



# Los Angeles County Department of Regional Planning

*Planning for the Challenges Ahead*



Richard J. Bruckner  
Director

August 26, 2015

TO: Gina Natoli

FROM: Timothy Stapleton  
Zoning Enforcement West Section

**SUBJECT: Periodic review of the Baldwin Hills Community Standards District  
Project No. R2015-02225  
RADV No. T201500005  
Public Meeting: September 10, 2015  
Agenda Item: 2**

On October 28, 2008, the Los Angeles County Board of Supervisors adopted the Baldwin Hills Community Standards District ("CSD") which established additional development standards and operating procedures for the oil and gas production operations within the unincorporated areas of the Inglewood Oil Field, as listed under the Los Angeles County Zoning Code section 22.44.142. The main purpose of the CSD is to ensure that operations are conducted in a safe manner with minimum impacts to the surrounding communities to protect the comfort, health, safety, and general welfare of these communities. As part of the requirements of the CSD, a Periodic Review, as described under section 22.44.142(G.7) must be conducted at least every five years to determine if the CSD's provisions are protecting the health, safety, and general welfare of the public.

Pursuant to Section 22.44.142(G.7) of the Los Angeles County Zoning Code, the County conducted a comprehensive review of the provisions of the CSD to determine if these provisions are adequately protecting the health, safety, and general welfare (for the period between October 2008 to December 2013) of the public in the surrounding area and prepared a draft report regarding the review. The Administrative Final Draft Periodic Review analyzes each section of the CSD and provides a summary of complaints and issues raised by the public, an analysis of compliance and effectiveness, an analysis on new technology, and recommendations for implementation strategy and CSD language changes. Public comments are summarized under Appendix A of the Administrative Final Draft Periodic Review and written comments on the previous draft are attached to this memo (written comments have not been received on the final draft). This public meeting is being held pursuant to section 22.44.142(G.7. a) of the CSD.

The initial review began on April 25, 2013, with a presentation to the CSD's Community Advisory Panel ("CAP") in compliance with section 22.44.142(G.7.c). This presentation was followed by an electronic survey to solicit public comments for the draft of the Periodic Review in compliance with section 22.44.142(G.7.a). Public comments were also taken for the draft at the following CAP on May 23, 2013.

An Administrative Draft Periodic Review, incorporating the aforementioned comments, was released on February 20, 2014 to the CAP and the public for review and comment with a 60-day review period in compliance with section 22.44.142(G.7.a). The analysis reviewed a variety of compliance records and plans to determine the effectiveness of the CSD in protecting the health, safety, and general welfare of the public. A presentation on the Administrative Draft Periodic Review was made during the February 27, 2014 CAP meeting. This presentation discussed eleven recommendations for strengthening current implementation procedures of the CSD that included sections 22.44.142(E.4.e); (E.10); (E.15.a); (E.19); (E.20); (E.26.c.x); (E.28.b); (F.3); (F.4); (J.1.a); and (J.2.a). No modification to the current language of the CSD was recommended. Comments were received on the Administrative Draft Periodic Review.

The Administrative Final Draft Periodic Review, addressing comments received on the 2014 Administrative Draft, was released to the public on June 25, 2015. The report's results document that the provisions of the CSD have been effective and adequate to protect the health, safety, and general welfare of the public. The document lists ten recommendations for strengthening current implementation procedures of the CSD for sections 22.44.142(E.10); (E.15.a); (E.19); E.20); (E.26.c.x); (E.28.b); (F.3); (F.4); (J.1.a); and (J.2.a). The recommendation for 22.44.142(E.4.e), as indicated on the previous draft, was removed because the operator added an additional survey marker within proximity of the affected survey marker in 2014. No modification to the current language of the CSD is recommended.

The Administrative Final Draft Periodic Review includes brief descriptions of the public comments received and responses to comments pursuant with section 22.44.142(G.7.a). The Administrative Final Draft Periodic Review includes a comprehensive analysis of the effectiveness of the CSD, reviewed and considered enforcement activity, operational records, and other issues related to oil field operations pursuant with section 22.44.142(G.7.a). The Administrative Final Draft Periodic Review includes a discussion of new technology, if applicable, in the analysis of each section of the CSD pursuant with section 22.44.142(G.7). A presentation of the Administrative Final Draft Periodic Review was made during the July 23, 2015 CAP meeting.

If you need further information, please contact Timothy Stapleton at (213) 974-6453 or [tstapleton@planning.lacounty.gov](mailto:tstapleton@planning.lacounty.gov). Department office hours are Monday through Thursday from 7:00 a.m. to 6:00 p.m. The Department is closed on Fridays.

JDLR:JL:ts

Enclosure(s):

## Baldwin Hills Conservancy

5120 West Goldleaf Circle, Suite 290

Los Angeles, CA 90056

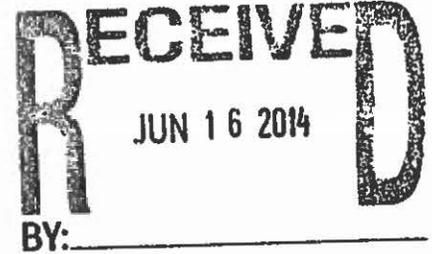
Ph: (323) 290-5270

Fx: (323) 290-5276

www.bhc.ca.gov

June 6, 2014

(Sent via USPS & email: [tstapleton@planning.lacounty.gov](mailto:tstapleton@planning.lacounty.gov))



Mr. Richard Bruckner, Director  
Los Angeles County Department of Regional Planning  
320 W. Temple Street,  
Los Angeles, CA 90012

Re: Baldwin Hills Community Standards District Periodic Review

Dear Director Bruckner:

I am writing to contribute to the overall strengthening of the Baldwin Hills Community Standards District (CSD), and to improve the methods by which the County can collaborate with the oil field operator, community members, and the regulatory agencies involved in protecting the well-being of those who live, work, and recreate in the region.

Over the past five years, the CSD's implementation has generated some important improvements, from the utilization of the California Air Resources Board certified diesel catalysts to reduce emissions from drilling rigs by up to 90%, to a mandatory habitat restoration plan that replaces native coastal sage scrub and other sensitive habitat areas lost to new construction. These are indeed milestones worth noting. Unfortunately, many provisions such as the Odor Minimization Plan have fallen short of their intent, resulting in consistent odors associated with land treatment units in close proximity to recreation facilities. While the language in the ordinance puts forth a series of thoughtful objectives, the successful implementation of those objectives is where the substance of the policy takes place. During the review process, it is imperative the Department of Regional Planning give serious consideration to sound input from area stakeholders with an interest in the future of the region. Many of us have participated in the Community Advisory Panel (CAP), and are intimately familiar with the ordinance's limitations and potential. The purpose of the comments below is to add to the collective goal of moving closer to an effective ordinance that continues to improve day-to-day conditions for those impacted by the oil field operations.

### Data Collection and Analysis

The CSD has mandated several studies at a cost to the County and the operator. A continual theme resonating as a result of the studies is the need for objectivity and transparency to better inform the public and the operator on issues concerning ground movement, health, air quality, and ultimately planning. For studies that are of a critical public nature, it is recommended they are conducted by consultants selected by the County and paid for by the County using funds provided by the operator. If a peer review is desired, the peer reviewer should be selected by the County and paid for by the operator. Methodologies for research and modeling should be developed in a collaborative manner to produce quantitative data that can improve the collective knowledge base.

E.4 Geotechnical, (e) Ground Movement: The Ground Movement Survey frequency should be increased to a semi-annual basis, and analysis should be coordinated with established geological survey agencies. Currently, the survey period for the CSD is one year with data collection taking place during the calendar year beginning in January and concluding in January the following year. Analysis of the data collected during the calendar year has been delivered in a report typically submitted in August, approximately eight months later. By increasing the frequency of the analysis to twice a year, there would be more opportunities to re-evaluate the granularity of data needed to assess trends, and/or provide earlier intervention against elevation changes that might be detrimental to surface infrastructure. There is precedent for semi-annual analysis as established by the City of Long Beach with their Subsidence Control Division for the Wilmington Oil Field.

E.7 Biological Resources, (d) Pre-Construction Surveys: All surveys listed under section (d) are currently conducted exclusively in sensitive habitat areas targeted for construction. The sensitive plant and wildlife species identified in the CSD Special Status Species and Habitat Protection Plan should all be surveyed in the coming year for a baseline of data regardless of construction. Advance survey work in all the habitat areas would allow for a more comprehensive restoration and revegetation plan that can address future projects that benefit both the operator and the environment i.e., slope stabilization, erosion control, storm-water management, and greenhouse gas reduction. The baseline survey data would have no impact on future construction or development in habitat areas due to the fact construction is allowed in sensitive habitat areas under the terms of the CSD.

E.18 Water Management Plan: The implementation and use of new technology can help reduce consumption and achieve better water use efficiency. Smart irrigation systems, solar powered timers, recycled water (purple pipe), are all opportunities to conserve water throughout Southwest L.A. County and should be included in the implementation effort. As drought conditions continue in California, investment in innovative systems will lead to cost savings as well as a more reliable water supply. The infrastructure for delivering recycled water to the Baldwin Hills area is approximately one mile away. Federal, State, and County resources should be leveraged to develop a plan in conjunction with area stakeholders and the operator to deliver reclaimed water to the region.

E.19 Groundwater Monitoring: The recommendation for a network of up gradient wells to be installed in or around the oil field's perimeter to complement the existing groundwater monitoring wells should be a part of the CSD implementation. This request for additional locations should be put forth to make the ground monitoring program acceptable by the director, in addition to being consistent with the Regional Water Quality Control Board recommendation. It is also recommended the County consider adopting future State Water Board criteria for oil field groundwater monitoring networks that are to be put in place when well stimulation activities are used in the field. The more data is made available at various locations of the water table, the better the understanding of the characteristics of ground water in the area.

#### Management of Odors, Waste and Dust

E.2 Air Quality and Public Health, (g) Odor Suppressant for Bioremediation Farms: The implementation of the current odor suppressant program did not achieve the stated objective of insuring no odors from operations could be detected at the outer CSD boundary. A revised strategy that either improved the odor suppressant process from start to finish, or relocated the bioremediation farms to more remote areas, is recommended to achieve the ordinance's objective. In 2012, prior to the SCAQMD Notice of Violation, hydrocarbon impacted soil delivered to the bioremediation farms at LAI (N) and LAI (S) had generated strong odors during handling.

Specifically, odors had been reported by park users and staff during soil removal from truck beds and spreading activities at a land treatment unit adjacent to the parklands. These odors impact recreation facilities outside the outer CSD boundaries including Kenneth Hahn State Recreation Area's Eastern Ridgeline and the Yvonne B. Burke Sports Complex.

E.11 Oil Field Waste Removal, (c) Waste Discharge: The implementation of the best practices developed to manage waste from drilling and reworking in metal or plastic bins should be acknowledged by reference as a guideline requirement. Based on the operator's current practice of containment of all waste from drilling, re-drilling and reworking activities in bins, there is no need for leaving the option for use of ground sumps or pits.

E.11 Oil Field Waste Removal, (p) Fugitive Dust Control Plan: The Fugitive Dust Plan approved by the director in 2009 should include additional measures to address mud after a rain event. A revised program that reduces the amount of moist soil leaving the oil field would lower the impacts on busy routes of travel i.e., Fairfax Avenue and Stocker Street. More frequent street cleaning along those routes during the dry days when the remnant soil dries.

#### Communication and Coordination

G.8 Multiple Agency Coordination Committee: Direct public communication with the entire MACC should take place at least one time per year in addition to the annual reporting. Over the course of the CSD, individual agencies participating in the MACC have presented at CAP meetings. These presentations have been informative and should continue; however, the opportunity to have a discussion with the multiple agencies that have cross jurisdictional authorities would provide the best possible forum to learn how the regulators and first responders work together.

J.1 Community Advisory Panel (CAP), (a) CAP Members: The CAP should be reconstituted to include more representative appointees and an expedited member replacement process on an as needed basis. The CAP's effectiveness has suffered due to the lack of attendance by its members and few appointments being made by the director in a timely manner. Representatives for landowners, neighborhood associations and at-large community members with an interest in serving should have a clear path to nomination with a timely vetting and response from the director. Communication at meetings is important to improve awareness of the operations involved in oil drilling. Ongoing education on land rights, drilling procedures, safety protocols, infrastructure upgrades, and environmental quality monitoring activities help foster critical relationships and manifest collaborative outcomes. It is also important to note that outreach is a shared responsibility and is not the sole purpose of the CAP membership. The CAP relies on the Department of Regional Planning for a web presence, distribution of materials, mailings and notifications. More resources should be deployed by the department to utilize the reach of the County to bolster awareness and stakeholder participation.

Thank you for the opportunity to comment on the CSD. The ordinance clearly seeks to create some compatibility between a 90 year old oil field and a growing population of environmentally conscious people. The success of the CSD's implementation rests in the hands of the Department of Regional Planning.

Sincerely,



David McNeill, Executive Officer  
Baldwin Hills Conservancy

Talking Points for May 23, 2013 CAP Meeting re 5-Year CSD Review:

The following are issues the City of Culver City believes need to be addressed as part of the County's 5-Year Review of the Baldwin Hills Community Standards District. This is not comprehensive list of issues, which the City will be submitting to the County during the comment period.

- Fracking: At a minimum, the County should include language prohibiting the process of hydraulic fracturing until DOGGR or the State Legislature adopts comprehensive regulations that will adequately protect the public health and safety and the environment.
- Landscaping: The Landscaping Plan should be revisited; the Oil Field operations are not adequately screened from the Culver City view shed. Culver City commented on this during the CSD process, but very few, if any, plans addressed the impacts on Culver City.
- Funding: The County should take whatever measures are necessary to ensure that adequate funding exists to cover the cost of preparation of accurate and reliable studies (required under the CSD) and the analysis of the studies' findings by appropriate experts in the specific area of study. The City's concern is that the Public Health and Air Quality Studies lacked sufficient funding to produce an accurate and meaningful analysis of these important concerns. Such measures should include the requirement that the Oil Field operator replenish or increase the County's draw down account as necessary in order to fund studies, as well as implementation and enforcement of the County CSD provisions and requirements.
- Public Notice: The County should not rely on the CAP to notify the public of important information regarding the Oil Field operations, including the events and timelines involved in this 5-Year Review of the CSD. It is the County's obligation, not the CAP to ensure the public is fully informed about these matters, and it is insufficient to solely place the information on the County's website.
- Communication: There needs to be better communication to the CAP and the public about the Oil Field operator's compliance and satisfaction of all CSD requirements. This is critical in order to assess the adequacy of the existing CSD regulations.
- Ground Movement Survey: The study has been prepared and concluded that there exists subsidence in the Oil Field. However, the County's staff has not been able to determine whether the subsidence is caused by the Oil Field operations. If necessary to properly analyze the survey, the County should retain a consultant with the expertise to evaluate the survey (which cost can be passed along to the Oil Field operator through the draw down account). In addition, the requirement for the survey to be reviewed by DOGGR has not yet been completed.
- Annual Joint Meeting: The City recommends that the CAP and MACC meet on an annual basis to better communicate with and inform each other and the public about issues relating to the Oil Field operations.
- Emergency Response Review: In consideration of the sensitive nature of the area, including status as a hazardous fire zone, further review should be given to ensure that the best emergency response plans, including notification and evacuation routes, are in place and that individual neighborhoods are informed about such plans.
- New Technology: The CSD should be reviewed to determine whether there is new and improved technology available which will allow the Operator to reduce impacts on the public and environment.

## Timothy Stapleton

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**From:** henryheins@sbcglobal.net  
**Sent:** Monday, April 28, 2014 11:19 AM  
**To:** Timothy Stapleton  
**Subject:** Public Comment Baldwin Hills CSD

Department of Regional Planning  
Attn: Timothy Stapleton, Zoning Enforcement West  
320 W. Temple Street,  
Los Angeles, CA 90012

Mr. Stapleton:

This is being submitted in connection with the public comments for the Initial Draft Periodic Review. I am a resident of Baldwin Hills and reside on Don Valdes Drive. I wished to make you aware of the following odor and noise problems my family and I have experienced from the oil field. Complaints were submitted to the AQMD.

1. I usually keep my western facing windows open to take advantage of the evening ocean breeze. On August 27, 2013, at 12:08a.m. my family was subjected to the intrusion of a noxious odor that smelled of diesel exhaust or something similar. A complaint was made with the AQMD.
2. I began keep my windows closed rather than have to worry about subjecting my family to the odor and chemicals. We believed the City of Los Angeles would soon prohibit these activities.
3. On March 16, 2014, at 11:00p.m. the odor was detected again when the windows were left open by a family member. Another complaint was made with the AQMD. I was visited by a representative of the AQMD who noted there were complaints by other residents. I was also told an agreement to limit field activities to daylight hours expired at the beginning of the year.
4. On April 8, 2014, at 10:55p.m. we experienced the same odor and reported the matter to the AQMD who sent an investigator out.

This is adversely impacting our quality of life and needs to stop. You will note the time of each intrusion was at night. I am informed the AQMD inspectors are on until 10:00p.m. It seems the offensive activities occur after that time, either by coincidence or intentionally. Each time these odors intruded our home, there was noise coming from the field that sounded like an airplane taking off. These odors are very offensive and a cause of great concern for me and my family because we do not know what this is or what health hazards are present. We have generally kept our windows closed with the hope the LA City Council will stop these activities altogether. We are sending this to you with the hope some action will be taken to curtail nighttime activities completely and prohibit the use of the odor and noise producing equipment. This was never a problem before the enhanced activities began at the oil field.

Thank you for your attention to this matter. If you have any questions or need further comment please contact me by email or phone at (310) 702-1632.

Henry L. Heins, III

# CONE FEE TRUST

LIZ K. GOSNELL, TRUST AGENT  
2245 E. COLORADO #620  
PASADENA, CA 91107  
626.533.3730  
[4gosnell@charter.net](mailto:4gosnell@charter.net)

Department of Regional Planning  
Attn: Timothy Stapleton, Zoning Enforcement West  
320 W. Temple Street,  
Los Angeles, CA 90012

[tstapleton@planning.lacounty.gov](mailto:tstapleton@planning.lacounty.gov)

Re: CSD Review Comment letter

Dear Mr. Stapleton,

I am writing on behalf of the Cone Fee Trust, one of the owners of land within the Inglewood Oil Field (IOF). The letter constitutes the Cone Fee Trust's response to the request for public comment on the public draft of the CSD review document recently made available.

The Cone Fee Trust supports its operator, Freeport McMoRan Oil & Gas (FMO&G), and its diligent compliance with the CSD. The IOF is the most stringently regulated oil field in the United States. FMO&G (and its predecessor, Plains Exploration) have worked tirelessly to satisfy the CSD's requirements, including agreeing to accept additional requirements (that it was not otherwise obligated to accept) simply to resolve the litigation filed by those who viewed the County's CSD vote as just the first step in the attack on the property rights of the IOF owners and the IOF operator. The Cone Fee Trust certainly believes that recommendations that add even more administrative or operational burdens on IOF operator should be withdrawn from the County's CSD review so that the operator is permitted to operate within the established guidelines in a predictable and economically viable manner.

The Cone Fee Trust requests that the County's CSD comment documents include the affirmation of DOGGR's down hole authority.

Thank you for your consideration of our comments.

Sincerely,

Liz K. Gosnell, Trust Agent  
Cone Fee Trust

## Timothy Stapleton

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**From:** ywatson @dslextreme.com [ywatson@dslextreme.com]  
**Sent:** Monday, April 28, 2014 3:49 PM  
**To:** Timothy Stapleton  
**Subject:** Baldwin Hills CSD 5 Year Review

Mr. Stapleton,

A single meteorological station is inadequate. Additional monitoring stations are needed to adequately cover the entire field and the monitoring equipment should have the sensitivity to handle low wind speeds as well as calm conditions.

Yvonne Watson  
Sierra Club/Angeles Chapter

## Timothy Stapleton

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**From:** David Haake [dhaake@ucla.edu]  
**Sent:** Monday, April 28, 2014 3:42 PM  
**To:** Timothy Stapleton  
**Subject:** Baldwin Hills Community Standards District - 5 Year Initial Draft Periodic Review

April 28, 2014

### Department of Regional Planning

**Attn: Timothy Stapleton, Zoning Enforcement West**

tstapleton@planning.lacounty.gov

320 W. Temple Street, Los Angeles, CA 90012

**Subject:** Baldwin Hills Community Standards District

**RE:** 5-Year Initial Draft Periodic Review

I am a resident of Culver City. As a result, my family and I are at risk of pollution released by the operations at the Inglewood Oil Field. I am writing to express my concerns about the coordination, management and operations of the Baldwin Hills Community Standards District (CSD), which includes a portion of the Inglewood Oil Field. The Department of Regional Planning is the responsible agency within the County for these matters.

The purpose of the five-year review is to improve its protection of the health, safety, general welfare, natural resources and environmental quality, of the field and relevant County areas. I have reviewed the draft recommendation and other available documents and the various directions, comments, and responses. I consider that the following comments/requests clearly require additional measures to be taken to assure a full disclosure of conditions and best neighbor management practices going forward within the context of the Community Standards District and its goals of protection.

The current CSD provisions include the potential need for added, appended, or removed provisions and for ongoing evaluation of proven technological advances that would further reduce impacts of oil operations on neighboring land uses and their incorporation into the provisions of the revised and updated CSD.

I consider the following as a requirement for the updated CSD in order to more fully protect the health, safety, natural resources, and environmental quality of the field, County areas, and other adjacent communities and neighbors.

In terms of Air Resources, a single meteorological station is inadequate for the complex terrain of the Inglewood Oil Field. When odor complaints occur, it would be difficult to determine to source of the odor using this single station. When the wind is calm, there is no relation between wind speed and direction.

The Community Health Risk Assessment was inadequate because it relied on death certificates, a method which under-recognizes cases of cancer.

Another problem is that ground movements have not be correlated with operations of injection and production and pool/field pressures.

I would like to see an incident report for the release of water into the Culver City dog park in September, 2010. The dog park is adjacent to the Inglewood Oil Field. Because of its location, this release of water could be a blowout caused by operations at the oil field. There should be an incident report to help determine the most likely causes of the blowout. Yet, no Incident Report has been provided to CAP, and none known to be submitted to LA County or DOGGR. Causes of blowouts include over-pressurization of abandoned wells. This calls for a comprehensive summary of abandoned wells and forms of abandonment.

Sincerely yours,

David A. Haake, MD

Resident, Culver City

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David A. Haake, MD  
Professor of Medicine, Urology and  
Microbiology, Immunology & Molecular Genetics  
The David Geffen School of Medicine at UCLA

Division of Infectious Diseases, 111F  
VA Greater Los Angeles Healthcare System  
11301 Wilshire Blvd.  
Los Angeles, CA 90073  
Tel 310-268-3814  
Fax 310-268-4928  
Cell 310-237-3447  
Email: dhaake@ucla.edu  
Website: <http://id-ucla.org/faculty/Haake.php>

Please consider a donation to the Susan Kinder Haake Scholarship Fund: Donations support an annual award to recognize the third year student at the UCLA School of Dentistry with the greatest potential to follow in Susan's footsteps and become an outstanding clinician-scientist. Link to the online giving site: <https://giving.ucla.edu/haake>

April 28, 2014

Mr. Timothy Stapleton

Zoning Enforcement West

320 W. Temple Street

Los Angeles, CA 90012

Dear Mr. Stapleton:

I am providing comment with regard to the five year initial periodic draft review as a resident of the County of Los Angeles. As a physician and a neurologist, I would like to take issue with the health survey performed by the LA County Public Health Department. The study consisted of telephone interviews done from 9 AM to 5 PM of residences adjacent to the Inglewood Oil Field. The reason given for performing a telephone survey rather than an internet survey was to compare to previous County surveys, even though an internet survey would have been more cost-effective.

The final report on the Community Health Survey and the Inglewood Oil Field appeared on May 22, 2012, in which Director Jonathan Fielding mentioned that more residents in the Inglewood Oil Field (IOF) reported high blood pressure and obesity than residents in Los Angeles County. The survey pin pointed its own weakness as not being able to make causal links between toxic exposures from the oil field to health effects due to small sample size. The County's Department of Public Health was given a budget of \$ 150,000 to perform a health study. This was more than enough budget to design a study from the outset to assure an adequate sample size to make a statistical analysis to either make correlations or causal effects between toxin(s) and adverse health outcome. Instead, it chose not to determine an adequate sample size from the outset and then blames inadequate sample size for the indeterminate nature of its conclusions.

In the summary paragraph of Dr. Fielding's report, mention is made of "the County of Los Angeles is planning to conduct an Air Quality Monitoring Study in order to assess the health risks from exposure to air contaminants from the Inglewood Oil Field. The specific aims of the Air Quality Monitoring Study are to quantify the toxic air emissions from the Inglewood Oil Field operations and to distinguish the oil field's contribution to the air quality in the surrounding area from other major sources."

As of today's date, we are not aware of any such study and are awaiting such a study to be done.

Sincerely,

Khin Khin Gyi, M.D.

Culver City, CA 90230

Board Member: Citizens Coalition for a Safe Community

Los Angeles Neurological Society

**Timothy Stapleton**

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**From:** Tom Williams [ctwilliams2012@yahoo.com]  
**Sent:** Monday, April 28, 2014 4:26 PM  
**To:** Timothy Stapleton; Paul Ferrazzi; David Haake; Al Sattler  
**Subject:** Baldwin Hills Com.Stds Distr. 2014 Review - Requests for Revisions

**April 28, 2014**

**Department of Regional Planning**

**Attn: Timothy Stapleton, Zoning Enforcement West**

**tstapleton@planning.lacounty.gov**

**320 W. Temple Street, Los Angeles , CA 90012**

**Subject:** Baldwin Hills Community Standards District

**RE:** 5-Years Initial Draft Periodic Review - Requests for Revisions

[I have had troubles attaching this file - I will send as a MSWord file whenever I can get it attached...]

The County of Los Angeles Department of Regional Planning is the responsible agency within the County for the coordination, management and operations of the Baldwin Hills Community Standards District (CSD) which includes a portion of the Inglewood Oil Field and adjacent and nearby unincorporated areas of Los Angeles County.

The CSD ordinance has been in effect for five years and is currently subject to review and revision so as to improve its protection of the health, safety, and the general welfare, including but not limited to natural resources and environmental quality, of the field and relevant County areas.

I(We) have reviewed the draft recommendation and other available documents and the various directions, comments, and responses. I(we) consider that the following comments/requests clearly require additional measures to be taken to assure a full disclosure of conditions and best neighbor management practices going forward within the context of the Community Standards District and its goals of protection.

The current CSD provisions include the potential need for added, appended, or removed provisions and for ongoing evaluation of proven technological advances that would further reduce impacts of oil operations on neighboring land uses and their incorporation into the provisions of the revised and updated CSD.

I(We) consider the following as requirement for the updated CSD in order to more fully protect the health, safety, natural resources, and environmental quality of the field, County areas, and other adjacent communities and neighbors. I(We) have grouped the requests in boarder categories in parallel with the CSD, the FEIR, and the Settlement Agreement but generally focus on both improved factual baselines and improved data collection, assessments, and mitigation measures.

Please Advise as to When the Public Meeting with the Hearing Officer is set

Thank You

Dr. Tom Williams  
Senior Technical Advisor  
Citizens Coalition for a Safe Community  
CoChair, Fracking Oil and Gas Committee, Angeles Chapter, Sierra Club  
ctwilliams2012@yahoo.com, 323-528-9682

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**A. AIR RESOURCES**

A single meteorological station, 34°00'52.00", -118°22'43.30" is located on the top of a 409ft high ridge, 100-300ft above surrounding residences, at distances of 2400-2600ft from any residential areas to west and north and 3800-4200ft to the east and south. 2013 records show 8-17% Calm <1mph - 1.5-4.5hr each day.

2013 audit of the station records was focused entirely on correlations of met. data with LAX (5mi SW) and had nothing to do with conditions in the lower elevation areas within 5000ft of station. Although the elevated location with 30ft aerial pole may provide data with high correlation to those of LAX, but such correlations have little importance to the purpose of the met.station, providing local meteorological conditions influencing the dispersion of the field's odorous gases. The elevated station location does not reflect the more depressed surfaces in the field, e.g., along La Cienega Blvd. and La Brea; similarly the station/Ladera ridge and the Overhill Dr. ridge would disturb any uniform wind flows across the field.

