

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE (SPCC) PLAN

SENTINEL PEAK RESOURCES CALIFORNIA, LLC

INGLEWOOD PRODUCTION FACILITIES

(Revised July 2025)

**SENTINEL PEAK RESOURCES CALIFORNIA, LLC
INGLEWOOD PRODUCTION FACILITIES
5640 South Fairfax Avenue
Los Angeles, CA 90056**

Prepared by:
SCS Engineers
3900 Kilroy Airport Way, Suite 300
Long Beach, CA 90806
Phone: (562) 426-9544 Email: service@scsengineers.com

PROFESSIONAL ENGINEER CERTIFICATION

By means of this Professional Engineer Certification, I hereby attest, to the best of my knowledge and belief, to the following:

- I am familiar with the requirements of 40 CFR Part 112 and have verified that this Plan has been prepared in accordance with the requirements of this Part.
- I or my agent visited and examined the Sentinel Peak Resources California, IW (SPR) Inglewood Production Facilities (IW Facility) on May 15, 2025. My certification is based upon the condition of the IW Facility as of this date. Any material changes to the IW Facility made subsequent to this date must be separately reviewed, documented and P.E. certified as a Technical Amendment, as appropriate.
- I have verified that this Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards.
- I have verified that the required inspection and testing procedures have been established as described in this Plan.
- I have verified that the Plan is adequate for the IW Facility.
- My certification of this Plan in no way relieves the owner/operator of the IW Facility of their duty to prepare and fully implement the Plan in accordance with the requirements of 40 CFR Part 112. The attestations listed above are limited to only those facilities, programs, practices, and procedures pertaining to oil and oil products. I in no way assume any liability of whatsoever kind or nature by my certification.
- The owner/operator, by "Management Approval" located on the following page, acknowledges this certification and the compliance measures described herein.
- This certification is limited to the sections referenced in the Spill Prevention, Control, and Countermeasure Plan (40 CFR 112) cross reference.
- This Plan is valid only to the extent that the IW Facility Owner or Operator maintains, tests, and inspects equipment, containment, and other devices as prescribed in this Plan and completes any Implementation Requirements.

(Seal)



Registered Professional Engineer

A handwritten signature in blue ink that reads "Alissa Barrow".

Alissa Barrow, PE
State of California Registration No: C88186

Date of Seal/Signature: July 22, 2025

MANAGEMENT APPROVAL

Owner/Operator responsible for IW Facility: Sentinel Peak Resources California, LLC

IW Facility Name and Location: Inglewood Production Facilities

5640 South Fairfax Avenue, Los Angeles, CA 90056 (office)

By signature below, the Manager approves this Plan and acknowledges that the elements identified within this Plan have been implemented, including a commitment to expend money and resources to expeditiously control and cleanup oil spills.

This page may be used for the initial Management Approval or for subsequent change of management and/or change of designated person accountable.

This SPCC Plan will be implemented as herein described.

Designated person accountable for oil spill prevention at the IW Facility:

Signature: Joseph R. Walters

Name: Joseph Walters

Name: _____

Date: August 27, 2025

Title: _____

Title: Senior Environmental Specialist

Phone: (323) 298-2209

This SPCC Plan will be implemented as herein described.

Signature: James Bowen

Designated person accountable for oil spill prevention at the IW Facility:

Name: JAMES BOWEN

Name: James Bowen _____

Date: September 9, 2025

Title: Operations Superintendent _____

Title: OPERATIONS SUPERINTENDENT

This SPCC Plan will be implemented as herein described.

Signature: _____

Designated person accountable for oil spill prevention at the IW Facility:

Name: _____

Name: _____

Date: _____

Title: _____

Title: _____

LOG OF PLAN REVIEW AND AMENDMENTS

NON-TECHNICAL AMENDMENTS

Non-technical amendments are not certified by a Professional Engineer.

Examples of changes include, but are not limited to, phone numbers, name changes, or any non-technical text change(s).

TECHNICAL AMENDMENTS

Technical amendments are certified by a Professional Engineer.

Examples of changes include, but are not limited to, commissioning or decommissioning containers; replacement, reconstruction, or movement of containers; reconstruction, replacements, or installation of piping systems; construction or demolition that might alter secondary containment structures; changes or product or service; or revision of standard operation or maintenance procedures at a facility.

An amendment made under this section will be prepared within six (6) months of the change and implemented as soon as possible but not later than six (6) months following preparation of the amendment.

MANAGEMENT REVIEW

Management will review this SPCC Plan at least each five (5) years and document the review on the form below.

