PXP
Inglewood Oil Field

EFFECTIVENESS REVIEW OF BALDWIN HILLS CSD PROVISIONS – 2014 –

AMP = Air Monitoring Plan
CAN = Community Alert System
CSD = Community Standards District
DP = Drilling Plan
ECP = Erosion Control Plan
EQAP = Environmental Quality Assurance Program
FDCP = Fugitive Dust Control Plan
FDSP = Fugitive Dust Sign Plan
FPA = Fire Protection Audit
GMP = Groundwater Monitoring Program
MSO = Meteorological Station Operation
OMP = Odor Minimization Plan
QMDP = Quiet Mode Drilling Plan
TLDC = Tank Leak Detection and Containment
TSA = Tank Seismic Assessment

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
D.	Area Specific Development Standards	Operational Limits	
D.1	Operational Limits	No oil field activities have occurred in the areas limited by the provision.	No Change
E.	Oil Field Development Standards		
E.1.a	Develop a CAN system (reverse dialing system) within 120 days following effective date and test annually.	The CAN system plan was approved by the LA County Fire Department on 2/18/10 to be installed by 9/17/10. PXP (FM O&G) implemented a vendor (CodeRED) supplied reverse dialing system on 9/16/10. The CAN system was successfully tested on 12/10/10, 11/22/11, and 12/19/12. Annual CAN testing conducted by the operator, FM O&G, included only first responders and affiliated agencies such as Culver City, and did not include the entire notification list. No residents or local businesses were included in the annual tests. The operator has confirmed that additional contacts can be added to the annual test list. It is recommended that FM O&G conduct annual testing which includes residents - CAP members and other interested residents at the very least - and that FM O&G prepare a message for the testing similar to the message utilized for the Emergency Broadcast System. The message would clearly state a test is being conducted, and that in the event of an actual emergency the listener would be directed what to do and where to obtain more detailed information.	Modification to Implementation
E.1.b	Conduct annual spill containment response training.	The Spill Prevention, Control, and Countermeasure (SPCC) Plan was updated in 2011. Annual spill containment response training occurred on February 17 and April 10, 2010, October 26, 2011, and February 1, 2012.	No Change
E.1.c	Operator to maintain, implement and comply with an emergency response plan.	The ERP was approved with updates for biological resources on 3/31/10. Annual emergency response drills have taken place on November 24, 2009, October 26, 2011, and February 1, 2012.	No Change
E.2.a	Operator to obtain emission offsets, or reclaim credits for applicable new emission sources.	To date, the oil field has obtained five SCQAMD permits; one for the new flare and four for the installation of new tanks. None of these permits required emission offsets or the purchase of RECLAIM credits.	No Change
E.2.b	No new gas plant or flare to be installed at steam drive plant. Operator to connect steam drive plant to existing gas plant.	Provision has not been implemented to date because a new gas plant or new steam drive plant has not been proposed or installed.	No Change

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E.2.c	Operator to comply with odor minimization plan.	The Odor Minimization Plan was approved on 2/25/09 and revised in April 15 2010 with training occurring annually. Odor suppressants are in use at drilling sites and bioremediation farms.	No Change
E.2d	Operator to comply with air monitoring plan.	The Air Monitoring Plan was approved on 2/29/09 with current revision dated 1/4/10. Training on plan occurs annually. The air monitoring systems have been installed and the air monitoring criteria have not been exceeded to date. Therefore, neither the drilling nor the gas plant corrective actions required by this subsection have been necessary to implement.	No Change
E.2.e	Ensure mud-gas separator vessel (i.e., gas buster) and portable flare are installed and ready for use, if needed.	All drilling sites utilize a gas buster and portable flare system. The system was approved and permitted by the SCQAMD. The system has not been required to be activated to date.	No Change
E.2.f	Within 180 days following effective date, ensure tanks have a fully operational pressure monitoring system.	System has been installed based on SCQAMD inspection results and review of breakdown reports. System is subject to SCQAMD fugitive emission rules.	No Change
E.2.g	Use odor suppressant(s) for bioremediation farms.	Use of odor suppressants at bioremediation farms verified by field inspections. Odorant applied as needed manually with sprinkler type system. Bioremediation farms currently not operating due to SCQAMD violation for odors.	No Change
E.2.h	Spray muds and cuttings passing through mud shakers with odor suppressant.	The installation of the odor suppressant system at drilling sites has been documented during field visit inspections. Odorant is supplied by overhead sprinkler mister system above the mud shakers.	No Change
E.2.i	Contain produced water and oil within closed systems at all times, except for sampling.	System has been installed based on SCQAMD inspection results and review of breakdown reports. System is subject to SCQAMD fugitive emission rules.	No Change
E.2.j	Operator to maintain and operate a meteorological station at oil field.	The application for the installation of the meteorological monitoring system was approved by the SCAQMD on 7/21/09, the system was installed and tested in December 2009 and was operational on January 21, 2010. Data is collected and stored on a data collection system and reviewed monthly. Sensors are calibrated annually by vendor technicians.	No Change
E.2.k	Updated health risk assessment.	The requirement is to update facility health risk assessment with 5 years of site specific meteorological data should the data indicate the potential for significant change in the results. The data collection	No Change

