 a.m., or during Saturdays, Sundays, or legal holidays.

Provisions E.5.d and E.5.h list requirements for construction equipment maintenance and operation. Equipment is serviced and is properly muffled pursuant to the manufacturer’s specifications. The 2012 Environmental Quality Assurance Program (EQAP) Audit Report recommended an improvement in the recordkeeping of the maintenance records of noise making equipment. The intent of the recommendation is to assist in the verification of compliance of this provision. Improved recordkeeping techniques will allow for the County to easier check the service record for all noise making equipment operated in the oil field.

Provision E.5.j lists the requirement for worker notification of the noise minimization measures listed by this condition. As noted above, for drilling operations, the QMDP measures are discussed at “tail gate” briefings prior to the start of each drilling shift. The unnecessary idling of construction equipment requirement of provision E.5.i is noted during the twice daily QMDP daily staff briefings. In addition, all employees and sub-contractors are trained to comply with these noise provisions each year during annual certification training.

As documented above, the noise provisions of the CSD have been implemented, are ongoing, and considered to be fully effective at this time, with no further analysis recommended.

**New Technology:**

The noise minimization measures required by this provision and as contained in the QMDP represent current best industry practice to limit noise from the operation of an oil field. In addition, this provision requires that *“oil operations on the oil field shall be conducted in a manner that minimizes noise...”*, thus new technologies in noise minimization methods can be implemented as applicable to oil field operations in the course of ongoing compliance monitoring without the need for amendments to the CSD.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No recommendations in the CSD language are recommended at this time.

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***E.6 Vibration Reduction.*** All oil operations on the oil field shall be conducted in a manner that minimizes vibration. Additionally, vibration levels from oil operations at the oil field shall not exceed a velocity of 0.25 mm/s over the frequency range 1 to 100 Hz at any developed area.

**Summary of Complaints:**

The County has received eleven complaints associated with vibration through December 2013. Three of the complaints were associated with the start-up of the “old” gas plant flare and four complaints were not able to be substantiated with a source at the oil field. The new gas plant flare was completed in 2012 and operation of the old flare is limited to a restricted gas throughput to minimize vibrations. No complaints regarding vibration have been noted from operation of the gas plant flares since the implementation of the gas throughput restriction on the older flare.

**Summary of Issues Raised by the Public:**

Public input on vibration was also received by the County in comments solicited for the Periodic Review. One letter from the public described a vibration that shook the resident’s house continuously for 15 to 30 minutes in January 2013. An additional comment was provided in the results of the electronic survey initiated for public input on the CSD. The survey respondent described two noticeable “quakes” that occurred sometime in April or May of 2013.

**Analysis of Compliance and Effectiveness:**

The *Final Environmental Impact Report, Baldwin Hills Community Standards District, October 2008 (FEIR)*, prepared as part of the documentation necessary to develop the CSD, analyzed potential vibration issues at the oil field. Section 4.9 of the FEIR, *Noise and Vibration*, includes vibration monitoring data for typical drilling activities at the oil field. Results of the drilling activity vibration monitoring indicated the measured vibration levels did not exceed the criteria specified by this provision. The vibration criteria were not exceeded even with some monitoring data points as close as 50 feet from the drilling rig. Based on these monitoring results, the FEIR concluded that vibration impacts from drilling would not be considered significant.



New Flare

Vibration from operation of the gas plant flare was also discussed in the FEIR. Large volumes of gas

were flared in 2007 and 2008 due to unplanned interruptions in the availability of the gas transmission lines operated by another company downstream from the oil field. Monitoring for vibration during these events was not possible due to the fact that the interruptions in gas line transmission service were unplanned and unpredictable. Review of these flaring events along with vibration concerns from the public during the same time frame indicated that operation of the gas plant flare likely caused significant vibration events when operated at the high gas throughput levels caused by the transmission line interruptions. As such, the FEIR recommended the installation of a new flare system for the gas plant that could be operated at the necessary gas throughput levels without causing vibration events that would exceed the 0.25 mm/s over the frequency range 1 to 100 Hz velocity criteria for significant vibrations. This recommendation was implemented by CSD Provision L.5.b and the installation of the flare was completed in 2012.

The report prepared by the County in response to the request by PXP in October 2011 to increase the annual number of wells allowable for drilling or redrilling, the *Annual Well Increase Evaluation, December 2011*, includes analysis on the implementation of the vibration provision of the CSD. The report concluded that the CSD requirements have been effective at keeping vibration to a level that is considered protective of the health and general welfare of the public. Section F.6 of the CSD, *Vibration Monitoring*, provides for the County Public Health Department to request vibration monitoring as deemed necessary in areas surrounding the oil field. Based on the compliance reports documented for the oil field and the minimal amount of public complaints on vibration since the flare issue was identified and resolved; additional vibration monitoring has not been deemed necessary to date.

Installation of the new gas plant flare has been completed and vibration issues associated with the operation of the oil field have not been significant. The condition is considered to be fully effective at this time, no further evaluation is recommended.

**New Technology:**

Installation of the new gas plant flare represents new technology that will minimize vibration at the oil field. No other new technologies for vibration minimization for oil field operations have been identified at this time.

**Recommendations to Changes in Implementation:**

This requirement has been implemented and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

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***E.7 Biological Resources.*** All oil operations on the oil field shall be conducted in a manner that minimizes impacts to biological resources and shall comply with the following provisions:

a. *Oil Spill Response.* The operator shall comply with all provisions of an Emergency Response Plan ("ERP") that has been approved by the director, to protect biological species and to revegetate any areas disturbed during an oil spill or clean-up activities. The operator shall make changes to the ERP if requested by the director. Any modifications to the ERP shall be submitted to the director for review and approval. The ERP shall include any measures to protect biological species that may be requested by the director.

b. *Special Status Species and Habitat Protection.* The operator shall comply with all provisions of a special status species and habitat protection Plan that has been approved by the director. The operator shall make changes to the Plan if requested by the director. Any modifications to the Plan shall be submitted to the director for review and approval. The special status species and habitat protection Plan shall include any measures requested by the director.

c. *Habitat Restoration and Revegetation Plan.* Prior to any disturbance of sensitive natural habitat areas, as identified in the special status species and habitat protection Plan, the operator shall hire a biologist, approved by the county, to conduct a survey of the area to determine if significant impact to sensitive natural habitat, including coastal sagebrush, coyote bush scrub, riparian scrub, and oak woodland will occur. If the biologist determines that significant impact to sensitive natural habitat will occur, then the operator shall have a county-approved restoration specialist, with expertise in southern California ecosystems and revegetation techniques, prepare a habitat restoration and revegetation Plan. The Plan shall be submitted to the director for review and approval. The director shall make best efforts to complete the review of the Plan as expeditiously as possible and shall then either approve the Plan or provide the operator with a list of specific items that must be included in the Plan prior to approval. No removal of sensitive natural habitat shall occur until the Plan has been approved by the director. The habitat restoration and revegetation Plan shall include any measures requested by the director.

d. *Pre-Construction Surveys.* The following surveys shall be conducted prior to any significant vegetation removal in sensitive natural habitat as identified in the special status species and habitat protection Plan.

i. The operator shall hire a county-approved ecologist/botanist to conduct sensitive plant surveys.

ii. The operator shall hire a county-approved biologist to conduct sensitive wildlife surveys in habitat areas that could support sensitive wildlife species.

iii. The operator shall hire a county-approved biologist to conduct breeding and nesting bird surveys if the construction activities would occur during the breeding season (February 1 to August 31 for raptors, and March 15 to September 15 for sensitive/common birds).

*iv. The operator shall hire a county-approved wetland delineator to delineate any wetlands that would be affected by construction.*

*e. Listed Plant or Wildlife Species. If federal- or State-listed plant or wildlife species are found, then the operator shall comply with all applicable United States Fish and Wildlife and California Department of Fish and Game rules and regulations.*

*f. Construction Monitoring. If the pre-construction surveys find sensitive plant, wildlife species, or nesting birds, a biological monitor hired by the operator, and approved by the County, shall be on site during construction to monitor the construction activities. The biological monitor shall be responsible for the following:*

*i. Establishing a 300-foot buffer around any active breeding bird nests.*

*ii. Assuring that vegetation removal does not harm sensitive wildlife species.*

*iii. Monitoring the construction area for sensitive wildlife species and relocating them to suitable habitat outside of the construction area.*

*iv. Ensuring that exclusionary fencing is installed around the construction area to prevent sensitive wildlife species from entering the construction area.*

*g. Tree and Riparian Scrub Removal. Removal of native or non-native trees and riparian scrub vegetation shall be scheduled, as possible, for removal outside the nesting season to avoid impacts to nesting birds. If avoidance of removal of trees or riparian scrub during the recommended periods is not possible, a county-approved biologist shall perform a survey to ensure that no nesting birds are present prior to removal. If for any reason a nest must be removed during the nesting season, the operator shall provide written documentation to the director demonstrating concurrence from the United States Fish and Wildlife Service and California Department of Fish and Game authorizing the nest relocation and a written report documenting the relocation efforts.*

*h. Habitat Restoration. Within 60 days of completion of construction activities that have significantly impacted sensitive natural habitat, the operator shall begin habitat restoration consistent with the approved native habitat restoration and revegetation Plan discussed in subsection E.7.c. Restoration priority shall be given to areas of degraded habitat connecting areas of higher quality habitat and where restoration would produce larger corridors to support the migration and movement of wildlife. The operator shall replace any significant loss of sensitive natural habitat at the following ratios:*

*i. 1:1 for each acre of coastal sagebrush or coyote bush scrub.*

*ii. 2:1 for each acre of riparian scrub or oak woodland.*

**Summary of Complaints:**

No complaints regarding the biological resources or the provisions for protection of biological resources have been received by the County.

**Summary of Issued Raised by the Public:**

No issues have been raised by the public on biological resources or the provisions for protection of biological resources.

**Analysis of Compliance and Effectiveness:**

The Emergency Response Plan (ERP), current version dated June 2013 was updated for specific response considerations for biological resources in March 2010. The ERP is submitted to the following agencies; California Division of Oil, Gas, Geothermal Resources (DOGGR), California Department of Fish and Wildlife Office of Spill Prevention and Response (OSPR), U.S. Environmental Protection Agency Region 9, California State Lands Commission Marine Facilities Division Planning Branch, and the U.S. Department of Transportation Office of Pipeline Safety. To date, the ERP has not been needed to be activated to protect biological resources at the oil field.

The *Special Status Species and Habitat Protection Plan* was first prepared in 2009 and was approved on November 15, 2010. The Plan was prepared by a County approved ecologist/biologist. Compliance with subsections E.7.b through E.7.h is documented annually since 2010. In 2011, 2012, and 2013 compliance documentation consisted of a *Special Status Species Compliance Report*. The report documents the status and activities for the subject year involving biological resources at the oil field and includes an appendix compliance matrix which details the construction and well activities, any impacts to biological resources and the associated surveys or compliance requirements conducted pursuant to this provision. Prior to the initiation of drilling activities for each year, FM O&G provides a County approved biologist with the forthcoming drilling schedule and associated compliance matrix for review. The biologist prepares a schedule for pre-construction biological surveys required by subsection E.7.d and the surveys are completed within one week of the initiation of construction activities or vegetation removal. Monitoring occurs if necessary and a final survey is conducted upon completion of construction activities to document final impacts. Biological surveys are submitted with each of the site Plan permit requests submitted to the county for each well proposed to be drilled.

The *Special Status Species Compliance Report* for 2011 lists that pre-construction nesting bird surveys were conducted for 13 drill sites between April and August 2011. None of the nesting bird surveys indicated an active nest within the 500 feet of the drill site or that additional pre-construction biological surveys were required. Two of the drill sites resulted in the removal of a total of 0.11 acres of coastal sage brush, therefore, the impact was not deemed significant because the cumulative area of disturbed area of sensitive habitat was less than one acre. As such, the habitat restoration requirements of subsection E.7.h were not implemented in 2011 and additional construction monitoring was not required.

The 2012 report documents that 11 drill sites and 8 work areas were identified for pre-construction nesting bird surveys and that the surveys were completed between February and July 2012. None of the nesting bird surveys indicated an active nest within the 500 feet of the drill site or required additional pre-construction biological surveys. Two of the 10 work areas resulted in the removal of 0.024 acres of coyote bush scrub bringing the total cumulative disturbed sensitive habitat to 0.134 acres since the adoption of the CSD. Restoration of sensitive habitat did not occur in 2012 because the cumulative total has not reached the one-acre trigger to date.

The *Special Status Species Compliance Report* for 2012 also discussed four additional biological surveys that were conducted outside the nesting bird season to determine potential impacts to biological resources. None were identified. On May 3, 2012 oil field staff contacted the County approved biologist to address the finding of a bird nest on a piece of new equipment. Exclusionary fencing was installed around the piece of equipment establishing a 100-foot buffer to protect the nest and the nest was monitored by the biologist. Monitoring continued on the nest for approximately three weeks where four house sparrow eggs hatched young; the nest was determined to be abandoned on June 12, 2012.

The 2013 report documents that 31 pre-construction nesting bird surveys were completed for 28 drill sites and three work locations. No active nests were found within 500 feet of construction activities. Two locations, well pad modification at BC 425 and LAI 6843, involved removal of sensitive vegetation. The table below provides a summary of impacts to sensitive habitat recorded through 2013.

<b>Summary of Impacts to Sensitive Vegetation Communities</b>					
<b>Year</b>	<b>Lease</b>	<b>Well ID or Description</b>	<b>Coastal Sagebrush Scrub (acre)</b>	<b>Coyote Bush Scrub (acre)</b>	<b>Willows (acre)</b>
2011	BC	6652	0.091		
2011	BC	6641	0.090		
2012	VIC1	Pole 6	0.079		
2012	LAI1	Packard Wash Tank		0.099	
2013	BC	425	0.023		
2013	LAI1	6843		0.052	
2013	Rubel	Pipes			0.011
2013	SR	Road Maintenance	0.035		
2013	SR	Pipelines	0.023		
2013	LAI1	Road Construction	0.124		
2013	BC	Pipelines	0.052		
2013	Cone	Pipelines			0.086
<b>Sub Totals</b>			<b>0.517</b>	<b>0.151</b>	<b>0.097</b>
<b>Total</b>			<b>0.765</b>		

As provided for in the table above, the cumulative amount of sensitive habitat disturbed has not reached the one-acre criterion to date and no habitat restoration activities have occurred at the oil field. A habitat restoration Plan will be prepared and submitted to the



County for review and approval when the impact to sensitive habitat reaches the one-acre trigger.

The provision is considered to be fully effective at this time noting that the habitat restoration requirements have not been triggered to date, no further analysis is recommended.

**New Technology:**

The ERP, special status species and habitat protection, and habitat restoration plans required by this provision are submitted and approved by regulatory agencies. As these plans are periodically updated and/or the CSD language allows flexibility for additional measures as required by the County, improvements in habitat protection and restoration can be required by the County without the need for amendments to the CSD and can be adopted as they arise. No improvements are deemed necessary at this time and none are proposed.

**Recommendations to Changes in Implementation:**

This requirement has been implemented and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

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***E.8 Cultural/Historic Resources.*** *The operator shall comply with all of the following provisions:*

*a. Cone Trust House. Oil operations shall not result in impacts to the Cone Trust House.*

*b. Archeological Training. The operator shall provide archeological training for all construction personnel who will be involved with ground disturbance activities at the oil field. All such construction personnel shall be required to participate in the training and will receive training material prepared by a qualified archaeologist prior to working on ground disturbance activities.*

*c. Construction Treatment Plan. The operator shall comply with all provisions of a construction treatment Plan, approved by the director, to ensure that any new archeological discoveries are adequately recorded, evaluated, and, if significant, mitigated. In the event that unknown archaeological artifacts are encountered during grading, clearing, grubbing, and/or other construction activities, work shall be stopped immediately in the vicinity of the find and the resource shall be evaluated by a qualified archaeologist, approved by the director. The construction treatment Plan shall include any measures requested by the director.*

**Summary of Complaints:**

No complaints on cultural or historic resources have been received from the public. The oil field is private property and is not open to the public. The Cone Trust House is occasionally used by the movie industry and the operator has been contacted at least once regarding drilling noise during filming activities. In response to the noise inquiry, the operator modified the drilling activity schedule to accommodate completion of the filming activities.

**Summary of Issues Raised by the Public:**

There have been no issues raised by the public regarding the cultural or historic resources at the oil field with the exception of the movie industry coordinating with the operator during filming activities at the Cone Trust House. A representative from the Cone Fee Family Trust sits on the Community Advisory Panel (CAP).

**Analysis of Compliance and Effectiveness:**

The Cone Trust House and surrounding area are off limits to oil field staff to prevent any impacts to the historic building. A discussion of the significance of the Cone Trust House is included in the cultural resources sensitivity training of the oil field archaeological training program. The archeological training program, as required by CSD Provision E.8.b, was initially conducted on May 26, 2009. This training program is repeated annually along with the other employee awareness training requirements of the CSD.

The *Construction Treatment Plan* was initially submitted in May 2009, revised in July 2010, and was formally approved on January 24, 2011. The Plan includes a cultural history of the oil field site, an overview of cultural resource artifacts, the presence of cultural resources at the oil field, a discussion of the Cone Trust House, and a section on cultural resources sensitivity training. The Plan also includes the Inadvertent Cultural Resource Discovery and Impact Form, Cultural Resource Training Materials, and an Inadvertent Cultural Resource Discovery Communication Chart. The Plan is available on the FM O&G web site at <http://www.inglewoodoilfield.com>.

To date, one incident has required the implementation of the Inadvertent Cultural Resource Discovery procedure. On November 9, 2010 during the preparation of the well pad for Well BC-6532, two headstones were unearthed. The protocols of the *Construction Treatment Plan* were followed and the Inadvertent Cultural Resource Discovery and Impact Form was completed. The County Coroner was contacted; however, no human remains were discovered. The headstones were not deemed to be significant and the operator was given clearance to continue the project.

The condition is considered to be fully effective at this time and no further evaluation is recommended.

**New Technology:**

The annual cultural sensitivity and archaeological training required under Provision E.8.b allows for the introduction and implementation of new technologies in cultural resource protection as they become available and applicable to the oil field. However,

no improvements are identified at this time. If in the future improvements are deemed merited, they can be adopted as part of compliance review without the need for a Periodic Review.

**Recommendations to Changes in Implementation:**

This requirement has been implemented and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

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***E.9 Lighting.*** *Outdoor lighting shall be restricted to only those lights which are required by code for the lighting of building exteriors, drilling, and redrilling rigs and for safety and security needs. In addition, the operator shall comply with the following provisions:*

*a. Screening. All new point lighting sources within the oil field shall be screened and directed to confine direct rays to the oil field and to prevent offsite spillover lighting effects to the extent feasible.*

*b. Lighting Plan. A detailed lighting Plan shall be prepared for each new permanent structure and submitted to the director for review and approval. No work may be commenced on such permanent structure until the lighting Plan therefore has been approved by the director. The lighting Plan shall include any measures requested by the director.*

**Summary of Complaints:**

Two complaints regarding lighting has been documented through December 2013. One complaint was received by the facility 1 800 number at 2053 hours on May 8, 2013 from a Ladera Crest resident regarding bright lights in the northern part of the oil field. The complaint was investigated per the requirements of CSD Provision F.7, *Complaints*. The cause of the light was determined to be a member of the public using filming equipment approximately one mile north of the resident that called in the complaint. The member of the public conducting the filming activities was notified of the complaint issue.

The second complaint was discussed during a CAP meeting and involved a discussion of light from oil field operations impacting an adjacent home. As a result of this input from the public, the lighting and light shielding on the oil field rigs was adjusted to focus the lighting downward to minimize potential offsite light impacts.

**Summary of Issues Raised by the Public:**

The County has not received any concerns regarding the lighting at the Inglewood Oil Field except for the complaint discussed above which was not associated with the oil field activities.

**Analysis of Compliance and Effectiveness:**

Lighting at the oil field is primarily associated with the gas plant and tank farm facilities. Additional lighting is used with drill rig equipment as those operations occur 24 hours a day; office and outbuilding security lighting, and with limited vehicle traffic. The gas plant and the tank farms require lighting for operational and safety reasons. The lighting fixtures are screened to orient the light downward toward the area requiring illumination as feasible. Other lighting, such as security lighting at the office building, uses hood type screening fixtures to focus the light downward. Shortly after the CSD was implemented in November 2008, an assessment of all oil field lighting was completed to confirm compliance with the CSD lighting provisions and to confirm that there were no offsite lighting impacts.

Lighting for drilling rig operations at the oil field has been minimized to the maximum extent feasible given the operational and safety requirements necessary. Lights are focused downward from the monkey board of the drilling derrick as opposed to ground based flood lighting orientated upwards. A specific nighttime inspection by the County ECC on January 25, 2012 confirmed drill rig lighting was limited and focused downward towards the rig floor and adjacent work areas. Other night time site visits with spot checks on lighting have yielded similar results. Other rig operations at the oil field such as well reworking rigs are limited to day time operations from 7:00 am to 7:00 pm as required by CSD Provision E.28.c. With the exception of drill rigs which are required and permitted to operate 24 hours a day, FM O&G operations policy for all other rig operations in the oil field is to limit work activities to day light hours only and to avoid using lighting whenever possible. When operational or safety issues require working past sundown, as may occur during the winter time, portable lights are brought in to complete the necessary work. These portable lights are shielded and focused downward toward the work area and work is halted by 7:00 pm as required by the CSD.

No new permanent structures requiring a lighting Plan have been proposed by FM O&G, therefore, CSD provision E.9.b has not been activated to date.

Lighting at the oil field meets the criteria outlined in CSD Provision E.9. Lighting has not been an issue with the public except for a single complaint regarding lighting not associated with the facility operations. The provision is considered to be fully effective at this time and no further analysis is recommended.

**New Technology:**

New permanent structures at the oil field are subject to CSD Provision E.9.b which requires a lighting Plan approved by the County. As such, as new technologies in lighting become available, the County can require implementation of those technologies through the lighting Plan review and approval process for any new permanent structure.

**Recommendations to Changes in Implementation:**

The lighting at the oil field is consistent with the CSD requirements for lighting and thus the provision has been implemented; no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The lighting at the oil field is in compliance with the CSD requirement and there have been no complaints or public issues from oil field lighting to date. Therefore, no changes in the CSD language are recommended.

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***E.10 Landscaping, Visual Screening, Irrigation and Maintenance.*** *The operator shall comply with the conceptual landscaping Plan for the oil field prepared by Mia Lehrer & Associates, dated October 2008, on file at the department of regional planning, which is intended to beautify and screen the oil field from adjoining residential, recreational, and institutional areas or adjacent public streets or highways. Landscaping required by this Plan shall be completed in phases over a two-to five-year period as approved by the director. All landscaping on the oil field shall be routinely inspected (on at least a monthly basis) and maintained in a neat, clean, and healthful condition, including proper watering, pruning, weeding, fertilizing, and replacement of plants as needed. Litter shall also be removed on a regular basis.*

**Summary of Complaints:**

One complaint, on February 9, 2012, was raised regarding a visual impact from the oil field. The complaint listed the issue as a blimp flying over the oil field. The blimp was part of the compliance effort for this provision because it was used to carry camera equipment to document the progress of the landscaping.

**Summary of Issues Raised by the Public:**

Input on the aesthetics of the oil field relative to vegetation and landscape screening was received by the County in comments solicited for the Periodic Review. Results of the electronic survey on the Periodic Review listed complaints that the oil field is an “eye sore”, that the landscaping is not sufficient, and that oil field equipment is unsightly. One letter commented that the landscaping should use climate specific plantings and that the landscaping along oil field areas should be improved. A second letter requested that the landscaping along College Street and as viewed from the West LA College be improved and utilize native plants.

Issues regarding the aesthetics of the oil field were also noted at the May 13, 2012 CAP meeting during discussion of comments on the Periodic Review. Rusting pipes, areas with reduced vegetation, a lack of landscaping facing west, and the fact that the oil field is not adequately screened from the Culver City view shed were discussed. A dead tree was also noted at the meeting, located along Fairfax Avenue; however, the tree in question was later determined to not be located on oil field property.



Phase II Landscaping

Input on the landscaping effort was also received as part of the Settlement Agreement dated July 15, 2011 negotiated between concerned public parties, the County and PXP

(now FM O&G). The agreement requires FM O&G to prepare and implement a series of landscaping plans that enhance the *Mia Lehrer Landscape Improvements Concept Plan* referenced by this provision. The agreement further requires the landscape plans be submitted to the Community Advisory Panel (CAP) for review, and to install the first two phases of landscaping within 9 months of County final approval of the plans. Finally, the agreement requires all landscaping be completed within three years of approval by the County of the final phase Plan.

**Analysis of Compliance and Effectiveness:**

The *Landscaping Plan Inglewood Oil Field* was first submitted in May 2009 and was revised in November 2010. This base Plan outlines seven phases of landscaping effort, prioritized by concerns for screening areas of public corridors and water conservation considerations with subsequent plans prepared for each landscaping phase. Landscaping for Phase 1 and 2 has been completed for areas at the Ladera Crest residential view shed looking north and along the Windsor Hills/La Brea traffic corridor view shed, respectively. Phase 3 outlines plans for the Ladera Crest residential view shed looking east. Phases 4 and 5 involve a roadway buffer along La Cienaga Boulevard. The plans for Phases 3, 4, and 5 have been approved by the County, Phase 5 was completed in November 2014. Phase 6, a landscape buffer for the Fairfax Avenue roadway was submitted to Public Works in December 2014 and Phase 7, a landscaping buffer for Stocker Street have been prepared in draft form and is posted on the oil field web site, <http://www.inglewoodoilfield.com> for review by the CAP. Landscaping progress at Phases 1 and 2 has been periodically reviewed by the County ECC during site inspections.

The report prepared by the County in response to the request by PXP in October 2011 to increase the annual number of wells allowable for drilling or redrilling, the *Annual Well Increase Evaluation, December 2011*, includes analysis on the implementation of the visual and aesthetics provisions of the CSD. The report documents that the landscaping installation has begun and that additional landscaping will be phased in to improve the overall visual and aesthetics of the area around the oil field.



Landscaping

This provision is considered to be fully effective at this time, no further analysis is recommended.

However, the provision requires that the landscaping be installed over a two to five year period as approved by the County. The Settlement Agreement requires that landscaping be completed three years after County approval of the final phase landscaping Plan. Thus, the Settlement Agreement language appears to allow for an implied time extension from the original provision language by not listing a required date for submittal of the final landscape plans. It is recommended that FM O&G schedule installation of remaining landscaping phases to achieve the landscaping required by this provision in a timely manner.

**New Technology:**

Water saving drip irrigation is used where feasible; use of recycled water has not been implemented to date because it is not available to the oil field at this time.

**Recommendations to Changes in Implementation:**

As noted above, it is recommended that the remaining landscaping be completed to better meet the schedule requirements for landscaping of the original CSD provision.

**Recommendations to Changes in CSD Language:**

This provision has been implemented and was augmented by the Settlement Agreement and no changes in the CSD language are recommended.

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***E.11 Oil Field Waste Removal. The operator shall comply with the following provisions:***

*a. Waste Collection. All drilling, re-drilling, and reworking waste shall be collected in portable steel bins compliant with United States Department of Transportation standards. Any drilling, re-drilling, and reworking wastes that are not intended to be injected into a Class II Well, as permitted by DOGGR, shall be removed from the oil field no later than 30 days following completion of the drilling, re-drilling, and reworking. This provision does not apply to active sumps and mud pits.*

*b. Waste Discharge. No oil field waste shall be discharged into any sewer, storm drain, irrigation systems, stream or creek, street, highway, or drainage canal. Nor shall any such wastes be discharged on the ground provided that the foregoing shall not prohibit the proper use of active drilling sumps and mud pits.*

*c. Recycling Plan. The operator shall comply with all provisions of a recycling Plan that has been approved by the director. The recycling Plan shall include any elements requested by the director.*

**Summary of Complaints:**

No complaints associated with waste removal at the Inglewood Oil Field have been received by the County.

**Summary of Issues Raised by the Public:**

The County received one comment from the public on the CSD Periodic Review regarding oil field waste. The comment stated that the CSD requirements for drilling wastes and their disposal are not being followed by the operator; however, the comment did not specify what was not being done pursuant to the requirement.



Waste De-Water Bin

**Analysis of Compliance and Effectiveness:**

Waste generated by drilling, re-drilling, and reworking activities is collected in bins and emptied with the use of a vacuum truck as necessary. FM O&G does not use sumps or mud pits (see





Drill Mud Bin

discussion for CSD Provision E.15), and all such waste is contained in metal or plastic bins. The waste is transported to a processing facility on site operated by a sub-contractor. This facility, located east of the Edison yard, dehydrates the drilling mud and waste prior to transport to an approved offsite disposal location. All waste from drilling, re-drilling, and reworking sites is removed within 30 days of the completion of the activity. Inspection of drilling, re-drilling, and reworking is part of the periodic inspections completed by the County ECC as required by CSD Provision F.2. As noted above, the

subject waste is collected in bins and is not discharged to the ground. As mentioned in the discussion for CSD Provision E.3.d.ii and as documented in the *PXP Retention Basin Study*, the oil field retention basins are adequately size and maintained to handle the contents of the largest tank at the oil field along with 100-year storm event precipitation volume. Therefore, any spilled fluid waste material will remain within the oil field secondary containment and or retention basin system and not cause any offsite impacts. The retention basins are visually inspected during the dry months by the County ECC to confirm they are clean and free of debris and are prepared for each rain year by a storm water management consultant.

CSD Provision E.11.c requires compliance with an approved recycling Plan. The *PXP Recycling Plan Inglewood Oil Field* was approved on October 3, 2011. The Plan, originally submitted as required by CSD Provision L.9, on May 26, 2009, details the approach to recycling various types of waste at the oil field. The Plan provides protocols for the following types of recycled waste; tires, cell phones, batteries, scrap metal, computer components, industrial waste, office waste, and landscaping waste. The Plan also includes an education program for employees and contact information for waste recycling and disposal vendors.

The provision is considered to be fully effective at this time and no further analysis is recommended.

**New Technology:**

The oil field waste removal system currently implemented at the oil field is considered to be consistent with current technology. The oil field contains all waste from drilling, re-drilling, and reworking activities in bins and does not use in-ground sumps or pits. The recycling Plan approved by the County includes current recycling techniques and waste streams, however, new technologies in recycling in the future should be considered as applicable at the oil field.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended, oil field waste is contained and recycled as required; therefore, no changes to implementation are recommended.



**Recommendations to Changes in CSD Language:**

This requirement is implemented as intended consistent with the CSD language, and no changes in CSD language are recommended.

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***E.12 Construction of Private Roads.*** Roads and other excavations shall be designed, constructed, and maintained to provide stability of fill, minimize disfigurement of the landscape, prevent deterioration of vegetation, maintain natural drainage, and minimize erosion. Prior to construction of any new road, the operator shall prepare and submit to the director of public works for review and approval a private road construction Plan. The operator shall thereafter comply with all provisions of the approved private road construction Plan. All new private access roads leading off any surfaced public street or highway shall be paved with asphalt or concrete not less than three inches thick for the first 50 feet of said access road from the public street or highway.

**Summary of Complaints:**

No private roads have been constructed at the Inglewood Oil Field since the adoption of the CSD; no complaints on this provision have been received by the County.

**Summary of Issues Raised by the Public:**

No private roads have been constructed at the Inglewood Oil Field since the adoption of the CSD and no issues regarding the construction of private roads have been raised by the public to date.

**Analysis of Compliance and Effectiveness:**

No private roads have been constructed to date and all oil field activities utilize existing access roads. This requirement has not been activated to date, and no further evaluation is recommended.

**New Technology:**

No private roads have been constructed at the oil field since the adoption of the CSD; however, as required by the CSD provision, any new road requires the preparation and approval of a private road construction Plan. Required review of any future Plan for a private road by the director of public works will allow for review of new technology or updated County grading requirements. Therefore, implementation of such new technology can be required as applicable.

**Recommendations to Changes in Implementation:**

This requirement has not been activated to date; therefore, no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

This requirement has not been activated to date and no changes to the CSD language are recommended.

**E.13 Signs.** All signage shall comply with Part 10 of Chapter 22.52 of Title 22. In addition, the operator shall comply with the following provisions:

a. **Perimeter Identification Signs.** Identification signs, at intervals acceptable to the director, shall be posted and maintained in good condition along the outer boundary line fence and along the fences adjoining the public roads that pass through the oil field. Each sign shall prominently display current and reliable emergency contact information that will enable a person to promptly reach, at all times, a representative of the operator who will have the expertise to assess any potential problem and recommend a corrective course of action. Each sign shall also have the telephone number of the county department of regional planning zoning enforcement section and the number of SCAQMD that can be called if odors are detected.



Emergency Contact Number Signage

b. **Main Entrance Sign.** A sign shall be posted and maintained in good condition at the main entrance of the oil field prominently displaying a telephone number by which persons may contact a representative of the operator at all times to register complaints regarding oil field operations.

c. **Other Required Signs.** All identification signs, warning signs, no trespassing signs, and other signs required by county, State and federal regulations shall be properly posted and maintained in all required locations and in good condition.

d. **Well Identification Signs.** Well identification signs including the well name and well number shall be posted and maintained in good condition at each well location.

e. **No Littering Signs.** "No littering" signs shall be prominently posted and maintained in good condition on all oil field entrance gates.

**Summary of Complaints:**

The County approved the *Signage Plan Inglewood Oil Field* on May 18, 2009 and the required signage was installed. No complaints regarding the signage have been received by the County.



Drill Rig Safety Signage

**Summary of Issues Raised by the Public:**

The County has not noted any issues raised by the public with regard to the facility signage.

**Analysis of Compliance and Effectiveness:**

The installation of the signage required by this CSD provision was completed upon approval of the *Signage Plan Inglewood Oil Field* dated January 2009 (Revision 1) approved by the County on May 18, 2009. The required signage

is periodically reviewed during inspections completed by the County ECC. Faded or damaged signage is noted and recommended for repair or replacement. The 1-800 24-hour contact number, the South Coast Air Quality Management District, and the L.A. County Department of Regional Planning Zoning Enforcement section have all received calls from the public inquiring about oil field activities since the installation of the signs. Some of this correspondence indicates the signage may be providing the public with contact information as intended under CSD Provisions E.13.a and E.13.b (the contact information is also available via the Inglewood Oil Field and County DRP web sites).

FM O&G is currently in the process of reviewing and replacing applicable signs to reflect the name change from PXP to FM O&G. The provision is considered to be fully effective at this time, no further analysis is recommended.



Prop. 65 Signage Along Stocker St.

**New Technology:**

As noted above, the County ECC inspector notes when signage requires replacement or repair. Therefore, signs will be updated periodically to ensure they are legible and meet the requirements of the CSD.

**Recommendations to Changes in Implementation:**

The required signage at the oil field was installed per the signage Plan approved on May 18, 2009; no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

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***E.14 Painting.*** All oil operation-related structures visible from public roadways and surrounding properties within the oil field shall be painted or otherwise surfaced or textured with a color that is compatible with the surrounding areas and has been approved by the director. The painting or other surfacing of all structures covered by this subsection shall thereafter be maintained in good condition.

**Summary of Complaints:**

No complaints regarding the painting of the Inglewood Oil Field have been received by the County.

**Summary of Issues Raised by the Public:**

The County has not noted any issues raised by the public with regard to the painting of the Inglewood Oil Field.

**Analysis of Compliance and Effectiveness:**

The painting of the Inglewood Oil Field structures and equipment was completed on November 12, 2012. The paint color, *licorice*, was chosen with assistance of a

landscape architect and was approved by the LA County Department of Regional Planning. The color, which is much darker than the previous industry standard paint color tan or light brown, is intended to blend and be compatible with surrounding areas. The *Annual Well Increase Evaluation, December 2011*, included a discussion of the painting of the oil field facilities and the darker color of paint. The report concluded that the dark color helps to blend the equipment into the background, thereby reducing the visual and aesthetics of the oil field.

Prior to completion of the painting in November, 2012, semi-annual status reports were submitted to the County for review to document progress of the facility painting. Although the initial painting effort for the oil field was completed in late 2012, maintenance of the painting and coatings of the equipment and structures at the oil field is a continuous process and FM O&G employs a full-time painter to maintain the coatings on the structures and equipment at the oil field.



New Water Plant Tank Paint

The Inglewood Oil Field has been painted with a color approved by the County and the coatings are maintained by a full-time painter on FM O&G's staff. The provision is considered to be fully effective at this time, no further analysis is recommended.

**New Technology:**

As noted above, the painting color approved is darker than the previous industry standard color of tan or light brown. Darker colors have been shown to blend and be more compatible with surrounding areas than the lighter shades previously chosen for oil field facilities.

**Recommendations to Changes in Implementation:**

The required painting of the Inglewood Oil Field was completed with the approved color in November, 2012. The coatings are maintained by a full-time painter, therefore, the implementation of the condition is complete and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The required painting and maintenance of the coatings of the Inglewood Oil Field structures and equipment has been implemented; no changes to the CSD language are recommended.

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***E.15 Sumps. The operator shall comply with the following provisions:***

*a. Sump Clean Out. All sumps that are used, installed, or maintained for use in connection with any well, and which have not been used for 90 days for the operation of*

*or the drilling, redrilling, or reworking of such well or any other well in the vicinity, shall be cleaned out, and all oil, rotary mud, and rubbish removed.*

*b. Sump Fencing. Around each sump of any depth, there shall be erected and continuously maintained a fence that encloses the sump and complies with the requirements of Sections 11.48.010 - 11.48.050, Title 11 of the County Code. This provision shall not apply to sumps that are constantly and immediately attended while drilling, redrilling, and reworking operations are proceeding as specified in Section 11.48.020, Title 11 of the County Code.*

**Summary of Complaints:**

All sumps were cleaned out, filled in with clean soil and re-graded to surrounding topography in 2007. No new sumps have been installed or used for any oil field activities since the adoption of the CSD; no complaints regarding sumps have been received by the County.

**Summary of Issues Raised by the Public:**

As noted above, all oil field sumps have been cleaned out and filled in and no new sumps have been installed since the adoption of the CSD. The County has not noted any issues raised by the public with regard to sumps.

**Analysis of Compliance and Effectiveness:**

As discussed above, all historical sumps that existed on site were cleaned out, filled in with clean soil, and re-graded to match the surrounding topography in 2007. PXP, and now FM O&G, have not installed or used sumps for any oil field activities since the adoption of the CSD. The use of bins and portable tanks, often called by the vendor name "Baker Tanks", is now common and standard practice in most oil and gas fields in California. These metal and plastic container structures have eliminated the need for the installation and use of in the ground sumps. The use of these portable structures has also eliminated the need for provision language requiring the clean out of sumps upon cessation of the associated drilling activity as the structures are not permanent and are moved from one job site to the next.

The requirement has not been activated to date due to the fact that the oil field no longer contains sumps or sump fencing and the use of portable metal or plastic bins and tanks and have replaced the need for them. It is recommended that the Operator continue the use of metal and or plastic bins and tanks consistent with standard industry practice. Eliminating the use of below-ground sumps with above-ground metal or plastic containment structures is considered to be an environmental benefit due to the fact that the oil, drilling mud and other fluids are confined to a better containment structure that is both easier to clean and remove from the drill site.

**New Technology:**

As noted above, the use of below ground sumps has been widely replaced by metal or plastic bins and tanks for most oil and gas facilities in California. FM O&G does not use below-ground sumps at the oil field adopting, the use of the portable bins and tanks as standard operating procedure for all drilling activities.

**Recommendations to Changes in Implementation:**

As previously discussed, the Inglewood Oil Field does not contain sumps and the use of sumps was discontinued prior to the adoption of the CSD. It is recommended that the Operator continue the practice of using above-ground bins, and no other changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

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***E.16 Well Cellars.*** All well cellars shall be constructed in accordance with the most current American Petroleum Institute standards. In addition, the operator shall comply with the following provisions:

*a. Cellar Fluids.* Well cellars shall be kept free of all oil, water, or debris at all times. During drilling, re-drilling, and reworking, the cellar shall be kept free of excess fluids by a pump which discharges into a waste tank, mud pit, vacuum truck, or other approved disposal system.

*b. Access to Multi-Well Cellars.* All multi-well cellars exceeding three feet in depth and 25 feet in length shall have two means of entrance and exit and an additional exit for every 50 feet in length thereafter. At least one means of entrance or exit for all multi-well cellars of 25 feet in length shall be a stairway constructed to California Division of Industrial Safety standards.

*c. Single-Cellar Covers.* All single-cellars shall be covered with open grating and have no openings larger than three inches at any point. Covers shall be capable of supporting vehicle weight or guardrails shall be erected to prevent vehicle access.

*d. Cellar Ladder Openings.* All openings for ladders through grating shall be designed to allow exit from underside without obstruction and shall be kept free of storage of any type. Said openings shall not be less than 24 inches on either side.

**Summary of Complaints:**

No complaints regarding the oil field well cellars have been received by the County.

**Summary of Issues Raised by the Public:**

There have been no issues raised by the public regarding well cellars.

**Analysis of Compliance and Effectiveness:**

The well cellars at the oil field are inspected annually by DOGGR and any time the associated well is re-worked, a DOGGR permit is required and thus reviewed. The cellars are kept free of fluid and debris and are inspected daily by operations staff. The well cellars are also checked periodically by the County ECC during site inspections. As noted in the discussion on CSD Provision E.15, bins and tanks are used for all drilling, re-drilling and reworking activities on the oil field; mud pits or sumps are no longer utilized. The oil field does not contain any multi-well cellars; all well cellars are of

the single-well cellar type; therefore, E.16b does not currently apply to any existing oil field structures.

All well cellars in the oil field are covered with an open grating and surrounded with fencing to prevent vehicle access. The well fencing includes signage depicting the name of the well per the requirements listed in CSD Provision E.13.d. None of the wells require cellar ladder openings due to the shallow depth of the cellars.

Well cellars at the oil field meet current API standards as required and reviewed during DOGGR and County inspections, the provision is considered to be fully effective at this time, no further analysis is recommended.

**New Technology:**

As noted above, the well cellars on the oil field are required to meet the standards and specifications of the API. Therefore as new technologies for well cellars are developed and adopted by the API; those technologies would be required by the CSD without a need for any specific provision language changes.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No recommendations in the CSD language are recommended at this time.

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***E.17.Stormwater Drainage Management.*** *The operator shall comply with the following provisions:*

*a. Construction Storm Water Pollution Prevention Plan ("CWPPP"). The operator shall maintain and implement all provisions of a storm water pollution prevention plan ("SWPPP") that has been inspected by the Regional Water Quality Control Board and the county department of public works. The operator shall provide the director and the director of public works with a copy of the SWPPP, and any future modifications, revisions, or alterations thereof, or replacements therefore. The SWPPP shall be updated prior to new construction activities as required by the Regional Water Quality Control Board.*

*b. Spill Prevention, Control, and Countermeasure Plan ("SPCCP"). The Operator shall maintain and implement all provisions of a spill prevention, control, and countermeasure Plan ("SPCCP") which meets the requirements of the Local California Unified Program Agency and the United States Environmental Protection Agency. The operator shall provide the director and the fire chief with a copy of the SPCCP and any future modifications, revisions, or alterations thereof, or replacements therefore.*

*c. Hydrological Analysis. A site-specific hydrologic analysis shall be completed to evaluate anticipated changes in drainage patterns and associated increased runoff at*



*the site for any new grading that results in the loss of vegetated, sandy, permeable ground areas, which could alter surface runoff at the site. The analysis shall be completed consistent with Standard Urban Stormwater Mitigation Plan regulations, as specified in the county department of public works Hydrology Manual as amended. The hydrological analysis shall be submitted to the director of public works for review and approval. The new grading that required the hydrologic analysis shall not occur until approval of the analysis by the director of public works.*

**Summary of Complaints:**

There have been no complaints regarding the stormwater drainage management plans approved for the oil field.

**Summary of Issues Raised by the Public:**

The County has not received any input from the public on the oil field SWPPP or SPCCP.

**Analysis of Compliance and Effectiveness:**

The oil field SWPPP is updated as needed and submitted to the RWQCB and the DPW for review. Recent versions of the SWPPP include the requirements and associated general permit (CAS000002) for compliance with the National Pollution Discharge Eliminations System (NPDES). Recent updates to the SWPPP have been submitted annually along with the Master Grading Plan, the current SWPPP is dated August 2013. FM O&G utilizes an environmental consulting company with expertise in storm water management to assist with implementation of the provisions of the SWPPP and prepare the oil field for each storm season.



Vickers Basin Storm Water Testing

The *Spill Prevention, Control and Countermeasure Plan* (SPCCP), required under CSD Provision E.17.b., provides detail on the maintenance of tank and related equipment at the oil field which include inspection programs, corrosion prevention/corrosion monitoring techniques, and clean-up equipment. The Plan also includes potential spill scenarios for each tank with containment calculations documenting the adequacy of the containment structures. The Plan is updated every five years; the most recent spill containment response training was completed on February 12, 2013.

The hydrologic analysis listed under Provision E.17.c has not occurred to date because no oil field projects have triggered the requirement. Projects at the oil field to date, as detailed and reviewed in the annual master grading plan submittals, have not resulted in sufficient disturbance or loss of vegetated, sandy, or permeable ground areas that have altered surface runoff at the site. Thus this provision has not been triggered to date.



The provision is considered to be effective at this time, no further analysis is recommended.

**New Technology:**

Both the SWPPP and the SPCCP are reviewed by applicable regulatory agencies. As noted above, agencies involved in overseeing these plans include the County, RWQCB, the Local California Unified Program Agency and the United States Environmental Protection Agency. These evaluations allow for new technologies in storm water drainage management and spill control to be added to the subject plans as needed, and those new technologies can be required by the CSD through Plan changes and compliance and do not necessitate amendments to the CSD language.

**Recommendations to Changes in Implementation:**

The required storm water and spill control plans and measures are current and in place, therefore, no change in the implementation of the provision is recommended.

**Recommendations to Changes in CSD Language:**

The CSD language allows for review and revision of the subject plans through the oversight of the agencies listed above, thus the requirements of this provision can be updated as necessary; therefore, no changes in CSD language are recommended.

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***E.18 Water Management Plan.*** *The operator shall comply with all provisions of a water management plan that has been approved by the director and the director of public works. The plan shall include best management practices, water conservation measures, the use of a drip irrigation system, and shall include provisions for the use of surface water runoff in the retention basins for dust suppression and landscaping. The plan shall also address the availability of reclaimed water for use at the oil field. The water management plan shall be reviewed by the operator every three years to determine if modifications to the plan are required. The operator shall make changes to the plan if requested by the director or the director of public works. Any modifications to the water management plan shall be submitted to the director and the director of public works for review and approval. The water management plan shall include any elements requested by the director or the director of public works. In addition, the operator shall comply with the water conservation measures and reporting requirements specified in Sections 20.09.020 - 20.09.080, Title 20 of the County Code (Utilities).*

**Summary of Complaints:**

No complaints associated with the water management plan for the oil field have been received by the County.

**Summary of Issues Raised by the Public:**

The public has not provided any input on the



Water Pump with Noise Insulation

water management plan for the oil field.

**Analysis of Compliance and Effectiveness:**

The *Water Management Plan Inglewood Oil Field* was initially submitted in May 2009 and was formally approved by County Public Works on August 8, 2012 and the County DRP on September 13, 2012. The Plan includes water conservation measures for office, landscaping, operations, and maintenance water uses. The Plan also includes a section on employee awareness to encourage water conservation. One of the main water conservation measures is the use of water contained in retention basins for dust suppression. This measure has been fully implemented as documented by the County ECC during periodic inspections. A pump and portable above-ground storage tank system is currently at use at the Dabney-Lloyd retention basin to supply water for dust control applications. Starting with the 2014/2015 rain season, FM O&G installed temporary pumps and storage tanks at all of the oil field retention basins to allow for recycling of storm water when feasible.

The CSD does not require submittal of water usage records, however, the Baldwin Hills CSD EIR provided the average water use for 2006-2007 as 160,104 gallons per day. Water use for 2013 was reported by FM O&G at the December 2014 CAP meeting as 129,000 gallons per day average. The water Plan has been submitted and approved as required, the provision is considered to be fully effective at this time.

**New Technology:**

The CSD provision language includes requirements for operator review of the Plan every three years to determine if modifications are required and for the operator to make changes to the Plan if requested by the director of DPW. In addition, the language also requires compliance with the water conservation measures as specified in the County Code. Therefore, as new technologies in water management are developed and new requirements are added to the County Code, the CSD provision allows for implementation of those new technologies as directed by the director of DPW or by reference to the County Code.

**Recommendations to Changes in Implementation:**

The Water Management Plan is approved and implemented as intended, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

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***E.19 Groundwater Monitoring.*** *The operator shall develop, implement, and carry out a groundwater quality monitoring program for the oil field that is acceptable to the director and consistent with all requirements of the Regional Water Quality Control Board. Pursuant to the approved program, the operator shall install and maintain groundwater monitoring wells in the vicinity of each surface water retention basin, which is permitted by the Regional Water Quality Control Board. Such monitoring wells shall be completed to the base of the permeable, potentially waterbearing, alluvium, Lakewood Formation,*

*and San Pedro Formation, and to the top of the underlying, non-water bearing Pico Formation, as determined by a California-certified professional geologist. The Regional Water Quality Control Board and the director shall be regularly advised of the results of such monitoring and shall be immediately advised if such monitoring indicates a potential problem.*

**Summary of Complaints:**

No complaints associated with the groundwater monitoring program for the Inglewood Oil Field have been received by the County.

**Summary of Issues Raised by the Public:**

The Regional Water Quality Control Board (RWQCB) provided a comment on the groundwater monitoring program in a letter dated October 17, 2012 regarding the *2013 Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan*. The RWQCB recommended the installation of an up gradient groundwater monitoring well (or network) to measure water quality conditions at the perimeter of the oil field or up gradient to the field. This recommendation was also discussed at the October 2013 CAP-meeting with several members of the public also requesting that additional up gradient monitoring wells be installed, see additional subject discussion below.

**Analysis of Compliance and Effectiveness:**

The *Groundwater Monitoring Program and Work Plan Inglewood Oil Field Plan* was submitted in August of 2009. The Plan described the groundwater quality monitoring program including the site geology/hydrology, proposed monitoring well locations, the sampling and monitoring procedures, well installation method, data collection, and data quality assurance and control procedures. The Plan was approved by the RWQCB in September 2009 and by the County in November 2009. Monitoring wells were installed between January 2010 and March 2010 with monitoring reports starting the first quarter of 2010. Monitoring reports have been submitted quarterly to the RWQCB and the County since the monitoring effort began in early 2010. On February 7, 2013, the RWQCB approved a new array of ground monitoring wells for the Amended Waste Discharge Requirements for the Oil Field and Land Treatment Units Operations. These wells do not alter the wells required by the CSD but do enhance the ground water monitoring program per the RWQCB.

Groundwater monitoring samples are analyzed for a variety of contaminants and compared to State Maximum Contaminant Levels (MCLs) for drinking water standards. Sampled contaminants include petroleum hydrocarbons, diesel range organics, benzene, toluene, ethyl benzene, xylenes (BTEX), Methyl Tert Butyl Ether (MTBE), metals, oxygen, nitrate, and nitrite. Results from the monitoring program for all sampled parameters to date are below the applicable MCL for drinking water standards. The groundwater sampling program has also determined that the water bearing zones at the oil field are discontinuous with each other and are discontinuous with the water supply aquifers in the Los Angeles Basin.

The report prepared by the County in response to the request by PXP in October 2011 to increase the annual number of wells allowable for drilling or redrilling, the *Annual Well*

*Increase Evaluation, December 2011*, included analysis on the implementation of the ground water quality provision of the CSD. The report concluded that the CSD has been effective at controlling ground water contamination to levels that are protective of the health and general welfare of the public.

The groundwater monitoring program has been implemented and is ongoing with quarterly reports submitted to the RWQCB and the County as required. The provision is considered to be fully effective at this time.

**New Technology:**

The CSD provision language requires that the monitoring program be consistent with all requirements of the RWQCB. As new technologies in groundwater monitoring are reviewed and adopted by the RWQCB, the new technologies can be required pursuant to RWQCB direction.

**Recommendations to Changes in Implementation:**

The groundwater monitoring program has been implemented and is ongoing. The existing ground water monitoring system network was designed with input from the RWQCB, however, the RWQCB provided a recommendation in their review of the 2013 Annual Drilling Plan to install up gradient wells as discussed above. The installation of such wells remains a recommendation as recent permits issued by RWQCB to FM O&G have not required the installation of up gradient monitoring locations. It should be noted that the RWQCB can request from the operator an amendment to the Groundwater Monitoring Program requiring up gradient wells under their own authority independent of the CSD. Therefore, it is recommended that the Operator coordinate with the RWQCB and install additional groundwater monitoring wells if deemed necessary in the future. No other changes to the provision implementation are recommended.

**Recommendations to Changes in CSD Language:**

The groundwater monitoring program has been implemented with the required reports submitted to the RWQCB and the County. No change to the CSD language is recommended. As discussed above regarding an up gradient monitoring location, if the RWQCB determines additional monitoring well locations are required, that requirement can be made as part of continuous compliance with the Plan and consistent with the language of the CSD provision and no changes in the CSD language would be required to add additional monitoring well locations. Therefore, no changes to the provision language are recommended at this time.

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***E.20 Fencing.*** *All portions of the oil field on which oil operations are conducted shall be enclosed with a fence compliant with DOGGR regulations codified at California Code of Regulations Title 14, Article 3, sections 1778 and 1779, or as may be subsequently amended by the State.*

**Summary of Complaints:**

The oil field is completely fenced with a chain-link type fence that meets the requirements of the CSD fencing provision; the County has not received any complaints on the facility fencing.

**Summary of Issues Raised by the Public:**

The oil field is completely fenced with a chain-link type fence that meets the requirements of the CSD fencing provision; no issues on the facility fencing have been raised by the public.

**Analysis of Compliance and Effectiveness:**

The CSD requirement references the California Code of Regulations, DOGGR regulations for oil field enclosures (fencing). The oil field is completely fenced with chain-link type of fencing. The DOGGR requirement for chain link fencing is as follows; *(1) fences shall be not less than 5 feet high and mounted on 1 1/4" diameter steel posts with at least three strands of barbed wire mounted at a 45-degree angle from the top of the fence, (2) the fence shall be constructed of chain link or other industrial-type fencing of not less than 11-gauge wire and of not greater than 2-inch nominal mesh, (3) supporting posts shall be securely anchored to the surface, spaced no more than 14 feet apart, and (4) Tension wires of at least No. 9 gauge coil spring wire, or equivalent, shall be stretched at the top and bottom of the fence fabric and shall be fastened to the fabric at 24-inch intervals, there shall be no aperture large enough to permit any child to crawl under.*

The DOGGR fencing requirement further lists criteria for gates and sump screening. Gates are required to be *of a structure substantially the same as the required fences and shall be kept secured when not attended by an adult.* The gates at the oil field are chain link and are constructed consistent with the chain link fencing structure. As discussed for CSD Provision 15, *Sumps*, the facility does not have sumps nor are sumps used for any current oil field activity thus the DOGGR requirement for sumps is not applicable.

On at least one occasion, an unauthorized man gained access to the oil field by crawling under the fence in areas where the fence was not adequately secured to the ground. On another occasion, a man opened a water pipe and caused flooding of a well pad area. The ECC has requested that fencing be inspected by the Operator to address vulnerable areas and ensure that breaches can be avoided. Overall, the chain link fencing at the Inglewood Oil Field meets the DOGGR requirements listed above, therefore the provision is considered to be effective at this time.

**New Technology:**

As listed above in the CSD Provision language, the requirement lists the DOGGR regulation as *may be subsequently amended by the State.* Therefore, if the regulation is amended to reflect new technologies or requirements in fencing, the new requirements will be incorporated into the CSD as needed.

**Recommendations to Changes in Implementation:**

The installed fencing at the Inglewood Oil Field meets the CSD provision requirements. Further, the fencing is periodically reviewed during the County ECC inspection process. However, as noted above, there have been breaches of the fence in the past by unauthorized persons and the Operator has been requested to monitor and repair fencing as appropriate. The ECC and the Operator need to remain vigilant of potential vulnerable areas to avoid future breaches. With this continued vigilance no additional implementation changes are recommended.

**Recommendations to Changes in CSD Language:**

The installed fencing at the Inglewood Oil Field meets the CSD Provision requirements. In addition, the requirement provides for amended language should the State regulations change; therefore, no changes in the CSD language are recommended.

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***E.21 Oil Field Cleanup and Maintenance.*** *The operator shall maintain the site in a clean and orderly condition and shall comply with the following provisions:*

*a. Equipment Removal. All facilities that have reached the end of their useful economic life shall be properly decommissioned and removed from the oil field within one year. Areas not slated for future use shall be restored and revegetated within 90 days of termination of use, unless such restoration and revegetation would interfere with fire safety or access to oil operations.*

*b. Equipment Maintenance. All equipment, improvements, facilities, and other personal property or fixtures located on the oil field shall be maintained in good condition to the satisfaction of the director and the director of public works.*

*c. Site Debris and Vegetation. The operator shall keep the property free of debris and vegetation overgrowth to the satisfaction of the director. All outside storage of parts or equipment shall comply with Part 7 of Chapter 22.52 of the County Code.*

**Summary of Complaints:**

No complaints regarding the cleanup and maintenance of the Inglewood Oil Field have been received by the County.

**Summary of Issues Raised by the Public:**

Input on the aesthetics of the oil field relative to the facility equipment and vegetation was received by the County in comments solicited for the Periodic Review. Two comments noted rusting pipes along the perimeter of the oil field and one described a dead tree visible from Fairfax Avenue. A follow-up investigation on the dead tree issue determined the tree was not located on oil field property. The County has asked the operator to review the status of pipelines visible along the fence line of the oil field.

Input on equipment removal, and the equipment removal plan required by CSD provision L.14, was also received as part of the Settlement Agreement dated July 15, 2011 negotiated between concerned public parties, the County and PXP (now FM

O&G). The *Unused or Abandoned Equipment Removal Plan Inglewood Oil Field* was submitted and implemented as required in 2009. Term 12 of the Settlement Agreement requires the operator to update the Plan periodically should equipment not included in the 2009 Plan become unused or abandoned. The Plan was most recently updated in December 2012.

**Analysis of Compliance and Effectiveness:**

The *Unused or Abandoned Equipment Removal Plan Inglewood Oil Field* describes the equipment removal activities completed since the adoption of the CSD. Figure 1 of the Plan provides a table listing 64 pieces of equipment that were removed in 2008 and 2009. The table also includes four tanks that were removed in 2012 documenting that the update of the Plan required by the Settlement Agreement has been implemented. The Plan includes removal procedures to ensure equipment is removed with appropriate removal measures for safety and to minimize environmental impact.

Equipment at the oil field is inspected and maintained by the field operations staff with operators completing rounds of the facility daily. All oil field equipment, and the associated maintenance of that equipment, is tracked and scheduled with a vendor-supplied computer based maintenance management program (Maximo®). The operator also conducts annual internal safety audits of the facility which provide for review and inspection of the oil field equipment. There have been no issues with equipment maintenance requiring County DRP or Public Works involvement since the adoption of the CSD.

The report prepared by the County in response to the request by PXP in October 2011 to increase the annual number of wells allowable for drilling or redrilling, the *Annual Well Increase Evaluation, December 2011*, includes analysis on the implementation of the visual and aesthetics provisions of the CSD. The report documents that equipment removal activities have begun and that 60 pieces of unused equipment had been removed as of the date of the report.

Part 7 of Chapter 22.52 of the County Code stipulates that a property cannot be used for outside storage or display of raw materials, equipment or finished products unless the storage meets certain Code requirements. Outside storage of equipment at the oil field is consistent with this requirement and typical for an oil and gas operation. Examples of outside equipment storage include the pipe rack yard and hazardous materials area.

The operation of the oil field meets the requirements of the site cleanup and equipment maintenance stipulations of this provision. The amended requirement for periodic updating of the Equipment Removal Plan ensures equipment no longer in use will be removed from the facility in a timely fashion. Equipment at the oil field is maintained and stored as required, therefore, the provision is considered to be fully effective at this time and no further analysis is recommended.

**New Technology:**

The Equipment Removal Plan includes measures for the safe and environmentally beneficial removal of equipment at the oil field. The Plan is updated and reviewed periodically by the County which will allow for new technologies associated with equipment removal to be implemented as they are developed.

**Recommendations to Changes in Implementation:**

The requirements for site cleanup and equipment maintenance of this provision have been implemented. Further, the periodic update of the Equipment Removal Plan required by the Settlement Agreement strengthens the intent of the requirement. No changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

As noted above, the Settlement Agreement augmented the existing CSD language to require periodic updates to the Equipment Removal Plan. No changes in the CSD language are recommended.

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***E.22 Security.*** *All unmanned entrances to the oil field shall be equipped with sliding gates which shall be kept closed at all times except when authorized vehicles are entering or leaving the oil field. The operator shall have a security guard on duty 24 hours per day.*

**Summary of Complaints:**

The Inglewood Oil Field is completely fenced with a chain-link type fence that meets the requirements of the CSD fencing provision with sliding gates at all unmanned entrances. The County has not received any complaints regarding security at the Inglewood Oil Field.

**Summary of Issues Raised by the Public:**

The County has not received any concerns regarding security at the Inglewood Oil Field.

**Analysis of Compliance and Effectiveness:**

CSD requirement E.20 requires the oil field facility to be enclosed by fencing that meets DOGGR regulations. The gates associated with the facility fencing are also required to meet the DOGGR regulations for oil field enclosures. All gates at the oil field are consistent with these regulations and all unmanned entrances are equipped with the required sliding type gates. Current security at the oil field includes a 24-hour guard at the main entrance gate to the field off of Stocker Street and a guard at the entrance to the field and offices off of Fairfax Street. All vehicles must check in with the guard and sign in prior to gaining access to the oil field. The guard shack facilities have land line telephone access to



Gate Entrance Signage



the main office building to obtain authorization clearance to allow access for visitors not previously cleared for entrance. Prior to the facility security described above instituted by FM O&G, PXP maintained a guard 24 hours a day at the main field entrance off of Stocker Street; access to the oil field from Fairfax Street was restricted by a locked gate. The oil field security provisions are inspected annually by DOGGR.

The unmanned gates and site security at the oil field meet the requirements of the CSD provision and no significant issues regarding the security of the facility have occurred to date. Issues related to an unauthorized man repeatedly accessing the oil field by sliding underneath a fence are addressed under CSD provision E.20 above. This provision is considered to be fully effective at this time and no further analysis is recommended.

**New Technology:**

As noted above, CSD provision E.20, requires that facility gates meet DOGGR regulations as *may be subsequently amended by the State*. Therefore, if the regulation is amended to reflect new technologies with regards to gates, the new requirements will be incorporated into the CSD provision by reference.

**Recommendations to Changes in Implementation:**

The unmanned gates and site security at the oil field meet the requirements of the CSD provision; no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The unmanned gates and site security at the Inglewood Oil Field meet the requirements of the CSD provision and no significant issues regarding the security of the facility have occurred to date. Therefore, no changes in the CSD language are recommended.

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**E.23 Vehicle Parking.** *Vehicular parking shall comply with Part 11 of Chapter 22.52 of County Code.*

**Summary of Complaints:**

The parking facilities at the Inglewood Oil Field meet both the requirements of the CSD provision and the demand of the FM O&G oil field operations. The County has not received any complaints with regards to vehicle parking.

**Summary of Issues Raised by the Public:**

All vehicle parking for FM O&G oil field operations occurs on-site and does not impact the public; no issues relating to vehicle parking have been raised by the public.

**Analysis of Compliance and Effectiveness:**

The CSD requirement references the parking requirements of the LA County Code. The applicable requirements for an industrial land use are detailed in Section 22.52.1140 as follows; *there shall be provided parking space for all vehicles used directly in the conducting of such use and, in addition, not less than one automobile parking space for each two persons employed or intended to be employed on the shift*

*having the largest number of employees, or each 500 square feet of floor area of the building used for such use, whichever is the larger.*

The oil field contains sufficient parking for all employee, subcontractor, visitor, and heavy equipment vehicles. Marked parking spaces at the office building and warehouse areas are consistent with County code requirements. No vehicles associated with oil field operation park off-site; therefore, parking of vehicles for oil field operations does not impact any public parking facility. This provision is considered to be fully effective at this time and no further analysis is recommended.

**New Technology:**

The vehicle parking capacity at the oil field is sufficient and meets County code requirements, a discussion on new technology is not applicable.

**Recommendations to Changes in Implementation:**

This requirement has been appropriately implemented, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

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***E.24 Sanitation.*** *The operator shall comply with the following provisions:*

*a. Garbage and Refuse. The oil field shall be maintained in a clean, sanitary condition, free from accumulations of garbage, refuse, and other wastes.*

*b. Toilets and Wash Facilities. Sanitary toilet and washing facilities shall be installed at any site where personnel are permanently stationed. Portable facilities shall be provided wherever crews are temporarily employed. Such facilities shall be maintained in a clean and sanitary condition at all times.*

**Summary of Complaints:**

No complaints associated with garbage and refuse at the oil field have been received by the County. Oil field toilets and wash facilities are not open to the public.

**Summary of Issues Raised by the Public:**

No issues regarding garbage and refuse at the Inglewood Oil Field have been raised by the public. Oil field toilets and wash facilities are not open to the public.

**Analysis of Compliance and Effectiveness:**

Garbage and refuse are picked up and removed weekly by a subcontractor garbage collection company. Garbage bins are located at the office, the warehouse, and other locations throughout the oil field.

Permanent toilet and wash facilities are located at the office building, the warehouse, the gas plant, the “halfway house” across from the gas plant, and at two modular

buildings used by sub-contractors. The restroom facilities are maintained by a sub-contractor janitorial service. Portable facilities are located throughout the field and moved as needed, the portable restrooms are maintained by the subcontractor providing the units.

The provision is considered to be fully effective at this time, no further analysis is recommended.

**New Technology:**

New technologies in garbage and refuse collection such as improvements in the collection trucks would be implemented by the subcontractor providing the service as required by regulations outside the scope of the CSD.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

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***E.25 Storage of Hazardous Materials.*** *The operator shall comply with all provisions of a hazardous materials business plan that has been submitted to the fire chief. The operator shall deliver to the fire chief for review and approval an updated hazardous material business plan on an annual basis. This plan shall provide the location of where hazardous materials are stored at the oil field. Hazardous materials shall be stored in an organized and orderly manner and identified as may be necessary to aid in preventing accidents, and shall be reasonably protected from sources of external corrosion or damage to the satisfaction of the fire chief.*

**Summary of Complaints:**

No complaints associated with the Hazardous Materials Business Plan for the Inglewood Oil Field have been received by the County.

**Summary of Issues Raised by the Public:**

No issues regarding the Hazardous Materials Business Plan for the Inglewood Oil Field have been raised by the public. However, questions were raised during the June, 2013 CAP meeting in reference to the relocation of the hazardous materials storage area from near the Operator's office and La Brea Boulevard to a more central location within the oil field. The storage area is a staging area for new product



Hazardous Material Storage with Secondary Containment Curb

(lube oils for equipment); empty drums ready for re-cycling; and hazardous waste (partially empty paint cans and damaged aerosol cans). No additional comments were brought up on this issue.

**Analysis of Compliance and Effectiveness:**

The Hazardous Materials Business Plan for the oil field is submitted to the Fire Department for review and approval on an annual basis as required. Hazardous materials at the oil field are stored in a location near the facility pipe yard. The storage area consists of a concrete pad with secondary containment to capture potential spills. Hazardous materials are organized by chemical type and containers are labeled per Department of Transportation (DOT) and National Fire Prevention Association (NFPA) regulations. The hazardous materials storage area is periodically inspected by the Fire Department. The provision is considered to be fully effective at this time, no further analysis is recommended.

**New Technology:**

The Hazardous Materials Business Plan is submitted to, reviewed, and approved by the Fire Department annually. As new technologies are developed in the storage of hazardous materials the Fire Department can request implementation of those new technologies through the Business Plan review and approval process.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

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***E.26. Drilling, Redrilling, and Reworking Operations. The operator shall comply with all of the following provisions:***

*a. DOGGR Regulations. All DOGGR regulations related to drilling, redrilling, and reworking operations.*

*b. Number of Drilling and Redrilling Rigs. No more than three drilling or redrilling rigs shall be present within the oil field at any one time.*

*c. Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan. Before the end of each calendar year, the operator shall develop and deliver to the director an annual drilling, redrilling, well abandonment, and well pad restoration plan, which shall describe all drilling, redrilling, well abandonment, and well pad restoration activities that may be conducted during the upcoming calendar year. Drilling and redrilling shall be scheduled to avoid over concentration of such activities in that year in any one area if located near a developed area. The operator may at any time submit to the director proposed amendments to the then current annual plan. No drilling, redrilling, or abandonment activity may be commenced unless it is described in a*

*current annual plan (or an amendment thereto) which has been approved by the director. The annual plan (and any amendments) shall be provided to the CAP for review and comment. All comments on the annual plan from the CAP shall be submitted to the director in writing, and, if timely submitted, will be considered as part of the director's review and approval. The director shall complete the review of the annual plan (and any amendments) within 45 days of receipt, and shall either approve the annual plan or provide the operator with a list of deficiencies. The annual plan shall comply with the provisions of this subsection, and shall include the following:*

- i. The maximum number of wells proposed to be drilled or redrilled;*
- ii. Approximate location of all wells proposed to be drilled or redrilled;*
- iii. Approximate location of all proposed new well pads, including their size and dimensions;*
- iv. Estimated target depth of all proposed wells and their estimated bottom hole locations;*
- v. A discussion of the steps that have been taken to maximize use of existing well pads, maximize use of redrilled wells, and maximize the consolidation of wells;*
- vi. Location of all proposed well abandonments, if known, in accordance with DOGGR integrity testing program of idle wells;*
- vii. Location of all well pads proposed to be abandoned and restored;*
- viii. A proposed schedule and phasing of the drilling, redrilling, well abandonment, well pad abandonment, and restoration activities;*
- ix. A discussion of the latest equipment and techniques that are proposed for use as part of the drilling and redrilling program to reduce environmental impacts; and*
- x. A topographic vertical profile showing proposed location of new wells that reflects local terrain conditions and that addresses the potential visibility of existing and proposed wells and other production facilities from residential and recreation areas.*

*d. Drill Rig Engines. All engines used for drilling and redrilling operations shall be operated by muffled internal-combustion engines or by electric motors.*

*e. Fire Safety Regulations. All drilling, redrilling, and reworking shall be in conformance with applicable fire and safety regulations.*

*f. New Technology. Proven reasonable and feasible technological improvements which are capable of reducing the environmental impacts of drilling and re-drilling shall be considered as they become, from time to time, available.*

*g. Derricks and Portable Masts. All derricks and portable masts used for drilling, re-drilling, and reworking shall meet the standards and specifications of the American Petroleum Institute as they presently exist or as may be amended.*

*h. Equipment Removal. All drilling and re-drilling equipment shall be removed from the site within 90 days following the completion of drilling or re-drilling activities unless the equipment is to be used at the oil field within five days for drilling or re-drilling operations.*

*i. Drill Site Conditions. All drilling sites shall be maintained in a neat and orderly fashion.*

*j. Belt Guards. Belt guards shall be required over all drive belts on drilling, re-drilling, and reworking equipment. Guarding shall be as required by Title 8 of the California Code of Regulations, section 6622, or as may be subsequently amended.*

**Summary of Complaints:**

The County has received complaints on several different issues that have the potential to be associated with drilling, re-drilling and reworking operations at the oil field. The complaints included issues with odor, noise, vibration, ground movement, and property damage. Discussion of these issues is included in the applicable analysis section of this Periodic Review.

**Summary of Issues Raised by the Public:**

Input from the public has been raised on a variety of issues regarding the drilling operations at the oil field. Comments have been received at Community Advisory Panel (CAP) meetings; comments have also been received on the annual drilling plans submitted by the applicant to date; as part of discussions for the revised requirements in the Settlement Agreement dated July 15, 2011, negotiated between concerned public parties, the County and PXP (now FM O&G); and in the input received by the County in comments solicited for the Periodic Review.

***Hydraulic Fracturing***

One of the main issues of concern regarding oil field operations is the well enhancement method of hydraulic fracturing. Public input on hydraulic fracturing has been received repeatedly during CAP meetings, in the electronic survey on the Periodic Review, and in emails and letters regarding the Periodic Review. Term 13 of the 2011 Settlement Agreement required the preparation of a hydraulic fracturing study to be completed by an independent third party consultant. In response to this requirement, the oil field operator commissioned a site-specific report on hydraulic fracturing for the oil field that included data from high-volume hydraulic fracturing tests at two wells at the oil field (Wells VIC1-330 and VIC1-635). The two hydraulic fracturing tests included seismic monitors and the presence of the ECC and County representatives. The study was completed in 2012 with a report issued October 12, 2012.

The study provided a number of findings on the potential impacts of hydraulic fracturing at the Inglewood Oil Field. Monitoring before, during, and after for ground movement and seismicity showed no detectable effect from the hydraulic fracturing activities or an increase in the potential for earthquakes. The report further concluded that the noise, vibration, and air emissions associated with the hydraulic fracturing tests were within the standards set by the CSD. Before and after monitoring of groundwater was also included during the tests and did not result in any impacts to groundwater resources. Finally, the report analyzed the impacts of the hydraulic fracturing tests against the conclusions of the community health assessment conducted by the County Department of Public Health and the EIR prepared for the CSD and concluded that the hydraulic fracturing tests did not contribute to additional health risks or impacts greater in significance than those analyzed in the EIR.

On September 20, 2013, California signed into law Senate Bill 4 (Pavley), a bill that regulates well stimulation techniques, including hydraulic fracturing. The bill directed DOGGR to adopt regulations that will require permits, groundwater monitoring, air quality monitoring, and notification of nearby property owners for wells using stimulation techniques such as hydraulic fracturing. The new law also required that well stimulation fluid vendors make certain disclosures regarding the chemical formulation of those fluids and that DOGGR prepare an EIR to analyze the impacts of hydraulic fracturing across the State. On November 15, 2013, DOGGR released draft regulations and the Notice of Preparation (NOP) of the EIR pursuant to Senate Bill 4 with a 60-day public comment period which closed on January 14, 2014. During the comment period, DOGGR hosted five public hearings around the State.

Hydraulic fracture well enhancement techniques are not in use at the oil field at this time nor are they proposed in the recently approved 2014 *Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan*. In addition, the Operator has committed to providing advance notice of any potential future hydraulic fracturing that could occur at the field.



Workover Rig Derrick with Pipe

***Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan***

The public has also provided input on the *Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan* that is submitted to the County on an annual basis as required by this provision. For the 2014 Plan, more information was requested regarding slant drilling paths and whether this drilling technique can result in a bottom hole location outside the boundaries of the CSD and potentially under a residence. This issue has been discussed at CAP meetings and the operator has confirmed that all drilling operations at the oil field stay within the boundaries defined by the Inglewood Oil Field. Another comment was made on the usefulness of the Subsection xi of the Plan, which requires preparation of topographic vertical profiles showing the proposed location of

new wells to address the potential visibility of the rigs. The commenter suggested eliminating this requirement altogether. Other public comments on the drilling Plan include requests for micro-seismicity monitoring during drilling operations and for the County to allow the CAP to play a more prominent role in the review and approval of the drilling plans.

Input has also been received on the drilling plans for the previous years since the adoption of the CSD. Comments on the 2009 Plan focused on requests for better detail on well, well pad, and well bore paths. Comments from both the County and the public noted that exact locations of these well characteristics are necessary to determine compliance with the CSD; prevent drilling in setbacks or outside the boundaries of the CSD, and to avoid an overconcentration of rigs in one area. As part of the approval process, the County plotted the well data into a GIS mapping system and determined the proposed well locations were in compliance with the provisions of the CSD. The public also requested that the plans be provided at an earlier date to allow for more review time.

Comments on the 2010 Plan expressed similar concerns regarding the location, schedule, and number of wells in a given area and the potential to concentrate noise and other impacts from drilling on one residential area. Several comments noted that the County should be directing the Operator to direct drilling efforts toward the center of the field to allow for the perimeter edges to be restored and returned, over time, to open space. In support of maximizing the drilling activity in the middle of the field several comments requested that the Operator be required to abandon more wells and well pads along the edges of the oil field. However, it must be noted that this is not a requirement of the CSD. Input was also received that the Plan should provide more detail on how the significance of the visual impact of drilling rigs was determined and mitigated.



Drill Rig

The 2011 Plan comments also requested more detail on the location and schedule of the proposed wells. Concern from the public was documented on the potential for the over-concentration of wells in one area and the associated noise and visual impacts. Both the County and the public requested that the Plan reflect and discuss complaints from the public and the results of the investigation of those complaints. The public also expressed concerns that both the rate of abandonment of wells and the progress of the landscaping effort were not meeting the requirements of the CSD. The public noted the similar concern that the application and installation of the new flare for the gas plant was not consistent with the schedule required by the CSD. The review and subsequent approval of the 2011 Plan confirmed Operator compliance with the progress of those CSD provisions.



Comments on the 2012 Plan made similar requests as those on the previous drilling plans for consolidation of wells in the center of the oil field and abandonment of more wells with the focus on the perimeter sections of the field. In response to these requests, the County noted that the CSD does not require the Operator to “shrink” the oil field operations into the center of the field and that the proposed drilling locations were in compliance with the CSD. Comments were also noted that the proposed number of wells and request for bonus wells was not adequately documented; however, the County determined the information in the Plan was consistent with the applicable CSD requirements. The public also requested more information on the geological review of the drilling Plan, production zone information, and data on the nodular shale zones. The County requested the information where required by the CSD, however, much of the requested information is not required by the ordinance. Other comments requested that the gas buster/flare system be required for all drilling sites and concerns regarding hydraulic fracturing well enhancement techniques.

Comments on the 2013 Plan included specific questions about well locations and the information required to be included in the Plan to document compliance with the CSD. The 2011 Settlement Agreement requires the Plan to provide additional information on certain well types and for certain well depths and locations. Upon review of the Plan, the County determined the information submitted was, as revised, in compliance with the requirements of the CSD and Settlement Agreement. Comments on the 2013 Plan were also received from the Regional Water Quality Control Board (RWQCB) including a request that the Plan provide more information on abandoned wells and the ground water monitoring well network. Upon review, the County determined that the Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan provision does not require data on abandoned wells noting that annual reports on vapor testing of abandoned wells is submitted annually to DOGGR. The County also noted that the groundwater well monitoring network was approved by the RWQCB. See the analysis and recommendation for Provision 19, *Groundwater Monitoring*, for more detail. Additional comments on the 2013 Plan requested that the document provide more detail on new technologies for drilling rigs such as electric and natural gas powered drill rigs.

### ***The 2011 Settlement Agreement***

The Settlement Agreement resulted in additional documentation requirements for wells that involve slant drilling and for wells located in certain mid-zone and shallow depth locations. Operations that meet the criteria for these types of wells must be detailed in a supplemental review section of the annual drilling Plan. Other requirements included revising the limit on the number of drilling rigs, as discussed below, clean technology for drilling equipment, and increasing the length of cement well plugs. Well plugs are discussed in the analysis of Provision E.33, *Well and Well Pad Abandonment*.

Additional comments regarding the general safety, environmental impacts, and health impacts to the public from oil drilling activities were noted in the comments submitted on the Periodic Review.

**Analysis of Compliance and Effectiveness:**

Subsection E.26.a requires that all well activities related to drilling, re-drilling, and reworking operations meet the applicable DOGGR regulations. Drilling, re-drilling, and reworking and operations at the oil field are regularly inspected by DOGGR to ensure compliance with these State regulations. The DOGGR inspections often include specific review for the drilling rig blow out preventer (BOP) system. The Operator is required to notify DOGGR to witness BOP function for all permitted new or re-drilled production and injection wells.

As noted above, the Settlement Agreement revised the provision subsection regarding the allowable number of drilling and re-drilling rigs at the oil field. The original provision listed a maximum of three of these rig types; the Settlement Agreement limits that number to two. Current and historic operations since the applicability of the CSD have had a single drilling rig onsite; however, the 2014 drilling Plan has a drilling schedule set up for two such rigs. At no time since the adoption of the CSD has the oil field had three drilling and re-drilling rigs operating at the same time.

The *Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan* has been submitted to the County on an annual basis as required. The Plan is reviewed and approved prior to the initiation of drilling activities for the given year. The Plans have also been provided to the CAP for comment consistent with this provision. County review of the plans includes consideration of input received from the CAP. These annual drilling plans must contain the information required under subsections E.26.c.i through E.26.c.x to be approved by the County. Annual plans have been amended as necessary, as allowed by subsection E.26.c, to reflect changes that may occur during the drilling year. The annual Plan for the calendar year 2014 has been approved by the County. The plans are available at the Inglewood Oil Field web site at <http://www.inglewoodoilfield.com>.

Drill rig engines used at the oil field are properly muffled as required. Fire and safety regulations and orderly drill site conditions are followed at all drilling, re-drilling, reworking sites in the oil field; compliance for these requirements is checked periodically during DOGGR and County ECC inspections. As noted above the Operator is required to notify DOGGR for specific permitted well operations. The County inspections and permits document compliance with the rig standards for derricks, portable masts and belt guards as required under subsections E.26.g and E.26.j. New technology for reducing the environmental impacts of drilling and re-drilling is discussed in the annual drilling plans submitted to the County for review prior to each drilling activity year. Natural gas-powered drill rigs have been discussed in recent drilling plans but this technology has not been proven feasible to date due to the lack of available rigs using this technology. Currently, only one rig in California is



Drill Rig Pipe Rack and "V" Door Noise Dampening Rubber Surfaces

operated on natural gas. However, that drill rig is committed to other operators throughout California and is not available to FM O&G. In addition, the gas rig is significantly taller and would have a bigger footprint than the rig currently in use. Air emissions were also found to have a negligible benefit when compared with using the conventional rigs with the CSD mandated emission controls.

Because the drilling, re-drilling, and reworking rigs at the oil field are provided and operated by sub-contractors to FM O&G, these rigs are not idle and are removed from the oil field pursuant to subsection E.26.h if no longer scheduled for use on the oil field.

The number of wells drilled and re-drilled is limited on an annual and overall project basis by the conditions of Provision H.1, *Director's Review Required*. The drilling limits prescribed in the CSD were revised by the Settlement Agreement; please see the analysis for Provision H.1 for a discussion on the well limits for the oil field.

The provision is considered to be fully effective at this time, no further analysis is recommended.

**New Technology:**

Subsection E.26.f requires that reasonable and feasible technological improvements capable of reducing the environmental impacts of drilling and re-drilling activities be considered as they become available. The *Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan* includes a discussion on applicable new technologies with this Plan submitted to the County for review. See discussion for Provision E.2 for information on CARB oil rig engine technology and emissions requirements.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended, and no changes to implementation are recommended. However, in consideration of a commenter who suggested elimination of the requirements of subsection c.x and the substantial costs associated with the preparation of the topographic vertical profiles, the preparers recommend considering removing the subject figures/maps from the Annual Drilling Plan until the information is deemed useful for inclusion in future plans.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

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***E.27 Processing Operations. The operator shall comply with the following provisions:***

*a. Limits on Processing Operations. Unless otherwise expressly required by DOGGR, the only processing operations permitted at the well site shall be the dehydration of oil and gas produced from the well; the storage, handling, recycling, and transportation of such materials; and those processing operations required for water injection purposes.*

*b. Refining. No refining shall be conducted within the oil field.*

*c. Well Pump Motors. All well pumping units shall be operated by electric motors.*

*d. Well Pumps. Downhole submersible pumps and low-profile pumping units for production wells must be used wherever feasible.*

*e. Removal by Pipeline Only. All oil, gas, and other hydrocarbons produced from any well in the oil field shall be shipped and transported through pipelines, except in case of an emergency or when access to a pipeline becomes unavailable. Excluded from this requirement are propane and other related natural gas liquids that are in amounts in excess of what can be blended into the pipeline. Should any pipeline through which oil or gas is currently transported become unavailable for the safe transportation of said products due to maintenance problems with the pipeline, or lack of sufficient capacity within the pipeline to handle the volume of oil and gas needing transportation, or because the owner or operator of such pipeline elects to discontinue transporting oil or gas through such pipeline, then the operator shall within 180 days of the date the existing pipeline becomes unavailable, seek to acquire a private right of way or easement, or shall file an application for a right of way, easement, encroachment permit, or franchise for the construction of a replacement pipeline and shall diligently prosecute such application until such pipeline is completed. During any emergency situation, or during such time as any existing pipeline becomes unsafe or unavailable, oil and gas may be transported by truck until the emergency situation is resolved or until a replacement pipeline shall be permitted and constructed in compliance with all applicable laws and regulations.*

*f. Pipelines. The operator shall comply with the following provisions:*

*i. New pipelines that remove oil or gas from the oil field shall be buried below the surface of the ground;*

*ii. All pipelines which are not enclosed within a fence shall be placed underground or covered with materials approved by the fire chief. Said covers shall be maintained in a neat, orderly, and secure manner;*

*iii. Any and all water or brine produced during pipeline construction shall either be injected in accordance with DOGGR requirements, or disposed of in accordance with other local, State or federal regulations;*

*iv. New pipeline corridors shall be consolidated with existing pipelines or electrical transmission corridors where feasible; and*

*v. Upon completion of pipeline construction, the site shall be restored to the approximate previous grade and condition.*

*g. Active Pipeline Plot Plan. The operator shall submit to the fire chief a plot Plan depicting the approximate location of all active pipelines regulated by the United States Department of Transportation or California State Fire Marshall owned by the operator*

*that are located outside the outer boundary line, including waste water, and trunk and gathering lines to transport oil or petroleum products. The plot Plan shall be submitted within 30 days of the installation of any new pipelines or the relocation of an existing pipeline.*

*h. Machinery Enclosures. The operator shall maintain enclosures around machinery with moving parts consisting of a fence, screening, or housing. Said enclosures shall be installed in compliance with Section 11.16.020, Title 11 of the County Code.*

*i. Opening Protections. The operator shall cap, close, or protect the openings in all oil wells, test holes, and similar excavation in compliance with Section 11.54.010, Title 11, of the County Code.*

**Summary of Complaints:**

No complaints associated with the requirements on the processing operations at Inglewood Oil Field have been received by the County.

**Summary of Issues Raised by the Public:**

No issues specific to the requirements on the processing operations at the oil field have been raised by the public.

**Analysis of Compliance and Effectiveness:**

The processing operations at Inglewood Oil Field are in compliance with the requirements of this provision. The only processing occurring at the oil field is associated with the dehydration of oil and gas; the storage, handling, recycling, and transportation of those materials; and water injection operations. The oil field does not need to process hydrogen sulfide or other impurities prior to transportation to offsite refineries.

All well pump motors at the oil field are powered electrically; the field does not have any internal combustion engine well pump motors. Down hole submersible pumps require specific engineering and geologic conditions to be feasible. Specifically, the amount of sand in the formation is the primary determining factor in the use of submersible pumps because high levels of sand cause significant deterioration of the pump mechanisms. To date approximately 50 wells at the oil field have been retrofitted with submersible pump technology. The oil field does not currently have any low profile pumping units in operation. All oil, gas, and other hydrocarbons produced in the oil field are shipped and transported via pipelines and all natural gas liquids are blended into the oil and thus transported by pipeline. Trucking offsite of oil or gas has occurred once since the adoption of the CSD due to a leak with an offsite oil pipeline operated by another company. Production was curtailed and oil was trucked offsite from September 11 to September 14, 2013 to allow for repair of the oil pipeline.

No new pipelines that transport oil or gas from the oil field have been constructed since the adoption of the CSD. As noted in the discussion regarding CSD Provision E.20 regarding oil field fencing, the oil field is completely fenced in with chain link fencing that

meets the DOGGR requirements, thus all oil field pipelines are also enclosed by a fence.

All water or brine generated at the oil field is injected in accordance with DOGGR requirements, new injection wells are subject to review through the annual drilling Plan submittal to the County and the DOGGR Area of Review (AOR) process. Pipeline construction within the oil field is consolidated to the maximum extent feasible in existing pipeline routes and corridors. Pipeline corridors are returned to pre-existing grade and condition upon completion of construction consistent with the Oil Field Master Grading Plan. The Active Pipeline Plot Plan was submitted to the Fire Department on December 9, 2009 and has not been required to be updated to date.

Machinery enclosures and openings associated with wells, test holes, and excavations are inspected by oil field operators during daily rounds. This equipment is also reviewed annually during safety audits performed by the operator and periodically inspected by the County ECC. The equipment at the oil field complies with the referenced County code requirements under Title 11 for health and safety requirements for hazards. Maintenance, safety inspections, and safety audits of this equipment are implemented consistent with the Safety, Inspection, Maintenance, and Quality Assurance Program (SIMQAP) as required by CSD Provision F.3.

The provision is considered to be fully effective at this time, no further analysis is recommended.

**New Technology:**

Any new pipelines that transport oil or gas offsite from the oil field would require permits from local and State regulatory agencies. The assessment and potential implementation of new technology in pipelines or pipeline construction would be part of the review and approval process of the pipeline permit applications. The machinery enclosure and opening protection requirements outlined in E.27.h and E.27.i above; are linked to County Code requirements, updates to those requirements are therefore incorporated by reference to the CSD.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

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***E.28 Well Reworking Operations.*** *The operator shall comply with the following provisions:*

*a. DOGGR Regulations.* *The operator shall comply with all DOGGR regulations related to well reworking operations.*

*b. Number of Reworking Rigs. No more than eight reworking rigs shall be present within the oil field at any one time, unless an emergency condition requires additional Reworking rigs. This does not include equipment used for well maintenance or well abandonment.*

*c. Hours of Operation. With exception of emergencies, well reworking operations shall not be allowed after 7:00 p.m. or before 7:00 a.m., nor on Sundays or legal holidays.*

*d. Specifications. Reworking rigs shall meet the standards and specifications of the American Petroleum Institute.*

*e. Equipment Removal. Reworking rigs shall be removed from the oil field within seven days following the completion of reworking operations unless such rig will be used on another well at the oil field within five days.*

**Summary of Complaints:**

The County has received complaints regarding noise associated with rig operations at the oil field. The most common complaint is the noise from pipe sections banging against each other. The exact number of noise complaints directly linked to well reworking operations is not clear, but most of the complaints from pipe banging noise has been determined to be from maintenance rig operation. Review of the complaint logs indicates three noise complaints associated with well reworking operations with one confirmed and two unconfirmed.

**Summary of Issues Raised by the Public:**

In addition to the noise complaints associated with the operation of rigs at the oil field, the public has also noted the observation of too many rigs in one area, which resulted in two public complaints in 2013. This issue has been raised by the public at Community Advisory Panel (CAP) meetings; however, there is no specific CSD condition requiring that rig operations associated with reworking efforts be spread throughout the field to minimize the impact from the rig activities.

**Analysis of Compliance and Effectiveness:**

Wells associated with reworking operations require a permit from DOGGR and thus must meet the applicable well reworking requirements. It should be noted that these well activities are not part of the *Annual Drilling, Redrilling, Well Abandonment, and Well Restoration Plan*; the permitting is a separate process completed directly with DOGGR with permits copied to the County. Compliance with the number of reworking rigs at the oil field is documented by weekly email updates to the County listing the number of reworking rigs and the well location of the work. This data is confirmed by periodic County ECC inspections.

Standard policy for the operation of reworking rigs operation is daylight hours only. Operation during non-daylight hours only occurs when necessary to complete a critical task or for an emergency situation. Reworking rigs are not operated outside 7:00 am to 7:00 pm or on Sundays or legal holidays consistent with the CSD requirements. The reworking rigs at the oil field are provided and operated by a sub-contractor. The rigs

must have a valid Department of Motor Vehicles license and meet the specifications of the American Petroleum Institute (API) to operate in California. The reworking rigs are removed from the field to be used elsewhere by the sub-contractor unless scheduled for use at another well in the oil field.

The provision is considered to be effective at this time, no further analysis is recommended.

**New Technology:**

As noted above, the well reworking rigs are required to meet the standards and specifications of the API. Therefore as new technologies are developed and adopted by the API, those technologies would be consequently required by the CSD. See discussion for Provision E.2 for information on CARB oil rig engine technology and emissions requirements.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended; however, in response to the recent complaints of overconcentration of rigs in a given area (along with the presence of the drill rig), it is recommended that the Operator facilitate better coordination when scheduling reworking and the other types of rigs at the oil field to avoid concentrating too many rigs in one area. Since this has only been reported as an issue in two separate occasions, additional vigilance is recommended to the Operator and additional oversight is suggested to the ECC. No other changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

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***E.29 Tanks. The operator shall comply with the following provisions:***

*a. New Tank Specifications. All new tanks and appurtenances shall be designed, constructed, installed, and maintained in accordance with current County Fire Code, American Petroleum Institute, DOGGR, California Division of Industrial Safety, Environmental Protection Agency Standards, applicable provisions of Title 14 of the California Code of Regulations section 1774, and applicable CalARP Program requirements.*

*b. Setbacks. No new storage Tank, excluding a replacement tank, shall be constructed closer than 500 feet from any developed area, or closer than 200 feet from a public road. No building shall be constructed within 50 feet of any oil storage tank.*

*c. Vapor Recovery. Oil, wash, and produced water tanks shall be vapor tight and shall be equipped with a vapor recovery system.*

*d. Specifications for New Tank Piping, Valves, Fittings, and Connections. All new tank piping, valves, fittings, and connections including normal and emergency relief venting,*



shall be installed and maintained in accordance with current American Petroleum Institute standards to the satisfaction of SCAQMD and DOGGR.

e. *Detection of Tank Bottom Leaks.* The operator shall design, implement, and comply with a program, approved by the fire chief, for controlling and detecting tank bottom leaks on all tanks at the oil field. The operator may use a combination of methods including but not limited to diversion walls, dikes, tank foundations of concrete or gravel, and a tank bottom leak detection system in compliance with Title 14 of the California Code and Regulations section 1773, or subsequently enacted State regulations regarding tank bottom leaks.

**Summary of Complaints:**

No complaints associated with the tanks at the Inglewood Oil Field have been received by the County.

**Summary of Issues Raised by the Public:**

No issues regarding the tanks for the Inglewood Oil Field have been raised by the public.

**Analysis of Compliance and Effectiveness:**

Four new tanks have been constructed since the adoption of the CSD. All four tanks contain oil and water and are referred to as wash tanks, and all four were sized at 5,000 barrels capacity. Construction of the new tanks required County building and land use permits and a South Coast Air Quality Management permit for the vapor recovery system. The permitting of these tanks included the tank piping, valves, fittings, and connections. Thus, the tanks were built pursuant to the agency requirements for new tank specifications outlined in E.29.a and E29.d above.



Tanks Signage and Paint

Of the four tanks constructed, one tank located at the LAI Last Chance tank battery was built within the setback criteria described in Provision E.29.b. However, the tank replaced an existing tank in the same location and therefore the construction was consistent with the CSD requirement. No buildings have been constructed within 50 feet of an oil tank. All oil, wash, and produced water tanks at the Inglewood Oil Field are vapor tight and are equipped with a vapor recovery system; this requirement is enforced and documented by annual and periodic inspections by the South Coast Air Quality Management District and by periodic ECC inspections.

As outlined in the Safety, Inspection, Maintenance, and Quality Assurance Program (SIMQAP) required under Provision F.3, all tanks at the Inglewood Oil Field have a program to detect tank bottom leaks. The SIMQAP and leak detection program are required to be reviewed and approved for compliance with Title 14 of the California Code of Regulations and other State regulations. The leak detection for all tanks at the

oil field consists of either direct view monitoring of the exterior surface and bottom or by the use of tank foundations of either concrete or gravel. A Tank Leak Detection and Containment Plan was approved by County Fire on 2/18/10. The *Annual Well Increase Evaluation, December 2011*, also confirmed that the required tank leak detection measures are in place.

The provision is considered to be fully effective at this time; no further analysis is recommended.

**New Technology:**

All new tanks require permits from County Departments of Public Works and Regional Planning and from the South Coast Air Quality Management District. New technologies in the construction and monitoring of oil field tanks would be part of the review and approval process for the permitting of those tanks. Therefore, any new technologies applicable to oil field tanks can be required pursuant to the subject agency permitting requirements and would be consequently incorporated into the CSD by reference.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

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***E.30 Well Production and Reporting.*** *The operator shall deliver annual production reports to the director and the fire chief. The reports shall provide the following information:*

- a. A copy of all DOGGR Forms 110 and 11 OB submitted during the previous 12 months.*
- b. Number and mapped location of wells drilled or redrilled, including well identification numbers.*
- c. Number and mapped location of water injection wells, including well identification numbers.*
- d. Number and mapped location of idled wells, including well identification numbers and the date each well was idled.*
- e. Number and mapped location of abandoned wells, including date each well was abandoned and/or re-abandoned.*
- f. Any additional information requested by the director or the fire chief.*

**Summary of Complaints:**

No complaints regarding the well reports required by this provision have been received by the County.

**Summary of Issues Raised by the Public:**

The public has not raised any issues specific to this CSD requirement; the public does provide comment on the oil field wells through the public outreach provisions of the CSD by commenting on the *Annual Drilling, Redrilling, Well Abandonment and Well Restoration Plan*. Community Advisory Panel (CAP) members have requested to have information on the start and end date for the drilling of each well. Information summarizing the start and end dates of each well drilled for the previous quarter has been recently provided verbally by the County at the CAP meetings.

**Analysis of Compliance and Effectiveness:**

The reports requested by this provision have been submitted annually to the County and Fire Chief as required. The forms listed under E.30.a are submitted to DOGGR monthly and are compiled for the annual submittal to the County. The County submittal consists of three document packets; Well and Production Report Maps, Well and Production Report Production Forms, and Well and Production Report Injection Forms. These documents are available at the oil field web site at <http://www.inglewoodoilfield.com>.

Projected location of wells drilled or redrilled is provided in the Annual Drilling Plan submitted according to CSD Provision E.26. The provision is considered to be fully effective at this time and no further analysis is recommended.

**New Technology:**

This CSD provision is not directly linked to technology; however, as new technologies in well reporting are implemented by DOGGR and added to the reporting forms, the new reporting information would be incorporated into the CSD provision by reference.

**Recommendations to Changes in Implementation:**

The provision has been implemented and is considered to be fully effective at this time; therefore, no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The provision considered to be fully effective at this time, and no changes to the CSD language are recommended.

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***E.31 Idle Well Testing and Maintenance.*** *The operator shall comply with Title 14 of the California Code of Regulations section 1723.9 regarding testing and maintenance of idle wells, or subsequently enacted State regulations regarding testing and maintenance of idle wells. The operator shall carry out all additional tests, remedial operations, and mitigation measures required by DOGGR if any idle wells do not meet the test standards.*

**Summary of Complaints:**

This provision is administrated and regulated by DOGGR. The County has not received any complaints or comments on idle well testing or maintenance.

**Summary of Issues Raised by the Public:**

The public has not raised any issues specific to this CSD requirement; however, wells at the oil field are discussed in the *Annual Drilling, Redrilling, Well Abandonment and Well Restoration Plan* and the public has the opportunity to provide comments on the Plan through the public outreach provisions of the CSD.

**Analysis of Compliance and Effectiveness:**

Title 14 of the California Code of Regulations section 1723.9 provides testing and maintenance requirements that apply to wells that have not produced oil or natural gas or been used for fluid injection for a continuous six-month period during any consecutive five-year period. The testing includes the determination of the fluid level of the well and may include other diagnostic tests as required by DOGGR. PXP and now FMO&G complete the required testing and maintenance pursuant to the DOGGR and submit the results to DOGGR pursuant to the regulations in an annual report.

The provision is considered to be fully effective at this time and no further analysis is recommended.

**New Technology:**

This CSD provision is not directly linked to technology; however, the requirement language is linked to DOGGR regulations. As new technology regarding idle well testing and maintenance is developed and added to the State regulations, those requirements would be incorporated into the CSD provision by reference.

**Recommendations to Changes in Implementation:**

The provision has been implemented and is considered to be fully effective at this time, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The provision considered to be fully effective at this time, and no changes to the CSD language are recommended.

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***E.32 Abandoned Well Testing.*** *The operator shall conduct annual hydrocarbon vapor testing of areas within the oil field that contain abandoned wells. The testing shall be done using a soil gas vapor probe, or another method approved by the director. The results of the testing shall be submitted to the director and DOGGR on an annual basis. Abandoned wells that are found to be leaking hydrocarbons that could affect health and safety shall be reported to the director and DOGGR within 24 hours of the abandoned well test. If directed by DOGGR, the operator shall re-abandon the well in accordance with DOGGR rules and regulations. If the test results for an abandoned well area are at or below the background levels for two consecutive years that area shall thereafter be tested every five years.*

**Summary of Complaints:**

Abandoned well area testing has occurred annually since the adoption of the CSD as required; no complaints associated with the testing have been received by the County.

**Summary of Issues Raised by the Public:**

No issues regarding the abandoned well testing have been raised by the public. However, as part of the Settlement Agreement dated July 15, 2011 between concerned public parties, the County and PXP, the length of cement plugs used in the well abandonment process at the Inglewood Oil Field was increased from the 25 feet required by DOGGR to 150 feet.

**Analysis of Compliance and Effectiveness:**

Abandoned well area hydrocarbon vapor testing has been completed annually by a third-party consultant since the adoption the CSD. Results of the sampling were compared to the regulations and requirements of the City of Inglewood, LA County Department of Public Works, LA County Fire Department, the California Code, and the South Coast Air Quality Management District in reports submitted to LA County and DOGGR. The reports completed to date, 2009 through 2013 inclusive and summarized below, concluded that there is no evidence of leaking wells, pipelines or natural seepage from abandoned well areas at the oil field.

In 2009, 96 soil samples were taken at a depth of four feet with the samples analyzed for hydrocarbons and hydrogen sulfide. The results indicated that all areas where hydrocarbons were detected had values below regulatory concerns. Hydrogen sulfide was not detected in any of the soil samples. The testing in 2010 included 96 soil samples for hydrocarbons and hydrogen sulfide; none of the 2010 soil samples contained hydrocarbons above regulatory thresholds and hydrogen sulfide was not detected. Additional sampling occurred in 2010 at the location of the 12 highest results for hydrocarbons; surface air testing for methane was completed using an organic vapor analyzer and methane was not detected at any of the 12 air sampling locations. For the 2011 sampling program, 31 soil samples were taken with no results above any regulatory threshold of concern for hydrocarbons and hydrogen sulfide was not detected. The 2012 well area hydrocarbon sampling program included 24 soil samples with the highest result measured significantly below the levels of possible concern. Consistent with previous year sampling, hydrogen sulfide was not detected. The sampling program in 2013 included sampling at 11 locations, and all results were below the levels of concern.

The annual abandoned well area hydrocarbon vapor testing program to date has concluded that there is no evidence of leaking wells, pipelines or natural seepage. The reports further conclude that the low levels of hydrocarbons detected are likely the result of natural degradation of crude oil in the near surface soil resulting from historic oil operations. The Annual Abandoned Well Testing reports are available at the Inglewood Oil Field web site at <http://www.inglewoodoilfield.com>.

Finally, all wells abandoned since the settlement agreement was adopted have exceeded the 150 feet length of cement plugs as verified by the County. The annual

abandoned well area hydrocarbon vapor testing has been completed as required. The provision is considered to be fully effective at this time and no further analysis is recommended.

**New Technology:**

The annual abandoned well area hydrocarbon vapor testing is performed by a third-party consultant consistent with accepted sampling procedures and lab analysis per the American Society for Testing and Materials (ASTM) D1945 analytical techniques. As new techniques in soil testing and analysis are developed and implemented, the testing program will be modified accordingly.

**Recommendations to Changes in Implementation:**

The required annual abandoned well area hydrocarbon vapor testing has been completed as required; no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The provision has been completed as required to date and no abandoned wells have been found to be leaking hydrocarbons that could affect health and safety. No wells have been required by DOGGR to be re-abandoned due to leaking hydrocarbons. Therefore, no changes to the CSD language are recommended.

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***E.33 Well and Well Pad Abandonment.*** *If DOGGR orders the operator to plug and abandon any wells on the oil field, the operator shall deliver to the fire department, on a timely basis, all notices of intent to plug and abandon a well that the operator files with DOGGR and shall commence promptly and proceed diligently with the plugging and abandonment operations in accordance with DOGGR rules and regulations and the terms of the DOGGR permit to plug and abandon the well. Well abandonment may commence once all necessary permits and approvals are obtained. If the well pad associated with the abandoned well does not contain other production, injection, or idle wells, and will not be used for future drilling, then the operator shall promptly abandon the well pad consistent with the following provisions:*

*a. Closure of Sumps.* *The operator shall clean out all sumps, cellars, and ditches, and level and fill all sumps and depressions pursuant to DOGGR requirements. If sumps are lined with concrete, bottoms and walls shall be broken up and removed. Sumps shall be closed in accordance with Regional Water Quality Control Board and California Department of Toxic Substances Control requirements.*

*b. Well Pad Site Cleanup.* *The operator shall leave the site entirely free of oil, rotary mud, oil-soaked earth, asphalt, tar, concrete, litter, debris, and other substances to the satisfaction of DOGGR and in compliance with federal requirements.*

*c. Contaminated Materials.* *All contaminated soils and materials within the well pad boundaries shall be removed and treated or disposed of in accordance with all local, county, State, and federal regulations.*

*d. Well Pad Revegetation. The Well pad shall be revegetated following the requirement of the native habitat restoration Plan.*

**Summary of Complaints:**

This provision has not been implemented by DOGGR to date and the County has not received any complaints on the requirement to date.

**Summary of Issues Raised by the Public:**

There have been no issues raised by the public specific to this provision and DOGGR has not ordered any wells to be plugged or abandoned pursuant to this requirement. Wells at the oil field associated with plugging and abandonment activities are discussed in the *Annual Drilling, Redrilling, Well Abandonment and Well Restoration Plan* and may be subject to DOGGR Area of Review (AOR) requirements as discussed below. The public has the opportunity to provide comments on the *Annual Drilling, Redrilling, Well Abandonment and Well Restoration Plan* through the public outreach provisions of the CSD.

While no public input was received on this CSD provision, the terms of the Settlement Agreement negotiated between concerned public parties, the County and PXP (now FM O&G) included additional requirements to the CSD regarding well plugs. The agreement language increases the length of the cement surface plug from the 25 foot DOGGR requirement to 150 feet. The applicable language from the settlement agreement is listed below.

*Well Plugs. DOGGR requires oil field operators to utilize a minimum 25-foot cement surface plug at the top of a well when abandoning any such well pursuant to Title 14 of the California Code of Regulations section 1723.5. To augment this requirement, for all wells abandoned at the Oil Field from the date of this Agreement, PXP shall utilize a total of 150-foot cement surface plug.*

**Analysis of Compliance and Effectiveness:**

As noted above, DOGGR has not implemented this provision to require FM O&G to plug and abandon any wells to date. Wells voluntarily scheduled for plugging and abandonment are included in the *Annual Drilling, Redrilling, Well Abandonment and Well Restoration Plan* subject to DOGGR and the County review and approval. In addition, idle or previously plugged and abandoned wells are subject to the DOGGR Area of Review (AOR) process which is implemented when a new injection well is proposed as summarized below.

In California, injection wells associated with oil and natural gas production operations (Class II injection wells) are regulated by DOGGR pursuant to their Underground Injection Control (UIC) Program. The program is coordinated with the EPA for regulation of Class II injection wells under the federal Safe Drinking Water Act. When injection wells are included in the *Annual Drilling, Redrilling, Well Abandonment and Well Restoration Plan*, DOGGR implements the AOR process for the area with the potential to be affected by the proposed injection well. DOGGR defines the AOR surrounding a proposed injection well bore as a minimum one quarter mile radius, with

local geology and reservoir characteristics providing other input to the determination of the size of an AOR. The Inglewood oil field is divided into 15 AOR sections. The AOR process analyzes all wells, including idle and abandoned wells, in the area of a proposed new injection well to ensure the wells will not cause damage to life, health, property, or natural resources.

The provision language also includes requirements for closure of sumps, well pad clean up, contaminated materials, and well pad revegetation. As discussed for CSD *E.15 Sumps*, the Inglewood Oil Field does not contain any sumps and sumps are no longer used at the oil field. Existing well pads have been cleaned up but are not scheduled for abandonment or restoration because FM O&G standard practice is to re-use the well pad sites as feasible to avoid the impact of developing new well pad areas.

The provisions requiring abandonment of wells, closure of sumps and well pads cleanup have not been activated to date, however, the intent of the requirement is met through other CSD and DOGGR regulations, no further analysis is recommended.

**New Technology:**

This CSD provision is not directly linked to technology; however, the requirement language is linked to DOGGR regulations. As new technology or requirements regarding plugging and abandonment of wells are developed and added to the State regulations, those requirements would be incorporated into the CSD provision by reference.

**Recommendations to Changes in Implementation:**

The provision requirement has not been implemented to date; however, the intent of the requirement is accomplished through DOGGR requirements other CSD provisions. No further analysis is recommended.

**Recommendations to Changes in CSD Language:**

The provision requirement has not been activated to date and the oil field wells are reviewed annually through DOGGR requirements and other CSD provisions. There is the potential for DOGGR to require the plugging and abandonment of a well that is not part of an annual Plan or associated with an injection well project in the future. Therefore, the requirement should remain and no changes to the CSD language are recommended at this time.

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***E.34 County Request for Review of Well Status.*** *The director may periodically review the status of the operator's wells and submit to DOGGR a list of wells the director believes should be plugged and abandoned as specified in Public Resources Code section 3206.5 or any subsequently enacted State law related to a local jurisdiction's right to request State-agency review of idle wells.*

**Summary of Complaints:**

There have been no complaints regarding the County's discretion to request DOGGR review of wells as provided for in this provision.



**Summary of Issues Raised by the Public:**

There have been no issues raised by the public specific to County's discretion to request DOGGR review of wells as provided for in this requirement. The public has the opportunity to provide comments on oil field documents such as compliance reports, plans, audits, and studies including the *Annual Drilling, Redrilling, Well Abandonment and Well Restoration Plan*.

**Analysis of Compliance and Effectiveness:**

The County has not requested that DOGGR require the Operator to plug or abandon any wells pursuant to this provision to date; therefore, the requirement has not been activated to date. Well status is reviewed by the County through other provisions of the CSD such as the *Well Abandonment and Well Restoration Plan* which must be approved prior to the initiation of each year's drilling program. CSD provision E.32, *Abandoned Well Testing*, requires abandoned well areas to be tested for hydrocarbon contamination and these reports be submitted to the County and DOGGR on an annual basis. If the County discovers any anomalies regarding the well testing, the County can request that DOGGR require the Operator to abandon or plug a well that could be emitting hydrocarbons. As stated above, this has not been necessary to date.

The provision requirement has not been activated to date and no further analysis is recommended.

**New Technology:**

This CSD provision is not directly linked to technology; however, the requirement language does include the associated State law, Public Resources Code section 3206.5. Should the State law be revised, operational status of wells, or the plugging and abandonment schedules of wells based on new technology, the new law would be incorporated into the CSD provision by reference.

**Recommendations to Changes in Implementation:**

The provision requirement has not been implemented to date and County review of the status of wells is accomplished through other CSD provisions. No further analysis is recommended.

**Recommendations to Changes in CSD Language:**

The provision requirement has not been activated to date and well status is reviewed annually through other CSD provisions. There is the potential for the need to review a well or wells that may not be part the *Annual Drilling, Redrilling, Well Abandonment and Well Restoration Plan* or other required plans. Therefore, the requirement should remain and no changes to the CSD language are recommended at this time.

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***E.35 Reduced Throughput Triggering Review.*** *When oil or gas throughput is less than 630 barrels per day, the director shall conduct a public hearing to determine if shut down of the oil field or other actions are appropriate.*

**Summary of Complaints:**

This provision is intended to be implemented at or near the end of the Inglewood Oil Field's project life to determine if the oil production at the site remains economically viable and whether abandonment of the oil field is merited. The oil field has not reached the production levels that trigger this review and this provision has not been activated to date. The County has not received any complaints on the requirement.

**Summary of Issues Raised by the Public:**

The public, specifically the parties involved in the Settlement Agreement dated July 15, 2011, requested additional language be added to the requirement. The Settlement Agreement details additional requirements to the CSD as negotiated between the concerned public parties, the County and PXP (now FM O&G). The additional language from the Settlement Agreement regarding *CSD E.35, Reduced Throughput Triggering a Review* is listed below:

*CSD Review Based On Reduced Production. When production drops to three percent of the estimated peak production of 21,000 barrels of oil per day, the County will review the CSD to consider whether modifications or closure of the Oil Field is necessary or appropriate or at such earlier date as the County determines appropriate.*

**Analysis of Compliance and Effectiveness:**

As noted above, the intent of this provision is to assist in the determination of the end of the project life of the oil field and therefore has not been activated to date. The provision requirement was augmented by additional language documented in the 2011 Settlement Agreement dated July 15, 2011, which provided for County review prior to the production throughput trigger of 3 percent of the estimated peak production to date of 21,000 barrels. The original CSD language required oil production throughput to reach 630 barrels per day to trigger County review. It should be noted that the numerical trigger for throughput review in both the original CSD language and the additional language from the settlement agreement is the same, 630 barrels per day (3% of 21,000 = 630).

The provision is considered to be fully effective at this time and no further analysis is recommended.

**New Technology:**

This provision is intended to assist in the determination of the end of the project life of the oil field based on a production throughput value. However, the additional language from the Settlement Agreement allows for County review *"at such earlier date as the County determines appropriate"*. Therefore, should the County decide that a review is appropriate prior to the oil production reaching the trigger value in the provision; the County can initiate the review.

**Recommendations to Changes in Implementation:**

The provision is intended to be implemented at or near the end of the oil fields project life and therefore has not been activated to date. The existing language and the amendments made through the Settlement Agreement provide sufficient flexibility to

allow a review as the County considers appropriate. No changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The provision has not been activated to date and the requirement has been revised by additional language from the Settlement Agreement dated July 15, 2011. No additional changes to the CSD language are recommended.

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***E.36. Abandonment Procedures.** Within 180 days of permanent facility shut down, the operator shall submit an abandonment Plan to DOGGR and submit to the director for review and approval a time line for facility removal, site assessment, and remediation as necessary. The operator shall begin abandonment of the site no later than 20 days after the director's approval of the timeline, and shall provide to the director quarterly updates on the abandonment process until such time as the oil field is abandoned and remediated. The operator shall post a performance bond to insure compliance with all provisions of this subsection and the operators and landowners shall continue to pay property taxes at the rates assessed during oil field operation until all site restoration work has been fully completed, as determined by the director.*

**Summary of Complaints:**

This provision is intended to be implemented at the cessation of oil field activities and permanent shut down of the Inglewood Oil Field; therefore, the provision has not been activated to date. The County has not received any complaints on the requirement.

**Summary of Issues Raised by the Public:**

This provision will not be implemented until permanent shut-down of the Inglewood Oil Field occurs. The County has not received any public input on the requirement.

**Analysis of Compliance and Effectiveness:**

As noted above, the provision will not be implemented until the Inglewood Oil Field is permanently shut down. The requirement includes that the facility abandonment Plan be submitted to DOGGR and reviewed and approved by the County. This review process will allow for both DOGGR and the County to ensure the abandonment Plan meets all applicable requirements for plugging and abandonment of wells, equipment removal and remediation of the site. The requirement also includes a performance bond and the continuation of property tax payments until the County determines all site restoration work has been successfully completed. The Operator has provided an abandonment bond consistent with the provisions of this subsection.

The actual abandonment provision of this subsection has not been activated, and no further analysis is recommended at this time.

**New Technology:**

As the facility has not been shut down to date, this provision has not been activated. However, the condition language requires that the abandonment Plan be submitted to DOGGR and to the County for approval. Therefore, new technologies involving facility

removal, site assessment, and remediation available at the time the facility ceases operation may be reviewed, required and implemented as applicable to the abandonment Plan.

**Recommendations to Changes in Implementation:**

The provision involves requirements for abandonment and restoration of the Inglewood Oil Field and therefore has not been implemented. No changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The provision has not been activated. In addition, new technology or improvements in facility removal, site assessment, and remediation can be included to the CSD requirement through the review and approval of the abandonment Plan. Therefore, no changes to the CSD language are recommended.

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***F.1 Environmental Quality Assurance Program ("EQAP").*** *The operator shall comply with all provisions of an environmental quality assurance program that has been approved by the director. The following provisions relate to the EQAP:*

*a. EQAP Requirements. The EQAP shall provide a detailed description of the steps the operator shall take to assure compliance with all provisions of this section, including but not limited to, all of the monitoring programs called for by this section.*

*b. Annual EQAP Reports. Within 60 days following the end of each calendar year, the operator shall submit to the director an annual EQAP report that reviews the operator's compliance with the provisions of the EQAP over the previous year and addresses such other matters as may be requested by the director. The annual EQAP report shall include the following:*

*i. A complete list and description of any and all instances where the provisions of the EQAP, or any of the monitoring programs referred to therein or in this section, were not fully and timely complied with, and an analysis how compliance with such provisions can be improved over the coming year.*

*ii. Results and analyses of all data collection efforts conducted by the operator over the previous year pursuant to the provisions of this section.*

*c. EQAP Updates. The EQAP shall be updated as necessary and submitted to the director for approval along with the annual EQAP report. The EQAP updates shall be provided to the CAP and MACC for review and comment. Comments from the CAP and MACC, if timely received, shall be considered by the director before making a decision to approve the same. The director shall complete the review of EQAP updates as soon as practicable, and shall either approve the updated EQAP or provide the operator with a list of specific items that must be included in the EQAP prior to approval. The operator shall respond to any request for additional information within 30 days of receiving such request from the director, unless extended by the director.*

**Summary of Complaints:**

The County has not received any complaints regarding the EQAP provision of the CSD.

**Summary of Issued Raised by the Public:**

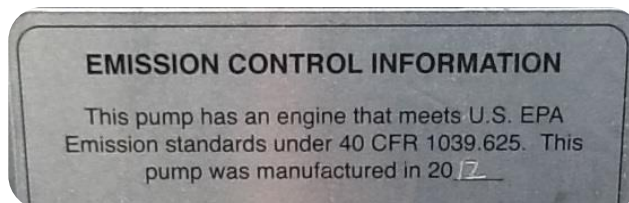
The public has not raised any issues specific to the EQAP provision. CAP members have received briefings at the CAP meetings regarding the annual audits conducted at the oil field by the ECC and the ECC responded to questions from the CAP members as appropriate.

**Analysis of Compliance and Effectiveness:**

The EQAP was approved by the County in February 2009 and was revised on August 25, 2009. The EQAP contains sections on the background and operations of the oil field, the relationship of the EQAP with other CSD monitoring compliance programs, the EQAP compliance program and the compliance monitoring conducted by the oil field operator. The document also discusses the organization and relationship of the oil field compliance team consisting of County staff, the Environmental Compliance Coordinator (ECC), the MACC, the CAP, third-party consultants and auditors, the ombudsperson, and the oil field operator staff. The EQAP contains the documentation requirements for the compliance program including the Environmental Quality Control Report, reporting of onsite inspection visits, and the format for the annual EQAP report. Subsection F.1.c requires periodic updates to the EQAP as determined by the County. The EQAP has not been required to be updated since August, 2009.

Annual EQAP compliance reports have been prepared and submitted by the operator as required by this provision with the first report completed on March 1, 2010. Subsequent reports have been completed in March 2011, February 2012, and February 2013. The annual reports are composed of three components; a narrative summary of the compliance status of the oil field, a compliance matrix in tabular format, and records of compliance documents completed for the subject year. The annual EQAP reports are reviewed by the County and are one of the primary documents analyzed during the annual compliance audits completed by the ECC.

Annual EQAP audits have been completed for the operating years 2010, 2011, and 2012. Audits are scheduled after review of the annual EQAP reports submitted by the Operator. Results of the audits are documented in a report that includes findings and recommendations for potential



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improvements in continued compliance with the EQAP-related provisions of the CSD. The suggestions are then tracked and monitored by the ECC to document the implementation of the recommendations. Overall, the Operator has been found to be in substantial compliance with all provisions of the CSD and the results of the audits have been favorable. However, recommendations for improvement have been provided after each yearly audit. Results of the 2010 EQAP audit generated the following recommendations:

- Vapor Pressure Monitoring & Venting System: Include a bar at the 90-percent mark in the CSD Vapor charts to more easily identify recorded alarms reflected in the daily alarm reports.
- Ombudsperson: Add PXP's time of response to written complaints log in order to provide documentation that PXP responds within 1 hour as specified the CSD section J.3.
- Conduct a What If Analysis on scenarios that could cause odors to include 1) Loss of power, 2) ESD activation and 3) Maintenance activities such as tank cleaning and carbon on vacuum trucks. Based on the findings, incorporate operational measures, as deemed necessary that could be taken to reduce the possibility of odors under these scenarios.
- Meteorological Station: Analyze whether or not a back-up power source can be installed to provide continuous power to the meteorological station during power outages. The intent is to ensure that meteorological data is collected without interruption. Power outages could accompany an incident at the oil field and collection of meteorological data during that time could prove to be important.
- Noise Monitoring: Reestablish the baseline at Location 2 over a continuous 72-hour period and provide continuous audio recording.

The 2010 recommendations were subsequently addressed by the Operator and incorporated into various plans and procedures as appropriate with the exception of complaint log documentation recommendation, which was adopted in 2012 as noted below.

The 2011 EQAP audit had the following recommendations:

- Ombudsperson: Add PXP's time of response to written complaints log in order to provide documentation that PXP responds within 1 hour as specified in CSD section J.3 (Note: PXP started documenting the response time in the 2012 2nd quarterly report).
- Water Management Plan: Provide an updated Plan that identifies the projected water usage numbers. Confirm the same number is reflected in the Recycled Water Report and obtain approval.

The 2011 recommendations were subsequently addressed by the Operator and incorporated into various plans and procedures as appropriate.

Recommendations from the 2012 audit included:

- Noise Making Equipment Service: Update the equipment maintenance management program (Maximo®) to include the inspection and, if necessary, service of noise making equipment consistent with CSD provision 22.44.142E5d.

The maintenance management program data shall serve as the equipment service log required by the subject requirement.

- **Contractor/Sub-Contractor Training:** The FM O&G Training Records Report does not include a complete list of contractor/subcontractor training records. Compliance with the EQAP requires confirmation that all CSD training is being conducted. Include contractor/sub-contractor training records in the FM O&G Training Records Report or provide the records in a format that documents that the required training has been completed.

The 2012 recommendations are currently being addressed by the Operator. Compliance verification will be reviewed by the County during ECC inspections and at the 2013 EQAP audit.

The annual EQAP audits provide the County with the opportunity to complete a formal review of compliance activities and compliance documentation of the provisions of the CSD. The results of the audits indicate that the oil field is being operated in compliance with those requirements. The provision is considered to be fully effective at this time and no further analysis is recommended.

**New Technology:**

Provision F.1.c requires periodic updates to the EQAP as required by the County, therefore, as new technologies are developed for environmental protection and compliance for oil field operations, those requirements may be added to the EQAP as applicable.

**Recommendations to Changes in Implementation:**

The provision has been implemented and is considered to be fully effective at this time, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The provision is considered to be fully effective at this time, and no changes to the CSD language are recommended.

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***F.2 Environmental Compliance Coordinator.*** *The operator shall recommend and fund the environmental compliance coordinators. The number of environmental compliance coordinators shall be determined by the county and shall take into account the level of oil operations at the oil field. The environmental compliance coordinator(s) shall be approved by, and shall report to, the director. The responsibilities of the environmental compliance coordinator(s) shall be set forth in implementation guidelines that may be developed by the county for the oil field and shall generally include:*

- a. On-site, day-to-day monitoring of construction or drilling and redrilling activities as determined by the director.*

*b. Taking steps to ensure that the operator, and all employees, contractors, and other persons working in the oil field, have knowledge of, and are in compliance with all applicable provisions of this section.*

*c. Evaluating the adequacy of drilling, re-drilling, and construction impact mitigations, and proposing improvements to the operator or contractors and the county.*

*d. Reporting responsibilities to the various county agencies with oversight responsibility at the oil field, as well as other agencies such as DOGGR, and SCAQMD.*

**Summary of Complaints:**

The County has not received any complaints regarding the ECC provision.

**Summary of Issues Raised by the Public:**

The County received input on the ECC in comments solicited for the Periodic Review. A member of the CAP commented that employment of the ECC by a consultant to the County is a conflict of interest and the ECC should be an independent hire. The comment is unclear; however, the ECC is hired directly by the County as part of a tri-party agreement with the Operator and acts independently from the Operator. While the Operator is required to pay for the costs of the ECC, the ECC reports directly to the County thereby avoiding any potential conflict of interest.

**Analysis of Compliance and Effectiveness:**

An ECC position has been funded by the operator as required by this provision since the adoption of the CSD. The ECC has met the qualification requirements for the position and have been approved by the County. The ECC is familiar with the compliance requirements of the CSD and the environmental impacts and mitigation associated with oil field operations. The oil field site visits performed by the ECC include an inspection of the drilling or re-drilling rig to check compliance on the CSD provisions such as the Quiet Mode Drilling Plan, air quality monitoring equipment, and noise monitoring equipment. The ECC site inspections are coordinated with oil field management to gain access to oil field staff, oil field contractors and for access to the oil field to check on the compliance provisions of the CSD. The ECC also participates in reviewing and commenting of all plans submitted by the Operator in compliance with the CSD. The ECC also includes a number of oil field related subject matter experts that can be used at any given time depending on the compliance needs of the County in ensuring compliance with the CSD. Experts include acoustical engineers, air quality, biology, landscape architects, risk assessment and planning experts, among others. As outlined in the EQAP, the ECC is part of the coordinated compliance effort of the County, other resource agencies, and the oil field operator.

The provision is considered to be fully effective at this time and no further analysis is recommended.

**New Technology:**

The EQAP and ECC provisions allow new technologies in environmental compliance equipment to be used by the ECC as those technologies are developed.



**Recommendations to Changes in Implementation:**

This provision is implemented as intended, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

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***F.3 Safety Inspection, Maintenance, and Quality Assurance Program ("SIMQAP").***

*The operator shall comply with all provisions of a safety inspection, maintenance, and quality assurance program that has been approved by the director and the fire chief.*

*a. SIMQAP Requirements. The SIMQAP shall, at a minimum provide for:*

- i. Inspection of construction techniques;*
- ii. Regular maintenance and safety inspections;*
- iii. Periodic safety audits;*
- iv. Corrosion monitoring and leak detection; and*
- v. Inspections of all trucks carrying hazardous and/or flammable material prior to loading.*

*b. SIMQAP Updates. The operator shall periodically review and revise the SIMQAP to incorporate changes in procedures, and new safety and maintenance technologies and procedures. The operator shall make such revisions at least every five years, or more frequently, if the operator determines changes are necessary or if requested by the director or the fire chief. The operator shall submit SIMQAP updates to the director and the fire chief for their review and approval. The director shall complete the review of SIMQAP updates as soon as practicable, and shall either approve the updated SIMQAP or provide the operator with a list of specific items that must be included in the SIMQAP prior to approval. The operator shall respond to any request for additional information within 30 days of receiving such request from the director, unless extended by the director.*

*c. Worker Notification. The operator shall ensure that all persons working on the oil field comply with all provisions of the currently approved SIMQAP.*

*d. Inspections. The SIMQAP shall provide for involvement of county staff or the environmental compliance coordinator in all inspections required by this section.*

**Summary of Complaints:**

The County has not received any complaints regarding the SIMQAP provision of the CSD.

**Summary of Issues Raised by the Public:**

Maintenance frequency of oil field equipment was discussed at the September and October 2013 Community Advisory Panel (CAP) meetings with regards to the overflow of a tank from a failed level controller. Members of the public requested additional information on why the controller failed, how the incident was responded to by oil field staff, and questioned the operator about redundant equipment or other measures that could be implemented to prevent equipment failures of this type in the future. The equipment in question was part of the inspection and maintenance program required by subsection F.3.a.ii of this provision. While the piece of equipment failed, it had been inspected as part of the maintenance program. The program provides for sufficient inspection and maintenance of equipment, but does not completely ensure against potential malfunctions that could occur to various pieces of equipment. The program, however, allows for a feedback loop to alert the Operator to additionally check equipment that has had the propensity for failure.



CARB Portable Equipment Registration Program Equipment Certification Placard

**Analysis of Compliance and Effectiveness:**

The SIMQAP was completed and implemented in May, 2009 and approved on 4/13/11. The document was prepared with the assistance of a professional engineer familiar with the equipment, environmental impacts, and environmental regulations of oil field facilities. The SIMQAP includes requirements for facility staffing, fire protection systems, process controls, gas detection, emergency systems, and leak prevention and detection measures. The inspection and maintenance section of the document provides details on the preventive maintenance program, safety device inspections, equipment inspections, electrical equipment inspection, and the inspection and maintenance of flow lines. The document also includes a discussion of the Transportation Security Plan which lists the requirements for trucks carrying hazardous and/or flammable materials as required by subsection F.3.a.v. Oil field staff has received training on the SIMQAP as a component of the training on the CSD completed on an annual basis.

All oil field equipment, and the associated maintenance of that equipment, is tracked and scheduled with a vendor-supplied computer-based maintenance management program (Maximo®). This schedule is linked to the requirements of the SIMQAP. The operator also conducts annual internal safety audits of the facility which provide for review and inspection of the oil field equipment. There have been no issues with equipment maintenance requiring County DRP or Public Works involvement since the adoption of the CSD.

The *Annual Well Increase Evaluation, December 2011*, reviewed the SIMQAP and noted the program serves to improve the overall safety and reliability of the oil field equipment and thereby reduces the likelihood of an equipment failure that could lead to an impact to the environment. However, a comprehensive SIMQAP audit by all appropriate agencies has not been conducted to date. It is recommended that a

SIMQAP audit be conducted over the next year in coordination with the EQAP audit and that appropriate interested regulatory agencies be noticed of the audit for participation as applicable.

The provision is considered to be fully effective at this time and no further analysis is recommended.

**New Technology:**

The SIMQAP is required by this provision to be periodically reviewed and revised to incorporate changes in procedures, new safety technologies, and new maintenance technologies.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended, and no changes to implementation are recommended. However, as stated above, it is recommended that a SIMQAP audit be conducted over the next year in coordination with the EQAP audit and that appropriate interested regulatory agencies be noticed of the audit for participation as applicable.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

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***F.4 Annual Emergency Response Drills of the County and Culver City Fire Departments.*** *The operator shall demonstrate the effectiveness of the emergency response Plan by responding to one planned emergency response drill per year which shall be conducted in conjunction with the county and Culver City fire departments. Emergency response drills required by other agencies that involve the county and Culver City fire departments can be used to satisfy this provision. In addition, the operator shall demonstrate the effectiveness of the emergency response Plan by responding to not more than two unannounced drills each year which may be called by the county fire department at the oil field. If critical operations are then underway at the oil field, the operator need not respond to a unannounced drill to the extent such a response would, as a result of such critical operations, create an undue risk of personal injury or property damage, but in such case the operator must promptly explain the nature of the critical operations, why response is not possible, and when the critical operations will be completed.*

**Summary of Complaints:**

The County has not received any complaints regarding the emergency response provision of the CSD.

**Summary of Issues Raised by the Public:**

No issues have been raised by the public regarding the emergency response drills or the requirements of the emergency response provision.

**Analysis of Compliance and Effectiveness:**

Emergency response drills were conducted annually by the operator on November 5, 2009, November 8, 2010, October 26, 2011, November 7, 2012, and November 6, 2013. Each drill is coordinated by the State Office of Spill Prevention and Response (OSPR) with notice to other resource agencies including the County and Culver City fire departments. The emergency response drills include a demonstration of the field capabilities and equipment for emergency response. The emergency response exercise held November 6, 2013 included representatives from LA County Fire Department, the Culver City Fire Department, LA County Hazardous Materials staff, and OSPR. This provisions also calls for up to two unannounced drills per year at the discretion of the Fire Department; no unannounced drills have taken place at the oil field to date.

The provision is considered to be fully effective at this time and no further analysis is recommended. However, it is recommended that efforts be made to ensure that unannounced drills take place at the oil field as allowed for by the provision of the CSD. The Department of Regional Planning will coordinate with the County Fire Department to ensure that unannounced drills occur in the future.

**New Technology:**

The annual emergency response drills and updates to the ERP document allow for new technology and techniques to be introduced and included as they become available.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended, and no changes to implementation are recommended. However, as stated above, it is important to ensure that unannounced drills are conducted periodically at the oil field.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

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***F.5 Noise Monitoring.*** *The public health department shall retain an independent qualified acoustical engineer to monitor ambient noise levels in the areas surrounding the oil field as determined necessary by the director or the director of public health. The monitoring shall be conducted unannounced and within a time frame specified by the director or the director of public health. Should noise from the oil operations exceed the noise thresholds specified in this section, no new drilling or redrilling permits shall be issued by the county until the operator in consultation with the director and director of public health identifies the source of the noise and the operator takes the steps necessary to assure compliance with thresholds specified in this section. The results of all such monitoring shall be promptly posted on the oil field website and provided to the CAP.*

**Summary of Complaints:**

The County has not received any complaints regarding the requirement for noise monitoring of this provision. Noise complaints are discussed in the analysis for CSD Provision E.5.

**Summary of Issues Raised by the Public:**

See the discussion of CSD Provision E.5, *Noise Attenuation*, for detail on noise issues with the oil field.

**Analysis of Compliance and Effectiveness:**

The provision requires that the County Department of Public Health use of an independent qualified acoustical engineer for noise monitoring if deemed necessary. As discussed in the analysis for the noise attenuation provision, no exceedances of the noise regulations in the County Code or of the noise limits specified in subsection E.5.a of the CSD have been recorded. Therefore, the County has not determined that the additional noise monitoring required by this provision has been necessary.

The provision has not been activated to date and no further analysis is recommended.

**New Technology:**

The provision requires the use of an independent qualified acoustical engineer for noise monitoring; therefore, any noise monitoring required by this provision would be completed with current noise measurement technology.

**Recommendations to Changes in Implementation:**

This provision has not been implemented to date; however, no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

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***F.6 Vibration Monitoring.*** *The public health department shall retain an independent qualified acoustical engineer to monitor vibration in the areas surrounding the oil field as determined necessary by the director or the director of public health. The monitoring shall be conducted unannounced and within a time frame specified by the director or the director of public health. Should vibration from the oil operations exceed the vibration thresholds specified in this section, no new drilling or re-drilling permits shall be issued by the county until the operator in consultation with the director and director of public health identifies the source of the vibration and the operator takes the steps necessary to assure compliance with thresholds specified in this section. The results of all such monitoring shall be promptly posted on the oil field web site and provided to the CAP. A telephone number by which persons may contact the operator at all times to register complaints regarding oil operations shall be posted in the main entrance sign to the facility and included in the annual newsletter required by subsections J.2.b and on the oil field web site required by subsection J.2.c.*

**Summary of Complaints:**

The County has not received any complaints regarding the requirement for vibration monitoring of this provision. Vibration is discussed in the analysis for CSD Provision E.6.

**Summary of Issues Raised by the Public:**

See the discussion of CSD Provision E.6, *Vibration Reduction*, for detail on vibration issues within the oil field.

**Analysis of Compliance and Effectiveness:**

The provision requires that the County Department of Public Health use an independent qualified acoustical engineer for vibration monitoring if deemed necessary. As discussed in the analysis for the vibration reduction provision, no exceedances of the vibration criteria specified in subsection E.6. of the CSD have been recorded. Therefore, the County has not determined that the additional vibration monitoring required by this provision has been necessary.

The provision has not been activated to date and no further analysis is recommended.

**New Technology:**

The provision requires the use of an independent qualified acoustical engineer for vibration monitoring; therefore, any vibration monitoring required by this provision would be completed with current vibration measurement technology.

**Recommendations to Changes in Implementation:**

This provision has not been implemented to date, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

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**F.7 Complaints.** *All complaints related to oil operations received by the operator shall be reported on the same business day to the environmental compliance coordinator and to the director. In addition, the operator shall maintain a written log of all complaints and provide that log to the director, the MACC, and CAP on a quarterly basis. Depending upon the nature of the complaint, the operator shall report the complaint to the SCAOMD, DOGGR, and any other appropriate agencies with oversight authority regarding the complaint at issue. If the complaint is received after normal business hours, it shall be reported to the environmental compliance coordinator and the agencies at the opening of the next business day*

**Summary of Complaints:**

The County has received complaints on a variety of issues regarding the operation of the oil field including noise, odor, vibration, ground movement, property damage, and dust. These complaints are discussed in the applicable sections of this Periodic Review.

**Summary of Issues Raised by the Public:**

Comments have been noted on the complaint process with requests by the public for more detail in both the follow-up investigation of complaints and the documentation of that follow-up investigation. The public has also requested that the complaint logs be documented in digital format as opposed to hand written complaint logs. Complaint logs are posted on the County web site by quarter and are no longer presented in hand written format. The public has also expressed dissatisfaction with the results of the follow-up investigation and documentation of complaints, particularly odor complaints.

**Analysis of Compliance and Effectiveness:**

The complaint procedure required by this provision has been implemented and is ongoing. The oil field assigns a primary and a back-up staff person to be on call to respond to complaints. In addition, the oil field ombudsperson is available to coordinate directly with the public to discuss complaint issues with the oil field. Oil field personnel responding to a complaint follow a procedure for logging in and responding to complaints from the public.

The procedure first requires that oil field staff call back the complaining party and obtain the following information:

- Name, address, phone number.
- Location of the issue (noise, odor, vibration, other).
- Specific detail on the complaint (sound type, smell, other).
- Time the issue was first noticed.
- Confirm with caller that the issue will be investigated.

The next step in the complaint procedure is to contact the oil field operator currently in charge of the field and initiate an investigation on the complaint. The oil field operator is required to correspond back as soon as possible on the results of the investigation. The oil field staff person handling the complaint then reports the results of the investigation back to the member of the public that filed the complaint and updates the complaint log. The incident is reported to the oil field ombudsperson no later than the next business day and the Director, ECC, and any other appropriate agency staff with oversight authority are notified of the complaint. A follow-up of the complaint is then a component of the ECC site inspection. The SCAQMD has also assisted the oil field operator on complaint investigations and their input is noted on the complaint logs. A summary of the complaint log through December 2013 is provided in the table below.

<b>Complaint Log Summary</b>						
<b>Type/Year</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>Total</b>
<b>Odor</b>	19	15	23	23	14	94
<b>Noise</b>	12	5	11	10	12	50
<b>Vibration</b>	2	2	1	1	5	11
<b>Ground Movement</b>	1	0	0	0	0	1
<b>Property Damage</b>	0	3	10	8	5	26
<b>Work Inquiry</b>	1	1	0	0	0	2
<b>Dust</b>	2	0	0	1	0	3

<b>Complaint Log Summary</b>						
<b>Type/Year</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>Total</b>
<b>Lighting</b>	0	0	0	0	1	1
<b>Visual</b>	0	0	0	1	0	1
<b>Total</b>	37	26	45	44	37	<b>189</b>

The provision is considered to be fully effective at this time and no further analysis is recommended.

**New Technology:**

Complaint logs are posted to the County web site quarterly and the equipment used for follow-up investigations, such as noise or air quality monitoring equipment, represents current technology and is updated as new technology becomes available.

**Recommendations to Changes in Implementation:**

This provision is implemented as intended and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes in the CSD language are recommended at this time.

***G.1 Cost of Implementing Monitoring and Enforcing Conditions.*** *The operator shall be fully responsible for all reasonable costs and expenses incurred by the county or any county contractors, consultants, or employees, in implementing, monitoring, or enforcing this section, including but not limited to, costs for permitting, permit condition implementation, mitigation monitoring, reviewing and verifying information contained in reports, undertaking studies, research and inspections, administrative support, and including the fully burdened cost of time spent by county employees on such matters.*

**Summary of Complaints:**

This requirement involves the County cost recovery methodology for CSD compliance; no complaints from the public have been received on this provision.

**Summary of Issues Raised by the Public:**

The public is not involved in this condition; the payment of CSD compliance and enforcement costs is a legislative procedure implemented through the CSD and the Los Angeles County Code requirements. No public input has been received on this provision.

**Analysis of Compliance and Effectiveness:**

FM O&G, and PXP prior to the change in operator, have made timely payments on all CSD monitoring and enforcement costs to the County through the draw down account required by CSD Provision G.2. All costs from the implementation of the CSD, permit processing, mitigation monitoring, compliance report research, review and verification, inspections, and administrative costs have been paid by the operator from this account.



Review of the payment history since the adoption of the CSD shows no late payments or other issues with the legislative cost reimbursement outlined in this provision.

The condition is considered to be fully effective at this time and is administrative in its intent, and no further evaluation is recommended.

**New Technology:**

This provision of the CSD is a County administrative process and a discussion of new technology is not applicable.

**Recommendations to Changes in Implementation:**

This requirement has been implemented, the subject payments are made by the operator in a timely manner, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

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***G.2 Draw-Down Account.*** *The operator shall maintain a draw-down account with the Department of Regional Planning from which actual costs will be billed and deducted for the purpose of defraying the expenses involved in the county's review and verification of the information contained in any required reports and any other activities of the county, including but not limited to, enforcement, permitting, inspection, coordination of compliance monitoring, administrative support, technical studies, and the hiring of independent consultants. The initial amount to be deposited by the operator shall be \$500,000. In the first year, if withdrawals from the account have reduced its balance to less than 50 percent of the amount of the initial deposit (\$250,000), the operator shall deposit \$50,000 in supplemental funds within 30 business days of notification. After the first year, if the balance in the draw-down account is reduced at any time to \$50,000, the operator shall deposit \$50,000 in supplemental funds on each occasion that the account is reduced to \$50,000 or less within 30 business days of notification. There is no limit to the number of supplemental deposits that may be required. At the discretion of the operator, the amount of an initial or supplemental deposit may exceed the minimum amounts specified in this subsection. The director may, from time to time, increase the minimum \$50,000 figure to account for inflation or the county's experience in obtaining funds from the account.*

**Summary of Complaints:**

This requirement involves the payment method of CSD compliance and enforcement costs between the County and FM O&G; no complaints have been received by the County on this provision.

**Summary of Issues Raised by the Public:**

This provision details the accounting and payment method of CSD compliance and enforcement costs between the County and FM O&G; no public issues have been raised on this requirement.

**Analysis of Compliance and Effectiveness:**

As noted in the discussion for CSD Provision G.1, PXP, and now FM O&G, have made timely payments on all CSD monitoring and enforcement costs. These payments have been made via the draw-down account as required by this provision. The draw-down account has been maintained at or above the \$50,000 balance as required by this requirement since the adoption of the CSD. The County has not required an increase of the minimum balance of the draw-down account to date.

The condition is considered to be fully effective at this time and is administrative in its intent, and no further evaluation is recommended.

**New Technology:**

This condition is a financial agreement between the operator and the County, and a discussion on new technology is not applicable.

**Recommendations to Changes in Implementation:**

This requirement has been implemented the draw-down account is maintained by the operator as required; and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

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***G.3 Indemnification.** The operator shall enter into an agreement with the county to indemnify and hold harmless the county, its elected and appointed officials, agents, officers, and employees from any claim, action, or proceeding for damages arising from its oil operations, including water, air or soil contamination, health impacts, or loss of property value during the oil operations, well abandonment, and post-abandonment activities with terms approved by, and in a form acceptable to, the CEO.*

**Summary of Complaints:**

This provision is administrative in its intent and is a standard condition for County approval of discretionary land use permits; no complaints have been received by the County on this provision.

**Summary of Issues Raised by the Public:**

As noted above, this is an administrative requirement that is a standard County permit condition, and no public input has been received by the County on this provision.

**Analysis of Compliance and Effectiveness:**

This provision is administrative in its intent and is a standard condition for County approval of discretionary land use permits. The required agreement was documented in a letter signed by the operator and the County dated November 12, 2009; the agreement is on file with the County.

The condition is considered to be fully effective at this time and is administrative in its intent, and no further evaluation is recommended.

**New Technology:**

This condition is an administrative requirement that is a standard County condition for all discretionary land use permits, and a discussion on new technology is not applicable.

**Recommendations to Changes in Implementation:**

This requirement is a standard County administrative requirement and has been implemented, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

***G.4 Insurance Requirements.*** *Within 90 days following the effective date of the ordinance creating this section or such later time as may be approved by the director for good cause shown, and without limiting the operator's indemnification of the county as required in the preceding subsection, the operator shall provide evidence of insurance coverage that meets county requirements as required and approved by the CEO including identifying the county and its elected and appointed officers and employees as additional insureds. Such coverage shall be maintained so long as oil operations are conducted within the district and until such time as all abandonment requirements are met and certified by the appropriate local, State, and federal agencies. Such insurance coverage shall include but is not necessarily limited to the following: general liability, auto liability, professional liability, and environmental impairment liability coverage insuring clean-up costs and endorsing for 'Sudden and Accidental' contamination or pollution. Such coverage shall be in an amount sufficient to meet all applicable State and federal requirements, with no special limitations. At the operator's request and only with county approval by the CEO, the operator may self-insure all or any part of the above coverage obligations in lieu of purchasing commercial coverage. These insurance requirements shall be in addition to all other indemnification, insurance and performance security required by federal, State, and local regulations and permits.*

**Summary of Complaints:**

This provision is administrative in its intent requiring an insurance policy for operation of the oil field; the County has not received any complaints from the public on the insurance requirement except as discussed below.

**Summary of Issues Raised by the Public:**

Input on both the insurance liability monetary amount and the amount of the performance security bond required by CSD Provision G.5 was received by the County in comments solicited for the Periodic Review. Three letters and one comment received at the CAP meeting on May 23, 2013 expressed concerns by the public on the amounts of liability insurance and bonding required by the CSD. In addition, a comment was noted at the May 23, 2013 CAP meeting that the language of both the insurance and bonding CSD provisions be revised to allow for a better interpretation of the requirements. The comment letters expressed concern that the liability insurance and bonding amounts were not sufficient. One letter referenced the 2010 Macondo Oil Rig blowout in the Gulf of Mexico and the San Bruno gas pipeline explosion as examples of the high cost of accidents related to oil and gas operations. The requirements outlined

in the Culver City oil and gas ordinance regarding bonding for oil and gas projects was noted in one comment letter.

The comments noted above by the public on the insurance and bonding provisions of the CSD can be summarized as requesting that both amounts be increased and that the amounts required be sufficient to cover a worst-case incident at the oil field.

**Analysis of Compliance and Effectiveness:**

PXP, the operator at the time of CSD adoption, provided the County with an insurance policy meeting the liability and environmental impairment liability requirements of this provision on January 18, 2010. The current operator of the oil field, FM O&G, updated this insurance to reflect the change in operator on June 25, 2013. The updated insurance policy has been reviewed by the County and meets all applicable State and federal requirements. The County has evaluated the amount of coverage currently provided by the Operator and has determined that given the nature of the operations at the oil field, no additional coverage amounts are necessary. Further, the CSD does not determine the amount of insurance required under Provision G.4 or the performance bond amount required under Provision G.5; the financial and technical requirements of these provisions are determined by the County CEO. In addition, the County may conduct additional review at any time independent of the Periodic Review process. It is also important to note that operations at the oil field are very different than those used in the examples made by the public and referenced above. The oil field does not have the same level of risk as an offshore drilling operation with potential high pressures, as in the Macondo Oil Spill, and does not include the transport of large volumes of pressurized gas, as in the San Bruno explosion.

The condition is administrative in its intent and is considered to be fully implemented, and no further evaluation is recommended.

**New Technology:**

This condition is an administrative requirement, and new technology is not applicable.

**Recommendations to Changes in Implementation:**

This requirement is an administrative requirement that has been implemented, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

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***G.5 Performance Security. The operator shall be subject to the following provisions:***

*a. Performance Bond. Prior to issuance of the first drilling or redrilling permit pursuant to this section, the operator shall provide to the department of regional planning a faithful performance bond or financial instrument in the sum to be determined by the CEO, payable to the county and executed by a corporate surety acceptable to the county and licensed to transact business as a surety in the State of California. Such*

*bond shall be conditioned upon the faithful performance by the operator of duties related to well abandonment, site restoration, and environmental cleanup and shall be in a format and include terms approved by the CEO.*

*b. Change of Operator. The performance bond shall continue in force for one year following any sale, transfer, assignment, or other change of operator of the oil field, or of the current operator's termination of activities at the oil field. The county may release said bond prior to the end of the one-year period upon satisfaction by the operator of all its obligations. Notwithstanding the foregoing, the performance bond shall not be terminated or released upon the sale, transfer, assignment, or other change of operator until the new operator has delivered a replacement bond complying with the provisions of this subsection G.*

*c. Funding Options. At its sole option, the county may accept certificates of deposit, cash deposits, or U.S. government securities in lieu of commercial bonds to meet the above bonding requirements on terms approved by the CEO.*

**Summary of Complaints:**

This provision is administrative in its intent requiring a bond regarding the abandonment, site restoration, and environmental cleanup of the oil field. The County has not received any complaints on the performance security required by this provision apart from the public input noted below and in the discussion for CSD Provision G.4.

**Summary of Issues Raised by the Public:**

As noted in the discussion for CSD Provision G.4, the County received three letters and two comments by the public on the amounts of liability insurance and bonding required by the CSD. The comments requested that the amounts of insurance and bonding be increased along with one comment requesting that the language of both requirements be revised to allow for a better interpretation of the requirements.

**Analysis of Compliance and Effectiveness:**

PXP, the operator at the time of CSD adoption, provided the County with a performance bond issued by an acceptable corporate surety licensed to transact business in the State of California on September 29, 2009. The current operator of the oil field, FM O&G, updated this bond to reflect the change in operator on June 25, 2013.

The County has reviewed the bonding requirements and determined that they are appropriate for the levels of operations at the oil field. As noted in the discussion on Provision G.4 above, the CSD does not determine the amount of insurance required under Provision G.4 or the performance bond amount required under Provision G.5; the financial and technical requirements of these provisions are determined by the County CEO. Further, the County may conduct additional review at any time independent of the Periodic Review process; therefore, the County has the ability, through this provision, to amend the amounts required if deemed necessary in the future.

The condition is administrative in its intent and is considered to be fully implemented, and no further evaluation is recommended.

**New Technology:**

This condition is an administrative requirement, and a discussion on new technology is not applicable.

**Recommendations to Changes in Implementation:**

This requirement is an administrative requirement that has been implemented; no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

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**G.6 Other Obligations.** *The insurance, indemnification, and performance security requirements in subsections G.3, G4, and G.5 shall be in addition to all other indemnification, insurance, and performance security required by federal, State and local regulations, and permits.*

**Summary of Complaints:**

This provision is administrative in its intent and references the requirements to the operation of oil field in addition to those outlined in the CSD; the County has not received complaints on this provision.

**Summary of Issues Raised by the Public:**

The County has not received input on the other agency requirements referenced by this condition. Any input received by these other agencies regarding those regulations is outside the scope of this Periodic Review.

**Analysis of Compliance and Effectiveness:**

The condition is administrative in its intent and is considered to be fully implemented, and no further evaluation is recommended.

**New Technology:**

This condition is an administrative requirement; a discussion on new technology is not applicable.

**Recommendations to Changes in Implementation:**

This requirement is an administrative requirement, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

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**G.7 Periodic Review.** *The county shall conduct a comprehensive review of the provisions of this section at least every five years to determine if the provisions of this section are adequately protecting the health, safety, and general welfare. Such reviews shall, among other things, consider whether additional provisions should be added,*

*appended, or removed. One of the main goals of the Periodic Review shall be to evaluate if proven technological advances that would further reduce impacts of oil operations on neighboring land uses should be incorporated into the provisions of this section.*

*a. Review Requirements. Each review shall include a report by a hearing officer designated by the director, which shall be prepared after public notice and an opportunity for public comment. The report shall include a comprehensive analysis of the effectiveness of this section, and shall review and consider enforcement activity, operational records, and any other issues relating to oil operations. The report, at the option of the county, may include a survey of residents near the oil field regarding noise, odors, vibrations, and other issues requested by the director of public health. A draft of the report shall be provided to the CAP and the operator for review and comment. All comments on the draft report from the CAP and the operator shall be submitted to the hearing officer in writing, and will be considered, if timely received, before the report is finalized. The final report by the hearing officer shall include a recommendation as to whether the director should prepare proposed amendment to this section for submission to the board of supervisors.*

*b. Early Reviews. At the discretion of the director, reviews of this section may be conducted more frequently than every five years. Without limiting such discretion, the director shall consider whether an early review should be undertaken if more than three material violations occur within any 12-month period.*

*c. Initial Review. The initial review shall occur no sooner than three years and no later than five years after the effective date of the ordinance establishing this section unless the director determines that such initial annual review shall occur at an earlier time pursuant to subsection b, above.*

**Summary of Complaints:**

This review is the first analysis to be completed pursuant to the Periodic Review process, thus, no complaints to date have been received by the County.

**Summary of Issues Raised by the Public:**

The County solicited input on the CSD for this Periodic Review as required by this provision. Input from the public was obtained in two main ways; results of an electronic survey and by comments provided by letter, email, and/or at the Community Advisory Panel (CAP) meetings. Comments have been received on a variety of CSD provisions and are acknowledged and discussed in the analysis of the relevant CSD condition of this report. One comment on the Periodic Review requirement was received regarding this provision requesting that the Periodic Review be completed every two years as opposed to the 5 year schedule stipulated in this condition.

**Analysis of Compliance and Effectiveness:**

This report, prepared subject to this provision, documents compliance with the Periodic Review requirement. The review provides a comprehensive analysis of the

effectiveness of the requirements of each CSD provision. Information sources and input for this review included:

- Compliance records, reports, plans, and training records.
- Monitoring data.
- Operational records.
- ECC site inspections.
- Annual EQAP audit reports.
- Enforcement actions.
- Interviews of FM O&G staff.
- Results of the electronic survey.
- CAP meeting comments.
- Written comments.
- Complaint records.

The draft report was circulated for review and comment to the CAP, members of the public, other agencies, and the operator. Comments on the draft report were considered in the preparation of the final draft. The report was prepared consistent with the five-year time frame requirement stipulated in CSD Provision G.7.c.

This report was prepared pursuant to the CSD requirement, and therefore the condition is considered to be fully implemented; no further evaluation is recommended.

**New Technology:**

This Periodic Review of the CSD discusses new technology, as applicable, in the analysis of each condition of the CSD permit of the report.

**Recommendations to Changes in Implementation:**

This requirement has been implemented, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

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***G.8 Multiple Agency Coordination Committee (“MACC”).*** A MACC shall be established to coordinate activities and communications between the various agencies with regulatory authority over the oil operations within the district. While each agency will continue to make its own decisions with regard to their respective areas of authority, the MACC will allow for collection and analysis of data and for discussion of both strategic evaluations and enforcement actions taken by the various agencies at the oil field.

*a. MACC Members.* The director shall establish a MACC that includes representatives from the following agencies: the county department of regional planning, the county fire department, the county department of public works, and the county department of public



health. The SCAQMD, the Regional Water Quality Control Board, DOGGR, and Culver City fire department shall be invited to appoint a representative from their agency as a member of the MACC.

b. *MACC Chair.* The director or his designee shall chair the MACC meetings and shall coordinate all MACC activities including scheduling and keeping minutes of MACC meetings.

c. *MACC Meetings.* The MACC shall determine its meeting schedule.

d. *Documents Provided to the MACC.* Copies of all monitoring and compliance reports, plans, and other documents that are requirements of this section shall be submitted to the MACC.

**Summary of Complaints:**

The County has not received any complaints on the MACC.

**Summary of Issues Raised by the Public:**

The County received input on the MACC during the discussion of the Periodic Review at the May 13, 2013 CAP meeting. A member of the public noted that there should be more communication between the MACC and the CAP, requesting an annual presentation to the CAP by MACC. Additional input also included requests for the members of the CAP to attend the MACC meetings. These requests will be scheduled for discussion at a forthcoming MACC meeting.

**Analysis of Compliance and Effectiveness:**

As noted above, the MACC held its first meeting on March 16, 2009. Subsequent meetings have been held on April 20, 2009, July 16, 2009, September 17, 2009, February 11, 2010, July 8, 2010, November 4, 2010, April 12, 2011, May 13, 2013, and January 28, 2014. Minutes from these meetings are available on the County web site at <http://www.planning.lacounty.gov/baldwinhills/macc>.

MACC members include the following representative agencies:

- Culver City Fire Department (CCFD).
- County of Los Angeles
- Department of Regional Planning (DRP)
- Fire Department (LACoFD)
- Department of Public Works (DPW)
- Department of Public Health (DPH)
- State of California
- Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR)
- Department of Justice, Office of the Attorney General
- California Environmental Protection Agency
- Regional Water Quality Control Board (RWQCB)

- South Coast Air Quality Management District (SCAQMD)

Pursuant to this requirement, MACC meetings are facilitated by a meeting Chair, meetings are scheduled by the committee as deemed appropriate, and oil field documents requested by the MACC are submitted in a timely manner. Regarding the CAP request to attend MACC meetings, no regulatory mechanism exists to require other MACC agencies to agree to involve the public in the annual MACC process which, by design, is intended to be an internal agency compliance review as opposed to a public forum.

**New Technology:**

This provision is administrative in its intent outlining the requirements for the MACC, and a discussion of new technology is not applicable.

**Recommendations to Changes in Implementation:**

As noted above, discussions will take place at the next MACC meeting on providing a MACC report to the CAP on annual basis. This requirement has been implemented, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

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***G.9 Related County Code Provisions.*** *The county code contains a number of provisions related to oil wells and oil field operations. Where the regulations of this section differ from any other provisions in the county code, these regulations shall supersede unless the contrary provisions are mandated by State law.*

**Summary of Complaints:**

This provision is standard administrative County language to clarify jurisdiction on similar county code requirements; there have been no complaints on this provision.

**Summary of Issues Raised by the Public:**

As noted above, this requirement is a standard administrative condition; no public issues have been noted on this provision.

**Analysis of Compliance and Effectiveness:**

The provision is a standard County requirement to clarify jurisdiction between similar codes and regulations. The CSD was developed to augment and strengthen the existing requirements codified in the County code for oil and gas operations. The requirements of the CSD supersede other provisions unless mandated by State law. There have been no conflicts between contrary code provisions requiring the County to invoke this provision to date.

This provision is standard County permit language and has not been activated to date, and no further analysis is recommended.

**New Technology:**

This provision is a standard County administrative requirement; a discussion of new technology is not applicable.

**Recommendations to Changes in Implementation:**

This requirement has not been activated to date; however, no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

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***H.1 Director's Review Required.*** *The operator shall apply for and receive approval of a director's review pursuant to the provisions of Part 12 of Chapter 22.56 prior to any new drilling and redrilling. New drilling and redrilling approved through a director's review procedure shall be limited to no more than 53 wells per year, with the maximum number of newly drilled wells of that total, limited to 45 per year, except that during the first year following the effective date of the ordinance establishing this section, new drilling and redrilling shall be limited to no more than 24 wells. Approval through director's review for drilling new wells shall be limited to 600 wells over 20 years, beginning on the effective date of this ordinance. Drilling and redrilling shall be planned to avoid over concentration of such activities in one area in anyone year, if near developed areas. The director's review procedures shall also apply to emergency actions determined by the director as necessary to prevent an imminent hazard, or to other immediate measures required for the purposes of protecting health and safety. No new permits for drilling or redrilling shall be approved by the director unless the subject wells have been approved as part of an annual drilling Plan as described in subsection E.26.c. Approval shall not be granted until copies of all related permits have been submitted to the director; other permits include, but are not limited to, the permits required by DOGGR, the county fire department, the county department of public works, the county sanitation district, RWQCB, SCAOMD, and other pertinent agencies identified by the director.*

**Summary of Complaints:**

No complaints specific to this provision has been received by the County; however, complaints regarding drilling activities have been made on several different issue areas as discussed in the relevant sections of this document.

**Summary of Issues Raised by the Public:**

Input on the number of wells allowed at the oil field has been discussed at Community Advisory Panel (CAP) meetings, in comments submitted for input on this Periodic Review and as part of the Settlement Agreement dated July 15, 2011 negotiated between concerned public parties, the County and PXP (now FM O&G). The number of wells provided for in this provision has been revised based on public input and the Settlement Agreement, a summary of which is provided below.

**Analysis of Compliance and Effectiveness:**

Provision E.26, *Drilling, Redrilling, and ReWorking Operations*, requires an annual submittal of a drilling Plan which identifies the number and other details of wells proposed to be drilled for a given year; however, it does not provide limits for the number of wells allowed on either an annual or total project basis. This provision provides the limits on wells to be drilled at the oil field on an annual basis and for the life of the CSD. These limits have been augmented by the requirements of the Settlement Agreement and the Annual Well Evaluation dated December 5, 2011. The maximum number of wells allowed per year under this provision is as follows:

- 53 new and re-drilled wells per year.
- New wells limited to 45 of the 53 well total.
- New and re-drilled wells limited to 24 for year 2009.
- 600 total wells for 20 year time frame starting at the adoption of the CSD.

The Settlement Agreement revised the annual well drilling limits and introduced the “Bonus Well” concept. The bonus wells program was developed to encourage moving well activities away from developed areas by establishing the area within 800 feet of any developed area as a target zone for well abandonment as opposed to well drilling activities. For each well abandoned in this target zone, the Settlement Agreement allowed for two new wells to be drilled outside the target zone. These “bonus wells” did not count against the annual new well limit, thus allowing for additional wells above the annual new well limit to encourage abandonment of well activities near developed areas. The Settlement Agreement also identified two drilling periods for well limits. These time periods were defined as before and after the first 50 wells are drilled, referred to as “Time Period One” and the “Full Operational Period”. In addition to reaching the 50-wells-drilled milestone, the Full Operational Period also required that the County determine that the CSD has been effective in protecting the health, safety, and general welfare of the public; this analysis, the *PXP Baldwin Hills Community Standards District Annual Well Increase Evaluation*, was completed in December 2011.

The *Annual Well Increase Evaluation* reviewed the following CSD compliance subject areas; noise, vibration, air emissions, odors, ground movement, visual/aesthetics, hazards/fire protection/emergency response, and ground water quality. The results of the review concluded that for these areas of review, the CSD has been effective in protecting the health, safety, and general welfare of the public. The 50 wells drilled milestone was reached in October, 2011.

As discussed above, the oil field entered the Full Operational Period in December 2011; the revised well limits for the CSD are as follows:

- 35 new or re-drilled wells per year.
- 18 bonus wells per year.
- 53 total wells per year.
- 500 total wells through October 1, 2028 or during the remaining life of the CSD, whichever is later.

The actual number of wells drilled at the oil field through July 30, 2013 is summarized in the table below.

<b>Number of Wells Drilled Since the Adoption of the CSD</b>		
<b>Year</b>	<b>Number of Wells</b>	<b>Bonus Wells Used</b>
2009	0	0
2010	19	0
2011	40	5
2012	20	0
2013 (through July 30, 2013)	30	0
<b>Total (through July 30 2013)</b>	<b>109</b>	<b>5</b>

As shown in the above table, the number of wells drilled at the oil field was within the allowable limits of the CSD and the CSD as revised by the Settlement Agreement. The requirements for County and other agency approval of the drilling activities stipulated by this provision are met by the annual submittal, review, and approval of the *Annual Drilling, Redrilling, Well Abandonment and Well Restoration Plan* required under Provision E.26.c.

The condition is considered to be fully effective at this time, and no further evaluation is recommended.

**New Technology:**

New technologies in oil well drilling and associated activities are discussed in the *Annual Drilling, Redrilling, Well Abandonment and Well Restoration Plan* as submitted to the County for review and approval.

**Recommendations to Changes in Implementation:**

The condition is considered to be fully effective at this time, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

The language of this CSD provision has been augmented by the terms of the Settlement Agreement, and no additional changes to the CSD language are recommended.

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***H.2 Conditional Use Permit (CUP) Required. Provided a conditional use permit has first been obtained as provided in Part 1 of Chapter 22.56, and while such permit is in full force and effect in conformity with the conditions of such permit, the following uses may be established:***

*a. Drilling or redrilling that exceeds the maximum number allowed pursuant to a director's Review;*

*b. Steam drive plant; and*

*c. New tanks with a capacity of greater than 5,000 barrels.*

**Summary of Complaints:**

This provision is administrative in its intent allowing for certain additional uses subject to a conditional use permit; no such permit has been obtained or applied for by the oil field operator to date. No complaints have been received by the County on the provision.

**Summary of Issues Raised by the Public:**

As noted above, this is an administrative requirement for a land use permit process that has not been implemented to date by the oil field operator; no input on this provision has been received by the County.

**Analysis of Compliance and Effectiveness:**

This provision is administrative in its intent and details specific uses allowed under a conditional use permit at the oil field. The operator has not obtained nor applied for such a permit to date. Drilling and re-drilling activities at the oil field have been under the maximum number allowed by the CSD except for those wells allowed for under the Settlement Agreement dated July 15, 2011 and the Annual Well Evaluation dated December 5, 2011. A steam drive plant has not been built or proposed for the oil field and all new tanks constructed to date have been sized at 5,000 or less barrels capacity. The condition is considered to be fully effective at this time, is administrative in its intent, and has not been activated to date; no further evaluation is recommended.

**New Technology:**

This condition is an administrative requirement and is linked to the conditional use permit process of the County. Any technological improvements the County deems appropriate to this provision may be implemented during the review and approval of the subject County permit.

**Recommendations to Changes in Implementation:**

This provision is administrative in its intent allowing for certain uses subject to a conditional use permit and has not been activated to date. No changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

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***H.3 Conditional Use Permit (CUP) Requirements.*** *For those uses requiring a conditional use permit, in addition to the requirements of Part 1 of Chapter 22.56, the applicant shall substantiate to the satisfaction of the hearing officer that:*

*a. The requested use is in compliance with the provisions of this section; and*

*b. All reasonable measures were taken to reduce and minimize potential impacts from the proposed operation.*

**Summary of Complaints:**

This provision is administrative in its intent and has not been activated to date; no complaints have been received by the County on the provision.

**Summary of Issues Raised by the Public:**

As noted above, this is an administrative requirement for a land use permit process that has not been implemented to date by the oil field operator; no input on this provision has been received by the County.

**Analysis of Compliance and Effectiveness:**

This provision is administrative in its intent and details specific additional requirements applicable to the oil field regarding the approval of a conditional use permit (CUP). The operator has not applied for a CUP to date.

The condition is considered to be fully effective at this time, is administrative in its intent, and has not been activated to date; no further evaluation is recommended.

**New Technology:**

This condition is an administrative requirement and provides additional specific requirements to the conditional use permit process of the County applicable to the oil field. The provision requires that in addition to existing CUP requirements mandated by the County ordinance, any proposal for a new permit substantiate that “*All reasonable measures were taken to reduce and minimize potential impacts from the proposed operation.*” Therefore, new technologies developed to minimize impacts from operation of the oil field can be required pursuant to the review and approval of the subject County permit.

**Recommendations to Changes in Implementation:**

This provision is administrative in its intent and allows for additional mitigation measures be required for any new CUP at the oil field. The provision has not been activated to date, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

As noted above, the existing CSD language allows for the County to require all reasonable measures to minimize impacts from operations at the oil field when a new CUP is approved. Therefore, no changes to the CSD language are necessary or recommended.

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***H.4 Application Where Violation Exists.*** *No application required pursuant to this section shall be accepted for processing or approved where any existing use in the district is being maintained or operated by the operator or its agents in violation of any material provision of this title.*

**Summary of Complaints:**

This provision is administrative in its intent requiring the operator to resolve any violations prior to the application of any new permit at the oil field. No complaints on this provision have been received by the County.

**Summary of Issues Raised by the Public:**

This provision has not been implemented to date, and the County has not received any input on this provision.

**Analysis of Compliance and Effectiveness:**

This provision is administrative in its intent and has not been implemented to date. The condition requires the operator to resolve any land use violations prior to the application of any new permit application at the oil field. The requirement also states that no permit application may be approved if such a violation exists.

The condition is considered to be fully effective at this time, is administrative in its intent, and has not been activated to date, and no further evaluation is recommended.

**New Technology:**

This condition is an administrative requirement linked to the County permitting process requirements; a discussion of new technology is not applicable.

**Recommendations to Changes in Implementation:**

This requirement is a County administrative requirement that has not been activated to date and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

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**I. Enforcement.** This subsection of the CSD provides enforcement provisions that augment the enforcement procedures specified in Part 6 of Chapter 22.60 of the County Code. Subsection I.1 details monetary amounts for violations and the procedures for payment and appeal of those violations and penalties. Subsection I.2 is the administrative requirement documenting that access to all records and facilities for enforcement of the CSD be made available to the County, and subsection I.3 provides for access to the oil field for inspections or as deemed necessary by the County.

The condition is considered to be fully effective at this time, no violations or enforcement actions have been taken by the County through this Periodic Review period (December 2013), and there have been no issues regarding access to compliance documentation or for access to the oil field; no further evaluation is recommended.

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**J.1 Community Advisory Panel (“CAP”).** *A community advisory panel shall be established by the director to foster communication about ongoing operations at the oil*



*field and to allow the community representatives to provide input to the county and the operator.*

*a. CAP Members. The CAP may include representatives of the county, the city of Los Angeles, the city of Culver City, West Los Angeles College, the operator, the landowners, and each of the major neighborhoods surrounding the oil field (including Ladera Heights, Windsor Hills, Oak Park, View Park, Culver Crest, Blair Hills, and Raintree). The operator and each of the governmental entities previously referred to may each designate a representative to the CAP. Each landowner and neighborhood organization of the surrounding communities may submit a nomination to the director for appointment to the CAP. Where there is no neighborhood organization, a community resident may make a request to the director to be appointed to the CAP. School districts with schools in the vicinity of the oil field and the lessors may make a request to the director to have a representative appointed to the CAP.*

*b. CAP Meetings. The CAP shall determine its meeting schedule.*

*c. Documents Provided to the CAP. A notice of availability of all monitoring and compliance reports and results, all plans, audits and studies, and any other available documents that are required by this section shall be submitted to the CAP promptly after they are prepared or otherwise available. Copies of these reports, documents, and other items shall be provided to CAP members upon request except to the extent information therein may not be legally disclosed. Prior to each CAP meeting, the county shall provide to the CAP a list of all violations of the provisions of this section that have occurred since the last CAP meeting.*

**Summary of Complaints:**

CAP meetings have occurred approximately monthly since the first meeting on March 26, 2009. The County has received input on the CAP meetings as discussed below.

**Summary of Issues Raised by the Public:**

Input on the CAP process has been made during discussion at the CAP meetings and for comments solicited for the Periodic Review. Requests have been made for revisions to the selection process of CAP members, a revision to the role of the County in the CAP process, to broadcast the CAP meetings on television, and for a larger room to hold the meetings. Additional comments were received regarding the oil field compliance and Plan documentation available to the CAP for review and comment. Requests included for the complaint logs to be available in electronic format, earlier submittal of the documents, and for strengthening the role the CAP plays in the review and approval of the documents.