Review/ Amend Date	Signature	Amend Plan (will/will not)	Description of Review Amendment	Affected Page(s)	P.E. Certification (Y/N)
January 2017		Will	Addition of 5,000 Bbl tank to Packard Setting	Title Page, ii-iv, 1-1, 8-1, 8-2, 8- 6, field drawings Figure 1.3	Y
January 2017		Will	Company name change (non-technical)	Title page, iii, iv, 1-1, 1-2, 4-3, 8-21, 8-22, 8- 23	N
January 2017		Will	Add sections 1.7 and 4.6, update bulk storage inspection procedures for ConVault tank battery, update tank battery diagrams	Title Page, ii-v, 1-5, 4-1 through 4-4, tank battery diagrams section 8	Y
January 2017		Will	Update sections 4.4 and 8	Pages 4-3, 8-3 to 8-9, 8-43 to 8-51, 8-67, 8- 68, 8-70	Y

February 2020		Will	Re-certify SPCC Plan, update all sections and plot plans	Whole Plan	Y
July 2018		Will	Update management signature page	Page ii	Y
July 2018		Will	Remove section 8.2 Packard Drill Site and 8.3 San Vicente Drill Site	TOC, Pages 8-1, 8-2	Y
July 2018		Will	Remove Packard & San Vicente Drill Sites	Page 1-1	Y
July 2018		Will	Removed Packard Oil Site oil field operational equipment	Page 8-59	Y
July 2018		Will	Removed Packard Oil Site mobile portable containers and storage areas	Pages 8-60, 8-61	Y
July 2018		Will	Removed Packard Oil Site flow through process vessels	Pages 8-62, 8-64	Y
July 2018		Will	Removed San Vicente Drill Site flow through process vessels	Pages 8-65, 8-66	Y
July 2018		Will	Removed San Vicente Drill Site mobile portable containers and storage areas	Pages 8-67, 8-68	Y
July 2018		Will	Removed San Vicente Drill Site figure	Page 112	Y
July 2018		Will	Removed San Vicente Drill Site figure	Page 113	Y
July 2018		Will	Removed Packard Drill Site figure	Page 114	Y
July 2018		Will	Removed Packard Drill Site figure	Page 115	Y
July 2025		Will	Update entire plan and recertify	All	Y
July 2025		Will	Replace previous Tables with new Tables	Removed Pages 28 through 84	Y
July 2025		Will	Replace previous figures with new figure set	Removed Pages 90 through 101	Y

U.S. EPA SPILL PREVENTION CONTROL & COUNTERMEASURE

CFR 112.3,5,7,8,9,10

CROSS REFERENCE

40 CFR § 112	BRIEF DESCRIPTION	SECTION
112.3	Requirements for preparation and implementation of Spill Prevention Control and Countermeasure Plan	-----
(a, b, c)	Owners or operators ... and could reasonably be expected to have a discharge oil as described...must prepare and implement a Plan...	§1.5
(d)	A licensed Professional Engineer must review and certify a Plan for it to be effective...	PE Certification Page
(e)	Maintain a complete copy of the Plan at the facility if the facility is normally attended at least 4 hours per day, or at the nearest field office...	SPCC §1.3
112.5	Amendment of Spill Prevention Control and Countermeasures Plans by owners or operators	-----
(a)	Amend the SPCC ...when there is a change in facility design, construction, operation or maintenance which materially affects the facility's potential for the discharge of oil...	SPCC §1.4
(b)	...complete a review and evaluation of the SPCC at least once every five years... amend the SPCC within six months of the review...implement within six months of preparation of any amendment.	SPCC §1.4
(c)	Have a Professional Engineer certify any technical amendment...	SPCC §1.4
112.7	Guidelines for the preparation and implementation of a Spill Prevention Control and Countermeasures Plan	-----
-----	...must prepare a Plan...have full approval of management...in writing.	Management Approval Page, Entire Plan
-----	If the plan calls for additional facilities or procedures, methods, or equipment not yet fully operational, these items should be discussed in separate paragraphs, and the details of installation and operational start-up should be explained separately.	-----
-----	...follow the sequence specified (or cross-reference)...	ICP App. A
(a)(2)	Comply with all applicable requirements in this part... [or] state reasons for non-conformance ... and describe alternate methods...	-----
(a)(3)	Describe ... physical layout ... and include diagram	SPCC § Facility Specific Data, Fig. LAS-B-103
(a)(3)(i)	... [address in your Plan] .. the type of oil in each container and its ... capacity ...	SPCC §8.0
(a)(3)(ii)	... discharge prevention measures including routine handling of products ...	SPCC § 4.2
(a)(3)(iii)	...Drainage or discharge controls ... and procedures for control of a discharge ...	SPCC § 3.0
(a)(3)(iv)	Countermeasures for discharge discovery, response, and cleanup (both ... facility's ... and contractor)	SPCC § 1.7
(a)(3)(v)	Methods of disposal of recovered materials ...	SPCC § 1.7
(a)(3)(vi)	Contact list and phone numbers ...	SPCC § iii
(a)(4)	Relate information ... [on a discharge] ...	Fig. 2.3
(a)(5)	Organize portions of the Plan ... that will make them readily usable....	Section Dividers
(b)	Where experience indicates a reasonable potential for equipment failure..., include in your Plan a prediction of the direction, rate of flow, and total quantity of oil...	SPCC § 8.0
(c)(1)	Onshore facilities.	-----
(c)(1)(i)	Dikes, berms or retaining walls sufficiently impervious to contain spilled oil	SPCC § 3.1
(c)(1)(ii)	Curbing	SPCC § 3.1
(c)(1)(iii)	Sumps and Collection systems	SPCC § 3.1
(c)(1)(iv)	Culverting, gutters or other drainage systems	SPCC § 3.1
(c)(1)(v)	Weirs, booms or other barriers	SPCC § 3.1
(c)(1)(vi)	Spill diversion ponds	N/A
(c)(1)(vii)	Retention ponds	N/A