Meteorological records therefore can be expected to be consistent with those of LAX but must also be assumed not to be consistent with the air flows across the field. Air flows within the depressed field have not been measured and cannot be assumed to be consistent across the field, especially during low velocity or calm periods (e.g., <2.0ft/sec, 1.5mph).

As widely known, odorous gases are predominately heavier than air gases which may not disperse in accordance with averaged wind directions especially when winds are <2ft/sec or calm and little turbulence is generated. Dense gas emissions usually are from lower temperature and lower elevation sources. Air modeling for dense gases must use specialized - dense gas models rather than more typical air dispersion models. As the County's review of complaints does not provide wind speeds (only directions), elevations and locations of suspected sources and complaints, any review or vindication cannot be undertaken.

Dismissal of odor complaints because of inconsistency of detection location and wind directions does/did not provide the presume odor emissions locations, wind conditions (especially during calm periods), and the compliant location. Monitoring have not been shown to be consistent with surrounding meteorological conditions although the station wind directions have been used to exclude complaints which do not conform with the wind directions at the station.

No inventory has been provided with locations of potential fixed and permanent facilities and temporary and portable/mobile sources of odorous gases emissions in relationship to the complaints and wind directions.

CSD provisions do not reflect the anticipated differences of wind direction and odor dispersions based upon the Station locations and distances to observed odor complaints given the complex terrain.

The CSD must be revised and provide the following:

1. Short-term, multiple (5-8 stations) sites' monitoring and comparisons of local wind speeds/directions during periods of main station's low wind speed periods (e.g., <3ft/sec) and develop correlations between the higher met.station and local typical expected complaint locations;
2. Identification/inventory of all odorous gas sources within 1000ft of any residential areas;
3. Develop and implement dense gas modeling for all compliant locations as to most probable field sources of odorous gas and for the median and above expected odorous/dense gas sources as to most likely complaint residential areas;
4. Incorporate the time of complaint and expected local wind conditions based on local monitoring for review of most likely sources;
5. Where complaints are repeated within a 500ft radius of a previous complaint, establish a local wind speed and direction station for 7-10 days and add to those data sets developed before;
6. Where complaints appear to be related to some facilities, conduct an emissions inventory, identify any emission sources with >1000ppm volatile gases and >100ppm H<sub>2</sub>S, and remediate the sources.

#### **B. Community Health Risk Assessment (HRA)**

Previous HRA conducted was overly generalized both for area of interests and health conditions. HRA encompassed areas far beyond the potential area of influence of the field emissions and must be revised and reduced to those areas within 1500ft of the surface perimeter of the field or within areas shown by air dispersion and/or dense gas models to have detectible levels of gases from field sources of >1000ppm of volatile hydrocarbon gases or 100ppm of H<sub>2</sub>S or any combination of such gases.

In addition to including field-unaffected areas, the HRA further avoided chronic or current conditions and remissions and focused only on actual cancerous deaths.

The CSD must be revised and provide the following:

1. Revise area of interest as indicated above based on modeling and clear demarcations;
2. Update area of interest based on confirmed complaints with 500ft radius from the complaint location;

3. Review previous information based on modified area of interest;
4. Update medical considerations for the new area of interest;
5. Conduct outreach and interviews as appropriate for the new area of interest.

**C. GROUND MOVEMENTS**

Ground Movements have been identified but were not be correlated with operations of injection and production and pool/field pressures. County presentations indicated inadequate information was available to relate ground movement and field operations. Discussions indicated that the field operations were inadequately documented with the County agencies.

Ground movement monitoring must be continued and upgraded to monthly recordation and directly related to injection for flooding, production, and disposal of fluids volumes and pressures at the bottom of hole or perforated/screened zones of each well and pool.

Based on the above upgrades, ground movements must be located in relationship to the Field's each UIC-AOR (Areas of Reference).

The CSD must be revised and provide the following:

1. Conduct satellite-based lidar ground surface topographical surveys and correlation with bottom of hole pressures in all wells;
2. Compile and monitor 60 days in advance of any ground-surface surveys or monitoring field and pool (Bottom of Hole) pressures beneath the surveyed areas and compile/correlate pressures and ground surface movements related to pressure changes preceding ground surface changes at intervals of 60, 180, and 365 days;
3. Establish First Order Surface Survey Markers for either side (north of and south) of the surface NE-SW rupture and pavement reestablishments on Overhill, about 620ft south of Stocker/Overhill intersection and passing through the NW portion of the adjacent School grounds;
4. Install appropriate three-point subsurface microseismicity sensors in the field about 800feet SSW and WSW of the Stocker/Overhill Intersection as was done for the HF Study in the Field and implement monitoring of these sensors in conjunction with the CalTech seismicity recorder for the Field;
5. Correlate well drilling, completions/stimulations, reworking, plugging, and abandonment

**D. DOG PARK BLOWOUT**

During 2012, an abandoned well experienced a blowout of gases, oil, and waters in the Culver City's "Dog Park" and required closure of the park area and reabandonment of the well. No formal incident report has been accessible from the City, County, PXP (now Freeport McMoRan), and DOGGR.

The CSD must be revised and provide the following:

1. Provide a comprehensive incident report regarding the blowout;
2. Provide thorough evaluation of the abandonment of the original well and causes of failure and all activities related to the re-abandonment;
3. Provide all 2013-2014 documentation and background documents (in digital) for all activities for the affected well, related UIC wells;
4. Provide any documentation for the relevant UIC Areas of Review including the blowout well and requirements and any revisions of the UIC Project for the pools of the affected well;
5. Review of "Lessons Learnt" and field changes in abandonment and operations within the area of reference and within 500 ft of any existing abandoned wells;

**E. CSD - PROPERTIES/LANDS**

Citizens Advisory Panels and attendees appear to be confused and are further confused by various attempted clarifications regarding the area of the field and CSD. The CSD must be revised and handouts be provided for the clear understanding of the area of interest and concern for future considerations.

The CSD must be revised and provide the following (**Digital Layered Files / Hardcopies**):

**1. PROPERTIES**

- 1.1 State and County Jurisdictional boundaries both on the surface and subsurface properties and any other geographical delineation;
- 1.2 Surface Topography and State Delineation of Surface Oil Field;
- 1.3 Surface Properties, Owners, and Long-term Leases, if any;
- 1.4 Subsurface Properties, Owners, and Subsurface Long-term Leases Holders
- 1.5 County Records of All Subsurface Properties and Registered Associated Documents

## **2. STATE JURISDICTIONS**

Subsurface DOGGR Boundaries for

### **2.1 State Field Perimeter**

Delineated Areas, Pools, and Depths

Designated UIC Areas of Reference for Disposal and Injection-Recovery

DOGGR registered leases descriptions and demarcations

## **3. WELL LOCATIONS (All Existing Abandoned, Idled, Plugged, and Active - Producers, Injector, and Disposal Wells)**

### **3.1 Top of Wells**

### **3.2 Collision/Path Maps**

### **3.3 Bottoms of Wells - Measured and True Depths and Pool/Plays**

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## **F. REPORTING NOTICES**

Confusion also appears in the processing at local, county, regional, and state notices, applications, and granted permits; some permits, applications, and notices appear to have inconsistent information and may be contradictory.

The CSD must be revised and provide the following (Compilation and Individual Backup Documentation in Digital formats):

1. DOGGR - All Notices of Intent to Drill, Redrill/Rework, and Abandonment and for "SB4"-Stimulation;  
All Permits to Drill, etc.;;  
All applications for Underground Injection Control Projects and Relevant Permits for such.
2. SCAQMDistr - All Notices and Reporting of 1148.2 Stimulation Activities.
3. LARWQCBrd - All notice and permits to conduct water-related activities and approvals of all NPDES permits.
4. Lease Acquisition - All registrations of leases and any other required County documentations for Field.

## Timothy Stapleton

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**From:** CCSC [800ccsc@gmail.com]  
**Sent:** Monday, April 28, 2014 4:41 PM  
**To:** Timothy Stapleton  
**Subject:** Baldwin Hills Periodic review Comments

April 28, 2014

Department of Regional Planning

Attn: Timothy Stapleton, Zoning Enforcement West

[tstapleton@planning.lacounty.gov](mailto:tstapleton@planning.lacounty.gov) [tstapleton@planning.lacounty.gov](mailto:tstapleton@planning.lacounty.gov)

320 W. Temple Street, Los Angeles, CA 90012

Baldwin Hills Community Standards District (CSD)

5-Years Initial Draft Periodic Review

Below is a list of a few recommendations and corrections to the periodic review draft that should be implemented.

### Recommendations

1.) amendment to J.2.a

FMOG Community Meetings be held on weekends to better enlist and promote community involvement. Current meetings exclude majority of residents and those with children to participate. Proper Outreach is key to a viable discussion vs. exclusion.

2.) Periodic Review Public Draft page 17

#### ACAN SYSTEM

Better notification protocol Need description of area being notified and routes to be taken in event of catastrophe. I live next to FMOG and have never been notified by codeRED vendor since its installation date December 29, 2010. Verification of functionality needs to be verified.

No search can be done on FMOG website and should be made available.

3.) Periodic Review Public Draft page 19

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.

SCAQMD has to be notified immediately as a standard practice.

4.) Periodic Review Public Draft page 20

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

All records need to be retained for the life of operation.

5.) Periodic Review Public Draft page 22

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

1.) Minimum of at least 3 additional meteorological stations are warranted due to:

a.) changing wind patterns are too great to cover a 1,000 acre oil field.

b.) current location of single station is too far away from residents to evaluate any potential impacts to community

c.) breakdown or failure of equipment could mis critical data collection.

d.) Will allow for better health impact evaluation to pinpoint source of exposure.

e.) interruption. Power outages could accompany an incident at the oil field and collection of meteorological data during that time could prove to be important.

6.) Periodic Review Public Draft page 23

p. Fugitive Dust Control Plan

Fugitive dust testing needs to be implemented as a standard monthly precautionary practice because the hazards of SILICA DUST PARTICLES and DIESEL PARTICULATES that are carcinogens have been identified in oil field production to be harmful to workers and residents surrounding oil fields.

These are dangers that are too fine to see by the naked eye.

7.) Periodic Review Public Draft page

Baldwin Hills Community Standards District (CSD) page 24

In October, 2012, in response to an inquiry from a member of the public regarding potential odors from soil being used at the oil field for a slope stabilization project, staff from the SCAQMD inspected the soil with Volatile Organic Compound (VOC) monitoring equipment. The soil in question was determined to be remediated soil from the oil field facility bio-remediation farm; however, the results of the SCAQMD inspection did not detect a significant odor. SCAQMD staff performed follow up sampling at the bio-remediation farm and discovered VOC contaminant levels above the 50 parts per million (ppm) criteria outlined in SCAQMD Rule 1166 and a Notice of Violation (NOV) was issued to the Operator. As a result of the NOV, the operation of the bio-remediation farms at the oil field has been temporarily halted while the Operator installs the modifications and upgrades as required by the NOV.

If the soil came from the BIO farm and all bio farms were in violation how was the soil that was in question not in violation?

Also No mention that this violation is in the prosecutors office or that the soil was unable to be remediated on site safely and had to be incinerated off site.

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

8.) Periodic Review Public Draft page 29

Summary of Issues Raised by the Public:

The overflow of a wash tank that occurred on September 20, 2013 was discussed during a CAP meeting on September 26, 2013. The tank overflowed into the tank overflow line due to a malfunctioned level controller with the amount estimated at 30 barrels of oil with 600 barrels of water. The fluid flowed via a tank overflow pipeline to a second tank, into the second tank overflow line and into a lined secondary containment pit. The oil and water were subsequently removed from the pit and returned to the facility system. Issues raised by the public included testing and maintenance of the level controller, the capacity of the second tank, and why the failed level controller did not shut off oil to the tank before the tank reached an overflow volume. FM O&G and the County reported back at the following CAP meeting on October 24, 2013 that the alarm system for the failed tank controller unit properly notified oil field operations staff and that the secondary containment system was sufficient to prevent the fluid from traveling offsite.

A secondary level controller was recommended as a backup at the CAP meeting as a safeguard to help prevent potential future incidents from contaminating the environment

9.) Periodic Review Public Draft page 35

The 2012 and 2013 ground movement survey reports recommended that one of the historical monuments utilized for the surveys (Monitor Station 50004, Historical Monument Inglewood E-1C) be discontinued due to problems with the station which may be affected by a tree root; the reports recommend that the station be moved or that another station be installed nearby. This situation has been discussed at Community Advisory Panel (CAP) meetings with comments concerned as to whether the movement of the survey point was due to the tree root or actual ground movement. Discussion at the October 2013 CAP meeting included a request by a member of the public that the existing station remains as data point and that an additional station be installed nearby.

This recommendation was by a CAP member

10.) Periodic Review Public Draft page 36

Ground movement surveys have been completed annually as required pursuant to the Accumulated Ground Movement Plan approved by County Public Works on November 10, 2009 and DOGGR on November 30, 2009. The surveys are completed using Global Positioning (GPS), Geodetic Leveling DifSAR processes and procedures as documented in the Ground Movement Monitoring Plan as approved by DRP and DOGGR. Baseline survey reports were submitted in January 2011 with revisions in March and October 2012. Annual survey reports were submitted July 2012 with revisions in October 2012 and September 2013 to DOGGR and the County Public Works Department as required, the reports are available on the Inglewood Oil Field web site at <http://www.inglewoodoilfield.com>.

Results of the ground movement surveys for 2011 and 2012 have indicated subsidence equal or greater than 0.6 inches which triggers the requirement to investigate complaints of subsidence damage from the public. In 2011, 17 damage claims were investigated and 3 claims were followed up on in 2012. Reports were prepared on the subsidence claims and submitted to County Public Works for review; none of the reports concluded that the reported damage was caused by the oil field. One claim, in the Windsor Hills School area and originally initiated in July 2012, continues to be investigated. The July 2012 complaint was followed up with the required geotechnical investigation and reviewed by Public Works. Public Works, in a letter dated September 25, 2012, requested additional data from the oil field operator (PXP at the time) to assist in review of potential causes of the subsidence in the Windsor School area. PXP provided additional information to Public Works on November 9, 2012 and the data was forwarded to DOGGR for review. DOGGR staff concluded that, due to the complex geology and subsidence history of the area, additional ground movement survey data is required to make a determination on the oil field operations potential impact to ground movement in the Windsor Hills School area.

More than one claim is being investigated.

Dogger is still investigating and needs more info from FMOG about the faults block movement.

It should be noted that the County Geologist Mr. Montgomery stated at a CAP meeting he does not have the expertise to make a determination if the withdrawal and reinjection of fluids into the reservoirs is causing the uplift and subsidence in and to the surrounding community causing the damage.

11.) Periodic Review Public Draft page 38

Based on the recommendations contained in the 2012 and 2013 ground movement survey reports, it is recommended that an additional monitoring station be installed near the monument (Monitor Station 50004, Historical Monument Inglewood E-1C) that may be affected by movement from a tree root.

Recommended at a CAP meeting both the new and historical monuments be used to evaluate ground movement disparity.

12.) Periodic Review Public Draft page 40

Summary of Issues Raised by the Public:

Noise from the oil field was discussed in detail at the Community Advisory Panel (CAP) meeting on October 25, 2012 where staff from the Public Health Department made a presentation on the noise monitoring activities conducted by the County. The Public Health Department performs sampling at various locations within the surrounding communities at random dates and times of day. The presentation concluded that the dominant source of noise in the area of the oil field is traffic for both daytime and nighttime periods. Input from the public at the meeting included requests for more monitoring, more monitoring locations, monitor locations closer to residences, and discussions of specific noise complaints such as banging of pipes.

Input on potential noise from the oil field was also received by the County in comments solicited for the periodic review. The comments were raised at the CAP meeting on May 23, 2013. Members of the public identified oil field noise as coming from banging, unloading of trucks, jackhammers, low decibel underground drilling noises, some type of alarm noise in early morning hours and constant rumblings after 10pm. The public also noted a lack of noise barriers at work over drill rig sites.

Oil field noise was a discussion issue of the Settlement Agreement dated July 15, 2011 negotiated between concerned public parties, the County and PXP (now FM O&G). The agreement revised the CSD with regards to allowable nighttime maximum noise levels and baseline monitoring locations. The agreement lowered the nighttime (10pm to 7am) maximum noise level above the baseline value from the 5 dBA referenced in this provision to 3 dBA for drilling, redrilling, and reworking

activities. The agreement also stipulated that if those operations elevate nighttime baseline noise levels by more than 10dBA for more than 15 minutes in any one hour, the source of the noise must be identified and steps implemented to avoid such a noise elevation in the future.

Recommend Peak level monitoring be used as a compliance requirement rather than averaging overall ambient noise levels. Example of disturbance is if you are at rest/sleep and someone comes up you and pops a balloon how is it that this didn't happen. Only by averaging peak to average but the damage is done you are awake and startled.

Prime example : Page 42

The County Environmental Quality Assurance Program (EQAP) required by Provision F.1 includes requirements for noise monitoring. As part of the 2010 EQAP audit the County obtained a noise expert to conduct a review of the noise monitoring completed for the revised baseline data at monitoring stations 1 and 2. Monitoring stations 1 and 2 were selected for their proximity to residences in the surrounding community. The effort included review of the baseline monitoring reports, review of the monitoring reports during drilling activities, site visits to the oil field, and additional onsite noise monitoring. The report concluded that no noise exceedances have resulted from drilling, re-drilling, or reworking operations.

Periodic Review Public Draft page 49

The accumulative impact of more rigs and traffic needs to be evaluated for the sensitive habitat and seasonal nesting birds.

13.) Periodic Review Public Draft page 52

Summary of Complaints:

One complaint regarding lighting has been documented since the adoption of the CSD. The complaint was received by the facility 1 800 number at 2053 hours on May 8, 2013 from a Ladera Crest resident regarding bright lights in the northern part of the oil field. The complaint was investigated per the requirements of CSD Provision F.7, Complaints. The cause of the light was determined to be a member of the public using filming equipment approximately one mile north of the resident that called in the complaint. The member of the public conducting the filming activities was notified of the complaint issue.

Lighting complaint was called into the ombudsman at FMOG and also brought up at a CAP meeting because lights shinning into homes from a drill rig in the Windsor Hills Community.

14.) Periodic Review Public Draft page 59

Summary of Issues Raised by the Public:

The County has not noted any issues raised by the public with regard to the facility signage.

Multiple times at CAP meetings the suggestion that Prop 65 signage should be posted in and around facility to notify the public of such hazards especially when entering park that is in the middle of the oil field.

Periodic Review Public Draft page 65

Summary of Complaints:

There have been no complaints regarding the storm-water drainage management plans approved for the oil field.

CAP multiple complaints about toxins allowed to run off into Ballona Creek with rainwater Lead and Mercury etc.etc by both CAP members and public.

15.) Periodic Review Public Draft page 76

Summary of Complaints:

No complaints associated with the hazardous materials business plan for the Inglewood Oil Field have been received by the County.

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

No issues regarding the hazardous materials business plan for the Inglewood Oil Field have been raised by the public. However, questions were raised during the June, 2013 CAP meeting in reference to the relocation of the hazardous materials storage area from near the Operator's office and Labrea Blvd to a more central location within the oil field. The storage area is a staging area for new product (lube oils for equipment), empty drums ready for re-cycling, and hazardous waste (partially empty paint cans and damaged aerosol cans). No additional comments were brought up on this issue.

The storage area containing pallets 55 gallon barrels of toxin chemicals were stored there for decades.

If a spill were to happen at the storage facility what nearby residents will be in the path of a toxic airborne plume?

**16.) Periodic Review Public Draft page 80**

Hydraulic fracture well enhancement techniques are not in use at the oil field at this time nor are they proposed in the recently approved 2014 Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan. In addition, the Operator has committed to providing advance notice of any potential future hydraulic fracturing that could occur at the field.

False statement above:

High rate gravel packing is a form of Fracking and the industry also recognizes it as such. MRS consultant Pearson at public meeting even stated it as so. This has been brought up multiple times at CAP meetings.

**17.) Periodic Review Public Draft page 81**

The 2011 Plan comments also requested more detail on the location and schedule of the proposed wells. Concern from the public was documented on the potential for the over concentration of wells in one area and the associated noise and visual impacts. Both the County and the public requested that the plan reflect and discuss complaints from the public and the results of the investigation of those complaints. The public also expressed concerns that both the rate of abandonment of wells and the progress of the landscaping effort were not meeting the requirements of the CSD. The public noted the similar concern that the application and installation of the new flare for the gas plant was not consistent with the schedule required by the CSD. The review and subsequent approval of the 2011 plan confirmed Operator compliance with the progress of those CSD provisions.

Comments on the 2012 Plan made similar requests as those on the previous drilling plans for consolidation of wells in the center of the oil field and abandonment of more wells with the focus on the perimeter sections of the field. In response to these requests, the County noted that the CSD does not require the Operator to "shrink" the oil field operations into the center of the field and that the proposed drilling locations were in compliance with the CSD. Comments were also noted that the proposed number of wells and request for bonus wells was not adequately documented, however, the County determined the information in the plan was consistent with the applicable CSD requirements. The public also requested more information on the geological review of the drilling plan, production zone information, and data on the nodular shale zones. The County requested the information where required by the CSD, however, much of the requested information is not required by the ordinance. Other comments requested that the gas buster/flare system be required for all drilling sites and concerns regarding hydraulic fracturing well enhancement techniques.

typos

**18.) Periodic Review Public Draft page 87**

**Summary of Complaints:**

The County has received complaints regarding noise associated with rig operations at the oil field. The most common complaint is the noise from pipe sections banging against each other. The exact number of noise complaints directly linked to well reworking operations is not clear, but most of the complaints from pipe banging noise has been determined to be from maintenance rig operation. Review of the complaint logs indicates three noise complaints associated with well reworking operations with one confirmed and two unconfirmed.

There seems to be an issue with the complaint log again or the person/s confirming such issues.

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

In addition to the noise complaints associated with the operation of rigs at the oil field, the public has also noted the observation of too many rigs in one area, which resulted in two public complaints in 2013. This issue has been raised by the public at Community Advisory Panel (CAP) meetings, however, there is no specific CSD condition requiring that rig operations associated with reworking efforts be spread throughout the field to minimize the impact from the rig activities.

It was seven rigs and maybe there should be.

Accumulative impacts to the community

Air

Noise

Aesthetics

Maintenance and work-over rigs should be required to held to the same standard if not higher than drill rigs.

19.) Periodic Review Public Draft page 93

Recommendations to Changes in Implementation:

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

Recommendations to Changes in CSD Language:

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

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.

All leaks and testing results should be reported to SCAQMD

20.) Periodic Review Public Draft page 94

In 2009, 96 soil samples were taken at a depth of four feet with the samples analyzed for hydrocarbons and hydrogen sulfide. The results indicated that all areas where

hydrocarbons were detected had values below regulatory concerns. Hydrogen sulfide was not detected in any of the soil samples. The testing in 2010 included 96 soil samples for hydrocarbons and hydrogen sulfide; none of the 2010 soil samples contained hydrocarbons above regulatory thresholds and hydrogen sulfide was not detected. Additional sampling occurred in 2010 at the location of the 12 highest results for hydrocarbons; surface air testing for methane was completed using an organic vapor analyzer, methane was not detected at any of the 12 air sampling locations. For the 2011 sampling program 31 soil samples were taken with no results above any regulatory threshold of concern for hydrocarbons and hydrogen sulfide was not detected. The 2012 well area hydrocarbon sampling program included 24 soil samples with the highest result measured significantly below the levels of possible concern. Consistent with previous year sampling, hydrogen sulfide was not detected.

The annual abandoned well area hydrocarbon vapor testing program to date has concluded that there is no evidence of leaking wells, pipelines or natural seepage. The reports further conclude that the low levels of hydrocarbons detected are likely the result of natural degradation of crude oil in the near surface soil resulting from historic oil operations. The Annual Abandoned Well Testing reports are available at the Inglewood Oil Field web site at <http://www.inglewoodoilfield.com>.

If Im' not mistaken the SCAQMD Blue Sky Testing reported that they checked 10% of the field and found that 10% was leaking.

NOTE: Not all abandoned well have been found to even determine if they are leaking or not.

21.) Periodic Review Public Draft page 104

Summary of Issues Raised by the Public:

The County received input on the ECC in comments solicited for the periodic review. A member of the public commented that employment of the ECC by a consultant to the County is a conflict of interest and the ECC should be an independent hire. The comment is unclear; however, the ECC is hired directly by the County as part of a tri-party agreement with the Operator and acts independently from the Operator. While the Operator is required to pay for the costs of the ECC, the ECC reports directly to the County thereby avoiding any potential conflict of interest.

It was a CAP member and this needs to be clarified.

22.) Periodic Review Public Draft page 107

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

Maintenance frequency of oil field equipment was discussed at the September and October 2013 Community Advisory Panel (CAP) meetings with regards to the overflow of a tank from a failed level controller. Members of the public requested additional information on why the controller failed, how the incident was responded to by oil field staff, and questioned the operator about redundant equipment or other measures that could be implemented to prevent equipment failures of this type in the future. The

equipment in question was part of the inspection and maintenance program required by subsection F.3.a.ii of this provision. While the piece of equipment failed, it had been inspected as part of the maintenance program. The program provides for sufficient inspection and maintenance of equipment, but does not completely ensure against potential malfunctions that could occur to various pieces of equipment. The program; however, allows for a feedback loop to alert the Operator to additionally check equipment that has had the propensity for failure.

Cap member requested a backup or secondary valve to be installed to control or stop the overflow to the secondary tank that had failed.

**23.) Periodic Review Public Draft page 108**

**Analysis of Compliance and Effectiveness:**

The provision requires that the County Department of Public Health use an independent qualified acoustical engineer for noise monitoring if deemed necessary. As discussed in the analysis for the noise attenuation provision, no exceedances of the noise regulations in the County Code or of the noise limits specified subsection E 5 a of the

CSD have been recorded. Therefore, the County has not determined that the additional noise monitoring required by this provision to be necessary.

The provision has not been activated to date and no further analysis is recommended.

**Peak noise monitoring required as averaging of noise skews results of exceedances.**

**23.) Periodic Review Public Draft page 115**

**Analysis of Compliance and Effectiveness:**

As noted in the discussion for CSD Provision G.1, PXP, and now FM O&G, have made timely payments on all CSD monitoring and enforcement costs. These payments have been made via the draw-down account as required by this provision. The draw-down account has been maintained at or above the \$50,000 balance as required by this requirement since the adoption of the CSD. The County has not required an increase of the minimum balance of the draw-down account to date.

FMOG maintaining a reasonable balance held in a fund by the County to cover any studies deemed necessary or appropriate to ensure the health and safety of the community and any possible accidents not covered by insurance.

**24.) Periodic Review Public Draft page 106**

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

Maintenance frequency of oil field equipment was discussed at the September and October 2013 Community Advisory Panel (CAP) meetings with regards to the overflow of a tank from a failed level controller. Members of the public requested additional information on why the controller failed, how the incident was responded to by oil field staff, and questioned the operator about redundant equipment or other measures that could be implemented to prevent equipment failures of this type in the future.

Also members of the CAP requested additional info on the failure of the controller.

**25.) Periodic Review Public Draft page 116**

#### G.4 Insurance Requirements.

##### Summary of Complaints:

This provision is administrative in its intent requiring an insurance policy for operation of the oil field; the County has not received any complaints from the public on the insurance requirement except as discussed below.

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

Input on both the insurance liability monetary amount and the amount of the performance security bond required by CSD Provision G.5 was received by the County in comments solicited for the periodic review. Three letters and one comment received at the CAP meeting on May 23, 2013 expressed concerns by the public on the amounts of liability insurance and bonding required by the CSD

Conflicting statements in summary of complaint vs. summary of issues raised: County did receive comments regarding insufficient liability insurance

County is present at all CAP meetings and should be recording all issues raised on this and all others.