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		period has not reached the required 5 years. Thus, this provision has not been implemented to date.	
E.2.l	Utilize Tier III or better diesel engines plus 3 CARB verified diesel catalysts during drill pad construction.	Off road construction equipment emission control certifications are on file with the County.	No Change
E.2.m	Utilize CARB/EPA Certification Tier or better certified engines, or other methods approved by CARB as meeting or exceeding the Tier II standard.	Drill rig engine emission control certifications are on file with the County.	No Change
E.2.n	Meet drilling and redrilling setbacks of 400 feet from developed areas and 20 feet from roadways.	All drill site locations are reviewed prior to approval of annual drilling plan approval.	No Change
E.2.o	Ensure no overlap in major facility construction and installation activities, such as steam drive plant, water processing facility, or oil cleaning plant.	Condition has not been required to be implemented to date because no major facility construction projects have been proposed or approved.	No Change
E.2.p	Operator to comply with fugitive dust control plan.	The Fugitive Dust Control Plan was approved on March 26, 2009. Site inspections have documented compliance with watering of unpaved roads with two water trucks in operation during normal business hours. Two of the three total dust complaints received to date occurred when wind speeds were documented at over 30 mph and an AQMD wind advisory was issued.	No Change
E.3.a	Ensure natural gas liquids are blended with the oil to the maximum allowable pipeline system vapor pressure.	All (100%) natural gas liquids are blended with the oil.	No Change
E.3.b	Within 90 days following the effective date, Operator to install and maintain fire-proofing insulation on all propane and natural gas liquids bullets.	The propane and natural gas liquids bullet fire proofing was completed on February 23, 2009 and with the associated documentation submitted to the LA County Fire Department on February 25, 2009. Compliance with NFPA Requirements, the County Fire Code, County Fire Department Regulations, California Code of Regulations, and API Requirements was documented in the PXP 2009 Third Party Audit of Fire Protection Capabilities at Inglewood Oil Field report.	No Change

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E.3.c	Ensure steam drive plant meets 1,000-foot setback from developed area.	Condition has not been required to be implemented to date because no steam drive plant project has been proposed or approved.	No Change
E.3.d	Within one year following the effective date, ensure existing and new oil tank areas have secondary containment (berms and/or walls)	The PXP 2009 Tank Leak Detection and Containment at Inglewood Oil Field report, approved in May 2009, documented that all tanks have secondary containment. The PXP Retention Basin Study, completed in March 2009 and revised in September 2009 and January 2010, analyzed and modeled the capacities of the basins along with a 100 year storm event and determined the basins have adequate capacity.	No Change
E.4.a	Ensure grading involving up to 5,000 cubic yards is part of an approved master grading plan.	All grading at the oil field has been reviewed and approved by the County Public Works Department by the annual submittal of a master grading plan, submitted in October or November of each year.	No Change
E.4.b	Ensure a site-specific geotechnical investigation is completed for grading in excess of 5,000 cubic yards.	Site specific geotechnical investigations for grading have not been required because all grading projects at the oil field to date have been 5,000 cubic yards or less. Geotechnical reports have been prepared for permanent structures such as new tank installations; the reports were submitted to County Regional Planning and Building & Safety departments.	No Change
E.4.c	Within 180 days following the effective date, submit an erosion control plan.	The Erosion Control Plan was approved on 5/27/210.	No Change
E.4.d	Ensure slopes are restored to original grade once use discontinued.	Restoration of slopes at the oil field from grading activities has been completed consistent with the erosion control plan and the master grading plan.	No Change
E.4.e	Ensure operator conducts ground movement survey at least once every 12 months and results are forwarded to DOGGR and the public works director.	Ground movement surveys have been completed annually as required pursuant to the Accumulated Ground Movement Plan approved by County Public Works on November 10, 2009. Annual survey reports completed in April 1010 (Baseline Survey), December 2010, April 2011 (revised February 2012), May 2012, August 2013, September 2013, and October 2014 were submitted to DOGGR and the County Public Works Department.	No Change
E.4.f	Ensure no permanent structure is constructed in an Alquist-Priolo Fault Zone with a certified fault study.	No permanent structures have been constructed in an Alquist-Priolo Fault Zone since the adoption of the CSD; therefore, this provision has not been implemented.	No Change