U.S. EPA SPILL PREVENTION CONTROL & COUNTERMEASURE

40 CFR 112.3,5,7,8,9,10 CROSS REFERENCE (Cont'd)

40 CFR § 112	BRIEF DESCRIPTION	SECTION
(c)(1)(viii)	Sorbent materials	N/A
(c)(2)	Offshore Facilities.	-----
(c)(2)(i)	Curbing, drip pans	N/A
(c)(2)(ii)	Sumps and collection systems	N/A
(d)	If you determine that the installation of structures or equipment listed in paragraphs (c) and (h)(1) of this section...is not practicable...clearly explain in your Plan...and provide...	-----
(d)(1)	<i>A strong oil spill contingency plan following...40 CFR 109.</i>	Entire Plan
(d)(2)	A written commitment of manpower, equipment and materials required to expeditiously control and remove any harmful quantity of oil discharged.	Management Approval
(e)	<i>Inspections and records</i>	-----
	...in accordance with written procedures that you or the certifying engineer develop...with the SPCC Plan for a period of three years.	SPCC § 1.4
(f)	<i>Personnel, training and spill prevention procedures</i>	-----
(f)(1)	...train your oil-handling personnel in the operation and maintenance of equipment to prevent the discharges...	SPCC § 2.1
(f)(2)	Designate a person...accountable for oil spill prevention...	Management Approval
(f)(3)	Schedule and conduct spill prevention briefings...highlight and describe known spill discharges...or failures, malfunctioning components, and recently developed precautionary measures.	SPCC § 2.1
(g)	<i>Security (excluding oil production facilities)</i>	N/A
(h)	<i>Facility tank car and tank truck loading/unloading rack</i>	-----
(h)(1)	Where loading/unloading rack drainage does not flow into a catchment basin or treatment facility designed to handle discharges, use a quick drainage system... ..design any containment system to hold at least maximum capacity of any single compartment of a tank car or tank truck loaded or unloaded at the facility.	SPCC § 6.0
(h)(2)	Provide an interlocked warning light or physical barrier system, warning signs, wheel chocks, or vehicle break to prevent vehicular departure before complete disconnect of flexible or fixed oil transfer lines.	SPCC § 6.0
(h)(3)	Prior to filling and departure of any tank car or tank truck, closely inspect for discharges the lowermost drain and all outlets of such vehicles should be closely examined for leakage, and if necessary, that they are tightened, adjusted, or replaced to prevent liquid leakage while in transit.	SPCC § 6.0
(i)	If a field-constructed aboveground container undergoes a repair, alteration, reconstruction, or change in service that might affect the risk of a discharge or failure due to brittle fracture...evaluate the container for risk...	SPCC § 4.1
(j)	In addition...include a complete discussion of conformance with applicable requirements...or any more stringent, with State rules, regulations and guidelines.	SPCC § 1.6
(k)	Qualified Oil-filled Operation Equipment	-----
(k)(1)	Qualification Criteria – Reportable Discharge History: The owner or operator...that has had no discharges as described in § 112.1(b) from any oil-filled operational equipment...; and	N/A
(k)(2)	Alternative Requirements to General Secondary Containment. If secondary containment is not provided for qualified oil-filled operational equipment pursuant to paragraph (c) of this section, the owner or operator of a facility with qualified oil-filled operational equipment must:	N/A
(k)(2)(i)	Establish and document the facility procedures for inspections or a monitoring program to detect equipment failure and/or a discharge; and	N/A
(k)(2)(ii)	Unless you have submitted a response plan under § 112.20, provide in your Plan the following:	N/A

