Comment #	Issue Area	Brief Description	Response
Public			
BRJ-1 Brockman	All	Commenter believes DRP is not enforcing the requirements of the CSD.	The requirements of the CSD are enforced by the County, there have been no significant non-compliance issues or accidents at the Inglewood Oil Field since the provisions of the CSD have been implemented. The County Environmental Quality Assurance Program (EQAP) and Environmental Compliance Coordinator (ECC) programs closely monitor compliance with the CSD with field inspections and compliance document review. No violations of the provisions of the CSD have been recorded.
BRJ-2 Brockman	Water Use	FM O&G has refused to disclose the water usage at the oil field.	The CSD does not require such records, however, the Baldwin Hills CSD EIR provided the average water use for 2006-2007 as 160,104 gallons per day. FM O&G reported at the December 2014 CAP meeting water use for 2013 averaged 129,000 gallons per day.
BRJ-3 Brockman	Safety Brush Fires	FM O&G has not provided enough information on the cause of the oil field brush fires.	The brush fire issue has been extensively discussed and reviewed over the past several years including a discussion at the January 23, 2014 Community Advisory Panel (CAP) meeting. At the January 23, 2014 CAP meeting, Mr. Mark Olson of Southern California Edison (SCE) was present to review the two fires that were caused by SCE equipment. SCE and FM O&G presented maintenance plans to help prevent brush fires in the future. FM O&G conducts an ongoing electrical equipment inspection and maintenance program. No brush fires have occurred at the oil field since those that occurred in 2013.

Comment #	Issue Area	Brief Description	Response
BRJ-4 Brockman	Air Quality Odors	Commenter believes FM O&G is releasing hydrogen sulfide into the air.	Comment is not clear as to when the issue with hydrogen sulfide occurred. The oil field has hydrogen sulfide monitors that are employed at drilling, redrilling, and gas plant sites; to date, no exceedance of the air monitoring criteria outlined in the CSD has occurred. In addition, hydrogen sulfide is not present in significant quantities in the oil produced at the oil field.
BRJ-5 Brockman	Safety Extraction Techniques	Commenter believes the DRP allows extreme oil extraction techniques that can cause accidents and danger to the surrounding community.	Two hydraulic fracturing tests were conducted as part of the Settlement Agreement. No additional hydraulic fracturing has occurred at the Inglewood Oil Field. DOGGR recently passed regulations, SB-4, on oil well stimulation techniques such as hydraulic fracturing. FM O&G has not applied for any permits subject to SB-4 to date.
BUD-1 Burns	Administrative	Listed dates of the MACC meetings are incorrect.	Correction acknowledged, the correct dates for the MACC meetings are; March 16, 2009, April 20, 2009, July 16, 2009, September 17, 2009, February 11, 2010, July 8, 2010, November 4, 2010, April 12, 2011, May 13, 2013, and January 28, 2014. The text has been corrected in the discussion of Provision G.8.
BUD-2 Burns	Safety Geology	Question to FM O&G regarding whether any oil field wells were drilled through a fault zone.	The question as to whether FM O&G has drilled any wells through a fault zone was discussed at the March 27, 2014 CAP meeting. As documented in the meeting minutes, FM O&G stated that they will not provide a response to the question. The provisions of the CSD do not require FM O&G to provide the subject information.
CAP-1 Cottles	Administrative	Commenter provided correct reference to the Alquist Priolo earthquake fault zone.	Thank you for the correct reference to the Alquist Priolo earthquake fault zone, the text has been revised accordingly.

Comment #	Issue Area	Brief Description	Response
FEP-1 Ferrazzi	Administrative	Comment requests additional supporting documentation.	The Periodic Review contains supporting documentation in the Analysis of Compliance and Effectiveness section of the discussion for each CSD Provision. In addition, documentation of compliance is based on submitted plans and plan updates, site visits, graphic evidence, reports and studies. Further, the Periodic Review incorporates by reference the compliance documentation available on the County's website.
FEP-2 Ferrazzi	Geology	Bottom hole locations and bottom hole locations located outside the boundary of the CSD.	The Final Periodic Review document includes an updated map providing additional information on well surface locations (Appendix E.) Annual drilling plans include information on bottom hole locations for all wells.
FEP-3 Ferrazzi	Safety	CAN system.	The comment states that no documentation is provided about the area residents contacted during the annual testing of the CAN (Community Alert Notification) system. The annual testing of the CAN system does not involve contacting area residents. The annual testing checks a sub set of the total contacts on the CAN system list. The sub set consists of local agency contacts including County DRP and City and County Fire Departments. Documentation of the testing is provided annually to County DRP.
FEP-4 Ferrazzi	Safety	See FEP-3	Please see response to FEP-3.
FEP-5 Ferrazzi	Air Quality	Gases from oil field operations are impacting neighborhoods.	The fact that the commenter believes gases from the oil field are impacting adjacent neighborhoods is acknowledged. However, numerous studies have shown that the biggest contributor to air quality impacts are the surrounding streets and highways. This was documented in the EIR, the Health Study, and the recently completed STI Air Study.

Comment #	Issue Area	Brief Description	Response
FEP-6 Ferrazzi	Air Quality	Bio Farm remediation soil SCAQMD NOV information inadequate.	The referenced SCAQMD NOV was dated 10/16/2012, numbered P56565, and was associated with SCAQMD Rule 1166. The NOV resulted in the cessation of the Bio Farm soil remediation activity and the NOV has been settled and the case closed. The contaminated soil was removed and disposed of at an SCAQMD approved offsite facility. Although permitted to do so, as of the date of the Periodic Review FM O&G did not have any plans to re-start the Bio Farm operations.
FEP-7 Ferrazzi	Air Quality	SCQAMD Rule 430 Breakdown report data inadequate.	The SCAQMD Breakdown reports detail the repair or corrective action taken which range from replacement of equipment to installation of additional equipment. None of the referenced breakdowns resulted in an enforcement action by the SCAQMD. This item is not a CSD issue, inquiries should be addressed directly with the SCQAMD.
FEP-8 Ferrazzi	Administrative	Request for more supporting documentation.	The Periodic Review process does not require documentation of all referenced data be included in the document itself. However, the wealth of the data is available on the County and FM O&G web sites.
FEP-9 Ferrazzi	Geology	Ground movement surveys are not accurate.	Ground movement reports are prepared by reputable, professionally certified consulting firms. In addition, the survey reports are reviewed by geologists from Public Works and DOGGR. No such deficiencies have been identified.
FEP-10 Ferrazzi	Noise	Settlement Agreement requires more noise monitoring locations.	The comment incorrectly interprets the requirement in the Settlement Agreement regarding noise monitoring. The Settlement Agreement required the determination of revised baseline noise levels based on additional monitoring locations, which was completed. The Settlement Agreement does not require 11 noise monitoring locations as suggested by the commenter.