Gary Gless

CAP member

CCSC President



# CITY OF CULVER CITY

9770 CULVER BOULEVARD  
CULVER CITY, CALIFORNIA 90232-0507  
CITY HALL Tel. (310) 253-6000  
FAX (310) 253-6010

JEFFREY COOPER  
MAYOR

MEGHAN SAHLI-WELLS  
VICE MAYOR

COUNCILMEMBERS  
JIM B. CLARKE  
MICHEÁL O'LEARY  
ANDREW WEISSMAN

April 28, 2014

Los Angeles County  
Department of Regional Planning  
Attn: Timothy Stapleton, Zoning Enforcement West  
320 W. Temple Street,  
Los Angeles, CA 90012

**Subject: Comments on the Initial Draft Periodic Review for the Baldwin Hills Community Standards District, dated February 2014**

Dear Mr. Stapleton:

As you are aware, the Inglewood Oil Field ("Oil Field") is located within and adjacent to the City of Culver City ("City") and the County of Los Angeles ("County"). As such, thousands of City residents and businesses have been impacted by and are interested in the on-going operations of the Oil Field. As you are also aware, the City has been interested in matters pertaining to the Community Standards District ("CSD") since its inception.

On May 23, 2013, at the meeting of the Citizens Advisory Panel ("CAP"), the County of Los Angeles presented an overview of the required 5-Year Periodic Review Process of the Baldwin Hills Community Standards District. At that meeting, the City submitted comments regarding issues it believed needed to be addressed as part of the 5-Year Review. In February 2014, the County issued its Public Draft of the Baldwin Hills Community Standards District Periodic Review Report ("Report").

The City fully supports and concurs with the comment letter, dated April 28, 2014, submitted by Community Health Councils, Natural Resources Defense Council, the City Project, and Mujeres de la Tierra; and comments submitted by John Kuechle, via email and letter on April 6, 2014; and the comment letter submitted by Kenneth Kutcher on April 25, 2014. The City hereby incorporates these comments by reference, in this letter. In addition, the City provides the following supplemental comments on the Report:

1) Well Stimulation:

The CSD does not contain regulations specific to well stimulation methods, including hydraulic fracturing, acidization and gravel packing. However, the City believes that it is important for the County to address impacts from the use of well stimulation in the Oil Field. Although the Report states that "hydraulic fracturing is not in use at the Oil Field save for the wells 'fracked' for the

Hydraulic Fracturing Study," the City has significant concerns that the Oil Field Operator may determine it wants to use hydraulic fracturing and other well stimulation techniques in the future. Therefore, the City requests that, at a minimum, the County should prohibit the process of well stimulation, until DOGGR or the State Legislature adopts comprehensive regulations that will adequately protect the public health and safety and the environment. Included in those protections should be a well stimulation monitoring program and an adequate community public notification process.

2) Landscaping:

In 2009 and 2010, the City submitted comments on the CSD Landscaping Plans. (Attachments 1 and 2) The City believes that those Plans did not adequately address the aesthetic impacts of the Oil Field operations for the portion of the Oil Field that is adjacent to Culver City. The Report mentions the City's comments about the lack of adequate screening from the City's view shed (Page 54). However, the Report states that the landscaping provisions in the CSD and Settlement Agreement are considered to be fully effective at this time, and no further analysis is recommended. While the approved plans are being implemented, the City continues to assert that the Mia Lehrer Plans do not meet the intent of CSD Environmental Impact Report Mitigation Measures, as discussed in the attached letters. Specifically, measures need to be taken to ensure that the landscaping meets the intent "to beautify and screen the operations from adjoining residential, recreational, institutional areas or adjacent public streets or highways," as stated in Mitigation Measure V.1-1. Very few, if any, plans address the view shed from the City of the impacts of the Oil Field operations.

The City repeats its request made in the December 15, 2010, letter (Attachment No. 2) to meet with the Oil Field Operator and the County to tour the boundaries of the Oil Field to identify the City's areas of concern, understand the Operator's constraints, and discuss possible solutions for mitigating the view impacts of the Oil Field operation on the City and adjacent communities.

3) Funding:

The City's concern is that many of the studies conducted under the CSD, including the Public Health, Ground Movement, and Air Quality Studies lacked sufficient funding to produce an accurate and meaningful analysis of these important issues. This fact has been publicly commented upon numerous times. Provisions of the Draw-Down Account (G.2) in the CSD, allow the County to use the account "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 Report should require enforcement provisions that state the County may take whatever measures are necessary to ensure that adequate funding exists to cover the cost of preparation of accurate and reliable studies (required under the CSD). This includes requiring the analysis of the studies' findings by appropriate experts in the specific area of study. This has not been sufficiently utilized. The existing studies are inadequate and have lacked satisfactory funding; therefore, they should be enhanced with further detail and methodology to improve their accuracy and confidence in their findings. Measures should include the requirement that the Oil Field Operator replenish or increase the County's Draw Down-Account, as necessary, in order to fund studies, as well as implementation and enforcement of the County CSD provisions and requirements.

4) Public Notice:

The County should not rely on the CAP to notify the public of important information regarding the Oil Field operations, including the events and timelines involved in this 5-Year Review of the CSD. It is the County's obligation, not the CAP's, to ensure the public is fully informed about these matters, and it is insufficient to solely place the information on the County's website. For example, there should be a concentrated effort to establish meaningful methods for maintaining an email list of interested persons and stakeholders for notifications, along with publishing notices in local publications.

5) Ground Movement Survey:

The 2013 Annual Ground Movement Survey has been prepared and concluded that subsidence exists in the Oil Field. However, the County's staff has not been able to determine whether the subsidence is caused by the Oil Field operations. If necessary to properly analyze the survey, the County should retain a consultant with the expertise to evaluate it (which cost can be passed along to the Oil Field operator through the Draw-Down Account).

The Report states DOGGR staff concluded that due to the complex geology and subsidence history of the area, additional ground movement survey data is required to make a determination on the possible impact from Oil Field operations on ground movement. They also list a combination of factors that are more likely to have contributed to ground movement and potential property damage than the operations of the Oil Field. At the March 27, 2014 CAP meeting, representatives from DOGGR acknowledged that additional ground movement survey data and studies are needed to more definitely determine the factors causing the observed ground movement. Such data should be provided by the Operator and any further studies should be paid for through the Draw-Down Account.

6) Annual Joint Meeting:

The City recommends that the CAP and Multiple-Agency Coordination Committee (MACC) meet on an annual basis to better communicate with and inform each other and the public about issues relating to the Oil Field operations.

7) Emergency Response Review:

In consideration of the sensitive nature of the area, including status as a hazardous fire zone, further review should be given to ensure that the best emergency response plans, including notification and evacuation routes, are in place and that individual neighborhoods are better informed about such plans. Identification of evacuation locations and routes should be coordinated with Culver City and Los Angeles County Fire Departments.

It is also important to ensure that unannounced drills are conducted periodically at the Oil Field.

8) Greenhouse Gas Emissions:

In 2008, the EIR for the CSD identified almost 160,000 tons of new annual greenhouse gas emissions ("GHGs") that will be created by the Oil Field project (almost 3.2 million tons over the life of the project). At that time, the County failed to adopt a significance threshold and failed to require any mitigation measures. Since that time, significant new information has come to light about the threat from fugitive methane emissions from oil production and processing facilities, as highlighted by the White House's recently released "Climate Action Plan: Strategy to Reduce Methane Emissions." (Methane is at least 21 times more potent than carbon dioxide in causing global warming.) In addition, lead agencies have made significant progress in establishing appropriate significance thresholds for GHGs (e.g. SCAQMD's 12,000 ton CO<sub>2</sub>e threshold for industrial projects). Clearly, GHG emissions from the Oil Field are more than significant and cannot be ignored. The County should consider establishing an accurate inventory of annual GHG emissions from the Oil Field and consider meaningful and effective ways to mitigate those emissions both from stationary sources and fugitive sources.

9) New Technology:

Under the CSD and the Settlement Agreement, the Oil Field Operator is required to consider feasible and available technology that would reduce environmental impacts in connection with the submission of each Annual Drilling Plan. Historically, the Drilling Plan has evaluated the use of natural gas and electric powered drill rigs, but has not addressed in any detail other technology that could reduce environmental impacts. For example, in the 2014 Annual Drilling Plan, the Oil Field Operator states it will use drill rigs with Tier II or better

engines. To the extent drill rigs with Tier III engines are available, which we believe they are, the Oil Field Operator should be required to use those rigs or state why it cannot. As far as we are aware, the County has failed to press the Oil Field Operator to meaningfully evaluate new technologies and require their implementation if feasible and available. The CSD should be reviewed to impose more specific and comprehensive requirements on both the Oil Field Operator and the County to meaningfully evaluate all available and feasible technologies that are capable of reducing environmental impacts. It may be necessary to provide for review by a third party with expertise in the development and feasibility of new technology that can be used in the Oil Field. In addition, during this Periodic Review, the Settlement Agreement requires that the County itself evaluate the use of electric-powered and natural gas powered rigs and if feasible and reasonably available, requires their use for any new rigs acquired or leased by the Oil Field Operator.

**10)Insurance and Bonding:**

Section G.4 of the Report fails to state the amount of insurance coverage or security that is currently required and it does not discuss the biases upon which the amounts were determined. Instead, it states that "no additional coverage amounts are necessary," and that the bond amounts "are appropriate." There should be an explanation of the factors which were considered in setting these amounts, including the potential accident scenarios and potential damages, and the support for the conclusion that the CSD required amounts are adequate for the significant Oil Field operations. The fact that the Oil Field is not necessarily comparable to a drilling operation in the Gulf of Mexico does not provide the necessary assurance that the public and surrounding jurisdictions are adequately protected in the event of an accident. There have already been spills and releases in the Oil Field in the past ten years. A serious accident could have catastrophic impacts, in particular, due to the proximity of the Oil Field to schools, homes, businesses, parks and waterways, which empty into the Santa Monica Bay.

In addition, there is no real analysis in Section G.5, regarding how it was determined that the amount of the bond is appropriate for the levels of operations at the Oil Field. The City requests that the information referenced in Sections G.4 and G.5 be made public. In addition, the City requests that an explanation is given to substantiate the conclusion that the bonding and insurance amounts are adequate to provide the best coverage for potential clean-up costs and the impacts of accidental contamination.

**11)CAP Membership:**

There is very little direction in the CSD regarding the management of the CAP. The City proposes that the County contact any entity whose representative (or alternate) misses more than three meetings within a six month period to inquire if

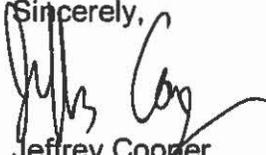
they would like to appoint a different representative(s). This would encourage more active participation and representation, and help the County better achieve the goal of the CAP, which is to "foster communication about ongoing operations at the oil field and to allow the community representatives to provide input to the county and the operator."

As you are aware, the Oil Field is unique in that it is an "urban" oil field adjacent to parks, schools, residences, and businesses. Additionally, there are numerous fault lines running through and adjacent to the Oil Field, including the significant Inglewood-Newport Fault. It is due to these unique circumstances that Culver City makes the above comments, requests and recommendations in order to more effectively achieve the CSD's objectives. The City believes that the recommendations made in the Report to enhance the implementation of the provisions of the CSD have merit, but also, significant additional measures are needed.

To assure compliance with the intent of the CSD, the above recommendations, along with the recommendations contained in the comment letters from Community Health Councils, John Kuechle and Kenneth Kutcher, should be implemented.

If you have any questions or need any additional information, please contact Sherry Jordan, Project Manager, at (310) 253-5746.

Sincerely,



Jeffrey Cooper  
Mayor

cc: The Honorable Mark Ridley-Thomas, Los Angeles County Supervisor  
The Honorable Members of the Los Angeles County Board of Supervisors  
The Honorable Holly J. Mitchell, Member of the State Senate  
The Honorable Sebastian Ridley-Thomas, Member of the State Assembly  
The Honorable Members of the City Council  
John M. Nachbar, City Manager

Attachments: 1. June 26, 2009, letter to Leon Freeman, DRP, commenting on landscaping plan  
2. December 15, 2010, letter to Leon Freeman DRP, commenting on revised landscaping plan



THOMAS GORHAM  
Deputy Community  
Development Director/  
Planning Manager

# Culver CITY

## PLANNING DIVISION

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

(310) 253-5710  
FAX (310) 253-5721  
planning@culvercity.org

December 15, 2010

Via Email, Facsimile & U.S. Mail

Leon Freeman  
Department of Regional Planning  
Zoning Enforcement, Section I  
320 West Temple Street  
Los Angeles, CA 90012

### CULVER CITY COMMENTS ON THE PXP LANDSCAPING PLAN INGLEWOOD OIL FIELD, REVISED NOVEMBER 2010

Dear Mr. Freeman:

We have reviewed the Revised November 2010 Landscaping Plan (Revised Plan) submitted by PXP as required by the Community Standards District (CSD) (L.8., Page 89) and provide the following comments:

1. Throughout the review of the four versions of the CSD, Culver City repeatedly commented that specific measures needed to be taken to ensure that the landscaping meets the intent "to beautify and screen the operations from adjoining residential, recreational, institutional areas or adjacent public streets or highways" of Mitigation Measure V.1-1 of the CSD Environmental Impact Report (EIR). As the Plan only proposes to provide landscaping for three of the four sides of the Inglewood Oil Field (Oil Field), we do not see how it meets the requirements of Mitigation Measures V.1-1 through V.1-3 especially as the plan relates to the views of the oil field operations from Culver City to the west. The City remains disappointed in the lack of landscaping proposed to be installed along the westerly side of the oil field. The Culver City ridgeline is visible for many miles and the oil field operations are seen by Culver City and City of Los Angeles residents and businesses. In PXP's proposed 2009 Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan, dated January 2009, Attachments Nos. 2 through 30 clearly illustrate the view impacts of oil field operations from the west.

2. Although the Revised Plan indicates that it is infeasible for landscaping enhancement in this location, the analysis provided to substantiate these claims is substantially deficient. It would not appear to be cost prohibitive for PXP to install an above-ground drip irrigation system and plant a faster growing indigenous and native

species of trees, such as the eucalyptus, which are well established throughout the Oil Field presently.

3. The Revised Plan must address the required EIR mitigation measures and be consistent with the 2009 (or current) Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan. As such the Revised Plan dated November 2010 is incomplete and insufficient in its attempt to beautify and provide screening of oil well operations for the oil field. The Revised Plan as proposed should be rejected and be required to be modified to address the viewsheds from all sides of the oil field.

4. The use of mature landscaping should be required as it could be many years before visual impacts are abated if small immature landscaping is used.

5. The County should be aware that in an executed agreement, PXP had promised to provide landscaping to shield pumping equipment in Culver City Park over four years ago. PXP has not honored that obligation by claiming that it was not feasible to do so. Thus, the County should have an effective enforcement mechanism to assure that PXP follows through with its landscaping obligations.

To address these comments, the City proposes that PXP meet with City staff to tour the boundaries of the Oil Field to identify the City's areas of concern, understand PXP's constraints and discuss possible solutions for mitigating the view impacts of Oil Field operations on Culver City and adjacent communities.

We look forward to working with the County to achieve the proper landscaping to beautify and screen the oil operations in Baldwin Hills. If you have any questions please contact Sherry Jordan, Senior Planner, at (310) 253-5746 or by email at [sherry.jordan@culvercity.org](mailto:sherry.jordan@culvercity.org).

Sincerely,



Sol Blumenfeld  
Community Development Director

SB:sj

Copy: City Council

John Nachbar, City Manager  
Carol Schwab, City Attorney  
Heather Baker, Assistant City Attorney  
Charles Herbertson, Public Works Director  
Thomas Gorham, Deputy Community Development Director/Planning Manager  
Sherry Jordan, Senior Planner



# CITY OF CULVER CITY

9770 Culver Boulevard, Culver City, California 90232

Sol Blumenfeld  
Community Development Director

310 253-5940  
310 253-5824 Fax

June 26, 2009

Leon Freeman  
Department of Regional Planning  
Zoning Enforcement, Section I  
320 West Temple Street  
Los Angeles, CA 90012

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## CULVER CITY COMMENTS ON THE PXP LANDSCAPING PLAN INGLEWOOD OIL FIELD, DATED MAY 2009

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Dear Mr. Freeman:

While reviewing the landscaping requirement in the Community Standards District (CSD) (L.8., Page 89), we see that the final version only required that the landscaping plan be consistent with a conceptual landscaping plan prepared by Mia Lehrer & Associates, dated October 2008. When inquiring about said plan we were referred to a website where there was a Mai Lehrer & Associate Plan dated November 4, 2008.

Throughout the review of the four versions of the CSD, Culver City repeatedly commented that specific measures needed to be taken to ensure that the landscaping meets the intent "to beautify and screen the operations from adjoining residential, recreational, institutional areas or adjacent public streets or highways." of Mitigation Measure V.1-1 of the CSD Environmental Impact Report (EIR). As the Mia Lehrer/PXP Plan only addresses three of the four sides of the oil field, we do not see how it meets the requirements of Mitigation Measures V.1-1 through V.1-3 especially as the plan relates to the views of the oil field operations from Culver City to the west.

Needless to say in reviewing the PXP Landscaping Plan, staff was shocked with the lack of landscaping proposed to be installed along the westerly side of the oil field. The PXP Plan does not properly analyze the viewshed from the west or provide for any landscaping or screening along the ridgeline overlooking Culver City. This ridgeline is visible for many miles and the oil field operations are seen by Culver City and City of Los Angeles residents and businesses. In PXP's proposed 2009 Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan, dated January 2009, Attachments Nos. 2 through 30 clearly illustrate the view impacts of oil field operations from the west.

The Landscaping Plan must address the required EIR mitigation measures and be consistent with the 2009 Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan. As such the proposed plan dated May 2009 is incomplete and insufficient in its attempt to beautify and provide screening of oil well operations for the oil field. The plan as proposed should be rejected and be required to be modified to address the viewsheds from all sides of the oil field.

Additional comments Include: (1) The use of mature landscaping should be required as it could be many years before visual impacts are abated if small immature landscaping is used, and (2) The County should be aware that in an executed agreement, PXP had promised to provide landscaping to shield pumping equipment in Culver City Park over four years ago. PXP has not honored that obligation by claiming that it was not feasible to do so. Thus, the County should have an effective enforcement mechanism to assure that PXP follows through with its landscaping obligations and advance assurance that landscaping is feasible in the Baldwin Hills.

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We look forward to working with the County to achieve the proper landscaping to beautify and screen the oil operations in Baldwin Hills. If you have any questions please contact Sherry Jordan, Senior Planner, at (310) 253-5746 or by email at [sherry.jordan@culvercity.org](mailto:sherry.jordan@culvercity.org).

Sincerely,



Sol Blumenfeld  
Community Development Director

SB:sj

Copy: Andy Weissman, Mayor  
Gary Silbiger, Councilmember  
Mark Scott, City Manager  
Carol Schwab, City Attorney  
Heather Baker, Assistant City Attorney  
Charles Herbertson, Public Works Director  
Thomas Gorham, Deputy Community Development Director/Planning Manager  
Sherry Jordan, Senior Planner



April 28, 2014

Richard Bruckner, Director  
Los Angeles County Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012

RE: Baldwin Hills Community Standards District Periodic Review Draft Report

Dear Mr. Bruckner,

Community Health Councils, Natural Resources Defense Council, The City Project, and Mujeres de la Tierra write to comment on the Baldwin Hills Community Standards District (CSD) Periodic Review Draft Report. We appreciate the Department of Regional Planning's (DRP) strategy to maintain protections but believe important opportunities to reduce the field's impact on the surrounding community were missed. Furthermore, this Periodic Review is the public's first opportunity to comprehensively comment on agencies' interpretation and implementation of the CSD's provisions. In many instances, agencies have met the letter of the law yet could use stronger rules that more effectively achieve the CSD's objectives of ensuring operations are harmonious with adjacent land uses and ensuring potential adverse impacts are minimized. We urge adopting the listed recommendations which aim to improve studies' accuracy and value, enhance transparency, foster a more robust Community Advisory Panel, and reduce the field's footprint.

#### Enable and Require Accurate Studies

##### 1. Prepare Accurate and Reliable Studies

Methodologically sound, fully-funded studies are necessary in order to detect harmful impacts, to discover changes in emissions, exposures, or cumulative health and environmental outcomes, and to establish a baseline against which future data can be analyzed. Studies deployed to date have been impeded by inadequate funds or flawed methodology. During the scoping process for the *Air Quality Study* for example, Sonoma Technology, Inc stated inadequate funds would preclude the agency from identifying where pollution detected originated from. The project's budget also prevented Sonoma Technology, Inc from measuring many important hazardous compounds and limited the monitoring

window to two weeks.<sup>1</sup> This means many hazardous emissions remain unmeasured and the public lacks an accurate picture of emissions over time.<sup>2</sup> Additionally, the *Inglewood Oil Field Communities Health Assessment* used flawed research methodology and an insufficient level of analysis that comprised the assessment's findings.<sup>3</sup> The *Ground Movement Study* has similar issues. The studies had reasonable, urgent research questions that remain unanswered due to avoidable missteps in design or project funding. Furthermore, this prevents the County and the public from establishing whether the CSD is achieving its goals.

**Recommendations:** The County should require the operator make available sufficient funds for agencies and subcontractors to conduct studies that could achieve outlined objectives if rigorous research methodology was applied. The County can use power granted in CSD Section G (1) to hold the operator responsible for all reasonable costs associated with monitoring and conducting studies. Future studies should also use research designs that could answer the study's questions, that account for key independent variables (such as socioeconomic status), measure cumulative exposure rates, impacts, and meaningfully involve the public and issue experts in the research design process as outlined in Appendix A, B, and C. Finally, we strongly urge supplemental assessments for any study that has not achieved primary research objectives. This includes immediate initiation of a supplemental air monitoring study and an *additional Health Assessment and Environmental Justice* study that clearly meets the settlement terms and uses revised assessment methodology.

## Transparency & Communication

### 1. Justify Recommendations

Throughout the CSD Draft Recommendation Report and in many Community Advisory Panel (CAP) meetings, the DRP will defend the status quo by claiming that better alternatives are infeasible. Often, these statements are counter to recent events and trends. For example, DRP has stated the field cannot power an electric rig. In nearby Hermosa Beach, however, E&B Natural Resources Management Corporation plans to use an electric rig at new proposed operations.<sup>4</sup> The DRP has not explained why electric rigs are practical in Hermosa Beach, but not in Baldwin Hills. The DRP also vaguely states insurance requirements and performance security holdings are adequate without an analysis of what the holdings are or why that level of coverage is appropriate. Such explanations not only undermines public confidence but also falls short of determining whether additional provisions should be added as described in section G.7 – "Periodic Review".

**Recommendation:** All determinations should be justified with quantitative explanations where appropriate. The DRP and the Draft Report should:

- Revisit and justify recommendations for sections G.4 and G.5; and
- Reassess the feasibility of using an electric rig.

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<sup>1</sup> Sonoma Technology, Inc. (2012). *Baldwin Hills Air Quality Monitoring Study: Business Proposal in Response to the RFP Released January 17, 2012*. Retrieved from [http://planning.lacounty.gov/assets/upl/project/bh\\_air-quality-sonoma.pdf](http://planning.lacounty.gov/assets/upl/project/bh_air-quality-sonoma.pdf). Page 2.

<sup>2</sup> Comment Letter on Air Study in Appendix A

<sup>3</sup> Comment Letter on Health Assessment in Appendix B. Independent assessment of the Health Assessment in Appendix C.

<sup>4</sup> Hermosa Beach Oil Development Proposal Environmental Impact Report.  
<http://www.hermosabch.org/modules/showdocument.aspx?documentid=3750>

## 2. Improve Data Access

As stated in Community Health Councils, Natural Resources Defense Council, Mujeres de la Tierra, and City Project's letter on the Periodic Review, dated September 25<sup>th</sup>, Freeport McMoran (FCX) and the County should enhance data access. This includes making collected data and reports available to the public to support further research and analysis.<sup>5</sup> This also includes clarifying the connection between the County's CSD website and FCX's CSD website. The sites use different titles for the oil field<sup>6</sup> and users may land on one page without knowing important reports are on another page.

**Recommendations:** We first recommend all oil field-related data and FCX reports transmitted to SCAQMD, the DRP, the fire chief, DOGGR, and other similar agencies be posted and made available online quickly and in a manner the public can readily understand. We secondly recommend FCX and the County improve information access by merging online resources and/or cross-linking their respective web sites. Each site should provide a section explaining the relationship between with the County's and FCX's sites. Although this is not required by the CSD, such a move enables users to better understand the relationship between the sites and utilize information.

## 3. Broaden Public Outreach

The County and FCX have an obligation to notify the public of important information such as field operations, the Periodic Review timeline, and events. Sharing such information is necessary to meaningfully involve the public in decisions regarding the field's operations. The DRP has demonstrated their willingness to meet public input needs by extending the public comment period to 60 days. This is commendable. Yet, the DRP has also stated their belief that the CAP should share the public notice responsibility. While CAP members are committed to providing input, they do not have the capacity nor is the CAP charged with the responsibility to do widespread information dissemination.

**Recommendation:** The County and FCX should utilize their websites to develop an early notification system. In addition, the county and FCX should distribute notices to neighboring homeowner associations, neighborhoods councils, faith-based organizations, schools and post notices of important information at numerous public facilities (i.e. libraries, grocery stores, and schools). The County should also consider attending and presenting at community meetings.

### Enhanced Support for the CAP

#### 1. Adequate Notification

The CAP is the primary conduit for the public to voice their concerns and to learn about oil field developments. Previously, the CAP was not provided sufficient notice or time to review and comment on key reports and plans. While the CAP may not have final decision making authority, it should serve a strong advisory role to the Director. We appreciate the DRP's effort to provide adequate public comment period with the Draft CSD Periodic Review report and want assurances this practice will continue.

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<sup>5</sup> For example, FCX currently collects hydrogen sulfide and total hydrocarbon vapor data and issues reports every quarter to the fire chief. This information could also be listed on either the County or Freeport's website.

<sup>6</sup> County: Baldwin Hills Community Standards District versus Freeport: Inglewood Oil Field

**Recommendation:** We urge the DRP to revise the agency's report and plan sharing policy to provide the following:

- At least 10 business days to review information-only plans and reports (i.e. quarterly complaint logs) to allow adequate time for documents to be presented at a CAP meeting and reviewed by the public;
- At least 60 days to comment on key plans and reports requiring CAP and public input (i.e. Periodic Review Documents);
- Inclusion of all CAP's findings and written explanation from the Director explaining why recommendations were or were not incorporated in the Director's final decision.

## 2. Foster an Engaged and Informed CAP

The CAP was designed to enable communication between stakeholders and the field operator so the parties could better understand one another. This requires expedient information sharing and a robust CAP with active, informed members. Currently, the CAP meetings typically fail to provide important information. Residents and CAP members raise questions but the operator ombudsperson largely fails to answer during the meeting citing the need to ask other staff. While the ombudsperson often addresses unanswered questions in subsequent meetings, the conversation flow is lost or the inquirer is absent from the meeting. Additionally, the CAP's attendance and communication with the Multiple Agency Coordination Committee (MACC) could be bolstered. Some organizations and stakeholders representatives have consistently missed meetings and the MACC and CAP have little communication with one another. The DRP made a positive first step by committing to reviewing CAP membership in the Draft Periodic Review Report, yet further action by DRP is needed to revamp the CAP membership's engagement.

**Recommendation:** We recommend measures to improve meeting attendance and member knowledge. Suggested measures include:

- a. *Require Operator Send Additional Knowledgeable Employees:* To allow more real-time conversation about attendees' questions and concerns, the operator should send additional knowledgeable staff who can answer many of the questions posed at CAP meetings.
- b. *Meeting Attendance:* The DRP could increase meeting attendance by contacting groups missing numerous meetings (i.e. more than five consecutive meetings) and requesting the group designate another person to attend the CAP meetings.
- c. *Enhanced Inter-Committee Communication:* We finally recommend improving collaboration and communication between the CAP and MACC. CAP and MACC are largely uninformed of each other's interests, concerns, and activities and this impedes informed decision-making. We recommend MACC submit reports to the CAP and send a representative to regularly attend CAP meeting.