**Analysis of Compliance and Effectiveness:**

The CAP was established to foster communication and ensure continued community input for the County and for FM O&G. Twenty-one panel seats were allocated to the categories specified in subsection J.1.a by the Director of Planning. Nominations were accepted on a first-come, first-serve basis and the introductory meeting was held March 26, 2009. Panelists on the CAP serve in a representative capacity and all meetings are

open to the public. Bylaws were created and approved by the CAP on June 25, 2009. Current CAP members are designated from the following entities:

- Governmental Entities
  - Department of Regional Planning
  - City of Culver City
  - West Los Angeles College
  - Culver City Council
  
- Oil Field Operator
  - FM O&G
  
- Landowners
  - Vickers Family Trust
  - Cone Fee Family Trust
  
- Neighborhood Organizations (Recognized Homeowners Association)
  - Ladera Heights Civic Association
  - Windsor Hills Homeowners Association (HOA)
  - United HOA (View Park)
  - Culver Crest Neighborhood Association
  - Blair Hills HOA
  - Raintree Community HOA
  - Baldwin Hills Estates HOA
  
- Neighborhood Organizations (No Recognized Homeowners Association)
  - Ladera Crest
  - Baldwin Vista
  
- School Districts
  - Los Angeles Unified
  - Culver City Unified
  
- Other Organizations
  - Windsor Hills Block Club
  - Community Health Council
  - Baldwin Hills Conservancy
  - The City Project

The meeting schedule for CAP meetings is determined during the monthly meetings. Monitoring reports, compliance reports, plans, audits, studies, and other documents required by the CSD are provided to the CAP as required by subsection J.1.c. Documentation made available to the CAP is typically posted on the Inglewood Oil Field

website with some materials distributed at CAP meetings in hardcopy format. Meeting minutes and informational handouts are available at the County DRP web site.

Issues with CAP membership and attendance have been discussed at recent CAP meetings. The Director of the DRP sent a letter out to CAP members in 2014 reminding them of their obligations as a member of the CAP. The County is amenable to facilitating new CAP membership as applicable.

The condition is considered to be fully effective at this time, and no further evaluation is recommended.

**Recommendations to Changes in Implementation:**

Members of the CAP have expressed concerns to DRP on various issues related to the CAP as explained above. They include a request to revisit the membership of the CAP as it relates to members that are frequently absent or have not participated in CAP meetings for a long time. In addition, members of the public have requested that additional neighborhood groups be represented and that new members be included. The DRP Director will take into consideration comments made by the public during the Periodic Review process, allow for new members to replace vacant panel seats, evaluate current CAP membership, and determine how to proceed under the existing CSD language regarding the intent of the CAP.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

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**J.2 Community Relations.**

*a. Community Meetings. The operator shall hold community meetings on an annual basis to provide updates on oil operations.*

*b. Newsletter. The Operator shall publish an informational newsletter annually, which shall contain updated information on oil operations including drilling, re-drilling, maintenance, repair, and reworking activities and all recently granted conditional use permits or applications filed for conditional use permits for the oil field. The newsletter shall be mailed by the operator to all owners of property located within 1,000 feet of the outer boundary line; all owners of property within 1,000 feet of the perimeter of the district as shown in the records of the county assessor's office; to any person or entity who has filed a written request therefore with the director; and to neighboring cities. The operator shall also make these newsletters available on the oil field web site. The oil field web site address shall be publicized in each newsletter.*

*c. Oil Field Web Site. The operator shall maintain and update on a regular basis an oil field web site that shall include information on oil operations at the oil field, including drilling and production activities. All monitoring and compliance reports and results, plans, audits and studies, and any other available documents that are required by this section (except to the extent they contain information that may not legally be disclosed) shall be promptly posted on the Oil Field Web Site in pdf format.*

**Summary of Complaints:**

The County received input on the 2013 Community Meeting, held November 12, 2013, at the December 2013 CAP meeting consisting of two main complaints. The first complaint noted that an informational video presented by FM O&G used up approximately 20 minutes of meeting time and was not relevant to the oil field. The second complaint referenced the fact that FM O&G was not prepared to answer questions from the public and that sufficient time was not allotted for those public questions. Other complaints received on the 2013 Community Meeting included a request for better noticing of the meeting, scheduling the meeting on a Saturday to allow for better attendance, and for FM O&G to have web access available to assist in answering questions from the public.

**Summary of Issues Raised by the Public:**

Input on community relations has been provided by the public at both Community Advisory Panel (CAP) meetings and for comments solicited for the Periodic Review. Specific comments include requests for better communication between the oil field operator and the public and better communication between the County and the public. The public has also requested that documentation that is posted to the oil field web site should be made available sooner. Input was also received on the complaint process; see the discussion for Provision F.7 for more detail.

**Analysis of Compliance and Effectiveness:**

Community meetings have occurred annually since the adoption of the CSD with the first meeting occurring on May 26, 2009. Subsequent meetings have taken place on April 21, 2010, June 8, 2011, October 15, 2012, November 12, 2013, and November 18, 2014. The newsletters required by Provision J.2.b have been prepared annually and are mailed out prior to the community meetings with noticing of the forthcoming meeting date, time, and location. The newsletters are distributed to the public as required and are posted on the oil field web site. The 2013 newsletter included sections on the following: an introduction to Freeport-McMoRan Oil & Gas (FM O&G) as the new operator of the oil field, a summary of operational activities for 2013, an overview of compliance efforts of the CSD to date, an outline of proposed oil field projects for 2014, an update on the landscaping status of the field, and an overview of FM O&G's community service and charitable work.

The oil field web site, <http://www.inglewoodoilfield.com>, was launched on January 19, 2010. The web site includes information on the history and future of the oil field, oil field operations, operational plans, compliance plans, community and environmental sections, and information on the CSD. The web site contains over 100 documents related to operational and compliance information with the documentation posted in pdf format as required by this provision. The web site provides contact information and includes an interactive email system to allow for direct input to the operator and for registering for email updates on oil field activities.

The condition is considered to be fully effective at this time with the community meetings, newsletter and web site implemented and ongoing, and no further evaluation is recommended.

**Recommendations to Changes in Implementation:**

Due to the public input on the 2013 Community Meeting, it is recommended that agendas for future community meetings be specific to oil field operations and issues and measures be implemented to ensure questions from the public are addressed appropriately.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

***J.3 Ombudsperson.** The operator shall designate employees or authorized agents to serve as ombudspersons to respond to questions and concerns concerning the oil operations. Each ombudsperson shall be familiar with all the provisions of this section and all conditions of approval related to permits and approvals issued by the county or the State of California. It shall be the further responsibility of the ombudsperson to facilitate, to the extent feasible, the prompt resolution of any issues that may arise relating to the above-stated matters or the impacts of the oil operations. The name, title, email address, and telephone number of the ombudsperson shall be posted on the oil field web site, prominently displayed in the newsletter, distributed twice per year to the CAP and MACC, and provided to any other persons requesting such information. An ombudsperson shall be available at all times, and shall respond within one hour after an initial call. An ombudsperson shall also meet at reasonable times with interested parties in an attempt to resolve issues related to oil operations. An ombudsperson shall have authority to initiate a response on behalf of the operator in all foreseeable matters. The operator shall be required to maintain a written log of all calls to the ombudspersons registering complaints or concerns regarding oil operations or other matters. The log shall include the complainant's name, date, time, phone number, nature of complaint, and the response or resolution offered. A copy of the log shall be provided to the director, the MACC, and the CAP on a quarterly basis.*

**Summary of Complaints:**

No complaints on the ombudsperson provision have been received by the County.

**Summary of Issues Raised by the Public:**

As noted in the discussion for Provision J.2, *Community Relations*, comments on the interface between the operator and the public have been provided at both Community Advisory Panel (CAP) meetings and for comments solicited for the Periodic Review. The main issue raised by the public regarding the ombudsperson is regarding the information provided by the ombudsperson at the CAP meetings. The public has requested that both more information be provided and that more detail be provided on the information that is presented. In addition, the public has asked that the information posted to the oil field web site be available faster than what has occurred in the past.

**Analysis of Compliance and Effectiveness:**

The ombudsperson system has been in place since the adoption of the CSD and serves as primary contact between the oil field operator and the community. The ombudsperson contact information is included in the annual newsletters and in the agendas for CAP meetings. In addition to the ombudsperson, the oil field maintains two

staff members on an on-call basis to coordinate and respond to calls from the public or regulatory agencies regarding oil field operations. The current ombudsperson, Lisa Paillet, contact information is:

Ms. Lisa Paillet  
Email: lisa\_paillet@fmi.com  
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5640 S. Fairfax Ave.  
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Although some concerns have been expressed by members of the CAP on timeliness on information received about operations at the oil field, this is considered an ongoing compliance issue that can be resolved under the existing provisions. Measures have been taken to ensure that the items that remain pending from previous CAP meetings are addressed at the next meeting by the Ombudsperson or individually with the members of the public making the inquiry. The County will remain vigilant to ensure that the Operator continues to provide information to the public through the ombudsperson as appropriate. The condition is considered to be fully effective at this time and no further evaluation is recommended.

**Recommendations to Changes in Implementation:**

This requirement has been implemented, and no changes to implementation are recommended.

**Recommendations to Changes in CSD Language:**

No changes to the CSD language are recommended.

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**K. Modification of Development Standards.**

This subsection of the CSD lists the requirements and permit processing procedures for a request for a modification to the development standards specified in subsection E of the CSD. The County may approve a modification to these standards if the oil field operator can provide documentation that satisfactorily meets the criteria specified in this provision. Subsections K.1.a through K.1.e require that a proposed modification be necessary for a substantial property right of the operator, that the modification will not create an adverse safety impact to the community or environment, the modification will not be contrary to the improvements from or purpose of the CSD, and that the proposed change be consistent with the County General Plan and permitting requirements.

Subsections K.2, K.3, K.4, K.5, and K.6 describe specific requirements for the application, noticing, permit processing procedure, notification of decision, and appeal procedures, respectively, for a modification of development standards proposal. No proposal or application for a modification of the development standards of CSD subsection E has been applied for to date. The condition is considered to be fully

effective at this time, is administrative in its intent, and has not been activated to date; no further evaluation is recommended.

**L. Implementation Provisions.**

This subsection of the CSD lists the various implementation plans and other stipulations required for initial compliance along with a submittal schedule for the subject compliance. The schedule requirements for the Plan and compliance submittals required under this provision range from 30 days to two years following the effective date of the CSD (October 28, 2008). All plans and initial requirements of this CSD subsection were completed; therefore, this requirement is no longer applicable and Periodic Review is not merited. A discussion of the ongoing implementation of the plans and conditions required by this provision is provided in the review and analysis of CSD Provisions E, *Oil Field Development Standards*, G.8, *Multiple Agency Coordination Committee*, and J, *Public Outreach*. The table below provides a summary of the plans and initial compliance requirements of this CSD subsection along with the associated submittal date.

<b>CSD Subsection L Compliance Summary</b>		
CSD Subsection L Implementation Provision	Submittal Schedule Requirement (Days)	Submittal or Completion Date
<b>1. Fire Protection and Emergency Response</b>		
• Fire Protection Audit	120	March 3, 2009
• “CAN” System	120	March 2009
• Spill Containment Response Training	90	February 4, 2009
<b>2. Air Quality and Public Health</b>		
• Odor Minimization Plan	90	February 2009
• Air Monitoring Plan	90	February 2009
• Oil Tank Pressure Monitoring and Venting	180	May 26, 2009
• Meteorological Station	120	March 26, 2009
• Fugitive Dust Control Plan	120	March 2009
• Well Amortization Report	120	March 2009
<b>3. Safety and Risk of Upset</b>		
• Propane and Natural Gas Liquids Bullet Fireproofing	90	February 23, 2009
• Gas Plant Audit	120	March 11, 2009
• Oil Tank Secondary Containment	One Year	January 23, 2010
• Retention Basins	120	January 23, 2010

Baldwin Hills Community Standards District (CSD)

<b>CSD Subsection L Compliance Summary</b>		
CSD Subsection L Implementation Provision	Submittal Schedule Requirement (Days)	Submittal or Completion Date
<ul style="list-style-type: none"> <li>Above Ground Piping</li> </ul>	One Year	January 23, 2010
<b>4. Geotechnical</b>		
<ul style="list-style-type: none"> <li>Accelerometer</li> </ul>	180	May 26, 2009
<ul style="list-style-type: none"> <li>Tank Seismic Assessment</li> </ul>	180	May 26, 2009
<ul style="list-style-type: none"> <li>Erosion Control Plan</li> </ul>	180	May 26, 2009
<ul style="list-style-type: none"> <li>Accumulated Ground Movement Study</li> </ul>	90	May 26, 2009
<ul style="list-style-type: none"> <li>Ground Movement Monitoring Plan</li> </ul>	90	May 26, 2009
<b>5. Noise Attenuation</b>		
<ul style="list-style-type: none"> <li>Drilling Quiet Mode Plan</li> </ul>	90	February 2009
<ul style="list-style-type: none"> <li>New Gas Plant Flare</li> </ul>	120	March 29, 2009
<b>6. Biological Resources</b>		
<ul style="list-style-type: none"> <li>Special Status Species and Habitat Protection Plan</li> </ul>	180	May 2009
<ul style="list-style-type: none"> <li>Emergency Response Plan</li> </ul>	180	February 17, 2010
<b>7. Cultural/Historic Resources</b>		
<ul style="list-style-type: none"> <li>Worker Training</li> </ul>	120	March 26, 2009
<ul style="list-style-type: none"> <li>Construction Treatment Plan</li> </ul>	180	May 2009
<b>8. Landscaping, Visual Screening, and Irrigation</b>		
9. Oil Field Waste Removal	180	May 2009
<b>10. Signs</b>		
<ul style="list-style-type: none"> <li>Perimeter Identification Signs</li> </ul>	60	May 18, 2009
<ul style="list-style-type: none"> <li>Oil Field Entrance Sign</li> </ul>	30	May 18, 2009
<ul style="list-style-type: none"> <li>Other Required Signs</li> </ul>	60	May 18, 2009
<ul style="list-style-type: none"> <li>Well Identification Signs</li> </ul>	180	May 18, 2009
<ul style="list-style-type: none"> <li>No Littering Signs</li> </ul>	120	May 18, 2009
11. Painting	Two Years	November 12, 2012
12. Water Management Plan	180	May 2009
13. Groundwater Monitoring	One Year	August 2009
14. Oil Field Cleanup and Maintenance	180	May 18, 2009
15. Storage of Hazardous Materials	30	December 22, 2008
16. Drilling, Redrilling, Well Abandonment, and Well Restoration Plan	60	January 2009



Baldwin Hills Community Standards District (CSD)

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<b>CSD Subsection L Compliance Summary</b>		
CSD Subsection L Implementation Provision	Submittal Schedule Requirement (Days)	Submittal or Completion Date
<b>17. Processing Operations</b>		
• Pipelines	180	May 26, 2009
• Active Pipeline Plot Plan	One Year	December 26, 2009
<b>18. Tanks</b>	180	May 26, 2009
<b>19. Monitoring and Compliance</b>		
• Environmental Quality Assurance Program (EQAP)	90	February 25, 2009
• Safety, Inspection, Maintenance, and Quality Assurance Program (SIMQAP)	180	May 26, 2009
<b>20. Administrative Items (MACC)</b>	60	March 16, 2009
<b>21. Public Outreach</b>		
• Community Advisory Panel (CAP)	60	March 26, 2009
• Oil Field Web Site	90	January 1, 2009
• Community Meeting	180	May 26, 2009



Appendix A  
Public Comments

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Appendix B

Periodic Review Summary Table

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Appendix C

Settlement Agreement and Mutual Release, July 15, 2011

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Appendix D  
Annual Well Increase Evaluation

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## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
<b>Public</b>			
BRJ-1 Brockman	All	Commenter believes DRP is not enforcing the requirements of the CSD.	The requirements of the CSD are enforced by the County, there have been no significant non-compliance issues or accidents at the Inglewood Oil Field since the provisions of the CSD have been implemented. The County Environmental Quality Assurance Program (EQAP) and Environmental Compliance Coordinator (ECC) programs closely monitor compliance with the CSD with field inspections and compliance document review. No violations of the provisions of the CSD have been recorded.
BRJ-2 Brockman	Water Use	FM O&G has refused to disclose the water usage at the oil field.	The CSD does not require such records, however, the Baldwin Hills CSD EIR provided the average water use for 2006-2007 as 160,104 gallons per day. FM O&G reported at the December 2014 CAP meeting water use for 2013 averaged 129,000 gallons per day.
BRJ-3 Brockman	Safety Brush Fires	FM O&G has not provided enough information on the cause of the oil field brush fires.	The brush fire issue has been extensively discussed and reviewed over the past several years including a discussion at the January 23, 2014 Community Advisory Panel (CAP) meeting. At the January 23, 2014 CAP meeting, Mr. Mark Olson of Southern California Edison (SCE) was present to review the two fires that were caused by SCE equipment. SCE and FM O&G presented maintenance plans to help prevent brush fires in the future. FM O&G conducts an ongoing electrical equipment inspection and maintenance program. No brush fires have occurred at the oil field since those that occurred in 2013.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
BRJ-4 Brockman	Air Quality Odors	Commenter believes FM O&G is releasing hydrogen sulfide into the air.	Comment is not clear as to when the issue with hydrogen sulfide occurred. The oil field has hydrogen sulfide monitors that are employed at drilling, redrilling, and gas plant sites; to date, no exceedance of the air monitoring criteria outlined in the CSD has occurred. In addition, hydrogen sulfide is not present in significant quantities in the oil produced at the oil field.
BRJ-5 Brockman	Safety Extraction Techniques	Commenter believes the DRP allows extreme oil extraction techniques that can cause accidents and danger to the surrounding community.	Two hydraulic fracturing tests were conducted as part of the Settlement Agreement. No additional hydraulic fracturing has occurred at the Inglewood Oil Field. DOGGR recently passed regulations, SB-4, on oil well stimulation techniques such as hydraulic fracturing. FM O&G has not applied for any permits subject to SB-4 to date.
BUD-1 Burns	Administrative	Listed dates of the MACC meetings are incorrect.	Correction acknowledged, the correct dates for the MACC meetings are; March 16, 2009, April 20, 2009, July 16, 2009, September 17, 2009, February 11, 2010, July 8, 2010, November 4, 2010, April 12, 2011, May 13, 2013, and January 28, 2014. The text has been corrected in the discussion of Provision G.8.
BUD-2 Burns	Safety Geology	Question to FM O&G regarding whether any oil field wells were drilled through a fault zone.	The question as to whether FM O&G has drilled any wells through a fault zone was discussed at the March 27, 2014 CAP meeting. As documented in the meeting minutes, FM O&G stated that they will not provide a response to the question. The provisions of the CSD do not require FM O&G to provide the subject information.
CAP-1 Cottles	Administrative	Commenter provided correct reference to the Alquist Priolo earthquake fault zone.	Thank you for the correct reference to the Alquist Priolo earthquake fault zone, the text has been revised accordingly.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
FEP-1 Ferrazzi	Administrative	Comment requests additional supporting documentation.	The Periodic Review contains supporting documentation in the Analysis of Compliance and Effectiveness section of the discussion for each CSD Provision. In addition, documentation of compliance is based on submitted plans and plan updates, site visits, graphic evidence, reports and studies. Further, the Periodic Review incorporates by reference the compliance documentation available on the County's website.
FEP-2 Ferrazzi	Geology	Bottom hole locations and bottom hole locations located outside the boundary of the CSD.	The Final Periodic Review document includes an updated map providing additional information on well surface locations (Appendix E.) Annual drilling plans include information on bottom hole locations for all wells.
FEP-3 Ferrazzi	Safety	CAN system.	The comment states that no documentation is provided about the area residents contacted during the annual testing of the CAN (Community Alert Notification) system. The annual testing of the CAN system does not involve contacting area residents. The annual testing checks a sub set of the total contacts on the CAN system list. The sub set consists of local agency contacts including County DRP and City and County Fire Departments. Documentation of the testing is provided annually to County DRP.
FEP-4 Ferrazzi	Safety	See FEP-3	Please see response to FEP-3.
FEP-5 Ferrazzi	Air Quality	Gases from oil field operations are impacting neighborhoods.	The fact that the commenter believes gases from the oil field are impacting adjacent neighborhoods is acknowledged. However, numerous studies have shown that the biggest contributor to air quality impacts are the surrounding streets and highways. This was documented in the EIR, the Health Study, and the recently completed STI Air Study.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
FEP-6 Ferrazzi	Air Quality	Bio Farm remediation soil SCAQMD NOV information inadequate.	The referenced SCAQMD NOV was dated 10/16/2012, numbered P56565, and was associated with SCAQMD Rule 1166. The NOV resulted in the cessation of the Bio Farm soil remediation activity and the NOV has been settled and the case closed. The contaminated soil was removed and disposed of at an SCAQMD approved offsite facility. Although permitted to do so, as of the date of the Periodic Review FM O&G did not have any plans to re-start the Bio Farm operations.
FEP-7 Ferrazzi	Air Quality	SCQAMD Rule 430 Breakdown report data inadequate.	The SCAQMD Breakdown reports detail the repair or corrective action taken which range from replacement of equipment to installation of additional equipment. None of the referenced breakdowns resulted in an enforcement action by the SCAQMD. This item is not a CSD issue, inquiries should be addressed directly with the SCQAMD.
FEP-8 Ferrazzi	Administrative	Request for more supporting documentation.	The Periodic Review process does not require documentation of all referenced data be included in the document itself. However, the wealth of the data is available on the County and FM O&G web sites.
FEP-9 Ferrazzi	Geology	Ground movement surveys are not accurate.	Ground movement reports are prepared by reputable, professionally certified consulting firms. In addition, the survey reports are reviewed by geologists from Public Works and DOGGR. No such deficiencies have been identified.
FEP-10 Ferrazzi	Noise	Settlement Agreement requires more noise monitoring locations.	The comment incorrectly interprets the requirement in the Settlement Agreement regarding noise monitoring. The Settlement Agreement required the determination of revised baseline noise levels based on additional monitoring locations, which was completed. The Settlement Agreement does not require 11 noise monitoring locations as suggested by the commenter.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
FEP-11 Ferrazzi	Geology Drilling Waste	Mud pits are being used at the oil field.	The referenced CSD provision, E.11 <i>Oil Field Waste Removal</i> , correctly documents the fact that oil field waste is not collected or stored in earthen sumps or pits; all such waste is collected in bins. The photographs referenced and attached to the comment show an aerial view of the oil field but do not document the use of sumps or pits for oil field waste.
FEP-12 Ferrazzi	Geology Drilling Waste	Request for additional data on the Soli Bond facility.	Since the date of the draft Periodic Review the referenced facility has changed operators; the new operator is Anterra Services. The drilling mud and tailings from drilling operations are collected in bins and transported from the drilling rig to the Anterra Facility on the Inglewood Site by truck. The Anterra facility uses additional bins and sawdust to dehydrate the drilling waste. The dehydrated drilling waste is then transported to an approved landfill. The discussion of Provision E.11 has been revised to reflect the change.
FEP-13 Ferrazzi	Operations	Drill rigs are too often concentrated in one area.	The issue and potential impact to the adjacent community of the concentration of drilling and reworking drill rigs in one area is acknowledged. The issue has been discussed at CAP meetings as documented in the Draft Periodic Review. The County Environmental Compliance Coordinator (ECC) reviews the location and number of rigs on the oil field during inspections. No over concentration of rigs or complaints of same have occurred since the issue was discussed and addressed at the CAP meetings. In addition, the Draft Periodic Review recommends that FM O&G continue to initiate better coordination in scheduling reworking and other types of rigs to address this issue.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
FEP-14 Ferrazzi	Environmental Compliance Coordinator	The DRP selection of the Environmental Compliance Coordinator is a conflict of interest.	The County contracted a consultant with expertise in oil and gas to provide independent oversight of the provisions of the CSD via the Environmental Compliance Coordinator (ECC) program. The consultant, MRS, is well known for expertise in atmospheric sciences, land use, system safety, risk of upset, air quality, health risk assessment, noise, aesthetics and fire protection. MRS staff has prepared more than 90 Environmental Impact Reports (EIR) and/or Environmental Impact Statements (EIS) for oil and gas projects and related technical studies during the past 30 years.
FEP-15 Ferrazzi	Environmental Compliance Coordinator	Request for information on the Environmental Compliance Coordinator program.	The Environmental Quality Assurance Program (EQAP) is available on the Inglewood Oil Field website, see page 15 of the EQAP document for information on the ECC.
FEP-16 Ferrazzi	Administrative	Request for information regarding an EPA violation.	The County does not have any record of a violation issued to the oil field operator by the EPA. In response to the County request to provide such documentation, FM O&G has stated that they have not received an NOV from the EPA.
FEP-17 Ferrazzi	Administrative	Draw down account use.	The commenter is incorrect, the draw down account, required under Provision G.2 <i>Draw Down Account</i> , was not used to fund the referenced letter by the County to the community regarding hydraulic fracturing.
FEP-18 Ferrazzi	Operations	Question on high rate gravel packing and hydraulic fracturing well completion techniques.	The Periodic Review correctly states that the well completion technique of hydraulic fracturing is not occurring at the Inglewood Oil Field. The comment stating that hydraulic fracturing will occur in the future is conjecture and does not warrant a response.
FEP-19 Ferrazzi	Administrative	Operator political contributions and conflict of interest concerns.	The financial issues noted in the comment are outside the scope of the Periodic Review, no response is necessary.



## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
GLG-1 Gless	Geology	Request that the ground movement survey be conducted twice per year.	Request that the annual ground movement survey be performed twice a year and that the trigger point for further analysis be revised to 0.3 inches of ground movement is acknowledged. Note that the ground movement issue is under review by DOGGR. At this point, experts have not determined that increasing the frequency of data collection would contribute in any significant way to the ground movement study analysis.
GLG-2 Gless	Noise	Request for peak level noise monitoring.	Request that the noise monitoring program include peak values is acknowledged, however, the Department of Public Health provided input during the preparation of the Periodic Review and did not recommend any changes to the monitoring program. A noise “spike” such as an instantaneous banging of pipe may not be captured by the hourly averaged noise monitoring program, however, a persistent nuisance type noise would be indicated in the monitoring. In addition, the complaint process under Provision F.7 provides for public input and documentation of noise issues.
GLG-3 Gless	Noise	Request that all rigs at the oil field use same noise mitigation as drill rig.	Request that all drill rig types at the oil field be required to have the same noise requirements as the main drill rig is acknowledged, however, are not required by the CSD.
GLG-4 Gless	Dust	Request for more landscaping/ground cover.	The County agrees with the comment that additional landscaping would help with both dust control and the visual aesthetics of the oil field. The Periodic Review recommends accelerating the schedule for the landscaping program.
GLG-5 Gless	Administration	Request to hold public meetings on weekends.	Request to hold the CAP meeting on the weekends is acknowledged, however, the County notes that County staff are not available on weekends.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
GLG-6 Gless	Safety	Request for information on the CAN system testing.	The annual testing of the CAN system does not involve contacting area residents. The annual testing checks a sub set of the total contacts on the CAN system list and provides documentation that the system is operating correctly. The sub set consists of local agency contacts including County DRP and City and County Fire Departments. Documentation of the testing is provided annually to County DRP.
GLG-7 Gless	Air Quality	Request that the SCAQMD be notified if any air monitoring device is triggered.	Request for additional notification to the SCAQMD is acknowledged. CSD Provision F.7 allows for notification and documentation of odors detected by the public via the oil field and SCAQMD 1-800 complaint numbers.
GLG-8 Gless	Administration	Request that all oil field monitoring records be maintained for the life of the project.	Request for monitoring data to be kept for the life of the project is acknowledged, however, it is not required by the CSD. Please note that it is the current practice at FM O&G to maintain and keep all monitoring records.
GLG-9 Gless	Air Quality	Request for additional meteorological stations to provide better data input to health risk study.	Request for the need of additional meteorological stations to cover the entire oil field is acknowledged, however, additional stations are not required by the CSD and were not determined to be necessary by the CSD EIR.
GLG-10 Gless	Air Quality	Request for fugitive dust testing.	The Inglewood Oil Field operates with an active dust control plan pursuant to CSD Provision E.2.p; plan requirements include the use of water trucks and other dust control methods. Regarding air quality testing, the Baldwin Hills Air Quality Study provides air toxic monitoring data for the Inglewood Oil Field. The Air Quality Study considered the 37 air toxics emitted from the Oil Field and performed a hazard identification to prioritize the air toxics of greatest concern. The Air Quality Study was completed during early 2015.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
GLG-11 Gless	Air Quality	Bio Farm remediation soil SCAQMD NOV information inadequate.	A Notice of Violation (NOV) is issued by an SCAQMD Air Quality Inspector to inform a business that it is out of compliance with applicable SCAQMD rule requirements, permit conditions or legal requirements, or with applicable state or federal air pollution regulations. The standard protocol dictates that cases for major sources such as the Inglewood Oil Field are referred to an SCAQMD prosecutor and resolved through an amicable settlement or in the courts in either civil or criminal prosecution. In the case of the comment referenced NOV for the Bio Farm soil, the case was settled amicably and did not involve a civil or criminal case. The contaminated soil was removed and disposed of at an SCAQMD approved offsite facility. Although permitted to do so, as of the date of the Periodic Review FM O&G did not have any plans to re-start the Bio Farm operations. Additional detail on the subject has been added to the Periodic Review.
GLG-12 Gless	Operations	Request to add discussion from CAP meeting to subject Periodic Review section.	The recommendation of additional level controllers for oil field tanks made at the CAP has been added to the subject discussion.
GLG-13 Gless	Administrative	Correction of reference to CAP meeting discussion.	The text referenced in the comment has been revised to indicate the subject recommendation was made by a CAP member.
GLG-14 Gless	Geology	Ground movement study is incomplete and DOGGR requires more data.	The referenced section of the Periodic Review acknowledges that DOGGR has made the determination that additional data is required to obtain a greater understanding of the ground movement at the oil field. DOGGR is currently reviewing the subject and has requested that FM O&G provide more data in an effort to better understand the relationship between ground movement and oil field activities. Additional information will be provided at the conclusion of the DOGGR study.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
GLG-15 Gless	Geology	Existing ground movement survey monuments should remain if replacement monuments are installed.	The fact that the CAP discussed the ground movement survey marker at Monitor Station 50004 (Historical Monument Inglewood E-1C) and recommended that it remain along with the new survey marker is acknowledged. Michael Montgomery of County Public Works stated at the March 27, 2014 CAP meeting that Public Works would make the same recommendation. The survey marker has been replaced and the original location retained for further study.
GLG-16 Gless	Noise	Request that noise peak levels be used for compliance as opposed to hourly average values.	Request for peak level noise monitoring is acknowledged. Noise monitoring was re-evaluated during both the Settlement Agreement and for the Annual Well Increase Evaluation (December 2010). In addition, the Department of Public Health provided input during the preparation of the Periodic Review and did not recommend any changes to the monitoring program. A noise "spike" such as an instantaneous banging of pipe may not be captured by the hourly averaged noise monitoring program, however, a persistent nuisance type noise would be indicated in the monitoring. In addition, the complaint process under Provision F.7 provides for public input and documentation of noise issues.
GLG-17 Gless	Biological Resources	Request for more analysis of oil field impacts to sensitive species and habitats.	Potential impacts to sensitive habitat and seasonal nesting birds is analyzed and monitored with the Special Status Species and Habitat Protection Plan and pre-construction surveys. Compliance with the Special Status Species and Habitat Protection Plan is documented in annual Special Status Species Compliance Reports; these reports are available on the Inglewood Oil Field web site.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
GLG-18 Gless	Lighting	Periodic Review omitted a complaint/issue with lighting.	The comment may be referring to the discussion at the August 22, 2013 CAP meeting regarding a discussion of light from the oil field impacting a nearby home. The oil field rigs lights/lighting shielding were adjusted based on this input from the public. The Periodic Review has been revised to include this discussion.
GLG-19 Gless	Signage	Request that the oil field post Prop 65 signage.	The oil field does have the referenced and requested Proposition 65 signage, the signs are posted on the oil field fence near the gated entrances.
GLG-20 Gless	Water	Notes that issues regarding storm water basins and potential offsite contaminant runoff were discussed at CAP meetings.	The comment may be referring to the multiple inquiries from members of the general public and the CAP regarding an algae issue with one of the drainage basins. The basin's top layer was covered with blue-green algae which was tested and determined to be a cyanobacteria, which produces oxygen when in bloom and takes oxygen from the water when it decays. Note that any storm water discharge from the oil field drainage basins requires water sampling and chemical analyses pursuant to the oil field RWQCB permit. No exceedance of the RWQCB permit threshold levels have been documented during the 5 year period of the CSD review.
GLG-21 Gless	Safety Hazardous Materials	Hazardous materials are stored at the oil field and potential offsite impacts should be analyzed.	The hazardous waste storage area includes secondary containment to capture any potential spill or leaking container and is inspected periodically by the ECC. A determination of a potential spill and the subsequent path of airborne pollutants would depend on a variety of variables including the meteorology at the time of the release. Such an analysis is beyond the scope of the Periodic Review. Please note that potential offsite impacts from oil field activities are discussed in Section 4.3 of the EIR for the CSD.

## Periodic Review Public Draft Comments

<b>Comment #</b>	<b>Issue Area</b>	<b>Brief Description</b>	<b>Response</b>
GLG-22 Gless	Operations	Question on high rate gravel packing and hydraulic fracturing well completion techniques.	Comment acknowledged, however, the referenced text correctly refers to the fact that hydraulic fracturing is not occurring at the oil field, the text is not referring to the well completion technique gravel packing.
GLG-23 Gless	Administrative	Typographical errors.	The County appreciates the input on the typographical errors, the referenced text has been corrected.
GLG-24 Gless	Operations Complaint Process	Multiple rigs in one area cause offsite impacts and subsequent public complaints.	Comment on the potential impacts of multiple drill rigs operating in one area is acknowledged. The County and the ECC have been coordinating with FM O&G to avoid scheduling multiple rigs in the same area. The ECC monitors the placement of the rigs during periodic inspections.
GLG-25 Gless	Operations	All well testing should be reported to the SCQAMD.	The referenced provision, E.32 Abandoned Well Testing, requires the operator to report the test results to DOGGR. The testing results have been submitted to DOGGR and the provision has not required any wells to be re-abandoned to date.
GLG-26 Gless	Operations	Well testing results.	Comment noted, however, the results of the E.32 Abandoned Well Testing have not required any wells to be re-abandoned to date. The SCAQMD Blue Sky Testing is a comprehensive field testing program that covers active wells, tanks, pipelines, etc. and is not focused on abandoned well testing.
GLG-27 Gless	Administrative	Correction to Periodic Review regarding reference to CAP meeting discussion.	The referenced text has been revised to acknowledge the comment in question was made by a CAP member as opposed to a member of the public.
GLG-28 Gless	Administrative	Comment on Periodic Review text regarding reference to CAP meeting discussion.	The referenced text includes discussion that the CAP noted the need for redundant equipment or other measures that could be implemented to prevent equipment failures of this type in the future.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
GLG-29 Gless	Noise	Request that noise peak levels be used for compliance as opposed to hourly average values.	Request for peak level noise monitoring is acknowledged. Noise monitoring was re-evaluated during both the Settlement Agreement and for the Annual Well Increase Evaluation (December 2010). In addition, the Department of Public Health provided input during the preparation of the Periodic Review and did not recommend any changes to the monitoring program. A noise “spike” such as an instantaneous banging of pipe may not be captured by the hourly averaged noise monitoring program, however, a persistent nuisance type noise would be indicated in the monitoring. In addition, the complaint process under Provision F.7 provides for public input and documentation of noise issues.
GLG-30 Gless	Administrative	Draw down account information.	Comment is not clear, as noted in the Periodic Review, the draw-down account has been maintained at or above the \$50,000 balance as required by this requirement since the adoption of the CSD. The County has not required an increase of the minimum balance of the draw-down account to date. Insurance requirements and the performance security are separate from the draw-down account.
GLG-31 Gless	Administrative	Comment on Periodic Review text regarding reference to CAP meeting discussion.	Comment acknowledged, the referenced incident was discussed at CAP meetings.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
GLG-32 Gless	Administrative	Comment on Periodic Review text regarding reference to CAP meeting discussion.	Comment acknowledged, however, the referenced text notes that the CAP/public has requested that both the amounts for insurance and bonding be increased. Note that the CSD does not determine the amount of insurance required under Provision G.4 or the performance bond amount required under Provision G.5; the financial and technical requirements of these provisions are determined by the County CEO. As part of the Periodic Review, the County evaluated Provisions G.4 and G.5 and may perform additional review at any time independent of the Periodic Review process.
CAP-2 Gless	Geology	Ground movement study is incomplete and DOGGR requires more data.	Request that the annual ground movement survey be performed twice a year is acknowledged, see also GLG-14.
CAP-3 Gless	Signage	Request that the oil field post Prop 65 signage.	The oil field does have the referenced and requested Proposition 65 signage, the signs are posted on the oil field fence near the gated entrances.
GOL-1 Gosnell	Administrative	Support for the oil field and oil field operator.	No response is required.
GOL-2 Gosnell	Administrative	Note that DOGGR holds the regulatory jurisdiction for down hole activities.	Comment acknowledged that DOGGR has the jurisdiction on the down-hole activities at the Inglewood Oil Field.
GYK-1 Gyi	Air Quality Health Study	Health Study inadequate and should be redone.	Commenter input on the adequacy of the Community Health Study acknowledged.
HAD-1 Haake	Administrative	Periodic review process.	Comment provides review of CSD Periodic Review process, no response necessary.
HAD-2 Haake	Administrative	Periodic review process.	Comment provides review of CSD Periodic Review process, no response necessary.
HAD-3 Haake	Air Quality	Request for more meteorological stations.	Request for the need of additional meteorological stations to cover the entire oil field is acknowledged, however, additional stations are not required by the CSD and are not considered to be necessary.



## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
HAD-4 Haake	Air Quality Health Study	Health Study inadequate.	Comment that the methodology used for the Community Health Risk Assessment was not adequate noted. The study was conducted by an experienced professional epidemiologist from the Public Health Department. The Public Health Department designed and conducted the study to professionally accepted standards.
HAD-5 Haake	Geology	Correlation of ground movement with oil field operations.	The issue of ground movement, oil production pressure, oil field water injection pressure, and reservoir balance was discussed at the March 27, 2014 CAP meeting. Mr. Michael Montgomery from the County provided a presentation on the subject and was assisted by DOGGR representatives John Geroch and Jason Marshall. DOGGR is currently reviewing the subject and has requested that FM O&G provide more data in an effort to better understand the relationship between ground movement and oil field activities. Additional information will be provided at the conclusion of the DOGGR study.
HAD-6 Haake	Operations	Request for information on the September 2010 leak at the Culver City Dog Park.	The September 2010 fluid release to the Culver City Dog Park was caused by seepage from an Atlantic Oil Company abandoned well which was abandoned in 1972. PXP, now FM O&G, Culver City, and DOGGR investigated the well and determined the well required remedial action to re-seal and re-abandon the well. FM O&G and Atlantic Oil completed the work and remediation work and the park was reopened March 3, 2011.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
HEH-1 Heins	Air Quality Noise	Odor and noise issues impacts the surrounding community.	Odor complaints dated August 27, 2013, March 16, 2014, and April 8, 2014 noted. The commenter notes that the AQMD was contacted for each of the subject odor complaints and the County encourages the public to contact both FM O&G and the AQMD to report odors. CSD Provision E.5, Noise Attenuation, provides requirements to minimize noise including the Quiet Mode Drilling Plan which is required between the hours of 6:00 pm and 8:00 am.
KUJ-1 Kuechle	Administrative	Request for discussion of Periodic Review recommendation process at CAP meetings.	Request acknowledged; the results of the Periodic Review have been discussed at CAP meetings along with the rationale for the recommendations contained in the review.
KUJ-2 Kuechle	Administrative	Request for more analysis on CSD Provisions G.4 and G.5.	The CSD does not determine the amount of insurance required under Provision G.4 or the performance bond amount required under Provision G.5; the financial and technical requirements of these provisions are determined by the County CEO. As part of the Periodic Review, the County evaluated Provisions G.4 and G.5 and determined that no recommendations for changes were needed at this time. The County may perform additional review at any time independent of the Periodic Review process.
KUJ-3 Kuechle	Administrative	Request for more analysis on CSD Provisions G.4 and G.5.	The CSD does not determine the amount of insurance required under Provision G.4 or the performance bond amount required under Provision G.5; the financial and technical requirements of these provisions are determined by the County CEO. As part of the Periodic Review, the County evaluated Provisions G.4 and G.5 and may perform additional review at any time independent of the Periodic Review process.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
KIJ-4 Kuechle	Administrative	Request for more analysis on CSD Provisions G.4 and G.5.	The CSD does not determine the amount of insurance required under Provision G.4 or the performance bond amount required under Provision G.5; the financial and technical requirements of these provisions are determined by the County CEO. As part of the Periodic Review, the County evaluated Provisions G.4 and G.5 and determined that no recommendations for changes were needed at this time. The County may perform additional review at any time independent of the Periodic Review process.
KIJ-5 Kuechle	Administrative	Request for more analysis on CSD Provisions G.4 and G.5.	The CSD does not determine the amount of insurance required under Provision G.4 or the performance bond amount required under Provision G.5; the financial and technical requirements of these provisions are determined by the County CEO. As part of the Periodic Review, the County evaluated Provisions G.4 and G.5 and determined that no recommendations for changes were needed at this time. The County may perform additional review at any time independent of the Periodic Review process.
KIJ-6 Kuechle	Administrative	Request that FM O&G focus the topic of the Community Meeting to oil field operations and be prepared to respond to input from the public.	Comment acknowledged, the County is working with FM O&G to be prepared and have resources available at the Community Meeting to answer questions from the public. FM O&G has provided issue area experts at recent CAP meetings, for example, a mineral rights/property rights consultant provided a presentation on oil lease rights and law at the July 24, 2014 CAP.
KIJ-7 Kuechle	Administrative	Request that FM O&G be prepared to respond to input from the public at CAP meetings.	Comment acknowledged, the County is working with FM O&G to be prepared and have resources available at the CAP meetings to answer questions from the public.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
KIJ-8 Kuechle	Administrative	Request that documentation provided by FM O&G be legible.	Comment acknowledged; the County has requested that the watermarks on documents prepared and posted by FM O&G be of a much lighter tint such that the documents are legible.
CAP-4 Kuechle	Administrative	Request that documentation provided by FM O&G be legible.	See response to KIJ-8.
CAP-19 Kuechle	Administrative	Request for legend/key for map figures in Periodic Review.	Request to add a key to the cover sheet map acknowledged, the revised map contains a key.
CAP-20 Kuechle	Administrative	Request for legend/key for map figures in Periodic Review.	Request to improve the key to the map on page 4 is acknowledged, the revised map contains a key.
CAP-21 Kuechle	Administrative	Request to make the recommendations in the Periodic Review requirements.	Comment acknowledged, however, to make the recommendation a requirement would necessitate revising the provision language which does not affect the implementation of the recommendations and is not considered to be necessary. The County is not recommending a change to the provision language of the CSD at this time.
KUK-1 Kutcher	Administrative	Request that the Periodic Review analyze the potential for converting the oil field to a park.	CSD Provision G.7, <i>Periodic Review</i> , requires the County to conduct a comprehensive review of the provisions of the CSD to determine if the measures are “adequately protecting the health, safety, and general welfare”. The potential conversion of the Inglewood Oil Field to park land is outside the scope of the Periodic Review.
KUK-2 Kutcher	Administrative	Request that the Periodic Review analyze various issues outside the scope of the CSD.	As noted in response KUK-1, the Periodic Review process is focused on analyzing the effectiveness of the provisions of the CSD. The document does address new technologies, see information provided under the <i>New Technology</i> section of each provision. Issues such as a sunset date for oil exploration, acquisition of park land, and an oil production tax are outside the scope of the Periodic Review.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
KUK-3 Kutcher	Operations	Enhanced oil recovery techniques add safety risks to the surrounding community.	Comment that certain enhanced oil recovery techniques may increase the potential for earthquakes is acknowledged, however, note that the well completion technique, hydraulic fracturing, is not being used at the Inglewood Oil Field.
KUK-4 Kutcher		Request that the Periodic Review analyze the potential for converting the oil field to a park.	Please see response to comment KUK-1.
KUK-5 Kutcher	Administrative	Request that the Periodic Review analyze various issues outside the scope of the CSD.	The provisions of the CSD are intended to protect the health, safety, and general welfare of the community and environment. The results of the Periodic Review indicated the CSD is working as intended. Regarding new technologies, the Periodic Review includes discussion of applicable new technology as applicable for each CSD provision. Issues such as a sunset date for oil exploration, acquisition of park land, and an oil production tax are outside the scope of the Periodic Review.
MCD-1 McNeill	Administrative	Request that public input be an integral part of the Periodic Review process.	Comment acknowledged, the County will include input from the public and the members of the CAP in the analysis of the provisions of the CSD. To date, the Periodic Review has been discussed at several CAP meetings including the meeting on April 24, 2014 where specific comments on the document were solicited and documented. In addition, additional opportunities exist to provide comments during the public hearing process.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
MCD-2 McNeill	Administrative	Request that resources be made available for environmental studies.	The County notes that most studies conducted for the CSD did not have any limitations regarding resources; examples include the EIR, the Settlement Agreement, and the Annual Well Increase Evaluation. In addition, during development of the scope for the Air Quality Study, additional funds were requested and obtained to augment the original budget. Although additional resources may enhance a particular study, the County has determined that the studies conducted to date for the Inglewood Oil Field have been more than adequate to reflect the impacts associated with operation of the oil field.
MCD-3 McNeill	Geology	Request that the ground movement survey be conducted twice per year and be coordinated with other regulatory agencies.	Request that the annual ground movement survey be performed twice a year is acknowledged. At this point, experts have not determined that increasing the frequency of data collection would contribute in any significant way to the ground movement study analysis. DOGGR is currently reviewing the subject and has requested that FM O&G provide more operational data in an effort to better understand the relationship between ground movement and oil field activities. Additional information will be provided at the conclusion of the DOGGR study.
MCD-4 McNeill	Biological	Request for comprehensive biological surveys.	The initial Special Status and Species Protection Plan, dated May 2009, provides an overview of the flora and fauna of the entire oil field. The Plan is available on the oil field web site.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
MCD-5 McNeill	Water	Request that recycled water options be explored for use at the oil field.	The request that recycled water options for oil field use is acknowledged. The use of recycled water was researched during the preparation of the CSD EIR and the analysis determined that no pipeline exists that could deliver recycled water to the oil field; this remains the case to date. The County notes that storm water from the oil field catch basins is utilized for dust control by pumping the water to above ground tanks and then into water trucks.
MCD-6 McNeill	Water	Request that the ground water monitoring program include up gradient wells.	The request for up gradient groundwater monitoring locations was noted as a recommendation by the RWQCB in a letter dated October 17, 2012 and was discussed at the January 23, 2014 CAP meeting. The existing ground water monitoring system network was designed with input from the RWQCB and recent permits issued by RWQCB to FM O&G have not required up gradient monitoring locations. Additional monitoring sites are not deemed necessary and are not required by RWQCB at this time.
MCD-7 McNeill	Air Quality	Odorant used for Bio-Farms was inadequate to prevent offsite impacts.	Comment on the odor issue with the operation of the Bio-Farms and movement of soil at the oil field is acknowledged. Operation of the Bio-Farms was halted as a result of the SCQAMD inspection and subsequent violation. FM O&G is reviewing options and technologies regarding potential operation of the Bio-Farm operations and is permitted to re-start operation of them but does not currently have any plans to do so.
MCD-8 McNeill	Operations	Request that the use of in ground sumps or pits for drilling waste be prohibited.	The County concurs with the comment as reflected by the recommendation for Provision E.15.a. If the ground sumps are not currently being used at the Inglewood Oil Field and provisions prohibiting such a use are not necessary.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
MCD-9 McNeill	Air Quality	Request to augment oil field dust/mud control measures.	Comment on dust and mud control and material leaving the oil field is acknowledged. The County notes that during rain events in 2013/2014 FM O&G augmented road cleaning and oil field exit rumble strips with vehicle washing at the Stocker Road exit gate. Additional dust control measures are outlined in the Fugitive Dust Control Plan.
MCD-10 McNeill	Administrative	Request for joint CAP/MACC meeting.	Request for a joint CAP/MACC meeting acknowledged and the issue has been discussed at CAP meetings. However, no regulatory mechanism exists to require other MACC agencies to agree to involve the public in the annual MACC process which, by design, is intended to be an internal agency compliance review as opposed to a public forum. MACC meeting results are shared and discussed with the CAP.
MCD-11 McNeill	Administrative	CAP membership and attendance.	Issues with CAP membership and attendance have been discussed at recent CAP meetings. The Director of DRP recently sent a letter out to CAP members reminding them of their obligations as a member of the CAP. The County is amenable to facilitating new CAP membership as applicable.
CAP-8 Sahli-Wells	Operations	Request to prohibit certain well stimulation methods.	Request to prohibit hydraulic fracturing and other well stimulation methods until regulations are in place is acknowledged, however, such an action is outside the scope of the Periodic Review. Please note that no hydraulic fracturing has been conducted at the oil field since the two test wells in 2011/2012. Hydraulic fracturing well completion is under the jurisdiction of DOGGR and the recently promulgated SB-4 regulations.
CAP-9 Sahli-Wells	Landscaping	Landscaping effort is behind schedule.	Comment on the status of the landscaping effort at the oil field is acknowledged, please see the Periodic Review recommendation for Provision E.10.



## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
CAP-10 Sahli-Wells	Administrative	Request that resources be made available for environmental studies.	The County notes that most studies conducted for the CSD did not have any limitations regarding resources; examples include the EIR, the Settlement Agreement, and the Annual Well Increase Evaluation. In addition, during development of the scope for the Air Quality Study, additional funds were requested and obtained to augment the original budget. Although additional resources may enhance a particular study, the County has determined that the studies conducted to date for the Inglewood Oil Field have been more than adequate to reflect the impacts associated with operation of the oil field.
CAP-11 Sahli-Wells	Administrative	Request that public noticing be enhanced.	Oil field activities and compliance with the CSD are discussed at the monthly CAP meetings. Notice of the CAP meetings is accomplished by email of the meeting agenda to CAP members and interested members of the public. As CAP members are representatives of various neighborhood and community groups, it is expected that the CAP members provide information and notice of issues of interest to those groups. In addition, the County and FM O&G web sites contain a substantial amount of information on the oil field and CSD compliance.
CAP-12 Sahli-Wells	Administrative	Request for joint CAP/MACC meeting.	Request for a joint CAP/MACC meeting acknowledged and the issue has been discussed at CAP meetings. However, no regulatory mechanism exists to require other MACC agencies to agree to involve the public in the annual MACC process which, by design, is intended to be an internal agency compliance review as opposed to a public forum.
CAP-13 Sahli-Wells	Safety	Request for public involvement in oil field safety drills.	Request that ERP drills include neighbors is acknowledged, however, public involvement in the ERP drills is not necessary and would potentially interfere with the proper implementation of the drills.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
CAP-14 Sahli-Wells	Administrative	The new technology analysis in the Periodic Review needs to be enhanced.	Request that new technology be further explored in the Periodic Review is noted, the County has provided a discussion on new technology for each provision of the Periodic Review as applicable.
CAP-15 Sahli-Wells	Administrative	Request for more analysis on CSD Provisions G.4 and G.5.	The CSD does not determine the amount of insurance required under Provision G.4 or the performance bond amount required under Provision G.5; the financial and technical requirements of these provisions are determined by the County CEO. As part of the Periodic Review, the County evaluated Provisions G.4 and G.5 and determined that no recommendations for changes were needed at this time. The County may perform additional review at any time independent of the Periodic Review process.
CAP-16 Sahli-Wells	Administrative	CAP membership and attendance.	Issues with CAP membership and attendance have been discussed at recent CAP meetings. The Director of the DRP recently sent a letter out to CAP members reminding them of their obligations as a member of the CAP. The County is amenable to facilitating new CAP membership as applicable.
CAP-17 Sahli-Wells	Administrative	Drilling operations should be consolidated to allow for open park space.	CSD Provision G.7, <i>Periodic Review</i> , requires the County to conduct a comprehensive review of the provisions of the CSD to determine if the measures are “adequately protecting the health, safety, and general welfare”. The potential conversion of the Inglewood Oil Field to park land is outside the scope of the Periodic Review.
CAP-18 Sahli-Wells	Air Quality	General comment on GHGs.	The City of Culver City concern on GHG gases, GHG emission from drilling activities at the oil field, and the State GHG legislation and goals is acknowledged. The EIR for the CSD addressed GHGs and no additional requirements are needed at this time.
CAP-5 Steva	Administrative	Administrative	Comment from CAP member that the CHC will be providing a comment letter, no response is necessary.

## Periodic Review Public Draft Comments

<b>Comment #</b>	<b>Issue Area</b>	<b>Brief Description</b>	<b>Response</b>
CAP-6 Steva	Administrative	Recommendations in the Periodic Review should be strengthened.	Comment from CAP member to strengthen the recommendations, comment acknowledged. The Periodic Review contains eleven recommendations to enhance the implementation and effectiveness of the CSD. A summary of those recommendations is listed in Section 1.6 of the document.
CAP-7 Steva	Air Quality	Air quality study was not conclusive	Comment from CAP member that the air quality/public health study was not conclusive and should be, comment acknowledged. The study was conducted by an experienced professional epidemiologist from the Public Health Department. The Public Health Department designed and conducted the study to professionally accepted standards.
WAY-1 Watson	Air Quality	Request for more meteorological stations.	Request for the need of additional meteorological stations to cover the entire oil field acknowledged, however, additional stations were not determined to be necessary by the CSD EIR.
WIT-1 WIT-2 Williams	Air Quality	Request for more meteorological stations.	Request for the need of additional meteorological stations to cover the entire oil field acknowledged, however, additional stations were not determined to be necessary by the CSD EIR.
WIT-3 Williams	Air Quality	Odor complaint process.	Potential sources and potential offsite impacts of gases is included in the EIR for the CSD; please see Sections 4.1 and 4.2. No additional emissions beyond those projected in the EIR have occurred. In fact, the majority of the odor complaints received since the adoption of the CSD were found to be not associated with oil field operations.
WIT-4 Williams	Air Quality	Odor complaint process.	Comment noted, however, the CSD EIR did not determine the need for dense gas modeling.
WIT-5 Williams	Air Quality	Odor complaint process.	Comment acknowledged, the ECC has worked with FM O&G to include wind direction and wind speed information as part of the investigation of odor complaints at the oil field.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
WIT-6 Williams	Air Quality	Odor complaint process.	Comment noted, however, the provisions of the CSD do not require portable meteorological stations as part of the response and investigation into odor complaints.
WIT-7 Williams	Air Quality	Odor complaint process.	Comment noted, however, oil field air quality monitoring to date has not detected pollutants at the concentrations noted in the comment.
WIT-8 Williams	Air Quality	Health risk assessment recommendations.	Comment noted, however, oil field air quality monitoring to date has not detected pollutants at the concentrations noted in the comment.
WIT-9 Williams	Air Quality	Health risk assessment recommendations.	Comment noted, however, the HRA was completed pursuant to the requirements of the CSD. In addition, the STI Baldwin Hills Air Quality Study, report released in February 2015, provided updated information on the potential health risk of the Inglewood Oil Field.
WIT-10 WIT-11 WIT-12 WIT-13 WIT-14 Williams	Air Quality	Health risk assessment recommendations.	Comment on updating the HRA with odor complaint data is acknowledged, however, odor complaints are followed up pursuant to the requirements of the CSD. Further, it is outside the scope of the Periodic Review to direct the County Public Health Department to conduct an additional HRA at this time. Note that the STI Baldwin Hills Air Quality Study, report released in February 2015, provided updated information on the potential health risk of the Inglewood Oil Field.
WIT-15 Williams	Geology	Request for monthly ground movement surveys.	Request for monthly ground movement surveys is acknowledged. At this point, experts have not determined that increasing the frequency of data collection would contribute in any significant way to the ground movement study analysis. DOGGR is currently reviewing the subject and has requested that FM O&G provide more operational data in an effort to better understand the relationship between ground movement and oil field activities. Additional information will be provided at the conclusion of the DOGGR study.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
WIT-16 Williams	Geology	Ground movement surveys should be correlated with bottom holed data.	The requested studies and surveys are not required by the provisions of the CSD and have not been required by DOGGR, Public Works, or any other regulatory agency to date.
WIT-17 Williams	Geology	Ground movement surveys should be correlated with field pressure data.	The requested studies and surveys are not required by the provisions of the CSD and have not been required by DOGGR, Public Works, or any other regulatory agency to date.
WIT-18 WIT-19 Williams	Geology	Request for additional ground movement survey markers.	The requested studies and surveys are not required by the provisions of the CSD and have not been required by DOGGR or any other regulatory agency to date. However, due to potential interference from tree roots or other issues, twelve survey markers were added in 2014 with baseline measurements taken during the 2014 survey. The original twelve markers were left in place and will continue to be surveyed.
WIT-20 Williams	Geology	Ground movement surveys should be correlated with well and field pressure data.	The requested studies and surveys are not required by the provisions of the CSD and have not been required by DOGGR or any other regulatory agency to date.
WIT-21 WIT-22 WIT-23 WIT-24 WIT-25 WIT-26 Williams	Operations	Request for more information on the oil field leak incident at the Dog Park.	The September 2010 fluid release to the Culver City Dog Park was caused by seepage from an Atlantic Oil Company abandoned well which was abandoned in 1972. PXP, now FM O&G, Culver City, and DOGGR investigated the well and determined the well required remedial action to re-seal and re-abandon the well. FM O&G and Atlantic Oil completed the work and remediation work and the park was reopened March 3, 2011.
WIT-27 Williams	Administrative	Request for data.	The requested information and data are not required by the provisions of the CSD and are outside the scope of the Periodic Review. Requests for information relating to DOGGR permits should be made to DOGGR.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
WIT-28 Williams	Administrative	Request for data.	The requested information and data are not required by the provisions of the CSD and are outside the scope of the Periodic Review. Requests for information relating to DOGGR permits should be made to DOGGR.
<b>Organizations</b>			
CHC-1 Community Health Councils	Administrative	Request that resources be made available for environmental studies.	The County notes that most studies conducted for the CSD did not have any limitations regarding resources; examples include the EIR, the Settlement Agreement, and the Annual Well Increase Evaluation. In addition, during development of the scope for the Air Quality Study, additional funds were requested and obtained to augment the original budget. Although additional resources may enhance a particular study, the County has determined that the studies conducted to date for the Inglewood Oil Field have been more than adequate to reflect the impacts associated with operation of the oil field.
CHC-2 Community Health Councils	Administrative	Request for additional analysis in the Periodic Review regarding new technology and insurance/bonding.	Request that new technology be further explored in the Periodic Review is noted, the County has provided a discussion on new technology for each provision of the Periodic Review as applicable. Regarding the potential use of an electrical drill rig, as discussed at the October 24, 2013 CAP meeting, the existing power supply available to the oil field is not sufficient to power an electric drill rig. Regarding insurance and bonding, the CSD does not determine the amount of insurance required under Provision G.4 or the performance bond amount required under Provision G.5; the financial and technical requirements of these provisions are determined by the County CEO. As part of the Periodic Review, the County evaluated Provisions G.4 and G.5 and may perform additional review at any time independent of the Periodic Review process.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
<p style="text-align: center;">CHC-3 CHC-4 Community Health Councils</p>	<p style="text-align: center;">Administrative</p>	<p style="text-align: center;">Request for additional data access for the public.</p>	<p>The County DRP does not have the jurisdiction to require other County agencies, the SCAQMD, or State agencies to post their permits or compliance documents for the Inglewood Oil Field. Further, the provisions of the CSD do not require FM O&amp;G to post the permits or compliance documents from other County agencies, the SCAQMD, or State agencies. Interested members of the public may view applicable compliance documents on the FM O&amp;G Inglewood Oil Field web site and/or the County DRP web site. The FM O&amp;G Inglewood Oil Field web site is a requirement under Provision J.2 of the CSD and is a separate informational resource from the DRP web site. Members of the public can also attend the monthly CAP meetings which are facilitated in an open forum format whereby questions and comments are welcome by any attendee. In addition, the annual community meeting presents an opportunity for the public to get updates on oil field operations.</p>
<p style="text-align: center;">CHC-5 Community Health Councils</p>	<p style="text-align: center;">Administrative</p>	<p style="text-align: center;">Notification and review time of oil field documents.</p>	<p>As discussed at CAP meeting, the County has worked with the CAP membership to assure that adequate time has been made available for review and comment on the Periodic Review. All comments on the Periodic Review were responded to and included in the appendices of the document. The County does not restrict review of information compliance documents such as the complaint log, CAP members and members of the public may provide comment or questions on these documents at any time.</p>

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
<p style="text-align: center;">CHC-6 Community Health Councils</p>	<p style="text-align: center;">Administrative</p>	<p style="text-align: center;">CAP membership and attendance.</p>	<p>Issues with CAP membership and attendance have been discussed at recent CAP meetings. The Director of DRP recently sent a letter out to CAP members reminding them of their obligations as a member of the CAP. The County is amenable to facilitating new CAP membership as applicable. Request for a joint CAP/MACC meeting acknowledged and the issue has been discussed at CAP meetings. Regarding the FM O&amp;G representative for the CAP meetings, FM O&amp;G is in compliance with the provisions of the CSD regarding the designation of an ombudsperson.</p>
<p style="text-align: center;">CHC-7 Community Health Councils</p>	<p style="text-align: center;">Operations</p>	<p style="text-align: center;">Request for fire prevention study.</p>	<p>Comment on the City of Culver City's concern for the potential of wild fires is acknowledged. It is beyond the scope of the Periodic Review and the provisions of the CSD to required Southern California Edison, City and County Fire Departments to conduct a study on fire prevention at the oil field. CSD provisions E.1, <i>Fire Protection and Response</i>, and F.4, <i>Annual Emergency Response Drills of the County and Culver City Fire Departments</i>, provide requirements for emergency response and preparedness for wild fire emergencies.</p>



## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
<p>CHC-8 Community Health Councils</p>	<p>Air Quality</p>	<p>Request for additional air quality monitoring.</p>	<p>The Inglewood Oil Field is subject to SCAQMD Rule 1173, <i>Fugitive Emissions of Volatile Organic Compounds</i>. As described in Section (a) of the regulation, “<i>the rule is intended to control volatile organic compounds leaks from valves, fittings, pumps, compressors, pressure relief devices, diaphragms, hatches, sight-glasses, and meters at refineries, chemical plants, oil and gas production fields, natural gas processing plants, and pipeline transfer stations</i>”. Therefore, monitoring for volatile organic compounds is being conducted at the oil field and is accomplished by a third party inspector on a quarterly basis. Results of the inspections are submitted and reviewed by the SCAQMD. The air monitoring equipment at the gas plant and the portable monitors that are stationed near the drilling equipment are capable of detecting a spike in emissions and are designed to alarm should one be detected. Please note that the documents noted in the comment are referencing unconventional natural gas development techniques such as hydraulic fracturing for the extraction of natural gas from shale deposits. This type of natural gas extraction is not used at the Inglewood Oil Field.</p>

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
CHC-9 Community Health Councils	Noise	Request that noise peak levels and noise monitoring methodology be re-evaluated.	Noise monitoring was re-evaluated during both the Settlement Agreement and for the Annual Well Increase Evaluation (December 2010). In addition, the Department of Public Health provided input during the preparation of the Periodic Review and did not recommend any changes to the monitoring program. A noise “spike” such as an instantaneous banging of pipe may not be captured by the hourly averaged noise monitoring program, however, a persistent nuisance type noise would be indicated in the monitoring. In addition, the complaint process under Provision F.7 provides for public input and documentation of noise issues.
CHC-10 Community Health Councils	Landscaping	Landscaping effort should be enhanced and accelerated.	The County agrees with the comment that additional landscaping would help with both dust control and the visual aesthetics of the oil field. The Draft Periodic Review recommends accelerating the schedule for the landscaping program.
CHC-11 Community Health Councils	Operations	Unconventional well completion techniques should be evaluated.	Comment on the concern for certain enhanced oil recovery techniques is acknowledged, however, note that the well completion technique hydraulic fracturing is not being used at the Inglewood Oil Field. Down-hole well completion techniques are regulated by DOGGR and are outside the scope of the Periodic Review. The County notes that the chemicals used in well completions at the oil field are reported to the SCAQMD under Rule 1148.2 and the data is available to the public via the SCAQMD Rule 1148.2 web portal.
CHC-12 Community Health Councils	Operations	Request for land for park expansion.	CSD Provision G.7, <i>Periodic Review</i> , requires the County to conduct a comprehensive review of the provisions of the CSD to determine if the measures are “adequately protecting the health, safety, and general welfare”. The potential conversion of the Inglewood Oil Field to park land is outside the scope of the Periodic Review.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
CHC-13 Community Health Councils	Operations	Request to concentrate well activities away from oil field boundaries.	CSD Provision G.7, <i>Periodic Review</i> , requires the County to conduct a comprehensive review of the provisions of the CSD to determine if the measures are “adequately protecting the health, safety, and general welfare”. The CSD does not require the operator to shrink the size of the oil field, therefore, such a recommendation is outside the scope of the Periodic Review.
<b>Agencies</b>			
CUL-1 Culver City	Operations	Request to prohibit certain well stimulation methods.	Comment acknowledged, however, down-hole operations such as well completions including hydraulic fracturing is outside the scope of the regulatory jurisdiction of the County. Down-hole operations are regulated by DOGGR.
CUL-2 Culver City	Landscaping	Landscaping effort is behind schedule.	The County agrees with the comment that additional landscaping would help with both dust control and the visual aesthetics of the oil field. The Periodic Review recommends accelerating the schedule for the landscaping program.
CUL-3 Culver City	Administrative	Request that resources be made available for environmental studies.	The County notes that most studies conducted for the CSD did not have any limitations regarding resources; examples include the EIR, the Settlement Agreement, and the Annual Well Increase Evaluation. In addition, during development of the scope for the Air Quality Study, additional funds were requested and obtained to augment the original budget. Although additional resources may enhance a particular study, the County has determined that the studies conducted to date for the Inglewood Oil Field have been more than adequate to reflect the impacts associated with operation of the oil field.

## Periodic Review Public Draft Comments

Comment #	Issue Area	Brief Description	Response
CUL-4 Culver City	Administrative	Request that public noticing be enhanced.	Oil field activities and compliance with the CSD are discussed at the monthly CAP meetings. Notice of the CAP meetings is accomplished by email of the meeting agenda to CAP members and interested members of the public. As CAP members are representatives of various neighborhood and community groups, it is expected that the CAP members provide information and notice of issues of interest to those groups. In addition, the County and FM O&G web sites contain a substantial amount of information on the oil field and CSD compliance.
CUL-5 Culver City	Administrative	Request for greater public notification of oil field operations.	One of the main purposes of the CAP is to provide a forum for discussion of oil field activities and issues. As the CAP meets monthly, sufficient opportunity for the public to obtain information about the oil field exists. Further, the Periodic Review and EQAP Audit reports provide an overview of the compliance status of all the provisions of the CSD and is a public document.
CUL-6 Culver City	Geology	Request for consultant review of ground monitoring survey data and reports.	The issue of ground movement, oil production pressure, oil field water injection pressure, and reservoir balance was discussed at the March 27, 2014 CAP meeting. Mr. Michael Montgomery from the County provided a presentation on the subject and was assisted by DOGGR representatives John Geroch and Jason Marshall. DOGGR is currently reviewing the subject and has requested that FM O&G provide more data in an effort to better understand the relationship between ground movement and oil field activities. Additional information will be provided at the conclusion of the DOGGR study.

## Periodic Review Public Draft Comments

<b>Comment #</b>	<b>Issue Area</b>	<b>Brief Description</b>	<b>Response</b>
CUL-7 Culver City	Administrative	Request for joint CAP/MACC meeting.	No regulatory mechanism exists to require other MACC agencies to agree to involve the public in the annual MACC process which, by design, is intended to be an internal agency compliance review as opposed to a public forum.
CUL-8 Culver City	Operations	Surrounding neighborhood should be included in emergency response plans.	The Emergency Response Plan for the oil field is subject to review the following agencies: DOGGR, California Department of Fish and Wildlife Office of Spill Prevention and Response (OSPR), U.S. Environmental Protection Agency Region 9, California State Lands Commission Marine Facilities Division Planning Branch, and the U.S. Department of Transportation Office of Pipeline Safety. The ERP is utilized in annual drills as required by CSD Provision F.4. The evacuation routes for the surrounding neighbors and neighborhoods is outside the scope of the oil field ERP and the CSD. The public is encouraged to contact their neighborhood Fire Department for assistance on planning evacuation routes.
CUL-9 Culver City	Administration	Periodic Review should include discussion on new technology to reduce offsite impacts.	The County has provided a discussion on new technology for each provision of the Periodic Review as applicable.
CUL-10 Culver City	Administration	Comments detailed in the Community Health Councils comment letter are included by reference to the Culver City comments.	The fact that the City of Culver City supports and incorporated by reference the following comments on the Periodic Review is acknowledged: Community Health Councils, Natural Resources Defense Council, the City Project, and Mujeres de la Tierra comment letter dated April 28, 2014; comments submitted by John Kuechle, via email and letter on April 6, 2014; and the comment letter submitted by Kenneth Kutcher on April 25, 2014.
CUL-11 Culver City	Operations	Request to prohibit certain well stimulation methods.	Down-hole operations such as well completions including hydraulic fracturing is outside the scope of the regulatory jurisdiction of the County. Down-hole operations are regulated by DOGGR.

## Periodic Review Public Draft Comments

<b>Comment #</b>	<b>Issue Area</b>	<b>Brief Description</b>	<b>Response</b>
CUL-12 Culver City	Landscaping	Landscaping effort should be enhanced.	The County agrees with the comment that additional landscaping would help with both dust control and the visual aesthetics of the oil field. The Draft Periodic Review recommends accelerating the schedule for the landscaping program.
CUL-13 Culver City	Administrative	Request that resources be made available for environmental studies.	The County notes that most studies conducted for the CSD did not have any limitations regarding resources; examples include the EIR, the Settlement Agreement, and the Annual Well Increase Evaluation. In addition, during development of the scope for the Air Quality Study, additional funds were requested and obtained to augment the original budget. Although additional resources may enhance a particular study, the County has determined that the studies conducted to date for the Inglewood Oil Field have been more than adequate to reflect the impacts associated with operation of the oil field.
CUL-14 Culver City	Administrative	Request for greater public notification of oil field operations.	See response to CUL-5.
CUL-15 Culver City	Geology	Request for additional resources for the ground monitoring survey data and reports.	The issue of ground movement, oil production pressure, oil field water injection pressure, and reservoir balance was discussed at the March 27, 2014 CAP meeting. Mr. Michael Montgomery from the County provided a presentation on the subject and was assisted by DOGGR representatives John Geroch and Jason Marshall. DOGGR is currently reviewing the subject and has requested that FM O&G provide more data in an effort to better understand the relationship between ground movement and oil field activities. Additional information will be provided at the conclusion of the DOGGR study.

## Periodic Review Public Draft Comments

<b>Comment #</b>	<b>Issue Area</b>	<b>Brief Description</b>	<b>Response</b>
CUL-16 Culver City	Administrative	Request for joint CAP/MACC meeting.	No regulatory mechanism exists to require other MACC agencies to agree to involve the public in the annual MACC process which, by design, is intended to be an internal agency compliance review as opposed to a public forum.
CUL-17 Culver City	Operations	Surrounding neighborhood should be included in emergency response plans.	See response to CUL-8.
CUL-18 Culver City	Air Quality	Concern on GHG gas issue and GHG emissions of oil field.	The City of Culver City concern on GHG gases, GHG emission from drilling activities at the oil field, and the State GHG legislation and goals is acknowledged.
CUL-19 Culver City	Administration	Periodic Review should include discussion on new technology to reduce offsite impacts.	The County has provided a discussion on new technology for each provision of the Periodic Review as applicable.
CUL-20 Culver City	Administration	Request for more analysis on CSD Provisions G.4 and G.5.	The CSD does not determine the amount of insurance required under Provision G.4 or the performance bond amount required under Provision G.5; the financial and technical requirements of these provisions are determined by the County CEO. As part of the Periodic Review, the County evaluated Provisions G.4 and G.5 and may perform additional review at any time independent of the Periodic Review process.
CUL-21 Culver City	Administration	CAP membership and attendance.	Issues with CAP membership and attendance have been discussed at recent CAP meetings. The Director of DRP recently sent a letter out to CAP members reminding them of their obligations as a member of the CAP. The County is amenable to facilitating new CAP membership as applicable.
CUL-22 Culver City	Administration	Request to strengthen the recommendations made in the Periodic Review.	Recommendations will be made to the Hearing Officer to decide how to move forward with the results and recommendations of the Periodic Review.
CUL-23 Culver City	Administration	Periodic Review language clarification.	Recommendations to the provisions of the CSD can be made during each Periodic Review process, thus either of the two referenced language styles are correct.

# BALDWIN HILLS CSD PERIODIC REVIEW

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## PXP Inglewood Oil Field

# EFFECTIVENESS REVIEW OF BALDWIN HILLS CSD PROVISIONS – 2014 –

AMP = Air Monitoring Plan  
CAN = Community Alert System  
CSD = Community Standards District  
DP = Drilling Plan  
ECP = Erosion Control Plan  
EQAP = Environmental Quality Assurance Program  
FDCP = Fugitive Dust Control Plan  
FDSP = Fugitive Dust Sign Plan

FPA = Fire Protection Audit  
GMP = Groundwater Monitoring Program  
MSO = Meteorological Station Operation  
OMP = Odor Minimization Plan  
QMDP = Quiet Mode Drilling Plan  
TLDC = Tank Leak Detection and Containment  
TSA = Tank Seismic Assessment



## BALDWIN HILLS CSD PERIODIC REVIEW

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
D.	Area Specific Development Standards	Operational Limits	
D.1	Operational Limits	No oil field activities have occurred in the areas limited by the provision.	No Change
E.	Oil Field Development Standards		
E.1.a	Develop a CAN system (reverse dialing system) within 120 days following effective date and test annually.	The CAN system plan was approved by the LA County Fire Department on 2/18/10 to be installed by 9/17/10. PXP (FM O&G) implemented a vendor (CodeRED) supplied reverse dialing system on 9/16/10. The CAN system was successfully tested on 12/10/10, 11/22/11, and 12/19/12. Annual CAN testing conducted by the operator, FM O&G, included only first responders and affiliated agencies such as Culver City, and did not include the entire notification list. No residents or local businesses were included in the annual tests. The operator has confirmed that additional contacts can be added to the annual test list. It is recommended that FM O&G conduct annual testing which includes residents - CAP members and other interested residents at the very least - and that FM O&G prepare a message for the testing similar to the message utilized for the Emergency Broadcast System. The message would clearly state a test is being conducted, and that in the event of an actual emergency the listener would be directed what to do and where to obtain more detailed information.	Modification to Implementation
E.1.b	Conduct annual spill containment response training.	The Spill Prevention, Control, and Countermeasure (SPCC) Plan was updated in 2011. Annual spill containment response training occurred on February 17 and April 10, 2010, October 26, 2011, and February 1, 2012.	No Change
E.1.c	Operator to maintain, implement and comply with an emergency response plan.	The ERP was approved with updates for biological resources on 3/31/10. Annual emergency response drills have taken place on November 24, 2009, October 26, 2011, and February 1, 2012.	No Change
E.2.a	Operator to obtain emission offsets, or reclaim credits for applicable new emission sources.	To date, the oil field has obtained five SCQAMD permits; one for the new flare and four for the installation of new tanks. None of these permits required emission offsets or the purchase of RECLAIM credits.	No Change
E.2.b	No new gas plant or flare to be installed at steam drive plant. Operator to connect steam drive plant to existing gas plant.	Provision has not been implemented to date because a new gas plant or new steam drive plant has not been proposed or installed.	No Change

## BALDWIN HILLS CSD PERIODIC REVIEW

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
E.2.c	Operator to comply with odor minimization plan.	The Odor Minimization Plan was approved on 2/25/09 and revised in April 15 2010 with training occurring annually. Odor suppressants are in use at drilling sites and bioremediation farms.	No Change
E.2.d	Operator to comply with air monitoring plan.	The Air Monitoring Plan was approved on 2/29/09 with current revision dated 1/4/10. Training on plan occurs annually. The air monitoring systems have been installed and the air monitoring criteria have not been exceeded to date. Therefore, neither the drilling nor the gas plant corrective actions required by this subsection have been necessary to implement.	No Change
E.2.e	Ensure mud-gas separator vessel (i.e., gas buster) and portable flare are installed and ready for use, if needed.	All drilling sites utilize a gas buster and portable flare system. The system was approved and permitted by the SCQAMD. The system has not been required to be activated to date.	No Change
E.2.f	Within 180 days following effective date, ensure tanks have a fully operational pressure monitoring system.	System has been installed based on SCQAMD inspection results and review of breakdown reports. System is subject to SCQAMD fugitive emission rules.	No Change
E.2.g	Use odor suppressant(s) for bioremediation farms.	Use of odor suppressants at bioremediation farms verified by field inspections. Odorant applied as needed manually with sprinkler type system. Bioremediation farms currently not operating due to SCQAMD violation for odors.	No Change
E.2.h	Spray muds and cuttings passing through mud shakers with odor suppressant.	The installation of the odor suppressant system at drilling sites has been documented during field visit inspections. Odorant is supplied by overhead sprinkler mister system above the mud shakers.	No Change
E.2.i	Contain produced water and oil within closed systems at all times, except for sampling.	System has been installed based on SCQAMD inspection results and review of breakdown reports. System is subject to SCQAMD fugitive emission rules.	No Change
E.2.j	Operator to maintain and operate a meteorological station at oil field.	The application for the installation of the meteorological monitoring system was approved by the SCAQMD on 7/21/09, the system was installed and tested in December 2009 and was operational on January 21, 2010. Data is collected and stored on a data collection system and reviewed monthly. Sensors are calibrated annually by vendor technicians.	No Change
E.2.k	Updated health risk assessment.	The requirement is to update facility health risk assessment with 5 years of site specific meteorological data should the data indicate the potential for significant change in the results. The data collection	No Change

## BALDWIN HILLS CSD PERIODIC REVIEW

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
		period has not reached the required 5 years. Thus, this provision has not been implemented to date.	
E.2.l	Utilize Tier III or better diesel engines plus 3 CARB verified diesel catalysts during drill pad construction.	Off road construction equipment emission control certifications are on file with the County.	No Change
E.2.m	Utilize CARB/EPA Certification Tier or better certified engines, or other methods approved by CARB as meeting or exceeding the Tier II standard.	Drill rig engine emission control certifications are on file with the County.	No Change
E.2.n	Meet drilling and re-drilling setbacks of 400 feet from developed areas and 20 feet from roadways.	All drill site locations are reviewed prior to approval of annual drilling plan approval.	No Change
E.2.o	Ensure no overlap in major facility construction and installation activities, such as steam drive plant, water processing facility, or oil cleaning plant.	Condition has not been required to be implemented to date because no major facility construction projects have been proposed or approved.	No Change
E.2.p	Operator to comply with fugitive dust control plan.	The Fugitive Dust Control Plan was approved on March 26, 2009. Site inspections have documented compliance with watering of unpaved roads with two water trucks in operation during normal business hours. Two of the three total dust complaints received to date occurred when wind speeds were documented at over 30 mph and an AQMD wind advisory was issued.	No Change
E.3.a	Ensure natural gas liquids are blended with the oil to the maximum allowable pipeline system vapor pressure.	All (100%) natural gas liquids are blended with the oil.	No Change
E.3.b	Within 90 days following the effective date, Operator to install and maintain fire-proofing insulation on all propane and natural gas liquids bullets.	The propane and natural gas liquids bullet fire proofing was completed on February 23, 2009 and with the associated documentation submitted to the LA County Fire Department on February 25, 2009. Compliance with NFPA Requirements, the County Fire Code, County Fire Department Regulations, California Code of Regulations, and API Requirements was documented in the PXP 2009 Third Party Audit of Fire Protection Capabilities at Inglewood Oil Field report.	No Change

## BALDWIN HILLS CSD PERIODIC REVIEW

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
E.3.c	Ensure steam drive plant meets 1,000-foot setback from developed area.	Condition has not been required to be implemented to date because no steam drive plant project has been proposed or approved.	No Change
E.3.d	Within one year following the effective date, ensure existing and new oil tank areas have secondary containment (berms and/or walls)	The PXP 2009 Tank Leak Detection and Containment at Inglewood Oil Field report, approved in May 2009, documented that all tanks have secondary containment. The PXP Retention Basin Study, completed in March 2009 and revised in September 2009 and January 2010, analyzed and modeled the capacities of the basins along with a 100 year storm event and determined the basins have adequate capacity.	No Change
E.4.a	Ensure grading involving up to 5,000 cubic yards is part of an approved master grading plan.	All grading at the oil field has been reviewed and approved by the County Public Works Department by the annual submittal of a master grading plan, submitted in October or November of each year.	No Change
E.4.b	Ensure a site-specific geotechnical investigation is completed for grading in excess of 5,000 cubic yards.	Site specific geotechnical investigations for grading have not been required because all grading projects at the oil field to date have been 5,000 cubic yards or less. Geotechnical reports have been prepared for permanent structures such as new tank installations; the reports were submitted to County Regional Planning and Building & Safety departments.	No Change
E.4.c	Within 180 days following the effective date, submit an erosion control plan.	The Erosion Control Plan was approved on 5/27/210.	No Change
E.4.d	Ensure slopes are restored to original grade once use discontinued.	Restoration of slopes at the oil field from grading activities has been completed consistent with the erosion control plan and the master grading plan.	No Change
E.4.e	Ensure operator conducts ground movement survey at least once every 12 months and results are forwarded to DOGGR and the public works director.	Ground movement surveys have been completed annually as required pursuant to the Accumulated Ground Movement Plan approved by County Public Works on November 10, 2009. Annual survey reports completed in April 1010 (Baseline Survey), December 2010, April 2011 (revised February 2012), May 2012, August 2013, September 2013, and October 2014 were submitted to DOGGR and the County Public Works Department.	No Change
E.4.f	Ensure no permanent structure is constructed in an Alquist-Priolo Fault Zone with a certified fault study.	No permanent structures have been constructed in an Alquist-Priolo Fault Zone since the adoption of the CSD; therefore, this provision has not been implemented.	No Change

## BALDWIN HILLS CSD PERIODIC REVIEW

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
E.4.g	Ensure operator maintains an accelerometer, records and transmits readings to the Caltech Seismological Laboratory.	The accelerometer seismic station was operational and collecting data on 5/20/09. Data is transmitted by cell link to the CalTech Seismological Laboratory.	No Change
E.4.h	Ensure operator maintains a pipeline management plan.	The pipeline management plan was submitted to DOGGR as required in December 2009, it has not been necessary to update the plan to date.	No Change
E.4.i	Ensure operator has a qualified paleontologist monitoring all rough grading and other ground disturbing activities.	Three projects have triggered the paleontological requirements of this subsection. The surveys were performed by an environmental consulting firm with a County approved Registered Geologist with expertise in paleontology. Results of the surveys for the three projects did not indicate any items of potential paleontological interest.	No Change
E.5.a	Ensure A-weighted equivalent noise levels do not elevate above existing baseline levels by more than five dBA.	No measured noise levels above the criteria have been attributed to oil field operations to date.	No Change
E.5.b	Turn off audible mobile equipment and truck backup alarms between the hours of 8:00 p.m. and 8:00 a.m.	Results of annual EQAP audits and interviews with drilling staff indicate back up alarms are turned off during QMDP activities.	No Change
E.5.c	Quiet Mode Drilling Plan	The QMDP was submitted in February 2009 and revised in April, July and September 2009. Noise minimization measures in the plan are checked during drilling site inspections. Drill rig operations staff reviews the QMDP prior to each shift during "tailgate" safety meetings.	No Change
E.5.d	Ensure noise-producing equipment is regularly serviced, repaired and logged.	Maintenance log for noise producing equipment is reviewed during annual EQAP audits. The 2012 audit recommended improved documentation for these records.	No change
E.5.e	No deliveries (equipment, trucks, vacuum trucks, tools or materials) between 8:00 p.m. and 7:00 a.m. and on Sundays or legal holidays 8:00 p.m. and 9:00 a.m., except in cases of an emergency.	Requirement is checked during annual EQAP audits and signage on the delivery restrictions is posted at main facility access gates.	No change

## BALDWIN HILLS CSD PERIODIC REVIEW

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
E.5.f	No deliveries to the drill site within 500' of a residential property between 5:00 p.m. and 7:00 a.m. and on Sundays or legal holidays 5:00 p.m. and 9:00 a.m., except in cases of an emergency.	Requirement is checked during annual EQAP audits and signage on the delivery restrictions is posted at main facility access gates. Vendors and oil field staff involved with unloading are reminded of noise minimization measures to avoid unnecessary noise such as banging of pipes.	No change
E.5.g	Ensure no permanent structures are constructed between 7:00 p.m. and 7:00 a.m. or during Saturdays, Sundays, or legal holidays.	The oil field operator complies with the time limits for construction of permanent structures, no construction occurs after 7:00 p.m. and before 7:00 a.m., or during Saturdays, Sundays, or legal holidays.	No change
E.5.h	Construction equipment selected for low noise output.	Equipment is serviced and is properly muffled pursuant to the manufacturer's specifications.	No change
E.5.i	Prohibit idling of construction equipment with internal combustion engines.	Construction equipment operators are trained on noise minimization measures are discussed at "tail gate" briefings and the unnecessary idling of construction equipment is discussed.	No change
E.5.j	Operator to instruct employees and subcontractors about noise provisions and shall annually certify to such to the director.	Noise minimization measures are discussed at "tail gate" briefings prior to the start of projects and all employees and sub-contractors are trained to comply with the noise provisions each year during annual certification training. Training records are checked during the annual EQAP audit process.	No Change
E.6	Ensure operational vibrations are minimized and do not exceed a velocity of 0.25 mm/s over the frequency range 1 to 100 Hz.	The results of the vibration monitoring completed for the EIR prepared for the development of the CSD showed no operational vibrations above the specified criteria. However, the monitoring results suggested the installation of a new flare to minimize potential vibration issues, the installation of the new flare was completed in 2013. The County has not deemed additional monitoring for vibration necessary.	No Change
E.7.a	Operator to comply with ERP for oil spill response to protect biological resources.	The ERP was approved with updates for biological resources on 3/31/10. Annual emergency response drills have taken place on November 24, 2009, October 26, 2011, and February 1, 2012.	No Change
E.7.b	Ensure operator complies with the special status species and habitat protection plan.	The Special Status Species and Habitat Protection Plan was approved on 11/15/10. Compliance with the plan is documented in Special Status Species Compliance Reports with reports prepared for the years 2011 and 2012.	No Change

## BALDWIN HILLS CSD PERIODIC REVIEW

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
E.7.c	Ensure operator complies with the habitat restoration and revegetation plan.	Disturbance to sensitive habitat areas has not reached the one acre total trigger for implementation of the restoration plan requirements to date. Therefore, this provision has not been implemented.	No Change
E.7.d	Ensure operator has the following surveys conducted by an approved professional: sensitive plant survey, sensitive wildlife survey, breeding and nesting bird survey, and wetland delineation survey.	Pre-construction surveys have been completed for applicable projects and are documented in the annual Special Status Species Compliance Reports.	No Change
E.7.e	Ensure operator complies with applicable federal and state regulations if listed plant or wildlife species are found, and for any tree and riparian scrub removal.	Review of 2012 Special Status Species Compliance Report documents compliance.	No Change
E.7.f	Ensure operator complies with the habitat restoration and revegetation plan.	Disturbance to sensitive habitat areas has not reached the one acre total trigger for implementation of the restoration plan requirements to date. Therefore, this provision has not been implemented.	No Change
E.7.g	Tree and riparian scrub removal.	Vegetation removal activities are documented in the annual Special Status Species Compliance Reports.	No Change
E.7.h	Habitat restoration.	Disturbance to sensitive habitat areas has not reached the one acre total trigger for implementation of the restoration plan requirements to date. Therefore, this provision has not been implemented.	No Change
E.8.a	Operator to ensure that oil operations do not impact the Cone Trust House.	The Cone Trust House and surrounding area are off limits to oil field staff to prevent any impacts to the historic building. A discussion of the significance of the Cone Trust House is included in the cultural resources sensitivity training of the oil field archaeological training program.	No Change
E.8.b	Operator to provide archaeological training to construction personal involved in ground disturbance activities.	The archeological training program was initially conducted on May 26, 2009 and is a component of the annual training program for oil well facility staff and sub-contractors.	No Change

## BALDWIN HILLS CSD PERIODIC REVIEW

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
E.8.c	Ensure operator complies with the construction treatment plan.	The Construction Treatment Plan was submitted in May 2009, revised in July 2010, and approved on 1/24/11. To date one incident has required the implementation of the Inadvertent Cultural Resource Discovery procedure contained in the plan. On November 9, 2010 during the preparation of the well pad two headstones were unearthed which were later determined to not be of cultural significance.	No Change
E.9.a	Ensure outdoor lighting is restricted to only those lights that are required by code for the lighting of building exteriors, drilling, and redrilling rigs and for safety and security needs and screened downward to prevent offsite lighting spill over.	The lighting fixtures at the oil field are screened to orient the light downward toward the area requiring illumination as feasible. Other lighting, such as security lighting at the office building, uses hood type screening fixtures to focus the light downward. Lighting at drill sites is the minimum lighting necessary for safe operations.	No Change
E.9.b	Ensure a lighting plan has been approved for each new permanent structure.	No new permanent structures requiring a lighting plan have been proposed by FM O&G, therefore, this provision has not been activated to date.	No change
E.10	Ensure operator complies with the approved conceptual landscaping plan.	The Landscaping Plan Inglewood Oil Field was first submitted in May 2009 and was revised in November 2010 and outlines seven phases of landscaping effort. Landscaping for Phase 1 and 2 has been completed for areas at the Ladera Crest residential view shed looking north and along the Windsor Hills/La Brea traffic corridor view shed, respectively. Phase 3 outlines plans for the Ladera Crest residential view shed looking east, Phase 4 and 5 involve a roadway buffer along La Cienega Boulevard. The plans for Phases 3, 4, and 5 have been approved by the County with work for Phase 5 scheduled to start in January 2014. Phase 6, a landscape buffer for the Fairfax Avenue roadway and Phase 7, a landscaping buffer for Stocker Street have been prepared in draft form and are posted on the oil field web site. Landscaping progress at Phases 1 and 2 has been periodically reviewed by the County ECC during site inspections. <i>It is recommended that FM O&amp;G schedule installation of remaining landscaping phases to achieve the landscaping required by this provision in a timely manner.</i>	Modification to Implementation
E.11.a	Oil Field Waste Removal Waste Collection	Waste generated by drilling, redrilling, and reworking activities is collected in bins, in the ground sumps are not used at the oil field.	No Change



## BALDWIN HILLS CSD PERIODIC REVIEW

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
E.11.b	Oil Field Waste Removal Waste Discharge	Oil field waste is collected in bins and is not discharged to the ground. The PXP Retention Basin Study documented that the retention basins on site have sufficient capacity to handle a worst case spill event and a 100 year storm event.	No Change
E.11.c	Oil Field Waste Removal Recycling Plan	The PXP Recycling Plan Inglewood Oil Field was approved on October 3, 2011	No Change
E.12	Construction of Private Roads	No private roads have been constructed to date and all oil field activities utilize existing access roads, therefore, this requirement has not been activated to date.	No Change
E.13.a	Signs Perimeter Identification Signs	Signs have been installed as required and the maintenance of the signs is documented by site inspections and annual EQAP audits.	No Change
E.13.b	Signs Main Entrance Sign	Signs have been installed as required and the maintenance of the signs is documented by site inspections and annual EQAP audits.	No Change
E.13.c	Other Required Signs	Signs have been installed as required and the maintenance of the signs is documented by site inspections and annual EQAP audits.	No Change
E.13.d	Well Identification Signs	Signs have been installed as required and the maintenance of the signs is documented by site inspections and annual EQAP audits.	No Change
E.13.e	No Littering Signs	Signs have been installed as required and the maintenance of the signs is documented by site inspections and annual EQAP audits.	No Change
E.14	Painting	The painting of the Inglewood Oil Field structures and equipment was completed on November 12, 2012. The paint color, licorice, was chosen with assistance of a landscape architect and was approved by the LA County Board of Supervisors. The maintenance of the painting and coatings of the equipment and structures at the oil field is a continuous process and FM O&G employs a full time painter to maintain the coatings on the structures and equipment at the oil field.	No Change
E.15.a	Sumps Sump Clean Out	All historical sumps that existed on site were cleaned out, filled in with clean soil, and re-graded to match the surrounding topography in 2007. In the ground sumps are no longer in use at the facility.  <i>It is recommended that the Operator continue the use of metal and or plastic bins and tanks consistent with current practice as the elimination of the use of below ground sumps is considered to be a significant environmental benefit.</i>	Modification to Implementation
E.15.b	Sumps Sump Fencing	Sumps are no longer in use at the oil field; therefore, sump fencing is not required.	No Change

## BALDWIN HILLS CSD PERIODIC REVIEW

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
E.16	Well Cellars - construction	Well cellar construction is inspected by DOGGR for compliance with applicable regulations.	No Change
E.16.a	Well Cellars Cellar fluids	Well cellars are kept free of fluids and are checked daily by oil field staff. Vacuum trucks are available on site to remove fluids if necessary.	No Change
E.16.b	Well Cellars Multi cellar access	The oil field does not contain any multi well cellars; all well cellars are of the single well cellar type; therefore, this subsection does not currently apply to any existing oil field structures.	No Change
E.16.c	Well Cellars Single Cellar covers	All well cellars in the oil field are covered with an open grating and surrounded with fencing to prevent vehicle access. The well fencing includes signage depicting the name of the well per the requirements listed Provision E.13.d.	No Change
E.16.d	Well Cellars Cellar Ladder Openings	None of the wells require cellar ladder openings due to the shallow depth of the cellars; therefore this subsection does not currently apply to any existing oil field structures.	No Change
E.17.a	Construction Storm Water Pollution Prevention Plan	The SWPPP is updated as needed and submitted to the RWQCB and the County Public Works Department for review and approval. Recent updates to the SWPPP have been submitted annually along with the Master Grading Plan, the current SWPPP is dated August 2013.	No Change
E.17. b	SPCCP	The SPCCP plan is updated every five years and implemented as a training exercise annually; the most recent spill containment response training was completed on February 1, 2013	No Change
E.17.c	Hydrologic Analysis	The hydrologic analysis requirement has not been implemented to date because no oil field projects have triggered the requirement.	No Change
E.18	Water Management Plan	Plan completed May 2009, revised in December 2010, revised in June 2011. The plan includes water conservation measures for office, landscaping, operations, and maintenance water uses. The plan also includes a section on employee awareness to encourage water conservation.	No Change

## BALDWIN HILLS CSD PERIODIC REVIEW

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
E.19	Groundwater Monitoring	Groundwater Monitoring Program and Work Plan approved August 2009. Five monitoring wells installed down gradient of each surface water basin, installed between January and March 2010 and quarterly groundwater Monitoring Reports began in 2010. <i>Based on comments by the RWQCB regarding potential additional monitoring locations, it is recommended that the Operator coordinate with the RWQCB and install additional groundwater monitoring wells if deemed necessary.</i>	Modification to Implementation
E.20	Fencing	The chain link fencing at the Inglewood Oil Field meets the DOGGR requirements of the provision. <i>Due to un-authorized access through damaged fencing it is recommended the ECC and the Operator increase monitoring of the condition of the perimeter fencing.</i>	Modification to Implementation
E.21.a	Oil Field Cleanup and Maintenance Equipment Removal	The Unused or Abandoned Equipment Removal Plan Inglewood Oil Field describes the equipment removal activities completed since the adoption of the CSD. Sixty four pieces of equipment were removed in 2008 and 2009. The Plan was recently updated in December 2012.	No Change
E.21.b	Oil Field Cleanup and Maintenance Equipment Maintenance	All oil field equipment maintenance is tracked and scheduled with a vendor supplied computer based maintenance management program. The operator also conducts daily equipment checks and annual internal safety audits.	No Change
E.21.c	Oil Field Cleanup and Maintenance Site Debris and Vegetation	Outside storage of equipment at the oil field is consistent with this requirement and typical for an oil and gas operation.	No Change
E.22	Security	Gates at the oil field are consistent with these regulations and all unmanned entrances are equipped with the required sliding type gates. Current security at the oil field includes a 24 hour guard at the main entrance gate to the field off of Stocker Street and a guard at the entrance to the field and offices off of Fairfax Street.	No Change
E.23	Vehicle Parking	The oil field contains sufficient parking for all employee, subcontractor, visitor, and heavy equipment vehicles. Marked parking spaces at the office building and warehouse areas are consistent with County code requirements. No vehicles associated with oil field operations park off site, therefore, parking of vehicles for oil field operations does not impact any public parking facility.	No Change
E.24.a	Sanitation Garbage and Refuse	Garbage and refuse are picked and removed weekly by a subcontractor garbage collection company. Garbage bins are located at the office, the warehouse, and other locations throughout the oil field.	No Change

## BALDWIN HILLS CSD PERIODIC REVIEW

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
E.24.b	Sanitation Toilets and Wash Facilities	Permanent toilet and wash facilities are located at the office building, the warehouse, the gas plant, the “halfway house” across from the gas plant, and at two modular buildings used by sub-contractors. The restroom facilities are maintained by a sub contractor janitorial service. Portable facilities are located throughout the field and moved as needed, the portable restrooms are maintained by the subcontractor providing the units.	No Change
E.25	Storage of Hazardous Materials	The hazardous materials business plan for the oil field is submitted to the Fire Department for review and approval on an annual basis as required. The hazardous materials storage area is periodically inspected by the Fire Department.	No Change
E.26. a	Drilling, Redrilling, & Reworking DOGGR Regulations	All drilling operations at the oil field are inspected by DOGGR to ensure compliance with these state regulations. The County permit for drilling requires DOGGR permit.	No Change
E.26. b	Drilling, Redrilling, & Reworking Number of drilling & redrilling rigs	In compliance, currently one rig in use at the field and the maximum number of rigs since the adoption of the CSD has been two.	No Change
E.26.c	Drilling, Redrilling, & Reworking Annual drilling plan	Plans have been submitted annually per the requirements with the plans reviewed and approved by the County prior to the subject drilling year. The 2014 plan was approved in October 2013. <i>In consideration of the usefulness and substantial costs associated with the preparation of the topographic vertical profiles, it is recommended considering removing the subject figures/maps from the Annual Drilling Plan until the information is deemed useful for inclusion in future plans.</i>	Modification to Implementation
E.26.d thru j	Drilling, Redrilling, & Reworking Rig and Fire Safety Requirements	Documented for compliance via County and DOGGR permits, DOGGR inspections and the annual drilling plan review and approval process.	No Change
E.27.a	Processing Operations Limits on Processing Operations	Processing occurring at the oil field is associated with the dehydration of oil and gas, the storage, handling, recycling, and transportation of those materials, water injection operations. The oil field does not need to process hydrogen sulfide or other impurities prior to transportation to offsite refineries.	No Change
E.27.b	Processing Operations Refining	No refining is done at the oil field.	No Change
E.27.c	Processing Operations Well Pump Motors	All well pump motors at the oil field are powered electrically.	No Change

## BALDWIN HILLS CSD PERIODIC REVIEW

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
E.27.d	Processing Operations Submersible Well Pump	Approximately 50 wells at the oil field have been retrofitted with this new technology.	No Change
E.27.e	Processing Operations Removal by pipeline	All oil, gas, and other hydrocarbons produced in the oil field are shipped and transported via pipelines and all natural gas liquids are blended into the oil and thus transported by pipeline.	No Change
E.27.f	Processing Operations Pipelines	No new pipelines that transport oil or gas from the oil field have been constructed since the adoption of the CSD.	No Change
E.27.g	Processing Operations Active Pipeline Plot Plan	The active pipeline plot plan was submitted to the Fire Department on December 9, 2009.	No Change
E.27.h	Processing Operations Machinery Enclosures	The equipment at the oil field complies with the referenced County code requirements under Section 11 for health and safety requirements for hazards.	No Change
E.27.i	Processing Operations Opening Protections	The equipment at the oil field complies with the referenced County code requirements under Section 11 for health and safety requirements for hazards.	No Change
E.28.a	Well Reworking Operations DOGGR Regulations	Wells associated with reworking operations require a permit from DOGGR and thus must meet the applicable well reworking requirements.	No Change
E.28.b	Well Reworking Operations Number of Reworking Rigs	Compliance with the number of reworking rigs at the oil field is documented by weekly email updates to the County listing the number of reworking rigs and the well location of the work, this data is confirmed by periodic site inspections. <i>It is recommended that the Operator facilitate better coordination when scheduling reworking and the other types of rigs at the oil field to avoid concentrating too many rigs in one area.</i>	Modification to Implementation
E.28.c	Well Reworking Operations Hours of Operation	Standard policy for the operation of reworking rigs operation is daylight hours only, operation during non-daylight hours only occurs when necessary to complete a critical task or for an emergency situation and the work is completed prior to 7:00 pm.	No Change
E.28.d	Well Reworking Operations Specifications	Rigs must have a valid Department of Motor Vehicles license and meet the specifications of the American Petroleum Institute (API) to operate in California.	No Change

## BALDWIN HILLS CSD PERIODIC REVIEW

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
E.28.e	Well Reworking Operations Equipment Removal	Reworking rigs are removed from the field to be used elsewhere by the sub contractor owner unless scheduled for use at another well in the oil field.	No Change
E.29.a	Tanks New Tank Specifications	Four new tanks have been constructed since the adoption of the CSD. Construction of the new tanks required County building and land use permits and a South Coast Air Quality Management permit for the vapor recovery system.	No Change
E.29.b	Tanks Set Backs	Three of four tanks constructed were built per the setback requirements. One tank located at the LAI Last Chance tank battery, was built within the setback criteria, however, the tank replaced an existing tank in the same location and therefore the construction was consistent with the requirement.	No Change
E.29.c	Vapor Recovery	The permitting of these tanks included the tank piping, valves, fittings, and connections. Thus, the tanks were built pursuant the agency requirements for new tank specifications. Vapor recovery systems are inspected by the SCQAMD.	No Change
E.29.d	Tanks Specifications for New Tank Piping, Valves, Fittings, and Connections	The permitting of these tanks included the tank piping, valves, fittings, and connections. Thus, the tanks were built pursuant the agency requirements for new tank specifications. Vapor recovery systems are inspected by the SCQAMD.	No Change
E.29.e	Tanks Detection of Tank Bottom Leaks	All tanks at the Inglewood Oil Field have a program to detect tank bottom leaks. The leak detection for all tanks at the oil field consists of either direct view monitoring of the exterior surface and bottom or by the use of tank foundations of either concrete or gravel.	No Change
E.30	Well and Production Reporting	The reports requested by this provision have been submitted annually to the County and Fire Chief as required. Reporting forms are submitted to DOGGR monthly and are compiled for the annual submittal to the County. The County submittal consists of three document packets; Well and Production Report Maps, Well and Production Report Production Forms, and Well and Production Report Injection Forms.	No Change
E.31	Idle Well Testing and Maintenance	Required testing includes the determination of the fluid level of the well and may include other diagnostic tests as required by DOGGR. The testing is documented in an annual report submitted to DOGGR.	No Change

## BALDWIN HILLS CSD PERIODIC REVIEW

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
E.32	Abandoned Well Testing	Abandoned well area hydrocarbon vapor testing has been completed by a third party consultant since the adoption the CSD. Annual reports completed to date, for the years 2009 through 2012, have been submitted to the County and DOGGR.	No Change
E.33	Well and Well Pad Abandonment	DOGGR has not implemented this provision to require the operator to plug and abandon any wells to date. Wells scheduled for plugging and abandonment are included in the Annual Drilling, Redrilling, Well Abandonment and Well Restoration Plan subject to DOGGR and the County review and approval.	No Change
E.34	County Request for Review of Well Status	The County has not directed DOGGR to plug or abandon any wells pursuant to this provision to date; therefore, the requirement has not been activated to date.	No Change
E.35	Reduced Throughput Triggering Review	The provision is intended to be implemented at or near the end of the oil fields project life and therefore has not been activated to date.	No Change
F.	Monitoring and Compliance		
F.1.a	EQAP Steps for Compliance	The EQAP was approved by the County in February 2009 and was revised on August 25, 2009. The document also discusses the steps for compliance of the compliance team consisting of County staff, the Environmental Compliance Coordinator (ECC), the MACC, the CAP, third party consultants and auditors, the ombudsperson, and the oil field operator staff.	No Change
F.1.b	EQAP EQAP Reports	Annual EQAP reports have been prepared and submitted by the operator as required by this provision with the first report completed on March 1, 2010. Subsequent reports have been completed annually.	No Change
F.1.c	EQAP EQAP Updates	The EQAP was revised August 25, 2009.	No Change
F.2	Environmental Compliance Coordinator (ECC)	An ECC position has been funded by the operator as required by this provision since the adoption of the CSD. The ECC's have met the qualification requirements for the position and have been approved by the County.	No Change
F.2.a	Environmental Compliance Coordinator On site monitoring	The ECC's are familiar with the compliance requirements of the CSD and periodic oil field site inspections have been completed and documented.	No Change

## BALDWIN HILLS CSD PERIODIC REVIEW

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
F.2 b	Environmental Compliance Coordinator Employee and Contractor Awareness	Training records are reviewed during annual EQAP audits and during periodic site inspections as necessary.	No Change
F.2.c	Environmental Compliance Coordinator Mitigation Adequacy	Site inspections, annual audits, plan and compliance document review by the ECC assist the County in determining adequacy of the provisions of the CSD.	No Change
F.2.d	Environmental Compliance Coordinator Reporting Responsibilities	The ECC coordinates compliance reporting requirements with the MACC, the CAP, third party consultants and auditors, the ombudsperson, other agencies, and the oil field operator staff.	No Change
F.3.	SIMQAP Requirements	Approved SIMQAP contains the required information listed in F.3.a.i through F.3.a.v. <i>A comprehensive SIMQAP audit has not been conducted to date. It is recommended that a SIMQAP audit be conducted over the next year in coordination with the EQAP audit and that appropriate interested regulatory agencies be noticed of the audit for participation as applicable.</i>	Modification to Implementation
F.3.b	SIMQAP Updates	The County has not required an update to the SIMQAP to date.	No Change
F.3.c	SIMQAP Worker Notification	Applicable oil field staff receives training on the SIMQAP as a component of the annual CSD training program.	No Change
F.3.d	SIMQAP Inspections	The operator conducts annual internal safety audits of the facility which are tracked and scheduled by computer facility management software.	No Change
F.4	Annual Emergency Response Drills	Emergency response drills were conducted annually on November 24, 2009, November 3, 2010, October 26, 2011, November 7, 2012, and November 6, 2013. <i>Due to the fact that unannounced drills have not taken place in the past, it is recommended that efforts are made to ensure that unannounced drills take place at the oil field as required by the provision of the CSD. The Department of Regional Planning will coordinate with the Fire Department to ensure that unannounced drills occur in the future.</i>	Modification to Implementation
F.5	Noise Monitoring	The County has not required that the additional monitoring pursuant to this provision to be necessary to date.	No Change
F.6	Vibration Monitoring	The County has not required that the additional monitoring pursuant to this provision to be necessary to date.	No Change



## BALDWIN HILLS CSD PERIODIC REVIEW

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
F.7	Complaints	The complaint procedure required by this provision has been implemented and is ongoing	No Change
G.	Administrative Items		
G.1	Costs of Implementing Monitoring and Enforcing Conditions	The operator has made timely payments on all CSD monitoring and enforcement costs to the County through the draw down account required by CSD Provision G.2.	No Change
G.2	Draw Down Account	The draw down account has been maintained at or above the \$50,000 balance as required by this requirement since the adoption of the CSD.	No Change
G.3	Indemnification	The required agreement was documented in a letter signed by the operator and the County dated November 12, 2009, the agreement is on file with the County.	No Change
G.4	Insurance Requirements	The operator provided the County with an insurance policy meeting the requirements on January 18, 2010. The insurance was updated on June 25, 2013 to reflect the current operator of the oil field.	No Change
G.5	Performance Bond	The operator provided the County with a performance bond issued by an acceptable corporate surety licensed to transact business in the state of California on September 29, 2009. The insurance was updated on June 25, 2013 to reflect the current operator of the oil field.	No Change
G.6	Other Obligations	The condition is administrative in its intent and is considered to be fully implemented.	No Change
G.7	Periodic Review	This report, prepared subject to this provision, documents compliance with the periodic review requirement. The review provides a comprehensive analysis of the effectiveness of the requirements of each CSD provision.	No Change
G.8	MACC	The MACC held its first meeting on May 13, 2009. Subsequent meetings have been held on March 16, 2009, April 20, 2009, July 16, 2009, September 17, 2009, February 11, 2010, July 8, 2010, November 4, 2010, April 12, 2011, and May 13, 2013.	No Change
G.8.a	MACC Members	The MACC has had representation from the agencies listed in this provision as required.	No Change
G.8.b	MACC Chair	The MACC meeting Chair is selected by the committee as necessary.	No Change
G.8.c	MACC Meetings	The MACC meetings are scheduled by the committee as necessary.	No Change

## BALDWIN HILLS CSD PERIODIC REVIEW

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
G.8.d	Documents Provided to MACC	Documents required by the MACC are determined by the committee as necessary.	No Change
G.9	Related County Code Provisions	The condition is administrative in its intent and is considered to be fully implemented.	No Change
H.	Permitting		
H.1	Director's Review Required	The new well permits issued by the County have been less than the number allowed by the CSD and as by the CSD as revised by the Settlement Agreement and the Annual Well Increase Evaluation.	No Change
H.2	Conditional Use Permit Required	This provision is an administrative requirement for a land use permit process; the operator has not applied for such a permit to date.	No Change
H.3	CUP Requirements	This provision is an administrative requirement for a land use permit process; the operator has not applied for such a permit to date.	No Change
H.4	Application Where Violation Exists	This provision is administrative in its intent and has not been implemented to date. The condition requires the operator to resolve any land use violations prior to the application of any new permit application at the oil field.	No Change
I.	Enforcement		
I.1	Civil Penalties and Performance Security	No violations or enforcement actions have been taken by the County and there have been no issues regarding access to compliance documentation or for access to the oil field.	No Change
I.2	Access to Records and Facilities		
I.3	Right of Entry		
J.	Public Outreach		
J.1	CAP	Established in 2009 with first meeting held March 26, 2009 and the schedule for subsequent meetings determined during the meetings with meetings occurring approximately monthly.	No Change
J.1.a	CAP Members	CAP membership was determined pursuant to this subsection. <i>In response to requests by the public to update CAP membership, allow new members to fill vacant seats and replace absentee members, the DRP Director will review CAP membership and determine how to proceed under the existing provision of the CSD.</i>	Modification to Implementation

## BALDWIN HILLS CSD PERIODIC REVIEW

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
J.1.b	CAP Meetings	The CAP meetings schedule is determined during the meetings with meetings occurring approximately monthly.	No Change
J.1.c	Documents Provided to the CAP	Documentation is provided to the CAP by web site posting and hard copy distribution at CAP meetings.	No Change
J.2.a	Community Relations Community Meetings	Community meetings have occurred annually since the adoption of the CSD with the first meeting occurring on May 26, 2009. Subsequent meetings have taken place on April 21, 2010, June 8, 2011, October 15, 2012, and November 12, 2013. <i>Due to the public input on the 2013 Community Meeting, it is recommended that agendas for future Community Meetings be specific to oil field operations and issues and measures be implemented to ensure questions from the public are addressed appropriately.</i>	Modification to Implementation
J.2.b	Community Relations Newsletter	The newsletters have been prepared annually and are mailed out prior to the community meetings with noticing of the forthcoming meeting date, time, and location.	No Change
J.2.c	Community Relations Oil Field Web Site	The oil field web site, <a href="http://inglewoodoilfield.com">inglewoodoilfield.com</a> , was launched on January 19, 2010.	No Change
J.3	Ombudsperson	The ombudsperson system has been in place since the adoption of the CSD and serves as primary contact between the oil field operator and the community. Current ombudsperson is Lisa Paillet: <a href="mailto:lisa_paillet@fmi.com">lisa_paillet@fmi.com</a> , 1-800-766-4108.	No Change
K.	Modification Development Standards		
K.1	Modification Criteria	This subsection lists the requirements and permit processing procedures for a request for a modification to the development standards specified in subsection E of the CSD. No proposal or application for a modification of the development standards of CSD subsection E has been applied for to date.	No Change
K.2	Application		
K.3	Notice		
K.4	Application Approval/Denial Conditions		
K.5	Notification of Decision		
K.6	Appeal Procedures		

## BALDWIN HILLS CSD PERIODIC REVIEW

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
L.	Implementation Procedures		
L.1	Fire Protection and Emergency Response	This provision of the CSD lists the various implementation plans and other stipulations required for initial compliance for the categories identified in subsections L.1 through L.21. The table provided in the provision analysis section of this report provides the applicable plan or requirement for each subsection along with the completed compliance submittal date.	No Change
L.2	Air Quality and Public Health		Provision Completed
L.3	Safety and Risk of Upset		
L.4	Geotechnical		
L.5	Noise Attenuation		
L.6	Biological Resources		
L.7	Cultural/Historic Resources		
L.8	Landscaping, Visual Screening, and Irrigation		
L.9	Oil Field Waste Removal		
L.10	Signs		
L.11	Painting		
L.12	Water Management Plan		
L.13	Ground Water Monitoring		
L.14	Oil Field Cleanup and Maintenance		
L.15	Storage of Hazardous Materials		
L.16	Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan		
L.17	Processing Operations Pipelines		
L.18	Tanks		
L.19	Monitoring and Compliance		
L.20	Administrative Items		
L.21	Public Outreach		

## BALDWIN HILLS CSD PERIODIC REVIEW

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## SETTLEMENT AGREEMENT AND MUTUAL RELEASE

This Settlement Agreement and Mutual General Release (hereinafter "Agreement") is entered into as of July 15, 2011 by and between Community Health Councils, Inc., Natural Resources Defense Council, Mark Salkin, the City of Culver City ("City"), Citizens Coalition for a Safe Community and Concerned Citizens of South Central Los Angeles (hereinafter collectively "Petitioners"), the County of Los Angeles (hereinafter "County") and Plains Exploration & Production Company (hereinafter "PXP"). All parties may be referred to herein as Parties or Party.

### RECITALS

- A. This Agreement is entered into with respect to the following four consolidated cases (hereinafter collectively the "Consolidated Cases"), each of which was filed in the Superior Court of the State of California, County of Los Angeles:
- i. Lead case *Community Health Councils, Inc., Natural Resources Defense Council and Mark Salkin, petitioners, v. County of Los Angeles, respondents, and Plains Exploration and Production Company, et al., real parties in interest* (Case No. BS118018);
  - ii. *City of Culver City, petitioner and plaintiff, v. County of Los Angeles, Los Angeles County Board of Supervisors, respondents, and Plains Exploration and Production Company, et al., real parties in interest* (Case No. BS118023);
  - iii. *Concerned Citizens of South Central Los Angeles, petitioner, v. County of Los Angeles, respondents, and Plains Exploration and Production Company, et al., real parties in interest* (Case No. BS118039); and
  - iv. *Citizen's Coalition for a Safe Community, petitioner, v. County of Los Angeles, Board of Supervisors of the County of Los Angeles, respondents, and Plains Exploration and Production Company, et al., real parties in interest* (Case No. BS118056).
- B. On October 28, 2008, the County, by and through its Board of Supervisors (hereinafter "Board"), approved the Baldwin Hills Community Standards District ("CSD"), an amendment to its zoning code establishing development standards and operating procedures for oil and gas production operations for the unincorporated portion of the Inglewood oil field ("Oil Field") located in the Baldwin Hills Zoned District, which took effect on or about December 1, 2008 and remains in effect. The Board certified the Final Environmental Impact Report ("EIR") for the proposed CSD on October 21, 2008. PXP

had filed an application for establishment of the CSD pursuant to Title 22 of the Los Angeles County Code ("County Code").

- C. Petitioners filed the petitions for writs of mandate identified in paragraph A above under the California Environmental Quality Act ("CEQA") challenging, among other things, the adequacy of the EIR and the Board's approval of the CSD, naming the County or the County and the Board as Respondents and PXP as Real Party in Interest. Thereafter, certain property owners were named as Real Parties in Interest ("Landowners").
- D. The Parties desire to resolve certain matters, including any and all claims raised in the Consolidated Cases and/or arising out of, or related to, or connected with the matters referred to in paragraph B above, by way of compromise.
- E. This Agreement relates to all claims and disputes presented in the Consolidated Cases that may exist as of the date of this Agreement and any and all other claims and disputes that exist between, in any combination, the County, PXP, and Petitioners that concern or in any way relate to the Board's approval of the Baldwin Hills CSD and certifications of its EIR referred to in paragraph B above.

## TERMS OF SETTLEMENT

NOW, THEREFORE, in consideration of the facts recited above and the covenants, conditions, and promises contained herein, the Parties agree as follows:

1. *Slant Drilling.*
  - a. *Deep Zone Wells.* Pursuant to the CSD, PXP is required to develop and submit to the County an annual drilling, redrilling, well abandonment and well pad restoration plan (hereinafter "Annual Drilling Plan"). For any and each well that PXP proposes to drill where the Top Hole (as defined in paragraph 1.e below) is closer than 800 feet to a Sensitive Developed Area (as defined in paragraph 1.e below) and the Bottom Hole (as defined in Paragraph 1.e below) is located in any deep zone (presently identified as the Nodular Shale and Sentous zones and any other zones approximately 8,000 feet or deeper), as a supplement to its Annual Drilling Plan ("Deep Zone Supplement"), PXP will provide a study of the technical feasibility and commercial reasonability of Slant Drilling (as defined in paragraph 1.e below) each of the new deep zone wells in order to locate the Top Hole of any such well away from any Sensitive Developed Area in order to further mitigate potential impacts to such Areas. The Deep Zone Supplement will be reviewed by the County and County-retained expert or experts as part of the County's review of the Annual Drilling Plan. This study will provide a narrative to justify the proposed surface location and shall provide sufficient detail to allow the County to review the extent to which it may be technically feasible and commercially reasonable to locate the Top Hole away from Sensitive Developed Areas in order to further mitigate potential impacts to such Areas and still reach the targeted Bottom Hole location. PXP shall provide to the County any additional information as may be reasonably requested by the County or its expert which is necessary to complete its review. If such information is considered proprietary, the County and its expert will enter into a confidentiality agreement with PXP to protect such information. The narrative will be reviewed by the Director of Regional Planning prior to the approval of the Deep Zone Supplement. If approved by the Director, PXP will Slant Drill in order to locate the Top Hole away from Sensitive Developed Areas consistent with the narrative prepared by PXP that justifies the surface location.



- b. *Mid-Zone Wells.* For wells where the Top Hole is closer than 800 feet to a Sensitive Developed Area and the Bottom Hole is located in a mid-zone (approximately 3,500 to 7,999 feet deep, presently identified as the Rubel, Moynier, Bradna and City of Inglewood zones), PXP shall document such locations in a supplement to the Annual Drilling Plan ("Mid-Zone Supplement"). PXP shall use commercially reasonable efforts to locate new mid-zone wells and well pads away from Sensitive Developed Areas in order to further mitigate impacts to such Areas. The Mid-Zone Supplement shall explain why it is not technically feasible and commercially reasonable to locate the Top Hole away from Sensitive Developed Areas in order to further mitigate impacts to such Areas. The referenced mid-zone well pad assessment will be reviewed by County-retained experts and the County. PXP shall provide to the County any additional information as may be reasonably requested by the County or its expert which is necessary to complete its review. If such information is considered proprietary, the County and its expert will enter into a confidentiality agreement with PXP to protect such information. The County shall approve the mid-zone well locations as part of its review of the Mid-Zone Supplement if consistent with this paragraph.
- c. *Shallow Wells.* Drilling of wells where the Bottom Hole is less than approximately 3,500 feet deep (hereinafter "Shallow Wells") and above the zones identified in 1(b) as mid-zones, shall be located away from Developed Areas (as defined in the CSD) and shall be identified in the Annual Drilling Plan. Drilling of Shallow Wells may proceed pursuant to said drilling plan after the County approves the portion of the Annual Drilling Plan related to Shallow Wells as set forth in the CSD.
- d. *Supplement Review.* Upon receipt, the County shall promptly forward the Drilling Plan Supplements ("Supplements" defined to be a Deep Zone Supplement, a Mid-Zone Supplement, or both) filed by PXP to the Community Advisory Panel ("CAP") established pursuant to the CSD for its review and comment. The County will allow the CAP or CAP members two weeks from the date the County provided Supplements to the CAP to provide their written comments on the Supplement to the County. The County may review and approve the Annual Drilling Plan and related Supplements in phases consistent with the terms herein, but shall conduct its review of the Annual Drilling Plan and Mid-Zone Supplement within 45 calendar days after their submission to the County and either approve the Supplement or provide PXP with a list of deficiencies within that 45-day timeframe as set forth in the CSD. The Drilling Plan Supplements will only include the study referenced in 1(a) and other relevant or required information related to the location of proposed wells. The County

shall conduct its review of the Deep Zone Supplement within 45 calendar days after its submission and either approve the Supplement or provide PXP with a list of deficiencies within that 45-day timeframe after considering any timely CAP comments concerning the Deep Zone Supplement. The County will not delay its review of the Annual Drilling Plan or any supplements thereto. PXP may drill any wells approved under the Annual Drilling Plan regardless of the status of the County's review of the Supplements. Similarly, PXP may drill any wells approved under a Supplement regardless of the status of the Annual Drilling Plan review and approval. Changes to well pad locations that result from review of the Supplements will not require resubmittal of the Annual Plan or delay any drilling under the Annual Plan, beyond the time necessary to implement such changes.

- e. *Definitions.* "Top Hole" shall mean the surface location from which drilling is commenced. "Bottom Hole" shall mean the underground location at which drilling terminates. "Slant Drilling" shall mean non-vertical drilling, directional drilling, or drilling at a relatively significant angle. "Sensitive Developed Area" shall mean a lot or parcel that contains a single or multi-family residence, existing park, school or health care facility.
- f. *Environmental Consideration.* The County shall lessen or disapprove any otherwise required Slant Drilling if more remote drilling would result in more significant adverse environmental impacts on balance and the County shall consider any timely comments by the CAP assessing this balance.
- g. *Non-interference.* This paragraph 1 of the Agreement shall be construed in connection with the entire CSD. Except as expressly set forth above, this paragraph shall not be construed to interfere with PXP's business in the Oil Field.

2. *Noise.*

- a. The CSD currently provides that hourly, A-weighted equivalent noise levels associated with drilling, re-drilling and reworking wells shall not elevate baseline levels (which shall not include drilling, re-drilling or reworking operations) by more than five A-weighted decibels ("dBA") at the Oil Field boundary of any Developed Area. Instead of the referenced five dBA provision, PXP shall limit the night time (10 p.m. to 7 a.m.) noise levels at Developed Areas to no more than three dBA above a one-hour baseline average for the defined nighttime period, but at no time will PXP be required to maintain noise levels below the baseline nighttime noise levels. Furthermore, PXP and the County determined the baseline noise levels at four additional Oil Field boundary locations near Developed Areas,

selected by PXP and the County, in addition to the seven utilized in the EIR for a total of 11 locations. If PXP violates the above noise requirements, no new drilling or re-drilling permits shall be issued by the County until PXP, in

consultation with the County, identifies the source of the noise and PXP takes steps necessary to assure compliance with the above-specified threshold.

- b. If drilling, re-drilling or reworking operations elevate nighttime baseline noise levels by more than 10dBA for more than 15 minutes in any one hour as independently verified and determined by the County, PXP, in consultation with the County, shall identify the cause and source of the noise and take steps to avoid such extended periods of noise elevation in the future. This provision does not negate the CSD noise limits between 7 a.m. to 10 p.m.
3. *Number of Drill Rigs.* Notwithstanding the CSD's allowance for operation of a maximum of three drill rigs at any one time on the Oil Field, PXP shall limit to two the number of drill rigs in use at any one time.
  4. *Number of wells.* Notwithstanding the aggregate and annual well-drilling limits in the CSD, PXP shall comply with the following limits:
    - a. Notwithstanding Section 22.44.142.H of the CSD, no more than 500 new wells (inclusive of Bonus Wells and wells drilled since approval of CSD) shall be drilled pursuant to the CSD (hereinafter "Director's Review") through October 1, 2028, or during the remaining life of the CSD, whichever is later.
    - b. Until such time as PXP has drilled or re-drilled 50 wells since the adoption of the CSD, or 24 months from the date of this Agreement, whichever is sooner ("Time Period One"), no more than 30 wells may be drilled or re-drilled in any calendar year pursuant to a Director's Review as set forth in the CSD (hereinafter Director's Review). At the end of Time Period One, and if the County determines, pursuant to its review of the CSD by the Director of Regional Planning, that the CSD has been effective in protecting the health, safety, and general welfare of the public, thereafter (the "Full Operational Period") no more than 35 wells may be drilled or re-drilled in the calendar year pursuant to Director's Review.
    - c. In Time Period One, for each well abandoned within 800 feet of any Developed Area (the "800-foot zone") by PXP since adoption of the CSD and in full compliance with the California Department of Conservation's Division of Oil, Gas

and Geothermal Resources ("DOGGR") standards for abandonment at the time of abandonment, PXP may drill two additional new wells outside of the 800-foot zone (hereinafter "Bonus Wells"), up to a maximum of 45 drilled and re-drilled wells (30 wells plus 15 Bonus Wells) in any calendar year within Time Period One pursuant to Director's Review and subject to review and approval in the Annual Drilling Plan. Subject to the annual and aggregate limits on number of wells, Bonus Wells earned by abandonment may be drilled at any time during the life of the CSD.

- d. In the Full Operational Period, for each well abandoned within the 800-foot zone, PXP may drill two additional new wells outside the 800-foot zone up to a maximum of 53 drilled and re-drilled wells (35 wells plus 18 Bonus Wells) in that year pursuant to Director's Review and subject to review and approval in the Annual Drilling Plan. Subject to the aggregate and annual limits on number of wells, Bonus Wells earned by abandonment may be drilled at any time during the life of the CSD.
- e. The Developed Area as used in the CSD with respect to the 400-foot buffer zone (Section 22.44.142.E.) shall remain unchanged (static or fixed) from what it was determined to be on the effective date of the CSD.

- 5. *Health Assessment and Environmental Justice Study.* The County shall complete a Community Health Assessment of the communities surrounding the Oil Field which shall include an Environmental Justice component by June 2012 and ensure additional assessments are completed every five to seven years throughout the life of the CSD. In future Community Health Assessments, the County Department of Public Health ("Public Health") shall review other agencies' reports regarding air quality, water quality and seismic data, where feasible, in its assessment. Public Health will analyze the information by socio-economic and demographic data to accommodate and reflect an Environmental Justice component. The Community Health Assessment shall include, but not be limited to, an analysis of cancer rates, mortality rates, birth outcomes and a survey of other pertinent health indicators. The County will consult with the CAP and the Health Working Group regarding the Community Health Assessment and consider reasonable comments by the CAP and the Health Working Group. Public Health will comply with all applicable state and federal requirements including Title VI of the Civil Rights Act of 1964 and corresponding regulations, and California Government Code Section 11135 and corresponding regulations.
- 6. *Clean Technology Assessment.* The CSD requires PXP to consider proven reasonable and feasible technological improvements which are capable of reducing the

environmental impacts of drilling and re-drilling. (County Code section 22.44.142.E.26.f) The CSD also requires that the Annual Drilling Plan include a discussion of the latest equipment and techniques that are proposed for use as part of its drilling and re-drilling program to reduce environmental impacts. (County Code section 22.44.142.E.26.c.ix) Pursuant thereto, PXP shall address in each Annual Drilling Plan the availability and feasibility of the use of natural gas-powered drill rigs or other technology capable of reducing environmental impacts, for the drilling of wells proposed in the Annual Drilling Plan (collectively "Clean Technology"). During the Periodic Review provided in 22.44.142 G.7, the County will evaluate such technology for brand new equipment that PXP intends to lease, acquire or otherwise use and require PXP to implement such technology to the extent the technology is feasible and available on a commercially reasonable basis.

7. *Electrical Distribution Study.* The County will propose to Southern California Edison ("SCE") and the Los Angeles Department of Water and Power ("DWP") that a study be conducted in cooperation with SCE, DWP, the County and PXP regarding opportunities to streamline and consolidate electrical lines distributed throughout the Oil Field and that SCE and DWP each fund one-fourth of the cost of such study. PXP will fund one-fourth of the cost of any such study. The County will fund one-fourth of the cost of any such study.
8. *Air Quality Monitoring.* Supplemental to the air monitoring required by the CSD, the County will develop and implement an air quality monitoring plan that takes into consideration review and comments from Petitioners, interested stakeholders and the public. Such air monitoring shall be designed to assess the risk of both acute and chronic exposure to air contaminants from Oil Field operations, and endeavor to determine and distinguish the source of emissions, to the extent feasible, using available and affordable monitoring technology. Such air monitoring may be performed by SCAQMD, or an independent qualified consultant selected by County, and shall be commenced within 12 months of the date of this Agreement. The protocol for the air monitoring plan shall be peer reviewed prior to commencement. The plan shall be completed, and a peer reviewed report issued, within 12 to 24 months after commencement. The County commits to spending up to \$250,000 of its own funds toward implementing the plan and shall use reasonable efforts to seek additional funding sources, if necessary, to implement the plan. PXP shall reasonably cooperate with SCAQMD, the County and/or the independent consultant regarding any and all air monitoring related to the Oil Field.
9. *Back-Up Flare.* The CSD (County Code section 22.44.142.L.5.b) allows PXP to maintain its existing gas plant flare as back-up equipment at the facility's gas plant after

a new flare is permitted and installed. PXP and the County agree that this provision of the CSD allows only one gas plant flare to be operated at one time at the Oil Field. PXP shall comply with said limitation of only one gas plant flare operating at one time at the Oil Field. PXP shall install and have operational the new flare within 180 days of receiving the SCAQMD permit or at such later date as approved by the Director of Regional Planning for good cause shown.

10. *Well Plugs.* DOGGR requires oil field operators to utilize a minimum 25-foot cement surface plug at the top of a well when abandoning any such well pursuant to Title 14 of the California Code of Regulations section 1723.5. To augment this requirement, for all wells abandoned at the Oil Field from the date of this Agreement, PXP shall utilize a total of 150-foot cement surface plug.
11. *Landscaping.* PXP agrees to prepare and implement a series of landscape plans ("Landscape Plans") that enhance the Mia Lehrer Landscape Improvements Concepts plan dated November 4, 2008 to include, but not be limited to, landscaping along or near the border of the Oil Field in consultation with the County and subject to the County's approval. PXP's Landscape Plans shall be forwarded to the CAP for review. PXP will use best efforts to complete installation of the first two phases of the Landscape Plans along La Brea, between Stocker and Slauson, and Ladera Crest, within nine (9) months of County's final approvals of each of those first two Landscaping Plans using best landscaping practices. PXP agrees that it will complete the entire landscaping required by the County-approved Landscape Plans within three years after approval by the County of the final phase.
12. *Clean-Up Plan.* The CSD requires PXP to decommission and remove facilities that have reached the end of their useful economic life (County Code section 22.44.142.E.21.a) and submit to the County for its approval an unused or abandoned equipment removal plan (County Code section 22.44.142.L.14). PXP has submitted such a plan in 2009 and shall periodically update the plan should additional equipment, not identified in PXP's original removal plan, become unused or abandoned. Equipment and materials not necessary to oil field operations as identified by the Director of Planning shall be promptly removed from view of Sensitive Developed Areas as addressed in the plan.
13. *Fracking Study.* PXP shall pay for an independent consultant to conduct a study of the feasibility and potential impacts (including impacts to groundwater and subsidence) of the types of fracturing operations PXP may conduct in the Oil Field. The study will also consider PXP's historic and current use of gravel packing. Such study will be completed within twelve (12) months of the date of this Agreement. Such study and all

the back-up information for such study shall be provided to a qualified peer reviewer selected by the County and PXP, who shall review the study, back-up materials, and conclusions for completeness and accuracy. PXP must provide the independent expert with all materials requested and reasonably necessary for an accurate and verifiable study. The peer reviewer will be provided with access to all the data and materials provided to the independent expert. The peer reviewer shall agree to keep all proprietary information confidential. If the peer reviewer determines that the study is materially inadequate, incomplete or inaccurate, it shall so advise PXP's consultant who will complete the study as reasonably recommended by the peer reviewer and provide the revised study to the peer reviewer within 90 days. Upon acceptance by the peer reviewer, the study and all supporting material, including comments by the peer reviewer, shall be forwarded to the County, DOGGR, the Regional Water Quality Control Board ("RWQCB"), CAP and Petitioners and be available to the public, with any proprietary information redacted.

14. *CSD Review Based On Reduced Production.* When production drops to three percent of the estimated peak production to date of 21,000 barrels of oil per day, the County will review the CSD to consider whether modifications or closure of the Oil Field is necessary or appropriate or at such earlier date as the County determines is appropriate.
15. *CSD Provisions.* The CSD and all of its standards and requirements remain in full force and effect except to the extent that PXP has agreed to be limited by stricter or more rigorous controls or standards as reflected in this Agreement. Nothing herein shall limit or abrogate the County's discretion in amending the CSD, or other action pursuant to the County's legislative or police powers, to impose more restrictive requirements. This Agreement neither establishes nor abrogates any vested rights to drill new wells in the Oil Field. The County will provide written guidance on the additional limits and controls regarding operation of the Oil Field which are required by this Agreement to County staff and departments responsible for implementing the CSD and enforcing the CSD, and any other personnel the County deems necessary. The County shall recirculate this written guidance on an annual basis.
16. *General Releases between Petitioners and County.* In consideration of the terms and provisions of this Agreement, the County and Petitioners on behalf of themselves and their respective predecessors, successors, heirs, assigns, owners, attorneys, affiliates, parent corporation(s), divisions, officers, directors, employees, agents, representatives, partners, servants, executors, administrators, shareholders, board, councils, commissions, department, members, and each of them, in any and all capacities, do hereby mutually relieve, release and forever discharge the others and their respective predecessors, successors, heirs, assigns, owners, attorneys, affiliates, parent

corporation(s), divisions, officers, directors, employees, agents, representatives, partners, servants, executors, administrators, shareholders, board, councils, commissions, departments, members, and each of them, in any and all capacities, of and from all claims, rights, debts, liabilities, demand, obligations, liens, promises, acts, agreements, costs and expenses (including, but not limited to, attorneys' fees, costs and interest), damages, actions and cause of action, of whatever kind or nature (including without limitation, any statutory, civil or administrative claim, or any claim, arising out of acts or omissions occurring before the execution of this agreement), whether now known or unknown, suspected or unsuspected, fixed or contingent, apparent or concealed, relating to the Board's certification of the EIR and approval of the CSD; PROVIDED, HOWEVER, that this mutual release is not intended to and shall not constitute a release of the Parties' rights, obligations or warranties under this Agreement nor the rights and obligations of the County under the provisions of, or as set forth in, the CSD subject to the terms of paragraph 15. This release shall become final and take effect as to all Parties at the time upon which dismissals are to be filed pursuant to paragraph 28. Nothing herein shall release any claim for personal injury property damage or other claims, including any claim for nuisance, arising out of or related to acts or omissions in the operation of the Oil Field. Nothing herein shall release any claim or limit any right to challenge any future approval or action by the County, or other agency, relating to the CSD or the Oil Field.

17. *General Releases between Petitioners and PXP.* In consideration of the terms and provisions of this Agreement, PXP and Petitioners on behalf of themselves and their respective predecessors, successors, heirs, assigns, owners, attorneys, affiliates, parent corporation(s), divisions, officers, directors, employees, agents, representatives, partners, servants, executors, administrators, shareholders, board, councils, commissions, department, members, and each of them, in any and all capacities, do hereby mutually relieve, release and forever discharge the others and their respective predecessors, successors, heirs, assigns, owners, attorneys, affiliates, parent corporation(s), divisions, officers, directors, employees, agents, representatives, partners, servants, executors, administrators, shareholders, board, councils, commissions, departments, members, and each of them, in any and all capacities, of and from all claims, rights, debts, liabilities, demand, obligations, liens, promises, acts, agreements, costs and expenses (including, but not limited to, attorneys' fees, costs and interest), damages, actions and cause of action, of whatever kind or nature (including without limitation, any statutory, civil or administrative claim, or any claim, arising out of acts or omissions occurring before the execution of this agreement), whether now known or unknown, suspected or unsuspected, fixed or contingent, apparent or concealed, relating to the Board's certification of the EIR and approval of the CSD; PROVIDED, HOWEVER, that this mutual release is not intended to and shall not



constitute a release of the Parties' rights, obligations or warranties under this Agreement nor the rights and obligations of PXP under the provisions of, or as set forth in, the CSD subject to the terms of paragraph 15. Notwithstanding anything herein to the contrary, no person or entity that has or acquires an interest in the Oil Field, but contends or is adjudicated to not be bound by this Agreement, notwithstanding the intent of the Parties that such persons or entities are so bound, shall not be entitled to the benefits of the releases herein. This release shall become final and take effect as to all Parties at the time upon which dismissals are to be filed pursuant to paragraph 28. Nothing herein shall release any claim for personal injury, property damage or other claims, including any claim for nuisance, arising out of or related to acts or omissions in the operation of the Oil Field. Nothing herein shall release any claim or limit any right to challenge any future approval or action by the County, or other agency, relating to the CSD or the Oil Field. Nothing in this Agreement shall affect the City's rights, police powers or authority to regulate that portion of the Inglewood oil field within Culver City, nor shall this Agreement affect PXP's rights and operations, of that portion of the Inglewood oil field within Culver City.

18. *Settlement of Claims for Attorneys' Fees and Costs.* In settlement of each of Petitioners' claims for attorneys fees and costs, PXP shall pay \$1,250,000 and County shall pay \$350,000 ("Payments"). Before the time provided in Paragraph 28 below for dismissal of the Consolidated Cases expires, Petitioners may elect to provide written notice to PXP and County that it intends to dismiss the Consolidated Cases and, if so, shall provide counsel for PXP executed requests for dismissal of the Consolidated Cases ("Requests"). PXP and County will make their respective Payments to the Greenberg Glusker Fields Claman and Machtinger LLP Client Trust Account by check or wire transfer (with instructions to be provided) within twenty (20) days after receipt of the notice and Requests unless that would result in payment sooner than 45 days after the County Board of Supervisors approves the settlement, in which case Payment will be delivered no later than the 45<sup>th</sup> day after Board approval. If the above-referenced notice is not provided, the Payments will be made at the expiration of the time provided in Paragraph 28 below with PXP and the County making their respective Payments to the Greenberg Glusker Fields Claman and Machtinger LLP Client Trust Account by check or wire transfer (with instructions to be provided) after the Requests have been delivered to counsel for PXP. In either case, counsel for PXP shall hold the Requests in trust until the Payments by PXP and County have been delivered to Greenberg Glusker Fields Claman and Machtinger and shall thereafter file the Requests with the Court.
19. *Parties Bound.* This Agreement shall inure to the benefit of and shall be binding upon the successors and assigns of the Parties to this Agreement, including any successors to

any rights of PXP to operate in the Oil Field, and each of them. This Agreement may be enforced by any Party to the Agreement.

20. *Integration.* The Agreement constitutes a single, integrated written contract expressing the entire agreement of the Parties relative to the subject matter hereof and, with the sole and exclusive exception of any contemporaneous or subsequent written agreement between the Parties hereto subscribed by them or their duly authorized officers or agents, all prior and contemporaneous discussions and negotiations have been and are merged and integrated into, and are superseded by, this Agreement. Thus, no covenants, agreements, representations, or warranties of any kind whatsoever, whether express or implied in law or fact, have been made by any Party, except as specifically set forth in this Agreement or any contemporaneous or subsequent written agreement between the Parties subscribed by them or their duly authorized officers or agents.
21. *Non-Assignment of Claims.* Each of the Parties represents and warrants that it has not assigned or transferred any portions of any claim or interest arising out of, related to, or connected with the matters referred to in paragraphs A, B and C of the Recitals in this Agreement to any other individual, firm, corporation or other entity and that no such individual, firm, corporation or other entity has any lien, claim or interest in any of such claims. Each Party shall indemnify each other Party, defend, and hold it harmless from and against any claims, rights, debts, liabilities, demands, obligations, liens, promises, acts, agreements, costs and expenses (including, without limitation, attorneys' fees and costs), damages, actions and causes of action, of whatever kind or nature (including, without limitation, any statutory, civil or administrative claim, or any claim, arising out of acts or omissions occurring before the execution of this Agreement) of whatever kind or nature, whether now known or unknown, suspected or unsuspected, fixed or contingent, apparent or concealed, arising out of, related to or connected with any such prior assignment or transfer, or any such purported assignment or transfer.
22. *Settlement of Disputed Claims.* The Parties explicitly acknowledge and covenant that this Agreement represents a settlement of disputed rights and claims and that, by entering into this Agreement, no Party hereto admits or acknowledges the existence of any liability or wrongdoing, all such liability being expressly denied. No provisions hereof, or of any related documents, shall be construed as any admission or concession of liability, or any wrongdoing or of any preexisting liability.
23. *Additional terms.* Each of the Parties represents, warrants and agrees as follows:
  - a. Each of the Parties has received prior independent legal advice from legal counsel of its choice with respect to the advisability of making the settlement provided for

herein and with respect to the advisability of executing this Agreement. Each Party's attorney has reviewed the Agreement at length, made any desired changes, and signed the Agreement to indicate the attorney approved the Agreement as to form.

- b. Except for statements expressly set forth in this Agreement, no Party has made any statement or representation to any other Party regarding a fact relied upon by the other Party in entering into this Agreement and no Party has relied upon any statement, representation, or promise of any other Party, or of any representative or attorney for any other Party, in executing this Agreement or in making the settlement provided for herein.
- c. Each of the Parties has read the Agreement carefully, knows and understands the contents thereof, and has made such investigation of the facts pertaining to the settlement and this Agreement and of all matters pertaining hereto as it deems necessary and desirable.
- d. The terms of the Agreement are contractual, not a mere recital, and are the result of negotiations between the Parties.
- e. Each of the Parties to the Agreement agrees that such Party will not take any action which would interfere with the performance of this Agreement by any of the other Parties or which would adversely affect the rights provided for herein.
- f. This Agreement is intended to be final and binding between the Parties and further intended to be effective as a full and final accord and satisfaction between them as to any issue or claim arising out of, related to, or connected with the matters referred to in paragraphs A, B and C of the Recitals in this Agreement. Each Party relies on the finality of this Agreement as a material factor inducing that Party's execution of this Agreement.
- g. The failure by any Party to insist on performance of any of the terms or conditions of this Agreement shall not void any of the terms or conditions hereto, or constitute a waiver or modification of any of the terms or conditions hereto, nor be construed as a waiver or relinquishment by such Party of the performance of any such terms or conditions.

24. *Modifications.* No modification, amendment or waiver of any of the provisions contained in this Agreement, or any future representation, promise or condition in connection with the subject matter of this Agreement, shall be binding upon any Party

unless made in writing and signed by such Party or by a duly authorized officer or agent of Party, and except, that the County, as required by law, retains the right to amend the CSD, so long as done pursuant to the requirements of law.

25. *Execution.* This Agreement may be executed and delivered in any number of counterparts or copies ("Counterparts") by the Parties. Signatures may be provided via telefacsimile or electronically in PDF format. When each Party has signed and delivered at least one counterpart to the other Parties, each counterpart shall be deemed an original and, taken together, shall constitute one and the same Agreement, which shall be binding and effective as to the Parties.
26. *Authority to Execute.* Each Party executing this Agreement further represents and warrants that each has the full right and authority to enter into and perform this Agreement on behalf of the Party for whom each has signed and the full right and authority to bind fully said party to the terms and obligations (including, without limitation, the representations and warranties set forth herein) of this Agreement. The execution and delivery of this Agreement and the performance of the Parties' obligations have been or will be duly authorized by all necessary actions on the part of each of the Parties. This Agreement constitutes the legal, valid and binding obligations on, and of, the Parties.
27. *Covenant Not to Sue.* Each Party covenants not to assert any claim, right or defense that the Agreement is illegal, invalid, void or unenforceable and irrevocably waives any such claim, right or defense.
28. *Dismissal of Consolidated Cases.* Unless Petitioners elect to dismiss the Consolidated Cases sooner in accordance with Paragraph 18 above, within 180 days after execution of this Agreement by all Parties, Petitioners, and each of them, shall cause to be delivered to counsel for PXP the Requests; provided, however, that if a petition or other challenge to this Agreement has been timely filed, or is alleged to be, such Requests shall be delivered to counsel for PXP only if the petition or other challenge is unsuccessful and all avenues of appeal have been exhausted or the time has run to do so. PXP shall file the Requests after the Payments have been delivered as provided in Paragraph 18 above. After such time, the Parties shall take any other steps necessary to dismiss the Consolidated Cases. The Parties, through their counsel of record, shall sign the Stipulation and Proposed Order attached hereto as Exhibit B to be filed with the Court upon execution of this Agreement.
29. *Public Notice.* Following the execution of this Agreement, the Parties shall make an individual and/or joint public statement that shall include each of the elements of

Exhibit A. On an annual basis, the County shall schedule a public discussion at the CAP concerning this Agreement and the status of compliance with its terms. Additionally, the County shall post a copy of this Agreement on the County's Baldwin Hills Community Standards District webpage.

30. *Remedies for Breach.* The County will monitor and enforce PXP's compliance with the terms of the Agreement in the same manner and to the same extent as the County monitors and enforces the terms of the CSD.
  - a. The County shall not approve any Annual Drilling Plan nor any application for any new permits on the Oil Field, including any permit to drill or redrill any wells, if PXP is in violation of any of the material terms of paragraphs 1 – 4 and 11.
  - b. The terms of this Agreement may be enforced by bringing a breach of contract claim, or any other appropriate claim, in a court of competent jurisdiction.
  - c. Nothing herein shall be construed to limit any Parties' claims for damages or other relief, arising out of the breach of the terms of paragraphs 1 through 12 of this Agreement.
31. *Governing Law.* This Agreement shall be construed and enforced in accordance with the laws of the State of California where it is deemed to have been executed and delivered.
32. *Captions and Headings.* Captions and paragraph headings used herein are for convenience only. They are not a part of this Agreement and shall not be used in construing it.
33. *Survival.* Each and all of the covenants, representations and warranties of the Parties set forth in this Agreement shall survive the execution and delivery of this Agreement and the execution and delivery of any other document provided for herein.
34. *Good Faith Provision.* The Parties agree to cooperate fully, reasonably, and in good faith in the implementation of this Agreement. The Parties also agree to execute any and all supplemental documents, and to take all additional lawful and reasonable actions which may be necessary or appropriate to give full force and effect to the basic terms and to fully implement the goals and intent of this Agreement.

IN WITNESS WHEREOF, the Parties and their respective attorneys of record have approved and executed this Agreement on the dates specified below:

**RESPONDENTS**

**COUNTY OF LOS ANGELES,  
CALIFORNIA**

Date: July 14, 2011

By: Elaine M. Lemke (for)  
ELAINE M. LEMKE,  
Principal Deputy County Counsel  
Property Division

**PETITIONERS**

**MARK SALKIN**

Date: \_\_\_\_\_, 2011

\_\_\_\_\_  
MARK SALKIN, as an individual

**COMMUNITY HEALTH COUNCILS, INC.**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**NATURAL RESOURCES DEFENSE  
COUNCIL**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

[SIGNATURES CONTINUED ON NEXT PAGE]

IN WITNESS WHEREOF, the Parties and their respective attorneys of record have approved and executed this Agreement on the dates specified below:

**RESPONDENTS**

**COUNTY OF LOS ANGELES,  
CALIFORNIA**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

ELAINE M. LEMKE,  
Principal Deputy County Counsel  
Property Division

**PETITIONERS**

**MARK SALKIN**

Date: July 14, 2011

  
\_\_\_\_\_  
MARK SALKIN, as an individual

**COMMUNITY HEALTH COUNCILS, INC.**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**NATURAL RESOURCES DEFENSE  
COUNCIL**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

[SIGNATURES CONTINUED ON NEXT PAGE]

IN WITNESS WHEREOF, the Parties and their respective attorneys of record have approved and executed this Agreement on the dates specified below:

**RESPONDENTS**

**COUNTY OF LOS ANGELES,  
CALIFORNIA**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
ELAINE M. LEMKE,  
Principal Deputy County Counsel  
Property Division

**PETITIONERS**


**MARK SALKIN**

Date: \_\_\_\_\_, 2011

\_\_\_\_\_  
MARK SALKIN, as an individual

**COMMUNITY HEALTH COUNCILS, INC.**

Date: 7/13/2011, 2011

By:  \_\_\_\_\_

**NATURAL RESOURCES DEFENSE  
COUNCIL**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

[SIGNATURES CONTINUED ON NEXT PAGE]



IN WITNESS WHEREOF, the Parties and their respective attorneys of record have approved and executed this Agreement on the dates specified below:

**RESPONDENTS**

**COUNTY OF LOS ANGELES,  
CALIFORNIA**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
**ELAINE M. LEMKE,**  
Principal Deputy County Counsel  
Property Division

**PETITIONERS**

**MARK SALKIN**

Date: \_\_\_\_\_, 2011

\_\_\_\_\_  
MARK SALKIN, as an individual

**COMMUNITY HEALTH COUNCILS, INC.**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**NATURAL RESOURCES DEFENSE  
COUNCIL**

Date: July 11, 2011

By: Janice K. Nayani

[SIGNATURES CONTINUED ON NEXT PAGE]

Date: \_\_\_\_\_, 2011

**CITY OF CULVER CITY**

By: Michael O'Leary  
MICHEÁL O'LEARY, Mayor

**CONCERNED CITIZENS OF SOUTH  
CENTRAL LOS ANGELES**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**CITIZEN'S COALITION FOR A SAFE  
COMMUNITY**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**REAL PARTY IN INTEREST**

**PLAINS EXPLORATION & PRODUCTION  
COMPANY**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**APPROVED AS TO FORM**

**COUNTY OF LOS ANGELES OFFICE OF  
THE COUNTY COUNSEL**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
ELAINE M. LEMKE  
Attorneys for Respondents COUNTY OF  
LOS ANGELES AND LOS ANGELES  
COUNTY BOARD OF SUPERVISORS

[SIGNATURES CONTINUED ON NEXT PAGE]

**CITY OF CULVER CITY**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**CONCERNED CITIZENS OF SOUTH  
CENTRAL LOS ANGELES**

Date: 7/12, 2011

By: [Signature]

**CITIZEN'S COALITION FOR A SAFE  
COMMUNITY**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**REAL PARTY IN INTEREST**

**PLAINS EXPLORATION & PRODUCTION  
COMPANY**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**APPROVED AS TO FORM**

**COUNTY OF LOS ANGELES OFFICE OF  
THE COUNTY COUNSEL**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

ELAINE M. LEMKE  
Attorneys for Respondents COUNTY OF  
LOS ANGELES AND LOS ANGELES  
COUNTY BOARD OF SUPERVISORS

[SIGNATURES CONTINUED ON NEXT PAGE]

Date: \_\_\_\_\_, 2011

**CITY OF CULVER CITY**

By: \_\_\_\_\_

**CONCERNED CITIZENS OF SOUTH  
CENTRAL LOS ANGELES**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**CITIZEN'S COALITION FOR A SAFE  
COMMUNITY**

Date: July 12, 2011

By: Mered J. Glass

**REAL PARTY IN INTEREST**

**PLAINS EXPLORATION & PRODUCTION  
COMPANY**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**APPROVED AS TO FORM**

**COUNTY OF LOS ANGELES OFFICE OF  
THE COUNTY COUNSEL**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**ELAINE M. LEMKE**

**Attorneys for Respondents COUNTY OF  
LOS ANGELES AND LOS ANGELES  
COUNTY BOARD OF SUPERVISORS**

[SIGNATURES CONTINUED ON NEXT PAGE]

**CITY OF CULVER CITY**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**CONCERNED CITIZENS OF SOUTH  
CENTRAL LOS ANGELES**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**CITIZEN'S COALITION FOR A SAFE  
COMMUNITY**


Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**REAL PARTY IN INTEREST**

**PLAINS EXPLORATION & PRODUCTION  
COMPANY**

Date: \_\_\_\_\_, 2011

By:   
DOSS R. BOURGEOIS, EXEC. VP E&P

**APPROVED AS TO FORM**

**COUNTY OF LOS ANGELES OFFICE OF  
THE COUNTY COUNSEL**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
ELAINE M. LEMKE  
Attorneys for Respondents COUNTY OF  
LOS ANGELES AND LOS ANGELES  
COUNTY BOARD OF SUPERVISORS

[SIGNATURES CONTINUED ON NEXT PAGE]

**CITY OF CULVER CITY**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**CONCERNED CITIZENS OF SOUTH  
CENTRAL LOS ANGELES**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**CITIZEN'S COALITION FOR A SAFE  
COMMUNITY**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**REAL PARTY IN INTEREST**

**PLAINS EXPLORATION & PRODUCTION  
COMPANY**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_

**APPROVED AS TO FORM**

**COUNTY OF LOS ANGELES OFFICE OF  
THE COUNTY COUNSEL**

Date: July 11, 2011


By: ELM for

ELAINE M. LEMKE  
Attorneys for Respondents COUNTY OF  
LOS ANGELES AND LOS ANGELES  
COUNTY BOARD OF SUPERVISORS

[SIGNATURES CONTINUED ON NEXT PAGE]

**HARDING LARMORE KUTCHER &  
KOZAL LLP**

Date: July 14, 2011

By:   
KENNETH L. KUTCHER  
Attorneys for Petitioners COMMUNITY  
HEALTH COUNCILS; NATURAL  
RESOURCES DEFENSE COUNCIL &  
MARK SALKIN

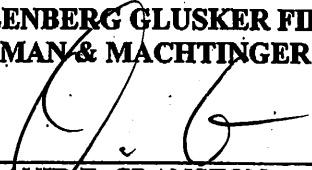
**NATURAL RESOURCES DEFENSE  
COUNCIL**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
DAMON NAGAMI  
Attorneys for Petitioners COMMUNITY  
HEALTH COUNCILS; NATURAL  
RESOURCES DEFENSE COUNCIL &  
MARK SALKIN

**GREENBERG GLUSKER FIELDS  
CLAMAN & MACHTINGER LLP**

Date: July 14, 2011

By:   
DAVID E. CRANSTON  
Attorney for Petitioner CITY OF CULVER  
CITY

[SIGNATURES CONTINUED ON NEXT PAGE]

**HARDING LARMORE KUTCHER &  
KOZAL LLP**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
**KENNETH L. KUTCHER**  
Attorneys for Petitioners **COMMUNITY  
HEALTH COUNCILS; NATURAL  
RESOURCES DEFENSE COUNCIL &  
MARK SALKIN**

**NATURAL RESOURCES DEFENSE  
COUNCIL**

Date: July 11, 2011

By: Damon K. Nagami  
**DAMON NAGAMI**  
Attorneys for Petitioners **COMMUNITY  
HEALTH COUNCILS; NATURAL  
RESOURCES DEFENSE COUNCIL &  
MARK SALKIN**

**GREENBERG GLUSKER FIELDS  
CLAMAN & MACHTINGER LLP**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
**DAVID E. CRANSTON**  
Attorney for Petitioner **CITY OF CULVER  
CITY**

[SIGNATURES CONTINUED ON NEXT PAGE]



Date: July 2, 2011

**THE CITY PROJECT**  
A 501(c)(3) Public Benefit Corporation

By: Robert Garcia  
ROBERT GARCIA  
Attorneys for Petitioners CONCERNED  
CITIZENS OF SOUTH CENTRAL LOS  
ANGELES

**LAW OFFICES OF TODD T. CARDIFF**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
TODD T. CARDIFF  
Attorneys for Petitioners CITIZENS  
COALITIONS FOR A SAFE  
COMMUNITY

**GIBSON DUNN & CRUTCHER LLP**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
JEFFREY D. DINTZER  
Attorneys for Real Parties in Interest  
PLAINS EXPLORATION AND  
PRODUCTION COMPANY

**THE CITY PROJECT**  
A 501(c)(3) Public Benefit Corporation

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
ROBERT GARCIA  
Attorneys for Petitioners CONCERNED  
CITIZENS OF SOUTH CENTRAL LOS  
ANGELES

**LAW OFFICES OF TODD T. CARDIFF**

Date: July 13, 2011

By: Todd T. Cardiff  
TODD T. CARDIFF  
Attorneys for Petitioners CITIZENS  
COALITIONS FOR A SAFE  
COMMUNITY

**GIBSON DUNN & CRUTCHER LLP**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
JEFFREY D. DINTZER  
Attorneys for Real Parties in Interest  
PLAINS EXPLORATION AND  
PRODUCTION COMPANY

**THE CITY PROJECT**  
A 501(c)(3) Public Benefit Corporation

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
ROBERT GARCIA  
Attorneys for Petitioners CONCERNED  
CITIZENS OF SOUTH CENTRAL LOS  
ANGELES

**LAW OFFICES OF TODD T. CARDIFF**

Date: \_\_\_\_\_, 2011

By: \_\_\_\_\_  
TODD T. CARDIFF  
Attorneys for Petitioners CITIZENS  
COALITIONS FOR A SAFE  
COMMUNITY

**GIBSON DUNN & CRUTCHER LLP**

Date: July 14, 2011

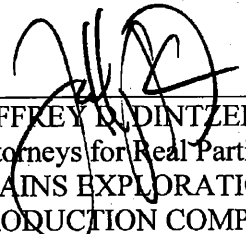
By: \_\_\_\_\_  
  
JEFFREY M. DINTLER  
Attorneys for Real Parties in Interest  
PLAINS EXPLORATION AND  
PRODUCTION COMPANY

EXHIBIT A - Public Statement - Paragraph 29 (Public Notice)

- i. The parties have negotiated in good faith a settlement containing important improvements to the Baldwin Hills Community Standards District ("CSD") that could not have been compelled by a court order resulting from the current litigation challenging the County's Environmental Impact Report and the CSD.
- ii. The terms of the settlement adequately augment the protections contained in the CSD and, when combined with the existing provisions of the CSD, provide a satisfactory framework for safeguarding community health, safety and security.
- iii. The settlement expedites the resolution of significant community concerns and allows the focus of this process to shift to constructive dialogue, implementation, monitoring and establishment of a more effective working relationship between the parties.

**EXHIBIT B**

1 CAROL A. SCHWAB (SBN 120183)  
City Attorney  
2 HEATHER S. BAKER (SBN 193058)  
Assistant City Attorney  
3 CITY OF CULVER CITY  
9770 Culver Blvd  
4 Culver City, California 90232  
Telephone: 310.253.5660  
5 Fax: 310.253.5664

6 DAVID E. CRANSTON (SBN 122558)  
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9 GREENBERG GLUSKER FIELDS CLAMAN &  
MACHTINGER LLP  
10 1900 Avenue of the Stars, 21st Floor  
Los Angeles, California 90067-4590  
11 Telephone: 310.553.3610  
12 Fax: 310.553.0687

13 Attorneys for Petitioner  
CITY OF CULVER CITY

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
15 COUNTY OF LOS ANGELES  
16

17 COMMUNITY HEALTH COUNCILS,  
18 INC. et al.

19 Petitioner,

20 v.

21 COUNTY OF LOS ANGELES, and DOES  
22 1 - 30, Inclusive,

23 Respondents,

24 PLAINS EXPLORATION AND  
25 PRODUCTION COMPANY, a Delaware  
corporation et al.,

26 Real Parties in Interest.

27 AND CONSOLIDATED CASES  
28

Lead Case No. BS118018  
(Consolidated with BS118023, BS118039,  
BS118056)

Assigned To: Hon. James C. Chalfant

**STIPULATION TO STAY ACTION AND  
[PROPOSED] ORDER**

Action filing dates: Nov. 25, Nov. 26 &  
Dec. 1, 2008

Trial date: July 15, 2011

**EXHIBIT B**

1           **IT IS HEREBY STIPULATED AND AGREED** by and among Petitioners, the City of  
2 Culver City, Community Health Councils, Inc., Natural Resources Defense Council, Mark Salkin,  
3 Concerned Citizens of South Central Los Angeles, and Citizens Coalitions for a Safe Community  
4 (collectively "Petitioners"), Respondent, County of Los Angeles ("County") and Real Party-in-  
5 Interest, Plains Exploration and Production Company ("PXP")(referred to herein collectively as  
6 the "Settling Parties"), through the undersigned, their respective counsel of record, in reference to  
7 the following facts:

8           WHEREAS, the following four consolidated cases (hereinafter collectively the  
9 "Consolidated Cases"), were each filed in the Superior Court of the State of California, County of  
10 Los Angeles:

- 11           a.     Lead case *Community Health Councils, Inc., Natural Resources Defense Council*  
12                 *and Mark Salkin, petitioners, v. County of Los Angeles, respondents, and Plains*  
13                 *Exploration and Production Company, et al., real parties in interest* (Case No.  
                    BS118018);
- 14           b.     *City of Culver City, petitioner and plaintiff, v. County of Los Angeles, Los Angeles*  
15                 *County Board of Supervisors, respondents, and Plains Exploration and*  
16                 *Production Company, et al., real parties in interest* (Case No. BS118023);
- 17           c.     *Concerned Citizens of South Central Los Angeles, petitioner, v. County of*  
18                 *Los Angeles, respondents, and Plains Exploration and Production Company, et*  
19                 *al., real parties in interest* (Case No. BS118039); and
- 20           d.     *Citizen's Coalition for a Safe Community, petitioner, v. County of Los Angeles,*  
21                 *Board of Supervisors of the County of Los Angeles, respondents, and Plains*  
22                 *Exploration and Production Company, et al., real parties in interest* (Case No.  
                    BS118056).

23           WHEREAS, the Settling Parties have been engaged in settlement negotiations of the  
24 Consolidated Cases and have reached a settlement of the Consolidated Cases, and have entered  
25 into a written settlement agreement (the "Settlement Agreement");

26  
27           WHEREAS, the Settling Parties believe that all necessary and appropriate approvals have  
28 been obtained and that the Settlement Agreement is procedurally proper, and enforceable; but to

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**EXHIBIT B**

1 preserve the Settling Parties' rights in the event a challenge is brought against the County's  
2 approval of the Settlement Agreement, the Settling Parties have agreed that the dismissal of the  
3 Consolidated Cases should not be filed until the time has run for any challenge to be asserted  
4 against the County's approval;

5  
6 WHEREAS, in consideration of the obligations and promises as set forth in the Settlement  
7 Agreement, Petitioners have agreed to file requests for dismissal of the Consolidated Cases and  
8 take any other necessary steps to dismiss the Consolidated Cases (the "Dismissal Request")  
9 within 180 days after execution of the Settlement Agreement by all Settling Parties, unless the  
10 County's approval of the Settlement Agreement is timely challenged, or alleged to be, in which  
11 case, Petitioners will file the Dismissal Request only if the challenge is unsuccessful and all  
12 avenues of appeal have been exhausted or the time has run to do so (collectively the "Challenge  
13 Period");

14  
15 WHEREAS, the Settling Parties desire a stay of the action until the Challenge Period has  
16 expired and thereafter dismissal of the Consolidated Cases are effected or, in the alternative, in  
17 the unlikely event that any challenge is brought and it succeeds in setting the County approval  
18 aside, voiding the Settlement Agreement or otherwise rendering it unenforceable, then the  
19 Settling Parties desire that the stay then be lifted and a trial date set;

20  
21 WHEREAS, the Settling Parties each consent to the proposed stay; and

22  
23 **IT IS THEREFORE HEREBY STIPULATED AND AGREED** by and between  
24 Petitioners, the County and PXP as follows:

- 25 1. The action before the Court shall be stayed in its entirety until the later of (1) 180  
26 days after execution of the Settlement Agreement, January \_\_\_\_, 2012 or (2) if  
27 the Settlement Agreement is timely challenged, or alleged to be, until the  
28 Challenge Period has expired.

**EXHIBIT B**

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- 2. Petitioners will file requests for dismissal of the Consolidated Cases and take any other necessary steps to dismiss the Consolidated Cases immediately following the end of the Challenge Period.
- 3. Alternatively, if the County's approval is set aside, the Settlement Agreement is determined to be unenforceable or void, and all avenues of appeal have been exhausted or waived, then Petitioners shall promptly give notice of same to the Court, the stay shall be lifted and will request that a trial date shall be set.

**IT IS SO STIPULATED.**

DATED: July \_\_, 2011

COUNTY OF LOS ANGELES

By: \_\_\_\_\_  
ELAINE M. LEMKE  
Attorneys for Respondent  
COUNTY OF LOS ANGELES

DATED: July \_\_, 2011

GIBSON DUNN & CRUTCHER LLP

By: \_\_\_\_\_  
JEFFREY D. DINTZER  
Attorneys for Real Parties in Interest  
PLAINS EXPLORATION AND  
PRODUCTION COMPANY, PLAINS  
RESOURCES, INC. AND THE LLOYD  
CORPORATION

DATED: July \_\_, 2011

GREENBERG GLUSKER FIELDS CLAMAN  
& MACHTINGER LLP

By: \_\_\_\_\_  
DAVID E. CRANSTON  
Attorneys for Petitioner CITY OF CULVER  
CITY



**EXHIBIT B**

1 DATED: July \_\_, 2011

HARDING LARMORE KUTCHER & KOZAL  
LLP

2

3

4

By: \_\_\_\_\_

KENNETH L. KUTCHER  
Attorneys for Petitioners COMMUNITY  
HEALTH COUNCILS, INC., NATURAL  
RESOURCES DEFENSE COUNCIL &  
MARK SALKIN

5

6

7 DATED: July \_\_, 2011

NATURAL RESOURCES DEFENSE  
COUNCIL

8

9

10

By: \_\_\_\_\_

DAMON NAGAMI  
Attorneys for Petitioners COMMUNITY  
HEALTH COUNCILS; NATURAL  
RESOURCES DEFENSE COUNCIL &  
MARK SALKIN

11

12

13

14

15 DATED: July \_\_, 2011

LAW OFFICES OF TODD T. CARDIFF

16

17

By: \_\_\_\_\_

TODD T. CARDIFF  
Attorneys for Petitioner CITIZEN'S  
COALITION FOR A SAFE COMMUNITY

18

19

20 DATED: July \_\_, 2011

THE CITY PROJECT

21

22

By: \_\_\_\_\_

ROBERT GARCIA  
Attorneys for Petitioner CONCERNED  
CITIZENS OF SOUTH CENTRAL LOS  
ANGELES

23

24

25

**ORDER**

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27

The Court having considered the foregoing Stipulation of the Settling Parties, and good  
cause appearing therefore,

28

**EXHIBIT B**

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IT IS HEREBY ORDERED:

- (1) All terms of the foregoing Stipulation are hereby adopted as an Order of this Court;
- (2) The action before the Court shall be stayed in its entirety until the later of (1) 180 days after execution of the Settlement Agreement, January \_\_\_\_\_, 2012 or (2) if the Settlement Agreement is timely challenged, or alleged to be, until such time the challenge is determined to be unsuccessful and all avenues of appeal have been exhausted or the time has run to do so (collectively the "Challenge Period").
- (3) Petitioners will either:
  - a. file requests for dismissal of the Consolidated Cases and take any other necessary steps to dismiss the Consolidated Cases immediately following the end of the Challenge Period; or,
  - b. if the Settlement Agreement is set aside, or determined to be unenforceable or void, and all avenues of appeal challenging such a decision have been exhausted or waived, then Petitioners shall promptly give notice of same to the Court, the stay shall be lifted and a trial date shall be set.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. JAMES C. CHALFANT  
JUDGE OF THE SUPERIOR COURT



Los Angeles County  
Department of Regional Planning



*Planning for the Challenges Ahead*

Richard J. Bruckner  
Director

December 12, 2011

Laura Vlk, Senior EH&S Specialist  
Plains Exploration & Production Company (PXP)  
5640 S. Fairfax Avenue  
Los Angeles, CA 90056

RE: Baldwin Hills Community Standards District (CSD)  
Request for Annual Well Increase in Accordance with the  
Settlement Agreement and Mutual Release Effective July 15, 2011

Dear Ms. Vlk:

Pursuant to the Baldwin Hills CSD Settlement Agreement and Mutual Release, on behalf of the Los Angeles County Department of Regional Planning, I am responding to your request dated October 10, 2011 to allow an increase of the number of wells that may be drilled or re-drilled annually in the unincorporated portion of the Baldwin Hills oil field. Paragraph 4.b of the subject Settlement Agreement entered into by the parties to the litigation challenging the County's approval of the CSD allowed for the increase of the number of wells annually drilled. In order to increase the number of wells allowed in a calendar year from 30 to 35, the Director of Regional Planning, after review, must determine that the CSD has been effective in protecting the health, safety, and general welfare of the public. As required by the Settlement Agreement, this review was conducted after Plains Exploration and Production Company ("PXP") had drilled the 50<sup>th</sup> well since the adoption of the CSD. Attached is the report documenting the County's findings. I concur with and adopt the findings and conclusions in that report.

Based on the attached report, we have concluded that the CSD has been effective in protecting the health, safety and general welfare of the public. Accordingly, PXP may drill or re-drill up to 35 wells per calendar year pursuant to a Director's Review for the individual oil wells. Thus, for the remainder of this year and future calendar years, PXP may drill up to 35 oil wells per calendar year, pursuant to a Director's review and so long as any wells to be drilled are identified in the current year's Annual Drilling Plan and so long as the drilling and activities associated with the drilling are otherwise consistent and in compliance with the provisions of the CSD.

If you have any additional questions, you may contact Rena Kambara or Pat Hachiya at (213) 974-6453.

Sincerely,



Richard J. Bruckner  
Director

Attachment

**PXP BALDWIN HILLS COMMUNITY STANDARDS DISTRICT (CSD)  
ANNUAL WELL INCREASE EVALUATION**

---

Provision 4.b of the Settlement Agreement and Mutual General Release (“Settlement Agreement”) entered into July 15, 2011 states the following:

*“Until such time as PXP has drilled or redrilled 50 wells since the adoption of the CSD, or 24 months from the date of this Agreement, whichever is sooner (“Time Period One”), no more than 30 wells may be drilled or re-drilled in any calendar year pursuant to a Director’s Review as set forth in the CSD (hereinafter Director’s Review). At the end of Time Period One, and if the County determines, pursuant to its review of the CSD by the Director of Regional Planning, that the CSD has been effective in protecting the health, safety, and general welfare of the public, thereafter (the “Full Operational Period”) no more than 35 wells may be drilled or re-drilled in the calendar year pursuant to Director’s Review”.*

In October of 2011 PXP drilled the 50<sup>th</sup> well since the adoption of the CSD. On October 10, 2011 PXP submitted a request to Los Angeles County (“County”) Department of Regional Planning (“Regional Planning”) asking for the annual increase to 35 wells as allowed by provision 4.b of the Settlement Agreement.

In order for Regional Planning to approve the request to increase the number of annual wells to 35, the Director of Regional Planning (“Director”) must review the CSD and find that the CSD has been effective in protecting the health, safety, and general welfare of the public.