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E.4.g	Ensure operator maintains an accelerometer, records and transmits readings to the Caltech Seismological Laboratory.	The accelerometer seismic station was operational and collecting data on 5/20/09. Data is transmitted by cell link to the CalTech Seismological Laboratory.	No Change
E.4.h	Ensure operator maintains a pipeline management plan.	The pipeline management plan was submitted to DOGGR as required in December 2009, it has not been necessary to update the plan to date.	No Change
E.4.i	Ensure operator has a qualified paleontologist monitoring all rough grading and other ground disturbing activities.	Three projects have triggered the paleontological requirements of this subsection. The surveys were performed by an environmental consulting firm with a County approved Registered Geologist with expertise in paleontology. Results of the surveys for the three projects did not indicate any items of potential paleontological interest.	No Change
E.5.a	Ensure A-weighted equivalent noise levels do not elevate above existing baseline levels by more than five dBA.	No measured noise levels above the criteria have been attributed to oil field operations to date.	No Change
E.5.b	Turn off audible mobile equipment and truck backup alarms between the hours of 8:00 p.m. and 8:00 a.m.	Results of annual EQAP audits and interviews with drilling staff indicate back up alarms are turned off during QMDP activities.	No Change
E.5.c	Quiet Mode Drilling Plan	The QMDP was submitted in February 2009 and revised in April, July and September 2009. Noise minimization measures in the plan are checked during drilling site inspections. Drill rig operations staff reviews the QMDP prior to each shift during “tailgate” safety meetings.	No Change
E.5.d	Ensure noise-producing equipment is regularly serviced, repaired and logged.	Maintenance log for noise producing equipment is reviewed during annual EQAP audits. The 2012 audit recommended improved documentation for these records.	No change
E.5.e	No deliveries (equipment, trucks, vacuum trucks, tools or materials) between 8:00 p.m. and 7:00 a.m. and on Sundays or legal holidays 8:00 p.m. and 9:00 a.m., except in cases of an emergency.	Requirement is checked during annual EQAP audits and signage on the delivery restrictions is posted at main facility access gates.	No change

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E.5.f	No deliveries to the drill site within 500' of a residential property between 5:00 p.m. and 7:00 a.m. and on Sundays or legal holidays 5:00 p.m. and 9:00 a.m., except in cases of an emergency.	Requirement is checked during annual EQAP audits and signage on the delivery restrictions is posted at main facility access gates. Vendors and oil field staff involved with unloading are reminded of noise minimization measures to avoid unnecessary noise such as banging of pipes.	No change
E.5.g	Ensure no permanent structures are constructed between 7:00 p.m. and 7:00 a.m. or during Saturdays, Sundays, or legal holidays.	The oil field operator complies with the time limits for construction of permanent structures, no construction occurs after 7:00 p.m. and before 7:00 a.m., or during Saturdays, Sundays, or legal holidays.	No change
E.5.h	Construction equipment selected for low noise output.	Equipment is serviced and is properly muffled pursuant to the manufacturer's specifications.	No change
E.5.i	Prohibit idling of construction equipment with internal combustion engines.	Construction equipment operators are trained on noise minimization measures are discussed at "tail gate" briefings and the unnecessary idling of construction equipment is discussed.	No change
E.5.j	Operator to instruct employees and subcontractors about noise provisions and shall annually certify to such to the director.	Noise minimization measures are discussed at "tail gate" briefings prior to the start of projects and all employees and sub-contractors are trained to comply with the noise provisions each year during annual certification training. Training records are checked during the annual EQAP audit process.	No Change
E.6	Ensure operational vibrations are minimized and do not exceed a velocity of 0.25 mm/s over the frequency range 1 to 100 Hz.	The results of the vibration monitoring completed for the EIR prepared for the development of the CSD showed no operational vibrations above the specified criteria. However, the monitoring results suggested the installation of a new flare to minimize potential vibration issues, the installation of the new flare was completed in 2013. The County has not deemed additional monitoring for vibration necessary.	No Change
E.7.a	Operator to comply with ERP for oil spill response to protect biological resources.	The ERP was approved with updates for biological resources on 3/31/10. Annual emergency response drills have taken place on November 24, 2009, October 26, 2011, and February 1, 2012.	No Change
E.7.b	Ensure operator complies with the special status species and habitat protection plan.	The Special Status Species and Habitat Protection Plan was approved on 11/15/10. Compliance with the plan is documented in Special Status Species Compliance Reports with reports prepared for the years 2011and 2012.	No Change

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E.7.c	Ensure operator complies with the habitat restoration and revegetation plan.	Disturbance to sensitive habitat areas has not reached the one acre total trigger for implementation of the restoration plan requirements to date. Therefore, this provision has not been implemented.	No Change
E.7.d	Ensure operator has the following surveys conducted by an approved professional: sensitive plant survey, sensitive wildlife survey, breeding and nesting bird survey, and wetland delineation survey.	Pre-construction surveys have been completed for applicable projects and are documented in the annual Special Status Species Compliance Reports.	No Change
E.7.e	Ensure operator complies with applicable federal and state regulations if listed plant or wildlife species are found, and for any tree and riparian scrub removal.	Review of 2012 Special Status Species Compliance Report documents compliance.	No Change
E.7.f	Ensure operator complies with the habitat restoration and revegetation plan.	Disturbance to sensitive habitat areas has not reached the one acre total trigger for implementation of the restoration plan requirements to date. Therefore, this provision has not been implemented.	No Change
E.7.g	Tree and riparian scrub removal.	Vegetation removal activities are documented in the annual Special Status Species Compliance Reports.	No Change
E.7.h	Habitat restoration.	Disturbance to sensitive habitat areas has not reached the one acre total trigger for implementation of the restoration plan requirements to date. Therefore, this provision has not been implemented.	No Change
E.8.a	Operator to ensure that oil operations do not impact the Cone Trust House.	The Cone Trust House and surrounding area are off limits to oil field staff to prevent any impacts to the historic building. A discussion of the significance of the Cone Trust House is included in the cultural resources sensitivity training of the oil field archaeological training program.	No Change
E.8.b	Operator to provide archaeological training to construction personal involved in ground disturbance activities.	The archeological training program was initially conducted on May 26, 2009 and is a component of the annual training program for oil well facility staff and sub-contractors.	No Change