## Minimize Oil Field's Impacts

### 1. Evaluate Fire Safety Precautions

As discussed in numerous CAP meetings, the Baldwin Hills Oil Field has experienced a spike in fires in the last year. Southern California Edison (Edison) and FCX have not always been able to identify the impetus

for the fires or state whether all necessary precautions have been taken to prevent future fires.<sup>7</sup> Edison has only stated the infrastructure is up to code. The uptick in fires suggests current electrical infrastructure fire prevention measures are insufficient. The historic drought conditions means FCX and other relevant bodies should take necessary measures to ward off future fires. It also means unannounced fire drills are crucial to identify issues in fire response procedures.

**Recommendation:** DRP, Southern California Edison, the Culver City Fire Department, and Los Angeles County Fire Department should conduct an independent study that determines what additional measures could be taken to prevent ignition of future fires. We support DRP's plan to coordinate execution of unannounced drills with the Fire Department and urge conducting these drills as soon as is practicable.

## 2. Update Air Monitoring Rules

The Air Monitoring Plan should include methane monitoring and review the appropriateness of the air monitoring equipment. Since the CSD's passage, Colorado updated petroleum production regulations to require companies to monitor and control methane and volatile organic compound emissions.<sup>8</sup> As is well documented, methane is a powerful greenhouse gas and the operator should take reasonable measures to prevent unnecessary releases. We secondly request a determination of whether air monitoring equipment is able to accurately capture spikes in emissions. A study recently published in *Reviews on Environmental Health* determined the air quality average typically used by equipment can severely underestimate the public's actual exposure.<sup>9</sup> These are just two tools that may reduce the field's impact on the surrounding communities.

**Recommendation:** The Air Quality Management District and DRP should evaluate the appropriateness of requiring methane and volatile organic compound monitoring equipment as done in Colorado. Any determination should quantify the benefits of using the new technology and should require adoption if the monitoring could reduce the field's impact on the surrounding area. In light of emerging research published in the *Reviews on Environmental Health* journal, we request the Air Quality Management District and DRP review whether current equipment and measurement methods are appropriate.<sup>10</sup>

## 3. Measuring and Limiting Noise Spikes

As the Draft Periodic Review Report states, the public has filed 47 complaints on noise over the last few years. The primary sources identified by the DRP were from maintenance and work-over rigs as well as the banging of pipes. Yet, any incidents where the noise monitoring equipment recorded sound above the permissible decibel level came from activity outside of the oil field's operations. This suggests the current noise requirements are insufficient. The public is bothered by noise from the oil field's operations, yet that activity does not register as above the permissible level.

**Recommendation:** The DRP and the Department of Public Health should reevaluate the noise monitoring plan and rules. The issue may lie in the location of monitoring equipment, in the reliance

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<sup>7</sup> January 23<sup>rd</sup> CAP Meeting.

<sup>8</sup> Regulations are available at <http://www.colorado.gov/cs/Satellite/CDPHE-AQCC/CBON/1251647985820>

<sup>9</sup> Brown, D., Weinberger, B., Lewis, C., & Bonaparte, H. (2014). Understanding exposure from natural gas drilling puts current air standards to the test. *Reviews on Environmental Health*, 0(0). doi:10.1515/reveh-2014-0002

<sup>10</sup> Brown, D., Weinberger, B., Lewis, C., & Bonaparte, H. (2014). Understanding exposure from natural gas drilling puts current air standards to the test. *Reviews on Environmental Health*, 0(0). doi:10.1515/reveh-2014-0002

on an hourly, A-weighted measurement, or other factors. Detection and a remedy to the underlying issue(s) are needed to prevent operations from continuing to disrupt the surrounding area.

#### 4. Enhance Landscaping

Landscaping is “to beautify and screen the operations from adjoining residential, recreational, institutional areas or adjacent public streets or highways”<sup>11</sup> yet the visual blight related to the oil field continues to be a concern for area residents. The view shed from surrounding homes has seen little if any improvement. The City of Culver City and the public have raised concerns over the field’s aesthetics and screening during CAP meetings and in the DRP’s electronic survey on the CSD Periodic review. Additionally, vegetation along the perimeter does not appear to be maintained or irrigated causing potential fire hazards as well as further blight. Planting additional trees, ground plants, and shrubs are a relatively low-cost investment that may have the added benefit of filtering emissions.

**Recommendation:** DRP and the CAP should jointly review the effectiveness of previous landscaping plantings and enhance screening where needed. Future landscaping plans should be revamped to provide greater screening of the field both along the perimeter and interior where feasible.

#### 5. Address Unconventional Oil Production

The CSD and CSD Periodic Review fail to directly address risks presented by unconventional oil extraction, stimulation, and production activities. When the CSD was created, hydraulic fracturing and acidizing technologies were largely unknown to the public. As a result, the CSD was not structured to protect against the unique harms unconventional oil extraction activities can bring. Acidizing requires operators transport, store, and use harmful substances and can result in the creation of secondary pollutants with health implications like silica sand and chlorinated solvents.<sup>12</sup> Acidizing can also result in further contamination by corroding casing.<sup>13</sup> Hydraulic fracturing has been identified as the likely source of earthquakes in Ohio<sup>14</sup> and has been linked to water contamination.<sup>15</sup> This omission is disconcerting because now DOGGR describes fracturing as a regular practice and at least 40 wells in the Baldwin Hills Oil Field underwent an unconventional oil production treatment like acidizing over the last year.<sup>16</sup> Although Senate Bill 4, passed in 2013, aims to regulate this activity statewide, the legislation’s regulations will likely exempt some acidizing activities from the proposed requirements. With some acid

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<sup>11</sup> Los Angeles County Department of Regional Planning. *Final Environmental Impact Report: Baldwin Hills Community Standards District*. Marine Research Specialists. 2008. Print.

<sup>12</sup> Florida American Industrial Hygiene Association 2012 Conference: <http://flaiha.wildapricot.org/Resources/Documents/Conferences/2012%20Spring%20Conference/Presentations/Risk%20Assesment.pdf>.

<sup>13</sup> Rajeev, P., Surendranathan, A. O., & Murthy, C. S. N. (2012). Corrosion Mitigation of the Oil Well Steels Using Organic Inhibitors – A review. *Journal of Materials and Environmental Science*, 3(5), 856–869.

<sup>14</sup> L.A. Times Editorial Board. (2014, April 20). Does fracking cause quakes? California needs to know. *Los Angeles Times*. Retrieved from <http://www.latimes.com/opinion/editorials/la-ed-fracking-20140420,0,4013877.story>

<sup>15</sup> Jackson, R. B., Vengosh, A., Darrah, T. H., Warner, N. R., Down, A., Poreda, R. J., ... Karr, J. D. (2013). Increased stray gas abundance in a subset of drinking water wells near Marcellus shale gas extraction. *Proceedings of the National Academy of Sciences*. doi:10.1073/pnas.1221635110

<sup>16</sup> The South Coast Air Quality Management District’s “Oil and Gas Activity Notification” site (at <http://xappprod.aqmd.gov/r1148pubaccessportal/>) reported at least 40 acidizing treatments in the last 10 months.

treatments unaddressed in SB 4 and ignored in the CSD and CSD Periodic Review, this leaves the activity's unique hazards overlooked and unaddressed.

**Recommendation:** The County should review what risks unconventional oil production activities, like acidization, can present and determine what additional protections the CSD needs to protect against those hazards in consultation with the AQMD, Regional Water Quality Board, EPA, and Community Advisory Panel. The DRP response to this comment in the Draft Periodic Review Report was that this is unnecessary since hydraulic fracturing is not occurring in the field. Although FCX is not currently fracturing, the company is using acidizing. Furthermore, no fracturing-specific protections are in place should FCX initiate the practice in the future. Only by thoroughly reviewing and outlining the risks the activities present can the DRP guarantee it is adequately protecting the public's health, safety, and welfare. We additionally recommend the County prohibit well stimulation treatments until completion of the Senate Bill 4 mandated study of well stimulation risks, and it is proven the activity can occur without endangering the public's health and safety.

## 6. Expanding Baldwin Hills State Park

Neighboring communities have limited access to parks with only one regional park in South Los Angeles.<sup>17</sup> Through strategic land management, the Operator and the County could expand acreage and access to the Kenneth Hahn State Park and expand park space in other neighboring places. To demonstrate the operator's commitment to improving the community, FCX could grant Los Angeles County Department of Parks and Recreation access to underutilized field sections.

**Recommendation:** We urge the DRP request FCX grant access to unused portions of the field on the perimeter to the Parks system. One example of interest to the undersigned stakeholders is mapped below. FCX could provide an easement adjacent to the north-western section of La Cienega Boulevard for a trail that would allow surrounding neighborhoods to more easily access park spaces.



## 7. Shrinking the Field

<sup>17</sup> Parkland Summary Sheet by Community Plan Area. (2012) City of Los Angeles Department of Recreation and Parks.

While we appreciate protections and aesthetic improvements the CSD has ushered in, this site remains an undesirable neighbor. The mere presence of the field causes stress to many residents and oil production prevents more harmonious uses, such as open space, from locating in the area. The closer wells are to homes and schools, the greater the risk is to public.

**Recommendation:** We recommend the DRP create a timeline and plan for shrinking the field's physical size. This could include using the bonus well program to encourage the operator to centralize well location. We encourage the DRP to lower the basic annual cap (i.e. reduce the guaranteed 35 wells) and allow the operator to maintain production levels only by earning bonus wells with a reduction in the field's physical size.

Thank you for your consideration of our concerns and recommendations. Should you have any questions or need further clarification – please feel free to contact us directly.

Sincerely,



Lark Galloway-Gilliam  
Executive Director  
Community Health Councils  
lark@chc-inc.org  
(323) 295-9372



Damon K. Nagami  
Senior Staff Attorney  
Natural Resources Defense Council  
dnagami@nrdc.org  
(310) 434-2300



Robert Garcia  
Founding Director and Counsel  
City Project  
rgarcia@cityprojectca.org  
(213) 977-1035



Irma R. Munoz  
President/CEO  
Mujeres de la Tierra  
Irma.munoz@mujeresdelatierra.org  
(323) 350-3306

CC: Supervisor Mark Ridley-Thomas  
Senator Holly Mitchell  
Assemblymember Sebastian Ridley-Thomas

## APPENDIX A

August 31, 2012

Richard Bruckner, Director  
Los Angeles County Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012

Attention: Rena Kambara via [rkambara@planning.lacounty.gov](mailto:rkambara@planning.lacounty.gov)

Subject: Baldwin Hills Air Quality Monitoring Study Comments

Dear Mr. Bruckner;

We take this opportunity to comment on the draft Baldwin Hills Air Quality Monitoring Study commissioned by the department pursuant to the terms of the July 2011 settlement agreement. We have reviewed the draft with the assistance of a qualified consultant who has prepared and conducted numerous air quality assessments. We question (1) the reliance upon the emission data presented in the 2008 Environmental Impact Review, (2) compromises made on the scope of the study as a result insufficient funding for the project, (3) the absence of a toxicological examination of the cumulative effects of the individually identified toxins and (4) the lack of a written agreement with PXP to assure that they will provide their operations data to (and share their annual workplan scheduling cooperatively with) the consultant. We strongly urge the County to re-visit the workplan based on the following comments and recommendations:

**Lack of Independent Verification of Emission Data:** STI indicates it “used the reported emissions from 2005 and 2006 used in the Baldwin Hills Community Standards District EIR”. The EIR air quality data relied on the AQMD’s West LA monitoring station located at least 2.54 miles north and the Lennox Station located about 4.2 miles south of the oil field. (FEIR at p. 4.2-3.) In addition to its reliance on those non-adjacent stations, the EIR air quality analysis also relied on PXP’s annual emissions reports for fiscal years July 2005 and June 2006 (FEIR at p. 4.2-9), which are already more than five years old and are not independently verifiable.

This data used in the EIR has now informed the fundamental design and scope of the proposed study. The sampling and reliance on secondary data sources was questioned during the CEQA public review process and again in the August 15, 2012 letter from the South Coast Air Quality Management District (AQMD) in its comments on the study design. For example, AQMD notes that “ultrafine particles (UFPs) emissions were not accounted for in the Baldwin hills Community Standards District EIR...but are likely to be elevated within and around the study area.” This is of particular concern given the assertion that exposure to UFPs has been linked to respiratory and cardiovascular diseases as indicated by Dr. Cyrus Rangan author of the County Health Assessment in a July 2012 CAP meeting. The February 2011, LA County Department of Public Health Inglewood Oil Field Communities Health Assessment found, higher age-adjusted mortality rates in the Inglewood Oil Field communities compared to Los Angeles County for asthma (2.5 in Inglewood Oil Field Communities vs 1.4 LA County) and coronary heart disease (196.2 vs 187.6 in LA County).

Furthermore, operations since the release of EIR have significantly been changed due to increased oil field activity and presence of new technologies, including hydraulic fracturing, that are now known to be taking place throughout the field. STI nonetheless relies upon this data to rank and prioritize the pollutants to be studied and therefore the methodology. The reliance on this data undermines the fundamental credibility and integrity of the study.

**Compromises Made in Scope of Study:** As noted in the draft, “Due to budgetary constraints, STI was forced to prioritize the pollutants for which monitoring could take place at high temporal resolution and to propose less than a full year of monitoring for some toxics.” This approach does not provide the public with the assurance or scientific certainty of the pollutants and toxins in the field. The lack of funding compromises the integrity of the study by forcing constraints on:

- a. Capacity and pollutants to be captured and measured
- b. Length of time and seasonal variations for which critical toxins are captured and studied as noted in the AQMD comment letter
- c. Identification and measurement of fugitive gases and soil vapors independent of current drilling operation resulting from spillage and leaks in abandoned wells

We question if the proposed two week period for monitoring VOCs will provide sufficient data on what is occurring in the field over time. The study does not demonstrate the time period proposed is based on any particular conditions. Furthermore -while the scientific evidence regarding the health impact of various toxins may be inconclusive at this time – gathering this data at this point can be beneficial as the science catches up with the new technology used for drilling and oil extraction. It seems short-sighted to simply omit these compounds from the study.

**Lack of Toxicological Examination:** The study examines the presence of the individual pollutants but fails to examine the potential chemical reaction and health risk when two or more of the pollutants are combined. The presence of any of the individual compounds in the quantities identified in the EIR may or may not present a health risk. However, the EIR failed to and now the proposed study does not appear to examine the cumulative effects of how a combination of chemicals at various concentration levels may attach to particulates and pose a health risk. It is not clear if any member of the study’s team is qualified to conduct this aspect of the study and address this unanswered question.

**No Written Agreement to Give Air Quality Consultant Access to PXP Operation’s Data:** According to STI, “Of critical importance to fully addressing the study objectives is the documentation of time/location activity information for major Oil Field operations. Topping this list of activities are well drilling and well work-overs.” Yet, to date STI has received only inadequate verbal commitments from PXP to set up a mechanism for sharing operation schedules and data. Without this information, STI will be unable to meet the primary and secondary objectives of the study.

**Recommendations - we offer the following recommendations to strengthen the utility of the study:**

1. Divide the study into two phases and **revise the current workplan to establish an independent, comprehensive and scientifically based baseline.** The baseline study should not assume the absence of any toxins or levels of concentration, but rather be designed to identify as many of the pollutants and toxins present in the field as scientifically feasible.
2. **The study should also include a toxicological analysis of the data.**
3. Design the second phase of the study to **examine the correlation between emissions and the various activities in the field.** Require PXP to agree to provide data on their schedule of activities in

the oil field in writing and design the collection of data to correspond with the various aspects and levels of each operation. The information-sharing from PXP should include but not be limited to the nature of the operation, duration, output, quantity of material injected into the well, readings from the monitoring devices at the well head, etc.

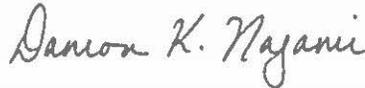
4. **Perform the supplemental recommendations outlined in the AQMD comment letter.**
5. **Seek funding from PXP to complete the second phase of the study as described above, including monitoring for PM .1. PXP has continued to assert their activities and the oil drilling operation are safe. Underwriting an independent empirical study would assess the accuracy of that assertion and they should therefore be asked to provide the needed additional funding.**
6. **Black Carbon monitoring should specify monitoring for both PM 1.0 and PM 2.5 using the same methods used to measure the background levels for BC.**
7. **Make public all written comments submitted to the County, and include CAP in all consolidation and prioritization of public comments.**
8. **Make public all data collected to support additional research and analysis.**

Thank you in advance for your response to the questions raised and your consideration of these recommendations. The goal is to provide the public with the highest level of confidence that the County is effectively monitoring and protecting the public's health and safety. We believe these recommendations for revising the workplan are a step in that direction.

Sincerely,



Lark Galloway-Gilliam, MPA  
Executive Director  
Community Health Councils



Damon K. Nagami  
Staff Attorney  
Natural Resources Defense Council

CC: Supervisor Mark Ridley-Thomas  
Senator Curren Price  
Assemblymember Holly Mitchell



Community Health Councils, Inc.



3731 Stocker Street  
Suite 201  
Los Angeles, CA 90008

Tel: 323.295.9372  
Fax: 323.295.9467  
www.chc-inc.org

## APPENDIX B

September 26, 2013

Jonathan E. Fielding, M.D., M.P.H.  
Director of Public Health and Health Officer  
313 North Figueroa Street Rm. 806  
Los Angeles, CA 90012

RE: Inglewood Oil Field Communities Health Assessment and Inglewood Oil Field Communities' Survey

Dear Dr. Fielding,

Community Health Councils (CHC) has reviewed the February 2011 Inglewood Oil Field Communities Health Assessment as conducted by the Los Angeles Department of Public Health (DPH) and the subsequent Baldwin Hills Community Standards District Periodic Review letter dated May 29, 2013 recommending no further study for the periodic review. We are deeply concerned with the quality of the initial study and conclusion on the part of the department as to the utility of future surveys. We therefore call upon the LADPH to complete a supplemental community health assessment that clearly meets the Settlement Agreement and uses better methodology.

Upon review of the initial study, it is clear that the County has not adhered to Health Assessment obligations, such as the Environmental Justice Study provision, outlined in the Inglewood Oil Field Settlement Agreement. We also have strong reservations that the study's methodology compromises its validity. Although the study cannot determine causal relationships between the Inglewood Oil Field and reported illness, rigorous methodology could identify unusual patterns of disease. The Community Health Assessment's inappropriate research methodology, insufficient level of analysis, and exclusion of the Health Working Group may have resulted in DPH missing noteworthy patterns of disease or environmental injustices in the oil field communities. Furthermore, this initial study was expected to provide a baseline against which future data would be analyzed, and not a final report on the health impacts of the oil field on the health of the surrounding population. In order for the Baldwin Hills Community Standards District (CSD) to achieve its goal of protecting the public's health and welfare, the County must understand the health risk associated with the oil fields and examine any potential patterns of illness and disease by addressing the following:

## Failure to Satisfy Settlement Terms

### **The Study Does Not Adhere to Section Five of the Baldwin Hills Community Standards District Settlement Agreement.**

One of the stated goals of the Baldwin Hills CSD is “protecting the comfort, health, safety, and general welfare of the people living, working, and recreating in the surrounding areas”.<sup>18</sup> CSD and CSD settlement-related provisions *can* help achieve this aim but only with proper implementation. One such tool, the Community Health Assessment, is described in Section 5 of the settlement:

*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... Public Health will analyze the information by socio-economic and demographic data to accommodate and reflect an Environmental Justice component.<sup>19</sup>

The Community Health Assessment does not include an environmental justice component as the settlement requires. Additionally, the study considered socio-economic data on a very limited basis and in a manner that inhibits detection of environmental injustices. This methodology not only disregards the settlement terms but also likely biases the results and may mean problematic health patterns were missed.

#### **1. The Study Does Not Satisfy the Socio-Economic Status Analysis Requirement**

Organizations like the American Psychological Association define socio-economic status “as the social standing or class of an individual or group. It is often measured as a combination of education, income and occupation.”<sup>20</sup> A socio-economic analysis should include adjustments for demographics like race, income, *and* education because a combined measure of such dimensions better predict individual’s social standing than a one-dimensional predictor. Consideration of socio-economic data was not only required by the Settlement, but is also sound methodology because socio-economic status, representative of social standing, is predictive of general population’s pollution exposure and health outcomes.<sup>21</sup>

The survey did not adjust for race, income, and education on most data points. On key health outcome variables, including mortality, low-birth weight births, birth defects, cancer rates, perception of health status, and average number of poor physical health days, the study only adjusted for race and ethnicity. As more thoroughly discussed in the “Inappropriate Methodology Section”, race is an inaccurate proxy for socio-economic status for Baldwin Hills Oil Fields neighborhoods because those communities’ median income is higher than Los Angeles County levels.

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<sup>18</sup> Baldwin Hills Community Standards District Code: 22.44.142(A).

<sup>19</sup> Baldwin Hills Community Standards District Settlement Agreement: Community Health Councils, Inc, Et Al. v. County of Los Angeles. Superior Court of the State of California. 15 July 2011.

<sup>20</sup> "Socioeconomic Status." *Socioeconomic Status*. American Psychological Association, n.d. Web. 21 Aug. 2013. <<http://www.apa.org/topics/socioeconomic-status/>>.

<sup>21</sup> Pastor, Manuel. "Racial/Ethnic Inequality in Environmental-Hazard Exposure in Metropolitan Los Angeles." Center for Justice, Equality, & Tolerance, 2001. Web. <[http://cjtc.ucsc.edu/docs/r\\_racialhazardexp.pdf](http://cjtc.ucsc.edu/docs/r_racialhazardexp.pdf)>.

## 2. The Study Does Not Satisfy the Environmental Justice Requirement

The Community Health Assessment also neglected discussing environmental justice. The U.S. Environmental Protection Agency defines environmental justice as:

The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental and commercial operations or policies.<sup>22</sup>

A discussion of environmental justice could inform decision-making and CSD policy development by identifying whether residents were included in the policy-making process or whether particular groups disproportionately experience harms from the oil fields.<sup>23</sup> The environmental justice discussion was not only required, but is also necessary to uphold the CSD's goal of protecting the general welfare of the people in the surrounding areas.

**Recommendation:** Conduct a supplemental Community Health Assessment which adjusts for socio-economic status and discusses environmental justice with an analysis of community engagement, considerations made during the oil field policy decision-making process, and whether some groups are disproportionately impacted by oil field operations.

### Methodology Shortfalls

#### 1. Failure to Adjust for Health Outcomes by Socio-Economic Status

An interconnected issue is that the Community Health Assessment's adjustment for race rather than socio-economic status may mean DPH missed important health outcome patterns. Race alone is an inappropriate measure of social standing for a community, especially for the Baldwin Hills Oil Field Communities who are uniquely wealthier than most Los Angeles County minority communities. Adjusting for race is appropriate if there is a genetic link between race and disparity of health outcomes, yet public health literature suggests otherwise. According to the American Journal of Epidemiology, "Race is a social construct and not a biologic reality..." and "The variable race is generally thought to measure some combination of social class, culture, and genes. Yet race is only a rough proxy for each of these."<sup>24</sup> As shown in the table below, the median household income of the "Inglewood Oil Field Communities"<sup>25</sup> of color is up to \$14,500 more than their Los Angeles County counterparts.

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<sup>22</sup> "Environmental Justice: Basic Information." EPA. Environmental Protection Agency, n.d. Web. 29 July 2013. <<http://www.epa.gov/environmentaljustice/basics/index.html>>.

<sup>23</sup> Environmental Justice. California Energy Commission, n.d. Web. 21 Aug. 2013. <[http://www.energy.ca.gov/public\\_adviser/environmental\\_justice\\_faq.html](http://www.energy.ca.gov/public_adviser/environmental_justice_faq.html)>.

<sup>24</sup> Jones, CP. Invited Commentary: "Race," Racism, and the Practice of Epidemiology. American Journal of Epidemiology. (2001) 154 (4): 299-304.

<sup>25</sup> As defined by the Community Health Assessment cancer estimations.

	Per Household Median Income <sup>26</sup>		
	"Inglewood Oil Fields Communities"	L.A. County	Difference
White Alone	\$66,156	\$61,249	\$4,907
African-American	\$55,095	\$40,581	\$14,514
Asian	\$75,324	\$63,801	\$11,523
Other	\$42,955	\$42,816	\$139
Hispanic	\$45,731	\$44,076	\$1,655

If one examines only the census tracts adjacent to oil field, the income disparities are even greater (\$23,000 to \$33,800).

	Per Household Median Income <sup>27</sup>		
	Census Tracts "Adjacent to the Inglewood Oil Fields Communities" <sup>28</sup>	L.A. County	Difference
White Alone	\$84,135	\$61,249	\$22,886
African-American	\$74,382	\$40,581	\$33,801
Asian	\$86,852	\$63,801	\$23,051
Other	\$66,572	\$42,816	\$23,756
Hispanic	\$71,151	\$44,076	\$27,075

With higher income, we should expect better health outcomes for Inglewood Oil Field Communities relative to other Los Angeles County African Americans, Latinos, and Asians. DPH should have controlled for income in order to compare health patterns in communities of similar socio-economic status, which is a more accurate and direct predictor of communities' health.<sup>29</sup>

**Recommendation:** With minority communities disproportionately living in more toxic and polluted neighborhoods than the general public,<sup>30</sup> we strongly urge completion of a supplemental Community Health Assessment that minimally adjusts for race *and* income on all key health outcome measures.

<sup>26</sup> U.S. Census Bureau; American Community Survey, 2009 American Community Survey 5-Year Estimates, Variable S1903; generated using American FactFinder; <<http://factfinder2.census.gov>>; (10 August 2013).

<sup>27</sup> U.S. Census Bureau; American Community Survey, 2009 American Community Survey 5-Year Estimates, Variable S1903; generated using American FactFinder; <<http://factfinder2.census.gov>>; (10 August 2013).

<sup>28</sup> Used DPH's Health Assessment Survey definition of "adjacent" or the census tracts: 2364.00, 2360.00, 7025.02, 7026.00, 7030.01, 7030.02, and 7031.00.

<sup>29</sup> National Research Council (US) Panel on Race, Ethnicity, and Health in Later Life; Anderson NB, Bulatao RA, Cohen B, editors. Critical Perspectives on Racial and Ethnic Differences in Health in Late Life. Washington (DC): National Academies Press (US); 2004. 9, Race/Ethnicity, Socioeconomic Status, and Health. Available from: <http://www.ncbi.nlm.nih.gov/books/NBK25526/>

<sup>30</sup> Health Equity Scorecard. Community Health Councils. 2008.

## **2. Failure to Report and Adjust for Length of Residency in Area**

The study fails to provide data on the length of residency of the survey respondents. Understanding long-time residents' patterns of illness and disease is more useful than cross-section reporting of people who currently reside in the area. For example, the study sample may consist primarily of residents who have lived in the area for three years or less and have a low chance of exhibiting oil field-related unusual patterns of disease. In the absence of adjusting for this data, it is hard to determine the validity of the study sample. Further, longtime residents could have been exposed earlier in life but have since moved. Therefore their rates of morbidity and mortality would be accounted for in the LA County rates rather than the "Oil Field Community."

**Recommendation:** Stratify results by length of residency and create a sample mostly comprised of long-term residents (10 years or more) in order to account for exposure time.

## **3. Failure to Address Study Limitations and Explain the Study's Research Design**

While the authors outline the study's limitations, they do not provide justifications for how limitations were either accounted for or addressed by the study's design and analysis. The study should articulate foreseen limitations and the study's design or analysis strategy for overcoming likely limitations. Some noteworthy limitations the study could have addressed include the following:

- The study's small sample limits its ability to detect statistically significant differences between the LA County and the Oil Field Communities. For this reason, the vague description of the analysis plan is concerning. It's unclear whether the study accounted for multiple testing issues and small cell sizes.
- Phone interviews likely contributed to the study's low response rate. The researchers could have over-sample or used alternative data collection methods to compensate for a low phone response rate.
- The study does not comment on the hypotheses tested or why questions were chosen-beyond comparability to the earlier survey. As requested by the community advisory group, questions about self-reported symptoms (like coughing, runny noses and others) related to pulmonary infections should have also been included rather than focusing on health behaviors that are unrelated to oil field toxic exposures.

**Recommendation:** All future studies should include a section that articulates the way the study limitations were addressed either by study design or analysis strategies.

