

**Freeport-McMoRan Oil Gas  
Inglewood Oil Field  
2014 Environmental Quality Assurance Program (EQAP) Report**

<b>CSD Section/ Plan</b>	<b>CSD Language</b>	<b>Compliance Description</b>
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 or 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, 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 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 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.
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 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>
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 re-drilling 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	<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>
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>	<p>Documentation made available to the CAP is posted on the Inglewood Oil Field website required/described in J.2.c.</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 2014 annual meeting was held on 11/18/2014.</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 sixth edition of the newsletter was mailed out and posted on 10/20/14.</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>

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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.