This document presents the result of the CSD review that was conducted to determine if the CSD has been effective in protecting the health, safety, and general welfare of the public. The review focused on the areas of the CSD that are related to health, safety and general welfare of the public. The relevant areas of the CSD included the following:

- Noise
- Vibration
- Air Emissions
- Odors
- Ground Movement
- Visual/ Aesthetics
- Safety and Risk of Upset
- Fire Protection/Emergency Response
- Ground Water Quality

For each of these areas a review was conducted of the relevant CSD provisions to determine if they have been effective in protecting the health, safety, and general welfare of the public. The remainder of this document presents the results of the review for each area. Based upon this

**PXP BALDWIN HILLS COMMUNITY STANDARDS DISTRICT (CSD)  
ANNUAL WELL INCREASE EVALUATION**

---

review the CSD has been found to be effective thus far in protecting the health, safety, and general welfare of the public.

**A. Noise**

CSD Section 22.44.142.E.5 of Title 22 of the County Code addresses noise related impacts. Provision E.5.a covers noise limits for the oil field. These noise limits were established to ensure that the noise from the oil field would not represent a significant impact to the areas surrounding the oil field. Noise limits cover construction, general operations and drilling. PXP, The Los Angeles County Department of Public Health (“Public Health”), and the County’s Environmental Compliance Coordinator (MRS) have conducted extensive noise monitoring at the oil field and in the areas surrounding the oil field to determine if PXP has been in compliance with the noise limits specified in the provision E.5.a of the CSD.

As part of the 2010 Environmental Quality Assurance Program (EQAP) audit conducted by Regional Planning, Steve Rogers Acoustics (SRA) conducted a review of the noise monitoring performed to date by Behrens & Associates, Inc. during the drilling of selected new well. During this review SRA checked for apparent compliance with the drilling noise limits and noise monitoring requirements of the CSD. The report by SRA dated August 31, 2011 identified no noise exceedences resulting from drilling operations.

Noise monitoring conducted by MRS and Public Health showed that the oil field has been in compliance with the noise limits specified in provision E.5.a of the CSD.

As part of the 2010 EQAP audit, Regional Planning reviewed compliance with the quiet mode drilling plan (CSD provision E.5.c). The audit found that PXP was implementing all of the requirements of the plan, and that all of the required noise pads and boards were in place. As discussed above, a review of the noise monitoring data for drilling showed that the drilling operations were in compliance with the CSD noise limits. These results indicate that the quiet mode drilling plan is effective at limiting noise from drilling to levels below what would be considered detrimental to the health and welfare of the public.

Between January 2009 and the end of the third quarter of 2011, there were 22 noise complaints. PXP, in consultation with the County, investigated each complaint. Eleven of these complaints were determined not to be related to oil field operations, and were identified to be related to other noise sources. Four of the complaints were possibly related to oil field activities, and the remaining seven could not be identified or confirmed to have originated from the oil field. A review of noise monitoring data indicates that the four events possibly related to oil field operations did not exceed the noise limits specified in the CSD.

**PXP BALDWIN HILLS COMMUNITY STANDARDS DISTRICT (CSD)  
ANNUAL WELL INCREASE EVALUATION**

---

Two of the noise complaints possibly related to oil field activities appeared to stem from operations at the pipe storage rack. PXP is in the process of relocating the pipe rack storage area from the southeast portion of the oil field, near the main office, to the center of the oil field, just east of the Vickers bioremediation farm. This new location is a greater distance from residential noise receptors. None of the noise complaints were found to be related to the drilling operations. As a result of the CSD requirements, PXP has actively addressed noise complaints related to oil field operations and made changes to operations to reduce the level of noise impacting surrounding areas using techniques such as installing additional sound walls around specific pieces of equipment.

Review of the PXP 2010 EQAP Compliance Report, the 2010 EQAP Audit Report prepared by the County, the noise monitoring data collected by PXP, Public Health, and the County's Environmental Compliance Coordinator, and the complaint log shows that the CSD has been effective at keeping noise to a level considered protective of the health and general welfare of the public.

**B. Vibration**

CSD Section 22.44.142.E.6 of Title 22 of the County Code addresses vibration related impacts. Provision E.6 requires vibration levels related to oil field operations not exceed a velocity of 0.25 mm/s over a frequency range of 1 to 100 Hz at any developed area. This vibration level was established by the County to be protective of health and welfare of the public. Vibration monitoring for drilling operations have shown that the drilling operations do not exceed the 0.25 mm/s level. Drilling vibration has been measured at a high of 0.1 mm/sec at a distance of 50 feet from the drill rig, which is well below the standard established in the CSD.

Between January 2009 and the end of the third quarter of 2011 there were five vibration complaints. Three of these complaints were determined to be related to operations at the gas plant flare. These three complaints occurred in 2009 and the first quarter of 2010. PXP made changes to the operations of the flare, as required by the CSD (provision L.5.b), to reduce the vibration caused by the flare. Since early February 2010, there have been no vibration complaints related to the operation of the flare.

PXP, in consultation with the County, investigated the two remaining complaints and determined they were likely unrelated to oil field operations. One of the complaints was a concern about drilling vibration, but at the time of the complaint the drill rig was not in operation.

Review of the PXP 2010 EQAP Compliance Report, the 2010 EQAP Audit Report prepared by the County, drilling vibration data, and the complaint log shows that the CSD has been effective

**PXP BALDWIN HILLS COMMUNITY STANDARDS DISTRICT (CSD)  
ANNUAL WELL INCREASE EVALUATION**

---

at keeping vibration to a level considered protective of the health and general welfare of the public.

**C. Air Emissions**

CSD Section 22.44.142.E.2 of Title 22 of the County Code addresses air quality and public health related to air emission impacts. Provision E.2.d requires an Air Monitoring Plan to detect emissions of hydrocarbon and hydrogen sulfide that could impact the health and general welfare of the public. The monitoring plan covers the gas plant, drilling, and redrilling operations. The County reviewed the air monitoring data for 2010 through the end of the second quarter of 2011, and found no exceedences of the limits specified in the provision E.2.d of the CSD.

CSD provision E.2.e requires PXP to have a portable flare available for use during drilling, and to have the flare in operation when drilling through the Nodular Shale. PXP has had the portable flare connected, and in operation, for all wells drilled since the resumption of drilling in 2010. Review of the drilling records for 2010 through the second quarter of 2011 show that no gas has been directed to the flare as part of the drilling operations, and that the flare has been connected and in operation for all wells drilled, which is above and beyond the requirements of the CSD.

CSD provision E.2.f requires PXP to install a pressure monitoring system on all tanks that contain or could contain oil. This monitoring system is used to monitor the pressure in the vapor space of the tanks to ensure that hydrocarbon vapors are not released into the atmosphere due to over pressurization of the tanks. The County reviewed the pressure monitoring data for 2010 through the end of the second quarter of 2011, and found that there had been no pressure readings that would have indicated a vapor release from the tanks.

CSD provision E.2.l covers the installation of controls for air emission from off road construction equipment. PXP provided the County with California Air Resources Board (“CARB”) certifications for the off road construction equipment that demonstrates engine compliance with the Tier III standard. This ensures that the engines have an 80 percent or greater reduction in hydrocarbon emissions. PXP also provided the County with CARB certificates demonstrating that the off road construction engines are equipped with a Level 3 diesel catalyst. These level 3 catalysts reduce diesel particulate by at least 85 percent. The County Environmental Compliance Coordinator field-verified that applicable off road construction equipment engines matched the CARB certifications provided by PXP. The October 2008 Baldwin Hills Community Standard District Final EIR found that diesel particulate emissions were the largest contributor to health risk from oil operations.

CSD provision E.2.m covers the installation of controls for air emission from drill rigs. The County Environmental Compliance Coordinator verified that the drill rig used at the oil field is

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equipped with Tier II or better engines. PXP provided the County with source test data for the drill rig that demonstrates engine compliance with the CSD requirements. These requirements ensure that the engines have a 90 percent or greater reduction in hydrocarbon and diesel particulate matter emission smaller than 10 microns. The County Environmental Compliance Coordinator field-verified that drill rig engines have the heavy duty diesel catalysts installed for both hydrocarbon and particulate matter control. The Baldwin Hills EIR found that diesel particulate emissions were the largest contributor to health risk from oil operations.

CSD provision E.2.p requires PXP to implement a Fugitive Dust Control Plan. The PXP 2010 EQAP Compliance Report and the 2010 EQAP Audit Report prepared by the County showed that PXP has been implementing the requirements of the approved Fugitive Dust Control Plan. Review of the complaint log from 2009 through third quarter of 2011 show that there have been no dust complaints since the fourth quarter of 2009, which is about the time the Fugitive Dust Plan was fully implemented. In the fourth quarter of 2009 there were two dust complaints in the early evening of the same day. An Air Quality Management District (AQMD) inspector found that the wind had been blowing at 30 to 40 mph that day, and was likely generating dust from areas within the field. PXP had stopped all work at the site two hours prior to the first complaint. The following morning, PXP resumed watering of the roads within the oil field. With full implementation of the Fugitive Dust Control Plan, the issue of dust from the oil field appears to have been reduced to acceptable levels as reflected by the absence of dust complaints since the end of October 2009.

Provision E.32 of the CSD requires PXP to conduct annual soil gas testing in the vicinity of abandoned wells. This testing is required to determine if hydrocarbon vapors are being emitted from the ground in concentrations that could present a risk to public health. In 2010, a total of 96 locations were tested for soil gas hydrocarbons. Of the 96 locations, only six showed soil gas methane reading above 500 ppm. The highest reading was 2,468 ppm. As part of the soil gas testing study surface air testing was conducted at the twelve locations where soil gas levels were above 50 ppm. In all 12 tests, no methane in the surface air was detected. The South Coast Air Quality Management District (SCAQMD) Rule 1150.1 regulates methane emissions from soil. This rule limits surface air emissions of methane to less than 500 ppm. All of the surface air samples collected were below this level. The study found that there was no evidence of leaking wells, pipeline or natural seepage.

Review of the PXP 2010 EQAP Compliance Report, the 2010 EQAP Audit Report prepared by the County, air monitoring records, soil gas monitoring studies, equipment records, field verification, and the complaint log shows that the CSD has been effective at keeping air emissions to levels considered protective of the health and general welfare of the public.



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**D. Odors**

CSD Section 22.44.142.E.2 of Title 22 of the County Code addresses odors. Provision E.2.c requires PXP to implement an Odor Minimization Plan. This plan serves to reduce odors from the operation and requires a log of odor complaints and steps to be taken to reduce odors from the facility. As part of this plan, PXP is required to use odor suppressants for the bioremediation farms (CSD provision E.2.g) and for the drilling operations (CSD provision E.2.h). The County Environmental Compliance Coordinator has routinely verified that the odor suppressants are being regularly used at the bioremediation farms and for the drilling operations. Soil remediation activities at all three bioremediation farms have been ongoing since the CSD became effective and odor suppressants have been used during material loading and tilling of each farm.

Between January 2009 and the end of the third quarter of 2011 there have been 48 odor complaints. This represents over 50 percent of all of the complaints received since the adoption of the CSD. PXP, in consultation with the AQMD and the County, investigated each complaint. It is very difficult to pinpoint the source of an odor based upon a complaint because there typically is a delay between when the odor is reported and when an investigation can begin. In most instances, the odor is gone by the time an investigator arrives at the site of the complaint.

As part of the CSD requirements, PXP was required to install a meteorological station at the oil field (CSD provision E.2.j), which continuously monitors and records the wind direction and speed. In conducting odor complaint investigations, PXP and the County have used the meteorological station wind speed and direction to determine if the odor could have originated from the oil field. For any odor to have originated at the oil field, the wind would had to have been blowing from the oil field in the direction of the location of the complaint at the time the complaint was made.

Review of the odor complaints and associated meteorological data indicates that for 36 of the 48 complaints, it is unlikely the oil field was the source of the odor because the wind was not blowing in the correct direction at the time of the odor complaint. Three of the remaining odor complaints were determined to be skunks. For one of the remaining complaints, an AQMD inspector thought the odor could have been coming from a workover rig that was working on a well nearby the area of the complaint. The County determined that two of the odor complaints were likely due to an instrument air line breakdown. The source of the remaining six odor complaints could not be confirmed, but could have originated from the oil field.

The County also reviewed the air monitoring data at the time of each odor complaint, and found that there had been no unusual increase in the levels of hydrocarbons or hydrogen sulfide. This fact indicates that the level of odor was not high enough to represent a health risk to the public. Given that in over two and three-quarter years only one odor complaint was likely attributable to

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a workover rig operation, two attributable to a breakdown at the oil field, and an additional six could have been from the oil field but the source was never definitively identified, the County concludes that the CSD has been effective at keeping odors to levels considered protective of the health and general welfare of the public.

**E. Ground Movement**

CSD Section 22.44.142.E.4 of Title 22 of the County Code addresses ground movement. Provision E.4.e requires PXP to perform annual ground movement surveys to determine the extent of ground movement over the past year. If the ground movement has been equal to or greater than 0.6 inches at any given location in an upward or downward direction in the vicinity of or in the oil field, then PXP must conduct a study to review and analyze all claims or complaints of subsidence damage that have been submitted to the PXP or the County by the public or a public entity in the 12 months since the last ground movement survey. If this study determines that the ground movement was the result of oil operations, then DOGGR will evaluate the fluid injection and withdrawal rates at the oil field to determine whether adjustments to these rates may alleviate the ground movement, and if so, where in the oil field such adjustments should be made.

The first annual ground movement survey was conducted in 2011 and found that seven of the 42 monitoring stations in and around the oil field showed ground movement in excess of the 0.6 inches. Five of these locations were in the southeast area of the oil field including two in the Windsor Hills area. The other two were located in the north area of the oil field. One was just outside of the oil field near the corner of La Cienega Boulevard and Kenneth Hahn State Park. The final location is just northwest of the oil field in Culver City.

Based upon the survey results, the Los Angeles County Department of Public Works (“Public Works”) has requested that PXP conduct a study to determine if these ground movements are related to oil field operations and to review and analyze all claims or complaints of subsidence damage that have been submitted to PXP or the County by the public or a public entity in the 12 months since the last ground movement survey. Because this was the first ground movement survey, PXP will need to investigate all subsidence damage claims and complaints since the implementation of the CSD. To date there have been 12 complaints covering ground movement and structural damage.

The conclusion from the ground movement survey and Geotechnical Report was that there did not appear to be any trends in the land-based ground level survey, the satellite survey, and oil field activities over the 2010 reporting period from which correlations can be drawn relative to oil field activities resulting in ground movement. At this time, the data suggested that the recorded ground movement may be related to movement of the Newport-Inglewood fault zone.

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However, the final determination of whether oil field operations are causing ground movement sufficient to result in the reported structural damage will be based upon the study that is currently being conducted by PXP. If it is determined that the oil field operations have resulted in ground movement sufficient to cause structural damage, then as required by the CSD, DOGGR will evaluate the fluid injection and withdrawal rates at the oil field to determine whether adjustments to these rates may alleviate the ground movement, and if so, where in the oil field such adjustments should be made.

Review of the US Geological Survey's online earthquake database for the calendar year 2010 shows that only one earthquake, a magnitude 2.0, occurred within a two kilometer radius of the oil field. The USGS information indicates that the epicenter of that earthquake was located to the southwest of the limits of the oil field near Overland Street at a depth of approximately 12 km (7 miles) below oilfield activities. This would indicate that the oil field operations are not inducing seismic activity in the area.

As discussed above, the CSD provision covering ground movement has specific requirements of actions to be taken to alleviate ground movement causing structural damage if the ground movement is being caused by oil field operations. As such, the CSD provides a mechanism to ensure that ground movement is identified and maintained or mitigated to a level that is considered protective of the safety, health and general welfare of the public.

**F. Visual/ Aesthetics**

CSD Sections 22.44.142.E and L of Title 22 of the County Code addresses visual and aesthetic impacts. Provision E.10 requires PXP to install landscaping around the oil field based upon a Landscaping Plan approved by Regional Planning. PXP is currently in the process of installing landscaping along various portions of the perimeter of the field. As identified in the approved Landscaping Plan, the landscaping is being installed in phases. Once complete, the landscaping will improve the overall visual impacts and aesthetics of the area around the oil field.

Provision L.14 of the CSD requires PXP to prepare an Equipment Removal Plan, which identifies unused or abandoned equipment and materials to be removed from the oil field. To date, PXP identified and removed over 60 unused or abandoned pieces of equipment from the oil field, which reduced the amount of visible blight at the site. PXP continues to identify unused equipment and then remove the equipment from the oil field.

Provision E.14 of the CSD has required PXP to paint all oil operation related structures visible from public roadways and surrounding properties a dark color approved by Regional Planning. PXP has completed painting of the visible structures. The dark color has helped to blend the

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equipment into the background, thereby reducing the visual and aesthetic impacts of the oil field equipment.

Provision E.21.c requires PXP to remove and keep the oil field free of debris and vegetation overgrowth. As discussed above, PXP removed unused and abandoned equipment and conducted a vegetation clearing program to control the overgrowth of vegetation at the site. These activities have improved the overall visual and aesthetic appearance of the oil field.

As a result of the CSD, PXP has removed unused and abandoned equipment, painted the visible oil-related structures, removed debris and vegetation overgrowth, and is installing landscaping around portions of the oil field. All of these actions have improved the visual and aesthetic appearance of the oil field, which serves to enhance the general welfare of the public.

**G. Safety and Risk of Upset**

CSD Sections 22.44.142.E.3, 22.44.142.F, and 22.44.142.L.3 of Title 22 of the County Code addresses safety and risk of upset impacts. Provision E.3.b required the fire-proofing of all propane and natural gas liquid bullets (pressurized tanks used to store propane and natural gas liquids) and the use of an automatic deluge system. PXP fire-proofed these bullets and installed a deluge system. With this fire-proofing and deluge system, the potential for a propane or natural gas fire at the bullets has been substantially reduced.

Provision E.3.d required that PXP ensure that the secondary containment for oil tanks are capable of holding 110 percent of the capacity of the largest oil tank. This provision also required that the retention basins be capable of handling the 100-year storm event, and that all above ground pipelines be protected by basins for secondary containment to prevent spills from leaving the oil field. PXP conducted a number of studies to demonstrate that the proper secondary containment was in place and that the retention basins were adequately sized. The County Environmental Compliance Coordinator visually inspected the secondary containment, and Public Works reviewed and approved the retention basin capacities. All of these measures serve to assure that in the unlikely event of an oil or produced-water spill that the spilled material would be contained within the oil field and not impact areas outside of the oil field. Since implementation of the CSD, there have been no spills of oil or produced-water that have migrated or spilled offsite.

Provision E.29.e of the CSD required PXP to install tank bottom detection systems on all tanks at the oil field. PXP has these systems in place, which serve to detect any leaks from tank bottoms, thereby minimizing any potential spills by early detection of leaks.

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Between January 2010 and the end of the third quarter of 2011, there have been three reportable spills at the oil field that ranged in size from 30 barrels to 2.25 barrels. Two of the spills were oil and one was a mixture of oil and produced-water. All of these spills were contained within the oil field and were quickly cleaned up by PXP staff. There were no complaints that occurred during the period around these incidents.

Provision F.3 of the CSD required PXP to implement a Safety Inspection, Maintenance, and Quality Assurance Program ("SIMQAP"). This program, which is now in place, requires regular maintenance and safety inspections of oil field equipment. The program serves to improve overall safety and reliability of the oil field equipment, thereby reducing the likelihood of equipment failure that could lead to a release of hydrocarbons into the environment. The SIMQAP was reviewed as part of the 2010 EQAP audit conducted by the County.

Provision L.3.b of the CSD required PXP to conduct a gas plant safety audit. The audit identified approximately 20 corrective action items, all of which have been completed. Implementation of the corrective action items from the audit has improved the overall safety of the gas plant. The corrective action plan from the gas plant audit was reviewed as part of the 2010 EQAP audit conducted by the County.

Between January 2010 and the end of the third quarter of 2011, there have been only three reportable breakdowns at the oil field. One of the breakdowns was due to an electrical power loss that resulted from a hawk landing on one of Southern California Edison's transmission lines, which caused a short. This resulted in the 30 barrel spill of produced-water and oil as discussed above. The spill was contained with the secondary containment. The second breakdown was due to failure of a valve controller. The third breakdown was due to a failure of an instrument air line. These two breakdowns did not result in any spill of oil or produced-water, but did result in the release of approximately 7.5 pounds of hydrocarbon air emissions. In all cases, PXP took immediate steps to shutdown the facilities to minimize any releases. The County determined that two of the odor complaints were likely due to the instrument air line breakdown. There were no complaints associated with the other two breakdowns.

As a result of the CSD, PXP substantially reduced the likelihood of spills occurring at the facility, reduced the likelihood of spills traveling outside of the oil field, and improved the overall safety of the oil field operations. All of these actions reduce the likelihood of an event occurring at the oil field that could impact the public, and have increased the protection of the safety, health and general welfare of the public.

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**H. Fire Protection/Emergency Response**

CSD Sections 22.44.142.E.1 and 22.44.142.L.1 of Title 22 of the County Code addresses fire protection and emergency response. Provision E.1.a required PXP to install a community alert notification system (CAN) to allow for automatic notification of area residences and businesses in the event of an emergency arising at the oil field that could require residents or inhabitants to take shelter, evacuate, or take other protective actions. PXP installed the CAN system and tests the system on an annual basis. To date, the CAN system has not had to be activated.

Provision E.1.b of the CSD requires that PXP conduct spill containment response training on an annual basis, and that the sufficient oil spill containment and clean up equipment be maintained on site to handle the contents of the largest oil tank on the oil field. The 2010 EQAP audit conducted by the County verified that spill response training had been conducted in 2010, and that sufficient oil spill response equipment was on site to deal with the maximum spill size. The training received by employees helps to ensure that in the unlikely event of a spill it would be contained quickly and within the oil field.

Provision E.1.c of the CSD requires that PXP maintain and fully implement an emergency response plan. The 2010 EQAP audit conducted by the County verified that an updated emergency response plan was in place and was being fully implemented. This plan provides a number of spill prevention control and counter measure items that have reduced the likelihood of an oil spill, and ensured that in the unlikely event of a spill it would be contained quickly and within the oil field.

Provision L.1 of the CSD requires PXP to conduct a fire protection audit of the oil field's fire protection capabilities to evaluate compliance with NFPA requirements, the County fire code, the County Fire Department regulations, California Code of Regulations, and API requirements. PXP conducted the audit in consultation with County and Culver City Fire Departments. The results of the audit showed that the oil field was in compliance with all applicable fire protection regulations.

Between January 2010 and the end of the third quarter of 2011, there were eight small fires at the oil field that were quickly contained by PXP staff. Six of these fires were caused by electrical power line issues that sparked and started the fire. Two of these electrical fires were caused by small animals. One of the fires started outside of the oil field and moved onto the field. The County Fire Department determined that the last fire was attributed to a cigarette thrown out of car. PXP quickly responded to all of these fires and was able to extinguish the fires before they spread.

PXP BALDWIN HILLS

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# 2011 EQAP AUDIT REPORT

**Marine Research Specialists**

**9/25/2012**

## 2011/2012 EQAP AUDIT REPORT

### SUMMARY

This report provides an overview of the 2011 Environmental Quality Assurance Program (EQAP) audit conducted by Marine Research Specialists (MRS) and the LA County Department of Regional Planning on June 13, 2012 at the Plains Exploration and Production (PXP) offices in Los Angeles, California. An initial review of PXP's compliance matrix was conducted by MRS on March 16, 2012.

The audit consisted of both a comprehensive file review of reports, plans, and various documentation logs, as well as a field review of operations and maintenance procedures. Additionally, MRS assessed the implementation status of the previous year's recommendations.

The overall findings of the audit were positive, confirming PXP's compliance with the EQAP-related mitigation measures identified in the Baldwin Hills Community Standards District (CSD). In conducting the 2011 EQAP audit, two recommendations were developed for potential improvements that would ensure continued compliance with the EQAP-related provisions of the CSD. However, since the time of the file and field review, PXP has complied with both of the recommendations, which are listed below.

### *Findings/Recommendations*

1. Ombudsperson: Add PXP's time of response to written complaints log in order to provide documentation that PXP responds within 1 hour as specified in the CSD (section J.3);
2. Water Management Plan: Provide an updated plan that identifies the projected water usage numbers. Confirm the same number is reflected in the Recycled Water Report and obtain approval.

### BACKGROUND

PXP operates the Inglewood Oil Field in the Baldwin Hills Zoned District of Los Angeles County. Existing operations of the oil field include the extraction of oil and gas from subsurface reservoirs, removal of water from the crude oil, removal of impurities and gas liquids from the gas, and shipping of crude oil through pipelines to refineries located in Southern California.

On October 28, 2008, the Los Angeles County Board of Supervisors adopted the Baldwin Hills CSD to provide a means of implementing regulations, safeguards, and controls for activities related to drilling for and production of oil and gas within the oil field located in the Baldwin Hills area of Los Angeles County (PXP 2010 EQAP Report).

The Environmental Quality Assurance Program (EQAP) entails the preparation of an EQAP Program by PXP indicating how PXP intends to comply with all conditions of approval and plans that are part of the CSD (prepared in February 2008, revised in August 2008, and approved on October 28, 2008), field-monitoring to enforce compliance with environmentally protective permit conditions, preparation of an annual EQAP Report by PXP; and finally, a follow up EQAP audit



to document compliance and noncompliance items and provide recommendations as deemed appropriate.

On March 1, 2012, PXP submitted the 2011 Annual EQAP Report as required by the CSD.

On March 16, 2012, MRS conducted an initial review of the 2011 Annual EQAP Report. On June 13, 2012, MRS, along with representatives from LA County and PXP, conducted a comprehensive file and field audit of the 2011 Annual EQAP Report at PXP offices.

EQAP requirements comply with State law that mandates the adoption of a program for reporting or monitoring mitigation measures included as permit conditions for projects (Public Resources Code § 21081.6(a) and CEQA Guidelines §§ 15091(d) and 15097).

## CSD REQUIREMENT

CSD Section F.1 requires PXP to develop and implement the following:

*Environmental Quality Assurance Program (EQAP). The Operator shall comply with all provisions of an Environmental Quality Assurance Program (EQAP) that has been approved by the Director. The following provisions relate to the EQAP:*

- a. *EQAP Requirements. The EQAP shall provide a detailed description of the steps the Operator shall take to assure compliance with all provisions of this section, including but not limited to all of the monitoring programs called for by this section.*
- b. *Annual EQAP Reports. Within 60 days of the end of each calendar year, the Operator shall submit to the Director an annual EQAP report that reviews the Operator's compliance with the provisions of the EQAP over the previous year and addresses such other matters as may be requested by the Director. The Annual EQAP Report shall include the following:*
  - *A complete list and description of any and all instances where the provisions of the EQAP, or any of the monitoring programs referred to therein or in this section, were not fully and timely complied with, and an analysis to how compliance with such provisions can be improved over the coming year.*
  - *Results and analyses of all data collection efforts conducted by the Operator over the previous year pursuant to the provisions of this section.*
- c. *EQAP Updates. The EQAP shall be updated as necessary and submitted to the Director for approval along with the annual EQAP report. The EQAP updates shall be provided to the CAP and MACC for review and comment. Comments from the CAP and MACC, if timely received, shall be considered by the Director before making a decision to approve the same. The Director shall complete the review of EQAP updates as soon as practicable, and shall either approve the updated EQAP or provide the Operator with a list of specific items that must be included in the EQAP prior to approval. The Operator shall respond to any request for additional information within 30 days of receiving such request from the Director, unless extended by the Director.*

## AUDIT PARTICIPANTS

Table 1 identifies the individuals who participated in the 2011 EQAP Audit.

**Table 1 – Audit Participants**

NAME	POSITION	ORGANIZATION
Rena Kambara	Regional Planning Assistant	LA County Department of Regional Planning
Ray Mullins	Planning Consultant	Indigo Fakir Consulting
Candace Salway	EH&S Manager	PXP
Pat Gorski	Senior EH&S Advisor	PXP
Laura VlK	Senior EH&S Specialist	PXP
Lisa Paillet	Ombudsperson	PXP
Luis Perez	Senior Project Manager	MRS
Greg Chittick	Senior Scientist	MRS
Michael Cassata	Senior Planner	MRS

## 2010 RECOMMENDATIONS' STATUS

As a result of the 2010 EQAP Audit, MRS developed five recommendations for potential improvements that would ensure continued compliance with the EQAP-related provisions of the CSD. Table 2 provides the implementation status of those recommendations and Attachment A provides PXP's detailed response letter to the 2010 EQAP Audit recommendations.

**Table 2 – 2010 Recommendations' Status**

RECOMMENDATION	STATUS
1. <b>Vapor Pressure Monitoring &amp; Venting System:</b> Include a bar at the 90-percent mark in the CSD Vapor charts to more easily identify recorded alarms reflected in the daily alarm reports	<b>Not warranted at this time.</b>  Although the recommendation could be implemented, PXP operators are currently notified via page when the tank hatch pressure reaches 90 percent. Following prescribed procedure, operators troubleshoot the operation at the alarm location until the alarm is cleared then document the findings in the daily log. MRS agrees that the real time data reviewed by the operators contains the information necessary for adequate assessment of the vapor pressure levels.
2. <b>Ombudsperson:</b> Add PXP's response time to written complaints log	<b>Implemented.</b>  PXP started documenting the response time in the 2012 2 <sup>nd</sup> quarterly report.
3. <b>What If Analysis:</b> Conduct analysis of loss of power, ESD activation, and maintenance activities to help prevent potential odor events	<b>Not conducted.</b>  PXP states that the current protocols in place provide sufficient measures to reduce the possibility of excess odors under the described scenarios. MRS concurs at this time.
4. <b>Meteorological Station:</b> Analyze whether or not a back-up power source can be	<b>Not warranted at this time.</b>  Based on the third party audit, PXP states there is no

	installed to provide continuous power to the meteorological station during power outages	evidence to substantiate the need for backup since the Met Station's missing data (1.2 percent) is well below the 10 percent EPA rule. PXP will reconsider the recommendation should subsequent third party audits justify the activity. MRS concurs based on the small percentage of potential missing data.
5.	<b>Noise Monitoring:</b> Reestablish the baseline at Location 2 over a continuous 72-hour period and provide continuous audio recording	<b>Not warranted at this time.</b>  PXP states that since there have been no complaints tied to Location 2, the recommendation is not warranted. Further, all levels detected above the baseline at that location have been confirmed from audio files to have come from sources other than oilfield operations or drilling activities. PXP will reconsider the recommendation should conditions and evidence justify the activity. MRS concurs at this time.

## SITE PHOTOS

Photos at the end of this report depict various components of the 2011 oil field operations to include:

- Drill Rig
- Workover Rig
- Gas Plant Flare
- Air Monitor
- Signs
- Meteorological Station
- Biofarms & Odorant Equipment
- Noise Monitoring Equipment
- Watering Trucks

The photos were taken either during the EQAP audit field visit or during regular field visits throughout the year.

## SITE VISIT OBSERVATIONS

Some Observations during the year associated with the weekly Site Visits are listed below:

1. The drill sites throughout the year were consistently clean and organized. Five incidents involving pooling fluids were addressed in a timely manner either by using a vacuum truck or clean up pads. Odorant is routinely used in and around the drill hole and mud shakers to reduce potential drilling odors. The volume of odorant was increased when requested. The portable flare, gas buster, wind socks and alarm lights were routinely installed. Site safety protocols were active with each site visit. The Site Superintendent provided access to real-time data in the Site Superintendent's trailer when requested.
2. Two air monitors were installed at each drill site throughout the year. THC and H2S levels were consistently within acceptable range; that is, no exceedances were recorded. Recalibrations were completed when requested. Bump tests were provided

upon request by the Site Superintendent. Horn and light alarm repairs were completed when needed.

3. Inglewood Oilfield perimeter signs and drill site signs were installed in accordance with the approved Signage Plan.
4. As stated in the 2011 Meteorological Station Annual Audit and Data Validation, sensors were replaced with newly calibrated sensors in November 2011 as sensor calibration is recommended approximately every twelve months. There were no recorded sensor malfunctions in 2011 nor did any sensors require maintenance or repairs (Audit, 2011). A spot check of training records during the EQAP audit shows training was conducted on January 17, 2011, December 16, 2011 and December 19, 2011.
5. Some small number of data anomalies and gaps throughout the year related to wind speed, temperature values, and solar radiation values at night. These anomalies and gaps were determined to be nominal and are detailed in Table 1 of the 2011 Meteorological Station Annual Audit and Data Validation.
6. Additionally, the 2011 Meteorological Station Annual Audit and Data Validation states that all sensor data was not recorded on nineteen (19) occasions due to power outages for a total of 101 hours. As a result, data gaps were filled with an average between immediately-previous and immediately-following data points. This constitutes a small, negligible percentage of the total time the meteorological station was operational, within acceptable ranges of protocols.
7. Overall, the meteorological station was active and collecting the required data. Access was provided to real-time data upon request. Wind sensors were visually checked during site visits. Lastly, the meteorological station data logger was used to determine wind direction during noise and odor complaint investigations.
8. Soil remediation at all three bioremediation farms (Vickers, LAI South & LAI North) was active in 2011. Odor suppressants were used during material loading and tilling of each of the farms. Culverts were cleared free of debris when necessary. Berms surrounding the farms were installed and maintained as necessary.
9. Reports show there were no tank vapor pressure exceedances that would cause any tanks to vent.
10. The accelerometer is installed and functioning. Per the CSD, readings from the accelerometer are recorded and transmitted in real-time to the Caltech Seismological Laboratory. No seismic events exceeding 13 percent of gravity occurred that would have required operations to cease.
11. Steve Rogers Acoustics conducted a review of the noise monitoring performed to date by Behrens & Associates, Inc. (B&A) during selected new well drills on the Inglewood Oil Field, to check for compliance with the drilling noise limits and noise monitoring requirements of the CSD. The revised report by Steve Rogers Acoustics, dated August 31, 2011, identified no noise exceedances resulting from drilling operations.
12. The Stocker 650RD 24-hour noise report by Behrens and Associates for August 21, 2011 to August 22, 2011 identifies no noise exceedances. Additionally, CSD compliance during Quiet Mode Drilling Hours was observed by MRS on January 25, 2012. MRS observed soundwalls in place, rubber matting on the V-door, and crew using walkie-talkies to communicate between the drill site and the mud storage area.
13. The pipe storage area was relocated from the southeast area of the oil field, near the main office, to the south-central part of the oil field, just east of Vickers bioremediation farm.
14. In compliance with AQMD Rule 1173, wells VIC1-124 and VIC1-11 were repaired by Avanti Environmental in the required time frame. Repairs were necessary due to hydrocarbon leaks greater than 500ppm but less than 10,000ppm.

15. The incident involving a reportable release (produced water) on February 25, 2012 was reported and investigated according to protocol. A majority of the release was captured by the stormwater basin. Preliminary investigation determined that the release was caused by external corrosion on a pipe. The pipe is a 6-inch trunk line, but was only feeding an idle well that was shut in at the time. The line was subsequently removed from service.

## FIELD AUDIT/COMPLIANCE STATUS

After the initial review of PXP's 2011 Annual EQAP Report (text and compliance matrix) by MRS on March 16, 2012, the two tables included after this report's conclusion were generated to guide the file and field reviews conducted at PXP on June 13, 2012. The *Notes* column shows the results of the file and field audit.

## RECOMMENDATIONS

1. *Ombudsperson: Add PXP's response time to written complaints log.*

During the audit, the ombudsperson's inquiry log showed an organized and detailed account of all inquiries lodged to PXP from the time of reporting to confirmed follow up. However, on several occasions, the log did not identify the time the response was provided. In order to comply and document the CSD requirement of a 1-hour response time, the response time should be recorded in the log for each occurrence (Section 22.44.14.J.3).

2. *Water Management Plan: Provide an updated plan consistent with the Recycled Water Report.*

The 2009 Water Management Plan was updated in 2011; however, inconsistencies with the Recycled Water Report, dated February 8, 2012, provided by Cardno Entrix, were found regarding the amount of water used for various infrastructure and maintenance needs at the oilfield. These inconsistencies need to be remedied.

Note that both of the above recommendations were brought into compliance after the file and field review conducted on June 13, 2012. PXP has added the time of response in the quarterly reports since the second quarter 2012. PXP has received approval to their Water Management Plan by Public Works in August 2012.

## CONCLUSION

The overall findings of the audit were positive, confirming PXP's compliance with the EQAP-related mitigation measures identified in the Baldwin Hills CSD.

<b>File Review</b>				
<i>Plans, Reports and Approvals (pages 4-5)</i>			<i>Item #</i>	<i>Notes</i>
1.	Odor Complaints	Verify number of complaints – 24; only counted 23 in complaints logs	n/a	Recount during file audit confirmed there were 23 odor complaints.
2.	Noise Complaints	Verify number of complaints – 15; only counted 13 in complaints log with one of those being vibrations	n/a	Recount during file audit confirmed there were 11 odor complaints.
3.	Emergency Flare AQMD Permit	Obtain approved permit	n/a	MRS has copy of approved permit on file.
4.	Annual Hazardous Materials Plan	Check plan/confirm submittal date	9	Submitted on 12-22-11. Obtained copy of transmittal.
5.	Annual Emergency Response & Spill Response Training	Confirm training	15	Obtained copy of Spill Response Containment Training attendance list.
6.	CAN System Annual Testing	Confirm test date	24b	12-22-11 test date. Obtained copy of test notification.
<i>4.2 Data Analyses Results (page 6)</i>			<i>Item #</i>	<i>Notes</i>
7.	Meteorological Station	Check annual data validation report/identify annual submittal month	n/a	Reviewed 2011 Annual Report by InterAct dated April 2012.  See Table T-2 for information on 2010 EQAP Audit recommendation implementation status.

<b>File Review</b>				
<i>Appendix A</i>			<i>Item #</i>	<i>Notes</i>
8.	Ombudsperson	Check inquiry log and response timing	1a 16o 16s	Reviewed all four quarterly logs. PXP began implementing 2010 recommendation in 2 <sup>nd</sup> quarter of 2012.  See Table T-2 for information on 2010 EQAP Audit recommendation implementation status.
9.	Quiet Mode Drilling Procedures Training	Check training log	1c	Obtained employee training log (one page) that shows three contractors with three separate companies and dates of training – 1/19/11 & 5/11/11.
10.	Quiet Mode Drilling	Confirm implementation	1d	Observed quiet mode drilling implementation during 1-25-12 site

<b>File Review</b>				
<i>Appendix A</i>			<i>Item #</i>	<i>Notes</i>
	Implementation – Materials/Equipment			visit. See ‘Site Visit Observations’ section of the EQAP report for more details.
11.	Equipment Maint.	Check annual log	1f	Obtained copy of Ensign annual rig service log.
12.	Quiet Mode Drilling Plan Enforcement	Check acoustics engineering firm’s noise monitoring report	1n	Obtained copy of Behrens and Associates’ 24-hour report for 8-21-11 to 8-22-11 for Stocker 650RD well.
13.	Complaint Processing Procedure	Confirm and review one noise complaint procedure compliance	1o	C. Salway explained PXP’s internal procedure when receiving a complaint.
14.	Complaint Investigation and Resolution	Confirm and review one noise complaint investigation and resolution	1p	Reviewed quarterly logs. Additionally, MRS follows up with PXP regarding complaint resolution.
15.	DOGGR Permitting	Check NOI approvals	2g	Obtained copy of DOGGR permit for well VRU 4243 dated 12-9-10.
16.	Site Plan Review	Check approvals Inspect and retain copy of site plan	2h	Obtained copy of well BC 6751 site plan approval dated 2-24-11.
17.	Well Pad Construction Permitting	Check Site Specific Grading Permit(s) or confirm approval of Master Grading Plan showing required information	2j	Site specific permit not needed since Master Grading Plan shows required information. County reviews plan. None over 5,000 cubic yards.
18.	Gas Sensors (air monitoring)	Check log from three dates	6e	Visually inspected three log dates for well Stocker 650 RD1. Obtained copy of 11-16-11 calibration and testing report. Obtained copy of gas plant reports for three months (Oct – Dec). Obtained employee training log (one page) that shows three contractors with three separate companies and dates of training – 1/27/11 & 5/11/11.
		Check 5-year data storage	6h.12	
		Check (re)calibration documentation; retain copy of calibration and testing report	6i.5	
		Check personnel training log	6i.10	
19.	Met Station	Check training log	25a	Obtained PXP Training Records Report that shows training dates for five employees: 1/17/11, 12/16/11 & 12/19/11.
		Check monthly analyses	25c	Compliance documented in met station annual audit report.
		Check sensor log from three dates	25e	
		Check (re)calibration documentation	25f	Obtained copy of test certificates. See PXP 11-9-11 email to Met One.
		Check 10-year data storage	25j	n/a
20.	Alarm Reports	Confirm no quarterly report necessary or check quarterly reports	6h.10, 6h.11,	Obtained copy of 2011 3 <sup>rd</sup> quarter report.

<b>File Review</b>				
<i>Appendix A</i>			<i>Item #</i>	<i>Notes</i>
			6i.24	
21.	Annual Emergency Response Drills	Confirm drill date	7a	Obtained copy of 10/26/11 exercise sign off.
22.	Odor Minimization Plan	Confirm reviewed in 2011	16	Obtained 12-22-11 email from PXP to County stating no modifications to the plan necessary.
23.	Breakdown Report per Pressure Monitoring and Venting System for Crude Oil Tanks	Confirm submittal date & corrective action for 6/24 incident  Confirm 2010 audit recommendations implemented	16f	6-24-11 breakdown: Obtained filed report, AQMD notification and corrective action report.  See Table T-2 for information on 2010 EQAP Audit recommendation implementation status.
24.	Odor Awareness Training	Check training log	16j, 16k, 16l	Obtained employee training log (one page) that shows three contractors with three separate companies and dates of training – 1/19/11 & 5/11/11.
25.	Accumulated Ground Movement Study	Check both submittals/confirm dates	19	Confirmed final submittal on 1/13/11.
26.	New Flare Permit	Obtain copy of permit (March 2011)	30	MRS has copy on file of SCAQMD permit to construct and temporary permit to operate, dated March 25, 2011 (permit actually issued on 3-24-11). SCAQMD is in the process of transferring all permits to construct issued since 1999 to permits to operate. Uncertain how long update process will take.  County Building Permits Issued: <ol style="list-style-type: none"> <li>1. 2-17-11: New foundation for flare knock-out vessel install.</li> <li>2. 9-29-11: Retaining wall re scrubber &amp; pump area.</li> <li>3. 10-31-11: New foundations to support flare. New muffler enclosure &amp; CMU block wall around flare structure.</li> <li>4. 1-10-12: Electrical installation for flare switch rack.</li> </ol>
27.	Dust Control Personnel Training	Check training log	34y	Obtained employee training log (one page) that shows three contractors with three separate companies and dates of training – 1/19/11 & 5/11/11.
28.	Ground Movement Survey	Confirm date of survey	37a	Obtained copy of 9-23-11 transmittal re survey. Obtained copy of 11-2-11 transmittal re addendum letter to the Fugro. Obtained copy of 3-1-12 transmittal re revised study final report.



<b>File Review</b>				
<i>Appendix A</i>			<i>Item #</i>	<i>Notes</i>
29.	Pre-Construction Biological Surveys	Confirm submitted to County	41b	Obtained 2011 Special Status Species Compliance Annual Report dated June 2012.
30.	Updated ERP for Biological Resources	Confirm how long updated approval lasts	42	Originally approved on 3-31-10 with expiration of 3-31-12; however, updated approval in January 2011.  On 5/25/12, PXP stated the expiration date indicates the time by which the plan has to be implemented. PXP confirmed this with the County.
31.	Cultural Resources Sensitivity Training	Check training log	43a	Obtained PXP Training Records Report that shows training date for one employee on 1/17/11.
32.	Landscaping, Visual Screening, Irrigation Plan	Check approval status of Phase II	44, 45	Phase II approved on 9-13-11 and completed on 6-12-12. Obtained copy of approval.
33.	Recycling Plan	Check training log	46e	Obtained PXP Training Records Report that shows training date for one employee on 1/17/11.
34.	Water Management Plan	Check status on approval	48	Obtained copy of plan revised in June 2011 and approved by County Public Works on 8-8-12. Obtained copy of recycled water analysis with revised date of 6-15-12. Plans are consistent with each other regarding water usage amounts.
35.	Unused/Abandoned Equipment Removal Plan (UAER Plan)	Check schedule for removal of out of service equipment	49, 50, 50a	All equipment has been removed. 5-26-09 submitted original plan. 2-9-11 approval. Obtained copies.
36.	SIMQAP	Check approval status	53	4-13-11 approval. Not posted on website, per John Peirson (sensitive information). Obtained copy of approval.
37.	Daily Inspections of Equipment and Safety Devices	Check logs, if available	54a 54b	Obtained copies of inspection sheets.
38.	Abandoned Well Testing	Check annual test records	60	Obtained copies of test reports dated 12-15-11 and 5-21-12.
39.	Equipment Service	Check log	67	Obtained copies of inspection sheets and work orders.

File Review				
Appendix A			Item #	Notes
	Log			
40.	Spill Prevention, Control and Countermeasure Plan (SPCCP)	Confirm January 2011 submittal	68	January 2011 submittal. Plan doesn't get approved, only inspected.
41.	Off-Road Diesel Construction Equipment Engines	Check copies of CARB certification	74	Obtained copies of 11-21-11 Tier 3 engine emissions data certification sheets.
42.	Noise & Vibration Monitoring	Check reports	80 116	See Table T-2 for information on 2010 EQAP Audit recommendation implementation status.
43.	New Tank Specifications	Check compliance docs	140	2 new water tanks: obtained construction worksheet sign-offs.
44.	Well and Production Reporting	Confirm filing on 1/30/12	144	Obtained 1-30-12 transmittal re 2011 well and production reporting.

Field Review				
Appendix A			Item #	Notes
1.	Signs	Confirm quiet mode signs posted at every drilling and re-drilling site	1c	Confirmed.
		Confirm post oil well identification signs posted	47	
		Confirm main entrance sign posted	8	
		Confirm perimeter identification signs posted	11, 11a, 12	
		Confirm speed limit signs posted (15 mph)	34a	
		Confirm no littering signs posted	35	
2.	Fencing	Confirm entire site fenced	109, 113	Confirmed.
3.	Air Monitoring stations	Check stations at drill/reworking site (2) & gas plant (4)	6c, 6d, 6i.3	Confirmed.
		Check settings	6h.3	
		Confirm wind sock installed	6i.1	

Field Review				
Appendix A			Item #	Notes
4.	Noise	Confirm compliance (floor & board pads only)	78, 80, 82, 90, 92, 94, 95, 116	Confirmation obtained during weekly site visits since drilling discontinued for remainder of year.
5.	Belt Guards	Confirm compliance	124	Confirmation obtained during weekly site visits since drilling discontinued for remainder of year.
6.	Single-Cellar Covers	Confirm compliance	111	Confirmation obtained during weekly site visits since drilling discontinued for remainder of year.
7.	Machinery Enclosures	Confirm compliance	129	Confirmation obtained during weekly site visits since drilling discontinued for remainder of year.
8.	Toilets and Wash Facilities	Confirm installed	106	Confirmation obtained during weekly site visits since drilling discontinued for remainder of year.
9.	Hazardous Materials Storage	Check location and labeling	9a	None at drill sites during weekly site visits.
10.	Odor Suppressant	Confirm use at biofarms (3)	16a	Confirmation obtained during weekly site visits.
		Confirm use at drill site	16b	
11.	Portable Flare	Confirm installed at drill site	16c, 73	Confirmation obtained during weekly site visits since drilling discontinued for remainder of year.
12.	Met Station	Visually check wind sensors	25d	Confirmed.
13.	Eroded Hillside (n. of Stocker near La Brea)	Confirm completed or if scheduled	40c	Erosion control plan for hillside to be implemented in 2012.
14.	SIMQAP	Spot check equipment	53	Spot checked: workover equipment, two pump units, and gas plant air monitor.
15.	Landscaping	Confirm compliance	34s, 44	Confirmed.
16.	Landscaping Phase II	Confirm compliance	45b	Confirmed.
17.	New Flare	Confirm installation	31	Confirmed.
18.	Leaking Stuffing Box	Confirm tightened and corrected	n/a	Confirmed re wells VIC 1 124 & VIC 1 11.
19.	New Water Tanks	Confirm installation complete	n/a	Confirmed.

Drill Rig with Noise pads around the boards and rig floor





Drill Rig showing pads on V-door area and pipe lifting



Drill Rig Blowout Prevention Device





Drill Site – Mud Shakers



Drill Site – Wind Sock in front of Noise Barriers





Gas Plant: Old Flare (now removed) and New Flare While Under Construction



Drill Site – Sound Wall





Air Monitor at a Drilling Site



Gate 2 Signs



Drill Site Signs





Met Station – Wind Sensor



Met Station – Data Logger



Biofarm Vickers



Biofarm Vickers - Culvert





Biofarm LAI South – Culvert



Biofarm LAI North – Odorant System



Tank Monitoring Pressure Sensor on Tank 2



Tank Vapor Vent on Tank 2





**Permanent Noise Monitoring Equipment –Northwest Location**



**Permanent (Northeast Location) and Portable Noise Monitoring Equipment**



Watering Truck





**Drill Site**



**Drill Site – Production Casing Rack**

**Drill Site – 100-Foot Noise Monitor**



New Water Tanks





Erosion Control



Hillside Landscaping on La Brea Avenue





Basin



FM O&G BALDWIN HILLS

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# 2012 EQAP AUDIT REPORT

**Marine Research Specialists**

**10/31/2013**



## 2012/2013 EQAP AUDIT REPORT

### SUMMARY

This report provides an overview of the 2012 Environmental Quality Assurance Program (EQAP) audit conducted by Marine Research Specialists (MRS) on September 18, 2013 at the Freeport-McMoRan Oil & Gas (FM O&G), formerly Plains Exploration and Production (PXP), offices in Los Angeles, California. An initial review of FM O&G's, then PXP, compliance matrix was conducted by MRS on April 3, 2013.

The audit consisted of both a comprehensive file review of reports, plans, and various documentation logs, as well as a field review of operations and maintenance procedures. Additionally, MRS assessed the implementation status of the previous year's recommendations.

The overall findings of the audit were positive, confirming FM O&G's compliance with the EQAP-related mitigation measures identified in the Baldwin Hills Community Standards District (CSD). In conducting the 2012 EQAP audit, the following two recommendations were developed for potential improvements that would ensure continued compliance with the EQAP-related provisions of the CSD.

### *Findings/Recommendations*

1. *Noise Making Equipment Service*: Update the equipment maintenance management program (Maximo<sup>®</sup>) to include the inspection and, if necessary, service of noise making equipment consistent with CSD provision 22.44.142E5d. The maintenance management program data shall serve as the equipment service log required by the subject requirement.
2. *Contractor/Sub-Contractor Training*: The FM O&G Training Records Report does not include a complete list of contractor/subcontractor training records. Compliance with the EQAP requires confirmation that all CSD training is being conducted. Include contractor/sub-contractor training records in the FM O&G Training Records Report or provide the records in a format that documents that the required training has been completed.

### BACKGROUND

FM O&G operates the Inglewood Oil Field in the Baldwin Hills Zoned District of Los Angeles County. Existing operations of the oil field include the extraction of oil and gas from subsurface reservoirs, removal of water from the crude oil, removal of impurities and gas liquids from the gas, and shipping of crude oil through pipelines to refineries located in Southern California.

On October 28, 2008, the Los Angeles County Board of Supervisors adopted the Baldwin Hills CSD to provide a means of implementing regulations, safeguards, and controls for activities related to drilling for and production of oil and gas within the oil field located in the Baldwin Hills area of Los Angeles County.

The Environmental Quality Assurance Program (EQAP) entails the preparation of an EQAP Program by FM O&G indicating how FM O&G intends to comply with all conditions of approval

and plans that are part of the CSD (prepared in February 2008, revised in August 2008, and approved on October 28, 2008), field-monitoring to enforce compliance with environmentally protective permit conditions, preparation of an annual EQAP Report by FM O&G; and finally, a follow up EQAP audit to document compliance and noncompliance items and provide recommendations as deemed appropriate.

On February 28, 2013, FM O&G (then PXP) submitted the 2012 Annual EQAP Report as required by the CSD.

On April 2, 2013, MRS conducted an initial review of the 2012 Annual EQAP Report. On September 18, 2013 MRS, along with representatives from FM O&G, conducted a comprehensive file and field audit of the 2012 Annual EQAP Report at FM O&G offices.

EQAP requirements comply with State law that mandates the adoption of a program for reporting or monitoring mitigation measures included as permit conditions for projects (Public Resources Code § 21081.6(a) and CEQA Guidelines §§ 15091(d) and 15097).

## CSD REQUIREMENT

CSD Section F.1 requires PXP to develop and implement the following:

*Environmental Quality Assurance Program (EQAP). The Operator shall comply with all provisions of an Environmental Quality Assurance Program (EQAP) that has been approved by the Director. The following provisions relate to the EQAP:*

- a. *EQAP Requirements. The EQAP shall provide a detailed description of the steps the Operator shall take to assure compliance with all provisions of the CSD, including but not limited to all of the monitoring programs called for by the CSD.*
- b. *Annual EQAP Reports. Within 60 days of the end of each calendar year, the Operator shall submit to the Director an annual EQAP report that reviews the Operator's compliance with the provisions of the EQAP over the previous year and addresses such other matters as may be requested by the Director. The Annual EQAP Report shall include the following:*
  - *A complete list and description of any and all instances where the provisions of the EQAP, or any of the monitoring programs referred to therein or in the CSD, were not fully and timely complied with, and an analysis to how compliance with such provisions can be improved over the coming year.*
  - *Results and analyses of all data collection efforts conducted by the Operator over the previous year pursuant to the provisions of the CSD.*
- c. *EQAP Updates. The EQAP shall be updated as necessary and submitted to the Director for approval along with the annual EQAP report. The EQAP updates shall be provided to the CAP and MACC for review and comment. Comments from the CAP and MACC, if timely received, shall be considered by the Director before making a decision to approve the same. The Director shall complete the review of EQAP updates as soon as practicable, and shall either approve the updated EQAP or provide the Operator with a list of specific items that must be included in the EQAP prior to approval. The Operator shall respond to any request for additional information within 30 days of receiving such request from the Director, unless extended by the Director.*

## AUDIT PARTICIPANTS

Table 1 identifies the individuals who participated in the 2012 EQAP Audit.

**Table 1 – Audit Participants**

NAME	POSITION	ORGANIZATION
Candace Salway	EH&S Manager	PXP
Pat Gorski	Senior EH&S Advisor	PXP
Laura Vlk	Senior EH&S Specialist	PXP
Luis Perez	Senior Project Manager	MRS
Greg Chittick	Senior Engineer	MRS
Dean Dusette	Senior Scientist	MRS

## 2011 RECOMMENDATIONS' STATUS

As a result of the 2011 EQAP Audit, MRS developed two recommendations for potential improvements that would ensure continued compliance with the EQAP-related provisions of the CSD. Table 2 provides the implementation status of those recommendations.

**Table 2 – 2011 Recommendations' Status**

RECOMMENDATION	STATUS
1. <b>Water Management Plan:</b> Provide an updated plan that identifies the projected water usage numbers. Confirm the same number is reflected in the Recycled Water Report and obtain approval.	<b>Implemented.</b>  An updated Water Management Plan was reviewed and approved by the County on September 13, 2012. The Recycled Water Report and Water Management Plan usage numbers are consistent.
2. <b>Ombudsperson:</b> Add PXP's time of response to written complaints log in order to provide documentation that PXP responds within 1 hour as specified in the CSD (section J.3)	<b>Implemented.</b>  PXP started documenting the response time in the 2012 2 <sup>nd</sup> quarterly report.

## SITE PHOTOS

Photos at the end of this report depict various components of the 2012 oil field operations. The photos were taken either during the EQAP audit field visit or during regular field visits throughout the year.

## SITE VISIT OBSERVATIONS

Some Observations during the year associated with the regular Site Visits are listed below:

1. PXP/FM O&G drilled or re-drilled 20 wells and abandoned 5 wells in 2012. Site visits documented that the drill sites throughout the year were consistently clean and organized. Incidents involving pooled fluids were addressed in a timely manner either by using a vacuum truck or clean up pads. CSD requirements for odorant in and around the drill hole and mud shakers to reduce potential drilling odors were implemented with the volume of odorant increased when requested. Additional CSD requirements for drilling sites noted during site inspections included the portable flare, gas buster, wind socks, sound walls and blankets, and alarm lights. Site safety protocols were active with safety briefings by the onsite safety officer prior to each visit and access to real-time data in the Site Superintendent's trailer was available when requested.
2. On February 25, 2012, a release of 90 barrels of produced water from a corroded six inch trunk pipeline flowed across the facility and into a stormwater basin. Several barrels flowed off site and onto Stocker Street before returning back on site through the storm water drain system where it was contained in the storm water basin. The corroded pipeline was connected to a shut in well and was removed from service. All required agency notifications were completed by PXP/FM O&G staff.
3. Air monitors were installed and operational at each drill site throughout the year recording THC and H<sub>2</sub>S levels; THC was monitored at four locations on the perimeter of the Gas Plant. None of the monitoring instrumentation recorded an exceedance in 2012. Recalibrations were completed when requested and daily bump test documentation was provided upon request by the Site Superintendent. Horn and light alarm repairs were completed when needed.
4. Inglewood Oilfield perimeter signs and drill site signs are installed in accordance with the approved Signage Plan.
5. The Meteorological Station operated during 2012 with a greater than 99% valid data capture rate with most of the invalid data recorded following a power outage. The station sensors did not require any maintenance or repairs in 2012; the instruments were replaced during a scheduled calibration/audit by the sensor vendor, Met One, in November 2012. Data review included in the 2012 Annual Audit and Data Validation Report indicates the data collected is consistent with the nearby SCAQMD site located at Los Angeles International Airport.
6. Soil remediation at all three bioremediation farms (Vickers, LAI South & LAI North) was active through October 2012. Odor suppressants were used during material loading and tilling at each site. Site inspection visits documented that culverts were cleared and free of debris and the berms surrounding the farms were installed and maintained as required. On October 16, 2012 during a site inspection by the SCAQMD, soil VOC levels were recorded in excess of 50 ppm resulting in a Notice of Violation (NOV) by SCAQMD. The NOV requires PXP/FM O&G to meet the requirements of SCAQMD Rule 1166, resolve past inspection issues and coordinate restarting the bioremediation farms with District staff. Operation of the bioremediation farms ceased on October 19<sup>th</sup> when the NOV was issued. No additional soil remediation activities occurred in 2012 due to the installation of the modifications and upgrades required by the SCAQMD.

7. Review of the Oil Tank Pressure Monitoring Reports for 2012 showed there were no tank vapor pressure incidents that caused a tank to vent to atmosphere. One breakdown report was filed for the Inglewood #4 Wash Tank (D39); the issue was determined to be a failed level controller unit. The controller unit was replaced and the tank did not vent to the atmosphere.
8. The accelerometer seismic station, originally installed on 5/20/09, was operational with collected data transmitted by cell link to the CalTech Seismological Laboratory. On July 25, 2012, a 3.7 magnitude earthquake occurred with the epicenter in the Marina Del Rey/Playa del Rey/Westchester area, however, the seismic event did not exceed the 13 percent of gravity criteria that would have required operations to cease.
9. Requirements of the Quiet Mode Drilling Plan (QMDP) were observed during a night time site inspection on January, 25, 2012 at Drill Site VRU 264 RD1. QMDP requirements noted during the inspection included; odorant and odorant misters, air monitors, sound walls and blankets, rubber matting on the catwalk, rubber matting on the V-door, 100 foot noise monitor, and the use of walkie-talkies for communication between the main drill site and the mud storage area. Noise monitoring results from portable meter readings taken from areas throughout the drill site area were within acceptable limits.
10. Installation of the new gas plant flare was completed in 2012.
11. Annual spill response training in compliance with CSD E.1.b. was completed on 2/1/12.
12. Annual Emergency Response Plan (ERP) drills with the Culver City and LA County Fire Departments in compliance with CSD F.4 were completed on 11/7/12.
13. The Community Alert Notification system was tested on 12/19/12.

## FIELD AUDIT/COMPLIANCE STATUS

The PXP/FM O&G 2012 Annual EQAP Report was reviewed by MRS staff on April 3, 2012. The results of that review are included in the two tables following the Conclusion section of this report. The tables were generated to document review of the Annual EQAP Report and guide the file and field audit conducted at the FM O&G facility on September 18, 2013. The table column titled “Notes” completes the findings of the file and field review of the onsite audit.

## RECOMMENDATIONS

1. *Noise Making Equipment Service*: Update the equipment maintenance management program (Maximo<sup>®</sup>) to include the inspection and, if necessary, service of noise making equipment consistent with CSD provision 22.44.142E5d. The maintenance management program data shall serve as the equipment service log required by the subject requirement.
2. *Contractor/Sub-Contractor Training*: The FM O&G Training Records Report does not include a complete list of contractor/subcontractor training records. Compliance with the EQAP requires confirmation that all CSD training is being conducted. Include contractor/sub-contractor training records in the FM O&G Training Records Report or

provide the records in a format that documents that the required training has been completed.

**CONCLUSION**

The overall findings of the audit were positive, confirming PXP's compliance with the EQAP-related mitigation measures identified in the Baldwin Hills CSD.

<b>File Review</b>				
<i>Plans, Reports and Approvals (page 4)</i>			<i>Item #</i>	<i>Notes</i>
1.	Odor Complaints	Verify number of complaints – 25; only counted 24 in complaints logs  Verify number of complaints determined to be due to oil field – 2; log could attribute four (Ref #s: 0512, 2212, 2512 & 3712)	n/a	Correct count verified at audit as 24. Audit review of referenced complaints: 0512 – Due to landscaping crew application of pesticide Roundup. 2212 – Cause of odor traced to Gas Co. blow-down of gas line. 2512 – Cause of odor unknown, wind direction confirmed to be from oil field towards complaint location. 3712 - Cause determined to be work over equipment.
2.	Noise Complaints	Verify number of complaints – 11; only counted 10 in complaints logs	n/a	Correct count verified at audit as 10.
3.	2013 DRWAP	Amendment approval (1/14/13) not shown in table on page 4; however, signed approval provided in Appendix B	n/a	The 2013 DRWAP approval date verified at audit as 1/14/13.
4.	Annual Hazardous Materials Plan	Check plan/confirm submittal date to Fire Department	9	Confirmed at audit as submitted 12/17/13.
5.	Annual Emergency Response & Spill Response Training	Confirm training	13	Obtained copy of Spill Response Containment Training attendance list, dated 2/1/12.
6.	2 <sup>nd</sup> Annual Ground Movement Survey (PSOMAS)  Annual Geotech Report (Fugro)  Geotechnical Investigations for Property Damage Claims	Obtain and confirm submittal dates	29a	Reports reviewed at audit; investigation reports were sent to each subject homeowner.
7.	CAN System Annual Testing	Confirm test date	18	12-19-12 test date confirmed. Obtained copy of test notification (job statistics).

<b>File Review</b>				
<b>4.2 Data Analyses Results (page5)</b>			<b>Item #</b>	<b>Notes</b>
8.	Meteorological Station	Check annual data validation report/identify annual submittal month	21j	Data validation report reviewed at audit, submittal date confirmed as 4/12/13. Sensors replaced by vendor Met One Instruments in November 2012.
9.	Storage Tank Pressure Monitoring	Obtain date for reported breakdown and associated report (see #25 below)	14f	Breakdown report reviewed at audit, problem traced to failed tank level controller unit; level controller unit replaced.
<b>File Review</b>				
<b>Appendix A</b>			<b>Item #</b>	<b>Notes</b>
11.	Ombudsperson	Check inquiry log and response timing	1a 1o 1p 14o 14s 48	Reviewed all four quarterly logs.  PXP began implementing 2011 recommendation in 2 <sup>nd</sup> quarter of 2012.
12.	Quiet Mode Drilling Plan Annual Review	Confirm review	1	Obtained 12/18/12 email from PXP to County confirming plan review and no need for modifications.
13.	Quiet Mode Drilling Procedures Training	Check training log	1c	Obtained PXP Training Records Report that shows training dates for several employees: 1/9/12, 8/2/12, 8/15/12, 9/12/12, 9/20/12 & 9/24/12.  Reviewed Training Records Report at audit, contractors training documentation incomplete. See 2012 Audit Report Finding/Recommendation #2.
14.	Quiet Mode Drilling Implementation – Materials/Equipment	Confirm implementation; observe quiet mode drilling implementation during evening site visit	1d 1e 1h	Night inspection to observe QMDP implementation completed on January 25, 2012.
15.	Equipment Maintenance	Check annual log; obtain copy of Ensign annual rig service log	1f	Reviewed equipment maintenance management program (Maximo <sup>®</sup> ) at audit including Ensign 516 maintenance records in the field at drilling site well TVIC-VRU 4214. Documentation of maintenance for noise generating equipment was discussed; see 2012 Audit Report Finding/Recommendation #1.
16.	Quiet Mode Drilling Plan Enforcement	Check acoustics engineering firm's noise monitoring report	1n	Obtained copy of Behrens and Associates' 24-hour report for 1-2-13 to 1-3-13 for LAI1-4573 well.



File Review				
17.	DOGGR Permitting	Check NOI approvals	2e	Multiple DOGGR approvals were reviewed at the audit.
18.	Site Plan Review	Check approvals Inspect and retain copy of site plan	2f	Site plans were reviewed at the audit with County approval stamps confirmed.
19.	Well Pad Construction Permitting	Check Site Specific Grading Permit(s) or confirm approval of Master Grading Plan showing required information	2h	Site specific permit not needed since Master Grading Plan shows required information, none over 5,000 cubic yards. Grading plan maps reviewed at the audit, County approval stamps confirmed.
20.	Gas Sensors (air monitoring)	Check log from three dates	5d	Reviewed log from VIC-178 at audit and checked calibration record for 11/16/13. Calibration record documented all mobile and gas plant detectors calibrated correctly.
		Check Daily Checklist – Reworking Rig	5e	
		Check 5-year data storage	5g,11j	
		Check (re)calibration documentation; retain copy of calibration and testing report Obtain copy of gas plant report	6e	Obtained PXP Training Records Report that shows training dates for several employees: 1/9/12, 8/2/12, 8/15/12, 9/12/12 & 9/20/12. Reviewed Training Records Report at audit, contractors training documentation incomplete. See 2012 Audit Report Finding/Recommendation #2.
		Check personnel training log	6j	
21.	Met Station	Check training log	19a	Reviewed training log and annual report at audit. Reviewed calibration documentation, sensors replaced November 2012.
		Check monthly analyses & annual report	20b, 21j	
		Check sensor log from three dates	20d	
		Check (re)calibration documentation	21e	Reviewed calibration documentation, sensors replaced November 2012. All sensors passed annual calibration.
		Check 10-year data storage	21i	n/a
22.	Alarm Reports	Obtain quarterly report	5g.9, 5g.10, 6x	Alarm reports reviewed at audit, completed quarterly.
23.	Annual Emergency Response Drills	Confirm drill date	7	Obtained 12/17/12 email from PXP to County confirming drill date with attachment containing attendee sign in sheet. OSPR sign off date confirmed at audit as 12/4/12.
		Obtain copy of exercise sign off		
24.	Odor Minimization Plan	Confirm reviewed in 2012	14	Obtained 12-18-12 email from PXP to County stating no modifications to the plan necessary.

File Review				
25.	Breakdown Report per Pressure Monitoring and Venting System for Crude Oil Tanks	Confirm submittal date & corrective action (none) for one 2012 incident; obtain breakdown report	14f	Breakdown report reviewed at audit, problem traced to failed tank level controller unit; level controller unit replaced.
26.	Odor Awareness Training	Check training log	14j, 14k, 14l	Obtained PXP Training Records Report that shows training dates for several employees: 1/9/12, 8/2/12, 8/15/12, 9/12/12, 9/20/12 & 9/24/12.  Need contractors training list. Reviewed Training Records Report at audit, contractors training documentation incomplete. See 2012 Audit Report Finding/Recommendation #2.
27.	New Flare Operational	Confirm operational	24	MRS observed emergency flare noise test on 7/26/12.
28.	Dust Control Personnel Training	Check training log	26y	Obtained PXP Training Records Report that shows training dates for several employees: 1/9/12, 8/2/12, 8/15/12, 9/12/12, 9/20/12 & 9/24/12.  Need contractors training list. Reviewed Training Records Report at audit, contractors training documentation incomplete. See 2012 Audit Report Finding/Recommendation #2.
29.	Erosion Control Plan Review	Confirm plan reviewed (required every 2 years) and obtain modifications, if any – approved by County on 5/27/10	32a	Reviewed 4/30/12 with no changes recommended.
30.	Pre-Construction Biological Surveys	Confirm submitted to county  Obtain annual Special Status Species Compliance report	33b (page 16)	Reviewed Special Species Status Compliance report. Pre-construction surveys completed as required.
31.	Updated ERP for Biological Resources	Confirm implemented	n/a (42 in 2011 matrix)	Originally approved on 3-31-10 with expiration of 3-31-12; however, updated approval in January 2011.  On 5/25/12, PXP stated the expiration date indicates the time by which the plan has to be implemented. PXP confirmed this with the County.

File Review				
32.	Cultural Resources Sensitivity Training	Check training log	33a (page 19)	Obtained PXP Training Records Report that shows training dates for several employees. Reviewed Training Records Report at audit, contractors training documentation incomplete. See 2012 Audit Report Finding/Recommendation #2.
33.	Landscaping, Visual Screening, Irrigation Plan	Obtain copy of Phase III approval	34	Phase III submitted on 5/15/12 and approved on 2/20/13.
34.	Recycling Plan	Check training log	35e	
35.	Water Management Plan	Check status on approval	48	Obtained copy of plan revised in June 2011 and approved by the County on 9/13/12.
36.	Unused/Abandoned Equipment Removal Plan (UAER Plan)	Check schedule for removal of out of service equipment	38, 38a, 38b	Obtained copy of December 2012 update.
37.	Daily Inspections of Equipment and Safety Devices	Check logs and obtain copies of inspection sheets	42a 42b	Inspections of equipment and safety devices logged in equipment maintenance management program (Maximo®); spot check of data reviewed at audit.
38.	Abandoned Well Testing	Check annual test records	45	Obtained copies of test report dated 5-21-12.
39.	Equipment Service Log	Check log and obtain copies of inspection sheets and work orders	50	Equipment service log part of equipment maintenance management program (Maximo®); spot check of data including PSV's reviewed at audit.
40.	Spill Prevention, Control and Countermeasure Plan (SPCCP)	Confirm revisions, if any	51	Obtained copy of November 2012 revision (January 2011 original). Plan doesn't get approved, only inspected. Revision date of November 2012 confirmed at audit.
41.	Off-Road Diesel Construction Equipment Engines	Check copies of CARB certification	57	Certifications checked at audit, current equipment using Interim Tier IV engines.
42.	Noise & Vibration Monitoring	Check reports	n/a (80 & 116 in 2011 matrix)	No request by County for additional monitoring in 2012 or for review of Behrens & Associates monitoring by independent consultant (Steve Rogers).

File Review				
43.	New Tank Specifications	Check compliance docs, if any	107	Compliance determined by quantity and location requirements. The tanks themselves do not require a permit; however, CSD requirements are confirmed during building & safety, public works, and third party consultant (MRS) review.
44.	Well and Production Reporting	Confirm filing for 2012 reporting	111	Obtained 1-30-12 transmittal re 2011 well and production reporting; stop review of 2012 reporting completed at audit.

Field Review				
<i>Appendix A</i>			<i>Item #</i>	<i>Notes</i>
1.	Signs	Confirm quiet mode signs posted at every drilling and redrilling site	1c	Confirmation obtained during site visits.
		Confirm post oil well identification signs posted	36	
		Confirm main entrance sign posted	8	
		Confirm perimeter identification signs posted	11, 11a, 12	
		Confirm speed limit signs posted (15 mph)	26a	
		Confirm no littering signs posted	27	
2.	Fencing	Confirm entire site fenced	76, 80	Confirmation obtained during site visits.
3.	Air Monitoring stations	Check stations at drill/reworking site (2) & gas plant (4)	5b, 5c, 6c	Confirmation obtained during site visits.
		Check settings	5g.2	
		Confirm wind sock installed	6a	
4.	Noise	Confirm compliance (floor & board pads only)	60, 61, 63	Confirmation obtained during site visits.
5.	Belt Guards	Confirm compliance	91	Confirmation obtained during site visits.
6.	Single-Cellar Covers	Confirm compliance	78	Confirmation obtained during site visits.
7.	Machinery Enclosures	Confirm compliance	96	Confirmation obtained during site visits.
8.	Toilets and Wash Facilities	Confirm installed	73	Confirmation obtained during site visits.
9.	Hazardous Materials Storage	Check location and labeling	9a	None at drill sites during site visits.

<b>Field Review</b>				
<i>Appendix A</i>			<i>Item #</i>	<i>Notes</i>
10.	Odor Suppressant	Confirm use at biofarms (3)	14a	Confirmation obtained during site visits.
		Confirm use at drill site	14b	
11.	Portable Flare	Confirm installed at drill site	14c, 56	Confirmation obtained during site visits.
12.	Met Station	Visually check wind sensors	20c	Confirmation obtained during site visits.
13.	Eroded Hillside (n. of Stocker near La Brea)	Confirm completed	32c	Site visited during audit; future grading and well abandonment plans were discussed.
14.	SIMQAP	Spot check equipment	41	Equipment maintenance records reviewed during audit file review.
15.	Landscaping	Confirm compliance	26s, 34	Compliance, schedules, and future plan submittal discussed during audit file review. Landscaping progress reviewed during site visits.
16.	Vickers II Lower Basin	Check for odor	n/a	Vickers II Lower Basin has been empty during recent site visits.
17.	Biofarm Soil Removal	Confirm completed	n/a	Biofarm basins are empty for repairs and upgrades.

Drill rig with noise abatement pads





Drill Site – Mud Shakers with Odorant



Gas Plant: New Flare





Drill Site – Sound Wall



Air Monitor at a Drilling Site





Drill Site Signs



Drill Site Night Operations



Watering Truck





Basin



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CSD Section/ Plan	CSD Language	Compliance Description
E.1.a	Community Alert Notification System ("CAN"). The operator shall maintain and test on an annual basis a CAN for automatic notification of area residences and businesses in the event of an emergency arising at the oil field that could require residents or inhabitants to take shelter, evacuate, or take other protective actions.	The CAN is maintained and was tested on 12/18/13.
E.1.b	Spill Containment Response Training. The operator shall conduct annual spill containment response training and shall at all times have available, on-site, sufficient and properly maintained equipment and/or facilities so that a spill of the entire contents from the largest oil tank on the oil field can be responded to and contained in a timely manner to reduce the likelihood that the spill reaches a catch basin.	The annual spill containment response training occurred on 02/12/13 and FM O&G has, at all times have available, on-site, sufficient and properly maintained equipment and/or facilities so that a spill of the entire contents from the largest oil tank on the oil field can be responded to and contained in a timely manner to reduce the likelihood that the spill reaches a catch basin.
E.1.c	Emergency Response Plan ("ERP"). The operator shall at all times maintain and fully implement and comply with all provisions of an emergency response plan and shall further ensure that the then current ERP satisfies all rules and regulations of the United States Environmental Protection Agency and California Code of Regulations relating to emergency action plans and spill prevention control and countermeasure plans, as well as the rules, regulations, and requirements of the California Office of Spill Prevention and Response. The ERP shall also satisfy the rules and regulations of the United States Department of Transportation relating to onshore pipeline spills.	FM O&G maintains, fully implements and complies with an ERP that is in compliance with all applicable rules and regulations of agencies with oversight of the ERP.
E.2.c	Odor Minimization. At all times the operator shall comply with the provisions of an odor minimization plan that has been approved by the director. The odor minimization plan shall include any measures requested by the director. The plan shall provide detailed information about the facility and shall address all issues relating to odors from oil operations. Matters addressed within the plan shall include setbacks, signs with contact information, logs of odor complaints, method of controlling odors such as flaring and odor suppressants, and the protocol for handling odor complaints. The odor minimization plan shall be reviewed by the operator on an annual basis to determine if modifications to the plan are required. Any modifications to the odor minimization plan shall be submitted to the director for review and approval.	The Odor Minimization Plan was reviewed by FM O&G in 2013 and it was determined that no modifications are required. DRP was notified of this determination on 12/20/13.
E.2.j	Meteorological Station. The operator shall maintain and operate a meteorological station at the oil field in good operating condition and in compliance with all applicable Environmental Protection Agency ("EPA") and SCAQMD rules, regulations, and guidelines, and to the satisfaction of the director. The operator shall conduct an audit of the meteorological station on an annual basis and submit the results of the audit to the SCAQMD and the director. The operator shall maintain the data files for the meteorological station for a period of not less than 10 years. All such data shall be available upon request to the SCAQMD and the director.	FM O&G maintains and operates a meteorological station at the field in compliance with this policy. The 2012 annual audit of the station was submitted to the County on 04/02/13 and the 2013 annual audit will be submitted in the Spring of 2013.
E.4.a.ii	Grading involving up to 5,000 cubic yards and grading associated with the bioremediation farms may be undertaken pursuant to a county master grading plan stamped by a registered professional engineer and a California certified engineering geologist and approved by the director of public works.	FM O&G conducts all grading in accordance with the approved Master Grading Plan as approved by the LA County Department of Public Works (DPW). The 2013 Master Grading Plan was submitted to DPW on November 14, 2013.
E.4.b.ii	A site-specific geotechnical investigation shall be completed for all proposed permanent structures. The investigation shall include analysis and recommendations associated with potential seismically induced ground failure, such as differential settlement and lateral spreading. The geotechnical investigation shall be completed by a California-certified engineering geologist and submitted to the director of public works for review and approval.	Geotechnical investigations have been completed for the installation of permanent structures at the IOF and are submitted to the County with applications to the Department of Regional Planning (DRP) and Building & Safety. Examples of permanent structures requiring this analysis include a 5,000 barrel tank at the Packard Tank Setting, a foundation for an injection pump at the water plant, the installation of two, new water tanks, and a new UltraFab unit at the gas plant.

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E.4.c	<p>Ground Movement Surveys. The operator shall conduct ground movement surveys once every 12 months, or more frequently if determined necessary by the director of public works, following all provisions of a ground movement monitoring plan that is acceptable to DOGGR and the director of public works, that calls for both vertical and horizontal ground movement surveys, at specified survey locations within, and in the vicinity of, the oil field, utilizing high precision Global Positioning System technology, in combination with a network of ground stations (or any alternative technology specified in the ground movement monitoring plan approved by the director of public works), and following other survey methods outlined in the plan. The surveys shall be conducted by a California-licensed surveyor. The survey results shall be analyzed in relation to oil field activities, such as production, steam injection, and waterflooding, taking into consideration individual oil producing zones, injection schedules, rates, volume, and pressure. The analysis shall be completed in collaboration by a California-registered professional petroleum engineer, registered geotechnical engineer, and certified engineering geologist. The results of the annual monitoring survey and analysis shall be forwarded to DOGGR and the director of public works. If requested by DOGGR or the director of public works, the operator shall make modifications to the ground movement monitoring plan. In the event that survey indicates that on-going ground movement, equal to or greater than 0.6 inches at any given location, or a lesser value determined by the director of public works is occurring in an upward or downward direction in the vicinity of or in the oil field, the operator shall review and analyze all claims or complaints of subsidence damage that have been submitted to the operator or the county by the public or a public entity in the 12 months since the last ground movement survey. Based thereon, the operator shall prepare a report that assesses whether any of the alleged subsidence damage was caused by oil operations and submit said report to DOGGR and the department of public works. The department of public works shall review the report to determine if it concurs with its conclusions. If the report concludes that damage has not been caused by oil operations, and the department of public works does not concur in that conclusion, it shall forward its conclusions to DOGGR for its review and possible action. If the report concludes that damage was caused by oil operations and the department of public works concurs with any such conclusion, the department of public works shall forward the department of public works' conclusions to DOGGR and ask DOGGR to evaluate the operator's fluid injection and withdrawal rates to determine whether adjustments to these rates may alleviate the ground movement, and if so, where in the oil field such adjustments should be made. The operator shall implement whatever adjustments in the rates of fluid injection and/or withdrawal that DOGGR determines are necessary and appropriate to alleviate any ground movement damage. The county shall promptly notify the CAP of any such action that is taken pursuant to this subsection. Injection pressures associated with secondary recovery operations (i.e., water flooding) or disposal of produced fluids shall not exceed reservoir fracture pressures as specified in Title 14 of the California Code of Regulations, section 1724.10, and as approved by the DOGGR.</p>	<p>Ground movement surveys have been completed annually as required by the approved, Accumulated Ground Movement Plan. The 2012 annual survey was submitted in July 2012 and revised in October 2012 and September 2013 to the DOGGR and DPW. The 2013 annual survey is scheduled to be submitted in the summer of 2014.</p>
E.4.i	<p>Paleontological Monitor. The operator shall have a qualified paleontologist, approved by the director, monitor all rough grading and other significant ground disturbing activities in paleontological sensitive sediments. The sensitive sediments that have been identified within the oil field include the Lower to Middle Pleistocene San Pedro Formation and the Middle to Upper Pleistocene Lakewood Formation. A paleontologist will not be required on site if excavation is only occurring in artificial fill or Holocene alluvium.</p>	<p>In 2013, paleontological surveys were conducted by Card no ENTRIX at four well pads. Card no ENTRIX staff did not observe any items of potential paleontological interest at any of the four sites.</p>
E.5.c	<p>Quiet Mode Drilling Plan. All drilling and re-drilling on the oil field between the hours of 6:00 p.m. and 8:00 a.m. shall be conducted in conformity with a quiet mode drilling plan that has been approved by the director and the director of public health. The quiet mode drilling plan shall be reviewed by the operator every year to determine if modifications to the plan are required. The operator shall make changes to the plan if requested by the director or the director of public health. Any modifications to the quiet mode drilling plan shall be submitted to the director and the director of public health for review and approval. The quiet mode drilling plan shall include any measures requested by the director or the director of public health.</p>	<p>FM O&amp;G reviewed the Quiet Mode Drilling Plan concluded that there are no modifications necessary to the plan in 2013. Notice of this annual review was sent to DRP on 12/20/13.</p>
E.5.j QMDP 2.0.A	<p>Worker Notification. The operator shall instruct employees and subcontractors about the noise provisions of this subsection E.5 prior to commencement of each and every drilling, re-drilling, reworking, and construction operation, and shall annually certify to the director that such employees and subcontractors have been properly trained to comply with such noise provisions. The operator shall prominently post quiet mode policies at every drilling and re-drilling site.</p>	<p>Employees and contractors were trained on the Quiet Mode Drilling Plan in 2013 and training records were provided to the DRP on 3/3/14.</p>



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E.7.d, f	<p>d) Pre-Construction Surveys. The following surveys shall be conducted prior to any significant vegetation removal in sensitive natural habitat as identified in the special status species and habitat protection plan.</p> <p>f) Construction Monitoring. If the pre-construction surveys find sensitive plant, wildlife species, or nesting birds, a biological monitor hired by the operator, and approved by the County, shall be on site during construction to monitor the construction activities.</p>	<p>All required pre-construction surveys and construction monitoring were completed in 2013 and will be documented in the 2013 Special Status Species and Habitat Protection Plan annual report (report) scheduled for submittal in the Spring of 2014. The 2012 report was submitted to DRP on 07/30/13.</p>
E.8.b CTT 4.0	<p>Archeological Training. The operator shall provide archeological training for all construction personnel who will be involved with ground disturbance activities at the oil field. All such construction personnel shall be required to participate in the training and will receive training material prepared by a qualified archaeologist prior to working on ground disturbance activities.</p> <p>FM O&amp;G staff and workers that will be involved in the excavation activities at the site will be required to attend cultural resources sensitivity training in accordance with Conditions E.8.b.and L.7.a. of the CSD. The objectives of the training are to increase awareness and accountability concerning the importance of PXP's cultural resource-related legal and trust responsibilities; to educate staff regarding the procedures to be implemented if inadvertent cultural resources are encountered during construction activities; and preserve and protect historic and prehistoric objects related to human activities.</p>	<p>All construction personnel involved with ground disturbance activities were provided archeological training in 2013 to comply with both this policy and the Construction Treatment Plan. Training records were submitted to the DRP on 3/3/14.</p>
E.8.c	<p>Construction Treatment Plan. The operator shall comply with all provisions of a construction treatment plan, approved by the director, to ensure that any new archeological discoveries are adequately recorded, evaluated, and, if significant, mitigated. In the event that unknown archeological artifacts are encountered during grading, clearing, grubbing, and/or other construction activities, work shall be stopped immediately in the vicinity of the find and the resource shall be evaluated by a qualified archaeologist, approved by the director. The construction treatment plan shall include any measures requested by the director.</p>	<p>No archeological artifacts were uncovered in 2013. The required training was completed, and proof of compliance was submitted to DRP on 03/03/14.</p>
E.10	<p>Landscaping, Visual Screening, Irrigation and Maintenance. The operator shall comply with the conceptual landscaping plan for the oil field prepared by Mia Lehrer &amp; Associates, dated October 2008, on file at the department of regional planning, which is intended to beautify and screen the oil field from adjoining residential, recreational, and institutional areas or adjacent public streets or highways. Landscaping required by this plan shall be completed in phases over a two-to five-year period as approved by the director. All landscaping on the oil field shall be routinely inspected (on at least a monthly basis) and maintained in a neat, clean, and healthful condition, including proper watering, pruning, weeding, fertilizing, and replacement of plants as needed. Litter shall also be removed on a regular basis.</p>	<p>Landscaping for Phases 1 (Windsor Hills/La Brea) and 2 (Lad era Crest looking north) have been completed and are routinely inspected by both FM O&amp;G staff and the County ECC. Phases 3 (Lad era Crest looking east), 4 and 5 (La Cienega) have been approved by the County. Phase 6 (Fairfax Avenue) and Phase 7 (Stocker Street) have been prepared in draft form and are posted at <a href="http://www.inglewoodoilfield.com">www.inglewoodoilfield.com</a> for CAP review.</p>
E.13	<p>Signs. All signage shall comply with Part 10 of Chapter 22.52 of Title 22. In addition, the operator shall comply with the following provisions:</p> <p>a. Perimeter Identification Signs. Identification signs, at intervals acceptable to the director, shall be posted and maintained in good condition along the outer boundary line fence and along the fences adjoining the public roads that pass through the oil field. Each sign shall prominently display current and reliable emergency contact information that will enable a person to promptly reach, at all times, a representative of the operator who will have the expertise to assess any potential problem and recommend a corrective course of action. Each sign shall also have the telephone number of the county department of regional planning zoning enforcement section and the number of SCAOMD that can be called if odors are detected.</p> <p>b. Main Entrance Sign. A sign shall be posted and maintained in good condition at the main entrance of the oil field prominently displaying a telephone number by which persons may contact a representative of the operator at all times to register complaints regarding oil field operations.</p> <p>c. Other Required Signs. All identification signs, warning signs, no trespassing signs, and other signs required by county, state and federal regulations shall be properly posted and maintained in all required locations and in good condition.</p> <p>d. Well Identification Signs. Well identification signs including the well name and well number shall be posted and maintained in good condition at each well location.</p>	<p>The installation of the signage required by this provision was completed upon approval of the Signage Plan dated January 2009 (Revision1) and approved by the County on May 18, 2009. All required signage was updated to reflect to the name new Operator of the oil field, Freeport-McMoRan Oil &amp; Gas and to remove the name of the previous Operator, Plains Exploration &amp; Production Company (PXP).</p>

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E.17.a	Construction Storm Water Pollution Prevention Plan ("CWPPP"). The operator shall maintain and implement all provisions of a storm water pollution prevention plan ("SWPPP") that has been inspected by the Regional Water Quality Control Board and the county department of public works. The operator shall provide the director and the director of public works with a copy of the SWPPP, and any future modifications, revisions, or alterations thereof, or replacements therefore. The SWPPP shall be updated prior to new construction activities as required by the Regional Water Quality Control Board.	The DPW was provided with the most up-to-date copy of the RWQCB reviewed SWPPP on 11/26/13.
E.17.b	Spill Prevention, Control, and Countermeasure Plan ("SPCCP"). The Operator shall maintain and implement all provisions of a spill prevention, control, and countermeasure plan ("SPCCP") which meets the requirements of the Local California Unified Program Agency and the United States Environmental Protection Agency. The operator shall provide the director and the fire chief with a copy of the SPCCP and any future modifications, revisions, or alterations thereof, or replacements therefore.	FM O&G provided DRP and the Los Angeles County Fire Department (LACFD) a copy of the most up-to-date SPCC on 10/09/13.
E.19	Groundwater Monitoring. The operator shall develop, implement, and carry out a groundwater quality monitoring program for the oil field that is acceptable to the director and consistent with all requirements of the Regional Water Quality Control Board. Pursuant to the approved program, the operator shall install and maintain groundwater monitoring wells in the vicinity of each surface water retention basin, which is permitted by the Regional Water Quality Control Board. Such monitoring wells shall be completed to the base of the permeable, potentially water bearing, alluvium, Lakewood Formation, and San Pedro Formation, and to the top of the underlying, non-water bearing Pica Formation, as determined by a California-certified professional geologist. The Regional Water Quality Control Board and the director shall be regularly advised of the results of such monitoring and shall be immediately advised if such monitoring indicates a potential problem.	Quarterly groundwater monitoring reports were submitted to DRP and the Los Angeles Regional Water Quality Control Board (RWQCB) on the following dates: 04/05/13 07/11/13 10/09/13 01/16/14
E.21.a SA.12	Equipment Removal. All facilities that have reached the end of their useful economic life shall be properly decommissioned and removed from the oil field within one year. Areas not slated for future use shall be restored and revegetated within 90 days of termination of use, unless such restoration and revegetation would interfere with fire safety or access to oil operations. Clean-Up Plan. The CSD requires PXP to decommission and remove facilities that have reached the end of their useful economic life (County Code section 22.44.142.E.21.a) and submit to the County for its approval an unused or abandoned equipment removal plan (County Code section 22.44.142.L14). PXP has submitted such a plan in 2009 and shall periodically update the plan should additional equipment, not identified in PXP's original removal plan, become unused or abandoned. Equipment and materials not necessary to oil field operations as identified by the Director of Planning shall be promptly removed from view of Sensitive Developed Areas as addressed in the plan.	The equipment removal plan was updated and submitted to the DRP on 03/03/14.
E.25	Storage of Hazardous Materials. The operator shall comply with all provisions of a hazardous materials business plan that has been submitted to the fire chief. The operator shall deliver to the fire chief for review and approval an updated hazardous material business plan on an annual basis. This plan shall provide the location of where hazardous materials are stored at the oil field. Hazardous materials shall be stored in an organized and orderly manner and identified as may be necessary to aid in preventing accidents, and shall be reasonably protected from sources of external corrosion or damage to the satisfaction of the fire chief.	The annual Hazardous Materials Business Plan was submitted to the LA County Fire Chief on 12/11/13.
E.26.c	Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan. Before the end of each calendar year, the operator shall develop and deliver to the director an annual drilling, redrilling, well abandonment, and well pad restoration plan, which shall describe all drilling, redrilling, well abandonment, and well pad restoration activities that may be conducted during the upcoming calendar year. Drilling and redrilling shall be scheduled to avoid over concentration of such activities in that year in any one area if located near a developed area. The operator may at any time submit to the director proposed amendments to the then current annual plan. No drilling, redrilling, or abandonment activity may be commenced unless it is described in a current annual plan (or an amendment thereto) which has been approved by the director. The annual plan (and any amendments) shall be provided to the CAP for review and comment. All comments on the annual plan from the CAP shall be submitted to the director in writing, and, if timely submitted, will be considered as part of the director's review and approval. The director shall complete the review of the annual plan (and any amendments) within 45 days of receipt, and shall either approve the annual plan or provide the operator with a list of deficiencies. The annual plan shall comply with the provisions of this subsection, and shall include the following:	The 2014 Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan (Plan) was submitted to the County on 08/29/13 and was approved on 10/15/13. On 12/18/14, FM O&G submitted an amendment to the approved 2014 Plan to move the bottom hole a well and rename the well accordingly. This amendment was approved by DRP on 01/23/14.

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E.30	<p>Well and Production Reporting. The operator shall deliver annual production reports to the director and the fire chief. The reports shall provide the following information:</p> <ul style="list-style-type: none"> <li>a. A copy of all DOGGR Forms 110 and 110B submitted during the previous 12 months.</li> <li>b. Number and mapped location of wells drilled or redrilled, including well identification numbers.</li> <li>c. Number and mapped location of water injection wells, including well identification numbers.</li> <li>d. Number and mapped location of idled wells, including well identification numbers and the date each well was idled.</li> <li>e. Number and mapped location of abandoned wells, including date each well was abandoned and/or re-abandoned.</li> <li>f. Any additional information requested by the director or the fire chief.</li> </ul>	<p>The 2013 well and production reporting was submitted to the DRP and Fire Chief on 02/04/14.</p>
E.32	<p>Abandoned Well Testing. The operator shall conduct annual hydrocarbon vapor testing of areas within the oil field that contain abandoned wells. The testing shall be done using a soil gas vapor probe, or another method approved by the director. The results of the testing shall be submitted to the director and DOGGR on an annual basis. Abandoned wells that are found to be leaking hydrocarbons that could affect health and safety shall be reported to the director and DOGGR within 24 hours of the abandoned well test. If directed by DOGGR, the operator shall re-abandon the well in accordance with DOGGR rules and regulations. If the test results for an abandoned well area are at or below the background levels for two consecutive years that area shall thereafter be tested every five years.</p>	<p>The 2013 abandoned well testing was submitted to the DRP and DOGGR on 07/12/13.</p>
F.1.b	<p>Annual EQAP Reports. Within 60 days following the end of each calendar year, the operator shall submit to the director an annual EQAP report that reviews the operator's compliance with the provisions of the EQAP over the previous year and addresses such other matters as may be requested by the director.</p>	<p>This 2013 annual EQAP report was submitted on 3/3/14 in compliance with this policy.</p>
F.3.c	<p>Worker Notification. The operator shall ensure that all persons working on the oil field comply with all provisions of the currently approved SIMQAP.</p>	<p>All persons working on the oil field in 2013 received SIMQAP training. Training records were submitted to the DRP on 3/3/14.</p>
F.4	<p>Annual Emergency Response Drills of the County and Culver City Fire Departments. The operator shall demonstrate the effectiveness of the emergency response plan by responding to one planned emergency response drill per year which shall be conducted in conjunction with the county and Culver City fire departments. Emergency response drills required by other agencies that involve the county and Culver City fire departments can be used to satisfy this provision. In addition, the operator shall demonstrate the effectiveness of the emergency response plan by responding to not more than two unannounced drills each year which may be called by the county fire department at the oil field. If critical operations are then underway at the oil field, the operator need not respond to a unannounced drill to the extent such a response would, as a result of such critical operations, create an undue risk of personal injury or property damage, but in such case the operator must promptly explain the nature of the critical operations, why response is not possible, and when the critical operations will be completed.</p>	<p>The 2013 emergency response drill was conducted on November 6, 2013. Representatives from both LA County and Culver City Fire Departments attended as well as representatives from the California Department of Fish and Wildlife. Proof of training was sent to the DRP on 3/3/14.</p> <p>No unannounced drills occurred in 2013.</p>
F.7	<p>Complaints. All complaints related to oil operations received by the operator shall be reported on the same business day to the environmental compliance coordinator and to the director. In addition, the operator shall maintain a written log of all complaints and provide that log to the director, the MACC, and CAP on a quarterly basis. Depending upon the nature of the complaint, the operator shall report the complaint to the SCAQMD, DOGGR, and any other appropriate agencies with oversight authority regarding the complaint at issue. If the complaint is received after normal business hours, it shall be reported to the environmental compliance coordinator and the agencies at the opening of the next business day.</p>	<p>All complaints received were reported to the ECC, DRP as well as other appropriate agencies with oversight of the matter in compliance with the timing of this policy. Quarterly complaint logs were submitted to the ECC and the DRP quarterly and are posted at <a href="http://www.inglewoodoilfield.com">www.inglewoodoilfield.com</a>.</p>
G.5.b	<p>Change of Operator. The performance bond shall continue in force for one year following any sale, transfer, assignment, or other change of operator of the oil field, or of the current operator's termination of activities at the oil field. The county may release said bond prior to the end of the one-year period upon satisfaction by the operator of all its obligations. Notwithstanding the foregoing, the performance bond shall not be terminated or released upon the sale, transfer, assignment, or other change of operator until the new operator has delivered a replacement bond complying with the provisions of this subsection G.</p>	<p>Due to the 2013 change of operator from PXP to FM O&amp;G, a replacement bond complying with the provisions of subsection G was submitted to the DRP on 6/25/2013.</p>

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H.1	<p>Director's Review Required. The operator shall apply for and receive approval of a director's review pursuant to the provisions of Part 12 of Chapter 22.56 prior to any new drilling and redrilling. New drilling and redrilling approved through a director's review procedure shall be limited to no more than 53 wells per year, with the maximum number of newly drilled wells of that total, limited to 45 per year, except that during the first year following the effective date of the ordinance establishing this section, new drilling and redrilling shall be limited to no more than 24 wells. Approval through director's review for drilling new wells shall be limited to 600 wells over 20 years, beginning on the effective date of this ordinance. Drilling and redrilling shall be planned to avoid over concentration of such activities in one area in any one year, if near developed areas. The director's review procedures shall also apply to emergency actions determined by the director as necessary to prevent an imminent hazard, or to other immediate measures required for the purposes of protecting health and safety. No new permits for drilling or redrilling shall be approved by the director unless the subject wells have been approved as part of an annual drilling plan as described in subsection E.26.c. Approval shall not be granted until copies of all related permits have been submitted to the director; other permits include, but are not limited to, the permits required by DOGGR, the county fire department; the county department of public works, the county sanitation district, RWQCB, SCAQMD, and other pertinent agencies identified by the director.</p>	<p>All wells drilled or re-drilled in 2013 received DRP Site Plan approvals prior to drilling of the wells, which included proof of applicable permits from DOGGR and/or the LA County Fire Department. All wells were included in the 2013 Drilling Plan.</p>
J.2.a	<p>Community Meetings. The operator shall hold community meetings on an annual basis to provide updates on oil operations.</p>	<p>The 2013 annual meeting was held on 11/12/2013.</p>
J.2.b	<p>Newsletter. The Operator shall publish an informational newsletter annually, which shall contain updated information on oil operations including drilling, redrilling, maintenance, repair, and reworking activities and all recently granted conditional use permits or applications filed for conditional use permits for the oil field. The newsletter shall be mailed by the operator to all owners of property located within 1,000 feet of the outer boundary line; all owners of property within 1,000 feet of the perimeter of the district as shown in the records of the county assessor's office; to any person or entity who has filed a written request therefore with the director; and to neighboring cities. The operator shall also make these newsletters available on the oil field web site. The oil field web site address shall be publicized in each newsletter.</p>	<p>The 2013 newsletter was distributed 30-days prior to the 2013 annual meeting required in J.2.a.</p>
J.2.c	<p>Oil Field Web Site. The operator shall maintain and update on a regular basis an oil field web site that shall include information on oil operations at the oil field, including drilling and production activities. All monitoring and compliance reports and results, plans, audits and studies, and any other available documents that are required by this section (except to the extent they contain information that may not legally be disclosed) shall be promptly posted on the Oil Field Web Site in pdf format.</p>	<p>FM O&amp;G maintains the <a href="http://www.inglewoodoilfield.com">www.inglewoodoilfield.com</a> website, which includes information on the history and future of the oil field, oil field operations, operational plans, compliance plans, community and environmental sections, and information on the CSD. The web site contains over 100 documents related to operational and compliance information with the documentation posted in pdf format as required by this policy. The web site also provides contact information and includes an interactive email system to allow for direct input to FM O&amp;G and for registering for email updates on oil field activities.</p>
J.3	<p>Ombudsperson. The operator shall designate employees or authorized agents to serve as ombudspersons to respond to questions and concerns concerning the oil operations. Each ombudsperson shall be familiar with all the provisions of this section and all conditions of approval related to permits and approvals issued by the county or the State of California. It shall be the further responsibility of the ombudsperson to facilitate, to the extent feasible, the prompt resolution of any issues that may arise relating to the above-stated matters or the impacts of the oil operations. The name, title, email address, and telephone number of the ombudsperson shall be posted on the oil field web site, prominently displayed in the newsletter, distributed twice per year to the CAP and MACC, and provided to any other persons requesting such information. An ombudsperson shall be available at all times, and shall respond within one hour after an initial call. An ombudsperson shall also meet at reasonable times with interested parties in an attempt to resolve issues related to oil operations. An ombudsperson shall have authority to initiate a response on behalf of the operator in all foreseeable matters. The operator shall be required to maintain a written log of all calls to the ombudspersons registering complaints or concerns regarding oil operations or other matters. The log shall include the complainant's name, date, time, phone number, nature of complaint, and the response or resolution offered. A copy of the log shall be provided to the director, the MACC, and the CAP on a quarterly basis.</p>	<p>The ombudsperson system has been in place since the adoption of the CSD and serves as primary contact between FM O&amp;G and the community. The ombudsperson contact information is included in the annual newsletters and in the agendas for CAP meetings. In addition to the ombudsperson, the oil field maintains four staff members on an on-call basis to coordinate and respond to calls from the public or regulatory agencies regarding oil field operations. FM O&amp;G maintains a complaint log summarizing all calls made to the ombudsperson as required by this policy. The complaint log is provided to the Director, the MACC and the CAP quarterly.</p>

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AMP 6.2	To ensure that the Air Monitoring Plan requirements are adhered to during drilling, prior to every drilling, redrilling, or reworking project I program, PXP will conduct an employee and contractor CSD Awareness Training, which will include all applicable Air Monitoring Plan requirements and the importance of full compliance. The training will be given to the drill site supervisors, designated air monitoring personnel, gas plant operators and lead and operations foreman. The training will be conducted after the Air Monitoring Plan is approved by the County but prior to drilling. Refresher training will be conducted every year thereafter for all affected and responsible personnel. PXP's EH&S staff will schedule training events and will conduct internal inspections to make sure appropriate air monitoring requirements are met. Internal inspections will be conducted semiannually by the EH&S. Training and internal inspections will be documented.	Air Monitoring Plan annual refresher training was complete by all applicable personnel. Training records were sent to the DRP on 3/3/13.
OMP 4.2	To assure that the odor minimization measures are adhered to, FM O&G will conduct Awareness Training for employees and contractors involved in drilling operations and at the bioremediation farm. FM O&G employees will be trained on the contents of this plan. EH&S will keep records of the training. Annual refresher training will be conducted.	All applicable FM O&G employees and contractors were trained on the provisions of the Odor Minimization Plan as required by this policy in 2013. Training records were provided to the DRP on 3/3/14.
QMDP 2.0.A	All service company or other subcontractor personnel will be made aware of Quiet Mode operations. To ensure that the Quiet Mode measures are adhered to, prior to every drilling, redrilling or workover project, FM O&G will conduct an employee and contractor Awareness Training which will include all applicable Quiet Mode procedures and the importance of full compliance.	All Inglewood Oil Field contract personnel and employees working on drilling, redrilling and/or workover operations were trained in the provisions of the Quiet Mode Drilling Plan as required by this policy. Proof of training was sent to the DRP on 3/3/14.
FDCP 4.1	Prior to the construction of new facilities and drilling pad construction projects, FM O&G will conduct an employee and contractor Awareness Training which will include all applicable AQMD approved dust control measures and the importance of strict compliance. PXP's Environmental Health & Safety (EH&S) staff will document, record and maintain records of these training events and will conduct internal inspections to ensure that the appropriate dust control measures are being properly implemented.	All applicable Inglewood Oil Field employee and contractors were trained on the Fugitive Dust Control Plan in 2013. Training records were sent to the DRP on 3/3/14.

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E.1.a	Community Alert Notification System ("CAN"). The operator shall maintain and test on an annual basis a CAN for automatic notification of area residences and businesses in the event of an emergency arising at the oil field that could require residents or inhabitants to take shelter, evacuate, or take other protective actions.	The CAN is maintained and was tested on 12/22/14.
E.1.b	Spill Containment Response Training. The operator shall conduct annual spill containment response training and shall at all times have available, on-site, sufficient and properly maintained equipment and/or facilities so that a spill of the entire contents from the largest oil tank on the oil field can be responded to and contained in a timely manner to reduce the likelihood that the spill reaches a catch basin.	The annual spill containment response training occurred on 02/12/14.
E.1.c	Emergency Response Plan ("ERP"). The operator shall at all times maintain and fully implement and comply with all provisions of an emergency response plan and shall further ensure that the then current ERP satisfies all rules and regulations of the United States Environmental Protection agency and California Code of Regulations relating to emergency action plans and spill prevention control and countermeasure plans, as well as the rules, regulations, and requirements of the California Office of Spill Prevention and Response. The ERP shall also satisfy the rules and regulations of the United States Department of Transportation relating to onshore pipeline spills.	FM O&G maintains, fully implements and complies with an ERP that is in compliance with all applicable rules and regulations of agencies with oversight of the ERP.
E.2.a	Emission Offsets. The operator shall obtain emission offsets or RECLAIM credits as defined and required by SCAQMD Regulations for all new or modified emission sources that require a new or modified SCAQMD permit.	No credits were needed.
E.2.c	Odor Minimization. At all times the operator shall comply with the provisions of an odor minimization plan that has been approved by the director. The odor minimization plan shall include any measures requested by the director. The plan shall provide detailed information about the facility and shall address all issues relating to odors from oil operations. Matters addressed within the plan shall include setbacks, signs with contact information, logs of odor complaints, method of controlling odors such as flaring and odor suppressants, and the protocol for handling odor complaints. The odor minimization plan shall be reviewed by the operator on an annual basis to determine if modifications to the plan are required. Any modifications to the odor minimization plan shall be submitted to the director for review and approval.	The Odor Minimization Plan was reviewed by FM O&G in 2014 and it was determined that no modifications are required. DRP was notified of this determination on 12/19/14.
E.2.d.	Air Monitoring Plan. At all times the operator shall comply with the provisions of an air monitoring plan that has been approved by the director. The air monitoring plan shall include any measure requested by the director. During drilling, redrilling, and reworking operations, the operator shall monitor for hydrogen sulfide and total hydrocarbon vapors as specified in the approved plan. Total hydrocarbon vapors shall be monitored at the gas plant as specified in the approved plan. Such monitors shall provide automatic alarms that are triggered by the detection of hydrogen sulfide or total hydrocarbon vapors. For drilling, redrilling, or reworking monitors, the alarms shall be audible and/or visible to the person operating the drilling, redrilling, or reworking equipment. For the gas plant monitors, the alarms shall be audible or visible to the gas plant operator. Actions to be taken shall be as follows when specified alarm levels are reached:	FM O&G complied with the provisions of the approved Air Monitoring Plan. Compliance was monitored by County Environmental Compliance Coordinator (ECC) site visits.

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E.2.d.i - iv	<p>i. At a hydrogen sulfide concentration of equal to or greater than five parts per million but less than 10 parts per million, the operator shall immediately investigate the source of the hydrogen sulfide emissions and take prompt corrective action to eliminate the source. The corrective action taken shall be documented in the drilling, redrilling, or reworking log. If the concentration is not reduced to less than five parts per million within four hours of the first occurrence of such concentration, the operator shall shut down the drilling, redrilling, or reworking operations in a safe and controlled manner, until the source of the hydrogen sulfide emissions has been eliminated, unless shutdown creates a health and safety hazard.</p> <p>ii. At a hydrogen sulfide concentration equal to or greater than 10 parts per million, the operator shall promptly shut down the drilling, redrilling, or reworking operations in a safe and controlled manner until the source of the hydrogen sulfide emissions has been eliminated, unless shutdown creates a health and safety hazard. The corrective action taken shall be documented in the drilling, redrilling, or reworking log. When an alarm is received, the operator shall promptly notify the county fire department- Health Hazardous Materials Division, the Culver City Fire Department, the Office of Emergency Services, and the SCAQMD.</p> <p>iii. At a total hydrocarbon concentration equal to or greater than 500 parts per million but less than 1,000 parts per million, the operator shall immediately investigate the source of the hydrocarbon emissions and take prompt corrective action to eliminate the source. The corrective action taken shall be documented in the drilling log for drilling, redrilling, or reworking and in the gas plant log for the gas plant. If the concentration is not reduced to less than 500 parts per million within four hours of the first occurrence of such concentration, the operator shall shut down the drilling, redrilling, reworking, or gas plant operations in a safe and controlled manner, until the source of the hydrocarbon emissions has been eliminated, unless shutdown creates a health and safety hazard.</p> <p>v. At a total hydrocarbon concentration equal to or greater than 1,000 parts per million, the operator shall promptly shut down the drilling, redrilling, or reworking or gas plant operations in a safe and controlled manner, until the source of the hydrocarbon emissions has been eliminated, unless shutdown creates a health and safety hazard. The corrective action taken shall be documented in the drilling log for drilling, redrilling, or reworking and in the gas plant log for the gas plant. When an alarm is received, the operator shall promptly notify the county fire department- Health Hazardous Materials Division, the Culver City Fire Department, and the SCAQMD.</p>	<p>In 2014, no notifications to The County or City of Culver City Fire Departments or AQMD were required.</p>
E.2.d.v	<p>All the monitoring equipment shall keep a record of the levels of total hydrocarbons and hydrogen sulfide detected at each of the monitors, which shall be retained for at least five years. The operator shall, on a quarterly basis, provide a summary of all monitoring events where the hydrogen sulfide concentration was at five parts per million or higher and the total hydrocarbon concentration was at 500 parts per million or higher to the fire chief. At the request of the fire chief, the operator shall make available the retained records from the monitoring equipment.</p>	<p>In 2014, FM O&amp;G provided the Fire Chief with quarterly reports, all of which reported zero (0) events during the respective quarter, on 4/1/14, 7/8/14, 10/1/14 and 1/2/15.</p>
E.2.e	<p>Portable Flare for Drilling. The operator shall have a gas buster and a portable flare, approved by the SCAQMD, at the oil field and available for immediate use to remove any gas encountered during drilling operations from drilling muds prior to the muds being sent to the shaker table, and to direct such gas to the portable flare for combustion. The portable flare shall record the volume of gas that is burned in the flare. The volume of gas burned in the flare shall be documented in the drilling log. The operator shall notify the fire chief and the SCAQMD within 48 hours in the event a measurable amount of gas is burned by the flare, and shall specify the volume of gas that was burned in the flare. No drilling or redrilling shall be conducted in areas that are known to penetrate the Nodular Shale zone unless a fully operational and properly maintained gas buster and portable flare are installed on the rig. All other drilling and redrilling operations shall be conducted so that any measurable gas that is encountered can, and will, be retained in the wellbore until the gas buster and portable flare are installed on the rig, after which the gas will be run through the system. The operator shall immediately notify the fire chief and the SCAQMD in the event any gas from drilling or redrilling operations is released into the atmosphere without being directed to and burned in the flare.</p>	<p>No notifications to the Fire Chief or AQMD were required in 2014.</p>

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E.2.f	<p>Oil Tank Pressure Monitoring and Venting. All oil tanks that contain or could contain oil shall have a fully operational pressure monitoring system that continuously measures and digitally records the pressure in the vapor space of each tank. The detection system shall notify the operator via an alarm when the pressure in the tank gets within 10 percent of the tank relief pressure. In the event of an alarm, the operator shall immediately take corrective action to reduce the tank pressure. The corrective action shall be documented in the operator's log. The operator shall notify the fire chief and the SCAQMD within 24 hours if the pressure in any tank covered by this subsection ever exceeds such tank's relief pressure. Within seven calendar days after any tank vapor release, the operator shall report the incident to the SCAQMD as a breakdown event pursuant to Rule 430, and shall provide the fire chief with a written report of the event and the corrective measures undertaken and to be undertaken to avoid future oil tank vapor releases. The operator shall make any changes to such report that may be required to obtain approval from the fire chief and the SCAQMD, and shall promptly institute all corrective measures called for by the report.</p>	<p>No alarms requiring notification occurred in 2014; hence no notifications to the Fire Chief or the SCAQMD were necessary.</p>
E.2.g	<p>Odor Suppressant for Bioremediation Farms. When loading material or tilling material at the bioremediation farms, the operator shall use an odor suppressant such that no odor from the bioremediation farms can be detected at the outer boundary line.</p>	<p>The biofarms were not operated in 2014.</p>
E.2.h	<p>Odor Suppressant for Drilling and Redrilling Operations. The operator shall use an odor suppressant spray system on the mud shaker tables for all drilling and redrilling operations to ensure that no odors from said operations can be detected at the outer boundary line.</p>	<p>An odor suppressant spray system was used for all drilling and redrilling operations. Presence of the system was verified by County ECC site visits.</p>
E.2.i	<p>Closed Systems. The operator shall ensure all produced water and oil associated with production, processing, and storage, except those used for sampling only, are contained within closed systems at all times.</p>	<p>Closed systems were in place for all produced water and oil associated with production, processing and storage, except those used for sampling only.</p>
E.2.j	<p>Meteorological Station. The operator shall maintain and operate a meteorological station at the oil field in good operating condition and in compliance with all applicable Environmental Protection Agency ("EPA") and SCAQMD rules, regulations, and guidelines, and to the satisfaction of the director. The operator shall conduct an audit of the meteorological station on an annual basis and submit the results of the audit to the SCAQMD and the director. The operator shall maintain the data files for the meteorological station for a period of not less than 10 years. All such data shall be available upon request to the SCAQMD and the director.</p>	<p>FM O&amp;G maintains and operates a meteorological station at the field in compliance with this policy. The 2013 annual audit of the station was submitted to the County on 07/23/14 and the 2014 annual audit is projected to be submitted in the spring or summer of 2014. FM O&amp;G maintains data files for the station from CSD inception to present.</p>
E.2.k	<p>Updated Health Risk Assessment. After every five years of operation of the meteorological station, the operator shall provide the previous five years of metrological data to the SCAQMD and the director. If the SCAQMD or the director determines that the previous five years of metrological data from the oil field could result in significant changes to the health risk assessment that was conducted as part of the Baldwin Hills Community Standards District Environmental Impact Report, then the county may elect to re-run the health risk assessment using the previous five years of metrological data from the metrological station.</p>	<p>In 2015, the last five years of data will be submitted the SCAQMD and the director.</p>
E.2.l	<p>Off-Road Diesel Construction Equipment Engines. All off-road diesel construction equipment shall comply with the following provisions:</p> <ul style="list-style-type: none"> <li>i. Utilize California Air Resources Board ("CARB") EPA Certification Tier III or better certified engines or other methods approved by the CARB as meeting or exceeding the Tier III standard or Tier II certified engines as long as no drilling or redrilling occurs during construction.</li> <li>ii. Utilize a CARB Verified Level 3 diesel catalyst. The catalyst shall be capable of achieving an 85 percent reduction for diesel particulate matter. Copies of the CARB verification shall be provided to the director. Said catalysts shall be properly maintained and operational at all times when the off-road diesel construction equipment is in use.</li> </ul>	<p>All off-road diesel construction equipment engines utilized Tier III or better diesel engines plus Level 3 CARB verified diesel catalysts during all construction projects in 2014.</p>



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E.2.m	<p>Drill Rig Engines. All drilling, re-drilling, and reworking rig diesel engines shall comply with the following provisions:</p> <p>i. Utilize CARB/EPA Certification Tier II or better certified engines, or other methods approved by CARB as meeting or exceeding the Tier II standard.</p> <p>ii. Utilize second generation heavy duty diesel catalysts capable of achieving 90 percent reductions for hydrocarbons and for particulate matter smaller than 10 microns. Said catalysts shall be properly maintained and operational at all times when the diesel engines are running.</p>	<p>All drilling and re-drilling rigs utilized CARB/EPA Certified Tier II or better diesel engines to help reduce NOx emissions and heavy duty diesel catalysts to help reduce hydrocarbons and particulate matter.</p>
E.2.n.	<p>Drilling and Redrilling Setbacks. The following setbacks shall apply within the oil field for drilling or re-drilling:</p> <p>i. At least 400 feet from developed areas.</p> <p>ii. At least 20 feet from any public roadway.</p>	<p>All required drilling and re-drilling setbacks set forth in this policy were complied with as documented in the 2014 Drilling Plan, an amendment to it, and all subsequent, individual well permits approved by the County. Drilling locations were verified by the County during ECC site visits.</p>
E.2.o	<p>Construction Schedule. To reduce construction air emissions, no overlap shall be permitted in major facility construction and installation activities such as the steam drive plant, the water processing facility, or the oil cleaning plant.</p>	<p>There was no overlap in construction activity since no steam drive plant, water processing facility of oil cleaning plant were installed in 2014.</p>
E.2.p	<p>Fugitive Dust Control Plan. The operator shall comply with the provisions of a fugitive dust control plan that has been approved by the director. The plan shall be based upon the requirements of SCAQMD Rule 403 and the SCAQMD CEQA Guideline Fugitive Dust Control Measures. The fugitive dust control plan shall be reviewed by the operator every five years to determine if modifications to the plan are required. Any modifications to the fugitive dust control plan shall be submitted to the director for review and approval. The fugitive dust control plan shall include any measured requested by the director.</p>	<p>The Fugitive Dust Control Plan was submitted on March 26, 2009 and revised and approved in April 2010. Compliance with the provisions of the Plan are verified by the County ECC. FM O&amp;G will review the Plan in 2015 to determine if any modifications to the plan are required.</p>
E.3.a	<p>Natural Gas Liquid Blending. Natural gas liquids at the gas plant shall be blended with the oil to the maximum allowable pipeline system vapor pressure. Natural gas liquids storage shall be limited to the volume allowed in the risk management plan approved by the fire department.</p>	<p>FM O&amp;G blends the natural gas liquids (NGLs) to the maximum allowable pipeline system vapor pressure as required by the subject CSD provision requirement. The storage of the NGL tank is in compliance with the criteria in the Risk Management Plan. The LA County Fire Department verifies compliance with this provision via site inspections.</p>
E.3.b	<p>Propane and Natural Gas Liquids Bullet Fire-Proofing. The operator shall install and maintain fire-proofing insulation on all propane and natural gas liquids bullets within the oil field. The fire-proofing insulation shall have a minimum two hour fire rating and otherwise be acceptable to the fire chief. All propane and natural gas liquid bullets shall be equipped with an automatic deluge system.</p>	<p>The propane and natural gas liquids bullet fire proofing was completed on February 23, 2009 with the associated documentation submitted to the LA County Fire Department on February 25, 2009.</p>
E.3.c	<p>Steam Drive Plant Setback. The steam drive plant, if constructed, shall be located at least 1,000 feet from a developed area and shall use urea or equivalent, low toxicity material for any nitrogen oxide emission reduction that is required by the SCAQMD.</p>	<p>A steam drive plant has not been proposed or constructed to date.</p>
E.3.d.i	<p>The operator shall ensure that all existing oil tank areas in the oil field, unless determined by the director to be infeasible, and all the new oil tank areas shall have secondary containment (berms and/or walls) that can contain at least 110 percent of the largest oil tank volume to reduce the likelihood of oil spills entering the retention basins. In the event the director determines that it would be infeasible to provide 110 percent containment for a particular existing oil tank, the operator shall provide such containment as the director determines is feasible.</p>	<p>As documented in the PXP 2009 Tank Leak Detection and Containment at Inglewood Oil Field report, approved in May 2009, all tanks have secondary containment per this provision.</p>

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E.3.d.ii	All retention basins in the oil field shall be adequately sized, and maintained to handle a 100-year storm event plus a potential spill of the volume of the largest tank that would drain into each basin.	The PXP Retention Basin Study, completed in March 2009 and revised in September 2009 and January 2010, analyzed and modeled the capacities of the basins along with a 100 year storm event. The study concluded that the onsite basins have the capability to handle a 100 year storm event without flooding per the CSD requirement. The study further determined that in the event of an oil tank failure during a 100 year storm event, the basin weir system would prevent oil from going offsite. The County Public Works Department has reviewed and approved the retention basin capacities.
E.3.d.iii	All above ground piping in the oil field that contains or could contain oil shall be protected by basins or secondary containment measures (berms and/or walls).	Most of the above ground piping throughout the oil field is not protected by individual pipeline specific secondary containment or basin structures; however, the oil field retention basin system prevents any fluid from the above ground piping from traveling offsite.
E.4.a.i, ii and iii	<ul style="list-style-type: none"> <li>i. All proposed grading shall be subject to prior review and approval by the director of public works.</li> <li>ii. Grading involving up to 5,000 cubic yards and grading associated with the bioremediation farms may be undertaken pursuant to a county master grading plan stamped by a registered professional engineer and a California certified engineering geologist and approved by the director of public works.</li> <li>iii. No slope of cut or fill shall have a gradient steeper than two to one (2:1) unless specifically approved by a site specific geotechnical report.</li> <li>iv. Cuts and fills shall be minimized to avoid erosion and visual impacts.</li> </ul>	FM O&G conducts all grading in accordance with the approved Master Grading Plan as approved by the LA County Department of Public Works (DPW). The 2015 Master Grading Plan was submitted to DPW on November 13, 2014 and approved on January 20, 2015.
E.4.b.ii	A site-specific geotechnical investigation shall be completed for grading in excess of 5,000 cubic yards, unless associated with the on-site Bioremediation Farms and approved pursuant to a master grading plan approved by the director of public works, and for any grading that supports or impacts a critical facility as determined by the director. The investigation shall be completed by a California certified engineering geologist and submitted to the director and the director of public works for review and approval, in conjunction with an application for a revised grading permit.	A site specific geotechnical investigation was for grading associated with the Stocker Slope Restoration Project that would have been greater than 5,000 cubic yards was approved by the Director and the Director of Public Works on 04/03/14. The project was subsequently cancelled.
E.4.b.ii	A site-specific geotechnical investigation shall be completed for all proposed permanent structures. The investigation shall include analysis and recommendations associated with potential seismically induced ground failure, such as differential settlement and lateral spreading. The geotechnical investigation shall be completed by a California-certified engineering geologist and submitted to the director of public works for review and approval.	Geotechnical investigations have been completed for the installation of permanent structures and are submitted to the County with applications to the Department of Regional Planning (DRP) and Building & Safety.
E.4.c.i	The operator shall comply with all provisions of an erosion control plan that has been approved by the director. The erosion control plan shall be reviewed by the operator every two years to determine if modifications to the plan are required. Any modifications to the erosion control plan shall be submitted to the director for review and approval. The erosion control plan shall include any measures requested by the director.	The PXP 2009 Erosion Control Plan Inglewood Oil Field was initially submitted on May 26, 2009, revised in October 2009 and approved by County Public Works in May 2010. FM O&G reviewed the Erosion Control Plan in 2014 and determined that no modifications to the plan are required. The County was notified of this determination on 05/15/14. The next bi-annual review will occur in May of 2016.
E.4.d	Restoration of Slopes. Slopes shall be restored to their original grade once the use that required the grading of the slope has been discontinued. However, if restoration of a slope would negatively affect existing drainage patterns or slope stability, then the slope shall be restored to a grade that avoids these negative effects.	No grading conducted that would negatively affect existing drainage patterns or slope stability occurred in 2014.

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E.4.e	<p>Ground Movement Surveys. The operator shall conduct ground movement surveys once every 12 months, or more frequently if determined necessary by the director of public works, following all provisions of a ground movement monitoring plan that is acceptable to DOGGR and the director of public works, that calls for both vertical and horizontal ground movement surveys, at specified survey locations within, and in the vicinity of, the oil field, utilizing high precision Global Positioning System technology, in combination with a network of ground stations (or any alternative technology specified in the ground movement monitoring plan approved by the director of public works), and following other survey methods outlined in the plan. The surveys shall be conducted by a California-licensed surveyor. The survey results shall be analyzed in relation to oil field activities, such as production, steam injection, and water flooding, taking into consideration individual oil producing zones, injection schedules, rates, volume, and pressure. The analysis shall be completed in collaboration by a California-registered professional petroleum engineer, registered geotechnical engineer, and certified engineering geologist. The results of the annual monitoring survey and analysis shall be forwarded to DOGGR and the director of public works. If requested by DOGGR or the director of public works, the operator shall make modifications to the ground movement monitoring plan. In the event that survey indicates that on-going ground movement, equal to or greater than 0.6 inches at any given location, or a lesser value determined by the director of public works is occurring in an upward or downward direction in the vicinity of or in the oil field, the operator shall review and analyze all claims or complaints of subsidence damage that have been submitted to the operator or the county by the public or a public entity in the 12 months since the last ground movement survey. Based thereon, the operator shall prepare a report that assesses whether any of the alleged subsidence damage was caused by oil operations and submit said report to DOGGR and the department of public works. The department of public works shall review the report to determine if it concurs with its conclusions. If the report concludes that damage has not been caused by oil operations, and the department of public works does not concur in that conclusion, it shall forward its conclusions to DOGGR for its review and possible action. If the report concludes that damage was caused by oil operations and the department of public works concurs with any such conclusion, the department of public works shall forward the department of public works' conclusions to DOGGR and ask DOGGR to evaluate the operator's fluid injection and withdrawal rates to determine whether adjustments to these rates may alleviate the ground movement, and if so, where in the oil field such adjustments should be made. The operator shall implement whatever adjustments in the rates of fluid injection and/or withdrawal that DOGGR determines are necessary and appropriate to alleviate any ground movement damage. The county shall promptly notify the CAP of any such action that is taken pursuant to this subsection. Injection pressures associated with secondary recovery operations (i.e., water flooding) or disposal of produced fluids shall not exceed reservoir fracture pressures as specified in Title 14 of the California Code of Regulations, section 1724.10, and as approved by the DOGGR.</p>	<p>Ground movement surveys have been completed annually as required by the approved, Accumulated Ground Movement Plan. The 2013 annual survey was submitted in October 2014 to the DOGGR and DPW. The 2014 annual survey is underway. The report is expected to be submitted in the summer of 2015.</p> <p>At least one monument had movement up or down during 2013 which was equal to or greater than 0.6 inches. This result triggers the requirement to investigate complaints of subsidence damage from the public. Five damage claims were investigated for 2013. Reports were prepared on the property damage complaints and submitted to County Public Works and DOGGR for review; none of the reports concluded that the reported damage was caused by the oil field.</p>
E.4.f	<p>Construction of Permanent Structures. No permanent structures shall be constructed in an Alquist-Priolo Fault Zone without preparation of a fault study by a California-certified engineering geologist. Following the fault study, no permanent structures shall be placed within 50 feet of a known active fault. The fault investigation report shall be submitted to the director of public works for review and approval.</p>	<p>No permanent structures have been constructed in an Alquist-Priolo Fault Zone since the adoption of the CSD.</p>
E.4.g	<p>Oil Field Accelerometer. The operator shall operate and maintain an accelerometer at the oil field to determine site-specific ground accelerations as a result of any seismic event in the region (Los Angeles/Orange County and offshore waters of the Santa Monica Bay and San Pedro Channel). Readings from the accelerometer shall be recorded at the oil field and transmitted in real-time to the Caltech Seismological Laboratory. The operator shall cease operations and inspect all oil field pipelines, storage tanks, and other infrastructure following any seismic event that exceeds a ground acceleration at the oil field of 13 percent of gravity (0.13 g) and promptly notify the director. The operator shall not reinstitute operations at the oil field and associated pipelines until it can reasonably be determined that all oil field infrastructure is structurally sound.</p>	<p>The oil field accelerometer seismic station was installed and began collecting data on May 20, 2009. The data is transmitted in real time by cell link to the CalTech Seismological Laboratory where the data is recorded and stored. The accelerometer has not measured ground acceleration in excess of the 13 percent of gravity (0.13 g) criteria of this provision to date, thus the oil field has not been required to shut in due to a ground acceleration event.</p>
E.4.h	<p>Pipeline Management Plan. The operator shall maintain and implement a pipeline management plan that meets the requirements of DOGGR regulations.</p>	<p>The pipeline management plan is being maintained per DOGGR regulations.</p>

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E.4.i	Paleontological Monitor. The operator shall have a qualified paleontologist, approved by the director, monitor all rough grading and other significant ground disturbing activities in paleontological sensitive sediments. The sensitive sediments that have been identified within the oil field include the Lower to Middle Pleistocene San Pedro Formation and the Middle to Upper Pleistocene Lakewood Formation. A paleontologist will not be required on site if excavation is only occurring in artificial fill or Holocene alluvium.	In 2014, no work occurred in paleontological sensitive sediments. As such, no monitoring occurred.
E.5.a	E.5.a Noise Limits. The operator shall comply with the following provisions: i. All oil operations on the oil field shall comply with the noise provisions of Chapter 12.08 of Title 12 of the County Code, with the exception of drilling, redrilling, and reworking, which are exempt from the provisions of said chapter. ii. Hourly, A-weighted equivalent noise levels associated with drilling, redrilling, and reworking shall not elevate existing baseline levels by more than five dBA at any developed area. For daytime activities (7:00a.m. to 7:00p.m.) existing baseline noise levels shall be defined as the maximum daytime equivalent noise level (Leq) at the closest monitoring site as shown in Table 4.9.3 of the 2008 Baldwin Hills Community Standards District Environmental Impact Report. For nighttime activities (7:00 p.m. to 7:00a.m.), existing baseline noise levels shall be defined as the minimum nighttime equivalent noise level (Leq) at the closest monitoring site as shown in Table 4.9.3 of the 2008 Baldwin Hills Community Standards District Environmental Impact Report. Updated baseline noise levels may be set and additional monitoring sites may be established, from time to time by the director. In no case shall baseline noise levels include any drilling, redrilling, or reworking operations. iii. Noise produced by oil operations shall include no pure tones when measured at a developed area.	Noise monitoring to date has not identified any violations associated with oil field operations above the baseline levels of the noise limits set forth in the CSD or Settlement Agreement. However, noise levels above the maximum criteria have been documented during drilling, redrilling, or well reworking activities. The data associated with these peak noise readings were investigated and analyzed by the County noise expert. Results of the analysis determined the cause to be emergency vehicles, motorcycles, airplanes, and portable equipment used for landscaping thus confirming compliance with the noise requirements of the CSD and Settlement Agreement.
SA 2	a. The CSD currently provides that hourly, A-weighted equivalent noise levels associated with drilling, redrilling and reworking wells shall not elevate baseline levels (which shall not include drilling, redrilling or reworking operations) by more than five A-weighted decibels ("dBA") at the Oil Field boundary of any Developed Area. Instead of the referenced five dB A provision, PXP shall limit the night time (10 p.m. to 7 a.m.) noise levels at Developed Areas to no more than three dBA above a one-hour baseline average for the defined nighttime period, but at no time will PXP be required to maintain noise levels below the baseline nighttime noise levels. Furthermore, PXP and the County determined the baseline noise levels at four additional Oil Field boundary locations near Developed Areas, selected by PXP and the County, in addition to the seven utilized in the EIR for a total of 11 locations. If PXP violates the above noise requirements, no new drilling or redrilling permits shall be issued by the County until PXP, in consultation with the County, identifies the source of the noise and PXP takes steps necessary to assure compliance with the above-specified threshold. b. If drilling, redrilling or reworking operations elevate nighttime baseline noise levels by more than 10 dBA for more than 15 minutes in any one hour as independently verified and determined by the County, PXP, in consultation with the County, shall identify the cause and source of the noise and take steps to avoid such extended periods of noise elevation in the future. This provision does not negate the CSD noise limits between 7 a.m. to 10 p.m.	Noise monitoring to date has not identified any violations associated with oil field operations above the baseline levels of the noise limits set forth in the CSD or Settlement Agreement. However, noise levels above the maximum criteria have been documented during drilling, redrilling, or well reworking activities. The data associated with these peak noise readings were investigated and analyzed by the County noise expert. Results of the analysis determined the cause to be emergency vehicles, motorcycles, airplanes, and portable equipment used for landscaping thus confirming compliance with the noise requirements of the CSD and Settlement Agreement.
E.5.b	Backup Alarms. Backup alarms on all vehicles operating within the oil field shall be disabled between the hours of 8:00 p.m. and 8:00 a.m. During periods when the backup alarms are disabled, the operator shall employ alternate, low-noise methods for ensuring worker safety during vehicle backup, such as the use of spotters.	This provision has been implemented and is ongoing.
E.5.c	Quiet Mode Drilling Plan. All drilling and redrilling on the oil field between the hours of 6:00 p.m. and 8:00 a.m. shall be conducted in conformity with a quiet mode drilling plan that has been approved by the director and the director of public health. The quiet mode drilling plan shall be reviewed by the operator every year to determine if modifications to the plan are required. The operator shall make changes to the plan if requested by the director or the director of public health. Any modifications to the quiet mode drilling plan shall be submitted to the director and the director of public health for review and approval. The quiet mode drilling plan shall include any measures requested by the director or the director of public health.	All drilling and redrilling activity that occur during the hours specified in this provision are conducted in conformance with the Quiet Mode Drilling Plan. FM O&G reviewed the Quiet Mode Drilling Plan concluded that there are no modifications necessary to the plan in 2014. Notice of this annual review was sent to DRP on 12/19/14.
E.5.d	Equipment Servicing. All noise producing oil field equipment shall be regularly serviced and repaired to minimize increases in pure tones and other noise output over time. The operator shall maintain an equipment service log for all noise-producing equipment.	FM O&G Operations maintains service records for such equipment.

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E.5.e	Deliveries to the Oil Field. Deliveries to the oil field shall not be permitted after 8:00 p.m. and before 7:00a.m. except in cases of emergency. Deliveries on Sundays or legal holidays shall not be permitted after 8:00 p.m. or before 9:00a.m., except in cases of emergency.	This provision has been implemented and is ongoing.
E.5.f	Deliveries within the Oil Field. Deliveries to areas of the oil field located within 500 feet of any residential property shall not be permitted after 5:00 p.m. or before 7:00a.m. except in cases of emergency. Deliveries to such areas on Sundays or legal holidays shall not be permitted after 5:00 p.m. and before 9:00a.m., except in cases of emergency.	This provision has been implemented and is ongoing.
E.5.g	Time Limits for Construction. Construction of permanent structures shall not be permitted after 7:00 p.m. and before 7:00a.m., or during Saturdays, Sundays, or legal holidays.	No construction occurs after 7:00 p.m. and before 7:00 a.m., or during Saturdays, Sundays, or legal holidays.
E.5.h	Construction Equipment. All construction equipment shall be selected for low-noise output. All construction equipment powered by internal combustion engines shall be properly muffled and maintained.	All construction equipment is selected to comply with this provision.
E.5.i	Construction Equipment Idling. Unnecessary idling of construction equipment internal combustion engines is prohibited.	All FM O&G construction equipment operators implement this provision.
E.5.j	Worker Notification. The operator shall instruct employees and subcontractors about the noise provisions of this subsection E.5 prior to commencement of each and every drilling, re-drilling, reworking, and construction operation, and shall annually certify to the director that such employees and subcontractors have been properly trained to comply with such noise provisions. The operator shall prominently post quiet mode policies at every drilling and re-drilling site.	Employees and contractors were trained on this provision in 2014 and certification of such was provided to the DRP on 12/23/14.
E.6	Vibration Reduction. All oil operations on the oil field shall be conducted in a manner that minimizes vibration. Additionally, vibration levels from oil operations at the oil field shall not exceed a velocity of 0.25 mm/s over the frequency range 1 to 100 Hz at any developed area.	All operations are conducted to minimize vibration. The report prepared by the County in response to the request by PXP in October 2011 to increase the annual number of wells allowable for drilling or re-drilling, the Annual Well Increase Evaluation, December 2011, includes analysis on the implementation of the vibration provision of the CSD. The report concluded that the CSD requirements have been effective at keeping vibration to a level that is considered protective of the health and general welfare of the public. Further, the draft periodic review concluded that this provision is fully effective.
E.7.a	Oil Spill Response. The operator shall comply with all provisions of an Emergency Response Plan ("ERP") that has been approved by the director, to protect biological species and to revegetate any areas disturbed during an oil spill or clean-up activities. The operator shall make changes to the ERP if requested by the director. Any modifications to the ERP shall be submitted to the director for review and approval. The ERP shall include any measures to protect biological species that may be requested by the director.	Since approval of the ERP by DRP, no updates have been needed or requested.
E.7.b	Special Status Species and Habitat Protection. The operator shall comply with all provisions of a special status species and habitat protection plan that has been approved by the director. The operator shall make changes to the plan if requested by the director. Any modifications to the plan shall be submitted to the director for review and approval. The special status species and habitat protection plan shall include any measures requested by the director.	The Special Status Species and Habitat Protection Plan was first prepared in 2009 and was approved on November 15, 2010. The plan was prepared by a County approved ecologist/biologist. Compliance with subsections E.7.b through E.7.h is documented annually since 2010.

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E.7.c, h	<p>c) Habitat Restoration and Revegetation Plan. Prior to any disturbance of sensitive natural habitat areas, as identified in the special status species and habitat protection plan, the operator shall hire a biologist, approved by the county, to conduct a survey of the area to determine if significant impact to sensitive natural habitat, including coastal sagebrush, coyote bush scrub, riparian scrub, and oak woodland will occur. If the biologist determines that significant impact to sensitive natural habitat will occur, then the operator shall have a county-approved restoration specialist, with expertise in southern California ecosystems and revegetation techniques, prepare a habitat restoration and revegetation plan. The plan shall be submitted to the director for review and approval. The director shall make best efforts to complete the review of the plan as expeditiously as possible and shall then either approve the plan or provide the operator with a list of specific items that must be included in the plan prior to approval. No removal of sensitive natural habitat shall occur until the plan has been approved by the director. The habitat restoration and revegetation plan shall include any measures requested by the director.</p> <p>h) Habitat Restoration. Within 60 days of completion of construction activities that have significantly impacted sensitive natural habitat, the operator shall begin habitat restoration consistent with the approved native habitat restoration and revegetation plan discussed in subsection E.7.c. Restoration priority shall be given to areas of degraded habitat connecting areas of higher quality habitat and where restoration would produce larger corridors to support the migration and movement of wildlife. The operator shall replace any significant loss of sensitive natural habitat at the following ratios:</p> <p>i. 1:1 for each acre of coastal sagebrush or coyote bush scrub.</p> <p>ii. 2:1 for each acre of riparian scrub or oak woodland.</p>	<p>A Habitat Restoration and Revegetation Plan for the Stocker Slope Restoration Project was approved by the County in November 2013. The Project was subsequently cancelled.</p>
E.7.d, e, f, g	<p>d) Pre-Construction Surveys. The following surveys shall be conducted prior to any significant vegetation removal in sensitive natural habitat as identified in the special status species and habitat protection plan.</p> <p>e) Listed Plant or Wildlife Species. If federal- or State-listed plant or wildlife species are found, then the operator shall comply with all applicable United States Fish and Wildlife and California Department of Fish and Game rules and regulations.</p> <p>f) Construction Monitoring. If the pre-construction surveys find sensitive plant, wildlife species, or nesting birds, a biological monitor hired by the operator, and approved by the County, shall be on site during construction to monitor the construction activities.</p> <p>g) Tree and Riparian Scrub Removal. Removal of native or non-native trees and riparian scrub vegetation shall be scheduled, as possible, for removal outside the nesting season to avoid impacts to nesting birds. If avoidance of removal of trees or riparian scrub during the recommended periods is not possible, a county-approved biologist shall perform a survey to ensure that no nesting birds are present prior to removal. If for any reason a nest must be removed during the nesting season, the operator shall provide written documentation to the director demonstrating concurrence from the United States Fish and Wildlife Service and California Department of Fish and Game authorizing the nest relocation and a written report documenting the relocation efforts.</p>	<p>All required pre-construction surveys and construction monitoring were completed in 2014 and will be documented in the 2014 Special Status Species and Habitat Protection Plan annual report (report) scheduled for submittal in the Spring of 2015. The 2013 report was submitted to DRP on 06/13/14. No listed plant or wildlife species were found.</p>
E.8.a	<p>Cone Trust House. Oil operations shall not result in impacts to the Cone Trust House</p>	<p>The Cone Trust House is off limits to oil field staff to prevent any impacts to the building.</p>
E.8.b	<p>E.8.b) Archeological Training. The operator shall provide archeological training for all construction personnel who will be involved with ground disturbance activities at the oil field. All such construction personnel shall be required to participate in the training and will receive training material prepared by a qualified archaeologist prior to working on ground disturbance activities.</p>	<p>All construction personnel involved with ground disturbance activities were provided archeological training in 2014.</p>

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E.8.c	Construction Treatment Plan. The operator shall comply with all provisions of a construction treatment plan, approved by the director, to ensure that any new archeological discoveries are adequately recorded, evaluated, and, if significant, mitigated. In the event that unknown archaeological artifacts are encountered during grading, clearing, grubbing, and/or other construction activities, work shall be stopped immediately in the vicinity of the find and the resource shall be evaluated by a qualified archaeologist, approved by the director. The construction treatment plan shall include any measures requested by the director.	No archaeological artifacts were uncovered in 2014.
E.9	Lighting. Outdoor lighting shall be restricted to only those lights which are required by code for the lighting of building exteriors, drilling, and redrilling rigs and for safety and security needs. In addition, the operator shall comply with the following provisions: a. Screening. All new point lighting sources within the oil field shall be screened and directed to confine direct rays to the oil field and to prevent offsite spillover lighting effects to the extent feasible. b. Lighting Plan. A detailed lighting plan shall be prepared for each new permanent structure and submitted to the director for review and approval. No work may be commenced on such permanent structure until the lighting plan therefore has been approved by the director. The lighting plan shall include any measures requested by the director.	In November 2008, an assessment of all oil field lighting was completed to confirm compliance with the CSD lighting provisions and to confirm that there were no offsite lighting impacts.
E.10 SA 11	E.10: Landscaping, Visual Screening, Irrigation and Maintenance. The operator shall comply with the conceptual landscaping plan for the oil field prepared by Mia Lehrer & Associates, dated October 2008, on file at the department of regional planning, which is intended to beautify and screen the oil field from adjoining residential, recreational, and institutional areas or adjacent public streets or highways. Landscaping required by this plan shall be completed in phases over a two-to five-year period as approved by the director. All landscaping on the oil field shall be routinely inspected (on at least a monthly basis) and maintained in a neat, clean, and healthful condition, including proper watering, pruning, weeding, fertilizing, and replacement of plants as needed. Litter shall also be removed on a regular basis. SA 11: Landscaping. PXP agrees to prepare and implement a series of landscape plans ("Landscape Plans") that enhance the Mia Lehrer Landscape Improvements Concepts plan dated November 4, 2008 to include, but not be limited to, landscaping along or near the border of the Oil Field in consultation with the County and subject to the County's approval. PXP's Landscape Plans shall be forwarded to the CAP for review. PXP will use best efforts to complete installation of the first two phases of the Landscape Plans along La Brea, between Stocker and Slauson, and Ladera Crest, within nine (9) months of County's final approvals of each of those first two Landscaping Plans using best landscaping practices. PXP agrees that it will complete the entire landscaping required by the County-approved Landscape Plans within three years after approval by the County of the final phase.	Landscaping for Phases 1 (Windsor Hills/La Brea), 2 (Ladera Crest looking north) and 5 (north of Stocker and on the west side of La Cienega) have been completed and are routinely inspected. Phases 3 (Ladera Crest La Cienega looking east) and 4 (north of Stocker on the east side of La Cienega) has been approved by the County. Phase 6 (Fairfax Avenue) was submitted to the county on 12/29/14 for approval and the Phase 7 (Stocker Street) draft is posted at <a href="http://www.inglewoodoilfield.com">www.inglewoodoilfield.com</a> for CAP review.
E.11.a and b	Oil Field Waste Removal. The operator shall comply with the following provisions: a) Waste Collection. All drilling, redrilling, and reworking waste shall be collected in portable steel bins compliant with United States Department of Transportation standards. Any drilling, redrilling, and reworking wastes that are not intended to be injected into a Class II Well, as permitted by DOGGR, shall be removed from the oil field no later than 30 days following completion of the drilling, redrilling, and reworking. This provision does not apply to active sumps and mud pits. b) Waste Discharge. No oil field waste shall be discharged into any sewer, storm drain, irrigation systems, stream or creek, street, highway, or drainage canal. Nor shall any such wastes be discharged on the ground provided that the foregoing shall not prohibit the proper use of active drilling sumps and mud pits.	All drilling, redrilling and reworking wastes were collected in portable steel bins compliant with USDOT standards and removed from the field within 30-days of completion of the activity. There are no sumps or mud pits on the field. No oil field waste was discharged off site.
E.11.c	Recycling Plan. The operator shall comply with all provisions of a recycling plan that has been approved by the director. The recycling plan shall include any elements requested by the director.	The Recycling Plan was approved on October 3, 2011 and has been implemented and is ongoing.

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E.12	<p>Construction of Private Roads. Roads and other excavations shall be designed, constructed, and maintained to provide stability of fill, minimize disfigurement of the landscape, prevent deterioration of vegetation, maintain natural drainage, and minimize erosion. Prior to construction of any new road, the operator shall prepare and submit to the director of public works for review and approval a private road construction plan. The operator shall thereafter comply with all provisions of the approved private road construction plan. All new private access roads leading off any surfaced public street or highway shall be paved with asphalt or concrete not less than three inches thick for the first 50 feet of said access road from the public street or highway.</p>	<p>No private roads have been constructed to date and all oil field activities utilize existing access roads.</p>
E.13.a-e	<p>Signs. All signage shall comply with Part 10 of Chapter 22.52 of Title 22. In addition, the operator shall comply with the following provisions:</p> <p>a. Perimeter Identification Signs. Identification signs, at intervals acceptable to the director, shall be posted and maintained in good condition along the outer boundary line fence and along the fences adjoining the public roads that pass through the oil field. Each sign shall prominently display current and reliable emergency contact information that will enable a person to promptly reach, at all times, a representative of the operator who will have the expertise to assess any potential problem and recommend a corrective course of action. Each sign shall also have the telephone number of the county department of regional planning zoning enforcement section and the number of SCAOMD that can be called if odors are detected.</p> <p>b. Main Entrance Sign. A sign shall be posted and maintained in good condition at the main entrance of the oil field prominently displaying a telephone number by which persons may contact a representative of the operator at all times to register complaints regarding oil field operations.</p> <p>c. Other Required Signs. All identification signs, warning signs, no trespassing signs, and other signs required by county, state and federal regulations shall be properly posted and maintained in all required locations and in good condition.</p> <p>d. Well Identification Signs. Well identification signs including the well name and well number shall be posted and maintained in good condition at each well location.</p> <p>e. No Littering Signs. "No littering" signs shall be prominently posted and maintained in good condition on all oil field entrance gates.</p>	<p>The installation of the signage required by this provision was completed upon approval of the Signage Plan dated January 2009 (Revision1) and approved by the County on May 18, 2009. All required signage was updated to reflect to the name new Operator of the oil field, Freeport-McMoRan Oil &amp; Gas and to remove the name of the previous Operator, Plains Exploration &amp; Production Company (PXP).</p>
E.14	<p>Painting. All oil operation-related structures visible from public roadways and surrounding properties within the oil field shall be painted or otherwise surfaced or textured with a color that is compatible with the surrounding areas and has been approved by the director. The painting or other surfacing of all structures covered by this subsection shall thereafter be maintained in good condition.</p>	<p>The painting of the Inglewood Oil Field structures and equipment was completed on November 12, 2012. The paint color, licorice, was chosen with assistance of a landscape architect and was approved by the LA County Department of Regional Planning. Maintenance of the painting and coatings of the equipment and structures at the oil field is a continuous process.</p>
E.15	<p>Sumps. The operator shall comply with all of the following provisions:</p> <p>a. Sump Clean Out. All sumps that are used, installed, or maintained for use in connection with any well, and which have not been used for 90 days for the operation of or the drilling, re-drilling, or reworking of such well or any other well in the vicinity, shall be cleaned out, and all oil, rotary mud, and rubbish removed.</p> <p>b. Sump Fencing. Around each sump of any depth, there shall be erected and continuously maintained a fence that encloses the sump and complies with the requirements of Sections 11.48.010 - 11.48.050, Title 11 of the County Code. This provision shall not apply to sumps that are constantly and immediately attended while drilling, re-drilling, and reworking operations are proceeding as specified in Section 11.48.020, Title 11 of the County Code.</p>	<p>There are no sumps at the Inglewood Oil Field.</p>



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E.16.a-d	<p>Well Cellars. All well cellars shall be constructed in accordance with the most current American Petroleum Institute standards. In addition, the operator shall comply with the following provisions:</p> <p>a. Cellar Fluids. Well cellars shall be kept free of all oil, water, or debris at all times. During drilling, redrilling, and reworking, the cellar shall be kept free of excess fluids by a pump which discharges into a waste tank, mud pit, vacuum truck, or other approved disposal system.</p> <p>b. Access to Multi-Well Cellars. All multi-well cellars exceeding three feet in depth and 25 feet in length shall have two means of entrance and exit and an additional exit for every 50 feet in length thereafter. At least one means of entrance or exit for all multi-well cellars of 25 feet in length shall be a stairway constructed to California Division of Industrial Safety standards.</p> <p>c. Single-Cellar Covers. All single-cellars shall be covered with open grating and have no openings larger than three inches at any point. Covers shall be capable of supporting vehicle weight or guardrails shall be erected to prevent vehicle access.</p> <p>d. Cellar Ladder Openings. All openings for ladders through grating shall be designed to allow exit from underside without obstruction and shall be kept free of storage of any type. Said openings shall not be less than 24 inches on either side.</p>	Implementation is ongoing where applicable.
E.17.a	<p>Construction Storm Water Pollution Prevention Plan ("SWPPP"). The operator shall maintain and implement all provisions of a storm water pollution prevention plan ("SWPPP") that has been inspected by the Regional Water Quality Control Board and the county department of public works. The operator shall provide the director and the director of public works with a copy of the SWPPP, and any future modifications, revisions, or alterations thereof, or replacements therefore. The SWPPP shall be updated prior to new construction activities as required by the Regional Water Quality Control Board.</p>	The DPW was provided with the most up-to-date copy of the RWQCB reviewed SWPPP on 11/26/13.
E.17.b	<p>Spill Prevention, Control, and Countermeasure Plan ("SPCCP"). The Operator shall maintain and implement all provisions of a spill prevention, control, and countermeasure plan ("SPCCP") which meets the requirements of the Local California Unified Program Agency and the United States Environmental Protection Agency. The operator shall provide the director and the fire chief with a copy of the SPCCP and any future modifications, revisions, or alterations thereof, or replacements therefore.</p>	FM O&G provided DRP and the Los Angeles County Fire Department (LACFD) a copy of the most up-to-date SPCC on 10/09/13.
E.17.c	<p>Hydrological Analysis. A site-specific hydrologic analysis shall be completed to evaluate anticipated changes in drainage patterns and associated increased runoff at the site for any new grading that results in the loss of vegetated, sandy, permeable ground areas, which could alter surface runoff at the site. The analysis shall be completed consistent with Standard Urban Stormwater Mitigation Plan regulations, as specified in the county department of public works Hydrology Manual as amended. The hydrological analysis shall be submitted to the director of public works for review and approval. The new grading that required the hydrologic analysis shall not occur until approval of the analysis by the director of public works.</p>	The hydrologic analysis has not occurred to date because no oil field projects have triggered the requirement.
E.18	<p>Water Management Plan. The operator shall comply with all provisions of a water management plan that has been approved by the director and the director of public works. The plan shall include best management practices, water conservation measures, the use of a drip irrigation system, and shall include provisions for the use of surface water runoff in the retention basins for dust suppression and landscaping. The plan shall also address the availability of reclaimed water for use at the oil field. The water management plan shall be reviewed by the operator every three years to determine if modifications to the plan are required. The operator shall make changes to the plan if requested by the director or the director of public works. Any modifications to the water management plan shall be submitted to the director and the director of public works for review and approval. The water management plan shall include any elements requested by the director or the director of public works. In addition, the operator shall comply with the water conservation measures and reporting requirements specified in Sections 20.09.020- 20.09.080, Title 20 of the County Code (Utilities).</p>	The Water Management Plan was initially submitted in May 2009 and was formally approved by County Public Works on August 8, 2012 and the County DRP on September 13, 2012.

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E.19	Groundwater Monitoring. The operator shall develop, implement, and carry out a groundwater quality monitoring program for the oil field that is acceptable to the director and consistent with all requirements of the Regional Water Quality Control Board. Pursuant to the approved program, the operator shall install and maintain groundwater monitoring wells in the vicinity of each surface water retention basin, which is permitted by the Regional Water Quality Control Board. Such monitoring wells shall be completed to the base of the permeable, potentially water bearing, alluvium, Lakewood Formation, and San Pedro Formation, and to the top of the underlying, non-water bearing Pica Formation, as determined by a California-certified professional geologist. The Regional Water Quality Control Board and the director shall be regularly advised of the results of such monitoring and shall be immediately advised if such monitoring indicates a potential problem.	Quarterly groundwater sampling was conducted on a quarterly basis consistent with the provisions of the Groundwater Monitoring Program and Work plan and monitoring reports were submitted to DRP and the Los Angeles Regional Water Quality Control Board (RWQCB) quarterly.
E.20	Fencing. All portions of the oil field on which oil operations are conducted shall be enclosed with a fence compliant with DOGGR regulations codified at California Code of Regulations Title 14, Article 3, sections 1778 and 1779, or as may be subsequently amended by the state.	The Inglewood Oil Field is enclosed by fencing and gates compliant with the regulations cited in this provision.
E.21.a SA.12	E.21.a: Equipment Removal. All facilities that have reached the end of their useful economic life shall be properly decommissioned and removed from the oil field within one year. Areas not slated for future use shall be restored and revegetated within 90 days of termination of use, unless such restoration and revegetation would interfere with fire safety or access to oil operations. SA.12: Clean-Up Plan. The CSD requires PXP to decommission and remove facilities that have reached the end of their useful economic life (County Code section 22.44.142.E.21.a) and submit to the County for its approval an unused or abandoned equipment removal plan (County Code section 22.44.142.L.14). PXP has submitted such a plan in 2009 and shall periodically update the plan should additional equipment, not identified in PXP's original removal plan, become unused or abandoned. Equipment and materials not necessary to oil field operations as identified by the Director of Planning shall be promptly removed from view of Sensitive Developed Areas as addressed in the plan.	The equipment removal plan was updated through December 2013 and submitted to DRP on 3/3/14.
E.21.b	Equipment Maintenance. All equipment, improvements, facilities, and other personal property or fixtures located on the oil field shall be maintained in good condition to the satisfaction of the director and the director of public works.	Equipment at the oil field is inspected and maintained by the field operations staff with operators completing rounds of the facility daily.
E.21.c	Site Debris and Vegetation. The operator shall keep the property free of debris and vegetation overgrowth to the satisfaction of the director. All outside storage of parts or equipment shall comply with Part 7 of Chapter 22.52 of the County Code.	The Inglewood Oil Field is kept free of debris and vegetation overgrowth.
E.22	Security. All unmanned entrances to the oil field shall be equipped with sliding gates which shall be kept closed at all times except when authorized vehicles are entering or leaving the oil field. The operator shall have a security guard on duty 24 hours per day.	All gates at the oil field are consistent with these regulations and all unmanned entrances are equipped with the required sliding type gates.
E.23	Vehicle Parking. Vehicular parking shall comply with Part 11 of Chapter 22.52 of County Code.	All vehicle parking complies with the referenced code.
E.24.a	Sanitation. The operator shall comply with the following provisions: a. Garbage and Refuse. The oil field shall be maintained in a clean, sanitary condition, free from accumulations of garbage, refuse, and other wastes.	The field is maintained in accordance with this provision. Garbage and refuse are picked up and removed weekly by a subcontractor garbage collection company.
E.24.b	Toilets and Wash Facilities. Sanitary toilet and washing facilities shall be installed at any site where personnel are permanently stationed. Portable facilities shall be provided wherever crews are temporarily employed. Such facilities shall be maintained in a clean and sanitary condition at all times.	Permanent toilet and wash facilities are located at the office building, the warehouse, the gas plant, the "halfway house" across from the gas plant, and at two modular buildings used by sub-contractors. The restroom facilities are maintained by a sub-contractor janitorial service. Portable facilities are located throughout the field and moved as needed, the portable restrooms are maintained by the subcontractor providing the units.

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E.25	Storage of Hazardous Materials. The operator shall comply with all provisions of a hazardous materials business plan that has been submitted to the fire chief. The operator shall deliver to the fire chief for review and approval an updated hazardous material business plan on an annual basis. This plan shall provide the location of where hazardous materials are stored at the oil field. Hazardous materials shall be stored in an organized and orderly manner and identified as may be necessary to aid in preventing accidents, and shall be reasonably protected from sources of external corrosion or damage to the satisfaction of the fire chief.	The annual Hazardous Materials Business Plan was submitted to the LA County Fire Chief on 09/29/14. On 9/17/14, the LACFD issued an administration/documentation, minor (class) violation for an incomplete hazardous materials inventory submittal. The issue was reconciled on 9/30/14. The County DRP issued a subsequent, and identical, violation to that of LACFD on 10/22/14. Within the DRP notice of violation, it was acknowledged that the violation had already been cured as verified by the LACFD on 9/17/14.
E.26.a	DOGGR Regulations. All DOGGR regulations related to drilling, redrilling, and reworking operations.	Drilling, redrilling and reworking operations are in compliance with all applicable DOGGR regulations.
E.26.b SA 3	E.26.b: Number of Drilling and Redrilling Rigs. No more than three drilling or redrilling rigs shall be present within the oil field at any one time. SA 3: Notwithstanding the CSD's allowance for operations of a maximum of three drill rigs at any one time on the Oil Field, PXP shall limit to two the number of drill rigs in use at any one time.	The approved 2014 and 2015 Drilling Plans required per Section E.26.c limits FM O&G to two drilling rigs, and no more than two drilling rigs have been - or plan to be - used at any one time on the Oil Field.
E.26.c SA 1	Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan. Before the end of each calendar year, the operator shall develop and deliver to the director an annual drilling, redrilling, well abandonment, and well pad restoration plan, which shall describe all drilling, redrilling, well abandonment, and well pad restoration activities that may be conducted during the upcoming calendar year. Drilling and redrilling shall be scheduled to avoid over concentration of such activities in that year in any one area if located near a developed area. The operator may at any time submit to the director proposed amendments to the then current annual plan. No drilling, redrilling, or abandonment activity may be commenced unless it is described in a current annual plan (or an amendment thereto) which has been approved by the director. The annual plan (and any amendments) shall be provided to the CAP for review and comment. All comments on the annual plan from the CAP shall be submitted to the director in writing, and, if timely submitted, will be considered as part of the director's review and approval. The director shall complete the review of the annual plan (and any amendments) within 45 days of receipt, and shall either approve the annual plan or provide the operator with a list of deficiencies. The annual plan shall comply with the provisions of this subsection, and shall include the following:...	The 2014 Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan (Plan) was submitted to the County on 08/29/13 and was approved on 10/15/13. On 12/18/13, FM O&G submitted an amendment to the approved 2014 Plan to move the bottom hole a well and rename the well accordingly. This amendment was approved by DRP on 01/23/14.  The 2015 Plan was submitted to the County on 09/03/14 and was approved on 10/23/14.
E.26.c SA 1	1. Slant Drilling. a. Deep Zone Wells. b. Mid-Zone Wells. c. Shallow Wells. d. Supplement Review. e. Definitions f. Environmental Consideration. g. Non-interference.	Neither the 2014 or 2015 Drilling Plans included any Deep zone or Mid zone wells that would be subject to a supplement review.
E.26.d	Drill Rig Engines. All engines used for drilling and redrilling operations shall be operated by muffled internal-combustion engines or by electric motors.	Drill rig engines used at the oil field are properly muffled as required.
E.26.e	Fire Safety Regulations. All drilling, redrilling, and reworking shall be in conformance with applicable fire and safety regulations.	Fire and safety regulations and orderly drill site conditions are followed at all drilling, redrilling, reworking sites in the oil field.

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E.26.f SA 6	<p>E. 26.f: New Technology. Proven reasonable and feasible technological improvements which are capable of reducing the environmental impacts of drilling and redrilling shall be considered as they become, from time to time, available.</p> <p>SA 6: Clean Technology Assessment. The CSD requires PXP to consider proven reasonable and feasible technological improvements which are capable of reducing the environmental impacts of drilling and redrilling. (County Code section 22.44.142.E.26.f) The CSD also requires that the Annual Drilling Plan include a discussion of the latest equipment and techniques that are proposed for use as part of its drilling and redrilling program to reduce environmental impacts. (County Code section 22.44.142.E.26.c.ix) Pursuant thereto, PXP shall address in each Annual Drilling Plan the availability and feasibility of the use of natural gas-powered drill rigs or other technology capable of reducing environmental impacts, for the drilling of wells proposed in the Annual Drilling Plan (collectively "Clean Technology"). During the Periodic Review provided in 22.44.142 G.7, the County will evaluate such technology for brand new equipment that PXP intends to lease, acquire or otherwise use and require PXP to implement such technology to the extent the technology is feasible and available on a commercially reasonable basis.</p>	<p>New technology for reducing the environmental impacts of drilling and redrilling is discussed in the annual drilling plans required per E.26.c. The discussion includes an applicability overview of electric rigs, coil tubing rigs, diesel, electric rigs, and natural gas-electric rigs along with the potential feasibility of their use at the Inglewood Oil Field.</p>
E.26.g	<p>Derricks and Portable Masts. All derricks and portable masts used for drilling, redrilling, and reworking shall meet the standards and specifications of the American Petroleum Institute as they presently exist or as may be amended.</p>	<p>In 2014, all derricks and portable masts used for drilling, redrilling, and reworking met the standards and specifications of the American Petroleum Institute.</p>
E.26.h	<p>Equipment Removal. All drilling and redrilling equipment shall be removed from the site within 90 days following the completion of drilling or redrilling activities unless the equipment is to be used at the oil field within five days for drilling or redrilling operations.</p>	<p>In 2014, all drilling and redrilling equipment were removed from the site within 90 days following the completion of drilling or redrilling activities.</p>
E.26.i	<p>Drill Site Conditions. All drilling sites shall be maintained in a neat and orderly fashion.</p>	<p>In 2014, all drilling sites were maintained in a neat and orderly fashion.</p>
E.26.j	<p>Belt Guards. Belt guards shall be required over all drive belts on drilling, redrilling, and reworking equipment. Guarding shall be as required by Title 8 of the California Code of Regulations, section 6622, or as may be subsequently amended.</p>	<p>In 2014, belt guards were over all drive belts on drilling, redrilling, and reworking equipment as required by Title 8 of the California Code of Regulations, section 6622.</p>
E.27.a	<p>Limits on Processing Operations. Unless otherwise expressly required by DOGGR, the only processing operations permitted at the well site shall be the dehydration of oil and gas produced from the well; the storage, handling, recycling, and transportation of such materials; and those processing operations required for water injection purposes.</p>	<p>In 2014, the only processing that occurred at the oil field was associated with the dehydration of oil and gas; the storage, handling, recycling, and transportation of those materials; and water injection operations.</p>
E.27.b	<p>Refining. No refining shall be conducted within the oil field.</p>	<p>In 2014, no refining occurred within the oil field.</p>
E.27.c	<p>Well Pump Motors. All well pumping units shall be operated by electric motors.</p>	<p>In 2014, all well pump motors at the oil field were powered electrically.</p>
E.27.d	<p>Well Pumps. Downhole submersible pumps and low-profile pumping units for production wells must be used wherever feasible.</p>	<p>In 2014, downhole submersible pumps and low-profile pumping units for production wells were used wherever feasible.</p>
E.27.e	<p>Removal by Pipeline Only. All oil, gas, and other hydrocarbons produced from any well in the oil field shall be shipped and transported through pipelines, except in case of an emergency or when access to a pipeline becomes unavailable. Excluded from this requirement are propane and other related natural gas liquids that are in amounts in excess of what can be blended into the pipeline. Should any pipeline through which oil or gas is currently transported become unavailable for the safe transportation of said products due to maintenance problems with the pipeline, or lack of sufficient capacity within the pipeline to handle the volume of oil and gas needing transportation, or because the owner or operator of such pipeline elects to discontinue transporting oil or gas through such pipeline, then the operator shall within 180 days of the date the existing pipeline becomes unavailable, seek to acquire a private right of way or easement, or shall file an application for a right of way, easement, encroachment permit, or franchise for the construction of a replacement pipeline and shall diligently prosecute such application until such pipeline is completed. During any emergency situation, or during such time as any existing pipeline becomes unsafe or unavailable, oil and gas may be transported by truck until the emergency situation is resolved or until a replacement pipeline shall be permitted and constructed in compliance with all applicable laws and regulations.</p>	<p>In 2014, all oil, gas, and other hydrocarbons produced in the oil field were shipped and transported via pipelines, and all natural gas liquids were blended into the oil and transported by pipeline.</p>

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E.27.f	<p>Pipelines. The operator shall comply with the following provisions:</p> <ul style="list-style-type: none"> <li>i. New pipelines that remove oil or gas from the oil field shall be buried below the surface of the ground;</li> <li>ii. All pipelines which are not enclosed within a fence shall be placed underground or covered with materials approved by the fire chief. Said covers shall be maintained in a neat, orderly, and secure manner;</li> <li>iii. Any and all water or brine produced during pipeline construction shall either be injected in accordance with DOGGR requirements, or disposed of in accordance with other local, state or federal regulations;</li> <li>iv. New pipeline corridors shall be consolidated with existing pipelines or electrical transmission corridors where feasible; and</li> <li>v. Upon completion of pipeline construction, the site shall be restored to the approximate previous grade and condition.</li> </ul>	<p>No new pipelines that transport oil or gas from the oil field have been constructed since the adoption of the CSD. The oil field is completely fenced in with chain link fencing that meets the DOGGR requirements, thus all oil field pipelines are also enclosed by a fence. All water or brine generated at the oil field is injected in accordance with DOGGR requirements. Pipeline construction within the oil field is consolidated to the maximum feasible in existing pipeline routes and corridors.</p>
E.27.g	<p>Active Pipeline Plot Plan. The operator shall submit to the fire chief a plot plan depicting the approximate location of all active pipelines regulated by the United States Department of Transportation or California State Fire Marshall owned by the operator that are located outside the outer boundary line, including waste water, and trunk and gathering lines to transport oil or petroleum products. The plot plan shall be submitted within 30 days of the installation of any new pipelines or the relocation of an existing pipeline.</p>	<p>The active pipeline plot plan was submitted to the Fire Department on December 9, 2009 and has not been required to be updated to date.</p>
E.27.h	<p>Machinery Enclosures. The operator shall maintain enclosures around machinery with moving parts consisting of a fence, screening, or housing. Said enclosures shall be installed in compliance with Section 11.16.020, Title 11 of the County Code.</p>	<p>In 2014, all enclosures around machinery subject to this provision were maintained in compliance with Section 11.16.020, Title 11 of the County Code.</p>
E.27.i	<p>Opening Protections. The operator shall cap, close, or protect the openings in all oil wells, test holes, and similar excavation in compliance with Section 11.54.010, Title 11, of the County Code.</p>	<p>In 2014, all openings in all oil wells, test holes, and similar excavation in compliance were capped, closed, or protected in compliance with Section 11.54.010, Title 11, of the County Code.</p>
E.28.a	<p>a. DOGGR Regulations. The operator shall comply with all DOGGR regulations related to well reworking operations.</p>	<p>In 2014, all DOGGR regulations related to well reworking operations were complied with.</p>
E.28.b	<p>Number of Reworking Rigs. No more than eight reworking rigs shall be present within the oil field at any one time, unless an emergency condition requires additional Reworking rigs. This does not include equipment used for well maintenance or well abandonment.</p>	<p>In 2014, no more than eight reworking rigs were present on the oil field at any one time not including equipment used for well maintenance and well abandonment.</p>
E.28.c	<p>Hours of Operation. With exception of emergencies, well reworking operations shall not be allowed after 7:00 p.m. or before 7:00 a.m., nor on Sundays or legal holidays.</p>	<p>In 2014, Reworking rigs did not operate outside 7:00 am to 7:00 pm or on Sundays or legal holidays except in emergencies.</p>
E.28.d	<p>Specifications. Reworking rigs shall meet the standards and specifications of the American Petroleum Institute.</p>	<p>In 2014, all reworking rigs met the standards and specifications of the American Petroleum Institute.</p>
E.28.e	<p>Equipment Removal. Reworking rigs shall be removed from the oil field within seven days following the completion of reworking operations unless such rig will be used on another well at the oil field within five days.</p>	<p>In 2014, all reworking rigs were removed from the oil field within seven days following completion of the operations unless it was scheduled for use at another well within five days.</p>
E.29.a	<p>New Tank Specifications. All new tanks and appurtenances shall be designed, constructed, installed, and maintained in accordance with current County Fire Code, American Petroleum Institute, DOGGR, California Division of Industrial Safety, Environmental Protection Agency Standards, applicable provisions of Title 14 of the California Code of Regulations section 177 4, and applicable CalARP Program requirements.</p>	<p>In 2014, two replacement tanks were installed on the oil field. Both tanks were designed, constructed, installed and maintained in accordance with all applicable regulations cited in this provision.</p>
E.29.b	<p>Setbacks. No new storage Tank, excluding a replacement tank, shall be constructed closer than 500 feet from any developed area, or closer than 200 feet from a public road. No building shall be constructed within 50 feet of any oil storage tank.</p>	<p>The two tanks installed in 2014 were both replacement tanks. No new buildings were constructed within 50 feet of any oil storage tank.</p>
E.29.c	<p>Vapor Recovery. Oil, wash, and produced water tanks shall be vapor tight and shall be equipped with a vapor recovery system.</p>	<p>In 2014, all oil, wash and produced water tanks were vapor tight and equipped with a vapor recovery system.</p>

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E.29.d	Specifications for New Tank Piping, Valves, Fittings, and Connections. All new tank piping, valves, fittings, and connections including normal and emergency relief venting, shall be installed and maintained in accordance with current American Petroleum Institute standards to the satisfaction of SCAQMD and DOGGR.	In 2014, all equipment covered by this provision were installed and maintained in accordance with current API standards to the satisfaction of SCAQMD and DOGGR.
E.29.e	Detection of Tank Bottom Leaks. The operator shall design, implement, and comply with a program, approved by the fire chief, for controlling and detecting tank bottom leaks on all tanks at the oil field. The operator may use a combination of methods including but not limited to diversion walls, dikes, tank foundations of concrete or gravel, and a tank bottom leak detection system in compliance with Title 14 of the California Code and Regulations section 1773, or subsequently enacted state regulations regarding tank bottom leaks.	All tanks at the Inglewood Oil Field have a program to detect tank bottom leaks as approved by the Fire Department on 2/18/10 in the Tank Leak Detection and Containment Plan.
E.30	Well and Production Reporting. The operator shall deliver annual production reports to the director and the fire chief. The reports shall provide the following information: a. A copy of all DOGGR Forms 110 and 110B submitted during the previous 12 months. b. Number and mapped location of wells drilled or redrilled, including well identification numbers. c. Number and mapped location of water injection wells, including well identification numbers. d. Number and mapped location of idled wells, including well identification numbers and the date each well was idled. e. Number and mapped location of abandoned wells, including date each well was abandoned and/or re-abandoned. f. Any additional information requested by the director or the fire chief.	The 2014 well and production reporting was submitted to the DRP and Fire Chief on 02/09/15.
E.31	Idle Well Testing and Maintenance. The operator shall comply with Title 14 of the California Code of Regulations section 1723.9 regarding testing and maintenance of idle wells, or subsequently enacted state regulations regarding testing and maintenance of idle wells. The operator shall carry out all additional tests, remedial operations, and mitigation measures required by DOGGR if any idle wells do not meet the test standards.	In 2014, all required testing and maintenance of idle wells was carried out in accordance with all applicable regulations.
E.32	Abandoned Well Testing. The operator shall conduct annual hydrocarbon vapor testing of areas within the oil field that contain abandoned wells. The testing shall be done using a soil gas vapor probe, or another method approved by the director. The results of the testing shall be submitted to the director and DOGGR on an annual basis. Abandoned wells that are found to be leaking hydrocarbons that could affect health and safety shall be reported to the director and DOGGR within 24 hours of the abandoned well test. If directed by DOGGR, the operator shall re-abandon the well in accordance with DOGGR rules and regulations. If the test results for an abandoned well area are at or below the background levels for two consecutive years that area shall thereafter be tested every five years.	The 2014 abandoned well testing was submitted to the DRP and DOGGR on 06/30/14.
E.33	Well and Well Pad Abandonment. If DOGGR orders the operator to plug and abandon any wells on the oil field, the operator shall deliver to the fire department, on a timely basis, all notices of intent to plug and abandon a well that the operator files with DOGGR and shall commence promptly and proceed diligently with the plugging and abandonment operations in accordance with DOGGR rules and regulations and the terms of the DOGGR permit to plug and abandon the well. Well abandonment may commence once all necessary permits and approvals are obtained. If the well pad associated with the abandoned well does not contain other production, injection, or idle wells, and will not be used for future drilling, then the operator shall promptly abandon the well pad consistent with the following provisions: Closure of Sumps. The operator shall clean out all sumps, cellars, and ditches, and level and fill all sumps and depressions pursuant to DOGGR requirements. If sumps are lined with concrete, bottoms and walls shall be broken up and removed. Sumps shall be closed in accordance with Regional Water Quality Control Board and California Department of Toxic Substances Control requirements. b. Well Pad Site Cleanup. The operator shall leave the site entirely free of oil, rotary mud, oil-soaked earth, asphalt, tar, concrete, litter, debris, and other substances to the satisfaction of DOGGR and in compliance with federal requirements. c. Contaminated Materials. All contaminated soils and materials within the well pad boundaries shall be removed and treated or disposed of in accordance with all local, county, State, and federal regulations. d. Well Pad Revegetation. The Well pad shall be revegetated following the requirement of the native habitat restoration plan.	DOGGR has not ordered any wells to be plugged or abandoned pursuant to this requirement. The oil field does not contain any sumps and sumps are no longer used at the oil field. Existing well pads have been cleaned up but are not scheduled for abandonment or restoration so they may be re-used to avoid the impact of developing new well pad areas.

