



Unused or Abandoned Equipment Removal Plan Inglewood Oil Field

**Baldwin Hills CSD Title 22, Chapters 310.050.U.1 and
310.120.N.1**

Settlement Agreement Term 15

Updated December 2022

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Document Revisions

| Revision No. | Revision Date | Modification Description | Affected Document Sections |
|--------------|---------------|--|---|
| 1 | August 2010 | Demolition and offsite debris management of items 44 through 64 | Section 2.2, Figure 1 |
| 2 | December 2012 | Demolition and offsite debris management of items 65 through 68 | Section 2.2, Figure 1 |
| 3 | December 2013 | Demolition and offsite debris management of item 69 | Section 2.2, Figure 1 |
| 4 | December 2017 | Change of operator from Freeport McMoran O&G to Sentinel Peak Resources California LLC | Title Page |
| 5 | December 2021 | Demolition and offsite debris management of items 70 through 78, and regulatory references compliant with Title 22 | Sections 1 and 2; Figure 1 |
| 6 | December 2022 | Demolition and offsite debris management of items 79 through 86; and document revisions table. | Section 2.2, Figure 1; Document Revisions on page 2 of 6. |
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1 Introduction

In 2017 Sentinel Peak Resources California LLC (SPR), became the operator of the Inglewood Oil Field which is located in the Baldwin Hills zoned district of Los Angeles County. The Inglewood Oil Field, formerly operated by Freeport-McMoRan Oil & Gas (FM O&G), and Plains Exploration and Production (PXP), covers approximately 1,000 acres and is surrounded by single and multiple family dwellings as well as recreational, institutional, commercial, and industrial uses. To address issues of land use compatibility with surrounding land uses, the Los Angeles County Board of Supervisors adopted the Baldwin Hills Community Standards District (CSD) in 2008 to provide a means of implementing regulations, safeguards, and controls for activities related to drilling for and producing oil and gas within the Inglewood Oil Field.

1.1 CSD/Settlement Agreement Requirements

The following CSD conditions require a plan for identification and removal of unused or abandoned equipment is as follows:

Title 22, Chapter 310.050, Section U.1 (formerly CSD Section E. 21. A)

Equipment Removal. All facilities that have reached the end of their useful economic life shall be properly decommissioned and removed from the oil field within one year. Areas not slated for future use shall be restored and revegetated within 90 days of termination of use, unless such restoration and revegetation would interfere with fire safety or access to oil operations.

Title 22, Chapter 310.120, Section N.1 (formerly CSD Section L.14)

Oil Field Cleanup and Maintenance. Within 180 days following the effective date, or at such later date as may be approved by the director for good cause shown, the operator shall develop and submit to the director, for review and approval, an unused or abandoned equipment removal plan identifying all equipment at the oil field that is no longer in service and can be removed. This plan shall provide an inventory of all unused equipment and procedures for testing and handling the equipment pursuant to the operator's health and safety protocol. The plan shall identify a schedule for removal of the out of service equipment. The operator shall take such actions as may be necessary for the plan to be approved by the director. The plan shall be implemented in accordance with the schedule for removal contained therein, and in all events, shall be fully implemented within one year of the director's approval, unless extended by the director for good cause shown. A compliance report shall be filed with the director semi-annually until all the unused or abandoned equipment identified in the plan has been removed.

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Any equipment not identified for decommissioning and removal in PXP's 2009 Clean-Up Plan (Section 22.44.142.E.21.a) that becomes unused or abandoned should be identified for removal in an updated plan. On an annual basis, if no updated removal plan is submitted by PXP, the Department shall inquire of PXP if any additional equipment has been abandoned or is no longer used such that a new plan is required. As part of the annual EQAP audit, the County shall conduct a review of equipment at

the site to determine if additional equipment should be removed. If there is such equipment, the Department shall require an updated removal plan.

2 Equipment Removal Plan

2.1 Plan Overview

This report presents the plan for removal of unused or abandoned equipment on-site at the Inglewood Oil Field in accordance with CSD requirements set forth in *Title 22, Chapter 310.120, Section N.1* of the CSD. The removal plan identifies all equipment at the oil field that is no longer in service and has been removed. The plan provides an inventory of qualifying equipment, the corresponding schedule for removal of said equipment, and addresses appropriate procedures and policies for removal.

Title 22, Chapter 310.050, Section U.1 of the CSD is currently being satisfied through the combination of proposed CSD compliance and existing operations. This proposed removal plan satisfies sub-section A – Equipment Removal. Sub-section C – Site Debris and Vegetation is addressed by SPR separately with the Equipment Storage Screening Strategy report. There will be a periodic review to identify any facilities that have reached the end of their useful economic life. A timeline for removal will be included in the annual update if one is required pursuant to Term 15 of the Settlement Agreement.