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E.8.c	Ensure operator complies with the construction treatment plan.	The Construction Treatment Plan was submitted in May 2009, revised in July 2010, and approved on 1/24/11. To date one incident has required the implementation of the Inadvertent Cultural Resource Discovery procedure contained in the plan. On November 9, 2010 during the preparation of the well pad two headstones were unearthed which were later determined to not be of cultural significance.	No Change
E.9.a	Ensure outdoor lighting is restricted to only those lights that are required by code for the lighting of building exteriors, drilling, and redrilling rigs and for safety and security needs and screened downward to prevent offsite lighting spill over.	The lighting fixtures at the oil field are screened to orient the light downward toward the area requiring illumination as feasible. Other lighting, such as security lighting at the office building, uses hood type screening fixtures to focus the light downward. Lighting at drill sites is the minimum lighting necessary for safe operations.	No Change
E.9.b	Ensure a lighting plan has been approved for each new permanent structure.	No new permanent structures requiring a lighting plan have been proposed by FM O&G, therefore, this provision has not been activated to date.	No change
E.10	Ensure operator complies with the approved conceptual landscaping plan.	The Landscaping Plan Inglewood Oil Field was first submitted in May 2009 and was revised in November 2010 and outlines seven phases of landscaping effort. Landscaping for Phase 1 and 2 has been completed for areas at the Ladera Crest residential view shed looking north and along the Windsor Hills/La Brea traffic corridor view shed, respectively. Phase 3 outlines plans for the Ladera Crest residential view shed looking east, Phase 4 and 5 involve a roadway buffer along La Cienaga Boulevard. The plans for Phases 3, 4, and 5 have been approved by the County with work for Phase 5 scheduled to start in January 2014. Phase 6, a landscape buffer for the Fairfax Avenue roadway and Phase 7, a landscaping buffer for Stocker Street have been prepared in draft form and are posted on the oil field web site. Landscaping progress at Phases 1 and 2 has been periodically reviewed by the County ECC during site inspections. *It is recommended that FM O&G schedule installation of remaining landscaping phases to achieve the landscaping required by this provision in a timely manner.*	Modification to Implementation
E.11.a	Oil Field Waste Removal Waste Collection	Waste generated by drilling, redrilling, and reworking activities is collected in bins, in the ground sumps are not used at the oil field.	No Change

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E.11.b	Oil Field Waste Removal Waste Discharge	Oil field waste is collected in bins and is not discharged to the ground. The PXP Retention Basin Study documented that the retention basins on site have sufficient capacity to handle a worst case spill event and a 100 year storm event.	No Change
E.11.c	Oil Field Waste Removal Recycling Plan	The PXP Recycling Plan Inglewood Oil Field was approved on October 3, 2011	No Change
E.12	Construction of Private Roads	No private roads have been constructed to date and all oil field activities utilize existing access roads, therefore, this requirement has not been activated to date.	No Change
E.13.a	Signs Perimeter Identification Signs	Signs have been installed as required and the maintenance of the signs is documented by site inspections and annual EQAP audits.	No Change
E.13.b	Signs Main Entrance Sign	Signs have been installed as required and the maintenance of the signs is documented by site inspections and annual EQAP audits.	No Change
E.13.c	Other Required Signs	Signs have been installed as required and the maintenance of the signs is documented by site inspections and annual EQAP audits.	No Change
E.13.d	Well Identification Signs	Signs have been installed as required and the maintenance of the signs is documented by site inspections and annual EQAP audits.	No Change
E.13.e	No Littering Signs	Signs have been installed as required and the maintenance of the signs is documented by site inspections and annual EQAP audits.	No Change
E.14	Painting	The painting of the Inglewood Oil Field structures and equipment was completed on November 12, 2012. The paint color, licorice, was chosen with assistance of a landscape architect and was approved by the LA County Board of Supervisors. The maintenance of the painting and coatings of the equipment and structures at the oil field is a continuous process and FM O&G employs a full time painter to maintain the coatings on the structures and equipment at the oil field.	No Change
E.15.a	Sumps Sump Clean Out	All historical sumps that existed on site were cleaned out, filled in with clean soil, and re-graded to match the surrounding topography in 2007. In the ground sumps are no longer in use at the facility. *It is recommended that the Operator continue the use of metal and or plastic bins and tanks consistent with current practice as the elimination of the use of below ground sumps is considered to be a significant environmental benefit.*	Modification to Implementation
E.15.b	Sumps Sump Fencing	Sumps are no longer in use at the oil field; therefore, sump fencing is not required.	No Change