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E.34	County Request for Review of Well Status. The director may periodically review the status of the operator's wells and submit to DOGGR a list of wells the director believes should be plugged and abandoned as specified in Public Resources Code section 3206.5 or any subsequently enacted state law related to a local jurisdiction's right to request state-agency review of idle wells.	The County has not requested that DOGGR require the Operator to plug or abandon any wells pursuant to this provision.
E.35 SA 14	E.35: Reduced Throughput Triggering Review. When oil or gas throughput is less than 630 barrels per day, the director shall conduct a public hearing to determine if shut down of the oil field or other action are appropriate. SA 14: CSD Review Based On Reduced Production. When production drops to three percent of the estimated peak production of 21,000 barrels of oil per day, the County will review the CSD to consider whether modifications or closure of the Oil Field is necessary or appropriate or at such earlier date as the County determines appropriate.	The oil field has not reached the production levels that trigger this review and this provision has not been activated to date.
E.36	Abandonment Procedures. Within 180 days of permanent facility shut down, the operator shall submit an abandonment plan to DOGGR and submit to the director for review and approval a time line for facility removal, site assessment, and remediation as necessary. The operator shall begin abandonment of the site no later than 20 days after the director's approval of the timeline, and shall provide to the director quarterly updates on the abandonment process until such time as the oil field is abandoned and remediated. The operator shall post a performance bond to insure compliance with all provisions of this subsection and the operators and landowners shall continue to pay property taxes at the rates assessed during oil field operation until all site restoration work has been fully completed, as determined by the director.	The facility has not shut down; hence, this provision is not applicable to date.
F.1.a, b	Environmental Quality Assurance Program ("EQAP"). The operator shall comply with all provisions of an environmental quality assurance program that has been approved by the director. The following provisions relate to the EQAP: a. EQAP Requirements. The EQAP shall provide a detailed description of the steps the operator shall take to assure compliance with all provisions of this section, including but not limited to, all of the monitoring programs called for by this section. b. Annual EQAP Reports. Within 60 days following the end of each calendar year, the operator shall submit to the director an annual EQAP report that reviews the operator's compliance with the provisions of the EQAP over the previous year and addresses such other matters as may be requested by the director. The annual EQAP report shall include the following: i. A complete list and description of any and all instances where the provisions of the EQAP, or any of the monitoring programs referred to therein or in this section, were not fully and timely complied with, and an analysis how compliance with such provisions can be improved over the coming year. ii. Results and analyses of all data collection efforts conducted by the operator over the previous year pursuant to the provisions of this section.	This 2014 annual EQAP report was submitted on 02/27/15 in compliance with this policy.
F.1.c	EQAP Updates. The EQAP shall be updated as necessary and submitted to the director for approval along with the annual EQAP report. The EOAP updates shall be provided to the CAP and MACC for review and comment. Comments from the CAP and MACC, if timely received, shall be considered by the director before making a decision to approve the same. The director shall complete the review of EQAP updates as soon as practicable, and shall either approve the updated EOAP or provide the operator with a list of specific items that must be included in the EOAP prior to approval. The operator shall respond to any request for additional information within 30 days of receiving such request from the director, unless extended by the director.	The EQAP was approved by the County in February 2009 and was revised on August 25, 2009. No updates have been necessary to date.

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F.2	<p>Environmental Compliance Coordinator. The operator shall recommend and fund the environmental compliance coordinators. The number of environmental compliance coordinators shall be determined by the county and shall take into account the level of oil operations at the oil field. The environmental compliance coordinator(s) shall be approved by, and shall report to, the director. The responsibilities of the environmental compliance coordinator(s) shall be set forth in implementation guidelines that may be developed by the county for the oil field and shall generally include:</p> <p>a. On-site, day-to-day monitoring of construction or drilling and redrilling activities as determined by the director.</p> <p>b. Taking steps to ensure that the operator, and all employees, contractors, and other persons working in the oil field, have knowledge of, and are in compliance with all applicable provisions of this section.</p> <p>c. Evaluating the adequacy of drilling, redrilling, and construction impact mitigations, and proposing improvements to the operator or contractors and the county.</p> <p>d. Reporting responsibilities to the various county agencies with oversight responsibility at the oil field, as well as other agencies such as DOGGR, and SCAQMD.</p>	<p>An ECC position has been funded by the operator as required by this provision since the adoption of the CSD. The ECC site inspections are coordinated with oil field management to gain access to oil field staff, oil field contractors and for access to the oil field to check on the compliance provisions of the CSD. The ECC also participates in reviewing and commenting of all plans submitted by the Operator in compliance with the CSD.</p>
F.3.a	<p>Safety Inspection, Maintenance, and Quality Assurance Program ("SIMQAP"). The operator shall comply with all provisions of a safety inspection, maintenance, and quality assurance program that has been approved by the director and the fire chief.</p> <p>a. SIMQAP Requirements. The SIMQAP shall, at a minimum provide for:</p> <p>i. Inspection of construction techniques;</p> <p>ii. Regular maintenance and safety inspections;</p> <p>iii. Periodic safety audits;</p> <p>iv. Corrosion monitoring and leak detection; and</p> <p>v. Inspections of all trucks carrying hazardous and/or flammable material prior to loading.</p>	<p>The SIMQAP was approved on 4/13/11, is implemented and ongoing.</p>
F.3.b	<p>SIMQAP Updates. The operator shall periodically review and revise the SIMQAP to incorporate changes in procedures, and new safety and maintenance technologies and procedures. The operator shall make such revisions at least every five years, or more frequently, if the operator determines changes are necessary or if requested by the director or the fire chief. The operator shall submit SIMQAP updates to the director and the fire chief for their review and approval. The director shall complete the review of SIMQAP updates as soon as practicable, and shall either approve the updated SIMQAP or provide the operator with a list of specific items that must be included in the SIMQAP prior to approval. The operator shall respond to any request for additional information within 30 days of receiving such request from the director, unless extended by the director.</p>	<p>The SIMQAP was approved on 4/13/11. To date, no revisions to the SIMQAP have been necessary.</p>
F.3.c	<p>Worker Notification. The operator shall ensure that all persons working on the oil field comply with all provisions of the currently approved SIMQAP.</p>	<p>All persons working on the oil field in 2014 received SIMQAP training.</p>
F.3.d	<p>Inspections. The SIMQAP shall provide for involvement of county staff or the environmental compliance coordinator in all inspections required by this section.</p>	<p>The approved SIMQAP provides for the involvement of County staff or the ECC in all required inspections.</p>
F.4	<p>Annual Emergency Response Drills of the County and Culver City Fire Departments. The operator shall demonstrate the effectiveness of the emergency response plan by responding to one planned emergency response drill per year which shall be conducted in conjunction with the county and Culver City fire departments. Emergency response drills required by other agencies that involve the county and Culver City fire departments can be used to satisfy this provision. In addition, the operator shall demonstrate the effectiveness of the emergency response plan by responding to not more than two unannounced drills each year which may be called by the county fire department at the oil field. If critical operations are then underway at the oil field, the operator need not respond to a unannounced drill to the extent such a response would, as a result of such critical operations, create an undue risk of personal injury or property damage, but in such case the operator must promptly explain the nature of the critical operations, why response is not possible, and when the critical operations will be completed.</p>	<p>The 2014 emergency response drill was conducted on October 30, 2014. Representatives from both LA County and Culver City Fire Departments attended as well as representatives from the California Department of Fish and Wildlife.</p>



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F.5	<p>Noise Monitoring. The public health department shall retain an independent qualified acoustical engineer to monitor ambient noise levels in the areas surrounding the oil field as determined necessary by the director or the director of public health. The monitoring shall be conducted unannounced and within a time frame specified by the director or the director of public health. Should noise from the oil operations exceed the noise thresholds specified in this section, no new drilling or redrilling permits shall be issued by the county until the operator in consultation with the director and director of public health identifies the source of the noise and the operator takes the steps necessary to assure compliance with thresholds specified in this section. The results of all such monitoring shall be promptly posted on the oil field web site and provided to the CAP.</p>	<p>No exceedances of the noise regulations in the County Code or of the noise limits specified subsection E.5.a of the CSD have been reported to FM O&amp;G by the DPH.</p>
F.6	<p>Vibration Monitoring. The public health department shall retain an independent qualified acoustical engineer to monitor vibration in the areas surrounding the oil field as determined necessary by the director or the director of public health. The monitoring shall be conducted unannounced and within a time frame specified by the director or the director of public health. Should vibration from the oil operations exceed the vibration thresholds specified in this section, no new drilling or redrilling permits shall be issued by the county until the operator in consultation with the director and director of public health identifies the source of the vibration and the operator takes the steps necessary to assure compliance with thresholds specified in this section. The results of all such monitoring shall be promptly posted on the oil field web site and provided to the CAP. A telephone number by which persons may contact the operator at all times to register complaints regarding oil operations shall be posted in the main entrance sign to the facility and included in the annual newsletter required by subsections J.2.b and on the oil field web site required by subsection J.2.c.</p>	<p>No exceedances of the vibration criteria specified in subsection E.6. of the CSD have been reported to FM O&amp;G by DPH.</p>
F.7	<p>Complaints. All complaints related to oil operations received by the operator shall be reported on the same business day to the environmental compliance coordinator and to the director. In addition, the operator shall maintain a written log of all complaints and provide that log to the director, the MACC, and CAP on a quarterly basis. Depending upon the nature of the complaint, the operator shall report the complaint to the SCAQMD, DOGGR, and any other appropriate agencies with oversight authority regarding the complaint at issue. If the complaint is received after normal business hours, it shall be reported to the environmental compliance coordinator and the agencies at the opening of the next business day.</p>	<p>All complaints received were reported to the ECC, DRP as well as other appropriate agencies with oversight of the matter in compliance with the timing of this policy. Quarterly complaint logs were submitted to the ECC and the DRP quarterly and are posted at <a href="http://www.inglewoodoilfield.com">www.inglewoodoilfield.com</a>.</p>
G.1	<p>Costs of Implementing Monitoring and Enforcing Conditions. The operator shall be fully responsible for all reasonable costs and expenses incurred by the county or any county contractors, consultants, or employees, in implementing, monitoring, or enforcing this section, including but not limited to, costs for permitting, permit condition implementation, mitigation monitoring, reviewing and verifying information contained in reports, undertaking studies, research and inspections, administrative support, and including the fully burdened cost of time spent by county employees on such matters.</p>	<p>FM O&amp;G has made timely payments on all CSD monitoring and enforcement costs to the County through the draw down account required by CSD Provision G.2. All costs from the implementation of the CSD, permit processing, mitigation monitoring, compliance report research, review and verification, inspections, and administrative costs have been paid by the FM O&amp;G from this account.</p>
G.2	<p>Draw-Down Account. The operator shall maintain a draw-down account with the department of regional planning from which actual costs will be billed and deducted for the purpose of defraying the expenses involved in the county's review and verification of the information contained in any required reports and any other activities of the county, including but not limited to, enforcement, permitting, inspection, coordination of compliance monitoring, administrative support, technical studies, and the hiring of independent consultants. The initial amount to be deposited by the operator shall be \$500,000. In the first year, if withdrawals from the account have reduced its balance to less than 50 percent of the amount of the initial deposit (\$250,000), the operator shall deposit \$50,000 in supplemental funds within 30 business days of notification. After the first year, if the balance in the draw-down account is reduced at any time to \$50,000, the operator shall deposit \$50,000 in supplemental funds on each occasion that the account is reduced to \$50,000 or less within 30 business days of notification. There is no limit to the number of supplemental deposits that may be required. At the discretion of the operator, the amount of an initial or supplemental deposit may exceed the minimum amounts specified in this subsection. The director may, from time to time, increase the minimum \$50,000 figure to account for inflation or the county's experience in obtaining funds from the account.</p>	<p>The draw-down account has been maintained at or above the \$50,000 balance as required by this requirement. The last deposit to the account occurred on 5/1/14.</p>

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G.3	Indemnification. The operator shall enter into an agreement with the county to indemnify and hold harmless the county, its elected and appointed officials, agents, officers, and employees from any claim, action, or proceeding for damages arising from its oil operations, including water, air or soil contamination, health impacts, or loss of property value during the oil operations, well abandonment, and post-abandonment activities with terms approved by, and in a form acceptable to, the CEO.	The required agreement was documented in a letter signed by the operator and the County dated November 12, 2009, the agreement is on file with the County.
G.4	Insurance Requirements. Within 90 days following the effective date of the ordinance creating this section or such later time as may be approved by the director for good cause shown, and without limiting the operator's indemnification of the county as required in the preceding subsection, the operator shall provide evidence of insurance coverage that meets county requirements as required and approved by the CEO including identifying the county and its elected and appointed officers and employees as additional insureds. Such coverage shall be maintained so long as oil operations are conducted within the district and until such time as all abandonment requirements are met and certified by the appropriate local, state, and federal agencies. Such insurance coverage shall include but is not necessarily limited to the following: general liability, auto liability, professional liability, and environmental impairment liability coverage insuring clean-up costs and endorsing for 'Sudden and Accidental contamination or pollution. Such coverage shall be in an amount sufficient to meet all applicable state and federal requirements, with no special limitations. At the operator's request and only with county approval by the CEO, the operator may self-insure all or any part of the above coverage obligations in lieu of purchasing commercial coverage. These insurance requirements shall be in addition to all other indemnification, insurance and performance security required by federal, state, and local regulations and permits.	PXP, the operator at the time of CSD adoption, provided the County with an insurance policy meeting the liability and environmental impairment liability requirements of this provision on January 18, 2010. FM O&G, updated this insurance to reflect the change in operator on June 25, 2013.
G.5.a	Performance Bond. Prior to issuance of the first drilling or redrilling permit pursuant to this section, the operator shall provide to the department of regional planning a faithful performance bond or financial instrument in the sum to be determined by the CEO, payable to the county and executed by a corporate surety acceptable to the county and licensed to transact business as a surety in the state of California. Such bond shall be conditioned upon the faithful performance by the operator of duties related to well abandonment, site restoration, and environmental cleanup and shall be in a format and include terms approved by the CEO.	PXP, the operator at the time of CSD adoption, provided the County with a performance bond issued by an acceptable corporate surety licensed to transact business in the state of California on September 29, 2009. FM O&G, updated this bond to reflect the change of operator on June 25, 2013.
G.5.b	Change of Operator. The performance bond shall continue in force for one year following any sale, transfer, assignment, or other change of operator of the oil field, or of the current operator's termination of activities at the oil field. The county may release said bond prior to the end of the one-year period upon satisfaction by the operator of all its obligations. Notwithstanding the foregoing, the performance bond shall not be terminated or released upon the sale, transfer, assignment, or other change of operator until the new operator has delivered a replacement bond complying with the provisions of this subsection G.	There was no change of operator in 2014.
G.5.c	Funding Options. At its sole option, the county may accept certificates of deposit, cash deposits, or U.S. government securities in lieu of commercial bonds to meet the above bonding requirements on terms approved by the CEO.	This provision is not applicable since FM O&G provided a performance bond in accordance with G.5.a.
G.6	Other Obligations. The insurance, indemnification, and performance security requirements in subsections G.3, G.4, and G.5 shall be in addition to all other indemnification, insurance, and performance security required by federal, state and local regulations, and permits.	The condition is administrative in its intent and is fully implemented.

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G.7	<p>Periodic Review. The county shall conduct a comprehensive review of the provisions of this section at least every five years to determine if the provisions of this section are adequately protecting the health, safety, and general welfare. Such reviews shall, among other things, consider whether additional provisions should be added, appended, or removed. One of the main goals of the periodic review shall be to evaluate if proven technological advances that would further reduce impacts of oil operations on neighboring land uses should be incorporated into the provisions of this section.</p> <p>a. Review Requirements. Each review shall include a report by a hearing officer designated by the director, which shall be prepared after public notice and an opportunity for public comment. The report shall include a comprehensive analysis of the effectiveness of this section, and shall review and consider enforcement activity, operational records, and any other issues relating to oil operations. The report, at the option of the county, may include a survey of residents near the oil field regarding noise, odors, vibrations, and other issues requested by the director of public health. A draft of the report shall be provided to the CAP and the operator for review and comment. All comments on the draft report from the CAP and the operator shall be submitted to the hearing officer in writing, and will be considered, if timely received, before the report is finalized. The final report by the hearing officer shall include a recommendation as to whether the director should prepare proposed amendment to this section for submission to the board of supervisors.</p> <p>b. Early Reviews. At the discretion of the director, reviews of this section may be conducted more frequently than every five years. Without limiting such discretion, the director shall consider whether an early review should be undertaken if more than three material violations occur within any 12-month period.</p> <p>c. Initial Review. The initial review shall occur no sooner than three years and no later than five years after the effective date of the ordinance establishing this section unless the director determines that such initial annual review shall occur at an earlier time pursuant to subsection b, above.</p>	<p>The County released a five year review report in February 2014. The draft report was circulated for review and comment to both the CAP, members of the public, other agencies and the operator. Comments on the draft report were considered in the preparation of the final draft. The report was prepared consistent with the five year time frame requirement stipulated in CSD Provision G.7.c.</p>
G.8	<p>Multiple Agency Coordination Committee ("MACC"). A MACC shall be established to coordinate activities and communications between the various agencies with regulatory authority over the oil operations within the district. While each agency will continue to make its own decisions with regard to their respective areas of authority, the MACC will allow for collection and analysis of data and for discussion of both strategic evaluations and enforcement actions taken by the various agencies at the oil field.</p> <p>a. MACC Members. The director shall establish a MACC that includes representatives from the following agencies: the county department of regional planning, the county fire department, the county department of public works, and the county department of public health. The SCAQMD, the Regional Water Quality Control Board, DOGGR, and Culver City fire department shall be invited to appoint a representative from their agency as a member of the MACC.</p> <p>b. MACC Chair. The director or his designee shall chair the MACC meetings and shall coordinate all MACC activities including scheduling and keeping minutes of MACC meetings.</p> <p>c. MACC Meetings. The MACC shall determine its meeting schedule.</p> <p>d. Documents Provided to the MACC. Copies of all monitoring and compliance reports, plans, and other documents that are requirements of this section shall be submitted to the MACC.</p>	<p>A MACC was established in 2009, and the MACC conducts periodic meetings. All monitoring and compliance reports are provided to the MACC.</p>
G.9	<p>Related County Code Provisions. The county code contains a number of provisions related to oil wells and oil field operations. Where the regulations of this section differ from any other provisions in the county code, these regulations shall supersede unless the contrary provisions are mandated by state law.</p>	<p>The provision is a standard County requirement to clarify jurisdiction on similar code and regulations.</p>

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H.1 SA 4	<p>H.1: Director's Review Required. The operator shall apply for and receive approval of a director's review pursuant to the provisions of Part 12 of Chapter 22.56 prior to any new drilling and redrilling. New drilling and redrilling approved through a director's review procedure shall be limited to no more than 53 wells per year, with the maximum number of newly drilled wells of that total, limited to 45 per year, except that during the first year following the effective date of the ordinance establishing this section, new drilling and redrilling shall be limited to no more than 24 wells. Approval through director's review for drilling new wells shall be limited to 600 wells over 20 years, beginning on the effective date of this ordinance. Drilling and redrilling shall be planned to avoid over concentration of such activities in one area in any one year, if near developed areas. The director's review procedures shall also apply to emergency actions determined by the director as necessary to prevent an imminent hazard, or to other immediate measures required for the purposes of protecting health and safety. No new permits for drilling or redrilling shall be approved by the director unless the subject wells have been approved as part of an annual drilling plan as described in subsection E.26.c. Approval shall not be granted until copies of all related permits have been submitted to the director; other permits include, but are not limited to, the permits required by DOGGR, the county fire department; the county department of public works, the county sanitation district, RWQCB, SCAQMD, and other pertinent agencies identified by the director.</p>	<p>All wells drilled or re-drilled in 2014 received DRP Site Plan approvals prior to drilling of the wells, which included proof of applicable permits from DOGGR and/or the LA County Fire Department. All wells were included in the 2014 Drilling Plan.</p>																											
H.1 SA 4	<p>SA 4: Number of wells. Notwithstanding the aggregate and annual well-drilling limits in the CSD, PXP shall comply with the following limits:</p> <p>a. Notwithstanding Section 22.44.142.H of the CSD, no more than 500 new wells (inclusive of Bonus Wells and wells drilled since approval of CSD) shall be drilled pursuant to the CSD (hereinafter "Director's Review") through October 1, 2028, or during the remaining life of the CSD, whichever is later.</p> <p>b. Until such time as PXP has drilled or redrilled 50 wells since the adoption of the CSD, or 24 months from the date of this Agreement, whichever is sooner ("Time Period One"), no more than 30 wells may be drilled or re-drilled in any calendar year pursuant to a Director's Review as set forth in the CSD (hereinafter Director's Review). At the end of Time Period One, and if the County determines, pursuant to its review of the CSD by the Director of Regional Planning, that the CSD has been effective in protecting the health, safety, and general welfare of the public, thereafter (the "Full Operational Period") no more than 35 wells may be drilled or re-drilled in the calendar year pursuant to Director's Review.</p> <p>c. In Time Period One, for each well abandoned within 800 feet of any Developed Area (the "800-foot zone") by PXP since adoption of the CSD and in full compliance with the California Department of Conservation's Division of Oil, Gas and Geothermal Resources ("DOGGR") standards for abandonment at the time of abandonment, PXP may drill two additional new wells outside of the 800-foot zone (hereinafter "Bonus Wells"), up to a maximum of 45 drilled and redrilled wells (30 wells plus 15 Bonus Wells) in any calendar year within Time Period One pursuant to Director's Review and subject to review and approval in the Annual Drilling Plan. Subject to the annual and aggregate limits on number of wells, Bonus Wells earned by abandonment may be drilled at any time during the life of the CSD.</p> <p>d. In the Full Operational Period, for each well abandoned within the 800-foot zone, PXP may drill two additional new wells outside the 800-foot zone up to a maximum of 53 drilled and re-drilled wells (35 wells plus 18 Bonus Wells) in that year pursuant to Director's Review and subject to review and approval in the Annual Drilling Plan. Subject to the aggregate and annual limits on number of wells, Bonus Wells earned by abandonment may be drilled at any time during the life of the CSD.</p> <p>e. The Developed Area as used in the CSD with respect to the 400-foot buffer zone (Section 22.44.142.E.) shall remain unchanged (static or fixed) from what it was determined to be on the effective date of the CSD.</p>	<p>Since inception of the CSD and following the installation of 50 new wells, the Settlement Agreement allows FM O&amp;G to apply to the County for approval to install up to 35 new wells per year. FM O&amp;G's predecessor applied for this well increase on October 10, 2011 and was granted approval by the County on December 12, 2011.</p> <p>Since inception of the CSD through June 30, 2014, 127 wells have been drilled and 32 wells have been abandoned; of which 20 were within 800 feet of Developed Areas.</p> <table border="1" data-bbox="2069 1260 2666 1588"> <thead> <tr> <th colspan="3">Number of Wells Drilled Since Inception of the CSD</th> </tr> <tr> <th>YEAR</th> <th>NUMBER OF WELLS</th> <th>BONUS WELLS USED</th> </tr> </thead> <tbody> <tr> <td>2009</td> <td>0</td> <td>0</td> </tr> <tr> <td>2010</td> <td>19</td> <td>0</td> </tr> <tr> <td>2011</td> <td>40</td> <td>5</td> </tr> <tr> <td>2012</td> <td>20</td> <td>0</td> </tr> <tr> <td>2013</td> <td>30</td> <td>0</td> </tr> <tr> <td>2014</td> <td>18</td> <td>0</td> </tr> <tr> <td><b>Total</b></td> <td><b>127</b></td> <td><b>5</b></td> </tr> </tbody> </table>	Number of Wells Drilled Since Inception of the CSD			YEAR	NUMBER OF WELLS	BONUS WELLS USED	2009	0	0	2010	19	0	2011	40	5	2012	20	0	2013	30	0	2014	18	0	<b>Total</b>	<b>127</b>	<b>5</b>
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H.2 - 3	<p>H.2: Conditional Use Permit Required. Provided a conditional use permit has first been obtained as provided in Part 1 of Chapter 22.56, and while such permit is in full force and effect in conformity with the conditions of such permit, the following uses may be established:</p> <ul style="list-style-type: none"> <li>a. Drilling or redrilling that exceeds the maximum number allowed pursuant to a director's Review;</li> <li>b. Steam drive plant; and</li> <li>c. New tanks with a capacity of greater than 5,000 barrels.</li> </ul> <p>H.3: Conditional Use Permit Requirements. For those uses requiring a conditional use permit, in addition to the requirements of Part 1 of Chapter 22.56, the applicant shall substantiate to the satisfaction of the hearing officer that:</p> <ul style="list-style-type: none"> <li>a. The requested use is in compliance with the provisions of this section; and</li> <li>b. All reasonable measures were taken to reduce and minimize potential impacts from the proposed operation.</li> </ul>	No conditional use permits have been applied for/obtained.
H.4	Application Where Violation Exists. No application required pursuant to this section shall be accepted for processing or approved where any existing use in the district is being maintained or operated by the operator or its agents in violation of any material provision of this title.	As mentioned in the discussion for E.25, the County DRP issued a violation on 10/22/14. Within the DRP notice of violation, it was acknowledged that the violation had already been cured as verified by the LACFD on 9/17/14. Further, this violation was not a material violation of the CSD. As such, no applications were denied for processing or approval.
I.1	<p>Civil Penalties and Performance Security. The operator shall be subject to a penalty for violation of any requirement of this section as determined by, and at the discretion of, the director in an amount not less than \$1,000 or more than \$1 0,000 per day per violation, but in no event, in an amount beyond that authorized by state law. For this purpose, the operator shall deposit the sum of \$100,000 in an interest-bearing trust fund with the department of regional planning within 30 days following the effective date of this section, to establish a draw-down account. A written notice of violation and the associated penalty will be sent to the operator in the event of a violation. If the noted violation is not corrected to the satisfaction of the director within the time period set forth in the notice of violation, the penalty amount cited in the notice of violation will be deducted from the account. If the violation is corrected within the time period set forth in the notice of violation, but recurs any time within a six-month period, the penalty will be deducted from the account upon each recurrence and the operator will be notified of such deduction. Once the deposit has been depleted by 50 percent of the initial amount (\$50,000), the operator shall deposit additional funds sufficient to bring the balance up to the amount of the initial deposit (\$1 00,000) within 10 business days of notification. There is no limit to the number of supplemental deposits that may be required while the operator conducts oil operations within the district. If the operator is dissatisfied with the action of the director, the operator may file an appeal with the hearing officer within 15 days after the date which notice is mailed. Upon receiving a notice of appeal, the hearing officer shall take one of the following actions.</p> <ul style="list-style-type: none"> <li>a. Affirm the action of the director;</li> <li>b. Refer the matter back to the director for further review with or without instructions; or</li> <li>c. Set the matter for public hearing and after hearing, affirm, modify, or reverse the action of the director.</li> </ul> <p>The decision of the hearing officer shall be final.</p>	On 12/23/08, \$100,000 was deposited with the County in the interest-bearing trust fund required by this provision. FM O&G was not subject to any fees described in this provision; hence, the balance of this account has not changed with the exception of interest accumulation.
I.2	Access to Records and Facilities. As to any condition which requires for its effective enforcement the inspection of records or facilities by the county or its agents, the operator shall make such records available or provide access to such facilities upon reasonable notice from the county. The county agrees to keep such information confidential where required or permitted by law and requested by the operator in writing.	FM O&G has made records and facilities available for inspection by the County and its agents.

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I.3	Right of Entry. Any officer or employee of the county of Los Angeles, or his or her duly appointed representative, whose duties require the inspection of the oil field premises shall have the right and privilege at all reasonable times, to enter upon any premises upon or from which any oil operations are being conducted for which any permit is required under this section, for the purpose of making any of the inspections pursuant to this section, or in any other ordinance of the county, or for any other lawful purpose, but for safety reasons, shall be accompanied by the operator or a designee of the operator and shall wear all appropriate personal protection equipment in accordance with the operator's established health and safety policies.	FM O&G has made the oil field open to inspection.
J.1	Community Advisory Panel ("CAP"). A community advisory panel shall be established by the director to foster communication about ongoing operations at the oil field and to allow the community representatives to provide input to the county and the operator. a. CAP Members. The CAP may include representatives of the county, the city of Los Angeles, the city of Culver City, West Los Angeles College, the operator, the landowners, and each of the major neighborhoods surrounding the oil field (including Ladera Heights, Windsor Hills, Oak Park, View Park, Culver Crest, Blair Hills, and Raintree). The operator and each of the governmental entities previously referred to may each designate a representative to the CAP. Each landowner and neighborhood organization of the surrounding communities may submit a nomination to the director for appointment to the CAP. Where there is no neighborhood organization, a community resident may make a request to the director to be appointed to the CAP. School districts with schools in the vicinity of the oil field and the lessors may make a request to the director to have a representative appointed to the CAP. b. CAP Meetings. The CAP shall determine its meeting schedule. c. Documents Provided to the CAP. A notice of availability of all monitoring and compliance reports and results, all plans, audits and studies, and any other available documents that are required by this section shall be submitted to the CAP promptly after they are prepared or otherwise available. Copies of these reports, documents, and other items shall be provided to CAP members upon request except to the extent information therein may not be legally disclosed. Prior to each CAP meeting, the county shall provide to the CAP a list of all violations of the provisions of this section that have occurred since the last CAP meeting.	Documentation made available to the CAP is posted on the Inglewood Oil Field website required/described in J.2.c.
J.2.a	Community Meetings. The operator shall hold community meetings on an annual basis to provide updates on oil operations.	The 2014 annual meeting was held on 11/18/2014.
J.2.b	Newsletter. The Operator shall publish an informational newsletter annually, which shall contain updated information on oil operations including drilling, redrilling, maintenance, repair, and reworking activities and all recently granted conditional use permits or applications filed for conditional use permits for the oil field. The newsletter shall be mailed by the operator to all owners of property located within 1,000 feet of the outer boundary line; all owners of property within 1,000 feet of the perimeter of the district as shown in the records of the county assessor's office; to any person or entity who has filed a written request therefore with the director; and to neighboring cities. The operator shall also make these newsletters available on the oil field web site. The oil field web site address shall be publicized in each newsletter.	The sixth edition of the newsletter was mailed out and posted on 10/20/14.
J.2.c	Oil Field Web Site. The operator shall maintain and update on a regular basis an oil field web site that shall include information on oil operations at the oil field, including drilling and production activities. All monitoring and compliance reports and results, plans, audits and studies, and any other available documents that are required by this section (except to the extent they contain information that may not legally be disclosed) shall be promptly posted on the Oil Field Web Site in pdf format.	FM O&G maintains the <a href="http://www.inglewoodoilfield.com">www.inglewoodoilfield.com</a> website, which includes information on the history and future of the oil field, oil field operations, operational plans, compliance plans, community and environmental sections, and information on the CSD. The web site contains over 100 documents related to operational and compliance information with the documentation posted in pdf format as required by this policy. The web site also provides contact information and includes an interactive email system to allow for direct input to FM O&G and for registering for email updates on oil field activities.

**Freeport-McMoRan Oil Gas  
Inglewood Oil Field  
2014 Environmental Quality Assurance Program (EQAP) Report**

CSD Section/ Plan	CSD Language	Compliance Description
J.3	<p>Ombudsperson. The operator shall designate employees or authorized agents to serve as ombudspersons to respond to questions and concerns concerning the oil operations. Each ombudsperson shall be familiar with all the provisions of this section and all conditions of approval related to permits and approvals issued by the county or the State of California. It shall be the further responsibility of the ombudsperson to facilitate, to the extent feasible, the prompt resolution of any issues that may arise relating to the above-stated matters or the impacts of the oil operations. The name, title, email address, and telephone number of the ombudsperson shall be posted on the oil field web site, prominently displayed in the newsletter, distributed twice per year to the CAP and MACC, and provided to any other persons requesting such information. An ombudsperson shall be available at all times, and shall respond within one hour after an initial call. An ombudsperson shall also meet at reasonable times with interested parties in an attempt to resolve issues related to oil operations. An ombudsperson shall have authority to initiate a response on behalf of the operator in all foreseeable matters. The operator shall be required to maintain a written log of all calls to the ombudspersons registering complaints or concerns regarding oil operations or other matters. The log shall include the complainant's name, date, time, phone number, nature of complaint, and the response or resolution offered. A copy of the log shall be provided to the director, the MACC, and the CAP on a quarterly basis.</p>	<p>The ombudsperson system has been in place since the adoption of the CSD and serves as primary contact between FM O&amp;G and the community. The ombudsperson contact information is included in the annual newsletters and in the agendas for CAP meetings. In addition to the ombudsperson, the oil field maintains four staff members on an on-call basis to coordinate and respond to calls from the public or regulatory agencies regarding oil field operations. FM O&amp;G maintains a complaint log summarizing all calls made to the ombudsperson as required by this policy.</p>
Section K	<p>Modification of Development Standards.</p>	<p>No modifications to development standards has been applied for.</p>
Section L	<p>Implementation Provisions. This subsection identifies the various implementation plans and other requirements for initial compliance with this CSD and the time frames therefor. Except as identified below, the provisions of this section shall be complied with on the effective date of the ordinance establishing this CSD. As used in this subsection, "effective date" shall mean 30 days after the board of supervisors adopts the ordinance establishing this CSD. As soon as possible after the effective date, the department of regional planning shall develop an overall implementation plan specifying the required contents or measures for each of the plans set forth below, including the inclusion of those appropriate mitigation measures indicated as necessary by the Final Environmental Impact Report for the Baldwin Hills Community Standards District to reduce environmental impacts to less than significant levels in cases where impacts can be so reduced.</p>	<p>This subsection of the CSD lists the various implementation plans and other stipulations required for initial compliance along with a submittal schedule for the subject compliance. The schedule requirements for the plan and compliance submittals required under this provision range from 30 days to two years following the effective date of the CSD (October 28, 2008). All plans and initial requirements of this CSD subsection were completed; therefore, this requirement is no longer applicable.</p>
SA 5	<p>Health Assessment and Environmental Justice Study. The County shall complete a Community Health Assessment of the communities surrounding the Oil Field which shall include an Environmental Justice component by June 2012 and ensure additional assessments are completed every five to seven years throughout the life of the CSD. In future Community Health Assessments, the County Department of Public Health ("Public Health") shall review other agencies' reports regarding air quality, water quality and seismic data, where feasible, in its assessment. Public Health will analyze the information by socio-economic and demographic data to accommodate and reflect an Environmental Justice component. The Community Health Assessment shall include, but not be limited to, an analysis of cancer rates, mortality rates, birth outcomes and a survey of other pertinent health indicators. The County will consult with the CAP and the Health Working Group regarding the Community Health Assessment and consider reasonable comments by the CAP and the Health Working Group. Public Health will comply with all applicable state and federal requirements including Title VI of the Civil Rights Act of 1964 and corresponding regulations, and California Government Code Section 11135 and corresponding regulations.</p>	<p>This is a County action that was completed in July 2012.</p>
SA 7	<p>Electrical Distribution Study. The County will propose to Southern California Edison ("SCE") and the Los Angeles Department of Water and Power ("DWP") that a study be conducted in cooperation with SCE, DWP, the County and PXP regarding opportunities to streamline and consolidate electrical lines distributed throughout the Oil Field and that SCE and DWP each fund one-fourth of the cost of such study. PXP will fund one fourth of the cost of any such study. The County will fund one-fourth of the cost of any such study.</p>	<p>This is a County action, and it was reported that both SCE and DWP declined to participate with respect to funding the study.</p>

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CSD Section/ Plan	CSD Language	Compliance Description
SA 8	Air Quality Monitoring. Supplemental to the air monitoring required by the CSD, the County will develop and implement an air quality monitoring plan that takes into consideration review and comments from Petitioners, interested stakeholders and the public. Such air monitoring shall be designed to assess the risk of both acute and chronic exposure to air contaminants from Oil Field operations, and endeavor to determine and distinguish the source of emissions, to the extent feasible, using available and affordable monitoring technology. Such air monitoring may be performed by SCAQMD, or an independent qualified consultant selected by County, and shall be commenced within 12 months of the date of this Agreement. The protocol for the air monitoring plan shall be peer reviewed prior to commencement. The plan shall be completed, and a peer reviewed report issued, within 12 to 24 months after commencement. The County commits to spending up to \$250,000 of its own funds toward implementing the plan and shall use reasonable efforts to seek additional funding sources, if necessary, to implement the plan. PXP shall reasonably cooperate with SCAQMD, the County and/or the independent consultant regarding any and all air monitoring related to the Oil Field.	This is a County action that was completed in February 2015.
SA 9	Back-Up Flare. The CSD (County Code section 22.44.142.L.5.b) allows PXP to maintain its existing gas plant flare as back-up equipment at the facility's gas plant after a new flare is permitted and installed. PXP and the County agree that this provision of the CSD allows only one gas plant flare to be operated at one time at the Oil Field. PXP shall comply with said limitation of only one gas plant flare operating at one time at the Oil Field. PXP shall install and have operational the new flare within 180 days of receiving the SCAQMD permit or at such later date as approved by the Director of Regional Planning for good cause shown.	Installation of the new gas plant back-up flare was completed in 2012. The old gas plant flare remains and is maintained as a back up equipment as allowed for by CSD Provision L.5.b and the Settlement Agreement. FM O&G has complied with the requirement that only one flare be in operation at one time at the oil field.
SA 10	Well Plugs. DOGGR requires oil field operators to utilize a minimum 25-foot cement surface plug at the top of a well when abandoning any such well pursuant to Title 14 of the California Code of Regulations section 1723.5. To augment this requirement, for all wells abandoned at the Oil Field from the date of this Agreement, PXP shall utilize a total of 150-foot cement surface plug.	FM O&G complies with the 150 foot cement plug requirement for abandoned wells.
SA 13	Fracking Study. PXP shall pay for an independent consultant to conduct a study of the feasibility and potential impacts (including impacts to groundwater and subsidence) of the types of fracturing operations PXP may conduct in the Oil Field. The study will also consider PXP's historic and current use of gravel packing. Such study will be completed within twelve (12) months of the date of this Agreement. Such study and all the back-up information for such study shall be provided to a qualified peer reviewer selected by the County and PXP, who shall review the study, back-up materials, and conclusions for completeness and accuracy. PXP must provide the independent expert with all materials requested and reasonably necessary for an accurate and verifiable study. The peer reviewer will be provided with access to all the data and materials provided to the independent expert. The peer reviewer shall agree to keep all proprietary information confidential. If the peer reviewer determines that the study is materially inadequate, incomplete or inaccurate, it shall so advise PXP's consultant who will complete the study as reasonably recommended by the peer reviewer and provide the revised study to the peer reviewer within 90 days. Upon acceptance by the peer reviewer, the study and all supporting material, including comments by the peer reviewer, shall be forwarded to the County, DOGGR, the Regional Water Quality Control Board ("R WQCB"), CAP and Petitioners and be available to the public, with any proprietary information redacted.	The Hydraulic Fracturing Study – Inglewood Oil Field was completed in July 2012 with the final report dated October 10, 2012 consistent with the requirements of the Settlement Agreement. The report is available to the public on the Inglewood Oil Field web site.
SA 15	CSD Provisions. The CSD and all of its standards and requirements remain in full force and effect except to the extent that PXP has agreed to be limited by stricter or more rigorous controls or standards as reflected in this Agreement. Nothing herein shall limit or abrogate the County's discretion in amending the CSD, or other action pursuant to the County's legislative or police powers, to impose more restrictive requirements. This Agreement neither establishes nor abrogates any vested rights to drill new wells in the Oil Field. The County will provide written guidance on the additional limits and controls regarding operation of the Oil Field which are required by this Agreement to County staff and departments responsible for implementing the CSD and enforcing the CSD, and any other personnel the County deems necessary. The County shall recirculate this written guidance on an annual basis.	The requirements of the CSD and the Settlement Agreement remain in full effect. The County released the written guidance required by this provision via the Periodic Review report as described in CSD provision G.7 and a Settlement Agreement 2014 Compliance Report dated 12/8/14.



#	CSD Section/ Plan	CSD Language	Compliance Description
1	E.1.a G.7 (2015)	E.1.a: Community Alert Notification System ("CAN"). The operator shall maintain and test on an annual basis a CAN for automatic notification of area residences and businesses in the event of an emergency arising at the oil field that could require residents or inhabitants to take shelter, evacuate, or take other protective actions. G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "the E.1.a annual Community Alert Notification (CAN) tests include interested residents."	The CAN is maintained and was tested on 12/10/15. Interested residents were included in this test pursuant to the G.7/Final 2015 Periodic Review Final Report recommendation on this provision.
2	E.1.b	Spill Containment Response Training. The operator shall conduct annual spill containment response training and shall at all times have available, on-site, sufficient and properly maintained equipment and/or facilities so that a spill of the entire contents from the largest oil tank on the oil field can be responded to and contained in a timely manner to reduce the likelihood that the spill reaches a catch basin.	The annual spill containment response training occurred on 02/10/15.
3	E.1.c	Emergency Response Plan ("ERP"). The operator shall at all times maintain and fully implement and comply with all provisions of an emergency response plan and shall further ensure that the then current ERP satisfies all rules and regulations of the United States Environmental Protection Agency and California Code of Regulations relating to emergency action plans and spill prevention control and countermeasure plans, as well as the rules, regulations, and requirements of the California Office of Spill Prevention and Response. The ERP shall also satisfy the rules and regulations of the United States Department of Transportation relating to onshore pipeline spills.	FM O&G maintains, fully implements and complies with an ERP that is in compliance with all applicable rules and regulations of agencies with oversight of the ERP.
4	E.2.a	Emission Offsets. The operator shall obtain emission offsets or RECLAIM credits as defined and required by SCAQMD Regulations for all new or modified emission sources that require a new or modified SCAQMD permit.	No credits were needed in 2015.
5	E.2.c	Odor Minimization. At all times the operator shall comply with the provisions of an odor minimization plan that has been approved by the director. The odor minimization plan shall include any measures requested by the director. The plan shall provide detailed information about the facility and shall address all issues relating to odors from oil operations. Matters addressed within the plan shall include setbacks, signs with contact information, logs of odor complaints, method of controlling odors such as flaring and odor suppressants, and the protocol for handling odor complaints. The odor minimization plan shall be reviewed by the operator on an annual basis to determine if modifications to the plan are required. Any modifications to the odor minimization plan shall be submitted to the director for review and approval.	The Odor Minimization Plan was reviewed by FM O&G on 11/02/15 and it was determined that no modifications are required.
6	E.2.d.	Air Monitoring Plan. At all times the operator shall comply with the provisions of an air monitoring plan that has been approved by the director. The air monitoring plan shall include any measure requested by the director. During drilling, redrilling, and reworking operations, the operator shall monitor for hydrogen sulfide and total hydrocarbon vapors as specified in the approved plan. Total hydrocarbon vapors shall be monitored at the gas plant as specified in the approved plan. Such monitors shall provide automatic alarms that are triggered by the detection of hydrogen sulfide or total hydrocarbon vapors. For drilling, redrilling, or reworking monitors, the alarms shall be audible and/or visible to the person operating the drilling, redrilling, or reworking equipment. For the gas plant monitors, the alarms shall be audible or visible to the gas plant operator. Actions to be taken shall be as follows when specified alarm levels are reached:	FM O&G complied with the provisions of the approved Air Monitoring Plan. Compliance was monitored by County Environmental Compliance Coordinator (ECC) site visits.

#	CSD Section/ Plan	CSD Language	Compliance Description
7	E.2.d.i - iv	<p>i. At a hydrogen sulfide concentration of equal to or greater than five parts per million but less than 10 parts per million, the operator shall immediately investigate the source of the hydrogen sulfide emissions and take prompt corrective action to eliminate the source. The corrective action taken shall be documented in the drilling, redrilling, or reworking log. If the concentration is not reduced to less than five parts per million within four hours of the first occurrence of such concentration, the operator shall shut down the drilling, redrilling, or reworking operations in a safe and controlled manner, until the source of the hydrogen sulfide emissions has been eliminated, unless shutdown creates a health and safety hazard.</p> <p>ii. At a hydrogen sulfide concentration equal to or greater than 10 parts per million, the operator shall promptly shut down the drilling, redrilling, or reworking operations in a safe and controlled manner until the source of the hydrogen sulfide emissions has been eliminated, unless shutdown creates a health and safety hazard. The corrective action taken shall be documented in the drilling, redrilling, or reworking log. When an alarm is received, the operator shall promptly notify the county fire department- Health Hazardous Materials Division, the Culver City Fire Department, the Office of Emergency Services, and the SCAQMD.</p> <p>iii. At a total hydrocarbon concentration equal to or greater than 500 parts per million but less than 1,000 parts per million, the operator shall immediately investigate the source of the hydrocarbon emissions and take prompt corrective action to eliminate the source. The corrective action taken shall be documented in the drilling log for drilling, redrilling, or reworking and in the gas plant log for the gas plant. If the concentration is not reduced to less than 500 parts per million within four hours of the first occurrence of such concentration, the operator shall shut down the drilling, redrilling, reworking, or gas plant operations in a safe and controlled manner, until the source of the hydrocarbon emissions has been eliminated, unless shutdown creates a health and safety hazard.</p> <p>v. At a total hydrocarbon concentration equal to or greater than 1,000 parts per million, the operator shall promptly shut down the drilling, redrilling, or reworking or gas plant operations in a safe and controlled manner, until the source of the hydrocarbon emissions has been eliminated, unless shutdown creates a health and safety hazard. The corrective action taken shall be documented in the drilling log for drilling, redrilling, or reworking and in the gas plant log for the gas plant. When an alarm is received, the operator shall promptly notify the county fire department- Health Hazardous Materials Division, the Culver City Fire Department, and the SCAQMD.</p>	<p>In 2015, no notifications to The County or City of Culver City Fire Departments or AQMD were required.</p>
8	E.2.d.v	<p>All the monitoring equipment shall keep a record of the levels of total hydrocarbons and hydrogen sulfide detected at each of the monitors, which shall be retained for at least five years. The operator shall, on a quarterly basis, provide a summary of all monitoring events where the hydrogen sulfide concentration was at five parts per million or higher and the total hydrocarbon concentration was at 500 parts per million or higher to the fire chief. At the request of the fire chief, the operator shall make available the retained records from the monitoring equipment.</p>	<p>In 2015, FM O&amp;G provided the Fire Chief with quarterly reports, all of which reported zero (0) events during the respective quarter, on 4/2/15, 7/1/15, 10/7/15 and 1/4/16.</p>
9	E.2.e	<p>Portable Flare for Drilling. The operator shall have a gas buster and a portable flare, approved by the SCAQMD, at the oil field and available for immediate use to remove any gas encountered during drilling operations from drilling muds prior to the muds being sent to the shaker table, and to direct such gas to the portable flare for combustion. The portable flare shall record the volume of gas that is burned in the flare. The volume of gas burned in the flare shall be documented in the drilling log. The operator shall notify the fire chief and the SCAQMD within 48 hours in the event a measurable amount of gas is burned by the flare, and shall specify the volume of gas that was burned in the flare. No drilling or redrilling shall be conducted in areas that are known to penetrate the Nodular Shale zone unless a fully operational and properly maintained gas buster and portable flare are installed on the rig. All other drilling and redrilling operations shall be conducted so that any measurable gas that is encountered can, and will, be retained in the wellbore until the gas buster and portable flare are installed on the rig, after which the gas will be run through the system. The operator shall immediately notify the fire chief and the SCAQMD in the event any gas from drilling or redrilling operations is released into the atmosphere without being directed to and burned in the flare.</p>	<p>No notifications to the Fire Chief or AQMD were required in 2015.</p>

#	CSD Section/ Plan	CSD Language	Compliance Description
10	E.2.f	Oil Tank Pressure Monitoring and Venting. All oil tanks that contain or could contain oil shall have a fully operational pressure monitoring system that continuously measures and digitally records the pressure in the vapor space of each tank. The detection system shall notify the operator via an alarm when the pressure in the tank gets within 10 percent of the tank relief pressure. In the event of an alarm, the operator shall immediately take corrective action to reduce the tank pressure. The corrective action shall be documented in the operator's log. The operator shall notify the fire chief and the SCAQMD within 24 hours if the pressure in any tank covered by this subsection ever exceeds such tank's relief pressure. Within seven calendar days after any tank vapor release, the operator shall report the incident to the SCAQMD as a breakdown event pursuant to Rule 430, and shall provide the fire chief with a written report of the event and the corrective measures undertaken and to be undertaken to avoid future oil tank vapor releases. The operator shall make any changes to such report that may be required to obtain approval from the fire chief and the SCAQMD, and shall promptly institute all corrective measures called for by the report.	No alarms requiring notification occurred in 2015; hence no notifications to the Fire Chief or the SCAQMD were necessary.
11	E.2.g	Odor Suppressant for Bioremediation Farms. When loading material or tilling material at the bioremediation farms, the operator shall use an odor suppressant such that no odor from the bioremediation farms can be detected at the outer boundary line.	The biofarms were not operated in 2015.
12	E.2.h	Odor Suppressant for Drilling and Redrilling Operations. The operator shall use an odor suppressant spray system on the mud shaker tables for all drilling and redrilling operations to ensure that no odors from said operations can be detected at the outer boundary line.	No drilling or redrilling activities occurred in 2015.
13	E.2.i	Closed Systems. The operator shall ensure all produced water and oil associated with production, processing, and storage, except those used for sampling only, are contained within closed systems at all times.	Closed systems were in place for all produced water and oil associated with production, processing and storage, except those used for sampling only.
14	E.2.j	Meteorological Station. The operator shall maintain and operate a meteorological station at the oil field in good operating condition and in compliance with all applicable Environmental Protection Agency ("EPA") and SCAQMD rules, regulations, and guidelines, and to the satisfaction of the director. The operator shall conduct an audit of the meteorological station on an annual basis and submit the results of the audit to the SCAQMD and the director. The operator shall maintain the data files for the meteorological station for a period of not less than 10 years. All such data shall be available upon request to the SCAQMD and the director.	FM O&G maintains and operates a meteorological station at the field in compliance with this policy. The 2014 annual audit of the station was submitted to the County on 05/14/14 and the 2015 annual audit is projected to be submitted in the spring or summer of 2015. FM O&G maintains data files for the station from CSD inception to present.
15	E.2.k	Updated Health Risk Assessment. After every five years of operation of the meteorological station, the operator shall provide the previous five years of metrological data to the SCAQMD and the director. If the SCAQMD or the director determines that the previous five years of metrological data from the oil field could result in significant changes to the health risk assessment that was conducted as part of the Baldwin Hills Community Standards District Environmental Impact Report, then the county may elect to re-run the health risk assessment using the previous five years of metrological data from the metrological station.	The last five years of data was submitted to the SCAQMD and the Director on 12/2/15.
16	E.2.l	Off-Road Diesel Construction Equipment Engines. All off-road diesel construction equipment shall comply with the following provisions:  i. Utilize California Air Resources Board ("CARB") EPA Certification Tier III or better certified engines or other methods approved by the CARB as meeting or exceeding the Tier III standard or Tier II certified engines as long as no drilling or redrilling occurs during construction.  iii. Utilize a CARB Verified Level 3 diesel catalyst. The catalyst shall be capable of achieving an 85 percent reduction for diesel particulate matter. Copies of the CARB verification shall be provided to the director. Said catalysts shall be properly maintained and operational at all times when the off-road diesel construction equipment is in use.	All off-road diesel construction equipment engines utilized Tier III or better diesel engines plus Level 3 CARB verified diesel catalysts during all construction projects in 2015.

#	CSD Section/ Plan	CSD Language	Compliance Description
17	E.2.m	<p>Drill Rig Engines. All drilling, re-drilling, and reworking rig diesel engines shall comply with the following provisions:</p> <p>i. Utilize CARB/EPA Certification Tier II or better certified engines, or other methods approved by CARB as meeting or exceeding the Tier II standard.</p> <p>ii. Utilize second generation heavy duty diesel catalysts capable of achieving 90 percent reductions for hydrocarbons and for particulate matter smaller than 10 microns. Said catalysts shall be properly maintained and operational at all times when the diesel engines are running.</p>	All drilling and re-drilling rigs utilized CARB/EPA Certified Tier II or better diesel engines to help reduce NOx emissions and heavy duty diesel catalysts to help reduce hydrocarbons and particulate matter.
18	E.2.n.	<p>Drilling and Redrilling Setbacks. The following setbacks shall apply within the oil field for drilling or re-drilling:</p> <p>i. At least 400 feet from developed areas.</p> <p>ii. At least 20 feet from any public roadway.</p>	All required drilling and re-drilling setbacks set forth in this policy were complied with as documented in the 2015 Drilling Plan and all subsequent, individual well permits approved by the County. However, no drilling or re-drilling occurred in 2015.
19	E.2.o	Construction Schedule. To reduce construction air emissions, no overlap shall be permitted in major facility construction and installation activities such as the steam drive plant, the water processing facility, or the oil cleaning plant.	There was no overlap in construction activity since no steam drive plant, water processing facility or oil cleaning plant were installed in 2015.
20	E.2.p	Fugitive Dust Control Plan. The operator shall comply with the provisions of a fugitive dust control plan that has been approved by the director. The plan shall be based upon the requirements of SCAQMD Rule 403 and the SCAQMD CEQA Guideline Fugitive Dust Control Measures. The fugitive dust control plan shall be reviewed by the operator every five years to determine if modifications to the plan are required. Any modifications to the fugitive dust control plan shall be submitted to the director for review and approval. The fugitive dust control plan shall include any measured requested by the director.	The Fugitive Dust Control Plan was submitted on March 26, 2009 and revised and approved in April 2010. Compliance with the provisions of the Plan are verified by the County ECC. FM O&G reviewed the Plan in 2015 and determined that no modifications to the plan are required. The County was notified of this determination on 03/11/15.
21	E.3.a	Natural Gas Liquid Blending. Natural gas liquids at the gas plant shall be blended with the oil to the maximum allowable pipeline system vapor pressure. Natural gas liquids storage shall be limited to the volume allowed in the risk management plan approved by the fire department.	FM O&G blends the natural gas liquids (NGLs) to the maximum allowable pipeline system vapor pressure as required by the subject CSD provision requirement. The storage of the NGL tank is in compliance with the criteria in the Risk Management Plan. The LA County Fire Department verifies compliance with this provision via site inspections.
22	E.3.b	Propane and Natural Gas Liquids Bullet Fire-Proofing. The operator shall install and maintain fire-proofing insulation on all propane and natural gas liquids bullets within the oil field. The fire-proofing insulation shall have a minimum two hour fire rating and otherwise be acceptable to the fire chief. All propane and natural gas liquid bullets shall be equipped with an automatic deluge system.	The propane and natural gas liquids bullet fire proofing was completed on February 23, 2009 with the associated documentation submitted to the LA County Fire Department on February 25, 2009.
23	E.3.c	Steam Drive Plant Setback. The steam drive plant, if constructed, shall be located at least 1,000 feet from a developed area and shall use urea or equivalent, low toxicity material for any nitrogen oxide emission reduction that is required by the SCAQMD.	A steam drive plant has not been proposed or constructed to date.
24	E.3.d.i	The operator shall ensure that all existing oil tank areas in the oil field, unless determined by the director to be infeasible, and all the new oil tank areas shall have secondary containment (berms and/or walls) that can contain at least 110 percent of the largest oil tank volume to reduce the likelihood of oil spills entering the retention basins. In the event the director determines that it would be infeasible to provide 110 percent containment for a particular existing oil tank, the operator shall provide such containment as the director determines is feasible.	As documented in the PXP 2009 Tank Leak Detection and Containment at Inglewood Oil Field report, approved in May 2009, all tanks have secondary containment per this provision.

#	CSD Section/ Plan	CSD Language	Compliance Description
25	E.3.d.ii	All retention basins in the oil field shall be adequately sized, and maintained to handle a 100-year storm event plus a potential spill of the volume of the largest tank that would drain into each basin.	The PXP Retention Basin Study, completed in March 2009 and revised in September 2009 and January 2010, analyzed and modeled the capacities of the basins along with a 100 year storm event. The study concluded that the onsite basins have the capability to handle a 100 year storm event without flooding per the CSD requirement. The study further determined that in the event of an oil tank failure during a 100 year storm event, the basin weir system would prevent oil from going offsite. The County Public Works Department has reviewed and approved the retention basin capacities.
26	E.3.d.iii	All above ground piping in the oil field that contains or could contain oil shall be protected by basins or secondary containment measures (berms and/or walls).	Most of the above ground piping throughout the oil field is not protected by individual pipeline specific secondary containment or basin structures; however, the oil field retention basin system prevents any fluid from the above ground piping from traveling offsite.
27	E.4.a.i, ii and iii	i. All proposed grading shall be subject to prior review and approval by the director of public works. ii. Grading involving up to 5,000 cubic yards and grading associated with the bioremediation farms may be undertaken pursuant to a county master grading plan stamped by a registered professional engineer and a California certified engineering geologist and approved by the director of public works. iii. No slope of cut or fill shall have a gradient steeper than two to one (2:1) unless specifically approved by a site specific geotechnical report. iv. Cuts and fills shall be minimized to avoid erosion and visual impacts.	FM O&G conducts all grading in accordance with the approved Master Grading Plan as approved by the LA County Department of Public Works (DPW). The 2015 Master Grading Plan was submitted to DPW on November 13, 2014 and approved on January 20, 2015.
28	E.4.b.ii	A site-specific geotechnical investigation shall be completed for grading in excess of 5,000 cubic yards, unless associated with the on-site Bioremediation Farms and approved pursuant to a master grading plan approved by the director of public works, and for any grading that supports or impacts a critical facility as determined by the director. The investigation shall be completed by a California certified engineering geologist and submitted to the director and the director of public works for review and approval, in conjunction with an application for a revised grading permit.	No grading that occurred in 2015 triggered the requirement for a site specific geotechnical investigation.
29	E.4.b.ii	A site-specific geotechnical investigation shall be completed for all proposed permanent structures. The investigation shall include analysis and recommendations associated with potential seismically induced ground failure, such as differential settlement and lateral spreading. The geotechnical investigation shall be completed by a California certified engineering geologist and submitted to the director of public works for review and approval.	Geotechnical investigations have been completed for the installation of permanent structures and are submitted to the County with applications to the Department of Regional Planning (DRP) and Building & Safety.
30	E.4.c.i	The operator shall comply with all provisions of an erosion control plan that has been approved by the director. The erosion control plan shall be reviewed by the operator every two years to determine if modifications to the plan are required. Any modifications to the erosion control plan shall be submitted to the director for review and approval. The erosion control plan shall include any measures requested by the director.	The PXP 2009 Erosion Control Plan Inglewood Oil Field was initially submitted on May 26, 2009, revised in October 2009 and approved by County Public Works in May 2010. FM O&G reviewed the Erosion Control Plan in 2015 and determined that no modifications to the plan are required. The County was notified of this determination on 05/15/14. The next bi-annual review will occur in May of 2016.
31	E.4.d	Restoration of Slopes. Slopes shall be restored to their original grade once the use that required the grading of the slope has been discontinued. However, if restoration of a slope would negatively affect existing drainage patterns or slope stability, then the slope shall be restored to a grade that avoids these negative effects.	No grading that would negatively affect existing drainage patterns or slope stability occurred in 2015.

#	CSD Section/ Plan	CSD Language	Compliance Description
32	E.4.e	<p>Ground Movement Surveys. The operator shall conduct ground movement surveys once every 12 months, or more frequently if determined necessary by the director of public works, following all provisions of a ground movement monitoring plan that is acceptable to DOGGR and the director of public works, that calls for both vertical and horizontal ground movement surveys, at specified survey locations within, and in the vicinity of, the oil field, utilizing high precision Global Positioning System technology, in combination with a network of ground stations (or any alternative technology specified in the ground movement monitoring plan approved by the director of public works), and following other survey methods outlined in the plan. The surveys shall be conducted by a California-licensed surveyor. The survey results shall be analyzed in relation to oil field activities, such as production, steam injection, and water flooding taking into consideration individual oil producing zones, injection schedules, rates, volume, and pressure. The analysis shall be completed in collaboration by a California-registered professional petroleum engineer, registered geotechnical engineer, and certified engineering geologist. The results of the annual monitoring survey and analysis shall be forwarded to DOGGR and the director of public works. If requested by DOGGR or the director of public works, the operator shall make modifications to the ground movement monitoring plan. In the event that survey indicates that on-going ground movement, equal to or greater than 0.6 inches at any given location, or a lesser value determined by the director of public works is occurring in an upward or downward direction in the vicinity of or in the oil field, the operator shall review and analyze all claims or complaints of subsidence damage that have been submitted to the operator or the county by the public or a public entity in the 12 months since the last ground movement survey. Based thereon, the operator shall prepare a report that assesses whether any of the alleged subsidence damage was caused by oil operations and submit said report to DOGGR and the department of public works. The department of public works shall review the report to determine if it concurs with its conclusions. If the report concludes that damage has not been caused by oil operations, and the department of public works does not concur in that conclusion, it shall forward its conclusions to DOGGR for its review and possible action. If the report concludes that damage was caused by oil operations and the department of public works concurs with any such conclusion, the department of public works shall forward the department of public works' conclusions to DOGGR and ask DOGGR to evaluate the operator's fluid injection and withdrawal rates to determine whether adjustments to these rates may alleviate the ground movement, and if so, where in the oil field such adjustments should be made. The operator shall implement whatever adjustments in the rates of fluid injection and/or withdrawal that DOGGR determines are necessary and appropriate to alleviate any ground movement damage. The county shall promptly notify the CAP of any such action that is taken pursuant to this subsection. Injection pressures associated with secondary recovery operations (i.e., water flooding) or disposal of produced fluids shall not exceed reservoir fracture pressures as specified in Title 14 of the California Code of Regulations, section 1724.10, and as approved by the DOGGR.</p>	<p>Ground movement surveys have been completed as required by the approved Accumulated Ground Movement Plan. The Year 2014 annual survey was submitted in September 2015 to DPW and DOGGR. Plans are to begin surveying in January 2016 for the Year 2015 report.</p> <p>No monuments had a change in elevation in excess of the 0.6" threshold in Year 2014. Regardless, an investigation was conducted on the one property damage claim received and submitted to County Public Works and DOGGR for review. The report concluded that the damage was not caused by oil field activities.</p>
33	E.4.f	<p>Construction of Permanent Structures. No permanent structures shall be constructed in an Alquist-Priolo Fault Zone without preparation of a fault study by a California-certified engineering geologist. Following the fault study, no permanent structures shall be placed within 50 feet of a known active fault. The fault investigation report shall be submitted to the director of public works for review and approval.</p>	<p>No permanent structures have been constructed in an Alquist-Priolo Fault Zone since the adoption of the CSD.</p>
34	E.4.g	<p>Oil Field Accelerometer. The operator shall operate and maintain an accelerometer at the oil field to determine site-specific ground accelerations as a result of any seismic event in the region (Los Angeles/Orange County and offshore waters of the Santa Monica Bay and San Pedro Channel). Readings from the accelerometer shall be recorded at the oil field and transmitted in real-time to the Caltech Seismological Laboratory. The operator shall cease operations and inspect all oil field pipelines, storage tanks, and other infrastructure following any seismic event that exceeds a ground acceleration at the oil field of 13 percent of gravity (0.13 g) and promptly notify the director. The operator shall not reinstitute operations at the oil field and associated pipelines until it can reasonably be determined that all oil field infrastructure is structurally sound.</p>	<p>The oil field accelerometer seismic station was installed and began collecting data on May 20, 2009. The data is transmitted in real time by cell link to the CalTech Seismological Laboratory where the data is recorded and stored. The accelerometer has not measured ground acceleration in excess of the 13 percent of gravity (0.13 g) criteria of this provision to date, thus the oil field has not been required to shut in due to a ground acceleration event.</p>
35	E.4.h	<p>Pipeline Management Plan. The operator shall maintain and implement a pipeline management plan that meets the requirements of DOGGR regulations.</p>	<p>The pipeline management plan is being maintained per DOGGR regulations.</p>

#	CSD Section/ Plan	CSD Language	Compliance Description
36	E.4.i	Paleontological Monitor. The operator shall have a qualified paleontologist, approved by the director, monitor all rough grading and other significant ground disturbing activities in paleontological sensitive sediments. The sensitive sediments that have been identified within the oil field include the Lower to Middle Pleistocene San Pedro Formation and the Middle to Upper Pleistocene Lakewood Formation. A paleontologist will not be required on site if excavation is only occurring in artificial fill or Holocene alluvium.	In 2015, no work occurred in paleontological sensitive sediments. As such, no monitoring occurred.
37	E.5.a	E.5.a Noise Limits. The operator shall comply with the following provisions: i. All oil operations on the oil field shall comply with the noise provisions of Chapter 12.08 of Title 12 of the County Code, with the exception of drilling, redrilling, and reworking, which are exempt from the provisions of said chapter. ii. Hourly, A-weighted equivalent noise levels associated with drilling, redrilling, and reworking shall not elevate existing baseline levels by more than five dBA at any developed area. For daytime activities (7:00a.m. to 7:00p.m.) existing baseline noise levels shall be defined as the maximum daytime equivalent noise level (Leq) at the closest monitoring site as shown in Table 4.9.3 of the 2008 Baldwin Hills Community Standards District Environmental Impact Report. For nighttime activities (7:00 p.m. to 7:00a.m.), existing baseline noise levels shall be defined as the minimum nighttime equivalent noise level (Leq) at the closest monitoring site as shown in Table 4.9.3 of the 2008 Baldwin Hills Community Standards District Environmental Impact Report. Updated baseline noise levels may be set and additional monitoring sites may be established, from time to time by the director. In no case shall baseline noise levels include any drilling, redrilling, or reworking operations. iii. Noise produced by oil operations shall include no pure tones when measured at a developed area.	Noise monitoring to date has not identified any violations associated with oil field operations above the baseline levels of the noise limits set forth in the CSD or Settlement Agreement.
38	SA 2	a. The CSD currently provides that hourly, A-weighted equivalent noise levels associated with drilling, redrilling and reworking wells shall not elevate baseline levels (which shall not include crilling, redrilling or reworking operations) by more than five A-weighted decibels ("dBA") at the Oil Field boundary of any Developed Area. Instead of the referenced five dB A provision, PXP shall limit the night time (10 p.m. to 7 a.m.) noise levels at Developed Areas to no more than three dBA above a one-hour baseline average for the defined nighttime period, but at no time will PXP be required to maintain noise levels below the baseline nighttime noise levels. Furthermore, PXP and the County determined the baseline noise levels at four additional Oil Field boundary locations near Developed Areas, selected by PXP and the County, in addition to the seven utilized in the EIR for a total of 11 locations. If PXP violates the above noise requirements, no new drilling or redrilling permits shall be issued by the County until PXP, in consultation with the County, identifies the source of the noise and PXP takes steps necessary to assure compliance with the above-specified threshold. b. If drilling, redrilling or reworking operations elevate nighttime baseline noise levels by more than 10 dBA for more than 15 minutes in any one hour as independently verified and determined by the County, PXP, in consultation with the County, shall identify the cause and source of the noise and take steps to avoid such extended periods of noise elevation in the future. This provision does not negate the CSD noise limits between 7 a.m. to 10 p.m.	Noise monitoring to date has not identified any violations associated with oil field operations above the baseline levels of the noise limits set forth in the CSD or Settlement Agreement.
39	E.5.b	Backup Alarms. Backup alarms on all vehicles operating within the oil field shall be disabled between the hours of 8:00 p.m. and 8:00 a.m. During periods when the backup alarms are disabled, the operator shall employ alternate, low-noise methods for ensuring worker safety during vehicle backup, such as the use of spotters.	This provision has been implemented and is ongoing.
40	E.5.c	Quiet Mode Drilling Plan. All drilling and redrilling on the oil field between the hours of 6:00 p.m. and 8:00 a.m. shall be conducted in conformity with a quiet mode drilling plan that has been approved by the director and the director of public health. The quiet mode drilling plan shall be reviewed by the operator every year to determine if modifications to the plan are required. The operator shall make changes to the plan if requested by the director or the director of public health. Any modifications to the quiet mode drilling plan shall be submitted to the director and the director of public health for review and approval. The quiet mode drilling plan shall include any measures requested by the director or the director of public health.	No drilling and redrilling activities occurred in 2015. FM O&G reviewed the Quiet Mode Drilling Plan on 11/20/15 and concluded that there are no modifications necessary to the plan in 2015.
41	E.5.d	Equipment Servicing. All noise producing oil field equipment shall be regularly serviced and repaired to minimize increases in pure tones and other noise output over time. The operator shall maintain an equipment service log for all noise-producing equipment.	FM O&G Operations maintains service records for such equipment.



#	CSD Section/ Plan	CSD Language	Compliance Description
42	E.5.e	Deliveries to the Oil Field. Deliveries to the oil field shall not be permitted after 8:00 p.m. and before 7:00a.m. except in cases of emergency. Deliveries on Sundays or legal holidays shall not be permitted after 8:00 p.m. or before 9:00a.m., except in cases of emergency.	This provision has been implemented and is ongoing.
43	E.5.f	Deliveries within the Oil Field. Deliveries to areas of the oil field located within 500 feet of any residential property shall not be permitted after 5:00 p.m. or before 7:00a.m. except in cases of emergency. Deliveries to such areas on Sundays or legal holidays shall not be permitted after 5:00 p.m. and before 9:00a.m., except in cases of emergency.	This provision has been implemented and is ongoing.
44	E.5.g	Time Limits for Construction. Construction of permanent structures shall not be permitted after 7:00 p.m. and before 7:00a.m., or during Saturdays, Sundays, or legal holidays.	No construction occurs after 7:00 p.m. and before 7:00 a.m., or during Saturdays, Sundays, or legal holidays.
45	E.5.h	Construction Equipment. All construction equipment shall be selected for low-noise output. All construction equipment powered by internal combustion engines shall be properly muffled and maintained.	All construction equipment is selected to comply with this provision.
46	E.5.i	Construction Equipment Idling. Unnecessary idling of construction equipment internal combustion engines is prohibited.	All FM O&G construction equipment operators implement this provision.
47	E.5.j	Worker Notification. The operator shall instruct employees and subcontractors about the noise provisions of this subsection E.5 prior to commencement of each and every drilling, redrilling, reworking, and construction operation, and shall annually certify to the director that such employees and subcontractors have been properly trained to comply with such noise provisions. The operator shall prominently post quiet mode policies at every drilling and redrilling site.	Employees and contractors were trained on the provisions of E.5 in 2015 and certification of such was provided to the DRP on 11/24/15. No drilling or redrilling occurred in 2015.
48	E.6	Vibration Reduction. All oil operations on the oil field shall be conducted in a manner that minimizes vibration. Additionally, vibration levels from oil operations at the oil field shall not exceed a velocity of 0.25 mm/s over the frequency range 1 to 100 Hz at any developed area.	All operations are conducted to minimize vibration. The report prepared by the County in response to the request by PXP in October 2011 to increase the annual number of wells allowable for drilling or redrilling, the Annual Well Increase Evaluation, December 2011, includes analysis on the implementation of the vibration provision of the CSD. The report concluded that the CSD requirements have been effective at keeping vibration to a level that is considered protective of the health and general welfare of the public. Further, the draft periodic review concluded that this provision is fully effective.
49	E.7.a	Oil Spill Response. The operator shall comply with all provisions of an Emergency Response Plan ("ERP") that has been approved by the director, to protect biological species and to revegetate any areas disturbed during an oil spill or clean-up activities. The operator shall make changes to the ERP if requested by the director. Any modifications to the ERP shall be submitted to the director for review and approval. The ERP shall include any measures to protect biological species that may be requested by the director.	Since approval of the ERP by DRP, no updates have been needed or requested.
50	E.7.b	Special Status Species and Habitat Protection. The operator shall comply with all provisions of a special status species and habitat protection plan that has been approved by the director. The operator shall make changes to the plan if requested by the director. Any modifications to the plan shall be submitted to the director for review and approval. The special status species and habitat protection plan shall include any measures requested by the director.	The Special Status Species and Habitat Protection Plan was first prepared in 2009 and was approved on November 15, 2010. The plan was prepared by a County approved ecologist/biologist. Compliance with subsections E.7.b through E.7.h has been documented annually since 2010 - the 2015 compliance report was submitted on 01/22/16.



#	CSD Section/ Plan	CSD Language	Compliance Description
51	E.7.c, h	<p>c) Habitat Restoration and Revegetation Plan. Prior to any disturbance of sensitive natural habitat areas, as identified in the special status species and habitat protection plan, the operator shall hire a biologist, approved by the county, to conduct a survey of the area to determine if significant impact to sensitive natural habitat, including coastal sagebrush, coyote bush scrub, riparian scrub, and oak woodland will occur. If the biologist determines that significant impact to sensitive natural habitat will occur, then the operator shall have a county-approved restoration specialist, with expertise in southern California ecosystems and revegetation techniques, prepare a habitat restoration and revegetation plan. The plan shall be submitted to the director for review and approval. The director shall make best efforts to complete the review of the plan as expeditiously as possible and shall then either approve the plan or provide the operator with a list of specific items that must be included in the plan prior to approval. No removal of sensitive natural habitat shall occur until the plan has been approved by the director. The habitat restoration and revegetation plan shall include any measures requested by the director.</p> <p>h) Habitat Restoration. Within 60 days of completion of construction activities that have significantly impacted sensitive natural habitat, the operator shall begin habitat restoration consistent with the approved native habitat restoration and revegetation plan discussed in subsection E.7.c. Restoration priority shall be given to areas of degraded habitat connecting areas of higher quality habitat and where restoration would produce larger corridors to support the migration and movement of wildlife. The operator shall replace any significant loss of sensitive natural habitat at the following ratios:</p> <ul style="list-style-type: none"> <li>i. 1:1 for each acre of coastal sagebrush or coyote bush scrub.</li> <li>ii. 2:1 for each acre of riparian scrub or oak woodland.</li> </ul>	<p>No Habitat Restoration and Revegetation Plans were necessary in 2015.</p>
52	E.7.d, e, f, g	<p>d) Pre-Construction Surveys. The following surveys shall be conducted prior to any significant vegetation removal in sensitive natural habitat as identified in the special status species and habitat protection plan.</p> <p>e) Listed Plant or Wildlife Species. If federal- or State-listed plant or wildlife species are found, then the operator shall comply with all applicable United States Fish and Wildlife and California Department of Fish and Game rules and regulations.</p> <p>f) Construction Monitoring. If the pre-construction surveys find sensitive plant, wildlife species, or nesting birds, a biological monitor hired by the operator, and approved by the County, shall be on site during construction to monitor the construction activities.</p> <p>g) Tree and Riparian Scrub Removal. Removal of native or non-native trees and riparian scrub vegetation shall be scheduled, as possible, for removal outside the nesting season to avoid impacts to nesting birds. If avoidance of removal of trees or riparian scrub during the recommended periods is not possible, a county-approved biologist shall perform a survey to ensure that no nesting birds are present prior to removal. If for any reason a nest must be removed during the nesting season, the operator shall provide written documentation to the director demonstrating concurrence from the United States Fish and Wildlife Service and California Department of Fish and Game authorizing the nest relocation and a written report documenting the relocation efforts.</p>	<p>All required pre-construction surveys and construction monitoring were completed in 2015 and will be documented in the 2015 Special Status Species and Habitat Protection Plan annual report (report) scheduled for submittal in Winter or Spring of 2016. The 2014 report was submitted to DRP on 03/25/15. No listed plant or wildlife species were found.</p>
53	E.8.a	<p>Cone Trust House. Oil operations shall not result in impacts to the Cone Trust House</p>	<p>The Cone Trust House is off limits to oil field staff to prevent any impacts to the building.</p>
54	E.8.b	<p>E.8.b: Archaeological Training. The operator shall provide archeological training for all construction personnel who will be involved with ground disturbance activities at the oil field. All such construction personnel shall be required to participate in the training and will receive training material prepared by a qualified archaeologist prior to working on ground disturbance activities.</p>	<p>All construction personnel involved with ground disturbance activities were provided archeological training in 2015.</p>
55	E.8.c	<p>Construction Treatment Plan. The operator shall comply with all provisions of a construction treatment plan, approved by the director, to ensure that any new archeological discoveries are adequately recorded, evaluated, and, if significant, mitigated. In the event that unknown archeological artifacts are encountered during grading, clearing, grubbing, and/or other construction activities, work shall be stopped immediately in the vicinity of the find and the resource shall be evaluated by a qualified archaeologist, approved by the director. The construction treatment plan shall include any measures requested by the director.</p>	<p>No archaeological artifacts were uncovered in 2015.</p>

#	CSD Section/ Plan	CSD Language	Compliance Description
56	E.9	Lighting. Outdoor lighting shall be restricted to only those lights which are required by code for the lighting of building exteriors, drilling, and redrilling rigs and for safety and security needs. In addition, the operator shall comply with the following provisions: a. Screening. All new point lighting sources within the oil field shall be screened and directed to confine direct rays to the oil field and to prevent offsite spillover lighting effects to the extent feasible. b. Lighting Plan. A detailed lighting plan shall be prepared for each new permanent structure and submitted to the director for review and approval. No work may be commenced on such permanent structure until the lighting plan therefore has been approved by the director. The lighting plan shall include any measures requested by the director.	In November 2008, an assessment of all oil field lighting was completed to confirm compliance with the CSD lighting provisions and to confirm that there were no offsite lighting impacts.
57	E.10 SA 11 G.7 (2015)	E.10: Landscaping, Visual Screening, Irrigation and Maintenance. The operator shall comply with the conceptual landscaping plan for the oil field prepared by Mia Lehrer & Associates, dated October 2008, on file at the department of regional planning, which is intended to beautify and screen the oil field from adjoining residential, recreational, and institutional areas or adjacent public streets or highways. Landscaping required by this plan shall be completed in phases over a two-to five-year period as approved by the director. All landscaping on the oil field shall be routinely inspected (on at least a monthly basis) and maintained in a neat, clean, and healthful condition, including proper watering, pruning, weeding, fertilizing, and replacement of plants as needed. Litter shall also be removed on a regular basis. SA 11: Landscaping. PXP agrees to prepare and implement a series of landscape plans ("Landscape Plans") that enhance the Mia Lehrer Landscape Improvements Concepts plan dated November 4, 2008 to include, but not be limited to, landscaping along or near the border of the Oil Field in consultation with the County and subject to the County's approval. PXP's Landscape Plans shall be forwarded to the CAP for review. PXP will use best efforts to complete installation of the first two phases of the Landscape Plans along La Brea, between Stocker and Slauson, and Ladera Crest, within nine (9) months of County's final approvals of each of those first two Landscaping Plans using best landscaping practices. PXP agrees that it will complete the entire landscaping required by the County-approved Landscape Plans within three years after approval by the County of the final phase. G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "FM O&G schedule installation of the remaining E.10 landscaping phases to achieve the landscaping required by this provision in a timely manner.	Landscaping for Phases 1 (Windsor Hills/La Brea), 2 (Ladera Crest looking north) and 5 (north of Stocker and on the west side of La Cienega) have been completed and are routinely inspected. Phase 3 (south of Stocker on the east side of La Cienega) was approved by the County in 2013 and will be implemented after Phases 6 & 7. Phase 4 (north of Stocker on the east side of La Cienega) is currently being implemented in 2015. Phase 6 (Fairfax Avenue) was approved by DRP 10/26/15 and the Phase 7 (Stocker Street) was approved by DRP 10/26/15. Both Phase 6 & 7 are requiring final DPW final approval.
58	E.11.a and b	Oil Field Waste Removal. The operator shall comply with the following provisions: a) Waste Collection. All drilling, redrilling, and reworking waste shall be collected in portable steel bins compliant with United States Department of Transportation standards. Any drilling, redrilling, and reworking wastes that are not intended to be injected into a Class II Well, as permitted by DOGGR, shall be removed from the oil field no later than 30 days following completion of the drilling, redrilling, and reworking. This provision does not apply to active sumps and mud pits. b) Waste Discharge. No oil field waste shall be discharged into any sewer, storm drain, irrigation systems, stream or creek, street, highway, or drainage canal. Nor shall any such wastes be discharged on the ground provided that the foregoing shall not prohibit the proper use of active drilling sumps and mud pits.	All reworking wastes were collected in portable steel bins compliant with USDOT standards and removed from the field within 30-days of completion of the activity. No drilling or redrilling occurred in 2015. There are no sumps or mud pits on the field. No oil field waste was discharged off site.
59	E.11.c	Recycling Plan. The operator shall comply with all provisions of a recycling plan that has been approved by the director. The recycling plan shall include any elements requested by the director.	The Recycling Plan was approved on October 3, 2011 and has been implemented and is ongoing.

#	CSD Section/ Plan	CSD Language	Compliance Description
60	E.12	Construction of Private Roads. Roads and other excavations shall be designed, constructed, and maintained to provide stability of fill, minimize disfigurement of the landscape, prevent deterioration of vegetation, maintain natural drainage, and minimize erosion. Prior to construction of any new road, the operator shall prepare and submit to the director of public works for review and approval a private road construction plan. The operator shall thereafter comply with all provisions of the approved private road construction plan. All new private access roads leading off any surfaced public street or highway shall be paved with asphalt or concrete not less than three inches thick for the first 50 feet of said access road from the public street or highway.	No private roads have been constructed to date and all oil field activities utilize existing access roads.
61	E.13.a-e	Signs. All signage shall comply with Part 10 of Chapter 22.52 of Title 22. In addition, the operator shall comply with the following provisions: a. Perimeter Identification Signs. Identification signs, at intervals acceptable to the director, shall be posted and maintained in good condition along the outer boundary line fence and along the fences adjoining the public roads that pass through the oil field. Each sign shall prominently display current and reliable emergency contact information that will enable a person to promptly reach, at all times, a representative of the operator who will have the expertise to assess any potential problem and recommend a corrective course of action. Each sign shall also have the telephone number of the county department of regional planning zoning enforcement section and the number of SCAOMD that can be called if odors are detected. b. Main Entrance Sign. A sign shall be posted and maintained in good condition at the main entrance of the oil field prominently displaying a telephone number by which persons may contact a representative of the operator at all times to register complaints regarding oil field operations. c. Other Required Signs. All identification signs, warning signs, no trespassing signs, and other signs required by county, state and federal regulations shall be properly posted and maintained in all required locations and in good condition. d. Well Identification Signs. Well identification signs including the well name and well number shall be posted and maintained in good condition at each well location. e. No Littering Signs. "No Littering" signs shall be prominently posted and maintained in good condition on all oil field entrance gates.	The installation of the signage required by this provision was completed upon approval of the Signage Plan dated January 2009 (Revision1) and approved by the County on May 18, 2009. In 2013, all required signage was updated to reflect to the name new Operator of the oil field, Freeport-McMoRan Oil & Gas and to remove the name of the previous Operator, Plains Exploration & Production Company (PXP).
62	E.14	Painting. All oil operation-related structures visible from public roadways and surrounding properties within the oil field shall be painted or otherwise surfaced or textured with a color that is compatible with the surrounding areas and has been approved by the director. The painting or other surfacing of all structures covered by this subsection shall thereafter be maintained in good condition.	The painting of the Inglewood Oil Field structures and equipment was completed on November 12, 2012. The paint color, Icorice, was chosen with assistance of a landscape architect and was approved by the LA County Department of Regional Planning. Maintenance of the painting and coatings of the equipment and structures at the oil field is a continuous process.
63	E.15 G.7 (2015)	Sumps. The operator shall comply with all of the following provisions: a. Sump Clean Out. All sumps that are used, installed, or maintained for use in connection with any well, and which have not been used for 90 days for the operation of or the drilling, redrilling, or reworking of such well or any other well in the vicinity, shall be cleaned out, and all oil, rotary mud, and rubbish removed. b. Sump Fencing. Around each sump of any depth, there shall be erected and continuously maintained a fence that encloses the sump and complies with the requirements of Sections 11.48.010 - 11.48.050, Title 11 of the County Code. This provision shall not apply to sumps that are constantly and immediately attended while drilling, redrilling, and reworking operations are proceeding as specified in Section 11.48.020, Title 11 of the County Code. G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "the Operator continue the use of metal and or plastic bins E.15.a and tanks consistent with current practice as the elimination of the use of below ground sumps is considered to be a significant environmental benefit.	There are no sumps at the Inglewood Oil Field.

#	CSD Section/ Plan	CSD Language	Compliance Description
64	E.16.a-d	Well Cellars. All well cellars shall be constructed in accordance with the most current American Petroleum Institute standards. In addition, the operator shall comply with the following provisions: a. Cellar Fluids. Well cellars shall be kept free of all oil, water, or debris at all times. During drilling, re-drilling, and reworking, the cellar shall be kept free of excess fluids by a pump which discharges into a waste tank, mud pit, vacuum truck, or other approved disposal system. b. Access to Multi-Well Cellars. All multi-well cellars exceeding three feet in depth and 25 feet in length shall have two means of entrance and exit and an additional exit for every 50 feet in length thereafter. At least one means of entrance or exit for all multi-well cellars of 25 feet in length shall be a stairway constructed to California Division of Industrial Safety standards. c. Single-Cellar Covers. All single-cellars shall be covered with open grating and have no openings larger than three inches at any point. Covers shall be capable of supporting vehicle weight or guardrails shall be erected to prevent vehicle access. d. Cellar Ladder Openings. All openings for ladders through grating shall be designed to allow exit from underside without obstruction and shall be kept free of storage of any type. Said openings shall not be less than 24 inches on either side.	Implementation is ongoing where applicable.
65	E.17.a	Construction Storm Water Pollution Prevention Plan ("SWPPP"). The operator shall maintain and implement all provisions of a storm water pollution prevention plan ("SWPPP") that has been inspected by the Regional Water Quality Control Board and the county department of public works. The operator shall provide the director and the director of public works with a copy of the SWPPP, and any future modifications, revisions, or alterations thereof, or replacements therefore. The SWPPP shall be updated prior to new construction activities as required by the Regional Water Quality Control Board.	The DPW was provided with the most up-to-date copy of the RWQCB reviewed SWPPP on 11/26/13.
66	E.17.b	Spill Prevention, Control, and Countermeasure Plan ("SPCCP"). The Operator shall maintain and implement all provisions of a spill prevention, control, and countermeasure plan ("SPCCP") which meets the requirements of the Local California Unified Program Agency and the United States Environmental Protection Agency. The operator shall provide the director and the fire chief with a copy of the SPCCP and any future modifications, revisions, or alterations thereof, or replacements therefore.	FM O&G provided DRP and the Los Angeles County Fire Department (LACFD) a copy of the most up-to-date SPCC on 10/09/13.
67	E.17.c	Hydrological Analysis. A site-specific hydrologic analysis shall be completed to evaluate anticipated changes in drainage patterns and associated increased runoff at the site for any new grading that results in the loss of vegetated, sandy, permeable ground areas, which could alter surface runoff at the site. The analysis shall be completed consistent with Standard Urban Stormwater Mitigation Plan regulations, as specified in the county department of public works Hydrology Manual as amended. The hydrological analysis shall be submitted to the director of public works for review and approval. The new grading that required the hydrologic analysis shall not occur until approval of the analysis by the director of public works.	The hydrologic analysis has not occurred to date because no oil field projects have triggered the requirement.
68	E.18	Water Management Plan. The operator shall comply with all provisions of a water management plan that has been approved by the director and the director of public works. The plan shall include best management practices, water conservation measures, the use of a drip irrigation system, and shall include provisions for the use of surface water runoff in the retention basins for dust suppression and landscaping. The plan shall also address the availability of reclaimed water for use at the oil field. The water management plan shall be reviewed by the operator every three years to determine if modifications to the plan are required. The operator shall make changes to the plan if requested by the director or the director of public works. Any modifications to the water management plan shall be submitted to the director and the director of public works for review and approval. The water management plan shall include any elements requested by the director or the director of public works. In addition, the operator shall comply with the water conservation measures and reporting requirements specified in Sections 20.09.020- 20.09.080, Title 20 of the County Code (Utilities).	The Water Management Plan was initially submitted in May 2009 and was formally approved by County Public Works on August 8, 2012 and the County DRP on September 13, 2012. The County has not required any changes to the Plan since then. FM O&G reviewed the Water Management Plan on 09/11/15 and determined that no changes are necessary.

#	CSD Section/ Plan	CSD Language	Compliance Description
69	E.19 G.7 (2015)	<p>E.19: Groundwater Monitoring. The operator shall develop, implement, and carry out a groundwater quality monitoring program for the oil field that is acceptable to the director and consistent with all requirements of the Regional Water Quality Control Board. Pursuant to the approved program, the operator shall install and maintain groundwater monitoring wells in the vicinity of each surface water retention basin, which is permitted by the Regional Water Quality Control Board. Such monitoring wells shall be completed to the base of the permeable, potentially water bearing, alluvium, Lakewood Formation, and San Pedro Formation, and to the top of the underlying, non-water bearing Pica Formation, as determined by a California-certified professional geologist. The Regional Water Quality Control Board and the director shall be regularly advised of the results of such monitoring and shall be immediately advised if such monitoring indicates a potential problem.</p> <p>G.7: The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "the Operator coordinate with the RWQCB and install additional groundwater monitoring wells if deemed necessary."</p>	<p>Quarterly groundwater sampling was conducted on a quarterly basis consistent with the provisions of the Groundwater Monitoring Program and Work plan, and monitoring reports were submitted to DRP and the Los Angeles Regional Water Quality Control Board (RWQCB) quarterly.</p> <p>As noted in G.7 (2015), the RWQCB submitted a comment letter to DRP on 10/17/12 regarding the 2013 Annual Drilling Plan (E.26.c) that recommended the installation of "an up-gradient groundwater quality monitoring well (or network) that can establish water quality conditions at the perimeter of the field."</p> <p>Subsequently, in 2013, the RWQCB evaluated the field's groundwater monitoring program as part of the land treatment unit permit renewal process. The permit was amended from the prior 2010 permit to reflect the following:</p> <ul style="list-style-type: none"> <li>• Shallow wells for semi-annual monitoring (rather than the quarterly monitoring previously required in the 2010 permit) include MW-2, 3, 5, 6, 7, 8 and 9;</li> <li>• A new requirement for deep well annual monitoring of MW 11B and 13.</li> <li>• A new requirement to conduct statistical analysis of the results of the groundwater quality monitoring to identify background conditions, and changes from background conditions (if any). Regulatory action triggers were established in the event that changes from background conditions are detected.</li> </ul> <p>As such, through the 2013 land treatment unit permit renewal process, the RWQCB re-evaluated and on 2/7/13 approved the groundwater monitoring program with changes as iterated above that respond to their concerns in their 10/17/12 comment letter. Therefore, this periodic review recommendation has been fulfilled.</p>
70	E.20 G.7 (2015)	<p>Fencing. All portions of the oil field on which oil operations are conducted shall be enclosed with a fence compliant with DOGGR regulations codified at California Code of Regulations Title 14, Article 3, sections 1778 and 1779, or as may be subsequently amended by the state.</p> <p>G.7: The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "the ECC and the Operator increase monitoring of the condition of the perimeter fencing and conduct any necessary repairs as soon as possible.</p>	<p>The Inglewood Oil Field is enclosed by fencing and gates compliant with the regulations cited in this provision. Both FM O&amp;G and the ECC monitored the perimeter fencing on a regular basis to ensure the integrity of the fencing is maintained.</p>
71	E.21.a SA.12	<p>E.21.a: Equipment Removal. All facilities that have reached the end of their useful economic life shall be properly decommissioned and removed from the oil field within one year. Areas not slated for future use shall be restored and revegetated within 90 days of termination of use, unless such restoration and revegetation would interfere with fire safety or access to oil operations.</p> <p>SA.12: Clean-Up Plan. The CSD requires PXP to decommission and remove facilities that have reached the end of their useful economic life (County Code section 22.44.142.E.21.a) and submit to the County for its approval an unused or abandoned equipment removal plan (County Code section 22.44.142.L.14). PXP has submitted such a plan in 2009 and shall periodically update the plan should additional equipment, not identified in PXP's original removal plan, become unused or abandoned. Equipment and materials not necessary to oil field operations as identified by the Director of Planning shall be promptly removed from view of Sensitive Developed Areas as addressed in the plan.</p>	<p>The equipment removal plan was updated through December 2013 and submitted to DRP on 3/3/14.</p>

#	CSD Section/ Plan	CSD Language	Compliance Description
72	E.21.b	Equipment Maintenance. All equipment, improvements, facilities, and other personal property or fixtures located on the oil field shall be maintained in good condition to the satisfaction of the director and the director of public works.	Equipment at the oil field is inspected and maintained by the field operations staff with operators completing rounds of the facility daily.
73	E.21.c	Site Debris and Vegetation. The operator shall keep the property free of debris and vegetation overgrowth to the satisfaction of the director. All outside storage of parts or equipment shall comply with Part 7 of Chapter 22.52 of the County Code.	The Inglewood Oil Field is kept free of debris and vegetation overgrowth.
74	E.22	Security. All unmanned entrances to the oil field shall be equipped with sliding gates which shall be kept closed at all times except when authorized vehicles are entering or leaving the oil field. The operator shall have a security guard on duty 24 hours per day.	All gates at the oil field are consistent with these regulations and all unmanned entrances are equipped with the required sliding type gates.
75	E.23	Vehicle Parking. Vehicular parking shall comply with Part 11 of Chapter 22.52 of County Code.	All vehicle parking complies with the referenced code.
76	E.24.a	Sanitation. The operator shall comply with the following provisions: a. Garbage and Refuse. The oil field shall be maintained in a clean, sanitary condition, free from accumulations of garbage, refuse, and other wastes.	The field is maintained in accordance with this provision. Garbage and refuse are picked up and removed weekly by a subcontractor garbage collection company.
77	E.24.b	Toilets and Wash Facilities. Sanitary toilet and washing facilities shall be installed at any site where personnel are permanently stationed. Portable facilities shall be provided wherever crews are temporarily employed. Such facilities shall be maintained in a clean and sanitary condition at all times.	Permanent toilet and wash facilities are located at the office building, the warehouse, the gas plant, the "halfway house" across from the gas plant, and at two modular buildings used by sub-contractors. The restroom facilities are maintained by a sub-contractor janitorial service. Portable facilities are located throughout the field and moved as needed, the portable restrooms are maintained by the subcontractor providing the units.
78	E.25	Storage of Hazardous Materials. The operator shall comply with all provisions of a hazardous materials business plan that has been submitted to the fire chief. The operator shall deliver to the fire chief for review and approval an updated hazardous material business plan on an annual basis. This plan shall provide the location of where hazardous materials are stored at the oil field. Hazardous materials shall be stored in an organized and orderly manner and identified as may be necessary to aid in preventing accidents, and shall be reasonably protected from sources of external corrosion or damage to the satisfaction of the fire chief.	The annual Hazardous Materials Business Plan was submitted to the LA County Fire Chief on 01/04/16.
79	E.26.a	DOGGR Regulations. All DOGGR regulations related to drilling, redrilling, and reworking operations.	Drilling, redrilling and reworking operations are in compliance with all applicable DOGGR regulations; however, no drilling or redrilling occurred in 2015.
80	E.26.b SA 3	E.26.b: Number of Drilling and Redrilling Rigs. No more than three drilling or redrilling rigs shall be present within the oil field at any one time. SA 3: Notwithstanding the CSD's allowance for operations of a maximum of three drill rigs at any one time on the Oil Field, PXP shall limit to two the number of drill rigs in use at any one time.	The approved 2015 and 2016 Drilling Plans required per Section E.26.c limits FM O&G to two drilling rigs, and no more than two drilling rigs have been - or plan to be - used at any one time on the Oil Field.
81	E.26.c SA 1	Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan. Before the end of each calendar year, the operator shall develop and deliver to the director an annual drilling, redrilling, well abandonment, and well pad restoration plan, which shall describe all drilling, redrilling, well abandonment, and well pad restoration activities that may be conducted during the upcoming calendar year. Drilling and redrilling shall be scheduled to avoid over concentration of such activities in that year in any one area if located near a developed area. The operator may at any time submit to the director proposed amendments to the then current annual plan. No drilling, redrilling, or abandonment activity may be commenced unless it is described in a current annual plan (or an amendment thereto) which has been approved by the director. The annual plan (and any amendments) shall be provided to the CAP for review and comment. All comments on the annual plan from the CAP shall be submitted to the director in writing, and, if timely submitted, will be considered as part of the director's review and approval. The director shall complete the review of the annual plan (and any amendments) within 45 days of receipt, and shall either approve the annual plan or provide the operator with a list of deficiencies. The annual plan shall comply with the provisions of this subsection, and shall include the following:....	The 2015 Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan (Plan) was submitted to the County on 09/03/14 and was approved on 10/23/14. The 2016 Plan was submitted to the County on 09/17/15 and was approved on 11/09/15.

#	CSD Section/ Plan	CSD Language	Compliance Description
82	E.26.c SA 1	1. Slant Drilling. a. Deep Zone Wells. b. Mid-Zone Wells. c. Shallow Wells. d. Supplement Review. e. Definitions f. Environmental Consideration. g. Non-interference.	Neither the 2015 or 2016 Drilling Plans included any Deep zone or Mid zone wells that would be subject to a supplement review.
83	E.26.d	Drill Rig Engines. All engines used for drilling and re-drilling operations shall be operated by muffled internal-combustion engines or by electric motors.	No drilling or re-drilling activities occurred in 2015.
84	E.26.e	Fire Safety Regulations. All drilling, re-drilling, and reworking shall be in conformance with applicable fire and safety regulations.	No drilling or re-drilling activities occurred in 2015.
85	E.26.f SA 6	E. 26.f: New Technology. Proven reasonable and feasible technological improvements which are capable of reducing the environmental impacts of drilling and re-drilling shall be considered as they become, from time to time, available. SA 6: Clean Technology Assessment. The CSD requires PXP to consider proven reasonable and feasible technological improvements which are capable of reducing the environmental impacts of drilling and re-drilling. (County Code section 22.44.142.E.26.f) The CSD also requires that the Annual Drilling Plan include a discussion of the latest equipment and techniques that are proposed for use as part of its drilling and re-drilling program to reduce environmental impacts. (County Code section 22.44.142.E.26.c.ix) Pursuant thereto, PXP shall address in each Annual Drilling Plan the availability and feasibility of the use of natural gas-powered drill rigs or other technology capable of reducing environmental impacts, for the drilling of wells proposed in the Annual Drilling Plan (collectively "Clean Technology"). During the Periodic Review provided in 22.44.142.G.7, the County will evaluate such technology for brand new equipment that PXP intends to lease, acquire or otherwise use and require PXP to implement such technology to the extent the technology is feasible and available on a commercially reasonable basis.	New technology for reducing the environmental impacts of drilling and re-drilling is discussed in the annual drilling plans required per E.26.c. The discussion includes an applicability overview of electric rigs, coil tubing rigs, diesel, electric rigs, and natural gas-electric rigs along with the potential feasibility of their use at the Inglewood Oil Field.
86	E.26.g	Derricks and Portable Masts. All derricks and portable masts used for drilling, re-drilling, and reworking shall meet the standards and specifications of the American Petroleum Institute as they presently exist or as may be amended.	No drilling or re-drilling activities occurred in 2015.
87	E.26.h	Equipment Removal. All drilling and re-drilling equipment shall be removed from the site within 90 days following the completion of drilling or re-drilling activities unless the equipment is to be used at the oil field within five days for drilling or re-drilling operations.	No drilling or re-drilling activities occurred in 2015.
88	E.26.i	Drill Site Conditions. All drilling sites shall be maintained in a neat and orderly fashion.	No drilling or re-drilling activities occurred in 2015.
89	E.26.j	Belt Guards. Belt guards shall be required over all drive belts on drilling, re-drilling, and reworking equipment. Guarding shall be as required by Title 8 of the California Code of Regulations, section 6622, or as may be subsequently amended.	No drilling or re-drilling activities occurred in 2015.
90	E.26.c.x G.7 (2015)	E.26.c.x: The annual plan shall include the following: A topographic vertical profile showing proposed location of new wells that reflects local terrain conditions and that addresses the potential visibility of existing and proposed wells and other production facilities from residential and recreation areas. G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that the consideration of "considering removing the subject figures/maps from the Annual Drilling Plan until the information is deemed useful for inclusion in future plans."	The 2016 Drilling Plan was submitted on 9/17/15. The related recommendation resulting from the Final 2015 Periodic Review was not formalized until 10/28/15; hence, the topographic vertical profiles were included in the 2016 plan. They will not be included in the 2017 Drilling Plan.
91	E.27.a	Limits on Processing Operations. Unless otherwise expressly required by DOGGR, the only processing operations permitted at the well site shall be the dehydration of oil and gas produced from the well; the storage, handling, recycling, and transportation of such materials; and those processing operations required for water injection purposes.	In 2015, the only processing that occurred at the oil field was associated with the dehydration of oil and gas; the storage, handling, recycling, and transportation of those materials; and water injection operations.
92	E.27.b	Refining. No refining shall be conducted within the oil field.	In 2015, no refining occurred within the oil field.
93	E.27.c	Well Pump Motors. All well pumping units shall be operated by electric motors.	In 2015, all well pump motors at the oil field were powered electrically.



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94	E.27.d	Well Pumps. Downhole submersible pumps and low-profile pumping units for production wells must be used wherever feasible.	In 2015, downhole submersible pumps and low-profile pumping units for production wells were used wherever feasible.
95	E.27.e	Removal by Pipeline Only. All oil, gas, and other hydrocarbons produced from any well in the oil field shall be shipped and transported through pipelines, except in case of an emergency or when access to a pipeline becomes unavailable. Excluded from this requirement are propane and other related natural gas liquids that are in amounts in excess of what can be blended into the pipeline. Should any pipeline through which oil or gas is currently transported become unavailable for the safe transportation of said products due to maintenance problems with the pipeline, or lack of sufficient capacity within the pipeline to handle the volume of oil and gas needing transportation, or because the owner or operator of such pipeline elects to discontinue transporting oil or gas through such pipeline, then the operator shall within 180 days of the date the existing pipeline becomes unavailable, seek to acquire a private right of way or easement, or shall file an application for a right of way, easement, encroachment permit, or franchise for the construction of a replacement pipeline and shall diligently prosecute such application until such pipeline is completed. During any emergency situation, or during such time as any existing pipeline becomes unsafe or unavailable, oil and gas may be transported by truck until the emergency situation is resolved or until a replacement pipeline shall be permitted and constructed in compliance with all applicable laws and regulations.	In 2015, all oil, gas, and other hydrocarbons produced in the oil field were shipped and transported via pipelines, and all natural gas liquids were blended into the oil and transported by pipeline.
96	E.27.f	Pipelines. The operator shall comply with the following provisions: i. New pipelines that remove oil or gas from the oil field shall be buried below the surface of the ground; ii. All pipelines which are not enclosed within a fence shall be placed underground or covered with materials approved by the fire chief. Said covers shall be maintained in a neat, orderly, and secure manner; iii. Any and all water or brine produced during pipeline construction shall either be injected in accordance with DOGGR requirements, or disposed of in accordance with other local, state or federal regulations; iv. New pipeline corridors shall be consolidated with existing pipelines or electrical transmission corridors where feasible; and v. Upon completion of pipeline construction, the site shall be restored to the approximate previous grade and condition.	No new pipelines that transport oil or gas from the oil field have been constructed since the adoption of the CSD. The oil field is completely fenced in with chain link fencing that meets the DOGGR requirements, thus all oil field pipelines are also enclosed by a fence. All water or brine generated at the oil field is injected in accordance with DOGGR requirements. Pipeline construction within the oil field is consolidated to the maximum feasible in existing pipeline routes and corridors.
97	E.27.g	Active Pipeline Plot Plan. The operator shall submit to the fire chief a plot plan depicting the approximate location of all active pipelines regulated by the United States Department of Transportation or California State Fire Marshal owned by the operator that are located outside the outer boundary line, including waste water, and trunk and gathering lines to transport oil or petroleum products. The plot plan shall be submitted within 30 days of the installation of any new pipelines or the relocation of an existing pipeline.	The active pipeline plot plan was submitted to the Fire Department on December 9, 2009 and has not been required to be updated to date.
98	E.27.h	Machinery Enclosures. The operator shall maintain enclosures around machinery with moving parts consisting of a fence, screening, or housing. Said enclosures shall be installed in compliance with Section 11.16.020, Title 11 of the County Code.	In 2015, all enclosures around machinery subject to this provision were maintained in compliance with Section 11.16.020, Title 11 of the County Code.
99	E.27.i	Opening Protections. The operator shall cap, close, or protect the openings in all oil wells, test holes, and similar excavation in compliance with Section 11.54.010, Title 11, of the County Code.	In 2015, all openings in all oil wells, test holes, and similar excavation in compliance were capped, closed, or protected in compliance with Section 11.54.010, Title 11, of the County Code.
100	E.28.a	a. DOGGR Regulations. The operator shall comply with all DOGGR regulations related to well reworking operations.	In 2015, all DOGGR regulations related to well reworking operations were complied with.
101	E.28.b G.7 (2015)	E.28.b: Number of Reworking Rigs. No more than eight reworking rigs shall be present within the oil field at any one time, unless an emergency condition requires additional Reworking rigs. This does not include equipment used for well maintenance or well abandonment. G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "the Operator facilitate better coordination when scheduling reworking and the other types of rigs at the oil field to avoid concentrating too many rigs in one area.	In 2015, no more than eight reworking rigs were present on the oil field at any one time not including equipment used for well maintenance and well abandonment. Since issuance of the associated recommendation from the Final 2015 Period Review Final Report, FM O&G has ensured that reworking rigs are not overconcentrated in one area.



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102	E.28.c	Hours of Operation. With exception of emergencies, well reworking operations shall not be allowed after 7:00 p.m. or before 7:00 a.m., nor on Sundays or legal holidays.	In 2015, reworking rigs did not operate outside 7:00 am to 7:00 pm or on Sundays or legal holidays except in emergencies.
103	E.28.d	Specifications. Reworking rigs shall meet the standards and specifications of the American Petroleum Institute.	In 2015, all reworking rigs met the standards and specifications of the American Petroleum Institute.
104	E.28.e	Equipment Removal. Reworking rigs shall be removed from the oil field within seven days following the completion of reworking operations unless such rig will be used on another well at the oil field within five days.	In 2015, all reworking rigs were removed from the oil field within seven days following completion of the operations unless it was scheduled for use at another well within five days.
105	E.29.a	New Tank Specifications. All new tanks and appurtenances shall be designed, constructed, installed, and maintained in accordance with current County Fire Code, American Petroleum Institute, DOGGR, California Division of Industrial Safety, Environmental Protection Agency Standards, applicable provisions of Title 14 of the California Code of Regulations section 177.4, and applicable CalARP Program requirements.	No new tanks were constructed in 2015.
106	E.29.b	Setbacks. No new storage Tank, excluding a replacement tank, shall be constructed closer than 500 feet from any developed area, or closer than 200 feet from a public road. No building shall be constructed within 50 feet of any oil storage tank.	No new tanks were constructed in 2015. No new buildings were constructed within 50 feet of any oil storage tank in 2015.
107	E.29.c	Vapor Recovery. Oil, wash, and produced water tanks shall be vapor tight and shall be equipped with a vapor recovery system.	In 2015, all oil, wash and produced water tanks were vapor tight and equipped with a vapor recovery system.
108	E.29.d	Specifications for New Tank Piping, Valves, Fittings, and Connections. All new tank piping, valves, fittings, and connections including normal and emergency relief venting, shall be installed and maintained in accordance with current American Petroleum Institute standards to the satisfaction of SCAQMD and DOGGR.	In 2015, all equipment covered by this provision were installed and maintained in accordance with current API standards to the satisfaction of SCAQMD and DOGGR.
109	E.29.e	Detection of Tank Bottom Leaks. The operator shall design, implement, and comply with a program, approved by the fire chief, for controlling and detecting tank bottom leaks on all tanks at the oil field. The operator may use a combination of methods including but not limited to diversion walls, dikes, tank foundations of concrete or gravel, and a tank bottom leak detection system in compliance with Title 14 of the California Code and Regulations section 177.3, or subsequently enacted state regulations regarding tank bottom leaks.	All tanks at the Inglewood Oil Field have a program to detect tank bottom leaks as approved by the Fire Department on 2/18/10 in the Tank Leak Detection and Containment Plan.
110	E.30	Well and Production Reporting. The operator shall deliver annual production reports to the director and the fire chief. The reports shall provide the following information: a. A copy of all DOGGR Forms 110 and 110B submitted during the previous 12 months. b. Number and mapped location of wells drilled or redrilled, including well identification numbers. c. Number and mapped location of water injection wells, including well identification numbers. d. Number and mapped location of idled wells, including well identification numbers and the date each well was idled. e. Number and mapped location of abandoned wells, including date each well was abandoned and/or re-abandoned. f. Any additional information requested by the director or the fire chief.	The 2015 well and production reporting was submitted to the DRP and Fire Chief on 02/22/16.
111	E.31	Idle Well Testing and Maintenance. The operator shall comply with Title 14 of the California Code of Regulations section 1723.9 regarding testing and maintenance of idle wells, or subsequently enacted state regulations regarding testing and maintenance of idle wells. The operator shall carry out all additional tests, remedial operations, and mitigation measures required by DOGGR if any idle wells do not meet the test standards.	In 2015, all required testing and maintenance of idle wells was carried out in accordance with all applicable regulations.
112	E.32	Abandoned Well Testing. The operator shall conduct annual hydrocarbon vapor testing of areas within the oil field that contain abandoned wells. The testing shall be done using a soil gas vapor probe, or another method approved by the director. The results of the testing shall be submitted to the director and DOGGR on an annual basis. Abandoned wells that are found to be leaking hydrocarbons that could affect health and safety shall be reported to the director and DOGGR within 24 hours of the abandoned well test. If directed by DOGGR, the operator shall re-abandon the well in accordance with DOGGR rules and regulations. If the test results for an abandoned well area are at or below the background levels for two consecutive years that area shall thereafter be tested every five years.	The 2015 abandoned well testing was submitted to the DRP and DOGGR on 06/12/15.

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113	E.33	<p>Well and Well Pad Abandonment. If DOGGR orders the operator to plug and abandon any wells on the oil field, the operator shall deliver to the fire department, on a timely basis, all notices of intent to plug and abandon a well that the operator files with DOGGR and shall commence promptly and proceed diligently with the plugging and abandonment operations in accordance with DOGGR rules and regulations and the terms of the DOGGR permit to plug and abandon the well. Well abandonment may commence once all necessary permits and approvals are obtained. If the well pad associated with the abandoned well does not contain other production, injection, or idle wells, and will not be used for future drilling, then the operator shall promptly abandon the well pad consistent with the following provisions:</p> <p>Closure of Sumps. The operator shall clean out all sumps, cellars, and ditches, and level and fill all sumps and depressions pursuant to DOGGR requirements. If sumps are lined with concrete, bottoms and walls shall be broken up and removed. Sumps shall be closed in accordance with Regional Water Quality Control Board and California Department of Toxic Substances Control requirements.</p> <p>b. Well Pad Site Cleanup. The operator shall leave the site entirely free of oil, rotary mud, oil-soaked earth, asphalt, tar, concrete, litter, debris, and other substances to the satisfaction of DOGGR and in compliance with federal requirements.</p> <p>c. Contaminated Materials. All contaminated soils and materials within the well pad boundaries shall be removed and treated or disposed of in accordance with all local, county, State, and federal regulations.</p> <p>d. Well Pad Revegetation. The Well pad shall be revegetated following the requirement of the native habitat restoration plan.</p>	<p>DOGGR has not ordered any wells to be plugged or abandoned pursuant to this requirement. The oil field does not contain any sumps and sumps are no longer used at the oil field. Existing well pads have been cleaned up but are not scheduled for abandonment or restoration so they may be re-used to avoid the impact of developing new well pad areas.</p>
114	E.34	<p>County Request for Review of Well Status. The director may periodically review the status of the operator's wells and submit to DOGGR a list of wells the director believes should be plugged and abandoned as specified in Public Resources Code section 3206.5 or any subsequently enacted state law related to a local jurisdiction's right to request state-agency review of idle wells.</p>	<p>The County has not requested that DOGGR require the Operator to plug or abandon any wells pursuant to this provision.</p>
115	E.35 SA 14	<p>E.35: Reduced Throughput Triggering Review. When oil or gas throughput is less than 630 barrels per day, the director shall conduct a public hearing to determine if shut down of the oil field or other action are appropriate.</p> <p>SA 14: CSD Review Based On Reduced Production. When production drops to three percent of the estimated peak production of 21,000 barrels of oil per day, the County will review the CSD to consider whether modifications or closure of the Oil Field is necessary or appropriate or at such earlier date as the County determines appropriate.</p>	<p>The oil field has not reached the production levels that trigger this review and this provision has not been activated to date.</p>
116	E.36	<p>Abandonment Procedures. Within 180 days of permanent facility shut down, the operator shall submit an abandonment plan to DOGGR and submit to the director for review and approval a time line for facility removal, site assessment, and remediation as necessary. The operator shall begin abandonment of the site no later than 20 days after the director's approval of the timeline, and shall provide to the director quarterly updates on the abandonment process until such time as the oil field is abandoned and remediated. The operator shall post a performance bond to insure compliance with all provisions of this subsection and the operators and landowners shall continue to pay property taxes at the rates assessed during oil field operation until all site restoration work has been fully completed, as determined by the director.</p>	<p>The facility has not shut down; hence, this provision is not applicable to date.</p>

#	CSD Section/ Plan	CSD Language	Compliance Description
117	F.1.a, b	<p>Environmental Quality Assurance Program ("EQAP"). The operator shall comply with all provisions of an environmental quality assurance program that has been approved by the director. The following provisions relate to the EQAP:</p> <p>a. EQAP Requirements. The EQAP shall provide a detailed description of the steps the operator shall take to assure compliance with all provisions of this section, including but not limited to, all of the monitoring programs called for by this section.</p> <p>b. Annual EQAP Reports. Within 60 days following the end of each calendar year, the operator shall submit to the director an annual EQAP report that reviews the operator's compliance with the provisions of the EQAP over the previous year and addresses such other matters as may be requested by the director. The annual EQAP report shall include the following:</p> <p>i. A complete list and description of any and all instances where the provisions of the EQAP, or any of the monitoring programs referred to therein or in this section, were not fully and timely complied with, and an analysis how compliance with such provisions can be improved over the coming year.</p> <p>ii. Results and analyses of all data collection efforts conducted by the operator over the previous year pursuant to the provisions of this section.</p>	<p>This 2015 annual EQAP report was submitted on 02/29/16 in compliance with this provision.</p>
118	F.1.c	<p>EQAP Updates. The EQAP shall be updated as necessary and submitted to the director for approval along with the annual EQAP report. The EQAP updates shall be provided to the CAP and MACC for review and comment. Comments from the CAP and MACC, if timely received, shall be considered by the director before making a decision to approve the same. The director shall complete the review of EQAP updates as soon as practicable, and shall either approve the updated EQAP or provide the operator with a list of specific items that must be included in the EQAP prior to approval. The operator shall respond to any request for additional information within 30 days of receiving such request from the director, unless extended by the director.</p>	<p>The EQAP was approved by the County in February 2009 and was revised on August 25, 2009. No updates have been necessary to date.</p>
119	F.2	<p>Environmental Compliance Coordinator. The operator shall recommend and fund the environmental compliance coordinators. The number of environmental compliance coordinators shall be determined by the county and shall take into account the level of oil operations at the oil field. The environmental compliance coordinator(s) shall be approved by, and shall report to, the director. The responsibilities of the environmental compliance coordinator(s) shall be set forth in implementation guidelines that may be developed by the county for the oil field and shall generally include:</p> <p>a. On-site, day-to-day monitoring of construction or drilling and redrilling activities as determined by the director.</p> <p>b. Taking steps to ensure that the operator, and all employees, contractors, and other persons working in the oil field, have knowledge of, and are in compliance with all applicable provisions of this section.</p> <p>c. Evaluating the adequacy of drilling, redrilling, and construction impact mitigations, and proposing improvements to the operator or contractors and the county.</p> <p>d. Reporting responsibilities to the various county agencies with oversight responsibility at the oil field, as well as other agencies such as DOGGR, and SCAQMD.</p>	<p>An ECC position has been funded by the operator as required by this provision since the adoption of the CSD. The ECC site inspections are coordinated with oil field management to gain access to oil field staff, oil field contractors and for access to the oil field to check on the compliance provisions of the CSD. The ECC also participates in reviewing and commenting of all plans submitted by the Operator in compliance with the CSD.</p>
120	F.3.a	<p>Safety Inspection, Maintenance, and Quality Assurance Program ("SIMQAP"). The operator shall comply with all provisions of a safety inspection, maintenance, and quality assurance program that has been approved by the director and the fire chief.</p> <p>a. SIMQAP Requirements. The SIMQAP shall, at a minimum provide for:</p> <p>i. Inspection of construction techniques;</p> <p>ii. Regular maintenance and safety inspections;</p> <p>iii. Periodic safety audits;</p> <p>iv. Corrosion monitoring and leak detection; and</p> <p>v. Inspections of all trucks carrying hazardous and/or flammable material prior to loading.</p>	<p>The SIMQAP was approved on 4/13/11, is implemented and ongoing.</p>

#	CSD Section/ Plan	CSD Language	Compliance Description
121	F.3.b	SIMQAP Updates. The operator shall periodically review and revise the SIMQAP to incorporate changes in procedures, and new safety and maintenance technologies and procedures. The operator shall make such revisions at least every five years, or more frequently, if the operator determines changes are necessary or if requested by the director or the fire chief. The operator shall submit SIMQAP updates to the director and the fire chief for their review and approval. The director shall complete the review of SIMQAP updates as soon as practicable, and shall either approve the updated SIMQAP or provide the operator with a list of specific items that must be included in the SIMQAP prior to approval. The operator shall respond to any request for additional information within 30 days of receiving such request from the director, unless extended by the director.	The SIMQAP was approved on 4/13/11. To date, no revisions to the SIMQAP have been necessary.
122	F.3.c	Worker Notification. The operator shall ensure that all persons working on the oil field comply with all provisions of the currently approved SIMQAP.	All persons working on the oil field in 2015 received SIMQAP training.
123	F.3.d	Inspections. The SIMQAP shall provide for involvement of county staff or the environmental compliance coordinator in all inspections required by this section.	The approved SIMQAP provides for the involvement of County staff or the ECC in all required inspections.
124	F.4	Annual Emergency Response Drills of the County and Culver City Fire Departments. The operator shall demonstrate the effectiveness of the emergency response plan by responding to one planned emergency response drill per year which shall be conducted in conjunction with the county and Culver City fire departments. Emergency response drills required by other agencies that involve the county and Culver City fire departments can be used to satisfy this provision. In addition, the operator shall demonstrate the effectiveness of the emergency response plan by responding to not more than two unannounced drills each year which may be called by the county fire department at the oil field. If critical operations are then underway at the oil field, the operator need not respond to a unannounced drill to the extent such a response would, as a result of such critical operations, create an undue risk of personal injury or property damage, but in such case the operator must promptly explain the nature of the critical operations, why response is not possible, and when the critical operations will be completed.	The 2015 emergency response drill was conducted on November 5, 2015. Representatives from both LA County and Culver City Fire Departments were invited to attend the drill, and Culver City Fire Department representatives attended. The County ECC and representatives from the California Department of Fish and Wildlife also attended and participated in the drill.
125	F.5	Noise Monitoring. The public health department shall retain an independent qualified acoustical engineer to monitor ambient noise levels in the areas surrounding the oil field as determined necessary by the director or the director of public health. The monitoring shall be conducted unannounced and within a time frame specified by the director or the director of public health. Should noise from the oil operations exceed the noise thresholds specified in this section, no new drilling or redrilling permits shall be issued by the county until the operator in consultation with the director and director of public health identifies the source of the noise and the operator takes the steps necessary to assure compliance with thresholds specified in this section. The results of all such monitoring shall be promptly posted on the oil field web site and provided to the CAP.	No exceedances of the noise regulations in the County Code or of the noise limits specified subsection E.5.a of the CSD have been reported to FM O&G by the DPH.
126	F.6	Vibration Monitoring. The public health department shall retain an independent qualified acoustical engineer to monitor vibration in the areas surrounding the oil field as determined necessary by the director or the director of public health. The monitoring shall be conducted unannounced and within a time frame specified by the director or the director of public health. Should vibration from the oil operations exceed the vibration thresholds specified in this section, no new drilling or redrilling permits shall be issued by the county until the operator in consultation with the director and director of public health identifies the source of the vibration and the operator takes the steps necessary to assure compliance with thresholds specified in this section. The results of all such monitoring shall be promptly posted on the oil field web site and provided to the CAP. A telephone number by which persons may contact the operator at all times to register complaints regarding oil operations shall be posted in the main entrance sign to the facility and included in the annual newsletter required by subsections J.2.b and on the oil field web site required by subsection J.2.c.	No exceedances of the vibration criteria specified in subsection E.6. of the CSD have been reported to FM O&G by DPH.

#	CSD Section/ Plan	CSD Language	Compliance Description
127	F.7	Complaints. All complaints related to oil operations received by the operator shall be reported on the same business day to the environmental compliance coordinator and to the director. In addition, the operator shall maintain a written log of all complaints and provide that log to the director, the MACC, and CAP on a quarterly basis. Depending upon the nature of the complaint, the operator shall report the complaint to the SCAQMD, DOGGR, and any other appropriate agencies with oversight authority regarding the complaint at issue. If the complaint is received after normal business hours, it shall be reported to the environmental compliance coordinator and the agencies at the opening of the next business day.	All complaints received were reported to the ECC, DRP as well as other appropriate agencies with oversight of the matter in compliance with the timing of this policy. Quarterly complaint logs were submitted to the ECC and the DRP quarterly and are posted at <a href="http://www.inglewoodoilfield.com">www.inglewoodoilfield.com</a> .
128	G.1	Costs of Implementing Monitoring and Enforcing Conditions. The operator shall be fully responsible for all reasonable costs and expenses incurred by the county or any county contractors, consultants, or employees, in implementing, monitoring, or enforcing this section, including but not limited to, costs for permitting, permit condition implementation, mitigation monitoring, reviewing and verifying information contained in reports, undertaking studies, research and inspections, administrative support, and including the fully burdened cost of time spent by county employees on such matters.	FM O&G has made timely payments on all CSD monitoring and enforcement costs to the County through the draw down account required by CSD Provision G.2. All costs from the implementation of the CSD, permit processing, mitigation monitoring, compliance report research, review and verification, inspections, and administrative costs have been paid by the FM O&G from this account.
129	G.2	Draw-Down Account. The operator shall maintain a draw-down account with the department of regional planning from which actual costs will be billed and deducted for the purpose of defraying the expenses involved in the county's review and verification of the information contained in any required reports and any other activities of the county, including but not limited to, enforcement, permitting, inspection, coordination of compliance monitoring, administrative support, technical studies, and the hiring of independent consultants. The initial amount to be deposited by the operator shall be \$500,000. In the first year, if withdrawals from the account have reduced its balance to less than 50 percent of the amount of the initial deposit (\$250,000), the operator shall deposit \$50,000 in supplemental funds within 30 business days of notification. After the first year, if the balance in the draw-down account is reduced at any time to \$50,000, the operator shall deposit \$50,000 in supplemental funds on each occasion that the account is reduced to \$50,000 or less within 30 business days of notification. There is no limit to the number of supplemental deposits that may be required. At the discretion of the operator, the amount of an initial or supplemental deposit may exceed the minimum amounts specified in this subsection. The director may, from time to time, increase the minimum \$50,000 figure to account for inflation or the county's experience in obtaining funds from the account.	The draw-down account has been maintained at or above the \$50,000 balance as required by this requirement. The only deposit to the account in 2015 occurred on 09/25/15.
130	G.3	Indemnification. The operator shall enter into an agreement with the county to indemnify and hold harmless the county, its elected and appointed officials, agents, officers, and employees from any claim, action, or proceeding for damages arising from its oil operations, including water, air or soil contamination, health impacts, or loss of property value during the oil operations, well abandonment, and post-abandonment activities with terms approved by, and in a form acceptable to, the CEO.	The required agreement was documented in a letter signed by the operator and the County dated November 12, 2009, the agreement is on file with the County.
131	G.4	Insurance Requirements. Within 90 days following the effective date of the ordinance creating this section or such later time as may be approved by the director for good cause shown, and without limiting the operator's indemnification of the county as required in the preceding subsection, the operator shall provide evidence of insurance coverage that meets county requirements as required and approved by the CEO including identifying the county and its elected and appointed officers and employees as additional insureds. Such coverage shall be maintained so long as oil operations are conducted within the district and until such time as all abandonment requirements are met and certified by the appropriate local, state, and federal agencies. Such insurance coverage shall include but is not necessarily limited to the following: general liability, auto liability, professional liability, and environmental impairment liability coverage insuring clean-up costs and endorsing for Sudden and Accidental contamination or pollution. Such coverage shall be in an amount sufficient to meet all applicable state and federal requirements, with no special limitations. At the operator's request and only with county approval by the CEO, the operator may self-insure all or any part of the above coverage obligations in lieu of purchasing commercial coverage. These insurance requirements shall be in addition to all other indemnification, insurance and performance security required by federal, state, and local regulations and permits.	PXP, the operator at the time of CSD adoption, provided the County with an insurance policy meeting the liability and environmental impairment liability requirements of this provision on January 18, 2010. FM O&G, updated this insurance to reflect the change in operator on June 25, 2013.

#	CSD Section/ Plan	CSD Language	Compliance Description
132	G.5.a	Performance Bond. Prior to issuance of the first drilling or redrilling permit pursuant to this section, the operator shall provide to the department of regional planning a faithful performance bond or financial instrument in the sum to be determined by the CEO, payable to the county and executed by a corporate surety acceptable to the county and licensed to transact business as a surety in the state of California. Such bond shall be conditioned upon the faithful performance by the operator of duties related to well abandonment, site restoration, and environmental cleanup and shall be in a format and include terms approved by the CEO.	PXP, the operator at the time of CSD adoption, provided the County with a performance bond issued by an acceptable corporate surety licensed to transact business in the state of California on September 29, 2009. FM O&G, updated this bond to reflect the change of operator on June 25, 2013.
133	G.5.b	Change of Operator. The performance bond shall continue in force for one year following any sale, transfer, assignment, or other change of operator of the oil field, or of the current operator's termination of activities at the oil field. The county may release said bond prior to the end of the one-year period upon satisfaction by the operator of all its obligations. Notwithstanding the foregoing, the performance bond shall not be terminated or released upon the sale, transfer, assignment, or other change of operator until the new operator has delivered a replacement bond complying with the provisions of this subsection G.	There was no change of operator in 2015.
134	G.5.c	Funding Options. At its sole option, the county may accept certificates of deposit, cash deposits, or U.S. government securities in lieu of commercial bonds to meet the above bonding requirements on terms approved by the CEO.	This provision is not applicable since FM O&G provided a performance bond in accordance with G.5.a.
135	G.6	Other Obligations. The insurance, indemnification, and performance security requirements in subsections G.3, G.4, and G.5 shall be in addition to all other indemnification, insurance, and performance security required by federal, state and local regulations, and permits.	The condition is administrative in its intent and is fully implemented.
136	G.7	<p>Periodic Review. The county shall conduct a comprehensive review of the provisions of this section at least every five years to determine if the provisions of this section are adequately protecting the health, safety, and general welfare. Such reviews shall, among other things, consider whether additional provisions should be added, appended, or removed. One of the main goals of the periodic review shall be to evaluate if proven technological advances that would further reduce impacts of oil operations on neighboring land uses should be incorporated into the provisions of this section.</p> <p>a. Review Requirements. Each review shall include a report by a hearing officer designated by the director, which shall be prepared after public notice and an opportunity for public comment. The report shall include a comprehensive analysis of the effectiveness of this section, and shall review and consider enforcement activity, operational records, and any other issues relating to oil operations. The report, at the option of the county, may include a survey of residents near the oil field regarding noise, odors, vibrations, and other issues requested by the director of public health. A draft of the report shall be provided to the CAP and the operator for review and comment. All comments on the draft report from the CAP and the operator shall be submitted to the hearing officer in writing, and will be considered, if timely received, before the report is finalized. The final report by the hearing officer shall include a recommendation as to whether the director should prepare proposed amendment to this section for submission to the board of supervisors.</p> <p>b. Early Reviews. At the discretion of the director, reviews of this section may be conducted more frequently than every five years. Without limiting such discretion, the director shall consider whether an early review should be undertaken if more than three material violations occur within any 12-month period.</p> <p>c. Initial Review. The initial review shall occur no sooner than three years and no later than five years after the effective date of the ordinance establishing this section unless the director determines that such initial annual review shall occur at an earlier time pursuant to subsection b, above.</p>	The County released a five year review report in February 2014. The draft report was circulated for review and comment to both the CAP, members of the public, other agencies and the operator. Comments on the draft report were considered in the preparation of the administrative final draft released on 06/25/15. The administrative final draft was discussed at the July 2015 CAP meeting, and on 09/24/15, the final draft was issued. The report was prepared consistent with the five year time frame requirement stipulated in CSD Provision G.7.c. On 10/28/15, the County issued a letter to FM O&G verifying that the Periodic Review Final Report dated September 2015 concluded that the provisions of the CSD have been effective and that no modification to the current language of the CSD is recommended. The report, however, identified ten recommendations to strengthen implementation procedures of the CSD. Eight of the ten recommendations are FM O&G's responsibility to implement, and compliance with each recommendation is discussed in the related CSD section row within this document.

#	CSD Section/ Plan	CSD Language	Compliance Description
137	G.8	<p>Multiple Agency Coordination Committee ("MACC"). A MACC shall be established to coordinate activities and communications between the various agencies with regulatory authority over the oil operations within the district. While each agency will continue to make its own decisions with regard to their respective areas of authority, the MACC will allow for collection and analysis of data and for discussion of both strategic evaluations and enforcement actions taken by the various agencies at the oil field.</p> <p>a. MACC Members. The director shall establish a MACC that includes representatives from the following agencies: the county department of regional planning, the county fire department, the county department of public works, and the county department of public health. The SCAQMD, the Regional Water Quality Control Board, DOGGR, and Culver City fire department shall be invited to appoint a representative from their agency as a member of the MACC.</p> <p>b. MACC Chair. The director or his designee shall chair the MACC meetings and shall coordinate all MACC activities including scheduling and keeping minutes of MACC meetings.</p> <p>c. MACC Meetings. The MACC shall determine its meeting schedule.</p> <p>d. Documents Provided to the MACC. Copies of all monitoring and compliance reports, plans, and other documents that are requirements of this section shall be submitted to the MACC.</p>	<p>A MACC was established in 2009, and the MACC conducts periodic meetings. All monitoring and compliance reports are provided to the MACC.</p>
138	G.9	<p>Related County Code Provisions. The county code contains a number of provisions related to oil wells and oil field operations. Where the regulations of this section differ from any other provisions in the county code, these regulations shall supersede unless the contrary provisions are mandated by state law.</p>	<p>The provision is a standard County requirement to clarify jurisdiction on similar code and regulations.</p>
139	H.1 SA.4	<p>H.1: Director's Review Required. The operator shall apply for and receive approval of a director's review pursuant to the provisions of Part 12 of Chapter 22.56 prior to any new drilling and redrilling. New drilling and redrilling approved through a director's review procedure shall be limited to no more than 53 wells per year, with the maximum number of newly drilled wells of that total, limited to 45 per year, except that during the first year following the effective date of the ordinance establishing this section, new drilling and redrilling shall be limited to no more than 24 wells. Approval through director's review for drilling new wells shall be limited to 600 wells over 20 years, beginning on the effective date of this ordinance. Drilling and redrilling shall be planned to avoid over concentration of such activities in one area in any one year, if near developed areas. The director's review procedures shall also apply to emergency actions determined by the director as necessary to prevent an imminent hazard, or to other immediate measures required for the purposes of protecting health and safety. No new permits for drilling or redrilling shall be approved by the director unless the subject wells have been approved as part of an annual drilling plan as described in subsection E.26.c. Approval shall not be granted until copies of all related permits have been submitted to the director; other permits include, but are not limited to, the permits required by DOGGR, the county fire department, the county department of public works, the county sanitation district, RWQCB, SCAQMD, and other pertinent agencies identified by the director.</p>	<p>While no drilling or redrilling occurred in 2015, some wells approved in the 2015 Drilling Plan received DRP Site Plan approvals and included proof of applicable permits from DOGGR and/or the LA County Fire Department.</p>



#	CSD Section/ Plan	CSD Language	Compliance Description																														
140	H.1 SA.4	<p>SA.4: Number of wells. Notwithstanding the aggregate and annual well-drilling limits in the CSD, PXP shall comply with the following limits:</p> <p>a. Notwithstanding Section 22.44.142.H of the CSD, no more than 500 new wells (inclusive of Bonus Wells and wells drilled since approval of CSD) shall be drilled pursuant to the CSD (hereinafter "Director's Review") through October 1, 2028, or during the remaining life of the CSD, whichever is later.</p> <p>b. Until such time as PXP has drilled or redrilled 50 wells since the adoption of the CSD, or 24 months from the date of this Agreement, whichever is sooner ("Time Period One"), no more than 30 wells may be drilled or re-drilled in any calendar year pursuant to a Director's Review as set forth in the CSD (hereinafter Director's Review). At the end of Time Period One, and if the County determines, pursuant to its review of the CSD by the Director of Regional Planning, that the CSD has been effective in protecting the health, safety, and general welfare of the public, thereafter (the "Full Operational Period") no more than 35 wells may be drilled or re-drilled in the calendar year pursuant to Director's Review.</p> <p>c. In Time Period One, for each well abandoned within 800 feet of any Developed Area (the "800-foot zone") by PXP since adoption of the CSD and in full compliance with the California Department of Conservation's Division of Oil, Gas and Geothermal Resources ("DOGGR") standards for abandonment at the time of abandonment, PXP may drill two additional new wells outside of the 800-foot zone (hereinafter "Bonus Wells"), up to a maximum of 45 drilled and redrilled wells (30 wells plus 15 Bonus Wells) in any calendar year within Time Period One pursuant to Director's Review and subject to review and approval in the Annual Drilling Plan. Subject to the annual and aggregate limits on number of wells, Bonus Wells earned by abandonment may be drilled at any time during the life of the CSD.</p> <p>d. In the Full Operational Period, for each well abandoned within the 800-foot zone, PXP may drill two additional new wells outside the 800-foot zone up to a maximum of 53 drilled and re-drilled wells (35 wells plus 18 Bonus Wells) in that year pursuant to Director's Review and subject to review and approval in the Annual Drilling Plan. Subject to the aggregate and annual limits on number of wells, Bonus Wells earned by abandonment may be drilled at any time during the life of the CSD.</p> <p>e. The Developed Area as used in the CSD with respect to the 400-foot buffer zone (Section 22.44.142.E.) shall remain unchanged (static or fixed) from what it was determined to be on the effective date of the CSD.</p>	<p>Since inception of the CSD and following the installation of 50 new wells, the Settlement Agreement allows FM O&amp;G to apply to the County for approval to install up to 35 new wells per year. FM O&amp;G's predecessor applied for this well increase on October 10, 2011 and was granted approval by the County on December 12, 2011.</p> <p>Since inception of the CSD through June 30, 2014, 127 wells have been drilled and 32 wells have been abandoned; of which 20 were within 800 feet of Developed Areas.</p> <table border="1"> <thead> <tr> <th colspan="3">Number of Wells Drilled Since Inception of the CSD</th> </tr> <tr> <th>YEAR</th> <th>NUMBER OF WELLS</th> <th>BONUS WELLS USED</th> </tr> </thead> <tbody> <tr> <td>2009</td> <td>0</td> <td>0</td> </tr> <tr> <td>2010</td> <td>19</td> <td>0</td> </tr> <tr> <td>2011</td> <td>40</td> <td>5</td> </tr> <tr> <td>2012</td> <td>20</td> <td>0</td> </tr> <tr> <td>2013</td> <td>30</td> <td>0</td> </tr> <tr> <td>2014</td> <td>18</td> <td>0</td> </tr> <tr> <td>2015</td> <td>0</td> <td>0</td> </tr> <tr> <td><b>Total</b></td> <td><b>127</b></td> <td><b>5</b></td> </tr> </tbody> </table>	Number of Wells Drilled Since Inception of the CSD			YEAR	NUMBER OF WELLS	BONUS WELLS USED	2009	0	0	2010	19	0	2011	40	5	2012	20	0	2013	30	0	2014	18	0	2015	0	0	<b>Total</b>	<b>127</b>	<b>5</b>
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141	H.2 - 3	<p>H.2: Conditional Use Permit Required. Provided a conditional use permit has first been obtained as provided in Part 1 of Chapter 22.56, and while such permit is in full force and effect in conformity with the conditions of such permit, the following uses may be established:</p> <p>a. Drilling or redrilling that exceeds the maximum number allowed pursuant to a director's Review;</p> <p>b. Steam drive plant; and</p> <p>c. New tanks with a capacity of greater than 5,000 barrels.</p> <p>H.3: Conditional Use Permit Requirements. For those uses requiring a conditional use permit, in addition to the requirements of Part 1 of Chapter 22.56, the applicant shall substantiate to the satisfaction of the hearing officer that:</p> <p>a. The requested use is in compliance with the provisions of this section; and</p> <p>b. All reasonable measures were taken to reduce and minimize potential impacts from the proposed operation.</p>	No conditional use permits have been applied for/obtained.																														
142	H.4	Application Where Violation Exists. No application required pursuant to this section shall be accepted for processing or approved where any existing use in the district is being maintained or operated by the operator or its agents in violation of any material provision of this title.	No violations were issued in 2015.																														



#	CSD Section/ Plan	CSD Language	Compliance Description
143	I.1	<p>Civil Penalties and Performance Security. The operator shall be subject to a penalty for violation of any requirement of this section as determined by, and at the discretion of, the director in an amount not less than \$1,000 or more than \$1,000 per day per violation, but in no event, in an amount beyond that authorized by state law. For this purpose, the operator shall deposit the sum of \$100,000 in an interest-bearing trust fund with the department of regional planning within 30 days following the effective date of this section, to establish a draw-down account. A written notice of violation and the associated penalty will be sent to the operator in the event of a violation. If the noted violation is not corrected to the satisfaction of the director within the time period set forth in the notice of violation, the penalty amount cited in the notice of violation will be deducted from the account. If the violation is corrected within the time period set forth in the notice of violation, but recurs any time within a six-month period, the penalty will be deducted from the account upon each recurrence and the operator will be notified of such deduction. Once the deposit has been depleted by 50 percent of the initial amount (\$50,000), the operator shall deposit additional funds sufficient to bring the balance up to the amount of the initial deposit (\$100,000) within 10 business days of notification. There is no limit to the number of supplemental deposits that may be required while the operator conducts oil operations within the district. If the operator is dissatisfied with the action of the director, the operator may file an appeal with the hearing officer within 15 days after the date which notice is mailed. Upon receiving a notice of appeal, the hearing officer shall take one of the following actions:</p> <ul style="list-style-type: none"> <li>a. Affirm the action of the director;</li> <li>b. Refer the matter back to the director for further review with or without instructions; or</li> <li>c. Set the matter for public hearing and after hearing, affirm, modify, or reverse the action of the director.</li> </ul> <p>The decision of the hearing officer shall be final.</p>	<p>On 12/23/08, \$100,000 was deposited with the County in the interest-bearing trust fund required by this provision. FM O&amp;G was not subject to any fees described in this provision; hence, the balance of this account has not changed with the exception of interest accumulation.</p>
144	I.2	<p>Access to Records and Facilities. As to any condition which requires for its effective enforcement the inspection of records or facilities by the county or its agents, the operator shall make such records available or provide access to such facilities upon reasonable notice from the county. The county agrees to keep such information confidential where required or permitted by law and requested by the operator in writing.</p>	<p>FM O&amp;G has made records and facilities available for inspection by the County and its agents.</p>
145	I.3	<p>Right of Entry. Any officer or employee of the county of Los Angeles, or his or her duly appointed representative, whose duties require the inspection of the oil field premises shall have the right and privilege at all reasonable times, to enter upon any premises upon or from which any oil operations are being conducted for which any permit is required under this section, for the purpose of making any of the inspections pursuant to this section, or in any other ordinance of the county, or for any other lawful purpose, but for safety reasons, shall be accompanied by the operator or a designee of the operator and shall wear all appropriate personal protection equipment in accordance with the operator's established health and safety policies.</p>	<p>FM O&amp;G has made the oil field open to inspection.</p>

#	CSD Section/ Plan	CSD Language	Compliance Description
146	J.1	<p>Community Advisory Panel ("CAP"). A community advisory panel shall be established by the director to foster communication about ongoing operations at the oil field and to allow the community representatives to provide input to the county and the operator.</p> <p>a. CAP Members. The CAP may include representatives of the county, the city of Los Angeles, the city of Culver City, West Los Angeles College, the operator, the landowners, and each of the major neighborhoods surrounding the oil field (including Ladera Heights, Windsor Hills, Oak Park, View Park, Culver Crest, Blair Hills, and Faintree). The operator and each of the governmental entities previously referred to may each designate a representative to the CAP. Each landowner and neighborhood organization of the surrounding communities may submit a nomination to the director for appointment to the CAP. Where there is no neighborhood organization, a community resident may make a request to the director to be appointed to the CAP. School districts with schools in the vicinity of the oil field and the lessors may make a request to the director to have a representative appointed to the CAP.</p> <p>b. CAP Meetings. The CAP shall determine its meeting schedule.</p> <p>c. Documents Provided to the CAP. A notice of availability of all monitoring and compliance reports and results, all plans, audits and studies, and any other available documents that are required by this section shall be submitted to the CAP promptly after they are prepared or otherwise available. Copies of these reports, documents, and other items shall be provided to CAP members upon request except to the extent information therein may not be legally disclosed. Prior to each CAP meeting, the county shall provide to the CAP a list of all violations of the provisions of this section that have occurred since the last CAP meeting.</p>	Documentation made available to the CAP is posted on the Inglewood Oil Field website required/described in J.2.c.
147	J.2.a G.7 (2015)	<p>J.2.a: Community Meetings. The operator shall hold community meetings on an annual basis to provide updates on oil operations.</p> <p>G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "agendas for future Community Meetings be specific to oil field operations and issues and that measures be implemented to ensure questions from the public are addressed appropriately.</p>	The 2015 annual meeting was held on 11/10/2015, and in accordance with the G.7 (2015) recommendation, the agenda was specific to oil field operations and FM O&G ensured that questions from the public were addressed appropriately.
148	J.2.b	<p>Newsletter. The Operator shall publish an informational newsletter annually, which shall contain updated information on oil operations including drilling, redrilling, maintenance, repair, and reworking activities and all recently granted conditional use permits or applications filed for conditional use permits for the oil field. The newsletter shall be mailed by the operator to all owners of property located within 1,000 feet of the outer boundary line; all owners of property within 1,000 feet of the perimeter of the district as shown in the records of the county assessor's office; to any person or entity who has filed a written request therefore with the director; and to neighboring cities. The operator shall also make these newsletters available on the oil field web site. The oil field web site address shall be publicized in each newsletter.</p>	The seventh edition of the newsletter was mailed out and posted on 10/19/15.
149	J.2.c	<p>Oil Field Web Site. The operator shall maintain and update on a regular basis an oil field web site that shall include information on oil operations at the oil field, including drilling and production activities. All monitoring and compliance reports and results, plans, audits and studies, and any other available documents that are required by this section (except to the extent they contain information that may not legally be disclosed) shall be promptly posted on the Oil Field Web Site in pdf format.</p>	FM O&G maintains the www.inglewoodoilfield.com website, which includes information on the history and future of the oil field, oil field operations, operational plans, compliance plans, community and environmental sections, and information on the CSD. The web site contains over 100 documents related to operational and compliance information with the documentation posted in pdf format as required by this policy. The web site also provides contact information and includes an interactive email system to allow for direct input to FM O&G and for registering for email updates on oil field activities.

#	CSD Section/ Plan	CSD Language	Compliance Description
150	J.3	Ombudsperson. The operator shall designate employees or authorized agents to serve as ombudspersons to respond to questions and concerns concerning the oil operations. Each ombudsperson shall be familiar with all the provisions of this section and all conditions of approval related to permits and approvals issued by the county or the State of California. It shall be the further responsibility of the ombudsperson to facilitate, to the extent feasible, the prompt resolution of any issues that may arise relating to the above-stated matters or the impacts of the oil operations. The name, title, email address, and telephone number of the ombudsperson shall be posted on the oil field web site, prominently displayed in the newsletter, distributed twice per year to the CAP and MACC, and provided to any other persons requesting such information. An ombudsperson shall be available at all times, and shall respond within one hour after an initial call. An ombudsperson shall also meet at reasonable times with interested parties in an attempt to resolve issues related to oil operations. An ombudsperson shall have authority to initiate a response on behalf of the operator in all foreseeable matters. The operator shall be required to maintain a written log of all calls to the ombudspersons registering complaints or concerns regarding oil operations or other matters. The log shall include the complainant's name, date, time, phone number, nature of complaint, and the response or resolution offered. A copy of the log shall be provided to the director, the MACC, and the CAP on a quarterly basis.	The ombudsperson system has been in place since the adoption of the CSD and serves as primary contact between FM O&G and the community. The ombudsperson contact information is included in the annual newsletters and in the agendas for CAP meetings. In addition to the ombudsperson, the oil field maintains four staff members on an on-call basis to coordinate and respond to calls from the public or regulatory agencies regarding oil field operations. FM O&G maintains a complaint log summarizing all calls made to the ombudsperson as required by this policy.
151	Section K.	Modification of Development Standards.	No modifications to development standards has been applied for.
152	Section L.	Implementation Provisions. This subsection identifies the various implementation plans and other requirements for initial compliance with this CSD and the time frames therefor. Except as identified below, the provisions of this section shall be complied with on the effective date of the ordinance establishing this CSD. As used in this subsection, "effective date" shall mean 30 days after the board of supervisors adopts the ordinance establishing this CSD. As soon as possible after the effective date, the department of regional planning shall develop an overall implementation plan specifying the required contents or measures for each of the plans set forth below, including the inclusion of those appropriate mitigation measures indicated as necessary by the Final Environmental Impact Report for the Baldwin Hills Community Standards District to reduce environmental impacts to less than significant levels in cases where impacts can be so reduced.	This subsection of the CSD lists the various implementation plans and other stipulations required for initial compliance along with a submittal schedule for the subject compliance. The schedule requirements for the plan and compliance submittals required under this provision range from 30 days to two years following the effective date of the CSD (October 28, 2008). All plans and initial requirements of this CSD subsection were completed; therefore, this requirement is no longer applicable.
153	SA 5	Health Assessment and Environmental Justice Study. The County shall complete a Community Health Assessment of the communities surrounding the Oil Field which shall include an Environmental Justice component by June 2012 and ensure additional assessments are completed every five to seven years throughout the life of the CSD. In future Community Health Assessments, the County Department of Public Health ("Public Health") shall review other agencies' reports regarding air quality, water quality and seismic data, where feasible, in its assessment. Public Health will analyze the information by socio-economic and demographic data to accommodate and reflect an Environmental Justice component. The Community Health Assessment shall include, but not be limited to, an analysis of cancer rates, mortality rates, birth outcomes and a survey of other pertinent health indicators. The County will consult with the CAP and the Health Working Group regarding the Community Health Assessment and consider reasonable comments by the CAP and the Health Working Group. Public Health will comply with all applicable state and federal requirements including Title VI of the Civil Rights Act of 1964 and corresponding regulations, and California Government Code Section 11135 and corresponding regulations.	This is a County action that was completed in July 2012.
154	SA 7	Electrical Distribution Study. The County will propose to Southern California Edison ("SCE") and the Los Angeles Department of Water and Power ("DWP") that a study be conducted in cooperation with SCE, DWP, the County and PXP regarding opportunities to streamline and consolidate electrical lines distributed throughout the Oil Field and that SCE and DWP each fund one-fourth of the cost of such study. PXP will fund one fourth of the cost of any such study. The County will fund one-fourth of the cost of any such study.	This is a County action, and it was reported that both SCE and DWP declined to participate with respect to funding the study.

#	CSD Section/ Plan	CSD Language	Compliance Description
155	SA 8	Air Quality Monitoring. Supplemental to the air monitoring required by the CSD, the County will develop and implement an air quality monitoring plan that takes into consideration review and comments from Petitioners, interested stakeholders and the public. Such air monitoring shall be designed to assess the risk of both acute and chronic exposure to air contaminants from Oil Field operations, and endeavor to determine and distinguish the source of emissions, to the extent feasible, using available and affordable monitoring technology. Such air monitoring may be performed by SCAQMD, or an independent qualified consultant selected by County, and shall be commenced within 12 months of the date of this Agreement. The protocol for the air monitoring plan shall be peer reviewed prior to commencement. The plan shall be completed, and a peer reviewed report issued, within 12 to 24 months after commencement. The County commits to spending up to \$250,000 of its own funds toward implementing the plan and shall use reasonable efforts to seek additional funding sources, if necessary, to implement the plan. PXP shall reasonably cooperate with SCAQMD, the County and/or the independent consultant regarding any and all air monitoring related to the Oil Field.	This is a County action that was completed in February 2015.
156	SA 9	Back-Up Flare. The CSD (County Code section 22.44.142.L.5.b) allows PXP to maintain its existing gas plant flare as back-up equipment at the facility's gas plant after a new flare is permitted and installed. PXP and the County agree that this provision of the CSD allows only one gas plant flare to be operated at one time at the Oil Field. PXP shall comply with said limitation of only one gas plant flare operating at one time at the Oil Field. PXP shall install and have operational the new flare within 180 days of receiving the SCAQMD permit or at such later date as approved by the Director of Regional Planning for good cause shown.	Installation of the new gas plant back-up flare was completed in 2012. The old gas plant flare remains and is maintained as a back up equipment as allowed for by CSD Provision L.5.b and the Settlement Agreement. FM O&G has complied with the requirement that only one flare be in operation at one time at the oil field.
157	SA 10	Well Plugs. DOGGR requires oil field operators to utilize a minimum 25-foot cement surface plug at the top of a well when abandoning; any such well pursuant to Title 14 of the California Code of Regulations section 1723.5. To augment this requirement, for all wells abandoned at the Oil Field from the date of this Agreement, PXP shall utilize a total of 150-foot cement surface plug.	FM O&G complies with the 150 foot cement plug requirement for abandoned wells.
158	SA 13	Fracking Study. PXP shall pay for an independent consultant to conduct a study of the feasibility and potential impacts (including impacts to groundwater and subsidence) of the types of fracturing operations PXP may conduct in the Oil Field. The study will also consider PXP's historic and current use of gravel packing. Such study will be completed within twelve (12) months of the date of this Agreement. Such study and all the back-up information for such study shall be provided to a qualified peer reviewer selected by the County and PXP, who shall review the study, back-up materials, and conclusions for completeness and accuracy. PXP must provide the independent expert with all materials requested and reasonably necessary for an accurate and verifiable study. The peer reviewer will be provided with access to all the data and materials provided to the independent expert. The peer reviewer shall agree to keep all proprietary information confidential. If the peer reviewer determines that the study is materially inadequate, incomplete or inaccurate, it shall so advise PXP's consultant who will complete the study as reasonably recommended by the peer reviewer and provide the revised study to the peer reviewer within 90 days. Upon acceptance by the peer reviewer, the study and all supporting material, including comments by the peer reviewer, shall be forwarded to the County, DOGGR, the Regional Water Quality Control Board ("RWQCB"), CAP and Petitioners and be available to the public, with any proprietary information redacted.	The Hydraulic Fracturing Study—Inglewood Oil Field was completed in July 2012 with the final report dated October 10, 2012 consistent with the requirements of the Settlement Agreement. The report is available to the public on the Inglewood Oil Field web site.
159	SA 15	CSD Provisions. The CSD and all of its standards and requirements remain in full force and effect except to the extent that PXP has agreed to be limited by stricter or more rigorous controls or standards as reflected in this Agreement. Nothing herein shall limit or abrogate the County's discretion in amending the CSD, or other action pursuant to the County's legislative or police powers, to impose more restrictive requirements. This Agreement neither establishes nor abrogates any vested rights to drill new wells in the Oil Field. The County will provide written guidance on the additional limits and controls regarding operation of the Oil Field which are required by this Agreement to County staff and departments responsible for implementing the CSD and enforcing the CSD, and any other personnel the County deems necessary. The County shall recirculate this written guidance on an annual basis.	The requirements of the CSD and the Settlement Agreement remain in full effect. The County released the written guidance required by this provision via the Periodic Review report as described in CSD provision G.7 and a Settlement Agreement 2015 Compliance Report dated 11/30/15. A revision to this report was issued on 12/02/15.

SPR BALDWIN HILLS

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# 2016 EQAP AUDIT REPORT

**MRS Environmental**

**10/18/2017**

## 2016 EQAP AUDIT REPORT

### SUMMARY

This report provides an overview of the 2016 Environmental Quality Assurance Program (EQAP) audit conducted by MRS Environmental Inc. (MRS) during the spring and summer of 2017 at the Sentinel Peak Resources (SPR), formerly Freeport-McMoRan Oil & Gas (FM O&G), offices in Los Angeles, California. An initial review of SPR's, then FM O&G, compliance matrix for the calendar year 2016 was conducted by MRS in March 2017. A comprehensive file review, field verification and field inspections in support of the EQAP audit effort were conducted by MRS, the Environmental Compliance Coordinator (ECC), during Baldwin Hills Community Standards District (CSD) compliance site visits completed during the period March through August 2017.

This review covers the year 2016 and the associated 2016 EQAP report prepared by SPR. The previous EQAP audit, completed in 2013, covered the year 2012 and the 2012 EQAP report. Comprehensive review and documentation of the oil and gas operations at the Inglewood Oil Field for the years 2013, 2014 and 2015 were completed by the compliance documents *Baldwin Hills Community Standards District Periodic Review* (CSD requirement G.7) finalized in September 2015 and the Safety Inspection, Quality Assurance Program (*SIMQAP*) *Safety Audit* (CSD F.3) completed in July 2016.

The audit consisted of both a comprehensive file review of reports, plans, and various documentation logs, as well as a field review of operations and maintenance procedures. Additionally, MRS assessed the implementation status of the previous year's recommendations.

The overall findings of the audit identified two items that are out of compliance with the EQAP-related mitigation measures identified in the Baldwin Hills Community Standards District (CSD). The review also identified one finding to improve the implementation of a mitigation measure. It should be noted that during the year encompassed by this audit, there was no drilling going on at the oil field; therefore, assessment of compliance to items related to drilling was not applicable. Once drilling resumes, additional review will focus on compliance with drilling-related provisions of the CSD, along with typical oil field operations. In conducting the 2016 EQAP audit, the following recommendation was developed for potential improvements that would ensure continued compliance with the EQAP-related provisions of the CSD.

#### Findings/Recommendations

1. ***Meteorological Station Data Downloading Procedure***: The 2016 meteorological data set did not meet the EPA required 90 percent valid data recovery requirement due to a data processing error. Data for the month of December was not downloaded in a timely manner, and the data was overwritten by the station data logger with subsequent data. The loss of the December data combined with additional hours of data deemed invalid or an anomaly during the data validation review resulted in the data recovery for two parameters, delta temperature and solar radiation, to be less than 90 percent. Therefore, the overall data set for the year did not meet the EPA data recovery requirement and thusly the requirements for CSD requirement E.3.j. It is recommended that SPR develop and implement a data processing protocol for the downloading and storage of the meteorological data to prevent future data loss.

2. **Fairfax Avenue Gate Open During Business Hours:** The access gate off Fairfax Avenue is open during business hours from 6:00 am to 5:00 pm. The gate is the main access point to the SPR offices, warehouse, and equipment storage areas. This section of the oil field also contains several oil wells. CSD Condition E.22 requires "*All unmanned entrances to the oil field to be closed at all times except when vehicles are entering or leaving the oil field.*" SPR shall keep the Fairfax Avenue gate closed consistent with CSD Condition E.22 and provide for a security guard or intercom system for access through the gate for sub-contractors or visitors.
3. **Community Alert Notification CAN):** The CAN notification list should be updated on a regular basis to ensure all area residents and businesses are contacted in the event of an emergency. CodeRed®, the CAN vendor, uses several commercially available data bases to update the list periodically, but this system may not be comprehensive. SPR should coordinate with CodeRed® to develop a notification update protocol for the CAN notification list.

## BACKGROUND

SPR operates the Inglewood Oil Field in the Baldwin Hills Zoned District of Los Angeles County; SPR assumed full operation of the field from FM O&G on January 1, 2017. Existing operations of the oil field include the extraction of oil and gas from subsurface reservoirs, removal of water from the crude oil, removal of impurities and gas liquids from the gas, and shipping of crude oil through pipelines to refineries located in Southern California. Produced gas is sold to the Gas Company on-site and shipped by pipeline. Produced water is re-injected into the oil bearing reservoirs with a system of injection wells.

On October 28, 2008, the Los Angeles County Board of Supervisors adopted the Baldwin Hills CSD to provide a means of implementing regulations, safeguards, and controls for activities related to drilling for and production of oil and gas within the oil field located in the Baldwin Hills area of unincorporated Los Angeles County.

The EQAP entails the preparation of an EQAP Program by the operator indicating how the operator intends to comply with all conditions of approval and plans that are part of the CSD (prepared in February 2008, revised in August 2008, and approved on October 28, 2008); field-monitoring to enforce compliance with environmentally protective permit conditions; preparation of an annual EQAP Report by SPR; and, finally, a follow up EQAP audit to document compliance and noncompliance items and provide recommendations as deemed appropriate.

In March 2017, SPR submitted the 2016 Annual EQAP Report as required by the CSD.

During the week of March 13 to 17, 2017, the ECC conducted a file and document review of the 2016 Annual EQAP Report and associated compliance documentation. During CSD compliance site inspections between March and August 2017, the ECC, along with representatives from SPR, conducted a comprehensive file and field audit of the 2016 Annual EQAP Report at SPR offices and the Inglewood Oil Field.

EQAP requirements comply with State law, which mandates the adoption of a program for reporting or monitoring mitigation measures included as permit conditions for projects such as the CSD (Public Resources Code § 21081.6(a) and CEQA Guidelines §§ 15091(d) and 15097).

## CSD REQUIREMENT

The CSD Section 22.44.142.F.1 of the Los Angeles County Zoning Code requires SPR to develop and implement the following:

Environmental Quality Assurance Program (EQAP). The Operator shall comply with all provisions of an Environmental Quality Assurance Program (EQAP) that has been approved by the Director. The following provisions relate to the EQAP:

- a. EQAP Requirements. The EQAP shall provide a detailed description of the steps the Operator shall take to assure compliance with all provisions of the CSD, including but not limited to all of the monitoring programs called for by the CSD.
- b. Annual EQAP Reports. Within 60 days of the end of each calendar year, the Operator shall submit to the Director an annual EQAP report that reviews the Operator's compliance with the provisions of the EQAP over the previous year and addresses such other matters as may be requested by the Director. The Annual EQAP Report shall include the following:
  - *A complete list and description of any and all instances where the provisions of the EQAP, or any of the monitoring programs referred to therein or in the CSD, were not fully and timely complied with, and an analysis to how compliance with such provisions can be improved over the coming year.*
  - *Results and analyses of all data collection efforts conducted by the Operator over the previous year pursuant to the provisions of the CSD.*
- c. EQAP Updates. The EQAP shall be updated as necessary and submitted to the Director for approval along with the annual EQAP report. The EQAP updates shall be provided to the CAP and MACC for review and comment. Comments from the CAP and MACC, if timely received, shall be considered by the Director before making a decision to approve the same. The Director shall complete the review of EQAP updates as soon as practicable, and shall either approve the updated EQAP or provide the Operator with a list of specific items that must be included in the EQAP prior to approval. The Operator shall respond to any request for additional information within 30 days of receiving such request from the Director, unless extended by the Director.

## AUDIT PARTICIPANTS

Table 1 identifies the individuals who participated in the 2016 EQAP Audit.



**Table 1 – Audit Participants**

<b>NAME</b>	<b>POSITION</b>	<b>ORGANIZATION</b>
Daniel Taimuty	EH&S Manager	SPR
John Landgard	EH&S Specialist	SPR
Sylvia Peterson	EH&S Consultant	SPR
Luis Perez	Senior Project Manager	ECC
Greg Chittick	Senior Engineer	ECC
Dean Dusette	Senior Scientist	ECC

**Previous Audit RECOMMENDATIONS' STATUS**

As a result of the last EQAP Audit, MRS developed two recommendations for potential improvements that would ensure continued compliance with the EQAP-related provisions of the CSD. Table 2 provides the recommendation and status of those findings.

**Table 2 – 2012 Recommendations' Status**

<b>RECOMMENDATION</b>	<b>STATUS</b>
1. <b>Noise Making Equipment Service:</b> Update the equipment maintenance management program (Maximo®) to include the inspection and, if necessary, service of noise making equipment consistent with CSD provision 22.44.142.E.5.d. The maintenance management program data shall serve as the equipment service log required by the subject requirement.	<b>Implemented.</b>  The operator has reviewed the facility maintenance management system and determined that the existing equipment service program addresses potential noise problems. Noise issues associated with oil field equipment in the past several years were associated with equipment failure, a broken pump jack unit for example, and not maintenance issues. One noise complaint in 2016 was associated with well abandonment activities; the noise was due to the well/rig location adjacent to West LA College and not equipment requiring maintenance. The ECC will continue to investigate any noise issue identified with oil field equipment during field compliance inspections.
2. <b>Contractor/Sub-Contractor Training:</b> The Operator Training Records Report does not include a complete list of contractor/subcontractor training records. Compliance with the EQAP requires confirmation that all CSD training is being conducted. Include contractor/sub-contractor training records in the FM O&G Training Records Report or provide the records in a format that documents that the required training has been completed.	<b>Implemented.</b>  During both the SIMQAP audit completed in 2016 and the records review conducted for this EQAP audit, the operator provided well organized documentation on training for both operator staff and contractors/sub-contractors.

## SITE PHOTOS

Photos at the end of this report depict various components of the 2016 oil field operations. The photos were taken either during the EQAP audit field visit or during regular field visits throughout the year.

## SITE VISIT OBSERVATIONS

Some Observations during the year associated with the regular Site Visits are listed below:

1. FM O&G, the operator in 2016, did not drill any new wells in 2016. No new wells have been drilled at the oil field since June 2014. Annual drilling plans are submitted each year in October/November and reviewed by the County prior to the start of each calendar year.
2. Approximately 4 maintenance rigs were on the oil field at any given time in 2016. ECC visits to these well maintenance activities confirmed that site safety protocols were active with safety briefings by the onsite safety officer prior to accessing the well site. Well permits and JSA (Job Safety Analysis) documentation were provided by the safety officer upon request during the ECC inspections.
3. Inglewood Oilfield perimeter signs and drill site signs are installed in accordance with the approved Signage Plan. Signage documenting the change of operator from FM O&G to SPR were installed during the first quarter of 2017.
4. The 2016 meteorological data set did not meet the EPA required 90 percent valid data recovery requirement for several parameters (delta temperature and solar radiation) due to a data processing error. Data for the month of December was not downloaded in a timely manner and the data was overwritten by the station data logger with subsequent data. The loss of the December data combined with additional hours of data deemed invalid or an anomaly during the data validation review resulted in the data recovery for two parameters, delta temperature and solar radiation, to be less than 90 percent. Therefore, the overall data set for the year did not meet the EPA data recovery requirement. It is recommended that SPR develop and implement a data processing protocol for the downloading and storage of the meteorological data to prevent future data loss.

The data review in the 2016 Annual Audit and Data Validation Report includes a review of the collected data with the nearby SCAQMD site located at Los Angeles International Airport (LAX). Results of that review indicate the data compares favorably with the LAX data, consistent with previous years met data validation reviews. The instruments were replaced during a scheduled annual calibration/audit by the sensor vendor, Met One, in June 2016.

5. The bioremediation farms (Vickers, LAI South & LAI North) were not active in 2016, and soil remediation activities did not occur in 2016.
6. Review of the Oil Tank Pressure Monitoring Reports showed that there were no vent to atmosphere events or alarms requiring SCAQMD notification in 2016. Review of

SCAQMD breakdown reports for the period April 2009 through April 2016 indicated no outstanding compliance issues.

7. The access gate off Fairfax Avenue has been open during business hours from approximately 6:00 am to 5:00 pm. Although this section of the oil field is primarily used for access to the SPR offices, this area also contains a warehouse, fuel dock, and several oil wells. CSD Condition E.22 requires "*All unmanned entrances to the oil field to be closed at all times except when vehicles are entering or leaving the oil field.*" In addition, the CSD in Section C *Definitions*, identifies all areas of the CSD as an "*Oil Field*" except for the SCE Facility, the Holy Cross Cemetery, and a small parcel located east of La Brea Avenue. The CSD requires the Fairfax Avenue gate to be closed.
8. The accelerometer seismic station, originally installed on 5/20/09, was operational with collected data transmitted by cell link to the CalTech Seismological Laboratory. No events in 2016 exceeded the 13 percent of gravity criteria that would have required operations to cease.
9. Requirements of the Quiet Mode Drilling Plan (QMDP) were not implemented in 2016 due to the lack of new well drilling activities.
10. Two noise complaints were noted in 2016. One complaint on May 11, 2016, was determined to be associated with the rig completing well abandonment activities near West College Road and West LA College. The Department of Public Health (DPH) received three noise complaints from the same well abandonment project. The other noise complaint was registered at 11:15 pm on May 11, 2016, when the well abandonment rig was not in operation and no maintenance-related oil field activities were taking place; the cause was never determined. Noise monitoring by DPH in 2016 did not register an exceedance during any monitor events. Noise training for oil field staff and contractors occurred in 2016 as required by the CSD.
11. Annual spill response training in compliance with CSD E.1.b. was completed on November 3, 2016, and was observed by the ECC.
12. The Community Alert Notification system was tested on December 15, 2016. The ECC received notification of the test via telephone and email.

## FIELD AUDIT/COMPLIANCE STATUS

The SPR 2016 Annual EQAP Report was reviewed by MRS staff in March 2017. The results of that review are included in the table following the Conclusion section of this report. The table was generated to document review of the Annual EQAP Report and guide the file and field audit conducted at the SPR facilities during site inspections through the spring and summer months. Photographs from the site inspections conducted during the audit review period follow the EQAP audit table.

## RECOMMENDATIONS

1. ***Meteorological Station Data Downloading Procedure:*** The 2016 meteorological data set did not meet the EPA required 90 percent valid data recovery requirement for several parameters (delta temperature and solar radiation) due to a data processing error.

Therefore, the overall data set for the year did not meet the EPA data recovery requirement. It is recommended that SPR develop and implement a data processing protocol for the downloading and storage of the meteorological data to prevent future data loss.

2. **Fairfax Avenue Gate Open During Business Hours:** The access gate off Fairfax Avenue is open during business hours from 6:00 am to 5:00 pm. The gate is the main access point to the SPR offices, warehouse, and equipment storage areas. This section of the oil field also contains several oil wells. CSD Condition E.22 requires "*All unmanned entrances to the oil field to be closed at all times except when vehicles are entering or leaving the oil field.*" SPR shall keep the gate Fairfax Avenue gate closed consistent with CSD Condition E.22 and provide for a security guard or intercom system for access through the gate for sub-contractors or visitors.
3. **Community Alert Notification (CAN):** The CAN notification list should be updated on a regular schedule to ensure all area residents and businesses are contacted in the event of an emergency. CodeRed®, the CAN vendor, uses several commercially available data bases to update the list periodically but this system may not be comprehensive. SPR should coordinate with CodeRed® to develop a notification update protocol for the CAN notification list.

## CONCLUSION

The overall findings of the audit identified two items of compliance associated with the EQAP-related mitigation measures identified in the Baldwin Hills CSD. The review also identified one finding to improve the implementation of a mitigation measure. For the remaining audit items, the overall findings of the audit were positive and confirmed compliance with those EQAP-related mitigation measures identified in the Baldwin Hills Community Standards District (CSD).