## **4. The 1.5 Mile Sample Buffer Was Not Connected to the Likely Travel and Contamination Patterns of Oil Extraction Pollution.**

The Community Health Assessment will better detect unusual disease patterns if the assessment only surveys residents with the potential to be exposed to oil field pollutants. The survey simultaneously should avoid oversampling unexposed people based on where oil field contaminants could, with reasonable certainty, migrate to. The danger each pollutant poses varies based on

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Pastor, Manuel, Jr. *California Policy Research Center: University of California*. Rep. Center for Justice, Equality, & Tolerance, 2001. Web. 18 Aug. 2013. <[http://cjtc.ucsc.edu/docs/r\\_racialhazardexp.pdf](http://cjtc.ucsc.edu/docs/r_racialhazardexp.pdf)>.

expected spatial travel patterns. For example, diesel exhaust from drill rigs, work-overs, and oil field vehicles may acutely endanger persons within a half-kilometer of the field while more centralized operations would follow Gaussian shapes that impact persons at greater distances. Furthermore, exposure to water contamination is shaped by drainage patterns, rock morphology, and groundwater flow. Without an evidence-based explanation of the communities assessed, we are concerned the assessment under-sampled neighborhoods most likely to face pollution exposure. This would limit DPH's ability to detect disease patterns occurring in communities hypothetically impacted by the oil fields' activities.

**Recommendation:** Through a literature review, identify which neighborhoods are reasonably likely to face oil field air, soil, and water runoff pollution exposure. Furthermore, stratify the sample and analyze results in quarter-mile increments. We recognize there is inconclusive data on oil field emissions travel patterns,<sup>31</sup> yet evidence and logic indicates that exposure decreases as distance from pollution sources increases.<sup>32</sup> Since disparate pollutants will have varying health impacts at different distances, only by stratifying the sample, for example into quarter-mile increments, can researchers have a chance at detecting disease patterns. Furthermore, a more fine-tuned examination allows detection of more acute issues like odor, noise, and vibration problems.

#### 5. Census Tract too Imprecise.

Oil field-adjacent Census tracts are an insufficient measure of an individual's potential oil field pollution exposure as census tracts' distance from the field is highly variable. Only 5 of the 29 "Inglewood Oil Field Communities" census tracts actually border the oil field. The remaining 24 oil field adjacent tracts fall varying distances from the field. Furthermore, some census tracts extend from the field to the 1.5 mile buffer zone (i.e. census tracts 7030.01, 2360.00, 7030.02, and 7026.00). Potential exposure levels within a tract will vary considerably based on a respondents distance from the Inglewood Oil Fields and aggregating information from all oil field adjacent tracts may obscure location-based health trends.

**Recommendation:** In line with the prior recommendation regarding buffers, stratify data results into distinct buffers in quarter to half-mile increments.

#### 6. Inconsistent definition of "Inglewood Oil Field Communities" between the Inglewood Oil Field Communities Health Assessment (2/2011) and Results of the 2011 Inglewood Oil Field Communities' Survey (4/2012).

In DPH's study, "Inglewood Oil Field Communities" are first identified as 29 Census tracts in the mortality assessment, while 19 Census tracts are used for the cancer assessment. Furthermore, birth defect data draws on ZIP Code Data which is composed of incompatible census tracts. The unstandardized definition of "Inglewood Oil Field Communities" across studies creates additional concern about the study's ability to spot disease patterns.

**Recommendation:** Standardize the definition of "Inglewood Oil Field Communities" alongside the recommendations of stratifying sample reporting in future health assessments.

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<sup>31</sup> Witter, et al. "Potential Exposure-Related Human Health Effects of Oil and Gas Development: A White Paper. Colorado School of Public Health, University of Colorado Denver. 2008. Accessible via: [http://docs.nrdc.org/health/files/hea\\_08091702a.pdf](http://docs.nrdc.org/health/files/hea_08091702a.pdf)

<sup>32</sup> Saadat, et al. "Hematological changes due to chronic exposure to natural gas leakage in polluted areas of Masjid-i-Sulaiman (Khozestan Province, Iran). *Ecotoxicology & Environmental Safety* 58(2): 273-6. 2004.

## Insufficient Level of Reporting

### 1. Insufficient Information to Determine if the Sample Size Allows Detection of Statistically Significant Results

The report failed to provide information on how DPH and Field Research Corporation arrived at a sample size of 1,020 people and whether or not this sample size was enough power to detect significant differences in patterns of disease. If the study's sample size is too small, even large health outcome differences between the "Inglewood Oil Field Communities" sample and larger LA County sample will likely remain unobservable.<sup>33</sup>

**Recommendation:** Clearly articulate how the sample size of 1,020 was identified and indicate the techniques used to detect statistically significant differences in morbidity and mortality.

### 2. Inadequate Timeframe for Trend Data

One of the health assessment's strengths is the use of trend data; however, it is unclear why the seven-year period was chosen beyond it being the most recent data. The analysis should have included trends that correspond to the before, during and after periods of the oil field production. The examination of mortality is a long range outcome and reporting morbidity (rather than mortality) trends may reveal more telling information. For example emergency care and/or hospital admissions related to symptoms might tell a different story about disease incidence.

**Recommendation:** Triangulate data sources to facilitate an understanding of morbidity trends. We recommend using secondary data sources supplement the survey.

### 3. Data on Acute Myelogenous Leukemia is Not Reported by Age and Spans an Irregular Time Interval with Varying Levels of Oil Field Activity.

As stated in DPH's assessment, research has clearly connected acute myelogenous leukemia (AML) to benzene exposure. Benzene exposure, benzene vulnerability, and gender are some risk factors that increase your likelihood of facing AML. Yet, the assessment fails to report results along demographic information outside of race and ethnicity.

Furthermore, drilling activity has varied significantly throughout the history of the oil field (see graph below).<sup>34</sup> Based on oil field activity, AML rates would likely vary as drilling-related benzene exposure fluctuates. Reporting results over large time intervals limits researchers' ability to spot AML vacillations we would expect to change in response to oil field activity changes.

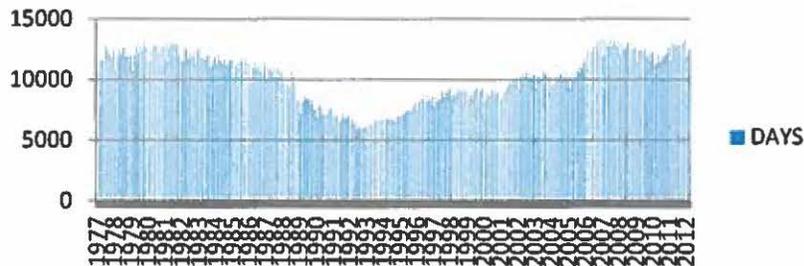
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<sup>33</sup> "GraphPad Statistics Guide." Web. 21 Aug. 2013.

<[http://www.graphpad.com/guides/prism/6/statistics/index.htm?stat\\_key\\_concepts\\_statistical\\_power.htm](http://www.graphpad.com/guides/prism/6/statistics/index.htm?stat_key_concepts_statistical_power.htm)>.

<sup>34</sup> Department of Conservation. Division of Oil, Gas, and Geothermal Resources. Online Production and Injection data. Accessible via: <http://opi.consrv.ca.gov/opi/opi.dll>

## DAYS OF CUMULATIVE WELL OPERATION FOR INGLEWOOD OIL FIELD



**Recommendation:** Enable greater detection of benzene-related AML by reporting AML rates over smaller time increments and comparing those rates to oil field activity levels.

### Exclusion of Health Working Group Comments and Recommendations

#### 1. Unsatisfactory Utilization of the Health Working Group

The Health Working Group meetings were abruptly cancelled after two meetings without a clear explanation of the cancellation decision. Secondly, the Health Working Group was not notified of how comments were considered in decision-making or integrated in the study's design. While the assessment includes many of the Health Working Group comments, it does not have many substantive recommendations the DPH had committed to responding to, including a DPH commitment to discuss access to health care and insurance.

**Recommendation:** To allay community concerns and engage community members in constructive dialog with researchers, recommendations from community groups must be encouraged and included.

### Conclusion

There is clear evidence locally, nationally, and globally, that industrial sources of exposure to a variety of pollutants similar to those found in the oil field can and do have significant health impacts. The health and safety of areas surrounding the oil field—communities with schools, day cares, nursing homes, and hundreds of thousands of residents—continues to remain an area of significant concern for our organization, partners, and stakeholders. In fact, the mere perception of an elevated risk has caused increased stress in the community – a significant public health impact. Furthermore, the conditions of the July 2011 Settlement Agreement requires DPH to conduct an Environmental Justice Study with an analysis of socio-economic and demographic data. However, most results are not adjusted by socio-economic status and the report does not contain a discussion or analysis of environmental justice anywhere in the Inglewood Oil Field Communities Health Assessment or Inglewood Oil Field Communities' Survey. A good-faith effort to address and study environmental justice concerns must be made in DPH's study to comply with the terms of the Settlement Agreement. We urge immediate

initiation of a supplemental assessment to replace the 2012 Community Health Assessment since the original assessment does not appear to meet the settlement terms.

Community Health Councils calls on the County and the Department of Public Health to prioritize work and allocate funding for a supplemental assessment to address the specifications in the CSD, correct the short falls in the methodology as well as continued monitoring and evaluation of potential health impacts arising from exposure to oil field activities. We view the supplemental assessment as a requirement of the Settlement Agreement and the ongoing monitoring and evaluation as a matter of duty to protect the health and welfare of Los Angeles County.

If you have any questions, please do not hesitate to contact me by email at [Lark@chc-inc.org](mailto:Lark@chc-inc.org) or by telephone at (323)295-9372. Thank you again for the opportunity to comment on this time sensitive issue.

Respectfully submitted,



Lark Galloway-Gilliam, MPA  
Executive Director  
Community Health Councils

CC:

Honorable Supervisor Mark Ridley-Thomas  
Richard Bruckner, Director of Los Angeles County Department of Regional Planning  
Elaine M. Lemke, Los Angeles County Counsel

## APPENDIX C



# SWPA-EHP

SOUTHWEST PENNSYLVANIA ENVIRONMENTAL HEALTH PROJECT

[www.environmentalhealthproject.org](http://www.environmentalhealthproject.org)

### EHP's Perspective on the Inglewood Oil Field Communities

The Southwest Pennsylvania Environmental Health Project applies a public health sensibility and methodology to the health risks associated with unconventional natural gas development activities (UNGD).<sup>1</sup> While our organization was designed specifically for this environmental health threat, our conceptual framework and strategy can be applied to other circumstances and other settings, including that of the Inglewood oil fields.

EHP's work combines medical expertise, careful attention to scientific evidence, and personal in-depth interviews with residents who believe their health has or could be compromised by exposures generated by the natural gas industry. Aspects of our work are similar to work being done by the Los Angeles Collaborative for Environmental Health and Justice. A distinguishing feature of the Southwest Pennsylvania Environmental Health Project (EHP), however, is the medical foundation brought by our team physician and nurse practitioner.

Lengthy interviews are conducted by EHP's nurse practitioner who often meets people in their homes, allowing her (and our team) to understand the whole health experience of the residents. These home visits give us a window into an individual's surroundings, families and even pets or farm animals. The interviews are structured and are one component of our overarching environmental health strategy. The nurse practitioner begins each visit by listening to the residents' perceptions of their environmental risks and their health concerns. After that critical interaction, a comprehensive intake interview is conducted.

In tandem with our health assessment, we investigate environmental exposures at the individual level. We have access to monitoring devices for air and water and put these tools in the hands of local residents when possible. Individual information shared with our nurse practitioner, coupled with air and/or water contaminant analyses and a continual review of the scientific literature, provide us with the ability to give practical, actionable guidance and recommendations to individuals and families in the region and beyond.

We read with great interest the Community Health Councils' response to the February 2011 *Inglewood Oil Field Communities Health Assessment*. The circumstances that these communities find themselves in, their stated concerns, and unanswered questions are quite familiar to us. The LADPH study clearly fell short of the communities' expectations and their needs and the CHC appropriately identified the Assessment's limitations. While there are SES and geographical differences between the populations

at risk in Inglewood – Baldwin Hills and in Southwest Pennsylvania, our experience leads us to the same concerns raised by CHC. The small (and perhaps diluted) sample, lack of attention to length of residency, and use of race as a proxy for SES call into question the LADPH's findings. To these and others that have been raised by CHC, we would like to add a few concerns of our own.

#### Potential for harm

Like many public agencies, the Los Angeles Department of Public Health based its Assessment on the data that was readily available to it. While some of these datasets – including low birth weight, birth defects and asthma mortality – are highly relevant to the contaminants individuals may be exposed to, the overall array of mortality and cancer data does not reflect an appreciation for what these communities' widespread risks might be. One of our greatest concerns is that the actual risks are inadequately represented in the datasets employed in the Assessment. Across the country, in communities with shale gas drilling and other related activities we see many of the same (neurological, gastrointestinal, dermatological, respiratory) health effects. Because we know some of the industry's emissions and the plausible routes of exposure, we feel confident in linking exposures and poor health in those living close to UNGD activity. We began our work by talking to people one-on-one in their own settings. Their self-reports and the known emissions from facilities around them informed our thinking on potential health risks. Respiratory illness not resulting in death; increases in asthma incidence; upper respiratory infections; nose bleeds; and skin rashes are frequently reported in UNGD areas and the literature. They might be among the likely health impacts of the nearby emissions from the Inglewood oil fields as well.

CHC rightly pointed out that the LADPH report adjusted for race, but not always for income and education, which then influences the conclusions drawn from the data. As a result, the environmental effects on the health of African American residents of Baldwin Hills may be underestimated. It is interesting to see (and we have not looked into this) that on several measures Caucasians in the Inglewood – Baldwin Hills communities fare worse than their counterparts county-wide. This is the case for breast cancer, colorectal cancer, diabetes, lung cancer, pneumonia/influenza, and stroke. While no causal claims can be made at this point, the disparities are worth keeping an eye on.

#### Variability in exposures

CHC's point about the sample buffer not being part of the likely travel and contamination patterns of pollution is a very important one. Even if a residence or neighborhood is directly downwind from a source, there is reason to be cautious about reports of no or little exposure. Over the last couple of years we have devoted a good deal of time and energy to understanding the industry's emissions and nearby residents' exposures. Experience has shown us that the most critical aspect of understanding exposures in settings like Washington County, PA and the Inglewood – Baldwin Hills communities is *variability*. We base our own exposure assessments on the following claims:

- Human exposures to air contaminants are primarily affected by six things: the emissions levels and content; weather patterns which affect air mixing and the disposition of pollution; and the intensity, duration, and frequency of *peak* exposures.
- Therefore, in most circumstances, individuals experience variable exposures over time.
- Physiologically, high levels of exposure (even if short-term) are generally more damaging than low exposures.

These fundamentals put many environmental health questions into perspective. In terms of measuring exposures, it is vitally important to capture and recognize the exposure peaks. That requires strategically measuring at times when emissions are reaching the monitoring site. Exposures are most consistent within a few hundred yards of the source, thus can be more reliably measured. Further than a few hundred yards from a source, one would want to make sure the monitoring site is downwind from the source and that weather conditions hold the emissions nearby and close to the ground. Otherwise the exposures might be missed. This strategy might mistakenly be considered “cherry picking” by some researchers. But if the goal is to understand risk to human health – and much of that risk is generated by peaks not averages over time – capturing high exposures is essential to understanding risk. EHP believes that careful, vigilant monitoring by community members in their own homes is a critical asset. It provides residents with important information (sometimes real-time) that they can use to protect their own health and it provides community groups and public health professionals with data that can be used to protect at risk neighborhoods.

### **Case-based approach**

Our case based approach incorporates, but is not limited to, traditional epidemiology and risk assessment findings. It provides a basis for the design of more meaningful public health studies and interventions. It also generates an ongoing assessment and response process, grounded in the documentation of health conditions by either our nurse practitioner or physician. While being developed in southwest Pennsylvania, it is our belief that this model can and should be incorporated widely as an integral part of community based public health practice.

4209 Jackson Avenue  
Culver City, CA 90232  
April 28, 2014

Richard Bruckner, Planning Director  
Los Angeles County  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012

**RE: Baldwin Hills Community Standards District Periodic Review Draft Report**

Dear Richard Bruckner,

I am writing to comment on the Public Draft of the Baldwin Hills Community Standards District for the Community Standards District Periodic Planning Director Review. I have to first say that I am deeply disappointed in the cavalier and mendacious approach the County and Marine Research Specialists have taken in preparing the review without any supporting documents in an appendix. Without supporting documents this review is without credibility and therefore needs be redone and re-circulated. I will cite numerous examples of this.

**4.0 Analysis of the CSD Provisions**

With public concern over the possibility of directional drilling under there residential homes the review does not confirm this is in fact not the case but confuses the public with the statement that the County and operator have confirmed that no surface or bottom hole well locations have been drilled outside the DOGGR established boundaries of the CSD Inglewood Oil Field.

The boundary of the CSD was established by the County of Los Angeles and not by DOGGR as you would have people believe with this syntax misdirection. The Administrative Boundary of the Inglewood Oil Field was established by DOGGR and would include locations outside the Unincorporated Los Angeles County CSD surface area of the oil field into and under residential neighborhoods.

The review failed to provide a map of the oil field containing these distinctions and Key.

### **E.1 Community Alert Notification System (CAN)**

No complaints regarding annual operation of the CAN system.

No documentation of numbers of area residents contacted and alerted successfully.

### **E.2 Air Quality and Public Health**

Regardless of the Air Monitoring provisions thermogenic gases along with enhanced recovery additives, such as methanol continue to permeate adjacent residential neighborhoods on a continuous and transient basis.

Reference to the October 2012 South Coast Air Quality Management District Notice of Violation. Again absolutely no supporting documentation or even the NOV Notice number or the information that it lead to a prosecution and requirement of the operator to incinerate hundreds if not thousands of cubic yards of soil contaminated and venting over 50 PPM of VOCs into the air surrounding the oil field into residential neighborhoods.

AQMD 430 no documentation of breakdowns included in assessment only opinions that no changes are needed.

All incidents of spills and breakdowns cited should include documentation not simply text references.

### **E.4 Geotechnical**

The Ground Movement Surveys have been complete whitewashes of the actual operations of the oil field causing the acute ground movement particularly the Overhill Graben, which was identified in the 1976 Castle & Yearkes "Recent surface movements in the Baldwin Hills, Los Angeles County, California" USGS Professional Paper 882, as seeing movement as the result of the enhanced recovery (waterflooding) operations in the Inglewood oil field. MDA Geospatial Services InSAR imagery of the area of the Inglewood oil field indicate the ground movement has a direct relationship to enhanced recovery volumes and pressures being used by the operator. Both the County and DOGGR evaluations of the CSD required studies border on the criminal.

### **E.5 Noise Attenuation**

The Settlement as an agreements stands if the settlement indicates eleven noise monitoring sites should be being operational there should be an additional five should be added ASAP as the County and Operator are in non-compliance and have breeched the Settlement Agreement.

### **E.11 Oil Field Waste Removal**

The review contends that the operator does not use sumps or mud pits and yet there is clear documentary evidence that mud pits have been being used.

No description of documentation of the Soli-Bond facility or operation.

See attached.

### **E.26 Drilling, Re-drilling and Reworking Operations**

The oil field area that is closest to La Brea and the Windsor Hills continues to see the continuous presence of multiple rigs operating at any one time and is being unfairly impacted by this practice the Annual Drilling Plan was meant to prevent. This complaint has been articulated for years and is not a recent complaint.

### **F.1 Environmental Compliance Coordinator**

Conflict of interest having the County Consultant, MRS employee Luis Perez acting as the ECC is clearly a conflict of interest and should be contracted out to an independent representative with the qualifications to do the job honestly and effectively to promote the health and safety of workers and the residents surrounding the Inglewood Oil Field.

A copy of the implementation handbook detailing the responsibilities of the ECC would be greatly appreciated by CAP members.

This review failed to mention the Federal EPA violation issued in 2012 to PXP.

### **G.2 Draw-Down Account**

I have reason to believe that the Drawn Down Account may have been used to cover the costs of the mailing of a letter to almost 24,000 residents by Planning Director Richard Bruckner stating that hydraulic fracturing is not being used in the Inglewood Oil Field during the recent State Assembly Special Election in which County Supervisor Mark Ridley-Thomas' son Sebastian Ridley-Thomas was a candidate.

This review also continues to state that hydraulic fracturing is not being used in the Inglewood Oil Field when in fact it is during HRGP High Rate Gravel Packs and was identified as such by John Pierson of Marine Research Specialists, the County's Environmental Consultant. It is true that High Volume Hydraulic Fracturing is not being used at this time but is certainly slated for the future in the Inglewood field.

### **J.1 Community Advisory Panel (CAP)**

Conflict of interest statements should be required to assure the public that representatives chosen by the County are not influenced by contributions made directly by the operator as a Community Benefit to non-profits, civic associations, HOAs, etc on which they sit as members.

**Please included all suggestions I made contained in the Appendix as a CAP member.**

**Thank You.**

**Sincerely,**

**Paul V. Ferrazzi**

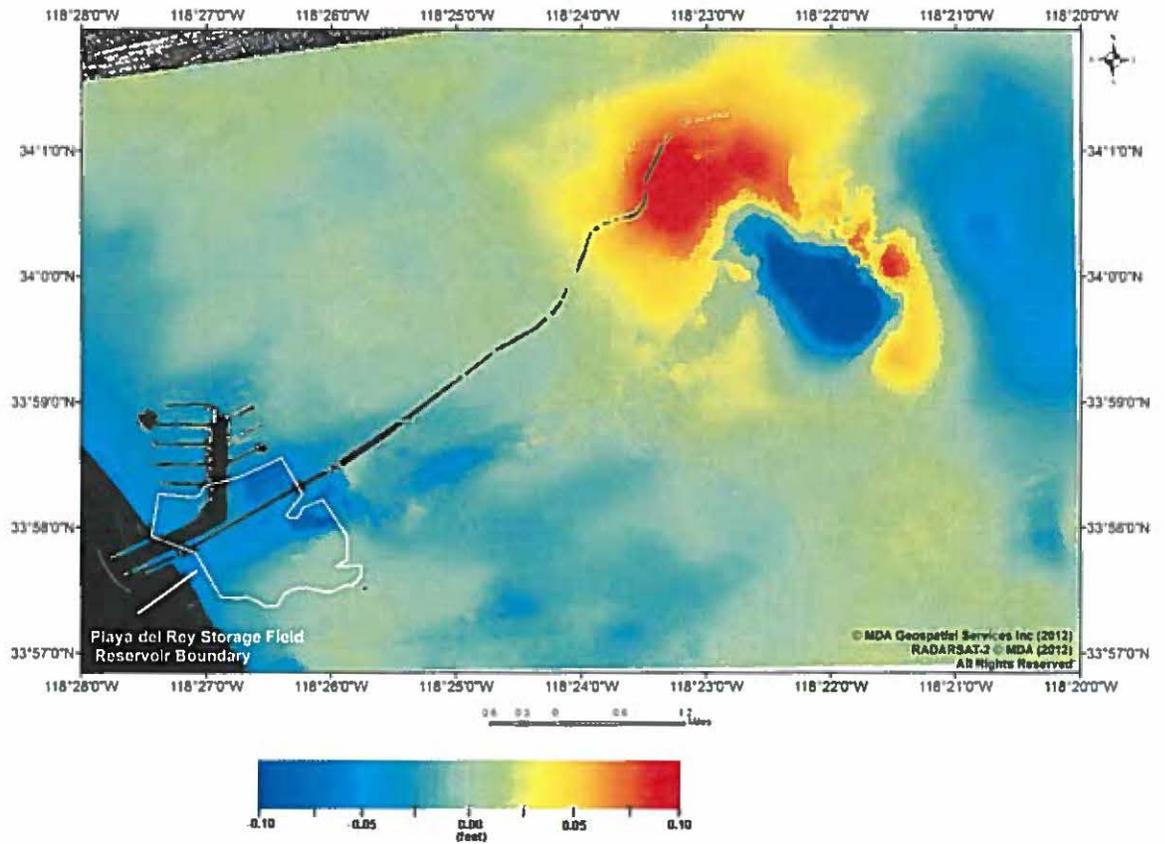
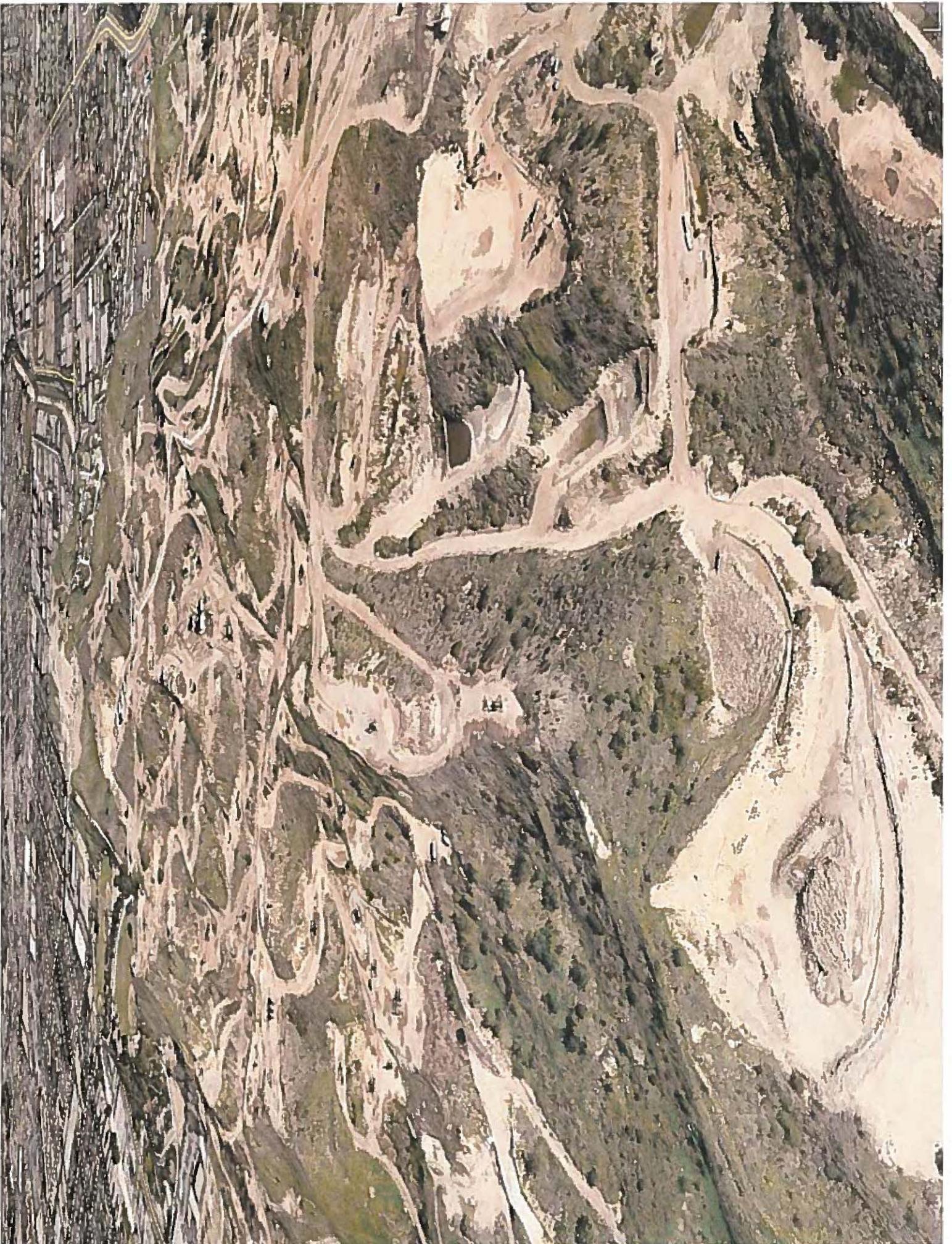
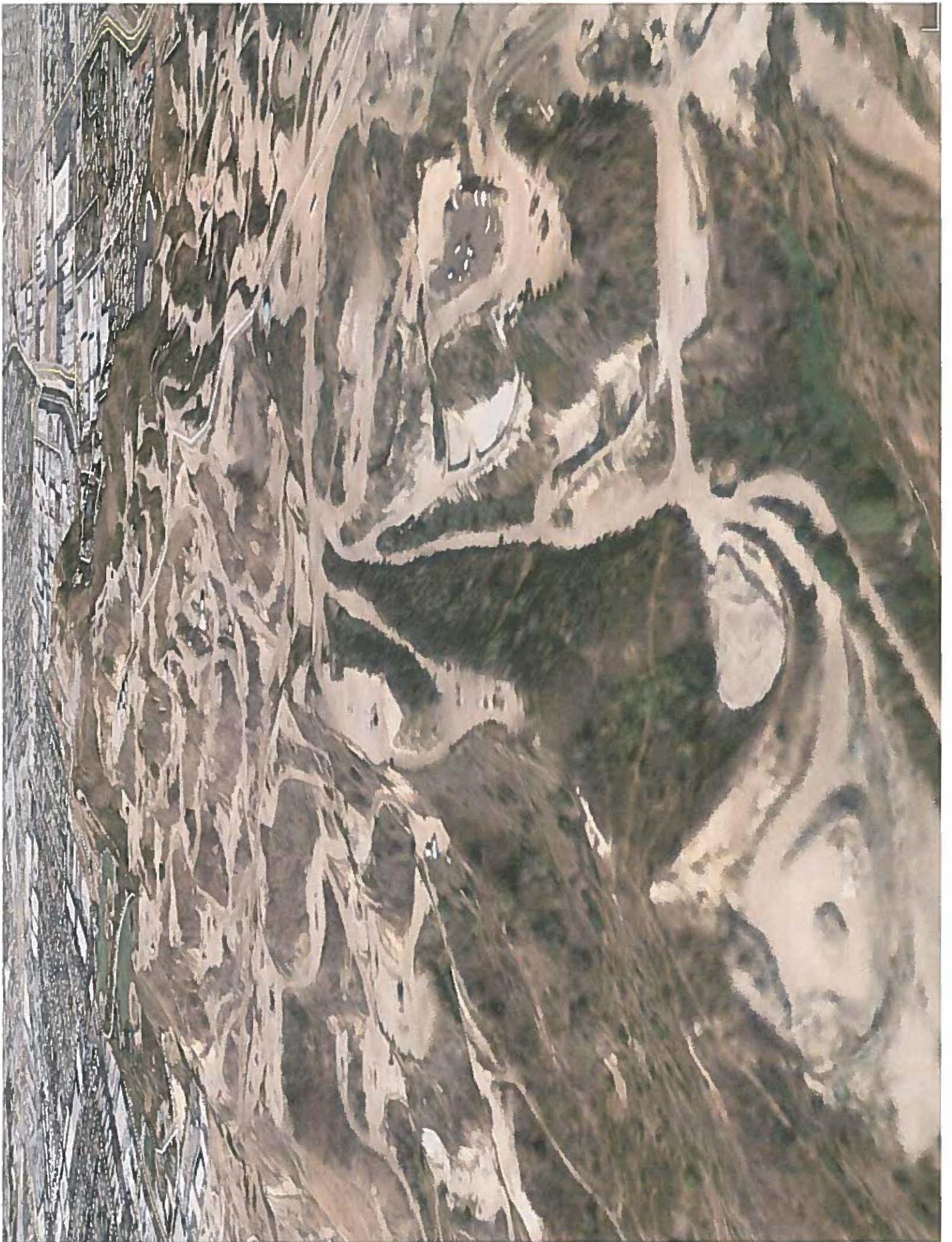


Figure 11: Playa del Rey Gas Storage Field AOI and surrounding area. Color representation of the cumulative vertical deformation from May 27, 2008 to June 23, 2012 superimposed onto SAR image.