Comment #	Issue Area	Brief Description	Response
FEP-11 Ferrazzi	Geology Drilling Waste	Mud pits are being used at the oil field.	The referenced CSD provision, E.11 *Oil Field Waste Removal*, correctly documents the fact that oil field waste in not collected or stored in earthen sumps or pits; all such waste is collected in bins. The photographs referenced and attached to the comment show an aerial view of the oil field but do not document the use of sumps or pits for oil field waste.
FEP-12 Ferrazzi	Geology Drilling Waste	Request for additional data on the Soli Bond facility.	Since the date of the draft Periodic Review the referenced facility has changed operators; the new operator is Anterra Services. The drilling mud and tailings from drilling operations are collected in bins and transported from the drilling rig to the Anterra Facility on the Inglewood Site by truck. The Anterra facility uses additional bins and sawdust to dehydrate the drilling waste. The dehydrated drilling waste is then transported to an approved landfill. The discussion of Provision E.11 has been revised to reflect the change.
FEP-13 Ferrazzi	Operations	Drill rigs are too often concentrated in one area.	The issue and potential impact to the adjacent community of the concentration of drilling and re-working drill rigs in one area is acknowledged. The issue has been discussed at CAP meetings as documented in the Draft Periodic Review. The County Environmental Compliance Coordinator (ECC) reviews the location and number of rigs on the oil field during inspections. No over concentration of rigs or complaints of same have occurred since the issue was discussed and addressed at the CAP meetings. In addition, the Draft Periodic Review recommends that FM O&G continue to initiate better coordination in scheduling reworking and other types of rigs to address this issue.

Comment #	Issue Area	Brief Description	Response
FEP-14 Ferrazzi	Environmental Compliance Coordinator	The DRP selection of the Environmental Compliance Coordinator is a conflict of interest.	The County contracted a consultant with expertise in oil and gas to provide independent oversight of the provisions of the CSD via the Environmental Compliance Coordinator (ECC) program. The consultant, MRS, is well known for expertise in atmospheric sciences, land use, system safety, risk of upset, air quality, health risk assessment, noise, aesthetics and fire protection. MRS staff has prepared more than 90 Environmental Impact Reports (EIR) and/or Environmental Impact Statements (EIS) for oil and gas projects and related technical studies during the past 30 years.
FEP-15 Ferrazzi	Environmental Compliance Coordinator	Request for information on the Environmental Compliance Coordinator program.	The Environmental Quality Assurance Program (EQAP) is available on the Inglewood Oil Field website, see page 15 of the EQAP document for information on the ECC.
FEP-16 Ferrazzi	Administrative	Request for information regarding an EPA violation.	The County does not have any record of a violation issued to the oil field operator by the EPA. In response to the County request to provide such documentation, FM O&G has stated that they have not received an NOV from the EPA.
FEP-17 Ferrazzi	Administrative	Draw down account use.	The commenter is incorrect, the draw down account, required under Provision G.2 *Draw Down Account*, was not used to fund the referenced letter by the County to the community regarding hydraulic fracturing.
FEP-18 Ferrazzi	Operations	Question on high rate gravel packing and hydraulic fracturing well completion techniques.	The Periodic Review correctly states that the well completion technique of hydraulic fracturing is not occurring at the Inglewood Oil Field. The comment stating that hydraulic fracturing will occur in the future is conjecture and does not warrant a response.
FEP-19 Ferrazzi	Administrative	Operator political contributions and conflict of interest concerns.	The financial issues noted in the comment are outside the scope of the Periodic Review, no response is necessary.

Comment #	Issue Area	Brief Description	Response
GLG-1 Gless	Geology	Request that the ground movement survey be conducted twice per year.	Request that the annual ground movement survey be performed twice a year and that the trigger point for further analysis be revised to 0.3 inches of ground movement is acknowledged. Note that the ground movement issue is under review by DOGGR. At this point, experts have not determined that increasing the frequency of data collection would contribute in any significant way to the ground movement study analysis.
GLG-2 Gless	Noise	Request for peak level noise monitoring.	Request that the noise monitoring program include peak values is acknowledged, however, the Department of Public Health provided input during the preparation of the Periodic Review and did not recommend any changes to the monitoring program. A noise "spike" such as an instantaneous banging of pipe may not be captured by the hourly averaged noise monitoring program, however, a persistent nuisance type noise would be indicated in the monitoring. In addition, the complaint process under Provision F.7 provides for public input and documentation of noise issues.
GLG-3 Gless	Noise	Request that all rigs at the oil field use same noise mitigation as drill rig.	Request that all drill rig types at the oil field be required to have the same noise requirements as the main drill rig is acknowledged, however, are not required by the CSD.
GLG-4 Gless	Dust	Request for more landscaping/ground cover.	The County agrees with the comment that additional landscaping would help with both dust control and the visual aesthetics of the oil field. The Periodic Review recommends accelerating the schedule for the landscaping program.
GLG-5 Gless	Administration	Request to hold public meetings on weekends.	Request to hold the CAP meeting on the weekends is acknowledged, however, the County notes that County staff are not available on weekends.

Comment #	Issue Area	Brief Description	Response
GLG-6 Gless	Safety	Request for information on the CAN system testing.	The annual testing of the CAN system does not involve contacting area residents. The annual testing checks a sub set of the total contacts on the CAN system list and provides documentation that the system is operating correctly. The sub set consists of local agency contacts including County DRP and City and County Fire Departments. Documentation of the testing is provided annually to County DRP.
GLG-7 Gless	Air Quality	Request that the SCAQMD be notified if any air monitoring device is triggered.	Request for additional notification to the SCAQMD is acknowledged. CSD Provision F.7 allows for notification and documentation of odors detected by the public via the oil field and SCAQMD 1-800 complaint numbers.
GLG-8 Gless	Administration	Request that all oil field monitoring records be maintained for the life of the project.	Request for monitoring data to be kept for the life of the project is acknowledged, however, it is not required by the CSD. Please note that it is the current practice at FM O&G to maintain and keep all monitoring records.
GLG-9 Gless	Air Quality	Request for additional meteorological stations to provide better data input to health risk study.	Request for the need of additional meteorological stations to cover the entire oil field is acknowledged, however, additional stations are not required by the CSD and were not determined to be necessary by the CSD EIR.
GLG-10 Gless	Air Quality	Request for fugitive dust testing.	The Inglewood Oil Field operates with an active dust control plan pursuant to CSD Provision E.2.p; plan requirements include the use of water trucks and other dust control methods. Regarding air quality testing, the Baldwin Hills Air Quality Study provides air toxic monitoring data for the Inglewood Oil Field. The Air Quality Study considered the 37 air toxics emitted from the Oil Field and performed a hazard identification to prioritize the air toxics of greatest concern. The Air Quality Study was completed during early 2015.

Comment #	Issue Area	Brief Description	Response
GLG-11 Gless	Air Quality	Bio Farm remediation soil SCAQMD NOV information inadequate.	A Notice of Violation (NOV) is issued by an SCAQMD Air Quality Inspector to inform a business that it is out of compliance with applicable SCAQMD rule requirements, permit conditions or legal requirements, or with applicable state or federal air pollution regulations. The standard protocol dictates that cases for major sources such as the Inglewood Oil Field are referred to an SCAQMD prosecutor and resolved through an amicable settlement or in the courts in either civil or criminal prosecution. In the case of the comment referenced NOV for the Bio Farm soil, the case was settled amicably and did not involve a civil or criminal case. The contaminated soil was removed and disposed of at an SCAQMD approved offsite facility. Although permitted to do so, as of the date of the Periodic Review FM O&G did not have any plans to re-start the Bio Farm operations. Additional detail on the subject has been added to the Periodic Review.
GLG-12 Gless	Operations	Request to add discussion from CAP meeting to subject Periodic Review section.	The recommendation of additional level controllers for oil field tanks made at the CAP has been added to the subject discussion.
GLG-13 Gless	Administrative	Correction of reference to CAP meeting discussion.	The text referenced in the comment has been revised to indicate the subject recommendation was made by a CAP member.
GLG-14 Gless	Geology	Ground movement study is incomplete and DOGGR requires more data.	The referenced section of the Periodic Review acknowledges that DOGGR has made the determination that additional data is required to obtain a greater understanding of the ground movement at the oil field. DOGGR is currently reviewing the subject and has requested that FM O&G provide more data in an effort to better understand the relationship between ground movement and oil field activities. Additional information will be provided at the conclusion of the DOGGR study.