EQAP Matrix #	CSD Ref.	Item	EQAP Audit Action	Audit Action Notes	Field Review? Y/N
1	E.1.a	CAN test	<ul style="list-style-type: none"> <li>• Verify annual test and results</li> </ul>	<ul style="list-style-type: none"> <li>• Test completed 12/15/16 via telephone and email. ECC received both telephone and email notification.</li> <li>• Discussion at the December 2016 CAP meeting noted that there should be a formal method to update the contact list.</li> <li>• CodeRed, the CAN vendor, uses 3 commercial methods such as credit card use and phone records to update the contact list.</li> <li>• SPR should have a method to confirm applicable residents are on the contact list; see audit finding.</li> </ul>	N
2	E.1.b	Spill response training	<ul style="list-style-type: none"> <li>• Confirm training</li> </ul>	<ul style="list-style-type: none"> <li>• Training completed 2/9/16.</li> <li>• ECC reviewed training records on 5/15/17.</li> <li>• ECC reviewed training Power Point on 5/15/17.</li> <li>• The 2016 emergency response drill was conducted on November 3, 2016; representatives from both LA County and Culver City Fire Departments, the County ECC and representatives from the California Department of Fish and Wildlife attended and participated in the drill.</li> <li>• The spill drill on 11/3/16 results were positive and approved by CA F&amp;W.</li> <li>• Checked spill trailer in the field; equipment trailer is well stocked with supplies.</li> <li>• FM O&amp;G completed spill drill on 2/3/16.</li> <li>• SPR completed boom deployment drill on 6/19/17.</li> </ul>	Y

EQAP Matrix #	CSD Ref.	Item	EQAP Audit Action	Audit Action Notes	Field Review? Y/N
3	E.1.c	ERP	<ul style="list-style-type: none"> <li>• Review</li> <li>• Confirm plan training</li> </ul>	<ul style="list-style-type: none"> <li>• ERP updated January 2017.</li> <li>• ECC reviewed ERP at facility on 5/15/17.</li> <li>• ECC reviewed training sign in sheet 9/21/17.</li> <li>• The 2016 emergency response drill was conducted on 11/3/16 and included representatives from both LA County and Culver City Fire Departments.</li> </ul>	Y
4	E.2.a	Emission offsets	<ul style="list-style-type: none"> <li>• Check for new emission sources that require offsets</li> </ul>	<ul style="list-style-type: none"> <li>• No new or modified emission sources.</li> <li>• Offsets not required.</li> </ul>	N
5	E.2.c	Odor minimization	<ul style="list-style-type: none"> <li>• Check plan</li> <li>• Review complaint logs</li> <li>• Verify complaints attributed to oil field</li> <li>• Confirm plan training</li> </ul>	<ul style="list-style-type: none"> <li>• No updates to plan required, current plan dated April 2010; plan reviewed by operator 11/21/16.</li> <li>• 14 odor complaints in 2016.</li> <li>• MRS investigated all complaints, including responsiveness to complaints.</li> <li>• Complaints are discussed at the CAP.</li> <li>• No odor complaints confirmed to be oil field related.</li> <li>• The Plan was reviewed by MRS in March 2017.</li> <li>• ECC reviewed employee training records during 12/16/16 site inspection. ECC reviewed employee and contractor training records on 5/15/17.</li> </ul>	Y
6	E.2.d	Air monitoring	<ul style="list-style-type: none"> <li>• Check plan</li> <li>• Review field inspection data</li> <li>• Confirm plan training</li> </ul>	<ul style="list-style-type: none"> <li>• Plan dated January 2010.</li> <li>• Plan was reviewed by MRS in March 2017.</li> <li>• No air monitoring done in 2016 due to no drilling activities.</li> <li>• ECC reviewed employee training records during 12/16/16 site inspection. ECC reviewed employee and contractor training records on 5/15/17.</li> </ul>	Y

EQAP Matrix #	CSD Ref.	Item	EQAP Audit Action	Audit Action Notes	Field Review? Y/N
7	E.2.d	Air monitoring trigger levels	<ul style="list-style-type: none"> <li>Check for any alarms</li> <li>Check for AQ issues</li> </ul>	<ul style="list-style-type: none"> <li>No alarms at gas plant in 2016.</li> <li>Gas plant alarm system verified during ECC inspections.</li> <li>No issues listed on SCAQMD web site.</li> <li>Sensors are calibrated quarterly, ECC reviewed documents on 9/21/17.</li> </ul>	N
8	E.2.d	AQ recordkeeping	<ul style="list-style-type: none"> <li>Review event records</li> </ul>	<ul style="list-style-type: none"> <li>No events recorded.</li> <li>SCAQMD Facility ID # 184301.</li> </ul>	N
9	E.2.e	Portable Flare/Drilling	<ul style="list-style-type: none"> <li>Review flare use events</li> </ul>	<ul style="list-style-type: none"> <li>No flare use or drilling in 2016.</li> </ul>	N
10	E.2.f	Tank Monitoring	<ul style="list-style-type: none"> <li>Review pressure/vent records</li> <li>Review breakdown records</li> </ul>	<ul style="list-style-type: none"> <li>No alarms requiring notification recorded.</li> <li>ECC reviewed SCAQMD breakdown reports for vent to atmosphere events for April 2009 to April 2017; no issues.</li> </ul>	Y
11	E.2.g	Bio Farms Odor	<ul style="list-style-type: none"> <li>Review odor suppressant use at Bio Farms</li> </ul>	<ul style="list-style-type: none"> <li>Bio Farms no longer in operation.</li> <li>No soil remediation activities in 2016.</li> </ul>	N
12	E.2.h	Drilling Odor	<ul style="list-style-type: none"> <li>Review odor suppressant use at drill sites</li> </ul>	<ul style="list-style-type: none"> <li>No drilling occurred in 2016.</li> </ul>	N
13	E.2.i	Closed systems	<ul style="list-style-type: none"> <li>Check for upset or releases</li> </ul>	<ul style="list-style-type: none"> <li>ECC reviewed SCAQMD breakdown reports for vent to atmosphere events for April 2009 to April 2017; no issues.</li> </ul>	Y

EQAP Matrix #	CSD Ref.	Item	EQAP Audit Action	Audit Action Notes	Field Review? Y/N
14	E.2.j	Met station	<ul style="list-style-type: none"> <li>Review station audit report</li> </ul>	<ul style="list-style-type: none"> <li>The 2016 meteorological data set did not meet the EPA required 90% valid data recovery requirement due to a data processing error. Data for the month of December was not downloaded in a timely manner and the data was overwritten by the station data logger with subsequent data. The loss of the December data combined with additional hours of data deemed invalid or an anomaly during the data validation review resulted in the data recovery for two parameters, delta temperature and solar radiation, to be less than 90%. Therefore, the overall data set for the year did not meet the EPA data recovery requirement.</li> <li>It is recommended that SPR develop and implement a data processing protocol for the downloading and storage of the meteorological data to prevent future data loss; see audit findings.</li> </ul>	Y
15	E.2.k	Updated Risk Assessment	<ul style="list-style-type: none"> <li>Review updated risk assessment requirement status</li> </ul>	<ul style="list-style-type: none"> <li>Met data for first 5 years has been reviewed and submitted to DRP Director and SCAQMD.</li> <li>MRS determined Met data not significantly different, no recommendation for updated health risk assessment. SCAQMD did not comment.</li> </ul>	N
16	E.2.j	Equipment specifications	<ul style="list-style-type: none"> <li>Review equipment CARB certifications</li> </ul>	<ul style="list-style-type: none"> <li>ECC reviewed CARB certifications for tiered engines and PERP registrations on 5/15/17.</li> </ul>	Y
17	E.2.m	Drill rig engines	<ul style="list-style-type: none"> <li>Review rig CARB certifications</li> </ul>	<ul style="list-style-type: none"> <li>ECC reviewed CARB certifications for tiered engines and PERP registrations on 5/15/17.</li> <li>No drilling occurred in 2016.</li> </ul>	Y



EQAP Matrix #	CSD Ref.	Item	EQAP Audit Action	Audit Action Notes	Field Review? Y/N
18	E.2.n	Drilling setbacks	<ul style="list-style-type: none"> <li>Review drilling plan for setback information</li> </ul>	<ul style="list-style-type: none"> <li>As noted in the drilling plan, no wells planned in setback areas and no wells drilled in 2016.</li> </ul>	N
19	E.2.o	Construction schedule	<ul style="list-style-type: none"> <li>Review major construction projects</li> </ul>	<ul style="list-style-type: none"> <li>No major construction projects in 2016.</li> </ul>	N
20	E.2.p	Dust control	<ul style="list-style-type: none"> <li>Review plan</li> <li>Review dust complaints</li> <li>Confirm plan training</li> </ul>	<ul style="list-style-type: none"> <li>Plan dated April 2010.</li> <li>Plan reviewed by MRS in March 2017.</li> <li>Plan review by operator November 2016</li> <li>One dust complaint in 2016, not verified due to lack of information in complaint.</li> <li>ECC reviewed employee training records during 12/16/16 site inspection. ECC reviewed employee and contractor training records on 5/15/17.</li> </ul>	Y
21	E.3.a	NGL blending	<ul style="list-style-type: none"> <li>Review data</li> </ul>	<ul style="list-style-type: none"> <li>NGLs are collected in the NGL bullet and then transferred to the LACT by pipeline and blended with the sales oil.</li> <li>ECC viewed the LACT meter and blending unit at the Packard Tank Farm on 9/21/17.</li> <li>No trucking of NGLs. All NGLs are blended into the pipeline.</li> </ul>	Y
22	E.3.b	Propane & NGL bullets	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>Condition completed February 2009.</li> </ul>	N
23	E.3.c	Steam drive plant	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>Not applicable, steam drive plant never constructed.</li> </ul>	N
24	E.3.d	Tank secondary containment	<ul style="list-style-type: none"> <li>Review for any changes</li> </ul>	<ul style="list-style-type: none"> <li>No changes to secondary containment.</li> <li>Secondary containment is inspected during ECC compliance inspections.</li> </ul>	N
25	E.3.d	Retention basins	<ul style="list-style-type: none"> <li>Review for changes</li> </ul>	<ul style="list-style-type: none"> <li>No changes to basin or basin capacity, annual weed and debris clearance to maintain volume.</li> <li>Capacity confirmed in 2009 Retention Basin Study.</li> </ul>	N

EQAP Matrix #	CSD Ref.	Item	EQAP Audit Action	Audit Action Notes	Field Review? Y/N
26	E.3.d	Pipeline secondary containment	<ul style="list-style-type: none"> <li>Review for changes</li> </ul>	<ul style="list-style-type: none"> <li>No changes to basins.</li> <li>Retention basin system prevents fluid from piping from getting off site.</li> </ul>	N
27	E.4.a	Grading	<ul style="list-style-type: none"> <li>Review for grading outside of grading plan</li> </ul>	<ul style="list-style-type: none"> <li>Plan approved 4/15/16.</li> </ul>	Y
28	E.4.	Grading > 5000 yds <sup>3</sup>	<ul style="list-style-type: none"> <li>Review project</li> </ul>	<ul style="list-style-type: none"> <li>No projects involved grading &gt;5000 yds<sup>3</sup>.</li> </ul>	N
29	E.4.b	Geotech investigation	<ul style="list-style-type: none"> <li>Review report</li> </ul>	<ul style="list-style-type: none"> <li>No structures installed in 2016 that required a Geotech investigation.</li> </ul>	N
30	E.4.c	Erosion Control	<ul style="list-style-type: none"> <li>Review plan</li> <li>Check for erosion issues</li> </ul>	<ul style="list-style-type: none"> <li>Plan approved May 2010.</li> <li>MRS reviewed plan in March 2017.</li> <li>Plan review by operator May 2016, no change.</li> <li>No erosion issues noted in field by ECC.</li> </ul>	N
31	E.4.d	Slope restoration	<ul style="list-style-type: none"> <li>Review projects</li> </ul>	<ul style="list-style-type: none"> <li>No applicable grading projects occurred in 2016.</li> </ul>	N
32	E.4.e	Ground movement	<ul style="list-style-type: none"> <li>Review reports</li> </ul>	<ul style="list-style-type: none"> <li>Reports reviewed by County DPW.</li> <li>Findings discussed at December 2016 CAP.</li> <li>Complaints have been investigated by third party Geotech consultant.</li> <li>No findings made to date on cause of movement measured in reports.</li> </ul>	N
33	E.4.f	Permanent structures Alquist-Priolo fault	<ul style="list-style-type: none"> <li>Check for new structures in fault zone</li> </ul>	<ul style="list-style-type: none"> <li>No structures installed in fault zone since CSD.</li> </ul>	N
34	E.4.g	Accelerometer	<ul style="list-style-type: none"> <li>Review accelerometer data</li> </ul>	<ul style="list-style-type: none"> <li>ECC reviewed 2005 through April 2017 data; 32 events with maximum acceleration 3.22 % versus 13% of gravity CSD condition standard.</li> </ul>	Y
35	E.4.h	Pipeline management	<ul style="list-style-type: none"> <li>Review plan</li> </ul>	<ul style="list-style-type: none"> <li>Pipeline management plan was reviewed for SIMQAP audit August 2016.</li> </ul>	N
36	E.4.i	Paleontological monitor	<ul style="list-style-type: none"> <li>Review project and monitoring results if applicable</li> </ul>	<ul style="list-style-type: none"> <li>No projects in 2016 required paleo monitoring.</li> </ul>	N

EQAP Matrix #	CSD Ref.	Item	EQAP Audit Action	Audit Action Notes	Field Review? Y/N
37	E.5.a	Noise limits	<ul style="list-style-type: none"> <li>• Review noise complaints</li> <li>• Check for DPH noise monitoring</li> <li>• Confirm plan training</li> </ul>	<ul style="list-style-type: none"> <li>• Two noise complaints in 2016.</li> <li>• One complaint associated with noise (#1216, 5/16/16), due to abandonment rig activities near College Road/West LA College.</li> <li>• DPH received three complaints associated with the same abandonment rig project above.</li> <li>• One noise complaint recorded at 11:15 pm; source never determined (#1116, 5/11/16).</li> <li>• ECC reviewed plan training records for years 2015 and 2016 on 5/15/17.</li> <li>• The ECC reviewed work orders for noisy equipment on 9/21/17. Noise issues from gear box and compressor belt were repaired.</li> <li>• Sound blankets have been installed on equipment adjacent to residential areas in some cases.</li> <li>• Confirmed noise training for maintenance rigs or year 2016 and 2017 to data on 9/21/17.</li> </ul>	Y
38	SA-2	Noise limits	<ul style="list-style-type: none"> <li>• See 37 above</li> </ul>	<ul style="list-style-type: none"> <li>• See Audit Matrix Item 37 above.</li> </ul>	N
39	E.5.b	Backup alarms	<ul style="list-style-type: none"> <li>• Review complaint log</li> </ul>	<ul style="list-style-type: none"> <li>• No complaints associated with back up alarms type noise.</li> </ul>	N
40	E.5.c	Quiet Mode Drilling	<ul style="list-style-type: none"> <li>• Review plan for updates</li> <li>• Check complaint log for noise</li> <li>• Confirm plan training</li> </ul>	<ul style="list-style-type: none"> <li>• ECC reviewed plan training records for years 2015 and 2016 on 5/15/17.</li> <li>• Two noise complaints, see Item 37 above.</li> <li>• No drilling in 2016.</li> </ul>	Y

EQAP Matrix #	CSD Ref.	Item	EQAP Audit Action	Audit Action Notes	Field Review? Y/N
41	E.5.d	Equipment servicing	<ul style="list-style-type: none"> <li>Review complaint log</li> </ul>	<ul style="list-style-type: none"> <li>No complaints confirmed with noise equipment except for abandonment rig as noted above.</li> <li>Confirm compliance with previous audit finding:  <i>Noise Making Equipment Service: Update the equipment maintenance management program (Maximo®) to include the inspection and, if necessary, service of noise making equipment consistent with CSD provision 22.44.142E5d. The maintenance management program data shall serve as the equipment service log required by the subject requirement.</i>                      The equipment management system can generate work orders for noise equipment (see #37 above).                      The program does not require updating for noisy equipment and repairs are logged into the system.</li> <li>ECC reviewed PSV testing records on 9/21/17. Records include ID, make, model, serial number, service date, and next service date.</li> </ul>	Y
42	E.5.e	Delivery to oil field schedule	<ul style="list-style-type: none"> <li>Review complaint log</li> <li>Confirm signage</li> </ul>	<ul style="list-style-type: none"> <li>No complaints associated with delivery vehicles.</li> <li>Signage confirmed by ECC.</li> </ul>	N
43	E.5.f	Delivery within oil field schedule	<ul style="list-style-type: none"> <li>Review complaint log</li> </ul>	<ul style="list-style-type: none"> <li>No complaints associated with delivery vehicles.</li> </ul>	N
44	E.5.g	Construction schedule	<ul style="list-style-type: none"> <li>Review complaint log</li> </ul>	<ul style="list-style-type: none"> <li>Construction schedule per requirements.</li> <li>No complaints associated with construction noise.</li> </ul>	N
45	E.5.h	Construction equipment	<ul style="list-style-type: none"> <li>Review complaint log</li> </ul>	<ul style="list-style-type: none"> <li>Complaint from abandonment rig, see Item 37.</li> </ul>	N

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46	E.5.i	Equipment idling	<ul style="list-style-type: none"> <li>Review complaint log</li> </ul>	<ul style="list-style-type: none"> <li>No complaints/issues.</li> <li>Excessive idling was not observed during any ECC inspections.</li> </ul>	N
47	E.5.j	Worker notification	<ul style="list-style-type: none"> <li>Confirm noise plan training</li> </ul>	<ul style="list-style-type: none"> <li>ECC reviewed plan training records for years 2015 and 2016 on 5/15/17.</li> </ul>	Y
48	E.6	Vibration	<ul style="list-style-type: none"> <li>Review complaint log</li> </ul>	<ul style="list-style-type: none"> <li>No issues/complaints from vibration in 2016.</li> </ul>	N
49	E.7.a	Oil spill response plan	<ul style="list-style-type: none"> <li>Review plan</li> <li>Confirm training</li> </ul>	<ul style="list-style-type: none"> <li>Training completed 2/9/16.</li> <li>ECC reviewed training records on 5/15/17.</li> <li>ECC reviewed training Power Point on 5/15/17.</li> <li>ECC attended table top spill drill on 11/3/16; drill results were positive and approved by CA F&amp;W.</li> </ul>	Y
50	E.7.b	Special species status report	<ul style="list-style-type: none"> <li>Review report</li> <li>Review pre-construction bird surveys</li> </ul>	<ul style="list-style-type: none"> <li>Report reviewed and review memo generated by ECC dated 3/1/17.</li> </ul>	N
51	E.7 c, h	Habitat restoration	<ul style="list-style-type: none"> <li>Review condition implementation status</li> </ul>	<ul style="list-style-type: none"> <li>Impacts to sensitive vegetation total 0.765 acres through 2016 therefore the 1.0-acre threshold for restoration has not been triggered.</li> </ul>	N
52	E.7 d,e,f,g	Construction surveys	<ul style="list-style-type: none"> <li>Review survey info in annual Special species status report</li> </ul>	<ul style="list-style-type: none"> <li>Report reviewed and review memo generated by ECC dated 3/1/17.</li> <li>No impacts or special species impacted.</li> </ul>	N
53	E.8.a	Cone House	<ul style="list-style-type: none"> <li>Review any issues/impacts</li> </ul>	<ul style="list-style-type: none"> <li>Cone Trust House is off limits to all oil field activities.</li> <li>ECC has documented no issues to Cone House during compliance inspections.</li> </ul>	N
54	E.8.b	Archeological training	<ul style="list-style-type: none"> <li>Confirm training</li> </ul>	<ul style="list-style-type: none"> <li>ECC reviewed employee training records during 12/16/16 site inspection. ECC reviewed employee and contractor training records on 5/15/17.</li> </ul>	Y

EQAP Matrix #	CSD Ref.	Item	EQAP Audit Action	Audit Action Notes	Field Review? Y/N
55	E.8.c	Construction impacts to culture resources	<ul style="list-style-type: none"> <li>Review for cultural resource finds</li> </ul>	<ul style="list-style-type: none"> <li>No cultural resources were uncovered in 2016.</li> </ul>	N
56	E.9	Lighting	<ul style="list-style-type: none"> <li>Review complaint log</li> <li>Review any new light sources</li> </ul>	<ul style="list-style-type: none"> <li>No complaints applicable to lighting.</li> <li>No new projects with significant new light sources noted.</li> </ul>	N
57	E.10 SA 11 G.7	Landscaping	<ul style="list-style-type: none"> <li>Review landscaping status and progress</li> </ul>	<ul style="list-style-type: none"> <li>April 2016 final approval of Phases 6 and 7, with all landscaping required to be completed by April 2019.</li> <li>Phases 1,2, 4, &amp; 5 completed.</li> <li>Phase 6 initiated.</li> <li>Phase 7 scheduled for after 6.</li> <li>Phase 3 scheduled for after 7.</li> </ul>	N
58	E.11 a, b	Oil field waste	<ul style="list-style-type: none"> <li>Review ECC inspections for issues</li> </ul>	<ul style="list-style-type: none"> <li>No issues noted in ECC inspections.</li> <li>Rig wastes are collected in bins and disposed.</li> <li>No drill rigs onsite in 2016</li> </ul>	N
59	E.11.c	Recycling plan	<ul style="list-style-type: none"> <li>Review ECC inspections for issues</li> <li>Review training documentation</li> </ul>	<ul style="list-style-type: none"> <li>No issues related to recycling noted.</li> <li>ECC reviewed training log.</li> <li>ECC reviewed receipts from recycle vendors.</li> </ul>	Y
60	E.12	Road construction	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>No new roads were constructed or are planned.</li> </ul>	N
61	E.13 a-e	Signs	<ul style="list-style-type: none"> <li>Review ECC inspections for issues</li> <li>Review signage</li> </ul>	<ul style="list-style-type: none"> <li>No sign issues noted in ECC inspections.</li> <li>Required signage is installed.</li> <li>SPR is in process of changing well signs to reflect their ownership.</li> </ul>	Y
62	E.14	Painting	<ul style="list-style-type: none"> <li>Review ECC inspections for painting issues</li> </ul>	<ul style="list-style-type: none"> <li>No painting issues noted in ECC inspections.</li> <li>New water tank painted.</li> <li>New flow line painted.</li> </ul>	Y
63	E.15 G.7	Sumps	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>The oil field does not contain any sumps.</li> </ul>	N

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64	E.16 a-d	Well cellars	<ul style="list-style-type: none"> <li>Review ECC well cellar inspections</li> </ul>	<ul style="list-style-type: none"> <li>ECC has noted where rain water was observed in well cellars.</li> <li>SPR has vacuum truck schedule to clear wells.</li> <li>No significant oil in cellars noted in 2016 ECC inspections.</li> <li>SPR provided the ECC with a well cellar pump log documenting rain water removal.</li> </ul>	N
65	E.17.a	SWPPP	<ul style="list-style-type: none"> <li>Review plan</li> <li>Review ECC inspections</li> </ul>	<ul style="list-style-type: none"> <li>Current version dated June 2013.</li> <li>SPR is working with RWQCB on storm water discharge treatment system.</li> <li>ECC inspections document system installed and operational during 2016 rain year.</li> </ul>	N
66	E.17.b	SPCCP	<ul style="list-style-type: none"> <li>Review plan</li> </ul>	<ul style="list-style-type: none"> <li>Plan updated and submitted July 2016.</li> <li>No significant spill issues in 2016.</li> <li>No offsite releases.</li> </ul>	N
67	E.17.c	Hydro analysis	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>Condition has not been triggered to date.</li> </ul>	N
68	E.18	Water management	<ul style="list-style-type: none"> <li>Review ECC inspections</li> </ul>	<ul style="list-style-type: none"> <li>ECC inspections have documented use of basin water for dust control.</li> <li>No issues noted for water use.</li> </ul>	N
69	E.19	Groundwater	<ul style="list-style-type: none"> <li>Review reports</li> </ul>	<ul style="list-style-type: none"> <li>ECC has reviewed reports.</li> <li>Monitoring results have been discussed at CAP meetings.</li> <li>All testing results are within drinking water standards with exception of arsenic = natural occurring.</li> </ul>	N
70	E.20 G.7	Fencing	<ul style="list-style-type: none"> <li>Review ECC inspections</li> </ul>	<ul style="list-style-type: none"> <li>No fencing issues noted in ECC inspections.</li> </ul>	Y

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71	E.21.a SA 12	Equipment removal	<ul style="list-style-type: none"> <li>Review status</li> <li>Review ECC inspections</li> </ul>	<ul style="list-style-type: none"> <li>No equipment issues noted during ECC inspections.</li> <li>Old equipment/junk is deposited in one area for collection and subsequent removal.</li> <li>Removal plan dated March 2014.</li> </ul>	Y
72	E.21.b	Equipment maintenance	<ul style="list-style-type: none"> <li>Review ECC inspections</li> <li>Review equipment maintenance management program (Maximo®)</li> </ul>	<ul style="list-style-type: none"> <li>No equipment issues noted during ECC inspections.</li> <li>ECC reviewed, see #37 and #41 above.</li> </ul>	Y
73	E.21.c	Debris removal	<ul style="list-style-type: none"> <li>Review ECC inspections</li> </ul>	<ul style="list-style-type: none"> <li>No debris issues noted during ECC inspections.</li> <li>Area where old equipment and junk is located not visible to the public.</li> </ul>	Y
74	E.22	Security	<ul style="list-style-type: none"> <li>Review ECC inspections</li> <li>CSD Condition: <i>“Oil Field” or “Oil Field Portion of the District” shall mean the entire District except for the Southern California Edison facility, the Holy Cross Cemetery, and the small non-contiguous parcel located east of La Brea Avenue, all of which excluded areas are shaded on the map at the end of this section.</i></li> </ul>	<ul style="list-style-type: none"> <li>ECC has documented that the main gate to the SPR offices on Fairfax is no longer manned by a guard and is open during business hours.</li> <li>No camera or dedicated watch exists at the Fairfax entrance.</li> <li>Access to the main oil field areas from the Fairfax entrance requires entering through locked gates behind the warehouse and office areas.</li> <li>The area accessible through the Fairfax gate does include several wells.</li> <li>The CSD condition exceptions do not apply to the section accessible through the Fairfax gate; see audit finding.</li> </ul>	Y
75	E.23	Vehicle parking	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>The oil field has ample parking.</li> </ul>	N
76	E.24.a	Sanitation	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>Garbage is collected weekly by third party.</li> <li>No significant rubbish has been noted during ECC inspections.</li> </ul>	N
77	E.24.b	Bathrooms	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>The oil field has sufficient sanitation facilities located at the office, gas plant, halfway house,</li> </ul>	N



EQAP Matrix #	CSD Ref.	Item	EQAP Audit Action	Audit Action Notes	Field Review? Y/N
				and at two modular contractor trailers.	
78	E.25	Hazardous materials storage	<ul style="list-style-type: none"> <li>Review ECC inspections</li> <li>Review business plan</li> </ul>	<ul style="list-style-type: none"> <li>Hazardous material storage area reviewed during ECC inspections.</li> <li>Secondary containment has been pumped dry after rain events.</li> <li>ECC reviewed Business Plan on 5/15/17. Plan CERS submittal date 2/23/17.</li> </ul>	Y
79	E.26.a	DOGGR regulations	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>No drilling in 2016.</li> </ul>	N
80	E.26.b	Number of rigs	<ul style="list-style-type: none"> <li>Review ECC inspections</li> <li>Review CAP minutes operator reports</li> </ul>	<ul style="list-style-type: none"> <li>No drill rigs on the field in 2016.</li> <li>ECC has documented no more than 4 maintenance rigs on the field in 2016.</li> <li>FM O&amp;G reported no more than 4 maintenance rigs on field in 2016.</li> </ul>	N
81	E.26.c SA1	Drilling plan	<ul style="list-style-type: none"> <li>Confirm 2017 plan approval</li> </ul>	<ul style="list-style-type: none"> <li>Drilling plan is reviewed each year by MRS and County.</li> <li>No drilling in 2016.</li> <li>Drilling plan approved 2/6/17.</li> </ul>	Y
82	E.26.c SA1	Supplemental review of wells	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>Drilling plan is reviewed each year by MRS and County.</li> <li>No supplemental review was required for 2016 or 2017 drilling plan.</li> </ul>	N
83	E.26.d	Drill rig engines	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>No drilling in 2016.</li> </ul>	N
84	E.26.e	Drill rig fire regulations	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>No drilling in 2016.</li> </ul>	N
85	E.26.f SA6	New technology for drill rigs	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>New technology for drill rigs is discussed in the annual drilling plans.</li> <li>Drilling plan is reviewed each year by MRS and County.</li> </ul>	N
86	E.26.g	Drill rig derricks and masts	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>No drilling in 2016.</li> </ul>	N
87	E.26.h	Rig removal	<ul style="list-style-type: none"> <li>Review ECC inspections</li> </ul>	<ul style="list-style-type: none"> <li>ECC inspections did not note any issues with maintenance rigs left for more than 90 days in any location.</li> </ul>	N

EQAP Matrix #	CSD Ref.	Item	EQAP Audit Action	Audit Action Notes	Field Review? Y/N
				<ul style="list-style-type: none"> <li>No drilling in 2016.</li> </ul>	
88	E.26.i	Drill site conditions	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>No drilling in 2016.</li> </ul>	N
89	E.26.i	Rig belt guards	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>No drilling in 2016.</li> </ul>	N
90	E.26 c.x	Drill plan topo profiles	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>Profiles no longer submitted per Periodic Review recommendation.</li> </ul>	N
91	E.27.a	Limits on processing	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>No changes in processing operations have been documented at the oil field.</li> </ul>	N
92	E.27.b	Refining	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>No refining is conducted at the oil field.</li> </ul>	N
93	E.27.c	Pump motors	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>All well pumps are electric.</li> </ul>	N
94	E.27.d	Well pumps	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>Submersible and down hole pumps are used where feasible.</li> </ul>	N
95	E.27.e	Pipeline transportation only	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>All oil transportation by pipeline.</li> </ul>	N
96	E.27.f	Pipeline requirements	<ul style="list-style-type: none"> <li>Review any new pipelines</li> </ul>	<ul style="list-style-type: none"> <li>New 10"-line BC Tank Setting to Packard Tank Farm, line does not transport off oil field</li> <li>ECC documented installation and painting of line.</li> </ul>	N
97	E.27.g	Pipeline plot plan	<ul style="list-style-type: none"> <li>Review any new pipelines</li> </ul>	<ul style="list-style-type: none"> <li>ECC confirmed with SPR on 9/21/17 that new pool line is on P&amp;IDs.</li> </ul>	Y
98	E.27.h	Machinery enclosures	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>No issues with machinery enclosures documented during 2016.</li> </ul>	N
99	E.27.i	Well openings	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>No issues with open wells documented during 2016.</li> </ul>	N
100	E.28.a	DOGGR regulations	<ul style="list-style-type: none"> <li>Review NOI and other DOGGR documents</li> </ul>	<ul style="list-style-type: none"> <li>ECC reviewed NOI and other DOGGR documents on 5/15/17.</li> </ul>	Y
101	E.28.b G7	Number of rigs	<ul style="list-style-type: none"> <li>Review ECC inspections</li> </ul>	<ul style="list-style-type: none"> <li>ECC inspections did not document more than 4 rigs at any time on the oil field.</li> <li>CAP operator reports noted 2 to 4 rigs on the field at any one time.</li> <li>No drill rig on the field in 2016.</li> </ul>	N

EQAP Matrix #	CSD Ref.	Item	EQAP Audit Action	Audit Action Notes	Field Review? Y/N
102	E.28.c	Rig operating schedule	<ul style="list-style-type: none"> <li>Review ECC inspections</li> <li>Review complaint log</li> </ul>	<ul style="list-style-type: none"> <li>ECC inspections did not note any issues with rigs operating outside schedule requirement</li> <li>No complaints associated with rigs operating outside schedule requirement.</li> </ul>	N
103	E.28.d	Rig specifications	<ul style="list-style-type: none"> <li>Review rig data</li> </ul>	<ul style="list-style-type: none"> <li>ECC reviewed rig CARB certifications on 5/15/17.</li> </ul>	Y
104	E.28.e	Rig removal	<ul style="list-style-type: none"> <li>Review ECC inspections</li> </ul>	<ul style="list-style-type: none"> <li>No instances of rigs staying on well sites after completion of work were noted by the ECC.</li> </ul>	N
105	E.29.a	New tanks specifications	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>No new tanks were constructed in 2016.</li> </ul>	N
106	E.29.b	Setbacks	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>No new tanks or buildings constructed in 2016.</li> </ul>	N
107	E.29.c	Vapor recovery	<ul style="list-style-type: none"> <li>Review any release to atm events</li> </ul>	<ul style="list-style-type: none"> <li>ECC reviewed SCAQMD breakdown reports for vent to atmosphere events for April 2009 to April 2016; no issues.</li> </ul>	Y
108	E.29.d	New piping specs	<ul style="list-style-type: none"> <li>Review new equipment installation records</li> </ul>	<ul style="list-style-type: none"> <li>ECC reviewed new 10"-line BC Tank Setting to Packard Tank Farm plans.</li> </ul>	Y
109	E.29.e	Tank bottom leaks	<ul style="list-style-type: none"> <li>Review ECC inspections</li> </ul>	<ul style="list-style-type: none"> <li>No tank bottom leaks were noted by the ECC</li> <li>No staining of soil or gravel noted.</li> <li>ECC inspected T-VIC Tank Battery, Gas Plant, Lower Vickers Tank Battery in 2016.</li> </ul>	N
110	E.30	Well production reporting	<ul style="list-style-type: none"> <li>Confirm submittal of reports to DRP and Fire Chief</li> </ul>	<ul style="list-style-type: none"> <li>ECC reviewed Well Production DOGGR submittals on 5/15/17. DRP receives the reports annually.</li> </ul>	Y
111	E.31	Idle well testing	<ul style="list-style-type: none"> <li>Review testing documentation</li> </ul>	<ul style="list-style-type: none"> <li>Reviewed by ECC on 9/21/17.</li> </ul>	Y
112	E.32	Abandoned well testing	<ul style="list-style-type: none"> <li>Review annual report</li> </ul>	<ul style="list-style-type: none"> <li>Reviewed 2016 annual report, no test results were above 50 ppmv background level trigger</li> <li>2017 testing completed in July.</li> </ul>	Y
113	E.33	Well/pad abandonment	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>No abandonment activities in 2016.</li> </ul>	N
114	E.34	County request for well status	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>The County has not made a request pursuant to this requirement.</li> </ul>	N

EQAP Matrix #	CSD Ref.	Item	EQAP Audit Action	Audit Action Notes	Field Review? Y/N
115	E.35	Reduced throughput trigger	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>Oil field throughput is not near the 630 bbls/day trigger.</li> </ul>	N
116	E.36	Abandonment	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>Not applicable to date.</li> </ul>	N
117	F.1 a, b	EQAP	<ul style="list-style-type: none"> <li>Complete 2016 EQAP review</li> </ul>	<ul style="list-style-type: none"> <li>Review completed for this audit action.</li> </ul>	Y
118	F.1.c	EQAP updates	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>No updates to the EQAP document have been noted as necessary by the ECC or in the Periodic Review.</li> </ul>	N
119	F.2	ECC	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>The EQAP and ECC inspections are ongoing and continuing programs.</li> <li>FM O&amp;G and SPR have funded the ECC with no issues on payment.</li> </ul>	N
120	F.3.a	SIMQAP	<ul style="list-style-type: none"> <li>Review records</li> </ul>	<ul style="list-style-type: none"> <li>Document review and SIMQAP audit was completed in July 2016.</li> <li>SIMQAP recommendation for better organization and tracking of SIMQAP required documentation ongoing.</li> </ul>	N
121	F.3.b	SIMQAP update	<ul style="list-style-type: none"> <li>Review document</li> </ul>	<ul style="list-style-type: none"> <li>SIMQAP document updated during audit process.</li> </ul>	N
122	F.3.c	SIMQAP worker notification	<ul style="list-style-type: none"> <li>Review training records</li> </ul>	<ul style="list-style-type: none"> <li>ECC reviewed training log during 12/16/16 site inspection.</li> <li>SPR provided organized hard copy files of all EQAP items for review at their offices.</li> </ul>	Y
123	F.3.d	SIMQAP inspections	<ul style="list-style-type: none"> <li>Review records, ECC inspections</li> </ul>	<ul style="list-style-type: none"> <li>SIMQAP records reviewed during 2016 audit.</li> <li>Recordkeeping system has been improved per previous EQAP audit recommendation.</li> </ul>	Y
124	F.4	Annual ERP drills	<ul style="list-style-type: none"> <li>Review annual drill results</li> </ul>	<ul style="list-style-type: none"> <li>Table top spill drill conducted 11/3/16.</li> <li>ECC attended table top spill drill.</li> <li>County and Culver City Fire attended drill.</li> <li>Drill results were positive and approved by CA F&amp;W.</li> </ul>	N

EQAP Matrix #	CSD Ref.	Item	EQAP Audit Action	Audit Action Notes	Field Review? Y/N
125	F.5	Noise monitoring	<ul style="list-style-type: none"> <li>Review any monitoring results</li> </ul>	<ul style="list-style-type: none"> <li>During 2016 DPH received three complaints which their field operations responded to. There were no exceedance events during the DPH monitoring hours.</li> </ul>	N
126	F.6	Vibration monitoring	<ul style="list-style-type: none"> <li>Review any monitoring results</li> </ul>	<ul style="list-style-type: none"> <li>No vibration complaints received by operator or DPH in 2016.</li> <li>DPH did not perform any vibration monitoring in 2016.</li> </ul>	N
127	F.7	Complaints	<ul style="list-style-type: none"> <li>Review complaint logs</li> </ul>	<ul style="list-style-type: none"> <li>16 total complaints (13 odor, 2 noise, 1 landscaping)</li> <li>No odor complaints confirmed to be oil field related</li> <li>Landscaping complainant (#0916, 4/25/16) stated landscaping is unacceptable. Landscaping is consistent with approved plan.</li> <li>One complaint associated with noise on 5/11/16 (#1216), due to abandonment rig activities near College Road/West LA College.</li> <li>DPH received three complaints associated with the same abandonment rig project above</li> <li>1 noise complaint recorded at 11:15 pm on 5/11/16, source never determined.</li> </ul>	N

SCAQMD Report Odor Signage



Rig Safety Signage

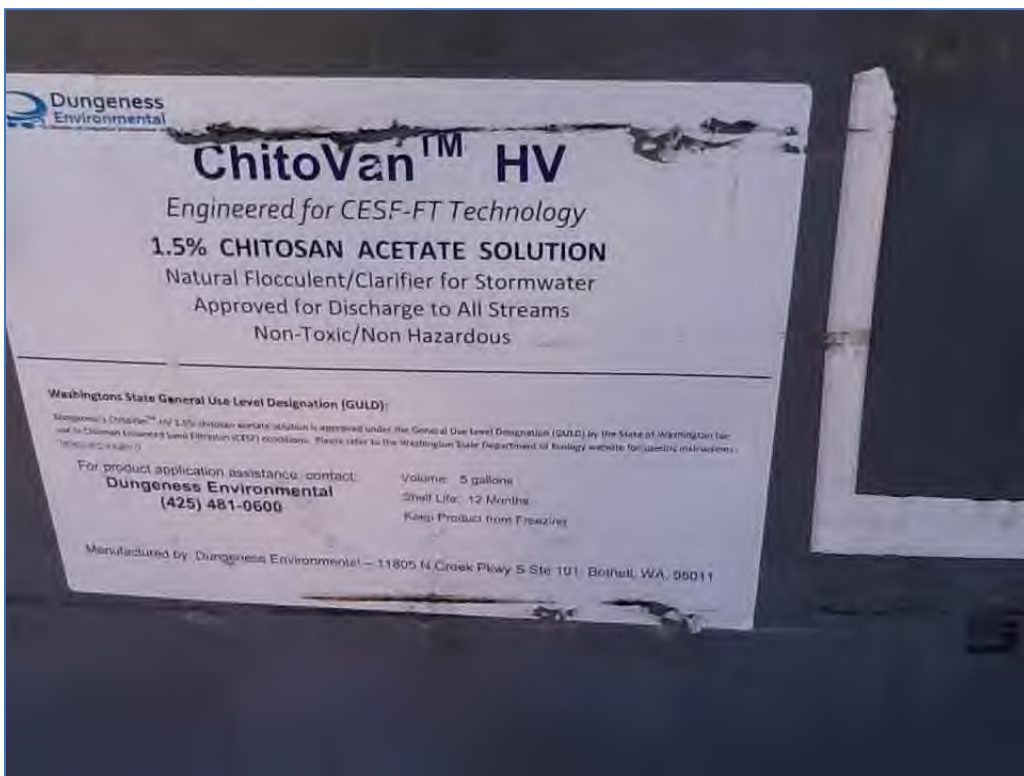




Storm-Water Treatment System



Storm-Water Treatment System – Flocculent/Clarifier



Storm-Water Treatment System – Filters



Storm-Water Treatment System – Tank Baffles





Well and Pump Jack



Injection Well



Packard Tank Farm



Packard Tank Farm Vessels





Phase 6 Landscaping – Fairfax Avenue



Phase 6 Landscaping – Fairfax Avenue



**Inglewood Oil Field  
2016 Environmental Quality Assurance Program (EQAP) Report**

#	CSD Section/ Plan	CSD Language	Compliance Description
1	E.1.a G.7 (2015)	E.1.a: Community Alert Notification System ("CAN"). The operator shall maintain and test on an annual basis a CAN for automatic notification of area residences and businesses in the event of an emergency arising at the oil field that could require residents or inhabitants to take shelter, evacuate, or take other protective actions. G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "the E.1.a annual Community Alert Notification (CAN) tests include interested residents."	The CAN is maintained and was tested on 12/15/2016. Interested residents were included in this test pursuant to the G.7/Final 2015 Periodic Review Final Report recommendation on this provision.
2	E.1.b	Spill Containment Response Training. The operator shall conduct annual spill containment response training and shall at all times have available, on-site, sufficient and properly maintained equipment and/or facilities so that a spill of the entire contents from the largest oil tank on the oil field can be responded to and contained in a timely manner to reduce the likelihood that the spill reaches a catch basin.	The annual spill containment response training occurred on 02/09/16.
3	E.1.c	Emergency Response Plan ("ERP"). The operator shall at all times maintain and fully implement and comply with all provisions of an emergency response plan and shall further ensure that the then current ERP satisfies all rules and regulations of the United States Environmental Protection agency and California Code of Regulations relating to emergency action plans and spill prevention control and countermeasure plans, as well as the rules, regulations, and requirements of the California Office of Spill Prevention and Response. The ERP shall also satisfy the rules and regulations of the United States Department of Transportation relating to onshore pipeline spills.	Freeport-McMoRan Oil & Gas (FM O&G) maintained, implemented and complied with an ERP in compliance with all applicable rules and regulations of agencies with oversight of the ERP. SPR will continue to do so.
4	E.2.a	Emission Offsets. The operator shall obtain emission offsets or RECLAIM credits as defined and required by SCAQMD Regulations for all new or modified emission sources that require a new or modified SCAQMD permit.	No credits were needed in 2016.
5	E.2.c	Odor Minimization. At all times the operator shall comply with the provisions of an odor minimization plan that has been approved by the director. The odor minimization plan shall include any measures requested by the director. The plan shall provide detailed information about the facility and shall address all issues relating to odors from oil operations. Matters addressed within the plan shall include setbacks, signs with contact information, logs of odor complaints, method of controlling odors such as flaring and odor suppressants, and the protocol for handling odor complaints. The odor minimization plan shall be reviewed by the operator on an annual basis to determine if modifications to the plan are required. Any modifications to the odor minimization plan shall be submitted to the director for review and approval.	The Odor Minimization Plan was reviewed by FM O&G on 11/21/16 and it was determined that no modifications are required.
6	E.2.d.	Air Monitoring Plan. At all times the operator shall comply with the provisions of an air monitoring plan that has been approved by the director. The air monitoring plan shall include any measure requested by the director. During drilling, redrilling, and reworking operations, the operator shall monitor for hydrogen sulfide and total hydrocarbon vapors as specified in the approved plan. Total hydrocarbon vapors shall be monitored at the gas plant as specified in the approved plan. Such monitors shall provide automatic alarms that are triggered by the detection of hydrogen sulfide or total hydrocarbon vapors. For drilling, redrilling, or reworking monitors, the alarms shall be audible and/or visible to the person operating the drilling, redrilling, or reworking equipment. For the gas plant monitors, the alarms shall be audible or visible to the gas plant operator. Actions to be taken shall be as follows when specified alarm levels are reached:	FM O&G complied with the provisions of the approved Air Monitoring Plan. Compliance was monitored by County Environmental Compliance Coordinator (ECC) site visits.

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#	CSD Section/ Plan	CSD Language	Compliance Description
7	E.2.d.i - iv	<p>i. At a hydrogen sulfide concentration of equal to or greater than five parts per million but less than 10 parts per million, the operator shall immediately investigate the source of the hydrogen sulfide emissions and take prompt corrective action to eliminate the source. The corrective action taken shall be documented in the drilling, redrilling, or reworking log. If the concentration is not reduced to less than five parts per million within four hours of the first occurrence of such concentration, the operator shall shut down the drilling, redrilling, or reworking operations in a safe and controlled manner, until the source of the hydrogen sulfide emissions has been eliminated, unless shutdown creates a health and safety hazard.</p> <p>ii. At a hydrogen sulfide concentration equal to or greater than 10 parts per million, the operator shall promptly shut down the drilling, redrilling, or reworking operations in a safe and controlled manner until the source of the hydrogen sulfide emissions has been eliminated, unless shutdown creates a health and safety hazard. The corrective action taken shall be documented in the drilling, redrilling, or reworking log. When an alarm is received, the operator shall promptly notify the county fire department- Health Hazardous Materials Division, the Culver City Fire Department, the Office of Emergency Services, and the SCAQMD.</p> <p>iii. At a total hydrocarbon concentration equal to or greater than 500 parts per million but less than 1,000 parts per million, the operator shall immediately investigate the source of the hydrocarbon emissions and take prompt corrective action to eliminate the source. The corrective action taken shall be documented in the drilling log for drilling, redrilling, or reworking and in the gas plant log for the gas plant. If the concentration is not reduced to less than 500 parts per million within four hours of the first occurrence of such concentration, the operator shall shut down the drilling, redrilling, reworking, or gas plant operations in a safe and controlled manner, until the source of the hydrocarbon emissions has been eliminated, unless shutdown creates a health and safety hazard.</p> <p>v. At a total hydrocarbon concentration equal to or greater than 1,000 parts per million, the operator shall promptly shut down the drilling, redrilling, or reworking or gas plant operations in a safe and controlled manner, until the source of the hydrocarbon emissions has been eliminated, unless shutdown creates a health and safety hazard. The corrective action taken shall be documented in the drilling log for drilling, redrilling, or reworking and in the gas plant log for the gas plant. When an alarm is received, the operator shall promptly notify the county fire department- Health Hazardous Materials Division, the Culver City Fire Department, and the SCAQMD.</p>	<p>In 2016, no notifications to The County or City of Culver City Fire Departments or AQMD were required.</p>
8	E.2.d.v	<p>All the monitoring equipment shall keep a record of the levels of total hydrocarbons and hydrogen sulfide detected at each of the monitors, which shall be retained for at least five years. The operator shall, on a quarterly basis, provide a summary of all monitoring events where the hydrogen sulfide concentration was at five parts per million or higher and the total hydrocarbon concentration was at 500 parts per million or higher to the fire chief. At the request of the fire chief, the operator shall make available the retained records from the monitoring equipment.</p>	<p>In 2016, FM O&amp;G provided the Fire Chief with quarterly reports, all of which reported zero (0) events during the respective quarter, on 4/5/16, 7/5/16, 10/3/16 and 02/22/17.</p>

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2016 Environmental Quality Assurance Program (EQAP) Report**

#	CSD Section/ Plan	CSD Language	Compliance Description
9	E.2.e	<p>Portable Flare for Drilling. The operator shall have a gas buster and a portable flare, approved by the SCAQMD, at the oil field and available for immediate use to remove any gas encountered during drilling operations from drilling muds prior to the muds being sent to the shaker table, and to direct such gas to the portable flare for combustion. The portable flare shall record the volume of gas that is burned in the flare. The volume of gas burned in the flare shall be documented in the drilling log. The operator shall notify the fire chief and the SCAQMD within 48 hours in the event a measurable amount of gas is burned by the flare, and shall specify the volume of gas that was burned in the flare. No drilling or re-drilling shall be conducted in areas that are known to penetrate the Nodular Shale zone unless a fully operational and properly maintained gas buster and portable flare are installed on the rig. All other drilling and re-drilling operations shall be conducted so that any measurable gas that is encountered can, and will, be retained in the wellbore until the gas buster and portable flare are installed on the rig, after which the gas will be run through the system. The operator shall immediately notify the fire chief and the SCAQMD in the event any gas from drilling or re-drilling operations is released into the atmosphere without being directed to and burned in the flare.</p>	<p>No notifications to the Fire Chief or AQMD were required In 2016.</p>
10	E.2.f	<p>Oil Tank Pressure Monitoring and Venting. All oil tanks that contain or could contain oil shall have a fully operational pressure monitoring system that continuously measures and digitally records the pressure in the vapor space of each tank. The detection system shall notify the operator via an alarm when the pressure in the tank gets within 10 percent of the tank relief pressure. In the event of an alarm, the operator shall immediately take corrective action to reduce the tank pressure. The corrective action shall be documented in the operator's log. The operator shall notify the fire chief and the SCAQMD within 24 hours if the pressure in any tank covered by this subsection ever exceeds such tank's relief pressure. Within seven calendar days after any tank vapor release, the operator shall report the incident to the SCAQMD as a breakdown event pursuant to Rule 430, and shall provide the fire chief with a written report of the event and the corrective measures undertaken and to be undertaken to avoid future oil tank vapor releases. The operator shall make any changes to such report that may be required to obtain approval from the fire chief and the SCAQMD, and shall promptly institute all corrective measures called for by the report.</p>	<p>No alarms requiring notification occurred In 2016; hence no notifications to the Fire Chief or the SCAQMD were necessary.</p>
11	E.2.g	<p>Odor Suppressant for Bioremediation Farms. When loading material or tilling material at the bioremediation farms, the operator shall use an odor suppressant such that no odor from the bioremediation farms can be detected at the outer boundary line.</p>	<p>The biofarms were not operated in 2016.</p>
12	E.2.h	<p>Odor Suppressant for Drilling and Re-drilling Operations. The operator shall use an odor suppressant spray system on the mud shaker tables for all drilling and re-drilling operations to ensure that no odors from said operations can be detected at the outer boundary line.</p>	<p>No drilling or re-drilling activities occurred in 2016.</p>
13	E.2.i	<p>Closed Systems. The operator shall ensure all produced water and oil associated with production, processing, and storage, except those used for sampling only, are contained within closed systems at all times.</p>	<p>Closed systems were in place for all produced water and oil associated with production, processing and storage, except those used for sampling only.</p>
14	E.2.j	<p>Meteorological Station. The operator shall maintain and operate a meteorological station at the oil field in good operating condition and in compliance with all applicable Environmental Protection Agency ("EPA") and SCAQMD rules, regulations, and guidelines, and to the satisfaction of the director. The operator shall conduct an audit of the meteorological station on an annual basis and submit the results of the audit to the SCAQMD and the director. The operator shall maintain the data files for the meteorological station for a period of not less than 10 years. All such data shall be available upon request to the SCAQMD and the director.</p>	<p>FM O&amp;G maintains and operates a meteorological station at the field in compliance with this policy. The 2016 annual audit is projected to be submitted in the spring or summer of 2017. FM O&amp;G maintains data files for the station from CSD inception to present.</p>

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#	CSD Section/ Plan	CSD Language	Compliance Description
15	E.2.k	Updated Health Risk Assessment. After every five years of operation of the meteorological station, the operator shall provide the previous five years of metrological data to the SCAQMD and the director. If the SCAQMD or the director determines that the previous five years of metrological data from the oil field could result in significant changes to the health risk assessment that was conducted as part of the Baldwin Hills Community Standards District Environmental Impact Report, then the county may elect to re-run the health risk assessment using the previous five years of metrological data from the meteorological station.	The first five years of data was submitted to the SCAQMD and the Director on 12/2/15. The next five years of data is due in 2020.
16	E.2.l	Off-Road Diesel Construction Equipment Engines. All off-road diesel construction equipment shall comply with the following provisions:  i. Utilize California Air Resources Board ("CARB") EPA Certification Tier III or better certified engines or other methods approved by the CARB as meeting or exceeding the Tier III standard or Tier II certified engines as long as no drilling or redrilling occurs during construction.  ii. Utilize a CARB Verified Level 3 diesel catalyst. The catalyst shall be capable of achieving an 85 percent reduction for diesel particulate matter. Copies of the CARB verification shall be provided to the director. Said catalysts shall be properly maintained and operational at all times when the off-road diesel construction equipment is in use.	All off-road diesel construction equipment engines utilized Tier III or better diesel engines plus Level 3 CARB verified diesel catalysts during all construction projects in 2016.
17	E.2.m	Drill Rig Engines. All drilling, redrilling, and reworking rig diesel engines shall comply with the following provisions:  i. Utilize CARB/EPA Certification Tier II or better certified engines, or other methods approved by CARB as meeting or exceeding the Tier II standard.  ii. Utilize second generation heavy duty diesel catalysts capable of achieving 90 percent reductions for hydrocarbons and for particulate matter smaller than 10 microns. Said catalysts shall be properly maintained and operational at all times when the diesel engines are running.	No drilling occurred in 2016.
18	E.2.n.	Drilling and Redrilling Setbacks. The following setbacks shall apply within the oil field for drilling or redrilling: i. At least 400 feet from developed areas. ii. At least 20 feet from any public roadway.	All required drilling and redrilling setbacks set forth in this policy were complied with as documented in the 2016 Drilling Plan and all subsequent, individual well permits approved by the County. However, no drilling or redrilling occurred in 2016.
19	E.2.o	Construction Schedule. To reduce construction air emissions, no overlap shall be permitted in major facility construction and installation activities such as the steam drive plant, the water processing facility, or the oil cleaning plant.	There was no overlap in construction activity since no steam drive plant, water processing facility or oil cleaning plant were installed in 2016.
20	E.2.p	Fugitive Dust Control Plan. The operator shall comply with the provisions of a fugitive dust control plan that has been approved by the director. The plan shall be based upon the requirements of SCAQMD Rule 403 and the SCAQMD CEQA Guideline Fugitive Dust Control Measures. The fugitive dust control plan shall be reviewed by the operator every five years to determine if modifications to the plan are required. Any modifications to the fugitive dust control plan shall be submitted to the director for review and approval. The fugitive dust control plan shall include any measured requested by the director.	The Fugitive Dust Control Plan was submitted on March 26, 2009 and revised and approved in April 2010. Compliance with the provisions of the Plan are verified by the County ECC. FM O&G reviewed the Plan on 11/21/16 and determined that no modifications to the plan are required. The County was notified of this determination on 11/21/16.
21	E.3.a	Natural Gas Liquid Blending. Natural gas liquids at the gas plant shall be blended with the oil to the maximum allowable pipeline system vapor pressure. Natural gas liquids storage shall be limited to the volume allowed in the risk management plan approved by the fire department.	FM O&G blends the natural gas liquids (NGLs) to the maximum allowable pipeline system vapor pressure as required by the subject CSD provision requirement. The storage of the NGL tank is in compliance with the criteria in the Risk Management Plan. The LA County Fire Department verifies compliance with this provision via site inspections.

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22	E.3.b	Propane and Natural Gas Liquids Bullet Fire-Proofing. The operator shall install and maintain fire-proofing insulation on all propane and natural gas liquids bullets within the oil field. The fire-proofing insulation shall have a minimum two hour fire rating and otherwise be acceptable to the fire chief. All propane and natural gas liquid bullets shall be equipped with an automatic deluge system.	The propane and natural gas liquids bullet fire proofing was completed on February 23, 2009 with the associated documentation submitted to the LA County Fire Department on February 25, 2009.
23	E.3.c	Steam Drive Plant Setback. The steam drive plant, if constructed, shall be located at least 1,000 feet from a developed area and shall use urea or equivalent, low toxicity material for any nitrogen oxide emission reduction that is required by the SCAQMD.	A steam drive plant has not been proposed or constructed to date.
24	E.3.d.i	The operator shall ensure that all existing oil tank areas in the oil field, unless determined by the director to be infeasible, and all the new oil tank areas shall have secondary containment (berms and/or walls) that can contain at least 110 percent of the largest oil tank volume to reduce the likelihood of oil spills entering the retention basins. In the event the director determines that it would be infeasible to provide 110 percent containment for a particular existing oil tank, the operator shall provide such containment as the director determines is feasible.	As documented in the PXP 2009 Tank Leak Detection and Containment at Inglewood Oil Field report, approved in May 2009, all tanks have secondary containment per this provision.
25	E.3.d.ii	All retention basins in the oil field shall be adequately sized, and maintained to handle a 100-year storm event plus a potential spill of the volume of the largest tank that would drain into each basin.	The PXP Retention Basin Study, completed in March 2009 and revised in September 2009 and January 2010, analyzed and modeled the capacities of the basins along with a 100 year storm event. The study concluded that the onsite basins have the capability to handle a 100 year storm event without flooding per the CSD requirement. The study further determined that in the event of an oil tank failure during a 100 year storm event, the basin weir system would prevent oil from going offsite. The County Public Works Department has reviewed and approved the retention basin capacities.
26	E.3.d.iii	All above ground piping in the oil field that contains or could contain oil shall be protected by basins or secondary containment measures (berms and/or walls).	Most of the above ground piping throughout the oil field is not protected by individual pipeline specific secondary containment or basin structures; however, the oil field retention basin system prevents any fluid from the above ground piping from traveling offsite.
27	E.4.a.i, ii and iii	<ul style="list-style-type: none"> <li>i. All proposed grading shall be subject to prior review and approval by the director of public works.</li> <li>ii. Grading involving up to 5,000 cubic yards and grading associated with the bioremediation farms may be undertaken pursuant to a county master grading plan stamped by a registered professional engineer and a California certified engineering geologist and approved by the director of public works.</li> <li>iii. No slope of cut or fill shall have a gradient steeper than two to one (2:1) unless specifically approved by a site specific geotechnical report.</li> <li>iv. Cuts and fills shall be minimized to avoid erosion and visual impacts.</li> </ul>	FM O&G conducts all grading in accordance with the approved Master Grading Plan as approved by the LA County Department of Public Works (DPW). The 2017 Master Grading Plan is the same as the 2016 Master Grading Plan, which was submitted to DPW on 11/24/15 and was approved on 04/15/2016.
28	E.4.b.ii	A site-specific geotechnical investigation shall be completed for grading in excess of 5,000 cubic yards, unless associated with the on-site Bioremediation Farms and approved pursuant to a master grading plan approved by the director of public works, and for any grading that supports or impacts a critical facility as determined by the director. The investigation shall be completed by a California certified engineering geologist and submitted to the director and the director of public works for review and approval, in conjunction with an application for a revised grading permit.	No grading that occurred in 2016 triggered the requirement for a site specific geotechnical investigation.
29	E.4.b.ii	A site-specific geotechnical investigation shall be completed for all proposed permanent structures. The investigation shall include analysis and recommendations associated with potential seismically induced ground failure, such as differential settlement and lateral spreading. The geotechnical investigation shall be completed by a California-certified engineering geologist and submitted to the director of public works for review and approval.	No permanent structures were proposed or built in 2016; hence no site specific geotechnical investigations were necessary.



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30	E.4.c.i	The operator shall comply with all provisions of an erosion control plan that has been approved by the director. The erosion control plan shall be reviewed by the operator every two years to determine if modifications to the plan are required. Any modifications to the erosion control plan shall be submitted to the director for review and approval. The erosion control plan shall include any measures requested by the director.	The PXP 2009 Erosion Control Plan Inglewood Oil Field was initially submitted on May 26, 2009, revised in October 2009 and approved by County Public Works in May 2010. FM O&G reviewed the Erosion Control Plan on 5/4/16 and determined that no modifications to the plan are required. The next bi-annual review will occur in May of 2018.
31	E.4.d	Restoration of Slopes. Slopes shall be restored to their original grade once the use that required the grading of the slope has been discontinued. However, if restoration of a slope would negatively affect existing drainage patterns or slope stability, then the slope shall be restored to a grade that avoids these negative effects.	No grading that would negatively affect existing drainage patterns or slope stability occurred in 2016.
32	E.4.e	Ground Movement Surveys. The operator shall conduct ground movement surveys once every 12 months, or more frequently if determined necessary by the director of public works, following all provisions of a ground movement monitoring plan that is acceptable to DOGGR and the director of public works, that calls for both vertical and horizontal ground movement surveys, at specified survey locations within, and in the vicinity of, the oil field, utilizing high precision Global Positioning System technology, in combination with a network of ground stations (or any alternative technology specified in the ground movement monitoring plan approved by the director of public works), and following other survey methods outlined in the plan. The surveys shall be conducted by a California-licensed surveyor. The survey results shall be analyzed in relation to oil field activities, such as production, steam injection, and water flooding, taking into consideration individual oil producing zones, injection schedules, rates, volume, and pressure. The analysis shall be completed in collaboration by a California-registered professional petroleum engineer, registered geotechnical engineer, and certified engineering geologist. The results of the annual monitoring survey and analysis shall be forwarded to DOGGR and the director of public works. If requested by DOGGR or the director of public works, the operator shall make modifications to the ground movement monitoring plan. In the event that survey indicates that on-going ground movement, equal to or greater than 0.6 inches at any given location, or a lesser value determined by the director of public works is occurring in an upward or downward direction in the vicinity of or in the oil field, the operator shall review and analyze all claims or complaints of subsidence damage that have been submitted to the operator or the county by the public or a public entity in the 12 months since the last ground movement survey. Based thereon, the operator shall prepare a report that assesses whether any of the alleged subsidence damage was caused by oil operations and submit said report to DOGGR and the department of public works. The department of public works shall review the report to determine if it concurs with its conclusions. If the report concludes that damage has not been caused by oil operations, and the department of public works does not concur in that conclusion, it shall forward its conclusions to DOGGR for its review and possible action. If the report concludes that damage was caused by oil operations and the department of public works concurs with any such conclusion, the department of public works shall forward the department of public works' conclusions to DOGGR and ask DOGGR to evaluate the operator's fluid injection and withdrawal rates to determine whether adjustments to these rates may alleviate the ground movement, and if so, where in the oil field such adjustments should be made. The operator shall implement whatever adjustments in the rates of fluid injection and/or withdrawal that DOGGR determines are necessary and appropriate to alleviate any ground movement damage. The county shall promptly notify the CAP of any such action that is taken pursuant to this subsection. Injection pressures associated with secondary recovery operations (i.e., water flooding) or disposal of produced fluids shall not exceed reservoir fracture pressures as specified in Title 14 of the California Code of Regulations, section 1724.10, and as approved by the DOGGR.	Ground movement surveys have been completed as required by the approved Accumulated Ground Movement Plan. The Year 2015 annual survey was submitted on October 31, 2016 to DPW and DOGGR. Plans are to begin surveying in January 2017.  Eight monuments had a change in elevation in excess of the 0.6" threshold in Year 2015. Therefore, investigations were conducted on the two property damage claim received. The subsequent reports were submitted to County Public Works and DOGGR for review. Both reports concluded that the damage was not caused by oil field activities.
33	E.4.f	Construction of Permanent Structures. No permanent structures shall be constructed in an Alquist-Priolo Fault Zone without preparation of a fault study by a California-certified engineering geologist. Following the fault study, no permanent structures shall be placed within 50 feet of a known active fault. The fault investigation report shall be submitted to the director of public works for review and approval.	No permanent structures have been constructed in an Alquist-Priolo Fault Zone since the adoption of the CSD.

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34	E.4.g	Oil Field Accelerometer. The operator shall operate and maintain an accelerometer at the oil field to determine site-specific ground accelerations as a result of any seismic event in the region (Los Angeles/Orange County and offshore waters of the Santa Monica Bay and San Pedro Channel). Readings from the accelerometer shall be recorded at the oil field and transmitted in real-time to the Caltech Seismological Laboratory. The operator shall cease operations and inspect all oil field pipelines, storage tanks, and other infrastructure following any seismic event that exceeds a ground acceleration at the oil field of 13 percent of gravity (0.13 g) and promptly notify the director. The operator shall not reinstitute operations at the oil field and associated pipelines until it can reasonably be determined that all oil field infrastructure is structurally sound.	The oil field accelerometer seismic station was installed and began collecting data on May 20, 2009. The data is transmitted in real time by cell link to the CalTech Seismological Laboratory where the data is recorded and stored. The accelerometer has not measured ground acceleration in excess of the 13 percent of gravity (0.13 g) criteria of this provision to date, thus the oil field has not been required to shut in due to a ground acceleration event.
35	E.4.h	Pipeline Management Plan. The operator shall maintain and implement a pipeline management plan that meets the requirements of DOGGR regulations.	The pipeline management plan is being maintained per DOGGR regulations.
36	E.4.i	Paleontological Monitor. The operator shall have a qualified paleontologist, approved by the director, monitor all rough grading and other significant ground disturbing activities in paleontological sensitive sediments. The sensitive sediments that have been identified within the oil field include the Lower to Middle Pleistocene San Pedro Formation and the Middle to Upper Pleistocene Lakewood Formation. A paleontologist will not be required on site if excavation is only occurring in artificial fill or Holocene alluvium.	In 2016, no work occurred in paleontological sensitive sediments. As such, no monitoring occurred.
37	E.5.a	E.5.a Noise Limits. The operator shall comply with the following provisions: i. All oil operations on the oil field shall comply with the noise provisions of Chapter 12.08 of Title 12 of the County Code, with the exception of drilling, redrilling, and reworking, which are exempt from the provisions of said chapter. ii. Hourly, A-weighted equivalent noise levels associated with drilling, redrilling, and reworking shall not elevate existing baseline levels by more than five dBA at any developed area. For daytime activities (7:00a.m. to 7:00p.m.) existing baseline noise levels shall be defined as the maximum daytime equivalent noise level (Leq) at the closest monitoring site as shown in Table 4.9.3 of the 2008 Baldwin Hills Community Standards District Environmental Impact Report. For nighttime activities (7:00 p.m. to 7:00a.m.), existing baseline noise levels shall be defined as the minimum nighttime equivalent noise level (Leq) at the closest monitoring site as shown in Table 4.9.3 of the 2008 Baldwin Hills Community Standards District Environmental Impact Report. Updated baseline noise levels may be set and additional monitoring sites may be established, from time to time by the director. In no case shall baseline noise levels include any drilling, redrilling, or reworking operations. iii. Noise produced by oil operations shall include no pure tones when measured at a developed area.	Noise monitoring to date has not identified any violations associated with oil field operations above the baseline levels of the noise limits set forth in the CSD or Settlement Agreement.
38	SA 2	a. The CSD currently provides that hourly, A-weighted equivalent noise levels associated with drilling, redrilling and reworking wells shall not elevate baseline levels (which shall not include drilling, redrilling or reworking operations) by more than five A-weighted decibels ("dBA") at the Oil Field boundary of any Developed Area. Instead of the referenced five dB A provision, PXP shall limit the night time (10 p.m. to 7 a.m.) noise levels at Developed Areas to no more than three dBA above a one-hour baseline average for the defined nighttime period, but at no time will PXP be required to maintain noise levels below the baseline nighttime noise levels. Furthermore, PXP and the County determined the baseline noise levels at four additional Oil Field boundary locations near Developed Areas, selected by PXP and the County, in addition to the seven utilized in the EIR for a total of 11 locations. If PXP violates the above noise requirements, no new drilling or redrilling permits shall be issued by the County until PXP, in consultation with the County, identifies the source of the noise and PXP takes steps necessary to assure compliance with the above-specified threshold. b. If drilling, redrilling or reworking operations elevate nighttime baseline noise levels by more than 10 dBA for more than 15 minutes in any one hour as independently verified and determined by the County, PXP, in consultation with the County, shall identify the cause and source of the noise and take steps to avoid such extended periods of noise elevation in the future. This provision does not negate the CSD noise limits between 7 a.m. to 10 p.m.	Noise monitoring to date has not identified any violations associated with oil field operations above the baseline levels of the noise limits set forth in the CSD or Settlement Agreement.

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39	E.5.b	Backup Alarms. Backup alarms on all vehicles operating within the oil field shall be disabled between the hours of 8:00 p.m. and 8:00 a.m. During periods when the backup alarms are disabled, the operator shall employ alternate, low-noise methods for ensuring worker safety during vehicle backup, such as the use of spotters.	This provision has been implemented and is ongoing.
40	E.5.c	Quiet Mode Drilling Plan. All drilling and re-drilling on the oil field between the hours of 6:00 p.m. and 8:00 a.m. shall be conducted in conformity with a quiet mode drilling plan that has been approved by the director and the director of public health. The quiet mode drilling plan shall be reviewed by the operator every year to determine if modifications to the plan are required. The operator shall make changes to the plan if requested by the director or the director of public health. Any modifications to the quiet mode drilling plan shall be submitted to the director and the director of public health for review and approval. The quiet mode drilling plan shall include any measures requested by the director or the director of public health.	No drilling and re-drilling activities occurred in 2016. FM O&G reviewed the Quiet Mode Drilling Plan on 11/21/2016 and concluded that there are currently no modifications necessary.
41	E.5.d	Equipment Servicing. All noise producing oil field equipment shall be regularly serviced and repaired to minimize increases in pure tones and other noise output over time. The operator shall maintain an equipment service log for all noise-producing equipment.	FM O&G Operations maintains service records for such equipment.
42	E.5.e	Deliveries to the Oil Field. Deliveries to the oil field shall not be permitted after 8:00 p.m. and before 7:00a.m. except in cases of emergency. Deliveries on Sundays or legal holidays shall not be permitted after 8:00 p.m. or before 9:00a.m., except in cases of emergency.	This provision has been implemented and is ongoing.
43	E.5.f	Deliveries within the Oil Field. Deliveries to areas of the oil field located within 500 feet of any residential property shall not be permitted after 5:00 p.m. or before 7:00a.m. except in cases of emergency. Deliveries to such areas on Sundays or legal holidays shall not be permitted after 5:00 p.m. and before 9:00a.m., except in cases of emergency.	This provision has been implemented and is ongoing.
44	E.5.g	Time Limits for Construction. Construction of permanent structures shall not be permitted after 7:00 p.m. and before 7:00a.m., or during Saturdays, Sundays, or legal holidays.	No construction occurs after 7:00 p.m. and before 7:00 a.m., or during Saturdays, Sundays, or legal holidays.
45	E.5.h	Construction Equipment. All construction equipment shall be selected for low-noise output. All construction equipment powered by internal combustion engines shall be properly muffled and maintained.	All construction equipment is selected to comply with this provision.
46	E.5.i	Construction Equipment Idling. Unnecessary idling of construction equipment internal combustion engines is prohibited.	All FM O&G construction equipment operators implement this provision.
47	E.5.j	Worker Notification. The operator shall instruct employees and subcontractors about the noise provisions of this subsection E.5 prior to commencement of each and every drilling, re-drilling, reworking, and construction operation, and shall annually certify to the director that such employees and subcontractors have been properly trained to comply with such noise provisions. The operator shall prominently post quiet mode policies at every drilling and re-drilling site.	Employees and contractors were trained on the provisions of E.5 in 2016 and certification of such was provided to the DRP on 11/18/16. No drilling or re-drilling occurred in 2016.
48	E.6	Vibration Reduction. All oil operations on the oil field shall be conducted in a manner that minimizes vibration. Additionally, vibration levels from oil operations at the oil field shall not exceed a velocity of 0.25 mm/s over the frequency range 1 to 100 Hz at any developed area.	All operations are conducted to minimize vibration. The report prepared by the County in response to the request by PXP in October 2011 to increase the annual number of wells allowable for drilling or re-drilling, the Annual Well Increase Evaluation, December 2011, includes analysis on the implementation of the vibration provision of the CSD. The report concluded that the CSD requirements have been effective at keeping vibration to a level that is considered protective of the health and general welfare of the public. Further, the draft periodic review concluded that this provision is fully effective.

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49	E.7.a	Oil Spill Response. The operator shall comply with all provisions of an Emergency Response Plan ("ERP") that has been approved by the director, to protect biological species and to revegetate any areas disturbed during an oil spill or clean-up activities. The operator shall make changes to the ERP if requested by the director. Any modifications to the ERP shall be submitted to the director for review and approval. The ERP shall include any measures to protect biological species that may be requested by the director.	Since approval of the ERP by DRP, no updates have been needed or requested.
50	E.7.b	Special Status Species and Habitat Protection. The operator shall comply with all provisions of a special status species and habitat protection plan that has been approved by the director. The operator shall make changes to the plan if requested by the director. Any modifications to the plan shall be submitted to the director for review and approval. The special status species and habitat protection plan shall include any measures requested by the director.	The Special Status Species and Habitat Protection Plan was first prepared in 2009 and was approved on November 15, 2010. The plan was prepared by a County approved ecologist/biologist. Compliance with subsections E.7.b through E.7.h has been documented annually since 2010. The 2017 compliance report will be submitted in early 2017.
51	E.7.c, h	<p>c) Habitat Restoration and Revegetation Plan. Prior to any disturbance of sensitive natural habitat areas, as identified in the special status species and habitat protection plan, the operator shall hire a biologist, approved by the county, to conduct a survey of the area to determine if significant impact to sensitive natural habitat, including coastal sagebrush, coyote bush scrub, riparian scrub, and oak woodland will occur. If the biologist determines that significant impact to sensitive natural habitat will occur, then the operator shall have a county-approved restoration specialist, with expertise in southern California ecosystems and revegetation techniques, prepare a habitat restoration and revegetation plan. The plan shall be submitted to the director for review and approval. The director shall make best efforts to complete the review of the plan as expeditiously as possible and shall then either approve the plan or provide the operator with a list of specific items that must be included in the plan prior to approval. No removal of sensitive natural habitat shall occur until the plan has been approved by the director. The habitat restoration and revegetation plan shall include any measures requested by the director.</p> <p>h) Habitat Restoration. Within 60 days of completion of construction activities that have significantly impacted sensitive natural habitat, the operator shall begin habitat restoration consistent with the approved native habitat restoration and revegetation plan discussed in subsection E.7.c. Restoration priority shall be given to areas of degraded habitat connecting areas of higher quality habitat and where restoration would produce larger corridors to support the migration and movement of wildlife. The operator shall replace any significant loss of sensitive natural habitat at the following ratios:</p> <p>i. 1:1 for each acre of coastal sagebrush or coyote bush scrub.</p> <p>ii. 2:1 for each acre of riparian scrub or oak woodland.</p>	No Habitat Restoration and Revegetation Plans were necessary in 2016.

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52	E.7.d, e, f, g	<p>d) Pre-Construction Surveys. The following surveys shall be conducted prior to any significant vegetation removal in sensitive natural habitat as identified in the special status species and habitat protection plan.</p> <p>e) Listed Plant or Wildlife Species. If federal- or State-listed plant or wildlife species are found, then the operator shall comply with all applicable United States Fish and Wildlife and California Department of Fish and Game rules and regulations.</p> <p>f) Construction Monitoring. If the pre-construction surveys find sensitive plant, wildlife species, or nesting birds, a biological monitor hired by the operator, and approved by the County, shall be on site during construction to monitor the construction activities.</p> <p>g) Tree and Riparian Scrub Removal. Removal of native or non-native trees and riparian scrub vegetation shall be scheduled, as possible, for removal outside the nesting season to avoid impacts to nesting birds. If avoidance of removal of trees or riparian scrub during the recommended periods is not possible, a county-approved biologist shall perform a survey to ensure that no nesting birds are present prior to removal. If for any reason a nest must be removed during the nesting season, the operator shall provide written documentation to the director demonstrating concurrence from the United States Fish and Wildlife Service and California Department of Fish and Game authorizing the nest relocation and a written report documenting the relocation efforts.</p>	<p>All required pre-construction surveys and construction monitoring were completed in 2016 and will be documented in the 2016 Special Status Species and Habitat Protection Plan annual report (report) scheduled for submittal in early 2017. The 2016 report was submitted to DRP on 01/22/16. No listed plant or wildlife species were found. The 2017 compliance report will be submitted in early 2017.</p>
53	E.8.a	<p>Cone Trust House. Oil operations shall not result in impacts to the Cone Trust House</p>	<p>The Cone Trust House is off limits to oil field staff to prevent any impacts to the building.</p>
54	E.8.b	<p>E.8.b: Archaeological Training. The operator shall provide archeological training for all construction personnel who will be involved with ground disturbance activities at the oil field. All such construction personnel shall be required to participate in the training and will receive training material prepared by a qualified archaeologist prior to working on ground disturbance activities.</p>	<p>All construction personnel involved with ground disturbance activities were provided archeological training in 2016.</p>
55	E.8.c	<p>Construction Treatment Plan. The operator shall comply with all provisions of a construction treatment plan, approved by the director, to ensure that any new archeological discoveries are adequately recorded, evaluated, and, if significant, mitigated. In the event that unknown archeological artifacts are encountered during grading, clearing, grubbing, and/or other construction activities, work shall be stopped immediately in the vicinity of the find and the resource shall be evaluated by a qualified archaeologist, approved by the director. The construction treatment plan shall include any measures requested by the director.</p>	<p>No archaeological artifacts were uncovered In 2016.</p>
56	E.9	<p>Lighting. Outdoor lighting shall be restricted to only those lights which are required by code for the lighting of building exteriors, drilling, and redrilling rigs and for safety and security needs. In addition, the operator shall comply with the following provisions:</p> <p>a. Screening. All new point lighting sources within the oil field shall be screened and directed to confine direct rays to the oil field and to prevent offsite spillover lighting effects to the extent feasible.</p> <p>b. Lighting Plan. A detailed lighting plan shall be prepared for each new permanent structure and submitted to the director for review and approval. No work may be commenced on such permanent structure until the lighting plan therefore has been approved by the director. The lighting plan shall include any measures requested by the director.</p>	<p>In November 2008, an assessment of all oil field lighting was completed to confirm compliance with the CSD lighting provisions and to confirm that there were no offsite lighting impacts.</p>

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57	E.10 SA 11 G.7 (2015)	<p>E.10: Landscaping, Visual Screening, Irrigation and Maintenance. The operator shall comply with the conceptual landscaping plan for the oil field prepared by Mia Lehrer &amp; Associates, dated October 2008, on file at the department of regional planning, which is intended to beautify and screen the oil field from adjoining residential, recreational, and institutional areas or adjacent public streets or highways. Landscaping required by this plan shall be completed in phases over a two-to five-year period as approved by the director. All landscaping on the oil field shall be routinely inspected (on at least a monthly basis) and maintained in a neat, clean, and healthful condition, including proper watering, pruning, weeding, fertilizing, and replacement of plants as needed. Litter shall also be removed on a regular basis.</p> <p>SA 11: Landscaping. PXP agrees to prepare and implement a series of landscape plans ("Landscape Plans") that enhance the Mia Lehrer Landscape Improvements Concepts plan dated November 4, 2008 to include, but not be limited to, landscaping along or near the border of the Oil Field in consultation with the County and subject to the County's approval. PXP's Landscape Plans shall be forwarded to the CAP for review.</p> <p>PXP will use best efforts to complete installation of the first two phases of the Landscape Plans along La Brea, between Stocker and Slauson, and Ladera Crest, within nine (9) months of County's final approvals of each of those first two Landscaping Plans using best landscaping practices. PXP agrees that it will complete the entire landscaping required by the County-approved Landscape Plans within three years after approval by the County of the final phase.</p> <p>G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "FM O&amp;G schedule installation of the remaining E.10 landscaping phases to achieve the landscaping required by this provision in a timely manner.</p>	<p>All phases of landscaping have been submitted and approved. The schedule of approvals and work is summarized in the table below:</p> <table border="1" data-bbox="1817 329 2610 756"> <thead> <tr> <th>Phase</th> <th>Plan</th> <th>Landscaping</th> </tr> </thead> <tbody> <tr> <td>1 – Ladera Crest View-shed North</td> <td>Approved 5/11/11</td> <td>Completed 10/20/11</td> </tr> <tr> <td>2 – Windsor Hills/ La Brea View-shed</td> <td>Approved 10/11/11</td> <td>Completed 6/12/12</td> </tr> <tr> <td>3 – La Brea View-shed East/La Cienga Blvd.</td> <td>Approved 6/6/13</td> <td>Scheduled for after completion of Phases 6 &amp; 7 2018</td> </tr> <tr> <td>4 - La Cienga Roadway</td> <td>Approved 6/6/13</td> <td>Completed 11/10/16</td> </tr> <tr> <td>5 – La Cienga Roadway</td> <td>Approved 6/6/13</td> <td>Completed November 2014</td> </tr> <tr> <td>6 – Fairfax Avenue Roadway</td> <td>Approved by DRP 04/19/16</td> <td>Construction initiated 11/21/16</td> </tr> <tr> <td>7 – Stocker Street Roadway</td> <td>Approved by DRP 04/19/16</td> <td>Anticipate beginning 2017/2018</td> </tr> </tbody> </table>	Phase	Plan	Landscaping	1 – Ladera Crest View-shed North	Approved 5/11/11	Completed 10/20/11	2 – Windsor Hills/ La Brea View-shed	Approved 10/11/11	Completed 6/12/12	3 – La Brea View-shed East/La Cienga Blvd.	Approved 6/6/13	Scheduled for after completion of Phases 6 & 7 2018	4 - La Cienga Roadway	Approved 6/6/13	Completed 11/10/16	5 – La Cienga Roadway	Approved 6/6/13	Completed November 2014	6 – Fairfax Avenue Roadway	Approved by DRP 04/19/16	Construction initiated 11/21/16	7 – Stocker Street Roadway	Approved by DRP 04/19/16	Anticipate beginning 2017/2018
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58	E.11.a and b	<p>Oil Field Waste Removal. The operator shall comply with the following provisions:</p> <p>a) Waste Collection. All drilling, redrilling, and reworking waste shall be collected in portable steel bins compliant with United States Department of Transportation standards. Any drilling, redrilling, and reworking wastes that are not intended to be injected into a Class II Well, as permitted by DOGGR, shall be removed from the oil field no later than 30 days following completion of the drilling, redrilling, and reworking. This provision does not apply to active sumps and mud pits.</p> <p>b) Waste Discharge. No oil field waste shall be discharged into any sewer, storm drain, irrigation systems, stream or creek, street, highway, or drainage canal. Nor shall any such wastes be discharged on the ground provided that the foregoing shall not prohibit the proper use of active drilling sumps and mud pits.</p>	<p>All reworking wastes were collected in portable steel bins compliant with USDOT standards and removed from the field within 30-days of completion of the activity. No drilling or redrilling occurred in 2016. There are no sumps or mud pits on the field. No oil field waste was discharged off site.</p>																								
59	E.11.c	<p>Recycling Plan. The operator shall comply with all provisions of a recycling plan that has been approved by the director. The recycling plan shall include any elements requested by the director.</p>	<p>The Recycling Plan was approved on October 3, 2011 and has been implemented and is ongoing.</p>																								
60	E.12	<p>Construction of Private Roads. Roads and other excavations shall be designed, constructed, and maintained to provide stability of fill, minimize disfigurement of the landscape, prevent deterioration of vegetation, maintain natural drainage, and minimize erosion. Prior to construction of any new road, the operator shall prepare and submit to the director of public works for review and approval a private road construction plan. The operator shall thereafter comply with all provisions of the approved private road construction plan. All new private access roads leading off any surfaced public street or highway shall be paved with asphalt or concrete not less than three inches thick for the first 50 feet of said access road from the public street or highway.</p>	<p>No private roads have been constructed to date and all oil field activities utilize existing access roads.</p>																								

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61	E.13.a-e	<p>Signs. All signage shall comply with Part 10 of Chapter 22.52 of Title 22. In addition, the operator shall comply with the following provisions:</p> <p>a. Perimeter Identification Signs. Identification signs, at intervals acceptable to the director, shall be posted and maintained in good condition along the outer boundary line fence and along the fences adjoining the public roads that pass through the oil field. Each sign shall prominently display current and reliable emergency contact information that will enable a person to promptly reach, at all times, a representative of the operator who will have the expertise to assess any potential problem and recommend a corrective course of action. Each sign shall also have the telephone number of the county department of regional planning zoning enforcement section and the number of SCAOMD that can be called if odors are detected.</p> <p>b. Main Entrance Sign. A sign shall be posted and maintained in good condition at the main entrance of the oil field prominently displaying a telephone number by which persons may contact a representative of the operator at all times to register complaints regarding oil field operations.</p> <p>c. Other Required Signs. All identification signs, warning signs, no trespassing signs, and other signs required by county, state and federal regulations shall be properly posted and maintained in all required locations and in good condition.</p> <p>d. Well Identification Signs. Well identification signs including the well name and well number shall be posted and maintained in good condition at each well location.</p> <p>e. No Littering Signs. "No Littering" signs shall be prominently posted and maintained in good condition on all oil field entrance gates.</p>	<p>The installation of the signage required by this provision was completed upon approval of the Signage Plan dated January 2009 (Revision1) and approved by the County on May 18, 2009. In 2013, all required signage was updated to reflect the name of the new Operator of the oil field, Freeport-McMoRan Oil &amp; Gas and to remove the name of the previous Operator, Plains Exploration &amp; Production Company (PXP). By early 2017, Freeport-McMoRan Oil &amp; Gas signage will be removed completely and replaced with Sentinel Peak Resources, LLC signage to reflect the most recent change in ownership.</p>
62	E.14	<p>Painting. All oil operation-related structures visible from public roadways and surrounding properties within the oil field shall be painted or otherwise surfaced or textured with a color that is compatible with the surrounding areas and has been approved by the director. The painting or other surfacing of all structures covered by this subsection shall thereafter be maintained in good condition.</p>	<p>The painting of the Inglewood Oil Field structures and equipment was completed on November 12, 2012. The paint color, licorice, was chosen with assistance of a landscape architect and was approved by the LA County Department of Regional Planning. Maintenance of the painting and coatings of the equipment and structures at the oil field is a continuous process.</p>
63	E.15 G.7 (2015)	<p>Sumps. The operator shall comply with all of the following provisions:</p> <p>a. Sump Clean Out. All sumps that are used, installed, or maintained for use in connection with any well, and which have not been used for 90 days for the operation of or the drilling, redrilling, or reworking of such well or any other well in the vicinity, shall be cleaned out, and all oil, rotary mud, and rubbish removed.</p> <p>b. Sump Fencing. Around each sump of any depth, there shall be erected and continuously maintained a fence that encloses the sump and complies with the requirements of Sections 11.48.010 - 11.48.050, Title 11 of the County Code. This provision shall not apply to sumps that are constantly and immediately attended while drilling, redrilling, and reworking operations are proceeding as specified in Section 11.48.020, Title 11 of the County Code.</p> <p>G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "the Operator continue the use of metal and or plastic bins E.15.a and tanks consistent with current practice as the elimination of the use of below ground sumps is considered to be a significant environmental benefit.</p>	<p>There are no sumps at the Inglewood Oil Field.</p>

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64	E.16.a-d	<p>Well Cellars. All well cellars shall be constructed in accordance with the most current American Petroleum Institute standards. In addition, the operator shall comply with the following provisions:</p> <p>a. Cellar Fluids. Well cellars shall be kept free of all oil, water, or debris at all times. During drilling, redrilling, and reworking, the cellar shall be kept free of excess fluids by a pump which discharges into a waste tank, mud pit, vacuum truck, or other approved disposal system.</p> <p>b. Access to Multi-Well Cellars. All multi-well cellars exceeding three feet in depth and 25 feet in length shall have two means of entrance and exit and an additional exit for every 50 feet in length thereafter. At least one means of entrance or exit for all multi-well cellars of 25 feet in length shall be a stairway constructed to California Division of Industrial Safety standards.</p> <p>c. Single-Cellar Covers. All single-cellars shall be covered with open grating and have no openings larger than three inches at any point. Covers shall be capable of supporting vehicle weight or guardrails shall be erected to prevent vehicle access.</p> <p>d. Cellar Ladder Openings. All openings for ladders through grating shall be designed to allow exit from underside without obstruction and shall be kept free of storage of any type. Said openings shall not be less than 24 inches on either side.</p>	Implementation is ongoing where applicable.
65	E.17.a	<p>Construction Storm Water Pollution Prevention Plan ("SWPPP"). The operator shall maintain and implement all provisions of a storm water pollution prevention plan ("SWPPP") that has been inspected by the Regional Water Quality Control Board and the county department of public works. The operator shall provide the director and the director of public works with a copy of the SWPPP, and any future modifications, revisions, or alterations thereof, or replacements therefore. The SWPPP shall be updated prior to new construction activities as required by the Regional Water Quality Control Board.</p>	The DPW was provided with the most up-to-date copy of the RWQCB reviewed SWPPP on 11/26/13.
66	E.17.b	<p>Spill Prevention, Control, and Countermeasure Plan ("SPCCP"). The Operator shall maintain and implement all provisions of a spill prevention, control, and countermeasure plan ("SPCCP") which meets the requirements of the Local California Unified Program Agency and the United States Environmental Protection Agency. The operator shall provide the director and the fire chief with a copy of the SPCCP and any future modifications, revisions, or alterations thereof, or replacements therefore.</p>	FM O&G provided DRP and the Los Angeles County Fire Department (LACFD) a copy of the most up-to-date SPCC on 08/15/16.
67	E.17.c	<p>Hydrological Analysis. A site-specific hydrologic analysis shall be completed to evaluate anticipated changes in drainage patterns and associated increased runoff at the site for any new grading that results in the loss of vegetated, sandy, permeable ground areas, which could alter surface runoff at the site. The analysis shall be completed consistent with Standard Urban Stormwater Mitigation Plan regulations, as specified in the county department of public works Hydrology Manual as amended. The hydrological analysis shall be submitted to the director of public works for review and approval. The new grading that required the hydrologic analysis shall not occur until approval of the analysis by the director of public works.</p>	The hydrologic analysis has not occurred to date because no oil field projects have triggered the requirement.
68	E.18	<p>Water Management Plan. The operator shall comply with all provisions of a water management plan that has been approved by the director and the director of public works. The plan shall include best management practices, water conservation measures, the use of a drip irrigation system, and shall include provisions for the use of surface water runoff in the retention basins for dust suppression and landscaping. The plan shall also address the availability of reclaimed water for use at the oil field. The water management plan shall be reviewed by the operator every three years to determine if modifications to the plan are required. The operator shall make changes to the plan if requested by the director or the director of public works. Any modifications to the water management plan shall be submitted to the director and the director of public works for review and approval. The water management plan shall include any elements requested by the director or the director of public works. In addition, the operator shall comply with the water conservation measures and reporting requirements specified in Sections 20.09.020- 20.09.080, Title 20 of the County Code (Utilities).</p>	The Water Management Plan was initially submitted in May 2009 and was formally approved by County Public Works on August 8, 2012 and the County DRP on September 13, 2012. The County has not required any changes to the Plan since then. FM O&G reviewed the Water Management Plan on 09/11/15 and determined that no changes are necessary. The next triennial reiew will occur in September of 2018.



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69	E.19 G.7 (2015)	<p>E.19: Groundwater Monitoring. The operator shall develop, implement, and carry out a groundwater quality monitoring program for the oil field that is acceptable to the director and consistent with all requirements of the Regional Water Quality Control Board. Pursuant to the approved program, the operator shall install and maintain groundwater monitoring wells in the vicinity of each surface water retention basin, which is permitted by the Regional Water Quality Control Board. Such monitoring wells shall be completed to the base of the permeable, potentially water bearing, alluvium, Lakewood Formation, and San Pedro Formation, and to the top of the underlying, non-water bearing Pica Formation, as determined by a California-certified professional geologist. The Regional Water Quality Control Board and the director shall be regularly advised of the results of such monitoring and shall be immediately advised if such monitoring indicates a potential problem.</p> <p>G.7: The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "the Operator coordinate with the RWQCB and install additional groundwater monitoring wells if deemed necessary."</p>	<p>Groundwater sampling was conducted on a quarterly basis consistent with the provisions of the Groundwater Monitoring Program and Work plan, and monitoring reports were submitted to DRP and the Los Angeles Regional Water Quality Control Board (RWQCB).</p> <p>As noted in G.7 (2015), the RWQCB submitted a comment letter to DRP on 10/17/12 regarding the 2013 Annual Drilling Plan (E.26.c) that recommended the installation of "an up-gradient groundwater quality monitoring well (or network) that can establish water quality conditions at the perimeter of the field."</p> <p>Subsequently, in 2013, the RWQCB evaluated the field's groundwater monitoring program as part of the land treatment unit permit renewal process. The permit was amended from the prior 2010 permit to reflect the following:</p> <ul style="list-style-type: none"> <li>• Shallow wells for semi-annual monitoring (rather than the quarterly monitoring previously required in the 2010 permit) include MW-2, 3, 5, 6, 7, 8 and 9;</li> <li>• A new requirement for deep well annual monitoring of MW 11B and 13.</li> <li>• A new requirement to conduct statistical analysis of the results of the groundwater quality monitoring to identify background conditions, and changes from background conditions (if any). Regulatory action triggers were established in the event that changes from background conditions are detected.</li> </ul> <p>As such, through the 2013 land treatment unit permit renewal process, the RWQCB re-evaluated and on 2/7/13 approved the groundwater monitoring program with changes as iterated above that respond to their concerns in their 10/17/12 comment letter. Therefore, this periodic review recommendation has been fulfilled.</p>
70	E.20 G.7 (2015)	<p>Fencing. All portions of the oil field on which oil operations are conducted shall be enclosed with a fence compliant with DOGGR regulations codified at California Code of Regulations Title 14, Article 3, sections 1778 and 1779, or as may be subsequently amended by the state.</p> <p>the</p> <p>G.7: The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "the ECC and the Operator increase monitoring of the condition of the perimeter fencing and conduct any necessary repairs as soon as possible.</p>	<p>The Inglewood Oil Field is enclosed by fencing and gates compliant with the regulations cited in this provision. FM O&amp;G, now SPR, and the ECC monitor the perimeter fencing on a regular basis to ensure the integrity of the fencing is maintained.</p>

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71	E.21.a SA.12	E.21.a: Equipment Removal. All facilities that have reached the end of their useful economic life shall be properly decommissioned and removed from the oil field within one year. Areas not slated for future use shall be restored and revegetated within 90 days of termination of use, unless such restoration and revegetation would interfere with fire safety or access to oil operations. SA.12: Clean-Up Plan. The CSD requires PXP to decommission and remove facilities that have reached the end of their useful economic life (County Code section 22.44.142.E.21.a) and submit to the County for its approval an unused or abandoned equipment removal plan (County Code section 22.44.142.L.14). PXP has submitted such a plan in 2009 and shall periodically update the plan should additional equipment, not identified in PXP's original removal plan, become unused or abandoned. Equipment and materials not necessary to oil field operations as identified by the Director of Planning shall be promptly removed from view of Sensitive Developed Areas as addressed in the plan.	The equipment removal plan was updated through December 2013 and submitted to DRP on 3/3/14. No equipment became unused or abandoned since.
72	E.21.b	Equipment Maintenance. All equipment, improvements, facilities, and other personal property or fixtures located on the oil field shall be maintained in good condition to the satisfaction of the director and the director of public works.	Equipment at the oil field is inspected and maintained by the field operations staff with operators completing rounds of the facility daily.
73	E.21.c	Site Debris and Vegetation. The operator shall keep the property free of debris and vegetation overgrowth to the satisfaction of the director. All outside storage of parts or equipment shall comply with Part 7 of Chapter 22.52 of the County Code.	The Inglewood Oil Field is kept free of debris and vegetation overgrowth.
74	E.22	Security. All unmanned entrances to the oil field shall be equipped with sliding gates which shall be kept closed at all times except when authorized vehicles are entering or leaving the oil field. The operator shall have a security guard on duty 24 hours per day.	All gates at the oil field are consistent with these regulations and all unmanned entrances are equipped with the required sliding type gates.
75	E.23	Vehicle Parking. Vehicular parking shall comply with Part 11 of Chapter 22.52 of County Code.	All vehicle parking complies with the referenced code.
76	E.24.a	Sanitation. The operator shall comply with the following provisions: a. Garbage and Refuse. The oil field shall be maintained in a clean, sanitary condition, free from accumulations of garbage, refuse, and other wastes.	The field is maintained in accordance with this provision. Garbage and refuse are picked up and removed weekly by a subcontractor garbage collection company.
77	E.24.b	Toilets and Wash Facilities. Sanitary toilet and washing facilities shall be installed at any site where personnel are permanently stationed. Portable facilities shall be provided wherever crews are temporarily employed. Such facilities shall be maintained in a clean and sanitary condition at all times.	Permanent toilet and wash facilities are located at the office building, the warehouse, the gas plant, the "halfway house" across from the gas plant, and at two modular buildings used by sub-contractors. The restroom facilities are maintained by a sub-contractor janitorial service. Portable facilities are located throughout the field and moved as needed, the portable restrooms are maintained by the subcontractor providing the units.
78	E.25	Storage of Hazardous Materials. The operator shall comply with all provisions of a hazardous materials business plan that has been submitted to the fire chief. The operator shall deliver to the fire chief for review and approval an updated hazardous material business plan on an annual basis. This plan shall provide the location of where hazardous materials are stored at the oil field. Hazardous materials shall be stored in an organized and orderly manner and identified as may be necessary to aid in preventing accidents, and shall be reasonably protected from sources of external corrosion or damage to the satisfaction of the fire chief.	The annual Hazardous Materials Business Plan will be submitted to the LA County Fire Chief in March 2017.
79	E.26.a	DOGGR Regulations. All DOGGR regulations related to drilling, redrilling, and reworking operations.	Drilling, redrilling and reworking operations are in compliance with all applicable DOGGR regulations; however, no drilling or redrilling occurred in 2016.
80	E.26.b SA 3	E.26.b: Number of Drilling and Redrilling Rigs. No more than three drilling or redrilling rigs shall be present within the oil field at any one time. SA 3: Notwithstanding the CSD's allowance for operations of a maximum of three drill rigs at any one time on the Oil Field, PXP shall limit to two the number of drill rigs in use at any one time.	The approved 2016 Drilling Plan required per Section E.26.c limited FM O&G to two drilling rigs, and no more than two drilling rigs have been - or plan to be - used at any one time on the Oil Field.

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81	E.26.c SA 1	Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan. Before the end of each calendar year, the operator shall develop and deliver to the director an annual drilling, redrilling, well abandonment, and well pad restoration plan, which shall describe all drilling, redrilling, well abandonment, and well pad restoration activities that may be conducted during the upcoming calendar year. Drilling and redrilling shall be scheduled to avoid over concentration of such activities in that year in any one area if located near a developed area. The operator may at any time submit to the director proposed amendments to the then current annual plan. No drilling, redrilling, or abandonment activity may be commenced unless it is described in a current annual plan (or an amendment thereto) which has been approved by the director. The annual plan (and any amendments) shall be provided to the CAP for review and comment. All comments on the annual plan from the CAP shall be submitted to the director in writing, and, if timely submitted, will be considered as part of the director's review and approval. The director shall complete the review of the annual plan (and any amendments) within 45 days of receipt, and shall either approve the annual plan or provide the operator with a list of deficiencies. The annual plan shall comply with the provisions of this subsection, and shall include the following:...	The 2017 Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan (Plan) was submitted to the County in November 2016.
82	E.26.c SA 1	1. Slant Drilling. a. Deep Zone Wells. b. Mid-Zone Wells. c. Shallow Wells. d. Supplement Review. e. Definitions f. Environmental Consideration. g. Non-interference.	The 2016 Drilling Plan did not included any Deep zone or Mid zone wells that would be subject to a supplement review.
83	E.26.d	Drill Rig Engines. All engines used for drilling and redrilling operations shall be operated by muffled internal-combustion engines or by electric motors.	No drilling or redrilling activities occurred in 2016.
84	E.26.e	Fire Safety Regulations. All drilling, redrilling, and reworking shall be in conformance with applicable fire and safety regulations.	No drilling or redrilling activities occurred in 2016.
85	E.26.f SA 6	E. 26.f: New Technology. Proven reasonable and feasible technological improvements which are capable of reducing the environmental impacts of drilling and redrilling shall be considered as they become, from time to time, available. SA 6: Clean Technology Assessment. The CSD requires PXP to consider proven reasonable and feasible technological improvements which are capable of reducing the environmental impacts of drilling and redrilling. (County Code section 22.44.142.E.26.f) The CSD also requires that the Annual Drilling Plan include a discussion of the latest equipment and techniques that are proposed for use as part of its drilling and redrilling program to reduce environmental impacts. (County Code section 22.44.142.E.26.c.ix) Pursuant thereto, PXP shall address in each Annual Drilling Plan the availability and feasibility of the use of natural gas-powered drill rigs or other technology capable of reducing environmental impacts, for the drilling of wells proposed in the Annual Drilling Plan (collectively " Clean Technology"). During the Periodic Review provided in 22.44.142 G.7, the County will evaluate such technology for brand new equipment that PXP intends to lease, acquire or otherwise use and require PXP to implement such technology to the extent the technology is feasible and available on a commercially reasonable basis.	New technology for reducing the environmental impacts of drilling and redrilling is discussed in the annual drilling plans required per E.26.c. The discussion includes an applicability overview of electric rigs, coil tubing rigs, diesel, electric rigs, and natural gas-electric rigs along with the potential feasibility of their use at the Inglewood Oil Field.
86	E.26.g	Derricks and Portable Masts. All derricks and portable masts used for drilling, redrilling, and reworking shall meet the standards and specifications of the American Petroleum Institute as they presently exist or as may be amended.	No drilling or redrilling activities occurred in 2016.
87	E.26.h	Equipment Removal. All drilling and redrilling equipment shall be removed from the site within 90 days following the completion of drilling or redrilling activities unless the equipment is to be used at the oil field within five days for drilling or redrilling operations.	No drilling or redrilling activities occurred in 2016.
88	E.26.i	Drill Site Conditions. All drilling sites shall be maintained in a neat and orderly fashion.	No drilling or redrilling activities occurred in 2016.

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89	E.26.j	Belt Guards. Belt guards shall be required over all drive belts on drilling, redrilling, and reworking equipment. Guarding shall be as required by Title 8 of the California Code of Regulations, section 6622, or as may be subsequently amended.	No drilling or redrilling activities occurred in 2016.
90	E.26.c.x G.7 (2015)	E.26.c.x: The annual plan shall include the following: A topographic vertical profile showing proposed location of new wells that reflects local terrain conditions and that addresses the potential visibility of existing and proposed wells and other production facilities from residential and recreation areas. G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that the consideration of "considering removing the subject figures/maps from the Annual Drilling Plan until the information is deemed useful for inclusion in future plans."	The 2016 Drilling Plan was submitted on 9/17/15. The related recommendation resulting from the Final 2015 Periodic Review was not formalized until 10/28/15; hence, the topographic vertical profiles were included in the 2016 plan. They were not included in the 2017 Drilling Plan that was submitted on 11/04/16.
91	E.27.a	Limits on Processing Operations. Unless otherwise expressly required by DOGGR, the only processing operations permitted at the well site shall be the dehydration of oil and gas produced from the well; the storage, handling, recycling, and transportation of such materials; and those processing operations required for water injection purposes.	In 2016, the only processing that occurred at the oil field was associated with the dehydration of oil and gas; the storage, handling, recycling, and transportation of those materials; and water injection operations.
92	E.27.b	Refining. No refining shall be conducted within the oil field.	In 2016, no refining occurred within the oil field.
93	E.27.c	Well Pump Motors. All well pumping units shall be operated by electric motors.	In 2016, all well pump motors at the oil field were powered electrically.
94	E.27.d	Well Pumps. Downhole submersible pumps and low-profile pumping units for production wells must be used wherever feasible.	In 2016, downhole submersible pumps and low-profile pumping units for production wells were used wherever feasible.
95	E.27.e	Removal by Pipeline Only. All oil, gas, and other hydrocarbons produced from any well in the oil field shall be shipped and transported through pipelines, except in case of an emergency or when access to a pipeline becomes unavailable. Excluded from this requirement are propane and other related natural gas liquids that are in amounts in excess of what can be blended into the pipeline. Should any pipeline through which oil or gas is currently transported become unavailable for the safe transportation of said products due to maintenance problems with the pipeline, or lack of sufficient capacity within the pipeline to handle the volume of oil and gas needing transportation, or because the owner or operator of such pipeline elects to discontinue transporting oil or gas through such pipeline, then the operator shall within 180 days of the date the existing pipeline becomes unavailable, seek to acquire a private right of way or easement, or shall file an application for a right of way, easement, encroachment permit, or franchise for the construction of a replacement pipeline and shall diligently prosecute such application until such pipeline is completed. During any emergency situation, or during such time as any existing pipeline becomes unsafe or unavailable, oil and gas may be transported by truck until the emergency situation is resolved or until a replacement pipeline shall be permitted and constructed in compliance with all applicable laws and regulations.	In 2016, all oil, gas, and other hydrocarbons produced in the oil field were shipped and transported via pipelines, and all natural gas liquids were blended into the oil and transported by pipeline.
96	E.27.f	Pipelines. The operator shall comply with the following provisions: i. New pipelines that remove oil or gas from the oil field shall be buried below the surface of the ground; ii. All pipelines which are not enclosed within a fence shall be placed underground or covered with materials approved by the fire chief. Said covers shall be maintained in a neat, orderly, and secure manner; iii. Any and all water or brine produced during pipeline construction shall either be injected in accordance with DOGGR requirements, or disposed of in accordance with other local, state or federal regulations; iv. New pipeline corridors shall be consolidated with existing pipelines or electrical transmission corridors where feasible; and v. Upon completion of pipeline construction, the site shall be restored to the approximate previous grade and condition.	No new pipelines that transport oil or gas from the oil field have been constructed since the adoption of the CSD. The oil field is completely fenced in with chain link fencing that meets the DOGGR requirements, thus all oil field pipelines are also enclosed by a fence. All water or brine generated at the oil field is injected in accordance with DOGGR requirements. Pipeline construction within the oil field is consolidated to the maximum feasible in existing pipeline routes and corridors.

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97	E.27.g	Active Pipeline Plot Plan. The operator shall submit to the fire chief a plot plan depicting the approximate location of all active pipelines regulated by the United States Department of Transportation or California State Fire Marshall owned by the operator that are located outside the outer boundary line, including waste water, and trunk and gathering lines to transport oil or petroleum products. The plot plan shall be submitted within 30 days of the installation of any new pipelines or the relocation of an existing pipeline.	The active pipeline plot plan was submitted to the Fire Department on December 9, 2009 and has not been required to be updated to date.
98	E.27.h	Machinery Enclosures. The operator shall maintain enclosures around machinery with moving parts consisting of a fence, screening, or housing. Said enclosures shall be installed in compliance with Section 11.16.020, Title 11 of the County Code.	In 2016, all enclosures around machinery subject to this provision were maintained in compliance with Section 11.16.020, Title 11 of the County Code.
99	E.27.i	Opening Protections. The operator shall cap, close, or protect the openings in all oil wells, test holes, and similar excavation in compliance with Section 11.54.010, Title 11, of the County Code.	In 2016, all openings in all oil wells, test holes, and similar excavation in compliance were capped, closed, or protected in compliance with Section 11.54.010, Title 11, of the County Code.
100	E.28.a	a. DOGGR Regulations. The operator shall comply with all DOGGR regulations related to well reworking operations.	In 2016, all DOGGR regulations related to well reworking operations were complied with.
101	E.28.b G.7 (2015)	E.28.b: Number of Reworking Rigs. No more than eight reworking rigs shall be present within the oil field at any one time, unless an emergency condition requires additional Reworking rigs. This does not include equipment used for well maintenance or well abandonment. G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "the Operator facilitate better coordination when scheduling reworking and the other types of rigs at the oil field to avoid concentrating too many rigs in one area.	In 2016, no more than eight reworking rigs were present on the oil field at any one time not including equipment used for well maintenance and well abandonment. Since issuance of the associated recommendation from the Final 2015 Period Review Final Report, FM O&G ensured that reworking rigs are not overconcentrated in one area.
102	E.28.c	Hours of Operation. With exception of emergencies, well reworking operations shall not be allowed after 7:00 p.m. or before 7:00 a.m., nor on Sundays or legal holidays.	In 2016, reworking rigs did not operate outside 7:00 am to 7:00 pm or on Sundays or legal holidays except in emergencies.
103	E.28.d	Specifications. Reworking rigs shall meet the standards and specifications of the American Petroleum Institute.	In 2016, all reworking rigs met the standards and specifications of the American Petroleum Institute.
104	E.28.e	Equipment Removal. Reworking rigs shall be removed from the oil field within seven days following the completion of reworking operations unless such rig will be used on another well at the oil field within five days.	In 2016, all reworking rigs were removed from the oil field within seven days following completion of the operations unless it was scheduled for use at another well within five days.
105	E.29.a	New Tank Specifications. All new tanks and appurtenances shall be designed, constructed, installed, and maintained in accordance with current County Fire Code, American Petroleum Institute, DOGGR, California Division of Industrial Safety, Environmental Protection Agency Standards, applicable provisions of Title 14 of the California Code of Regulations section 177 4, and applicable CalARP Program requirements.	No new tanks were constructed in 2016.
106	E.29.b	Setbacks. No new storage Tank, excluding a replacement tank, shall be constructed closer than 500 feet from any developed area, or closer than 200 feet from a public road. No building shall be constructed within 50 feet of any oil storage tank.	No new tanks were constructed in 2016. No new buildings were constructed within 50 feet of any oil storage tank in 2016.
107	E.29.c	Vapor Recovery. Oil, wash, and produced water tanks shall be vapor tight and shall be equipped with a vapor recovery system.	In 2016, all oil, wash and produced water tanks were vapor tight and equipped with a vapor recovery system.
108	E.29.d	Specifications for New Tank Piping, Valves, Fittings, and Connections. All new tank piping, valves, fittings, and connections including normal and emergency relief venting, shall be installed and maintained in accordance with current American Petroleum Institute standards to the satisfaction of SCAQMD and DOGGR.	In 2016, all equipment covered by this provision were installed and maintained in accordance with current API standards to the satisfaction of SCAQMD and DOGGR.

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109	E.29.e	Detection of Tank Bottom Leaks. The operator shall design, implement, and comply with a program, approved by the fire chief, for controlling and detecting tank bottom leaks on all tanks at the oil field. The operator may use a combination of methods including but not limited to diversion walls, dikes, tank foundations of concrete or gravel, and a tank bottom leak detection system in compliance with Title 14 of the California Code and Regulations section 1773, or subsequently enacted state regulations regarding tank bottom leaks.	All tanks at the Inglewood Oil Field have a program to detect tank bottom leaks as approved by the Fire Department on 2/18/10 in the Tank Leak Detection and Containment Plan.
110	E.30	Well and Production Reporting. The operator shall deliver annual production reports to the director and the fire chief. The reports shall provide the following information: a. A copy of all DOGGR Forms 110 and 110B submitted during the previous 12 months. b. Number and mapped location of wells drilled or redrilled, including well identification numbers. c. Number and mapped location of water injection wells, including well identification numbers. d. Number and mapped location of idled wells, including well identification numbers and the date each well was idled. e. Number and mapped location of abandoned wells, including date each well was abandoned and/or re-abandoned. f. Any additional information requested by the director or the fire chief.	The 2016 well and production reporting will be submitted to the DRP and Fire Chief in March.
111	E.31	Idle Well Testing and Maintenance. The operator shall comply with Title 14 of the California Code of Regulations section 1723.9 regarding testing and maintenance of idle wells, or subsequently enacted state regulations regarding testing and maintenance of idle wells. The operator shall carry out all additional tests, remedial operations, and mitigation measures required by DOGGR if any idle wells do not meet the test standards.	In 2016, all required testing and maintenance of idle wells was carried out in accordance with all applicable regulations.
112	E.32	Abandoned Well Testing. The operator shall conduct annual hydrocarbon vapor testing of areas within the oil field that contain abandoned wells. The testing shall be done using a soil gas vapor probe, or another method approved by the director. The results of the testing shall be submitted to the director and DOGGR on an annual basis. Abandoned wells that are found to be leaking hydrocarbons that could affect health and safety shall be reported to the director and DOGGR within 24 hours of the abandoned well test. If directed by DOGGR, the operator shall re-abandon the well in accordance with DOGGR rules and regulations. If the test results for an abandoned well area are at or below the background levels for two consecutive years that area shall thereafter be tested every five years.	The 2016 abandoned well testing was submitted to the DRP and DOGGR on 07/12/16.
113	E.33	Well and Well Pad Abandonment. If DOGGR orders the operator to plug and abandon any wells on the oil field, the operator shall deliver to the fire department, on a timely basis, all notices of intent to plug and abandon a well that the operator files with DOGGR and shall commence promptly and proceed diligently with the plugging and abandonment operations in accordance with DOGGR rules and regulations and the terms of the DOGGR permit to plug and abandon the well. Well abandonment may commence once all necessary permits and approvals are obtained. If the well pad associated with the abandoned well does not contain other production, injection, or idle wells, and will not be used for future drilling, then the operator shall promptly abandon the well pad consistent with the following provisions: Closure of Sumps. The operator shall clean out all sumps, cellars, and ditches, and level and fill all sumps and depressions pursuant to DOGGR requirements. If sumps are lined with concrete, bottoms and walls shall be broken up and removed. Sumps shall be closed in accordance with Regional Water Quality Control Board and California Department of Toxic Substances Control requirements. b. Well Pad Site Cleanup. The operator shall leave the site entirely free of oil, rotary mud, oil-soaked earth, asphalt, tar, concrete, litter, debris, and other substances to the satisfaction of DOGGR and in compliance with federal requirements. c. Contaminated Materials. All contaminated soils and materials within the well pad boundaries shall be removed and treated or disposed of in accordance with all local, county, State, and federal regulations. d. Well Pad Revegetation. The Well pad shall be revegetated following the requirement of the native habitat restoration plan.	DOGGR has not ordered any wells to be plugged or abandoned pursuant to this requirement. The oil field does not contain any sumps and sumps are no longer used at the oil field. Existing well pads have been cleaned up but are not scheduled for abandonment or restoration so they may be re-used to avoid the impact of developing new well pad areas.

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114	E.34	County Request for Review of Well Status. The director may periodically review the status of the operator's wells and submit to DOGGR a list of wells the director believes should be plugged and abandoned as specified in Public Resources Code section 3206.5 or any subsequently enacted state law related to a local jurisdiction's right to request state-agency review of idle wells.	The County has not requested that DOGGR require the Operator to plug or abandon any wells pursuant to this provision.
115	E.35 SA 14	E.35: Reduced Throughput Triggering Review. When oil or gas throughput is less than 630 barrels per day, the director shall conduct a public hearing to determine if shut down of the oil field or other action are appropriate. SA 14: CSD Review Based On Reduced Production. When production drops to three percent of the estimated peak production of 21,000 barrels of oil per day, the County will review the CSD to consider whether modifications or closure of the Oil Field is necessary or appropriate or at such earlier date as the County determines appropriate.	The oil field has not reached the production levels that trigger this review and this provision has not been activated to date.
116	E.36	Abandonment Procedures. Within 180 days of permanent facility shut down, the operator shall submit an abandonment plan to DOGGR and submit to the director for review and approval a time line for facility removal, site assessment, and remediation as necessary. The operator shall begin abandonment of the site no later than 20 days after the director's approval of the timeline, and shall provide to the director quarterly updates on the abandonment process until such time as the oil field is abandoned and remediated. The operator shall post a performance bond to insure compliance with all provisions of this subsection and the operators and landowners shall continue to pay property taxes at the rates assessed during oil field operation until all site restoration work has been fully completed, as determined by the director.	The facility has not shut down; hence, this provision is not applicable to date.
117	F.1.a, b	Environmental Quality Assurance Program ("EQAP"). The operator shall comply with all provisions of an environmental quality assurance program that has been approved by the director. The following provisions relate to the EQAP: a. EQAP Requirements. The EQAP shall provide a detailed description of the steps the operator shall take to assure compliance with all provisions of this section, including but not limited to, all of the monitoring programs called for by this section. b. Annual EQAP Reports. Within 60 days following the end of each calendar year, the operator shall submit to the director an annual EQAP report that reviews the operator's compliance with the provisions of the EQAP over the previous year and addresses such other matters as may be requested by the director. The annual EQAP report shall include the following: i. A complete list and description of any and all instances where the provisions of the EQAP, or any of the monitoring programs referred to therein or in this section, were not fully and timely complied with, and an analysis how compliance with such provisions can be improved over the coming year. ii. Results and analyses of all data collection efforts conducted by the operator over the previous year pursuant to the provisions of this section.	This 2016 annual EQAP report was submitted on 02/27/16 in compliance with this provision.
118	F.1.c	EQAP Updates. The EQAP shall be updated as necessary and submitted to the director for approval along with the annual EQAP report. The EOAP updates shall be provided to the CAP and MACC for review and comment. Comments from the CAP and MACC, if timely received, shall be considered by the director before making a decision to approve the same. The director shall complete the review of EQAP updates as soon as practicable, and shall either approve the updated EOAP or provide the operator with a list of specific items that must be included in the EOAP prior to approval. The operator shall respond to any request for additional information within 30 days of receiving such request from the director, unless extended by the director.	The EQAP was approved by the County in February 2009 and was revised on August 25, 2009. No updates have been necessary to date.

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119	F.2	<p>Environmental Compliance Coordinator. The operator shall recommend and fund the environmental compliance coordinators. The number of environmental compliance coordinators shall be determined by the county and shall take into account the level of oil operations at the oil field. The environmental compliance coordinator(s) shall be approved by, and shall report to, the director. The responsibilities of the environmental compliance coordinator(s) shall be set forth in implementation guidelines that may be developed by the county for the oil field and shall generally include:</p> <ul style="list-style-type: none"> <li>a. On-site, day-to-day monitoring of construction or drilling and redrilling activities as determined by the director.</li> <li>b. Taking steps to ensure that the operator, and all employees, contractors, and other persons working in the oil field, have knowledge of, and are in compliance with all applicable provisions of this section.</li> <li>c. Evaluating the adequacy of drilling, redrilling, and construction impact mitigations, and proposing improvements to the operator or contractors and the county.</li> <li>d. Reporting responsibilities to the various county agencies with oversight responsibility at the oil field, as well as other agencies such as DOGGR, and SCAQMD.</li> </ul>	<p>An ECC position has been funded by the operator as required by this provision since the adoption of the CSD. The ECC site inspections are coordinated with oil field management to gain access to oil field staff, oil field contractors and for access to the oil field to check on the compliance provisions of the CSD. The ECC also participates in reviewing and commenting of all plans submitted by the Operator in compliance with the CSD.</p>
120	F.3.a	<p>Safety Inspection, Maintenance, and Quality Assurance Program ("SIMQAP"). The operator shall comply with all provisions of a safety inspection, maintenance, and quality assurance program that has been approved by the director and the fire chief.</p> <ul style="list-style-type: none"> <li>a. SIMQAP Requirements. The SIMQAP shall, at a minimum provide for: <ul style="list-style-type: none"> <li>i. Inspection of construction techniques;</li> <li>ii. Regular maintenance and safety inspections;</li> <li>iii. Periodic safety audits;</li> <li>iv. Corrosion monitoring and leak detection; and</li> <li>v. Inspections of all trucks carrying hazardous and/or flammable material prior to loading.</li> </ul> </li> </ul>	<p>The SIMQAP was approved on 4/13/11, is implemented and ongoing.</p>
121	F.3.b	<p>SIMQAP Updates. The operator shall periodically review and revise the SIMQAP to incorporate changes in procedures, and new safety and maintenance technologies and procedures. The operator shall make such revisions at least every five years, or more frequently, if the operator determines changes are necessary or if requested by the director or the fire chief. The operator shall submit SIMQAP updates to the director and the fire chief for their review and approval. The director shall complete the review of SIMQAP updates as soon as practicable, and shall either approve the updated SIMQAP or provide the operator with a list of specific items that must be included in the SIMQAP prior to approval. The operator shall respond to any request for additional information within 30 days of receiving such request from the director, unless extended by the director.</p>	<p>The SIMQAP was approved on 4/13/11. To date, no revisions to the SIMQAP have been necessary.</p>
122	F.3.c	<p>Worker Notification. The operator shall ensure that all persons working on the oil field comply with all provisions of the currently approved SIMQAP.</p>	<p>All persons working on the oil field in 2016 received SIMQAP training.</p>
123	F.3.d	<p>Inspections. The SIMQAP shall provide for involvement of county staff or the environmental compliance coordinator in all inspections required by this section.</p>	<p>The approved SIMQAP provides for the involvement of County staff or the ECC in all required inspections.</p>



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124	F.4	Annual Emergency Response Drills of the County and Culver City Fire Departments. The operator shall demonstrate the effectiveness of the emergency response plan by responding to one planned emergency response drill per year which shall be conducted in conjunction with the county and Culver City fire departments. Emergency response drills required by other agencies that involve the county and Culver City fire departments can be used to satisfy this provision. In addition, the operator shall demonstrate the effectiveness of the emergency response plan by responding to not more than two unannounced drills each year which may be called by the county fire department at the oil field. If critical operations are then underway at the oil field, the operator need not respond to a unannounced drill to the extent such a response would, as a result of such critical operations, create an undue risk of personal injury or property damage, but in such case the operator must promptly explain the nature of the critical operations, why response is not possible, and when the critical operations will be completed.	The 2016 emergency response drill was conducted on November 3, 2016. Representatives from both LA County and Culver City Fire Departments representatives attended. The County ECC and representatives from the California Department of Fish and Wildlife also attended and participated in the drill.
125	F.5	Noise Monitoring. The public health department shall retain an independent qualified acoustical engineer to monitor ambient noise levels in the areas surrounding the oil field as determined necessary by the director or the director of public health. The monitoring shall be conducted unannounced and within a time frame specified by the director or the director of public health. Should noise from the oil operations exceed the noise thresholds specified in this section, no new drilling or redrilling permits shall be issued by the county until the operator in consultation with the director and director of public health identifies the source of the noise and the operator takes the steps necessary to assure compliance with thresholds specified in this section. The results of all such monitoring shall be promptly posted on the oil field web site and provided to the CAP.	No exceedances of the noise regulations in the County Code or of the noise limits specified subsection E.5.a of the CSD were reported to FM O&G by the DPH.
126	F.6	Vibration Monitoring. The public health department shall retain an independent qualified acoustical engineer to monitor vibration in the areas surrounding the oil field as determined necessary by the director or the director of public health. The monitoring shall be conducted unannounced and within a time frame specified by the director or the director of public health. Should vibration from the oil operations exceed the vibration thresholds specified in this section, no new drilling or redrilling permits shall be issued by the county until the operator in consultation with the director and director of public health identifies the source of the vibration and the operator takes the steps necessary to assure compliance with thresholds specified in this section. The results of all such monitoring shall be promptly posted on the oil field web site and provided to the CAP. A telephone number by which persons may contact the operator at all times to register complaints regarding oil operations shall be posted in the main entrance sign to the facility and included in the annual newsletter required by subsections J.2.b and on the oil field web site required by subsection J.2.c.	No exceedances of the vibration criteria specified in subsection E.6. of the CSD were reported to FM O&G by DPH.
127	F.7	Complaints. All complaints related to oil operations received by the operator shall be reported on the same business day to the environmental compliance coordinator and to the director. In addition, the operator shall maintain a written log of all complaints and provide that log to the director, the MACC, and CAP on a quarterly basis. Depending upon the nature of the complaint, the operator shall report the complaint to the SCAQMD, DOGGR, and any other appropriate agencies with oversight authority regarding the complaint at issue. If the complaint is received after normal business hours, it shall be reported to the environmental compliance coordinator and the agencies at the opening of the next business day.	All complaints received were reported to the ECC, DRP as well as other appropriate agencies with oversight of the matter in compliance with the timing of this policy. Quarterly complaint logs were submitted to the ECC and the DRP quarterly and are posted at <a href="http://www.inglewoodoilfield.com">www.inglewoodoilfield.com</a> .
128	G.1	Costs of Implementing Monitoring and Enforcing Conditions. The operator shall be fully responsible for all reasonable costs and expenses incurred by the county or any county contractors, consultants, or employees, in implementing, monitoring, or enforcing this section, including but not limited to, costs for permitting, permit condition implementation, mitigation monitoring, reviewing and verifying information contained in reports, undertaking studies, research and inspections, administrative support, and including the fully burdened cost of time spent by county employees on such matters.	FM O&G made timely payments on all CSD monitoring and enforcement costs to the County through the draw down account required by CSD Provision G.2. All costs from the implementation of the CSD, permit processing, mitigation monitoring, compliance report research, review and verification, inspections, and administrative costs were paid by FM O&G from this account.

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129	G.2	<p>Draw-Down Account. The operator shall maintain a draw-down account with the department of regional planning from which actual costs will be billed and deducted for the purpose of defraying the expenses involved in the county's review and verification of the information contained in any required reports and any other activities of the county, including but not limited to, enforcement, permitting, inspection, coordination of compliance monitoring, administrative support, technical studies, and the hiring of independent consultants. The initial amount to be deposited by the operator shall be \$500,000. In the first year, if withdrawals from the account have reduced its balance to less than 50 percent of the amount of the initial deposit (\$250,000), the operator shall deposit \$50,000 in supplemental funds within 30 business days of notification. After the first year, if the balance in the draw-down account is reduced at any time to \$50,000, the operator shall deposit \$50,000 in supplemental funds on each occasion that the account is reduced to \$50,000 or less within 30 business days of notification. There is no limit to the number of supplemental deposits that may be required. At the discretion of the operator, the amount of an initial or supplemental deposit may exceed the minimum amounts specified in this subsection. The director may, from time to time, increase the minimum \$50,000 figure to account for inflation or the county's experience in obtaining funds from the account.</p>	<p>The draw-down account has been maintained at or above the \$50,000 balance as required by this requirement. The only deposit to the account in 2016 occurred on 03/31/16.</p>
130	G.3	<p>Indemnification. The operator shall enter into an agreement with the county to indemnify and hold harmless the county, its elected and appointed officials, agents, officers, and employees from any claim, action, or proceeding for damages arising from its oil operations, including water, air or soil contamination, health impacts, or loss of property value during the oil operations, well abandonment, and post-abandonment activities with terms approved by, and in a form acceptable to, the CEO.</p>	<p>The required agreement was documented in a letter signed by the operator and the County dated November 12, 2009, the agreement is on file with the County.</p>
131	G.4	<p>Insurance Requirements. Within 90 days following the effective date of the ordinance creating this section or such later time as may be approved by the director for good cause shown, and without limiting the operator's indemnification of the county as required in the preceding subsection, the operator shall provide evidence of insurance coverage that meets county requirements as required and approved by the CEO including identifying the county and its elected and appointed officers and employees as additional insureds. Such coverage shall be maintained so long as oil operations are conducted within the district and until such time as all abandonment requirements are met and certified by the appropriate local, state, and federal agencies. Such insurance coverage shall include but is not necessarily limited to the following: general liability, auto liability, professional liability, and environmental impairment liability coverage insuring clean-up costs and endorsing for 'Sudden and Accidental contamination or pollution. Such coverage shall be in an amount sufficient to meet all applicable state and federal requirements, with no special limitations. At the operator's request and only with county approval by the CEO, the operator may self-insure all or any part of the above coverage obligations in lieu of purchasing commercial coverage. These insurance requirements shall be in addition to all other indemnification, insurance and performance security required by federal, state, and local regulations and permits.</p>	<p>PXP, the operator at the time of CSD adoption, provided the County with an insurance policy meeting the liability and environmental impairment liability requirements of this provision on January 18, 2010. FM O&amp;G updated this insurance to reflect the change in operator on June 25, 2013. SPR is currently in the process of updating this insurance to reflect the change in operator.</p>
132	G.5.a	<p>Performance Bond. Prior to issuance of the first drilling or redrilling permit pursuant to this section, the operator shall provide to the department of regional planning a faithful performance bond or financial instrument in the sum to be determined by the CEO, payable to the county and executed by a corporate surety acceptable to the county and licensed to transact business as a surety in the state of California. Such bond shall be conditioned upon the faithful performance by the operator of duties related to well abandonment, site restoration, and environmental cleanup and shall be in a format and include terms approved by the CEO.</p>	<p>PXP, the operator at the time of CSD adoption, provided the County with a performance bond issued by an acceptable corporate surety licensed to transact business in the state of California on September 29, 2009. FM O&amp;G updated this bond to reflect the change of operator on June 25, 2013. SPR is currently in the process of updating this insurance to reflect the change in operator.</p>
133	G.5.b	<p>Change of Operator. The performance bond shall continue in force for one year following any sale, transfer, assignment, or other change of operator of the oil field, or of the current operator's termination of activities at the oil field. The county may release said bond prior to the end of the one-year period upon satisfaction by the operator of all its obligations. Notwithstanding the foregoing, the performance bond shall not be terminated or released upon the sale, transfer, assignment, or other change of operator until the new operator has delivered a replacement bond complying with the provisions of this subsection G.</p>	<p>On DATE, the Operator of the Inglewood Oil Field changed from FM O&amp;G to SPR, and SPR is currently in the process of updating this bond to reflect the change in operator.</p>

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134	G.5.c	Funding Options. At its sole option, the county may accept certificates of deposit, cash deposits, or U.S. government securities in lieu of commercial bonds to meet the above bonding requirements on terms approved by the CEO.	This provision is not applicable since FM O&G, now SPR, has provided a performance bond in accordance with G.5.a.
135	G.6	Other Obligations. The insurance, indemnification, and performance security requirements in subsections G.3, G.4, and G.5 shall be in addition to all other indemnification, insurance, and performance security required by federal, state and local regulations, and permits.	The condition is administrative in its intent and is fully implemented.
136	G.7	<p>Periodic Review. The county shall conduct a comprehensive review of the provisions of this section at least every five years to determine if the provisions of this section are adequately protecting the health, safety, and general welfare. Such reviews shall, among other things, consider whether additional provisions should be added, appended, or removed. One of the main goals of the periodic review shall be to evaluate if proven technological advances that would further reduce impacts of oil operations on neighboring land uses should be incorporated into the provisions of this section.</p> <p>a. Review Requirements. Each review shall include a report by a hearing officer designated by the director, which shall be prepared after public notice and an opportunity for public comment. The report shall include a comprehensive analysis of the effectiveness of this section, and shall review and consider enforcement activity, operational records, and any other issues relating to oil operations. The report, at the option of the county, may include a survey of residents near the oil field regarding noise, odors, vibrations, and other issues requested by the director of public health. A draft of the report shall be provided to the CAP and the operator for review and comment. All comments on the draft report from the CAP and the operator shall be submitted to the hearing officer in writing, and will be considered, if timely received, before the report is finalized. The final report by the hearing officer shall include a recommendation as to whether the director should prepare proposed amendment to this section for submission to the board of supervisors.</p> <p>b. Early Reviews. At the discretion of the director, reviews of this section may be conducted more frequently than every five years. Without limiting such discretion, the director shall consider whether an early review should be undertaken if more than three material violations occur within any 12-month period.</p> <p>c. Initial Review. The initial review shall occur no sooner than three years and no later than five years after the effective date of the ordinance establishing this section unless the director determines that such initial annual review shall occur at an earlier time pursuant to subsection b, above.</p>	<p>The County released a five year review report in February 2014. The draft report was circulated for review and comment to both the CAP, members of the public, other agencies and the operator. Comments on the draft report were considered in the preparation of the administrative final draft released on 06/25/15. The administrative final draft was discussed at the July 2015 CAP meeting, and on 09/24/15, the final draft was issued. The report was prepared consistent with the five year time frame requirement stipulated in CSD Provision G.7.c. On 10/28/15, the County issued a letter to FM O&amp;G verifying that the Periodic Review Final Report dated September 2015 concluded that the provisions of the CSD have been effective and that no modification to the current language of the CSD is recommended. The report, however, identified ten recommendations to strengthen implementation procedures of the CSD. Eight of the ten recommendations were FM O&amp;G's responsibility to implement, now SPR's, and compliance with each recommendation is discussed in the related CSD section row within this document.</p>
137	G.8	<p>Multiple Agency Coordination Committee ("MACC"). A MACC shall be established to coordinate activities and communications between the various agencies with regulatory authority over the oil operations within the district. While each agency will continue to make its own decisions with regard to their respective areas of authority, the MACC will allow for collection and analysis of data and for discussion of both strategic evaluations and enforcement actions taken by the various agencies at the oil field.</p> <p>a. MACC Members. The director shall establish a MACC that includes representatives from the following agencies: the county department of regional planning, the county fire department, the county department of public works, and the county department of public health. The SCAQMD, the Regional Water Quality Control Board, DOGGR, and Culver City fire department shall be invited to appoint a representative from their agency as a member of the MACC.</p> <p>b. MACC Chair. The director or his designee shall chair the MACC meetings and shall coordinate all MACC activities including scheduling and keeping minutes of MACC meetings.</p> <p>c. MACC Meetings. The MACC shall determine its meeting schedule.</p> <p>d. Documents Provided to the MACC. Copies of all monitoring and compliance reports, plans, and other documents that are requirements of this section shall be submitted to the MACC.</p>	<p>A MACC was established in 2009, and the MACC conducts periodic meetings. All monitoring and compliance reports are provided to the MACC.</p>

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138	G.9	Related County Code Provisions. The county code contains a number of provisions related to oil wells and oil field operations. Where the regulations of this section differ from any other provisions in the county code, these regulations shall supersede unless the contrary provisions are mandated by state law.	The provision is a standard County requirement to clarify jurisdiction on similar code and regulations.																																	
139	H.1 SA 4	H.1: Director's Review Required. The operator shall apply for and receive approval of a director's review pursuant to the provisions of Part 12 of Chapter 22.56 prior to any new drilling and redrilling. New drilling and redrilling approved through a director's review procedure shall be limited to no more than 53 wells per year, with the maximum number of newly drilled wells of that total, limited to 45 per year, except that during the first year following the effective date of the ordinance establishing this section, new drilling and redrilling shall be limited to no more than 24 wells. Approval through director's review for drilling new wells shall be limited to 600 wells over 20 years, beginning on the effective date of this ordinance. Drilling and redrilling shall be planned to avoid over concentration of such activities in one area in any one year, if near developed areas. The director's review procedures shall also apply to emergency actions determined by the director as necessary to prevent an imminent hazard, or to other immediate measures required for the purposes of protecting health and safety. No new permits for drilling or redrilling shall be approved by the director unless the subject wells have been approved as part of an annual drilling plan as described in subsection E.26.c. Approval shall not be granted until copies of all related permits have been submitted to the director; other permits include, but are not limited to, the permits required by DOGGR, the county fire department; the county department of public works, the county sanitation district, RWQCB, SCAQMD, and other pertinent agencies identified by the director.	While no drilling or redrilling occurred in 2016, some wells approved in the 2016 Drilling Plan received DRP Site Plan approvals and included proof of applicable permits from DOGGR and/or the LA County Fire Department.																																	
140	H.1 SA 4	SA 4: Number of wells. Notwithstanding the aggregate and annual well-drilling limits in the CSD, PXP shall comply with the following limits: a. Notwithstanding Section 22.44.142.H of the CSD, no more than 500 new wells (inclusive of Bonus Wells and wells drilled since approval of CSD) shall be drilled pursuant to the CSD (hereinafter "Director's Review") through October 1, 2028, or during the remaining life of the CSD, whichever is later. b. Until such time as PXP has drilled or redrilled 50 wells since the adoption of the CSD, or 24 months from the date of this Agreement, whichever is sooner ("Time Period One"), no more than 30 wells may be drilled or re-drilled in any calendar year pursuant to a Director's Review as set forth in the CSD (hereinafter Director's Review). At the end of Time Period One, and if the County determines, pursuant to its review of the CSD by the Director of Regional Planning, that the CSD has been effective in protecting the health, safety, and general welfare of the public, thereafter (the "Full Operational Period") no more than 35 wells may be drilled or re-drilled in the calendar year pursuant to Director's Review. c. In Time Period One, for each well abandoned within 800 feet of any Developed Area (the "800-foot zone") by PXP since adoption of the CSD and in full compliance with the California Department of Conservation's Division of Oil, Gas and Geothermal Resources ("DOGGR") standards for abandonment at the time of abandonment, PXP may drill two additional new wells outside of the 800-foot zone (hereinafter "Bonus Wells"), up to a maximum of 45 drilled and redrilled wells (30 wells plus 15 Bonus Wells) in any calendar year within Time Period One pursuant to Director's Review and subject to review and approval in the Annual Drilling Plan. Subject to the annual and aggregate limits on number of wells, Bonus Wells earned by abandonment may be drilled at any time during the life of the CSD. d. In the Full Operational Period, for each well abandoned within the 800-foot zone, PXP may drill two additional new wells outside the 800-foot zone up to a maximum of 53 drilled and re-drilled wells (35 wells plus 18 Bonus Wells) in that year pursuant to Director's Review and subject to review and approval in the Annual Drilling Plan. Subject to the aggregate and annual limits on number of wells, Bonus Wells earned by abandonment may be drilled at any time during the life of the CSD. e. The Developed Area as used in the CSD with respect to the 400-foot buffer zone (Section 22.44.142.E.) shall remain unchanged (static or fixed) from what it was determined to be on the effective date of the CSD.	<p>Since inception of the CSD and following the installation of 50 new wells, the Settlement Agreement allowed FM O&amp;G, and now SPR, to apply to the County for approval to install up to 35 new wells per year. FM O&amp;G's predecessor applied for this well increase on October 10, 2011 and was granted approval by the County on December 12, 2011.</p> <p>Since inception of the CSD through June 30, 2014, 127 wells have been drilled and 32 wells have been abandoned; of which 20 were within 800 feet of Developed Areas.</p> <table border="1" data-bbox="1806 1104 2618 1437"> <thead> <tr> <th colspan="3">Number of Wells Drilled Since Inception of the CSD</th> </tr> <tr> <th>YEAR</th> <th>NUMBER OF WELLS</th> <th>BONUS WELLS USED</th> </tr> </thead> <tbody> <tr> <td>2009</td> <td>0</td> <td>0</td> </tr> <tr> <td>2010</td> <td>19</td> <td>0</td> </tr> <tr> <td>2011</td> <td>40</td> <td>5</td> </tr> <tr> <td>2012</td> <td>20</td> <td>0</td> </tr> <tr> <td>2013</td> <td>30</td> <td>0</td> </tr> <tr> <td>2014</td> <td>18</td> <td>0</td> </tr> <tr> <td>2015</td> <td>0</td> <td>0</td> </tr> <tr> <td>2016</td> <td>0</td> <td>0</td> </tr> <tr> <td><b>Total</b></td> <td><b>127</b></td> <td><b>5</b></td> </tr> </tbody> </table>	Number of Wells Drilled Since Inception of the CSD			YEAR	NUMBER OF WELLS	BONUS WELLS USED	2009	0	0	2010	19	0	2011	40	5	2012	20	0	2013	30	0	2014	18	0	2015	0	0	2016	0	0	<b>Total</b>	<b>127</b>	<b>5</b>
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141	H.2 - 3	<p>H.2: Conditional Use Permit Required. Provided a conditional use permit has first been obtained as provided in Part 1 of Chapter 22.56, and while such permit is in full force and effect in conformity with the conditions of such permit, the following uses may be established:</p> <ul style="list-style-type: none"> <li>a. Drilling or redrilling that exceeds the maximum number allowed pursuant to a director's Review;</li> <li>b. Steam drive plant; and</li> <li>c. New tanks with a capacity of greater than 5,000 barrels.</li> </ul> <p>H.3: Conditional Use Permit Requirements. For those uses requiring a conditional use permit, in addition to the requirements of Part 1 of Chapter 22.56, the applicant shall substantiate to the satisfaction of the hearing officer that:</p> <ul style="list-style-type: none"> <li>a. The requested use is in compliance with the provisions of this section; and</li> <li>b. All reasonable measures were taken to reduce and minimize potential impacts from the proposed operation.</li> </ul>	No conditional use permits have been applied for/obtained.
142	H.4	Application Where Violation Exists. No application required pursuant to this section shall be accepted for processing or approved where any existing use in the district is being maintained or operated by the operator or its agents in violation of any material provision of this title.	No violations were issued in 2016.
143	I.1	<p>Civil Penalties and Performance Security. The operator shall be subject to a penalty for violation of any requirement of this section as determined by, and at the discretion of, the director in an amount not less than \$1,000 or more than \$1 0,000 per day per violation, but in no event, in an amount beyond that authorized by state law. For this purpose, the operator shall deposit the sum of \$100,000 in an interest-bearing trust fund with the department of regional planning within 30 days following the effective date of this section, to establish a draw-down account. A written notice of violation and the associated penalty will be sent to the operator in the event of a violation. If the noted violation is not corrected to the satisfaction of the director within the time period set forth in the notice of violation, the penalty amount cited in the notice of violation will be deducted from the account. If the violation is corrected within the time period set forth in the notice of violation, but recurs any time within a six-month period, the penalty will be deducted from the account upon each recurrence and the operator will be notified of such deduction. Once the deposit has been depleted by 50 percent of the initial amount (\$50,000), the operator shall deposit additional funds sufficient to bring the balance up to the amount of the initial deposit (\$1 00,000) within 10 business days of notification. There is no limit to the number of supplemental deposits that may be required while the operator conducts oil operations within the district. If the operator is dissatisfied with the action of the director, the operator may file an appeal with the hearing officer within 15 days after the date which notice is mailed. Upon receiving a notice of appeal, the hearing officer shall take one of the following actions.</p> <ul style="list-style-type: none"> <li>a. Affirm the action of the director;</li> <li>b. Refer the matter back to the director for further review with or without instructions; or</li> <li>c. Set the matter for public hearing and after hearing, affirm, modify, or reverse the action of the director.</li> </ul> <p>The decision of the hearing officer shall be final.</p>	On 12/23/08, \$100,000 was deposited with the County in the interest-bearing trust fund required by this provision. FM O&G was not subject to any fees described in this provision; hence, the balance of this account has not changed with the exception of interest accumulation. This account has been transferred to Sentinel Peak Resources.
144	I.2	Access to Records and Facilities. As to any condition which requires for its effective enforcement the inspection of records or facilities by the county or its agents, the operator shall make such records available or provide access to such facilities upon reasonable notice from the county. The county agrees to keep such information confidential where required or permitted by law and requested by the operator in writing.	FM O&G has made records and facilities available for inspection by the County and its agents. SPR will continue to do so.

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145	I.3	Right of Entry. Any officer or employee of the county of Los Angeles, or his or her duly appointed representative, whose duties require the inspection of the oil field premises shall have the right and privilege at all reasonable times, to enter upon any premises upon or from which any oil operations are being conducted for which any permit is required under this section, for the purpose of making any of the inspections pursuant to this section, or in any other ordinance of the county, or for any other lawful purpose, but for safety reasons, shall be accompanied by the operator or a designee of the operator and shall wear all appropriate personal protection equipment in accordance with the operator's established health and safety policies.	FM O&G has made the oil field open to inspection. SPR will continue to do so.
146	J.1	Community Advisory Panel ("CAP"). A community advisory panel shall be established by the director to foster communication about ongoing operations at the oil field and to allow the community representatives to provide input to the county and the operator. a. CAP Members. The CAP may include representatives of the county, the city of Los Angeles, the city of Culver City, West Los Angeles College, the operator, the landowners, and each of the major neighborhoods surrounding the oil field (including Ladera Heights, Windsor Hills, Oak Park, View Park, Culver Crest, Blair Hills, and Raintree). The operator and each of the governmental entities previously referred to may each designate a representative to the CAP. Each landowner and neighborhood organization of the surrounding communities may submit a nomination to the director for appointment to the CAP. Where there is no neighborhood organization, a community resident may make a request to the director to be appointed to the CAP. School districts with schools in the vicinity of the oil field and the lessors may make a request to the director to have a representative appointed to the CAP. b. CAP Meetings. The CAP shall determine its meeting schedule. c. Documents Provided to the CAP. A notice of availability of all monitoring and compliance reports and results, all plans, audits and studies, and any other available documents that are required by this section shall be submitted to the CAP promptly after they are prepared or otherwise available. Copies of these reports, documents, and other items shall be provided to CAP members upon request except to the extent information therein may not be legally disclosed. Prior to each CAP meeting, the county shall provide to the CAP a list of all violations of the provisions of this section that have occurred since the last CAP meeting.	Documentation made available to the CAP is posted on the Inglewood Oil Field website required/described in J.2.c.
147	J.2.a G.7 (2015)	J.2.a: Community Meetings. The operator shall hold community meetings on an annual basis to provide updates on oil operations. G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "agendas for future Community Meetings be specific to oil field operations and issues and that measures be implemented to ensure questions from the public are addressed appropriately.	The 2016 annual meeting was held on 11/15/2016, and in accordance with the G.7 (2015) recommendation, the agenda was specific to oil field operations and FM O&G ensured that questions from the public were addressed appropriately.
148	J.2.b	Newsletter. The Operator shall publish an informational newsletter annually, which shall contain updated information on oil operations including drilling, redrilling, maintenance, repair, and reworking activities and all recently granted conditional use permits or applications filed for conditional use permits for the oil field. The newsletter shall be mailed by the operator to all owners of property located within 1,000 feet of the outer boundary line; all owners of property within 1,000 feet of the perimeter of the district as shown in the records of the county assessor's office; to any person or entity who has filed a written request therefore with the director; and to neighboring cities. The operator shall also make these newsletters available on the oil field web site. The oil field web site address shall be publicized in each newsletter.	The seventh edition of the newsletter was mailed out and posted on 10/15/16.

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149	J.2.c	Oil Field Web Site. The operator shall maintain and update on a regular basis an oil field web site that shall include information on oil operations at the oil field, including drilling and production activities. All monitoring and compliance reports and results, plans, audits and studies, and any other available documents that are required by this section (except to the extent they contain information that may not legally be disclosed) shall be promptly posted on the Oil Field Web Site in pdf format.	SPR now maintains the www.inglewoodoilfield.com website, which includes information on the history and future of the oil field, oil field operations, operational plans, compliance plans, community and environmental sections, and information on the CSD. The web site contains over 100 documents related to operational and compliance information with the documentation posted in pdf format as required by this policy. The web site also provides contact information and includes an interactive email system to allow for direct input to SPR and for registering for email updates on oil field activities.
150	J.3	Ombudsperson. The operator shall designate employees or authorized agents to serve as ombudspersons to respond to questions and concerns concerning the oil operations. Each ombudsperson shall be familiar with all the provisions of this section and all conditions of approval related to permits and approvals issued by the county or the State of California. It shall be the further responsibility of the ombudsperson to facilitate, to the extent feasible, the prompt resolution of any issues that may arise relating to the above-stated matters or the impacts of the oil operations. The name, title, email address, and telephone number of the ombudsperson shall be posted on the oil field web site, prominently displayed in the newsletter, distributed twice per year to the CAP and MACC, and provided to any other persons requesting such information. An ombudsperson shall be available at all times, and shall respond within one hour after an initial call. An ombudsperson shall also meet at reasonable times with interested parties in an attempt to resolve issues related to oil operations. An ombudsperson shall have authority to initiate a response on behalf of the operator in all foreseeable matters. The operator shall be required to maintain a written log of all calls to the ombudspersons registering complaints or concerns regarding oil operations or other matters. The log shall include the complainant's name, date, time, phone number, nature of complaint, and the response or resolution offered. A copy of the log shall be provided to the director, the MACC, and the CAP on a quarterly basis.	The ombudsperson system has been in place since the adoption of the CSD and serves as primary contact between SPR and the community. The ombudsperson contact information is included in the annual newsletters and in the agendas for CAP meetings. In addition to the ombudsperson, the oil field maintains four staff members on an on-call basis to coordinate and respond to calls from the public or regulatory agencies regarding oil field operations. FM O&G maintained a complaint log summarizing all calls made to the ombudsperson as required by this policy, and SPR will continue to do the same moving forward.
151	Section K	Modification of Development Standards.	No modifications to development standards has been applied for.
152	Section L	Implementation Provisions. This subsection identifies the various implementation plans and other requirements for initial compliance with this CSD and the time frames therefor. Except as identified below, the provisions of this section shall be complied with on the effective date of the ordinance establishing this CSD. As used in this subsection, "effective date" shall mean 30 days after the board of supervisors adopts the ordinance establishing this CSD. As soon as possible after the effective date, the department of regional planning shall develop an overall implementation plan specifying the required contents or measures for each of the plans set forth below, including the inclusion of those appropriate mitigation measures indicated as necessary by the Final Environmental Impact Report for the Baldwin Hills Community Standards District to reduce environmental impacts to less than significant levels in cases where impacts can be so reduced.	This subsection of the CSD lists the various implementation plans and other stipulations required for initial compliance along with a submittal schedule for the subject compliance. The schedule requirements for the plan and compliance submittals required under this provision range from 30 days to two years following the effective date of the CSD (October 28, 2008). All plans and initial requirements of this CSD subsection were completed; therefore, this requirement is no longer applicable.

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153	SA 5	Health Assessment and Environmental Justice Study. The County shall complete a Community Health Assessment of the communities surrounding the Oil Field which shall include an Environmental Justice component by June 2012 and ensure additional assessments are completed every five to seven years throughout the life of the CSD. In future Community Health Assessments, the County Department of Public Health ("Public Health") shall review other agencies' reports regarding air quality, water quality and seismic data, where feasible, in its assessment. Public Health will analyze the information by socio-economic and demographic data to accommodate and reflect an Environmental Justice component. The Community Health Assessment shall include, but not be limited to, an analysis of cancer rates, mortality rates, birth outcomes and a survey of other pertinent health indicators. The County will consult with the CAP and the Health Working Group regarding the Community Health Assessment and consider reasonable comments by the CAP and the Health Working Group. Public Health will comply with all applicable state and federal requirements including Title VI of the Civil Rights Act of 1964 and corresponding regulations, and California Government Code Section 11135 and corresponding regulations.	This is a County action that was completed in July 2012.
154	SA 7	Electrical Distribution Study. The County will propose to Southern California Edison ("SCE") and the Los Angeles Department of Water and Power ("DWP") that a study be conducted in cooperation with SCE, DWP, the County and PXP regarding opportunities to streamline and consolidate electrical lines distributed throughout the Oil Field and that SCE and DWP each fund one-fourth of the cost of such study. PXP will fund one fourth of the cost of any such study. The County will fund one-fourth of the cost of any such study.	This is a County action, and it was reported that both SCE and DWP declined to participate with respect to funding the study.
155	SA 8	Air Quality Monitoring. Supplemental to the air monitoring required by the CSD, the County will develop and implement an air quality monitoring plan that takes into consideration review and comments from Petitioners, interested stakeholders and the public. Such air monitoring shall be designed to assess the risk of both acute and chronic exposure to air contaminants from Oil Field operations, and endeavor to determine and distinguish the source of emissions, to the extent feasible, using available and affordable monitoring technology. Such air monitoring may be performed by SCAQMD, or an independent qualified consultant selected by County, and shall be commenced within 12 months of the date of this Agreement. The protocol for the air monitoring plan shall be peer reviewed prior to commencement. The plan shall be completed, and a peer reviewed report issued, within 12 to 24 months after commencement. The County commits to spending up to \$250,000 of its own funds toward implementing the plan and shall use reasonable efforts to seek additional funding sources, if necessary, to implement the plan. PXP shall reasonably cooperate with SCAQMD, the County and/or the independent consultant regarding any and all air monitoring related to the Oil Field.	This is a County action that was completed in February 2015.
156	SA 9	Back-Up Flare. The CSD (County Code section 22.44.142.L.5.b) allows PXP to maintain its existing gas plant flare as back-up equipment at the facility's gas plant after a new flare is permitted and installed. PXP and the County agree that this provision of the CSD allows only one gas plant flare to be operated at one time at the Oil Field. PXP shall comply with said limitation of only one gas plant flare operating at one time at the Oil Field. PXP shall install and have operational the new flare within 180 days of receiving the SCAQMD permit or at such later date as approved by the Director of Regional Planning for good cause shown.	Installation of the new gas plant back-up flare was completed in 2012. The old gas plant flare remains and is maintained as a back up equipment as allowed for by CSD Provision L.5.b and the Settlement Agreement. FM O&G has complied with the requirement that only one flare be in operation at one time at the oil field. SPR will continue to do so.
157	SA 10	Well Plugs. DOGGR requires oil field operators to utilize a minimum 25-foot cement surface plug at the top of a well when abandoning any such well pursuant to Title 14 of the California Code of Regulations section 1723.5. To augment this requirement, for all wells abandoned at the Oil Field from the date of this Agreement, PXP shall utilize a total of 150-foot cement surface plug.	SPR complies with the 150 foot cement plug requirement for abandoned wells.



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158	SA 13	<p>Fracking Study. PXP shall pay for an independent consultant to conduct a study of the feasibility and potential impacts (including impacts to groundwater and subsidence) of the types of fracturing operations PXP may conduct in the Oil Field. The study will also consider PXP' s historic and current use of gravel packing. Such study will be completed within twelve (12) months of the date of this Agreement. Such study and all the back-up information for such study shall be provided to a qualified peer reviewer selected by the County and PXP, who shall review the study, back-up materials, and conclusions for completeness and accuracy. PXP must provide the independent expert with all materials requested and reasonably necessary for an accurate and verifiable study. The peer reviewer will be provided with access to all the data and materials provided to the independent expert. The peer reviewer shall agree to keep all proprietary information confidential. If the peer reviewer determines that the study is materially inadequate, incomplete or inaccurate, it shall so advise PXP's consultant who will complete the study as reasonably recommended by the peer reviewer and provide the revised study to the peer reviewer within 90 days. Upon acceptance by the peer reviewer, the study and all supporting material, including comments by the peer reviewer, shall be forwarded to the County, DOGGR, the Regional Water Quality Control Board ("R WQCB "), CAP and Petitioners and be available to the public, with any proprietary information redacted.</p>	<p>The Hydraulic Fracturing Study – Inglewood Oil Field was completed in July 2012 with the final report dated October 10, 2012 consistent with the requirements of the Settlement Agreement. The report is available to the public on the Inglewood Oil Field web site.</p>
159	SA 15	<p>CSD Provisions. The CSD and all of its standards and requirements remain in full force and effect except to the extent that PXP has agreed to be limited by stricter or more rigorous controls or standards as reflected in this Agreement. Nothing herein shall limit or abrogate the County's discretion in amending the CSD, or other action pursuant to the County's legislative or police powers, to impose more restrictive requirements. This Agreement neither establishes nor abrogates any vested rights to drill new wells in the Oil Field. The County will provide written guidance on the additional limits and controls regarding operation of the Oil Field which are required by this Agreement to County staff and departments responsible for implementing the CSD and enforcing the CSD, and any other personnel the County deems necessary. The County shall recirculate this written guidance on an annual basis.</p>	<p>The requirements of the CSD and the Settlement Agreement remain in full effect. The County released the written guidance required by this provision via the Periodic Review report as described in CSD provision G.7 and a Settlement Agreement 2016 Compliance Report dated 11/16/16.</p>



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1	E.1.a G.7 (2015)	E.1.a: Community Alert Notification System ("CAN"). The operator shall maintain and test on an annual basis a CAN for automatic notification of area residences and businesses in the event of an emergency arising at the oil field that could require residents or inhabitants to take shelter, evacuate, or take other protective actions. G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "the E.1.a annual Community Alert Notification (CAN) tests include interested residents."	The CAN is maintained and was tested on 12/27/17. Interested residents were included in this test pursuant to the G.7/Final 2015 Periodic Review Final Report recommendation on this provision.
2	E.1.b	Spill Containment Response Training. The operator shall conduct annual spill containment response training and shall at all times have available, on-site, sufficient and properly maintained equipment and/or facilities so that a spill of the entire contents from the largest oil tank on the oil field can be responded to and contained in a timely manner to reduce the likelihood that the spill reaches a catch basin.	The annual spill containment response training occurred on 06/19/17.
3	E.1.c	Emergency Response Plan ("ERP"). The operator shall at all times maintain and fully implement and comply with all provisions of an emergency response plan and shall further ensure that the then current ERP satisfies all rules and regulations of the United States Environmental Protection Agency and California Code of Regulations relating to emergency action plans and spill prevention control and countermeasure plans, as well as the rules, regulations, and requirements of the California Office of Spill Prevention and Response. The ERP shall also satisfy the rules and regulations of the United States Department of Transportation relating to onshore pipeline spills.	SPR maintains, fully implements and complies with an ERP that is in compliance with all applicable rules and regulations of agencies with oversight of the ERP.
4	E.2.a	Emission Offsets. The operator shall obtain emission offsets or RECLAIM credits as defined and required by SCAQMD Regulations for all new or modified emission sources that require a new or modified SCAQMD permit.	No credits were needed in 2017.
5	E.2.c	Odor Minimization. At all times the operator shall comply with the provisions of an odor minimization plan that has been approved by the director. The odor minimization plan shall include any measures requested by the director. The plan shall provide detailed information about the facility and shall address all issues relating to odors from oil operations. Matters addressed within the plan shall include setbacks, signs with contact information, logs of odor complaints, method of controlling odors such as flaring and odor suppressants, and the protocol for handling odor complaints. The odor minimization plan shall be reviewed by the operator on an annual basis to determine if modifications to the plan are required. Any modifications to the odor minimization plan shall be submitted to the director for review and approval.	The Odor Minimization Plan was reviewed by SPR on 12/22/17 and it was determined that no modifications are required.
6	E.2.d.	Air Monitoring Plan. At all times the operator shall comply with the provisions of an air monitoring plan that has been approved by the director. The air monitoring plan shall include any measure requested by the director. During drilling, redrilling, and reworking operations, the operator shall monitor for hydrogen sulfide and total hydrocarbon vapors as specified in the approved plan. Total hydrocarbon vapors shall be monitored at the gas plant as specified in the approved plan. Such monitors shall provide automatic alarms that are triggered by the detection of hydrogen sulfide or total hydrocarbon vapors. For drilling, redrilling, or reworking monitors, the alarms shall be audible and/or visible to the person operating the drilling, redrilling, or reworking equipment. For the gas plant monitors, the alarms shall be audible or visible to the gas plant operator. Actions to be taken shall be as follows when specified alarm levels are reached:	SPR complied with the provisions of the approved Air Monitoring Plan. Compliance was monitored by County Environmental Compliance Coordinator (ECC) site visits.



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7	E.2.d.i - iv	<p>i. At a hydrogen sulfide concentration of equal to or greater than five parts per million but less than 10 parts per million, the operator shall immediately investigate the source of the hydrogen sulfide emissions and take prompt corrective action to eliminate the source. The corrective action taken shall be documented in the drilling, redrilling, or reworking log. If the concentration is not reduced to less than five parts per million within four hours of the first occurrence of such concentration, the operator shall shut down the drilling, redrilling, or reworking operations in a safe and controlled manner, until the source of the hydrogen sulfide emissions has been eliminated, unless shutdown creates a health and safety hazard.</p> <p>ii. At a hydrogen sulfide concentration equal to or greater than 10 parts per million, the operator shall promptly shut down the drilling, redrilling, or reworking operations in a safe and controlled manner until the source of the hydrogen sulfide emissions has been eliminated, unless shutdown creates a health and safety hazard. The corrective action taken shall be documented in the drilling, redrilling, or reworking log. When an alarm is received, the operator shall promptly notify the county fire department- Health Hazardous Materials Division, the Culver City Fire Department, the Office of Emergency Services, and the SCAQMD.</p> <p>iii. At a total hydrocarbon concentration equal to or greater than 500 parts per million but less than 1,000 parts per million, the operator shall immediately investigate the source of the hydrocarbon emissions and take prompt corrective action to eliminate the source. The corrective action taken shall be documented in the drilling log for drilling, redrilling, or reworking and in the gas plant log for the gas plant. If the concentration is not reduced to less than 500 parts per million within four hours of the first occurrence of such concentration, the operator shall shut down the drilling, redrilling, reworking, or gas plant operations in a safe and controlled manner, until the source of the hydrocarbon emissions has been eliminated, unless shutdown creates a health and safety hazard.</p> <p>v. At a total hydrocarbon concentration equal to or greater than 1,000 parts per million, the operator shall promptly shut down the drilling, redrilling, or reworking or gas plant operations in a safe and controlled manner, until the source of the hydrocarbon emissions has been eliminated, unless shutdown creates a health and safety hazard. The corrective action taken shall be documented in the drilling log for drilling, redrilling, or reworking and in the gas plant log for the gas plant. When an alarm is received, the operator shall promptly notify the county fire department- Health Hazardous Materials Division, the Culver City Fire Department, and the SCAQMD.</p>	<p>In 2017, no notifications to The County or City of Culver City Fire Departments or AQMD were required.</p>
8	E.2.d.v	<p>All the monitoring equipment shall keep a record of the levels of total hydrocarbons and hydrogen sulfide detected at each of the monitors, which shall be retained for at least five years. The operator shall, on a quarterly basis, provide a summary of all monitoring events where the hydrogen sulfide concentration was at five parts per million or higher and the total hydrocarbon concentration was at 500 parts per million or higher to the fire chief. At the request of the fire chief, the operator shall make available the retained records from the monitoring equipment.</p>	<p>In 2017, SPR provided the Fire Chief with quarterly reports, all of which reported zero (0) events during the respective quarter, on 4/3/17, 7/7/17, 10/7/17 and 1/15/18.</p>
9	E.2.e	<p>Portable Flare for Drilling. The operator shall have a gas buster and a portable flare, approved by the SCAQMD, at the oil field and available for immediate use to remove any gas encountered during drilling operations from drilling muds prior to the muds being sent to the shaker table, and to direct such gas to the portable flare for combustion. The portable flare shall record the volume of gas that is burned in the flare. The volume of gas burned in the flare shall be documented in the drilling log. The operator shall notify the fire chief and the SCAQMD within 48 hours in the event a measurable amount of gas is burned by the flare, and shall specify the volume of gas that was burned in the flare. No drilling or redrilling shall be conducted in areas that are known to penetrate the Nodular Shale zone unless a fully operational and properly maintained gas buster and portable flare are installed on the rig. All other drilling and redrilling operations shall be conducted so that any measurable gas that is encountered can, and will, be retained in the wellbore until the gas buster and portable flare are installed on the rig, after which the gas will be run through the system. The operator shall immediately notify the fire chief and the SCAQMD in the event any gas from drilling or redrilling operations is released into the atmosphere without being directed to and burned in the flare.</p>	<p>No notifications to the Fire Chief or AQMD were required In 2017.</p>



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10	E.2.f	Oil Tank Pressure Monitoring and Venting. All oil tanks that contain or could contain oil shall have a fully operational pressure monitoring system that continuously measures and digitally records the pressure in the vapor space of each tank. The detection system shall notify the operator via an alarm when the pressure in the tank gets within 10 percent of the tank relief pressure. In the event of an alarm, the operator shall immediately take corrective action to reduce the tank pressure. The corrective action shall be documented in the operator's log. The operator shall notify the fire chief and the SCAQMD within 24 hours if the pressure in any tank covered by this subsection ever exceeds such tank's relief pressure. Within seven calendar days after any tank vapor release, the operator shall report the incident to the SCAQMD as a breakdown event pursuant to Rule 430, and shall provide the fire chief with a written report of the event and the corrective measures undertaken and to be undertaken to avoid future oil tank vapor releases. The operator shall make any changes to such report that may be required to obtain approval from the fire chief and the SCAQMD, and shall promptly institute all corrective measures called for by the report.	No alarms requiring notification occurred in 2017; hence no notifications to the Fire Chief or the SCAQMD were necessary.
11	E.2.g	Odor Suppressant for Bioremediation Farms. When loading material or tilling material at the bioremediation farms, the operator shall use an odor suppressant such that no odor from the bioremediation farms can be detected at the outer boundary line.	The biofarms were not operated in 2017.
12	E.2.h	Odor Suppressant for Drilling and Redrilling Operations. The operator shall use an odor suppressant spray system on the mud shaker tables for all drilling and redrilling operations to ensure that no odors from said operations can be detected at the outer boundary line.	No drilling or redrilling activities occurred in 2017.
13	E.2.i	Closed Systems. The operator shall ensure all produced water and oil associated with production, processing, and storage, except those used for sampling only, are contained within closed systems at all times.	Closed systems were in place for all produced water and oil associated with production, processing and storage, except those used for sampling only.
14	E.2.j	Meteorological Station. The operator shall maintain and operate a meteorological station at the oil field in good operating condition and in compliance with all applicable Environmental Protection Agency ("EPA") and SCAQMD rules, regulations, and guidelines, and to the satisfaction of the director. The operator shall conduct an audit of the meteorological station on an annual basis and submit the results of the audit to the SCAQMD and the director. The operator shall maintain the data files for the meteorological station for a period of not less than 10 years. All such data shall be available upon request to the SCAQMD and the director.	SPR maintains and operates a meteorological station at the field in compliance with this policy. The 2016 annual audit of the station was submitted to the County on 07/31/17 and the 2017 annual audit is projected to be submitted in the spring or summer of 2018. SPR maintains data files for the station from CSD inception to present.
15	E.2.k	Updated Health Risk Assessment. After every five years of operation of the meteorological station, the operator shall provide the previous five years of meteorological data to the SCAQMD and the director. If the SCAQMD or the director determines that the previous five years of meteorological data from the oil field could result in significant changes to the health risk assessment that was conducted as part of the Baldwin Hills Community Standards District Environmental Impact Report, then the county may elect to re-run the health risk assessment using the previous five years of meteorological data from the meteorological station.	The first five years of data was submitted to the SCAQMD and the Director on 12/2/15. The next five years of data is due in 2020.
16	E.2.l	Off-Road Diesel Construction Equipment Engines. All off-road diesel construction equipment shall comply with the following provisions:  i. Utilize California Air Resources Board ("CARB") EPA Certification Tier III or better certified engines or other methods approved by the CARB as meeting or exceeding the Tier III standard or Tier II certified engines as long as no drilling or redrilling occurs during construction.  ii. Utilize a CARB Verified Level 3 diesel catalyst. The catalyst shall be capable of achieving an 85 percent reduction for diesel particulate matter. Copies of the CARB verification shall be provided to the director. Said catalysts shall be properly maintained and operational at all times when the off-road diesel construction equipment is in use.	All off-road diesel construction equipment engines utilized Tier III or better diesel engines plus Level 3 CARB verified diesel catalysts during all construction projects in 2017.



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17	E.2.m	<p>Drill Rig Engines. All drilling, re-drilling, and reworking rig diesel engines shall comply with the following provisions:</p> <p>i. Utilize CARB/EPA Certification Tier II or better certified engines, or other methods approved by CARB as meeting or exceeding the Tier II standard.</p> <p>ii. Utilize second generation heavy duty diesel catalysts capable of achieving 90 percent reductions for hydrocarbons and for particulate matter smaller than 10 microns. Said catalysts shall be properly maintained and operational at all times when the diesel engines are running.</p>	No drilling occurred in 2017.
18	E.2.n.	<p>Drilling and Redrilling Setbacks. The following setbacks shall apply within the oil field for drilling or re-drilling:</p> <p>i. At least 400 feet from developed areas.</p> <p>ii. At least 20 feet from any public roadway.</p>	All required drilling and re-drilling setbacks set forth in this policy were complied with as documented in the 2017 Drilling Plan and all subsequent, individual well permits approved by the County. However, no drilling or re-drilling occurred in 2017.
19	E.2.o	<p>Construction Schedule. To reduce construction air emissions, no overlap shall be permitted in major facility construction and installation activities such as the steam drive plant, the water processing facility, or the oil cleaning plant.</p>	There was no overlap in construction activity since no steam drive plant, water processing facility or oil cleaning plant were installed in 2017.
20	E.2.p	<p>Fugitive Dust Control Plan. The operator shall comply with the provisions of a fugitive dust control plan that has been approved by the director. The plan shall be based upon the requirements of SCAQMD Rule 403 and the SCAQMD CEQA Guideline Fugitive Dust Control Measures. The fugitive dust control plan shall be reviewed by the operator every five years to determine if modifications to the plan are required. Any modifications to the fugitive dust control plan shall be submitted to the director for review and approval. The fugitive dust control plan shall include any measured requested by the director.</p>	The Fugitive Dust Control Plan was submitted on March 26, 2009 and revised and approved in April 2010. Compliance with the provisions of the Plan are verified by the County ECC. The Operator reviewed the Plan on 11/21/16 and determined that no modifications to the plan are required. The County was notified of this determination on 11/21/16. Next review due in November 2021.
21	E.3.a	<p>Natural Gas Liquid Blending. Natural gas liquids at the gas plant shall be blended with the oil to the maximum allowable pipeline system vapor pressure. Natural gas liquids storage shall be limited to the volume allowed in the risk management plan approved by the fire department.</p>	SPR blends the natural gas liquids (NGLs) to the maximum allowable pipeline system vapor pressure as required by the subject CSD provision requirement. The storage of the NGL tank is in compliance with the criteria in the Risk Management Plan. The LA County Fire Department verifies compliance with this provision via site inspections.
22	E.3.b	<p>Propane and Natural Gas Liquids Bullet Fire-Proofing. The operator shall install and maintain fire-proofing insulation on all propane and natural gas liquids bullets within the oil field. The fire-proofing insulation shall have a minimum two hour fire rating and otherwise be acceptable to the fire chief. All propane and natural gas liquid bullets shall be equipped with an automatic deluge system.</p>	The propane and natural gas liquids bullet fire proofing was completed on February 23, 2009 with the associated documentation submitted to the LA County Fire Department on February 25, 2009.
23	E.3.c	<p>Steam Drive Plant Setback. The steam drive plant, if constructed, shall be located at least 1,000 feet from a developed area and shall use urea or equivalent, low toxicity material for any nitrogen oxide emission reduction that is required by the SCAQMD.</p>	A steam drive plant has not been proposed or constructed to date.
24	E.3.d.i	<p>The operator shall ensure that all existing oil tank areas in the oil field, unless determined by the director to be infeasible, and all the new oil tank areas shall have secondary containment (berms and/or walls) that can contain at least 110 percent of the largest oil tank volume to reduce the likelihood of oil spills entering the retention basins. In the event the director determines that it would be infeasible to provide 110 percent containment for a particular existing oil tank, the operator shall provide such containment as the director determines is feasible.</p>	As documented in the Operator's 2009 Tank Leak Detection and Containment at Inglewood Oil Field report, approved in May 2009, all tanks have secondary containment per this provision.



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25	E.3.d.ii	All retention basins in the oil field shall be adequately sized, and maintained to handle a 100-year storm event plus a potential spill of the volume of the largest tank that would drain into each basin.	The Operator's Retention Basin Study, completed in March 2009 and revised in September 2009 and January 2010, analyzed and modeled the capacities of the basins along with a 100 year storm event. The study concluded that the onsite basins have the capability to handle a 100 year storm event without flooding per the CSD requirement. The study further determined that in the event of an oil tank failure during a 100 year storm event, the basin weir system would prevent oil from going offsite. The County Public Works Department has reviewed and approved the retention basin capacities.
26	E.3.d.iii	All above ground piping in the oil field that contains or could contain oil shall be protected by basins or secondary containment measures (berms and/or walls).	Most of the above ground piping throughout the oil field is not protected by individual pipeline specific secondary containment or basin structures; however, the oil field retention basin system prevents any fluid from the above ground piping from traveling offsite.
27	E.4.a.i, ii and iii	<ul style="list-style-type: none"> <li>i. All proposed grading shall be subject to prior review and approval by the director of public works.</li> <li>ii. Grading involving up to 5,000 cubic yards and grading associated with the bioremediation farms may be undertaken pursuant to a county master grading plan stamped by a registered professional engineer and a California certified engineering geologist and approved by the director of public works.</li> <li>iii. No slope of cut or fill shall have a gradient steeper than two to one (2:1) unless specifically approved by a site specific geotechnical report.</li> <li>iv. Cuts and fills shall be minimized to avoid erosion and visual impacts.</li> </ul>	SPR conducts all grading in accordance with the Master Grading Plan as approved by the LA County Department of Public Works (DPW) on May 8, 2017.
28	E.4.b.ii	A site-specific geotechnical investigation shall be completed for grading in excess of 5,000 cubic yards, unless associated with the on-site Bioremediation Farms and approved pursuant to a master grading plan approved by the director of public works, and for any grading that supports or impacts a critical facility as determined by the director. The investigation shall be completed by a California certified engineering geologist and submitted to the director and the director of public works for review and approval, in conjunction with an application for a revised grading permit.	No grading that occurred in 2017 triggered the requirement for a site specific geotechnical investigation.
29	E.4.b.ii	A site-specific geotechnical investigation shall be completed for all proposed permanent structures. The investigation shall include analysis and recommendations associated with potential seismically induced ground failure, such as differential settlement and lateral spreading. The geotechnical investigation shall be completed by a California-certified engineering geologist and submitted to the director of public works for review and approval.	No permanent structures were proposed or built in 2017; hence no site specific geotechnical investigations were necessary.
30	E.4.c.i	The operator shall comply with all provisions of an erosion control plan that has been approved by the director. The erosion control plan shall be reviewed by the operator every two years to determine if modifications to the plan are required. Any modifications to the erosion control plan shall be submitted to the director for review and approval. The erosion control plan shall include any measures requested by the director.	The Operator's 2009 Erosion Control Plan Inglewood Oil Field was initially submitted on May 26, 2009, revised in October 2009 and approved by County Public Works in May 2010. The Operator reviewed the Erosion Control Plan on 5/4/16 and determined that no modifications to the plan are required. The next bi-annual review will occur in May of 2018.
31	E.4.d	Restoration of Slopes. Slopes shall be restored to their original grade once the use that required the grading of the slope has been discontinued. However, if restoration of a slope would negatively affect existing drainage patterns or slope stability, then the slope shall be restored to a grade that avoids these negative effects.	No grading that would negatively affect existing drainage patterns or slope stability occurred in 2017.