2.2 Abandoned Equipment Inventory & Removal Schedule

The previous equipment removal/abandonment inventory was submitted to Los Angeles County in December 2021. Items 79 through 86 as listed in in Figure 1 were demolished and removed as debris from the Inglewood Oil Field in 2022. Figure 1 provides the inventory of all abandoned or unused equipment that has been removed in compliance with the CSD conditions as referenced in Section 1.1 of this Plan. SPR has no planned equipment decommissioning or abandonment activities in the near term. If conditions change, an update to the equipment removal/abandonment inventory will be made at that time in accordance with the procedures outlined Section 2.3, below.

Figure 1 - Abandoned Equipment Inventory and Removal Schedule

| Item # | Inventory Item | Location | Testing & Handling Requirements | Actual Removal Date |
|--------|--------------------------|-----------------------|--|---------------------|
| 1 | Piping and old equipment | Old Yard | Lead & Asbestos per EHS 2.17 (example) | 2/4/2008 |
| 2 | Stock Wash Tank | STK TNK Setting | Lead & Asbestos per EHS 2.17 (example) | 3/1/2008 |
| 3 | Stock Wash Tank | STK TNK Setting | Lead & Asbestos per EHS 2.17 (example) | 3/2/2008 |
| 4 | Waste Water Tank | Shell Tank Setting | Lead & Asbestos per EHS 2.17 (example) | 4/15/2008 |
| 5 | Waste Water Tank | Shell Tank Setting | Lead & Asbestos per EHS 2.17 (example) | 4/16/2008 |
| 6 | Wash Tank | Shell Tank Setting | Lead & Asbestos per EHS 2.17 (example) | 4/17/2008 |
| 7 | Stock Tank | Shell Tank Setting | Lead & Asbestos per EHS 2.17 (example) | 4/18/2008 |
| 8 | Wash Tank | Rubel Setting | Lead & Asbestos per EHS 2.17 (example) | 6/11/2008 |
| 9 | Slop Tank | Rubel Setting | Lead & Asbestos per EHS 2.17 (example) | 6/11/2008 |
| 10 | 22188 Tank | Rubel Setting | Lead & Asbestos per EHS 2.17 (example) | 6/11/2008 |
| 11 | 25086 Tank | Rubel Setting | Lead & Asbestos per EHS 2.17 (example) | 6/11/2008 |
| 12 | Slop Tank | Unit Water Plant | Lead & Asbestos per EHS 2.17 (example) | 7/14/2008 |
| 13 | Wemco | Unit Water Plant | Lead & Asbestos per EHS 2.17 (example) | 7/15/2008 |
| 14 | Pumps and Piping | Unit Water Plant | | 7/16/2008 |
| 15 | 5k Waste Water Tank | Rubel Setting | Lead & Asbestos per EHS 2.17 (example) | 7/31/2008 |
| 16 | Stock Tank | LAI 5k Setting | Lead & Asbestos per EHS 2.17 (example) | 8/13/2008 |
| 17 | Stock Tank | LAI 5k Setting | Lead & Asbestos per EHS 2.17 (example) | 8/13/2008 |
| 18 | STK Fresh Water Tank | East of water tk | Lead & Asbestos per EHS 2.17 (example) | 8/21/2008 |
| 19 | Wash Tank | Cone Tank Setting | Lead & Asbestos per EHS 2.17 (example) | 8/28/2008 |
| 20 | Stock Tank | Cone Tank Setting | Lead & Asbestos per EHS 2.17 (example) | 8/28/2008 |
| 21 | 75X190 Tank | TVIC Water Plant | Lead & Asbestos per EHS 2.17 (example) | 9/22/2008 |
| 22 | 85C91M Tank | TVIC Water Plant | Lead & Asbestos per EHS 2.17 (example) | 9/23/2008 |
| 23 | 03M91P Tank | TVIC Water Plant | Lead & Asbestos per EHS 2.17 (example) | 9/24/2008 |
| 24 | Wash Tank | TVIC Water Plant | Lead & Asbestos per EHS 2.17 (example) | 9/25/2008 |
| 25 | Stock Tank | Dour Tank Setting | Lead & Asbestos per EHS 2.17 (example) | 11/18/2008 |
| 26 | Wash Tank | Dour Tank Setting | Lead & Asbestos per EHS 2.17 (example) | 11/18/2008 |
| 27 | Wash Tank | Dour Tank Setting | Lead & Asbestos per EHS 2.17 (example) | 11/18/2008 |
| 28 | Piping | Dour Tank Setting | | 11/19/2008 |
| 29 | Slop Tank | Cone Tank Setting | Lead & Asbestos per EHS 2.17 (example) | 12/1/2008 |
| 30 | TVIC Gauge Tank | TVIC LACT | Lead & Asbestos per EHS 2.17 (example) | 1/23/2009 |
| 31 | TVIC Gauge Tank | TVIC LACT | Lead & Asbestos per EHS 2.17 (example) | 1/23/2009 |
| 32 | 7 Vessels | TVIC LACT | Lead & Asbestos per EHS 2.17 (example) | 1/23/2009 |
| 33 | Heater Treater | VIC 2 Setting | | 1/25/2009 |
| 34 | Heater Treater | VIC 2 Setting | | 1/26/2009 |
| 35 | Piping | VIC 2 Setting | | 1/26/2009 |
| 36 | Piping and old equipment | VIC 2 Setting | | 3/2/2009 |
| 37 | TVIC Boot | TVIC Tank Farm | Lead & Asbestos per EHS 2.17 (example) | 4/29/2009 |
| 38 | TVIC Office & Sheds | TVIC | | 4/29/2009 |
| 39 | VIC 2 Gauge Tank | VIC 2 | Lead & Asbestos per EHS 2.17 (example) | 4/30/2009 |
| 40 | Gauge Tank | VIC 2 Setting | Lead & Asbestos per EHS 2.17 (example) | 5/1/2009 |
| 41 | Wash Tank | VIC 2 Setting | Lead & Asbestos per EHS 2.17 (example) | 5/1/2009 |
| 42 | VIC 2 Wash Tank #2 | VIC 2 | Lead & Asbestos per EHS 2.17 (example) | 5/1/2009 |
| 43 | VIC 2 Liquid Accum. | VIC 2 | Lead & Asbestos per EHS 2.17 (example) | 5/1/2009 |
| 44 | Mufflers and Coolers | North side gas plant | | 7/3/2009 |
| 45 | Transformer | West side Last Chance | | 12/1/2009 |