David F. McNeill  
3521 Olympiad Drive  
Los Angeles CA, 90043  
dfmcneill@sbcglobal.net

April 25, 2014

Mr. Richard Bruckner, Director  
Los Angeles County Department of Regional Planning  
320 W. Temple Street,  
Los Angeles, CA 90012

Via email: [tstapleton@planning.lacounty.gov](mailto:tstapleton@planning.lacounty.gov)

Re: Baldwin Hills Community Standards District Periodic Review

Dear Director Bruckner:

I am writing to contribute to the overall strengthening of the Baldwin Hills Community Standard District (CSD) and to improve the methods by which the County can collaborate with the oil field operator, community members and the regulatory agencies involved in protecting the well being of those who live, work and recreate in the region. Over the past five years, the CSD's implementation has generated some important improvements, from the utilization of California Air Resources Board certified diesel catalysts to reduce emissions from drilling rigs by up to 90%, to a mandatory habitat restoration plan that replaces native coastal sage scrub and other sensitive habitat areas lost to new construction. These are indeed milestones worth noting. Unfortunately many provisions, such as the Odor Minimization Plan, have fallen short of their intent, resulting in consistent odors associated with land treatment units in close proximity to recreation facilities. While the language in the ordinance puts forth a series of thoughtful objectives, the successful implementation of those objectives is where the substance of the policy takes place. During the review process, it is imperative the Department of Regional Planning give serious consideration to sound input from area stakeholders with an interest in the future of the region. Many of us have participated in the Community Advisory Panel (CAP) and are intimately familiar with the ordinance's limitations and potential. The purpose of the comments below is to add to the collective goal of moving closer to an effective ordinance that continues to improve day-to-day conditions for those impacted by the oil field operations.

#### Implementation of Data Collection and Analysis

The CSD has mandated several studies at a cost to the County and the operator. A continual theme resonating as a result of the studies is the lack of credibility and or diligence the public detects in their delivery and development. This has had a crippling impact on the knowledge base needed to better inform the public and the operator on issues concerning,

ground movement, health, air quality, and ultimately planning. For studies that are of a critical public nature, resources should be committed towards contracting with independent experts from educational institutions dedicated to health or science. Methodologies for research and modeling should be developed in a collaborative manner to determine the best course of action without the perceived influence of bias or special interest.

E.4 Geotechnical, (e) Ground Movement: The Ground Movement Survey frequency should be increased to a semi-annual basis and analysis should be coordinated with federal and state geological survey agencies. Currently, the survey period for the CSD is one year with data collection taking place during the calendar year beginning in January and concluding in January the following year. Analysis of the data collected during the calendar year has been delivered in a report typically submitted in August, approximately eight months later. By increasing the frequency of the analysis to twice a year, there would be more opportunities to re-evaluate the granularity of data needed to assess trends and or provide earlier intervention against elevation changes that might be detrimental to surface infrastructure. There is precedent for semi-annual analysis as established by the City of Long Beach with their Subsidence Control Division for the Wilmington Oil Field.

E.7 Biological Resources, (d) Pre-Construction Surveys: All surveys listed under section (d) are currently conducted exclusively in sensitive habitat areas targeted for construction. The sensitive plant and wildlife species identified in the CSD Special Status Species and Habitat Protection Plan should all be surveyed in the coming year for a baseline of data regardless of construction. Advance survey work in all the habitat areas would allow for a more comprehensive restoration and re-vegetation plan that can address future projects that benefit both the operator and the environment i.e. slope stabilization, erosion control, storm-water management and green house gas reduction. The baseline survey data would have no impact on future construction or development in habitat areas due to the fact construction is allowed in sensitive habitat areas under the terms of the CSD.

E.18 Water Management Plan: The implementation and use of new technology can help reduce consumption and achieve better water use efficiency. Smart irrigation systems, solar powered timers, recycled water (purple pipe), are all opportunities to conserve water throughout Southwest L.A. County. As drought conditions continue in California, investment in innovative systems will lead to cost savings as well as a more reliable water supply. The infrastructure for delivering recycled water to the Baldwin Hills area is approximately one mile away. Federal, State and County resources should be leveraged to develop a plan in

conjunction with area stakeholders and the operator to deliver reclaimed water to the region.

E.19 Groundwater Monitoring: The recommendation for a network of up gradient wells to be installed in or around the oil field's perimeter to compliment the existing groundwater monitoring wells should be a part of the CSD implementation. This request should be put forth to make the ground monitoring program acceptable by the director, in addition to being consistent with the Regional Water Quality Control Board recommendation. The more data is made available at various locations of the water table, the better the understanding of the characteristics of ground water in the area.

#### Management of Odors, Waste and Dust

E.2 Air Quality and Public Health, (g) Odor Suppressant for Bioremediation Farms: The implementation of the odor suppressant program did not achieve the stated objective of ensuing no odors from operations could be detected at the outer CSD boundary. A revised strategy that either improved the odor suppressant process from start to finish, or re-located the bioremediation farms to more remote areas, would achieve the ordinance's objective. In 2012, prior to the SCAQMD Notice of Violation, hydrocarbon impacted soil delivered to the bioremediation farms at LAI (N) and LAI (S) had generated strong odors during handling. Specifically, odors had been reported by park users and staff during soil removal from truck beds and spreading activities at a land treatment unit adjacent to the parklands. These odors impact recreation facilities outside the outer CSD boundaries including Kenneth Hahn State Recreation Area's Eastern Ridgeline and the Yvonne B. Burke Sports Complex.

E.11 Oil Field Waste Removal, (c) Waste Discharge: The implementation of the best practices developed to manage waste from drilling and reworking in metal or plastic bins should be acknowledged by reference as a guideline requirement. Based on the operator's current practice of containment of all waste from drilling, re-drilling and reworking activities in bins, there is no need for leaving the option for use of ground sumps or pits.

E.11 Oil Field Waste Removal, (p) Fugitive Dust Control Plan: The Fugitive Dust Plan approved by the director in 2009 should include additional measures to address mud after a rain event. A revised program that reduces the amount of moist soil leaving the oil field would lower the impacts on busy routes of travel i.e. Fairfax Avenue and Stocker Street. More frequent street cleaning along those routes during the dry days following a rain event would also reduce the amount of dust generated when the remnant soil dries.

## Communication and Coordination

G.8 Multiple Agency Coordination Committee: Direct public communication with the entire MACC should take place at least one time a year. Over the course of the CSD, individual agencies participating in the MACC have presented at CAP meetings. These presentations have been informative and should continue, however the opportunity to have a discussion with the multiple agencies that have cross jurisdictional authorities would provide the best possible forum to learn how the regulators and first responders work together.

J.1 Community Advisory Panel (CAP), (a) CAP Members: The CAP should be re-constituted to include more representative appointees and expedited replacements on an as needed basis. The CAP's effectiveness has suffered due to the lack of attendance by its members and few appointments being made by the director in an expedited manner. Representatives for landowners, neighborhood associations and at large community members with an interest in serving should have a clear path to nomination with a timely vetting and response from the director. Communication at meetings is important to improve awareness of the operations involved in oil drilling. Ongoing education on land rights, drilling procedures, safety protocols, infrastructure upgrades and environmental quality monitoring activities help foster critical relationships and manifest collaborative outcomes. It is important to note that outreach is a shared responsibility and is not the sole purpose of the CAP. The CAP relies on the Department of Regional Planning for a web presence, distribution of materials, mailings and notifications. More resources should be deployed by the department because the reach of the County is far more extensive than any individual community organization and its members.

Thank you for the opportunity to comment on the CSD. The ordinance clearly seeks to create some compatibility between a 90 year old oil field and a growing population of environmentally conscious people. The success of its implementation rests in the hands of the Department of Regional Planning.

Sincerely,



David McNeill  
Community Advisory Panel Co-Facilitator  
Baldwin Hills Community Standards District

**KENNETH L. KUTCHER**

10715 Lugo Way  
Culver City, CA 90230

(310) 451-3669  
kutcher@hlkklaw.com

April 25, 2014

**VIA E-MAIL**

Department of Regional Planning  
Attn: Timothy Stapleton, Zoning Enforcement West  
320 W. Temple Street,  
Los Angeles, CA 90012

Re: Initial Periodic Review (February 2014 Public Draft)  
Baldwin Hills Community Standards District  
Our File No. 9065.2

Dear Mr. Stapleton:

I am a resident of Culver Crest. This letter is submitted to comment on the February 2014 public draft of the County's Baldwin Hills Community Standards District Periodic Review.

This first Periodic Review misses an opportunity to address important public policies related to the future of the Inglewood Oil Field. The technical analysis provided in the County's draft report does not take into account the long-term unparalleled opportunity to convert this unimproved raw blighted land into a critically needed urban park.

Strategies for reducing the footprint of the oil field, winding down or compacting the exploration, using new and improved technologies, creating greater opportunities for public acquisition and/or access, cleaning up existing contamination, ensuring against risks of future disasters, establishing a sunset horizon for production, imposing a long-overdue production tax that should be used to fund parkland expansion, and empowering surrounding residents should be vigorously explored at each five year milestone.

**BACKGROUND**

The Inglewood Oil Field is the largest urban oil field in the nation. When the oil operations began in 1924, the area was primarily farm land. The surrounding land that once supported crops and livestock is now home to more than one million residents within a five mile radius. The oil field and its operations and the County land use policies and regulations must reflect that there are numerous established residential neighborhoods surrounding the oil field.

Oil and gas are no longer as readily recovered from the oil field as they once were. So-called "enhanced recovery techniques" are now required. These operations

## KENNETH L. KUTCHER

10715 Lugo Way  
Culver City, CA 90230

(310) 451-3669  
kutcher@hkklaw.com

involve high pressure injection of water into the earth to extract the oil and gas from reservoirs located generally between 1,000 and 10,000 feet beneath the surface.

Researchers believe that as secondary recovery become more widespread, waterflood operations may be accompanied by an increase in the potential hazard of earthquakes, as has occurred elsewhere.

Over the last 90 years of oil drilling and production, there have also been numerous instances of contamination and other health hazards.

### THE NEED FOR MORE PARKLAND

The area surrounding the Baldwin Hills is one of the most park-poor urban areas in California, with less than one acre of park space per 1000 people, far below the nationally-recommended standard of 6 to 10 acres per 1000 people.

The Baldwin Hills represent one of the last largely undeveloped areas of open space in urban Los Angeles County. Over one million people live within five miles of the Baldwin Hills, and, with barely one acre of parkland per one thousand people, this is one of the most park-poor regions in California. The Baldwin Hills present a unique opportunity to enrich the lives of millions by creating one of the most dramatic new parks in an urban setting desperately in need of critical park space.

In 1999, the State Legislature passed Senate Bill No. 1048 (Murray, 1999) declaring the Legislature's intent to provide for the expansion of the Kenneth Hahn State Recreation Area in the Baldwin Hills. This legislation contemplated the development of a master plan to accomplish the following goals: (A) increase active recreation opportunities for underserved communities, (B) create a comprehensive trail system, (C) provide for public access and entry ways, (D) protect and restore natural habitat, (E) protect critical viewsheds, (F) protect and improve urban water quality, (G) emphasize connections between existing parks, trails, and urban streams, (H) restore industrial lands to park and open-space use, and (I) protect watersheds connecting to Santa Monica Bay. This legislation assumes eventual conversion of the Oil Field into the largest urban park created in the last century anywhere in the nation.

After an extensive public process, the Baldwin Hills Park Master Plan was adopted pursuant to Public Resources Code Section 32565.5(f). The stated purpose of the Baldwin Hills Park Master Plan is as follows:

"The purpose of the Baldwin Hills Park Master Plan is to serve as a guide for future natural open space and parkland acquisition and improvements, facility development and habitat restoration within the Baldwin Hills, and for connections to trails, parks and other public facilities."

**KENNETH L. KUTCHER**

*10715 Lugo Way  
Culver City, CA 90230*

*(310) 451-3669  
kutcher@hlkklaw.com*

The Park Master Plan envisions preservation and restoration of natural habitat along with the development of active and passive recreational facilities and education and cultural facilities, including the following: approximately 300 acres of protected and restored natural lands; over 60 acres of multiple-use (softball, baseball, soccer) fields; a 120-acre/18-hole golf course; a tennis center, skate parks, over 15 miles of jogging, bicycle, and hiking trails; playgrounds; indoor basketball courts, a recreation center and gymnasium, a par course, and climbing wall; and a competition-sized swimming pool.

The CSD is located within the area encompassed by the Baldwin Hills Park Master Plan.

**CSD PERIODIC REVIEW COMMENTS**

In light of the foregoing, the CSD Review should look towards how to better implement public policy related to the Inglewood Oil Field. This should include:

- reducing (over time) the footprint of the oil field, through a combination of restrictions and incentives;
- winding down or contracting the drilling/exploration over time;
- due to its unique circumstance as the largest urban oil field in the nation, compelling the use of cutting-edge, newer, quieter, cleaner, smaller, safer and improved technologies in drilling and production activities even if they might not be as cost efficient as are used in other smaller or less urban oil fields;
- creating greater opportunities for public acquisition and/or public access to the existing vast oil field land for greater parks and open space;
- locating, identifying, cleaning up and certifying existing contamination and reducing or eliminating risks of further contamination throughout the oil field, including from prior abandoned well sites;
- ensuring against risks of future disasters through increased and improved monitoring, contingency planning, intra-agency communication, and dramatically increasing the CEO's financial bonding/insurance requirements to levels that truly reflects the levels of risk posed by existing operations and eventual clean up upon ultimate closure of the oil field;
- establishing a realistic sunset horizon for oil and gas production from this urban oil field and developing strategies to implement that transition;
- imposing a long-overdue production tax that should be used to fund parkland expansion; and

**KENNETH L. KUTCHER**

*10715 Lugo Way  
Culver City, CA 90230*

*(310) 451-3669  
kutcher@hlkklaw.com*

- empowering surrounding residents to remain informed, engaged and responded to.

Sincerely,



Kenneth L. Kutcher

9065\Cor\Stapleton.2001a.KLK.docx

BALDWIN HILLS CSD  
COMMUNITY ADVISORY PANEL (CAP) MEETING  
Minutes April 24<sup>th</sup>, 2014  
DRAFT

**A. Call to Order - 7:00 PM**  
David McNeil Chair.

**B. Announcement of Agenda**  
Approved.

**C. Regional Planning/ECC Update – Tim Stapleton**  
**Compliance Document Submittals** Mr. Stapleton noted the compliance documents that have been uploaded to the web site; First Quarter 2014 Groundwater Monitoring Report, First Quarter 2014 Complaint Log. Mr. Stapleton briefly discussed the Stocker Slope Restoration Plan and that the plan has been approved by DRP.  
**Periodic Review** Mr. Stapleton announced the periodic review comment period ends Monday April 28.  
**Air Quality Study Report** will be provided next month approximately a week before the May CAP meeting. The report will be presented at the CAP meeting by the consultant that completed the study.

**D. Operator Update – Laura Vlk**  
**Drilling Update** Ms. Vlk noted 10 new wells have been drilled to date in 2014 and that there are currently no re-working rigs on the field. No changes to drilling plan have been made to date.  
**Compliance Document Submittals** Ms. Vlk listed the recently submitted FM O&G compliance documents; First Quarter 2014 Groundwater Monitoring Report, First Quarter 2014 Complaint Log, and the Stocker Slope Restoration Plan.  
**1<sup>st</sup> Quarter Complaint Log** Ms. Vlk summarized the complaints by type; 7 odor complaints, 5 noise. Mr. Gless asked about maintenance rigs, Ms. Vlk did not have that data available. Ms. Sahli-Wells asked about the Culver City police noise complaint; Ms. Vlk checked the log and provided additional information about the screeching sound in the complaint. The cause was a broken Pitman arm on an operating well, the well was repaired and returned to service. Ms. Steva asked about whether the broken well equipment noise was captured on the noise monitoring equipment and Ms. Vlk noted that the noise monitoring equipment is set up to monitor drilling activities. Ms. Vlk further noted that FM O&G operators would have found the noisy equipment during normal field rounds if a noise complaint had not been filed.  
**Stocker Slope Restoration** Mr. McNeil asked about the schedule for the project, Ms. Vlk noted that permits are under review at County Building & Safety/Public Works. FM O&G is planning to start as soon as possible to allow for the planting activities to occur during the winter time frame.  
**Question on AQMD Issue** Mr. Ferrazzi asked about AQMD enforcement action update, Ms. Vlk did not have any updated information on the subject.

**E. Periodic Review Update – Tim Stapleton/Luis Perez**  
**Process Overview** Mr. Stapleton referenced a summary table of comments made to date is available to the CAP. Mr. Perez noted that there would not be presentation on the periodic review but rather an open forum for the public to provide comments on the document. Members of the public were invited to voice comments and or write comments down on an easel for discussion. Mr. Perez further noted that comments could continue to be submitted via email or letters up through the end of the comment period on April 28. Mr. Perez outlined the remaining steps in the periodic review process; a final report will be prepared with additional data and include the comments received, the report will go before a County hearing officer at which the public will have the opportunity to make additional comments.  
**Insurance/Bond Comment** Mr. Kuechle commented that he was expecting a presentation and a response to his previous comments to facilitate further discussion and comment on the document. Specifically, Mr. Kuechle's commented that the discussion in the review regarding the insurance and

bond amounts in provisions G.4 and G.5 is inadequate and the CAP needs data in order to discuss and comment on the issue; this was one of Mr. Kuechle's earlier comments on the document. Mr. Kuechle further noted that his comments on the subject were intended to allow time for additional information on the insurance and bond issues to be provided in the periodic review so that the CAP would have sufficient information to make informed comments on the document. Mr. Perez discussed the periodic review process and that comments will be addressed as part of the final draft document. Further, he noted, the insurance and bond issue is being looked at by both County Counsel and MRS and additional data will be in provided in the final document. Mr. Kuechle commented that the CAP should see some concrete information on the subject so that issues such as this one can be finalized as opposed to merely being discussed year after year.

**General Comments** Mr. Gless noted that the analysis seems to gloss over some of the concerns voiced by the public and appears to state there are no problems with the oil field; further he requested that the analysis should be revised. Mr. McNeil noted that the review concentrates on implementation improvements as opposed to language modifications. Further, he asked about the process regarding the Director of DRP and how the recommendation/changes in the document are made and that the review does not have any new requirements. Mr. McNeil note the recommendations need to have timelines such that they will happen as opposed to simply being a paper exercise.

#### **Specific Periodic Review Comments**

##### **Ms. Steva**

- CHC will be providing a comment letter.
- Strengthen the recommendations.
- Noted that the Air Quality Study was not conclusive and should be.

##### **Ms. Sahli-Wells** summarized the forthcoming Culver City comment letter:

- Prohibit fracking or other well stimulation methods until regulations are in place.
- Landscaping progress is behind schedule and is needed to screen oil field from Culver City.
- Oil field studies should be adequate, accurate, and funded such that they can be completed properly.
- Public noticing should be more comprehensive than CAP and web site.
- Request for a MACC and CAP combined meeting.
- ERP drills should involve neighbors because of fire danger.
- New technology should be explored further in the document.
- Insurance and bonding coverage and rational for the numbers should be provided.
- Cap membership attendance issue should be reviewed.
- Consolidate drill pads to allow for expansion of public open space.
- AB32 impact from drilling on GHG emissions and the State GHG goals is a concern of Culver City.

##### **Mr. Kuechle**

- Add key to cover sheet map.
- Map on page 4 should be larger and have a better key.
- Recommendations on page 10 should be requirements rather than recommendations; a "recommendation" does not really provide for any real enforcement or action. Specific provisions noted were E.4.e, E.15.a, E.19, and E.28.b, recommendation E.4.e should be required immediately.

**Horizontal Drill Paths\Mineral Rights Discussion** A member of the public and Ms. Sahli-Wells noted that there are area resident concerns on horizontal drilling paths and the potential for bottom hole locations to be under homes. A request was made for oil field boundaries, DOGGR boundaries, and CSD boundaries be explained with the idea that drilling may be occurring under residential homes. Mr. Perez referred the CAP to the EIR which provides several maps of the subject matter. Concerns were voiced about potential drilling paths that go under Culver City. Mr. Perez explained that the annual drilling plans contain both top hole and bottom hole locations for all wells drilled in the last 5 years or since the CSD. The drilling plans, however, do not include Culver City only those in the County. Wells prior to the CSD are noted and mapped in the EIR.

Ms. Sahli-Wells asked about the mineral rights issue and that mineral rights are separate from surface rights. Mr. Perez noted that owners of mineral rights have legal right to drill into those areas and those rights supplant the surface owner rights. Mr. Dusette noted that no bottom hole locations have occurred outside the Inglewood Oil Field since the CSD as detailed in the periodic review. Several commented that the Inglewood Oil Field boundary is different than the CSD and or DOGRR boundaries. Mr. Perez commented that additional information on the different boundaries will be added to the periodic review.

Mr. Shockley explained that in order to drill anywhere one needs to have the mineral rights. Several people commented that they do not own the mineral rights under their own homes, thus, they do not know what may or may not be occurring on the subject. Mr. Perez noted that the EIR contains a discussion on the mineral right subject and the operator's requirements for drilling. Mr. McNeil summarized the public's concern about drilling under homes and/or outside the boundaries of the CSD. Mr. Ferrazzi noted that the DOGRR maps contain information on the subject but are not a complete map of down hole locations from the top hole locations. A map available to the public was discussed and how one could be generated and distributed. Further discussion noted that a title search is necessary to research past mineral right documentation. Mr. Perez noted that surface owners are not necessarily notified if drilling is to occur under their property and directed the public to the EIR for the subject discussion. Ms. Sahli-Wells reinforced the concern that she and members of the public have regarding the horizontal drilling issue. Mr. McNeil concluded the discussion commenting that the public would like to know more about the drilling, various regulatory and reservoir boundaries, and surface versus mineral rights. Ms. Sahli-Wells requested that a map be added to the periodic review to provide the information.

A member of the public asked about forced pooling of mineral rights. Mr. Ferrazzi summarized the forced pooling issue and how a group of mineral right owners can be grouped together with a "vote" determining whether the resource will be explored. Mr. Keuchle commented that mineral rights owners receive royalties even if they voted against producing the resource. Mr. Shockley described pass through rights whereby a horizontal drilling operation would need to obtain permission from subsurface owners to drill through an area to reach an adjacent area. Mineral rights were further discussed and that the mineral right law is contained in the CA Civil Code. Mr. Perez reiterated that the EIR contains a thorough discussion on the mineral right/surface right issues. Mr. Stapleton noted that drilling permits are subject to zoning and other surface land use regulations and requirements.

**F. CAP/Open Discussion – David McNeil**

Ms. Spiva noted that the landscaping recommendation in the periodic review should be specific and set actual timelines because the progress of the landscaping at the oil field has been very slow to date. Mr. Perez noted that the settlement agreement extended the landscaping timelines and Mr. Stapleton reviewed the landscaping provision for the CAP.

Mr. Gless asked about the follow up geotechnical work being done at certain homes and the party responsible for the follow up studies. Ms. Vlk noted that the work is being done by a consultant through FM O&G.

**G. Public Comment – David McNeil**

Combined with CAP/Open Discussion, see above.

**H. Approval of Minutes – David McNeil**

March 2014 minutes approved with Michael Montgomery revisions and correction to landscaping status detail from Laura Vlk, FM O&G. Ms. Hsu noted that she is the new CAP member for the City Project.

**I. Announcement – Next CAP meeting May 22, 2014. Adjourn 8:20.**

ATTENDANCE: 4/24/14

(\*absent)

**DESIGNATED SEATS PER 22.44.142.J.1.a*****Governmental Entities***

1	Department of Planning	Timothy Stapleton
2	City of Culver City	Meghan Sahli-Wells
3	West Los Angeles College	Nabil Abu-Ghazaleh*

***Operator (per 22.44.142.C)***

5	Freeport McMoran Oil & Gas	Laura Vlk
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**NOMINATED SEATS PER 22.44.142.J.1.a****(Accepted first-come/first-served within each sub-group)*****Landowners (per 22.44.142.C)***

6	Vickers Family Trust	Roger Shockley
7	Cone Fee Family Trust	Nancy Snowden for Liz Gosnell*

***Neighborhood Organizations (Recognized Homeowners Association)***

8	Ladera Heights Civic Assoc.	Carmen Spiva
9	Windsor Hills HOA	Gary Gless
10	United HOA (View Park)	Catherine Cottles*
11	Culver Crest Neighborhood Assoc.	John Kuechle
12	Blair Hills HOA	Jon Melvin*
13	Raintree Community HOA	Bambi Njamfa*
14	Baldwin Hills Estates HOA	Ronda Jones*

***Neighborhood Organizations (No Recognized Homeowners Association)***

15	Ladera Crest Homeowner	Rene Talbott*
16	Baldwin Vista Homeowner	Irma Munoz*

***School Districts***

17	Los Angeles Unified	Glenn Striegler*
18	Culver City Unified	Katherine Paspalis*

***Neighborhood Organizations (All Others)***

19	Windsor Hills Block Club	Toni McDonald-Tabor*
20	Community Health Councils	Erin Steva
21	Baldwin Hills Conservancy	David McNeill
22	The City Project	Daphne Hsu

## Timothy Stapleton

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**From:** darryl burns [dburns602@gmail.com]  
**Sent:** Thursday, April 24, 2014 12:07 PM  
**To:** Timothy Stapleton  
**Subject:** Baldwin Hills CSD Periodic Review Report

Tim:

I won't be attending the meeting tonight due to a conflict. I read the report and there were a few things I wanted to let you know about. The first one is a typo - an easy fix. It is: (1) G.8 - Multiple Agency Coordination Committee ("MACC").