U.S. EPA SPILL PREVENTION CONTROL & COUNTERMEASURE

40 CFR § 112	BRIEF DESCRIPTION	SECTION
(k)(2)(ii)(A)	An oil spill contingency plan following the provisions of part 109 of this chapter,	N/A
(k)(2)(ii)(B)	A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.	N/A
112.8	<i>Onshore Oil facilities (excluding production facilities)</i>	-----
(c)	<i>Bulk Storage Facilities</i>	SPCC - §4.1
112.9	<i>Onshore Oil production facilities</i>	-----
(a)	Meet the general requirements...under §112.7...	SPCC Certification Page,
(b)(1)	At tank batteries and separation and treating areas where there is a reasonable possibility of a discharge...close and seal at all times drains of dikes except when draining uncontaminated rainwater. Prior to drainage, you must inspect the diked area as provided in §112.8(c)(3)(ii),(iii), and (iv). You must remove accumulated oil on the rainwater and return it to storage or disposed of in accordance with legally approved methods.	SPCC - §3.1
(b)(2)	Inspect field drainage systems (such as drainage ditches or road ditches), and oil traps, sumps or skimmers...	SPCC - §3.2
(c)	<i>Oil production facility bulk storage containers</i>	-----
(c)(1)	Not use a container for the storage of oil unless its material and construction are compatible with the material stored and the conditions of storage.	SPCC - §4.1
(c)(2)	Except as described...flow-through process vessels...produced water containers and any associated piping and appurtenances downstream from the container, construct all tank battery, separation, and treating facility installations, so that you provide...sufficient freeboard to contain precipitation. You must safely confine drainage from undiked areas in a catchment basin or holding pond.	SPCC - §4.6
(c)(3)	Periodically and upon a regular schedule visually inspect each container of oil for deterioration and maintenance needs, including the foundation and support of each container that is on or above the surface of the ground.	SPCC - §4.7
(c)(4)	Engineer or update new and old tank battery installations in accordance with good engineering practice to prevent discharges. You must provide at least one of the following:	-----
(c)(4)(i)	Container capacity adequate to ensure that a container will not overfill if a pumper/gauger is delayed in making regularly scheduled rounds.	SPCC - §4.1
(c)(4)(ii)	Overflow equalizing lines between containers so that a full container can overflow to an adjacent container.	SPCC - §4.1
(c)(4)(iii)	Vacuum protection adequate to prevent container collapse during a pipeline run or other transfer of oil from the container.	SPCC - §4.1
(c)(4)(iv)	High level sensors to generate and transmit an alarm signal to the computer where the facility is subject to a computer production control system.	SPCC - §4.1
(c)(5)	Flow-through process vessels...alternate requirements...	SPCC - §4.6
(c)(5)(i)	Periodically and on a regular schedule visually inspect and/or test flow-through process vessels...	SPCC - §4.7
(c)(5)(ii)	Take corrective action or make repairs to flow-through process vessels and any associated components as indicated by... inspections, tests, or evidence of an oil discharge.	SPCC - §4.7
(c)(5)(iii)	Promptly remove ... any accumulations of oil discharges associated with flow-through process vessels.	SPCC - §4.6
(c)(5)(iv)	If your facility discharges... as described in §112.1(b)... from flow-through process vessels..., within six months from the time the facility becomes subject to this paragraph, ensure that all flow-through process vessels subject to this subpart comply with §112.9(c)(2) and (c)(3).	N/A
(c)(6)	<i>Produced water containers.</i> For each produced water container, comply with §112.9(c)(1) and (c)(4); and §112.9(c)(2) and (c)(3), or comply with the provisions of the following paragraphs (c)(6)(i) through (v):	SPCC - §4.1

U.S. EPA SPILL PREVENTION CONTROL & COUNTERMEASURE
40 CFR 112.3,5,7,8,9,10
CROSS REFERENCE (Cont'd)

40 CFR § 112	BRIEF DESCRIPTION	SECTION
(c)(6)(i)	Implement... a procedure for each produced water container that is designed to separate the free-phase oil that accumulates on the surface of the produced water. Include... a description of the procedures, frequency, amount of free-phase oil expected to be maintained inside the container, and a Professional Engineer certification in accordance with §112.3(d)(1)(vi). Records kept under... business practices will suffice... If this procedure is not implemented as described... must comply with §112.9(c)(2) and (c)(3).	SPCC - §4.1
(c)(6)(ii)	On a regular schedule, visually inspect and/or test the produced water container and associated piping for leaks, corrosion, or other conditions that could lead to a discharge as described in §112.1(b) in accordance with good engineering practice.	SPCC - §4.1
(c)(6)(iii)	Take corrective action or make repairs to the produced water container and any associated piping as indicated by regularly scheduled visual inspections, tests, or evidence of an oil discharge.	SPCC - §4.1
(c)(6)(iv)	Promptly remove or initiate actions to stabilize and remediate any accumulations of oil discharges associated with the produced water container.	SPCC - §4.1
(c)(6)(v)	If your facility discharges... as described in §112.1(b)... from a produced water container..., within six months from the time the facility becomes subject to this paragraph, ensure that all produced water containers subject to this subpart comply with §112.9(c)(2) and (c)(3).	N/A
(d)	Install a blowout prevention (BOP) assembly and well control system before drilling below any casing string or during workover operations. The BOP assembly and well control system must be capable of controlling any well-head pressure that may be encountered while that BOP assembly and well control system are on the well.	SPCC - §5.4
(d)(1)	Periodically and upon a regular schedule inspect all aboveground valves and piping associated with transfer operations for the general condition of flange joints, valve glands and bodies, drip pans, pipe supports, pumping well polish rod stuffing boxes, bleeder and gauge valves, and other such items.	SPCC - §5.3
(d)(2)	Inspect saltwater (oil field brine) disposal facilities often, particularly following a sudden change in atmospheric temperature, to detect possible system upsets capable of causing a discharge.	N/A
(d)(3)	For flowlines and intra-facility gathering lines that are not provided with secondary containment in accordance with §112.7(c), unless you have submitted a response plan under §112.20, provide in your Plan the following:	----
(d)(3)(i)	An oil spill contingency plan following the provisions of part 109 of this chapter.	ICP
(d)(3)(ii)	A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that might be harmful.	----
(d)(4)	Prepare and implement a written program of flowline/intra-facility gathering line maintenance. The maintenance program must address your procedures to:	SPCC § 5.3
(d)(4)(i)	Ensure that flowlines and intra-facility gathering lines and associated valves and equipment are compatible with the type of production fluids, their potential corrosivity, volume, and pressure, and other conditions expected in the operational environment.	SPCC § 5.3

