

Timothy Stapleton

From: John Kuechle [REDACTED]
Sent: Monday, November 24, 2014 7:10 AM
To: Timothy Stapleton
Cc: David McNeill; Luis Perez
Subject: Next Meeting

Tim,

Do you know yet whether the CAP will be meeting in December?

Whether we do or not, I have a few items that I would like to have included on our next agenda.

1. I would like to receive a further report on the pumping operation that FMO&G is planning to begin in very close proximity to several homes. Procedurally, I would like to know why FMO&G did not let anyone know about this before all of the equipment was installed and a neighbor complained. (I know they did not tell the CAP, and the email from Luis sounded as though my email was the first he had heard about it.) Substantively, I would like to know what permits and other approvals will be required by the County. I would also like to know whether this operation (which for all I know may produce noise at a level equivalent to a drill rig) will be subject to the same noise controls that are imposed on drilling. I have quoted a few of those provisions below - but it would seem they are applicable only if the pumps are treated as being part of "oil operations" or "oil field equipment." It would further seem that the late night quiet operations provisions may not apply.

To the extent the County's position is that any of these provisions do not apply, I would like to ask that the (still pending) proposal for updating the CSD be expanded to include comparable noise protections for operations such as this one.

Here are some of the noise provisions that I am referring to:

A. 5.a.i "All oil operations on the oil field shall comply with the noise provisions of Chapter 12.08 of Title 12 of the County Code."

B. 5.a.iii "Noise produced by oil operations shall include no pure tones when measured at a developed area."

C. 5.c. "All drilling and redrilling on the oil field between the hours of 6:00 p.m. and 8:00 a.m. shall be conducted in conformity with a quiet mode drilling plan."

D. 5.d "All noise producing oil field equipment shall be regularly serviced and repaired to minimize increases in pure tones and other noise output over time. The operator shall maintain an equipment service log for all noise-producing equipment."

E. 5.h "All construction equipment shall be selected for low-noise output. All construction equipment powered by internal combustion engines shall be properly muffled and maintained."

2. At the largely useless annual oil field meeting, 3 questions were raised that PXP said they could not answer, but promised to address at the next CAP meeting. I would like to see these on the agenda so there is no further delay.

A. Apparently as part of the resolution of a recent AQMD citation, PXP incinerated some contaminated soil. The question asked how much soil was incinerated. (It probably also asked for more details about the operation, but my notes are not very good.) Candice originally shouted that PXP would never provide this information, but John Martini said they would look into it and provide as much information as they could. (If they do not answer this question, I would like to know why not. While Paul will almost certainly want more information, I would personally be satisfied if a full answer to the question were provided to the County.)

B. Paul also asked for the down hole location of each of the slant wells that PXP has told us extend from the oil field to areas outside the field.

C. Finally, there was a question about methanol. I did not write down the details, but it had to do with an inaccurate answer PXP gave the previous year to the question of whether methanol was used at the field.

Happy Thanksgiving,

John Kuechle