Comment #	Issue Area	Brief Description	Response
GLG-15 Gless	Geology	Existing ground movement survey monuments should remain if replacement monuments are installed.	The fact that the CAP discussed the ground movement survey marker at Monitor Station 50004 (Historical Monument Inglewood E-1C) and recommended that it remain along with the new survey marker is acknowledged. Michael Montgomery of County Public Works stated at the March 27, 2014 CAP meeting that Public Works would make the same recommendation. The survey marker has been replace and the original location retained for further study.
GLG-16 Gless	Noise	Request that noise peak levels be used for compliance as opposed to hourly average values.	Request for peak level noise monitoring is acknowledged. Noise monitoring was re-evaluated during both the Settlement Agreement and for the Annual Well Increase Evaluation (December 2010). In addition, the Department of Public Health provided input during the preparation of the Periodic Review and did not recommend any changes to the monitoring program. A noise "spike" such as an instantaneous banging of pipe may not be captured by the hourly averaged noise monitoring program, however, a persistent nuisance type noise would be indicated in the monitoring. In addition, the complaint process under Provision F.7 provides for public input and documentation of noise issues.
GLG-17 Gless	Biological Resources	Request for more analysis of oil field impacts to sensitive species and habitats.	Potential impacts to sensitive habitat and seasonal nesting birds is analyzed and monitored with the Special Status Species and Habitat Protection Plan and pre-construction surveys. Compliance with the Special Status Species and Habitat Protection Plan is documented in annual Special Status Species Compliance Reports; these reports are available on the Inglewood Oil Field web site.

Comment #	Issue Area	Brief Description	Response
GLG-18 Gless	Lighting	Periodic Review omitted a complaint/issue with lighting.	The comment may be referring to the discussion at the August 22, 2013 CAP meeting regarding a discussion of light from the oil field impacting a nearby home. The oil field rigs lights/lighting shielding were adjusted based on this input from the public. The Periodic Review has been revised to include this discussion.
GLG-19 Gless	Signage	Request that the oil field post Prop 65 signage.	The oil field does have the referenced and requested Proposition 65 signage, the signs are posted on the oil field fence near the gated entrances.
GLG-20 Gless	Water	Notes that issues regarding storm water basins and potential offsite contaminant runoff were discussed at CAP meetings.	The comment may be referring to the multiple inquiries from members of the general public and the CAP regarding an algae issue with one of the drainage basins. The basin's top layer was covered with blue-green algae which was tested and determined to be a cyanobacteria, which produces oxygen when in bloom and takes oxygen from the water when it decays. Note that any storm water discharge from the oil field drainage basins requires water sampling and chemical analyses pursuant to the oil field RWQCB permit. No exceedance of the RWQCB permit threshold levels have been documented during the 5 year period of the CSD review.
GLG-21 Gless	Safety Hazardous Materials	Hazardous materials are stored at the oil field and potential offsite impacts should be analyzed.	The hazardous waste storage area includes secondary containment to capture any potential spill or leaking container and is inspected periodically by the ECC. A determination of a potential spill and the subsequent path of airborne pollutants would depend on a variety of variables including the meteorology at the time of the release. Such an analysis is beyond the scope of the Periodic Review. Please note that potential offsite impacts from oil field activities are discussed in Section 4.3 of the EIR for the CSD.

Comment #	Issue Area	Brief Description	Response
GLG-22 Gless	Operations	Question on high rate gravel packing and hydraulic fracturing well completion techniques.	Comment acknowledged, however, the referenced text correctly refers to the fact that hydraulic fracturing is not occurring at the oil field, the text is not referring to the well completion technique gravel packing.
GLG-23 Gless	Administrative	Typographical errors.	The County appreciates the input on the typographical errors, the referenced text has been corrected.
GLG-24 Gless	Operations Complaint Process	Multiple rigs in one area cause offsite impacts and subsequent public complaints.	Comment on the potential impacts of multiple drill rigs operating in one area is acknowledged. The County and the ECC have been coordinating with FM O&G to avoid scheduling multiple rigs in the same area. The ECC monitors the placement of the rigs during periodic inspections.
GLG-25 Gless	Operations	All well testing should be reported to the SCQAMD.	The referenced provision, E.32 Abandoned Well Testing, requires the operator to report the test results to DOGGR. The testing results have been submitted to DOGGR and the provision has not required any wells to be re-abandoned to date.
GLG-26 Gless	Operations	Well testing results.	Comment noted, however, the results of the E.32 Abandoned Well Testing have not required any wells to be re-abandoned to date. The SCAQMD Blue Sky Testing is a comprehensive field testing program that covers active wells, tanks, pipelines, etc. and is not focused on abandoned well testing.
GLG-27 Gless	Administrative	Correction to Periodic Review regarding reference to CAP meeting discussion.	The referenced text has been revised to acknowledge the comment in question was made by a CAP member as opposed to a member of the public.
GLG-28 Gless	Administrative	Comment on Periodic Review text regarding reference to CAP meeting discussion.	The referenced text includes discussion that the CAP noted the need for redundant equipment or other measures that could be implemented to prevent equipment failures of this type in the future.

Comment #	Issue Area	Brief Description	Response
GLG-29 Gless	Noise	Request that noise peak levels be used for compliance as opposed to hourly average values.	Request for peak level noise monitoring is acknowledged. Noise monitoring was re-evaluated during both the Settlement Agreement and for the Annual Well Increase Evaluation (December 2010). In addition, the Department of Public Health provided input during the preparation of the Periodic Review and did not recommend any changes to the monitoring program. A noise "spike" such as an instantaneous banging of pipe may not be captured by the hourly averaged noise monitoring program, however, a persistent nuisance type noise would be indicated in the monitoring. In addition, the complaint process under Provision F.7 provides for public input and documentation of noise issues.
GLG-30 Gless	Administrative	Draw down account information.	Comment is not clear, as noted in the Periodic Review, the draw-down account has been maintained at or above the $50,000 balance as required by this requirement since the adoption of the CSD. The County has not required an increase of the minimum balance of the draw-down account to date. Insurance requirements and the performance security are separate from the draw-down account.
GLG-31 Gless	Administrative	Comment on Periodic Review text regarding reference to CAP meeting discussion.	Comment acknowledged, the referenced incident was discussed at CAP meetings.