U.S. EPA SPILL PREVENTION CONTROL & COUNTERMEASURE

40 CFR 112.3,5,7,8,9,10

40 CFR § 112	BRIEF DESCRIPTION	SECTION
112.10	Onshore Oil production facilities	-----
(a)	Meet the general requirements listed under §112.7, and also meet the specific discharge prevention and containment procedures listed under this section.	SPCC § 5.4, 5.7
(b)	Position or locate mobile drilling or workover equipment so as to prevent a discharge as described in §112.1(b).	SPCC § 5.4, 5.7
(c)	Provide catchment basins or diversion structures to intercept and contain discharges of fuel, crude oil, or oily drilling fluids.	SPCC § 5.4, 5.7
(d)	Install a blowout prevention (BOP) assembly and well control system before drilling below any casing string or during workover operations. The BOP assembly and well control system must be capable of controlling any well-head pressure that	SPCC § 5.4, 5.7

SPILL PREVENTION, CONTROL, AND COUNTERMEASURES PLAN

TABLE OF CONTENTS

	<u>Page</u>
Foreword	
Title Page	SPCC - i
Professional Engineer Certification	SPCC - ii
Management Approval	SPCC - iii
Log of Plan Review and Amendments	SPCC - iv
U.S. EPA Spill Prevention Control & Countermeasure	SPCC - vii
1.0 Introduction and Plan Content	1.1
1.1 Introduction.....	1.1
1.1.1 Plan Integration	1.2
1.2 Plan Purpose/Objectives	1.2
1.3 Plan Distribution Procedures.....	1.2
1.4 Plan Review and Update Procedures	1.3
1.4.1 IW Facility Changes requiring Plan Revision.....	1.3
1.4.2 Five-Year Review	1.3
1.4.3 Certification of Revisions.....	1.3
1.4.4 Inclusion of Amendments into the Plan	1.4
1.5 Regulatory Compliance	1.4
1.5.1 General Applicability	1.4
1.5.2 Submission of Spill Documentation.....	1.5
1.6 Conformance with More Stringent State Rules, Regulations and Guidelines.....	1.5
1.7 Discharge Response and Spill Reporting	1.6
2.0 Training and Inspections	2.2
2.1 Personnel, Training and Spill Prevention Procedures	2.2
2.2 Inspections and Records.....	2.2
3.0 Facility Drainage	3.1
3.1 Diked Storage Area Drainage	3.1
3.2 Undiked Area Drainage	3.1
3.3 Stormwater Drainage Procedures	3.1
4.0 Bulk Storage Containers	4.1
4.1 Container Design and Construction	4.1
4.2 Secondary Containment.....	4.1
4.3 Completely and Partially Buried Metallic Storage Tanks	4.2
4.4 Mobile or Portable Oil Storage Tanks	4.2
4.5 Internal Heating Coils	4.2
4.6 Flow-Through Process Vessels and Produced Water Containers.....	4.2
4.7 Container Inspection Programs.....	4.2
4.8 Corrosion Prevention or Corrosion Monitoring Techniques Utilized	4.3
5.0 Transfer Operations, Pumping, and In-Terminal Process	5.1

5.1	Aboveground Valves and Piping Installations	5.1
5.2	Buried Piping Installations.....	5.1
5.3	Out-Of-Service Pipelines	5.2
5.4	Produced Water Storage Facilities	5.2
5.5	Flowline Maintenance	5.2
5.6	Drilling and Workover Facilities.....	5.2
5.7	Vehicle Warning Procedures	5.3
6.0	Tank Car and Tank Truck Loading/Unloading Rack	6.1
7.0	Security	7.1
8.0	Facility Specific Data	8.1

OTHER SPCC DATA

Figures 1 through 12

Master Tank Table

ICP Notification and Spill Response Procedures

ICP-A Regulatory Cross References

ICP-K Miscellaneous Forms

ICP-L Glossary of Terms and Acronyms

1.0 INTRODUCTION AND PLAN CONTENT

1.1 INTRODUCTION

This Spill Prevention, Control, and Countermeasures (SPCC) Plan has been developed in accordance with the regulatory requirements of 40 CFR Part 112 (EPA) for Sentinel Peak Resources California, IW (SPR) Inglewood Production Facilities, (hereinafter referred to as “IW Facility”). **Section 8.0** of this Plan details the IW Facility-specific information including information on potential spill sources, containment areas, and facility diagrams.