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E.16	Well Cellars - construction	Well cellar construction is inspected by DOGGR for compliance with applicable regulations.	No Change
E.16.a	Well Cellars Cellar fluids	Well cellars are kept free of fluids and are checked daily by oil field staff. Vacuum trucks are available on site to remove fluids if necessary.	No Change
E.16.b	Well Cellars Multi cellar access	The oil field does not contain any multi well cellars; all well cellars are of the single well cellar type; therefore, this subsection does not currently apply to any existing oil field structures.	No Change
E.16.c	Well Cellars Singe Cellar covers	All well cellars in the oil field are covered with an open grating and surrounded with fencing to prevent vehicle access. The well fencing includes signage depicting the name of the well per the requirements listed Provision E.13.d.	No Change
E.16.d	Well Cellars Cellar Ladder Openings	None of the wells require cellar ladder openings due to the shallow depth of the cellars; therefore this subsection does not currently apply to any existing oil field structures.	No Change
E.17.a	Construction Storm Water Pollution Prevention Plan	The SWPPP is updated as needed and submitted to the RWQCB and the County Public Works Department for review and approval. Recent updates to the SWPPP have been submitted annually along with the Master Grading Plan, the current SWPPP is dated August 2013.	No Change
E.17. b	SPCCP	The SPCCP plan is updated every five years and implemented as a training exercise annually; the most recent spill containment response training was completed on February 1, 2013	No Change
E.17.c	Hydrologic Analysis	The hydrologic analysis requirement has not been implemented to date because no oil field projects have triggered the requirement.	No Change
E.18	Water Management Plan	Plan completed May 2009, revised in December 2010, revised in June 2011. The plan includes water conservation measures for office, landscaping, operations, and maintenance water uses. The plan also includes a section on employee awareness to encourage water conservation.	No Change

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E.19	Groundwater Monitoring	Groundwater Monitoring Program and Work Plan approved August 2009. Five monitoring wells installed down gradient of each surface water basin, installed between January and March 2010 and quarterly groundwater Monitoring Reports began in 2010. *Based on comments by the RWQCB regarding potential additional monitoring locations, it is recommended that the Operator coordinate with the RWQCB and install additional groundwater monitoring wells if deemed necessary.*	Modification to Implementation
E.20	Fencing	The chain link fencing at the Inglewood Oil Field meets the DOGGR requirements of the provision. *Due to un-authorized access through damaged fencing it is recommended the ECC and the Operator increase monitoring of the condition of the perimeter fencing.*	Modification to Implementation
E.21.a	Oil Field Cleanup and Maintenance Equipment Removal	The Unused or Abandoned Equipment Removal Plan Inglewood Oil Field describes the equipment removal activities completed since the adoption of the CSD. Sixty four pieces of equipment were removed in 2008 and 2009. The Plan was recently updated in December 2012.	No Change
E.21.b	Oil Field Cleanup and Maintenance Equipment Maintenance	All oil field equipment maintenance is tracked and scheduled with a vendor supplied computer based maintenance management program. The operator also conducts daily equipment checks and annual internal safety audits.	No Change
E.21.c	Oil Field Cleanup and Maintenance Site Debris and Vegetation	Outside storage of equipment at the oil field is consistent with this requirement and typical for an oil and gas operation.	No Change
E.22	Security	Gates at the oil field are consistent with these regulations and all unmanned entrances are equipped with the required sliding type gates. Current security at the oil field includes a 24 hour guard at the main entrance gate to the field off of Stocker Street and a guard at the entrance to the field and offices off of Fairfax Street.	No Change
E.23	Vehicle Parking	The oil field contains sufficient parking for all employee, subcontractor, visitor, and heavy equipment vehicles. Marked parking spaces at the office building and warehouse areas are consistent with County code requirements. No vehicles associated with oil field operations park off site, therefore, parking of vehicles for oil field operations does not impact any public parking facility.	No Change
E.24.a	Sanitation Garbage and Refuse	Garbage and refuse are picked and removed weekly by a subcontractor garbage collection company. Garbage bins are located at the office, the warehouse, and other locations throughout the oil field.	No Change

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E.24.b	Sanitation Toilets and Wash Facilities	Permanent toilet and wash facilities are located at the office building, the warehouse, the gas plant, the "halfway house" across from the gas plant, and at two modular buildings used by sub-contractors. The restroom facilities are maintained by a sub contractor janitorial service. Portable facilities are located throughout the field and moved as needed, the portable restrooms are maintained by the subcontractor providing the units.	No Change
E.25	Storage of Hazardous Materials	The hazardous materials business plan for the oil field is submitted to the Fire Department for review and approval on an annual basis as required. The hazardous materials storage area is periodically inspected by the Fire Department.	No Change
E.26. a	Drilling, Redrilling, & Reworking DOGGR Regulations	All drilling operations at the oil field are inspected by DOGGR to ensure compliance with these state regulations. The County permit for drilling requires DOGGR permit.	No Change
E.26. b	Drilling, Redrilling, & Reworking Number of drilling & redrilling rigs	In compliance, currently one rig in use at the field and the maximum number of rigs since the adoption of the CSD has been two.	No Change
E.26.c	Drilling, Redrilling, & Reworking Annual drilling plan	Plans have been submitted annually per the requirements with the plans reviewed and approved by the County prior to the subject drilling year. The 2014 plan was approved in October 2013. *In consideration of a the usefulness and substantial costs associated with the preparation of the topographic vertical profiles, it is recommended considering removing the subject figures/maps from the Annual Drilling Plan until the information is deemed useful for inclusion in future plans.*	Modification to Implementation
E.26.d thru j	Drilling, Redrilling, & Reworking Rig and Fire Safety Requirements	Documented for compliance via County and DOGGR permits, DOGGR inspections and the annual drilling plan review and approval process.	No Change
E.27.a	Processing Operations Limits on Processing Operations	Processing occurring at the oil field is associated with the dehydration of oil and gas, the storage, handling, recycling, and transportation of those materials, water injection operations. The oil field does not need to process hydrogen sulfide or other impurities prior to transportation to offsite refineries.	No Change
E.27.b	Processing Operations Refining	No refining is done at the oil field.	No Change
E.27.c	Processing Operations Well Pump Motors	All well pump motors at the oil field are powered electrically.	No Change