Comment #	Issue Area	Brief Description	Response
GLG-32 Gless	Administrative	Comment on Periodic Review text regarding reference to CAP meeting discussion.	Comment acknowledged, however, the referenced text notes that the CAP/public has requested that both the amounts for insurance and bonding be increased. Note that the CSD does not determine the amount of insurance required under Provision G.4 or the performance bond amount required under Provision G.5; the financial and technical requirements of these provisions are determined by the County CEO. As part of the Periodic Review, the County evaluated Provisions G.4 and G.5 and may perform additional review at any time independent of the Periodic Review process.
CAP-2 Gless	Geology	Ground movement study is incomplete and DOGGR requires more data.	Request that the annual ground movement survey be performed twice a year is acknowledged, see also GLG-14.
CAP-3 Gless	Signage	Request that the oil field post Prop 65 signage.	The oil field does have the referenced and requested Proposition 65 signage, the signs are posted on the oil field fence near the gated entrances.
GOL-1 Gosnell	Administrative	Support for the oil field and oil field operator.	No response is required.
GOL-2 Gosnell	Administrative	Note that DOGGR holds the regulatory jurisdiction for down hole activities.	Comment acknowledged that DOGGR has the jurisdiction on the down-hole activities at the Inglewood Oil Field.
GYK-1 Gyi	Air Quality Health Study	Health Study inadequate and should be redone.	Commenter input on the adequacy of the Community Health Study acknowledged.
HAD-1 Haake	Administrative	Periodic review process.	Comment provides review of CSD Periodic Review process, no response necessary.
HAD-2 Haake	Administrative	Periodic review process.	Comment provides review of CSD Periodic Review process, no response necessary.
HAD-3 Haake	Air Quality	Request for more meteorological stations.	Request for the need of additional meteorological stations to cover the entire oil field is acknowledged, however, additional stations are not required by the CSD and are not considered to be necessary.

Comment #	Issue Area	Brief Description	Response
HAD-4 Haake	Air Quality Health Study	Health Study inadequate.	Comment that the methodology used for the Community Health Risk Assessment was not adequate noted. The study was conducted by an experienced professional epidemiologist from the Public Health Department. The Public Health Department designed and conducted the study to professionally accepted standards.
HAD-5 Haake	Geology	Correlation of ground movement with oil field operations.	The issue of ground movement, oil production pressure, oil field water injection pressure, and reservoir balance was discussed at the March 27, 2014 CAP meeting. Mr. Michael Montgomery from the County provided a presentation on the subject and was assisted by DOGGR representatives John Geroch and Jason Marshall. DOGGR is currently reviewing the subject and has requested that FM O&G provide more data in an effort to better understand the relationship between ground movement and oil field activities. Additional information will be provided at the conclusion of the DOGGR study.
HAD-6 Haake	Operations	Request for information on the September 2010 leak at the Culver City Dog Park.	The September 2010 fluid release to the Culver City Dog Park was caused by seepage from an Atlantic Oil Company abandoned well which was abandoned in 1972. PXP, now FM O&G, Culver City, and DOGGR investigated the well and determined the well required remedial action to re-seal and re-abandon the well. FM O&G and Atlantic Oil completed the work and remediation work and the park was reopened March 3, 2011.

Comment #	Issue Area	Brief Description	Response
HEH-1 Heins	Air Quality Noise	Odor and noise issues impacts the surrounding community.	Odor complaints dated August 27, 2013, March 16, 2014, and April 8, 2014 noted. The commenter notes that the AQMD was contacted for each of the subject odor complaints and the County encourages the public to contact both FM O&G and the AQMD to report odors. CSD Provision E.5, Noise Attenuation, provides requirements to minimize noise including the Quiet Mode Drilling Plan which is required between the hours of 6:00 pm and 8:00 am.
KUJ-1 Kuechle	Administrative	Request for discussion of Periodic Review recommendation process at CAP meetings.	Request acknowledged; the results of the Periodic Review have been discussed at CAP meetings along with the rationale for the recommendations contained in the review.
KUJ-2 Kuechle	Administrative	Request for more analysis on CSD Provisions G.4 and G.5.	The CSD does not determine the amount of insurance required under Provision G.4 or the performance bond amount required under Provision G.5; the financial and technical requirements of these provisions are determined by the County CEO. As part of the Periodic Review, the County evaluated Provisions G.4 and G.5 and determined that no recommendations for changes were needed at this time. The County may perform additional review at any time independent of the Periodic Review process.
KUJ-3 Kuechle	Administrative	Request for more analysis on CSD Provisions G.4 and G.5.	The CSD does not determine the amount of insurance required under Provision G.4 or the performance bond amount required under Provision G.5; the financial and technical requirements of these provisions are determined by the County CEO. As part of the Periodic Review, the County evaluated Provisions G.4 and G.5 and may perform additional review at any time independent of the Periodic Review process.

Comment #	Issue Area	Brief Description	Response
KUJ-4 Kuechle	Administrative	Request for more analysis on CSD Provisions G.4 and G.5.	The CSD does not determine the amount of insurance required under Provision G.4 or the performance bond amount required under Provision G.5; the financial and technical requirements of these provisions are determined by the County CEO. As part of the Periodic Review, the County evaluated Provisions G.4 and G.5 and determined that no recommendations for changes were needed at this time. The County may perform additional review at any time independent of the Periodic Review process.
KUJ-5 Kuechle	Administrative	Request for more analysis on CSD Provisions G.4 and G.5.	The CSD does not determine the amount of insurance required under Provision G.4 or the performance bond amount required under Provision G.5; the financial and technical requirements of these provisions are determined by the County CEO. As part of the Periodic Review, the County evaluated Provisions G.4 and G.5 and determined that no recommendations for changes were needed at this time. The County may perform additional review at any time independent of the Periodic Review process.
KUJ-6 Kuechle	Administrative	Request that FM O&G focus the topic of the Community Meeting to oil field operations and be prepared to respond to input from the public.	Comment acknowledged, the County is working with FM O&G to be prepared and have resources available at the Community Meeting to answer questions from the public. FM O&G has provided issue area experts at recent CAP meetings, for example, a mineral rights/property rights consultant provided a presentation on oil lease rights and law at the July 24, 2014 CAP.
KUJ-7 Kuechle	Administrative	Request that FM O&G be prepared to respond to input from the public at CAP meetings.	Comment acknowledged, the County is working with FM O&G to be prepared and have resources available at the CAP meetings to answer questions from the public.

Comment #	Issue Area	Brief Description	Response
KUJ-8 Kuechle	Administrative	Request that documentation provided by FM O&G be legible.	Comment acknowledged; the County has requested that the watermarks on documents prepared and posted by FM O&G be of a much lighter tint such that the documents are legible.
CAP-4 Kuechle	Administrative	Request that documentation provided by FM O&G be legible.	See response to KUJ-8.
CAP-19 Kuechle	Administrative	Request for legend/key for map figures in Periodic Review.	Request to add a key to the cover sheet map acknowledged, the revised map contains a key.
CAP-20 Kuechle	Administrative	Request for legend/key for map figures in Periodic Review.	Request to improve the key to the map on page 4 is acknowledged, the revised map contains a key.
CAP-21 Kuechle	Administrative	Request to make the recommendations in the Periodic Review requirements.	Comment acknowledged, however, to make the recommendation a requirement would necessitate revising the provision language which does not affect the implementation of the recommendations and is not considered to be necessary. The County is not recommending a change to the provision language of the CSD at this time.
KUK-1 Kutcher	Administrative	Request that the Periodic Review analyze the potential for converting the oil field to a park.	CSD Provision G.7, *Periodic Review*, requires the County to conduct a comprehensive review of the provisions of the CSD to determine if the measures are "*adequately protecting the health, safety, and general welfare*". The potential conversion of the Inglewood Oil Field to park land is outside the scope of the Periodic Review.
KUK-2 Kutcher	Administrative	Request that the Periodic Review analyze various issues outside the scope of the CSD.	As noted in response KUK-1, the Periodic Review process is focused on analyzing the effectiveness of the provisions of the CSD. The document does address new technologies, see information provided under the *New Technology* section of each provision. Issues such as a sunset date for oil exploration, acquisition of park land, and an oil production tax are outside the scope of the Periodic Review.