The IW Facility has the following general operating and design characteristics:

- Onshore oil production with oil dehydration/separation and oil storage/pipeline facilities.
- Water Treatment and injection facilities.
- Natural gas separation facilities and storage/handling of natural gas liquids.
- Total crude oil and produced water storage capacity of approximately 180,000 barrels, in:
 - 42 storage tanks ranging in size from 100 to 10,000 barrels (4,200 to 420,000 gallons).
 - 14 storage tanks ranging in size from four (4) to 48 barrels (168 to 2,016 gallons).
 - Six (6) electrical substations ranging in size from 13 to 23 barrels (546 to 966 gallons).
- Nearest potential receiving water from a spill is the Ballona Creek (varies from 2,000 feet northwest to 1.85 miles west), via County of Los Angeles Flood Control’s storm drain system.
- Petroleum products handled at the IW facility are listed in the master tank table and include:
 - Crude oil/produced water mixture
 - Crude oil (dehydrated)
 - Wastewater (produced water)
 - Natural gas liquids
 - Crude oil/produced water treating chemicals
 - Gasoline and Diesel (fuel for IW facility vehicles)
 - Electrical substations

The focus of the SPCC Plan is on spill prevention, control, and countermeasures. In the event of an actual spill event, the IW Facility will implement the “Integrated Contingency Plan” (ICP) which was prepared in accordance with the Oil Pollution Act of 1990. The ICP provides details on notification procedures, response actions, resource documentation, identification of environmental sensitivities, and other pertinent spill response issues.

1.1.1 Plan Integration

This SPCC Plan is integrated into the IW Facility's Integrated Contingency Plan (ICP) as a separate section tabbed "SPCC Plan". The integrated documents have been streamlined to maximize their usefulness in the event of an emergency response, as well as for training and regulatory compliance. Specific references are made in this SPCC Plan to certain sections, figures, and appendices of the ICP for data that provides a primarily response-oriented function (IW Facility diagrams, summary IW Facility information, notification data, etc.) or to consolidate certain supporting appendices (regulatory cross-references, documentation forms, glossary/acronyms, etc.). Specific references are made from the ICP into certain sections and figures of this SPCC Plan for data that provides primarily spill prevention, control and countermeasures information (discharge detection methods, containment and drainage detail, hazard identification tank tables, security, etc.).

1.2 PLAN PURPOSE/OBJECTIVES

This SPCC Plan is intended to provide a ready reference and guide to assist IW Facility personnel in establishing and maintaining an efficient and effective prevention, control, and countermeasures program for potential discharge incidents from the IW Facility.

The specific objectives of the Plan are to define the typical Sentinel Peak Resources California, LLC (SPR) and specific IW Facility spill prevention, control, and countermeasures practices and procedures including:

- Designated person accountable for oil spill prevention.
- Training and Inspection Programs
- Facility Drainage.
- Bulk Storage Tanks.
- Transfer Operations, Pumping, and In-Plant Processes.

1.3 PLAN DISTRIBUTION PROCEDURES

The Regulatory Compliance Department (RCD) of SPR will coordinate the distribution of the Plan. Distribution will be handled in the following manner:

The Plan is maintained as a section of the ICP. Distribution is controlled by the number on the cover page of the ICP. A distribution list is included in the Foreword of the ICP to facilitate control and to identify the current holders of the Plan.

Stand-alone copies of the SPCC Plan (separate from the ICP) may from time to time be distributed. The Compliance Department will control such distribution.

The IW Facility shall maintain a complete copy of the Plan at the IW Facility since it is normally attended twenty four (24) hours per day. The Plan will be available to the EPA Regional Administrator for onsite review during normal working hours.

1.4 PLAN REVIEW AND UPDATE PROCEDURES

The "Designated Person Accountable for Oil Spill Prevention" (identified on the management Approval page in the Foreword) with support from RCD will coordinate the following plan review and update procedures.

1.4.1 IW Facility Changes requiring Plan Revision

This Plan will be revised when there are changes in the IW Facility's design, construction, operation, or maintenance that materially affects the IW Facility's potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shorelines. An amendment made under this section must be prepared within six (6) months. Such amendments shall be fully implemented as soon as possible, but not later than six (6) months following preparation of the amendment.

Changes requiring revision may include, but are not limited to:

- Commission or decommission of bulk storage containers/tanks.
- Replacement, reconstruction, or movement of bulk storage containers/tanks.
- Reconstruction, replacement, or installation of piping systems.
- Construction or demolition that might alter secondary containment structures and/or drainage systems.
- Revision of standard operating or maintenance procedures at the IW Facility.