On page 122, 3rd paragraph entitled Analysis of Compliance and Effectiveness - the first sentence states that the first MACC meeting was held on May 13, 2009. The next sentence states that subsequent meetings were held on *March 16 & April 20, 2009* - both dates which precede the stated first meeting date of May 13, 2009 (lead sentence). Research the dates and make changes accordingly; (2) During the meeting on March 27 there was a question posed to the FMO&G

Ombudsman (Ms. Lisa Paillet) if FMO&G had ever had a wellbore cross a fault zone or line. She declined to answer, which bodes the question - is that non-answer a tacit "Yes"? FMO&G should be compelled to answer that question for themselves, PXP & Chevron by either DRP, DOGGR or your combined forces with the support of the DA and AG so that the public will know. I'm sure that the ultimate response would be quite interesting with attendant downstream consequences.

I'll make the May meeting.

Thanks.

*Darryl Burns*  
*Legal Committee - Angeles Chapter*  
*Sierra Club*

## Timothy Stapleton

---

**From:** J.E. Brockman [bc534@lafn.org]  
**Sent:** Tuesday, April 22, 2014 12:02 PM  
**To:** Timothy Stapleton  
**Subject:** Periodic Review Comments

Dear Mr. Stapleton,

It's clear that Freeport McMoRan, aided and abetted by the Department of Regional Planning is obfuscating on too many fronts. This is not what the CSD Agreement was meant to be.

They have refused to disclose their water usage, in this time of record-breaking drought.

They have not been forthright about the causes of all the fires in the past year.

They have never owned up to the Hydrogen Sulfide with which they periodically pollute their neighbors' air. As you know, H<sub>2</sub>S causes frontal lobe brain damage. Even AQMD employees say they never own up to what they do.

Extreme methods of oil extraction are resulting in accidents all over the country. Unlike those places, this is not a rural area. The health of thousands will be shown to be affected over time. Your department has been woefully inadequate in protecting our community's health and safety.

Thank you for including my comments in the Periodic Review.

J.E. Brockman

## John M. Kuechle

10733 Ranch Road  
Culver City, CA 90230

(310) 838-8940  
jmk@post.harvard.edu

April 6, 2014

Los Angeles County  
Department of Regional Planning  
Attn: Timothy Stapleton, Zoning Enforcement West  
320 W. Temple Street  
Los Angeles, CA 90012

Re: Baldwin Hills CSD Periodic Review

Dear Tim:

This letter will set forth some comments to the February 2014 Public Draft relating to the Periodic Review of the Baldwin Hills Community Standards District.

On February 23 I sent an email to John Peirson which included a few comments about the Public Draft. The reason I sent this out so quickly (only a few days after the release of the Public Draft) was that I hoped the lack of analysis in certain sections of the document would be remedied during the comment period so that members of the community could learn the rationale behind the County's decision to leave certain sections of the CSD unchanged. This would provide community members with the necessary background to make intelligent decisions as to whether the County's positions made sense or whether changes to the ordinance were necessary. As I said in my previous email, it is not helpful for the Public Draft to simply assert that current amounts "are adequate," without providing any explanation as to the basis for this conclusion. It is unfortunate that my comments have apparently been sitting in the County Counsel's office for the past month and a half, and that any changes the County might choose to make to those sections will now come to late to inform members of the public (including the undersigned) wishing to weigh in on these issues.

I have quoted the substantive body of my earlier email in a postscript to this letter, and hereby incorporate those comments herein.

The remainder of this letter will address a few different points.

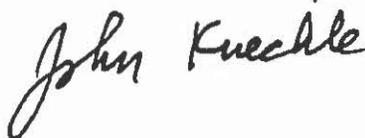
The final recommendation in the Public Draft (relating to CSD Section J.2.a) is a good one, although I would ask that the last few words be changed to "are addressed at the Community Meeting." A principal purpose of the Community Meeting is to facilitate

communication and discussion between the operator and its neighbors. Responding to a question by saying the operator will send out an answer next week may ultimately provide an appropriate response, but it makes it very difficult for the community to participate in the discussion.

Continuing with the same line of thought, the stated purpose of the CAP is to “foster communication” about the oil field. Here again, there can be no meaningful communication and discussion if every time a technical issue comes up, the only representative of the operator responds that she does not know anything about it. Even in those cases where an answer is ultimately provided (usually a month or two later), the operator’s unwillingness to provide someone who can answer a significant portion of the questions at the CAP meeting makes it virtually impossible to have meaningful communication. I would therefore request that a similar recommendation be made for the monthly CAP meetings, so that the operator is directed to take steps to ensure that questions from the public (or at least a significant percentage of them) are answered at the CAP meeting in which they are asked.

Section J.1.c of the CSD specifically requires the operator to provide copies of numerous reports, documents and other items to members of the CAP who request them. (I believe there are other sections requiring that these also be available to the public at large.) For most of these items, the operator does not deliver physical copies to CAP members, but relies on the fact that the items have been posted on the operator’s web site. However, all of the posted documents make it impossible to write electronic notes on the document, and they all have watermarks embedded which frequently make the documents difficult to read, either in their electronic version or after they have been printed. It seems clear that this approach is not consistent with the operator’s obligations under the CSD. However, I would request that the County specifically require the operator to make clean copies of the required items available on their web site..

Sincerely yours,



John M. Kuechle

cc: Ms. Meghan Sahli-Wells  
Carol Schwab, Esq.  
Mr. David McNeil  
Ms. Lark Galloway-Gilliam  
Kenneth Kutcher, Esq,  
Robert Garcia, Esq  
Damon Nagami, Esq.

P.S. There follows some of the substantive language from my February 23 email:

“I was greatly troubled by your analysis of Sections G4 and G5 of the CSD (insurance and security). As you know, I have long thought that the County is being far too generous to Freeport in this area, but I was prepared to re-examine my thoughts in light of any analysis contained in the Review. Unfortunately, there is no real analysis in the Review. So far as I can see, the Review does not even mention the amount of insurance coverage or security that is currently required, much less discuss why these are appropriate figures. It simply states the conclusions that "no additional coverage amounts are necessary," and that the bond amounts "are appropriate."

“With regard to Section G4, I accept your point that the level of risk at the oil field is not necessarily comparable with that of operating an off-shore drilling rig in the Gulf of Mexico - however, no attempt was made in the Review to calculate the true level of risk at this oil field, or to compare that with the level of insurance currently being provided.

“I find the lack of analysis for Section G5 even more troubling. Here, the bond is to be tied to the operator's obligations relating to "well abandonment, site restoration and environmental cleanup." However, the Review does not make any reference to the anticipated cost of fulfilling such obligations, much less compare those costs with the amount of the bond. Simply saying that the current bond amount is "appropriate" is obviously not an analysis.

“I would request that these two sections be significantly revised to specifically compare the current bonding and insurance figures with the best available prediction of the clean-up cost and the risk of accidental contamination.”

## Timothy Stapleton

---

**From:** CCSC [800ccsc@gmail.com]  
**Sent:** Thursday, April 03, 2014 6:26 PM  
**To:** Timothy Stapleton  
**Subject:** Re: Baldwin Hills Community Standards District First Quarter 2014 Complaint Log

Hello Timothy

A few more suggestions.

1.). The noise monitoring needs to record peak levels and not be averaged out. It's like if you heard a gun shot it eventually didn't happen.

2.) Maintenance and workover rigs should be required to have the same noise requirements as new drilling rigs

3.) More ground cover needs to be planted to replace the growth removed for the roadways to help minimize the increase of dust into the community. This will also help in the visual blight.

Thanks  
Gary Gless

## Timothy Stapleton

---

**From:** CCSC [800ccsc@gmail.com]  
**Sent:** Thursday, April 03, 2014 5:56 PM  
**To:** Timothy Stapleton  
**Subject:** Re: Baldwin Hills Community Standards District First Quarter 2014 Complaint Log

Hello Timothy,

As you requested at the CAP here is my revised suggestion to the annual ground movement requirement to have it done twice a year and the trigger point to be .3" since that is half of the annual of .6. This will help in the analysis of what DOGGR is looking at an help in the prevention of property damage to the surrounding community.

Thanks  
Gary Gless

--  
Gary Gless

On Apr 3, 2014, at 4:21 PM, Timothy Stapleton <[tstapleton@planning.lacounty.gov](mailto:tstapleton@planning.lacounty.gov)> wrote:

Good afternoon all,

Pursuant with section 22.44.142.F.7 of the Baldwin Hills CSD, please find attached the redacted First Quarter (2014) Complaint Log. This will also be uploaded to the Baldwin Hills CSD website.

Timothy Stapleton  
Zoning Enforcement West  
Department of Regional Planning  
320 W. Temple Street  
Los Angeles, CA 90012  
<http://planning.lacounty.gov>  
213-974-6453

<image001.gif>

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<First Quarter 2014 Complaint Log.pdf>

## Timothy Stapleton

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**From:** Kevin Finkel  
**Sent:** Thursday, March 06, 2014 8:14 AM  
**To:** Timothy Stapleton  
**Subject:** Baldwin Hills CSD Periodic Review

Hey Tim,

As a follow up to our conversation this morning. As I read through the Periodic Review, I am noticing that some of the recommendations related to changes to the CSD are phrased as "no changes are recommended" and some are phrased as "no changes are recommended at this time." Is this just an inconsistency in wording or is there some anticipation that the provisions that contain "at this time" might wind up with recommendations for CSD modification in the future depending on comments and feedback received?

Kevin Finkel, AICP  
Regional Planning Assistant II  
Community Studies West Section  
Department of Regional Planning  
320 W. Temple Street  
Los Angeles CA 90012  
213-974-6422  
<http://planning.lacounty.gov>



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Freeport-McMoRan Oil & Gas  
5640 South Fairfax Avenue  
Los Angeles, CA 90056

Telephone: 323-298-2200

February 28, 2014

Department of Regional Planning  
Attn: Timothy Stapleton, Zoning Enforcement West  
320 W. Temple Street,  
Los Angeles, CA 90012

**VIA ELECTRONIC MAIL and FEDERAL EXPRESS**

**RE: Baldwin Hills Community Standards District Periodic Review Public Draft dated February 2014**

Dear Mr. Stapleton:

As Operator of the Inglewood Oil Field (IOF), Freeport-McMoRan Oil & Gas (FM O&G) has reviewed the Baldwin Hills Community Standards District (CSD) Periodic Review Public Draft dated February 2014 (Draft) and is pleased to submit our comments, including those attached. We are appreciative of the County's thorough analysis and reporting of FM O&G's compliance records of the preceding five-years in the Draft, and are gratified by the results of the review. As these records demonstrate, the provisions of the CSD have effectively ensured that oil field operations at the IOF have been, and are, conducted in a safe manner that is compatible with surrounding uses. FM O&G takes pride in the responsible development of the IOF and has not had one instance of non-compliance with the CSD in the past five years. As such, FM O&G does not find it necessary or appropriate to amend the CSD, nor do we believe the record justifies the County taking such action. We do request, however, that the Draft be updated to correct technical information and clarify jurisdictional authorities, particularly those of the State of California Department of Conservation Division of Oil, Gas and Geothermal Resources (DOGGR).

California imports 65% of the oil it consumes. FM O&G's California business is to search for and produce oil and natural gas which is then used entirely in California. We are a local, real world example of reducing our dependence on imported oil. As much as 50% of the IOF's oil resources remain in place in producing zones and can be readily accessed through drilling and production activities using current technology. These resources will continue to 1) ensure the IOF supplies California with a domestic oil source for decades to come, offsetting the need to import supplies from Venezuela and the Middle East, and 2) strengthen the County's workforce through attraction and retention of highly skilled science and engineering professionals as well as providing many employment opportunities and training for unskilled and semi-skilled workers in Los Angeles County. Currently, the IOF provides approximately 1,160 full-time positions in total (including both FM O&G staff and contractors), and this number is projected to remain constant for the foreseeable future.

FM O&G is committed to compliance with all applicable governmental regulations and the responsible operational procedures to provide community compatibility. Since inception of the CSD, FM O&G has submitted, and received approval of over 60 implementation items and a multitude of quarterly, semi-annual, yearly, etc. compliance reports and studies. Our EH&S on



call personnel are available to respond to public concerns 24/7 via our 800 number, and our Ombudsperson regularly attends the monthly Community Advisory Panel (CAP), annual community meetings and other meetings and events throughout the communities surrounding the IOF. We perform annual training drills in the presence of many agencies including, but not limited to, the State of California Department of Fish and Wildlife Office of Spill Prevention and Response (OSPR) and the Los Angeles and Culver City Fire Departments. All FM O&G employees and contractors working on the IOF are trained annually on all CSD provisions, and area specific training (i.e. quiet mode drilling) are emphasized to employees directly implementing such procedures.

All drilling operations have been, and are, performed in strict compliance with applicable Drilling, Redrilling, Well Abandonment and Well Pad Restoration Plan requirements along with requirements of other agencies, particularly, the DOGGR. As the County is aware, the DOGGR preempts the regulation of all downhole activities, including hydraulic fracturing and certain types of well stimulation activities via a set of comprehensive regulations in the form of SB 4. Accordingly, FM O&G requests that the County disclose this jurisdictional delineation in the Draft and correct any instances of conflict with it as further detailed in the enclosure to this letter.

Please feel free to contact me should you have any questions.

Sincerely,

A handwritten signature in black ink that reads 'L Vlk'.

Laura Vlk  
Senior EH&S Specialist

Cc: Steve Rusch, Vice President EH&S and Government Affairs  
Terry Collier, Assistant General Counsel  
John Martini, Manager EH&S and Government Affairs  
Candace Salway, Manager EH&S

**Freeport-McMoRan Oil & Gas Comments on Periodic Review Public Draft  
April 28, 2014**

Comment #	Page	CSD Section	CSD Provision	Comment
1	14	X	X	In the last paragraph of this discussion on the health risk assessment, comments from the Community Health Council (CHC) are cited; however, no conclusion is provided nor is any summary of the Public Health Study. To accurately and impartially summarize this issue, a description of the study as well as any comments received should be included. As such, please include a summary of the Public Health Study and any responses from the Public Health Department on CHC's comments.
2	15	D.1	Operational Limits	The "summary of issues raised by the public" section includes a discussion of concerns raised regarding bottom hole locations "outside the CSD boundary" and states that the County and the oilfield operator have confirmed that no surface or bottom hole well locations have been drilled outside the DOGGR established boundaries of the CSD/Inglewood Oil Field. The discussion further states that : "All new drill sites are subject to review and approval by the County pursuant to Provision E. 26, the <i>Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan</i> and this provision prevents approval of surface hole locations in those subject areas." Please include additional text clarifying that downhole operations are regulated by the DOGGR.
3	17	E.1	Fire Protection and Response	In the 2nd paragraph, please edit as follows:  "Annual spill containment response training has been completed on <u>February 4, 2009, February 17, 2010, April 10, 2010, October 26, February 17, 2011, and February 1, 2012 and February 12, 2013, LA County and Culver City Fire Departments may attend the training as allowed for under CSD Provision F.4.</u> "  Note the training required under this CSD provisions, E.1, and that of F.4 are completely separate from one another; hence, the request for deletion of the last sentence above as Fire Department attendance is not applicable to the E.1 training.
4	18	E.1	Fire Protection and Response	Please change the first sentence on this page as follows:  "Annual emergency response drills have taken place on November 24, 2009, November 3, 2010, October 26, 2011, <del>February 1,</del> <u>November 7, 2012,</u> and November 6, 2013."
5	23	E.2	Air Quality and Public Health	Add the following sentence to the end of the second paragraph under "summary of complaints:"  <u>"The SCAQMD exempts such emissions of fugitive dust when wind gusts exceed 25mph (Rule 403.g.2)."</u>

Freeport-McMoRan Oil & Gas Comments on Periodic Review Public Draft  
April 28, 2014

Comment #	Page	CSD Section	CSD Provision	Comment
6	24	E.2	Air Quality and Public Health	Under "Summary of Issues Raised," the last sentence of third paragraph does not reflect accurate conditions. To remedy, change as follows:  "As a result of the NOV, The operation of the bio-remediation farms at the oil field has been temporarily halted while the Operator installs the modifications and upgrades as required by the NOV <u>the new RWQCB permit issued February 7, 2013.</u> "
7	26	E.2	Air Quality and Public Health	First sentence, second Paragraph, change as follows to accurately cite CSD language:  "All tanks that contain oil <del>and/or produced water</del> or could contain oil...":
8	27	E.2	Air Quality and Public Health	Add the following sentence to the end of the second paragraph:  <u>"The SCAQMD exempts such emissions of fugitive dust when wind gusts exceed 25mph (Rule 403.g.2)."</u>
9	36	E.4	Geotechnical	Change the second paragraph as follows:  "The surveys are completed using Global Positioning (GPS), Geodetic Leveling <u>and</u> DifSAR processes and procedures as documented in the ground movement monitoring plan as approved by <del>DRP</del> DPW and DOGGR."
10	40	E.5	Noise Attenuation	The fourth paragraph, second sentence should read:  "The agreement revised the CSD with regards to allowable nighttime maximum noise levels <del>and</del> <u>at the baseline monitoring locations.</u> "
11	40	E.5	Noise Attenuation	The first sentence of the fifth paragraph should be struck as the additional monitoring locations were established before the Settlement Agreement.
12	41	E.5	Noise Attenuation	The second paragraph first sentence should be deleted as it is incorrect.  The paragraph should read "In 2010 there were 6 revised baseline monitoring locations that were developed by a team..."
13	60	G.8	MACC	The Operator should be added to the MACC. The operator needs to be present to provide technical input in the event questions are raised about specific operations..

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Comment #	Page	CSD Section	CSD Provision	Comment
14	61	J.1.b	CAP Meetings	CAP meetings should be changed from monthly to quarterly via implementation measures of the CSD. We do not believe a formal amendment to the CSD is necessary to accomplish this scheduling change. The purpose of the CAP is to foster communication about ongoing operations at the oilfield and to allow the community representatives to provide input to the County and the operator. In the first two years of CSD implementation, monthly meetings were beneficial due to the frequent submittal and review of over 60 CSD implementation plans and documents during that time. All of those CSD implementation actions have been completed, and oilfield activities for the subsequent three years consisted of ongoing operations, all of which that were conducted in compliance with the CSD and associated plan approvals, including the annual drilling plan for each year. The highest frequency of compliance submittals occurs quarterly; therefore, the frequency of CAP meetings should be made consistent to match the intent of this provision. Scheduling the meetings on a quarterly basis as opposed to monthly may also have the added benefit of encouraging more attendance at the meetings as well.
15	62	J.1.b	CAP Meetings	Meeting minutes from CAP meetings should not be transcribed word for word - they should be treated as action minutes, similar to how minutes for any public meeting are typically prepared.
16	68	E.19	Groundwater Monitoring	Under "Analysis of Compliance and Effectiveness" change the date of "February 17, 2013" to "February 7, 2013" in the second to last sentence.
17	79	E.26	Drilling, Redrilling and Reworking Operations	Change the 1st paragraph under "hydraulic fracturing" as follows:  "...to be completed by an independent third party consultant <u>chosen by PXP and a peer reviewer chosen by the County and PXP.</u> "
18	80	E.26	Drilling, Redrilling and Reworking Operations	Add the following sentence to the end of the f paragraph under "Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan:"  <u>"It should be noted that downhole activities, including well bore paths, are regulated by the DOGGR."</u>
19	80	E.26	Drilling, Redrilling and Reworking Operations	Delete the 1st paragraph on this page. Hydraulic fracturing is a downhole, <i>completion</i> technique. Well completions are not required to, nor are they, discussed in the <i>Drilling, Re-Drilling, Well Abandonment and Well Pad Restoration Plan.</i>  Or, if this paragraph is left in, language should be added that clarifies that DOGGR has exclusive regulatory jurisdiction over downhole operations and completion techniques are not part of the

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<b>Comment #</b>	<b>Page</b>	<b>CSD Section</b>	<b>CSD Provision</b>	<b>Comment</b>
				CSD Annual Drilling Plan. Furthermore, the Annual Review should also note that since the adoption of the CSD, the State of California has adopted comprehensive regulations in the form of SB 4 that govern hydraulic fracturing and certain types of well stimulation operations.
20	80	E.26	Drilling, Redrilling and Reworking Operations	The first paragraph under "Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan," includes a discussion of concerns raised regarding bottom hole locations "outside the CSD boundary. Please include additional text clarifying that downhole operations are exclusively regulated by the DOGGR.

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Comment #	Page	CSD Section	CSD Provision	Comment
21	80	E.26	Drilling, Redrilling and Reworking Operations	<p>Under "Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan," change the third paragraph as follows:</p> <p>In support of maximizing the drilling activity in the middle of the field several comments requested that the Operator be required to abandon more wells and well pads along the edges of the oil field. However, it must be noted that this is not a requirement of the CSD, <u>nor is it technically or economically feasible.</u></p> <p><u>There are known limitations on how far the surface locations of the well can be placed from the bottom hole location to produce the Vickers Rindge zone which comprises the vast majority of production at the field. Most Vickers Rindge wells are limited to having the surface location, on average, 200' from the bottom hole location. This number varies 100' or so in each direction based upon the depth of the Alpha (top) of the Vickers Rindge zone.</u></p> <p><u>Because of the geologic nature of the Inglewood Oil Field, it would take multiple horizontal wells to offset a single vertical well. Vertical wells are optimal at the Inglewood Field because there are multiple layers within each zone. Up to 26 layers are produced from within the Vickers Rindge zone for instance. A single vertical well can tap all those layers. A horizontal well in contrast would be limited to accessing one or two layers within the Vickers Rindge zone.</u></p> <p><u>The Inglewood Oil Field is a water flood. Water flood operations do not effectively operate using horizontal wells for injection operations. The injection wells require vertical spacing throughout the field to effectively "sweep" the hydrocarbon reserves in place. Since industry has not developed cost-effective technology to control an injection profile in a horizontal well, vertical injection wells would still be needed throughout the field.</u></p> <p><u>The modified production and injection facilities would be less effective in producing the reservoirs in place. The reduced production rates would trigger additional public policy issues relative to displacement of the mineral rights interests, compensation for such displacement, etc. The added costs of these issues would exacerbate the total estimated costs of the project.</u></p> <p><u>Forced consolidation of the type contemplated is economically infeasible. It is highly unlikely the true capital costs of such a project could ever be recovered.</u></p>

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Comment #	Page	CSD Section	CSD Provision	Comment
22	80	E.26	Drilling, Redrilling and Reworking Operations	The 2nd paragraph under "annual drilling, redrilling, etc. plan" includes a discussion of "well bore paths." Please include additional text clarifying that downhole operations are exclusively regulated by the DOGGR.
24	108	F.4	Annual Emergency Response Drills of the County and Culver City Fire Departments	<p>Change the second paragraph under "analysis of compliance and effectiveness" as follows:</p> <p><del>"The provision is considered to be fully effective at this time and no further analysis is recommended. However, it is recommended that efforts are made to ensure that unannounced drills take place at the oil field as required by the provision of the CSD. The Department of Regional Planning will coordinate with the Fire Department to ensure that unannounced drills occur in the future."</del></p> <p>The CSD does not <i>require</i> unannounced drills. The CSD states (emphasis added):</p> <p>"the operator shall demonstrate effectiveness of the emergency response plan by responding to not more than two unannounced drills each year which <u>may</u> be called by the county fire department at the oil field." (emphasis added)</p> <p>Therefore, <b>IF</b> the LACFD calls an unannounced drill, the operator shall demonstrate effectiveness. There is no requirement for the LACFD to call unannounced drills and there is no evidence suggesting that such drills are necessary. All of the agencies involved have repeatedly given high marks for FM O&amp;G's performance during drill exercises. OSPR has even commented that we rank among the top in the State.</p>
25	109	F.4	Annual Emergency Response Drills of the County and Culver City Fire Departments	<p>Change "recommendations" as follows (for the same reasons as the comment above): -</p> <p><del>"This provision is implemented as intended, no changes to implementation are recommended. However, as stated above, it is important to ensure that unannounced drills are conducted periodically the oil field."</del></p>
26	110	F.5	Noise Monitoring	The statement in "recommendations to changes in implementations" states that the provision has not been implemented to date. This is not the case. The Public Health Department has attended CAP meetings to discuss their findings of oil field noise monitoring. CAP minutes of October 25, 2012 are attached for reference.

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Comment #	Page	CSD Section	CSD Provision	Comment
27	134	J.3	Ombudsperson	<p>Under "Analysis of Compliance and Effectiveness" change as follows to reflect actual conditions:</p> <p><del>"Although sSSome concerns have been expressed by members of the CAP on timeliness on information received about operations of the oil field, this is considered an ongoing compliance issue that can be resolved under the existing provisions. Measures have been taken .The Ombudsperson consistently to ensures</del> that the items that remain pending from previous CAP meetings are addressed at the next meeting <del>by the Ombudsperson</del> or individually with the members of the public making the inquiry. <u>The Operator has consistently submitted all required reports and documentation to the County in compliance with required timelines and has posted all information to the <a href="http://www.inglewoodoilfield.com">www.inglewoodoilfield.com</a> website and provided notice to the CAP of the information/posting in compliance with the CSD.</u> The County will remain vigilant to ensure that the Operator continues to provide information to the public through the Ombudsperson as appropriate. This condition is considered to be fully effective at this time and no further evaluation is recommended."</p>
28	Apdx B	N/A	N/A	Update this appendix in accordance with the comments above.
29	Apdx A 1	N/A	N/A	<p>Add the following text to the responses to FerazziP-1 and -2 :</p> <p><u>The DOGGR occupies the field of regulation related to downhole activities. Since the adoption of the CSD, the State has adopted comprehensive legislation and regulations pursuant to SB 4 that regulate hydraulic fracturing and certain types of well stimulation operations.</u></p>
30	Apdx A 2	N/A	N/A	In the response to FerazziP-13, change "City Fire Department" to "County Fire Department."
31	Apdx A 3; 11	N/A	N/A	<p>The responses to FerazziP-15 and CAP-28 states the following:</p> <p>"Due to security reasons and Federal Homeland Security requirements, the ERP cannot be provided as a public document. The ERP can be viewed at the County by appointment."</p> <p>The second sentence of this response is in direct conflict to the first sentence. The ERP is not a public document, and therefore, may <i>not</i> be viewed by the public at the County. As such, the second sentence must be deleted.</p>

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Comment #	Page	CSD Section	CSD Provision	Comment
32	Apdx A 3	N/A	N/A	Change the response to SanfordD-1 as follows:  <u>"Private, vested, surface property rights, leases for oil and gas exploration, drilling, production, processing and associated activities and safety concerns, prevent public access through the oil field.</u>
33	Apdx A 4	N/A	N/A	Change the responses to SherD-1 and SherD2 as follows:  A bicycle path on La Cienega is outside the scope of the CSD and <u>vested, surface property rights, leases for oil and gas exploration, drilling, production, processing and associated activities and safety concerns prevent public access through the oilfield.</u>
34	Apdx A 4-5; 10; 12	N/A	N/A	Change the responses to 1) SkelleyL-1, 2) Survey-8/MorganC-8, 3) Survey-18/LowL1, 4) Survey-66/Reitz T-1, 5) CAP-14/FerrazziP-2; 6) CAP-21/GlessG-4; 7) CAP-26/FerrazziP-4; 8) CAP-27; 9) CAP-53; 9) CHC-8 as follows:  <u>"Hydraulic fracturing well enhancements are not currently in use or permitted at the oil field. It should be noted that downhole activities, including hydraulic fracturing, are regulated by the DOGGR. Since the adoption of the CSD, the State has adopted comprehensive legislation and regulations pursuant to SB 4 that regulate hydraulic fracturing and certain types of well stimulation operations."</u>
35	Apdx A 8-9	N/A	N/A	Change the response to 1) Survey-60/GourleyS-6, 2) Survey-61/GourleyS-7, 3) Survey-69/BladesV-2; and 4) Survey-72/BladesV-5 as follows:  No response necessary. Comment noted. <u>The 800 number is posted on the www.inglewoodoilfield.com website, prominently displayed in the annual newsletter, distributed twice per year to the CAP and MACC, and provided to anybody requesting it in compliance with CSD requirements. The 800 numbers is also prominently posted at every gate along the perimeter of the Inglewood Oil Field. Therefore, the posting of the 800 number, and the availability of it to the public, is adequate. For your future reference, the number is: (800) 766-4108.</u>

Baldwin Hills Community Standards District (CSD)  
Community Advisory Panel (CAP)  
Minutes: 10/25/12  
FINAL

A. CALL TO ORDER – 7:00PM

B. AGENDA – Approved

C. EVENOR MASIS & CARRIE TAYOUR, L.A. COUNTY – DEPT. OF PUBLIC HEALTH  
PRESENTATION: NOISE MONITORING ACTIVITIES AT THE INGLEWOOD OIL FIELD

Evenor Masis described in detail his background, his role within the Dept. of Public Health (DPH), and his more than 18 years of experience in public health and environmental science. With his assistance, DPH and Regional Planning developed the Baldwin Hills CSD noise provisions during the drilling moratorium (2008-2009). He outlined DPH general functions under Title 22 of the California Code of Regulations for CSD provisions, and illustrated the protocol followed for investigating reported complaints each month.