Comment #	Issue Area	Brief Description	Response
KUK-3 Kutcher	Operations	Enhanced oil recovery techniques add safety risks to the surrounding community.	Comment that certain enhanced oil recovery techniques may increase the potential for earthquakes is acknowledged, however, note that the well completion technique, hydraulic fracturing, is not being used at the Inglewood Oil Field.
KUK-4 Kutcher		Request that the Periodic Review analyze the potential for converting the oil field to a park.	Please see response to comment KUK-1.
KUK-5 Kutcher	Administrative	Request that the Periodic Review analyze various issues outside the scope of the CSD.	The provisions of the CSD are intended to protect the health, safety, and general welfare of the community and environment. The results of the Periodic Review indicated the CSD is working as intended. Regarding new technologies, the Periodic Review includes discussion of applicable new technology as applicable for each CSD provision. Issues such as a sunset date for oil exploration, acquisition of park land, and an oil production tax are outside the scope of the Periodic Review.
MCD-1 McNeill	Administrative	Request that public input be an integral part of the Periodic Review process.	Comment acknowledged, the County will include input from the public and the members of the CAP in the analysis of the provisions of the CSD. To date, the Periodic Review has been discussed at several CAP meetings including the meeting on April 24, 2014 where specific comments on the document were solicited and documented. In addition, additional opportunities exist to provide comments during the public hearing process.

Comment #	Issue Area	Brief Description	Response
MCD-2 McNeill	Administrative	Request that resources be made available for environmental studies.	The County notes that most studies conducted for the CSD did not have any limitations regarding resources; examples include the EIR, the Settlement Agreement, and the Annual Well Increase Evaluation. In addition, during development of the scope for the Air Quality Study, additional funds were requested and obtained to augment the original budget. Although additional resources may enhance a particular study, the County has determined that the studies conducted to date for the Inglewood Oil Field have been more than adequate to reflect the impacts associated with operation of the oil field.
MCD-3 McNeill	Geology	Request that the ground movement survey be conducted twice per year and be coordinated with other regulatory agencies.	Request that the annual ground movement survey be performed twice a year is acknowledged. At this point, experts have not determined that increasing the frequency of data collection would contribute in any significant way to the ground movement study analysis. DOGGR is currently reviewing the subject and has requested that FM O&G provide more operational data in an effort to better understand the relationship between ground movement and oil field activities. Additional information will be provided at the conclusion of the DOGGR study.
MCD-4 McNeill	Biological	Request for comprehensive biological surveys.	The initial Special Status and Species Protection Plan, dated May 2009, provides an overview of the flora and fauna of the entire oil field. The Plan is available on the oil field web site.

Comment #	Issue Area	Brief Description	Response
MCD-5 McNeill	Water	Request that recycled water options be explored for use at the oil field.	The request that recycled water options for oil field use is acknowledged. The use of recycled water was researched during the preparation of the CSD EIR and the analysis determined that no pipeline exists that could deliver recycled water to the oil field; this remains the case to date. The County notes that storm water from the oil field catch basins is utilized for dust control by pumping the water to above ground tanks and then into water trucks.
MCD-6 McNeill	Water	Request that the ground water monitoring program include up gradient wells.	The request for up gradient groundwater monitoring locations was noted as a recommendation by the RWQCB in a letter dated October 17, 2012 and was discussed at the January 23, 2014 CAP meeting. The existing ground water monitoring system network was designed with input from the RWQCB and recent permits issued by RWQCB to FM O&G have not required up gradient monitoring locations. Additional monitoring sites are not deemed necessary and are not required by RWQCB at this time.
MCD-7 McNeill	Air Quality	Odorant used for Bio-Farms was inadequate to prevent offsite impacts.	Comment on the odor issue with the operation of the Bio-Farms and movement of soil at the oil field is acknowledged. Operation of the Bio-Farms was halted as a result of the SCQAMD inspection and subsequent violation. FM O&G is reviewing options and technologies regarding potential operation of the Bio-Farm operations and is permitted to re-start operation of them but does not currently have any plans to do so.
MCD-8 McNeill	Operations	Request that the use of in ground sumps or pits for drilling waste be prohibited.	The County concurs with the comment as reflected by the recommendation for Provision E.15.a. If the ground sumps are not currently being used at the Inglewood Oil Field and provisions prohibiting such a use are not necessary.

Comment #	Issue Area	Brief Description	Response
MCD-9 McNeill	Air Quality	Request to augment oil field dust/mud control measures.	Comment on dust and mud control and material leaving the oil field is acknowledged. The County notes that during rain events in 2013/2014 FM O&G augmented road cleaning and oil field exit rumble strips with vehicle washing at the Stocker Road exit gate. Additional dust control measures are outlined in the Fugitive Dust Control Plan.
MCD-10 McNeill	Administrative	Request for joint CAP/MACC meeting.	Request for a joint CAP/MACC meeting acknowledged and the issue has been discussed at CAP meetings. However, no regulatory mechanism exists to require other MACC agencies to agree to involve the public in the annual MACC process which, by design, is intended to be an internal agency compliance review as opposed to a public forum. MACC meeting results are shared and discussed with the CAP.
MCD-11 McNeill	Administrative	CAP membership and attendance.	Issues with CAP membership and attendance have been discussed at recent CAP meetings. The Director of DRP recently sent a letter out to CAP members reminding them of their obligations as a member of the CAP. The County is amenable to facilitating new CAP membership as applicable.
CAP-8 Sahli-Wells	Operations	Request to prohibit certain well stimulation methods.	Request to prohibit hydraulic fracturing and other well stimulation methods until regulations are in place is acknowledged, however, such an action is outside the scope of the Periodic Review. Please note that no hydraulic fracturing has been conducted at the oil field since the two test wells in 2011/2012. Hydraulic fracturing well completion is under the jurisdiction of DOGGR and the recently promulgated SB-4 regulations.
CAP-9 Sahli-Wells	Landscaping	Landscaping effort is behind schedule.	Comment on the status of the landscaping effort at the oil field is acknowledged, please see the Periodic Review recommendation for Provision E.10.

Comment #	Issue Area	Brief Description	Response
CAP-10 Sahli-Wells	Administrative	Request that resources be made available for environmental studies.	The County notes that most studies conducted for the CSD did not have any limitations regarding resources; examples include the EIR, the Settlement Agreement, and the Annual Well Increase Evaluation. In addition, during development of the scope for the Air Quality Study, additional funds were requested and obtained to augment the original budget. Although additional resources may enhance a particular study, the County has determined that the studies conducted to date for the Inglewood Oil Field have been more than adequate to reflect the impacts associated with operation of the oil field.
CAP-11 Sahli-Wells	Administrative	Request that public noticing be enhanced.	Oil field activities and compliance with the CSD are discussed at the monthly CAP meetings. Notice of the CAP meetings is accomplished by email of the meeting agenda to CAP members and interested members of the public. As CAP members are representatives of various neighborhood and community groups, it is expected that the CAP members provide information and notice of issues of interest to those groups. In addition, the County and FM O&G web sites contain a substantial amount of information on the oil field and CSD compliance.
CAP-12 Sahli-Wells	Administrative	Request for joint CAP/MACC meeting.	Request for a joint CAP/MACC meeting acknowledged and the issue has been discussed at CAP meetings. However, no regulatory mechanism exists to require other MACC agencies to agree to involve the public in the annual MACC process which, by design, is intended to be an internal agency compliance review as opposed to a public forum.
CAP-13 Sahli-Wells	Safety	Request for public involvement in oil field safety drills.	Request that ERP drills include neighbors is acknowledged, however, public involvement in the ERP drills is not necessary and would potentially interfere with the proper implementation of the drills.