1.4.2 Five-Year Review

At least once every five (5) years the IW Facility will complete a review and evaluation of this SPCC Plan and make amendments within six (6) months of the review and implement amendments, as soon as possible, but not later than six (6) months following preparation of any amendment. This review will include at a minimum a review of the following:

- Applicability of new prevention and control technology, which may significantly reduce the likelihood of a spill event from the IW Facility if such technology has been field-proven at the time of the review.
- Accuracy of the SPCC Plan as compared to the current IW Facility operation and SPCC Regulations.
- Capacity and structural integrity of secondary containment structures.
- SPCC inspections and records retention to ensure continuity for a minimum period of three (3) years.

1.4.3 Certification of Revisions

Amendments which could materially affect the facility's potential for discharge into navigable waters of the United States or adjoining shorelines, except for changes to personnel and telephone references, must be certified by a Registered Professional Engineer to satisfy the requirements of 40 CFR Part 112 (see the Certification Page).

1.4.4 Inclusion of Amendments into the Plan

RCD will coordinate the word processing, publication, and distribution efforts of completing the revisions and maintaining the Plan.

The plan holder, immediately upon receipt of any revisions, shall review and insert the revised pages into the Plan and discard the obsolete pages. This action should then be recorded on the "Revision Record" page in the Foreword.

Plan review opportunities may occur during:

- Spill Management Team Tabletop Exercises
- Actual emergency responses

1.5 REGULATORY COMPLIANCE

This plan addresses the following regulatory requirements:

Federal Spill Prevention, Control, and Countermeasures Regulations: U.S. EPA Final Rule for Oil Pollution Prevention; Non-Transportation Related On-shore and Offshore Facilities (40 CFR Part 112 - as amended October 14, 2010).

A detailed cross reference between the format of this Plan and that of the applicable regulations is provided prior to the Table of Contents for this document.

1.5.1 General Applicability

This requirement applies to owners or operators of non-transportation-related onshore and offshore facilities engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing or consuming oil and oil products, and that meet each of the following criteria:

- Due to their location, could reasonably be expected to discharge oil in harmful quantities into or upon the navigable waters of the United States or adjoining shorelines and;
- An aboveground storage capacity in excess of 1,320 gallons, excluding any containers less than 55 gallons or;
- Has an underground storage capacity in excess of 42,000 gallons, and not covered by the technical requirements of 40 CFR Part 280 or 281 [UST regulations].

1.5.2 Submission of Spill Documentation

The IW Facility shall submit the documentation as required in 40 CFR Part 112 to the EPA Regional Administrator within sixty (60) days whenever the IW Facility has a discharge event(s) which meets one of the following conditions:

- Discharge more than 1,000 gallons of oil (or oil products) into or upon the navigable waters of the United States or adjoining shorelines in a single spill event or,
- Discharges more than 42 gallons of oil (or oil products) into the navigable waters of the United States in two (2) spill events within any 12-month period.

The following spills and releases have previously been reported to the appropriate California agencies such as: California Office of Emergency Services (OES); California Geologic Energy Management (CalGEM); and the Los Angeles Regional Water Quality Control Board (RWQCB).

- April 1, 2019 – Block 31 line leak released less than 0.5 barrels of crude oil and 11 barrels of produced water. Completed cleanup of affected curb/gutters and storm drain system.
- March 27, 2020 - BC Line 358 line leak released less than seven barrels of treated produced water. Completed cleanup of affected curb/gutter. The release did not enter the storm drain system.

In the event of a spill or release, documentation to be included with this Plan submission includes the following:

- Name of the facility;
- Name(s) of the owner or operator of the facility;
- Location of the facility;
- Maximum storage or handling capacity of the facility and normal daily throughput;
- Corrective action and countermeasure taken, including a description of equipment repairs and replacements.
- An adequate description of the facility; including maps, flow diagrams, and topographical maps, as necessary;
- The cause(s) of such spill, including a failure analysis of system or sub-system in which the failure occurred;
- Additional preventive measure taken or contemplated to minimize the possibility of recurrence;
- Such other information as the Regional Administrator may reasonably require pertinent to the Plan or spill event.

1.6 CONFORMANCE WITH MORE STRINGENT STATE RULES, REGULATIONS AND GUIDELINES

CA Code Title 14, Division 1, Subdivision 4, Chapter 3, Subchapter 3 - Oil Spill Contingency Plans.

1.7 DISCHARGE RESPONSE AND SPILL REPORTING

All information for discharge response and spill reporting is incorporated in the ICP under the following documents (provided at the end of this report).