| Item # | Inventory Item | Location | Testing & Handling Requirements | Actual Removal Date |
|--------|---------------------------------|-------------------------|--|---------------------|
| 46 | Piping | LAI Creek | | 12/1/2009 |
| 47 | Piping and Pads | North of Lai 5k | | 12/1/2009 |
| 48 | Transformers and Pad | North side of N Biofarm | | 12/1/2009 |
| 49 | Gauging Tank | VIC 1-12 Setting | Lead & Asbestos per EHS 2.17 (example) | 12/1/2009 |
| 50 | Gas Plant Mufflers | Old Yard | | 12/1/2009 |
| 51 | Old Sand Dumps | Old Yard | | 12/1/2009 |
| 52 | Baker Trailer | North of Water Plant | | 12/7/2009 |
| 53 | Black Car | North of Water Plant | | 12/7/2009 |
| 54 | Seal Water Tank | Central Flood | | 12/7/2009 |
| 55 | Gauging Tank | BC-15 Setting | Lead & Asbestos per EHS 2.17 (example) | 12/7/2009 |
| 56 | Shed | Next to Rubel 30 | | 12/7/2009 |
| 57 | Shed | Next to VIC 1-125 | | 12/7/2009 |
| 58 | Separator | BC-15 Setting | | 12/15/2009 |
| 59 | Equipment | BC-632 | | 12/15/2009 |
| 60 | Electrical Equipment | South of Johnson 10k | | 12/15/2009 |
| 61 | Heater | West of Lai Com 1-2178 | | 12/15/2009 |
| 62 | Green Vessel | West of Lai Com 1-2178 | | 12/15/2009 |
| 63 | Mixing Tub | By Acid Tanks | | 12/15/2009 |
| 64 | Small White Tank | South of Lai Pits | | 12/15/2009 |
| 65 | Wash Tank 1 | Stocker | | 2/15/2012 |
| 66 | Wash Tank 2 | Stocker | | 2/15/2012 |
| 67 | Gauge Tank 1 | West of Fairfax Ave. | | 6/15/2012 |
| 68 | Gauge Tank 2 | West of Fairfax Ave. | | 6/15/2012 |
| 69 | Vickers 2 Wash Tank | Near West LA College | | 12/1/2013 |
| 70 | Sludge Process Tank 1 | Vickers No 1 Lease | Contractor owned; moved offsite | June 11.2021 |
| 71 | Sludge Process Tank 2 | Vickers No 1 Lease | Contractor owned; moved offsite | June 11.2021 |
| 72 | Sludge Process Tank 3 | Vickers No 1 Lease | Contractor owned; moved offsite | June 11.2021 |
| 73 | Sludge Process Tank 4 | Vickers No 1 Lease | Contractor owned; moved offsite | June 11.2021 |
| 74 | Sludge Process Tank 5 | Vickers No 1 Lease | Contractor owned; moved offsite | June 11.2021 |
| 75 | Sludge Process Tank 6 | Vickers No 1 Lease | Contractor owned; moved offsite | June 11.2021 |
| 76 | Sludge Process Tank 7 | Vickers No 1 Lease | Contractor owned; moved offsite | June 11.2021 |
| 77 | Sharpensburg Tank | Vickers No 1 Lease | Lead and Asbestos per EHS 2.17 (5/17/21) | June 24, 2021 |
| 78 | Vickers Wastewater Tank | Vickers No 1 Lease | Lead and Asbestos per EHS 2.17 (5/17/21) | July 1, 2021 |
| 79 | Danby Lloyd Wastewater Tank | Dabney-Lloyd Lease | Lead and Asbestos per EHS 2.17 (8/3/22) | 8/6/2022 |
| 80 | Double-Wide Operations Trailer | LAI No. 1 Lease | Lead and Asbestos per EHS 2.17 (7/22/22) | 8/15/2022 |
| 81 | Gas Plant Operator's Shed | LAI No. 1 Lease | Lead and Asbestos per EHS 2.17 (7/22/22) | 8/16/2022 |
| 82 | Misc Mobile Office Trailer | LAI No. 1 Lease | Lead and Asbestos per EHS 2.17 (7/21/22) | 8/16/2022 |
| 83 | Main Office Middle Trailer | Stocker Fee Lease | Lead and Asbestos per EHS 2.17 (7/22/22) | 8/17/2022 |
| 84 | T-15 Johnson Tank, 10K BBL | LAI No. 1 Lease | Lead and Asbestos per EHS 2.17 (7/25/22) | 8/17/2022 |
| 85 | TVIC Operations Building | TVIC Lease | Lead and Asbestos per EHS 2.17 (7/21/22) | 8/18/2022 |
| 86 | LAI(A)-1 T-15 Wash Tank, 2K BBL | LAI No. 1 Lease | Lead and Asbestos per EHS 2.17 (8/3/22) | 8/29/2022 |