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32	E.4.e	<p>Ground Movement Surveys. The operator shall conduct ground movement surveys once every 12 months, or more frequently if determined necessary by the director of public works, following all provisions of a ground movement monitoring plan that is acceptable to DOGGR and the director of public works, that calls for both vertical and horizontal ground movement surveys, at specified survey locations within, and in the vicinity of, the oil field, utilizing high precision Global Positioning System technology, in combination with a network of ground stations (or any alternative technology specified in the ground movement monitoring plan approved by the director of public works), and following other survey methods outlined in the plan. The surveys shall be conducted by a California-licensed surveyor. The survey results shall be analyzed in relation to oil field activities, such as production, steam injection, and water flooding, taking into consideration individual oil producing zones, injection schedules, rates, volume, and pressure. The analysis shall be completed in collaboration by a California-registered professional petroleum engineer, registered geotechnical engineer, and certified engineering geologist. The results of the annual monitoring survey and analysis shall be forwarded to DOGGR and the director of public works. If requested by DOGGR or the director of public works, the operator shall make modifications to the ground movement monitoring plan. In the event that survey indicates that on-going ground movement, equal to or greater than 0.6 inches at any given location, or a lesser value determined by the director of public works is occurring in an upward or downward direction in the vicinity of or in the oil field, the operator shall review and analyze all claims or complaints of subsidence damage that have been submitted to the operator or the county by the public or a public entity in the 12 months since the last ground movement survey. Based thereon, the operator shall prepare a report that assesses whether any of the alleged subsidence damage was caused by oil operations and submit said report to DOGGR and the department of public works. The department of public works shall review the report to determine if it concurs with its conclusions. If the report concludes that damage has not been caused by oil operations, and the department of public works does not concur in that conclusion, it shall forward its conclusions to DOGGR for its review and possible action. If the report concludes that damage was caused by oil operations and the department of public works concurs with any such conclusion, the department of public works shall forward the department of public works' conclusions to DOGGR and ask DOGGR to evaluate the operator's fluid injection and withdrawal rates to determine whether adjustments to these rates may alleviate the ground movement, and if so, where in the oil field such adjustments should be made. The operator shall implement whatever adjustments in the rates of fluid injection and/or withdrawal that DOGGR determines are necessary and appropriate to alleviate any ground movement damage. The county shall promptly notify the CAP of any such action that is taken pursuant to this subsection. Injection pressures associated with secondary recovery operations (i.e., water flooding) or disposal of produced fluids shall not exceed reservoir fracture pressures as specified in Title 14 of the California Code of Regulations, section 1724.10, and as approved by the DOGGR.</p>	<p>Ground movement surveys have been completed as required by the approved Accumulated Ground Movement Plan. The Year 2016 annual survey was submitted on September 15, 2017 to DPW and DOGGR . Plans are to begin surveying in January 2018 for the Year 2017 report.</p> <p>Five monuments had a change in elevation in excess of the 0.6” threshold in Year 2017. All five monuments were uplifted. Therefore, investigations were conducted on the two property damage claim received. The subsequent reports were submitted to County Public Works and DOGGR for review. Both reports concluded that the damage was not caused by oil field activities.</p>
33	E.4.f	<p>Construction of Permanent Structures. No permanent structures shall be constructed in an Alquist-Priolo Fault Zone without preparation of a fault study by a California-certified engineering geologist. Following the fault study, no permanent structures shall be placed within 50 feet of a known active fault. The fault investigation report shall be submitted to the director of public works for review and approval.</p>	<p>No permanent structures have been constructed in an Alquist-Priolo Fault Zone since the adoption of the CSD.</p>
34	E.4.g	<p>Oil Field Accelerometer. The operator shall operate and maintain an accelerometer at the oil field to determine site-specific ground accelerations as a result of any seismic event in the region (Los Angeles/Orange County and offshore waters of the Santa Monica Bay and San Pedro Channel). Readings from the accelerometer shall be recorded at the oil field and transmitted in real-time to the Caltech Seismological Laboratory. The operator shall cease operations and inspect all oil field pipelines, storage tanks, and other infrastructure following any seismic event that exceeds a ground acceleration at the oil field of 13 percent of gravity (0.13 g) and promptly notify the director. The operator shall not reinstitute operations at the oil field and associated pipelines until it can reasonably be determined that all oil field infrastructure is structurally sound.</p>	<p>The oil field accelerometer seismic station was installed and began collecting data on May 20, 2009. The data is transmitted in real time by cell link to the CalTech Seismological Laboratory where the data is recorded and stored. The accelerometer has not measured ground acceleration in excess of the 13 percent of gravity (0.13 g) criteria of this provision to date, thus the oil field has not been required to shut in due to a ground acceleration event.</p>
35	E.4.h	<p>Pipeline Management Plan. The operator shall maintain and implement a pipeline management plan that meets the requirements of DOGGR regulations.</p>	<p>The pipeline management plan is being maintained per DOGGR regulations.</p>



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36	E.4.i	Paleontological Monitor. The operator shall have a qualified paleontologist, approved by the director, monitor all rough grading and other significant ground disturbing activities in paleontological sensitive sediments. The sensitive sediments that have been identified within the oil field include the Lower to Middle Pleistocene San Pedro Formation and the Middle to Upper Pleistocene Lakewood Formation. A paleontologist will not be required on site if excavation is only occurring in artificial fill or Holocene alluvium.	In 2017, no work occurred in paleontological sensitive sediments. As such, no monitoring occurred.
37	E.5.a	E.5.a Noise Limits. The operator shall comply with the following provisions: i. All oil operations on the oil field shall comply with the noise provisions of Chapter 12.08 of Title 12 of the County Code, with the exception of drilling, redrilling, and reworking, which are exempt from the provisions of said chapter. ii. Hourly, A-weighted equivalent noise levels associated with drilling, redrilling, and reworking shall not elevate existing baseline levels by more than five dBA at any developed area. For daytime activities (7:00a.m. to 7:00p.m.) existing baseline noise levels shall be defined as the maximum daytime equivalent noise level (Leq) at the closest monitoring site as shown in Table 4.9.3 of the 2008 Baldwin Hills Community Standards District Environmental Impact Report. For nighttime activities (7:00 p.m. to 7:00a.m.), existing baseline noise levels shall be defined as the minimum nighttime equivalent noise level (Leq) at the closest monitoring site as shown in Table 4.9.3 of the 2008 Baldwin Hills Community Standards District Environmental Impact Report. Updated baseline noise levels may be set and additional monitoring sites may be established, from time to time by the director. In no case shall baseline noise levels include any drilling, redrilling, or reworking operations. iii. Noise produced by oil operations shall include no pure tones when measured at a developed area.	Noise monitoring to date has not identified any violations associated with oil field operations above the baseline levels of the noise limits set forth in the CSD or Settlement Agreement.
38	SA 2	a. The CSD currently provides that hourly, A-weighted equivalent noise levels associated with drilling, redrilling and reworking wells shall not elevate baseline levels (which shall not include drilling, redrilling or reworking operations) by more than five A-weighted decibels ("dBA") at the Oil Field boundary of any Developed Area. Instead of the referenced five dB A provision, PXP shall limit the night time (10 p.m. to 7 a.m.) noise levels at Developed Areas to no more than three dBA above a one-hour baseline average for the defined nighttime period, but at no time will PXP be required to maintain noise levels below the baseline nighttime noise levels. Furthermore, PXP and the County determined the baseline noise levels at four additional Oil Field boundary locations near Developed Areas, selected by PXP and the County, in addition to the seven utilized in the EIR for a total of 11 locations. If PXP violates the above noise requirements, no new drilling or redrilling permits shall be issued by the County until PXP, in consultation with the County, identifies the source of the noise and PXP takes steps necessary to assure compliance with the above-specified threshold. b. If drilling, redrilling or reworking operations elevate nighttime baseline noise levels by more than 10 dBA for more than 15 minutes in any one hour as independently verified and determined by the County, PXP, in consultation with the County, shall identify the cause and source of the noise and take steps to avoid such extended periods of noise elevation in the future. This provision does not negate the CSD noise limits between 7 a.m. to 10 p.m.	Noise monitoring to date has not identified any violations associated with oil field operations above the baseline levels of the noise limits set forth in the CSD or Settlement Agreement.
39	E.5.b	Backup Alarms. Backup alarms on all vehicles operating within the oil field shall be disabled between the hours of 8:00 p.m. and 8:00 a.m. During periods when the backup alarms are disabled, the operator shall employ alternate, low-noise methods for ensuring worker safety during vehicle backup, such as the use of spotters.	This provision has been implemented and is ongoing.
40	E.5.c	Quiet Mode Drilling Plan. All drilling and redrilling on the oil field between the hours of 6:00 p.m. and 8:00 a.m. shall be conducted in conformity with a quiet mode drilling plan that has been approved by the director and the director of public health. The quiet mode drilling plan shall be reviewed by the operator every year to determine if modifications to the plan are required. The operator shall make changes to the plan if requested by the director or the director of public health. Any modifications to the quiet mode drilling plan shall be submitted to the director and the director of public health for review and approval. The quiet mode drilling plan shall include any measures requested by the director or the director of public health.	No drilling and redrilling activities occurred in 2016. SPR reviewed the Quiet Mode Drilling Plan on 11/21/16 and concluded that there are no modifications necessary to the plan In 2017.
41	E.5.d	Equipment Servicing. All noise producing oil field equipment shall be regularly serviced and repaired to minimize increases in pure tones and other noise output over time. The operator shall maintain an equipment service log for all noise-producing equipment.	SPR Operations maintains service records for such equipment.





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42	E.5.e	Deliveries to the Oil Field. Deliveries to the oil field shall not be permitted after 8:00 p.m. and before 7:00a.m. except in cases of emergency. Deliveries on Sundays or legal holidays shall not be permitted after 8:00 p.m. or before 9:00a.m., except in cases of emergency.	This provision has been implemented and is ongoing.
43	E.5.f	Deliveries within the Oil Field. Deliveries to areas of the oil field located within 500 feet of any residential property shall not be permitted after 5:00 p.m. or before 7:00a.m. except in cases of emergency. Deliveries to such areas on Sundays or legal holidays shall not be permitted after 5:00 p.m. and before 9:00a.m., except in cases of emergency.	This provision has been implemented and is ongoing.
44	E.5.g	Time Limits for Construction. Construction of permanent structures shall not be permitted after 7:00 p.m. and before 7:00a.m., or during Saturdays, Sundays, or legal holidays.	No construction occurs after 7:00 p.m. and before 7:00 a.m., or during Saturdays, Sundays, or legal holidays.
45	E.5.h	Construction Equipment. All construction equipment shall be selected for low-noise output. All construction equipment powered by internal combustion engines shall be properly muffled and maintained.	All construction equipment is selected to comply with this provision.
46	E.5.i	Construction Equipment Idling. Unnecessary idling of construction equipment internal combustion engines is prohibited.	All SPR construction equipment operators implement this provision.
47	E.5.j	Worker Notification. The operator shall instruct employees and subcontractors about the noise provisions of this subsection E.5 prior to commencement of each and every drilling, redrilling, reworking, and construction operation, and shall annually certify to the director that such employees and subcontractors have been properly trained to comply with such noise provisions. The operator shall prominently post quiet mode policies at every drilling and redrilling site.	No drilling or redrilling occurred in 2017.
48	E.6	Vibration Reduction. All oil operations on the oil field shall be conducted in a manner that minimizes vibration. Additionally, vibration levels from oil operations at the oil field shall not exceed a velocity of 0.25 mm/s over the frequency range 1 to 100 Hz at any developed area.	All operations are conducted to minimize vibration. The report prepared by the County in response to the request by PXP in October 2011 to increase the annual number of wells allowable for drilling or redrilling, the Annual Well Increase Evaluation, December 2011, includes analysis on the implementation of the vibration provision of the CSD. The report concluded that the CSD requirements have been effective at keeping vibration to a level that is considered protective of the health and general welfare of the public. Further, the draft periodic review concluded that this provision is fully effective.
49	E.7.a	Oil Spill Response. The operator shall comply with all provisions of an Emergency Response Plan ("ERP") that has been approved by the director, to protect biological species and to revegetate any areas disturbed during an oil spill or clean-up activities. The operator shall make changes to the ERP if requested by the director. Any modifications to the ERP shall be submitted to the director for review and approval. The ERP shall include any measures to protect biological species that may be requested by the director.	Since approval of the ERP by DRP, no updates have been needed or requested.
50	E.7.b	Special Status Species and Habitat Protection. The operator shall comply with all provisions of a special status species and habitat protection plan that has been approved by the director. The operator shall make changes to the plan if requested by the director. Any modifications to the plan shall be submitted to the director for review and approval. The special status species and habitat protection plan shall include any measures requested by the director.	The Special Status Species and Habitat Protection Plan was first prepared in 2009 and was approved on November 15, 2010. The plan was prepared by a County approved ecologist/biologist. Compliance with subsections E.7.b through E.7.h has been documented annually since 2010 - the 2017 compliance report was submitted on 12/15/17.



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51	E.7.c, h	<p>c) Habitat Restoration and Revegetation Plan. Prior to any disturbance of sensitive natural habitat areas, as identified in the special status species and habitat protection plan, the operator shall hire a biologist, approved by the county, to conduct a survey of the area to determine if significant impact to sensitive natural habitat, including coastal sagebrush, coyote bush scrub, riparian scrub, and oak woodland will occur. If the biologist determines that significant impact to sensitive natural habitat will occur, then the operator shall have a county-approved restoration specialist, with expertise in southern California ecosystems and revegetation techniques, prepare a habitat restoration and revegetation plan. The plan shall be submitted to the director for review and approval. The director shall make best efforts to complete the review of the plan as expeditiously as possible and shall then either approve the plan or provide the operator with a list of specific items that must be included in the plan prior to approval. No removal of sensitive natural habitat shall occur until the plan has been approved by the director. The habitat restoration and revegetation plan shall include any measures requested by the director.</p> <p>h) Habitat Restoration. Within 60 days of completion of construction activities that have significantly impacted sensitive natural habitat, the operator shall begin habitat restoration consistent with the approved native habitat restoration and revegetation plan discussed in subsection E.7.c. Restoration priority shall be given to areas of degraded habitat connecting areas of higher quality habitat and where restoration would produce larger corridors to support the migration and movement of wildlife. The operator shall replace any significant loss of sensitive natural habitat at the following ratios:</p> <p>i. 1:1 for each acre of coastal sagebrush or coyote bush scrub.</p> <p>ii. 2:1 for each acre of riparian scrub or oak woodland.</p>	No Habitat Restoration and Revegetation Plans were necessary in 2017.
52	E.7.d, e, f, g	<p>d) Pre-Construction Surveys. The following surveys shall be conducted prior to any significant vegetation removal in sensitive natural habitat as identified in the special status species and habitat protection plan.</p> <p>e) Listed Plant or Wildlife Species. If federal- or State-listed plant or wildlife species are found, then the operator shall comply with all applicable United States Fish and Wildlife and California Department of Fish and Game rules and regulations.</p> <p>f) Construction Monitoring. If the pre-construction surveys find sensitive plant, wildlife species, or nesting birds, a biological monitor hired by the operator, and approved by the County, shall be on site during construction to monitor the construction activities.</p> <p>g) Tree and Riparian Scrub Removal. Removal of native or non-native trees and riparian scrub vegetation shall be scheduled, as possible, for removal outside the nesting season to avoid impacts to nesting birds. If avoidance of removal of trees or riparian scrub during the recommended periods is not possible, a county-approved biologist shall perform a survey to ensure that no nesting birds are present prior to removal. If for any reason a nest must be removed during the nesting season, the operator shall provide written documentation to the director demonstrating concurrence from the United States Fish and Wildlife Service and California Department of Fish and Game authorizing the nest relocation and a written report documenting the relocation efforts.</p>	Any required pre-construction surveys or construction monitoring that was completed in 2017 is documented in the 2017 Special Status Species and Habitat Protection Plan annual report which was submitted to DRP on 12/15/17. No listed plant or wildlife species were found.
53	E.8.a	Cone Trust House. Oil operations shall not result in impacts to the Cone Trust House	The Cone Trust House is off limits to oil field staff to prevent any impacts to the building.
54	E.8.b	E.8.b: Archaeological Training. The operator shall provide archeological training for all construction personnel who will be involved with ground disturbance activities at the oil field. All such construction personnel shall be required to participate in the training and will receive training material prepared by a qualified archaeologist prior to working on ground disturbance activities.	No construction operations occurred in 2017.
55	E.8.c	Construction Treatment Plan. The operator shall comply with all provisions of a construction treatment plan, approved by the director, to ensure that any new archeological discoveries are adequately recorded, evaluated, and, if significant, mitigated. In the event that unknown archeological artifacts are encountered during grading, clearing, grubbing, and/or other construction activities, work shall be stopped immediately in the vicinity of the find and the resource shall be evaluated by a qualified archaeologist, approved by the director. The construction treatment plan shall include any measures requested by the director.	No archaeological artifacts were uncovered In 2017.



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#	CSD Section/ Plan	CSD Language	Compliance Description																								
56	E.9	<p>Lighting. Outdoor lighting shall be restricted to only those lights which are required by code for the lighting of building exteriors, drilling, and re-drilling rigs and for safety and security needs. In addition, the operator shall comply with the following provisions:</p> <p>a. Screening. All new point lighting sources within the oil field shall be screened and directed to confine direct rays to the oil field and to prevent offsite spillover lighting effects to the extent feasible.</p> <p>b. Lighting Plan. A detailed lighting plan shall be prepared for each new permanent structure and submitted to the director for review and approval. No work may be commenced on such permanent structure until the lighting plan therefore has been approved by the director. The lighting plan shall include any measures requested by the director.</p>	In November 2008, an assessment of all oil field lighting was completed to confirm compliance with the CSD lighting provisions and to confirm that there were no offsite lighting impacts.																								
57	E.10 SA 11 G.7 (2015)	<p>E.10: Landscaping, Visual Screening, Irrigation and Maintenance. The operator shall comply with the conceptual landscaping plan for the oil field prepared by Mia Lehrer &amp; Associates, dated October 2008, on file at the department of regional planning, which is intended to beautify and screen the oil field from adjoining residential, recreational, and institutional areas or adjacent public streets or highways. Landscaping required by this plan shall be completed in phases over a two-to five-year period as approved by the director. All landscaping on the oil field shall be routinely inspected (on at least a monthly basis) and maintained in a neat, clean, and healthful condition, including proper watering, pruning, weeding, fertilizing, and replacement of plants as needed. Litter shall also be removed on a regular basis.</p> <p>SA 11: Landscaping. PXP agrees to prepare and implement a series of landscape plans ("Landscape Plans") that enhance the Mia Lehrer Landscape Improvements Concepts plan dated November 4, 2008 to include, but not be limited to, landscaping along or near the border of the Oil Field in consultation with the County and subject to the County's approval. PXP's Landscape Plans shall be forwarded to the CAP for review.</p> <p>PXP will use best efforts to complete installation of the first two phases of the Landscape Plans along La Brea, between Stocker and Slauson, and Ladera Crest, within nine (9) months of County's final approvals of each of those first two Landscaping Plans using best landscaping practices. PXP agrees that it will complete the entire landscaping required by the County-approved Landscape Plans within three years after approval by the County of the final phase.</p> <p>G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "FM O&amp;G schedule installation of the remaining E.10 landscaping phases to achieve the landscaping required by this provision in a timely manner.</p>	<p>All phases of landscaping have been submitted and approved. The schedule of approvals and work is summarized in the table below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Phase</th> <th style="text-align: center;">Plan</th> <th style="text-align: center;">Landscaping</th> </tr> </thead> <tbody> <tr> <td>1-Ladera Crest View-shed North</td> <td style="text-align: center;">Approved 5/11/11</td> <td style="text-align: center;">Completed 10/20/11</td> </tr> <tr> <td>2-Windsor Hills La Brea View-shed</td> <td style="text-align: center;">Approved 10/11/11</td> <td style="text-align: center;">Completed 6/12/12</td> </tr> <tr> <td>3-La Brea View-shed East/La Cienega Blvd</td> <td style="text-align: center;">Approved 6/6/13</td> <td style="text-align: center;">Scheduled to start 7/1/18</td> </tr> <tr> <td>4-La Cienega Roadway East</td> <td style="text-align: center;">Approved 6/6/13</td> <td style="text-align: center;">Completed 11/10/16</td> </tr> <tr> <td>5-La Cienega Roadway West</td> <td style="text-align: center;">Approved 6/6/13</td> <td style="text-align: center;">Completed 11/1/15</td> </tr> <tr> <td>6-Fairfax Ave Roadway East and West</td> <td style="text-align: center;">Approved 4/19/16</td> <td style="text-align: center;">Completed 11/1/17</td> </tr> <tr> <td>7-Stocker Street Roadway North and South</td> <td style="text-align: center;">Approved 4/19/16</td> <td style="text-align: center;">Started 1/15/18</td> </tr> </tbody> </table>	Phase	Plan	Landscaping	1-Ladera Crest View-shed North	Approved 5/11/11	Completed 10/20/11	2-Windsor Hills La Brea View-shed	Approved 10/11/11	Completed 6/12/12	3-La Brea View-shed East/La Cienega Blvd	Approved 6/6/13	Scheduled to start 7/1/18	4-La Cienega Roadway East	Approved 6/6/13	Completed 11/10/16	5-La Cienega Roadway West	Approved 6/6/13	Completed 11/1/15	6-Fairfax Ave Roadway East and West	Approved 4/19/16	Completed 11/1/17	7-Stocker Street Roadway North and South	Approved 4/19/16	Started 1/15/18
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58	E.11.a and b	<p>Oil Field Waste Removal. The operator shall comply with the following provisions:</p> <p>a) Waste Collection. All drilling, re-drilling, and reworking waste shall be collected in portable steel bins compliant with United States Department of Transportation standards. Any drilling, re-drilling, and reworking wastes that are not intended to be injected into a Class II Well, as permitted by DOGGR, shall be removed from the oil field no later than 30 days following completion of the drilling, re-drilling, and reworking. This provision does not apply to active sumps and mud pits.</p> <p>b) Waste Discharge. No oil field waste shall be discharged into any sewer, storm drain, irrigation systems, stream or creek, street, highway, or drainage canal. Nor shall any such wastes be discharged on the ground provided that the foregoing shall not prohibit the proper use of active drilling sumps and mud pits.</p>	All reworking wastes were collected in portable steel bins compliant with USDOT standards and removed from the field within 30-days of completion of the activity. No drilling or re-drilling occurred in 2017. There are no sumps or mud pits on the field. No oil field waste was discharged off site.																								
59	E.11.c	Recycling Plan. The operator shall comply with all provisions of a recycling plan that has been approved by the director. The recycling plan shall include any elements requested by the director.	The Recycling Plan was approved on October 3, 2011 and has been implemented and is ongoing.																								



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60	E.12	Construction of Private Roads. Roads and other excavations shall be designed, constructed, and maintained to provide stability of fill, minimize disfigurement of the landscape, prevent deterioration of vegetation, maintain natural drainage, and minimize erosion. Prior to construction of any new road, the operator shall prepare and submit to the director of public works for review and approval a private road construction plan. The operator shall thereafter comply with all provisions of the approved private road construction plan. All new private access roads leading off any surfaced public street or highway shall be paved with asphalt or concrete not less than three inches thick for the first 50 feet of said access road from the public street or highway.	No private roads have been constructed to date and all oil field activities utilize existing access roads.
61	E.13.a-e	<p>Signs. All signage shall comply with Part 10 of Chapter 22.52 of Title 22. In addition, the operator shall comply with the following provisions:</p> <p>a. Perimeter Identification Signs. Identification signs, at intervals acceptable to the director, shall be posted and maintained in good condition along the outer boundary line fence and along the fences adjoining the public roads that pass through the oil field. Each sign shall prominently display current and reliable emergency contact information that will enable a person to promptly reach, at all times, a representative of the operator who will have the expertise to assess any potential problem and recommend a corrective course of action. Each sign shall also have the telephone number of the county department of regional planning zoning enforcement section and the number of SCAOMD that can be called if odors are detected.</p> <p>b. Main Entrance Sign. A sign shall be posted and maintained in good condition at the main entrance of the oil field prominently displaying a telephone number by which persons may contact a representative of the operator at all times to register complaints regarding oil field operations.</p> <p>c. Other Required Signs. All identification signs, warning signs, no trespassing signs, and other signs required by county, state and federal regulations shall be properly posted and maintained in all required locations and in good condition.</p> <p>d. Well Identification Signs. Well identification signs including the well name and well number shall be posted and maintained in good condition at each well location.</p> <p>e. No Littering Signs. "No littering" signs shall be prominently posted and maintained in good condition on all oil field entrance gates.</p>	The installation of the signage required by this provision was completed upon approval of the Signage Plan dated January 2009 (Revision1) and approved by the County on May 18, 2009. In 2017, all required signage was updated to reflect to the name new Operator, Sentinel Peak Resources (SPR), of the oil field, and to remove the name of the previous Operator, Freeport-McMoRan Oil & Gas (FM O&G).
62	E.14	Painting. All oil operation-related structures visible from public roadways and surrounding properties within the oil field shall be painted or otherwise surfaced or textured with a color that is compatible with the surrounding areas and has been approved by the director. The painting or other surfacing of all structures covered by this subsection shall thereafter be maintained in good condition.	The painting of the Inglewood Oil Field structures and equipment was completed on November 12, 2012. The paint color, licorice, was chosen with assistance of a landscape architect and was approved by the LA County Department of Regional Planning. Maintenance of the painting and coatings of the equipment and structures at the oil field is a continuous process.
63	E.15 G.7 (2015)	<p>Sumps. The operator shall comply with all of the following provisions:</p> <p>a. Sump Clean Out. All sumps that are used, installed, or maintained for use in connection with any well, and which have not been used for 90 days for the operation of or the drilling, re-drilling, or reworking of such well or any other well in the vicinity, shall be cleaned out, and all oil, rotary mud, and rubbish removed.</p> <p>b. Sump Fencing. Around each sump of any depth, there shall be erected and continuously maintained a fence that encloses the sump and complies with the requirements of Sections 11.48.010 - 11.48.050, Title 11 of the County Code. This provision shall not apply to sumps that are constantly and immediately attended while drilling, re-drilling, and reworking operations are proceeding as specified in Section 11.48.020, Title 11 of the County Code.</p> <p>G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "the Operator continue the use of metal and or plastic bins E.15.a and tanks consistent with current practice as the elimination of the use of below ground sumps is considered to be a significant environmental benefit.</p>	There are no sumps at the Inglewood Oil Field.



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#	CSD Section/ Plan	CSD Language	Compliance Description
64	E.16.a-d	<p>Well Cellars. All well cellars shall be constructed in accordance with the most current American Petroleum Institute standards. In addition, the operator shall comply with the following provisions:</p> <p>a. Cellar Fluids. Well cellars shall be kept free of all oil, water, or debris at all times. During drilling, re-drilling, and reworking, the cellar shall be kept free of excess fluids by a pump which discharges into a waste tank, mud pit, vacuum truck, or other approved disposal system.</p> <p>b. Access to Multi-Well Cellars. All multi-well cellars exceeding three feet in depth and 25 feet in length shall have two means of entrance and exit and an additional exit for every 50 feet in length thereafter. At least one means of entrance or exit for all multi-well cellars of 25 feet in length shall be a stairway constructed to California Division of Industrial Safety standards.</p> <p>c. Single-Cellar Covers. All single-cellars shall be covered with open grating and have no openings larger than three inches at any point. Covers shall be capable of supporting vehicle weight or guardrails shall be erected to prevent vehicle access.</p> <p>d. Cellar Ladder Openings. All openings for ladders through grating shall be designed to allow exit from underside without obstruction and shall be kept free of storage of any type. Said openings shall not be less than 24 inches on either side.</p>	Implementation is ongoing where applicable.
65	E.17.a	<p>Construction Storm Water Pollution Prevention Plan ("SWPPP"). The operator shall maintain and implement all provisions of a storm water pollution prevention plan ("SWPPP") that has been inspected by the Regional Water Quality Control Board and the county department of public works. The operator shall provide the director and the director of public works with a copy of the SWPPP, and any future modifications, revisions, or alterations thereof, or replacements therefore. The SWPPP shall be updated prior to new construction activities as required by the Regional Water Quality Control Board.</p>	The DPW was provided with the most up-to-date copy of the RWQCB reviewed SWPPP on 11/26/13.
66	E.17.b	<p>Spill Prevention, Control, and Countermeasure Plan ("SPCCP"). The Operator shall maintain and implement all provisions of a spill prevention, control, and countermeasure plan ("SPCCP") which meets the requirements of the Local California Unified Program Agency and the United States Environmental Protection Agency. The operator shall provide the director and the fire chief with a copy of the SPCCP and any future modifications, revisions, or alterations thereof, or replacements therefore.</p>	FM O&G provided DRP and the Los Angeles County Fire Department (LACFD) a copy of the most up-to-date SPCC on 08/15/16. This is the most recent SPCC plan and was not changed in 2017.
67	E.17.c	<p>Hydrological Analysis. A site-specific hydrologic analysis shall be completed to evaluate anticipated changes in drainage patterns and associated increased runoff at the site for any new grading that results in the loss of vegetated, sandy, permeable ground areas, which could alter surface runoff at the site. The analysis shall be completed consistent with Standard Urban Stormwater Mitigation Plan regulations, as specified in the county department of public works Hydrology Manual as amended. The hydrological analysis shall be submitted to the director of public works for review and approval. The new grading that required the hydrologic analysis shall not occur until approval of the analysis by the director of public works.</p>	The hydrologic analysis has not occurred to date because no oil field projects have triggered the requirement.
68	E.18	<p>Water Management Plan. The operator shall comply with all provisions of a water management plan that has been approved by the director and the director of public works. The plan shall include best management practices, water conservation measures, the use of a drip irrigation system, and shall include provisions for the use of surface water runoff in the retention basins for dust suppression and landscaping. The plan shall also address the availability of reclaimed water for use at the oil field. The water management plan shall be reviewed by the operator every three years to determine if modifications to the plan are required. The operator shall make changes to the plan if requested by the director or the director of public works. Any modifications to the water management plan shall be submitted to the director and the director of public works for review and approval. The water management plan shall include any elements requested by the director or the director of public works. In addition, the operator shall comply with the water conservation measures and reporting requirements specified in Sections 20.09.020- 20.09.080, Title 20 of the County Code (Utilities).</p>	The Water Management Plan was initially submitted in May 2009 and was formally approved by County Public Works on August 8, 2012 and the County DRP on September 13, 2012. The County has not required any changes to the Plan since then. The Operator reviewed the Water Management Plan on 09/11/15 and determined that no changes are necessary. The next triennial review will occur in September of 2018.





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#	CSD Section/ Plan	CSD Language	Compliance Description
69	E.19 G.7 (2015)	<p>E.19: Groundwater Monitoring. The operator shall develop, implement, and carry out a groundwater quality monitoring program for the oil field that is acceptable to the director and consistent with all requirements of the Regional Water Quality Control Board. Pursuant to the approved program, the operator shall install and maintain groundwater monitoring wells in the vicinity of each surface water retention basin, which is permitted by the Regional Water Quality Control Board. Such monitoring wells shall be completed to the base of the permeable, potentially water bearing, alluvium, Lakewood Formation, and San Pedro Formation, and to the top of the underlying, non-water bearing Pica Formation, as determined by a California-certified professional geologist. The Regional Water Quality Control Board and the director shall be regularly advised of the results of such monitoring and shall be immediately advised if such monitoring indicates a potential problem.</p> <p>G.7: The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "the Operator coordinate with the RWQCB and install additional groundwater monitoring wells if deemed necessary."</p>	<p>Quarterly groundwater sampling was conducted on a quarterly basis consistent with the provisions of the Groundwater Monitoring Program and Work plan, and monitoring reports were submitted to DRP and the Los Angeles Regional Water Quality Control Board (RWQCB) quarterly.</p> <p>As noted in G.7 (2015), the RWQCB submitted a comment letter to DRP on 10/17/12 regarding the 2013 Annual Drilling Plan (E.26.c) that recommended the installation of "an up-gradient groundwater quality monitoring well (or network) that can establish water quality conditions at the perimeter of the field." Subsequently, in 2013, the RWQCB evaluated the field's groundwater monitoring program as part of the land treatment unit permit renewal process. The permit was amended from the prior 2010 permit to reflect the following:</p> <ul style="list-style-type: none"> <li>• Shallow wells for semi-annual monitoring (rather than the quarterly monitoring previously required in the 2010 permit) include MW-2, 3, 5, 6, 7, 8 and 9;</li> <li>• A new requirement for deep well annual monitoring of MW 11B and 13.</li> <li>• A new requirement to conduct statistical analysis of the results of the groundwater quality monitoring to identify background conditions, and changes from background conditions (if any). Regulatory action triggers were established in the event that changes from background conditions are detected.</li> </ul> <p>As such, through the 2013 land treatment unit permit renewal process, the RWQCB re-evaluated and on 2/7/13 approved the groundwater monitoring program with changes as iterated above that respond to their concerns in their 10/17/12 comment letter. Therefore, this periodic review recommendation has been fulfilled. For 2017, Quarterly Groundwater Monitoring was conducted each quarter as described in the monitoring reports submitted to CSD and dated March, July, &amp; October 2017, and January 2018.</p>
70	E.20 G.7 (2015)	<p>Fencing. All portions of the oil field on which oil operations are conducted shall be enclosed with a fence compliant with DOGGR regulations codified at California Code of Regulations Title 14, Article 3, sections 1778 and 1779, or as may be subsequently amended by the state.</p> <p>G.7: The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "the ECC and the Operator increase monitoring of the condition of the perimeter fencing and conduct any necessary repairs as soon as possible.</p>	<p>The Inglewood Oil Field is enclosed by fencing and gates compliant with the regulations cited in this provision. Both SPR and the ECC monitored the perimeter fencing on a regular basis to ensure the integrity of the fencing is maintained.</p>
71	E.21.a SA.12	<p>E.21.a: Equipment Removal. All facilities that have reached the end of their useful economic life shall be properly decommissioned and removed from the oil field within one year. Areas not slated for future use shall be restored and revegetated within 90 days of termination of use, unless such restoration and revegetation would interfere with fire safety or access to oil operations.</p> <p>SA.12: Clean-Up Plan. The CSD requires PXP to decommission and remove facilities that have reached the end of their useful economic life (County Code section 22.44.142.E.21.a) and submit to the County for its approval an unused or abandoned equipment removal plan (County Code section 22.44.142.L.14). PXP has submitted such a plan in 2009 and shall periodically update the plan should additional equipment, not identified in PXP's original removal plan, become unused or abandoned. Equipment and materials not necessary to oil field operations as identified by the Director of Planning shall be promptly removed from view of Sensitive Developed Areas as addressed in the plan.</p>	<p>The equipment removal plan was updated through December 2016 and submitted to DRP on 12/1/17. No equipment became unused or abandoned since.</p>
72	E.21.b	<p>Equipment Maintenance. All equipment, improvements, facilities, and other personal property or fixtures located on the oil field shall be maintained in good condition to the satisfaction of the director and the director of public works.</p>	<p>Equipment at the oil field is inspected and maintained by the field operations staff with operators completing rounds of the facility daily.</p>
73	E.21.c	<p>Site Debris and Vegetation. The operator shall keep the property free of debris and vegetation overgrowth to the satisfaction of the director. All outside storage of parts or equipment shall comply with Part 7 of Chapter 22.52 of the County Code.</p>	<p>The Inglewood Oil Field is kept free of debris and vegetation overgrowth.</p>



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74	E.22	Security. All unmanned entrances to the oil field shall be equipped with sliding gates which shall be kept closed at all times except when authorized vehicles are entering or leaving the oil field. The operator shall have a security guard on duty 24 hours per day.	All gates at the oil field are consistent with these regulations and all unmanned entrances are equipped with the required sliding type gates.
75	E.23	Vehicle Parking. Vehicular parking shall comply with Part 11 of Chapter 22.52 of County Code.	All vehicle parking complies with the referenced code.
76	E.24.a	Sanitation. The operator shall comply with the following provisions: a. Garbage and Refuse. The oil field shall be maintained in a clean, sanitary condition, free from accumulations of garbage, refuse, and other wastes.	The field is maintained in accordance with this provision. Garbage and refuse are picked up and removed weekly by a subcontractor garbage collection company.
77	E.24.b	Toilets and Wash Facilities. Sanitary toilet and washing facilities shall be installed at any site where personnel are permanently stationed. Portable facilities shall be provided wherever crews are temporarily employed. Such facilities shall be maintained in a clean and sanitary condition at all times.	Permanent toilet and wash facilities are located at the office building, the warehouse, the gas plant, the "halfway house" across from the gas plant, and at two modular buildings used by sub-contractors. The restroom facilities are maintained by a sub-contractor janitorial service. Portable facilities are located throughout the field and moved as needed, the portable restrooms are maintained by the subcontractor providing the units.
78	E.25	Storage of Hazardous Materials. The operator shall comply with all provisions of a hazardous materials business plan that has been submitted to the fire chief. The operator shall deliver to the fire chief for review and approval an updated hazardous material business plan on an annual basis. This plan shall provide the location of where hazardous materials are stored at the oil field. Hazardous materials shall be stored in an organized and orderly manner and identified as may be necessary to aid in preventing accidents, and shall be reasonably protected from sources of external corrosion or damage to the satisfaction of the fire chief.	The annual Hazardous Materials Business Plan was submitted to the LA County Fire Chief on 2/23/17.
79	E.26.a	DOGGR Regulations. All DOGGR regulations related to drilling, redrilling, and reworking operations.	Drilling, redrilling and reworking operations are in compliance with all applicable DOGGR regulations; however, no drilling or redrilling occurred in 2017.
80	E.26.b SA 3	E.26.b: Number of Drilling and Redrilling Rigs. No more than three drilling or redrilling rigs shall be present within the oil field at any one time. SA 3: Notwithstanding the CSD's allowance for operations of a maximum of three drill rigs at any one time on the Oil Field, PXP shall limit to two the number of drill rigs in use at any one time.	The approved 2017 Drilling Plan required per Section E.26.c limits SPR to two drilling rigs, and no more than two drilling rigs have been - or plan to be - used at any one time on the Oil Field.
81	E.26.c SA 1	Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan. Before the end of each calendar year, the operator shall develop and deliver to the director an annual drilling, redrilling, well abandonment, and well pad restoration plan, which shall describe all drilling, redrilling, well abandonment, and well pad restoration activities that may be conducted during the upcoming calendar year. Drilling and redrilling shall be scheduled to avoid over concentration of such activities in that year in any one area if located near a developed area. The operator may at any time submit to the director proposed amendments to the then current annual plan. No drilling, redrilling, or abandonment activity may be commenced unless it is described in a current annual plan (or an amendment thereto) which has been approved by the director. The annual plan (and any amendments) shall be provided to the CAP for review and comment. All comments on the annual plan from the CAP shall be submitted to the director in writing, and, if timely submitted, will be considered as part of the director's review and approval. The director shall complete the review of the annual plan (and any amendments) within 45 days of receipt, and shall either approve the annual plan or provide the operator with a list of deficiencies. The annual plan shall comply with the provisions of this subsection, and shall include the following:...	The 2018 Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan (Plan) was submitted to the County in November 2017 and was approved on 2/22/18.



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82	E.26.c SA 1	1. Slant Drilling. a. Deep Zone Wells. b. Mid-Zone Wells. c. Shallow Wells. d. Supplement Review. e. Definitions f. Environmental Consideration. g. Non-interference.	The 2017 Drilling Plan did not included any Deep zone or Mid zone wells that would be subject to a supplement review.
83	E.26.d	Drill Rig Engines. All engines used for drilling and re-drilling operations shall be operated by muffled internal-combustion engines or by electric motors.	No drilling or re-drilling activities occurred in 2017.
84	E.26.e	Fire Safety Regulations. All drilling, re-drilling, and reworking shall be in conformance with applicable fire and safety regulations.	No drilling or re-drilling activities occurred in 2017.
85	E.26.f SA 6	E. 26.f: New Technology. Proven reasonable and feasible technological improvements which are capable of reducing the environmental impacts of drilling and re-drilling shall be considered as they become, from time to time, available. SA 6: Clean Technology Assessment. The CSD requires PXP to consider proven reasonable and feasible technological improvements which are capable of reducing the environmental impacts of drilling and re-drilling. (County Code section 22.44.142.E.26.f) The CSD also requires that the Annual Drilling Plan include a discussion of the latest equipment and techniques that are proposed for use as part of its drilling and re-drilling program to reduce environmental impacts. (County Code section 22.44.142.E.26.c.ix) Pursuant thereto, PXP shall address in each Annual Drilling Plan the availability and feasibility of the use of natural gas-powered drill rigs or other technology capable of reducing environmental impacts, for the drilling of wells proposed in the Annual Drilling Plan (collectively " Clean Technology"). During the Periodic Review provided in 22.44.142 G.7, the County will evaluate such technology for brand new equipment that PXP intends to lease, acquire or otherwise use and require PXP to implement such technology to the extent the technology is feasible and available on a commercially reasonable basis.	New technology for reducing the environmental impacts of drilling and re-drilling is discussed in the annual drilling plans required per E.26.c. The discussion includes an applicability overview of electric rigs, coil tubing rigs, diesel, electric rigs, and natural gas-electric rigs along with the potential feasibility of their use at the Inglewood Oil Field.
86	E.26.g	Derricks and Portable Masts. All derricks and portable masts used for drilling, re-drilling, and reworking shall meet the standards and specifications of the American Petroleum Institute as they presently exist or as may be amended.	No drilling or re-drilling activities occurred in 2017.
87	E.26.h	Equipment Removal. All drilling and re-drilling equipment shall be removed from the site within 90 days following the completion of drilling or re-drilling activities unless the equipment is to be used at the oil field within five days for drilling or re-drilling operations.	No drilling or re-drilling activities occurred in 2017.
88	E.26.i	Drill Site Conditions. All drilling sites shall be maintained in a neat and orderly fashion.	No drilling or re-drilling activities occurred in 2017.
89	E.26.j	Belt Guards. Belt guards shall be required over all drive belts on drilling, re-drilling, and reworking equipment. Guarding shall be as required by Title 8 of the California Code of Regulations, section 6622, or as may be subsequently amended.	No drilling or re-drilling activities occurred in 2017.
90	E.26.c.x G.7 (2015)	E.26.c.x: The annual plan shall include the following: A topographic vertical profile showing proposed location of new wells that reflects local terrain conditions and that addresses the potential visibility of existing and proposed wells and other production facilities from residential and recreation areas. G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that the consideration of "considering removing the subject figures/maps from the Annual Drilling Plan until the information is deemed useful for inclusion in future plans."	The 2018 Drilling Plan was submitted in November 2017 and approved on 2/22/18. There were no new wells drilled in 2017 nor are there currently any new wells proposed for 2018
91	E.27.a	Limits on Processing Operations. Unless otherwise expressly required by DOGGR, the only processing operations permitted at the well site shall be the dehydration of oil and gas produced from the well; the storage, handling, recycling, and transportation of such materials; and those processing operations required for water injection purposes.	In 2017, the only processing that occurred at the oil field was associated with the dehydration of oil and gas; the storage, handling, recycling, and transportation of those materials; and water injection operations.
92	E.27.b	Refining. No refining shall be conducted within the oil field.	In 2017, no refining occurred within the oil field.
93	E.27.c	Well Pump Motors. All well pumping units shall be operated by electric motors.	In 2017, all well pump motors at the oil field were powered electrically.





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94	E.27.d	Well Pumps. Downhole submersible pumps and low-profile pumping units for production wells must be used wherever feasible.	In 2017, downhole submersible pumps and low-profile pumping units for production wells were used wherever feasible.
95	E.27.e	Removal by Pipeline Only. All oil, gas, and other hydrocarbons produced from any well in the oil field shall be shipped and transported through pipelines, except in case of an emergency or when access to a pipeline becomes unavailable. Excluded from this requirement are propane and other related natural gas liquids that are in amounts in excess of what can be blended into the pipeline. Should any pipeline through which oil or gas is currently transported become unavailable for the safe transportation of said products due to maintenance problems with the pipeline, or lack of sufficient capacity within the pipeline to handle the volume of oil and gas needing transportation, or because the owner or operator of such pipeline elects to discontinue transporting oil or gas through such pipeline, then the operator shall within 180 days of the date the existing pipeline becomes unavailable, seek to acquire a private right of way or easement, or shall file an application for a right of way, easement, encroachment permit, or franchise for the construction of a replacement pipeline and shall diligently prosecute such application until such pipeline is completed. During any emergency situation, or during such time as any existing pipeline becomes unsafe or unavailable, oil and gas may be transported by truck until the emergency situation is resolved or until a replacement pipeline shall be permitted and constructed in compliance with all applicable laws and regulations.	In 2017, all oil, gas, and other hydrocarbons produced in the oil field were shipped and transported via pipelines, and all natural gas liquids were blended into the oil and transported by pipeline.
96	E.27.f	Pipelines. The operator shall comply with the following provisions: i. New pipelines that remove oil or gas from the oil field shall be buried below the surface of the ground; ii. All pipelines which are not enclosed within a fence shall be placed underground or covered with materials approved by the fire chief. Said covers shall be maintained in a neat, orderly, and secure manner; iii. Any and all water or brine produced during pipeline construction shall either be injected in accordance with DOGGR requirements, or disposed of in accordance with other local, state or federal regulations; iv. New pipeline corridors shall be consolidated with existing pipelines or electrical transmission corridors where feasible; and v. Upon completion of pipeline construction, the site shall be restored to the approximate previous grade and condition.	No new pipelines that transport oil or gas from the oil field have been constructed since the adoption of the CSD. The oil field is completely fenced in with chain link fencing that meets the DOGGR requirements, thus all oil field pipelines are also enclosed by a fence. All water or brine generated at the oil field is injected in accordance with DOGGR requirements. Pipeline construction within the oil field is consolidated to the maximum feasible in existing pipeline routes and corridors.
97	E.27.g	Active Pipeline Plot Plan. The operator shall submit to the fire chief a plot plan depicting the approximate location of all active pipelines regulated by the United States Department of Transportation or California State Fire Marshall owned by the operator that are located outside the outer boundary line, including waste water, and trunk and gathering lines to transport oil or petroleum products. The plot plan shall be submitted within 30 days of the installation of any new pipelines or the relocation of an existing pipeline.	The active pipeline plot plan was submitted to the Fire Department on December 9, 2009 and has not been required to be updated to date.
98	E.27.h	Machinery Enclosures. The operator shall maintain enclosures around machinery with moving parts consisting of a fence, screening, or housing. Said enclosures shall be installed in compliance with Section 11.16.020, Title 11 of the County Code.	In 2017, all enclosures around machinery subject to this provision were maintained in compliance with Section 11.16.020, Title 11 of the County Code.
99	E.27.i	Opening Protections. The operator shall cap, close, or protect the openings in all oil wells, test holes, and similar excavation in compliance with Section 11.54.010, Title 11, of the County Code.	In 2017, all openings in all oil wells, test holes, and similar excavation in compliance were capped, closed, or protected in compliance with Section 11.54.010, Title 11, of the County Code.
100	E.28.a	a. DOGGR Regulations. The operator shall comply with all DOGGR regulations related to well reworking operations.	In 2017, all DOGGR regulations related to well reworking operations were complied with.
101	E.28.b G.7 (2015)	E.28.b: Number of Reworking Rigs. No more than eight reworking rigs shall be present within the oil field at any one time, unless an emergency condition requires additional Reworking rigs. This does not include equipment used for well maintenance or well abandonment. G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "the Operator facilitate better coordination when scheduling reworking and the other types of rigs at the oil field to avoid concentrating too many rigs in one area.	In 2017, no more than four reworking rigs were present on the oil field at any one time not including equipment used for well maintenance and well abandonment. In 2017 SPR has ensured that reworking rigs are not overconcentrated in one area.



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102	E.28.c	Hours of Operation. With exception of emergencies, well reworking operations shall not be allowed after 7:00 p.m. or before 7:00 a.m., nor on Sundays or legal holidays.	In 2017, reworking rigs did not operate outside 7:00 am to 7:00 pm or on Sundays or legal holidays except in emergencies.
103	E.28.d	Specifications. Reworking rigs shall meet the standards and specifications of the American Petroleum Institute.	In 2017, all reworking rigs met the standards and specifications of the American Petroleum Institute.
104	E.28.e	Equipment Removal. Reworking rigs shall be removed from the oil field within seven days following the completion of reworking operations unless such rig will be used on another well at the oil field within five days.	In 2017, all reworking rigs were removed from the oil field within seven days following completion of the operations unless it was scheduled for use at another well within five days.
105	E.29.a	New Tank Specifications. All new tanks and appurtenances shall be designed, constructed, installed, and maintained in accordance with current County Fire Code, American Petroleum Institute, DOGGR, California Division of Industrial Safety, Environmental Protection Agency Standards, applicable provisions of Title 14 of the California Code of Regulations section 177 4, and applicable CalARP Program requirements.	No new tanks were constructed in 2017.
106	E.29.b	Setbacks. No new storage Tank, excluding a replacement tank, shall be constructed closer than 500 feet from any developed area, or closer than 200 feet from a public road. No building shall be constructed within 50 feet of any oil storage tank.	No new tanks were constructed in 2017. No new buildings were constructed within 50 feet of any oil storage tank in 2017.
107	E.29.c	Vapor Recovery. Oil, wash, and produced water tanks shall be vapor tight and shall be equipped with a vapor recovery system.	In 2017, all oil, wash and produced water tanks were vapor tight and equipped with a vapor recovery system.
108	E.29.d	Specifications for New Tank Piping, Valves, Fittings, and Connections. All new tank piping, valves, fittings, and connections including normal and emergency relief venting, shall be installed and maintained in accordance with current American Petroleum Institute standards to the satisfaction of SCAQMD and DOGGR.	In 2017, all equipment covered by this provision were installed and maintained in accordance with current API standards to the satisfaction of SCAQMD and DOGGR.
109	E.29.e	Detection of Tank Bottom Leaks. The operator shall design, implement, and comply with a program, approved by the fire chief, for controlling and detecting tank bottom leaks on all tanks at the oil field. The operator may use a combination of methods including but not limited to diversion walls, dikes, tank foundations of concrete or gravel, and a tank bottom leak detection system in compliance with Title 14 of the California Code and Regulations section 1773, or subsequently enacted state regulations regarding tank bottom leaks.	All tanks at the Inglewood Oil Field have a program to detect tank bottom leaks as approved by the Fire Department on 2/18/10 in the Tank Leak Detection and Containment Plan.
110	E.30	Well and Production Reporting. The operator shall deliver annual production reports to the director and the fire chief. The reports shall provide the following information: a. A copy of all DOGGR Forms 110 and 110B submitted during the previous 12 months. b. Number and mapped location of wells drilled or redrilled, including well identification numbers. c. Number and mapped location of water injection wells, including well identification numbers. d. Number and mapped location of idled wells, including well identification numbers and the date each well was idled. e. Number and mapped location of abandoned wells, including date each well was abandoned and/or re-abandoned. f. Any additional information requested by the director or the fire chief.	The 2017 well and production reporting will be submitted to the DRP and Fire Chief in March 2018.
111	E.31	Idle Well Testing and Maintenance. The operator shall comply with Title 14 of the California Code of Regulations section 1723.9 regarding testing and maintenance of idle wells, or subsequently enacted state regulations regarding testing and maintenance of idle wells. The operator shall carry out all additional tests, remedial operations, and mitigation measures required by DOGGR if any idle wells do not meet the test standards.	In 2017, all required testing and maintenance of idle wells was carried out in accordance with all applicable regulations.
112	E.32	Abandoned Well Testing. The operator shall conduct annual hydrocarbon vapor testing of areas within the oil field that contain abandoned wells. The testing shall be done using a soil gas vapor probe, or another method approved by the director. The results of the testing shall be submitted to the director and DOGGR on an annual basis. Abandoned wells that are found to be leaking hydrocarbons that could affect health and safety shall be reported to the director and DOGGR within 24 hours of the abandoned well test. If directed by DOGGR, the operator shall re-abandon the well in accordance with DOGGR rules and regulations. If the test results for an abandoned well area are at or below the background levels for two consecutive years that area shall thereafter be tested every five years.	The 2017 abandoned well testing was submitted to the DRP and DOGGR on 10/27/17.



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#	CSD Section/ Plan	CSD Language	Compliance Description
113	E.33	<p>Well and Well Pad Abandonment. If DOGGR orders the operator to plug and abandon any wells on the oil field, the operator shall deliver to the fire department, on a timely basis, all notices of intent to plug and abandon a well that the operator files with DOGGR and shall commence promptly and proceed diligently with the plugging and abandonment operations in accordance with DOGGR rules and regulations and the terms of the DOGGR permit to plug and abandon the well. Well abandonment may commence once all necessary permits and approvals are obtained. If the well pad associated with the abandoned well does not contain other production, injection, or idle wells, and will not be used for future drilling, then the operator shall promptly abandon the well pad consistent with the following provisions:</p> <p>Closure of Sumps. The operator shall clean out all sumps, cellars, and ditches, and level and fill all sumps and depressions pursuant to DOGGR requirements. If sumps are lined with concrete, bottoms and walls shall be broken up and removed. Sumps shall be closed in accordance with Regional Water Quality Control Board and California Department of Toxic Substances Control requirements.</p> <p>b. Well Pad Site Cleanup. The operator shall leave the site entirely free of oil, rotary mud, oil-soaked earth, asphalt, tar, concrete, litter, debris, and other substances to the satisfaction of DOGGR and in compliance with federal requirements.</p> <p>c. Contaminated Materials. All contaminated soils and materials within the well pad boundaries shall be removed and treated or disposed of in accordance with all local, county, State, and federal regulations.</p> <p>d. Well Pad Revegetation. The Well pad shall be revegetated following the requirement of the native habitat restoration plan.</p>	<p>DOGGR has not ordered any wells to be plugged or abandoned pursuant to this requirement. The oil field does not contain any sumps and sumps are no longer used at the oil field. Existing well pads have been cleaned up but are not scheduled for abandonment or restoration so they may be re-used to avoid the impact of developing new well pad areas.</p>
114	E.34	<p>County Request for Review of Well Status. The director may periodically review the status of the operator's wells and submit to DOGGR a list of wells the director believes should be plugged and abandoned as specified in Public Resources Code section 3206.5 or any subsequently enacted state law related to a local jurisdiction's right to request state-agency review of idle wells.</p>	<p>The County has not requested that DOGGR require the Operator to plug or abandon any wells pursuant to this provision.</p>
115	E.35 SA 14	<p>E.35: Reduced Throughput Triggering Review. When oil or gas throughput is less than 630 barrels per day, the director shall conduct a public hearing to determine if shut down of the oil field or other action are appropriate.</p> <p>SA 14: CSD Review Based On Reduced Production. When production drops to three percent of the estimated peak production of 21,000 barrels of oil per day, the County will review the CSD to consider whether modifications or closure of the Oil Field is necessary or appropriate or at such earlier date as the County determines appropriate.</p>	<p>The oil field has not reached the production levels that trigger this review and this provision has not been activated to date.</p>
116	E.36	<p>Abandonment Procedures. Within 180 days of permanent facility shut down, the operator shall submit an abandonment plan to DOGGR and submit to the director for review and approval a time line for facility removal, site assessment, and remediation as necessary. The operator shall begin abandonment of the site no later than 20 days after the director's approval of the timeline, and shall provide to the director quarterly updates on the abandonment process until such time as the oil field is abandoned and remediated. The operator shall post a performance bond to insure compliance with all provisions of this subsection and the operators and landowners shall continue to pay property taxes at the rates assessed during oil field operation until all site restoration work has been fully completed, as determined by the director.</p>	<p>The facility has not shut down; hence, this provision is not applicable to date.</p>



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117	F.1.a, b	<p>Environmental Quality Assurance Program ("EQAP"). The operator shall comply with all provisions of an environmental quality assurance program that has been approved by the director. The following provisions relate to the EQAP:</p> <p>a. EQAP Requirements. The EQAP shall provide a detailed description of the steps the operator shall take to assure compliance with all provisions of this section, including but not limited to, all of the monitoring programs called for by this section.</p> <p>b. Annual EQAP Reports. Within 60 days following the end of each calendar year, the operator shall submit to the director an annual EQAP report that reviews the operator's compliance with the provisions of the EQAP over the previous year and addresses such other matters as may be requested by the director. The annual EQAP report shall include the following:</p> <p>i. A complete list and description of any and all instances where the provisions of the EQAP, or any of the monitoring programs referred to therein or in this section, were not fully and timely complied with, and an analysis how compliance with such provisions can be improved over the coming year.</p> <p>ii. Results and analyses of all data collection efforts conducted by the operator over the previous year pursuant to the provisions of this section.</p>	<p>This 2017 annual EQAP report was submitted on 02/28/18 in compliance with this provision.</p>
118	F.1.c	<p>EQAP Updates. The EQAP shall be updated as necessary and submitted to the director for approval along with the annual EQAP report. The EOAP updates shall be provided to the CAP and MACC for review and comment. Comments from the CAP and MACC, if timely received, shall be considered by the director before making a decision to approve the same. The director shall complete the review of EQAP updates as soon as practicable, and shall either approve the updated EOAP or provide the operator with a list of specific items that must be included in the EOAP prior to approval. The operator shall respond to any request for additional information within 30 days of receiving such request from the director, unless extended by the director.</p>	<p>The EQAP was approved by the County in February 2009 and was revised on August 25, 2009. No updates have been necessary to date.</p>
119	F.2	<p>Environmental Compliance Coordinator. The operator shall recommend and fund the environmental compliance coordinators. The number of environmental compliance coordinators shall be determined by the county and shall take into account the level of oil operations at the oil field. The environmental compliance coordinator(s) shall be approved by, and shall report to, the director. The responsibilities of the environmental compliance coordinator(s) shall be set forth in implementation guidelines that may be developed by the county for the oil field and shall generally include:</p> <p>a. On-site, day-to-day monitoring of construction or drilling and redrilling activities as determined by the director.</p> <p>b. Taking steps to ensure that the operator, and all employees, contractors, and other persons working in the oil field, have knowledge of, and are in compliance with all applicable provisions of this section.</p> <p>c. Evaluating the adequacy of drilling, redrilling, and construction impact mitigations, and proposing improvements to the operator or contractors and the county.</p> <p>d. Reporting responsibilities to the various county agencies with oversight responsibility at the oil field, as well as other agencies such as DOGGR, and SCAQMD.</p>	<p>An ECC position has been funded by the operator as required by this provision since the adoption of the CSD. The ECC site inspections are coordinated with oil field management to gain access to oil field staff, oil field contractors and for access to the oil field to check on the compliance provisions of the CSD. The ECC also participates in reviewing and commenting of all plans submitted by the Operator in compliance with the CSD.</p>
120	F.3.a	<p>Safety Inspection, Maintenance, and Quality Assurance Program ("SIMQAP"). The operator shall comply with all provisions of a safety inspection, maintenance, and quality assurance program that has been approved by the director and the fire chief.</p> <p>a. SIMQAP Requirements. The SIMQAP shall, at a minimum provide for:</p> <p>i. Inspection of construction techniques;</p> <p>ii. Regular maintenance and safety inspections;</p> <p>iii. Periodic safety audits;</p> <p>iv. Corrosion monitoring and leak detection; and</p> <p>v. Inspections of all trucks carrying hazardous and/or flammable material prior to loading.</p>	<p>The SIMQAP was approved on 4/13/11. The Revised SIMQAP was approved by LA County Fire Department on 6/8/16, is implemented and ongoing.</p>



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121	F.3.b	SIMQAP Updates. The operator shall periodically review and revise the SIMQAP to incorporate changes in procedures, and new safety and maintenance technologies and procedures. The operator shall make such revisions at least every five years, or more frequently, if the operator determines changes are necessary or if requested by the director or the fire chief. The operator shall submit SIMQAP updates to the director and the fire chief for their review and approval. The director shall complete the review of SIMQAP updates as soon as practicable, and shall either approve the updated SIMQAP or provide the operator with a list of specific items that must be included in the SIMQAP prior to approval. The operator shall respond to any request for additional information within 30 days of receiving such request from the director, unless extended by the director.	The SIMQAP was approved on 4/13/11. The Revised SIMQAP was approved by LA County Fire Department on 6/8/16, is implemented and ongoing.
122	F.3.c	Worker Notification. The operator shall ensure that all persons working on the oil field comply with all provisions of the currently approved SIMQAP.	All persons working on the oil field in 2017 received SIMQAP training.
123	F.3.d	Inspections. The SIMQAP shall provide for involvement of county staff or the environmental compliance coordinator in all inspections required by this section.	The approved SIMQAP provides for the involvement of County staff or the ECC in all required inspections.
124	F.4	Annual Emergency Response Drills of the County and Culver City Fire Departments. The operator shall demonstrate the effectiveness of the emergency response plan by responding to one planned emergency response drill per year which shall be conducted in conjunction with the county and Culver City fire departments. Emergency response drills required by other agencies that involve the county and Culver City fire departments can be used to satisfy this provision. In addition, the operator shall demonstrate the effectiveness of the emergency response plan by responding to not more than two unannounced drills each year which may be called by the county fire department at the oil field. If critical operations are then underway at the oil field, the operator need not respond to a unannounced drill to the extent such a response would, as a result of such critical operations, create an undue risk of personal injury or property damage, but in such case the operator must promptly explain the nature of the critical operations, why response is not possible, and when the critical operations will be completed.	The 2017 emergency response drill was conducted on June 29, 2017. Representatives from both LA County and Culver City Fire Departments representatives attended. The County ECC and representatives from the California Department of Fish and Wildlife also attended and participated in the drill.
125	F.5	Noise Monitoring. The public health department shall retain an independent qualified acoustical engineer to monitor ambient noise levels in the areas surrounding the oil field as determined necessary by the director or the director of public health. The monitoring shall be conducted unannounced and within a time frame specified by the director or the director of public health. Should noise from the oil operations exceed the noise thresholds specified in this section, no new drilling or redrilling permits shall be issued by the county until the operator in consultation with the director and director of public health identifies the source of the noise and the operator takes the steps necessary to assure compliance with thresholds specified in this section. The results of all such monitoring shall be promptly posted on the oil field web site and provided to the CAP.	No exceedances of the noise regulations in the County Code or of the noise limits specified subsection E.5.a of the CSD have been reported to SPR by the DPH.
126	F.6	Vibration Monitoring. The public health department shall retain an independent qualified acoustical engineer to monitor vibration in the areas surrounding the oil field as determined necessary by the director or the director of public health. The monitoring shall be conducted unannounced and within a time frame specified by the director or the director of public health. Should vibration from the oil operations exceed the vibration thresholds specified in this section, no new drilling or redrilling permits shall be issued by the county until the operator in consultation with the director and director of public health identifies the source of the vibration and the operator takes the steps necessary to assure compliance with thresholds specified in this section. The results of all such monitoring shall be promptly posted on the oil field web site and provided to the CAP. A telephone number by which persons may contact the operator at all times to register complaints regarding oil operations shall be posted in the main entrance sign to the facility and included in the annual newsletter required by subsections J.2.b and on the oil field web site required by subsection J.2.c.	No exceedances of the vibration criteria specified in subsection E.6. of the CSD have been reported to SPR by DPH.





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127	F.7	Complaints. All complaints related to oil operations received by the operator shall be reported on the same business day to the environmental compliance coordinator and to the director. In addition, the operator shall maintain a written log of all complaints and provide that log to the director, the MACC, and CAP on a quarterly basis. Depending upon the nature of the complaint, the operator shall report the complaint to the SCAQMD, DOGGR, and any other appropriate agencies with oversight authority regarding the complaint at issue. If the complaint is received after normal business hours, it shall be reported to the environmental compliance coordinator and the agencies at the opening of the next business day.	All complaints received were reported to the ECC, DRP as well as other appropriate agencies with oversight of the matter in compliance with the timing of this policy. Quarterly complaint logs were submitted to the ECC and the DRP quarterly and are posted at <a href="http://www.inglewoodoilfield.com">www.inglewoodoilfield.com</a> .
128	G.1	Costs of Implementing Monitoring and Enforcing Conditions. The operator shall be fully responsible for all reasonable costs and expenses incurred by the county or any county contractors, consultants, or employees, in implementing, monitoring, or enforcing this section, including but not limited to, costs for permitting, permit condition implementation, mitigation monitoring, reviewing and verifying information contained in reports, undertaking studies, research and inspections, administrative support, and including the fully burdened cost of time spent by county employees on such matters.	SPR has made timely payments on all CSD monitoring and enforcement costs to the County through the draw down account required by CSD Provision G.2. All costs from the implementation of the CSD, permit processing, mitigation monitoring, compliance report research, review and verification, inspections, and administrative costs have been paid by the SPR from this account.
129	G.2	Draw-Down Account. The operator shall maintain a draw-down account with the department of regional planning from which actual costs will be billed and deducted for the purpose of defraying the expenses involved in the county's review and verification of the information contained in any required reports and any other activities of the county, including but not limited to, enforcement, permitting, inspection, coordination of compliance monitoring, administrative support, technical studies, and the hiring of independent consultants. The initial amount to be deposited by the operator shall be \$500,000. In the first year, if withdrawals from the account have reduced its balance to less than 50 percent of the amount of the initial deposit (\$250,000), the operator shall deposit \$50,000 in supplemental funds within 30 business days of notification. After the first year, if the balance in the draw-down account is reduced at any time to \$50,000, the operator shall deposit \$50,000 in supplemental funds on each occasion that the account is reduced to \$50,000 or less within 30 business days of notification. There is no limit to the number of supplemental deposits that may be required. At the discretion of the operator, the amount of an initial or supplemental deposit may exceed the minimum amounts specified in this subsection. The director may, from time to time, increase the minimum \$50,000 figure to account for inflation or the county's experience in obtaining funds from the account.	The draw-down account has been maintained at or above the \$50,000 balance as required by this requirement. The only deposit to the account in 2017 occurred on 04/25/17.
130	G.3	Indemnification. The operator shall enter into an agreement with the county to indemnify and hold harmless the county, its elected and appointed officials, agents, officers, and employees from any claim, action, or proceeding for damages arising from its oil operations, including water, air or soil contamination, health impacts, or loss of property value during the oil operations, well abandonment, and post-abandonment activities with terms approved by, and in a form acceptable to, the CEO.	The required agreement was documented in a letter signed by the operator and the County dated August 16, 2017, the agreement is on file with the County.
131	G.4	Insurance Requirements. Within 90 days following the effective date of the ordinance creating this section or such later time as may be approved by the director for good cause shown, and without limiting the operator's indemnification of the county as required in the preceding subsection, the operator shall provide evidence of insurance coverage that meets county requirements as required and approved by the CEO including identifying the county and its elected and appointed officers and employees as additional insureds. Such coverage shall be maintained so long as oil operations are conducted within the district and until such time as all abandonment requirements are met and certified by the appropriate local, state, and federal agencies. Such insurance coverage shall include but is not necessarily limited to the following: general liability, auto liability, professional liability, and environmental impairment liability coverage insuring clean-up costs and endorsing for 'Sudden and Accidental contamination or pollution. Such coverage shall be in an amount sufficient to meet all applicable state and federal requirements, with no special limitations. At the operator's request and only with county approval by the CEO, the operator may self-insure all or any part of the above coverage obligations in lieu of purchasing commercial coverage. These insurance requirements shall be in addition to all other indemnification, insurance and performance security required by federal, state, and local regulations and permits.	PXP, the operator at the time of CSD adoption, provided the County with an insurance policy meeting the liability and environmental impairment liability requirements of this provision on January 18, 2010. SPR updated this insurance to reflect the change in operator on January 18, 2018.



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132	G.5.a	Performance Bond. Prior to issuance of the first drilling or redrilling permit pursuant to this section, the operator shall provide to the department of regional planning a faithful performance bond or financial instrument in the sum to be determined by the CEO, payable to the county and executed by a corporate surety acceptable to the county and licensed to transact business as a surety in the state of California. Such bond shall be conditioned upon the faithful performance by the operator of duties related to well abandonment, site restoration, and environmental cleanup and shall be in a format and include terms approved by the CEO.	SPR obtained Performance Bond No. B010359 for the benefit of Baldwin Hills Community Standards District of the County of Los Angeles, as Obligee with the Executed Date of December 14, 2016 and Effective Date of Change of November 3, 2017.
133	G.5.b	Change of Operator. The performance bond shall continue in force for one year following any sale, transfer, assignment, or other change of operator of the oil field, or of the current operator's termination of activities at the oil field. The county may release said bond prior to the end of the one-year period upon satisfaction by the operator of all its obligations. Notwithstanding the foregoing, the performance bond shall not be terminated or released upon the sale, transfer, assignment, or other change of operator until the new operator has delivered a replacement bond complying with the provisions of this subsection G.	It is SPR's understanding that this bond is based upon anticipated end of life remaining liabilities that may be present. This bond exceeds the liability of remediation cost analyses and should be adequate to provide the necessary coverage.
134	G.5.c	Funding Options. At its sole option, the county may accept certificates of deposit, cash deposits, or U.S. government securities in lieu of commercial bonds to meet the above bonding requirements on terms approved by the CEO.	This provision is not applicable since SPR provided a performance bond in accordance with G.5.a.
135	G.6	Other Obligations. The insurance, indemnification, and performance security requirements in subsections G.3, G.4, and G.5 shall be in addition to all other indemnification, insurance, and performance security required by federal, state and local regulations, and permits.	The condition is administrative in its intent and is fully implemented.
136	G.7	<p>Periodic Review. The county shall conduct a comprehensive review of the provisions of this section at least every five years to determine if the provisions of this section are adequately protecting the health, safety, and general welfare. Such reviews shall, among other things, consider whether additional provisions should be added, appended, or removed. One of the main goals of the periodic review shall be to evaluate if proven technological advances that would further reduce impacts of oil operations on neighboring land uses should be incorporated into the provisions of this section.</p> <p>a. Review Requirements. Each review shall include a report by a hearing officer designated by the director, which shall be prepared after public notice and an opportunity for public comment. The report shall include a comprehensive analysis of the effectiveness of this section, and shall review and consider enforcement activity, operational records, and any other issues relating to oil operations. The report, at the option of the county, may include a survey of residents near the oil field regarding noise, odors, vibrations, and other issues requested by the director of public health. A draft of the report shall be provided to the CAP and the operator for review and comment. All comments on the draft report from the CAP and the operator shall be submitted to the hearing officer in writing, and will be considered, if timely received, before the report is finalized. The final report by the hearing officer shall include a recommendation as to whether the director should prepare proposed amendment to this section for submission to the board of supervisors.</p> <p>b. Early Reviews. At the discretion of the director, reviews of this section may be conducted more frequently than every five years. Without limiting such discretion, the director shall consider whether an early review should be undertaken if more than three material violations occur within any 12-month period.</p> <p>c. Initial Review. The initial review shall occur no sooner than three years and no later than five years after the effective date of the ordinance establishing this section unless the director determines that such initial annual review shall occur at an earlier time pursuant to subsection b, above.</p>	The County released a five year review report in February 2014. The draft report was circulated for review and comment to both the CAP, members of the public, other agencies and the operator. Comments on the draft report were considered in the preparation of the administrative final draft released on 06/25/15. The administrative final draft was discussed at the July 2015 CAP meeting, and on 09/24/15, the final draft was issued. The report was prepared consistent with the five year time frame requirement stipulated in CSD Provision G.7.c. On 10/28/15, Los Angeles County DRP issued a letter to FM O&G verifying the conclusion of the Periodic Reivew Final Report dated September 2015 that the provisions of the CSD have been effective and that no modification to the current language of the CSD is recommended.



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137	G.8	<p>Multiple Agency Coordination Committee ("MACC"). A MACC shall be established to coordinate activities and communications between the various agencies with regulatory authority over the oil operations within the district. While each agency will continue to make its own decisions with regard to their respective areas of authority, the MACC will allow for collection and analysis of data and for discussion of both strategic evaluations and enforcement actions taken by the various agencies at the oil field.</p> <p>a. MACC Members. The director shall establish a MACC that includes representatives from the following agencies: the county department of regional planning, the county fire department, the county department of public works, and the county department of public health. The SCAQMD, the Regional Water Quality Control Board, DOGGR, and Culver City fire department shall be invited to appoint a representative from their agency as a member of the MACC.</p> <p>b. MACC Chair. The director or his designee shall chair the MACC meetings and shall coordinate all MACC activities including scheduling and keeping minutes of MACC meetings.</p> <p>c. MACC Meetings. The MACC shall determine its meeting schedule.</p> <p>d. Documents Provided to the MACC. Copies of all monitoring and compliance reports, plans, and other documents that are requirements of this section shall be submitted to the MACC.</p>	<p>A MACC was established in 2009, and the MACC conducts periodic meetings. All monitoring and compliance reports are provided to the MACC.</p>
138	G.9	<p>Related County Code Provisions. The county code contains a number of provisions related to oil wells and oil field operations. Where the regulations of this section differ from any other provisions in the county code, these regulations shall supersede unless the contrary provisions are mandated by state law.</p>	<p>The provision is a standard County requirement to clarify jurisdiction on similar code and regulations.</p>
139	H.1 SA 4	<p>H.1: Director's Review Required. The operator shall apply for and receive approval of a director's review pursuant to the provisions of Part 12 of Chapter 22.56 prior to any new drilling and redrilling. New drilling and redrilling approved through a director's review procedure shall be limited to no more than 53 wells per year, with the maximum number of newly drilled wells of that total, limited to 45 per year, except that during the first year following the effective date of the ordinance establishing this section, new drilling and redrilling shall be limited to no more than 24 wells. Approval through director's review for drilling new wells shall be limited to 600 wells over 20 years, beginning on the effective date of this ordinance. Drilling and redrilling shall be planned to avoid over concentration of such activities in one area in any one year, if near developed areas. The director's review procedures shall also apply to emergency actions determined by the director as necessary to prevent an imminent hazard, or to other immediate measures required for the purposes of protecting health and safety. No new permits for drilling or redrilling shall be approved by the director unless the subject wells have been approved as part of an annual drilling plan as described in subsection E.26.c. Approval shall not be granted until copies of all related permits have been submitted to the director; other permits include, but are not limited to, the permits required by DOGGR, the county fire department; the county department of public works, the county sanitation district, RWQCB, SCAQMD, and other pertinent agencies identified by the director.</p>	<p>No new drilling or redrilling occurred in 2017.</p>





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140	H.1 SA 4	<p>SA 4: Number of wells. Notwithstanding the aggregate and annual well-drilling limits in the CSD, PXP shall comply with the following limits:</p> <p>a. Notwithstanding Section 22.44.142.H of the CSD, no more than 500 new wells (inclusive of Bonus Wells and wells drilled since approval of CSD) shall be drilled pursuant to the CSD (hereinafter "Director's Review") through October 1, 2028, or during the remaining life of the CSD, whichever is later.</p> <p>b. Until such time as PXP has drilled or redrilled 50 wells since the adoption of the CSD, or 24 months from the date of this Agreement, whichever is sooner ("Time Period One"), no more than 30 wells may be drilled or re-drilled in any calendar year pursuant to a Director's Review as set forth in the CSD (hereinafter Director's Review). At the end of Time Period One, and if the County determines, pursuant to its review of the CSD by the Director of Regional Planning, that the CSD has been effective in protecting the health, safety, and general welfare of the public, thereafter (the "Full Operational Period") no more than 35 wells may be drilled or re-drilled in the calendar year pursuant to Director's Review.</p> <p>c. In Time Period One, for each well abandoned within 800 feet of any Developed Area (the "800-foot zone") by PXP since adoption of the CSD and in full compliance with the California Department of Conservation's Division of Oil, Gas and Geothermal Resources ("DOGGR") standards for abandonment at the time of abandonment, PXP may drill two additional new wells outside of the 800-foot zone (hereinafter "Bonus Wells"), up to a maximum of 45 drilled and redrilled wells (30 wells plus 15 Bonus Wells) in any calendar year within Time Period One pursuant to Director's Review and subject to review and approval in the Annual Drilling Plan. Subject to the annual and aggregate limits on number of wells, Bonus Wells earned by abandonment may be drilled at any time during the life of the CSD.</p> <p>d. In the Full Operational Period, for each well abandoned within the 800-foot zone, PXP may drill two additional new wells outside the 800-foot zone up to a maximum of 53 drilled and re-drilled wells (35 wells plus 18 Bonus Wells) in that year pursuant to Director's Review and subject to review and approval in the Annual Drilling Plan. Subject to the aggregate and annual limits on number of wells, Bonus Wells earned by abandonment may be drilled at any time during the life of the CSD.</p> <p>e. The Developed Area as used in the CSD with respect to the 400-foot buffer zone (Section 22.44.142.E.) shall remain unchanged (static or fixed) from what it was determined to be on the effective date of the CSD.</p>	<p>Since inception of the CSD and following the installation of 50 new wells, the Settlement Agreement allows SPR to apply to the County for approval to install up to 35 new wells per year. SPR's predecessor applied for this well increase on 10/10/2011 and was granted approval by the County on 12/12/2011.</p> <p>Since inception of the CSD through 6/30/2014, 127 wells have been drilled and 32 wells have been abandoned; of which 20 were within 800 feet of Developed Areas.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="3" style="text-align: left;"><b>Number of Wells Drilled Since Inception of the CSD</b></th> </tr> <tr> <th style="text-align: left;">YEAR</th> <th style="text-align: left;">NUMBER OF WELLS</th> <th style="text-align: left;">BONUS WELLS USED</th> </tr> </thead> <tbody> <tr><td>2009</td><td style="text-align: center;">0</td><td style="text-align: center;">0</td></tr> <tr><td>2010</td><td style="text-align: center;">19</td><td style="text-align: center;">0</td></tr> <tr><td>2011</td><td style="text-align: center;">40</td><td style="text-align: center;">5</td></tr> <tr><td>2012</td><td style="text-align: center;">20</td><td style="text-align: center;">0</td></tr> <tr><td>2013</td><td style="text-align: center;">30</td><td style="text-align: center;">0</td></tr> <tr><td>2014</td><td style="text-align: center;">18</td><td style="text-align: center;">0</td></tr> <tr><td>2015</td><td style="text-align: center;">0</td><td style="text-align: center;">0</td></tr> <tr><td>2016</td><td style="text-align: center;">0</td><td style="text-align: center;">0</td></tr> <tr><td>2017</td><td style="text-align: center;">0</td><td style="text-align: center;">0</td></tr> <tr> <td><b>Total</b></td> <td style="text-align: center;"><b>127</b></td> <td style="text-align: center;"><b>5</b></td> </tr> </tbody> </table>	<b>Number of Wells Drilled Since Inception of the CSD</b>			YEAR	NUMBER OF WELLS	BONUS WELLS USED	2009	0	0	2010	19	0	2011	40	5	2012	20	0	2013	30	0	2014	18	0	2015	0	0	2016	0	0	2017	0	0	<b>Total</b>	<b>127</b>	<b>5</b>
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141	H.2 - 3	<p>H.2: Conditional Use Permit Required. Provided a conditional use permit has first been obtained as provided in Part 1 of Chapter 22.56, and while such permit is in full force and effect in conformity with the conditions of such permit, the following uses may be established:</p> <p>a. Drilling or redrilling that exceeds the maximum number allowed pursuant to a director's Review;</p> <p>b. Steam drive plant; and</p> <p>c. New tanks with a capacity of greater than 5,000 barrels.</p> <p>H.3: Conditional Use Permit Requirements. For those uses requiring a conditional use permit, in addition to the requirements of Part 1 of Chapter 22.56, the applicant shall substantiate to the satisfaction of the hearing officer that:</p> <p>a. The requested use is in compliance with the provisions of this section; and</p> <p>b. All reasonable measures were taken to reduce and minimize potential impacts from the proposed operation.</p>	<p>No conditional use permits have been applied for/obtained.</p>																																				
142	H.4	<p>Application Where Violation Exists. No application required pursuant to this section shall be accepted for processing or approved where any existing use in the district is being maintained or operated by the operator or its agents in violation of any material provision of this title.</p>	<p>No violations were issued in 2017.</p>																																				



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#	CSD Section/ Plan	CSD Language	Compliance Description
143	I.1	<p>Civil Penalties and Performance Security. The operator shall be subject to a penalty for violation of any requirement of this section as determined by, and at the discretion of, the director in an amount not less than \$1,000 or more than \$1 0,000 per day per violation, but in no event, in an amount beyond that authorized by state law. For this purpose, the operator shall deposit the sum of \$100,000 in an interest-bearing trust fund with the department of regional planning within 30 days following the effective date of this section, to establish a draw-down account. A written notice of violation and the associated penalty will be sent to the operator in the event of a violation. If the noted violation is not corrected to the satisfaction of the director within the time period set forth in the notice of violation, the penalty amount cited in the notice of violation will be deducted from the account. If the violation is corrected within the time period set forth in the notice of violation, but recurs any time within a six-month period, the penalty will be deducted from the account upon each recurrence and the operator will be notified of such deduction. Once the deposit has been depleted by 50 percent of the initial amount (\$50,000), the operator shall deposit additional funds sufficient to bring the balance up to the amount of the initial deposit (\$1 00,000) within 10 business days of notification. There is no limit to the number of supplemental deposits that may be required while the operator conducts oil operations within the district. If the operator is dissatisfied with the action of the director, the operator may file an appeal with the hearing officer within 15 days after the date which notice is mailed. Upon receiving a notice of appeal, the hearing officer shall take one of the following actions.</p> <ul style="list-style-type: none"> <li>a. Affirm the action of the director;</li> <li>b. Refer the matter back to the director for further review with or without instructions; or</li> <li>c. Set the matter for public hearing and after hearing, affirm, modify, or reverse the action of the director.</li> </ul> <p>The decision of the hearing officer shall be final.</p>	<p>On 12/23/08, \$100,000 was deposited with the County in the interest-bearing trust fund required by this provision. SPR was not subject to any fees described in this provision; hence, the balance of this account has not changed with the exception of interest accumulation.</p>
144	I.2	<p>Access to Records and Facilities. As to any condition which requires for its effective enforcement the inspection of records or facilities by the county or its agents, the operator shall make such records available or provide access to such facilities upon reasonable notice from the county. The county agrees to keep such information confidential where required or permitted by law and requested by the operator in writing.</p>	<p>SPR has made records and facilities available for inspection by the County and its agents.</p>
145	I.3	<p>Right of Entry. Any officer or employee of the county of Los Angeles, or his or her duly appointed representative, whose duties require the inspection of the oil field premises shall have the right and privilege at all reasonable times, to enter upon any premises upon or from which any oil operations are being conducted for which any permit is required under this section, for the purpose of making any of the inspections pursuant to this section, or in any other ordinance of the county, or for any other lawful purpose, but for safety reasons, shall be accompanied by the operator or a designee of the operator and shall wear all appropriate personal protection equipment in accordance with the operator's established health and safety policies.</p>	<p>SPR has made the oil field open to authorized inspection.</p>



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#	CSD Section/ Plan	CSD Language	Compliance Description
146	J.1	<p>Community Advisory Panel ("CAP"). A community advisory panel shall be established by the director to foster communication about ongoing operations at the oil field and to allow the community representatives to provide input to the county and the operator.</p> <p>a. CAP Members. The CAP may include representatives of the county, the city of Los Angeles, the city of Culver City, West Los Angeles College, the operator, the landowners, and each of the major neighborhoods surrounding the oil field (including Ladera Heights, Windsor Hills, Oak Park, View Park, Culver Crest, Blair Hills, and Raintree). The operator and each of the governmental entities previously referred to may each designate a representative to the CAP. Each landowner and neighborhood organization of the surrounding communities may submit a nomination to the director for appointment to the CAP. Where there is no neighborhood organization, a community resident may make a request to the director to be appointed to the CAP. School districts with schools in the vicinity of the oil field and the lessors may make a request to the director to have a representative appointed to the CAP.</p> <p>b. CAP Meetings. The CAP shall determine its meeting schedule.</p> <p>c. Documents Provided to the CAP. A notice of availability of all monitoring and compliance reports and results, all plans, audits and studies, and any other available documents that are required by this section shall be submitted to the CAP promptly after they are prepared or otherwise available. Copies of these reports, documents, and other items shall be provided to CAP members upon request except to the extent information therein may not be legally disclosed. Prior to each CAP meeting, the county shall provide to the CAP a list of all violations of the provisions of this section that have occurred since the last CAP meeting.</p>	Documentation made available to the CAP is posted on the Inglewood Oil Field website required/described in J.2.c.
147	J.2.a G.7 (2015)	<p>J.2.a: Community Meetings. The operator shall hold community meetings on an annual basis to provide updates on oil operations.</p> <p>G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "agendas for future Community Meetings be specific to oil field operations and issues and that measures be implemented to ensure questions from the public are addressed appropriately.</p>	The 2017 annual meeting was held on 11/08/2017, and in accordance with the G.7 (2015) recommendation, the agenda was specific to oil field operations and SPR ensured that questions from the public were addressed appropriately.
148	J.2.b	<p>Newsletter. The Operator shall publish an informational newsletter annually, which shall contain updated information on oil operations including drilling, redrilling, maintenance, repair, and reworking activities and all recently granted conditional use permits or applications filed for conditional use permits for the oil field. The newsletter shall be mailed by the operator to all owners of property located within 1,000 feet of the outer boundary line; all owners of property within 1,000 feet of the perimeter of the district as shown in the records of the county assessor's office; to any person or entity who has filed a written request therefore with the director; and to neighboring cities. The operator shall also make these newsletters available on the oil field web site. The oil field web site address shall be publicized in each newsletter.</p>	The newsletter was mailed out and posted on 10/16/17.
149	J.2.c	<p>Oil Field Web Site. The operator shall maintain and update on a regular basis an oil field web site that shall include information on oil operations at the oil field, including drilling and production activities. All monitoring and compliance reports and results, plans, audits and studies, and any other available documents that are required by this section (except to the extent they contain information that may not legally be disclosed) shall be promptly posted on the Oil Field Web Site in pdf format.</p>	SPR maintains the <a href="http://www.inglewoodoilfield.com">www.inglewoodoilfield.com</a> website, which includes information on the history and future of the oil field, oil field operations, operational plans, compliance plans, community and environmental sections, and information on the CSD. The web site contains over 100 documents related to operational and compliance information with the documentation posted in pdf format as required by this policy. The web site also provides contact information and includes an interactive email system to allow for direct input to SPR and for registering for email updates on oil field activities.



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150	J.3	<p>Ombudsperson. The operator shall designate employees or authorized agents to serve as ombudspersons to respond to questions and concerns concerning the oil operations. Each ombudsperson shall be familiar with all the provisions of this section and all conditions of approval related to permits and approvals issued by the county or the State of California. It shall be the further responsibility of the ombudsperson to facilitate, to the extent feasible, the prompt resolution of any issues that may arise relating to the above-stated matters or the impacts of the oil operations. The name, title, email address, and telephone number of the ombudsperson shall be posted on the oil field web site, prominently displayed in the newsletter, distributed twice per year to the CAP and MACC, and provided to any other persons requesting such information. An ombudsperson shall be available at all times, and shall respond within one hour after an initial call. An ombudsperson shall also meet at reasonable times with interested parties in an attempt to resolve issues related to oil operations. An ombudsperson shall have authority to initiate a response on behalf of the operator in all foreseeable matters. The operator shall be required to maintain a written log of all calls to the ombudspersons registering complaints or concerns regarding oil operations or other matters. The log shall include the complainant's name, date, time, phone number, nature of complaint, and the response or resolution offered. A copy of the log shall be provided to the director, the MACC, and the CAP on a quarterly basis.</p>	<p>The ombudsperson system has been in place since the adoption of the CSD and serves as primary contact between SPR and the community. The ombudsperson contact information is included in the annual newsletters and in the agendas for CAP meetings. In addition to the ombudsperson, the oil field maintains four staff members on an on-call basis to coordinate and respond to calls from the public or regulatory agencies regarding oil field operations. SPR maintains a complaint log summarizing all calls made to the ombudsperson as required by this policy.</p>
151	Section K	<p>Modification of Development Standards.</p>	<p>No modifications to development standards has been applied for.</p>
152	Section L	<p>Implementation Provisions. This subsection identifies the various implementation plans and other requirements for initial compliance with this CSD and the time frames therefor. Except as identified below, the provisions of this section shall be complied with on the effective date of the ordinance establishing this CSD. As used in this subsection, "effective date" shall mean 30 days after the board of supervisors adopts the ordinance establishing this CSD. As soon as possible after the effective date, the department of regional planning shall develop an overall implementation plan specifying the required contents or measures for each of the plans set forth below, including the inclusion of those appropriate mitigation measures indicated as necessary by the Final Environmental Impact Report for the Baldwin Hills Community Standards District to reduce environmental impacts to less than significant levels in cases where impacts can be so reduced.</p>	<p>This subsection of the CSD lists the various implementation plans and other stipulations required for initial compliance along with a submittal schedule for the subject compliance. The schedule requirements for the plan and compliance submittals required under this provision range from 30 days to two years following the effective date of the CSD (October 28, 2008). All plans and initial requirements of this CSD subsection were completed; therefore, this requirement is no longer applicable.</p>
153	SA 5	<p>Health Assessment and Environmental Justice Study. The County shall complete a Community Health Assessment of the communities surrounding the Oil Field which shall include an Environmental Justice component by June 2012 and ensure additional assessments are completed every five to seven years throughout the life of the CSD. In future Community Health Assessments, the County Department of Public Health ("Public Health") shall review other agencies' reports regarding air quality, water quality and seismic data, where feasible, in its assessment. Public Health will analyze the information by socio-economic and demographic data to accommodate and reflect an Environmental Justice component. The Community Health Assessment shall include, but not be limited to, an analysis of cancer rates, mortality rates, birth outcomes and a survey of other pertinent health indicators. The County will consult with the CAP and the Health Working Group regarding the Community Health Assessment and consider reasonable comments by the CAP and the Health Working Group. Public Health will comply with all applicable state and federal requirements including Title VI of the Civil Rights Act of 1964 and corresponding regulations, and California Government Code Section 11135 and corresponding regulations.</p>	<p>This is a County action that was completed in July 2012.</p>
154	SA 7	<p>Electrical Distribution Study. The County will propose to Southern California Edison ("SCE") and the Los Angeles Department of Water and Power ("DWP") that a study be conducted in cooperation with SCE, DWP, the County and PXP regarding opportunities to streamline and consolidate electrical lines distributed throughout the Oil Field and that SCE and DWP each fund one-fourth of the cost of such study. PXP will fund one fourth of the cost of any such study. The County will fund one-fourth of the cost of any such study.</p>	<p>This is a County action, and it was reported that both SCE and DWP declined to participate with respect to funding the study.</p>



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#	CSD Section/ Plan	CSD Language	Compliance Description
155	SA 8	Air Quality Monitoring. Supplemental to the air monitoring required by the CSD, the County will develop and implement an air quality monitoring plan that takes into consideration review and comments from Petitioners, interested stakeholders and the public. Such air monitoring shall be designed to assess the risk of both acute and chronic exposure to air contaminants from Oil Field operations, and endeavor to determine and distinguish the source of emissions, to the extent feasible, using available and affordable monitoring technology. Such air monitoring may be performed by SCAQMD, or an independent qualified consultant selected by County, and shall be commenced within 12 months of the date of this Agreement. The protocol for the air monitoring plan shall be peer reviewed prior to commencement. The plan shall be completed, and a peer reviewed report issued, within 12 to 24 months after commencement. The County commits to spending up to \$250,000 of its own funds toward implementing the plan and shall use reasonable efforts to seek additional funding sources, if necessary, to implement the plan. PXP shall reasonably cooperate with SCAQMD, the County and/or the independent consultant regarding any and all air monitoring related to the Oil Field.	This is a County action that was completed in February 2015.
156	SA 9	Back-Up Flare. The CSD (County Code section 22.44.142.L.5.b) allows PXP to maintain its existing gas plant flare as back-up equipment at the facility's gas plant after a new flare is permitted and installed. PXP and the County agree that this provision of the CSD allows only one gas plant flare to be operated at one time at the Oil Field. PXP shall comply with said limitation of only one gas plant flare operating at one time at the Oil Field. PXP shall install and have operational the new flare within 180 days of receiving the SCAQMD permit or at such later date as approved by the Director of Regional Planning for good cause shown.	Installation of the new gas plant back-up flare was completed in 2012. The old gas plant flare remains and is maintained as a back up equipment as allowed for by CSD Provision L.5.b and the Settlement Agreement. SPR has complied with the requirement that only one flare be in operation at one time at the oil field.
157	SA 10	Well Plugs. DOGGR requires oil field operators to utilize a minimum 25-foot cement surface plug at the top of a well when abandoning any such well pursuant to Title 14 of the California Code of Regulations section 1723.5. To augment this requirement, for all wells abandoned at the Oil Field from the date of this Agreement, PXP shall utilize a total of 150-foot cement surface plug.	SPR complies with the 150 foot cement plug requirement for abandoned wells.
158	SA 13	Fracking Study. PXP shall pay for an independent consultant to conduct a study of the feasibility and potential impacts (including impacts to groundwater and subsidence) of the types of fracturing operations PXP may conduct in the Oil Field. The study will also consider PXP's historic and current use of gravel packing. Such study will be completed within twelve (12) months of the date of this Agreement. Such study and all the back-up information for such study shall be provided to a qualified peer reviewer selected by the County and PXP, who shall review the study, back-up materials, and conclusions for completeness and accuracy. PXP must provide the independent expert with all materials requested and reasonably necessary for an accurate and verifiable study. The peer reviewer will be provided with access to all the data and materials provided to the independent expert. The peer reviewer shall agree to keep all proprietary information confidential. If the peer reviewer determines that the study is materially inadequate, incomplete or inaccurate, it shall so advise PXP's consultant who will complete the study as reasonably recommended by the peer reviewer and provide the revised study to the peer reviewer within 90 days. Upon acceptance by the peer reviewer, the study and all supporting material, including comments by the peer reviewer, shall be forwarded to the County, DOGGR, the Regional Water Quality Control Board ("R WQCB"), CAP and Petitioners and be available to the public, with any proprietary information redacted.	The Hydraulic Fracturing Study – Inglewood Oil Field was completed in July 2012 with the final report dated October 10, 2012 consistent with the requirements of the Settlement Agreement. The report is available to the public on the Inglewood Oil Field web site.
159	SA 15	CSD Provisions. The CSD and all of its standards and requirements remain in full force and effect except to the extent that PXP has agreed to be limited by stricter or more rigorous controls or standards as reflected in this Agreement. Nothing herein shall limit or abrogate the County's discretion in amending the CSD, or other action pursuant to the County's legislative or police powers, to impose more restrictive requirements. This Agreement neither establishes nor abrogates any vested rights to drill new wells in the Oil Field. The County will provide written guidance on the additional limits and controls regarding operation of the Oil Field which are required by this Agreement to County staff and departments responsible for implementing the CSD and enforcing the CSD, and any other personnel the County deems necessary. The County shall recirculate this written guidance on an annual basis.	The requirements of the CSD and the Settlement Agreement remain in full effect. The County released the written guidance required by this provision via the Periodic Review report as described in CSD provision G.7 and a Settlement Agreement 2017 Compliance Report dated 10/5/17.

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#	CSD Section/ Plan	CSD Language	Compliance Description
1	E.1.a G.7 (2015)	E.1.a: Community Alert Notification System ("CAN"). The operator shall maintain and test on an annual basis a CAN for automatic notification of area residences and businesses in the event of an emergency arising at the oil field that could require residents or inhabitants to take shelter, evacuate, or take other protective actions. G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "the E.1.a annual Community Alert Notification (CAN) tests include interested residents."	The CAN is maintained and was tested on 12/5/2018. Interested residents were included in this test pursuant to the G.7/Final 2015 Periodic Review Final Report recommendation on this provision.
2	E.1.b	Spill Containment Response Training. The operator shall conduct annual spill containment response training and shall at all times have available, on-site, sufficient and properly maintained equipment and/or facilities so that a spill of the entire contents from the largest oil tank on the oil field can be responded to and contained in a timely manner to reduce the likelihood that the spill reaches a catch basin.	The annual spill containment response training occurred on 03/14/2018.
3	E.1.c	Emergency Response Plan ("ERP"). The operator shall at all times maintain and fully implement and comply with all provisions of an emergency response plan and shall further ensure that the then current ERP satisfies all rules and regulations of the United States Environmental Protection agency and California Code of Regulations relating to emergency action plans and spill prevention control and countermeasure plans, as well as the rules, regulations, and requirements of the California Office of Spill Prevention and Response. The ERP shall also satisfy the rules and regulations of the United States Department of Transportation relating to onshore pipeline spills.	SPR maintains, fully implements and complies with an ERP that is in compliance with all applicable rules and regulations of agencies with oversight of the ERP.
4	E.2.a	Emission Offsets. The operator shall obtain emission offsets or RECLAIM credits as defined and required by SCAQMD Regulations for all new or modified emission sources that require a new or modified SCAQMD permit.	No credits were needed in 2018.
5	E.2.c	Odor Minimization. At all times the operator shall comply with the provisions of an odor minimization plan that has been approved by the director. The odor minimization plan shall include any measures requested by the director. The plan shall provide detailed information about the facility and shall address all issues relating to odors from oil operations. Matters addressed within the plan shall include setbacks, signs with contact information, logs of odor complaints, method of controlling odors such as flaring and odor suppressants, and the protocol for handling odor complaints. The odor minimization plan shall be reviewed by the operator on an annual basis to determine if modifications to the plan are required. Any modifications to the odor minimization plan shall be submitted to the director for review and approval.	The Odor Minimization Plan was reviewed by SPR on 1/9/2019 and it was determined that no modifications are required.
6	E.2.d.	Air Monitoring Plan. At all times the operator shall comply with the provisions of an air monitoring plan that has been approved by the director. The air monitoring plan shall include any measure requested by the director. During drilling, re-drilling, and reworking operations, the operator shall monitor for hydrogen sulfide and total hydrocarbon vapors as specified in the approved plan. Total hydrocarbon vapors shall be monitored at the gas plant as specified in the approved plan. Such monitors shall provide automatic alarms that are triggered by the detection of hydrogen sulfide or total hydrocarbon vapors. For drilling, re-drilling, or reworking monitors, the alarms shall be audible and/or visible to the person operating the drilling, re-drilling, or reworking equipment. For the gas plant monitors, the alarms shall be audible or visible to the gas plant operator. Actions to be taken shall be as follows when specified alarm levels are reached:	SPR complied with the provisions of the approved Air Monitoring Plan. Compliance was monitored by County Environmental Compliance Coordinator (ECC) site visits.



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7	E.2.d.i - iv	<p>i. At a hydrogen sulfide concentration of equal to or greater than five parts per million but less than 10 parts per million, the operator shall immediately investigate the source of the hydrogen sulfide emissions and take prompt corrective action to eliminate the source. The corrective action taken shall be documented in the drilling, redrilling, or reworking log. If the concentration is not reduced to less than five parts per million within four hours of the first occurrence of such concentration, the operator shall shut down the drilling, redrilling, or reworking operations in a safe and controlled manner, until the source of the hydrogen sulfide emissions has been eliminated, unless shutdown creates a health and safety hazard.</p> <p>ii. At a hydrogen sulfide concentration equal to or greater than 10 parts per million, the operator shall promptly shut down the drilling, redrilling, or reworking operations in a safe and controlled manner until the source of the hydrogen sulfide emissions has been eliminated, unless shutdown creates a health and safety hazard. The corrective action taken shall be documented in the drilling, redrilling, or reworking log. When an alarm is received, the operator shall promptly notify the county fire department- Health Hazardous Materials Division, the Culver City Fire Department, the Office of Emergency Services, and the SCAQMD.</p> <p>iii. At a total hydrocarbon concentration equal to or greater than 500 parts per million but less than 1,000 parts per million, the operator shall immediately investigate the source of the hydrocarbon emissions and take prompt corrective action to eliminate the source. The corrective action taken shall be documented in the drilling log for drilling, redrilling, or reworking and in the gas plant log for the gas plant. If the concentration is not reduced to less than 500 parts per million within four hours of the first occurrence of such concentration, the operator shall shut down the drilling, redrilling, reworking, or gas plant operations in a safe and controlled manner, until the source of the hydrocarbon emissions has been eliminated, unless shutdown creates a health and safety hazard.</p> <p>v. At a total hydrocarbon concentration equal to or greater than 1,000 parts per million, the operator shall promptly shut down the drilling, redrilling, or reworking or gas plant operations in a safe and controlled manner, until the source of the hydrocarbon emissions has been eliminated, unless shutdown creates a health and safety hazard. The corrective action taken shall be documented in the drilling log for drilling, redrilling, or reworking and in the gas plant log for the gas plant. When an alarm is received, the operator shall promptly notify the county fire department- Health Hazardous Materials Division, the Culver City Fire Department, and the SCAQMD.</p>	<p>In 2018, no notifications to The County or City of Culver City Fire Departments or AQMD were required.</p>
8	E.2.d.v	<p>All the monitoring equipment shall keep a record of the levels of total hydrocarbons and hydrogen sulfide detected at each of the monitors, which shall be retained for at least five years. The operator shall, on a quarterly basis, provide a summary of all monitoring events where the hydrogen sulfide concentration was at five parts per million or higher and the total hydrocarbon concentration was at 500 parts per million or higher to the fire chief. At the request of the fire chief, the operator shall make available the retained records from the monitoring equipment.</p>	<p>In 2018, SPR provided the Fire Chief with quarterly reports, all of which reported zero (0) events during the respective quarter, on 4/2/18, 7/5/18, 1/14/19, and 1/14/19.</p>
9	E.2.e	<p>Portable Flare for Drilling. The operator shall have a gas buster and a portable flare, approved by the SCAQMD, at the oil field and available for immediate use to remove any gas encountered during drilling operations from drilling muds prior to the muds being sent to the shaker table, and to direct such gas to the portable flare for combustion. The portable flare shall record the volume of gas that is burned in the flare. The volume of gas burned in the flare shall be documented in the drilling log. The operator shall notify the fire chief and the SCAQMD within 48 hours in the event a measurable amount of gas is burned by the flare, and shall specify the volume of gas that was burned in the flare. No drilling or redrilling shall be conducted in areas that are known to penetrate the Nodular Shale zone unless a fully operational and properly maintained gas buster and portable flare are installed on the rig. All other drilling and redrilling operations shall be conducted so that any measurable gas that is encountered can, and will, be retained in the wellbore until the gas buster and portable flare are installed on the rig, after which the gas will be run through the system. The operator shall immediately notify the fire chief and the SCAQMD in the event any gas from drilling or redrilling operations is released into the atmosphere without being directed to and burned in the flare.</p>	<p>No notifications to the Fire Chief or AQMD were required In 2018.</p>

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10	E.2.f	Oil Tank Pressure Monitoring and Venting. All oil tanks that contain or could contain oil shall have a fully operational pressure monitoring system that continuously measures and digitally records the pressure in the vapor space of each tank. The detection system shall notify the operator via an alarm when the pressure in the tank gets within 10 percent of the tank relief pressure. In the event of an alarm, the operator shall immediately take corrective action to reduce the tank pressure. The corrective action shall be documented in the operator's log. The operator shall notify the fire chief and the SCAQMD within 24 hours if the pressure in any tank covered by this subsection ever exceeds such tank's relief pressure. Within seven calendar days after any tank vapor release, the operator shall report the incident to the SCAQMD as a breakdown event pursuant to Rule 430, and shall provide the fire chief with a written report of the event and the corrective measures undertaken and to be undertaken to avoid future oil tank vapor releases. The operator shall make any changes to such report that may be required to obtain approval from the fire chief and the SCAQMD, and shall promptly institute all corrective measures called for by the report.	No alarms requiring notification occurred in 2018; hence no notifications to the Fire Chief or the SCAQMD were necessary.
11	E.2.g	Odor Suppressant for Bioremediation Farms. When loading material or tilling material at the bioremediation farms, the operator shall use an odor suppressant such that no odor from the bioremediation farms can be detected at the outer boundary line.	The biofarms were not operated in 2018.
12	E.2.h	Odor Suppressant for Drilling and Redrilling Operations. The operator shall use an odor suppressant spray system on the mud shaker tables for all drilling and redrilling operations to ensure that no odors from said operations can be detected at the outer boundary line.	No drilling or redrilling activities occurred in 2018.
13	E.2.i	Closed Systems. The operator shall ensure all produced water and oil associated with production, processing, and storage, except those used for sampling only, are contained within closed systems at all times.	Closed systems were in place for all produced water and oil associated with production, processing and storage, except those used for sampling only.
14	E.2.j	Meteorological Station. The operator shall maintain and operate a meteorological station at the oil field in good operating condition and in compliance with all applicable Environmental Protection Agency ("EPA") and SCAQMD rules, regulations, and guidelines, and to the satisfaction of the director. The operator shall conduct an audit of the meteorological station on an annual basis and submit the results of the audit to the SCAQMD and the director. The operator shall maintain the data files for the meteorological station for a period of not less than 10 years. All such data shall be available upon request to the SCAQMD and the director.	SPR maintains and operates a meteorological station at the field in compliance with this policy. The 2017 annual audit of the station was submitted to the County on 11/13/2018 and the 2018 annual audit is projected to be submitted in the spring or summer of 2019. SPR maintains data files for the station from CSD inception to present. An NOV was issued by the LA County Dept of Regional Planning on 11/14/2018 for deficient data storage in December 2016, January 2017, and February 2017 referencig > 10% missing or anomalous data. SPR submitted a revised 2017 annual audit report addressing the NOV. New sensors and a datalogger with greater retention and automated connectivity to our corporate system were put into service in May 2018. Those improvements along with adherence to the 6 month calibration cycle position the Inglewood Oil Field Meteorological Station to comply with terms of the CSD going forward.
15	E.2.k	Updated Health Risk Assessment. After every five years of operation of the meteorological station, the operator shall provide the previous five years of metrological data to the SCAQMD and the director. If the SCAQMD or the director determines that the previous five years of metrological data from the oil field could result in significant changes to the health risk assessment that was conducted as part of the Baldwin Hills Community Standards District Environmental Impact Report, then the county may elect to re-run the health risk assessment using the previous five years of metrological data from the metrological station.	The first five years of data was submitted to the SCAQMD and the Director on 12/2/15. The next five years of data is due in 2020.



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16	E.2.l	<p>Off-Road Diesel Construction Equipment Engines. All off-road diesel construction equipment shall comply with the following provisions:</p> <p>i. Utilize California Air Resources Board ("CARB") EPA Certification Tier III or better certified engines or other methods approved by the CARB as meeting or exceeding the Tier III standard or Tier II certified engines as long as no drilling or redrilling occurs during construction.</p> <p>ii. Utilize a CARB Verified Level 3 diesel catalyst. The catalyst shall be capable of achieving an 85 percent reduction for diesel particulate matter. Copies of the CARB verification shall be provided to the director. Said catalysts shall be properly maintained and operational at all times when the off-road diesel construction equipment is in use.</p>	<p>All off-road diesel construction equipment engines utilized Tier III or better diesel engines plus Level 3 CARB verified diesel catalysts during all construction projects in 2018.</p>
17	E.2.m	<p>Drill Rig Engines. All drilling, redrilling, and reworking rig diesel engines shall comply with the following provisions:</p> <p>i. Utilize CARB/EPA Certification Tier II or better certified engines, or other methods approved by CARB as meeting or exceeding the Tier II standard.</p> <p>ii. Utilize second generation heavy duty diesel catalysts capable of achieving 90 percent reductions for hydrocarbons and for particulate matter smaller than 10 microns. Said catalysts shall be properly maintained and operational at all times when the diesel engines are running.</p>	<p>No drilling occurred in 2018.</p>
18	E.2.n.	<p>Drilling and Redrilling Setbacks. The following setbacks shall apply within the oil field for drilling or redrilling:</p> <p>i. At least 400 feet from developed areas.</p> <p>ii. At least 20 feet from any public roadway.</p>	<p>All required drilling and redrilling setbacks set forth in this policy were complied with as documented in the 2018 Drilling Plan and all subsequent, individual well permits approved by the County. However, no drilling or redrilling occurred in 2018.</p>
19	E.2.o	<p>Construction Schedule. To reduce construction air emissions, no overlap shall be permitted in major facility construction and installation activities such as the steam drive plant, the water processing facility, or the oil cleaning plant.</p>	<p>There was no overlap in construction activity since no steam drive plant, water processing facility or oil cleaning plant were installed in 2018.</p>
20	E.2.p	<p>Fugitive Dust Control Plan. The operator shall comply with the provisions of a fugitive dust control plan that has been approved by the director. The plan shall be based upon the requirements of SCAQMD Rule 403 and the SCAQMD CEQA Guideline Fugitive Dust Control Measures. The fugitive dust control plan shall be reviewed by the operator every five years to determine if modifications to the plan are required. Any modifications to the fugitive dust control plan shall be submitted to the director for review and approval. The fugitive dust control plan shall include any measured requested by the director.</p>	<p>The Fugitive Dust Control Plan was submitted on March 26, 2009 and revised and approved in April 2010. Compliance with the provisions of the Plan are verified by the County ECC. The Operator reviewed the Plan on 11/21/16 and determined that no modifications to the plan are required. The County was notified of this determination on 11/21/16. Next review due in November 2021.</p>
21	E.3.a	<p>Natural Gas Liquid Blending. Natural gas liquids at the gas plant shall be blended with the oil to the maximum allowable pipeline system vapor pressure. Natural gas liquids storage shall be limited to the volume allowed in the risk management plan approved by the fire department.</p>	<p>SPR blends the natural gas liquids (NGLs) to the maximum allowable pipeline system vapor pressure as required by the subject CSD provision requirement. The storage of the NGL tank is in compliance with the criteria in the Risk Management Plan. The LA County Fire Department verifies compliance with this provision via site inspections.</p>
22	E.3.b	<p>Propane and Natural Gas Liquids Bullet Fire-Proofing. The operator shall install and maintain fire-proofing insulation on all propane and natural gas liquids bullets within the oil field. The fire-proofing insulation shall have a minimum two hour fire rating and otherwise be acceptable to the fire chief. All propane and natural gas liquid bullets shall be equipped with an automatic deluge system.</p>	<p>The propane and natural gas liquids bullet fire proofing was completed on February 23, 2009 with the associated documentation submitted to the LA County Fire Department on February 25, 2009.</p>
23	E.3.c	<p>Steam Drive Plant Setback. The steam drive plant, if constructed, shall be located at least 1,000 feet from a developed area and shall use urea or equivalent, low toxicity material for any nitrogen oxide emission reduction that is required by the SCAQMD.</p>	<p>A steam drive plant has not been proposed or constructed to date.</p>

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24	E.3.d.i	The operator shall ensure that all existing oil tank areas in the oil field, unless determined by the director to be infeasible, and all the new oil tank areas shall have secondary containment (berms and/or walls) that can contain at least 110 percent of the largest oil tank volume to reduce the likelihood of oil spills entering the retention basins. In the event the director determines that it would be infeasible to provide 110 percent containment for a particular existing oil tank, the operator shall provide such containment as the director determines is feasible.	As documented in the Operator's 2009 Tank Leak Detection and Containment at Inglewood Oil Field report, approved in May 2009, all tanks have secondary containment per this provision.
25	E.3.d.ii	All retention basins in the oil field shall be adequately sized, and maintained to handle a 100-year storm event plus a potential spill of the volume of the largest tank that would drain into each basin.	The Operator's Retention Basin Study, completed in March 2009 and revised in September 2009 and January 2010, analyzed and modeled the capacities of the basins along with a 100 year storm event. The study concluded that the onsite basins have the capability to handle a 100 year storm event without flooding per the CSD requirement. The study further determined that in the event of an oil tank failure during a 100 year storm event, the basin weir system would prevent oil from going offsite. The County Public Works Department has reviewed and approved the retention basin capacities.
26	E.3.d.iii	All above ground piping in the oil field that contains or could contain oil shall be protected by basins or secondary containment measures (berms and/or walls).	Most of the above ground piping throughout the oil field is not protected by individual pipeline specific secondary containment or basin structures; however, the oil field retention basin system prevents any fluid from the above ground piping from traveling offsite.
27	E.4.a.i, ii and iii	<ul style="list-style-type: none"> <li>i. All proposed grading shall be subject to prior review and approval by the director of public works.</li> <li>ii. Grading involving up to 5,000 cubic yards and grading associated with the bioremediation farms may be undertaken pursuant to a county master grading plan stamped by a registered professional engineer and a California certified engineering geologist and approved by the director of public works.</li> <li>iii. No slope of cut or fill shall have a gradient steeper than two to one (2:1) unless specifically approved by a site specific geotechnical report.</li> <li>iv. Cuts and fills shall be minimized to avoid erosion and visual impacts.</li> </ul>	SPR conducts all grading in accordance with the Master Grading Plan as approved by the LA County Department of Public Works (DPW) on May 8, 2017.
28	E.4.b.ii	A site-specific geotechnical investigation shall be completed for grading in excess of 5,000 cubic yards, unless associated with the on-site Bioremediation Farms and approved pursuant to a master grading plan approved by the director of public works, and for any grading that supports or impacts a critical facility as determined by the director. The investigation shall be completed by a California certified engineering geologist and submitted to the director and the director of public works for review and approval, in conjunction with an application for a revised grading permit.	No grading that occurred in 2018 triggered the requirement for a site specific geotechnical investigation.
29	E.4.b.ii	A site-specific geotechnical investigation shall be completed for all proposed permanent structures. The investigation shall include analysis and recommendations associated with potential seismically induced ground failure, such as differential settlement and lateral spreading. The geotechnical investigation shall be completed by a California-certified engineering geologist and submitted to the director of public works for review and approval.	No permanent structures were proposed or built in 2018; hence no site specific geotechnical investigations were necessary.
30	E.4.c.i	The operator shall comply with all provisions of an erosion control plan that has been approved by the director. The erosion control plan shall be reviewed by the operator every two years to determine if modifications to the plan are required. Any modifications to the erosion control plan shall be submitted to the director for review and approval. The erosion control plan shall include any measures requested by the director.	The Operator's 2009 Erosion Control Plan Inglewood Oil Field was initially submitted on May 26, 2009, revised in October 2009 and approved by County Public Works in May 2010. The Operator reviewed the Erosion Control Plan on 5/18/18 and determined that no modifications to the plan are required. The next bi-annual review will occur in May of 2020.
31	E.4.d	Restoration of Slopes. Slopes shall be restored to their original grade once the use that required the grading of the slope has been discontinued. However, if restoration of a slope would negatively affect existing drainage patterns or slope stability, then the slope shall be restored to a grade that avoids these negative effects.	No grading that would negatively affect existing drainage patterns or slope stability occurred in 2018.

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32	E.4.e	<p>Ground Movement Surveys. The operator shall conduct ground movement surveys once every 12 months, or more frequently if determined necessary by the director of public works, following all provisions of a ground movement monitoring plan that is acceptable to DOGGR and the director of public works, that calls for both vertical and horizontal ground movement surveys, at specified survey locations within, and in the vicinity of, the oil field, utilizing high precision Global Positioning System technology, in combination with a network of ground stations (or any alternative technology specified in the ground movement monitoring plan approved by the director of public works), and following other survey methods outlined in the plan. The surveys shall be conducted by a California-licensed surveyor. The survey results shall be analyzed in relation to oil field activities, such as production, steam injection, and water flooding, taking into consideration individual oil producing zones, injection schedules, rates, volume, and pressure. The analysis shall be completed in collaboration by a California-registered professional petroleum engineer, registered geotechnical engineer, and certified engineering geologist. The results of the annual monitoring survey and analysis shall be forwarded to DOGGR and the director of public works. If requested by DOGGR or the director of public works, the operator shall make modifications to the ground movement monitoring plan. In the event that survey indicates that on-going ground movement, equal to or greater than 0.6 inches at any given location, or a lesser value determined by the director of public works is occurring in an upward or downward direction in the vicinity of or in the oil field, the operator shall review and analyze all claims or complaints of subsidence damage that have been submitted to the operator or the county by the public or a public entity in the 12 months since the last ground movement survey. Based thereon, the operator shall prepare a report that assesses whether any of the alleged subsidence damage was caused by oil operations and submit said report to DOGGR and the department of public works. The department of public works shall review the report to determine if it concurs with its conclusions. If the report concludes that damage has not been caused by oil operations, and the department of public works does not concur in that conclusion, it shall forward its conclusions to DOGGR for its review and possible action. If the report concludes that damage was caused by oil operations and the department of public works concurs with any such conclusion, the department of public works shall forward the department of public works' conclusions to DOGGR and ask DOGGR to evaluate the operator's fluid injection and withdrawal rates to determine whether adjustments to these rates may alleviate the ground movement, and if so, where in the oil field such adjustments should be made. The operator shall implement whatever adjustments in the rates of fluid injection and/or withdrawal that DOGGR determines are necessary and appropriate to alleviate any ground movement damage. The county shall promptly notify the CAP of any such action that is taken pursuant to this subsection. Injection pressures associated with secondary recovery operations (i.e., water flooding) or disposal of produced fluids shall not exceed reservoir fracture pressures as specified in Title 14 of the California Code of Regulations, section 1724.10, and as approved by the DOGGR.</p>	<p>Ground movement surveys have been completed as required by the approved Accumulated Ground Movement Plan. The Year 2017 annual survey was submitted on November 7, 2018 to DPW and DOGGR . Plans are to begin surveying in January 2019 for the Year 2018 report.</p> <p>Five monuments had a change in elevation in excess of the 0.6" threshold in Year 2017. All five monuments were uplifted. Therefore, investigations were conducted on the two property damage claim received. The subsequent reports were submitted to County Public Works and DOGGR for review. Both reports concluded that the damage was not caused by oil field activities.</p>
33	E.4.f	<p>Construction of Permanent Structures. No permanent structures shall be constructed in an Alquist-Priolo Fault Zone without preparation of a fault study by a California-certified engineering geologist. Following the fault study, no permanent structures shall be placed within 50 feet of a known active fault. The fault investigation report shall be submitted to the director of public works for review and approval.</p>	<p>No permanent structures have been constructed in an Alquist-Priolo Fault Zone since the adoption of the CSD.</p>
34	E.4.g	<p>Oil Field Accelerometer. The operator shall operate and maintain an accelerometer at the oil field to determine site-specific ground accelerations as a result of any seismic event in the region (Los Angeles/Orange County and offshore waters of the Santa Monica Bay and San Pedro Channel). Readings from the accelerometer shall be recorded at the oil field and transmitted in real-time to the Caltech Seismological Laboratory. The operator shall cease operations and inspect all oil field pipelines, storage tanks, and other infrastructure following any seismic event that exceeds a ground acceleration at the oil field of 13 percent of gravity (0.13 g) and promptly notify the director. The operator shall not reinstitute operations at the oil field and associated pipelines until it can reasonably be determined that all oil field infrastructure is structurally sound.</p>	<p>The oil field accelerometer seismic station was installed and began collecting data on May 20, 2009. The data is transmitted in real time by cell link to the CalTech Seismological Laboratory where the data is recorded and stored. The accelerometer has not measured ground acceleration in excess of the 13 percent of gravity (0.13 g) criteria of this provision to date, thus the oil field has not been required to shut in due to a ground acceleration event.</p>
35	E.4.h	<p>Pipeline Management Plan. The operator shall maintain and implement a pipeline management plan that meets the requirements of DOGGR regulations.</p>	<p>The pipeline management plan is being maintained per DOGGR regulations.</p>

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#	CSD Section/ Plan	CSD Language	Compliance Description
36	E.4.i	Paleontological Monitor. The operator shall have a qualified paleontologist, approved by the director, monitor all rough grading and other significant ground disturbing activities in paleontological sensitive sediments. The sensitive sediments that have been identified within the oil field include the Lower to Middle Pleistocene San Pedro Formation and the Middle to Upper Pleistocene Lakewood Formation. A paleontologist will not be required on site if excavation is only occurring in artificial fill or Holocene alluvium.	In 2018, no work occurred in paleontological sensitive sediments. As such, no monitoring occurred.
37	E.5.a	E.5.a Noise Limits. The operator shall comply with the following provisions: i. All oil operations on the oil field shall comply with the noise provisions of Chapter 12.08 of Title 12 of the County Code, with the exception of drilling, redrilling, and reworking, which are exempt from the provisions of said chapter. ii. Hourly, A-weighted equivalent noise levels associated with drilling, redrilling, and reworking shall not elevate existing baseline levels by more than five dBA at any developed area. For daytime activities (7:00a.m. to 7:00p.m.) existing baseline noise levels shall be defined as the maximum daytime equivalent noise level (Leq) at the closest monitoring site as shown in Table 4.9.3 of the 2008 Baldwin Hills Community Standards District Environmental Impact Report. For nighttime activities (7:00 p.m. to 7:00a.m.), existing baseline noise levels shall be defined as the minimum nighttime equivalent noise level (Leq) at the closest monitoring site as shown in Table 4.9.3 of the 2008 Baldwin Hills Community Standards District Environmental Impact Report. Updated baseline noise levels may be set and additional monitoring sites may be established, from time to time by the director. In no case shall baseline noise levels include any drilling, redrilling, or reworking operations. iii. Noise produced by oil operations shall include no pure tones when measured at a developed area.	Noise monitoring to date has not identified any violations associated with oil field operations above the baseline levels of the noise limits set forth in the CSD or Settlement Agreement.
38	SA 2	a. The CSD currently provides that hourly, A-weighted equivalent noise levels associated with drilling, redrilling and reworking wells shall not elevate baseline levels (which shall not include drilling, redrilling or reworking operations) by more than five A-weighted decibels ("dBA") at the Oil Field boundary of any Developed Area. Instead of the referenced five dB A provision, PXP shall limit the night time (10 p.m. to 7 a.m.) noise levels at Developed Areas to no more than three dBA above a one-hour baseline average for the defined nighttime period, but at no time will PXP be required to maintain noise levels below the baseline nighttime noise levels. Furthermore, PXP and the County determined the baseline noise levels at four additional Oil Field boundary locations near Developed Areas, selected by PXP and the County, in addition to the seven utilized in the EIR for a total of 11 locations. If PXP violates the above noise requirements, no new drilling or redrilling permits shall be issued by the County until PXP, in consultation with the County, identifies the source of the noise and PXP takes steps necessary to assure compliance with the above-specified threshold. b. If drilling, redrilling or reworking operations elevate nighttime baseline noise levels by more than 10 dBA for more than 15 minutes in any one hour as independently verified and determined by the County, PXP, in consultation with the County, shall identify the cause and source of the noise and take steps to avoid such extended periods of noise elevation in the future. This provision does not negate the CSD noise limits between 7 a.m. to 10 p.m.	Noise monitoring to date has not identified any violations associated with oil field operations above the baseline levels of the noise limits set forth in the CSD or Settlement Agreement.
39	E.5.b	Backup Alarms. Backup alarms on all vehicles operating within the oil field shall be disabled between the hours of 8:00 p.m. and 8:00 a.m. During periods when the backup alarms are disabled, the operator shall employ alternate, low-noise methods for ensuring worker safety during vehicle backup, such as the use of spotters.	This provision has been implemented and is ongoing.
40	E.5.c	Quiet Mode Drilling Plan. All drilling and redrilling on the oil field between the hours of 6:00 p.m. and 8:00 a.m. shall be conducted in conformity with a quiet mode drilling plan that has been approved by the director and the director of public health. The quiet mode drilling plan shall be reviewed by the operator every year to determine if modifications to the plan are required. The operator shall make changes to the plan if requested by the director or the director of public health. Any modifications to the quiet mode drilling plan shall be submitted to the director and the director of public health for review and approval. The quiet mode drilling plan shall include any measures requested by the director or the director of public health.	No drilling and redrilling activities occurred in 2018. SPR reviewed the Quiet Mode Drilling Plan on 1/9/2019 and concluded that there are no modifications necessary to the plan In 2019.
41	E.5.d	Equipment Servicing. All noise producing oil field equipment shall be regularly serviced and repaired to minimize increases in pure tones and other noise output over time. The operator shall maintain an equipment service log for all noise-producing equipment.	SPR Operations maintains service records for such equipment.

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42	E.5.e	Deliveries to the Oil Field. Deliveries to the oil field shall not be permitted after 8:00 p.m. and before 7:00a.m. except in cases of emergency. Deliveries on Sundays or legal holidays shall not be permitted after 8:00 p.m. or before 9:00a.m., except in cases of emergency.	This provision has been implemented and is ongoing.
43	E.5.f	Deliveries within the Oil Field. Deliveries to areas of the oil field located within 500 feet of any residential property shall not be permitted after 5:00 p.m. or before 7:00a.m. except in cases of emergency. Deliveries to such areas on Sundays or legal holidays shall not be permitted after 5:00 p.m. and before 9:00a.m., except in cases of emergency.	This provision has been implemented and is ongoing.
44	E.5.g	Time Limits for Construction. Construction of permanent structures shall not be permitted after 7:00 p.m. and before 7:00a.m., or during Saturdays, Sundays, or legal holidays.	No construction occurs after 7:00 p.m. and before 7:00 a.m., or during Saturdays, Sundays, or legal holidays.
45	E.5.h	Construction Equipment. All construction equipment shall be selected for low-noise output. All construction equipment powered by internal combustion engines shall be properly muffled and maintained.	All construction equipment is selected to comply with this provision.
46	E.5.i	Construction Equipment Idling. Unnecessary idling of construction equipment internal combustion engines is prohibited.	All SPR construction equipment operators implement this provision.
47	E.5.j	Worker Notification. The operator shall instruct employees and subcontractors about the noise provisions of this subsection E.5 prior to commencement of each and every drilling, re-drilling, reworking, and construction operation, and shall annually certify to the director that such employees and subcontractors have been properly trained to comply with such noise provisions. The operator shall prominently post quiet mode policies at every drilling and re-drilling site.	No drilling or re-drilling occurred in 2018.
48	E.6	Vibration Reduction. All oil operations on the oil field shall be conducted in a manner that minimizes vibration. Additionally, vibration levels from oil operations at the oil field shall not exceed a velocity of 0.25 mm/s over the frequency range 1 to 100 Hz at any developed area.	All operations are conducted to minimize vibration. The report prepared by the County in response to the request by PXP in October 2011 to increase the annual number of wells allowable for drilling or re-drilling, the Annual Well Increase Evaluation, December 2011, includes analysis on the implementation of the vibration provision of the CSD. The report concluded that the CSD requirements have been effective at keeping vibration to a level that is considered protective of the health and general welfare of the public. Further, the draft periodic review concluded that this provision is fully effective.
49	E.7.a	Oil Spill Response. The operator shall comply with all provisions of an Emergency Response Plan ("ERP") that has been approved by the director, to protect biological species and to revegetate any areas disturbed during an oil spill or clean-up activities. The operator shall make changes to the ERP if requested by the director. Any modifications to the ERP shall be submitted to the director for review and approval. The ERP shall include any measures to protect biological species that may be requested by the director.	Since approval of the ERP by DRP, no updates have been needed or requested.
50	E.7.b	Special Status Species and Habitat Protection. The operator shall comply with all provisions of a special status species and habitat protection plan that has been approved by the director. The operator shall make changes to the plan if requested by the director. Any modifications to the plan shall be submitted to the director for review and approval. The special status species and habitat protection plan shall include any measures requested by the director.	The Special Status Species and Habitat Protection Plan was first prepared in 2009 and was approved on November 15, 2010. The plan was prepared by a County approved ecologist/biologist. Compliance with subsections E.7.b through E.7.h has been documented annually since 2010 - the 2018 compliance report was submitted in February 2019.

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51	E.7.c, h	<p>c) Habitat Restoration and Revegetation Plan. Prior to any disturbance of sensitive natural habitat areas, as identified in the special status species and habitat protection plan, the operator shall hire a biologist, approved by the county, to conduct a survey of the area to determine if significant impact to sensitive natural habitat, including coastal sagebrush, coyote bush scrub, riparian scrub, and oak woodland will occur. If the biologist determines that significant impact to sensitive natural habitat will occur, then the operator shall have a county-approved restoration specialist, with expertise in southern California ecosystems and revegetation techniques, prepare a habitat restoration and revegetation plan. The plan shall be submitted to the director for review and approval. The director shall make best efforts to complete the review of the plan as expeditiously as possible and shall then either approve the plan or provide the operator with a list of specific items that must be included in the plan prior to approval. No removal of sensitive natural habitat shall occur until the plan has been approved by the director. The habitat restoration and revegetation plan shall include any measures requested by the director.</p> <p>h) Habitat Restoration. Within 60 days of completion of construction activities that have significantly impacted sensitive natural habitat, the operator shall begin habitat restoration consistent with the approved native habitat restoration and revegetation plan discussed in subsection E.7.c. Restoration priority shall be given to areas of degraded habitat connecting areas of higher quality habitat and where restoration would produce larger corridors to support the migration and movement of wildlife. The operator shall replace any significant loss of sensitive natural habitat at the following ratios:</p> <p>i. 1:1 for each acre of coastal sagebrush or coyote bush scrub.</p> <p>ii. 2:1 for each acre of riparian scrub or oak woodland.</p>	No Habitat Restoration and Revegetation Plans were necessary in 2018.
52	E.7.d, e, f, g	<p>d) Pre-Construction Surveys. The following surveys shall be conducted prior to any significant vegetation removal in sensitive natural habitat as identified in the special status species and habitat protection plan.</p> <p>e) Listed Plant or Wildlife Species. If federal- or State-listed plant or wildlife species are found, then the operator shall comply with all applicable United States Fish and Wildlife and California Department of Fish and Game rules and regulations.</p> <p>f) Construction Monitoring. If the pre-construction surveys find sensitive plant, wildlife species, or nesting birds, a biological monitor hired by the operator, and approved by the County, shall be on site during construction to monitor the construction activities.</p> <p>g) Tree and Riparian Scrub Removal. Removal of native or non-native trees and riparian scrub vegetation shall be scheduled, as possible, for removal outside the nesting season to avoid impacts to nesting birds. If avoidance of removal of trees or riparian scrub during the recommended periods is not possible, a county-approved biologist shall perform a survey to ensure that no nesting birds are present prior to removal. If for any reason a nest must be removed during the nesting season, the operator shall provide written documentation to the director demonstrating concurrence from the United States Fish and Wildlife Service and California Department of Fish and Game authorizing the nest relocation and a written report documenting the relocation efforts.</p>	Any required pre-construction surveys or construction monitoring that was completed in 2018 is documented in the 2018 Special Status Species and Habitat Protection Plan annual report which was submitted to DRP on 2/27/19. No listed plant or wildlife species were found.
53	E.8.a	Cone Trust House. Oil operations shall not result in impacts to the Cone Trust House	The Cone Trust House is off limits to oil field staff to prevent any impacts to the building.
54	E.8.b	E.8.b: Archaeological Training. The operator shall provide archeological training for all construction personnel who will be involved with ground disturbance activities at the oil field. All such construction personnel shall be required to participate in the training and will receive training material prepared by a qualified archaeologist prior to working on ground disturbance activities.	No construction operations occurred in 2018.
55	E.8.c	Construction Treatment Plan. The operator shall comply with all provisions of a construction treatment plan, approved by the director, to ensure that any new archeological discoveries are adequately recorded, evaluated, and, if significant, mitigated. In the event that unknown archaeological artifacts are encountered during grading, clearing, grubbing, and/or other construction activities, work shall be stopped immediately in the vicinity of the find and the resource shall be evaluated by a qualified archaeologist, approved by the director. The construction treatment plan shall include any measures requested by the director.	No archaeological artifacts were uncovered In 2018.

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56	E.9	<p>Lighting. Outdoor lighting shall be restricted to only those lights which are required by code for the lighting of building exteriors, drilling, and re-drilling rigs and for safety and security needs. In addition, the operator shall comply with the following provisions:</p> <p>a. Screening. All new point lighting sources within the oil field shall be screened and directed to confine direct rays to the oil field and to prevent offsite spillover lighting effects to the extent feasible.</p> <p>b. Lighting Plan. A detailed lighting plan shall be prepared for each new permanent structure and submitted to the director for review and approval. No work may be commenced on such permanent structure until the lighting plan therefore has been approved by the director. The lighting plan shall include any measures requested by the director.</p>	<p>In November 2008, an assessment of all oil field lighting was completed to confirm compliance with the CSD lighting provisions and to confirm that there were no offsite lighting impacts.</p>																								
57	E.10 SA 11 G.7 (2015)	<p>E.10: Landscaping, Visual Screening, Irrigation and Maintenance. The operator shall comply with the conceptual landscaping plan for the oil field prepared by Mia Lehrer &amp; Associates, dated October 2008, on file at the department of regional planning, which is intended to beautify and screen the oil field from adjoining residential, recreational, and institutional areas or adjacent public streets or highways. Landscaping required by this plan shall be completed in phases over a two-to five-year period as approved by the director. All landscaping on the oil field shall be routinely inspected (on at least a monthly basis) and maintained in a neat, clean, and healthful condition, including proper watering, pruning, weeding, fertilizing, and replacement of plants as needed. Litter shall also be removed on a regular basis.</p> <p>SA 11: Landscaping. PXP agrees to prepare and implement a series of landscape plans ("Landscape Plans") that enhance the Mia Lehrer Landscape Improvements Concepts plan dated November 4, 2008 to include, but not be limited to, landscaping along or near the border of the Oil Field in consultation with the County and subject to the County's approval. PXP's Landscape Plans shall be forwarded to the CAP for review.</p> <p>PXP will use best efforts to complete installation of the first two phases of the Landscape Plans along La Brea, between Stocker and Slauson, and Ladera Crest, within nine (9) months of County's final approvals of each of those first two Landscaping Plans using best landscaping practices. PXP agrees that it will complete the entire landscaping required by the County-approved Landscape Plans within three years after approval by the County of the final phase.</p> <p>G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "Operator schedule installation of the remaining E.10 landscaping phases to achieve the landscaping required by this provision in a timely manner.</p>	<p>All phases of landscaping have been submitted and approved. The schedule of approvals and work is summarized in the table below:</p> <table border="1"> <thead> <tr> <th>Phase</th> <th>Plan</th> <th>Landscaping</th> </tr> </thead> <tbody> <tr> <td>1-Ladera Crest West-side North</td> <td>Approved 5/11/11</td> <td>Completed 10/20/11</td> </tr> <tr> <td>2-Windward Hills on Brea West-side</td> <td>Approved 10/11/11</td> <td>Completed 07/12/12</td> </tr> <tr> <td>3-La Brea West-side East/La Cienega Blvd</td> <td>Approved 07/12</td> <td>Completed 12/1/12</td> </tr> <tr> <td>4-La Cienega Roadway East</td> <td>Approved 07/12</td> <td>Completed 11/20/12</td> </tr> <tr> <td>5-La Cienega Roadway West</td> <td>Approved 07/12</td> <td>Completed 11/1/12</td> </tr> <tr> <td>6-Fishers Ave Roadway East and West</td> <td>Approved 4/22/12</td> <td>Completed 11/1/12</td> </tr> <tr> <td>7-Stocker Street Roadway North and South</td> <td>Approved 4/22/12</td> <td>Completed 12/21/12</td> </tr> </tbody> </table>	Phase	Plan	Landscaping	1-Ladera Crest West-side North	Approved 5/11/11	Completed 10/20/11	2-Windward Hills on Brea West-side	Approved 10/11/11	Completed 07/12/12	3-La Brea West-side East/La Cienega Blvd	Approved 07/12	Completed 12/1/12	4-La Cienega Roadway East	Approved 07/12	Completed 11/20/12	5-La Cienega Roadway West	Approved 07/12	Completed 11/1/12	6-Fishers Ave Roadway East and West	Approved 4/22/12	Completed 11/1/12	7-Stocker Street Roadway North and South	Approved 4/22/12	Completed 12/21/12
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58	E.11.a and b	<p>Oil Field Waste Removal. The operator shall comply with the following provisions:</p> <p>a) Waste Collection. All drilling, re-drilling, and reworking waste shall be collected in portable steel bins compliant with United States Department of Transportation standards. Any drilling, re-drilling, and reworking wastes that are not intended to be injected into a Class II Well, as permitted by DOGGR, shall be removed from the oil field no later than 30 days following completion of the drilling, re-drilling, and reworking. This provision does not apply to active sumps and mud pits.</p> <p>b) Waste Discharge. No oil field waste shall be discharged into any sewer, storm drain, irrigation systems, stream or creek, street, highway, or drainage canal. Nor shall any such wastes be discharged on the ground provided that the foregoing shall not prohibit the proper use of active drilling sumps and mud pits.</p>	<p>All reworking wastes were collected in portable steel bins compliant with USDOT standards and removed from the field within 30-days of completion of the activity. No drilling or re-drilling occurred in 2018. There are no sumps or mud pits on the field. No oil field waste was discharged off site.</p>																								
59	E.11.c	<p>Recycling Plan. The operator shall comply with all provisions of a recycling plan that has been approved by the director. The recycling plan shall include any elements requested by the director.</p>	<p>The Recycling Plan was approved on October 3, 2011 and has been implemented and is ongoing.</p>																								
60	E.12	<p>Construction of Private Roads. Roads and other excavations shall be designed, constructed, and maintained to provide stability of fill, minimize disfigurement of the landscape, prevent deterioration of vegetation, maintain natural drainage, and minimize erosion. Prior to construction of any new road, the operator shall prepare and submit to the director of public works for review and approval a private road construction plan. The operator shall thereafter comply with all provisions of the approved private road construction plan. All new private access roads leading off any surfaced public street or highway shall be paved with asphalt or concrete not less than three inches thick for the first 50 feet of said access road from the public street or highway.</p>	<p>No private roads have been constructed to date and all oil field activities utilize existing access roads.</p>																								

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61	E.13.a-e	<p>Signs. All signage shall comply with Part 10 of Chapter 22.52 of Title 22. In addition, the operator shall comply with the following provisions:</p> <p>a. Perimeter Identification Signs. Identification signs, at intervals acceptable to the director, shall be posted and maintained in good condition along the outer boundary line fence and along the fences adjoining the public roads that pass through the oil field. Each sign shall prominently display current and reliable emergency contact information that will enable a person to promptly reach, at all times, a representative of the operator who will have the expertise to assess any potential problem and recommend a corrective course of action. Each sign shall also have the telephone number of the county department of regional planning zoning enforcement section and the number of SCAOMD that can be called if odors are detected.</p> <p>b. Main Entrance Sign. A sign shall be posted and maintained in good condition at the main entrance of the oil field prominently displaying a telephone number by which persons may contact a representative of the operator at all times to register complaints regarding oil field operations.</p> <p>c. Other Required Signs. All identification signs, warning signs, no trespassing signs, and other signs required by county, state and federal regulations shall be properly posted and maintained in all required locations and in good condition.</p> <p>d. Well Identification Signs. Well identification signs including the well name and well number shall be posted and maintained in good condition at each well location.</p> <p>e. No Littering Signs. "No littering" signs shall be prominently posted and maintained in good condition on all oil field entrance gates.</p>	<p>The installation of the signage required by this provision was completed upon approval of the Signage Plan dated January 2009 (Revision1) and approved by the County on May 18, 2009. In 2018, all required signage was updated to reflect to the name new Operator, Sentinel Peak Resources (SPR), of the oil field, and to remove the name of the previous Operator, Freeport-McMoRan Oil &amp; Gas (FM O&amp;G).</p>
62	E.14	<p>Painting. All oil operation-related structures visible from public roadways and surrounding properties within the oil field shall be painted or otherwise surfaced or textured with a color that is compatible with the surrounding areas and has been approved by the director. The painting or other surfacing of all structures covered by this subsection shall thereafter be maintained in good condition.</p>	<p>The painting of the Inglewood Oil Field structures and equipment was completed on November 12, 2012. The paint color, licorice, was chosen with assistance of a landscape architect and was approved by the LA County Department of Regional Planning. Maintenance of the painting and coatings of the equipment and structures at the oil field is a continuous process.</p>
63	E.15 G.7 (2015)	<p>Sumps. The operator shall comply with all of the following provisions:</p> <p>a. Sump Clean Out. All sumps that are used, installed, or maintained for use in connection with any well, and which have not been used for 90 days for the operation of or the drilling, re-drilling, or reworking of such well or any other well in the vicinity, shall be cleaned out, and all oil, rotary mud, and rubbish removed.</p> <p>b. Sump Fencing. Around each sump of any depth, there shall be erected and continuously maintained a fence that encloses the sump and complies with the requirements of Sections 11.48.010 - 11.48.050, Title 11 of the County Code. This provision shall not apply to sumps that are constantly and immediately attended while drilling, re-drilling, and reworking operations are proceeding as specified in Section 11.48.020, Title 11 of the County Code.</p> <p>G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "the Operator continue the use of metal and or plastic bins E.15.a and tanks consistent with current practice as the elimination of the use of below ground sumps is considered to be a significant environmental benefit.</p>	<p>There are no sumps at the Inglewood Oil Field.</p>



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64	E.16.a-d	<p>Well Cellars. All well cellars shall be constructed in accordance with the most current American Petroleum Institute standards. In addition, the operator shall comply with the following provisions:</p> <p>a. Cellar Fluids. Well cellars shall be kept free of all oil, water, or debris at all times. During drilling, re-drilling, and reworking, the cellar shall be kept free of excess fluids by a pump which discharges into a waste tank, mud pit, vacuum truck, or other approved disposal system.</p> <p>b. Access to Multi-Well Cellars. All multi-well cellars exceeding three feet in depth and 25 feet in length shall have two means of entrance and exit and an additional exit for every 50 feet in length thereafter. At least one means of entrance or exit for all multi-well cellars of 25 feet in length shall be a stairway constructed to California Division of Industrial Safety standards.</p> <p>c. Single-Cellar Covers. All single-cellars shall be covered with open grating and have no openings larger than three inches at any point. Covers shall be capable of supporting vehicle weight or guardrails shall be erected to prevent vehicle access.</p> <p>d. Cellar Ladder Openings. All openings for ladders through grating shall be designed to allow exit from underside without obstruction and shall be kept free of storage of any type. Said openings shall not be less than 24 inches on either side.</p>	Implementation is ongoing where applicable.
65	E.17.a	<p>Construction Storm Water Pollution Prevention Plan ("SWPPP"). The operator shall maintain and implement all provisions of a storm water pollution prevention plan ("SWPPP") that has been inspected by the Regional Water Quality Control Board and the county department of public works. The operator shall provide the director and the director of public works with a copy of the SWPPP, and any future modifications, revisions, or alterations thereof, or replacements therefore. The SWPPP shall be updated prior to new construction activities as required by the Regional Water Quality Control Board.</p>	The DPW was provided with the most up-to-date copy of the RWQCB reviewed SWPPP on 11/26/13. As part of our new NPDES Stormwater Permit, we sent RWQCB an updated SWPPP in June 2018.
66	E.17.b	<p>Spill Prevention, Control, and Countermeasure Plan ("SPCCP"). The Operator shall maintain and implement all provisions of a spill prevention, control, and countermeasure plan ("SPCCP") which meets the requirements of the Local California Unified Program Agency and the United States Environmental Protection Agency. The operator shall provide the director and the fire chief with a copy of the SPCCP and any future modifications, revisions, or alterations thereof, or replacements therefore.</p>	FM O&G provided DRP and the Los Angeles County Fire Department (LACFD) a copy of the most up-to-date SPCC on 08/15/16. This is the most recent SPCC plan and was not changed in 2018.
67	E.17.c	<p>Hydrological Analysis. A site-specific hydrologic analysis shall be completed to evaluate anticipated changes in drainage patterns and associated increased runoff at the site for any new grading that results in the loss of vegetated, sandy, permeable ground areas, which could alter surface runoff at the site. The analysis shall be completed consistent with Standard Urban Stormwater Mitigation Plan regulations, as specified in the county department of public works Hydrology Manual as amended. The hydrological analysis shall be submitted to the director of public works for review and approval. The new grading that required the hydrologic analysis shall not occur until approval of the analysis by the director of public works.</p>	The hydrologic analysis has not occurred to date because no oil field projects have triggered the requirement.
68	E.18	<p>Water Management Plan. The operator shall comply with all provisions of a water management plan that has been approved by the director and the director of public works. The plan shall include best management practices, water conservation measures, the use of a drip irrigation system, and shall include provisions for the use of surface water runoff in the retention basins for dust suppression and landscaping. The plan shall also address the availability of reclaimed water for use at the oil field. The water management plan shall be reviewed by the operator every three years to determine if modifications to the plan are required. The operator shall make changes to the plan if requested by the director or the director of public works. Any modifications to the water management plan shall be submitted to the director and the director of public works for review and approval. The water management plan shall include any elements requested by the director or the director of public works. In addition, the operator shall comply with the water conservation measures and reporting requirements specified in Sections 20.09.020- 20.09.080, Title 20 of the County Code (Utilities).</p>	The Water Management Plan was initially submitted in May 2009 and was formally approved by County Public Works on August 8, 2012 and the County DRP on September 13, 2012. The County has not required any changes to the Plan since then. The Operator reviewed the Water Management Plan on 09/19/18 and determined that no changes are necessary. The next triennial review will occur in September of 2021.

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69	E.19 G.7 (2015)	<p>E.19: Groundwater Monitoring. The operator shall develop, implement, and carry out a groundwater quality monitoring program for the oil field that is acceptable to the director and consistent with all requirements of the Regional Water Quality Control Board. Pursuant to the approved program, the operator shall install and maintain groundwater monitoring wells in the vicinity of each surface water retention basin, which is permitted by the Regional Water Quality Control Board. Such monitoring wells shall be completed to the base of the permeable, potentially water bearing, alluvium, Lakewood Formation, and San Pedro Formation, and to the top of the underlying, non-water bearing Pica Formation, as determined by a California-certified professional geologist. The Regional Water Quality Control Board and the director shall be regularly advised of the results of such monitoring and shall be immediately advised if such monitoring indicates a potential problem.</p> <p>G.7: The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "the Operator coordinate with the RWQCB and install additional groundwater monitoring wells if deemed necessary."</p>	<p>Quarterly groundwater sampling was conducted on a quarterly basis consistent with the provisions of the Groundwater Monitoring Program and Work plan, and monitoring reports were submitted to DRP and the Los Angeles Regional Water Quality Control Board (RWQCB) quarterly.</p> <p>As noted in G.7 (2015), the RWQCB submitted a comment letter to DRP on 10/17/12 regarding the 2013 Annual Drilling Plan (E.26.c) that recommended the installation of "an up-gradient groundwater quality monitoring well (or network) that can establish water quality conditions at the perimeter of the field." Subsequently, in 2013, the RWQCB evaluated the field's groundwater monitoring program as part of the land treatment unit permit renewal process. The permit was amended from the prior 2010 permit to reflect the following:</p> <ul style="list-style-type: none"> <li>• Shallow wells for semi-annual monitoring (rather than the quarterly monitoring previously required in the 2010 permit) include MW-2, 3, 5, 6, 7, 8 and 9;</li> <li>• A new requirement for deep well annual monitoring of MW 11B and 13.</li> <li>• A new requirement to conduct statistical analysis of the results of the groundwater quality monitoring to identify background conditions, and changes from background conditions (if any).</li> </ul> <p>Regulatory action triggers were established in the event that changes from background conditions are detected.</p> <p>As such, through the 2013 land treatment unit permit renewal process, the RWQCB re-evaluated and on 2/7/13 approved the groundwater monitoring program with changes as iterated above that respond to their concerns in their 10/17/12 comment letter. Therefore, this periodic review recommendation has been fulfilled. For 2018, Quarterly Groundwater Monitoring was conducted each quarter as described in the monitoring reports submitted to CSD and dated April, July, &amp; October 2018, and January 2019.</p>
70	E.20 G.7 (2015)	<p>Fencing. All portions of the oil field on which oil operations are conducted shall be enclosed with a fence compliant with DOGGR regulations codified at California Code of Regulations Title 14, Article 3, sections 1778 and 1779, or as may be subsequently amended by the state.</p> <p>G.7: The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "the ECC and the Operator increase monitoring of the condition of the perimeter fencing and conduct any necessary repairs as soon as possible.</p>	<p>The Inglewood Oil Field is enclosed by fencing and gates compliant with the regulations cited in this provision. Both SPR and the ECC monitored the perimeter fencing on a regular basis to ensure the integrity of the fencing is maintained.</p>
71	E.21.a SA.12	<p>E.21.a: Equipment Removal. All facilities that have reached the end of their useful economic life shall be properly decommissioned and removed from the oil field within one year. Areas not slated for future use shall be restored and revegetated within 90 days of termination of use, unless such restoration and revegetation would interfere with fire safety or access to oil operations.</p> <p>SA.12: Clean-Up Plan. The CSD requires PXP to decommission and remove facilities that have reached the end of their useful economic life (County Code section 22.44.142.E.21.a) and submit to the County for its approval an unused or abandoned equipment removal plan (County Code section 22.44.142.L.14). PXP has submitted such a plan in 2009 and shall periodically update the plan should additional equipment, not identified in PXP's original removal plan, become unused or abandoned. Equipment and materials not necessary to oil field operations as identified by the Director of Planning shall be promptly removed from view of Sensitive Developed Areas as addressed in the plan.</p>	<p>The equipment removal plan was reviewed January 2019 and submitted to DRP on 1/31/19. No equipment became unused or abandoned since.</p>
72	E.21.b	<p>Equipment Maintenance. All equipment, improvements, facilities, and other personal property or fixtures located on the oil field shall be maintained in good condition to the satisfaction of the director and the director of public works.</p>	<p>Equipment at the oil field is inspected and maintained by the field operations staff with operators completing rounds of the facility daily.</p>
73	E.21.c	<p>Site Debris and Vegetation. The operator shall keep the property free of debris and vegetation overgrowth to the satisfaction of the director. All outside storage of parts or equipment shall comply with Part 7 of Chapter 22.52 of the County Code.</p>	<p>The Inglewood Oil Field is kept free of debris and vegetation overgrowth.</p>
74	E.22	<p>Security. All unmanned entrances to the oil field shall be equipped with sliding gates which shall be kept closed at all times except when authorized vehicles are entering or leaving the oil field. The operator shall have a security guard on duty 24 hours per day.</p>	<p>All gates at the oil field are consistent with these regulations and all unmanned entrances are equipped with the required sliding type gates.</p>
75	E.23	<p>Vehicle Parking. Vehicular parking shall comply with Part 11 of Chapter 22.52 of County Code.</p>	<p>All vehicle parking complies with the referenced code.</p>

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76	E.24.a	Sanitation. The operator shall comply with the following provisions: a. Garbage and Refuse. The oil field shall be maintained in a clean, sanitary condition, free from accumulations of garbage, refuse, and other wastes.	The field is maintained in accordance with this provision. Garbage and refuse are picked up and removed weekly by a subcontractor garbage collection company.
77	E.24.b	Toilets and Wash Facilities. Sanitary toilet and washing facilities shall be installed at any site where personnel are permanently stationed. Portable facilities shall be provided wherever crews are temporarily employed. Such facilities shall be maintained in a clean and sanitary condition at all times.	Permanent toilet and wash facilities are located at the office building, the warehouse, the gas plant, the "halfway house" across from the gas plant, and at two modular buildings used by sub-contractors. The restroom facilities are maintained by a sub-contractor janitorial service. Portable facilities are located throughout the field and moved as needed, the portable restrooms are maintained by the subcontractor providing the units.
78	E.25	Storage of Hazardous Materials. The operator shall comply with all provisions of a hazardous materials business plan that has been submitted to the fire chief. The operator shall deliver to the fire chief for review and approval an updated hazardous material business plan on an annual basis. This plan shall provide the location of where hazardous materials are stored at the oil field. Hazardous materials shall be stored in an organized and orderly manner and identified as may be necessary to aid in preventing accidents, and shall be reasonably protected from sources of external corrosion or damage to the satisfaction of the fire chief.	The annual Hazardous Materials Business Plan was submitted to the LA County Fire Chief on 4/16/2018.
79	E.26.a	DOGGR Regulations. All DOGGR regulations related to drilling, redrilling, and reworking operations.	Drilling, redrilling and reworking operations are in compliance with all applicable DOGGR regulations; however, no drilling or redrilling occurred in 2018.
80	E.26.b SA 3	E.26.b: Number of Drilling and Redrilling Rigs. No more than three drilling or redrilling rigs shall be present within the oil field at any one time. SA 3: Notwithstanding the CSD's allowance for operations of a maximum of three drill rigs at any one time on the Oil Field, PXP shall limit to two the number of drill rigs in use at any one time.	The approved 2018 Drilling Plan required per Section E.26.c limits SPR to two drilling rigs, and no more than two drilling rigs have been - or plan to be - used at any one time on the Oil Field.
81	E.26.c SA 1	Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan. Before the end of each calendar year, the operator shall develop and deliver to the director an annual drilling, redrilling, well abandonment, and well pad restoration plan, which shall describe all drilling, redrilling, well abandonment, and well pad restoration activities that may be conducted during the upcoming calendar year. Drilling and redrilling shall be scheduled to avoid over concentration of such activities in that year in any one area if located near a developed area. The operator may at any time submit to the director proposed amendments to the then current annual plan. No drilling, redrilling, or abandonment activity may be commenced unless it is described in a current annual plan (or an amendment thereto) which has been approved by the director. The annual plan (and any amendments) shall be provided to the CAP for review and comment. All comments on the annual plan from the CAP shall be submitted to the director in writing, and, if timely submitted, will be considered as part of the director's review and approval. The director shall complete the review of the annual plan (and any amendments) within 45 days of receipt, and shall either approve the annual plan or provide the operator with a list of deficiencies. The annual plan shall comply with the provisions of this subsection, and shall include the following:...	The 2019 Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan (Plan) was submitted to the County in October 2018 and was approved on 12/10/2018.
82	E.26.c SA 1	1. Slant Drilling. a. Deep Zone Wells. b. Mid-Zone Wells. c. Shallow Wells. d. Supplement Review. e. Definitions f. Environmental Consideration. g. Non-interference.	The 2018 Drilling Plan did not included any Deep zone or Mid zone wells that would be subject to a supplement review.
83	E.26.d	Drill Rig Engines. All engines used for drilling and redrilling operations shall be operated by muffled internal-combustion engines or by electric motors.	No drilling or redrilling activities occurred in 2018.

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84	E.26.e	Fire Safety Regulations. All drilling, redrilling, and reworking shall be in conformance with applicable fire and safety regulations.	No drilling or redrilling activities occurred in 2018.
85	E.26.f SA 6	E. 26.f: New Technology. Proven reasonable and feasible technological improvements which are capable of reducing the environmental impacts of drilling and redrilling shall be considered as they become, from time to time, available. SA 6: Clean Technology Assessment. The CSD requires PXP to consider proven reasonable and feasible technological improvements which are capable of reducing the environmental impacts of drilling and redrilling. (County Code section 22.44.142.E.26.f) The CSD also requires that the Annual Drilling Plan include a discussion of the latest equipment and techniques that are proposed for use as part of its drilling and redrilling program to reduce environmental impacts. (County Code section 22.44.142.E.26.c.ix) Pursuant thereto, PXP shall address in each Annual Drilling Plan the availability and feasibility of the use of natural gas-powered drill rigs or other technology capable of reducing environmental impacts, for the drilling of wells proposed in the Annual Drilling Plan (collectively "Clean Technology"). During the Periodic Review provided in 22.44.142 G.7, the County will evaluate such technology for brand new equipment that PXP intends to lease, acquire or otherwise use and require PXP to implement such technology to the extent the technology is feasible and available on a commercially reasonable basis.	New technology for reducing the environmental impacts of drilling and redrilling is discussed in the annual drilling plans required per E.26.c. The discussion includes an applicability overview of electric rigs, coil tubing rigs, diesel, electric rigs, and natural gas-electric rigs along with the potential feasibility of their use at the Inglewood Oil Field.
86	E.26.g	Derricks and Portable Masts. All derricks and portable masts used for drilling, redrilling, and reworking shall meet the standards and specifications of the American Petroleum Institute as they presently exist or as may be amended.	No drilling or redrilling activities occurred in 2018.
87	E.26.h	Equipment Removal. All drilling and redrilling equipment shall be removed from the site within 90 days following the completion of drilling or redrilling activities unless the equipment is to be used at the oil field within five days for drilling or redrilling operations.	No drilling or redrilling activities occurred in 2018.
88	E.26.i	Drill Site Conditions. All drilling sites shall be maintained in a neat and orderly fashion.	No drilling or redrilling activities occurred in 2018.
89	E.26.j	Belt Guards. Belt guards shall be required over all drive belts on drilling, redrilling, and reworking equipment. Guarding shall be as required by Title 8 of the California Code of Regulations, section 6622, or as may be subsequently amended.	No drilling or redrilling activities occurred in 2018.
90	E.26.c.x G.7 (2015)	E.26.c.x: The annual plan shall include the following: A topographic vertical profile showing proposed location of new wells that reflects local terrain conditions and that addresses the potential visibility of existing and proposed wells and other production facilities from residential and recreation areas. G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that the consideration of "considering removing the subject figures/maps from the Annual Drilling Plan until the information is deemed useful for inclusion in future plans."	The 2019 Drilling Plan was submitted in October 2018 and approved on 12/10/2018. There were no new wells drilled in 2018 nor are there currently any new wells proposed for 2019.
91	E.27.a	Limits on Processing Operations. Unless otherwise expressly required by DOGGR, the only processing operations permitted at the well site shall be the dehydration of oil and gas produced from the well; the storage, handling, recycling, and transportation of such materials; and those processing operations required for water injection purposes.	In 2018, the only processing that occurred at the oil field was associated with the dehydration of oil and gas; the storage, handling, recycling, and transportation of those materials; and water injection operations.
92	E.27.b	Refining. No refining shall be conducted within the oil field.	In 2018, no refining occurred within the oil field.
93	E.27.c	Well Pump Motors. All well pumping units shall be operated by electric motors.	In 2018, all well pump motors at the oil field were powered electrically.
94	E.27.d	Well Pumps. Downhole submersible pumps and low-profile pumping units for production wells must be used wherever feasible.	In 2018, downhole submersible pumps and low-profile pumping units for production wells were used wherever feasible.

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95	E.27.e	Removal by Pipeline Only. All oil, gas, and other hydrocarbons produced from any well in the oil field shall be shipped and transported through pipelines, except in case of an emergency or when access to a pipeline becomes unavailable. Excluded from this requirement are propane and other related natural gas liquids that are in amounts in excess of what can be blended into the pipeline. Should any pipeline through which oil or gas is currently transported become unavailable for the safe transportation of said products due to maintenance problems with the pipeline, or lack of sufficient capacity within the pipeline to handle the volume of oil and gas needing transportation, or because the owner or operator of such pipeline elects to discontinue transporting oil or gas through such pipeline, then the operator shall within 180 days of the date the existing pipeline becomes unavailable, seek to acquire a private right of way or easement, or shall file an application for a right of way, easement, encroachment permit, or franchise for the construction of a replacement pipeline and shall diligently prosecute such application until such pipeline is completed. During any emergency situation, or during such time as any existing pipeline becomes unsafe or unavailable, oil and gas may be transported by truck until the emergency situation is resolved or until a replacement pipeline shall be permitted and constructed in compliance with all applicable laws and regulations.	In 2018, all oil, gas, and other hydrocarbons produced in the oil field were shipped and transported via pipelines, and all natural gas liquids were blended into the oil and transported by pipeline.
96	E.27.f	Pipelines. The operator shall comply with the following provisions: i. New pipelines that remove oil or gas from the oil field shall be buried below the surface of the ground; ii. All pipelines which are not enclosed within a fence shall be placed underground or covered with materials approved by the fire chief. Said covers shall be maintained in a neat, orderly, and secure manner; iii. Any and all water or brine produced during pipeline construction shall either be injected in accordance with DOGGR requirements, or disposed of in accordance with other local, state or federal regulations; iv. New pipeline corridors shall be consolidated with existing pipelines or electrical transmission corridors where feasible; and v. Upon completion of pipeline construction, the site shall be restored to the approximate previous grade and condition.	No new pipelines that transport oil or gas from the oil field have been constructed since the adoption of the CSD. The oil field is completely fenced in with chain link fencing that meets the DOGGR requirements, thus all oil field pipelines are also enclosed by a fence. All water or brine generated at the oil field is injected in accordance with DOGGR requirements. Pipeline construction within the oil field is consolidated to the maximum feasible in existing pipeline routes and corridors.
97	E.27.g	Active Pipeline Plot Plan. The operator shall submit to the fire chief a plot plan depicting the approximate location of all active pipelines regulated by the United States Department of Transportation or California State Fire Marshall owned by the operator that are located outside the outer boundary line, including waste water, and trunk and gathering lines to transport oil or petroleum products. The plot plan shall be submitted within 30 days of the installation of any new pipelines or the relocation of an existing pipeline.	The active pipeline plot plan was submitted to the Fire Department on December 9, 2009 and has not been required to be updated to date. As of 3/31/18 SPR no longer operates or owns any DOT or CSFM pipelines associated with Inglewood.
98	E.27.h	Machinery Enclosures. The operator shall maintain enclosures around machinery with moving parts consisting of a fence, screening, or housing. Said enclosures shall be installed in compliance with Section 11.16.020, Title 11 of the County Code.	In 2018, all enclosures around machinery subject to this provision were maintained in compliance with Section 11.16.020, Title 11 of the County Code.
99	E.27.i	Opening Protections. The operator shall cap, close, or protect the openings in all oil wells, test holes, and similar excavation in compliance with Section 11.54.010, Title 11, of the County Code.	In 2018, all openings in all oil wells, test holes, and similar excavation in compliance were capped, closed, or protected in compliance with Section 11.54.010, Title 11, of the County Code.
100	E.28.a	a. DOGGR Regulations. The operator shall comply with all DOGGR regulations related to well reworking operations.	In 2018, all DOGGR regulations related to well reworking operations were complied with.
101	E.28.b G.7 (2015)	E.28.b: Number of Reworking Rigs. No more than eight reworking rigs shall be present within the oil field at any one time, unless an emergency condition requires additional Reworking rigs. This does not include equipment used for well maintenance or well abandonment. G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "the Operator facilitate better coordination when scheduling reworking and the other types of rigs at the oil field to avoid concentrating too many rigs in one area.	In 2018, no more than four reworking rigs were present on the oil field at any one time not including equipment used for well maintenance and well abandonment. In 2018 SPR has ensured that reworking rigs are not overconcentrated in one area.
102	E.28.c	Hours of Operation. With exception of emergencies, well reworking operations shall not be allowed after 7:00 p.m. or before 7:00 a.m., nor on Sundays or legal holidays.	In 2018, reworking rigs did not operate outside 7:00 am to 7:00 pm or on Sundays or legal holidays except in emergencies.

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103	E.28.d	Specifications. Reworking rigs shall meet the standards and specifications of the American Petroleum Institute.	In 2018, all reworking rigs met the standards and specifications of the American Petroleum Institute.
104	E.28.e	Equipment Removal. Reworking rigs shall be removed from the oil field within seven days following the completion of reworking operations unless such rig will be used on another well at the oil field within five days.	In 2018, all reworking rigs were removed from the oil field within seven days following completion of the operations unless it was scheduled for use at another well within five days.
105	E.29.a	New Tank Specifications. All new tanks and appurtenances shall be designed, constructed, installed, and maintained in accordance with current County Fire Code, American Petroleum Institute, DOGGR, California Division of Industrial Safety, Environmental Protection Agency Standards, applicable provisions of Title 14 of the California Code of Regulations section 177 4, and applicable CalARP Program requirements.	No new tanks were constructed in 2018.
106	E.29.b	Setbacks. No new storage Tank, excluding a replacement tank, shall be constructed closer than 500 feet from any developed area, or closer than 200 feet from a public road. No building shall be constructed within 50 feet of any oil storage tank.	No new tanks were constructed in 2018. No new buildings were constructed within 50 feet of any oil storage tank in 2018.
107	E.29.c	Vapor Recovery. Oil, wash, and produced water tanks shall be vapor tight and shall be equipped with a vapor recovery system.	In 2018, all oil, wash and produced water tanks were vapor tight and equipped with a vapor recovery system.
108	E.29.d	Specifications for New Tank Piping, Valves, Fittings, and Connections. All new tank piping, valves, fittings, and connections including normal and emergency relief venting, shall be installed and maintained in accordance with current American Petroleum Institute standards to the satisfaction of SCAQMD and DOGGR.	In 2018, all equipment covered by this provision were installed and maintained in accordance with current API standards to the satisfaction of SCAQMD and DOGGR.
109	E.29.e	Detection of Tank Bottom Leaks. The operator shall design, implement, and comply with a program, approved by the fire chief, for controlling and detecting tank bottom leaks on all tanks at the oil field. The operator may use a combination of methods including but not limited to diversion walls, dikes, tank foundations of concrete or gravel, and a tank bottom leak detection system in compliance with Title 14 of the California Code and Regulations section 1773, or subsequently enacted state regulations regarding tank bottom leaks.	All tanks at the Inglewood Oil Field have a program to detect tank bottom leaks as approved by the Fire Department on 2/18/10 in the Tank Leak Detection and Containment Plan.
110	E.30	Well and Production Reporting. The operator shall deliver annual production reports to the director and the fire chief. The reports shall provide the following information: a. A copy of all DOGGR Forms 110 and 110B submitted during the previous 12 months. b. Number and mapped location of wells drilled or redrilled, including well identification numbers. c. Number and mapped location of water injection wells, including well identification numbers. d. Number and mapped location of idled wells, including well identification numbers and the date each well was idled. e. Number and mapped location of abandoned wells, including date each well was abandoned and/or re-abandoned. f. Any additional information requested by the director or the fire chief.	The 2018 well and production reporting was submitted to the DRP and Fire Chief in February 2019.
111	E.31	Idle Well Testing and Maintenance. The operator shall comply with Title 14 of the California Code of Regulations section 1723.9 regarding testing and maintenance of idle wells, or subsequently enacted state regulations regarding testing and maintenance of idle wells. The operator shall carry out all additional tests, remedial operations, and mitigation measures required by DOGGR if any idle wells do not meet the test standards.	In 2018, all required testing and maintenance of idle wells was carried out in accordance with all applicable regulations.
112	E.32	Abandoned Well Testing. The operator shall conduct annual hydrocarbon vapor testing of areas within the oil field that contain abandoned wells. The testing shall be done using a soil gas vapor probe, or another method approved by the director. The results of the testing shall be submitted to the director and DOGGR on an annual basis. Abandoned wells that are found to be leaking hydrocarbons that could affect health and safety shall be reported to the director and DOGGR within 24 hours of the abandoned well test. If directed by DOGGR, the operator shall re-abandon the well in accordance with DOGGR rules and regulations. If the test results for an abandoned well area are at or below the background levels for two consecutive years that area shall thereafter be tested every five years.	The 2018 abandoned well testing will be submitted to the DRP and DOGGR in March 2019.