Comment #	Issue Area	Brief Description	Response
CAP-14 Sahli-Wells	Administrative	The new technology analysis in the Periodic Review needs to be enhanced.	Request that new technology be further explored in the Periodic Review is noted, the County has provided a discussion on new technology for each provision of the Periodic Review as applicable.
CAP-15 Sahli-Wells	Administrative	Request for more analysis on CSD Provisions G.4 and G.5.	The CSD does not determine the amount of insurance required under Provision G.4 or the performance bond amount required under Provision G.5; the financial and technical requirements of these provisions are determined by the County CEO. As part of the Periodic Review, the County evaluated Provisions G.4 and G.5 and determined that no recommendations for changes were needed at this time. The County may perform additional review at any time independent of the Periodic Review process.
CAP-16 Sahli-Wells	Administrative	CAP membership and attendance.	Issues with CAP membership and attendance have been discussed at recent CAP meetings. The Director of the DRP recently sent a letter out to CAP members reminding them of their obligations as a member of the CAP. The County is amenable to facilitating new CAP membership as applicable.
CAP-17 Sahli-Wells	Administrative	Drilling operations should be consolidated to allow for open park space.	CSD Provision G.7, *Periodic Review*, requires the County to conduct a comprehensive review of the provisions of the CSD to determine if the measures are "*adequately protecting the health, safety, and general welfare*". The potential conversion of the Inglewood Oil Field to park land is outside the scope of the Periodic Review.
CAP-18 Sahli-Wells	Air Quality	General comment on GHGs.	The City of Culver City concern on GHG gases, GHG emission from drilling activities at the oil field, and the State GHG legislation and goals is acknowledged. The EIR for the CSD addressed GHGs and no additional requirements are needed at this time.
CAP-5 Steva	Administrative	Administrative	Comment from CAP member that the CHC will be providing a comment letter, no response is necessary.

Comment #	Issue Area	Brief Description	Response
CAP-6 Steva	Administrative	Recommendations in the Periodic Review should be strengthened.	Comment from CAP member to strengthen the recommendations, comment acknowledged. The Periodic Review contains eleven recommendations to enhance the implementation and effectiveness of the CSD. A summary of those recommendations in listed in Section 1.6 of the document.
CAP-7 Steva	Air Quality	Air quality study was not conclusive	Comment from CAP member that the air quality/public health study was not conclusive and should be, comment acknowledged. The study was conducted by an experienced professional epidemiologist from the Public Health Department. The Public Health Department designed and conducted the study to professionally accepted standards.
WAY-1 Watson	Air Quality	Request for more meteorological stations.	Request for the need of additional meteorological stations to cover the entire oil field acknowledged, however, additional stations were not determined to be necessary by the CSD EIR.
WIT-1 WIT-2 Williams	Air Quality	Request for more meteorological stations.	Request for the need of additional meteorological stations to cover the entire oil field acknowledged, however, additional stations were not determined to be necessary by the CSD EIR.
WIT-3 Williams	Air Quality	Odor complaint process.	Potential sources and potential offsite impacts of gases is included in the EIR for the CSD; please see Sections 4.1 and 4.2. No additional emissions beyond those projected in the EIR have occurred. In fact, the majority of the odor complaints received since the adoption of the CSD were found to be not associated with oil field operations.
WIT-4 Williams	Air Quality	Odor complaint process.	Comment noted, however, the CSD EIR did not determine the need for dense gas modeling.
WIT-5 Williams	Air Quality	Odor complaint process.	Comment acknowledged, the ECC has worked with FM O&G to include wind direction and wind speed information as part of the investigation of odor complaints at the oil field.

Comment #	Issue Area	Brief Description	Response
WIT-6 Williams	Air Quality	Odor complaint process.	Comment noted, however, the provisions of the CSD do not require portable meteorological stations as part of the response and investigation into odor complaints.
WIT-7 Williams	Air Quality	Odor complaint process.	Comment noted, however, oil field air quality monitoring to date has not detected pollutants at the concentrations noted in the comment.
WIT-8 Williams	Air Quality	Health risk assessment recommendations.	Comment noted, however, oil field air quality monitoring to date has not detected pollutants at the concentrations noted in the comment.
WIT-9 Williams	Air Quality	Health risk assessment recommendations.	Comment noted, however, the HRA was completed pursuant to the requirements of the CSD. In addition, the STI Baldwin Hills Air Quality Study, report released in February 2015, provided updated information on the potential health risk of the Inglewood Oil Field.
WIT-10 WIT-11 WIT-12 WIT-13 WIT-14 Williams	Air Quality	Health risk assessment recommendations.	Comment on updating the HRA with odor complaint data is acknowledged, however, odor complaints are followed up pursuant to the requirements of the CSD. Further, it is outside the scope of the Periodic Review to direct the County Public Health Department to conduct an additional HRA at this time. Note that the STI Baldwin Hills Air Quality Study, report released in February 2015, provided updated information on the potential health risk of the Inglewood Oil Field.
WIT-15 Williams	Geology	Request for monthly ground movement surveys.	Request for monthly ground movement surveys is acknowledged. At this point, experts have not determined that increasing the frequency of data collection would contribute in any significant way to the ground movement study analysis. DOGGR is currently reviewing the subject and has requested that FM O&G provide more operational data in an effort to better understand the relationship between ground movement and oil field activities. Additional information will be provided at the conclusion of the DOGGR study.

Comment #	Issue Area	Brief Description	Response
WIT-16 Williams	Geology	Ground movement surveys should be correlated with bottom holed data.	The requested studies and surveys are not required by the provisions of the CSD and have not been required by DOGGR, Public Works, or any other regulatory agency to date.
WIT-17 Williams	Geology	Ground movement surveys should be correlated with field pressure data.	The requested studies and surveys are not required by the provisions of the CSD and have not been required by DOGGR, Public Works, or any other regulatory agency to date.
WIT-18 WIT-19 Williams	Geology	Request for additional ground movement survey markers.	The requested studies and surveys are not required by the provisions of the CSD and have not been required by DOGGR or any other regulatory agency to date. However, due to potential interference from tree roots or other issues, twelve survey markers were added in 2014 with baseline measurements taken during the 2014 survey. The original twelve markers were left in place and will continue to be surveyed.
WIT-20 Williams	Geology	Ground movement surveys should be correlated with well and field pressure data.	The requested studies and surveys are not required by the provisions of the CSD and have not been required by DOGGR or any other regulatory agency to date.
WIT-21 WIT-22 WIT-23 WIT-24 WIT-25 WIT-26 Williams	Operations	Request for more information on the oil field leak incident at the Dog Park.	The September 2010 fluid release to the Culver City Dog Park was caused by seepage from an Atlantic Oil Company abandoned well which was abandoned in 1972. PXP, now FM O&G, Culver City, and DOGGR investigated the well and determined the well required remedial action to re-seal and re-abandon the well. FM O&G and Atlantic Oil completed the work and remediation work and the park was reopened March 3, 2011.
WIT-27 Williams	Administrative	Request for data.	The requested information and data are not required by the provisions of the CSD and are outside the scope of the Periodic Review. Requests for information relating to DOGGR permits should be made to DOGGR.