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E.27.d	Processing Operations Submersible Well Pump	Approximately 50 wells at the oil field have been retrofitted with this new technology.	No Change
E.27.e	Processing Operations Removal by pipeline	All oil, gas, and other hydrocarbons produced in the oil field are shipped and transported via pipelines and all natural gas liquids are blended into the oil and thus transported by pipeline.	No Change
E.27.f	Processing Operations Pipelines	No new pipelines that transport oil or gas from the oil field have been constructed since the adoption of the CSD.	No Change
E.27.g	Processing Operations Active Pipeline Plot Plan	The active pipeline plot plan was submitted to the Fire Department on December 9, 2009.	No Change
E.27.h	Processing Operations Machinery Enclosures	The equipment at the oil field complies with the referenced County code requirements under Section 11 for health and safety requirements for hazards.	No Change
E.27.i	Processing Operations Opening Protections	The equipment at the oil field complies with the referenced County code requirements under Section 11 for health and safety requirements for hazards.	No Change
E.28.a	Well Reworking Operations DOGGR Regulations	Wells associated with reworking operations require a permit from DOGGR and thus must meet the applicable well reworking requirements.	No Change
E.28.b	Well Reworking Operations Number of Reworking Rigs	Compliance with the number of reworking rigs at the oil field is documented by weekly email updates to the County listing the number of reworking rigs and the well location of the work, this data is confirmed by periodic site inspections. *It is recommended that the Operator facilitate better coordination when scheduling reworking and the other types of rigs at the oil field to avoid concentrating too many rigs in one area.*	Modification to Implementation
E.28.c	Well Reworking Operations Hours of Operation	Standard policy for the operation of reworking rigs operation is daylight hours only, operation during non-daylight hours only occurs when necessary to complete a critical task or for an emergency situation and the work is completed prior to 7:00 pm.	No Change
E.28.d	Well Reworking Operations Specifications	Rigs must have a valid Department of Motor Vehicles license and meet the specifications of the American Petroleum Institute (API) to operate in California.	No Change

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E.28.e	Well Reworking Operations Equipment Removal	Reworking rigs are removed from the field to be used elsewhere by the sub contractor owner unless scheduled for use at another well in the oil field.	No Change
E.29.a	Tanks New Tank Specifications	Four new tanks have been constructed since the adoption of the CSD. Construction of the new tanks required County building and land use permits and a South Coast Air Quality Management permit for the vapor recovery system.	No Change
E.29.b	Tanks Set Backs	Three of four tanks constructed were built per the setback requirements. One tank located at the LAI Last Chance tank battery, was built within the setback criteria, however, the tank replaced an existing tank in the same location and therefore the construction was consistent with the requirement.	No Change
E.29.c	Vapor Recovery	The permitting of these tanks included the tank piping, valves, fittings, and connections. Thus, the tanks were built pursuant the agency requirements for new tank specifications. Vapor recovery systems are inspected by the SCQAMD.	No Change
E.29.d	Tanks Specifications for New Tank Piping, Valves, Fittings, and Connections	The permitting of these tanks included the tank piping, valves, fittings, and connections. Thus, the tanks were built pursuant the agency requirements for new tank specifications. Vapor recovery systems are inspected by the SCQAMD.	No Change
E.29.e	Tanks Detection of Tank Bottom Leaks	All tanks at the Inglewood Oil Field have a program to detect tank bottom leaks. The leak detection for all tanks at the oil field consists of either direct view monitoring of the exterior surface and bottom or by the use of tank foundations of either concrete or gravel.	No Change
E.30	Well and Production Reporting	The reports requested by this provision have been submitted annually to the County and Fire Chief as required. Reporting forms are submitted to DOGGR monthly and are compiled for the annual submittal to the County. The County submittal consists of three document packets; Well and Production Report Maps, Well and Production Report Production Forms, and Well and Production Report Injection Forms.	No Change
E.31	Idle Well Testing and Maintenance	Required testing includes the determination of the fluid level of the well and may include other diagnostic tests as required by DOGGR. The testing is documented in an annual report submitted to DOGGR.	No Change