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113	E.33	<p>Well and Well Pad Abandonment. If DOGGR orders the operator to plug and abandon any wells on the oil field, the operator shall deliver to the fire department, on a timely basis, all notices of intent to plug and abandon a well that the operator files with DOGGR and shall commence promptly and proceed diligently with the plugging and abandonment operations in accordance with DOGGR rules and regulations and the terms of the DOGGR permit to plug and abandon the well. Well abandonment may commence once all necessary permits and approvals are obtained. If the well pad associated with the abandoned well does not contain other production, injection, or idle wells, and will not be used for future drilling, then the operator shall promptly abandon the well pad consistent with the following provisions:</p> <p>Closure of Sumps. The operator shall clean out all sumps, cellars, and ditches, and level and fill all sumps and depressions pursuant to DOGGR requirements. If sumps are lined with concrete, bottoms and walls shall be broken up and removed. Sumps shall be closed in accordance with Regional Water Quality Control Board and California Department of Toxic Substances Control requirements.</p> <p>b. Well Pad Site Cleanup. The operator shall leave the site entirely free of oil, rotary mud, oil-soaked earth, asphalt, tar, concrete, litter, debris, and other substances to the satisfaction of DOGGR and in compliance with federal requirements.</p> <p>c. Contaminated Materials. All contaminated soils and materials within the well pad boundaries shall be removed and treated or disposed of in accordance with all local, county, State, and federal regulations.</p> <p>d. Well Pad Revegetation. The Well pad shall be revegetated following the requirement of the native habitat restoration plan.</p>	<p>DOGGR has not ordered any wells to be plugged or abandoned pursuant to this requirement. The oil field does not contain any sumps and sumps are no longer used at the oil field. Existing well pads have been cleaned up but are not scheduled for abandonment or restoration so they may be re-used to avoid the impact of developing new well pad areas.</p>
114	E.34	<p>County Request for Review of Well Status. The director may periodically review the status of the operator's wells and submit to DOGGR a list of wells the director believes should be plugged and abandoned as specified in Public Resources Code section 3206.5 or any subsequently enacted state law related to a local jurisdiction's right to request state-agency review of idle wells.</p>	<p>The County has not requested that DOGGR require the Operator to plug or abandon any wells pursuant to this provision.</p>
115	E.35 SA 14	<p>E.35: Reduced Throughput Triggering Review. When oil or gas throughput is less than 630 barrels per day, the director shall conduct a public hearing to determine if shut down of the oil field or other action are appropriate.</p> <p>SA 14: CSD Review Based On Reduced Production. When production drops to three percent of the estimated peak production of 21,000 barrels of oil per day, the County will review the CSD to consider whether modifications or closure of the Oil Field is necessary or appropriate or at such earlier date as the County determines appropriate.</p>	<p>The oil field has not reached the production levels that trigger this review and this provision has not been activated to date.</p>
116	E.36	<p>Abandonment Procedures. Within 180 days of permanent facility shut down, the operator shall submit an abandonment plan to DOGGR and submit to the director for review and approval a time line for facility removal, site assessment, and remediation as necessary. The operator shall begin abandonment of the site no later than 20 days after the director's approval of the timeline, and shall provide to the director quarterly updates on the abandonment process until such time as the oil field is abandoned and remediated. The operator shall post a performance bond to insure compliance with all provisions of this subsection and the operators and landowners shall continue to pay property taxes at the rates assessed during oil field operation until all site restoration work has been fully completed, as determined by the director.</p>	<p>The facility has not shut down; hence, this provision is not applicable to date.</p>

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117	F.1.a, b	<p>Environmental Quality Assurance Program ("EQAP"). The operator shall comply with all provisions of an environmental quality assurance program that has been approved by the director. The following provisions relate to the EQAP:</p> <p>a. EQAP Requirements. The EQAP shall provide a detailed description of the steps the operator shall take to assure compliance with all provisions of this section, including but not limited to, all of the monitoring programs called for by this section.</p> <p>b. Annual EQAP Reports. Within 60 days following the end of each calendar year, the operator shall submit to the director an annual EQAP report that reviews the operator's compliance with the provisions of the EQAP over the previous year and addresses such other matters as may be requested by the director. The annual EQAP report shall include the following:</p> <p>i. A complete list and description of any and all instances where the provisions of the EQAP, or any of the monitoring programs referred to therein or in this section, were not fully and timely complied with, and an analysis how compliance with such provisions can be improved over the coming year.</p> <p>ii. Results and analyses of all data collection efforts conducted by the operator over the previous year pursuant to the provisions of this section.</p>	<p>This 2018 annual EQAP report was submitted on 03/09/2019.</p>
118	F.1.c	<p>EQAP Updates. The EQAP shall be updated as necessary and submitted to the director for approval along with the annual EQAP report. The EOAP updates shall be provided to the CAP and MACC for review and comment. Comments from the CAP and MACC, if timely received, shall be considered by the director before making a decision to approve the same. The director shall complete the review of EQAP updates as soon as practicable, and shall either approve the updated EOAP or provide the operator with a list of specific items that must be included in the EOAP prior to approval. The operator shall respond to any request for additional information within 30 days of receiving such request from the director, unless extended by the director.</p>	<p>The EQAP was approved by the County in February 2009 and was revised on August 25, 2009. No updates have been necessary to date.</p>
119	F.2	<p>Environmental Compliance Coordinator. The operator shall recommend and fund the environmental compliance coordinators. The number of environmental compliance coordinators shall be determined by the county and shall take into account the level of oil operations at the oil field. The environmental compliance coordinator(s) shall be approved by, and shall report to, the director. The responsibilities of the environmental compliance coordinator(s) shall be set forth in implementation guidelines that may be developed by the county for the oil field and shall generally include:</p> <p>a. On-site, day-to-day monitoring of construction or drilling and re-drilling activities as determined by the director.</p> <p>b. Taking steps to ensure that the operator, and all employees, contractors, and other persons working in the oil field, have knowledge of, and are in compliance with all applicable provisions of this section.</p> <p>c. Evaluating the adequacy of drilling, re-drilling, and construction impact mitigations, and proposing improvements to the operator or contractors and the county.</p> <p>d. Reporting responsibilities to the various county agencies with oversight responsibility at the oil field, as well as other agencies such as DOGGR, and SCAQMD.</p>	<p>An ECC position has been funded by the operator as required by this provision since the adoption of the CSD. The ECC site inspections are coordinated with oil field management to gain access to oil field staff, oil field contractors and for access to the oil field to check on the compliance provisions of the CSD. The ECC also participates in reviewing and commenting of all plans submitted by the Operator in compliance with the CSD.</p>
120	F.3.a	<p>Safety Inspection, Maintenance, and Quality Assurance Program ("SIMQAP"). The operator shall comply with all provisions of a safety inspection, maintenance, and quality assurance program that has been approved by the director and the fire chief.</p> <p>a. SIMQAP Requirements. The SIMQAP shall, at a minimum provide for:</p> <p>i. Inspection of construction techniques;</p> <p>ii. Regular maintenance and safety inspections;</p> <p>iii. Periodic safety audits;</p> <p>iv. Corrosion monitoring and leak detection; and</p> <p>v. Inspections of all trucks carrying hazardous and/or flammable material prior to loading.</p>	<p>The SIMQAP was approved on 4/13/2011. The Revised SIMQAP was approved by LA County Fire Department on 6/8/2016, is implemented and ongoing.</p>



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121	F.3.b	SIMQAP Updates. The operator shall periodically review and revise the SIMQAP to incorporate changes in procedures, and new safety and maintenance technologies and procedures. The operator shall make such revisions at least every five years, or more frequently, if the operator determines changes are necessary or if requested by the director or the fire chief. The operator shall submit SIMQAP updates to the director and the fire chief for their review and approval. The director shall complete the review of SIMQAP updates as soon as practicable, and shall either approve the updated SIMQAP or provide the operator with a list of specific items that must be included in the SIMQAP prior to approval. The operator shall respond to any request for additional information within 30 days of receiving such request from the director, unless extended by the director.	The SIMQAP was approved on 4/13/2011. The Revised SIMQAP was approved by LA County Fire Department on 6/8/2016, is implemented and ongoing.
122	F.3.c	Worker Notification. The operator shall ensure that all persons working on the oil field comply with all provisions of the currently approved SIMQAP.	All persons working on the oil field in 2018 received SIMQAP training.
123	F.3.d	Inspections. The SIMQAP shall provide for involvement of county staff or the environmental compliance coordinator in all inspections required by this section.	The approved SIMQAP provides for the involvement of County staff or the ECC in all required inspections.
124	F.4	Annual Emergency Response Drills of the County and Culver City Fire Departments. The operator shall demonstrate the effectiveness of the emergency response plan by responding to one planned emergency response drill per year which shall be conducted in conjunction with the county and Culver City fire departments. Emergency response drills required by other agencies that involve the county and Culver City fire departments can be used to satisfy this provision. In addition, the operator shall demonstrate the effectiveness of the emergency response plan by responding to not more than two unannounced drills each year which may be called by the county fire department at the oil field. If critical operations are then underway at the oil field, the operator need not respond to a unannounced drill to the extent such a response would, as a result of such critical operations, create an undue risk of personal injury or property damage, but in such case the operator must promptly explain the nature of the critical operations, why response is not possible, and when the critical operations will be completed.	The 2018 emergency response drill was conducted on March 14, 2018. Representatives from both LA County and Culver City Fire Departments representatives attended. The County ECC and representatives from the California Department of Fish and Wildlife also attended and participated in the drill.
125	F.5	Noise Monitoring. The public health department shall retain an independent qualified acoustical engineer to monitor ambient noise levels in the areas surrounding the oil field as determined necessary by the director or the director of public health. The monitoring shall be conducted unannounced and within a time frame specified by the director or the director of public health. Should noise from the oil operations exceed the noise thresholds specified in this section, no new drilling or redrilling permits shall be issued by the county until the operator in consultation with the director and director of public health identifies the source of the noise and the operator takes the steps necessary to assure compliance with thresholds specified in this section. The results of all such monitoring shall be promptly posted on the oil field web site and provided to the CAP.	No exceedances of the noise regulations in the County Code or of the noise limits specified subsection E.5.a of the CSD have been reported to SPR by the DPH.
126	F.6	Vibration Monitoring. The public health department shall retain an independent qualified acoustical engineer to monitor vibration in the areas surrounding the oil field as determined necessary by the director or the director of public health. The monitoring shall be conducted unannounced and within a time frame specified by the director or the director of public health. Should vibration from the oil operations exceed the vibration thresholds specified in this section, no new drilling or redrilling permits shall be issued by the county until the operator in consultation with the director and director of public health identifies the source of the vibration and the operator takes the steps necessary to assure compliance with thresholds specified in this section. The results of all such monitoring shall be promptly posted on the oil field web site and provided to the CAP. A telephone number by which persons may contact the operator at all times to register complaints regarding oil operations shall be posted in the main entrance sign to the facility and included in the annual newsletter required by subsections J.2.b and on the oil field web site required by subsection J.2.c.	No exceedances of the vibration criteria specified in subsection E.6. of the CSD have been reported to SPR by DPH.

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127	F.7	Complaints. All complaints related to oil operations received by the operator shall be reported on the same business day to the environmental compliance coordinator and to the director. In addition, the operator shall maintain a written log of all complaints and provide that log to the director, the MACC, and CAP on a quarterly basis. Depending upon the nature of the complaint, the operator shall report the complaint to the SCAQMD, DOGGR, and any other appropriate agencies with oversight authority regarding the complaint at issue. If the complaint is received after normal business hours, it shall be reported to the environmental compliance coordinator and the agencies at the opening of the next business day.	All complaints received were reported to the ECC, DRP as well as other appropriate agencies with oversight of the matter in compliance with the timing of this policy. Quarterly complaint logs were submitted to the ECC and the DRP quarterly and are posted at <a href="http://www.inglewoodoilfield.com">www.inglewoodoilfield.com</a> .
128	G.1	Costs of Implementing Monitoring and Enforcing Conditions. The operator shall be fully responsible for all reasonable costs and expenses incurred by the county or any county contractors, consultants, or employees, in implementing, monitoring, or enforcing this section, including but not limited to, costs for permitting, permit condition implementation, mitigation monitoring, reviewing and verifying information contained in reports, undertaking studies, research and inspections, administrative support, and including the fully burdened cost of time spent by county employees on such matters.	SPR has made timely payments on all CSD monitoring and enforcement costs to the County through the draw down account required by CSD Provision G.2. All costs from the implementation of the CSD, permit processing, mitigation monitoring, compliance report research, review and verification, inspections, and administrative costs have been paid by the SPR from this account.
129	G.2	Draw-Down Account. The operator shall maintain a draw-down account with the department of regional planning from which actual costs will be billed and deducted for the purpose of defraying the expenses involved in the county's review and verification of the information contained in any required reports and any other activities of the county, including but not limited to, enforcement, permitting, inspection, coordination of compliance monitoring, administrative support, technical studies, and the hiring of independent consultants. The initial amount to be deposited by the operator shall be \$500,000. In the first year, if withdrawals from the account have reduced its balance to less than 50 percent of the amount of the initial deposit (\$250,000), the operator shall deposit \$50,000 in supplemental funds within 30 business days of notification. After the first year, if the balance in the draw-down account is reduced at any time to \$50,000, the operator shall deposit \$50,000 in supplemental funds on each occasion that the account is reduced to \$50,000 or less within 30 business days of notification. There is no limit to the number of supplemental deposits that may be required. At the discretion of the operator, the amount of an initial or supplemental deposit may exceed the minimum amounts specified in this subsection. The director may, from time to time, increase the minimum \$50,000 figure to account for inflation or the county's experience in obtaining funds from the account.	The draw-down account has been maintained at or above the \$50,000 balance as required by this requirement. A deposit to the account in 2018 occurred on 4/10/2018.
130	G.3	Indemnification. The operator shall enter into an agreement with the county to indemnify and hold harmless the county, its elected and appointed officials, agents, officers, and employees from any claim, action, or proceeding for damages arising from its oil operations, including water, air or soil contamination, health impacts, or loss of property value during the oil operations, well abandonment, and post-abandonment activities with terms approved by, and in a form acceptable to, the CEO.	The required agreement was documented in a letter signed by the operator and the County dated August 16, 2017, the agreement is on file with the County.
131	G.4	Insurance Requirements. Within 90 days following the effective date of the ordinance creating this section or such later time as may be approved by the director for good cause shown, and without limiting the operator's indemnification of the county as required in the preceding subsection, the operator shall provide evidence of insurance coverage that meets county requirements as required and approved by the CEO including identifying the county and its elected and appointed officers and employees as additional insureds. Such coverage shall be maintained so long as oil operations are conducted within the district and until such time as all abandonment requirements are met and certified by the appropriate local, state, and federal agencies. Such insurance coverage shall include but is not necessarily limited to the following: general liability, auto liability, professional liability, and environmental impairment liability coverage insuring clean-up costs and endorsing for 'Sudden and Accidental contamination or pollution. Such coverage shall be in an amount sufficient to meet all applicable state and federal requirements, with no special limitations. At the operator's request and only with county approval by the CEO, the operator may self-insure all or any part of the above coverage obligations in lieu of purchasing commercial coverage. These insurance requirements shall be in addition to all other indemnification, insurance and performance security required by federal, state, and local regulations and permits.	PXP, the operator at the time of CSD adoption, provided the County with an insurance policy meeting the liability and environmental impairment liability requirements of this provision on January 18, 2010. SPR updated this insurance to reflect the change in operator on January 18, 2018.

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132	G.5.a	Performance Bond. Prior to issuance of the first drilling or redrilling permit pursuant to this section, the operator shall provide to the department of regional planning a faithful performance bond or financial instrument in the sum to be determined by the CEO, payable to the county and executed by a corporate surety acceptable to the county and licensed to transact business as a surety in the state of California. Such bond shall be conditioned upon the faithful performance by the operator of duties related to well abandonment, site restoration, and environmental cleanup and shall be in a format and include terms approved by the CEO.	SPR obtained Performance Bond No. B010359 for the benefit of Baldwin Hills Community Standards District of the County of Los Angeles, as Obligee with the Executed Date of December 14, 2016 and Effective Date of Change of November 3, 2017.
133	G.5.b	Change of Operator. The performance bond shall continue in force for one year following any sale, transfer, assignment, or other change of operator of the oil field, or of the current operator's termination of activities at the oil field. The county may release said bond prior to the end of the one-year period upon satisfaction by the operator of all its obligations. Notwithstanding the foregoing, the performance bond shall not be terminated or released upon the sale, transfer, assignment, or other change of operator until the new operator has delivered a replacement bond complying with the provisions of this subsection G.	It is SPR's understanding that this bond is based upon anticipated end of life remaining liabilities that may be present. This bond exceeds the liability of remediation cost analyses and should be adequate to provide the necessary coverage.
134	G.5.c	Funding Options. At its sole option, the county may accept certificates of deposit, cash deposits, or U.S. government securities in lieu of commercial bonds to meet the above bonding requirements on terms approved by the CEO.	This provision is not applicable since SPR provided a performance bond in accordance with G.5.a.
135	G.6	Other Obligations. The insurance, indemnification, and performance security requirements in subsections G.3, G.4, and G.5 shall be in addition to all other indemnification, insurance, and performance security required by federal, state and local regulations, and permits.	The condition is administrative in its intent and is fully implemented.
136	G.7	<p>Periodic Review. The county shall conduct a comprehensive review of the provisions of this section at least every five years to determine if the provisions of this section are adequately protecting the health, safety, and general welfare. Such reviews shall, among other things, consider whether additional provisions should be added, appended, or removed. One of the main goals of the periodic review shall be to evaluate if proven technological advances that would further reduce impacts of oil operations on neighboring land uses should be incorporated into the provisions of this section.</p> <p>a. Review Requirements. Each review shall include a report by a hearing officer designated by the director, which shall be prepared after public notice and an opportunity for public comment. The report shall include a comprehensive analysis of the effectiveness of this section, and shall review and consider enforcement activity, operational records, and any other issues relating to oil operations. The report, at the option of the county, may include a survey of residents near the oil field regarding noise, odors, vibrations, and other issues requested by the director of public health. A draft of the report shall be provided to the CAP and the operator for review and comment. All comments on the draft report from the CAP and the operator shall be submitted to the hearing officer in writing, and will be considered, if timely received, before the report is finalized. The final report by the hearing officer shall include a recommendation as to whether the director should prepare proposed amendment to this section for submission to the board of supervisors.</p> <p>b. Early Reviews. At the discretion of the director, reviews of this section may be conducted more frequently than every five years. Without limiting such discretion, the director shall consider whether an early review should be undertaken if more than three material violations occur within any 12-month period.</p> <p>c. Initial Review. The initial review shall occur no sooner than three years and no later than five years after the effective date of the ordinance establishing this section unless the director determines that such initial annual review shall occur at an earlier time pursuant to subsection b, above.</p>	The County released a five year review report in February 2014. The draft report was circulated for review and comment to both the CAP, members of the public, other agencies and the operator. Comments on the draft report were considered in the preparation of the administrative final draft released on 06/25/15. The administrative final draft was discussed at the July 2015 CAP meeting, and on 09/24/15, the final draft was issued. The report was prepared consistent with the five year time frame requirement stipulated in CSD Provision G.7.c. On 10/28/15, Los Angeles County DRP issued a letter to FM O&G verifying the conclusion of the Periodic Reivew Final Report dated September 2015 that the provisions of the CSD have been effective and that no modification to the current language of the CSD is recommended.

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137	G.8	<p>Multiple Agency Coordination Committee ("MACC"). A MACC shall be established to coordinate activities and communications between the various agencies with regulatory authority over the oil operations within the district. While each agency will continue to make its own decisions with regard to their respective areas of authority, the MACC will allow for collection and analysis of data and for discussion of both strategic evaluations and enforcement actions taken by the various agencies at the oil field.</p> <p>a. MACC Members. The director shall establish a MACC that includes representatives from the following agencies: the county department of regional planning, the county fire department, the county department of public works, and the county department of public health. The SCAQMD, the Regional Water Quality Control Board, DOGGR, and Culver City fire department shall be invited to appoint a representative from their agency as a member of the MACC.</p> <p>b. MACC Chair. The director or his designee shall chair the MACC meetings and shall coordinate all MACC activities including scheduling and keeping minutes of MACC meetings.</p> <p>c. MACC Meetings. The MACC shall determine its meeting schedule.</p> <p>d. Documents Provided to the MACC. Copies of all monitoring and compliance reports, plans, and other documents that are requirements of this section shall be submitted to the MACC.</p>	<p>A MACC was established in 2009, and the MACC conducts periodic meetings. All monitoring and compliance reports are provided to the MACC.</p>
138	G.9	<p>Related County Code Provisions. The county code contains a number of provisions related to oil wells and oil field operations. Where the regulations of this section differ from any other provisions in the county code, these regulations shall supersede unless the contrary provisions are mandated by state law.</p>	<p>The provision is a standard County requirement to clarify jurisdiction on similar code and regulations.</p>
139	H.1 SA 4	<p>H.1: Director's Review Required. The operator shall apply for and receive approval of a director's review pursuant to the provisions of Part 12 of Chapter 22.56 prior to any new drilling and redrilling. New drilling and redrilling approved through a director's review procedure shall be limited to no more than 53 wells per year, with the maximum number of newly drilled wells of that total, limited to 45 per year, except that during the first year following the effective date of the ordinance establishing this section, new drilling and redrilling shall be limited to no more than 24 wells. Approval through director's review for drilling new wells shall be limited to 600 wells over 20 years, beginning on the effective date of this ordinance. Drilling and redrilling shall be planned to avoid over concentration of such activities in one area in any one year, if near developed areas. The director's review procedures shall also apply to emergency actions determined by the director as necessary to prevent an imminent hazard, or to other immediate measures required for the purposes of protecting health and safety. No new permits for drilling or redrilling shall be approved by the director unless the subject wells have been approved as part of an annual drilling plan as described in subsection E.26.c. Approval shall not be granted until copies of all related permits have been submitted to the director; other permits include, but are not limited to, the permits required by DOGGR, the county fire department; the county department of public works, the county sanitation district, RWQCB, SCAQMD, and other pertinent agencies identified by the director.</p>	<p>No new drilling or redrilling occurred in 2018.</p>

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140	H.1 SA 4	<p>SA 4: Number of wells. Notwithstanding the aggregate and annual well-drilling limits in the CSD, PXP shall comply with the following limits:</p> <p>a. Notwithstanding Section 22.44.142.H of the CSD, no more than 500 new wells (inclusive of Bonus Wells and wells drilled since approval of CSD) shall be drilled pursuant to the CSD (hereinafter "Director's Review") through October 1, 2028, or during the remaining life of the CSD, whichever is later.</p> <p>b. Until such time as PXP has drilled or redrilled 50 wells since the adoption of the CSD, or 24 months from the date of this Agreement, whichever is sooner ("Time Period One"), no more than 30 wells may be drilled or re-drilled in any calendar year pursuant to a Director's Review as set forth in the CSD (hereinafter Director's Review). At the end of Time Period One, and if the County determines, pursuant to its review of the CSD by the Director of Regional Planning, that the CSD has been effective in protecting the health, safety, and general welfare of the public, thereafter (the "Full Operational Period") no more than 35 wells may be drilled or re-drilled in the calendar year pursuant to Director's Review.</p> <p>c. In Time Period One, for each well abandoned within 800 feet of any Developed Area (the "800-foot zone") by PXP since adoption of the CSD and in full compliance with the California Department of Conservation's Division of Oil, Gas and Geothermal Resources ("DOGGR") standards for abandonment at the time of abandonment, PXP may drill two additional new wells outside of the 800-foot zone (hereinafter "Bonus Wells"), up to a maximum of 45 drilled and redrilled wells (30 wells plus 15 Bonus Wells) in any calendar year within Time Period One pursuant to Director's Review and subject to review and approval in the Annual Drilling Plan. Subject to the annual and aggregate limits on number of wells, Bonus Wells earned by abandonment may be drilled at any time during the life of the CSD.</p> <p>d. In the Full Operational Period, for each well abandoned within the 800-foot zone, PXP may drill two additional new wells outside the 800-foot zone up to a maximum of 53 drilled and re-drilled wells (35 wells plus 18 Bonus Wells) in that year pursuant to Director's Review and subject to review and approval in the Annual Drilling Plan. Subject to the aggregate and annual limits on number of wells, Bonus Wells earned by abandonment may be drilled at any time during the life of the CSD.</p> <p>e. The Developed Area as used in the CSD with respect to the 400-foot buffer zone (Section 22.44.142.E.) shall remain unchanged (static or fixed) from what it was determined to be on the effective date of the CSD.</p>	<p>Since inception of the CSD and following the installation of 50 new wells, the Settlement Agreement allows SPR to apply to the County for approval to install up to 35 new wells per year. SPR's predecessor applied for this well increase on 10/10/2011 and was granted approval by the County on 12/12/2011.</p> <p>Since inception of the CSD through 6/30/2014, 127 wells have been drilled and 32 wells have been abandoned; of which 20 were within 800 feet of Developed Areas.</p> <table border="1" data-bbox="1768 521 2260 813"> <thead> <tr> <th colspan="3">Number of Wells Drilled Since Inception of the CSD</th> </tr> <tr> <th>YEAR</th> <th>NUMBER OF WELLS</th> <th>BONUS WELLS USED</th> </tr> </thead> <tbody> <tr> <td>2009</td> <td>0</td> <td>0</td> </tr> <tr> <td>2010</td> <td>19</td> <td>0</td> </tr> <tr> <td>2011</td> <td>40</td> <td>5</td> </tr> <tr> <td>2012</td> <td>20</td> <td>0</td> </tr> <tr> <td>2013</td> <td>30</td> <td>0</td> </tr> <tr> <td>2014</td> <td>18</td> <td>0</td> </tr> <tr> <td>2015-18</td> <td>0</td> <td>0</td> </tr> <tr> <td><b>Total</b></td> <td><b>127</b></td> <td><b>5</b></td> </tr> </tbody> </table>	Number of Wells Drilled Since Inception of the CSD			YEAR	NUMBER OF WELLS	BONUS WELLS USED	2009	0	0	2010	19	0	2011	40	5	2012	20	0	2013	30	0	2014	18	0	2015-18	0	0	<b>Total</b>	<b>127</b>	<b>5</b>
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141	H.2 - 3	<p>H.2: Conditional Use Permit Required. Provided a conditional use permit has first been obtained as provided in Part 1 of Chapter 22.56, and while such permit is in full force and effect in conformity with the conditions of such permit, the following uses may be established:</p> <p>a. Drilling or redrilling that exceeds the maximum number allowed pursuant to a director's Review;</p> <p>b. Steam drive plant; and</p> <p>c. New tanks with a capacity of greater than 5,000 barrels.</p> <p>H.3: Conditional Use Permit Requirements. For those uses requiring a conditional use permit, in addition to the requirements of Part 1 of Chapter 22.56, the applicant shall substantiate to the satisfaction of the hearing officer that:</p> <p>a. The requested use is in compliance with the provisions of this section; and</p> <p>b. All reasonable measures were taken to reduce and minimize potential impacts from the proposed operation.</p>	<p>No conditional use permits have been applied for/obtained.</p>																														
142	H.4	<p>Application Where Violation Exists. No application required pursuant to this section shall be accepted for processing or approved where any existing use in the district is being maintained or operated by the operator or its agents in violation of any material provision of this title.</p>	<p>An NOV was issued by the LA County Dept of Regional Planning on 11/14/2018 for deficient data storage in December 2016, January 2017, and February 2017 referencing &gt; 10% missing or anomalous data. SPR submitted a revised 2017 annual audit report addressing the NOV. New sensors and a datalogger with greater retention and automated connectivity to our corporate system were put into service in May 2018. Those improvements along with adherence to the 6-month calibration cycle position the Inglewood Oil Field Meteorological Station to comply with terms of the CSD going forward. Further, this violation was not a material violation of the CSD. As such, no applications were denied for processing or approval.</p>																														

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143	I.1	<p>Civil Penalties and Performance Security. The operator shall be subject to a penalty for violation of any requirement of this section as determined by, and at the discretion of, the director in an amount not less than \$1,000 or more than \$1 0,000 per day per violation, but in no event, in an amount beyond that authorized by state law. For this purpose, the operator shall deposit the sum of \$100,000 in an interest-bearing trust fund with the department of regional planning within 30 days following the effective date of this section, to establish a draw-down account. A written notice of violation and the associated penalty will be sent to the operator in the event of a violation. If the noted violation is not corrected to the satisfaction of the director within the time period set forth in the notice of violation, the penalty amount cited in the notice of violation will be deducted from the account. If the violation is corrected within the time period set forth in the notice of violation, but recurs any time within a six-month period, the penalty will be deducted from the account upon each recurrence and the operator will be notified of such deduction. Once the deposit has been depleted by 50 percent of the initial amount (\$50,000), the operator shall deposit additional funds sufficient to bring the balance up to the amount of the initial deposit (\$1 00,000) within 10 business days of notification. There is no limit to the number of supplemental deposits that may be required while the operator conducts oil operations within the district. If the operator is dissatisfied with the action of the director, the operator may file an appeal with the hearing officer within 15 days after the date which notice is mailed. Upon receiving a notice of appeal, the hearing officer shall take one of the following actions.</p> <ul style="list-style-type: none"> <li>a. Affirm the action of the director;</li> <li>b. Refer the matter back to the director for further review with or without instructions; or</li> <li>c. Set the matter for public hearing and after hearing, affirm, modify, or reverse the action of the director.</li> </ul> <p>The decision of the hearing officer shall be final.</p>	<p>On 12/23/08, \$100,000 was deposited with the County in the interest-bearing trust fund required by this provision. SPR was not subject to any fees described in this provision; hence, the balance of this account has not changed with the exception of interest accumulation.</p>
144	I.2	<p>Access to Records and Facilities. As to any condition which requires for its effective enforcement the inspection of records or facilities by the county or its agents, the operator shall make such records available or provide access to such facilities upon reasonable notice from the county. The county agrees to keep such information confidential where required or permitted by law and requested by the operator in writing.</p>	<p>SPR has made records and facilities available for inspection by the County and its agents.</p>
145	I.3	<p>Right of Entry. Any officer or employee of the county of Los Angeles, or his or her duly appointed representative, whose duties require the inspection of the oil field premises shall have the right and privilege at all reasonable times, to enter upon any premises upon or from which any oil operations are being conducted for which any permit is required under this section, for the purpose of making any of the inspections pursuant to this section, or in any other ordinance of the county, or for any other lawful purpose, but for safety reasons, shall be accompanied by the operator or a designee of the operator and shall wear all appropriate personal protection equipment in accordance with the operator's established health and safety policies.</p>	<p>SPR has made the oil field open to authorized inspection.</p>

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146	J.1	<p>Community Advisory Panel ("CAP"). A community advisory panel shall be established by the director to foster communication about ongoing operations at the oil field and to allow the community representatives to provide input to the county and the operator.</p> <p>a. CAP Members. The CAP may include representatives of the county, the city of Los Angeles, the city of Culver City, West Los Angeles College, the operator, the landowners, and each of the major neighborhoods surrounding the oil field (including Ladera Heights, Windsor Hills, Oak Park, View Park, Culver Crest, Blair Hills, and Raintree). The operator and each of the governmental entities previously referred to may each designate a representative to the CAP. Each landowner and neighborhood organization of the surrounding communities may submit a nomination to the director for appointment to the CAP. Where there is no neighborhood organization, a community resident may make a request to the director to be appointed to the CAP. School districts with schools in the vicinity of the oil field and the lessors may make a request to the director to have a representative appointed to the CAP.</p> <p>b. CAP Meetings. The CAP shall determine its meeting schedule.</p> <p>c. Documents Provided to the CAP. A notice of availability of all monitoring and compliance reports and results, all plans, audits and studies, and any other available documents that are required by this section shall be submitted to the CAP promptly after they are prepared or otherwise available. Copies of these reports, documents, and other items shall be provided to CAP members upon request except to the extent information therein may not be legally disclosed. Prior to each CAP meeting, the county shall provide to the CAP a list of all violations of the provisions of this section that have occurred since the last CAP meeting.</p>	Documentation made available to the CAP is posted on the Inglewood Oil Field website required/described in J.2.c.
147	J.2.a G.7 (2015)	<p>J.2.a: Community Meetings. The operator shall hold community meetings on an annual basis to provide updates on oil operations.</p> <p>G.7 (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section G.7 of CSD recommended that "agendas for future Community Meetings be specific to oil field operations and issues and that measures be implemented to ensure questions from the public are addressed appropriately.</p>	The 2018 annual meeting was held on 10/20/2018, and in accordance with the G.7 (2015) recommendation, the agenda was specific to oil field operations and SPR ensured that questions from the public were addressed appropriately.
148	J.2.b	<p>Newsletter. The Operator shall publish an informational newsletter annually, which shall contain updated information on oil operations including drilling, redrilling, maintenance, repair, and reworking activities and all recently granted conditional use permits or applications filed for conditional use permits for the oil field. The newsletter shall be mailed by the operator to all owners of property located within 1,000 feet of the outer boundary line; all owners of property within 1,000 feet of the perimeter of the district as shown in the records of the county assessor's office; to any person or entity who has filed a written request therefore with the director; and to neighboring cities. The operator shall also make these newsletters available on the oil field web site. The oil field web site address shall be publicized in each newsletter.</p>	The newsletter was mailed out and posted on <a href="http://www.inglewoodoilfield.com">www.inglewoodoilfield.com</a> on 9/28/2018.
149	J.2.c	<p>Oil Field Web Site. The operator shall maintain and update on a regular basis an oil field web site that shall include information on oil operations at the oil field, including drilling and production activities. All monitoring and compliance reports and results, plans, audits and studies, and any other available documents that are required by this section (except to the extent they contain information that may not legally be disclosed) shall be promptly posted on the Oil Field Web Site in pdf format.</p>	SPR maintains the <a href="http://www.inglewoodoilfield.com">www.inglewoodoilfield.com</a> website, which includes information on the history and future of the oil field, oil field operations, operational plans, compliance plans, community and environmental sections, and information on the CSD. The web site contains over 100 documents related to operational and compliance information with the documentation posted in pdf format as required by this policy. The web site also provides contact information and includes an interactive email system to allow for direct input to SPR and for registering for email updates on oil field activities.

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150	J.3	<p>Ombudsperson. The operator shall designate employees or authorized agents to serve as ombudspersons to respond to questions and concerns concerning the oil operations. Each ombudsperson shall be familiar with all the provisions of this section and all conditions of approval related to permits and approvals issued by the county or the State of California. It shall be the further responsibility of the ombudsperson to facilitate, to the extent feasible, the prompt resolution of any issues that may arise relating to the above-stated matters or the impacts of the oil operations. The name, title, email address, and telephone number of the ombudsperson shall be posted on the oil field web site, prominently displayed in the newsletter, distributed twice per year to the CAP and MACC, and provided to any other persons requesting such information. An ombudsperson shall be available at all times, and shall respond within one hour after an initial call. An ombudsperson shall also meet at reasonable times with interested parties in an attempt to resolve issues related to oil operations. An ombudsperson shall have authority to initiate a response on behalf of the operator in all foreseeable matters. The operator shall be required to maintain a written log of all calls to the ombudspersons registering complaints or concerns regarding oil operations or other matters. The log shall include the complainant's name, date, time, phone number, nature of complaint, and the response or resolution offered. A copy of the log shall be provided to the director, the MACC, and the CAP on a quarterly basis.</p>	<p>The ombudsperson system has been in place since the adoption of the CSD and serves as primary contact between SPR and the community. The ombudsperson contact information is included in the annual newsletters and in the agendas for CAP meetings. In addition to the ombudsperson, the oil field maintains four staff members on an on-call basis to coordinate and respond to calls from the public or regulatory agencies regarding oil field operations. SPR maintains a complaint log summarizing all calls made to the ombudsperson as required by this policy.</p>
151	Section K	Modification of Development Standards.	No modifications to development standards has been applied for.
152	Section L	<p>Implementation Provisions. This subsection identifies the various implementation plans and other requirements for initial compliance with this CSD and the time frames therefor. Except as identified below, the provisions of this section shall be complied with on the effective date of the ordinance establishing this CSD. As used in this subsection, "effective date" shall mean 30 days after the board of supervisors adopts the ordinance establishing this CSD. As soon as possible after the effective date, the department of regional planning shall develop an overall implementation plan specifying the required contents or measures for each of the plans set forth below, including the inclusion of those appropriate mitigation measures indicated as necessary by the Final Environmental Impact Report for the Baldwin Hills Community Standards District to reduce environmental impacts to less than significant levels in cases where impacts can be so reduced.</p>	<p>This subsection of the CSD lists the various implementation plans and other stipulations required for initial compliance along with a submittal schedule for the subject compliance. The schedule requirements for the plan and compliance submittals required under this provision range from 30 days to two years following the effective date of the CSD (October 28, 2008). All plans and initial requirements of this CSD subsection were completed; therefore, this requirement is no longer applicable.</p>
153	SA 5	<p>Health Assessment and Environmental Justice Study. The County shall complete a Community Health Assessment of the communities surrounding the Oil Field which shall include an Environmental Justice component by June 2012 and ensure additional assessments are completed every five to seven years throughout the life of the CSD. In future Community Health Assessments, the County Department of Public Health ("Public Health") shall review other agencies' reports regarding air quality, water quality and seismic data, where feasible, in its assessment. Public Health will analyze the information by socio-economic and demographic data to accommodate and reflect an Environmental Justice component. The Community Health Assessment shall include, but not be limited to, an analysis of cancer rates, mortality rates, birth outcomes and a survey of other pertinent health indicators. The County will consult with the CAP and the Health Working Group regarding the Community Health Assessment and consider reasonable comments by the CAP and the Health Working Group. Public Health will comply with all applicable state and federal requirements including Title VI of the Civil Rights Act of 1964 and corresponding regulations, and California Government Code Section 11135 and corresponding regulations.</p>	<p>This is a County action that was completed in July 2012. The DPH has initiated work on the second study to be completed by June 2019, which is the deadline imposed by the Settlement Agreement.</p>
154	SA 7	<p>Electrical Distribution Study. The County will propose to Southern California Edison ("SCE") and the Los Angeles Department of Water and Power ("DWP") that a study be conducted in cooperation with SCE, DWP, the County and PXP regarding opportunities to streamline and consolidate electrical lines distributed throughout the Oil Field and that SCE and DWP each fund one-fourth of the cost of such study. PXP will fund one fourth of the cost of any such study. The County will fund one-fourth of the cost of any such study.</p>	<p>This is a County action, and it was reported that both SCE and DWP declined to participate with respect to funding the study.</p>



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155	SA 8	Air Quality Monitoring. Supplemental to the air monitoring required by the CSD, the County will develop and implement an air quality monitoring plan that takes into consideration review and comments from Petitioners, interested stakeholders and the public. Such air monitoring shall be designed to assess the risk of both acute and chronic exposure to air contaminants from Oil Field operations, and endeavor to determine and distinguish the source of emissions, to the extent feasible, using available and affordable monitoring technology. Such air monitoring may be performed by SCAQMD, or an independent qualified consultant selected by County, and shall be commenced within 12 months of the date of this Agreement. The protocol for the air monitoring plan shall be peer reviewed prior to commencement. The plan shall be completed, and a peer reviewed report issued, within 12 to 24 months after commencement. The County commits to spending up to \$250,000 of its own funds toward implementing the plan and shall use reasonable efforts to seek additional funding sources, if necessary, to implement the plan. PXP shall reasonably cooperate with SCAQMD, the County and/or the independent consultant regarding any and all air monitoring related to the Oil Field.	This is a County action that was completed in February 2015.
156	SA 9	Back-Up Flare. The CSD (County Code section 22.44.142.L.5.b) allows PXP to maintain its existing gas plant flare as back-up equipment at the facility's gas plant after a new flare is permitted and installed. PXP and the County agree that this provision of the CSD allows only one gas plant flare to be operated at one time at the Oil Field. PXP shall comply with said limitation of only one gas plant flare operating at one time at the Oil Field. PXP shall install and have operational the new flare within 180 days of receiving the SCAQMD permit or at such later date as approved by the Director of Regional Planning for good cause shown.	Installation of the new gas plant back-up flare was completed in 2012. The old gas plant flare remains and is maintained as a back up equipment as allowed for by CSD Provision L.5.b and the Settlement Agreement. SPR has complied with the requirement that only one flare be in operation at one time at the oil field.
157	SA 10	Well Plugs. DOGGR requires oil field operators to utilize a minimum 25-foot cement surface plug at the top of a well when abandoning any such well pursuant to Title 14 of the California Code of Regulations section 1723.5. To augment this requirement, for all wells abandoned at the Oil Field from the date of this Agreement, PXP shall utilize a total of 150-foot cement surface plug.	SPR complies with the 150 foot cement plug requirement for abandoned wells.
158	SA 13	Fracking Study. PXP shall pay for an independent consultant to conduct a study of the feasibility and potential impacts (including impacts to groundwater and subsidence) of the types of fracturing operations PXP may conduct in the Oil Field. The study will also consider PXP's historic and current use of gravel packing. Such study will be completed within twelve (12) months of the date of this Agreement. Such study and all the back-up information for such study shall be provided to a qualified peer reviewer selected by the County and PXP, who shall review the study, back-up materials, and conclusions for completeness and accuracy. PXP must provide the independent expert with all materials requested and reasonably necessary for an accurate and verifiable study. The peer reviewer will be provided with access to all the data and materials provided to the independent expert. The peer reviewer shall agree to keep all proprietary information confidential. If the peer reviewer determines that the study is materially inadequate, incomplete or inaccurate, it shall so advise PXP's consultant who will complete the study as reasonably recommended by the peer reviewer and provide the revised study to the peer reviewer within 90 days. Upon acceptance by the peer reviewer, the study and all supporting material, including comments by the peer reviewer, shall be forwarded to the County, DOGGR, the Regional Water Quality Control Board ("R WQCB"), CAP and Petitioners and be available to the public, with any proprietary information redacted.	The Hydraulic Fracturing Study – Inglewood Oil Field was completed in July 2012 with the final report dated October 10, 2012 consistent with the requirements of the Settlement Agreement. The report is available to the public on the Inglewood Oil Field web site.
159	SA 15	CSD Provisions. The CSD and all of its standards and requirements remain in full force and effect except to the extent that PXP has agreed to be limited by stricter or more rigorous controls or standards as reflected in this Agreement. Nothing herein shall limit or abrogate the County's discretion in amending the CSD, or other action pursuant to the County's legislative or police powers, to impose more restrictive requirements. This Agreement neither establishes nor abrogates any vested rights to drill new wells in the Oil Field. The County will provide written guidance on the additional limits and controls regarding operation of the Oil Field which are required by this Agreement to County staff and departments responsible for implementing the CSD and enforcing the CSD, and any other personnel the County deems necessary. The County shall recirculate this written guidance on an annual basis.	The requirements of the CSD and the Settlement Agreement remain in full effect. The County released the written guidance required by this provision via the Periodic Review report as described in CSD provision G.7 and a Settlement Agreement 2018 Compliance Report dated 10/17/2018.



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1	22.310.050.A.1 (E.1.a) 22.310.070.G (G.7) (2015)	050.A: Community Alert Notification System ("CAN"). The operator shall maintain and test on an annual basis a CAN for automatic notification of area residences and businesses in the event of an emergency arising at the oil field that could require residents or inhabitants to take shelter, evacuate, or take other protective actions. 070.G (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section 070.G of CSD recommended that "the 050.A annual Community Alert Notification (CAN) tests include interested residents."	The CAN is maintained and was tested on 12/11/2019. Interested residents were included in this test pursuant to the 070.G/Final 2015 Periodic Review Final Report recommendation on this provision.
2	22.310.050.A.2 (E.1.b)	Spill Containment Response Training. The operator shall conduct annual spill containment response training and shall at all times have available, on-site, sufficient and properly maintained equipment and/or facilities so that a spill of the entire contents from the largest oil tank on the oil field can be responded to and contained in a timely manner to reduce the likelihood that the spill reaches a catch basin.	The annual spill containment response training occurred on 03/27/2019.
3	22.310.050.A.3 (E.1.c)	Emergency Response Plan ("ERP"). The operator shall at all times maintain and fully implement and comply with all provisions of an emergency response plan and shall further ensure that the then current ERP satisfies all rules and regulations of the United States Environmental Protection Agency and California Code of Regulations relating to emergency action plans and spill prevention control and countermeasure plans, as well as the rules, regulations, and requirements of the California Office of Spill Prevention and Response. The ERP shall also satisfy the rules and regulations of the United States Department of Transportation relating to onshore pipeline spills.	SPR maintains, fully implements and complies with an ERP that is in compliance with all applicable rules and regulations of agencies with oversight of the ERP.
4	22.310.050.B.1 (E.2.a)	Emission Offsets. The operator shall obtain emission offsets or RECLAIM credits as defined and required by SCAQMD Regulations for all new or modified emission sources that require a new or modified SCAQMD permit.	No credits were needed in 2019.
5	22.310.050.B.3 (E.2.c)	Odor Minimization. At all times the operator shall comply with the provisions of an odor minimization plan that has been approved by the Director. The odor minimization plan shall include any measures requested by the Director. The plan shall provide detailed information about the facility and shall address all issues relating to odors from oil operations. Matters addressed within the plan shall include setbacks, signs with contact information, logs of odor complaints, method of controlling odors such as flaring and odor suppressants, and the protocol for handling odor complaints. The odor minimization plan shall be reviewed by the operator on an annual basis to determine if modifications to the plan are required. Any modifications to the odor minimization plan shall be submitted to the Director for review and approval.	The Odor Minimization Plan was reviewed by SPR on 12/19/2019 and it was determined that no modifications are required.
6	22.310.050.B.4 (E.2.d)	Air Monitoring Plan. At all times the operator shall comply with the provisions of an air monitoring plan that has been approved by the Director. The air monitoring plan shall include any measure requested by the Director. During drilling, redrilling, and reworking operations, the operator shall monitor for hydrogen sulfide and total hydrocarbon vapors as specified in the approved plan. Such monitors shall provide automatic alarms that are triggered by the detection of hydrogen sulfide or total hydrocarbon vapors. For drilling, redrilling, or reworking monitors, the alarms shall be audible and/or visible to the person operating the drilling, redrilling, or reworking equipment. For the gas plant monitors, the alarms shall be audible or visible to the gas plant operator. Actions to be taken shall be as follows when specified alarm levels are reached:	SPR complied with the provisions of the approved Air Monitoring Plan. Compliance was monitored by County Environmental Compliance Coordinator (ECC) site visits.



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7	22.310.050.B.4.a - d (E.2.d.i - iv)	<p>a. At a hydrogen sulfide concentration of equal to or greater than five parts per million but less than 10 parts per million, the operator shall immediately investigate the source of the hydrogen sulfide emissions and take prompt corrective action to eliminate the source. The corrective action taken shall be documented in the drilling, redrilling, or reworking log. If the concentration is not reduced to less than five parts per million within four hours of the first occurrence of such concentration, the operator shall shut down the drilling, redrilling, or reworking operations in a safe and controlled manner, until the source of the hydrogen sulfide emissions has been eliminated, unless shutdown creates a health and safety hazard.</p> <p>b. At a hydrogen sulfide concentration equal to or greater than 10 parts per million, the operator shall promptly shut down the drilling, redrilling, or reworking operations in a safe and controlled manner until the source of the hydrogen sulfide emissions has been eliminated, unless shutdown creates a health and safety hazard. The corrective action taken shall be documented in the drilling, redrilling, or reworking log. When an alarm is received, the operator shall promptly notify the County Fire Department- Health Hazardous Materials Division, the Culver City Fire Department, the Office of Emergency Services, and the SCAQMD.</p> <p>c. At a total hydrocarbon concentration equal to or greater than 500 parts per million but less than 1,000 parts per million, the operator shall immediately investigate the source of the hydrocarbon emissions and take prompt corrective action to eliminate the source. The corrective action taken shall be documented in the drilling log for drilling, redrilling, or reworking and in the gas plant log for the gas plant. If the concentration is not reduced to less than 500 parts per million within four hours of the first occurrence of such concentration, the operator shall shut down the drilling, redrilling, reworking, or gas plant operations in a safe and controlled manner, until the source of the hydrocarbon emissions has been eliminated, unless shutdown creates a health and safety hazard.</p> <p>d. At a total hydrocarbon concentration equal to or greater than 1,000 parts per million, the operator shall promptly shut down the drilling, redrilling, or reworking or gas plant operations in a safe and controlled manner, until the source of the hydrocarbon emissions has been eliminated, unless shutdown creates a health and safety hazard. The corrective action taken shall be documented in the drilling log for drilling, redrilling, or reworking and in the gas plant log for the gas plant. When an alarm is received, the operator shall promptly notify the County Fire Department- Health Hazardous Materials Division, the Culver City Fire Department, and the SCAQMD.</p>	In 2019, no notifications to The County or City of Culver City Fire Departments or AQMD were required.
8	22.310.050.B.4.e (E.2.d.v)	All the monitoring equipment shall keep a record of the levels of total hydrocarbons and hydrogen sulfide detected at each of the monitors, which shall be retained for at least five years. The operator shall, on a quarterly basis, provide a summary of all monitoring events where the hydrogen sulfide concentration was at five parts per million or higher and the total hydrocarbon concentration was at 500 parts per million or higher to the Fire Chief. At the request of the Fire Chief, the operator shall make available the retained records from the monitoring equipment.	In 2019, SPR provided the Fire Chief with quarterly reports, all of which reported zero (0) events during the respective quarter, on 4/9/19, 7/8/19, 10/11/19, and 1/9/20.
9	22.310.050.B.5 (E.2.e)	Portable Flare for Drilling. The operator shall have a gas buster and a portable flare, approved by the SCAQMD, at the oil field and available for immediate use to remove any gas encountered during drilling operations from drilling muds prior to the muds being sent to the shaker table, and to direct such gas to the portable flare for combustion. The portable flare shall record the volume of gas that is burned in the flare. The volume of gas burned in the flare shall be documented in the drilling log. The operator shall notify the Fire Chief and the SCAQMD within 48 hours in the event a measurable amount of gas is burned by the flare, and shall specify the volume of gas that was burned in the flare. No drilling or redrilling shall be conducted in areas that are known to penetrate the Nodular Shale zone unless a fully operational and properly maintained gas buster and portable flare are installed on the rig. All other drilling and redrilling operations shall be conducted so that any measurable gas that is encountered can, and will, be retained in the wellbore until the gas buster and portable flare are installed on the rig, after which the gas will be run through the system. The operator shall immediately notify the fire chief and the SCAQMD in the event any gas from drilling or redrilling operations is released into the atmosphere without being directed to and burned in the flare.	No notifications to the Fire Chief or AQMD were required In 2019.



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10	22.310.050.B.6 (E.2.f)	Oil Tank Pressure Monitoring and Venting. All oil tanks that contain or could contain oil shall have a fully operational pressure monitoring system that continuously measures and digitally records the pressure in the vapor space of each tank. The detection system shall notify the operator via an alarm when the pressure in the tank gets within 10 percent of the tank relief pressure. In the event of an alarm, the operator shall immediately take corrective action to reduce the tank pressure. The corrective action shall be documented in the operator's log. The operator shall notify the Fire Chief and the SCAQMD within 24 hours if the pressure in any tank covered by this Subsection ever exceeds such tank's relief pressure. Within seven calendar days after any tank vapor release, the operator shall report the incident to the SCAQMD as a breakdown event pursuant to Rule 430, and shall provide the Fire Chief with a written report of the event and the corrective measures undertaken and to be undertaken to avoid future oil tank vapor releases. The operator shall make any changes to such report that may be required to obtain approval from the Fire Chief and the SCAQMD, and shall promptly institute all corrective measures called for by the report.	No alarms requiring notification occurred In 2019; hence no notifications to the Fire Chief or the SCAQMD were necessary.
11	22.310.050.B.7 (E.2.g)	Odor Suppressant for Bioremediation Farms. When loading material or tilling material at the bioremediation farms, the operator shall use an odor suppressant such that no odor from the bioremediation farms can be detected at the outer boundary line.	SPR initiated operation of the LAI North biofarm in late 2019. Odor suppressants are available; however, no application of odor suppressant was necessary in 2019.
12	22.310.050.B.8 (E.2.h)	Odor Suppressant for Drilling and Redrilling Operations. The operator shall use an odor suppressant spray system on the mud shaker tables for all drilling and redrilling operations to ensure that no odors from said operations can be detected at the outer boundary line.	No drilling or redrilling activities occurred in 2019.
13	22.310.050.B.9 (E.2.i)	Closed Systems. The operator shall ensure all produced water and oil associated with production, processing, and storage, except those used for sampling only, are contained within closed systems at all times.	Closed systems were in place for all produced water and oil associated with production, processing and storage, except those used for sampling only.
14	22.310.050.B.10 (E.2.j)	Meteorological Station. The operator shall maintain and operate a meteorological station at the oil field in good operating condition and in compliance with all applicable Environmental Protection Agency ("EPA") and SCAQMD rules, regulations, and guidelines, and to the satisfaction of the Director. The operator shall conduct an audit of the meteorological station on an annual basis and submit the results of the audit to the SCAQMD and the Director. The operator shall maintain the data files for the meteorological station for a period of not less than 10 years. All such data shall be available upon request to the SCAQMD and the Director.	SPR maintains and operates a meteorological station at the field in compliance with this policy. The 2018 annual audit of the station was submitted to the County on 4/9/2019 and the 2019 annual audit is projected to be submitted in the spring or summer of 2020. SPR maintains data files for the station from CSD inception to present.
15	22.310.050.B.11 (E.2.k)	Updated Health Risk Assessment. After every five years of operation of the meteorological station, the operator shall provide the previous five years of metrological data to the SCAQMD and the Director. If the SCAQMD or the Director determines that the previous five years of metrological data from the oil field could result in significant changes to the health risk assessment that was conducted as part of the Baldwin Hills Community Standards District Environmental Impact Report, then the county may elect to re-run the health risk assessment using the previous five years of metrological data from the metrological station.	The first five years of data was submitted to the SCAQMD and the Director on 12/2/15. The next five years of data is due in 2020.
16	22.310.050.B.12 (E.2.l)	Off-Road Diesel Construction Equipment Engines. All off-road diesel construction equipment shall comply with the following provisions: a. Utilize California Air Resources Board ("CARB") EPA Certification Tier III or better certified engines or other methods approved by the CARB as meeting or exceeding the Tier III standard or Tier II certified engines as long as no drilling or redrilling occurs during construction. b. Utilize a CARB Verified Level 3 diesel catalyst. The catalyst shall be capable of achieving an 85 percent reduction for diesel particulate matter. Copies of the CARB verification shall be provided to the Director. Said catalysts shall be properly maintained and operational at all times when the off-road diesel construction equipment is in use.	All off-road diesel construction equipment engines utilized Tier III or better diesel engines plus Level 3 CARB verified diesel catalysts during all construction projects in 2019.
17	22.310.050.B.13 (E.2.m)	Drill Rig Engines. All drilling, redrilling, and reworking rig diesel engines shall comply with the following provisions: a. Utilize CARB/EPA Certification Tier II or better certified engines, or other methods approved by CARB as meeting or exceeding the Tier II standard. b. Utilize second generation heavy duty diesel catalysts capable of achieving 90 percent reductions for hydrocarbons and for particulate matter smaller than 10 microns. Said catalysts shall be properly maintained and operational at all times when the diesel engines are running.	No drilling occurred in 2019.
18	22.310.050.B.14 (E.2.n)	Drilling and Redrilling Setbacks. The following setbacks shall apply within the oil field for drilling or redrilling: a. At least 400 feet from developed areas. b. At least 20 feet from any public roadway.	All required drilling and redrilling setbacks set forth in this policy were complied with as documented in the 2019 Drilling Plan and all subsequent, individual well permits approved by the County. However, no drilling or redrilling occurred in 2019.
19	22.310.050.B.15 (E.2.o)	Construction Schedule. To reduce construction air emissions, no overlap shall be permitted in major facility construction and installation activities such as the steam drive plant, the water processing facility, or the oil cleaning plant.	There was no overlap in construction activity since no steam drive plant, water processing facility or oil cleaning plant were installed in 2019.



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20	22.310.050.B.16 (E.2.p)	Fugitive Dust Control Plan. The operator shall comply with the provisions of a fugitive dust control plan that has been approved by the Director. The plan shall be based upon the requirements of SCAQMD Rule 403 and the SCAQMD CEQA Guideline Fugitive Dust Control Measures. The fugitive dust control plan shall be reviewed by the operator every five years to determine if modifications to the plan are required. Any modifications to the fugitive dust control plan shall be submitted to the Director for review and approval. The fugitive dust control plan shall include any measured requested by the Director.	The Fugitive Dust Control Plan was submitted on March 26, 2009 and revised and approved in April 2010. Compliance with the provisions of the Plan are verified by the County ECC. The Operator reviewed the Plan on 11/21/16 and determined that no modifications to the plan are required. The County was notified of this determination on 11/21/16. Next review due in November 2021.
21	22.310.050.C.1 (E.3.a)	Natural Gas Liquid Blending. Natural gas liquids at the gas plant shall be blended with the oil to the maximum allowable pipeline system vapor pressure. Natural gas liquids storage shall be limited to the volume allowed in the risk management plan approved by the Fire Department.	SPR blends the natural gas liquids (NGLs) to the maximum allowable pipeline system vapor pressure as required by the subject CSD provision requirement. The storage of the NGL tank is in compliance with the criteria in the Risk Management Plan. The LA County Fire Department verifies compliance with this provision via site inspections.
22	22.310.050.C.2 (E.3.b)	Propane and Natural Gas Liquids Bullet Fire-Proofing. The operator shall install and maintain fire-proofing insulation on all propane and natural gas liquids bullets within the oil field. The fire-proofing insulation shall have a minimum two-hour fire rating and otherwise be acceptable to the Fire Chief. All propane and natural gas liquid bullets shall be equipped with an automatic deluge system.	The propane and natural gas liquids bullet fire proofing was completed on February 23, 2009 with the associated documentation submitted to the LA County Fire Department on February 25, 2009.
23	22.310.050.C.3 (E.3.c)	Steam Drive Plant Setback. The steam drive plant, if constructed, shall be located at least 1,000 feet from a developed area and shall use urea or equivalent, low toxicity material for any nitrogen oxide emission reduction that is required by the SCAQMD.	A steam drive plant has not been proposed or constructed to date.
24	22.310.050.C.4.a (E.3.d.i)	The operator shall ensure that all existing oil tank areas in the oil field, unless determined by the Director to be infeasible, and all the new oil tank areas shall have secondary containment (berms and/or walls) that can contain at least 110 percent of the largest oil tank volume to reduce the likelihood of oil spills entering the retention basins. In the event the Director determines that it would be infeasible to provide 110 percent containment for a particular existing oil tank, the operator shall provide such containment as the Director determines is feasible.	As documented in the Operator's 2009 Tank Leak Detection and Containment at Inglewood Oil Field report, approved in May 2009, all tanks have secondary containment per this provision.
25	22.310.050.C.4.b (E.3.d.ii)	All retention basins in the oil field shall be adequately sized, and maintained to handle a 100-year storm event plus a potential spill of the volume of the largest tank that would drain into each basin.	The Operator's Retention Basin Study, completed in March 2009 and revised in September 2009 and January 2010, analyzed and modeled the capacities of the basins along with a 100 year storm event. The study concluded that the onsite basins have the capability to handle a 100 year storm event without flooding per the CSD requirement. The study further determined that in the event of an oil tank failure during a 100 year storm event, the basin weir system would prevent oil from going offsite. The County Public Works Department has reviewed and approved the retention basin capacities.
26	22.310.050.C.4.c (E.3.d.iii)	All above ground piping in the oil field that contains or could contain oil shall be protected by basins or secondary containment measures (berms and/or walls).	Most of the above ground piping throughout the oil field is not protected by individual pipeline specific secondary containment or basin structures; however, the oil field retention basin system prevents any fluid from the above ground piping from traveling offsite.
27	22.310.050.D.1.a,b and c (E.4.a.i, ii and iii)	D. Geotechnical - 1. Grading - a. All proposed grading shall be subject to prior review and approval by the Director of Public Works. b. Grading involving up to 5,000 cubic yards and grading associated with the bioremediation farms may be undertaken pursuant to a County master grading plan stamped by a registered professional engineer and a California-certified engineering geologist and approved by the Director of Public Works. c. No slope of cut or fill shall have a gradient steeper than two to one (2:1) unless specifically approved by a site specific geotechnical report. d. Cuts and fills shall be minimized to avoid erosion and visual impacts.	SPR conducts all grading in accordance with the Master Grading Plan as approved by the LA County Department of Public Works (DPW) on April 4, 2019.
28	22.310.050.D.2.a (E.4.b.i)	A site-specific geotechnical investigation shall be completed for grading in excess of 5,000 cubic yards, unless associated with the on-site Bioremediation Farms and approved pursuant to a master grading plan approved by the Director of Public Works, and for any grading that supports or impacts a critical facility as determined by the Director. The investigation shall be completed by a California-certified engineering geologist and submitted to the Director and the Director of Public Works for review and approval, in conjunction with an application for a revised grading permit.	No grading that occurred in 2019 triggered the requirement for a site specific geotechnical investigation.
29	22.310.050.D.2.b (E.4.b.ii)	A site-specific geotechnical investigation shall be completed for all proposed permanent structures. The investigation shall include analysis and recommendations associated with potential seismically induced ground failure, such as differential settlement and lateral spreading. The geotechnical investigation shall be completed by a California-certified engineering geologist and submitted to the Director of Public Works for review and approval.	No permanent structures were proposed or built in 2019; hence no site specific geotechnical investigations were necessary.



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#	CSD Section/ Plan	CSD Language	Compliance Description
30	22.310.050.D.3.a (E.4.c.i)	The operator shall comply with all provisions of an erosion control plan that has been approved by the director. The erosion control plan shall be reviewed by the operator every two years to determine if modifications to the plan are required. Any modifications to the erosion control plan shall be submitted to the director for review and approval. The erosion control plan shall include any measures requested by the director.	The Operator's 2009 Erosion Control Plan Inglewood Oil Field was initially submitted on May 26, 2009, revised in October 2009 and approved by County Public Works in May 2010. The Operator reviewed the Erosion Control Plan on 5/18/18 and determined that no modifications to the plan are required. The next bi-annual review will occur in May of 2020.
31	22.310.050.D.4 (E.4.d)	Restoration of Slopes. Slopes shall be restored to their original grade once the use that required the grading of the slope has been discontinued. However, if restoration of a slope would negatively affect existing drainage patterns or slope stability, then the slope shall be restored to a grade that avoids these negative effects.	No grading that would negatively affect existing drainage patterns or slope stability occurred in 2019.
32	22.310.050.D.5 (E.4.e)	Ground Movement Surveys. The operator shall conduct ground movement surveys once every 12 months, or more frequently if determined necessary by the director of public works, following all provisions of a ground movement monitoring plan that is acceptable to CalGEM (formerly DOGGR) and the director of public works, that calls for both vertical and horizontal ground movement surveys, at specified survey locations within, and in the vicinity of, the oil field, utilizing high precision Global Positioning System technology, in combination with a network of ground stations (or any alternative technology specified in the ground movement monitoring plan approved by the director of public works), and following other survey methods outlined in the plan. The surveys shall be conducted by a California-licensed surveyor. The survey results shall be analyzed in relation to oil field activities, such as production, steam injection, and water flooding, taking into consideration individual oil producing zones, injection schedules, rates, volume, and pressure. The analysis shall be completed in collaboration by a California-registered professional petroleum engineer, registered geotechnical engineer, and certified engineering geologist. The results of the annual monitoring survey and analysis shall be forwarded to CalGEM and the director of public works. If requested by CalGEM or the director of public works, the operator shall make modifications to the ground movement monitoring plan. In the event that survey indicates that on-going ground movement, equal to or greater than 0.6 inches at any given location, or a lesser value determined by the director of public works is occurring in an upward or downward direction in the vicinity of or in the oil field, the operator shall review and analyze all claims or complaints of subsidence damage that have been submitted to the operator or the county by the public or a public entity in the 12 months since the last ground movement survey. Based thereon, the operator shall prepare a report that assesses whether any of the alleged subsidence damage was caused by oil operations and submit said report to CalGEM and the department of public works. The department of public works shall review the report to determine if it concurs with its conclusions. If the report concludes that damage has not been caused by oil operations, and the department of public works does not concur in that conclusion, it shall forward its conclusions to CalGEM for its review and possible action. If the report concludes that damage was caused by oil operations and the department of public works concurs with any such conclusion, the department of public works shall forward the department of public works' conclusions to CalGEM and ask CalGEM to evaluate the operator's fluid injection and withdrawal rates to determine whether adjustments to these rates may alleviate the ground movement, and if so, where in the oil field such adjustments should be made. The operator shall implement whatever adjustments in the rates of fluid injection and/or withdrawal that CalGEM determines are necessary and appropriate to alleviate any ground movement damage. The county shall promptly notify the CAP of any such action that is taken pursuant to this subsection. Injection pressures associated with secondary recovery operations (i.e., water flooding) or disposal of produced fluids shall not exceed reservoir fracture pressures as specified in Title 14 of the California Code of Regulations, section 1724.10, and as approved by the CalGEM.	Ground movement surveys have been completed as required by the approved Accumulated Ground Movement Plan. The Year 2018 annual survey was submitted on February 20, 2020 to DPW and CalGEM (formerly DOGGR). Plans are to begin surveying in March 2020 for the Year 2019 report.
33	22.310.050.D.6 (E.4.f)	Construction of Permanent Structures. No permanent structures shall be constructed in an Alquist-Priolo Fault Zone without preparation of a fault study by a California-certified engineering geologist. Following the fault study, no permanent structures shall be placed within 50 feet of a known active fault. The fault investigation report shall be submitted to the director of public works for review and approval.	No permanent structures have been constructed in an Alquist-Priolo Fault Zone since the adoption of the CSD.
34	22.310.050.D.7 (E.4.g)	Oil Field Accelerometer. The operator shall operate and maintain an accelerometer at the oil field to determine site-specific ground accelerations as a result of any seismic event in the region (Los Angeles/Orange County and offshore waters of the Santa Monica Bay and San Pedro Channel). Readings from the accelerometer shall be recorded at the oil field and transmitted in real-time to the Caltech Seismological Laboratory. The operator shall cease operations and inspect all oil field pipelines, storage tanks, and other infrastructure following any seismic event that exceeds a ground acceleration at the oil field of 13 percent of gravity (0.13 g) and promptly notify the director. The operator shall not reinstitute operations at the oil field and associated pipelines until it can reasonably be determined that all oil field infrastructure is structurally sound.	The oil field accelerometer seismic station was installed and began collecting data on May 20, 2009. The data is transmitted in real time by cell link to the CalTech Seismological Laboratory where the data is recorded and stored. The accelerometer has not measured ground acceleration in excess of the 13 percent of gravity (0.13 g) criteria of this provision to date, thus the oil field has not been required to shut in due to a ground acceleration event.





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#	CSD Section/ Plan	CSD Language	Compliance Description
35	22.310.050.D.8 (E.4.h)	Pipeline Management Plan. The operator shall maintain and implement a pipeline management plan that meets the requirements of CalGEM (formerly DOGGR) regulations.	The pipeline management plan is being maintained per CalGEM (formerly DOGGR) regulations.
36	22.310.050.D.9 (E.4.i)	Paleontological Monitor. The operator shall have a qualified paleontologist, approved by the director, monitor all rough grading and other significant ground disturbing activities in paleontological sensitive sediments. The sensitive sediments that have been identified within the oil field include the Lower to Middle Pleistocene San Pedro Formation and the Middle to Upper Pleistocene Lakewood Formation. A paleontologist will not be required on site if excavation is only occurring in artificial fill or Holocene alluvium.	In 2019, no work occurred in paleontological sensitive sediments. As such, no monitoring occurred.
37	22.310.050.E.1 (E.5.a)	22.310.050.E.1: Noise Limits. The operator shall comply with the following provisions: a. All oil operations on the oil field shall comply with the noise provisions of Chapter 12.08 of Title 12 of the County Code, with the exception of drilling, re-drilling, and reworking, which are exempt from the provisions of said chapter. b. Hourly, A-weighted equivalent noise levels associated with drilling, re-drilling, and reworking shall not elevate existing baseline levels by more than five dBA at any developed area. For daytime activities (7:00a.m. to 7:00p.m.) existing baseline noise levels shall be defined as the maximum daytime equivalent noise level (Leq) at the closest monitoring site as shown in Table 4.9.3 of the 2008 Baldwin Hills Community Standards District Environmental Impact Report. For nighttime activities (7:00 p.m. to 7:00a.m.), existing baseline noise levels shall be defined as the minimum nighttime equivalent noise level (Leq) at the closest monitoring site as shown in Table 4.9.3 of the 2008 Baldwin Hills Community Standards District Environmental Impact Report. Updated baseline noise levels may be set and additional monitoring sites may be established, from time to time by the director. In no case shall baseline noise levels include any drilling, re-drilling, or reworking operations. c. Noise produced by oil operations shall include no pure tones when measured at a developed area.	Noise monitoring to date has not identified any violations associated with oil field operations above the baseline levels of the noise limits set forth in the CSD or Settlement Agreement.
38	SA 2	a. The CSD currently provides that hourly, A-weighted equivalent noise levels associated with drilling, re-drilling and reworking wells shall not elevate baseline levels (which shall not include drilling, re-drilling or reworking operations) by more than five A-weighted decibels ("dBA") at the Oil Field boundary of any Developed Area. Instead of the referenced five dB A provision, PXP shall limit the night time (1 0 p.m. to 7 a.m.) noise levels at Developed Areas to no more than three dBA above a one-hour baseline average for the defined nighttime period, but at no time will PXP be required to maintain noise levels below the baseline nighttime noise levels. Furthermore, PXP and the County determined the baseline noise levels at four additional Oil Field boundary locations near Developed Areas, selected by PXP and the County, in addition to the seven utilized in the EIR for a total of 11 locations. If PXP violates the above noise requirements, no new drilling or re-drilling permits shall be issued by the County until PXP, in consultation with the County, identifies the source of the noise and PXP takes steps necessary to assure compliance with the above-specified threshold. b. If drilling, re-drilling or reworking operations elevate nighttime baseline noise levels by more than 10 dBA for more than 15 minutes in any one hour as independently verified and determined by the County, PXP, in consultation with the County, shall identify the cause and source of the noise and take steps to avoid such extended periods of noise elevation in the future. This provision does not negate the CSD noise limits between 7 a.m. to 10 p.m.	Noise monitoring to date has not identified any violations associated with oil field operations above the baseline levels of the noise limits set forth in the CSD or Settlement Agreement.
39	22.310.050.E.2 (E.5.b)	Backup Alarms. Backup alarms on all vehicles operating within the oil field shall be disabled between the hours of 8:00 p.m. and 8:00 a.m. During periods when the backup alarms are disabled, the operator shall employ alternate, low-noise methods for ensuring worker safety during vehicle backup, such as the use of spotters.	This provision has been implemented and is ongoing.
40	22.310.050.E.3 (E.5.c)	Quiet Mode Drilling Plan. All drilling and re-drilling on the oil field between the hours of 6:00 p.m. and 8:00 a.m. shall be conducted in conformity with a quiet mode drilling plan that has been approved by the director and the director of public health. The quiet mode drilling plan shall be reviewed by the operator every year to determine if modifications to the plan are required. The operator shall make changes to the plan if requested by the director or the director of public health. Any modifications to the quiet mode drilling plan shall be submitted to the director and the director of public health for review and approval. The quiet mode drilling plan shall include any measures requested by the director or the director of public health.	No drilling and re-drilling activities occurred in 2019. SPR reviewed the Quiet Mode Drilling Plan on 12/19/2019 and concluded that there are no modifications necessary to the plan.
41	22.310.050.E.4 (E.5.d)	Equipment Servicing. All noise producing oil field equipment shall be regularly serviced and repaired to minimize increases in pure tones and other noise output over time. The operator shall maintain an equipment service log for all noise-producing equipment.	SPR Operations maintains service records for such equipment.
42	22.310.050.E.5 (E.5.e)	Deliveries to the Oil Field. Deliveries to the oil field shall not be permitted after 8:00 p.m. and before 7:00a.m. except in cases of emergency. Deliveries on Sundays or legal holidays shall not be permitted after 8:00 p.m. or before 9:00a.m., except in cases of emergency.	This provision has been implemented and is ongoing.



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43	22.310.050.E.6 (E.5.f)	Deliveries within the Oil Field. Deliveries to areas of the oil field located within 500 feet of any residential property shall not be permitted after 5:00 p.m. or before 7:00a.m. except in cases of emergency. Deliveries to such areas on Sundays or legal holidays shall not be permitted after 5:00 p.m. and before 9:00a.m., except in cases of emergency.	This provision has been implemented and is ongoing.
44	22.310.050.E.7 (E.5.g)	Time Limits for Construction. Construction of permanent structures shall not be permitted after 7:00 p.m. and before 7:00a.m., or during Saturdays, Sundays, or legal holidays.	No construction occurs after 7:00 p.m. and before 7:00 a.m., or during Saturdays, Sundays, or legal holidays.
45	22.310.050.E.8 (E.5.h)	Construction Equipment. All construction equipment shall be selected for low-noise output. All construction equipment powered by internal combustion engines shall be properly muffled and maintained.	All construction equipment is selected to comply with this provision.
46	22.310.050.E.9 (E.5.i)	Construction Equipment Idling. Unnecessary idling of construction equipment internal combustion engines is prohibited.	All SPR construction equipment operators implement this provision.
47	22.310.050.E.10 (E.5.j)	Worker Notification. The operator shall instruct employees and subcontractors about the noise provisions of this subsection (E.5) 050.E prior to commencement of each and every drilling, redrilling, reworking, and construction operation, and shall annually certify to the director that such employees and subcontractors have been properly trained to comply with such noise provisions. The operator shall prominently post quiet mode policies at every drilling and redrilling site.	No drilling or redrilling occurred in 2019.
48	22.310.050.F (E.6)	Vibration Reduction. All oil operations on the oil field shall be conducted in a manner that minimizes vibration. Additionally, vibration levels from oil operations at the oil field shall not exceed a velocity of 0.25 mm/s over the frequency range 1 to 100 Hz at any developed area.	All operations are conducted to minimize vibration. The report prepared by the County in response to the request by PXP in October 2011 to increase the annual number of wells allowable for drilling or redrilling, the Annual Well Increase Evaluation, December 2011, includes analysis on the implementation of the vibration provision of the CSD. The report concluded that the CSD requirements have been effective at keeping vibration to a level that is considered protective of the health and general welfare of the public. Further, the draft periodic review concluded that this provision is fully effective.
49	22.310.050.G.1 (E.7.a)	Oil Spill Response. The operator shall comply with all provisions of an Emergency Response Plan ("ERP") that has been approved by the director, to protect biological species and to revegetate any areas disturbed during an oil spill or clean-up activities. The operator shall make changes to the ERP if requested by the director. Any modifications to the ERP shall be submitted to the director for review and approval. The ERP shall include any measures to protect biological species that may be requested by the director.	Since approval of the ERP by DRP, no updates have been needed or requested.
50	22.310.050.G.2 (E.7.b)	Special Status Species and Habitat Protection. The operator shall comply with all provisions of a special status species and habitat protection plan that has been approved by the director. The operator shall make changes to the plan if requested by the director. Any modifications to the plan shall be submitted to the director for review and approval. The special status species and habitat protection plan shall include any measures requested by the director.	The Special Status Species and Habitat Protection Plan was first prepared in 2009 and was approved on November 15, 2010. The plan was prepared by a County approved ecologist/biologist. Compliance with subsections E.7.b through E.7.h has been documented annually since 2010. The 2019 compliance report was submitted in January 2020.





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#	CSD Section/ Plan	CSD Language	Compliance Description
51	22.310.050.G.3,8 (E.7.c, h)	<p>3) Habitat Restoration and Revegetation Plan. Prior to any disturbance of sensitive natural habitat areas, as identified in the special status species and habitat protection plan, the operator shall hire a biologist, approved by the county, to conduct a survey of the area to determine if significant impact to sensitive natural habitat, including coastal sagebrush, coyote bush scrub, riparian scrub, and oak woodland will occur. If the biologist determines that significant impact to sensitive natural habitat will occur, then the operator shall have a county-approved restoration specialist, with expertise in southern California ecosystems and revegetation techniques, prepare a habitat restoration and revegetation plan. The plan shall be submitted to the director for review and approval. The director shall make best efforts to complete the review of the plan as expeditiously as possible and shall then either approve the plan or provide the operator with a list of specific items that must be included in the plan prior to approval. No removal of sensitive natural habitat shall occur until the plan has been approved by the director. The habitat restoration and revegetation plan shall include any measures requested by the director.</p> <p>8) Habitat Restoration. Within 60 days of completion of construction activities that have significantly impacted sensitive natural habitat, the operator shall begin habitat restoration consistent with the approved native habitat restoration and revegetation plan discussed in subsection 050.G.3. Restoration priority shall be given to areas of degraded habitat connecting areas of higher quality habitat and where restoration would produce larger corridors to support the migration and movement of wildlife. The operator shall replace any significant loss of sensitive natural habitat at the following ratios:</p> <p>a. 1:1 for each acre of coastal sagebrush or coyote bush scrub.</p> <p>b. 2:1 for each acre of riparian scrub or oak woodland.</p>	No Habitat Restoration and Revegetation Plans were necessary in 2019.
52	22.310.050.G.4,5,6,7 (E.7.d, e, f, g)	<p>4) Pre-Construction Surveys. The following surveys shall be conducted prior to any significant vegetation removal in sensitive natural habitat as identified in the special status species and habitat protection plan.</p> <p>5) Listed Plant or Wildlife Species. If federal- or State-listed plant or wildlife species are found, then the operator shall comply with all applicable United States Fish and Wildlife and California Department of Fish and Game rules and regulations.</p> <p>6) Construction Monitoring. If the pre-construction surveys find sensitive plant, wildlife species, or nesting birds, a biological monitor hired by the operator, and approved by the County, shall be on site during construction to monitor the construction activities.</p> <p>7) Tree and Riparian Scrub Removal. Removal of native or non-native trees and riparian scrub vegetation shall be scheduled, as possible, for removal outside the nesting season to avoid impacts to nesting birds. If avoidance of removal of trees or riparian scrub during the recommended periods is not possible, a county-approved biologist shall perform a survey to ensure that no nesting birds are present prior to removal. If for any reason a nest must be removed during the nesting season, the operator shall provide written documentation to the director demonstrating concurrence from the United States Fish and Wildlife Service and California Department of Fish and Game authorizing the nest relocation and a written report documenting the relocation efforts.</p>	Any required pre-construction surveys or construction monitoring that was completed in 2019 is documented in the 2019 Special Status Species and Habitat Protection Plan annual report which was submitted to DRP on 1/9/20. No listed plant or wildlife species were found.
53	22.310.050.H.1 (E.8.a)	Cone Trust House. Oil operations shall not result in impacts to the Cone Trust House	The Cone Trust House is off limits to oil field staff to prevent any impacts to the building.
54	22.310.050.H.2 (E.8.b)	050.H.2: Archaeological Training. The operator shall provide archeological training for all construction personnel who will be involved with ground disturbance activities at the oil field. All such construction personnel shall be required to participate in the training and will receive training material prepared by a qualified archaeologist prior to working on ground disturbance activities.	No construction operations occurred in 2019.
55	22.310.050.H.3 (E.8.c)	Construction Treatment Plan. The operator shall comply with all provisions of a construction treatment plan, approved by the director, to ensure that any new archeological discoveries are adequately recorded, evaluated, and, if significant, mitigated. In the event that unknown archeological artifacts are encountered during grading, clearing, grubbing, and/or other construction activities, work shall be stopped immediately in the vicinity of the find and the resource shall be evaluated by a qualified archaeologist, approved by the director. The construction treatment plan shall include any measures requested by the director.	No archaeological artifacts were encountered or uncovered In 2019.



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56	22.310.050.I (E.9)	<p>Lighting. Outdoor lighting shall be restricted to only those lights which are required by code for the lighting of building exteriors, drilling, and re-drilling rigs and for safety and security needs. In addition, the operator shall comply with the following provisions:</p> <p>1. Screening. All new point lighting sources within the oil field shall be screened and directed to confine direct rays to the oil field and to prevent offsite spillover lighting effects to the extent feasible.</p> <p>2. Lighting Plan. A detailed lighting plan shall be prepared for each new permanent structure and submitted to the director for review and approval. No work may be commenced on such permanent structure until the lighting plan therefore has been approved by the director. The lighting plan shall include any measures requested by the director.</p>	In November 2008, an assessment of all oil field lighting was completed to confirm compliance with the CSD lighting provisions and to confirm that there were no offsite lighting impacts.																								
57	22.310.050.J (E.10) SA 11 22.310.070.G (G.7) (2015)	<p>050.J: Landscaping, Visual Screening, Irrigation and Maintenance. The operator shall comply with the conceptual landscaping plan for the oil field prepared by Mia Lehrer &amp; Associates, dated October 2008, on file at the department of regional planning, which is intended to beautify and screen the oil field from adjoining residential, recreational, and institutional areas or adjacent public streets or highways. Landscaping required by this plan shall be completed in phases over a two-to five-year period as approved by the director. All landscaping on the oil field shall be routinely inspected (on at least a monthly basis) and maintained in a neat, clean, and healthful condition, including proper watering, pruning, weeding, fertilizing, and replacement of plants as needed. Litter shall also be removed on a regular basis.</p> <p>SA 11: Landscaping. Operator agrees to prepare and implement a series of landscape plans ("Landscape Plans") that enhance the Mia Lehrer Landscape Improvements Concepts plan dated November 4, 2008 to include, but not be limited to, landscaping along or near the border of the Oil Field in consultation with the County and subject to the County's approval. Operator's Landscape Plans shall be forwarded to the CAP for review.</p> <p>Operator will use best efforts to complete installation of the first two phases of the Landscape Plans along La Brea, between Stocker and Slauson, and Ladera Crest, within nine (9) months of County's final approvals of each of those first two Landscaping Plans using best landscaping practices. Operator agrees that it will complete the entire landscaping required by the County-approved Landscape Plans within three years after approval by the County of the final phase.</p> <p>070.G (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section 070.G of CSD recommended that "Operator schedule installation of the remaining 050.J landscaping phases to achieve the landscaping required by this provision in a timely manner.</p>	<p>All phases of landscaping have been submitted and approved. The schedule of approvals and work is summarized in the table below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Phase</th> <th style="text-align: center;">Plan</th> <th style="text-align: center;">Landscaping</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1-Ladera Crest View-shed North</td> <td style="text-align: center;">Approved 5/11/11</td> <td style="text-align: center;">Completed 10/20/11</td> </tr> <tr> <td style="text-align: center;">2-Windsor Hills La Brea View-shed</td> <td style="text-align: center;">Approved 10/11/11</td> <td style="text-align: center;">Completed 6/12/12</td> </tr> <tr> <td style="text-align: center;">3-La Brea View-shed East/La Cienega Blvd</td> <td style="text-align: center;">Approved 6/6/13</td> <td style="text-align: center;">Completed 12/1/18</td> </tr> <tr> <td style="text-align: center;">4-La Cienega Roadway East</td> <td style="text-align: center;">Approved 6/6/13</td> <td style="text-align: center;">Completed 11/10/16</td> </tr> <tr> <td style="text-align: center;">5-La Cienega Roadway West</td> <td style="text-align: center;">Approved 6/6/13</td> <td style="text-align: center;">Completed 11/1/15</td> </tr> <tr> <td style="text-align: center;">6-Fairfax Ave Roadway East and West</td> <td style="text-align: center;">Approved 4/19/16</td> <td style="text-align: center;">Completed 11/1/17</td> </tr> <tr> <td style="text-align: center;">7-Stocker Street Roadway North and South</td> <td style="text-align: center;">Approved 4/19/16</td> <td style="text-align: center;">Completed 12/31/18</td> </tr> </tbody> </table>	Phase	Plan	Landscaping	1-Ladera Crest View-shed North	Approved 5/11/11	Completed 10/20/11	2-Windsor Hills La Brea View-shed	Approved 10/11/11	Completed 6/12/12	3-La Brea View-shed East/La Cienega Blvd	Approved 6/6/13	Completed 12/1/18	4-La Cienega Roadway East	Approved 6/6/13	Completed 11/10/16	5-La Cienega Roadway West	Approved 6/6/13	Completed 11/1/15	6-Fairfax Ave Roadway East and West	Approved 4/19/16	Completed 11/1/17	7-Stocker Street Roadway North and South	Approved 4/19/16	Completed 12/31/18
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1-Ladera Crest View-shed North	Approved 5/11/11	Completed 10/20/11																									
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3-La Brea View-shed East/La Cienega Blvd	Approved 6/6/13	Completed 12/1/18																									
4-La Cienega Roadway East	Approved 6/6/13	Completed 11/10/16																									
5-La Cienega Roadway West	Approved 6/6/13	Completed 11/1/15																									
6-Fairfax Ave Roadway East and West	Approved 4/19/16	Completed 11/1/17																									
7-Stocker Street Roadway North and South	Approved 4/19/16	Completed 12/31/18																									
58	22.310.050.K.1 and 2 (E.11.a and b)	<p>Oil Field Waste Removal. The operator shall comply with the following provisions:</p> <p>1) Waste Collection. All drilling, re-drilling, and reworking waste shall be collected in portable steel bins compliant with United States Department of Transportation standards. Any drilling, re-drilling, and reworking wastes that are not intended to be injected into a Class II Well, as permitted by CalGEM (formerly DOGGR), shall be removed from the oil field no later than 30 days following completion of the drilling, re-drilling, and reworking. This provision does not apply to active sumps and mud pits.</p> <p>2) Waste Discharge. No oil field waste shall be discharged into any sewer, storm drain, irrigation systems, stream or creek, street, highway, or drainage canal. Nor shall any such wastes be discharged on the ground provided that the foregoing shall not prohibit the proper use of active drilling sumps and mud pits.</p>	All reworking wastes were collected in portable steel bins compliant with USDOT standards and removed from the field within 30-days of completion of the activity. No drilling or re-drilling occurred in 2019. There are no sumps or mud pits on the field. No oil field waste was discharged off site.																								
59	22.310.050.K.3 (E.11.c)	Recycling Plan. The operator shall comply with all provisions of a recycling plan that has been approved by the director. The recycling plan shall include any elements requested by the director.	The Recycling Plan was approved on October 3, 2011 and has been implemented and is ongoing.																								
60	22.310.050.L (E.12)	Construction of Private Roads. Roads and other excavations shall be designed, constructed, and maintained to provide stability of fill, minimize disfigurement of the landscape, prevent deterioration of vegetation, maintain natural drainage, and minimize erosion. Prior to construction of any new road, the operator shall prepare and submit to the director of public works for review and approval a private road construction plan. The operator shall thereafter comply with all provisions of the approved private road construction plan. All new private access roads leading off any surfaced public street or highway shall be paved with asphalt or concrete not less than three inches thick for the first 50 feet of said access road from the public street or highway.	No private roads have been constructed to date and all oil field activities utilize existing access roads.																								



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61	22.310.050.M.1-5 (E.13.a-e)	<p>Signs. All signage shall comply with Part 10 of Chapter 22.52 of Title 22. In addition, the operator shall comply with the following provisions:</p> <ol style="list-style-type: none"> <li>1. Perimeter Identification Signs. Identification signs, at intervals acceptable to the director, shall be posted and maintained in good condition along the outer boundary line fence and along the fences adjoining the public roads that pass through the oil field. Each sign shall prominently display current and reliable emergency contact information that will enable a person to promptly reach, at all times, a representative of the operator who will have the expertise to assess any potential problem and recommend a corrective course of action. Each sign shall also have the telephone number of the county department of regional planning zoning enforcement section and the number of SCAOMD that can be called if odors are detected.</li> <li>2. Main Entrance Sign. A sign shall be posted and maintained in good condition at the main entrance of the oil field prominently displaying a telephone number by which persons may contact a representative of the operator at all times to register complaints regarding oil field operations.</li> <li>3. Other Required Signs. All identification signs, warning signs, no trespassing signs, and other signs required by county, state and federal regulations shall be properly posted and maintained in all required locations and in good condition.</li> <li>4. Well Identification Signs. Well identification signs including the well name and well number shall be posted and maintained in good condition at each well location.</li> <li>5. No Littering Signs. "No littering" signs shall be prominently posted and maintained in good condition on all oil field entrance gates.</li> </ol>	<p>The installation of the signage required by this provision was completed upon approval of the Signage Plan dated January 2009 (Revision1) and approved by the County on May 18, 2009. In 2018, all required signage was updated to reflect to the name new Operator, Sentinel Peak Resources (SPR), of the oil field, and to remove the name of the previous Operator, Freeport-McMoRan Oil &amp; Gas (FM O&amp;G).</p>
62	22.310.050.N (E.14)	<p>Painting. All oil operation-related structures visible from public roadways and surrounding properties within the oil field shall be painted or otherwise surfaced or textured with a color that is compatible with the surrounding areas and has been approved by the director. The painting or other surfacing of all structures covered by this subsection shall thereafter be maintained in good condition.</p>	<p>The painting of the Inglewood Oil Field structures and equipment was completed on November 12, 2012. The paint color, licorice, was chosen with assistance of a landscape architect and was approved by the LA County Department of Regional Planning. Maintenance of the painting and coatings of the equipment and structures at the oil field is a continuous process.</p>
63	22.310.050.O (E.15) 22.310.070.G (G.7) (2015)	<p>Sumps. The operator shall comply with all of the following provisions:</p> <ol style="list-style-type: none"> <li>1. Sump Clean Out. All sumps that are used, installed, or maintained for use in connection with any well, and which have not been used for 90 days for the operation of or the drilling, redrilling, or reworking of such well or any other well in the vicinity, shall be cleaned out, and all oil, rotary mud, and rubbish removed.</li> <li>2. Sump Fencing. Around each sump of any depth, there shall be erected and continuously maintained a fence that encloses the sump and complies with the requirements of Sections 11.48.010 - 11.48.050, Title 11 of the County Code. This provision shall not apply to sumps that are constantly and immediately attended while drilling, redrilling, and reworking operations are proceeding as specified in Section 11.48.020, Title 11 of the County Code.</li> </ol> <p>070.G (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section 070.G of CSD recommended that "the Operator continue the use of metal and or plastic bins 050.O.1 and tanks consistent with current practice as the elimination of the use of below ground sumps is considered to be a significant environmental benefit.</p>	<p>There are no sumps at the Inglewood Oil Field.</p>
64	22.310.050.P.1-4 (E.16.a-d)	<p>Well Cellars. All well cellars shall be constructed in accordance with the most current American Petroleum Institute standards. In addition, the operator shall comply with the following provisions:</p> <ol style="list-style-type: none"> <li>1. Cellar Fluids. Well cellars shall be kept free of all oil, water, or debris at all times. During drilling, redrilling, and reworking, the cellar shall be kept free of excess fluids by a pump which discharges into a waste tank, mud pit, vacuum truck, or other approved disposal system.</li> <li>2. Access to Multi-Well Cellars. All multi-well cellars exceeding three feet in depth and 25 feet in length shall have two means of entrance and exit and an additional exit for every 50 feet in length thereafter. At least one means of entrance or exit for all multi-well cellars of 25 feet in length shall be a stairway constructed to California Division of Industrial Safety standards.</li> <li>3. Single-Cellar Covers. All single-cellars shall be covered with open grating and have no openings larger than three inches at any point. Covers shall be capable of supporting vehicle weight or guardrails shall be erected to prevent vehicle access.</li> <li>4. Cellar Ladder Openings. All openings for ladders through grating shall be designed to allow exit from underside without obstruction and shall be kept free of storage of any type. Said openings shall not be less than 24 inches on either side.</li> </ol>	<p>Implementation is ongoing where applicable.</p>



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65	22.310.050.Q.1 (E.17.a)	Construction Storm Water Pollution Prevention Plan ("SWPPP"). The operator shall maintain and implement all provisions of a storm water pollution prevention plan ("SWPPP") that has been inspected by the Regional Water Quality Control Board and the county department of public works. The operator shall provide the director and the director of public works with a copy of the SWPPP, and any future modifications, revisions, or alterations thereof, or replacements therefore. The SWPPP shall be updated prior to new construction activities as required by the Regional Water Quality Control Board.	The DPW was provided with the most up-to-date copy of the RWQCB reviewed SWPPP on 11/26/13. As part of our new NPDES Stormwater Permit, SPR sent RWQCB an updated SWPPP in June 2018.
66	22.310.050.Q.2 (E.17.b)	Spill Prevention, Control, and Countermeasure Plan ("SPCCP"). The operator shall maintain and implement all provisions of a spill prevention, control, and countermeasure plan ("SPCCP") which meets the requirements of the Local California Unified Program Agency and the United States Environmental Protection Agency. The operator shall provide the director and the fire chief with a copy of the SPCCP and any future modifications, revisions, or alterations thereof, or replacements therefore.	FM O&G provided DRP and the Los Angeles County Fire Department (LACFD) a copy of the most up-to-date SPCC on 08/15/16. This is the most recent SPCC plan and was updated in July 2018.
67	22.310.050.Q.3 (E.17.c)	Hydrological Analysis. A site-specific hydrologic analysis shall be completed to evaluate anticipated changes in drainage patterns and associated increased runoff at the site for any new grading that results in the loss of vegetated, sandy, permeable ground areas, which could alter surface runoff at the site. The analysis shall be completed consistent with Standard Urban Stormwater Mitigation Plan regulations, as specified in the county department of public works Hydrology Manual as amended. The hydrological analysis shall be submitted to the director of public works for review and approval. The new grading that required the hydrologic analysis shall not occur until approval of the analysis by the director of public works.	The hydrologic analysis has not occurred to date because no oil field projects have triggered the requirement.
68	22.310.050.R (E.18)	Water Management Plan. The operator shall comply with all provisions of a water management plan that has been approved by the director and the director of public works. The plan shall include best management practices, water conservation measures, the use of a drip irrigation system, and shall include provisions for the use of surface water runoff in the retention basins for dust suppression and landscaping. The plan shall also address the availability of reclaimed water for use at the oil field. The water management plan shall be reviewed by the operator every three years to determine if modifications to the plan are required. The operator shall make changes to the plan if requested by the director or the director of public works. Any modifications to the water management plan shall be submitted to the director and the director of public works for review and approval. The water management plan shall include any elements requested by the director or the director of public works. In addition, the operator shall comply with the water conservation measures and reporting requirements specified in Sections 20.09.020- 20.09.080, Title 20 of the County Code (Utilities).	The Water Management Plan was initially submitted in May 2009 and was formally approved by County Public Works on August 8, 2012 and the County DRP on September 13, 2012. The County has not required any changes to the Plan since then. The Operator reviewed the Water Management Plan on 09/19/18 and determined that no changes are necessary. The next triennial review will occur in September of 2021.



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#	CSD Section/ Plan	CSD Language	Compliance Description
69	22.310.050.S (E.19) 22.310.070.G (G.7) (2015)	<p>050.S: Groundwater Monitoring. The operator shall develop, implement, and carry out a groundwater quality monitoring program for the oil field that is acceptable to the director and consistent with all requirements of the Regional Water Quality Control Board. Pursuant to the approved program, the operator shall install and maintain groundwater monitoring wells in the vicinity of each surface water retention basin, which is permitted by the Regional Water Quality Control Board. Such monitoring wells shall be completed to the base of the permeable, potentially water bearing, alluvium, Lakewood Formation, and San Pedro Formation, and to the top of the underlying, non-water bearing Pica Formation, as determined by a California-certified professional geologist. The Regional Water Quality Control Board and the director shall be regularly advised of the results of such monitoring and shall be immediately advised if such monitoring indicates a potential problem.</p> <p>070.G: The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section 070.G of CSD recommended that "the Operator coordinate with the RWQCB and install additional groundwater monitoring wells if deemed necessary."</p>	<p>Quarterly groundwater sampling was conducted on a quarterly basis consistent with the provisions of the Groundwater Monitoring Program and Work plan, and monitoring reports were submitted to DRP and the Los Angeles Regional Water Quality Control Board (RWQCB) quarterly.</p> <p>As noted in 070.G (2015), the RWQCB submitted a comment letter to DRP on 10/17/12 regarding the 2013 Annual Drilling Plan (050.Z.3) that recommended the installation of "an up-gradient groundwater quality monitoring well (or network) that can establish water quality conditions at the perimeter of the field." Subsequently, in 2013, the RWQCB evaluated the field's groundwater monitoring program as part of the land treatment unit permit renewal process. The permit was amended from the prior 2010 permit to reflect the following:</p> <ul style="list-style-type: none"> <li>• Shallow wells for semi-annual monitoring (rather than the quarterly monitoring previously required in the 2010 permit) include MW-2, 3, 5, 6, 7, 8 and 9;</li> <li>• A new requirement for deep well annual monitoring of MW 11B and 13.</li> <li>• A new requirement to conduct statistical analysis of the results of the groundwater quality monitoring to identify background conditions, and changes from background conditions (if any).</li> </ul> <p>Regulatory action triggers were established in the event that changes from background conditions are detected.</p> <p>As such, through the 2013 land treatment unit permit renewal process, the RWQCB re-evaluated and on 2/7/13 approved the groundwater monitoring program with changes as iterated above that respond to their concerns in their 10/17/12 comment letter. Therefore, this periodic review recommendation has been fulfilled. For 2019, Quarterly Groundwater Monitoring was conducted each quarter as described in the monitoring reports submitted to CSD and dated April, July, &amp; October 2019, and January 2020.</p>
70	22.310.050.T (E.20) 22.310.070.G (G.7) (2015)	<p>Fencing. All portions of the oil field on which oil operations are conducted shall be enclosed with a fence compliant with CalGEM (formerly DOGGR) regulations codified at California Code of Regulations Title 14, Article 3, sections 1778 and 1779, or as may be subsequently amended by the state.</p> <p>the</p> <p>070.G: The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section 070.G of CSD recommended that "the ECC and the Operator increase monitoring of the condition of the perimeter fencing and conduct any necessary repairs as soon as possible.</p>	<p>The Inglewood Oil Field is enclosed by fencing and gates compliant with the regulations cited in this provision. Both SPR and the ECC monitored the perimeter fencing on a regular basis to ensure the integrity of the fencing is maintained.</p>
71	22.310.050.U.1 (E.21.a) SA.12	<p>050.U.1: Equipment Removal. All facilities that have reached the end of their useful economic life shall be properly decommissioned and removed from the oil field within one year. Areas not slated for future use shall be restored and revegetated within 90 days of termination of use, unless such restoration and revegetation would interfere with fire safety or access to oil operations.</p> <p>SA.12: Clean-Up Plan. The CSD requires the operator to decommission and remove facilities that have reached the end of their useful economic life (County Code section 22.44.142.E.21.a) and submit to the County for its approval an unused or abandoned equipment removal plan (County Code section 22.44.142.L.14). The PXP has submitted such a plan in 2009 and shall periodically update the plan should additional equipment, not identified in PXP's original removal plan, become unused or abandoned. Equipment and materials not necessary to oil field operations as identified by the Director of Planning shall be promptly removed from view of Sensitive Developed Areas as addressed in the plan.</p>	<p>The equipment removal plan was reviewed January 2020 and submitted to DRP on 1/9/2020. No equipment became unused or abandoned since.</p>
72	22.310.050.U.2 (E.21.b)	<p>Equipment Maintenance. All equipment, improvements, facilities, and other personal property or fixtures located on the oil field shall be maintained in good condition to the satisfaction of the director and the director of public works.</p>	<p>Equipment at the oil field is inspected and maintained by the field operations staff with operators completing rounds of the facility daily.</p>
73	22.310.050.U.3 (E.21.c)	<p>Site Debris and Vegetation. The operator shall keep the property free of debris and vegetation overgrowth to the satisfaction of the director. All outside storage of parts or equipment shall comply with Part 7 of Chapter 22.52 of the County Code.</p>	<p>The Inglewood Oil Field is kept free of debris and vegetation overgrowth.</p>



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74	22.310.050.V (E.22)	Security. All unmanned entrances to the oil field shall be equipped with sliding gates which shall be kept closed at all times except when authorized vehicles are entering or leaving the oil field. The operator shall have a security guard on duty 24 hours per day.	All gates at the oil field are consistent with these regulations and all unmanned entrances are equipped with the required sliding type gates.
75	22.310.050.W (E.23)	Vehicle Parking. Vehicular parking shall comply with Part 11 of Chapter 22.52 of County Code.	All vehicle parking complies with the referenced code.
76	22.310.050.X.1 (E.24.a)	Sanitation. The operator shall comply with the following provisions: 1. Garbage and Refuse. The oil field shall be maintained in a clean, sanitary condition, free from accumulations of garbage, refuse, and other wastes.	The field is maintained in accordance with this provision. Garbage and refuse are picked up and removed weekly by a subcontractor garbage collection company.
77	22.310.050.X.2 (E.24.b)	Toilets and Wash Facilities. Sanitary toilet and washing facilities shall be installed at any site where personnel are permanently stationed. Portable facilities shall be provided wherever crews are temporarily employed. Such facilities shall be maintained in a clean and sanitary condition at all times.	Permanent toilet and wash facilities are located at the office building, the warehouse, the gas plant, the "halfway house" across from the gas plant, and at two modular buildings used by sub-contractors. The restroom facilities are maintained by a sub-contractor janitorial service. Portable facilities are located throughout the field and moved as needed, the portable restrooms are maintained by the subcontractor providing the units.
78	22.310.050.Y (E.25)	Storage of Hazardous Materials. The operator shall comply with all provisions of a hazardous materials business plan that has been submitted to the fire chief. The operator shall deliver to the fire chief for review and approval an updated hazardous material business plan on an annual basis. This plan shall provide the location of where hazardous materials are stored at the oil field. Hazardous materials shall be stored in an organized and orderly manner and identified as may be necessary to aid in preventing accidents, and shall be reasonably protected from sources of external corrosion or damage to the satisfaction of the fire chief.	The annual Hazardous Materials Business Plan was submitted to the LA County Fire Chief on 6/6/2019.
79	22.310.050.Z.1 (E.26.a)	CalGEM (formerly DOGGR) Regulations. All CalGEM (formerly DOGGR) regulations related to drilling, redrilling, and reworking operations.	Drilling, redrilling and reworking operations are in compliance with all applicable CalGEM (formerly DOGGR) regulations; however, no drilling or redrilling occurred in 2019.
80	22.310.050.Z.2 (E.26.b) SA 3	050.Z.2: Number of Drilling and Redrilling Rigs. No more than three drilling or redrilling rigs shall be present within the oil field at any one time. SA 3: Notwithstanding the CSD's allowance for operations of a maximum of three drill rigs at any one time on the Oil Field, the operator shall limit to two the number of drill rigs in use at any one time.	The approved 2019 Drilling Plan required per Section 050.Z.3 limits SPR to two drilling rigs, and no more than two drilling rigs have been - or plan to be - used at any one time on the Oil Field.
81	22.310.050.Z.3 (E.26.c) SA 1	Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan. Before the end of each calendar year, the operator shall develop and deliver to the director an annual drilling, redrilling, well abandonment, and well pad restoration plan, which shall describe all drilling, redrilling, well abandonment, and well pad restoration activities that may be conducted during the upcoming calendar year. Drilling and redrilling shall be scheduled to avoid over concentration of such activities in that year in any one area if located near a developed area. The operator may at any time submit to the director proposed amendments to the then current annual plan. No drilling, redrilling, or abandonment activity may be commenced unless it is described in a current annual plan (or an amendment thereto) which has been approved by the director. The annual plan (and any amendments) shall be provided to the CAP for review and comment. All comments on the annual plan from the CAP shall be submitted to the director in writing, and, if timely submitted, will be considered as part of the director's review and approval. The director shall complete the review of the annual plan (and any amendments) within 45 days of receipt, and shall either approve the annual plan or provide the operator with a list of deficiencies. The annual plan shall comply with the provisions of this subsection, and shall include the following:...	The 2020 Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan was submitted to the County in November 2019 and was approved on 12/23/2019.
82	22.310.050.Z.3 (E.26.c) SA 1	1. Slant Drilling. a. Deep Zone Wells. b. Mid-Zone Wells. c. Shallow Wells. d. Supplement Review. e. Definitions f. Environmental Consideration. g. Non-interference.	The 2020 Drilling Plan did not included any Deep zone or Mid zone wells that would be subject to a supplement review.





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83	22.310.050.Z.4 (E.26.d)	Drill Rig Engines. All engines used for drilling and re-drilling operations shall be operated by muffled internal-combustion engines or by electric motors.	No drilling or re-drilling activities occurred in 2019.
84	22.310.050.Z.5 (E.26.e)	Fire Safety Regulations. All drilling, re-drilling, and reworking shall be in conformance with applicable fire and safety regulations.	No drilling or re-drilling activities occurred in 2019.
85	22.310.050.Z.6 (E.26.f) SA 6	050.Z.6: New Technology. Proven reasonable and feasible technological improvements which are capable of reducing the environmental impacts of drilling and re-drilling shall be considered as they become, from time to time, available. SA 6: Clean Technology Assessment. The CSD requires the operator to consider proven reasonable and feasible technological improvements which are capable of reducing the environmental impacts of drilling and re-drilling. (County Code section 22.44.142.E.26.f) The CSD also requires that the Annual Drilling Plan include a discussion of the latest equipment and techniques that are proposed for use as part of its drilling and re-drilling program to reduce environmental impacts. (County Code section 22.44.142.E.26.c.ix) Pursuant thereto, the operator shall address in each Annual Drilling Plan the availability and feasibility of the use of natural gas-powered drill rigs or other technology capable of reducing environmental impacts, for the drilling of wells proposed in the Annual Drilling Plan (collectively "Clean Technology"). During the Periodic Review provided in 22.44.142 G.7, the County will evaluate such technology for brand new equipment that the operator intends to lease, acquire or otherwise use and require the operator to implement such technology to the extent the technology is feasible and available on a commercially reasonable basis.	New technology for reducing the environmental impacts of drilling and re-drilling is discussed in the annual drilling plans required per 050.Z.6. The discussion includes an applicability overview of electric rigs, coil tubing rigs, diesel, electric rigs, and natural gas-electric rigs along with the potential feasibility of their use at the Inglewood Oil Field.
86	22.310.050.Z.7 (E.26.g)	Derricks and Portable Masts. All derricks and portable masts used for drilling, re-drilling, and reworking shall meet the standards and specifications of the American Petroleum Institute as they presently exist or as may be amended.	No drilling or re-drilling activities occurred in 2019.
87	22.310.050.Z.8 (E.26.h)	Equipment Removal. All drilling and re-drilling equipment shall be removed from the site within 90 days following the completion of drilling or re-drilling activities unless the equipment is to be used at the oil field within five days for drilling or re-drilling operations.	No drilling or re-drilling activities occurred in 2019.
88	22.310.050.Z.9 (E.26.i)	Drill Site Conditions. All drilling sites shall be maintained in a neat and orderly fashion.	No drilling or re-drilling activities occurred in 2019.
89	22.310.050.Z.10 (E.26.j)	Belt Guards. Belt guards shall be required over all drive belts on drilling, re-drilling, and reworking equipment. Guarding shall be as required by Title 8 of the California Code of Regulations, Section 6622, or as may be subsequently amended.	No drilling or re-drilling activities occurred in 2019.
90	22.310.050.Z.3.i (E.26.c.x) 22.310.070.G (G.7) (2015)	050.Z.3.i: The annual plan shall include the following: A topographic vertical profile showing proposed location of new wells that reflects local terrain conditions and that addresses the potential visibility of existing and proposed wells and other production facilities from residential and recreation areas. 070.G (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section 070.G of CSD recommended that the consideration of "considering removing the subject figures/maps from the Annual Drilling Plan until the information is deemed useful for inclusion in future plans."	The 2020 Drilling Plan was submitted in November 2019 and approved on 12/23/2019. There were no new wells drilled in 2019 nor are there currently any new wells proposed for 2020.
91	22.310.050.AA.1 (E.27.a)	Limits on Processing Operations. Unless otherwise expressly required by CalGEM (formerly DOGGR), the only processing operations permitted at the well site shall be the dehydration of oil and gas produced from the well; the storage, handling, recycling, and transportation of such materials; and those processing operations required for water injection purposes.	In 2019, the only processing that occurred at the oil field was associated with the dehydration of oil and gas; the storage, handling, recycling, and transportation of those materials; and water injection operations.
92	22.310.050.AA.2 (E.27.b)	Refining. No refining shall be conducted within the oil field.	In 2019, no refining occurred within the oil field.
93	22.310.050.AA.3 (E.27.c)	Well Pump Motors. All well pumping units shall be operated by electric motors.	In 2019, all well pump motors at the oil field were powered electrically.
94	22.310.050.AA.4 (E.27.d)	Well Pumps. Downhole submersible pumps and low-profile pumping units for production wells must be used wherever feasible.	In 2019, downhole submersible pumps and low-profile pumping units for production wells were used wherever feasible.



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95	22.310.050.AA.5 (E.27.e)	Removal by Pipeline Only. All oil, gas, and other hydrocarbons produced from any well in the oil field shall be shipped and transported through pipelines, except in case of an emergency or when access to a pipeline becomes unavailable. Excluded from this requirement are propane and other related natural gas liquids that are in amounts in excess of what can be blended into the pipeline. Should any pipeline through which oil or gas is currently transported become unavailable for the safe transportation of said products due to maintenance problems with the pipeline, or lack of sufficient capacity within the pipeline to handle the volume of oil and gas needing transportation, or because the owner or operator of such pipeline elects to discontinue transporting oil or gas through such pipeline, then the operator shall within 180 days of the date the existing pipeline becomes unavailable, seek to acquire a private right of way or easement, or shall file an application for a right of way, easement, encroachment permit, or franchise for the construction of a replacement pipeline and shall diligently prosecute such application until such pipeline is completed. During any emergency situation, or during such time as any existing pipeline becomes unsafe or unavailable, oil and gas may be transported by truck until the emergency situation is resolved or until a replacement pipeline shall be permitted and constructed in compliance with all applicable laws and regulations.	In 2019, all oil, gas, and other hydrocarbons produced in the oil field were shipped and transported via pipelines, and all natural gas liquids were blended into the oil and transported by pipeline.
96	22.310.050.AA.6 (E.27.f)	Pipelines. The operator shall comply with the following provisions: a. New pipelines that remove oil or gas from the oil field shall be buried below the surface of the ground; b. All pipelines which are not enclosed within a fence shall be placed underground or covered with materials approved by the fire chief. Said covers shall be maintained in a neat, orderly, and secure manner; c. Any and all water or brine produced during pipeline construction shall either be injected in accordance with CalGEM (formerly DOGGR) requirements, or disposed of in accordance with other local, state or federal regulations; d. New pipeline corridors shall be consolidated with existing pipelines or electrical transmission corridors where feasible; and e. Upon completion of pipeline construction, the site shall be restored to the approximate previous grade and condition.	No new pipelines that transport oil or gas from the oil field have been constructed since the adoption of the CSD. The oil field is completely fenced in with chain link fencing that meets the CalGEM (formerly DOGGR) requirements, thus all oil field pipelines are also enclosed by a fence. All water or brine generated at the oil field is injected in accordance with CalGEM requirements. Pipeline construction within the oil field is consolidated to the maximum feasible in existing pipeline routes and corridors.
97	22.310.050.AA.7 (E.27.g)	Active Pipeline Plot Plan. The operator shall submit to the fire chief a plot plan depicting the approximate location of all active pipelines regulated by the United States Department of Transportation or California State Fire Marshall owned by the operator that are located outside the outer boundary line, including waste water, and trunk and gathering lines to transport oil or petroleum products. The plot plan shall be submitted within 30 days of the installation of any new pipelines or the relocation of an existing pipeline.	The active pipeline plot plan was submitted to the Fire Department on December 9, 2009 and has not been required to be updated to date. As of 3/31/18 SPR no longer operates or owns any DOT or CSFM pipelines associated with Inglewood.
98	22.310.050.AA.8 (E.27.h)	Machinery Enclosures. The operator shall maintain enclosures around machinery with moving parts consisting of a fence, screening, or housing. Said enclosures shall be installed in compliance with Section 11.16.020, Title 11 of the County Code.	In 2019, all enclosures around machinery subject to this provision were maintained in compliance with Section 11.16.020, Title 11 of the County Code.
99	22.310.050.AA.9 (E.27.i)	Opening Protections. The operator shall cap, close, or protect the openings in all oil wells, test holes, and similar excavation in compliance with Section 11.54.010, Title 11, of the County Code.	In 2019, all openings in all oil wells, test holes, and similar excavation in compliance were capped, closed, or protected in compliance with Section 11.54.010, Title 11, of the County Code.
100	22.310.050.BB.1 (E.28.a)	1. CalGEM (formerly DOGGR) Regulations. The operator shall comply with all CalGEM (formerly DOGGR) regulations related to well reworking operations.	In 2019, all CalGEM (formerly DOGGR) regulations related to well reworking operations were complied with.
101	22.310.050.BB.2 (E.28.b) 22.310.070.G (G.7) (2015)	050.BB.2: Number of Reworking Rigs. No more than eight reworking rigs shall be present within the oil field at any one time, unless an emergency condition requires additional Reworking rigs. This does not include equipment used for well maintenance or well abandonment. 070.G (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section 070.G of CSD recommended that "the Operator facilitate better coordination when scheduling reworking and the other types of rigs at the oil field to avoid concentrating too many rigs in one area.	In 2019, no more than four reworking rigs were present on the oil field at any one time not including equipment used for well maintenance and well abandonment. In 2019 SPR has ensured that reworking rigs are not overconcentrated in one area.
102	22.310.050.BB.3 (E.28.c)	Hours of Operation. With exception of emergencies, well reworking operations shall not be allowed after 7:00 p.m. or before 7:00 a.m., nor on Sundays or legal holidays.	In 2019, reworking rigs did not operate outside 7:00 am to 7:00 pm or on Sundays or legal holidays except in emergencies.
103	22.310.050.BB.4 (E.28.d)	Specifications. Reworking rigs shall meet the standards and specifications of the American Petroleum Institute.	In 2019, all reworking rigs met the standards and specifications of the American Petroleum Institute.





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104	22.310.050.BB.5 (E.28.e)	Equipment Removal. Reworking rigs shall be removed from the oil field within seven days following the completion of reworking operations unless such rig will be used on another well at the oil field within five days.	In 2019, all reworking rigs were removed from the oil field within seven days following completion of the operations unless it was scheduled for use at another well within five days.
105	22.310.050.CC.1 (E.29.a)	New Tank Specifications. All new tanks and appurtenances shall be designed, constructed, installed, and maintained in accordance with current County Fire Code, American Petroleum Institute, California Geologic Energy Management Division (CalGEM formerly DOGGR), California Division of Industrial Safety, Environmental Protection Agency Standards, applicable provisions of Title 14 of the California Code of Regulations section 177 4, and applicable CalARP Program requirements.	No new tanks were constructed in 2019.
106	22.310.050.CC.2 (E.29.b)	Setbacks. No new storage Tank, excluding a replacement tank, shall be constructed closer than 500 feet from any developed area, or closer than 200 feet from a public road. No building shall be constructed within 50 feet of any oil storage tank.	No new tanks were constructed in 2019. No new buildings were constructed within 50 feet of any oil storage tank in 2019.
107	22.310.050.CC.3 (E.29.c)	Vapor Recovery. Oil, wash, and produced water tanks shall be vapor tight and shall be equipped with a vapor recovery system.	In 2019, all oil, wash and produced water tanks were vapor tight and equipped with a vapor recovery system.
108	22.310.050.CC.4 (E.29.d)	Specifications for New Tank Piping, Valves, Fittings, and Connections. All new tank piping, valves, fittings, and connections including normal and emergency relief venting, shall be installed and maintained in accordance with current American Petroleum Institute standards to the satisfaction of SCAQMD and CalGEM (formerly DOGGR).	In 2019, all equipment covered by this provision were installed and maintained in accordance with current API standards to the satisfaction of SCAQMD and CalGEM (formerly DOGGR).
109	22.310.050.CC.5 (E.29.e)	Detection of Tank Bottom Leaks. The operator shall design, implement, and comply with a program, approved by the fire chief, for controlling and detecting tank bottom leaks on all tanks at the oil field. The operator may use a combination of methods including but not limited to diversion walls, dikes, tank foundations of concrete or gravel, and a tank bottom leak detection system in compliance with Title 14 of the California Code and Regulations section 1773, or subsequently enacted state regulations regarding tank bottom leaks.	All tanks at the Inglewood Oil Field have a program to detect tank bottom leaks as approved by the Fire Department on 2/18/10 in the Tank Leak Detection and Containment Plan.
110	22.310.050.DD (E.30)	Well and Production Reporting. The operator shall deliver annual production reports to the director and the fire chief. The reports shall provide the following information: 1. A copy of all CalGEM (formerly DOGGR) Forms 110 and 110B submitted during the previous 12 months. 2. Number and mapped location of wells drilled or redrilled, including well identification numbers. 3. Number and mapped location of water injection wells, including well identification numbers. 4. Number and mapped location of idled wells, including well identification numbers and the date each well was idled. 5. Number and mapped location of abandoned wells, including date each well was abandoned and/or re-abandoned. 6. Any additional information requested by the director or the fire chief.	The 2019 well and production reporting was submitted to the DRP and Fire Chief in March 2020.
111	22.310.050.EE (E.31)	Idle Well Testing and Maintenance. The operator shall comply with Title 14 of the California Code of Regulations section 1723.9 regarding testing and maintenance of idle wells, or subsequently enacted state regulations regarding testing and maintenance of idle wells. The operator shall carry out all additional tests, remedial operations, and mitigation measures required by CalGEM (formerly DOGGR) if any idle wells do not meet the test standards.	In 2019, all required testing and maintenance of idle wells was carried out in accordance with all applicable regulations.
112	22.310.050.FF (E.32)	Abandoned Well Testing. The operator shall conduct annual hydrocarbon vapor testing of areas within the oil field that contain abandoned wells. The testing shall be done using a soil gas vapor probe, or another method approved by the director. The results of the testing shall be submitted to the director and CalGEM (formerly DOGGR) on an annual basis. Abandoned wells that are found to be leaking hydrocarbons that could affect health and safety shall be reported to the director and CalGEM (formerly DOGGR) within 24 hours of the abandoned well test. If directed by CalGEM (formerly DOGGR), the operator shall re-abandon the well in accordance with CalGEM (formerly DOGGR) rules and regulations. If the test results for an abandoned well area are at or below the background levels for two consecutive years that area shall thereafter be tested every five years.	The 2019 abandoned well testing will be submitted to the DRP and CalGEM (formerly DOGGR) in March 2020.



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113	22.310.050.GG (E.33)	<p>Well and Well Pad Abandonment. If CalGEM (formerly DOGGR) orders the operator to plug and abandon any wells on the oil field, the operator shall deliver to the fire department, on a timely basis, all notices of intent to plug and abandon a well that the operator files with CalGEM (formerly DOGGR) and shall commence promptly and proceed diligently with the plugging and abandonment operations in accordance with CalGEM (formerly DOGGR) rules and regulations and the terms of the CalGEM (formerly DOGGR) permit to plug and abandon the well. Well abandonment may commence once all necessary permits and approvals are obtained. If the well pad associated with the abandoned well does not contain other production, injection, or idle wells, and will not be used for future drilling, then the operator shall promptly abandon the well pad consistent with the following provisions:</p> <ol style="list-style-type: none"> <li>1. Closure of Sumps. The operator shall clean out all sumps, cellars, and ditches, and level and fill all sumps and depressions pursuant to CalGEM (formerly DOGGR) requirements. If sumps are lined with concrete, bottoms and walls shall be broken up and removed. Sumps shall be closed in accordance with Regional Water Quality Control Board and California Department of Toxic Substances Control requirements.</li> <li>2. Well Pad Site Cleanup. The operator shall leave the site entirely free of oil, rotary mud, oil-soaked earth, asphalt, tar, concrete, litter, debris, and other substances to the satisfaction of CalGEM (formerly DOGGR) and in compliance with federal requirements.</li> <li>3. Contaminated Materials. All contaminated soils and materials within the well pad boundaries shall be removed and treated or disposed of in accordance with all local, county, State, and federal regulations.</li> <li>4. Well Pad Revegetation. The Well pad shall be revegetated following the requirement of the native habitat restoration plan.</li> </ol>	<p>CalGEM (formerly DOGGR) has not ordered any wells to be plugged or abandoned pursuant to this requirement. The oil field does not contain any sumps and sumps are no longer used at the oil field. Existing well pads have been cleaned up but are not scheduled for abandonment or restoration so they may be re-used to avoid the impact of developing new well pad areas.</p>
114	22.310.050.HH (E.34)	<p>County Request for Review of Well Status. The director may periodically review the status of the operator's wells and submit to CalGEM (formerly DOGGR) a list of wells the director believes should be plugged and abandoned as specified in Public Resources Code section 3206.5 or any subsequently enacted state law related to a local jurisdiction's right to request state-agency review of idle wells.</p>	<p>The County has not requested that CalGEM (formerly DOGGR) require the Operator to plug or abandon any wells pursuant to this provision.</p>
115	22.310.050.II (E.35) SA 14	<p>050.II: Reduced Throughput Triggering Review. When oil or gas throughput is less than 630 barrels per day, the director shall conduct a public hearing to determine if shut down of the oil field or other action are appropriate.</p> <p>SA 14: CSD Review Based On Reduced Production. When production drops to three percent of the estimated peak production of 21,000 barrels of oil per day, the County will review the CSD to consider whether modifications or closure of the Oil Field is necessary or appropriate or at such earlier date as the County determines appropriate.</p>	<p>The oil field has not reached the production levels that trigger this review and this provision has not been activated to date.</p>
116	22.310.050.JJ (E.36)	<p>Abandonment Procedures. Within 180 days of permanent facility shut down, the operator shall submit an abandonment plan to CalGEM (formerly DOGGR) and submit to the director for review and approval a time line for facility removal, site assessment, and remediation as necessary. The operator shall begin abandonment of the site no later than 20 days after the director's approval of the timeline, and shall provide to the director quarterly updates on the abandonment process until such time as the oil field is abandoned and remediated. The operator shall post a performance bond to insure compliance with all provisions of this subsection and the operators and landowners shall continue to pay property taxes at the rates assessed during oil field operation until all site restoration work has been fully completed, as determined by the director.</p>	<p>The facility has not shut down; hence, this provision is not applicable to date.</p>
117	22.310.060.A.1,2 (F.1.a, b)	<p>Environmental Quality Assurance Program ("EQAP"). The operator shall comply with all provisions of an environmental quality assurance program that has been approved by the director. The following provisions relate to the EQAP:</p> <ol style="list-style-type: none"> <li>1. EQAP Requirements. The EQAP shall provide a detailed description of the steps the operator shall take to assure compliance with all provisions of this section, including but not limited to, all of the monitoring programs called for by this section.</li> <li>2. Annual EQAP Reports. Within 60 days following the end of each calendar year, the operator shall submit to the director an annual EQAP report that reviews the operator's compliance with the provisions of the EQAP over the previous year and addresses such other matters as may be requested by the director. The annual EQAP report shall include the following: <ol style="list-style-type: none"> <li>a. A complete list and description of any and all instances where the provisions of the EQAP, or any of the monitoring programs referred to therein or in this section, were not fully and timely complied with, and an analysis how compliance with such provisions can be improved over the coming year.</li> <li>b. Results and analyses of all data collection efforts conducted by the operator over the previous year pursuant to the provisions of this section.</li> </ol> </li> </ol>	<p>This 2019 annual EQAP report was submitted on 03/02/2020.</p>



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118	22.310.060.A.3 (F.1.c)	EQAP Updates. The EQAP shall be updated as necessary and submitted to the director for approval along with the annual EQAP report. The EOAP updates shall be provided to the CAP and MACC for review and comment. Comments from the CAP and MACC, if timely received, shall be considered by the director before making a decision to approve the same. The director shall complete the review of EQAP updates as soon as practicable, and shall either approve the updated EOAP or provide the operator with a list of specific items that must be included in the EOAP prior to approval. The operator shall respond to any request for additional information within 30 days of receiving such request from the director, unless extended by the director.	The EQAP was approved by the County in February 2009 and was revised on August 25, 2009. No updates have been necessary to date.
119	22.310.060.B (F.2)	Environmental Compliance Coordinator. The operator shall recommend and fund the environmental compliance coordinators. The number of environmental compliance coordinators shall be determined by the county and shall take into account the level of oil operations at the oil field. The environmental compliance coordinator(s) shall be approved by, and shall report to, the director. The responsibilities of the environmental compliance coordinator(s) shall be set forth in implementation guidelines that may be developed by the county for the oil field and shall generally include: 1. On-site, day-to-day monitoring of construction or drilling and redrilling activities as determined by the director. 2. Taking steps to ensure that the operator, and all employees, contractors, and other persons working in the oil field, have knowledge of, and are in compliance with all applicable provisions of this section. 3. Evaluating the adequacy of drilling, redrilling, and construction impact mitigations, and proposing improvements to the operator or contractors and the county. 4. Reporting responsibilities to the various county agencies with oversight responsibility at the oil field, as well as other agencies such as CalGEM (formerly DOGGR), and SCAQMD.	An ECC position has been funded by the operator as required by this provision since the adoption of the CSD. The ECC site inspections are coordinated with oil field management to gain access to oil field staff, oil field contractors and for access to the oil field to check on the compliance provisions of the CSD. The ECC also participates in reviewing and commenting of all plans submitted by the Operator in compliance with the CSD.
120	22.310.060.C.1 (F.3.a)	Safety Inspection, Maintenance, and Quality Assurance Program ("SIMQAP"). The operator shall comply with all provisions of a safety inspection, maintenance, and quality assurance program that has been approved by the director and the fire chief. a. SIMQAP Requirements. The SIMQAP shall, at a minimum provide for: a. Inspection of construction techniques; b. Regular maintenance and safety inspections; c. Periodic safety audits; d. Corrosion monitoring and leak detection; and e. Inspections of all trucks carrying hazardous and/or flammable material prior to loading.	The SIMQAP was approved on 4/13/2011. The Revised SIMQAP was approved by LA County Fire Department on 6/8/2016, is implemented and ongoing.
121	22.310.060.C.2 (F.3.b)	SIMQAP Updates. The operator shall periodically review and revise the SIMQAP to incorporate changes in procedures, and new safety and maintenance technologies and procedures. The operator shall make such revisions at least every five years, or more frequently, if the operator determines changes are necessary or if requested by the director or the fire chief. The operator shall submit SIMQAP updates to the director and the fire chief for their review and approval. The director shall complete the review of SIMQAP updates as soon as practicable, and shall either approve the updated SIMQAP or provide the operator with a list of specific items that must be included in the SIMQAP prior to approval. The operator shall respond to any request for additional information within 30 days of receiving such request from the director, unless extended by the director.	The SIMQAP was approved on 4/13/2011. The Revised SIMQAP was approved by LA County Fire Department on 6/8/2016, is implemented and ongoing.
122	22.310.060.C.3 (F.3.c)	Worker Notification. The operator shall ensure that all persons working on the oil field comply with all provisions of the currently approved SIMQAP.	All persons working on the oil field in 2019 received SIMQAP training.
123	22.310.060.C.4 (F.3.d)	Inspections. The SIMQAP shall provide for involvement of county staff or the environmental compliance coordinator in all inspections required by this section.	The approved SIMQAP provides for the involvement of County staff or the ECC in all required inspections.



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124	22.310.060.D (F.4)	Annual Emergency Response Drills of the County and Culver City Fire Departments. The operator shall demonstrate the effectiveness of the emergency response plan by responding to one planned emergency response drill per year which shall be conducted in conjunction with the county and Culver City fire departments. Emergency response drills required by other agencies that involve the county and Culver City fire departments can be used to satisfy this provision. In addition, the operator shall demonstrate the effectiveness of the emergency response plan by responding to not more than two unannounced drills each year which may be called by the county fire department at the oil field. If critical operations are then underway at the oil field, the operator need not respond to a unannounced drill to the extent such a response would, as a result of such critical operations, create an undue risk of personal injury or property damage, but in such case the operator must promptly explain the nature of the critical operations, why response is not possible, and when the critical operations will be completed.	The 2019 emergency response drill was conducted on March 27, 2019. Representatives from both LA County and Culver City Fire Departments representatives attended. The County ECC and representatives from the California Department of Fish and Wildlife also attended and participated in the drill.
125	22.310.060.E (F.5)	Noise Monitoring. The public health department shall retain an independent qualified acoustical engineer to monitor ambient noise levels in the areas surrounding the oil field as determined necessary by the director or the director of public health. The monitoring shall be conducted unannounced and within a time frame specified by the director or the director of public health. Should noise from the oil operations exceed the noise thresholds specified in this section, no new drilling or redrilling permits shall be issued by the county until the operator in consultation with the director and director of public health identifies the source of the noise and the operator takes the steps necessary to assure compliance with thresholds specified in this section. The results of all such monitoring shall be promptly posted on the oil field web site and provided to the CAP.	No exceedances of the noise regulations in the County Code or of the noise limits specified subsection 050.E.1 (E.5.a) of the CSD have been reported to SPR by the DPH.
126	22.310.060.F (F.6)	Vibration Monitoring. The public health department shall retain an independent qualified acoustical engineer to monitor vibration in the areas surrounding the oil field as determined necessary by the director or the director of public health. The monitoring shall be conducted unannounced and within a time frame specified by the director or the director of public health. Should vibration from the oil operations exceed the vibration thresholds specified in this section, no new drilling or redrilling permits shall be issued by the county until the operator in consultation with the director and director of public health identifies the source of the vibration and the operator takes the steps necessary to assure compliance with thresholds specified in this section. The results of all such monitoring shall be promptly posted on the oil field web site and provided to the CAP. A telephone number by which persons may contact the operator at all times to register complaints regarding oil operations shall be posted in the main entrance sign to the facility and included in the annual newsletter required by subsections 100.B.2 and on the oil field web site required by subsection 100.B.3.	No exceedances of the vibration criteria specified in subsection 050.F (E.6) of the CSD have been reported to SPR by DPH.
127	22.310.060.G (F.7)	Complaints. All complaints related to oil operations received by the operator shall be reported on the same business day to the environmental compliance coordinator and to the director. In addition, the operator shall maintain a written log of all complaints and provide that log to the director, the MACC, and CAP on a quarterly basis. Depending upon the nature of the complaint, the operator shall report the complaint to the SCAQMD, CalGEM (formerly DOGGR), and any other appropriate agencies with oversight authority regarding the complaint at issue. If the complaint is received after normal business hours, it shall be reported to the environmental compliance coordinator and the agencies at the opening of the next business day.	All complaints received were reported to the ECC, DRP as well as other appropriate agencies with oversight of the matter in compliance with the timing of this policy. Quarterly complaint logs were submitted to the ECC and the DRP quarterly and are posted at <a href="http://www.inglewoodoilfield.com">www.inglewoodoilfield.com</a> .
128	22.310.070.A (G.1)	Costs of Implementing Monitoring and Enforcing Conditions. The operator shall be fully responsible for all reasonable costs and expenses incurred by the county or any county contractors, consultants, or employees, in implementing, monitoring, or enforcing this section, including but not limited to, costs for permitting, permit condition implementation, mitigation monitoring, reviewing and verifying information contained in reports, undertaking studies, research and inspections, administrative support, and including the fully burdened cost of time spent by county employees on such matters.	SPR has made timely payments on all CSD monitoring and enforcement costs to the County through the draw down account required by CSD Provision 070.B. All costs from the implementation of the CSD, permit processing, mitigation monitoring, compliance report research, review and verification, inspections, and administrative costs have been paid by the SPR from this account.



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129	22.310.070.B (G.2)	Draw-Down Account. The operator shall maintain a draw-down account with the department of regional planning from which actual costs will be billed and deducted for the purpose of defraying the expenses involved in the county's review and verification of the information contained in any required reports and any other activities of the county, including but not limited to, enforcement, permitting, inspection, coordination of compliance monitoring, administrative support, technical studies, and the hiring of independent consultants. The initial amount to be deposited by the operator shall be \$500,000. In the first year, if withdrawals from the account have reduced its balance to less than 50 percent of the amount of the initial deposit (\$250,000), the operator shall deposit \$50,000 in supplemental funds within 30 business days of notification. After the first year, if the balance in the draw-down account is reduced at any time to \$50,000, the operator shall deposit \$50,000 in supplemental funds on each occasion that the account is reduced to \$50,000 or less within 30 business days of notification. There is no limit to the number of supplemental deposits that may be required. At the discretion of the operator, the amount of an initial or supplemental deposit may exceed the minimum amounts specified in this subsection. The director may, from time to time, increase the minimum \$50,000 figure to account for inflation or the county's experience in obtaining funds from the account.	The draw-down account has been maintained at or above the \$50,000 balance as required by this requirement. Deposits to the account in 2019 occurred on 3/7/2019 and on 9/12/2019.
130	22.310.070.C (G.3)	Indemnification. The operator shall enter into an agreement with the county to indemnify and hold harmless the county, its elected and appointed officials, agents, officers, and employees from any claim, action, or proceeding for damages arising from its oil operations, including water, air or soil contamination, health impacts, or loss of property value during the oil operations, well abandonment, and post-abandonment activities with terms approved by, and in a form acceptable to, the CEO.	The required agreement was documented in a letter signed by the operator and the County dated August 16, 2017, the agreement is on file with the County.
131	22.310.070.H (G.4)	Insurance Requirements. Within 90 days following the effective date of the ordinance creating this section or such later time as may be approved by the director for good cause shown, and without limiting the operator's indemnification of the county as required in the preceding subsection, the operator shall provide evidence of insurance coverage that meets county requirements as required and approved by the CEO including identifying the county and its elected and appointed officers and employees as additional insureds. Such coverage shall be maintained so long as oil operations are conducted within the district and until such time as all abandonment requirements are met and certified by the appropriate local, state, and federal agencies. Such insurance coverage shall include but is not necessarily limited to the following: general liability, auto liability, professional liability, and environmental impairment liability coverage insuring clean-up costs and endorsing for 'Sudden and Accidental contamination or pollution. Such coverage shall be in an amount sufficient to meet all applicable state and federal requirements, with no special limitations. At the operator's request and only with county approval by the CEO, the operator may self-insure all or any part of the above coverage obligations in lieu of purchasing commercial coverage. These insurance requirements shall be in addition to all other indemnification, insurance and performance security required by federal, state, and local regulations and permits.	PXP, the operator at the time of CSD adoption, provided the County with an insurance policy meeting the liability and environmental impairment liability requirements of this provision on January 18, 2010. SPR updated this insurance to reflect the change in operator on January 18, 2018.
132	22.310.070.E.1 (G.5.a)	Performance Bond. Prior to issuance of the first drilling or redrilling permit pursuant to this section, the operator shall provide to the department of regional planning a faithful performance bond or financial instrument in the sum to be determined by the CEO, payable to the county and executed by a corporate surety acceptable to the county and licensed to transact business as a surety in the state of California. Such bond shall be conditioned upon the faithful performance by the operator of duties related to well abandonment, site restoration, and environmental cleanup and shall be in a format and include terms approved by the CEO.	SPR obtained Performance Bond No. B010359 for the benefit of Baldwin Hills Community Standards District of the County of Los Angeles, as Oblige with the Executed Date of December 14, 2016 and Effective Date of Change of November 3, 2017.
133	22.310.070.E.2 (G.5.b)	Change of Operator. The performance bond shall continue in force for one year following any sale, transfer, assignment, or other change of operator of the oil field, or of the current operator's termination of activities at the oil field. The county may release said bond prior to the end of the one-year period upon satisfaction by the operator of all its obligations. Notwithstanding the foregoing, the performance bond shall not be terminated or released upon the sale, transfer, assignment, or other change of operator until the new operator has delivered a replacement bond complying with the provisions of this subsection G.	It is SPR's understanding that this bond is based upon anticipated end of life remaining liabilities that may be present. This bond exceeds the liability of remediation cost analyses and should be adequate to provide the necessary coverage.
134	22.310.070.E.3 (G.5.c)	Funding Options. At its sole option, the county may accept certificates of deposit, cash deposits, or U.S. government securities in lieu of commercial bonds to meet the above bonding requirements on terms approved by the CEO.	This provision is not applicable since SPR provided a performance bond in accordance with G.5.a.
135	22.310.070.F (G.6)	Other Obligations. The insurance, indemnification, and performance security requirements in subsections 070.C, 070.D, and 070.E shall be in addition to all other indemnification, insurance, and performance security required by federal, state and local regulations, and permits.	The condition is administrative in its intent and is fully implemented.



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136	22.310.070.G (G.7)	<p>Periodic Review. The county shall conduct a comprehensive review of the provisions of this section at least every five years to determine if the provisions of this section are adequately protecting the health, safety, and general welfare. Such reviews shall, among other things, consider whether additional provisions should be added, appended, or removed. One of the main goals of the periodic review shall be to evaluate if proven technological advances that would further reduce impacts of oil operations on neighboring land uses should be incorporated into the provisions of this section.</p> <p>1. Review Requirements. Each review shall include a report by a hearing officer designated by the director, which shall be prepared after public notice and an opportunity for public comment. The report shall include a comprehensive analysis of the effectiveness of this section, and shall review and consider enforcement activity, operational records, and any other issues relating to oil operations. The report, at the option of the county, may include a survey of residents near the oil field regarding noise, odors, vibrations, and other issues requested by the director of public health. A draft of the report shall be provided to the CAP and the operator for review and comment. All comments on the draft report from the CAP and the operator shall be submitted to the hearing officer in writing, and will be considered, if timely received, before the report is finalized. The final report by the hearing officer shall include a recommendation as to whether the director should prepare proposed amendment to this section for submission to the board of supervisors.</p> <p>2. Early Reviews. At the discretion of the director, reviews of this section may be conducted more frequently than every five years. Without limiting such discretion, the director shall consider whether an early review should be undertaken if more than three material violations occur within any 12-month period.</p> <p>3. Initial Review. The initial review shall occur no sooner than three years and no later than five years after the effective date of the ordinance establishing this section unless the director determines that such initial annual review shall occur at an earlier time pursuant to subsection b, above.</p>	<p>The County released a five year review report in February 2014. The draft report was circulated for review and comment to both the CAP, members of the public, other agencies and the operator. Comments on the draft report were considered in the preparation of the administrative final draft released on 06/25/15. The administrative final draft was discussed at the July 2015 CAP meeting, and on 09/24/15, the final draft was issued. The report was prepared consistent with the five year time frame requirement stipulated in CSD Provision G.7.c. On 10/28/15, Los Angeles County DRP issued a letter to FM O&amp;G verifying the conclusion of the Periodic Reivew Final Report dated September 2015 that the provisions of the CSD have been effective and that no modification to the current language of the CSD is recommended.</p>
137	22.310.070.H (G.8)	<p>Multiple Agency Coordination Committee ("MACC"). A MACC shall be established to coordinate activities and communications between the various agencies with regulatory authority over the oil operations within the district. While each agency will continue to make its own decisions with regard to their respective areas of authority, the MACC will allow for collection and analysis of data and for discussion of both strategic evaluations and enforcement actions taken by the various agencies at the oil field.</p> <p>1. MACC Members. The director shall establish a MACC that includes representatives from the following agencies: the county department of regional planning, the county fire department, the county department of public works, and the county department of public health. The SCAQMD, the Regional Water Quality Control Board, CalGEM (formerly DOGGR), and Culver City fire department shall be invited to appoint a representative from their agency as a member of the MACC.</p> <p>2. MACC Chair. The director or his designee shall chair the MACC meetings and shall coordinate all MACC activities including scheduling and keeping minutes of MACC meetings.</p> <p>3. MACC Meetings. The MACC shall determine its meeting schedule.</p> <p>4. Documents Provided to the MACC. Copies of all monitoring and compliance reports, plans, and other documents that are requirements of this section shall be submitted to the MACC.</p>	<p>A MACC was established in 2009, and the MACC conducts periodic meetings. All monitoring and compliance reports are provided to the MACC.</p>
138	22.310.070.I (G.9)	<p>Related County Code Provisions. The county code contains a number of provisions related to oil wells and oil field operations. Where the regulations of this section differ from any other provisions in the county code, these regulations shall supersede unless the contrary provisions are mandated by state law.</p>	<p>The provision is a standard County requirement to clarify jurisdiction on similar code and regulations.</p>





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139	22.310.080.A (H.1) SA 4	<p>080.A: Director's Review Required. The operator shall apply for and receive approval of a director's review pursuant to the provisions of Part 12 of Chapter 22.56 prior to any new drilling and redrilling. New drilling and redrilling approved through a director's review procedure shall be limited to no more than 53 wells per year, with the maximum number of newly drilled wells of that total, limited to 45 per year, except that during the first year following the effective date of the ordinance establishing this section, new drilling and redrilling shall be limited to no more than 24 wells. Approval through director's review for drilling new wells shall be limited to 600 wells over 20 years, beginning on the effective date of this ordinance. Drilling and redrilling shall be planned to avoid over concentration of such activities in one area in any one year, if near developed areas. The director's review procedures shall also apply to emergency actions determined by the director as necessary to prevent an imminent hazard, or to other immediate measures required for the purposes of protecting health and safety. No new permits for drilling or redrilling shall be approved by the director unless the subject wells have been approved as part of an annual drilling plan as described in subsection 050.Z.3. Approval shall not be granted until copies of all related permits have been submitted to the director; other permits include, but are not limited to, the permits required by CalGEM (formerly DOGGR), the county fire department; the county department of public works, the county sanitation district, RWQCB, SCAQMD, and other pertinent agencies identified by the director.</p>	No new drilling or redrilling occurred in 2019.																											
140	22.310.080.A (H.1) SA 4	<p>SA 4: Number of wells. Notwithstanding the aggregate and annual well-drilling limits in the CSD, the operator shall comply with the following limits:</p> <p>a. Notwithstanding Section 22.44.142.H of the CSD, no more than 500 new wells (inclusive of Bonus Wells and wells drilled since approval of CSD) shall be drilled pursuant to the CSD (hereinafter "Director's Review") through October 1, 2028, or during the remaining life of the CSD, whichever is later.</p> <p>b. Until such time as the operator has drilled or redrilled 50 wells since the adoption of the CSD, or 24 months from the date of this Agreement, whichever is sooner ("Time Period One"), no more than 30 wells may be drilled or re-drilled in any calendar year pursuant to a Director's Review as set forth in the CSD (hereinafter Director's Review). At the end of Time Period One, and if the County determines, pursuant to its review of the CSD by the Director of Regional Planning, that the CSD has been effective in protecting the health, safety, and general welfare of the public, thereafter (the "Full Operational Period") no more than 35 wells may be drilled or re-drilled in the calendar year pursuant to Director's Review.</p> <p>c. In Time Period One, for each well abandoned within 800 feet of any Developed Area (the "800-foot zone") by PXP since adoption of the CSD and in full compliance with the California Geologic Energy Management Division ("CalGEM" formerly "DOGGR") standards for abandonment at the time of abandonment, the operator may drill two additional new wells outside of the 800-foot zone (hereinafter "Bonus Wells"), up to a maximum of 45 drilled and redrilled wells (30 wells plus 15 Bonus Wells) in any calendar year within Time Period One pursuant to Director's Review and subject to review and approval in the Annual Drilling Plan. Subject to the annual and aggregate limits on number of wells, Bonus Wells earned by abandonment may be drilled at any time during the life of the CSD.</p> <p>d. In the Full Operational Period, for each well abandoned within the 800-foot zone, the operator may drill two additional new wells outside the 800-foot zone up to a maximum of 53 drilled and re-drilled wells (35 wells plus 18 Bonus Wells) in that year pursuant to Director's Review and subject to review and approval in the Annual Drilling Plan. Subject to the aggregate and annual limits on number of wells, Bonus Wells earned by abandonment may be drilled at any time during the life of the CSD.</p> <p>e. The Developed Area as used in the CSD with respect to the 400-foot buffer zone (Section 22.44.142.E.) shall remain unchanged (static or fixed) from what it was determined to be on the effective date of the CSD.</p>	<p>Since inception of the CSD and following the installation of 50 new wells, the Settlement Agreement allows SPR to apply to the County for approval to install up to 35 new wells per year. SPR's predecessor applied for this well increase on 10/10/2011 and was granted approval by the County on 12/12/2011.</p> <p>Since inception of the CSD through 6/30/2014, 127 wells have been drilled and 41 wells have been abandoned; of which 20 were within 800 feet of Developed Areas.</p> <p><b>Number of Wells Drilled Since Inception of the CSD</b></p> <table border="1"> <thead> <tr> <th>YEAR</th> <th>NUMBER OF WELLS</th> <th>BONUS WELLS USED</th> </tr> </thead> <tbody> <tr> <td>2009</td> <td>0</td> <td>0</td> </tr> <tr> <td>2010</td> <td>19</td> <td>0</td> </tr> <tr> <td>2011</td> <td>40</td> <td>5</td> </tr> <tr> <td>2012</td> <td>20</td> <td>0</td> </tr> <tr> <td>2013</td> <td>30</td> <td>0</td> </tr> <tr> <td>2014</td> <td>18</td> <td>0</td> </tr> <tr> <td>2015-19</td> <td>0</td> <td>0</td> </tr> <tr> <td><b>Total</b></td> <td><b>127</b></td> <td><b>5</b></td> </tr> </tbody> </table>	YEAR	NUMBER OF WELLS	BONUS WELLS USED	2009	0	0	2010	19	0	2011	40	5	2012	20	0	2013	30	0	2014	18	0	2015-19	0	0	<b>Total</b>	<b>127</b>	<b>5</b>
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141	22.310.080.B-C (H.2 - 3)	<p>080.B: Conditional Use Permit Required. Provided a conditional use permit has first been obtained as provided in Part 1 of Chapter 22.56, and while such permit is in full force and effect in conformity with the conditions of such permit, the following uses may be established:</p> <ol style="list-style-type: none"> <li>1. Drilling or redrilling that exceeds the maximum number allowed pursuant to a director's Review;</li> <li>2. Steam drive plant; and</li> <li>3. New tanks with a capacity of greater than 5,000 barrels.</li> </ol> <p>080.C: Conditional Use Permit Requirements. For those uses requiring a conditional use permit, in addition to the requirements of Part 1 of Chapter 22.56, the applicant shall substantiate to the satisfaction of the hearing officer that:</p> <ol style="list-style-type: none"> <li>1. The requested use is in compliance with the provisions of this section; and</li> <li>2. All reasonable measures were taken to reduce and minimize potential impacts from the proposed operation.</li> </ol>	No conditional use permits have been applied for/obtained.																											



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142	22.310.080.D (H.4)	Application Where Violation Exists. No application required pursuant to this section shall be accepted for processing or approved where any existing use in the district is being maintained or operated by the operator or its agents in violation of any material provision of this title.	No violations were issued in 2019.
143	22.310.090.A (I.1)	<p>Civil Penalties and Performance Security. The operator shall be subject to a penalty for violation of any requirement of this section as determined by, and at the discretion of, the director in an amount not less than \$1,000 or more than \$1 0,000 per day per violation, but in no event, in an amount beyond that authorized by state law. For this purpose, the operator shall deposit the sum of \$100,000 in an interest-bearing trust fund with the department of regional planning within 30 days following the effective date of this section, to establish a draw-down account. A written notice of violation and the associated penalty will be sent to the operator in the event of a violation. If the noted violation is not corrected to the satisfaction of the director within the time period set forth in the notice of violation, the penalty amount cited in the notice of violation will be deducted from the account. If the violation is corrected within the time period set forth in the notice of violation, but recurs any time within a six-month period, the penalty will be deducted from the account upon each recurrence and the operator will be notified of such deduction. Once the deposit has been depleted by 50 percent of the initial amount (\$50,000), the operator shall deposit additional funds sufficient to bring the balance up to the amount of the initial deposit (\$1 00,000) within 10 business days of notification. There is no limit to the number of supplemental deposits that may be required while the operator conducts oil operations within the district. If the operator is dissatisfied with the action of the director, the operator may file an appeal with the hearing officer within 15 days after the date which notice is mailed. Upon receiving a notice of appeal, the hearing officer shall take one of the following actions.</p> <ol style="list-style-type: none"> <li>1. Affirm the action of the director;</li> <li>2. Refer the matter back to the director for further review with or without instructions; or</li> <li>3. Set the matter for public hearing and after hearing, affirm, modify, or reverse the action of the director.</li> </ol> <p>The decision of the hearing officer shall be final.</p>	On 12/23/08, \$100,000 was deposited with the County in the interest-bearing trust fund required by this provision. SPR was not subject to any fees described in this provision; hence, the balance of this account has not changed with the exception of interest accumulation.
144	22.310.090.B (I.2)	Access to Records and Facilities. As to any condition which requires for its effective enforcement the inspection of records or facilities by the county or its agents, the operator shall make such records available or provide access to such facilities upon reasonable notice from the county. The county agrees to keep such information confidential where required or permitted by law and requested by the operator in writing.	SPR has made records and facilities available for inspection by the County and its agents.
145	22.310.090.C (I.3)	Right of Entry. Any officer or employee of the county of Los Angeles, or his or her duly appointed representative, whose duties require the inspection of the oil field premises shall have the right and privilege at all reasonable times, to enter upon any premises upon or from which any oil operations are being conducted for which any permit is required under this section, for the purpose of making any of the inspections pursuant to this section, or in any other ordinance of the county, or for any other lawful purpose, but for safety reasons, shall be accompanied by the operator or a designee of the operator and shall wear all appropriate personal protection equipment in accordance with the operator's established health and safety policies.	SPR has made the oil field open to authorized inspection.





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#	CSD Section/ Plan	CSD Language	Compliance Description
146	22.310.100.A (J.1)	<p>Community Advisory Panel ("CAP"). A community advisory panel shall be established by the director to foster communication about ongoing operations at the oil field and to allow the community representatives to provide input to the county and the operator.</p> <p>1. CAP Members. The CAP may include representatives of the county, the city of Los Angeles, the city of Culver City, West Los Angeles College, the operator, the landowners, and each of the major neighborhoods surrounding the oil field (including Ladera Heights, Windsor Hills, Oak Park, View Park, Culver Crest, Blair Hills, and Raintree). The operator and each of the governmental entities previously referred to may each designate a representative to the CAP. Each landowner and neighborhood organization of the surrounding communities may submit a nomination to the director for appointment to the CAP. Where there is no neighborhood organization, a community resident may make a request to the director to be appointed to the CAP. School districts with schools in the vicinity of the oil field and the lessors may make a request to the director to have a representative appointed to the CAP.</p> <p>2. CAP Meetings. The CAP shall determine its meeting schedule.</p> <p>3. Documents Provided to the CAP. A notice of availability of all monitoring and compliance reports and results, all plans, audits and studies, and any other available documents that are required by this section shall be submitted to the CAP promptly after they are prepared or otherwise available. Copies of these reports, documents, and other items shall be provided to CAP members upon request except to the extent information therein may not be legally disclosed. Prior to each CAP meeting, the county shall provide to the CAP a list of all violations of the provisions of this section that have occurred since the last CAP meeting.</p>	Documentation made available to the CAP is posted on the Inglewood Oil Field website required/described in 100.B.3 (J.2.c).
147	22.310.100.B.1 (J.2.a) 22.310.070.G (G.7) (2015)	<p>100.B.1: Community Meetings. The operator shall hold community meetings on an annual basis to provide updates on oil operations.</p> <p>070.G (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section 070.G of CSD recommended that "agendas for future Community Meetings be specific to oil field operations and issues and that measures be implemented to ensure questions from the public are addressed appropriately.</p>	The 2019 annual meeting was held on 10/12/2019, and in accordance with the 070.G (2015) recommendation, the agenda was specific to oil field operations and SPR ensured that questions from the public were addressed appropriately.
148	22.310.100.B.2 (J.2.b)	<p>Newsletter. The Operator shall publish an informational newsletter annually, which shall contain updated information on oil operations including drilling, redrilling, maintenance, repair, and reworking activities and all recently granted conditional use permits or applications filed for conditional use permits for the oil field. The newsletter shall be mailed by the operator to all owners of property located within 1,000 feet of the outer boundary line; all owners of property within 1,000 feet of the perimeter of the district as shown in the records of the county assessor's office; to any person or entity who has filed a written request therefore with the director; and to neighboring cities. The operator shall also make these newsletters available on the oil field web site. The oil field web site address shall be publicized in each newsletter.</p>	The newsletter was mailed out and posted on <a href="http://www.inglewoodoilfield.com">www.inglewoodoilfield.com</a> on 9/17/2019.
149	22.310.100.B.3 (J.2.c)	<p>Oil Field Web Site. The operator shall maintain and update on a regular basis an oil field web site that shall include information on oil operations at the oil field, including drilling and production activities. All monitoring and compliance reports and results, plans, audits and studies, and any other available documents that are required by this section (except to the extent they contain information that may not legally be disclosed) shall be promptly posted on the Oil Field Web Site in pdf format.</p>	SPR maintains the <a href="http://www.inglewoodoilfield.com">www.inglewoodoilfield.com</a> website, which includes information on the history and future of the oil field, oil field operations, operational plans, compliance plans, community and environmental sections, and information on the CSD. The web site contains over 300 documents related to operational and compliance information with the documentation posted in pdf format as required by this policy. The web site also provides contact information and includes an interactive email system to allow for direct input to SPR and for registering for email updates on oil field activities.



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150	22.310.100.C (J.3)	Ombudsperson. The operator shall designate employees or authorized agents to serve as ombudspersons to respond to questions and concerns concerning the oil operations. Each ombudsperson shall be familiar with all the provisions of this section and all conditions of approval related to permits and approvals issued by the county or the State of California. It shall be the further responsibility of the ombudsperson to facilitate, to the extent feasible, the prompt resolution of any issues that may arise relating to the above-stated matters or the impacts of the oil operations. The name, title, email address, and telephone number of the ombudsperson shall be posted on the oil field web site, prominently displayed in the newsletter, distributed twice per year to the CAP and MACC, and provided to any other persons requesting such information. An ombudsperson shall be available at all times, and shall respond within one hour after an initial call. An ombudsperson shall also meet at reasonable times with interested parties in an attempt to resolve issues related to oil operations. An ombudsperson shall have authority to initiate a response on behalf of the operator in all foreseeable matters. The operator shall be required to maintain a written log of all calls to the ombudspersons registering complaints or concerns regarding oil operations or other matters. The log shall include the complainant's name, date, time, phone number, nature of complaint, and the response or resolution offered. A copy of the log shall be provided to the director, the MACC, and the CAP on a quarterly basis.	The ombudsperson system has been in place since the adoption of the CSD and serves as primary contact between SPR and the community. The ombudsperson contact information is included in the annual newsletters and in the agendas for CAP meetings. In addition to the ombudsperson, the oil field maintains four staff members on an on-call basis to coordinate and respond to calls from the public or regulatory agencies regarding oil field operations. SPR maintains a complaint log summarizing all calls made to the ombudsperson as required by this policy.
151	Section 22.310.110 (K)	Modification of Development Standards.	No modifications to development standards has been applied for.
152	Section 22.310.120 (L)	Implementation Provisions. This subsection identifies the various implementation plans and other requirements for initial compliance with this CSD and the time frames therefor. Except as identified below, the provisions of this section shall be complied with on the effective date of the ordinance establishing this CSD. As used in this subsection, "effective date" shall mean 30 days after the board of supervisors adopts the ordinance establishing this CSD. As soon as possible after the effective date, the department of regional planning shall develop an overall implementation plan specifying the required contents or measures for each of the plans set forth below, including the inclusion of those appropriate mitigation measures indicated as necessary by the Final Environmental Impact Report for the Baldwin Hills Community Standards District to reduce environmental impacts to less than significant levels in cases where impacts can be so reduced.	This subsection of the CSD lists the various implementation plans and other stipulations required for initial compliance along with a submittal schedule for the subject compliance. The schedule requirements for the plan and compliance submittals required under this provision range from 30 days to two years following the effective date of the CSD (October 28, 2008). All plans and initial requirements of this CSD subsection were completed; therefore, this requirement is no longer applicable.
153	SA 5	Health Assessment and Environmental Justice Study. The County shall complete a Community Health Assessment of the communities surrounding the Oil Field which shall include an Environmental Justice component by June 2012 and ensure additional assessments are completed every five to seven years throughout the life of the CSD. In future Community Health Assessments, the County Department of Public Health ("Public Health") shall review other agencies' reports regarding air quality, water quality and seismic data, where feasible, in its assessment. Public Health will analyze the information by socio-economic and demographic data to accommodate and reflect an Environmental Justice component. The Community Health Assessment shall include, but not be limited to, an analysis of cancer rates, mortality rates, birth outcomes and a survey of other pertinent health indicators. The County will consult with the CAP and the Health Working Group regarding the Community Health Assessment and consider reasonable comments by the CAP and the Health Working Group. Public Health will comply with all applicable state and federal requirements including Title VI of the Civil Rights Act of 1964 and corresponding regulations, and California Government Code Section 11135 and corresponding regulations.	This is a County action that was completed in May 2012. The DPH has initiated work on the second study to be completed by June 2019, which is the deadline imposed by the Settlement Agreement. The estimated completion date for the second study is July 2021 per a letter dated 5/28/2019.
154	SA 7	Electrical Distribution Study. The County will propose to Southern California Edison ("SCE") and the Los Angeles Department of Water and Power ("DWP") that a study be conducted in cooperation with SCE, DWP, the County and the operator regarding opportunities to streamline and consolidate electrical lines distributed throughout the Oil Field and that SCE and DWP each fund one-fourth of the cost of such study. The operator will fund one fourth of the cost of any such study. The County will fund one-fourth of the cost of any such study.	This is a County action, and it was reported that both SCE and DWP declined to participate with respect to funding the study.



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155	SA 8	Air Quality Monitoring. Supplemental to the air monitoring required by the CSD, the County will develop and implement an air quality monitoring plan that takes into consideration review and comments from Petitioners, interested stakeholders and the public. Such air monitoring shall be designed to assess the risk of both acute and chronic exposure to air contaminants from Oil Field operations, and endeavor to determine and distinguish the source of emissions, to the extent feasible, using available and affordable monitoring technology. Such air monitoring may be performed by SCAQMD, or an independent qualified consultant selected by County, and shall be commenced within 12 months of the date of this Agreement. The protocol for the air monitoring plan shall be peer reviewed prior to commencement. The plan shall be completed, and a peer reviewed report issued, within 12 to 24 months after commencement. The County commits to spending up to \$250,000 of its own funds toward implementing the plan and shall use reasonable efforts to seek additional funding sources, if necessary, to implement the plan. The operator shall reasonably cooperate with SCAQMD, the County and/or the independent consultant regarding any and all air monitoring related to the Oil Field.	This is a County action that was completed in February 2015.
156	SA 9	Back-Up Flare. The CSD (County Code section 22.44.142.L.5.b) allows the operator to maintain its existing gas plant flare as back-up equipment at the facility's gas plant after a new flare is permitted and installed. The operator and the County agree that this provision of the CSD allows only one gas plant flare to be operated at one time at the Oil Field. The operator shall comply with said limitation of only one gas plant flare operating at one time at the Oil Field. The operator shall install and have operational the new flare within 180 days of receiving the SCAQMD permit or at such later date as approved by the Director of Regional Planning for good cause shown.	Installation of the new gas plant back-up flare was completed in 2012. The old gas plant flare remains and is maintained as a back up equipment as allowed for by CSD Provision L.5.b and the Settlement Agreement. SPR has complied with the requirement that only one flare be in operation at one time at the oil field.
157	SA 10	Well Plugs. CalGEM (formerly DOGGR) requires oil field operators to utilize a minimum 25-foot cement surface plug at the top of a well when abandoning any such well pursuant to Title 14 of the California Code of Regulations section 1723.5. To augment this requirement, for all wells abandoned at the Oil Field from the date of this Agreement, the operator shall utilize a total of 150-foot cement surface plug.	SPR complies with the 150 foot cement plug requirement for abandoned wells.
158	SA 13	Fracking Study. The operator shall pay for an independent consultant to conduct a study of the feasibility and potential impacts (including impacts to groundwater and subsidence) of the types of fracturing operations the operator may conduct in the Oil Field. The study will also consider the operator's historic and current use of gravel packing. Such study will be completed within twelve (12) months of the date of this Agreement. Such study and all the back-up information for such study shall be provided to a qualified peer reviewer selected by the County and the operator, who shall review the study, back-up materials, and conclusions for completeness and accuracy. The operator must provide the independent expert with all materials requested and reasonably necessary for an accurate and verifiable study. The peer reviewer will be provided with access to all the data and materials provided to the independent expert. The peer reviewer shall agree to keep all proprietary information confidential. If the peer reviewer determines that the study is materially inadequate, incomplete or inaccurate, it shall so advise the operator's consultant who will complete the study as reasonably recommended by the peer reviewer and provide the revised study to the peer reviewer within 90 days. Upon acceptance by the peer reviewer, the study and all supporting material, including comments by the peer reviewer, shall be forwarded to the County, CalGEM (formerly DOGGR), the Regional Water Quality Control Board ("RWQCB"), CAP and Petitioners and be available to the public, with any proprietary information redacted.	The Hydraulic Fracturing Study – Inglewood Oil Field was completed in July 2012 with the final report dated October 10, 2012 consistent with the requirements of the Settlement Agreement. The report is available to the public on the Inglewood Oil Field web site.
159	SA 15	CSD Provisions. The CSD and all of its standards and requirements remain in full force and effect except to the extent that the operator has agreed to be limited by stricter or more rigorous controls or standards as reflected in this Agreement. Nothing herein shall limit or abrogate the County's discretion in amending the CSD, or other action pursuant to the County's legislative or police powers, to impose more restrictive requirements. This Agreement neither establishes nor abrogates any vested rights to drill new wells in the Oil Field. The County will provide written guidance on the additional limits and controls regarding operation of the Oil Field which are required by this Agreement to County staff and departments responsible for implementing the CSD and enforcing the CSD, and any other personnel the County deems necessary. The County shall recirculate this written guidance on an annual basis.	The requirements of the CSD and the Settlement Agreement remain in full effect. The County released the written guidance required by this provision via the Periodic Review report as described in CSD provision 070.G (G.7) and a Settlement Agreement & Mutual Release Requirements 2019 Annual Compliance Report dated 10/29/2019.

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1	22.310.050.A.1 (E.1.a) 22.310.070.G (G.7) (2015)	050.A: Community Alert Notification System ("CAN"). The operator shall maintain and test on an annual basis a CAN for automatic notification of area residences and businesses in the event of an emergency arising at the oil field that could require residents or inhabitants to take shelter, evacuate, or take other protective actions. 070.G (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section 070.G of CSD recommended that "the 050.A annual Community Alert Notification (CAN) tests include interested residents."	The CAN is maintained and was tested on 12/15/2020. Interested residents were included in this test pursuant to the 070.G/Final 2015 Periodic Review Final Report recommendation on this provision.
2	22.310.050.A.2 (E.1.b)	Spill Containment Response Training. The operator shall conduct annual spill containment response training and shall at all times have available, on-site, sufficient and properly maintained equipment and/or facilities so that a spill of the entire contents from the largest oil tank on the oil field can be responded to and contained in a timely manner to reduce the likelihood that the spill reaches a catch basin.	The annual spill containment response training occurred on 09/29/2020.
3	22.310.050.A.3 (E.1.c)	Emergency Response Plan ("ERP"). The operator shall at all times maintain and fully implement and comply with all provisions of an emergency response plan and shall further ensure that the then current ERP satisfies all rules and regulations of the United States Environmental Protection Agency and California Code of Regulations relating to emergency action plans and spill prevention control and countermeasure plans, as well as the rules, regulations, and requirements of the California Office of Spill Prevention and Response. The ERP shall also satisfy the rules and regulations of the United States Department of Transportation relating to onshore pipeline spills.	SPR maintains, fully implements and complies with an ERP that is in compliance with all applicable rules and regulations of agencies with oversight of the ERP.
4	22.310.050.B.1 (E.2.a)	Emission Offsets. The operator shall obtain emission offsets or RECLAIM credits as defined and required by SCAQMD Regulations for all new or modified emission sources that require a new or modified SCAQMD permit.	SPR purchased 890 Reclaim credits in 2020.
5	22.310.050.B.3 (E.2.c)	Odor Minimization. At all times the operator shall comply with the provisions of an odor minimization plan that has been approved by the Director. The odor minimization plan shall include any measures requested by the Director. The plan shall provide detailed information about the facility and shall address all issues relating to odors from oil operations. Matters addressed within the plan shall include setbacks, signs with contact information, logs of odor complaints, method of controlling odors such as flaring and odor suppressants, and the protocol for handling odor complaints. The odor minimization plan shall be reviewed by the operator on an annual basis to determine if modifications to the plan are required. Any modifications to the odor minimization plan shall be submitted to the Director for review and approval.	The Odor Minimization Plan was reviewed by SPR on 12/7/2020 and it was determined that no modifications are required.
6	22.310.050.B.4 (E.2.d)	Air Monitoring Plan. At all times the operator shall comply with the provisions of an air monitoring plan that has been approved by the Director. The air monitoring plan shall include any measure requested by the Director. During drilling, redrilling, and reworking operations, the operator shall monitor for hydrogen sulfide and total hydrocarbon vapors as specified in the approved plan. Total hydrocarbon vapors shall be monitored at the gas plant as specified in the approved plan. Such monitors shall provide automatic alarms that are triggered by the detection of hydrogen sulfide or total hydrocarbon vapors. For drilling, redrilling, or reworking monitors, the alarms shall be audible and/or visible to the person operating the drilling, redrilling, or reworking equipment. For the gas plant monitors, the alarms shall be audible or visible to the gas plant operator. Actions to be taken shall be as follows when specified alarm levels are reached:	SPR complied with the provisions of the approved Air Monitoring Plan. Compliance was monitored by County Environmental Compliance Coordinator (ECC) site visits.

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#	CSD Section/ Plan	CSD Language	Compliance Description
7	22.310.050.B.4.a - d (E.2.d.i - iv)	<p>a. At a hydrogen sulfide concentration of equal to or greater than five parts per million but less than 10 parts per million, the operator shall immediately investigate the source of the hydrogen sulfide emissions and take prompt corrective action to eliminate the source. The corrective action taken shall be documented in the drilling, redrilling, or reworking log. If the concentration is not reduced to less than five parts per million within four hours of the first occurrence of such concentration, the operator shall shut down the drilling, redrilling, or reworking operations in a safe and controlled manner, until the source of the hydrogen sulfide emissions has been eliminated, unless shutdown creates a health and safety hazard.</p> <p>b. At a hydrogen sulfide concentration equal to or greater than 10 parts per million, the operator shall promptly shut down the drilling, redrilling, or reworking operations in a safe and controlled manner until the source of the hydrogen sulfide emissions has been eliminated, unless shutdown creates a health and safety hazard. The corrective action taken shall be documented in the drilling, redrilling, or reworking log. When an alarm is received, the operator shall promptly notify the County Fire Department- Health Hazardous Materials Division, the Culver City Fire Department, the Office of Emergency Services, and the SCAQMD.</p> <p>c. At a total hydrocarbon concentration equal to or greater than 500 parts per million but less than 1,000 parts per million, the operator shall immediately investigate the source of the hydrocarbon emissions and take prompt corrective action to eliminate the source. The corrective action taken shall be documented in the drilling log for drilling, redrilling, or reworking and in the gas plant log for the gas plant. If the concentration is not reduced to less than 500 parts per million within four hours of the first occurrence of such concentration, the operator shall shut down the drilling, redrilling, reworking, or gas plant operations in a safe and controlled manner, until the source of the hydrocarbon emissions has been eliminated, unless shutdown creates a health and safety hazard.</p> <p>d. At a total hydrocarbon concentration equal to or greater than 1,000 parts per million, the operator shall promptly shut down the drilling, redrilling, or reworking or gas plant operations in a safe and controlled manner, until the source of the hydrocarbon emissions has been eliminated, unless shutdown creates a health and safety hazard. The corrective action taken shall be documented in the drilling log for drilling, redrilling, or reworking and in the gas plant log for the gas plant. When an alarm is received, the operator shall promptly notify the County Fire Department-Health Hazardous Materials Division, the Culver City Fire Department, and the SCAQMD.</p>	<p>In 2020, no notifications to The County or City of Culver City Fire Departments or AQMD were required. Quarterly reports were submitted showing no exceedances for hydrogen sulfide and/or total hydrocarbons.</p>
8	22.310.050.B.4.e (E.2.d.v)	<p>All the monitoring equipment shall keep a record of the levels of total hydrocarbons and hydrogen sulfide detected at each of the monitors, which shall be retained for at least five years. The operator shall, on a quarterly basis, provide a summary of all monitoring events where the hydrogen sulfide concentration was at five parts per million or higher and the total hydrocarbon concentration was at 500 parts per million or higher to the Fire Chief. At the request of the Fire Chief, the operator shall make available the retained records from the monitoring equipment.</p>	<p>In 2020, SPR provided the Fire Chief with quarterly reports, all of which reported zero (0) events during the respective quarter, on 4/7/20, 7/13/20, 10/14/20, and 1/6/21.</p>

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9	22.310.050.B.5 (E.2.e)	Portable Flare for Drilling. The operator shall have a gas buster and a portable flare, approved by the SCAQMD, at the oil field and available for immediate use to remove any gas encountered during drilling operations from drilling muds prior to the muds being sent to the shaker table, and to direct such gas to the portable flare for combustion. The portable flare shall record the volume of gas that is burned in the flare. The volume of gas burned in the flare shall be documented in the drilling log. The operator shall notify the Fire Chief and the SCAQMD within 48 hours in the event a measurable amount of gas is burned by the flare, and shall specify the volume of gas that was burned in the flare. No drilling or redrilling shall be conducted in areas that are known to penetrate the Nodular Shale zone unless a fully operational and properly maintained gas buster and portable flare are installed on the rig. All other drilling and redrilling operations shall be conducted so that any measurable gas that is encountered can, and will, be retained in the wellbore until the gas buster and portable flare are installed on the rig, after which the gas will be run through the system. The operator shall immediately notify the fire chief and the SCAQMD in the event any gas from drilling or redrilling operations is released into the atmosphere without being directed to and burned in the flare.	No notifications to the Fire Chief or AQMD were required In 2020.
10	22.310.050.B.6 (E.2.f)	Oil Tank Pressure Monitoring and Venting. All oil tanks that contain or could contain oil shall have a fully operational pressure monitoring system that continuously measures and digitally records the pressure in the vapor space of each tank. The detection system shall notify the operator via an alarm when the pressure in the tank gets within 10 percent of the tank relief pressure. In the event of an alarm, the operator shall immediately take corrective action to reduce the tank pressure. The corrective action shall be documented in the operator's log. The operator shall notify the Fire Chief and the SCAQMD within 24 hours if the pressure in any tank covered by this Subsection ever exceeds such tank's relief pressure. Within seven calendar days after any tank vapor release, the operator shall report the incident to the SCAQMD as a breakdown event pursuant to Rule 430, and shall provide the Fire Chief with a written report of the event and the corrective measures undertaken and to be undertaken to avoid future oil tank vapor releases. The operator shall make any changes to such report that may be required to obtain approval from the Fire Chief and the SCAQMD, and shall promptly institute all corrective measures called for by the report.	No alarms requiring notification occurred In 2020; hence no notifications to the Fire Chief or the SCAQMD were necessary.
11	22.310.050.B.7 (E.2.g)	Odor Suppressant for Bioremediation Farms. When loading material or tilling material at the bioremediation farms, the operator shall use an odor suppressant such that no odor from the bioremediation farms can be detected at the outer boundary line.	The LAI North biofarm was operated in 2020 and is the only biofarm in operation. Odor suppressants are used during excavation of TPH impacted soils for processing in the biofarm area.
12	22.310.050.B.8 (E.2.h)	Odor Suppressant for Drilling and Redrilling Operations. The operator shall use an odor suppressant spray system on the mud shaker tables for all drilling and redrilling operations to ensure that no odors from said operations can be detected at the outer boundary line.	No drilling or redrilling activities occurred in 2020.
13	22.310.050.B.9 (E.2.i)	Closed Systems. The operator shall ensure all produced water and oil associated with production, processing, and storage, except those used for sampling only, are contained within closed systems at all times.	Closed systems were in place for all produced water and oil associated with production, processing and storage, except those used for sampling only.
14	22.310.050.B.10 (E.2.j)	Meteorological Station. The operator shall maintain and operate a meteorological station at the oil field in good operating condition and in compliance with all applicable Environmental Protection Agency ("EPA") and SCAQMD rules, regulations, and guidelines, and to the satisfaction of the Director. The operator shall conduct an audit of the meteorological station on an annual basis and submit the results of the audit to the SCAQMD and the Director. The operator shall maintain the data files for the meteorological station for a period of not less than 10 years. All such data shall be available upon request to the SCAQMD and the Director.	SPR maintains and operates a meteorological station at the field in compliance with this policy. The 2019 annual audit of the station was submitted to the County on 4/8/2020 and the 2020 annual audit is projected to be submitted in the spring or summer of 2021. SPR maintains data files for the station from CSD inception to present.



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15	22.310.050.B.11 (E.2.k)	Updated Health Risk Assessment. After every five years of operation of the meteorological station, the operator shall provide the previous five years of metrological data to the SCAQMD and the Director. If the SCAQMD or the Director determines that the previous five years of metrological data from the oil field could result in significant changes to the health risk assessment that was conducted as part of the Baldwin Hills Community Standards District Environmental Impact Report, then the county may elect to re-run the health risk assessment using the previous five years of metrological data from the metrological station.	The first five years of data was submitted to the SCAQMD and the Director on 12/2/2015. The second five years of data was submitted to the SCAQMD and the Director on 9/10/2020. The next five years of data is due in 2025.
16	22.310.050.B.12 (E.2.l)	Off-Road Diesel Construction Equipment Engines. All off-road diesel construction equipment shall comply with the following provisions: a. Utilize California Air Resources Board ("CARB") EPA Certification Tier III or better certified engines or other methods approved by the CARB as meeting or exceeding the Tier III standard or Tier II certified engines as long as no drilling or redrilling occurs during construction. b. Utilize a CARB Verified Level 3 diesel catalyst. The catalyst shall be capable of achieving an 85 percent reduction for diesel particulate matter. Copies of the CARB verification shall be provided to the Director. Said catalysts shall be properly maintained and operational at all times when the off-road diesel construction equipment is in use.	All off-road diesel construction equipment engines utilized Tier IV or better diesel engines plus Level 3 CARB verified diesel catalysts during all construction projects in 2020.
17	22.310.050.B.13 (E.2.m)	Drill Rig Engines. All drilling, redrilling, and reworking rig diesel engines shall comply with the following provisions: a. Utilize CARB/EPA Certification Tier II or better certified engines, or other methods approved by CARB as meeting or exceeding the Tier II standard. b. Utilize second generation heavy duty diesel catalysts capable of achieving 90 percent reductions for hydrocarbons and for particulate matter smaller than 10 microns. Said catalysts shall be properly maintained and operational at all times when the diesel engines are running.	No drilling occurred in 2020.
18	22.310.050.B.14 (E.2.n)	Drilling and Redrilling Setbacks. The following setbacks shall apply within the oil field for drilling or redrilling: a. At least 400 feet from developed areas. b. At least 20 feet from any public roadway.	All required drilling and redrilling setbacks set forth in this policy were complied with as documented in the 2020 Drilling Plan and all subsequent, individual well permits approved by the County. However, no drilling or redrilling occurred in 2020.
19	22.310.050.B.15 (E.2.o)	Construction Schedule. To reduce construction air emissions, no overlap shall be permitted in major facility construction and installation activities such as the steam drive plant, the water processing facility, or the oil cleaning plant.	There was no overlap in construction activity since no steam drive plant, water processing facility or oil cleaning plant were installed in 2020.
20	22.310.050.B.16 (E.2.p)	Fugitive Dust Control Plan. The operator shall comply with the provisions of a fugitive dust control plan that has been approved by the Director. The plan shall be based upon the requirements of SCAQMD Rule 403 and the SCAQMD CEQA Guideline Fugitive Dust Control Measures. The fugitive dust control plan shall be reviewed by the operator every five years to determine if modifications to the plan are required. Any modifications to the fugitive dust control plan shall be submitted to the Director for review and approval. The fugitive dust control plan shall include any measured requested by the Director.	The Fugitive Dust Control Plan was submitted on March 26, 2009 and revised and approved in April 2010. Compliance with the provisions of the Plan are verified by the County ECC. The Operator reviewed the Plan on 03/15/2020 and determined that no modifications to the plan are required. The County was notified of this determination on 03/19/2020. Next review due in April 2025.
21	22.310.050.C.1 (E.3.a)	Natural Gas Liquid Blending. Natural gas liquids at the gas plant shall be blended with the oil to the maximum allowable pipeline system vapor pressure. Natural gas liquids storage shall be limited to the volume allowed in the risk management plan approved by the Fire Department.	SPR blends the natural gas liquids (NGLs) to the maximum allowable pipeline system vapor pressure as required by the subject CSD provision requirement. The storage of the NGL tank is in compliance with the criteria in the Risk Management Plan. The LA County Fire Department verifies compliance with this provision via site inspections.
22	22.310.050.C.2 (E.3.b)	Propane and Natural Gas Liquids Bullet Fire-Proofing. The operator shall install and maintain fire-proofing insulation on all propane and natural gas liquids bullets within the oil field. The fire-proofing insulation shall have a minimum two-hour fire rating and otherwise be acceptable to the Fire Chief. All propane and natural gas liquid bullets shall be equipped with an automatic deluge system.	The propane and natural gas liquids bullet fire proofing was completed on February 23, 2009 with the associated documentation submitted to the LA County Fire Department on February 25, 2009.