Comment #	Issue Area	Brief Description	Response
WIT-28 Williams	Administrative	Request for data.	The requested information and data are not required by the provisions of the CSD and are outside the scope of the Periodic Review. Requests for information relating to DOGGR permits should be made to DOGGR.
Organizations			
CHC-1 Community Health Councils	Administrative	Request that resources be made available for environmental studies.	The County notes that most studies conducted for the CSD did not have any limitations regarding resources; examples include the EIR, the Settlement Agreement, and the Annual Well Increase Evaluation. In addition, during development of the scope for the Air Quality Study, additional funds were requested and obtained to augment the original budget. Although additional resources may enhance a particular study, the County has determined that the studies conducted to date for the Inglewood Oil Field have been more than adequate to reflect the impacts associated with operation of the oil field.
CHC-2 Community Health Councils	Administrative	Request for additional analysis in the Periodic Review regarding new technology and insurance/bonding.	Request that new technology be further explored in the Periodic Review is noted, the County has provided a discussion on new technology for each provision of the Periodic Review as applicable. Regarding the potential use of an electrical drill rig, as discussed at the October 24, 2013 CAP meeting, the existing power supply available to the oil field is not sufficient to power an electric drill rig. Regarding insurance and bonding, the CSD does not determine the amount of insurance required under Provision G.4 or the performance bond amount required under Provision G.5; the financial and technical requirements of these provisions are determined by the County CEO. As part of the Periodic Review, the County evaluated Provisions G.4 and G.5 and may perform additional review at any time independent of the Periodic Review process.

Comment #	Issue Area	Brief Description	Response
CHC-3 CHC-4 Community Health Councils	Administrative	Request for additional data access for the public.	The County DRP does not have the jurisdiction to require other County agencies, the SCAQMD, or State agencies to post their permits or compliance documents for the Inglewood Oil Field. Further, the provisions of the CSD do not require FM O&G to post the permits or compliance documents from other County agencies, the SCAQMD, or State agencies. Interested members of the public may view applicable compliance documents on the FM O&G Inglewood Oil Field web site and/or the County DRP web site. The FM O&G Inglewood Oil Field web site is a requirement under Provision J.2 of the CSD and is a separate informational resource from the DRP web site. Members of the public can also attend the monthly CAP meetings which are facilitated in an open forum format whereby questions and comments are welcome by any attendee. In addition, the annual community meeting presents an opportunity for the public to get updates on oil field operations.
CHC-5 Community Health Councils	Administrative	Notification and review time of oil field documents.	As discussed at CAP meeting, the County has worked with the CAP membership to assure that adequate time has been made available for review and comment on the Periodic Review. All comments on the Periodic Review were responded to and included in the appendices of the document. The County does not restrict review of information compliance documents such as the complaint log, CAP members and members of the public may provide comment or questions on these documents at any time.

Comment #	Issue Area	Brief Description	Response
CHC-6 Community Health Councils	Administrative	CAP membership and attendance.	Issues with CAP membership and attendance have been discussed at recent CAP meetings. The Director of DRP recently sent a letter out to CAP members reminding them of their obligations as a member of the CAP. The County is amendable to facilitating new CAP membership as applicable. Request for a joint CAP/MACC meeting acknowledged and the issue has been discussed at CAP meetings. Regarding the FM O&G representative for the CAP meetings, FM O&G is in compliance with the provisions of the CSD regarding the designation of an ombudsperson.
CHC-7 Community Health Councils	Operations	Request for fire prevention study.	Comment on the City of Culver City's concern for the potential of wild fires is acknowledged. It is beyond the scope of the Periodic Review and the provisions of the CSD to required Southern California Edison, City and County Fire Departments to conduct a study on fire prevention at the oil field. CSD provisions E.1, *Fire Protection and Response*, and F.4, *Annual Emergency Response Drills of the County and Culver City Fire Departments*, provide requirements for emergency response and preparedness for wild fire emergencies.

Comment #	Issue Area	Brief Description	Response
CHC-8 Community Health Councils	Air Quality	Request for additional air quality monitoring.	The Inglewood Oil Field is subject to SCAQMD Rule 1173, *Fugitive Emissions of Volatile Organic Compounds.* As described in Section (a) of the regulation, *"the rule is intended to control volatile organic compounds leaks from valves, fittings, pumps, compressors, pressure relief devices, diaphragms, hatches, sight-glasses, and meters at refineries, chemical plants, oil and gas production fields, natural gas processing plants, and pipeline transfer stations".* Therefore, monitoring for volatile organic compounds is being conducted at the oil field and is accomplished by a third party inspector on a quarterly basis. Results of the inspections are submitted and reviewed by the SCAQMD. The air monitoring equipment at the gas plant and the portable monitors that are stationed near the drilling equipment are capable of detecting a spike in emissions and are designed to alarm should one be detected. Please note that the documents noted in the comment are referencing unconventional natural gas development techniques such as hydraulic fracturing for the extraction of natural gas from shale deposits. This type of natural gas extraction is not used at the Inglewood Oil Field.

Comment #	Issue Area	Brief Description	Response
CHC-9 Community Health Councils	Noise	Request that noise peak levels and noise monitoring methodology be re-evaluated.	Noise monitoring was re-evaluated during both the Settlement Agreement and for the Annual Well Increase Evaluation (December 2010). In addition, the Department of Public Health provided input during the preparation of the Periodic Review and did not recommend any changes to the monitoring program. A noise "spike" such as an instantaneous banging of pipe may not be captured by the hourly averaged noise monitoring program, however, a persistent nuisance type noise would be indicated in the monitoring. In addition, the complaint process under Provision F.7 provides for public input and documentation of noise issues.
CHC-10 Community Health Councils	Landscaping	Landscaping effort should be enhanced and accelerated.	The County agrees with the comment that additional landscaping would help with both dust control and the visual aesthetics of the oil field. The Draft Periodic Review recommends accelerating the schedule for the landscaping program.
CHC-11 Community Health Councils	Operations	Unconventional well completion techniques should be evaluated.	Comment on the concern for certain enhanced oil recovery techniques is acknowledged, however, note that the well completion technique hydraulic fracturing is not being used at the Inglewood Oil Field. Down-hole well completion techniques are regulated by DOGGR and are outside the scope of the Periodic Review. The County notes that the chemicals used in well completions at the oil field are reported to the SCAQMD under Rule 1148.2 and the data is available to the public via the SCAQMD Rule 1148.2 web portal.
CHC-12 Community Health Councils	Operations	Request for land for park expansion.	CSD Provision G.7, *Periodic Review*, requires the County to conduct a comprehensive review of the provisions of the CSD to determine if the measures are "*adequately protecting the health, safety, and general welfare*". The potential conversion of the Inglewood Oil Field to park land is outside the scope of the Periodic Review.