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
E.32	Abandoned Well Testing	Abandoned well area hydrocarbon vapor testing has been completed by a third party consultant since the adoption the CSD. Annual reports completed to date, for the years 2009 through 2012, have been submitted to the County and DOGGR.	No Change
E.33	Well and Well Pad Abandonment	DOGGR has not implemented this provision to require the operator to plug and abandon any wells to date. Wells scheduled for plugging and abandonment are included in the Annual Drilling, Redrilling, Well Abandonment and Well Restoration Plan subject to DOGGR and the County review and approval.	No Change
E.34	County Request for Review of Well Status	The County has not directed DOGGR to plug or abandon any wells pursuant to this provision to date; therefore, the requirement has not been activated to date.	No Change
E.35	Reduced Throughput Triggering Review	The provision is intended to be implemented at or near the end of the oil fields project life and therefore has not been activated to date.	No Change
F.	Monitoring and Compliance		
F.1.a	EQAP Steps for Compliance	The EQAP was approved by the County in February 2009 and was revised on August 25, 2009. The document also discusses the steps for compliance of the compliance team consisting of County staff, the Environmental Compliance Coordinator (ECC), the MACC, the CAP, third party consultants and auditors, the ombudsperson, and the oil field operator staff.	No Change
F.1.b	EQAP EQAP Reports	Annual EQAP reports have been prepared and submitted by the operator as required by this provision with the first report completed on March 1, 2010. Subsequent reports have been completed annually.	No Change
F.1.c	EQAP EQAP Updates	The EQAP was revised August 25, 2009.	No Change
F.2	Environmental Compliance Coordinator (ECC)	An ECC position has been funded by the operator as required by this provision since the adoption of the CSD. The ECC's have met the qualification requirements for the position and have been approved by the County.	No Change
F.2.a	Environmental Compliance Coordinator On site monitoring	The ECC's are familiar with the compliance requirements of the CSD and periodic oil field site inspections have been completed and documented.	No Change

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
F.2 b	Environmental Compliance Coordinator Employee and Contractor Awareness	Training records are reviewed during annual EQAP audits and during periodic site inspections as necessary.	No Change
F.2.c	Environmental Compliance Coordinator Mitigation Adequacy	Site inspections, annual audits, plan and compliance document review by the ECC assist the County in determining adequacy of the provisions of the CSD.	No Change
F.2.d	Environmental Compliance Coordinator Reporting Responsibilities	The ECC coordinates compliance reporting requirements with the MACC, the CAP, third party consultants and auditors, the ombudsperson, other agencies, and the oil field operator staff.	No Change
F.3.	SIMQAP Requirements	Approved SIMQAP contains the required information listed in F.3.a.i through F.3.a.v. *A comprehensive SIMQAP audit has not been conducted to date. It is recommended that a SIMQAP audit be conducted over the next year in coordination with the EQAP audit and that appropriate interested regulatory agencies be noticed of the audit for participation as applicable.*	Modification to Implementation
F.3.b	SIMQAP Updates	The County has not required an update to the SIMQAP to date.	No Change
F.3.c	SIMQAP Worker Notification	Applicable oil field staff receives training on the SIMQAP as a component of the annual CSD training program.	No Change
F.3.d	SIMQAP Inspections	The operator conducts annual internal safety audits of the facility which are tracked and scheduled by computer facility management software.	No Change
F.4	Annual Emergency Response Drills	Emergency response drills were conducted annually on November 24, 2009, November 3, 2010, October 26, 2011, November 7, 2012, and November 6, 2013. *Due to the fact that unannounced drills have not taken place in the past, it is recommended that efforts are made to ensure that unannounced drills take place at the oil field as required by the provision of the CSD. The Department of Regional Planning will coordinate with the Fire Department to ensure that unannounced drills occur in the future.*	Modification to Implementation
F.5	Noise Monitoring	The County has not required that the additional monitoring pursuant to this provision to be necessary to date.	No Change
F.6	Vibration Monitoring	The County has not required that the additional monitoring pursuant to this provision to be necessary to date.	No Change

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
F.7	Complaints	The complaint procedure required by this provision has been implemented and is ongoing	No Change
G.	Administrative Items		
G.1	Costs of Implementing Monitoring and Enforcing Conditions	The operator has made timely payments on all CSD monitoring and enforcement costs to the County through the draw down account required by CSD Provision G.2.	No Change
G.2	Draw Down Account	The draw down account has been maintained at or above the $50,000 balance as required by this requirement since the adoption of the CSD.	No Change
G.3	Indemnification	The required agreement was documented in a letter signed by the operator and the County dated November 12, 2009, the agreement is on file with the County.	No Change
G.4	Insurance Requirements	The operator provided the County with an insurance policy meeting the requirements on January 18, 2010. The insurance was updated on June 25, 2013 to reflect the current operator of the oil field.	No Change
G.5	Performance Bond	The operator provided the County with a performance bond issued by an acceptable corporate surety licensed to transact business in the state of California on September 29, 2009. The insurance was updated on June 25, 2013 to reflect the current operator of the oil field.	No Change
G.6	Other Obligations	The condition is administrative in its intent and is considered to be fully implemented.	No Change
G.7	Periodic Review	This report, prepared subject to this provision, documents compliance with the periodic review requirement. The review provides a comprehensive analysis of the effectiveness of the requirements of each CSD provision.	No Change
G.8	MACC	The MACC held its first meeting on May 13, 2009. Subsequent meetings have been held on March 16, 2009, April 20, 2009, July 16, 2009, September 17, 2009, February 11, 2010, July 8, 2010, November 4, 2010, April 12, 2011, and May 13, 2013.	No Change
G.8.a	MACC Members	The MACC has had representation from the agencies listed in this provision as required.	No Change
G.8.b	MACC Chair	The MACC meeting Chair is selected by the committee as necessary.	No Change
G.8.c	MACC Meetings	The MACC meetings are scheduled by the committee as necessary.	No Change