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23	22.310.050.C.3 (E.3.c)	Steam Drive Plant Setback. The steam drive plant, if constructed, shall be located at least 1,000 feet from a developed area and shall use urea or equivalent, low toxicity material for any nitrogen oxide emission reduction that is required by the SCAQMD.	A steam drive plant has not been proposed or constructed to date.
24	22.310.050.C.4.a (E.3.d.i)	The operator shall ensure that all existing oil tank areas in the oil field, unless determined by the Director to be infeasible, and all the new oil tank areas shall have secondary containment (berms and/or walls) that can contain at least 110 percent of the largest oil tank volume to reduce the likelihood of oil spills entering the retention basins. In the event the Director determines that it would be infeasible to provide 110 percent containment for a particular existing oil tank, the operator shall provide such containment as the Director determines is feasible.	As documented in the Operator's 2009 Tank Leak Detection and Containment at Inglewood Oil Field report, approved in May 2009, all tanks have secondary containment per this provision.
25	22.310.050.C.4.b (E.3.d.ii)	All retention basins in the oil field shall be adequately sized, and maintained to handle a 100-year storm event plus a potential spill of the volume of the largest tank that would drain into each basin.	The Operator's Retention Basin Study, completed in March 2009 and revised in September 2009 and January 2010, analyzed and modeled the capacities of the basins along with a 100 year storm event. The study concluded that the onsite basins have the capability to handle a 100 year storm event without flooding per the CSD requirement. The study further determined that in the event of an oil tank failure during a 100 year storm event, the basin weir system would prevent oil from going offsite. The County Public Works Department has reviewed and approved the retention basin capacities.
26	22.310.050.C.4.c (E.3.d.iii)	All above ground piping in the oil field that contains or could contain oil shall be protected by basins or secondary containment measures (berms and/or walls).	Most of the above ground piping throughout the oil field is not protected by individual pipeline specific secondary containment or basin structures; however, the oil field retention basin system prevents any fluid from the above ground piping from traveling offsite.
27	22.310.050.D.1.a ,b and c (E.4.a.i, ii and iii)	D. Geotechnical - 1. Grading - a. All proposed grading shall be subject to prior review and approval by the Director of Public Works. b. Grading involving up to 5,000 cubic yards and grading associated with the bioremediation farms may be undertaken pursuant to a County master grading plan stamped by a registered professional engineer and a California-certified engineering geologist and approved by the Director of Public Works. c. No slope of cut or fill shall have a gradient steeper than two to one (2:1) unless specifically approved by a site specific geotechnical report. d. Cuts and fills shall be minimized to avoid erosion and visual impacts.	SPR conducts all grading in accordance with the Master Grading Plan as approved by the LA County Department of Public Works (DPW) on April 4, 2019. There are no forecast changes to grading for 2020. No modifications are necessary or required for potential grading and excavation operations in 2020 and as indicated in the LACDPW approved 2019 Master Grading Plan. Therefore no submittals or submittal approvals are needed for 2020.
28	22.310.050.D.2.a (E.4.b.i)	A site-specific geotechnical investigation shall be completed for grading in excess of 5,000 cubic yards, unless associated with the on-site Bioremediation Farms and approved pursuant to a master grading plan approved by the Director of Public Works, and for any grading that supports or impacts a critical facility as determined by the Director. The investigation shall be completed by a California-certified engineering geologist and submitted to the Director and the Director of Public Works for review and approval, in conjunction with an application for a revised grading permit.	No grading that occurred in 2020 triggered the requirement for a site specific geotechnical investigation.
29	22.310.050.D.2. b (E.4.b.ii)	A site-specific geotechnical investigation shall be completed for all proposed permanent structures. The investigation shall include analysis and recommendations associated with potential seismically induced ground failure, such as differential settlement and lateral spreading. The geotechnical investigation shall be completed by a California-certified engineering geologist and submitted to the Director of Public Works for review and approval.	No permanent structures were proposed or built in 2020; hence no site specific geotechnical investigations were necessary.



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30	22.310.050.D.3.a (E.4.c.i)	The operator shall comply with all provisions of an erosion control plan that has been approved by the director. The erosion control plan shall be reviewed by the operator every two years to determine if modifications to the plan are required. Any modifications to the erosion control plan shall be submitted to the director for review and approval. The erosion control plan shall include any measures requested by the director.	The Operator's 2009 Erosion Control Plan Inglewood Oil Field was initially submitted on May 26, 2009, revised in October 2009 and approved by County Public Works in May 2010. The Operator reviewed the Erosion Control Plan on 6/18/2020 and determined that no modifications to the plan are required. The next bi-annual review will occur in May of 2022.
31	22.310.050.D.4 (E.4.d)	Restoration of Slopes. Slopes shall be restored to their original grade once the use that required the grading of the slope has been discontinued. However, if restoration of a slope would negatively affect existing drainage patterns or slope stability, then the slope shall be restored to a grade that avoids these negative effects.	No grading that would negatively affect existing drainage patterns or slope stability occurred in 2020.
32	22.310.050.D.5 (E.4.e)	Ground Movement Surveys. The operator shall conduct ground movement surveys once every 12 months, or more frequently if determined necessary by the director of public works, following all provisions of a ground movement monitoring plan that is acceptable to CalGEM (formerly DOGGR) and the director of public works, that calls for both vertical and horizontal ground movement surveys, at specified survey locations within, and in the vicinity of, the oil field, utilizing high precision Global Positioning System technology, in combination with a network of ground stations (or any alternative technology specified in the ground movement monitoring plan approved by the director of public works), and following other survey methods outlined in the plan. The surveys shall be conducted by a California-licensed surveyor. The survey results shall be analyzed in relation to oil field activities, such as production, steam injection, and water flooding, taking into consideration individual oil producing zones, injection schedules, rates, volume, and pressure. The analysis shall be completed in collaboration by a California-registered professional petroleum engineer, registered geotechnical engineer, and certified engineering geologist. The results of the annual monitoring survey and analysis shall be forwarded to CalGEM and the director of public works. If requested by CalGEM or the director of public works, the operator shall make modifications to the ground movement monitoring plan. In the event that survey indicates that on-going ground movement, equal to or greater than 0.6 inches at any given location, or a lesser value determined by the director of public works is occurring in an upward or downward direction in the vicinity of or in the oil field, the operator shall review and analyze all claims or complaints of subsidence damage that have been submitted to the operator or the county by the public or a public entity in the 12 months since the last ground movement survey. Based thereon, the operator shall prepare a report that assesses whether any of the alleged subsidence damage was caused by oil operations and submit said report to CalGEM and the department of public works. The department of public works shall review the report to determine if it concurs with its conclusions. If the report concludes that damage has not been caused by oil operations, and the department of public works does not concur in that conclusion, it shall forward its conclusions to CalGEM for its review and possible action. If the report concludes that damage was caused by oil operations and the department of public works concurs with any such conclusion, the department of public works shall forward the department of public works' conclusions to CalGEM and ask CalGEM to evaluate the operator's fluid injection and withdrawal rates to determine whether adjustments to these rates may alleviate the ground movement, and if so, where in the oil field such adjustments should be made. The operator shall implement whatever adjustments in the rates of fluid injection and/or withdrawal that CalGEM determines are necessary and appropriate to alleviate any ground movement damage. The county shall promptly notify the CAP of any such action that is taken pursuant to this subsection. Injection pressures associated with secondary recovery operations (i.e., water flooding) or disposal of produced fluids shall not exceed reservoir fracture pressures as specified in Title 14 of the California Code of Regulations, section 1724.10, and as approved by the CalGEM.	Ground movement surveys have been completed as required by the approved Accumulated Ground Movement Plan. The Year 2019 annual survey was submitted on February 20, 2020 to DRP, DPW and CalGEM (formerly DOGGR). The Year 2020 annual survey (covering January 2019-June 2020) was submitted on January 4, 2021 to DRP and CalGEM. The production season was extended for this report due to issues associated with COVID-19.
33	22.310.050.D.6 (E.4.f)	Construction of Permanent Structures. No permanent structures shall be constructed in an Alquist-Priolo Fault Zone without preparation of a fault study by a California-certified engineering geologist. Following the fault study, no permanent structures shall be placed within 50 feet of a known active fault. The fault investigation report shall be submitted to the director of public works for review and approval.	No permanent structures have been constructed in an Alquist-Priolo Fault Zone since the adoption of the CSD.

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34	22.310.050.D.7 (E.4.g)	Oil Field Accelerometer. The operator shall operate and maintain an accelerometer at the oil field to determine site-specific ground accelerations as a result of any seismic event in the region (Los Angeles/Orange County and offshore waters of the Santa Monica Bay and San Pedro Channel). Readings from the accelerometer shall be recorded at the oil field and transmitted in real-time to the Caltech Seismological Laboratory. The operator shall cease operations and inspect all oil field pipelines, storage tanks, and other infrastructure following any seismic event that exceeds a ground acceleration at the oil field of 13 percent of gravity (0.13 g) and promptly notify the director. The operator shall not reinstitute operations at the oil field and associated pipelines until it can reasonably be determined that all oil field infrastructure is structurally sound.	The oil field accelerometer seismic station was installed and began collecting data on May 20, 2009. The data is transmitted in real time by cell link to the CalTech Seismological Laboratory where the data is recorded and stored. The accelerometer has not measured ground acceleration in excess of the 13 percent of gravity (0.13 g) criteria of this provision to date, thus the oil field has not been required to shut in due to a ground acceleration event.
35	22.310.050.D.8 (E.4.h)	Pipeline Management Plan. The operator shall maintain and implement a pipeline management plan that meets the requirements of CalGEM (formerly DOGGR) regulations.	The pipeline management plan is being maintained per CalGEM (formerly DOGGR) regulations.
36	22.310.050.D.9 (E.4.i)	Paleontological Monitor. The operator shall have a qualified paleontologist, approved by the director, monitor all rough grading and other significant ground disturbing activities in paleontological sensitive sediments. The sensitive sediments that have been identified within the oil field include the Lower to Middle Pleistocene San Pedro Formation and the Middle to Upper Pleistocene Lakewood Formation. A paleontologist will not be required on site if excavation is only occurring in artificial fill or Holocene alluvium.	In 2020, no work occurred in paleontological sensitive sediments. As such, no monitoring occurred.
37	22.310.050.E.1 (E.5.a)	22.310.050.E.1: Noise Limits. The operator shall comply with the following provisions: a. All oil operations on the oil field shall comply with the noise provisions of Chapter 12.08 of Title 12 of the County Code, with the exception of drilling, redrilling, and reworking, which are exempt from the provisions of said chapter. b. Hourly, A-weighted equivalent noise levels associated with drilling, redrilling, and reworking shall not elevate existing baseline levels by more than five dBA at any developed area. For daytime activities (7:00a.m. to 7:00p.m.) existing baseline noise levels shall be defined as the maximum daytime equivalent noise level (Leq) at the closest monitoring site as shown in Table 4.9.3 of the 2008 Baldwin Hills Community Standards District Environmental Impact Report. For nighttime activities (7:00 p.m. to 7:00a.m.), existing baseline noise levels shall be defined as the minimum nighttime equivalent noise level (Leq) at the closest monitoring site as shown in Table 4.9.3 of the 2008 Baldwin Hills Community Standards District Environmental Impact Report. Updated baseline noise levels may be set and additional monitoring sites may be established, from time to time by the director. In no case shall baseline noise levels include any drilling, redrilling, or reworking operations. c. Noise produced by oil operations shall include no pure tones when measured at a developed area.	Noise monitoring to date has not identified any violations associated with oil field operations above the baseline levels of the noise limits set forth in the CSD or Settlement Agreement.
38	SA 2	a. The CSD currently provides that hourly, A-weighted equivalent noise levels associated with drilling, redrilling and reworking wells shall not elevate baseline levels (which shall not include drilling, redrilling or reworking operations) by more than five A-weighted decibels ("dBA") at the Oil Field boundary of any Developed Area. Instead of the referenced five dB A provision, PXP shall limit the night time (10 p.m. to 7 a.m.) noise levels at Developed Areas to no more than three dBA above a one-hour baseline average for the defined nighttime period, but at no time will PXP be required to maintain noise levels below the baseline nighttime noise levels. Furthermore, PXP and the County determined the baseline noise levels at four additional Oil Field boundary locations near Developed Areas, selected by PXP and the County, in addition to the seven utilized in the EIR for a total of 11 locations. If PXP violates the above noise requirements, no new drilling or redrilling permits shall be issued by the County until PXP, in consultation with the County, identifies the source of the noise and PXP takes steps necessary to assure compliance with the above-specified threshold. b. If drilling, redrilling or reworking operations elevate nighttime baseline noise levels by more than 10 dBA for more than 15 minutes in any one hour as independently verified and determined by the County, PXP, in consultation with the County, shall identify the cause and source of the noise and take steps to avoid such extended periods of noise elevation in the future. This provision does not negate the CSD noise limits between 7 a.m. to 10 p.m.	Noise monitoring to date has not identified any violations associated with oil field operations above the baseline levels of the noise limits set forth in the CSD or Settlement Agreement.

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39	22.310.050.E.2 (E.5.b)	Backup Alarms. Backup alarms on all vehicles operating within the oil field shall be disabled between the hours of 8:00 p.m. and 8:00 a.m. During periods when the backup alarms are disabled, the operator shall employ alternate, low-noise methods for ensuring worker safety during vehicle backup, such as the use of spotters.	This provision has been implemented and is ongoing.
40	22.310.050.E.3 (E.5.c)	Quiet Mode Drilling Plan. All drilling and re-drilling on the oil field between the hours of 6:00 p.m. and 8:00 a.m. shall be conducted in conformity with a quiet mode drilling plan that has been approved by the director and the director of public health. The quiet mode drilling plan shall be reviewed by the operator every year to determine if modifications to the plan are required. The operator shall make changes to the plan if requested by the director or the director of public health. Any modifications to the quiet mode drilling plan shall be submitted to the director and the director of public health for review and approval. The quiet mode drilling plan shall include any measures requested by the director or the director of public health.	No drilling and re-drilling activities occurred in 2020. SPR reviewed the Quiet Mode Drilling Plan on 12/7/2020 and concluded that there are no modifications necessary to the plan.
41	22.310.050.E.4 (E.5.d)	Equipment Servicing. All noise producing oil field equipment shall be regularly serviced and repaired to minimize increases in pure tones and other noise output over time. The operator shall maintain an equipment service log for all noise-producing equipment.	SPR Operations maintains service records for such equipment.
42	22.310.050.E.5 (E.5.e)	Deliveries to the Oil Field. Deliveries to the oil field shall not be permitted after 8:00 p.m. and before 7:00a.m. except in cases of emergency. Deliveries on Sundays or legal holidays shall not be permitted after 8:00 p.m. or before 9:00a.m., except in cases of emergency.	This provision has been implemented and is ongoing.
43	22.310.050.E.6 (E.5.f)	Deliveries within the Oil Field. Deliveries to areas of the oil field located within 500 feet of any residential property shall not be permitted after 5:00 p.m. or before 7:00a.m. except in cases of emergency. Deliveries to such areas on Sundays or legal holidays shall not be permitted after 5:00 p.m. and before 9:00a.m., except in cases of emergency.	This provision has been implemented and is ongoing.
44	22.310.050.E.7 (E.5.g)	Time Limits for Construction. Construction of permanent structures shall not be permitted after 7:00 p.m. and before 7:00a.m., or during Saturdays, Sundays, or legal holidays.	No construction occurs after 7:00 p.m. and before 7:00 a.m., or during Saturdays, Sundays, or legal holidays.
45	22.310.050.E.8 (E.5.h)	Construction Equipment. All construction equipment shall be selected for low-noise output. All construction equipment powered by internal combustion engines shall be properly muffled and maintained.	All construction equipment is selected to comply with this provision.
46	22.310.050.E.9 (E.5.i)	Construction Equipment Idling. Unnecessary idling of construction equipment internal combustion engines is prohibited.	All SPR construction equipment operators implement this provision.
47	22.310.050.E.10 (E.5.j)	Worker Notification. The operator shall instruct employees and subcontractors about the noise provisions of this subsection (E.5) 050.E prior to commencement of each and every drilling, re-drilling, reworking, and construction operation, and shall annually certify to the director that such employees and subcontractors have been properly trained to comply with such noise provisions. The operator shall prominently post quiet mode policies at every drilling and re-drilling site.	No drilling or re-drilling occurred in 2020.
48	22.310.050.F (E.6)	Vibration Reduction. All oil operations on the oil field shall be conducted in a manner that minimizes vibration. Additionally, vibration levels from oil operations at the oil field shall not exceed a velocity of 0.25 mm/s over the frequency range 1 to 100 Hz at any developed area.	All operations are conducted to minimize vibration. The report prepared by the County in response to the request by PXP in October 2011 to increase the annual number of wells allowable for drilling or re-drilling, the Annual Well Increase Evaluation, December 2011, includes analysis on the implementation of the vibration provision of the CSD. The report concluded that the CSD requirements have been effective at keeping vibration to a level that is considered protective of the health and general welfare of the public. Further, the draft periodic review concluded that this provision is fully effective.

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49	22.310.050.G.1 (E.7.a)	Oil Spill Response. The operator shall comply with all provisions of an Emergency Response Plan ("ERP") that has been approved by the director, to protect biological species and to revegetate any areas disturbed during an oil spill or clean-up activities. The operator shall make changes to the ERP if requested by the director. Any modifications to the ERP shall be submitted to the director for review and approval. The ERP shall include any measures to protect biological species that may be requested by the director.	Since approval of the ERP by DRP, no updates have been needed or requested.
50	22.310.050.G.2 (E.7.b)	Special Status Species and Habitat Protection. The operator shall comply with all provisions of a special status species and habitat protection plan that has been approved by the director. The operator shall make changes to the plan if requested by the director. Any modifications to the plan shall be submitted to the director for review and approval. The special status species and habitat protection plan shall include any measures requested by the director.	The Special Status Species and Habitat Protection Plan was first prepared in 2009 and was approved on November 15, 2010. The plan was prepared by a County approved ecologist/biologist. Compliance with subsections E.7.b through E.7.h has been documented annually since 2010. The 2020 compliance report was submitted in March 2021.
51	22.310.050.G.3, 8 (E.7.c, h)	<p>3) Habitat Restoration and Revegetation Plan. Prior to any disturbance of sensitive natural habitat areas, as identified in the special status species and habitat protection plan, the operator shall hire a biologist, approved by the county, to conduct a survey of the area to determine if significant impact to sensitive natural habitat, including coastal sagebrush, coyote bush scrub, riparian scrub, and oak woodland will occur. If the biologist determines that significant impact to sensitive natural habitat will occur, then the operator shall have a county-approved restoration specialist, with expertise in southern California ecosystems and revegetation techniques, prepare a habitat restoration and revegetation plan. The plan shall be submitted to the director for review and approval. The director shall make best efforts to complete the review of the plan as expeditiously as possible and shall then either approve the plan or provide the operator with a list of specific items that must be included in the plan prior to approval. No removal of sensitive natural habitat shall occur until the plan has been approved by the director. The habitat restoration and revegetation plan shall include any measures requested by the director.</p> <p>8) Habitat Restoration. Within 60 days of completion of construction activities that have significantly impacted sensitive natural habitat, the operator shall begin habitat restoration consistent with the approved native habitat restoration and revegetation plan discussed in subsection 050.G.3. Restoration priority shall be given to areas of degraded habitat connecting areas of higher quality habitat and where restoration would produce larger corridors to support the migration and movement of wildlife. The operator shall replace any significant loss of sensitive natural habitat at the following ratios:</p> <p>a. 1:1 for each acre of coastal sagebrush or coyote bush scrub.</p> <p>b. 2:1 for each acre of riparian scrub or oak woodland.</p>	No Habitat Restoration and Revegetation Plans were necessary in 2020.

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52	22.310.050.G.4, 5,6,7 (E.7.d, e, f, g)	<p>4) Pre-Construction Surveys. The following surveys shall be conducted prior to any significant vegetation removal in sensitive natural habitat as identified in the special status species and habitat protection plan.</p> <p>5) Listed Plant or Wildlife Species. If federal- or State-listed plant or wildlife species are found, then the operator shall comply with all applicable United States Fish and Wildlife and California Department of Fish and Game rules and regulations.</p> <p>6) Construction Monitoring. If the pre-construction surveys find sensitive plant, wildlife species, or nesting birds, a biological monitor hired by the operator, and approved by the County, shall be on site during construction to monitor the construction activities.</p> <p>7) Tree and Riparian Scrub Removal. Removal of native or non-native trees and riparian scrub vegetation shall be scheduled, as possible, for removal outside the nesting season to avoid impacts to nesting birds. If avoidance of removal of trees or riparian scrub during the recommended periods is not possible, a county-approved biologist shall perform a survey to ensure that no nesting birds are present prior to removal. If for any reason a nest must be removed during the nesting season, the operator shall provide written documentation to the director demonstrating concurrence from the United States Fish and Wildlife Service and California Department of Fish and Game authorizing the nest relocation and a written report documenting the relocation efforts.</p>	Any required pre-construction surveys or construction monitoring that was completed in 2020 is documented in the 2020 Special Status Species and Habitat Protection Plan annual report submitted in March 2021. No listed plant or wildlife species were found.
53	22.310.050.H.1 (E.8.a)	Cone Trust House. Oil operations shall not result in impacts to the Cone Trust House	The Cone Trust House is off limits to oil field staff to prevent any impacts to the building.
54	22.310.050.H.2 (E.8.b)	050.H.2: Archaeological Training. The operator shall provide archeological training for all construction personnel who will be involved with ground disturbance activities at the oil field. All such construction personnel shall be required to participate in the training and will receive training material prepared by a qualified archaeologist prior to working on ground disturbance activities.	All construction personnel involved with ground disturbance activities were provided archeological training in 2020. No construction operations occurred in 2020.
55	22.310.050.H.3 (E.8.c)	Construction Treatment Plan. The operator shall comply with all provisions of a construction treatment plan, approved by the director, to ensure that any new archeological discoveries are adequately recorded, evaluated, and, if significant, mitigated. In the event that unknown archaeological artifacts are encountered during grading, clearing, grubbing, and/or other construction activities, work shall be stopped immediately in the vicinity of the find and the resource shall be evaluated by a qualified archaeologist, approved by the director. The construction treatment plan shall include any measures requested by the director.	No archaeological artifacts were uncovered In 2020.
56	22.310.050.I (E.9)	<p>Lighting. Outdoor lighting shall be restricted to only those lights which are required by code for the lighting of building exteriors, drilling, and re-drilling rigs and for safety and security needs. In addition, the operator shall comply with the following provisions:</p> <p>1. Screening. All new point lighting sources within the oil field shall be screened and directed to confine direct rays to the oil field and to prevent offsite spillover lighting effects to the extent feasible.</p> <p>2. Lighting Plan. A detailed lighting plan shall be prepared for each new permanent structure and submitted to the director for review and approval. No work may be commenced on such permanent structure until the lighting plan therefore has been approved by the director. The lighting plan shall include any measures requested by the director.</p>	In November 2008, an assessment of all oil field lighting was completed to confirm compliance with the CSD lighting provisions and to confirm that there were no offsite lighting impacts.

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57	22.310.050.J (E.10) SA 11 22.310.070.G (G.7) (2015)	<p>050.J: Landscaping, Visual Screening, Irrigation and Maintenance. The operator shall comply with the conceptual landscaping plan for the oil field prepared by Mia Lehrer &amp; Associates, dated October 2008, on file at the department of regional planning, which is intended to beautify and screen the oil field from adjoining residential, recreational, and institutional areas or adjacent public streets or highways. Landscaping required by this plan shall be completed in phases over a two-to five-year period as approved by the director. All landscaping on the oil field shall be routinely inspected (on at least a monthly basis) and maintained in a neat, clean, and healthful condition, including proper watering, pruning, weeding, fertilizing, and replacement of plants as needed. Litter shall also be removed on a regular basis.</p> <p>SA 11: Landscaping. Operator agrees to prepare and implement a series of landscape plans ("Landscape Plans") that enhance the Mia Lehrer Landscape Improvements Concepts plan dated November 4, 2008 to include, but not be limited to, landscaping along or near the border of the Oil Field in consultation with the County and subject to the County's approval. Operator's Landscape Plans shall be forwarded to the CAP for review. Operator will use best efforts to complete installation of the first two phases of the Landscape Plans along La Brea, between Stocker and Slauson, and Ladera Crest, within nine (9) months of County's final approvals of each of those first two Landscaping Plans using best landscaping practices. Operator agrees that it will complete the entire landscaping required by the County-approved Landscape Plans within three years after approval by the County of the final phase.</p> <p>070.G (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section 070.G of CSD recommended that "Operator schedule installation of the remaining 050.J landscaping phases to achieve the landscaping required by this provision in a timely manner.</p>	<p>The landscaping plan for the Inglewood Oil Field was phased in 7 components with all work completed by December 2018.</p> <p>The Settlement Agreement required that all landscaping be completed within three years of approval by the County of the final phase plan; since final approval of Phases 6 and 7 was approved in April 2016, all landscaping was required to be completed by April 2019. Therefore, as all required landscaping was completed in December 2018, the landscaping terms of the Settlement Agreement have been completed. Ongoing inspections and landscaping maintenance are conducted on a semi-annual basis.</p> <table border="1" style="width: 100%; text-align: center;"> <thead> <tr> <th>Phase</th> <th>Plan</th> <th>Landscaping</th> </tr> </thead> <tbody> <tr> <td>1-Ladera Crest View-shed North</td> <td>Approved 5/11/11</td> <td>Completed 10/20/11</td> </tr> <tr> <td>2-Windsor Hills La Brea View-shed</td> <td>Approved 10/11/11</td> <td>Completed 6/12/12</td> </tr> <tr> <td>3-La Brea View-shed East/La Cienega Blvd</td> <td>Approved 6/6/13</td> <td>Completed 12/1/18</td> </tr> <tr> <td>4-La Cienega Roadway East</td> <td>Approved 6/6/13</td> <td>Completed 11/10/16</td> </tr> <tr> <td>5-La Cienega Roadway West</td> <td>Approved 6/6/13</td> <td>Completed 11/1/15</td> </tr> <tr> <td>6-Fairfax Ave Roadway East and West</td> <td>Approved 4/19/16</td> <td>Completed 11/1/17</td> </tr> <tr> <td>7-Stocker Street Roadway North and South</td> <td>Approved 4/19/16</td> <td>Completed 12/31/18</td> </tr> </tbody> </table>	Phase	Plan	Landscaping	1-Ladera Crest View-shed North	Approved 5/11/11	Completed 10/20/11	2-Windsor Hills La Brea View-shed	Approved 10/11/11	Completed 6/12/12	3-La Brea View-shed East/La Cienega Blvd	Approved 6/6/13	Completed 12/1/18	4-La Cienega Roadway East	Approved 6/6/13	Completed 11/10/16	5-La Cienega Roadway West	Approved 6/6/13	Completed 11/1/15	6-Fairfax Ave Roadway East and West	Approved 4/19/16	Completed 11/1/17	7-Stocker Street Roadway North and South	Approved 4/19/16	Completed 12/31/18
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58	22.310.050.K.1 and 2 (E.11.a and b)	<p>Oil Field Waste Removal. The operator shall comply with the following provisions:</p> <p>1) Waste Collection. All drilling, redrilling, and reworking waste shall be collected in portable steel bins compliant with United States Department of Transportation standards. Any drilling, redrilling, and reworking wastes that are not intended to be injected into a Class II Well, as permitted by CalGEM (formerly DOGGR), shall be removed from the oil field no later than 30 days following completion of the drilling, redrilling, and reworking. This provision does not apply to active sumps and mud pits.</p> <p>2) Waste Discharge. No oil field waste shall be discharged into any sewer, storm drain, irrigation systems, stream or creek, street, highway, or drainage canal. Nor shall any such wastes be discharged on the ground provided that the foregoing shall not prohibit the proper use of active drilling sumps and mud pits.</p>	<p>All reworking wastes were collected in portable steel bins compliant with USDOT standards and removed from the field within 30-days of completion of the activity. No drilling or redrilling occurred in 2020. There are no sumps or mud pits on the field. No oil field waste was discharged off site.</p>																								
59	22.310.050.K.3 (E.11.c)	<p>Recycling Plan. The operator shall comply with all provisions of a recycling plan that has been approved by the director. The recycling plan shall include any elements requested by the director.</p>	<p>The Recycling Plan was approved on October 3, 2011 and has been implemented and is ongoing.</p>																								
60	22.310.050.L (E.12)	<p>Construction of Private Roads. Roads and other excavations shall be designed, constructed, and maintained to provide stability of fill, minimize disfigurement of the landscape, prevent deterioration of vegetation, maintain natural drainage, and minimize erosion. Prior to construction of any new road, the operator shall prepare and submit to the director of public works for review and approval a private road construction plan. The operator shall thereafter comply with all provisions of the approved private road construction plan. All new private access roads leading off any surfaced public street or highway shall be paved with asphalt or concrete not less than three inches thick for the first 50 feet of said access road from the public street or highway.</p>	<p>No private roads have been constructed to date and all oil field activities utilize existing access roads.</p>																								



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61	22.310.050.M.1-5 (E.13.a-e)	<p>Signs. All signage shall comply with Part 10 of Chapter 22.52 of Title 22. In addition, the operator shall comply with the following provisions:</p> <ol style="list-style-type: none"> <li>1. Perimeter Identification Signs. Identification signs, at intervals acceptable to the director, shall be posted and maintained in good condition along the outer boundary line fence and along the fences adjoining the public roads that pass through the oil field. Each sign shall prominently display current and reliable emergency contact information that will enable a person to promptly reach, at all times, a representative of the operator who will have the expertise to assess any potential problem and recommend a corrective course of action. Each sign shall also have the telephone number of the county department of regional planning zoning enforcement section and the number of SCAOMD that can be called if odors are detected.</li> <li>2. Main Entrance Sign. A sign shall be posted and maintained in good condition at the main entrance of the oil field prominently displaying a telephone number by which persons may contact a representative of the operator at all times to register complaints regarding oil field operations.</li> <li>3. Other Required Signs. All identification signs, warning signs, no trespassing signs, and other signs required by county, state and federal regulations shall be properly posted and maintained in all required locations and in good condition.</li> <li>4. Well Identification Signs. Well identification signs including the well name and well number shall be posted and maintained in good condition at each well location.</li> <li>5. No Littering Signs. "No littering" signs shall be prominently posted and maintained in good condition on all oil field entrance gates.</li> </ol>	<p>The installation of the signage required by this provision was completed upon approval of the Signage Plan dated January 2009 (Revision1) and approved by the County on May 18, 2009. In 2018, all required signage was updated to reflect to the name new Operator, Sentinel Peak Resources (SPR), of the oil field, and to remove the name of the previous Operator, Freeport-McMoRan Oil &amp; Gas (FM O&amp;G).</p>
62	22.310.050.N (E.14)	<p>Painting. All oil operation-related structures visible from public roadways and surrounding properties within the oil field shall be painted or otherwise surfaced or textured with a color that is compatible with the surrounding areas and has been approved by the director. The painting or other surfacing of all structures covered by this subsection shall thereafter be maintained in good condition.</p>	<p>The painting of the Inglewood Oil Field structures and equipment was completed on November 12, 2012. The paint color, licorice, was chosen with assistance of a landscape architect and was approved by the LA County Department of Regional Planning. Maintenance of the painting and coatings of the equipment and structures at the oil field is a continuous process.</p>
63	22.310.050.O (E.15) 22.310.070.G (G.7) (2015)	<p>Sumps. The operator shall comply with all of the following provisions:</p> <ol style="list-style-type: none"> <li>1. Sump Clean Out. All sumps that are used, installed, or maintained for use in connection with any well, and which have not been used for 90 days for the operation of or the drilling, redrilling, or reworking of such well or any other well in the vicinity, shall be cleaned out, and all oil, rotary mud, and rubbish removed.</li> <li>2. Sump Fencing. Around each sump of any depth, there shall be erected and continuously maintained a fence that encloses the sump and complies with the requirements of Sections 11.48.010 - 11.48.050, Title 11 of the County Code. This provision shall not apply to sumps that are constantly and immediately attended while drilling, redrilling, and reworking operations are proceeding as specified in Section 11.48.020, Title 11 of the County Code.</li> </ol> <p>070.G (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section 070.G of CSD recommended that "the Operator continue the use of metal and or plastic bins 050.O.1 and tanks consistent with current practice as the elimination of the use of below ground sumps is considered to be a significant environmental benefit.</p>	<p>There are no sumps at the Inglewood Oil Field.</p>

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64	22.310.050.P.1-4 (E.16.a-d)	<p>Well Cellars. All well cellars shall be constructed in accordance with the most current American Petroleum Institute standards. In addition, the operator shall comply with the following provisions:</p> <ol style="list-style-type: none"> <li>1. Cellar Fluids. Well cellars shall be kept free of all oil, water, or debris at all times. During drilling, redrilling, and reworking, the cellar shall be kept free of excess fluids by a pump which discharges into a waste tank, mud pit, vacuum truck, or other approved disposal system.</li> <li>2. Access to Multi-Well Cellars. All multi-well cellars exceeding three feet in depth and 25 feet in length shall have two means of entrance and exit and an additional exit for every 50 feet in length thereafter. At least one means of entrance or exit for all multi-well cellars of 25 feet in length shall be a stairway constructed to California Division of Industrial Safety standards.</li> <li>3. Single-Cellar Covers. All single-cellars shall be covered with open grating and have no openings larger than three inches at any point. Covers shall be capable of supporting vehicle weight or guardrails shall be erected to prevent vehicle access.</li> <li>4. Cellar Ladder Openings. All openings for ladders through grating shall be designed to allow exit from underside without obstruction and shall be kept free of storage of any type. Said openings shall not be less than 24 inches on either side.</li> </ol>	Implementation is ongoing where applicable.
65	22.310.050.Q.1 (E.17.a)	<p>Construction Storm Water Pollution Prevention Plan ("SWPPP"). The operator shall maintain and implement all provisions of a storm water pollution prevention plan ("SWPPP") that has been inspected by the Regional Water Quality Control Board and the county department of public works. The operator shall provide the director and the director of public works with a copy of the SWPPP, and any future modifications, revisions, or alterations thereof, or replacements therefore. The SWPPP shall be updated prior to new construction activities as required by the Regional Water Quality Control Board.</p>	The DPW was provided with the most up-to-date copy of the RWQCB reviewed SWPPP on 11/26/13. As part of our new NPDES Stormwater Permit, we sent RWQCB an updated SWPPP in July 2020.
66	22.310.050.Q.2 (E.17.b)	<p>Spill Prevention, Control, and Countermeasure Plan ("SPCCP"). The operator shall maintain and implement all provisions of a spill prevention, control, and countermeasure plan ("SPCCP") which meets the requirements of the Local California Unified Program Agency and the United States Environmental Protection Agency. The operator shall provide the director and the fire chief with a copy of the SPCCP and any future modifications, revisions, or alterations thereof, or replacements therefore.</p>	SPR provided DRP and the Los Angeles County Fire Department (LACFD) a copy of the most up-to-date SPCC on 03/16/21. This is the most recent SPCC plan and was updated in December 2020.
67	22.310.050.Q.3 (E.17.c)	<p>Hydrological Analysis. A site-specific hydrologic analysis shall be completed to evaluate anticipated changes in drainage patterns and associated increased runoff at the site for any new grading that results in the loss of vegetated, sandy, permeable ground areas, which could alter surface runoff at the site. The analysis shall be completed consistent with Standard Urban Stormwater Mitigation Plan regulations, as specified in the county department of public works Hydrology Manual as amended. The hydrological analysis shall be submitted to the director of public works for review and approval. The new grading that required the hydrologic analysis shall not occur until approval of the analysis by the director of public works.</p>	The hydrologic analysis has not occurred to date because no oil field projects have triggered the requirement.
68	22.310.050.R (E.18)	<p>Water Management Plan. The operator shall comply with all provisions of a water management plan that has been approved by the director and the director of public works. The plan shall include best management practices, water conservation measures, the use of a drip irrigation system, and shall include provisions for the use of surface water runoff in the retention basins for dust suppression and landscaping. The plan shall also address the availability of reclaimed water for use at the oil field. The water management plan shall be reviewed by the operator every three years to determine if modifications to the plan are required. The operator shall make changes to the plan if requested by the director or the director of public works. Any modifications to the water management plan shall be submitted to the director and the director of public works for review and approval. The water management plan shall include any elements requested by the director or the director of public works. In addition, the operator shall comply with the water conservation measures and reporting requirements specified in Sections 20.09.020- 20.09.080, Title 20 of the County Code (Utilities).</p>	The Water Management Plan was initially submitted in May 2009 and was formally approved by County Public Works on August 8, 2012 and the County DRP on September 13, 2012. The County has not required any changes to the Plan since then. The Operator reviewed the Water Management Plan on 09/19/18 and determined that no changes are necessary. The next triennial review will occur in September of 2021.



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69	22.310.050.S (E.19) 22.310.070.G (G.7) (2015)	<p>050.S: Groundwater Monitoring. The operator shall develop, implement, and carry out a groundwater quality monitoring program for the oil field that is acceptable to the director and consistent with all requirements of the Regional Water Quality Control Board. Pursuant to the approved program, the operator shall install and maintain groundwater monitoring wells in the vicinity of each surface water retention basin, which is permitted by the Regional Water Quality Control Board. Such monitoring wells shall be completed to the base of the permeable, potentially water bearing, alluvium, Lakewood Formation, and San Pedro Formation, and to the top of the underlying, non-water bearing Pica Formation, as determined by a California-certified professional geologist. The Regional Water Quality Control Board and the director shall be regularly advised of the results of such monitoring and shall be immediately advised if such monitoring indicates a potential problem.</p> <p>070.G: The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section 070.G of CSD recommended that "the Operator coordinate with the RWQCB and install additional groundwater monitoring wells if deemed necessary."</p>	<p>Quarterly groundwater sampling was conducted on a quarterly basis consistent with the provisions of the Groundwater Monitoring Program and Work plan, and monitoring reports were submitted to DRP and the Los Angeles Regional Water Quality Control Board (RWQCB) quarterly.</p> <p>As noted in 070.G (2015), the RWQCB submitted a comment letter to DRP on 10/17/12 regarding the 2013 Annual Drilling Plan (050.Z.3) that recommended the installation of "an up-gradient groundwater quality monitoring well (or network) that can establish water quality conditions at the perimeter of the field." Subsequently, in 2013, the RWQCB evaluated the field's groundwater monitoring program as part of the land treatment unit permit renewal process. The permit was amended from the prior 2010 permit to reflect the following:</p> <ul style="list-style-type: none"> <li>• Shallow wells for semi-annual monitoring (rather than the quarterly monitoring previously required in the 2010 permit) include MW-2, 3, 5, 6, 7, 8 and 9;</li> <li>• A new requirement for deep well annual monitoring of MW 11B and 13.</li> <li>• A new requirement to conduct statistical analysis of the results of the groundwater quality monitoring to identify background conditions, and changes from background conditions (if any). Regulatory action triggers were established in the event that changes from background conditions are detected.</li> </ul> <p>As such, through the 2013 land treatment unit permit renewal process, the RWQCB re-evaluated and on 2/7/13 approved the groundwater monitoring program with changes as iterated above that respond to their concerns in their 10/17/12 comment letter. Therefore, this periodic review recommendation has been fulfilled. For 2020, Quarterly Groundwater Monitoring was conducted each quarter as described in the monitoring reports submitted to CSD and dated April, July, &amp; October 2020, and January 2021.</p>
70	22.310.050.T (E.20) 22.310.070.G (G.7) (2015)	<p>Fencing. All portions of the oil field on which oil operations are conducted shall be enclosed with a fence compliant with CalGEM (formerly DOGGR) regulations codified at California Code of Regulations Title 14, Article 3, sections 1778 and 1779, or as may be subsequently amended by the state.</p> <p>the</p> <p>070.G: The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section 070.G of CSD recommended that "the ECC and the Operator increase monitoring of the condition of the perimeter fencing and conduct any necessary repairs as soon as possible.</p>	<p>The Inglewood Oil Field is enclosed by fencing and gates compliant with the regulations cited in this provision. Both SPR and the ECC monitored the perimeter fencing on a regular basis to ensure the integrity of the fencing is maintained.</p>
71	22.310.050.U.1 (E.21.a) SA.12	<p>050.U.1: Equipment Removal. All facilities that have reached the end of their useful economic life shall be properly decommissioned and removed from the oil field within one year. Areas not slated for future use shall be restored and revegetated within 90 days of termination of use, unless such restoration and revegetation would interfere with fire safety or access to oil operations.</p> <p>SA.12: Clean-Up Plan. The CSD requires the operator to decommission and remove facilities that have reached the end of their useful economic life (County Code section 22.44.142.E.21.a) and submit to the County for its approval an unused or abandoned equipment removal plan (County Code section 22.44.142.L.14). The PXP has submitted such a plan in 2009 and shall periodically update the plan should additional equipment, not identified in PXP's original removal plan, become unused or abandoned. Equipment and materials not necessary to oil field operations as identified by the Director of Planning shall be promptly removed from view of Sensitive Developed Areas as addressed in the plan.</p>	<p>The equipment removal plan was reviewed February 2021 and submitted to DRP on 2/5/2021. No equipment became unused or abandoned since.</p>

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72	22.310.050.U.2 (E.21.b)	Equipment Maintenance. All equipment, improvements, facilities, and other personal property or fixtures located on the oil field shall be maintained in good condition to the satisfaction of the director and the director of public works.	Equipment at the oil field is inspected and maintained by the field operations staff with operators completing rounds of the facility daily.
73	22.310.050.U.3 (E.21.c)	Site Debris and Vegetation. The operator shall keep the property free of debris and vegetation overgrowth to the satisfaction of the director. All outside storage of parts or equipment shall comply with Part 7 of Chapter 22.52 of the County Code.	The Inglewood Oil Field is kept free of debris and vegetation overgrowth.
74	22.310.050.V (E.22)	Security. All unmanned entrances to the oil field shall be equipped with sliding gates which shall be kept closed at all times except when authorized vehicles are entering or leaving the oil field. The operator shall have a security guard on duty 24 hours per day.	All gates at the oil field are consistent with these regulations and all unmanned entrances are equipped with the required sliding type gates.
75	22.310.050.W (E.23)	Vehicle Parking. Vehicular parking shall comply with Part 11 of Chapter 22.52 of County Code.	All vehicle parking complies with the referenced code.
76	22.310.050.X.1 (E.24.a)	Sanitation. The operator shall comply with the following provisions: 1. Garbage and Refuse. The oil field shall be maintained in a clean, sanitary condition, free from accumulations of garbage, refuse, and other wastes.	The field is maintained in accordance with this provision. Garbage and refuse are picked up and removed weekly by a subcontractor garbage collection company.
77	22.310.050.X.2 (E.24.b)	Toilets and Wash Facilities. Sanitary toilet and washing facilities shall be installed at any site where personnel are permanently stationed. Portable facilities shall be provided wherever crews are temporarily employed. Such facilities shall be maintained in a clean and sanitary condition at all times.	Permanent toilet and wash facilities are located at the office building, the warehouse, the gas plant, the "halfway house" across from the gas plant, and at two modular buildings used by sub-contractors. The restroom facilities are maintained by a sub-contractor janitorial service. Portable facilities are located throughout the field and moved as needed, the portable restrooms are maintained by the subcontractor providing the units.
78	22.310.050.Y (E.25)	Storage of Hazardous Materials. The operator shall comply with all provisions of a hazardous materials business plan that has been submitted to the fire chief. The operator shall deliver to the fire chief for review and approval an updated hazardous material business plan on an annual basis. This plan shall provide the location of where hazardous materials are stored at the oil field. Hazardous materials shall be stored in an organized and orderly manner and identified as may be necessary to aid in preventing accidents, and shall be reasonably protected from sources of external corrosion or damage to the satisfaction of the fire chief.	The annual Hazardous Materials Business Plan was submitted to the LA County Fire Chief on 3/26/2020.
79	22.310.050.Z.1 (E.26.a)	CalGEM (formerly DOGGR) Regulations. All CalGEM (formerly DOGGR) regulations related to drilling, redrilling, and reworking operations.	Drilling, redrilling and reworking operations are in compliance with all applicable CalGEM (formerly DOGGR) regulations; however, no drilling or redrilling occurred in 2020.
80	22.310.050.Z.2 (E.26.b) SA 3	050.Z.2: Number of Drilling and Redrilling Rigs. No more than three drilling or redrilling rigs shall be present within the oil field at any one time. SA 3: Notwithstanding the CSD's allowance for operations of a maximum of three drill rigs at any one time on the Oil Field, the operator shall limit to two the number of drill rigs in use at any one time.	The approved 2020 Drilling Plan required per Section 050.Z.3 limits SPR to two drilling rigs, and no more than two drilling rigs have been - or plan to be - used at any one time on the Oil Field.

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#	CSD Section/ Plan	CSD Language	Compliance Description
81	22.310.050.Z.3 (E.26.c) SA 1	Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan. Before the end of each calendar year, the operator shall develop and deliver to the director an annual drilling, redrilling, well abandonment, and well pad restoration plan, which shall describe all drilling, redrilling, well abandonment, and well pad restoration activities that may be conducted during the upcoming calendar year. Drilling and redrilling shall be scheduled to avoid over concentration of such activities in that year in any one area if located near a developed area. The operator may at any time submit to the director proposed amendments to the then current annual plan. No drilling, redrilling, or abandonment activity may be commenced unless it is described in a current annual plan (or an amendment thereto) which has been approved by the director. The annual plan (and any amendments) shall be provided to the CAP for review and comment. All comments on the annual plan from the CAP shall be submitted to the director in writing, and, if timely submitted, will be considered as part of the director's review and approval. The director shall complete the review of the annual plan (and any amendments) within 45 days of receipt, and shall either approve the annual plan or provide the operator with a list of deficiencies. The annual plan shall comply with the provisions of this subsection, and shall include the following:...	The 2021 Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan was submitted to the County in 11/5/2020 and was approved on 12/30/2020.
82	22.310.050.Z.3 (E.26.c) SA 1	1. Slant Drilling. a. Deep Zone Wells. b. Mid-Zone Wells. c. Shallow Wells. d. Supplement Review. e. Definitions f. Environmental Consideration. g. Non-interference.	The 2021 Drilling Plan did not included any Deep zone or Mid zone wells that would be subject to a supplement review.
83	22.310.050.Z.4 (E.26.d)	Drill Rig Engines. All engines used for drilling and redrilling operations shall be operated by muffled internal-combustion engines or by electric motors.	No drilling or redrilling activities occurred in 2020.
84	22.310.050.Z.5 (E.26.e)	Fire Safety Regulations. All drilling, redrilling, and reworking shall be in conformance with applicable fire and safety regulations.	No drilling or redrilling activities occurred in 2020.
85	22.310.050.Z.6 (E.26.f) SA 6	050.Z.6: New Technology. Proven reasonable and feasible technological improvements which are capable of reducing the environmental impacts of drilling and redrilling shall be considered as they become, from time to time, available. SA 6: Clean Technology Assessment. The CSD requires the operator to consider proven reasonable and feasible technological improvements which are capable of reducing the environmental impacts of drilling and redrilling. (County Code section 22.44.142.E.26.f) The CSD also requires that the Annual Drilling Plan include a discussion of the latest equipment and techniques that are proposed for use as part of its drilling and redrilling program to reduce environmental impacts. (County Code section 22.44.142.E.26.c.ix) Pursuant thereto, the operator shall address in each Annual Drilling Plan the availability and feasibility of the use of natural gas-powered drill rigs or other technology capable of reducing environmental impacts, for the drilling of wells proposed in the Annual Drilling Plan (collectively " Clean Technology"). During the Periodic Review provided in 22.44.142 G.7, the County will evaluate such technology for brand new equipment that the operator intends to lease, acquire or otherwise use and require the operator to implement such technology to the extent the technology is feasible and available on a commercially reasonable basis.	SPR addresses this requirement with the submittal of the Annual Drilling Plan as required under CSD Provision 22.310.050.Z.6. The Equipment and Techniques to Reduce Environmental Impacts section of the 2020 Annual Drilling Plan provides a discussion on the latest equipment and technology that can reduce the environmental impacts of drilling activities. The discussion includes applicability of using electric rigs, coil tubing rigs, diesel-electric rigs, and natural gas-electric rigs along with the potential feasibility of their use at the Inglewood Oil Field.
86	22.310.050.Z.7 (E.26.g)	Derricks and Portable Masts. All derricks and portable masts used for drilling, redrilling, and reworking shall meet the standards and specifications of the American Petroleum Institute as they presently exist or as may be amended.	No drilling or redrilling activities occurred in 2020.

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#	CSD Section/ Plan	CSD Language	Compliance Description
87	22.310.050.Z.8 (E.26.h)	Equipment Removal. All drilling and redrilling equipment shall be removed from the site within 90 days following the completion of drilling or redrilling activities unless the equipment is to be used at the oil field within five days for drilling or redrilling operations.	No drilling or redrilling activities occurred in 2020.
88	22.310.050.Z.9 (E.26.i)	Drill Site Conditions. All drilling sites shall be maintained in a neat and orderly fashion.	No drilling or redrilling activities occurred in 2020.
89	22.310.050.Z.10 (E.26.j)	Belt Guards. Belt guards shall be required over all drive belts on drilling, redrilling, and reworking equipment. Guarding shall be as required by Title 8 of the California Code of Regulations, Section 6622, or as may be subsequently amended.	No drilling or redrilling activities occurred in 2020.
90	22.310.050.Z.3.i (E.26.c.x) 22.310.070.G (G.7) (2015)	050.Z.3.i: The annual plan shall include the following: A topographic vertical profile showing proposed location of new wells that reflects local terrain conditions and that addresses the potential visibility of existing and proposed wells and other production facilities from residential and recreation areas. 070.G (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section 070.G of CSD recommended that the consideration of "considering removing the subject figures/maps from the Annual Drilling Plan until the information is deemed useful for inclusion in future plans."	The 2021 Drilling Plan was submitted on 11/5/2020 and approved on 12/30/2020. There were no new wells drilled in 2020 nor are there currently any new wells proposed for 2021.
91	22.310.050.AA.1 (E.27.a)	Limits on Processing Operations. Unless otherwise expressly required by CalGEM (formerly DOGGR), the only processing operations permitted at the well site shall be the dehydration of oil and gas produced from the well; the storage, handling, recycling, and transportation of such materials; and those processing operations required for water injection purposes.	In 2020, the only processing that occurred at the oil field was associated with the dehydration of oil and gas; the storage, handling, recycling, and transportation of those materials; and water injection operations.
92	22.310.050.AA.2 (E.27.b)	Refining. No refining shall be conducted within the oil field.	In 2020, no refining occurred within the oil field.
93	22.310.050.AA.3 (E.27.c)	Well Pump Motors. All well pumping units shall be operated by electric motors.	In 2020, all well pump motors at the oil field were powered electrically.
94	22.310.050.AA.4 (E.27.d)	Well Pumps. Downhole submersible pumps and low-profile pumping units for production wells must be used wherever feasible.	In 2020, downhole submersible pumps and low-profile pumping units for production wells were used wherever feasible.
95	22.310.050.AA.5 (E.27.e)	Removal by Pipeline Only. All oil, gas, and other hydrocarbons produced from any well in the oil field shall be shipped and transported through pipelines, except in case of an emergency or when access to a pipeline becomes unavailable. Excluded from this requirement are propane and other related natural gas liquids that are in amounts in excess of what can be blended into the pipeline. Should any pipeline through which oil or gas is currently transported become unavailable for the safe transportation of said products due to maintenance problems with the pipeline, or lack of sufficient capacity within the pipeline to handle the volume of oil and gas needing transportation, or because the owner or operator of such pipeline elects to discontinue transporting oil or gas through such pipeline, then the operator shall within 180 days of the date the existing pipeline becomes unavailable, seek to acquire a private right of way or easement, or shall file an application for a right of way, easement, encroachment permit, or franchise for the construction of a replacement pipeline and shall diligently prosecute such application until such pipeline is completed. During any emergency situation, or during such time as any existing pipeline becomes unsafe or unavailable, oil and gas may be transported by truck until the emergency situation is resolved or until a replacement pipeline shall be permitted and constructed in compliance with all applicable laws and regulations.	In 2020, almost all oil, gas, and other hydrocarbons produced in the oil field were shipped and transported via pipelines, and all natural gas liquids were blended into the oil and transported by pipeline. During the emergency and reduction in operations in March of 2020, limited amounts of NGLs were transported by truck offsite.

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#	CSD Section/ Plan	CSD Language	Compliance Description
96	22.310.050.AA.6 (E.27.f)	Pipelines. The operator shall comply with the following provisions: a. New pipelines that remove oil or gas from the oil field shall be buried below the surface of the ground; b. All pipelines which are not enclosed within a fence shall be placed underground or covered with materials approved by the fire chief. Said covers shall be maintained in a neat, orderly, and secure manner; c. Any and all water or brine produced during pipeline construction shall either be injected in accordance with CalGEM (formerly DOGGR) requirements, or disposed of in accordance with other local, state or federal regulations; d. New pipeline corridors shall be consolidated with existing pipelines or electrical transmission corridors where feasible; and e. Upon completion of pipeline construction, the site shall be restored to the approximate previous grade and condition.	No new pipelines that transport oil or gas from the oil field have been constructed since the adoption of the CSD. The oil field is completely fenced in with chain link fencing that meets the CalGEM (formerly DOGGR) requirements, thus all oil field pipelines are also enclosed by a fence. All water or brine generated at the oil field is injected in accordance with CalGEM (formerly DOGGR) requirements. Pipeline construction within the oil field is consolidated to the maximum feasible in existing pipeline routes and corridors.
97	22.310.050.AA.7 (E.27.g)	Active Pipeline Plot Plan. The operator shall submit to the fire chief a plot plan depicting the approximate location of all active pipelines regulated by the United States Department of Transportation or California State Fire Marshall owned by the operator that are located outside the outer boundary line, including waste water, and trunk and gathering lines to transport oil or petroleum products. The plot plan shall be submitted within 30 days of the installation of any new pipelines or the relocation of an existing pipeline.	The active pipeline plot plan was submitted to the Fire Department on December 9, 2009 and has not been required to be updated to date. As of 3/31/18 SPR no longer operates or owns any DOT or CSFM pipelines associated with Inglewood.
98	22.310.050.AA.8 (E.27.h)	Machinery Enclosures. The operator shall maintain enclosures around machinery with moving parts consisting of a fence, screening, or housing. Said enclosures shall be installed in compliance with Section 11.16.020, Title 11 of the County Code.	In 2020, all enclosures around machinery subject to this provision were maintained in compliance with Section 11.16.020, Title 11 of the County Code.
99	22.310.050.AA.9 (E.27.i)	Opening Protections. The operator shall cap, close, or protect the openings in all oil wells, test holes, and similar excavation in compliance with Section 11.54.010, Title 11, of the County Code.	In 2020, all openings in all oil wells, test holes, and similar excavation in compliance were capped, closed, or protected in compliance with Section 11.54.010, Title 11, of the County Code.
100	22.310.050.BB.1 (E.28.a)	1. CalGEM (formerly DOGGR) Regulations. The operator shall comply with all CalGEM (formerly DOGGR) regulations related to well reworking operations.	In 2020, all CalGEM (formerly DOGGR) regulations related to well reworking operations were complied with.
101	22.310.050.BB.2 (E.28.b) 22.310.070.G (G.7) (2015)	050.BB.2: Number of Reworking Rigs. No more than eight reworking rigs shall be present within the oil field at any one time, unless an emergency condition requires additional Reworking rigs. This does not include equipment used for well maintenance or well abandonment. 070.G (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section 070.G of CSD recommended that "the Operator facilitate better coordination when scheduling reworking and the other types of rigs at the oil field to avoid concentrating too many rigs in one area.	In 2020, no more than four reworking rigs were present on the oil field at any one time not including equipment used for well maintenance and well abandonment. In 2020 SPR has ensured that reworking rigs are not overconcentrated in one area.
102	22.310.050.BB.3 (E.28.c)	Hours of Operation. With exception of emergencies, well reworking operations shall not be allowed after 7:00 p.m. or before 7:00 a.m., nor on Sundays or legal holidays.	In 2020, reworking rigs did not operate outside 7:00 am to 7:00 pm or on Sundays or legal holidays except in emergencies.
103	22.310.050.BB.4 (E.28.d)	Specifications. Reworking rigs shall meet the standards and specifications of the American Petroleum Institute.	In 2020, all reworking rigs met the standards and specifications of the American Petroleum Institute.
104	22.310.050.BB.5 (E.28.e)	Equipment Removal. Reworking rigs shall be removed from the oil field within seven days following the completion of reworking operations unless such rig will be used on another well at the oil field within five days.	In 2020, all reworking rigs were removed from the oil field within seven days following completion of the operations unless it was scheduled for use at another well within five days.



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#	CSD Section/ Plan	CSD Language	Compliance Description
105	22.310.050.CC.1 (E.29.a)	New Tank Specifications. All new tanks and appurtenances shall be designed, constructed, installed, and maintained in accordance with current County Fire Code, American Petroleum Institute, California Geologic Energy Management Division (CalGEM formerly DOGGR), California Division of Industrial Safety, Environmental Protection Agency Standards, applicable provisions of Title 14 of the California Code of Regulations section 177 4, and applicable CalARP Program requirements.	No new tanks were constructed in 2020.
106	22.310.050.CC.2 (E.29.b)	Setbacks. No new storage Tank, excluding a replacement tank, shall be constructed closer than 500 feet from any developed area, or closer than 200 feet from a public road. No building shall be constructed within 50 feet of any oil storage tank.	No new tanks were constructed in 2020. No new buildings were constructed within 50 feet of any oil storage tank in 2020.
107	22.310.050.CC.3 (E.29.c)	Vapor Recovery. Oil, wash, and produced water tanks shall be vapor tight and shall be equipped with a vapor recovery system.	In 2020, all oil, wash and produced water tanks were vapor tight and equipped with a vapor recovery system.
108	22.310.050.CC.4 (E.29.d)	Specifications for New Tank Piping, Valves, Fittings, and Connections. All new tank piping, valves, fittings, and connections including normal and emergency relief venting, shall be installed and maintained in accordance with current American Petroleum Institute standards to the satisfaction of SCAQMD and CalGEM (formerly DOGGR).	In 2020, all equipment covered by this provision were installed and maintained in accordance with current API standards to the satisfaction of SCAQMD and CalGEM (formerly DOGGR).
109	22.310.050.CC.5 (E.29.e)	Detection of Tank Bottom Leaks. The operator shall design, implement, and comply with a program, approved by the fire chief, for controlling and detecting tank bottom leaks on all tanks at the oil field. The operator may use a combination of methods including but not limited to diversion walls, dikes, tank foundations of concrete or gravel, and a tank bottom leak detection system in compliance with Title 14 of the California Code and Regulations section 1773, or subsequently enacted state regulations regarding tank bottom leaks.	All tanks at the Inglewood Oil Field have a program to detect tank bottom leaks as approved by the Fire Department on 2/18/10 in the Tank Leak Detection and Containment Plan.
110	22.310.050.DD (E.30)	Well and Production Reporting. The operator shall deliver annual production reports to the director and the fire chief. The reports shall provide the following information: 1. A copy of all CalGEM (formerly DOGGR) Forms 110 and 110B submitted during the previous 12 months. 2. Number and mapped location of wells drilled or redrilled, including well identification numbers. 3. Number and mapped location of water injection wells, including well identification numbers. 4. Number and mapped location of idled wells, including well identification numbers and the date each well was idled. 5. Number and mapped location of abandoned wells, including date each well was abandoned and/or re-abandoned. 6. Any additional information requested by the director or the fire chief.	The 2020 well and production reporting was submitted to the DRP and Fire Chief in March 2021.
111	22.310.050.EE (E.31)	Idle Well Testing and Maintenance. The operator shall comply with Title 14 of the California Code of Regulations section 1723.9 regarding testing and maintenance of idle wells, or subsequently enacted state regulations regarding testing and maintenance of idle wells. The operator shall carry out all additional tests, remedial operations, and mitigation measures required by CalGEM (formerly DOGGR) if any idle wells do not meet the test standards.	In 2020, all required testing and maintenance of idle wells was carried out in accordance with all applicable regulations.
112	22.310.050.FF (E.32)	Abandoned Well Testing. The operator shall conduct annual hydrocarbon vapor testing of areas within the oil field that contain abandoned wells. The testing shall be done using a soil gas vapor probe, or another method approved by the director. The results of the testing shall be submitted to the director and CalGEM (formerly DOGGR) on an annual basis. Abandoned wells that are found to be leaking hydrocarbons that could affect health and safety shall be reported to the director and CalGEM (formerly DOGGR) within 24 hours of the abandoned well test. If directed by CalGEM (formerly DOGGR), the operator shall re-abandon the well in accordance with CalGEM (formerly DOGGR) rules and regulations. If the test results for an abandoned well area are at or below the background levels for two consecutive years that area shall thereafter be tested every five years.	The 2019 Abandoned Well Testing Report was submitted to the DRP and CalGEM (formerly DOGGR) on 5/13/2020. The 2020 Abandoned Well Testing Report was submitted to the DRP and CalGEM on 12/14/2020.

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#	CSD Section/ Plan	CSD Language	Compliance Description
113	22.310.050.GG (E.33)	<p>Well and Well Pad Abandonment. If CalGEM (formerly DOGGR) orders the operator to plug and abandon any wells on the oil field, the operator shall deliver to the fire department, on a timely basis, all notices of intent to plug and abandon a well that the operator files with CalGEM (formerly DOGGR) and shall commence promptly and proceed diligently with the plugging and abandonment operations in accordance with CalGEM (formerly DOGGR) rules and regulations and the terms of the CalGEM (formerly DOGGR) permit to plug and abandon the well. Well abandonment may commence once all necessary permits and approvals are obtained. If the well pad associated with the abandoned well does not contain other production, injection, or idle wells, and will not be used for future drilling, then the operator shall promptly abandon the well pad consistent with the following provisions:</p> <ol style="list-style-type: none"> <li>1. Closure of Sumps. The operator shall clean out all sumps, cellars, and ditches, and level and fill all sumps and depressions pursuant to CalGEM (formerly DOGGR) requirements. If sumps are lined with concrete, bottoms and walls shall be broken up and removed. Sumps shall be closed in accordance with Regional Water Quality Control Board and California Department of Toxic Substances Control requirements.</li> <li>2. Well Pad Site Cleanup. The operator shall leave the site entirely free of oil, rotary mud, oil-soaked earth, asphalt, tar, concrete, litter, debris, and other substances to the satisfaction of CalGEM (formerly DOGGR) and in compliance with federal requirements.</li> <li>3. Contaminated Materials. All contaminated soils and materials within the well pad boundaries shall be removed and treated or disposed of in accordance with all local, county, State, and federal regulations.</li> <li>4. Well Pad Revegetation. The Well pad shall be revegetated following the requirement of the native habitat restoration plan.</li> </ol>	<p>CalGEM (formerly DOGGR) has not ordered any wells to be plugged or abandoned pursuant to this requirement. The oil field does not contain any sumps and sumps are no longer used at the oil field. Existing well pads have been cleaned up but are not scheduled for abandonment or restoration so they may be re-used to avoid the impact of developing new well pad areas.</p>
114	22.310.050.HH (E.34)	<p>County Request for Review of Well Status. The director may periodically review the status of the operator's wells and submit to CalGEM (formerly DOGGR) a list of wells the director believes should be plugged and abandoned as specified in Public Resources Code section 3206.5 or any subsequently enacted state law related to a local jurisdiction's right to request state-agency review of idle wells.</p>	<p>The County has not requested that CalGEM (formerly DOGGR) require the Operator to plug or abandon any wells pursuant to this provision.</p>
115	22.310.050.II (E.35) SA 14	<p>050.II: Reduced Throughput Triggering Review. When oil or gas throughput is less than 630 barrels per day, the director shall conduct a public hearing to determine if shut down of the oil field or other action are appropriate. SA 14: CSD Review Based On Reduced Production. When production drops to three percent of the estimated peak production of 21,000 barrels of oil per day, the County will review the CSD to consider whether modifications or closure of the Oil Field is necessary or appropriate or at such earlier date as the County determines appropriate.</p>	<p>The oil field has not reached the production levels that trigger this review and this provision has not been activated to date.</p>
116	22.310.050.JJ (E.36)	<p>Abandonment Procedures. Within 180 days of permanent facility shut down, the operator shall submit an abandonment plan to CalGEM (formerly DOGGR) and submit to the director for review and approval a time line for facility removal, site assessment, and remediation as necessary. The operator shall begin abandonment of the site no later than 20 days after the director's approval of the timeline, and shall provide to the director quarterly updates on the abandonment process until such time as the oil field is abandoned and remediated. The operator shall post a performance bond to insure compliance with all provisions of this subsection and the operators and landowners shall continue to pay property taxes at the rates assessed during oil field operation until all site restoration work has been fully completed, as determined by the director.</p>	<p>The facility has not shut down; hence, this provision is not applicable to date.</p>

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#	CSD Section/ Plan	CSD Language	Compliance Description
117	22.310.060.A.1,2 (F.1.a, b)	<p>Environmental Quality Assurance Program ("EQAP"). The operator shall comply with all provisions of an environmental quality assurance program that has been approved by the director. The following provisions relate to the EQAP:</p> <ol style="list-style-type: none"> <li>1. EQAP Requirements. The EQAP shall provide a detailed description of the steps the operator shall take to assure compliance with all provisions of this section, including but not limited to, all of the monitoring programs called for by this section.</li> <li>2. Annual EQAP Reports. Within 60 days following the end of each calendar year, the operator shall submit to the director an annual EQAP report that reviews the operator's compliance with the provisions of the EQAP over the previous year and addresses such other matters as may be requested by the director. The annual EQAP report shall include the following: <ol style="list-style-type: none"> <li>a. A complete list and description of any and all instances where the provisions of the EQAP, or any of the monitoring programs referred to therein or in this section, were not fully and timely complied with, and an analysis how compliance with such provisions can be improved over the coming year.</li> <li>b. Results and analyses of all data collection efforts conducted by the operator over the previous year pursuant to the provisions of this section.</li> </ol> </li> </ol>	This 2020 annual EQAP report was submitted on 03/16/2021.
118	22.310.060.A.3 (F.1.c)	<p>EQAP Updates. The EQAP shall be updated as necessary and submitted to the director for approval along with the annual EQAP report. The EOAP updates shall be provided to the CAP and MACC for review and comment. Comments from the CAP and MACC, if timely received, shall be considered by the director before making a decision to approve the same. The director shall complete the review of EQAP updates as soon as practicable, and shall either approve the updated EOAP or provide the operator with a list of specific items that must be included in the EOAP prior to approval. The operator shall respond to any request for additional information within 30 days of receiving such request from the director, unless extended by the director.</p>	The EQAP was approved by the County in February 2009 and was revised on August 25, 2009. No updates have been necessary to date.
119	22.310.060.B (F.2)	<p>Environmental Compliance Coordinator. The operator shall recommend and fund the environmental compliance coordinators. The number of environmental compliance coordinators shall be determined by the county and shall take into account the level of oil operations at the oil field. The environmental compliance coordinator(s) shall be approved by, and shall report to, the director. The responsibilities of the environmental compliance coordinator(s) shall be set forth in implementation guidelines that may be developed by the county for the oil field and shall generally include:</p> <ol style="list-style-type: none"> <li>1. On-site, day-to-day monitoring of construction or drilling and redrilling activities as determined by the director.</li> <li>2. Taking steps to ensure that the operator, and all employees, contractors, and other persons working in the oil field, have knowledge of, and are in compliance with all applicable provisions of this section.</li> <li>3. Evaluating the adequacy of drilling, redrilling, and construction impact mitigations, and proposing improvements to the operator or contractors and the county.</li> <li>4. Reporting responsibilities to the various county agencies with oversight responsibility at the oil field, as well as other agencies such as CalGEM (formerly DOGGR), and SCAQMD.</li> </ol>	An ECC position has been funded by the operator as required by this provision since the adoption of the CSD. The ECC site inspections are coordinated with oil field management to gain access to oil field staff, oil field contractors and for access to the oil field to check on the compliance provisions of the CSD. The ECC also participates in reviewing and commenting of all plans submitted by the Operator in compliance with the CSD.



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#	CSD Section/ Plan	CSD Language	Compliance Description
120	22.310.060.C.1 (F.3.a)	<p>Safety Inspection, Maintenance, and Quality Assurance Program ("SIMQAP"). The operator shall comply with all provisions of a safety inspection, maintenance, and quality assurance program that has been approved by the director and the fire chief.</p> <p>a. SIMQAP Requirements. The SIMQAP shall, at a minimum provide for:</p> <p>a. Inspection of construction techniques;</p> <p>b. Regular maintenance and safety inspections;</p> <p>c. Periodic safety audits;</p> <p>d. Corrosion monitoring and leak detection; and</p> <p>e. Inspections of all trucks carrying hazardous and/or flammable material prior to loading.</p>	<p>The SIMQAP was approved on 4/13/2011. The Revised SIMQAP was approved by LA County Fire Department on 6/8/2016, is implemented and ongoing. The next update is due in June 2021.</p>
121	22.310.060.C.2 (F.3.b)	<p>SIMQAP Updates. The operator shall periodically review and revise the SIMQAP to incorporate changes in procedures, and new safety and maintenance technologies and procedures. The operator shall make such revisions at least every five years, or more frequently, if the operator determines changes are necessary or if requested by the director or the fire chief. The operator shall submit SIMQAP updates to the director and the fire chief for their review and approval. The director shall complete the review of SIMQAP updates as soon as practicable, and shall either approve the updated SIMQAP or provide the operator with a list of specific items that must be included in the SIMQAP prior to approval. The operator shall respond to any request for additional information within 30 days of receiving such request from the director, unless extended by the director.</p>	<p>The SIMQAP was approved on 4/13/2011. The Revised SIMQAP was approved by LA County Fire Department on 6/8/2016, is implemented and ongoing. The next update is due in June 2021.</p>
122	22.310.060.C.3 (F.3.c)	<p>Worker Notification. The operator shall ensure that all persons working on the oil field comply with all provisions of the currently approved SIMQAP.</p>	<p>All persons working on the oil field in 2020 received SIMQAP training.</p>
123	22.310.060.C.4 (F.3.d)	<p>Inspections. The SIMQAP shall provide for involvement of county staff or the environmental compliance coordinator in all inspections required by this section.</p>	<p>The approved SIMQAP provides for the involvement of County staff or the ECC in all required inspections.</p>
124	22.310.060.D (F.4)	<p>Annual Emergency Response Drills of the County and Culver City Fire Departments. The operator shall demonstrate the effectiveness of the emergency response plan by responding to one planned emergency response drill per year which shall be conducted in conjunction with the county and Culver City fire departments. Emergency response drills required by other agencies that involve the county and Culver City fire departments can be used to satisfy this provision. In addition, the operator shall demonstrate the effectiveness of the emergency response plan by responding to not more than two unannounced drills each year which may be called by the county fire department at the oil field. If critical operations are then underway at the oil field, the operator need not respond to a unannounced drill to the extent such a response would, as a result of such critical operations, create an undue risk of personal injury or property damage, but in such case the operator must promptly explain the nature of the critical operations, why response is not possible, and when the critical operations will be completed.</p>	<p>The 2020 emergency response drill was conducted on September 29, 2020. Representatives from both LA County and Culver City Fire Departments attended. The County ECC and representatives from the California Department of Fish and Wildlife also attended and participated in the drill.</p>
125	22.310.060.E (F.5)	<p>Noise Monitoring. The public health department shall retain an independent qualified acoustical engineer to monitor ambient noise levels in the areas surrounding the oil field as determined necessary by the director or the director of public health. The monitoring shall be conducted unannounced and within a time frame specified by the director or the director of public health. Should noise from the oil operations exceed the noise thresholds specified in this section, no new drilling or redrilling permits shall be issued by the county until the operator in consultation with the director and director of public health identifies the source of the noise and the operator takes the steps necessary to assure compliance with thresholds specified in this section. The results of all such monitoring shall be promptly posted on the oil field web site and provided to the CAP.</p>	<p>No exceedances of the noise regulations in the County Code or of the noise limits specified subsection 050.E.1 (E.5.a) of the CSD have been reported to SPR by the DPH.</p>

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126	22.310.060.F (F.6)	Vibration Monitoring. The public health department shall retain an independent qualified acoustical engineer to monitor vibration in the areas surrounding the oil field as determined necessary by the director or the director of public health. The monitoring shall be conducted unannounced and within a time frame specified by the director or the director of public health. Should vibration from the oil operations exceed the vibration thresholds specified in this section, no new drilling or redrilling permits shall be issued by the county until the operator in consultation with the director and director of public health identifies the source of the vibration and the operator takes the steps necessary to assure compliance with thresholds specified in this section. The results of all such monitoring shall be promptly posted on the oil field web site and provided to the CAP. A telephone number by which persons may contact the operator at all times to register complaints regarding oil operations shall be posted in the main entrance sign to the facility and included in the annual newsletter required by subsections 100.B.2 and on the oil field web site required by subsection 100.B.3.	No exceedances of the vibration criteria specified in subsection 050.F (E.6) of the CSD have been reported to SPR by DPH.
127	22.310.060.G (F.7)	Complaints. All complaints related to oil operations received by the operator shall be reported on the same business day to the environmental compliance coordinator and to the director. In addition, the operator shall maintain a written log of all complaints and provide that log to the director, the MACC, and CAP on a quarterly basis. Depending upon the nature of the complaint, the operator shall report the complaint to the SCAQMD, CalGEM (formerly DOGGR), and any other appropriate agencies with oversight authority regarding the complaint at issue. If the complaint is received after normal business hours, it shall be reported to the environmental compliance coordinator and the agencies at the opening of the next business day.	All complaints received were reported to the ECC, DRP as well as other appropriate agencies with oversight of the matter in compliance with the timing of this policy. Quarterly complaint logs were submitted to the ECC and the DRP quarterly and are posted at <a href="http://www.inglewoodoilfield.com">www.inglewoodoilfield.com</a> .
128	22.310.070.A (G.1)	Costs of Implementing Monitoring and Enforcing Conditions. The operator shall be fully responsible for all reasonable costs and expenses incurred by the county or any county contractors, consultants, or employees, in implementing, monitoring, or enforcing this section, including but not limited to, costs for permitting, permit condition implementation, mitigation monitoring, reviewing and verifying information contained in reports, undertaking studies, research and inspections, administrative support, and including the fully burdened cost of time spent by county employees on such matters.	SPR has made timely payments on all CSD monitoring and enforcement costs to the County through the draw down account required by CSD Provision 070.B. All costs from the implementation of the CSD, permit processing, mitigation monitoring, compliance report research, review and verification, inspections, and administrative costs have been paid by the SPR from this account.
129	22.310.070.B (G.2)	Draw-Down Account. The operator shall maintain a draw-down account with the department of regional planning from which actual costs will be billed and deducted for the purpose of defraying the expenses involved in the county's review and verification of the information contained in any required reports and any other activities of the county, including but not limited to, enforcement, permitting, inspection, coordination of compliance monitoring, administrative support, technical studies, and the hiring of independent consultants. The initial amount to be deposited by the operator shall be \$500,000. In the first year, if withdrawals from the account have reduced its balance to less than 50 percent of the amount of the initial deposit (\$250,000), the operator shall deposit \$50,000 in supplemental funds within 30 business days of notification. After the first year, if the balance in the draw-down account is reduced at any time to \$50,000, the operator shall deposit \$50,000 in supplemental funds on each occasion that the account is reduced to \$50,000 or less within 30 business days of notification. There is no limit to the number of supplemental deposits that may be required. At the discretion of the operator, the amount of an initial or supplemental deposit may exceed the minimum amounts specified in this subsection. The director may, from time to time, increase the minimum \$50,000 figure to account for inflation or the county's experience in obtaining funds from the account.	The draw-down account has been maintained at or above the \$50,000 balance as required by this requirement. Deposits to the account in 2020 occurred on 4/7/2020 and on 11/19/2020.
130	22.310.070.C (G.3)	Indemnification. The operator shall enter into an agreement with the county to indemnify and hold harmless the county, its elected and appointed officials, agents, officers, and employees from any claim, action, or proceeding for damages arising from its oil operations, including water, air or soil contamination, health impacts, or loss of property value during the oil operations, well abandonment, and post-abandonment activities with terms approved by, and in a form acceptable to, the CEO.	The required agreement was documented in a letter signed by the operator and the County dated August 16, 2017, the agreement is on file with the County.

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131	22.310.070.H (G.4)	Insurance Requirements. Within 90 days following the effective date of the ordinance creating this section or such later time as may be approved by the director for good cause shown, and without limiting the operator's indemnification of the county as required in the preceding subsection, the operator shall provide evidence of insurance coverage that meets county requirements as required and approved by the CEO including identifying the county and its elected and appointed officers and employees as additional insureds. Such coverage shall be maintained so long as oil operations are conducted within the district and until such time as all abandonment requirements are met and certified by the appropriate local, state, and federal agencies. Such insurance coverage shall include but is not necessarily limited to the following: general liability, auto liability, professional liability, and environmental impairment liability coverage insuring clean-up costs and endorsing for 'Sudden and Accidental Contamination or Pollution. Such coverage shall be in an amount sufficient to meet all applicable state and federal requirements, with no special limitations. At the operator's request and only with county approval by the CEO, the operator may self-insure all or any part of the above coverage obligations in lieu of purchasing commercial coverage. These insurance requirements shall be in addition to all other indemnification, insurance and performance security required by federal, state, and local regulations and permits.	PXP, the operator at the time of CSD adoption, provided the County with an insurance policy meeting the liability and environmental impairment liability requirements of this provision on January 18, 2010. FM O&G updated this insurance to reflect the change in operator on June 25, 2013. SPR updated this insurance to reflect the change in operator on January 18, 2018.
132	22.310.070.E.1 (G.5.a)	Performance Bond. Prior to issuance of the first drilling or redrilling permit pursuant to this section, the operator shall provide to the department of regional planning a faithful performance bond or financial instrument in the sum to be determined by the CEO, payable to the county and executed by a corporate surety acceptable to the county and licensed to transact business as a surety in the state of California. Such bond shall be conditioned upon the faithful performance by the operator of duties related to well abandonment, site restoration, and environmental cleanup and shall be in a format and include terms approved by the CEO.	SPR obtained Performance Bond No. B010359 for the benefit of Baldwin Hills Community Standards District of the County of Los Angeles, as Obligee with the Executed Date of December 14, 2016 and Effective Date of Change of November 3, 2017.
133	22.310.070.E.2 (G.5.b)	Change of Operator. The performance bond shall continue in force for one year following any sale, transfer, assignment, or other change of operator of the oil field, or of the current operator's termination of activities at the oil field. The county may release said bond prior to the end of the one-year period upon satisfaction by the operator of all its obligations. Notwithstanding the foregoing, the performance bond shall not be terminated or released upon the sale, transfer, assignment, or other change of operator until the new operator has delivered a replacement bond complying with the provisions of this subsection G.	It is SPR's understanding that this bond is based upon anticipated end of life remaining liabilities that may be present. This bond exceeds the liability of remediation cost analyses and should be adequate to provide the necessary coverage.
134	22.310.070.E.3 (G.5.c)	Funding Options. At its sole option, the county may accept certificates of deposit, cash deposits, or U.S. government securities in lieu of commercial bonds to meet the above bonding requirements on terms approved by the CEO.	This provision is not applicable since SPR provided a performance bond in accordance with G.5.a.
135	22.310.070.F (G.6)	Other Obligations. The insurance, indemnification, and performance security requirements in subsections 070.C, 070.D, and 070.E shall be in addition to all other indemnification, insurance, and performance security required by federal, state and local regulations, and permits.	The condition is administrative in its intent and is fully implemented.

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136	22.310.070.G (G.7)	<p>Periodic Review. The county shall conduct a comprehensive review of the provisions of this section at least every five years to determine if the provisions of this section are adequately protecting the health, safety, and general welfare. Such reviews shall, among other things, consider whether additional provisions should be added, appended, or removed. One of the main goals of the periodic review shall be to evaluate if proven technological advances that would further reduce impacts of oil operations on neighboring land uses should be incorporated into the provisions of this section.</p> <p>1. Review Requirements. Each review shall include a report by a hearing officer designated by the director, which shall be prepared after public notice and an opportunity for public comment. The report shall include a comprehensive analysis of the effectiveness of this section, and shall review and consider enforcement activity, operational records, and any other issues relating to oil operations. The report, at the option of the county, may include a survey of residents near the oil field regarding noise, odors, vibrations, and other issues requested by the director of public health. A draft of the report shall be provided to the CAP and the operator for review and comment. All comments on the draft report from the CAP and the operator shall be submitted to the hearing officer in writing, and will be considered, if timely received, before the report is finalized. The final report by the hearing officer shall include a recommendation as to whether the director should prepare proposed amendment to this section for submission to the board of supervisors.</p> <p>2. Early Reviews. At the discretion of the director, reviews of this section may be conducted more frequently than every five years. Without limiting such discretion, the director shall consider whether an early review should be undertaken if more than three material violations occur within any 12-month period.</p> <p>3. Initial Review. The initial review shall occur no sooner than three years and no later than five years after the effective date of the ordinance establishing this section unless the director determines that such initial annual review shall occur at an earlier time pursuant to subsection b, above.</p>	<p>The County released a five year review report in February 2014. The draft report was circulated for review and comment to both the CAP, members of the public, other agencies and the operator. Comments on the draft report were considered in the preparation of the administrative final draft released on 06/25/15. The administrative final draft was discussed at the July 2015 CAP meeting, and on 09/24/15, the final draft was issued. The report was prepared consistent with the five year time frame requirement stipulated in CSD Provision G.7.c. On 10/28/15, Los Angeles County DRP issued a letter to FM O&amp;G verifying the conclusion of the Periodic Review Final Report dated September 2015 that the provisions of the CSD have been effective and that no modification to the current language of the CSD is recommended. Additionally, DRP is conducting the second Periodic Review of the BHCS. The Periodic Review is designed to ensure that the BHCS regulations are effective and proactive in protecting the health, safety, and general welfare of the community surrounding the Inglewood Oil Field. Community stakeholder participation in this process is also encouraged through written comments on the public draft as well as in person during the public hearing. More information regarding this Periodic Review process may be found at <a href="http://planning.lacounty.gov/baldwinhills/review2">planning.lacounty.gov/baldwinhills/review2</a>. Forecast completion of the 2019 review is by the summer of 2021.</p>
137	22.310.070.H (G.8)	<p>Multiple Agency Coordination Committee ("MACC"). A MACC shall be established to coordinate activities and communications between the various agencies with regulatory authority over the oil operations within the district. While each agency will continue to make its own decisions with regard to their respective areas of authority, the MACC will allow for collection and analysis of data and for discussion of both strategic evaluations and enforcement actions taken by the various agencies at the oil field.</p> <p>1. MACC Members. The director shall establish a MACC that includes representatives from the following agencies: the county department of regional planning, the county fire department, the county department of public works, and the county department of public health. The SCAQMD, the Regional Water Quality Control Board, CalGEM (formerly DOGGR), and Culver City fire department shall be invited to appoint a representative from their agency as a member of the MACC.</p> <p>2. MACC Chair. The director or his designee shall chair the MACC meetings and shall coordinate all MACC activities including scheduling and keeping minutes of MACC meetings.</p> <p>3. MACC Meetings. The MACC shall determine its meeting schedule.</p> <p>4. Documents Provided to the MACC. Copies of all monitoring and compliance reports, plans, and other documents that are requirements of this section shall be submitted to the MACC.</p>	<p>A MACC was established in 2009, and the MACC conducts periodic meetings. All monitoring and compliance reports are provided to the MACC.</p>
138	22.310.070.I (G.9)	<p>Related County Code Provisions. The county code contains a number of provisions related to oil wells and oil field operations. Where the regulations of this section differ from any other provisions in the county code, these regulations shall supersede unless the contrary provisions are mandated by state law.</p>	<p>The provision is a standard County requirement to clarify jurisdiction on similar code and regulations.</p>

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139	22.310.080.A (H.1) SA 4	<p>080.A: Director's Review Required. The operator shall apply for and receive approval of a director's review pursuant to the provisions of Part 12 of Chapter 22.56 prior to any new drilling and re-drilling. New drilling and re-drilling approved through a director's review procedure shall be limited to no more than 53 wells per year, with the maximum number of newly drilled wells of that total, limited to 45 per year, except that during the first year following the effective date of the ordinance establishing this section, new drilling and re-drilling shall be limited to no more than 24 wells. Approval through director's review for drilling new wells shall be limited to 600 wells over 20 years, beginning on the effective date of this ordinance. Drilling and re-drilling shall be planned to avoid over concentration of such activities in one area in any one year, if near developed areas. The director's review procedures shall also apply to emergency actions determined by the director as necessary to prevent an imminent hazard, or to other immediate measures required for the purposes of protecting health and safety. No new permits for drilling or re-drilling shall be approved by the director unless the subject wells have been approved as part of an annual drilling plan as described in subsection 050.Z.3. Approval shall not be granted until copies of all related permits have been submitted to the director; other permits include, but are not limited to, the permits required by CalGEM (formerly DOGGR), the county fire department; the county department of public works, the county sanitation district, RWQCB, SCAQMD, and other pertinent agencies identified by the director.</p>	No new drilling or re-drilling occurred in 2020.																														
140	22.310.080.A (H.1) SA 4	<p>SA 4: Number of wells. Notwithstanding the aggregate and annual well-drilling limits in the CSD, the operator shall comply with the following limits:</p> <p>a. Notwithstanding Section 22.44.142.H of the CSD, no more than 500 new wells (inclusive of Bonus Wells and wells drilled since approval of CSD) shall be drilled pursuant to the CSD (hereinafter "Director's Review") through October 1, 2028, or during the remaining life of the CSD, whichever is later.</p> <p>b. Until such time as the operator has drilled or re-drilled 50 wells since the adoption of the CSD, or 24 months from the date of this Agreement, whichever is sooner ("Time Period One"), no more than 30 wells may be drilled or re-drilled in any calendar year pursuant to a Director's Review as set forth in the CSD (hereinafter Director's Review). At the end of Time Period One, and if the County determines, pursuant to its review of the CSD by the Director of Regional Planning, that the CSD has been effective in protecting the health, safety, and general welfare of the public, thereafter (the "Full Operational Period") no more than 35 wells may be drilled or re-drilled in the calendar year pursuant to Director's Review.</p> <p>c. In Time Period One, for each well abandoned within 800 feet of any Developed Area (the "800-foot zone") by PXP since adoption of the CSD and in full compliance with the California Geologic Energy Management Division ("CalGEM" formerly "DOGGR") standards for abandonment at the time of abandonment, the operator may drill two additional new wells outside of the 800-foot zone (hereinafter "Bonus Wells"), up to a maximum of 45 drilled and re-drilled wells (30 wells plus 15 Bonus Wells) in any calendar year within Time Period One pursuant to Director's Review and subject to review and approval in the Annual Drilling Plan. Subject to the annual and aggregate limits on number of wells, Bonus Wells earned by abandonment may be drilled at any time during the life of the CSD.</p> <p>d. In the Full Operational Period, for each well abandoned within the 800-foot zone, the operator may drill two additional new wells outside the 800-foot zone up to a maximum of 53 drilled and re-drilled wells (35 wells plus 18 Bonus Wells) in that year pursuant to Director's Review and subject to review and approval in the Annual Drilling Plan. Subject to the aggregate and annual limits on number of wells, Bonus Wells earned by abandonment may be drilled at any time during the life of the CSD.</p> <p>e. The Developed Area as used in the CSD with respect to the 400-foot buffer zone (Section 22.44.142.E.) shall remain unchanged (static or fixed) from what it was determined to be on the effective date of the CSD.</p>	<p>Since inception of the CSD and following the installation of 50 new wells, the Settlement Agreement allows SPR to apply to the County for approval to install up to 35 new wells per year. SPR's predecessor applied for this well increase on 10/10/2011 and was granted approval by the County on 12/12/2011.</p> <p>Since inception of the CSD through 6/30/2014, 127 wells have been drilled and 32 wells have been abandoned; of which 20 were within 800 feet of Developed Areas.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="3" style="text-align: left;"><b>Number of Wells Drilled Since Inception of the CSD</b></th> </tr> <tr> <th style="text-align: left;">YEAR</th> <th style="text-align: center;">NUMBER OF WELLS</th> <th style="text-align: center;">BONUS WELLS USED</th> </tr> </thead> <tbody> <tr> <td>2009</td> <td style="text-align: center;">0</td> <td style="text-align: center;">0</td> </tr> <tr> <td>2010</td> <td style="text-align: center;">19</td> <td style="text-align: center;">0</td> </tr> <tr> <td>2011</td> <td style="text-align: center;">40</td> <td style="text-align: center;">5</td> </tr> <tr> <td>2012</td> <td style="text-align: center;">20</td> <td style="text-align: center;">0</td> </tr> <tr> <td>2013</td> <td style="text-align: center;">30</td> <td style="text-align: center;">0</td> </tr> <tr> <td>2014</td> <td style="text-align: center;">18</td> <td style="text-align: center;">0</td> </tr> <tr> <td>2015-20</td> <td style="text-align: center;">0</td> <td style="text-align: center;">0</td> </tr> <tr> <td><b>Total</b></td> <td style="text-align: center;"><b>127</b></td> <td style="text-align: center;"><b>5</b></td> </tr> </tbody> </table>	<b>Number of Wells Drilled Since Inception of the CSD</b>			YEAR	NUMBER OF WELLS	BONUS WELLS USED	2009	0	0	2010	19	0	2011	40	5	2012	20	0	2013	30	0	2014	18	0	2015-20	0	0	<b>Total</b>	<b>127</b>	<b>5</b>
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141	22.310.080.B-C (H.2 - 3)	<p>080.B: Conditional Use Permit Required. Provided a conditional use permit has first been obtained as provided in Part 1 of Chapter 22.56, and while such permit is in full force and effect in conformity with the conditions of such permit, the following uses may be established:</p> <ol style="list-style-type: none"> <li>1. Drilling or redrilling that exceeds the maximum number allowed pursuant to a director's Review;</li> <li>2. Steam drive plant; and</li> <li>3. New tanks with a capacity of greater than 5,000 barrels.</li> </ol> <p>080.C: Conditional Use Permit Requirements. For those uses requiring a conditional use permit, in addition to the requirements of Part 1 of Chapter 22.56, the applicant shall substantiate to the satisfaction of the hearing officer that:</p> <ol style="list-style-type: none"> <li>1. The requested use is in compliance with the provisions of this section; and</li> <li>2. All reasonable measures were taken to reduce and minimize potential impacts from the proposed operation.</li> </ol>	No conditional use permits have been applied for/obtained.
142	22.310.080.D (H.4)	Application Where Violation Exists. No application required pursuant to this section shall be accepted for processing or approved where any existing use in the district is being maintained or operated by the operator or its agents in violation of any material provision of this title.	No violations were issued in 2020.
143	22.310.090.A (1.1)	<p>Civil Penalties and Performance Security. The operator shall be subject to a penalty for violation of any requirement of this section as determined by, and at the discretion of, the director in an amount not less than \$1,000 or more than \$1 0,000 per day per violation, but in no event, in an amount beyond that authorized by state law. For this purpose, the operator shall deposit the sum of \$100,000 in an interest-bearing trust fund with the department of regional planning within 30 days following the effective date of this section, to establish a draw-down account. A written notice of violation and the associated penalty will be sent to the operator in the event of a violation. If the noted violation is not corrected to the satisfaction of the director within the time period set forth in the notice of violation, the penalty amount cited in the notice of violation will be deducted from the account. If the violation is corrected within the time period set forth in the notice of violation, but recurs any time within a six-month period, the penalty will be deducted from the account upon each recurrence and the operator will be notified of such deduction. Once the deposit has been depleted by 50 percent of the initial amount (\$50,000), the operator shall deposit additional funds sufficient to bring the balance up to the amount of the initial deposit (\$1 00,000) within 10 business days of notification. There is no limit to the number of supplemental deposits that may be required while the operator conducts oil operations within the district. If the operator is dissatisfied with the action of the director, the operator may file an appeal with the hearing officer within 15 days after the date which notice is mailed. Upon receiving a notice of appeal, the hearing officer shall take one of the following actions.</p> <ol style="list-style-type: none"> <li>1. Affirm the action of the director;</li> <li>2. Refer the matter back to the director for further review with or without instructions; or</li> <li>3. Set the matter for public hearing and after hearing, affirm, modify, or reverse the action of the director.</li> </ol> <p>The decision of the hearing officer shall be final.</p>	On 12/23/08, \$100,000 was deposited with the County in the interest-bearing trust fund required by this provision. SPR was not subject to any fees described in this provision; hence, the balance of this account has not changed with the exception of interest accumulation.
144	22.310.090.B (1.2)	Access to Records and Facilities. As to any condition which requires for its effective enforcement the inspection of records or facilities by the county or its agents, the operator shall make such records available or provide access to such facilities upon reasonable notice from the county. The county agrees to keep such information confidential where required or permitted by law and requested by the operator in writing.	SPR has made records and facilities available for inspection by the County and its agents.



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145	22.310.090.C (I.3)	Right of Entry. Any officer or employee of the county of Los Angeles, or his or her duly appointed representative, whose duties require the inspection of the oil field premises shall have the right and privilege at all reasonable times, to enter upon any premises upon or from which any oil operations are being conducted for which any permit is required under this section, for the purpose of making any of the inspections pursuant to this section, or in any other ordinance of the county, or for any other lawful purpose, but for safety reasons, shall be accompanied by the operator or a designee of the operator and shall wear all appropriate personal protection equipment in accordance with the operator's established health and safety policies.	SPR has made the oil field open to authorized inspection.
146	22.310.100.A (J.1)	Community Advisory Panel ("CAP"). A community advisory panel shall be established by the director to foster communication about ongoing operations at the oil field and to allow the community representatives to provide input to the county and the operator. 1. CAP Members. The CAP may include representatives of the county, the city of Los Angeles, the city of Culver City, West Los Angeles College, the operator, the landowners, and each of the major neighborhoods surrounding the oil field (including Ladera Heights, Windsor Hills, Oak Park, View Park, Culver Crest, Blair Hills, and Raintree). The operator and each of the governmental entities previously referred to may each designate a representative to the CAP. Each landowner and neighborhood organization of the surrounding communities may submit a nomination to the director for appointment to the CAP. Where there is no neighborhood organization, a community resident may make a request to the director to be appointed to the CAP. School districts with schools in the vicinity of the oil field and the lessors may make a request to the director to have a representative appointed to the CAP. 2. CAP Meetings. The CAP shall determine its meeting schedule. 3. Documents Provided to the CAP. A notice of availability of all monitoring and compliance reports and results, all plans, audits and studies, and any other available documents that are required by this section shall be submitted to the CAP promptly after they are prepared or otherwise available. Copies of these reports, documents, and other items shall be provided to CAP members upon request except to the extent information therein may not be legally disclosed. Prior to each CAP meeting, the county shall provide to the CAP a list of all violations of the provisions of this section that have occurred since the last CAP meeting.	Documentation made available to the CAP is posted on the Inglewood Oil Field website required/described in 100.B.3 (J.2.c).
147	22.310.100.B.1 (J.2.a) 22.310.070.G (G.7) (2015)	100.B.1: Community Meetings. The operator shall hold community meetings on an annual basis to provide updates on oil operations. 070.G (2015): The Final 2015 Periodic Review Final Report prepared by the County pursuant to Section 070.G of CSD recommended that "agendas for future Community Meetings be specific to oil field operations and issues and that measures be implemented to ensure questions from the public are addressed appropriately.	The 2020 annual community meeting was held via Zoom meeting (due to COVID-19) this year, was held on Saturday, 10/17/2020, and in accordance with the 070.G (2015) recommendation. The agenda was specific to oil field operations and SPR ensured that questions from the public were addressed appropriately.
148	22.310.100.B.2 (J.2.b)	Newsletter. The Operator shall publish an informational newsletter annually, which shall contain updated information on oil operations including drilling, redrilling, maintenance, repair, and reworking activities and all recently granted conditional use permits or applications filed for conditional use permits for the oil field. The newsletter shall be mailed by the operator to all owners of property located within 1,000 feet of the outer boundary line; all owners of property within 1,000 feet of the perimeter of the district as shown in the records of the county assessor's office; to any person or entity who has filed a written request therefore with the director; and to neighboring cities. The operator shall also make these newsletters available on the oil field web site. The oil field web site address shall be publicized in each newsletter.	The newsletter was mailed out and posted on www.inglewoodoilfield.com on 9/17/2020.

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2020 Environmental Quality Assurance Program (EQAP) Report**

#	CSD Section/ Plan	CSD Language	Compliance Description
149	22.310.100.B.3 (J.2.c)	Oil Field Web Site. The operator shall maintain and update on a regular basis an oil field web site that shall include information on oil operations at the oil field, including drilling and production activities. All monitoring and compliance reports and results, plans, audits and studies, and any other available documents that are required by this section (except to the extent they contain information that may not legally be disclosed) shall be promptly posted on the Oil Field Web Site in pdf format.	SPR maintains the www.inglewoodoilfield.com website, which includes information on the history and future of the oil field, oil field operations, operational plans, compliance plans, community and environmental sections, and information on the CSD. The web site contains over 250 documents related to operational and compliance information with the documentation posted in pdf format as required by this policy. The web site also provides contact information and includes an interactive email system to allow for direct input to SPR and for registering for email updates on oil field activities.
150	22.310.100.C (J.3)	Ombudsperson. The operator shall designate employees or authorized agents to serve as ombudspersons to respond to questions and concerns concerning the oil operations. Each ombudsperson shall be familiar with all the provisions of this section and all conditions of approval related to permits and approvals issued by the county or the State of California. It shall be the further responsibility of the ombudsperson to facilitate, to the extent feasible, the prompt resolution of any issues that may arise relating to the above-stated matters or the impacts of the oil operations. The name, title, email address, and telephone number of the ombudsperson shall be posted on the oil field web site, prominently displayed in the newsletter, distributed twice per year to the CAP and MACC, and provided to any other persons requesting such information. An ombudsperson shall be available at all times, and shall respond within one hour after an initial call. An ombudsperson shall also meet at reasonable times with interested parties in an attempt to resolve issues related to oil operations. An ombudsperson shall have authority to initiate a response on behalf of the operator in all foreseeable matters. The operator shall be required to maintain a written log of all calls to the ombudspersons registering complaints or concerns regarding oil operations or other matters. The log shall include the complainant's name, date, time, phone number, nature of complaint, and the response or resolution offered. A copy of the log shall be provided to the director, the MACC, and the CAP on a quarterly basis.	The ombudsperson system has been in place since the adoption of the CSD and serves as primary contact between SPR and the community. The ombudsperson contact information is included in the annual newsletters and in the agendas for CAP meetings. In addition to the ombudsperson, the oil field maintains four staff members on an on-call basis to coordinate and respond to calls from the public or regulatory agencies regarding oil field operations. SPR maintains a complaint log summarizing all calls made to the ombudsperson as required by this policy.
151	Section 22.310.110 (K)	Modification of Development Standards.	No modifications to development standards has been applied for.
152	Section 22.310.120 (L)	Implementation Provisions. This subsection identifies the various implementation plans and other requirements for initial compliance with this CSD and the time frames therefor. Except as identified below, the provisions of this section shall be complied with on the effective date of the ordinance establishing this CSD. As used in this subsection, "effective date" shall mean 30 days after the board of supervisors adopts the ordinance establishing this CSD. As soon as possible after the effective date, the department of regional planning shall develop an overall implementation plan specifying the required contents or measures for each of the plans set forth below, including the inclusion of those appropriate mitigation measures indicated as necessary by the Final Environmental Impact Report for the Baldwin Hills Community Standards District to reduce environmental impacts to less than significant levels in cases where impacts can be so reduced.	This subsection of the CSD lists the various implementation plans and other stipulations required for initial compliance along with a submittal schedule for the subject compliance. The schedule requirements for the plan and compliance submittals required under this provision range from 30 days to two years following the effective date of the CSD (October 28, 2008). All plans and initial requirements of this CSD subsection were completed; therefore, this requirement is no longer applicable.



**Inglewood Oil Field  
2020 Environmental Quality Assurance Program (EQAP) Report**

#	CSD Section/ Plan	CSD Language	Compliance Description
153	SA 5	<p>Health Assessment and Environmental Justice Study. The County shall complete a Community Health Assessment of the communities surrounding the Oil Field which shall include an Environmental Justice component by June 2012 and ensure additional assessments are completed every five to seven years throughout the life of the CSD. In future Community Health Assessments, the County Department of Public Health ("Public Health") shall review other agencies' reports regarding air quality, water quality and seismic data, where feasible, in its assessment. Public Health will analyze the information by socio-economic and demographic data to accommodate and reflect an Environmental Justice component. The Community Health Assessment shall include, but not be limited to, an analysis of cancer rates, mortality rates, birth outcomes and a survey of other pertinent health indicators. The County will consult with the CAP and the Health Working Group regarding the Community Health Assessment and consider reasonable comments by the CAP and the Health Working Group. Public Health will comply with all applicable state and federal requirements including Title VI of the Civil Rights Act of 1964 and corresponding regulations, and California Government Code Section 11135 and corresponding regulations.</p>	<p>The Department of Public Health (DPH) completed the first study in May 2012 ahead of the Settlement Agreement deadline of June 2012. The study was made available to the public on the DRP website and was presented to the CAP on July 26, 2012. The Health Assessment and Environmental Justice Study term of the Settlement Agreement required a second study to be completed by June 2019, however, the DPH presented a different approach and schedule in a letter dated May 28, 2019 to all parties of the Settlement Agreement. The letter acknowledged that the first study was unable to determine whether exposures to chemicals from the oil field activities at the Inglewood Oil Field directly affected health outcomes among individuals living nearby. The letter further details a three-phase approach, as developed by DPH in consultation with the CAP, for a different study approach aligned to occur concurrent with the CARB SNAPS Study. No complete due date is forecasted, but will likely be in the summer of 2022.</p>
154	SA 7	<p>Electrical Distribution Study. The County will propose to Southern California Edison ("SCE") and the Los Angeles Department of Water and Power ("DWP") that a study be conducted in cooperation with SCE, DWP, the County and the operator regarding opportunities to streamline and consolidate electrical lines distributed throughout the Oil Field and that SCE and DWP each fund one-fourth of the cost of such study. The operator will fund one-fourth of the cost of any such study. The County will fund one-fourth of the cost of any such study.</p>	<p>This is a County action, and it was reported that both SCE and DWP declined to participate with respect to funding the study and the County is exploring other funding options.</p>
155	SA 8	<p>Air Quality Monitoring. Supplemental to the air monitoring required by the CSD, the County will develop and implement an air quality monitoring plan that takes into consideration review and comments from Petitioners, interested stakeholders and the public. Such air monitoring shall be designed to assess the risk of both acute and chronic exposure to air contaminants from Oil Field operations, and endeavor to determine and distinguish the source of emissions, to the extent feasible, using available and affordable monitoring technology. Such air monitoring may be performed by SCAQMD, or an independent qualified consultant selected by County, and shall be commenced within 12 months of the date of this Agreement. The protocol for the air monitoring plan shall be peer reviewed prior to commencement. The plan shall be completed, and a peer reviewed report issued, within 12 to 24 months after commencement. The County commits to spending up to \$250,000 of its own funds toward implementing the plan and shall use reasonable efforts to seek additional funding sources, if necessary, to implement the plan. The operator shall reasonably cooperate with SCAQMD, the County and/or the independent consultant regarding any and all air monitoring related to the Oil Field.</p>	<p>This is a County action that was completed in February 2015. The report is available to the public on the County's Baldwin Hills Community Standards District website.</p>
156	SA 9	<p>Back-Up Flare. The CSD (County Code section 22.44.142.L.5.b) allows the operator to maintain its existing gas plant flare as back-up equipment at the facility's gas plant after a new flare is permitted and installed. The operator and the County agree that this provision of the CSD allows only one gas plant flare to be operated at one time at the Oil Field. The operator shall comply with said limitation of only one gas plant flare operating at one time at the Oil Field. The operator shall install and have operational the new flare within 180 days of receiving the SCAQMD permit or at such later date as approved by the Director of Regional Planning for good cause shown.</p>	<p>Installation of the new gas plant back-up flare was completed in 2012. The old gas plant flare remains and is maintained as a back-up as allowed for by CSD Provision 22.310.120.E.2 and the Settlement Agreement. SPR has complied with the requirement that only one flare be in operation at one time at the oil field.</p>
157	SA 10	<p>Well Plugs. CalGEM (formerly DOGGR) requires oil field operators to utilize a minimum 25-foot cement surface plug at the top of a well when abandoning any such well pursuant to Title 14 of the California Code of Regulations section 1723.5. To augment this requirement, for all wells abandoned at the Oil Field from the date of this Agreement, the operator shall utilize a total of 150-foot cement surface plug.</p>	<p>SPR complies with the 150-foot cement plug requirement for abandoned wells as verified by CalGEM via well abandonment plan approvals and inspections.</p>

**Inglewood Oil Field  
2020 Environmental Quality Assurance Program (EQAP) Report**

#	CSD Section/ Plan	CSD Language	Compliance Description
158	SA 13	<p>Fracking Study. The operator shall pay for an independent consultant to conduct a study of the feasibility and potential impacts (including impacts to groundwater and subsidence) of the types of fracturing operations the operator may conduct in the Oil Field. The study will also consider the operator's historic and current use of gravel packing. Such study will be completed within twelve (12) months of the date of this Agreement. Such study and all the back-up information for such study shall be provided to a qualified peer reviewer selected by the County and the operator, who shall review the study, back-up materials, and conclusions for completeness and accuracy. The operator must provide the independent expert with all materials requested and reasonably necessary for an accurate and verifiable study. The peer reviewer will be provided with access to all the data and materials provided to the independent expert. The peer reviewer shall agree to keep all proprietary information confidential. If the peer reviewer determines that the study is materially inadequate, incomplete or inaccurate, it shall so advise the operator's consultant who will complete the study as reasonably recommended by the peer reviewer and provide the revised study to the peer reviewer within 90 days. Upon acceptance by the peer reviewer, the study and all supporting material, including comments by the peer reviewer, shall be forwarded to the County, CalGEM (formerly DOGGR), the Regional Water Quality Control Board ("RWQCB"), CAP and Petitioners and be available to the public, with any proprietary information redacted.</p>	<p>The Hydraulic Fracturing Study – Inglewood Oil Field was completed in July 2012 with the final report dated October 10, 2012 consistent with the requirements of the Settlement Agreement. The report is available to the public on the Inglewood Oil Field web site.</p>
159	SA 15	<p>CSD Provisions. The CSD and all of its standards and requirements remain in full force and effect except to the extent that the operator has agreed to be limited by stricter or more rigorous controls or standards as reflected in this Agreement. Nothing herein shall limit or abrogate the County's discretion in amending the CSD, or other action pursuant to the County's legislative or police powers, to impose more restrictive requirements. This Agreement neither establishes nor abrogates any vested rights to drill new wells in the Oil Field. The County will provide written guidance on the additional limits and controls regarding operation of the Oil Field which are required by this Agreement to County staff and departments responsible for implementing the CSD and enforcing the CSD, and any other personnel the County deems necessary. The County shall recirculate this written guidance on an annual basis.</p>	<p>The requirements of the CSD and the Settlement Agreement remain in full effect. Pursuant to CSD Provision 22.310.070.G, Periodic Review, the compliance review was completed by the County in 2015 with the Periodic Review Final Report dated September 2015. Results of the Periodic Review document the oil field is being operated in compliance with all provisions of the CSD and the Settlement Agreement. CSD Provision 22.310.070.G requires that the Periodic Review process be initiated every five years and the second review, covering the compliance years 2014 through 2018, was initiated in October 2018 with a draft report released in September 2019.</p>

## Ferrel, Mimi

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**From:** Disa Lindgren [REDACTED]  
**Sent:** Thursday, June 17, 2021 11:46 AM  
**To:** Fisch, Alex; Lee, Daniel; McMorrin, Yasmine; Vera, Albert; Eriksson, Goran  
**Cc:** Public Comment at Culver City  
**Subject:** PH-1: Special Culver City Council Meeting - June 17, 2021

Mayor Fisch, Vice Mayor Lee, Council Member McMorrin, Council Member Vera, and Council Member Eriksson,

It is so important that you vote tonight to phase out oil drilling in the Culver City portion of the Inglewood Oil Field (IOF). This phase out should be accomplished within the next five years. This is an important action that can be taken locally in light of global climate change, and doing so is supported by the recent Capital Investment Amortization study.

Your leadership will protect the communities surrounding the IOF and the oil field workers, as Culver City transitions away from the use of dangerous fossil fuels and moves us into a clean energy future.

It is also critical that you ensure that the oil operator, Sentinel Peak Resources, rather than taxpayers is held responsible for the full costs of plugging and abandoning the IOF wells, and all needed site remediation. Workers hired to do this work and to regenerate the site, should be recruited locally, fairly compensated, and unionized, to assure their safety.

I also urge you to implement a community-led public process that puts residents at the center of planning and decision-making regarding future uses for the site of today's IOF, particularly including the local Indigenous community, whose informed consent is critical.

Thank you,

Disa Lindgren

## Ferrel, Mimi

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**From:** Sarah Wiltfong <sarah.wiltfong@bizfed.org>  
**Sent:** Thursday, June 17, 2021 11:53 AM  
**To:** Public Comment at Culver City  
**Subject:** Oppose PH-1. 21-1108 CC - Comment Letter  
**Attachments:** BizFed Inglewood Oil Field OPPOSE.pdf

Hello,

Please find attached for the record BizFed's comment letter in opposition to Culver City's consideration to phase out the Inglewood Oil Field.

Thank you for your consideration. Please reach out to me with any questions.

Sincerely,



**Sarah Wiltfong**

[310.213.8742](tel:310.213.8742) - [sarah.wiltfong@bizfed.org](mailto:sarah.wiltfong@bizfed.org)

[BizFed.org](http://BizFed.org)

A grassroots alliance of more than 200 diverse business groups mobilizing 450,000 employers that employ 4 million people in LA County.

June 17, 2021

Mayor Alex Fisch  
City of Culver City  
*Via eComment*

**Re: Ordinance Terminating Nonconforming Oil Use – OPPOSE**

Mayor Fisch,

We are contacting you on behalf of BizFed, the Los Angeles County Business Federation. We are an alliance of over 200 business organizations who represent 400,000 employers with 4 million employees in Los Angeles County. We are here to express our strong opposition to the proposal terminating nonconforming oil use within the city.

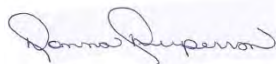
We have several concerns with Culver City's government overreach regarding the Inglewood Oil Field. Our members wonder if this proposal, and its potential adoption, will set a precedent and lead to other cities to believe they can pick and choose what well-established businesses in their area are essential or not. A decision in favor of the phase out will no doubt lead to legal challenges and fees – something the city cannot afford.

What's more, this proposal has not gone through the planning commission, does not have a clear definition of what acceptable land use is, and we challenge the idea that this phase out is not subject to CEQA.

The Inglewood Oil Field employs hundreds of local workers with well-paying full-time jobs. The field also pays Culver City over \$250,000 in taxes and fees each year – revenues that pay for schools, police and fire protections. Culver City needs to make clear to its residents what services will be at stake if the city chooses to move forward with a phase out.

Thank you for your consideration of our letter. If you have any questions, please contact Sarah Wiltfong at [sarah.wiltfong@bizfed.org](mailto:sarah.wiltfong@bizfed.org).

Sincerely,



Donna Duperron  
BizFed Chair  
Torrance Area Chamber



David Fleming  
BizFed Founding Chair



Tracy Hernandez  
BizFed Founding CEO  
IMPOWER, Inc.

CC: Culver City Council Members

## BizFed Association Members

7-Eleven Franchise Owners Association of Southern California  
Action Apartment Association  
Alhambra Chamber of Commerce  
American Beverage Association  
American Institute of Architects - Los Angeles  
Apartment Association of Greater Los Angeles  
Apartment Association, CA Southern Cities, Inc.  
Arcadia Association of Realtors  
AREAA North Los Angeles SFV SCV  
Armenian Trade and Labor Association  
Associated Builders & Contractors, Inc. Southern California Chapter  
Association of Club Executives  
Association of Independent Commercial Producers  
Azusa Chamber of Commerce  
Bell Gardens Chamber of Commerce  
Beverly Hills Bar Association  
Beverly Hills Chamber of Commerce  
Black Business Association  
BNI4SUCCESS  
Bowling Centers of Southern California  
Boyle Heights Chamber of Commerce  
Building Industry Association - Baldyview  
Building Industry Association - LA/Ventura Counties  
Building Industry Association - Southern California  
Building Owners & Managers Association of Greater Los Angeles  
Burbank Association of REALTORS  
Burbank Chamber of Commerce  
Business and Industry Council for Emergency Planning and Preparedness  
Business Resource Group  
CA Natural Resources Producers Assoc  
CalAsian Chamber  
Calabasas Chamber of Commerce  
California Apartment Association- Los Angeles  
California Asphalt Pavement Association  
California Bankers Association  
California Business Properties Association  
California Business Roundtable  
California Cannabis Industry Association  
California Cleaners Association  
California Construction Industry and Materials Association  
California Contract Cities Association  
California Fashion Association  
California Gaming Association  
California Grocers Association  
California Hispanic Chamber  
California Hotel & Lodging Association  
California Independent Oil Marketers Association (CIOMA)  
California Independent Petroleum Association  
California Life Sciences Association  
California Manufacturers & Technology Association  
California Metals Coalition  
California Restaurant Association  
California Retailers Association  
California Small Business Alliance  
California Self Storage Association  
California Society of CPAs - Los Angeles Chapter  
California Trucking Association  
Californians for Balanced Energy Solutions  
Carson Chamber of Commerce  
Carson Dominguez Employers Alliance  
CDC Small Business Finance  
Central City Association  
Century City Chamber of Commerce  
Cerritos Regional Chamber of Commerce  
Chatsworth/Porter Ranch Chamber of Commerce  
Citrus Valley Association of Realtors  
Claremont Chamber of Commerce  
Coalition for Renewable Natural Gas  
Coalition for Small Rental Property Owners  
Commercial Industrial Council/Chamber of Commerce  
Construction Industry Air Quality Coalition

Construction Industry Coalition on Water Quality  
Council on Trade and Investment for Filipino Americans  
Covina Chamber  
Crescenta Valley Chamber of Commerce  
Culver City Chamber of Commerce  
Downey Association of REALTORS  
Downey Chamber of Commerce  
Downtown Center Business Improvement District  
Downtown Long Beach Alliance  
El Monte/South El Monte Chamber  
El Segundo Chamber of Commerce  
Employers Group  
Encino Chamber of Commerce  
Engineering Contractor's Association  
EXP  
F.A.S.T.- Fixing Angelenos Stuck in Traffic FilmLA  
Friends of Hollywood Central Park  
FuturePorts  
Gardena Valley Chamber  
Gateway to LA  
Glendale Association of Realtors  
Glendale Chamber  
Glendora Chamber  
Greater Antelope Valley AOR  
Greater Bakersfield Chamber of Commerce  
Greater Lakewood Chamber of Commerce  
Greater Leimert Park Village Crenshaw Corridor Business Improvement District  
Greater Los Angeles African American Chamber  
Greater Los Angeles Association of REALTORS  
Greater Los Angeles New Car Dealers Association  
Greater San Fernando Valley Regional Chamber  
Harbor Association of Industry and Commerce  
Harbor Trucking Association  
Historic Core BID of Downtown Los Angeles  
Hollywood Chamber  
Hong Kong Trade Development Council  
Hospital Association of Southern California  
Hotel Association of Los Angeles  
Huntington Park Area Chamber of Commerce  
Independent Cities Association  
Industrial Environmental Association  
Industry Business Council  
Inland Empire Economic Partnership  
International Cannabis Business Women Association  
Irwindale Chamber of Commerce  
La Cañada Flintridge Chamber  
LA Fashion District BID  
LA South Chamber of Commerce  
Lancaster Chamber of Commerce  
Larchmont Boulevard Association  
Latin Business Association  
Latino Food Industry Association  
Latino Restaurant Association  
LAX Coastal Area Chamber  
League of California Cities  
Long Beach Area Chamber  
Long Beach Economic Partnership  
Los Angeles Area Chamber  
Los Angeles County Board of Real Estate  
Los Angeles County Waste Management Association  
Los Angeles Gateway Chamber of Commerce  
Los Angeles Gay & Lesbian Chamber of Commerce  
Los Angeles Latino Chamber  
Los Angeles Parking Association  
MADIA Tech Launch  
Malibu Chamber of Commerce  
Marketplace Industry Association  
Motion Picture Association of America, Inc.  
MoveLA  
Multicultural Business Alliance  
NAIOP Southern California Chapter  
Nareit  
National Association of Tobacco Outlets

National Association of Waterfront Employers  
National Association of Women Business Owners - CA  
National Association of Women Business Owners - LA  
National Federation of Independent Business  
National Hookah Community Association  
National Latina Business Women's Association  
Orange County Business Council  
Pacific Merchant Shipping Association  
Pacific Palisades Chamber  
Panorama City Chamber of Commerce  
Paramount Chamber of Commerce  
Pasadena Chamber  
Pasadena Foothills Association of Realtors  
PhRMA  
Planned Parenthood Affiliates of California  
Pomona Chamber  
Propel LA  
Rancho Southeast Association of Realtors  
ReadyNation California  
Recording Industry Association of America  
Regional Black Chamber-San Fernando Valley  
Regional Hispanic Chamber of Commerce  
Regional San Gabriel Valley Chamber  
Rosemead Chamber  
San Dimas Chamber of Commerce  
San Gabriel Chamber of Commerce  
San Gabriel Valley Economic Partnership  
San Pedro Peninsula Chamber  
Santa Clarita Valley Chamber  
Santa Clarita Valley Economic Development Corp.  
Santa Monica Chamber of Commerce  
Sherman Oaks Chamber  
South Bay Association of Chambers  
South Bay Association of Realtors  
South Gate Chamber of Commerce  
Southern California Contractors Association  
Southern California Golf Association  
Southern California Grantmakers  
Southern California Leadership Council  
Southern California Minority Suppliers Development Council Inc.  
Southern California Water Coalition  
Southland Regional Association of Realtors  
Sunland/Tujunga Chamber  
Sunset Strip Business Improvement District  
Torrance Area Chamber  
Town Hall Los Angeles  
Tri-Counties Association of Realtors  
United Cannabis Business Association  
United Chambers - San Fernando Valley & Region  
United States-Mexico Chamber  
Unmanned Autonomous Vehicle Systems Association  
US Green Building Council  
US Resiliency Council  
Valley Economic Alliance, The  
Valley Industry & Commerce Association  
Vermont Slauson Economic Development Corporation  
Vernon Chamber  
Veterans in Business Network  
Vietnamese American Chamber  
Warner Center Association  
West Hollywood Chamber  
West Hollywood Design District  
West Los Angeles Chamber  
West San Gabriel Valley Association of Realtors  
West Valley/Warner Center Chamber  
Western Electrical Contractors Association  
Western Manufactured Housing Association  
Western States Petroleum Association  
Westside Council of Chambers  
Whittier Chamber of Commerce  
Wilmington Chamber  
World Trade Center

**From:** noreply@granicusideas.com  
**Sent:** Thursday, June 17, 2021 11:53 AM  
**To:** Public Comment at Culver City  
**Subject:** New eComment for City Council Meeting Agenda on 2021-06-17 6:00 PM - Special Meeting



## New eComment for City Council Meeting Agenda on 2021-06-17 6:00 PM - Special Meeting

Terry Saucier submitted a new eComment.

Meeting: City Council Meeting Agenda on 2021-06-17 6:00 PM - Special Meeting

Item: PH-1. 21-1108 CC - PUBLIC HEARING: (1) Consideration of the City Council Oil Drilling Subcommittee's ("Subcommittee") Recommendation to Terminate Nonconforming Oil Uses and Phase the Closure and Removal of Nonconforming Oil Uses over a Five-Year Period ending July 28, 2026; (2) Introduction of an Ordinance Approving Zoning Code Amendment P2021-0036-ZCA, Amending Culver City Municipal Code Title 17: Zoning Code, Section 17.610.010.D - Nonconforming Oil Use, to Terminate Nonconforming Oil and Gas Uses by July 28, 2026; and (2) Direction to the Subcommittee and City Staff as Deemed Appropriate.

eComment: Culver City is poised to make history in its effort to mitigate climate change and establish environmental justice. I strongly endorse passage of agenda item PH-1, the ordinance to phase out oil drilling and remediate all oil wells within Culver City. The issue has been thoroughly studied and a plan as well as timeline has been established to complete it. Only the crucial step of officially ordering its elimination and executing it remains. Culver City has the opportunity to begin the monumental task of de-activating an oil field, ending oil and gas extraction within (it) and completing its restoration. This act can be the inaugural act that sets off the end of oil and gas extraction in Los Angeles, in California and elsewhere. There are health, environmental justice, economic, ecological and societal benefits associated with the phase-out. -Health Benefits: Proximity to oil and gas wells is associated with heightened health risks, illnesses and mental health disorders. This action would severely reduce the prevalence of such dangers, risks and threats. This is especially important and relevant in the midst of the current pandemic. -Establish Environmental Justice: A majority of BIPOC and low income communities reside within close proximity to these oil fields and oil fields in general due to institutionalized environmental racism and racist practices such as redlining. -Economic Benefits: The closure of local oil fields will inevitably generate new opportunities, specifically the remediation of oil wells, land restoration and the establishment new power sources. These opportunities, therefore, represent a source of additional jobs short and long term. -Ecological Benefits: The climate crisis is not abating. Therefore, an expeditious timeline for ending oil and gas extraction, subsequently plugging the wells and monitoring the transition should be implemented to begin reducing emissions that exacerbate climate change, reduce air quality and contaminate the soil and

water. -Societal Benefits: This ordinance could be used to make fossil fuel producers responsible for cleaning up the mess and reversing (some) of the damage done to the community. It is an opportunity to transform and remake Culver City into a modern, sustainable metropolis. It is an opportunity to allow disenfranchised members of the community to engage in the planning process. It is an opportunity to install renewable energy and storage instead of traditional fossil fuels, to establish beautiful green space and to facilitate the transition to a resilient, eco-city. Culver City can begin removing urban oil fields from the landscape and catalyze the transition to renewable energy with this singular vote. The arc can only bend toward justice and the trajectory set towards a cleaner, greener future if we act, if we take such action. Allow community interests and environmental interests (which are one and the same) to govern policy and supplant corporate and industrial interests. I am not alone in endorsing phasing out oil and gas extraction. I am not alone in asking the City Council to vote for phasing it out. Culver City could lead the way, demonstrate its feasibility and create a ripple effect inspiring further cities and regions to do the same. In doing so, millions of citizens will experience the enumerated benefits. Thank you,  
Terry Saucier

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## Ferrel, Mimi

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**From:** Christina Dixon <cdixon@sentinelpeakresources.com>  
**Sent:** Thursday, June 17, 2021 11:56 AM  
**To:** Clerk, City; Public Comment at Culver City  
**Subject:** Mineral Owner Letter RE: Proposed Ordinance  
**Attachments:** 2021-06-17 Amortization Mineral Owner Letter.pdf

Good afternoon,

On behalf of over a dozen mineral owners in the City portion of the Inglewood Oil Field, please see the attached comment letter in advance of the June 17, 2021 City Council Meeting regarding the proposed ordinance terminating nonconforming oil uses.

Regards,

**Christina Dixon | Land Manager**  
**Sentinel Peak Resources**  
O: 661.395.5276 | C: 661.858.9389  
[cdixon@sentinelpeakresources.com](mailto:cdixon@sentinelpeakresources.com)

June 17, 2021

City of Culver City  
City Council for the City of Culver City  
9770 Culver Boulevard  
Culver City, CA 90230-0507  
[public.comment@culvercity.org](mailto:public.comment@culvercity.org)

RE: Amortization Program for the Culver City Inglewood Oil Field – June 17, 2021

Dear Culver City Council,

We, the undersigned, represent a portion of the royalty owners with property interests in the form of mineral rights located within Culver City's portion of the Inglewood Oil Field. We are writing to oppose the proposed Zoning Code Amendment, P2021-0036-ZCA implementing a proposed amortization of our vested property interest by July 2026. We also support and incorporate by reference the opposition letter and reports submitted by Sentinel Peak Resources California, LLC, the operator of the Inglewood Oil Field.

We staunchly support the Inglewood Oil Field. The oil produced in Culver City supports our livelihood and the energy relied upon by the State. We rely on this income to support our families.

Our mineral rights are vested property rights that are not yours to arbitrarily take away.

Depriving us of our property rights through adoption of this ordinance is unconstitutional, and we intend to defend ourselves to the fullest protection afforded by the law if this ordinance is adopted.

Representing taxpayers of Culver City, we urge you to re-direct your efforts, and our hard-earned money, to advance the numerous truly pressing needs, such as economic recovery, homelessness and public safety, which face the City and its constituents rather than incurring significant liabilities through this oppressive and legally flawed action.

Sincerely,

Culver City Mineral Owners and Mineral Owner Representatives

*Sandra V. Naftzger*  
*Roy E. Dritley*  
*Daniel W. Hugens*  
*Neil H. Harris*  
*Barney R. LeLong*  
*Jeanne LeLong McEachern*  
*Mark Albert Le Long*

*Alan V. Dritley*  
*John Vickers McAllister*  
*Christo Jacobs*  
*Katy M. Alve*  
*Annette LeLong*  
*Donna Mae Le Long*

*Eric C. Dritley*  
*Teresa Jeanne McAllister*  
*Marsha Hunt Condit*  
*Duke Ligon, Owner*  
*Margaret LeLong Armour*  
*Debra Ann Le Long*

## Ferrel, Mimi

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**From:** Tony DeTrinidad <Tony.DeTrinidad@dc36.org>  
**Sent:** Thursday, June 17, 2021 12:12 PM  
**To:** Fisch, Alex; Public Comment at Culver City; Clerk, City  
**Cc:** Robert D. Smith; Stephanie Robles  
**Subject:** IUPAT DC 36 Letter RE Oil Field Item - Culver City Council  
**Attachments:** IUPAT DC 36 Letter RE Oil Field Item (Culver City).pdf

Good afternoon, please view the attached letter.

Thank you,

Tony DeTrinidad  
IUPAT DC 36  
(626) 216 – 3089



# Painters & Allied Trades District Council 36

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Luis F. Robles

Business Manager

DRYWALL FINISHERS, FLOORLAYERS, GLAZIERS, PAINTERS, TRADESHOW & SIGNCRAFT

June 17, 2021

The Honorable Council of Culver City  
Culver City Hall

Dear Councilmembers,

Much of the drywall, floor laying, glazing, painting, and sign craft across commercial sites in Los Angeles are executed by members of the Painters union and allied trades. The entirety of Westfield's furniture, lighting, and signage portfolio is produced by a unionized workforce at a well-known motion picture studio prop shop. Similarly, Los Angeles area oil production facilities large and small utilize contractors in our trades. The work is growing as decarbonization, carbon sequestration, recycling, and clean energy generation (co-gen) occur at petroleum facilities. Painters are also a racially diverse union in Los Angeles and most major metropolitan areas in the country. In fact, we are the first construction trades union to elect an African American general president, Kenneth Rigmaiden-who has served since 2013.

**We are alarmed that Culver City is rushing to end production in its oil field without negotiating a resolution of its concerns.**

Painters have done very well to expand opportunity to our trade. We work with those who have struggled in their lives and need a second chance. This union has built income supports for retirement security for working people. We fight poverty by improving the built environment, promoting effective stewardship of the environment, securing agreements with employers, and helping them work with stakeholders to partner for useful projects.

With these considerations in mind, **we ask that you consider delaying today's vote and offer an opportunity to see terms from the oil field operator.** The Painters will join other trade unionists to push for an equitable solution that is fair and promotes a suitable use for the site as it transitions. We will be there to build what comes next. However, we do not think it wise to enact a zoning amendment today that terminates oil production beginning July 28<sup>th</sup> of this year.

**Please consider delaying tonight's vote. Livelihoods depend on it. Good faith negotiations may be able to yield a balanced solution with the benefit of time.**

Thank you,  
Political Director - Robert Smith  
International Union of Painter and Allied Trades  
District Council 36

## Ferrel, Mimi

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**From:** Edward S. Hazard [REDACTED]  
**Sent:** Thursday, June 17, 2021 12:20 PM  
**To:** Public Comment at Culver City  
**Subject:** Proposed Zoning Code Amendment, P2021-0036-ZCA, Amortization Program, Inglewood Oil Field, June 17, 2021  
**Attachments:** NARO-CA letter to Culver City Council, June 17, 2021, letterhead June 17.pdf

Dear Culver City Council:

The attached Public Comment letter is being submitted by NARO-California in opposition to the above referenced Proposed Zoning Code Amendment. Please place this letter in the appropriate public file.

Sincerely,  
Edward S. Hazard, President  
NARO-California



**NATIONAL ASSOCIATION OF ROYALTY OWNERS – CALIFORNIA, INC.**  
*Serving the Citizens Who Own California's Oil and Gas Resources*

City of Culver  
City Council for the City of Culver City  
9770 Culver Boulevard  
Culver City, CA 90230-507  
[Public.comment@culvercity.org](mailto:Public.comment@culvercity.org)

June 17, 2021

RE: Proposed Zoning Code Amendment, P2021-0036-ZCA, Amortization Program, Inglewood Oil Field, June 17, 2021

Dear Culver City Council,

The California Chapter of the National Association of Royalty Owners supports the interests of the estimated 700,000 royalty owners in California, and even more mineral owners. We **STRONGLY** oppose the above referenced proposed Zoning Code Amendment and Amortization Program.

If passed, this Amendment will negatively affect hundreds of royalty owners in the Inglewood Oil Field. The mineral rights owned by these royalty owners are valuable assets of theirs. We don't know how you equitably amortize mineral rights, especially when there is current production and known reserves.

Nobody knows how many years of production are left in this field. Mineral owners can't move their mineral rights, can't produce their oil somewhere else. Oil can only be produced from where it was placed by nature. It is not like a hardware store that can move its business to another location. The mineral and royalty owners' assets will have no value if they are no longer able to produce oil from them. Their assets will have been taken from them by the City. The royalty and mineral owners will be forced to take action to protect their assets.

If this happens, NARO-California will stand with the royalty owners, just as we did in Monterey County, and as we are now doing in Ventura County. When Monterey County passed Measure Z, NARO-California filed suit together with over 80 royalty owners as named co-plaintiffs. In addition, five oil companies filed suit. Millions were spent on legal fees and costs. We won, the County lost. Legal action is a last resort. We do not take it lightly. It is something I hope we never have to do again. Please reconsider the direction in which you seem headed.

Sincerely,

Edward S. Hazard, President

***Founded in 1980, the National Association of Royalty Owners is the only national organization representing solely, and without compromise, oil and gas royalty owners' interests.***

**From:** noreply@granicusideas.com  
**Sent:** Thursday, June 17, 2021 12:46 PM  
**To:** Public Comment at Culver City  
**Subject:** New eComment for City Council Meeting Agenda on 2021-06-17 6:00 PM - Special Meeting



## New eComment for City Council Meeting Agenda on 2021-06-17 6:00 PM - Special Meeting

Edward Hazard submitted a new eComment.

Meeting: City Council Meeting Agenda on 2021-06-17 6:00 PM - Special Meeting

Item: PH-1. 21-1108 CC - PUBLIC HEARING: (1) Consideration of the City Council Oil Drilling Subcommittee's ("Subcommittee") Recommendation to Terminate Nonconforming Oil Uses and Phase the Closure and Removal of Nonconforming Oil Uses over a Five-Year Period ending July 28, 2026; (2) Introduction of an Ordinance Approving Zoning Code Amendment P2021-0036-ZCA, Amending Culver City Municipal Code Title 17: Zoning Code, Section 17.610.010.D - Nonconforming Oil Use, to Terminate Nonconforming Oil and Gas Uses by July 28, 2026; and (2) Direction to the Subcommittee and City Staff as Deemed Appropriate.

eComment: City of Culver June 17, 2021 City Council for the City of Culver City 9770 Culver Boulevard Culver City, CA 90230-507 Public.comment@culvercity.org RE: Proposed Zoning Code Amendment, P2021-0036-ZCA, Amortization Program, Inglewood Oil Field, June 17, 2021 Dear Culver City Council, The California Chapter of the National Association of Royalty Owners supports the interests of the estimated 700,000 royalty owners in California, and even more mineral owners. We STRONGLY oppose the above referenced proposed Zoning Code Amendment and Amortization Program. If passed, this Amendment will negatively affect hundreds of royalty owners in the Inglewood Oil Field. The mineral rights owned by these royalty owners are valuable assets of theirs. We don't know how you equitably amortize mineral rights, especially when there is current production and known reserves. Mineral owners can't move their mineral rights, can't produce their oil somewhere else. Oil can only be produced from where it was placed by nature. It is not like a hardware store that can move its business to another location. The mineral and royalty owners' assets will have no value if they are no longer able to produce oil from them. Their assets will have been taken from them by the City. The royalty and mineral owners will be forced to take action to protect their assets. If this happens, NARO-California will stand with the royalty owners, just as we did in Monterey County, and as we are now doing in Ventura County. When Monterey County passed Measure Z, NARO-California filed suit together with over 80 royalty owners as named co-plaintiffs. In addition, five oil companies filed suit. Millions were spent on legal fees and costs. We won, the County lost. Legal action is a last resort. We do not take it lightly. It is something I hope we never have to do again. Please

reconsider the direction in which you seem headed. Sincerely, Edward S. Hazard, President  
NARO-CA

[View and Analyze eComments](#)

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## Ferrel, Mimi

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**From:** Heather Pearce <HPearce@sentinelpeakresources.com>  
**Sent:** Thursday, June 17, 2021 1:03 PM  
**To:** Clerk, City; Public Comment at Culver City  
**Subject:** Sentinel Peak Resources Correspondence RE: Proposed Ordinance  
**Attachments:** 2021.06.17\_Letter to Culver\_gbp.pdf

Good afternoon,

On behalf of Sentinel Peak Resources, please find attached correspondence in connection with the June 17, 2021 City Council Meeting concerning the proposed ordinance terminating nonconforming oil uses.

Thank you,

Heather Stephens Pearce  
Director Land Development  
[Sentinel Peak Resources, LLC](#)  
5640 South Fairfax Avenue  
Los Angeles, CA 90056  
O: 323.298.2213  
C: 214.629.8214



June 17, 2021

City Council for the City of Culver City  
9770 Culver Boulevard  
Culver City, CA 90232

***Re: Proposed Zoning Code Amendment P2021-0036-ZCA – City Council June 17, 2021 Public Hearing***

Dear Mayor, Vice Mayor and Honorable Council Members,

In advance of tonight's Special City Council Meeting regarding the City of Culver City's proposed Zoning Code Amendment, Ordinance P2021-0036-ZCA (the "**Ordinance**"), Sentinel Peak Resources California LLC ("**Sentinel Peak**") is submitting lengthy rebuttals to the City's agenda and proposed Ordinance. Those rebuttals are rooted in fact and the law and Sentinel Peak stands by the arguments made therein.

However, we would also like to make it abundantly clear that proceeding down the litigious and extraordinarily lengthy path we are currently on is not Sentinel Peak's preference. Rather, we would prefer to work amicably with the City in good faith, assuming the City agrees to do the same, to come to a resolution on the future of the City portion of the Inglewood Oil Field that is outside the context of amortization but achieves the goals of the City and its constituents in addition to the goals of Sentinel Peak.

Sentinel Peak has an excellent compliance record at the IOF and has acted as a responsible and good neighbor through the years. In addition, Sentinel Peak has had significant success in resolving oil and gas disagreements with government officials in other jurisdictions, including in the City of Los Angeles, working with government officials to move forward to achieve local goals. We believe that same success is achievable here.

The disagreements we have had over the last several years have cost a significant amount of money and resources for us both. Sentinel Peak is committed to engaging in a productive dialogue with the City regarding these alternatives and hopes the City is open to accepting this invitation.

Accordingly, Sentinel Peak urges the City to take a pause in the Ordinance process to engage in this dialogue. We will be attendance at the hearing tonight and are available to continue these discussions in a timely fashion beyond that point.

Sincerely,

George Paspalof  
Executive Vice President

[gpaspalof@sentinelpeakresources.com](mailto:gpaspalof@sentinelpeakresources.com)

**Ferrel, Mimi**

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**From:** noreply@granicusideas.com  
**Sent:** Thursday, June 17, 2021 1:35 PM  
**To:** Public Comment at Culver City  
**Subject:** New eComment for City Council Meeting Agenda on 2021-06-17 6:00 PM - Special Meeting



## New eComment for City Council Meeting Agenda on 2021-06-17 6:00 PM - Special Meeting

Liz Gosnell submitted a new eComment.

Meeting: City Council Meeting Agenda on 2021-06-17 6:00 PM - Special Meeting

Item: PH-1. 21-1108 CC - PUBLIC HEARING: (1) Consideration of the City Council Oil Drilling Subcommittee's ("Subcommittee") Recommendation to Terminate Nonconforming Oil Uses and Phase the Closure and Removal of Nonconforming Oil Uses over a Five-Year Period ending July 28, 2026; (2) Introduction of an Ordinance Approving Zoning Code Amendment P2021-0036-ZCA, Amending Culver City Municipal Code Title 17: Zoning Code, Section 17.610.010.D - Nonconforming Oil Use, to Terminate Nonconforming Oil and Gas Uses by July 28, 2026; and (2) Direction to the Subcommittee and City Staff as Deemed Appropriate.

eComment: I sent our comment letter to publiccomment@culvercity.org, Heather and all councilpersons and ask that it be read into the record and included in final meeting minutes.

[View and Analyze eComments](#)

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**Ferrel, Mimi**

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**From:** armen ross [REDACTED]  
**Sent:** Thursday, June 17, 2021 1:38 PM  
**To:** Fisch, Alex; Public Comment at Culver City; Clerk, City  
**Subject:** PH-1. 21-1108 Inglewood Oil Field  
**Attachments:** Culver City Oil Fields.docx

Dear Sirs,

Please accept the attached letter regarding Item PH-1 file 21-1108 on the June 17, 2021 Culver City Council Agenda.

Thank you.

***Armen D. Ross***

President, Crenshaw Chamber of Commerce  
PO Box 8193  
Los Angeles, CA 90008  
323.293.2900



# CRENSHAW CHAMBER OF COMMERCE

EMPOWERING BUSINESS & PROMOTING COMMERCE SINCE 1933

## EXECUTIVE BOARD

June 17, 2021

### **ARMEN D. ROSS**

President  
The Ross Group

Culver City Council  
Culver City Hall  
Culver City, CA 90232

Councilmembers,

### **GARY KYNARD**

Executive V.P.  
Endsure.com

As the leading local business trade association to the east of your lovely City, we have worked to accomplish positive outcomes. They have included improving public transit and supporting the development of affordable housing. Most of our members are small and Black-owned enterprises. A good number are also women-owned. Several of our members work in the oil and gas industry and have in various ways serviced the Inglewood Oil Field over the years. Your zoning amendment has caused alarm given that it attempts to abruptly end petroleum operations at an oil field that is such a major economic engine. Business owners respect public process but are compelled to raise objections when unnecessary harm will come to our members and the greater business community. **Delay of today's vote is essential to provide an effective solution to what is basically the City's dispute with a major employer.**

### **DANIEL LEATHERS**

V.P. of Finance  
US Bank

Some people do like oil companies, their operations, and their continued existence as enterprises. Others use various rationale to oppose those companies. The contribution to climate disruption by industrial activity is widespread and the oil industry is the poster child. What has not been acknowledged by Culver City is that to produce oil, any operator must orchestrate a complex scientific process that balances the natural environment and efficient corporate management. Sentinel Peak and its predecessors have worked to keep the field safe and productive. There have been points of great tension. There have been mistakes. The residents of Culver City have soured on production in their City. It is well within their right to seek options and a more favorable resolution of their concerns with oil field in their boundaries.

### **DONNA GRAYSON**

V.P. of Non-Profit  
Grayson's Outreach

**Businesses do not need to unduly suffer because of the desires to eliminate production in Culver City.** Black-owned businesses across Culver City and its neighboring areas that primarily employ Black Angelenos need not suffer from abrupt decisions like those proposed in the zoning amendment before the Council today.

### **JANET MENDEZ**

V.P. of Operations  
The Ross Group

**Please consider delaying today's vote to offer a modest period to find a solution with the oil field operator.** Businesses understand changes and transitions. The challenge is to mitigate disruption and harm to employees and the thin margins of small businesses.

Thank you,

Armen D. Ross  
President & CEO

**CRENSHAW CHAMBER OF COMMERCE**

P.O. BOX 8193, LOS ANGELES, CA 90008

(323) 293 - 2900

## Ferrel, Mimi

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**From:** Ralph Combs <RalphC@termoco.com>  
**Sent:** Thursday, June 17, 2021 1:43 PM  
**To:** Public Comment at Culver City  
**Subject:** Council Meeting 6/17/2021 - Agenda #PH-1 / File #21-1108 - OPPOSE  
**Attachments:** Culver City - Termination of Oil Operations - Oppose - 2021-06-16.pdf

Dear Clerk,  
Attached please find a public comment in opposition to Agenda #PH-1 / File #21-1108  
Thank you,

**Ralph Combs** | Manager of Regulatory,  
Community, and Government Affairs  
**The Termo Company**

D / M / F: (562) 279-1955 | [RalphC@TermoCo.com](mailto:RalphC@TermoCo.com)  
P.O. Box 2767, Long Beach, CA 90801

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June 16, 2021

City of Culver City  
City Clerk's Office  
9770 Culver Boulevard  
Culver City, CA 90232

Via Email: [public.comment@culvercity.org](mailto:public.comment@culvercity.org)

Re: Termination of Nonconforming Oil Use / Phase Out of Oil Production - Opposition  
City Council Meeting 6/17/2021  
Agenda #PH-1 / File #21-1108

Dear Mayor and Council Members,

Termo is an independent oil and gas exploration and production company located in Long Beach. The company owns, and produces oil and gas from, minerals in the Los Angeles Basin. As such, we have noted with concern Culver City's ongoing effort to terminate oil production in the Inglewood Field and have participated in several previous meetings regarding this effort by Culver City.

We are dismayed by this ongoing and illegal attempt to force the shut-down and revocation of a corporation and individual (mineral owners) property rights. This effort, without offering compensation, amounts to a taking and is unconstitutional. Additionally, it is short-sighted, does nothing to decrease demand for crude oil, nor will it increase environmental protection.

In short and without going into the legal justifications, as a business in the Los Angeles area we are absolutely opposed to this effort. This action, if carried through, will inevitably end in numerous lawsuits against Culver City for the taking of private property without compensation.

Thank you for the opportunity to provide these comments.

Sincerely,



Ralph E. Combs  
Manager of Regulatory and Government Affairs  
The Termo Company

## Ferrel, Mimi

---

**From:** Andrew Hattala [REDACTED]  
**Sent:** Thursday, June 17, 2021 1:43 PM  
**To:** speakup@granicus.com; Clerk, City  
**Subject:** PH-1 Public Comment

Good Afternoon,

Was my public comment (from Andy Hattala) on PH-1 received? I did not receive a confirmation e-mail this morning. Please advise. Thank you.

Andy Hattala  
Culver City Resident and Co-Chair CRPLA



## Ferrel, Mimi

---

**From:** Public Comment at Culver City  
**Sent:** Thursday, June 17, 2021 2:05 PM  
**To:** Public Comment at Culver City  
**Subject:** FW: Community Letter in Support of Motion to Phase Out and Clean Up Oil  
**Attachments:** Culver City Phase-Out Group Letter.pdf

---

**From:** Nicole Levin <[nicole.levin@sierraclub.org](mailto:nicole.levin@sierraclub.org)>  
**Sent:** Tuesday, June 15, 2021 2:39 PM  
**To:** Fisch, Alex <[Alex.Fisch@culvercity.org](mailto:Alex.Fisch@culvercity.org)>; Lee, Daniel <[Daniel.Lee@culvercity.org](mailto:Daniel.Lee@culvercity.org)>; [yasmin.mcmorrin@culvercity.org](mailto:yasmin.mcmorrin@culvercity.org);  
Eriksson, Goran <[Goran.Eriksson@culvercity.org](mailto:Goran.Eriksson@culvercity.org)>; Vera, Albert <[Albert.Vera@culvercity.org](mailto:Albert.Vera@culvercity.org)>  
**Cc:** Melanie Traxler <[mtraxlerpplus@aol.com](mailto:mtraxlerpplus@aol.com)>; Baker, Heather <[heather.baker@culvercity.org](mailto:heather.baker@culvercity.org)>; David Haake  
<[dhaake3@gmail.com](mailto:dhaake3@gmail.com)>; Monica Embrey <[monica.embrey@sierraclub.org](mailto:monica.embrey@sierraclub.org)>  
**Subject:** Community Letter in Support of Motion to Phase Out and Clean Up Oil

Dear Mayor Fisch, Vice-Mayor Lee, and Councilmembers,

Ahead of Thursday's public hearing, I wanted to send along this letter signed by many community groups in support of the motion to phase out and clean up oil wells in Culver City.

Best,

Nicole Levin

--



**Nicole Levin** (*Pronouns: she/her/hers*)  
Campaign Representative  
Beyond Dirty Fuels Campaign  
[nicole.levin@sierraclub.org](mailto:nicole.levin@sierraclub.org)  
707-688-9275 (C)



June 15, 2021

Mayor Alex Fisch  
Vice-Mayor Daniel Lee  
Council Member Goran Eriksson  
Council Member Yasmine-Imani McMorrin  
Council Member Albert Vera  
9770 Culver Blvd.  
Culver City, CA 90232

**Re: SUPPORT for City-Initiated Zoning Code Amendment to Chapter 17.610 (Nonconforming Uses, Structures and Parcels), Section 17.610.010.D (Nonconforming Oil Use), to terminate and phase out over a five-year period (by July 28, 2026) the closure and removal of nonconforming oil and gas activities within Culver City, including the Culver City portion of the Inglewood Oil Field (“Ordinance”)**

Dear Mayor Fisch, Vice-Mayor Lee, and Council Members:

On behalf of the undersigned organizations, which represent tens of thousands of people living, working, and recreating in and around Culver City, we write in full support of Culver City’s plan to phase out and clean up oil drilling throughout its portion of the Inglewood

Oil Field (IOF). To that end, we urge you to approve the proposed Ordinance at the public hearing on June 17.

This action is urgent and necessary because oil drilling is a proven public health and safety risk. Numerous studies link proximity to oil and gas wells to a host of health problems, including increased risk of preterm births and high-risk pregnancies, asthma and other respiratory illnesses, depression and other adverse mental health outcomes, and some types of cancer. Also, oil spills and leaks at well sites threaten local ecosystems and waterways. Over the last few years, we have seen multiple oil spills and leaks at the IOF, including one this past April that involved a release of 1,600 gallons of oil.

Culver City also has a chance to start the process of correcting a serious and long-standing environmental injustice. As a result of decades of redlining, environmental racism, and the indifference of politicians, most oil fields in the Los Angeles region -- including the IOF -- are situated in close proximity to low-income Black and Latinx communities. By phasing out oil drilling in a portion of the IOF, Culver City would be taking the lead in undoing years of racist land use decisions that have directly harmed BIPOC communities in South Los Angeles.

With this proposed Ordinance and direction to the Subcommittee and staff to continue to work on “just transition” strategies, Culver City has an unprecedented opportunity to create high-quality jobs in the plugging and abandonment of active oil wells, the remediation of the well sites and their surroundings, and the repurposing of the area for beneficial reuse. We would urge that any agreements covering the “just transition” require good-quality jobs, in terms of prevailing wage compensation, benefits (health care, paid sick leave, retirement, etc.), access to union representation (including card check agreements), and training opportunities as needed. Local and targeted hire provisions are necessary to ensure equitable access by race and gender to these expanding job opportunities, and should prioritize fossil fuel workers and frontline community members. We support strong consideration of project labor agreements and community benefit agreements. We further encourage strategies to support any fossil fuel workers who may be displaced with safety nets such as healthcare, wage replacement, retraining and high-quality job placement.

At the same time, processes and mechanisms must be put in place to ensure that current and previous operators of the IOF are held responsible for the costs of well plugging and abandonment, remediation, and cleanup. Taxpayers should not have to bail out the oil industry for any pollution resulting from oil operations. Furthermore, during the phase-out period, robust monitoring and inspection protocols must be established to ensure that, while oil operations remain, strict regulatory standards are followed to minimize the chances of a catastrophic accident, spill, or exposure. For example, any agreements with the operator should include funding mechanisms to cover the costs of monitoring and potential mishaps so these potential future costs do not fall on City taxpayers.

Looking ahead, Culver City residents and neighboring communities should be engaged to help determine future uses at the IOF. We encourage Culver City to consider a public process

that allows locally impacted residents to provide meaningful input into the site's future uses. Also, we feel strongly that free, prior and informed consent must be obtained from the local Indigenous communities regarding future uses. Consideration should be given to reserving a significant portion of the IOF as parkland and open space for community use, and/or as wildlife habitat or a wildlife corridor, as well as using the land for distributed renewable energy resources, including generation and storage, to help the City and its residents become more energy resilient.

We support the prohibition of new drilling, redrilling, and deepening after July 28, 2021 and the five-year plugging and remediation timeline in the Ordinance. Urgency dictates that phase-out must be initiated and completed as soon as possible. Our communities have suffered and our health and wellbeing have been put at risk for far too long. We urge you to consider the shortest possible phase-out timeline, given the impacts of neighborhood oil drilling on our health, environment, and climate. The plugging, capping, abandonment, and remediation of the wells and immediate surrounding areas should be undertaken as quickly as possible.

Thank you for considering our comments.

Sincerely,

Martha Dina Arguello, Executive Director, Physicians for Social Responsibility-Los Angeles and Co-Chair, STAND-LA Coalition

Eric Romann, STAND-LA Coalition Coordinator

Alison Hahm, Associate Attorney, Communities for a Better Environment

Richard Parks, President Redeemer Community Partnership

Rabeya Sen, Policy Director, Esperanza Community Housing

Reverend Louis Chase, Holman United Methodist Church

Sonya Vasquez, Chief Operations Officer, Community Health Councils

David Haake, M.D., Chair, Clean Break Committee, Angeles Chapter, Sierra Club

Nicole Levin, Campaign Representative, Beyond Dirty Fuels, Sierra Club

Damon Nagami, Senior Attorney, Natural Resources Defense Council

Ethan Senser, Southern California Organizer, Food & Water Watch

Liz Jones, Staff Attorney, Center for Biological Diversity



**CONE FEE TRUST**  
**LIZ K. GOSNELL, TRUST AGENT**  
**2335 EAST COLORADO BOULEVARD, SUITE 115-123**  
**PASADENA, CA 91107**  
**626.533.3730** [lizkibbeygosnell@gmail.com](mailto:lizkibbeygosnell@gmail.com)

June 17, 2021

The City of Culver City City Council  
Mayor Alex Fisch  
Vice Mayor Daniel Lee  
Council Member Goran Eriksson  
Council Member Yasmine-Imani McMorris

sent via email  
[alex.fisch@culvercity.org](mailto:alex.fisch@culvercity.org)  
[daniel.lee@culvercity.org](mailto:daniel.lee@culvercity.org)  
[goran.eriksson@culvercity.org](mailto:goran.eriksson@culvercity.org)  
[yasmine-imani.mcmorris@culvercity.org](mailto:yasmine-imani.mcmorris@culvercity.org)

**Re: City Council June 17, 2021, Amending zoning code 2021-0036-ZCA – nonconforming oil use, to terminate nonconforming oil and gas use by July 28, 2026 Comments and Objections of Landowner Cone Fee Trust**

Dear Mayor, Vice Mayor and Council Members,

On behalf of the Cone Fee Trust (CFT), an owner within the Inglewood Oil Field (IOF) and the stakeholder in proceedings, CFT provides comments as follows. Attorney Charles Moore representing the Vickers Group, the major landowner in the Culver City portion of the IOF, joins in the comments expressed within.

Our attached comment letters, McGarrigle, Kenny & Zampiello, APC of August 13, 2020 and Cone Fee Trust of June 4, 2020, outline our concerns since the City's efforts to interfere with and terminate the lawful uses of the IOF began. The City Council has not substantively addressed the comments of the landowners, including that of CFT and the Vickers Group and said parties request the City Council provide public responses to the specific issues raised yet again by the stakeholders.

The City Council's latest approach – an effort to impose a zoning change – is untenable, fatally flawed on myriad levels and is properly rejected. As the City's counsel should have informed the City Council before this meeting, if not years ago as the endless but insupportable efforts to interfere with the landowner's property and use rights in the IOF have persisted to no avail and at great (but unnecessary) cost to the City, the proposed zoning change is unlawful as the City has not complied with the requirements therefor including, without limitation:

- General Plan requirements – The City has not complied, the steps necessary for compliance are incomplete and the process and due process associated therewith has not conformed with the law;
- Planning Commission – the required meeting and review has not occurred;
- CEQA – required but not completed by the City and, therefore, not in conformance with the law;
- EIR – required, completed by City and never presented to public and abandoned, stale and not actionable.

In addition, for more than a decade, the City has embarked on path after path to attempt to interfere with the IOF operations and uses and, thus, the property rights of the stakeholders. Rather than appreciate the benefits from the cash the IOF operations provide the City, estimates – based on the known City

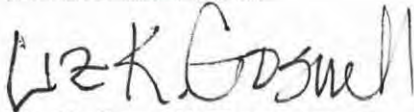


actions and expenditures – suggest the City has expended (but buried from review of the public) several million dollars of taxpayer funds to try to stop a use that helps fund the City. The City Council has not been forthright concerning all funds expended related to the efforts to stop the operators and, generally, the uses at the IOF and an independent forensic audit is warranted. The stakeholders have requested the City's voluntary compliance and transparency, asking for an actual accounting several times; yet, the City scoffs at transparency and has provided the public zero full disclosure regarding its now, at least 14 year effort to close the IOF and its lawful uses.

As has been recommended several times, a far cheaper and more efficient alternative has existed: Culver City can join LA County's CSD to protect the city and spend these funds, not on the windmills of an illegal zoning attempt, but on those services and benefits the citizens need but which are otherwise subject to the budget cuts from the Pandemic. If any councilperson is in favor of transparency, accountability, fiscal responsibility, and the interests of all its citizens, this zoning change to terminate nonconforming oil and gas use and any action thereon should be recommended to be rejected and abandoned and the limited resources utilized for essential services as the post Pandemic reality leaving our municipalities with actual day-to-day budgets decimated.

Very sincerely yours,

CONE FEE TRUST

A handwritten signature in black ink that reads "Liz K. Gosnell". The signature is written in a cursive, flowing style.

Liz K. Gosnell, Trust Agent



**CONE FEE TRUST**  
**LIZ K. GOSNELL, TRUST AGENT**  
**2335 EAST COLORADO BOULEVARD, SUITE 115-123**  
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June 4, 2020

Culver City Oil Sub Committee	sent via email
Mayor Goran Eriksson	<a href="mailto:goran.eriksson@culvercity.org">goran.eriksson@culvercity.org</a>
Vice Mayor Alex Fisch	<a href="mailto:alex.fisch@culvercity.org">alex.fisch@culvercity.org</a>
Council Member Meghan Sahli-Wells	<a href="mailto:meghan.sahli-wells@culvercity.org">meghan.sahli-wells@culvercity.org</a>
Heather S. Baker, Assistant City Attorney	<a href="mailto:heather.baker@culvercity.org">heather.baker@culvercity.org</a>

Dear Sub-Committee Members and Ms. Baker,

On behalf of the Cone Fee Trust, an owner within the Inglewood Oil Field (IOF) and stakeholder in these proceedings, CFT provides preliminary comments as follows. Attorney Charles Moore representing the Vickers Group, the major landowner in the Culver City portion of the Inglewood Oil Field, joins in the comments expressed herein.

First, this meeting and public comment on the self-styled “Amortization Study” has been scheduled without sufficient opportunity to review and respond to the Amortization Study itself. The Amortization Study – a year in the making and consisting of 64 pages of reporting and data – was only released to the public on Friday, May 29, 2020. This meeting is set for just four business days later, a patently insufficient time period to review and digest and generate detailed public comment and rebuttal. Worse, and as Culver City’s Council knows given its myriad public notifications since the end of last week, Culver City has issued multiple, consecutive curfew notices as a result of the protests and civil unrest – circumstances which have been occurring throughout the metropolitan Los Angeles area. Notifying the public that they have a mere four business days – in the middle of a pandemic and while there is civil unrest afoot that is sufficient significance and concern that this Council imposed curfews on its citizens – is per se improper and a violation of the public’s right to a reasonable opportunity to review and comment. Without a postponement of this meeting and extension of the comment period, any action taken by the subcommittee or the Council purporting to adopt the study or its findings or implement any course of action in connection with same will be tainted and improper and give those in opposition yet an additional ground to have a court set aside any such action. As discussed below, the Amortization Study and the course of action the City is considering taking will, if adopted and implemented, result in an unconstitutional taking in violation of the 5<sup>th</sup> Amendment to the United States Constitution and a violation of the due process rights of the public in connection with such meetings and comment periods

In short, under the current circumstances and prudent governance standards, there is no emergency to justify this Amortization Study to be considered or converted into an action plan, regardless how deleterious to the City, its budgets, and its citizens’ best interests. The City has spent more than a



decade – and millions of taxpayer dollars – in one failed or scuttled attempt after another to craft anti-oil measures. However, and highlighting the clear irregularity of the four business day comment period here, at least those prior measures were the subject (for the most part) of substantive public debate and adequate time and notice to review draft reports and proposed action plans. So, why the wholesale deviation from such due process here? The public's interests and right to review and comment upon the Amortization Study over a reasonable period should not be abridged for a certain sector's political expediency. CFT again requests, as it did informally in correspondence to the Mayor and Vice Mayor, that the meeting be adjourned and rescheduled and the public comment period be extended by two weeks, at the very least.

Second, and preliminarily, the financial consequences of the \$400,000+ Amortization Study itself and the action plan it promotes compels that no prudent Councilperson would vote to adopt the Study or any action plan designed to implement an approach to take private property and will generate many years of litigation at even greater cost to the City's taxpayers and diversion of resources from programs that directly benefit the citizens.

By way of background, a review of the City's financial documents (which, in some respects, are deliberately opaque so as to occlude the real dollars spent on these anti-oil (i.e. anti-tax revenue generating) escapades), reveal that approximately \$10 Million of mostly unbudgeted dollars from the near bankrupt City of Culver City continues to be spent while prudent financial management and the concerns of residents, businesses and other stakeholders effected thereby are disregarded. After declaring a fiscal crisis last year, the most recent May 18 and May 19 City Council meetings announced a citywide **budget cut** close to \$100M for the 20/21 budget. Yet, the premise behind the Amortization Study and this subcommittee meeting and proposed action is to find a way to eliminate hundreds of thousands of dollars in tax revenue the City receives from the 78 acres of oil producing land in its jurisdiction, not to mention eliminating jobs and the incidental benefits to local businesses that rely on oil operator employees to buy goods and services. No steward of a City's finances should be recommending the elimination of tax revenue sources at all, much less when the City has a massive budget shortfall and more to follow as a result of the pandemic and its impact on local business and tax receipts. Further, the City has already over-spent on its decades long anti-tax revenue crusade. With just 78 acres of IOF property at issue, the City has spent approximately \$128,000 per acre (\$10M/78 acres) – money that's been doled out to a handful of consultants – to try and end oil production and, quixotically, reduce the City's tax base. Even the Amortization Study expenditures reveal the City's use of taxpayer funds at the rate of \$5,100 per acre (\$400K/78 acres). None of these expenditures have generated new tax revenue for the City or for the benefit of its citizenry. These prior efforts rarely have project lines in the City's annual budget even though the effort to close the Culver City portion of the IOF continues year after year. The City's budget is anything but transparent and an audit of the decade plus of expenditures for these failed endeavors is warranted. Instead of just naming the process, Close the Inglewood Oil Field, each time a different misdirected process begins with a new title, it is paid out of numerous miscellaneous line items from different departments, misleading the City's citizens as to the real purpose and amount of the expenditures. This is not transparency or appropriate governance.



And, should the subcommittee and then Council adopt the Amortization Study and implement any of its action plan to end oil production, the City will then be using (and diverting) several million dollars in taxpayer funds to litigate and continuing to take actions to reduce the tax revenue from the 78 acres, creating an even heftier budget gap for the City. No good cause exists for the City to create an even greater financial burden on its taxpayers and property owners.

Culver City started this decade long unbudgeted multi-million-dollar crusade over the mere 78 acres and failed on at least three different (but expensive) measures to interfere with this tax-generating operation. The ill-advised and ill-fated attempts by the City in this regard, - as evidenced by the latest expensive and deeply flawed Amortization Study – should be stopped today. It is also noteworthy that the City's \$10M+ expense over the past decade was avoidable; yet, inexplicably, the City refused to join Los Angeles County's generous offer to attach the 78 acres within City boundaries (a mere 7% of the total IOF) on to the incredibly successful Los Angeles County's Community Standards District and permit the County to oversee same as it has successfully throughout this period and, of course, at what would have been little or no expense to the City.

The massively negative impacts of adopting and taking any action consistent with the Amortization Study are also matched by the readily apparent flaw in the City's premise for moving forward with the study in the first place. In order to minimize the risk of an unconstitutional taking claim by, for example, the oil operator, the oil operator must be a participant in the process agreeing to same as a method for winding down the operation. ***Without a participant, the completion of any one of these efforts would constitute a taking of the land and result in a lengthy lawsuit in federal court that would cost the city millions of more dollars and very likely result in the City still losing.*** The lone prior amortization study in Goleta, California had the oil operator/landowner's support; that is not the case here.

The City's previous efforts – which also had no Participant - included:

- 1) Culver City attempted a cut and paste from and modify the LA County's Community Standards District (CSD), spent excessive amounts on consultants, had numerous meetings wasting the stakeholders on both sides time and gave up;
- 2) Culver City drafted and never finished the release and review portion on an Environmental Impact Report (EIR), despite several million in consultants' fees and lost time;
- 3) Finally, without a new Culver City General Plan, they tried and failed to complete a Specific Plan that they would questionably "bookmark" but which also diverted extraordinary resources and the time of officials that could have been better spent on measure to improve the business and job base in the City, address homelessness and education and plan for a rainy day pandemic.

Now the Amortization Study, a process that has never been successfully completed without a landowner or operator requesting and participating, is the City's latest windmill to pursue. It was and is a financial boondoggle. This is merely Culver City's most recent attempt to implement an involuntarily taking of the land in the Inglewood Oil Field from its rightful owners – many of whom have owned this property since before the City of Culver City even existed. The continued cost of this battle or the next ill-conceived scheme to perpetuate the draining of City coffers and the loss of essential services to



taxpayers is wholly unjustifiable and reflects the interests of only a small handful who bear an extraordinary bias and animus towards the IOF and the essential service it provides and the owners/stakeholders who have undertaken great strides to protect these valuable resources.

Culver City has a far cheaper and more efficient alternative: Culver City can join LA County's CSD to protect the City and spend these funds, not on the windmills of a failed Amortization Study, but on those services and benefits the citizens need and are subject to the budget cuts arising from the Pandemic. If any councilperson is in favor of transparency, accountability, fiscal responsibility, and the interests of all of its citizens, the Amortization Study and any action thereon should be voted down.

Sincerely,

CONE FEE TRUST

Liz K. Gosnell, Trust Agent

Note: This comment letter exceeds the 4,000-character maximum available through the Ecomment on the Culver City Meeting schedule webpage and WebEx submittal comment submittal space. Per the attached 6.4.20 emails I had with Heather Baker [heather.baker@culvercity.org](mailto:heather.baker@culvercity.org) I requested, "Can you guarantee that longer submissions sent to you via email will be included?? Please let me know what the best step to let people know how to submit larger documents that will have their documents get some sort of a confirmed receipt."

Heather Baker graciously responded, "Yes, they can email me a longer document and it will be included. I will confirm receipt, as I have been doing with several other emails I have received."

McGARRIGLE, KENNEY & ZAMPIELLO, APC

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OUR FILE NUMBER:

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August 13, 2020

**VIA E-MAIL & U.S. MAIL**

Culver City Oil Sub Committee  
Mayor Goran Eriksson  
Vice Mayor Alex Fisch  
Council Member Meghan Sahli-Wells  
Heather S. Baker, Assistant City Attorney

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Re: **Cone Fee Trust And Vickers Group's Objections To Amortization Study**

Dear Sub-Committee Members and Ms. Baker,

On behalf of the Cone Fee Trust, an owner within the Inglewood Oil Field (IOF) and stakeholder in these proceedings, CFT provides preliminary comments as follows. Attorney Charles Moore representing the Vickers Group, the major landowner in the Culver City portion of the Inglewood Oil Field, joins in the comments expressed herein.

First, as an overview, the City has taken no action to transparently disclose to its citizens (a) the total costs associated with its more than decades-long foray to interfere with the rights of the landowners and their oil operator to conduct lawful oil operations on their own property, (b) the actual total costs of the Amortization Study and all ancillary expenses associated therewith (last revealed to be over \$400,000 – which is incredible given the funds needed for essential City services that are being cut in the current budget), (c) the projected cost to the City of implementing any plan to attempt to take the private property of IOF landowners and, further, to litigate any proposed implementation in the courts, and (d) the impact that the City's diversion of its dwindling resources to fight to the landowners to actually reduce revenue to the City while reducing the available resource to support essential services and essential businesses in the midst of the pandemic. Without engaging in a fulsome and forthright disclosure and presentation of the facts regarding the above subjects, these continued informal meetings work to simply increase the financial burden on the City and make unavailable to more



needy programs and measures to actually help the City's citizens in this most trying of times. At the last meeting, one council-member verbally scoffed at the multi-million dollar figure ascribed to the City's 10+ years of myopic efforts to stop oil production on the small strip of acreage; yet, neither the Council or that council-member have provided a white paper to the citizens that discloses the full (or any) history of the City's expenditures and answers the (a) through (d) questions above (that are essential to any good faith and meaningful discussion and analysis).

Highlighting the absence of transparency is the City's budget reference to just over \$1.071M in expenditures generally for claimed IOF related matters, but even that sum is unsubstantiated, devoid of any detail nor contextualized as compared to prior budgets and actual expenditures. Instead of simply scheduling informal meetings, given the pandemic and essential needs of the community, committing resources to the opaque IOF issues (that are not a value-add, but a revenue decreasing activity) and not the needs of the majority of citizens should be the City's focus. Abandoning any course of action that seeks to implement the concepts or recommendations of the so-called "Amortization Study" should be the City's focus if, in fact, the Council intends to act with fiscal prudence and humanitarian concerns.

With just 78 acres of IOF property at issue, the City has spent approximately \$128,000 per acre (\$10M/78 acres) – money that's been doled out to a handful of consultants – to try and end oil production and, quixotically, reduce the City's tax base. Even the Amortization Study expenditures reveal the City's use of taxpayer funds at the rate of \$5,100 per acre (\$400K/78 acres). None of these expenditures have generated new tax revenue for the City or for the benefit of its citizenry.

These prior efforts rarely have project lines in the City's annual budget even though the effort to close the Culver City portion of the IOF continues year after year. The City's budget is anything but transparent and an audit of the decade plus of expenditures for these failed endeavors is warranted. Instead of just naming the process, Close the Inglewood Oil Field, each time a different misdirected process begins with a new title, it is paid out of numerous miscellaneous line items from different departments, misleading the City's citizens as to the real purpose and amount of the expenditures. This is not transparency or appropriate governance. And, should the subcommittee and then Council adopt the Amortization Study and implement any of its action plan to end oil production, the City will then be using (and diverting) several million dollars in taxpayer funds to litigate and continuing to take actions to reduce the tax revenue from the 78 acres, creating an even heftier budget gap for the City.



No good cause exists for the City to create an even greater financial burden on its taxpayers and property owners. Culver City started this decade long unbudgeted multi-million-dollar crusade over the mere 78 acres and failed on at least three different (but expensive) measures to interfere with this tax-generating operation. The ill-advised and ill-fated attempts by the City in this regard, - as evidenced by the latest expensive and deeply flawed Amortization Study – should be stopped today. It is also noteworthy that the City's \$10M+ expense over the past decade was avoidable; yet, inexplicably, the City refused to join Los Angeles County's generous offer to attach the 78 acres within City boundaries (a mere 7% of the total IOF) on to the incredibly successful Los Angeles County's Community Standards District and permit the County to oversee same as it has successfully throughout this period and, of course, at what would have been little or no expense to the City.

In order to minimize the risk of an unconstitutional taking claim by, for example, the oil operator, the oil operator must be a participant in the process agreeing to same as a method for winding down the operation. Without a participant, the completion of any one of these efforts would constitute a taking of the land and result in a lengthy lawsuit in federal court that would cost the city millions of more dollars and very likely result in the City still losing. The lone prior amortization study in Goleta, California had the oil operator/landowner's support; that is not the case here.

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Very truly yours,



Patrick C. McGarrigle of  
MCGARRIGLE, KENNEY & ZAMPIELLO, APC  
8597-001\ltr\Culver City – Amortization Objection 8-13-2020