Comment #	Issue Area	Brief Description	Response
CHC-13 Community Health Councils	Operations	Request to concentrate well activities away from oil field boundaries.	CSD Provision G.7, *Periodic Review*, requires the County to conduct a comprehensive review of the provisions of the CSD to determine if the measures are "*adequately protecting the health, safety, and general welfare*". The CSD does not require the operator to shrink the size of the oil field, therefore, such a recommendation is outside the scope of the Periodic Review.
Agencies			
CUL-1 Culver City	Operations	Request to prohibit certain well stimulation methods.	Comment acknowledged, however, down-hole operations such as well completions including hydraulic fracturing is outside the scope of the regulatory jurisdiction of the County. Down-hole operations are regulated by DOGGR.
CUL-2 Culver City	Landscaping	Landscaping effort is behind schedule.	The County agrees with the comment that additional landscaping would help with both dust control and the visual aesthetics of the oil field. The Periodic Review recommends accelerating the schedule for the landscaping program.
CUL-3 Culver City	Administrative	Request that resources be made available for environmental studies.	The County notes that most studies conducted for the CSD did not have any limitations regarding resources; examples include the EIR, the Settlement Agreement, and the Annual Well Increase Evaluation. In addition, during development of the scope for the Air Quality Study, additional funds were requested and obtained to augment the original budget. Although additional resources may enhance a particular study, the County has determined that the studies conducted to date for the Inglewood Oil Field have been more than adequate to reflect the impacts associated with operation of the oil field.

Comment #	Issue Area	Brief Description	Response
CUL-4 Culver City	Administrative	Request that public noticing be enhanced.	Oil field activities and compliance with the CSD are discussed at the monthly CAP meetings. Notice of the CAP meetings is accomplished by email of the meeting agenda to CAP members and interested members of the public. As CAP members are representatives of various neighborhood and community groups, it is expected that the CAP members provide information and notice of issues of interest to those groups. In addition, the County and FM O&G web sites contain a substantial amount of information on the oil field and CSD compliance.
CUL-5 Culver City	Administrative	Request for greater public notification of oil field operations.	One of the main purposes of the CAP is to provide a forum for discussion of oil field activities and issues. As the CAP meets monthly, sufficient opportunity for the public to obtain information about the oil field exists. Further, the Periodic Review and EQAP Audit reports provide an overview of the compliance status of all the provisions of the CSD and is a public document.
CUL-6 Culver City	Geology	Request for consultant review of ground monitoring survey data and reports.	The issue of ground movement, oil production pressure, oil field water injection pressure, and reservoir balance was discussed at the March 27, 2014 CAP meeting. Mr. Michael Montgomery from the County provided a presentation on the subject and was assisted by DOGGR representatives John Geroch and Jason Marshall. DOGGR is currently reviewing the subject and has requested that FM O&G provide more data in an effort to better understand the relationship between ground movement and oil field activities. Additional information will be provided at the conclusion of the DOGGR study.

Comment #	Issue Area	Brief Description	Response
CUL-7 Culver City	Administrative	Request for joint CAP/MACC meeting.	No regulatory mechanism exists to require other MACC agencies to agree to involve the public in the annual MACC process which, by design, is intended to be an internal agency compliance review as opposed to a public forum.
CUL-8 Culver City	Operations	Surrounding neighborhood should be included in emergency response plans.	The Emergency Response Plan for the oil field is subject to review the following agencies: DOGGR, California Department of Fish and Wildlife Office of Spill Prevention and Response (OSPR), U.S. Environmental Protection Agency Region 9, California State Lands Commission Marine Facilities Division Planning Branch, and the U.S. Department of Transportation Office of Pipeline Safety. The ERP is utilized in annual drills as required by CSD Provision F.4. The evacuation routes for the surrounding neighbors and neighborhoods is outside the scope of the oil field ERP and the CSD. The public is encouraged to contact their neighborhood Fire Department for assistance on planning evacuation routes.
CUL-9 Culver City	Administration	Periodic Review should include discussion on new technology to reduce offsite impacts.	The County has provided a discussion on new technology for each provision of the Periodic Review as applicable.
CUL-10 Culver City	Administration	Comments detailed in the Community Health Councils comment letter are included by reference to the Culver City comments.	The fact that the City of Culver City supports and incorporated by reference the following comments on the Periodic Review is acknowledged: Community Health Councils, Natural Resources Defense Council, the City Project, and Mujeres de la Tierra comment letter dated April 28, 2014; comments submitted by John Kuechle, via email and letter on April 6, 2014j; and the comment letter submitted by Kenneth Kutcher on April 25, 2014.
CUL-11 Culver City	Operations	Request to prohibit certain well stimulation methods.	Down-hole operations such as well completions including hydraulic fracturing is outside the scope of the regulatory jurisdiction of the County. Down-hole operations are regulated by DOGGR.

Comment #	Issue Area	Brief Description	Response
CUL-12 Culver City	Landscaping	Landscaping effort should be enhanced.	The County agrees with the comment that additional landscaping would help with both dust control and the visual aesthetics of the oil field. The Draft Periodic Review recommends accelerating the schedule for the landscaping program.
CUL-13 Culver City	Administrative	Request that resources be made available for environmental studies.	The County notes that most studies conducted for the CSD did not have any limitations regarding resources; examples include the EIR, the Settlement Agreement, and the Annual Well Increase Evaluation. In addition, during development of the scope for the Air Quality Study, additional funds were requested and obtained to augment the original budget. Although additional resources may enhance a particular study, the County has determined that the studies conducted to date for the Inglewood Oil Field have been more than adequate to reflect the impacts associated with operation of the oil field.
CUL-14 Culver City	Administrative	Request for greater public notification of oil field operations.	See response to CUL-5.
CUL-15 Culver City	Geology	Request for additional resources for the ground monitoring survey data and reports.	The issue of ground movement, oil production pressure, oil field water injection pressure, and reservoir balance was discussed at the March 27, 2014 CAP meeting. Mr. Michael Montgomery from the County provided a presentation on the subject and was assisted by DOGGR representatives John Geroch and Jason Marshall. DOGGR is currently reviewing the subject and has requested that FM O&G provide more data in an effort to better understand the relationship between ground movement and oil field activities. Additional information will be provided at the conclusion of the DOGGR study.

Comment #	Issue Area	Brief Description	Response
CUL-16 Culver City	Administrative	Request for joint CAP/MACC meeting.	No regulatory mechanism exists to require other MACC agencies to agree to involve the public in the annual MACC process which, by design, is intended to be an internal agency compliance review as opposed to a public forum.
CUL-17 Culver City	Operations	Surrounding neighborhood should be included in emergency response plans.	See response to CUL-8.
CUL-18 Culver City	Air Quality	Concern on GHG gas issue and GHG emissions of oil field.	The City of Culver City concern on GHG gases, GHG emission from drilling activities at the oil field, and the State GHG legislation and goals is acknowledged.
CUL-19 Culver City	Administration	Periodic Review should include discussion on new technology to reduce offsite impacts.	The County has provided a discussion on new technology for each provision of the Periodic Review as applicable.
CUL-20 Culver City	Administration	Request for more analysis on CSD Provisions G.4 and G.5.	The CSD does not determine the amount of insurance required under Provision G.4 or the performance bond amount required under Provision G.5; the financial and technical requirements of these provisions are determined by the County CEO. As part of the Periodic Review, the County evaluated Provisions G.4 and G.5 and may perform additional review at any time independent of the Periodic Review process.
CUL-21 Culver City	Administration	CAP membership and attendance.	Issues with CAP membership and attendance have been discussed at recent CAP meetings. The Director of DRP recently sent a letter out to CAP members reminding them of their obligations as a member of the CAP. The County is amendable to facilitating new CAP membership as applicable.
CUL-22 Culver City	Administration	Request to strengthen the recommendations made in the Periodic Review.	Recommendations will be made to the Hearing Officer to decide how to move forward with the results and recommendations of the Periodic Review.
CUL-23 Culver City	Administration	Periodic Review language clarification.	Recommendations to the provisions of the CSD can be made during each Periodic Review process, thus either of the two referenced language styles are correct.