2.3 Equipment Storage and Removal Policies and Procedures

When equipment is identified for removal, it shall be handled and removed per existing SPR procedures for equipment handling and removal, as is evidenced by the summary for tank and equipment demolition and removal in Figure 2. Additionally, SPR will recycle all scrap metal from demolition and equipment removal projects and will maintain records indicating the total weight of scrap sold to offsite recycling centers.

Figure 2 –Demolition Testing and Handling Guidelines

Summary of Tank and Equipment Demolition Guidelines for Testing and Handling

1. Conduct asbestos and lead-based paint sampling
2. Test contents of all tank and equipment to verify they are non-hazardous prior to establishing disposal or recycling method.
3. For transformers, test for PCBs and handle appropriately.
4. If necessary, ensure demolition contractor submits AQMD 10 day notification with copy to SPR area EH&S Department.
5. Obtain estimate of quantity of Asbestos Containing Material (“ACM”) for disposal from demolition contractor to enable EH&S to order appropriate disposal containers.
6. Prior to commencement of demolition activities, address the following:
 - Conduct a pre-job safety meeting and complete Safe Work Permit. If any cutting (torch), chipping or grinding is performed, a Hot Work Permit is also required.
 - Certified ACM contractor required onsite for removal ACM in amounts >100 square feet. For ACM <100 square feet, contract personnel handling the ACM must complete minimum training requirements.
 - If lead based paint and asbestos are identified in quantities triggering OSHA action levels, appropriate respiratory protection will be worn.
 - If entry into tank is required, Permit Required Confined Space Entry procedures will be followed.
7. Upon completion of activities, EH&S to call Waste Transporter for proper disposal at Approved site. Ensure all manifest paperwork is completed properly and provide company copy to EH&S. For all scrap metal, haul to on site scrap metal staging area.

3 Conclusion

SPR has addressed the CSD and Settlement Agreement requirements for unused or abandoned equipment removal in this plan. All abandoned or unused equipment to date has been identified by SPR personnel, presented in the inventory, and a removal date for each of these unused or abandoned items has been implemented. Finally, procedures for removal have been included to illustrate that appropriate removal measures are being followed to ensure that equipment removal is carried out in a safe and environmentally friendly manner.