The Quiet Mode Drilling Plan (QMDP) provides certain limitations on oil operational activities on the field during the night-time periods. The methodology that Public Health utilizes for noise monitoring includes random sampling and analysis of the on-site instrument recordings at various points within the surrounding communities around the oil field. The monitors capture every single noise on the field continuously with readings on five-second (5s) intervals, and that more than 30,000 data points are generated within any 12-month period. Noise data is observed monthly by DPH field inspectors on randomly chosen dates, at additional sites surrounding the field, coincidental to the noise monitors deployed by PXP. The machine readers employed by the DPH field inspectors responds to measurements of +/- 3 dBA, and also registers changes by only 1 dBA.

Given the quantity and quality of noise data within this array, Evenor Masis reports that the noise levels observed during the QMDP and overnight periods have consistently been below the 45 dBA Leq nighttime noise limit, on average. He stated that the prevailing noise source for the field is traffic: PXP's contribution to the noise of the area is miniscule in comparison to the constant traffic on the surrounding roadways and background ambience. He maintains that monitoring for 1 dBA is not practical because that small energy change can't be characterized to a specific noise source. Only three (3) times per year have any incidents been reported, even during drilling activities. He also indicated that his resources within the Environmental Hygiene Program are rather limited, with only two staff personnel for these monitoring efforts, and have additional priorities other than measuring redundancies within the current Noise Monitoring Plan, which is working as intended.

D. QUESTIONS AND COMMENTS BY CAP MEMBERS AND THE PUBLIC

Paul Ferrazzi questioned the QMDP/overnight noise levels being reported as equal to 45 dBA Leq on average, when the data in the presentation slide described the levels as less than or equal to 45 dBA Leq on average. John Kuechle clarified that the data indicated that 65 dBA Leq measurements at the interior of the field were reduced to up to 45 dBA Leq at the exterior end of the noise source, and as isolated from the background noise included in the analytical sample. Evenor Masis stated that the various monitoring sites were chosen closest to targets using GPS, and within L.A. County. Gary Gless stated that sound travels upward toward the surrounding communities, and believed the goal of the noise monitoring was to capture environmental noise from the field. He questioned the monitor placement locations, stating they should be positioned closer to the residential properties. Evenor Masis responded that it is important to capture all data impacts from the field, including ambient traffic, and that noises dissipate from noise sources as it travels off the field into the community. Some of the monitoring locations were chosen with ease of use in mind.

A member of the general public inquired if the ambient background noises were statistically random different traffic noises or included singular disruptions such as police or ambulance sirens, for example. Evenor Masis replied that noise distribution comparisons are not-related, like apples to oranges. The noise is recorded direct from non-specific noise sources. Evenor Masis stated that the noises from the field include metal-on-metal contacts from drilling operations. In response to question from the general public regarding any reported noises from fracturing operations, Evenor Masis stated that the overall change in noise from the field overall is only 2-3 dBA, as measured on a logarithmic scale, and is barely perceptible to the hearing of an average observer. Compare the 2-3

dBA of such an operation to the background and community noise which nearly approaches the 65 dBA significance threshold.

Jon Melvin inquired why no sound-walls are used on the field to mitigate the impact of the traffic noises. Evenor Masis stated that the waves of traffic noise completely drown out any noises that PXP may contribute; that sensitivity analyses and scientific techniques demonstrate that. All data points for traffic are in 3-second intervals. George Mallory questioned if the recordings distinguish intermittent traffic noise in comparison to the constant noises produced by PXP. Evenor Masis clarified that the traffic is constant throughout the night, except after the 10 – 11 PM time period at which a drop in the ambient traffic is noticeable. Also during nighttime hours, there are 2-5 minute intervals for aircraft noises near LAX airport at the half hour and hour peaks.

Carrie Tayour presented data previously provided from the Community Survey findings illustrating that respondents are more concerned for other common noise sources in the Baldwin Hills community than noise generated by oil operations at the Inglewood oil field, and by a wide margin. Paul Ferrazzi questioned if thirty (30) total complaints to date were truly representative of the approximately 150,000 community residents surrounding the oil field. Evenor Masis responded that while there were 30 complaints: 28 were unsubstantiated, 1 was an unjustified complaint of humming noise and vibration not attributable to the oil field, and 1 from 2011 was a justified noise complaint, however the noise levels measured during that incident were well below the level of significance.

Jon Melvin reported that clanking can be heard from the oil field during periods of peak noise. Evenor Masis stated there are inherent limitations associated with the County Noise Ordinance; however, to increase the protection factor to the surrounding communities, different health standards are also applied in the analytical process and the assessment is not limited to the PXP noise standard. John Kuechle observed that the noise complaints for 2012 are less than the number reported in the previous years, and trending downward. Evenor Masis clarified that data did not include any of the complaints recorded in the 2012 Complaint Log for the 3<sup>rd</sup> Quarter. However, the number of complaints appears to be decreasing.

Paul Ferrazzi questioned if the noise monitors located near both on-site flares (the new installation, and the back-up), as well as the gas plant would continue to be monitored by DPH against future need for such noise source data. Luis Perez clarified that noise monitors for point sources are positioned closer to the drill rig, not near the field boundaries.

George Mallory requested further information detailing oil field investigations conducted by DPH field inspectors. Evenor Masis stated that the inspectors for the environmental hygiene program investigate non-specific complaints that PXP received, and forwarded to DPH. Inspectors are not emergency responders to specific individual complaints. Evenor Masis provided direct contact information for the Toxics-Epidemiology Program (telephone and email).

#### E. REGIONAL PLANNING UPDATE

DRP is in communication with Sonoma Technology, Inc. (STI) regarding their instrument deployment schedule for the next two months. Luis Perez reported that the accumulated soil that was a subject of questions at the last CAP meeting was found to be bioremediated soil being used for beneficial uses within the field. He also stated that an AQMD investigation was ongoing, but that a Notice of Violation/Notice to Comply was issued to PXP on October 19<sup>th</sup> related to the bioremediation sites. Drilling is set to resume in mid to late November.

#### F. OPERATOR UPDATE

Lisa Paillet reported that four re-work rigs were on-site. She stated that the 2012 Annual Community meeting had occurred on October 15<sup>th</sup>, with good turnout of community representatives, and bodes well for continued outreach in the future. PXP will be posting the FAQs/Q&A on their website soon. PXP re-submitted the Landscaping Plans for Phase 3 through 5, to depict fewer trees planned in some areas along the public right of way as requested by DPW. The 3<sup>rd</sup> Quarter 2012 Groundwater report has been posted on the Inglewood oil field website.

Six (6) total complaints were recorded on the 2012 Complaint Log for the 3<sup>rd</sup> Quarter: Noise (3), Odor (1), Property damage (1), and multiple/various (1). Lisa Paillet informed that there was an on-going investigation of the bio-farms being pursued by AQMD, and that a Notice of Violation had been issued.

In response to questions asked of the ombudsperson at the previous CAP meeting, Lisa Paillet stated that no new wells are proposed for re-abandonment at this time; that wells re-abandoned in 2012 were in accordance with new DOGGR requirements; no Area of Review (AoR) is currently being pursued at this time; and that either clean or recycled rainwater is used for fugitive dust mitigation on the field. She also stated that PXP has purchased water from both Cal American and Golden State in the past, and will inquire with PXP staff whether Golden State is supplying water to the oil field currently. She reported that no drilling is taking place at this time on the field, as evidenced by less truck and personnel activity, but purchased water is not only used for drilling activities. Paul Ferrazzi stated that likely scenarios for increased water usage would include operation of drilling, re-drilling, and re-working rigs.

#### G. CAP/OPEN DISCUSSION

A member of the general public inquired when some sections of the DRP website would be completed, to include background information and FAQs. Rena Kambara described some of the information that is being added to the website, and agreed that the website needs to be updated. She stated that the Documents tab of the DRP website had been updated to include the response letter from the EPA.

Paul Ferrazzi inquired when both DRP/DPW will finalize their collaborative efforts regarding the ground movement surveys, and the process to substantiate residential property damage claims. Rena Kambara responded that DPW had provided a letter to PXP regarding their continuing efforts to provide additional data.

In response to a question from the general public regarding the Hydraulic Fracturing Study: Luis Perez stated that no further action by L.A. County is warranted with regard to the Hydraulic Fracturing Study, as prescribed in the 2011 Settlement Agreement. All questions or comments previously submitted may have been addressed within the report, but no individual responses were sent to the individuals that proposed their inclusion to the study. The general public member also inquired if there were any implications on fracturing (fracking) since the Hydraulic Fracturing Study was released, and whether any applications for fracking permits would be required for wells proposed in the 2013 Annual Drilling Plan. Luis Perez stated that the Annual Drilling Plan does not preclude the use of fracking, and that currently, there is no regulatory action or permit issued for fracking activities by the County. He also stated that fracking is not within the purview of DRP or L.A. County, but with DOGGR which is in the process of drafting such regulations subsequent to their workshop tours. There is no notification process by which PXP must inform DRP or other agencies (except DOGGR) that fracking will be conducted at all. Lisa Paillet asserted that the operator has no current plan to perform fracking on any of their wells at this time.

Paul Ferrazzi inquired why no data from the Horn River study was included in the Hydraulic Fracturing study. Mr. Ferrazzi shared a copy of the study with DRP.

A member of the general public questioned the impartiality of the peer reviewer to the Hydraulic Fracturing Study performed by Cardno/Entrix. He also inquired if there were any recourse, actionable process, or critique that could be pursued since the perceived conflict of the peer reviewer invalidated the findings of the study, by having prior involvement with the oil and gas industry. Luis Perez stated that it is difficult to find peer reviewers that are not involved with the oil and gas industries in some fashion: most have worked within the industries to acquire their expertise. Luis Perez suggested that the general public could submit letters to DRP. In response, John Kuechle called for a motion of the CAP to send a letter requesting that the County explain the selection process for the peer reviewer. The motion was seconded and was passed.

Settlement Agreement compliance letters were sent by DRP to the Petitioners in July 2012, and responses have been received. Carol Schwab, for Culver City, stated that the City believes that two additional wells may need to be considered for supplements due to their locations. Lisa Paillet agreed to investigate the matter, and will provide a response at the next CAP.

H. APPROVAL OF MINUTES: (9/27/12) – Approved  
(7/26/12) – Approved with changes

I. ANNOUNCEMENTS  
- - Next CAP Meeting will be December 6<sup>th</sup>, at 7:00PM

J. ADJOURN – 9:00 PM

ATTENDANCE: 10/25/12  
 (\*absent)

### DESIGNATED SEATS PER 22.44.142.J.1.a

#### *Governmental Entities*

1	Department of Regional Planning	Rena Kambara
2	City of Culver City	Paul Ferrazzi
3	West Los Angeles College	Nabil Abu-Ghazaleh

#### *Operator (per 22.44.142.C)*

4	Plains Exploration & Production	Lisa Paillet
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### NOMINATED SEATS PER 22.44.142.J.1.a

(Accepted first-come/first-served within each sub-group)

#### *Landowners (per 22.44.142.C)*

5	Vickers Family Trust	Jeff Dritley (Roger Shockley)
6	Cone Fee Family Trust	Liz Gosnell

#### *Neighborhood Organizations (Recognized Homeowners Association)*

7	Ladera Helghts Civic Assoc.	Carmen Spiva
8	Windsor Hills HOA	Gary Gless
9	United HOA (View Park)	Catherine Cottles (Phyllis Hall)
10	Culver Crest Neighborhood Assoc.	John Kuechle
11	Blair Hills HOA	Jon Melvin
12	Raintree Community HOA	Ian Cousineau
13	Baldwin Hills Estates HOA	Ronda Jones*

#### *Neighborhood Organizations (No Recognized Homeowners Association)*

14	Ladera Crest Homeowner	George Mallory
15	Baldwin Vista Homeowner	Irma Munoz*

#### *School Districts*

16	Los Angeles Unified	Glenn Striegler*
17	Culver City Unified	Scott Zeidman*

#### *Neighborhood Organizations (All Others)*

18	Windsor Hills Block Club	Toni Tabor*
19	Community Health Councils	Gwendolyn Flynn (Mark Glassock)
20	Baldwin Hills Conservancy	David McNeill*
21	The City Project	Robert Garcia (Ramya Sivasubramanian)

Evenor Masis, Carrie Tayour (DPH)  
 Luis Perez, Ray Mullins (DRP Consultants)  
 Tim Stapleton (DRP)

BALDWIN HILLS CSD  
COMMUNITY ADVISORY PANEL (CAP) MEETING  
Minutes February 27<sup>th</sup>, 2014  
DRAFT

**A. Call to Order - 7:00 PM**

David McNeil Chair.

**B. Announcement of Agenda**

Approved with revision to agenda order to allow for sufficient time for presentation and discussion on the Periodic Review Report.

**C. Periodic Review Power Point Presentation – Luis Perez**

The 60 day public review periods started on February 24, 2014 and ends on April 28, 2014. Mr. Perez provided a power point presentation overview on the timeline, methodology, format and the findings of the periodic review. The presentation also included photographs of several mitigation measures including noise monitors, air quality monitors, odor misters, and signage.

Mr. McNeil asked about who would author a language change to the CSD if a change were to be proposed; Mr. Perez noted that a revision to the CSD would follow the same process as the original CSD ordinance. Mr. Kuechle pointed out that one outcome of the periodic review process could be that the hearing officer may approve the report as written, the recommendations contained within implemented and the periodic review process would be completed. Mr. Stapleton clarified that the final decision on the period review lies with the Director of LA County Planning.

**Air monitors slide** – Mr. Gless asked about the monitoring system and what parameters are measured (THC and H<sub>2</sub>S). Mr. Dusette pointed out the alarm points on the system match the criteria specified in the CSD language and that the two monitoring trailers follow the drill rig from site to site and are installed in upwind and downwind locations from the drill rig. Ms. Paillet noted that FM O&G has two sets of the monitoring trailers. Mr. Kuechle asked about the data logging and storage, Mr. Perez responded that the data is stored and available and can be used as a tool for investigation of odor complaints. Mr. Perez further noted that the data is available to the SCAQMD and that all of the data is stored. Mr. Ferrazzi asked about the calibration of the system, Mr. Dusette described the “bump test” which is a daily check using zero air and a span gas. Mr. Dusette will follow up with additional detail on the testing and span gas concentrations. Mr. Perez described an additional monitor used by the drilling crew located near the bore hole and mud shaker, the data is available for review by the County ECC.

**Portable flare slide** – Mr. Perez described the flare system and the fact that the CSD requirement for the system is tied to potential for odors from the Nodular Shale zone, the zone responsible for the gas release that initiated the regulations under the CSD.

**Odor suppressant system slide** – Mr. Perez described the odor suppressant system used above the mud shaker table. Mr. Ferrazzi requested the MSDS on the odorant used for the drilling mud odorant system.

**Noise monitor slide** – Photographs of a noise monitor and types of sound walls/blankets were shown and discussed. A member of the public asked about inspection frequency and Mr. Perez described the role MRS plays in field inspections and response to complaints from the public on the oil field operations.

**Periodic Review recommendations** – Mr. Perez noted that most of the recommendations are enforceable with the exiting CSD language and/or a change in the compliance effort of the provision. Mr. Perez summarized the recommendations by CSD provision number:

*E.4.e. – Move location of one of the ground movement survey marker locations due to interference from a tree root.*

*E.10 – Submit plans for and install remaining landscaping.*

*E.15.a – Continue existing use of plastic or metal bins as opposed to in ground sumps.* Mr. McNeil asked about the types of containers and a member of the public asked about the contents. Mr. Perez noted that drilling muds/cuttings and various fluid used in the drilling process are stored in the containers. Mr. Dusette noted that FM O&G has an onsite facility, the “Soli-Bond” Facility that processes the used material for recycled use. Several members of the public asked about how much material is recycled and how much is transported to hazardous material landfills such as Kettleman Hills. Ms. Sahli-Wells asked about whether the onsite recycling facility has testing equipment to determine if the material is contaminated. Ms. Paillet will check on the Soli-Bond facility process, throughput, and testing/laboratory capabilities. Mr. Gless asked about whether landfills test the material they receive, Mr. Perez confirmed that all landfills need to test material before they can accept it.

*E.19 – RWQCB additional monitoring locations,* the RWQCB can require additional locations without a change to the CSD.

*E.20 – Operator should increase oversight of oil field perimeter fencing to prevent unauthorized access.* Ms. Sahli-Wells asked about security cameras and Mr. Perez noted that the main gate access areas have cameras but that each well does not have a separate camera. Drilling operations are staffed 24 hours a day. Ms. Paillet noted that the field has 4 onsite operators 24 hours a day, the fact that operators are notified by various alarm systems of problems, and that FM O&G security personal provide over site on the field. Mr. Kuechle noted that due to the large size of the field, it is possible to travel throughout the field without being seen. Mr. Ferrazzi asked about perimeter fencing inspection because he found an open and unlocked gate near Blair Hills Park. The gate in question is not part of the FM O&G oil field fencing, Mr. McNeill will look into the issue and have the gate/fence situation addressed. Mr. McNeill also asked about a tent adjacent to the oil field and Mr. Dusette noted that FM O&G drilling staff are aware of the tent and that someone is sleeping there.

*E.26.c.x – Removal of unnecessary maps/figures from drilling plan documents.*

*E.28.b - Operator should coordinate drilling/maintenance rigs to avoid overconcentration of rigs in one area.*

**F.3 – SIMQAP audit,** Mr. Perez described the SIMQAP audit process and what type of information and records are reviewed. The audit is an in depth look at operational and safety maintenance and inspection records.

**F.4 – Unannounced emergency drills by the fire department.**

**J.1.a – Update CAP membership.**

**J.2.a – Community meeting content should be specific to oil field operations and questions.**

**Noise monitoring question** – Mr. Gless asked about the noise monitoring equipment and whether it can pick up short term events like a pipe banging. Mr. Perez noted that the way noise is measured and averaged, a very short noise source like a single pipe banging would likely not cause an exceedance of the CSD requirements. Mr. Perez suggested a future CAP meeting include a presentation from noise experts, either from Public Health or a consultant, to explain in detail how noise is measured. Mr. Kuechle asked about checking the data and correlating it with noise complaint events. Ms. Sahli-Wells noted that if the equipment is not measuring the noise problems perhaps it is not working correctly and asked about how often it is calibrated. Mr. Perez will check on the calibration schedule of the noise monitoring equipment. Mr. Kuechle also noted that noise issues are difficult to address and that the noise data should be reviewed along with the noise standards to determine if the noise monitoring

system is working. Ms. Paillet noted that all staff on the oil field are required to take CSD training including training on noise minimization.

**Hazardous wastewater/materials question** – A member of the public noted that at the RWQCB hearing last year it was noted that hazardous chemicals such as radon may be found in the surface water runoff. Hazardous materials are taken to an approved landfill such as Kettleman Hills and contaminants in surface water questions are best answered by the RWQCB. Mr. McNeill recommended that the RWQCB staff revisit the CAP and provide an update.

**Alquist Priolo fault zone** – Ms. Cottles noted the correct reference is Alquist Priolo earthquake fault zone (comment for periodic review)

**Ground movement survey** – Mr. Gless requested that the surveys should be done twice a year (comment for periodic review).

**Periodic review appendix question** – “*Comment noted*” means the comment has been acknowledged but that it does not warrant follow up or analysis.

**Air quality study** – Mr. McNeill asked as to whether the study will be included in the final periodic review document, Mr. Perez noted that initial results do not indicate any significant air quality issues.

**Prop 65 notification** – Mr. Gless requested that Prop 65 signage be posted at the oil field (comment for periodic review).

#### **D. Regional Planning Update – Tim Stapleton**

**Compliance submittals** – E.30, well and production reporting, uploaded on DRP web site.

**Air Quality Study** – The report is expected in May or April 2014.

**MACC** - Mr. Stapleton announced the MACC meeting took place on Tuesday, January 28, 2014. SCQAMD and RWQCB did not attend. MACC meeting minutes hardcopies were available and the posted on web site. DOGGR continues to look into ground movement issues.

**4<sup>th</sup> Quarter 2013 Complaint Log** – Discussed last meeting, hard copies provided.

**Cost of fires** – Mr. Stapleton noted that Fire Department does not have the data readily available, Mr. Ferrazzi noted that a public records request would get the data quicker.

**March CAP Meeting** – Michael Montgomery from Public Works will attend to discuss the results of the ground movement survey. Several CAP members and members of the public requested that someone with more expertise on the subject discuss the issue with the CAP. It was noted that DOGGR may provide additional input on the ground movement issue but that DOGGR staff have requested more data. Mr. Perez noted that the various studies to date have not indicated oil field operations have caused significant ground movement problems with one exception which is currently under review.

#### **E. Operator Update – Ms. Lisa Paillet**

**2014 Drillings Plan** – Four wells drilled so far in 2014, two re-working rigs are currently on site.

**January 31, 2014 small fire** - Caused by electrical equipment malfunction, DOGGR notified, fire extinguished by FM O&G staff within minutes.

**January CAP question follow up**– Ms. Cottles asked about drilling through fault zones and causing earthquakes. Ms. Paillet noted that there is no evidence of this occurring to date, the accelerometer and fracking study both indicated no earthquakes have been caused by drilling activities. Ms. Cottles asked about fires and electrical equipment and Mr. McNeill asked about permits for electrical equipment upgrades. Ms. Cottles also asked about the cement used in wells and Mr. Paillet noted that the CSD requirement increased the cement plug length in wells to 150 feet, the DOGGR requirement is 25 feet. Notification issues during earthquakes was also discussed. Ms. Paillet noted that document watermarks are used at the lowest setting of gray, however, several commenters noted the watermarks are still too dark. Mr. Kuechle noted the issue should be included in the periodic review (**periodic review comment**). Methanol use was followed up and Ms. Paillet provided that a <1% solution is used for well stimulation.

**F. Approval of Minutes** – deferred to next meeting due to time constraints.

**G. Announcement** – Next CAP meeting March 27, 2014.

**H. Adjourn** – 9:00.

ATTENDANCE: 1/23/14

(\*absent)

**DESIGNATED SEATS PER 22.44.142.J.1.a*****Governmental Entities***

1	Department of Planning	Timothy Stapleton
2	City of Culver City	Meghan Sahli-Wells
3	West Los Angeles College	Nabil Abu-Ghazaleh*

***Operator (per 22.44.142.C)***

5	Freeport McMoran Oil & Gas	Lisa Paillet
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**NOMINATED SEATS PER 22.44.142.J.1.a****(Accepted first-come/first-served within each sub-group)*****Landowners (per 22.44.142.C)***

6	Vickers Family Trust	Roger Shockley*
7	Cone Fee Family Trust	Nancy Snowden for Liz Gosnell*

***Neighborhood Organizations (Recognized Homeowners Association)***

8	Ladera Heights Civic Assoc.	Carmen Spiva*
9	Windsor Hills HOA	Gary Gless
10	United HOA (View Park)	Catherine Cottles
11	Culver Crest Neighborhood Assoc.	John Kuechle
12	Blair Hills HOA	Jon Melvin*
13	Raintree Community HOA	Bambi Ngamfa
14	Baldwin Hills Estates HOA	Ronda Jones*

***Neighborhood Organizations (No Recognized Homeowners Association)***

15	Ladera Crest Homeowner	Rene Talbott
16	Baldwin Vista Homeowner	Irma Munoz*

***School Districts***

17	Los Angeles Unified	Glenn Striegler*
18	Culver City Unified	Katherine Paspalis

***Neighborhood Organizations (All Others)***

19	Windsor Hills Block Club	Toni McDonald-Tabor*
20	Community Health Councils	Erin Steva
21	Baldwin Hills Conservancy	David McNeill
22	The City Project	Ramya Sivasubramanian*

## Timothy Stapleton

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**From:** Luis Perez [luis.perez@mrsenv.com]  
**Sent:** Sunday, February 23, 2014 10:32 AM  
**To:** Dean Dusette  
**Subject:** Fwd: Draft Periodic Review

Sent from my iPhone

Begin forwarded message:

**From:** John Kuechle <jmk@post.harvard.edu>  
**Date:** February 23, 2014 at 10:26:56 AM PST  
**To:** John Peirson <john.peirson@mrsenv.com>  
**Cc:** Luis Perez <luis.perez@mrsenv.com>  
**Subject:** Draft Periodic Review

John and Luis,

I looked at the draft Periodic Review - what an amazing amount of work you guys did!

Luis and I spoke briefly several months ago about the fact that if the Review were to recommend changes to the ordinance, that might open the door for Freeport to encourage the Supervisors to make other changes, the net result of which could be a reduction in protection. I was therefore not as surprised as I suspect others may be by the fact that no changes are being proposed to the CSD. However, I think it would be helpful for you to talk at the upcoming meeting about the areas where you have concluded that practices permitted by the current CSD are not optimal (e.g., underground sumps, groundwater monitoring wells, over-concentration of reworking rigs, fence repairs), and to explain why it is preferable to simply "recommend" that Freeport address these issues, rather than imposing a requirement. It might also be worthwhile to talk about whether something stronger than a "recommendation" could be imposed in one or more of these areas without the need to amend the CSD ordinance.

I was greatly troubled by your analysis of Sections G4 and G5 of the CSD (insurance and security). As you know, I have long thought that the County is being far too generous to Freeport in this area, but I was prepared to re-examine my thoughts in light of any analysis contained in the Review. Unfortunately, there is no real analysis in the Review. So far as I can see, the Review does not even mention the amount of insurance coverage or security that is currently required, much less discuss why these are appropriate figures. It simply states the conclusions that "no additional coverage amounts are necessary," and that the bond amounts "are appropriate."

With regard to Section G4, I accept your point that the level of risk at the oil field is not necessarily comparable with that of operating an off-shore drilling rig in the Gulf of Mexico - however, no attempt was made in the Review to calculate the true level of risk at this oil field, or to compare that with the level of insurance currently being provided.

I find the lack of analysis for Section G5 even more troubling. Here, the bond is to be tied to the operator's obligations relating to "well abandonment, site restoration and environmental cleanup." However, the Review does not make any reference to the anticipated cost of fulfilling such obligations, much less compare those costs with the amount of the bond. Simply saying that the current bond amount is "appropriate" is obviously not an analysis.

I would request that these two sections be significantly revised to specifically compare the current bonding and insurance figures with the best available prediction of the clean-up cost and the risk of accidental contamination.

John Kuechle