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 Sebastion 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