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
G.8.d	Documents Provided to MACC	Documents required by the MACC are determined by the committee as necessary.	No Change
G.9	Related County Code Provisions	The condition is administrative in its intent and is considered to be fully implemented.	No Change
H.	Permitting		
H.1	Director's Review Required	The new well permits issued by the County have been less than the number allowed by the CSD and as by the CSD as revised by the Settlement Agreement and the Annual Well Increase Evaluation.	No Change
H.2	Conditional Use Permit Required	This provision is an administrative requirement for a land use permit process; the operator has not applied for such a permit to date.	No Change
H.3	CUP Requirements	This provision is an administrative requirement for a land use permit process; the operator has not applied for such a permit to date.	No Change
H.4	Application Where Violation Exists	This provision is administrative in its intent and has not been implemented to date. The condition requires the operator to resolve any land use violations prior to the application of any new permit application at the oil field.	No Change
I.	Enforcement		
I.1	Civil Penalties and Performance Security	No violations or enforcement actions have been taken by the County and there have been no issues regarding access to compliance documentation or for access to the oil field.	No Change
I.2	Access to Records and Facilities		
I.3	Right of Entry		
J.	Public Outreach		
J.1	CAP	Established in 2009 with first meeting held March 26, 2009 and the schedule for subsequent meetings determined during the meetings with meetings occurring approximately monthly.	No Change
J.1.a	CAP Members	CAP membership was determined pursuant to this subsection. *In response to requests by the public to update CAP membership, allow new members to fill vacant seats and replace absentee members, the DRP Director will review CAP membership and determine how to proceed under the existing provision of the CSD.*	Modification to Implementation

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
J.1.b	CAP Meetings	The CAP meetings schedule is determined during the meetings with meetings occurring approximately monthly.	No Change
J.1.c	Documents Provided to the CAP	Documentation is provided to the CAP by web site posting and hard copy distribution at CAP meetings.	No Change
J.2.a	Community Relations Community Meetings	Community meetings have occurred annually since the adoption of the CSD with the first meeting occurring on May 26, 2009. Subsequent meetings have taken place on April 21, 2010, June 8, 2011, October 15, 2012, and November 12, 2013. *Due to the public input on the 2013 Community Meeting, it is recommended that agendas for future Community Meetings be specific to oil field operations and issues and measures be implemented to ensure questions from the public are addressed appropriately.*	Modification to Implementation
J.2.b	Community Relations Newsletter	The newsletters have been prepared annually and are mailed out prior to the community meetings with noticing of the forthcoming meeting date, time, and location.	No Change
J.2.c	Community Relations Oil Field Web Site	The oil field web site, inglewoodoilfield.com, was launched on January 19, 2010.	No Change
J.3	Ombudsperson	The ombudsperson system has been in place since the adoption of the CSD and serves as primary contact between the oil field operator and the community. Current ombudsperson is Lisa Paillet: lisa_paillet@fmi.com, 1-800-766-4108.	No Change
K.	Modification Development Standards		
K.1	Modification Criteria	This subsection lists the requirements and permit processing procedures for a request for a modification to the development standards specified in subsection E of the CSD. No proposal or application for a modification of the development standards of CSD subsection E has been applied for to date.	No Change
K.2	Application		
K.3	Notice		
K.4	Application Approval/Denial Conditions		
K.5	Notification of Decision		
K.6	Appeal Procedures		

CSD #	CSD Provision	Evaluation of Effectiveness Summary	Recommendation
L.	Implementation Procedures		
L.1	Fire Protection and Emergency Response	This provision of the CSD lists the various implementation plans and other stipulations required for initial compliance for the categories identified in subsections L.1 through L.21. The table provided in the provision analysis section of this report provides the applicable plan or requirement for each subsection along with the completed compliance submittal date.	No Change Provision Completed
L.2	Air Quality and Public Health		
L.3	Safety and Risk of Upset		
L.4	Geotechnical		
L.5	Noise Attenuation		
L.6	Biological Resources		
L.7	Cultural/Historic Resources		
L.8	Landscaping, Visual Screening, and Irrigation		
L.9	Oil Field Waste Removal		
L.10	Signs		
L.11	Painting		
L.12	Water Management Plan		
L.13	Ground Water Monitoring		
L.14	Oil Field Cleanup and Maintenance		
L.15	Storage of Hazardous Materials		
L.16	Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan		
L.17	Processing Operations Pipelines		
L.18	Tanks		
L.19	Monitoring and Compliance		
L.20	Administrative Items		
L.21	Public Outreach		