- Disposal Methods of Recovered Materials (112.7(a)(3) – Appendix F, Disposal Plan;
- Discharge Response Contact Information (112.7(a) 3vi) – Section 1, Notification Procedures;
- Spill Reporting Information Plan (112.7(a)4) – Section 1, Notification Procedures;
- Discharge Response Procedures (112.7(a)5) – Section 3, Response Procedures

2.0 TRAINING AND INSPECTIONS

2.1 PERSONNEL, TRAINING AND SPILL PREVENTION PROCEDURES

Personnel training and spill prevention procedures are in place at the IW Facility and include the following:

- Maintenance and operating personnel are instructed in the proper operation and maintenance of the IW Facility's discharge prevention equipment. New operating personnel receive on the job training until they are capable of demonstrating working knowledge of the proper operation and maintenance of the IW Facility's equipment.
- The company has a continuing program of informing operating personnel of the laws and regulations that concern pollution prevention, control, and countermeasures. Personnel are kept informed of their obligation to prevent pollution incidents during annual training sessions and regularly scheduled safety meetings.
- These briefings include a review of this SPCC Plan, spill incidents, the proper operation and maintenance of pollution control equipment and any newly developed spill control methods.
- Operating personnel attend annual (at a minimum) prevention briefings which are held at the IW Facility, or, at another designated Company location.
- Inspections of the prevention systems, or their equivalents, are conducted according to the procedures set forth in the checklists (sample in Appendix K of the ICP).
- Pertinent safety meetings, spill prevention briefings, and training sessions are documented. These training records are retained on file (electronic and/or paper media) at the IW Facility's Inglewood Office for a minimum period of three (3) years. Sample documentation forms are provided in Appendix K of the ICP.

2.2 INSPECTIONS AND RECORDS

IW Facility inspection and record keeping requirements are detailed throughout this Plan. Generally, the IW Facility has developed and documented the following programs:

- IW Facility personnel conduct hourly inspections or observations of the facilities where there is a potential for spills (wellheads, well cellar, flow lines, gathering systems, well test stations, traps, drain pits, process equipment) during operating personnel rounds. Such inspections/observations are not recorded unless abnormal conditions are noted.
- Daily visual inspections (including the items listed above) are performed during operating personnel rounds. The daily inspection checklists/reports are maintained at the IW facility.
- Records of the inspections are maintained on file at the IW Facility's Inglewood Office for a minimum period of three (3) years.
- Sample inspection forms are located in Appendix K of the ICP.

3.0 FACILITY DRAINAGE

A portion of the potential spill sources are located within diked storage areas. Other spill sources are situated such that drainage is directed toward retaining basins strategically located throughout the IW production field, primarily along the western boundary of the site.

3.1 DIKED STORAGE AREA DRAINAGE

Drainage of stormwater or other liquids accumulated within the IW Facility's diked storage area is controlled as follows:

- The preferred method for removal of accumulated stormwater is by natural dissipation providing that the accumulation does not damage the equipment/ structures or inhibit operations conducted within the containment area. The secondary containment dike does not contain penetrations or valves.
- If necessary, stormwater which does accumulate within the diked area, and does not dissipate naturally, is drained or pumped out in accordance with the stormwater drainage procedures.
- Dike wall drain valves are secured in the closed position with lock or seal when not in use. Valves used for the drainage of diked areas are manual open-and-close type valves. Flapper type drain valves are not used.
- Hydrocarbon spills would be recovered by vacuum truck or other appropriate means.
- Water which accumulates in diked areas is visually inspected for product and discharged only if no product sheen is visible.

3.2 UNDIKED AREA DRAINAGE

Drainage from undiked areas is controlled as follows:

- The undiked process areas are visually inspected during hourly operating personnel rounds.
- Stormwater runoff from areas that could experience releases is directed toward retention ponds where it can be controlled.
- Secondary containment for gathering and flowlines is not practicable.
- Stormwater run-off from other undiked areas in the IW Facility is not controlled due to its origination from non-spill potential areas.
- In the event of a spill or discharge, the ICP will be implemented, and actions to contain and remove the spilled liquids will commence immediately upon discovery.

3.3 STORMWATER DRAINAGE PROCEDURES

Containment Area Drainage Procedures consist of:

- **Primary:** Natural dissipation of stormwater. The accumulation, however, will not be allowed to significantly impact containment capacity or the operations of facilities within the containment area.
- **Secondary:** Removal of stormwater by drainage through the containment area (butterfly or block valves) or by manual pumps after the water has successfully passed a visual inspection for contamination. Uncontaminated stormwater is released in accordance with NPDES permit requirements.
- **Emergency Conditions Only:** Drainage of oil impacted liquids will be handled with vacuum trucks, pumps, or other means. Oil impacted liquids will not be released to an open water course.
- Sample drainage procedures, reports and checklists are found in Appendix K of the ICP. Drainage records are retained at the IW Facility for a minimum period of three (3) years.

4.0 BULK STORAGE CONTAINERS

4.1 CONTAINER DESIGN AND CONSTRUCTION

The IW Facility's bulk oil and oil products storage tanks have the following design characteristics, materials of construction, and fail-safe engineering features:

- Containers/tanks are constructed of steel, a material that is compatible with the oil and oil products stored and the conditions of storage (including pressure and temperature).
- Containers/tanks are constructed of welded, bolted, and riveted steel in accordance with API Standards.
- Containers/tanks are operated within "Safe Fill" levels, which are located below the operating limits of each tank.
- Containers/tanks are provided with adequate pressure/vacuum relief.
- The container/tanks are equipped with ground-level sight gauges and are hand-gauged at regular intervals to confirm sight gauge accuracy.
- Containers/tanks used for critical transfer operations have high liquid level alarm lights, readily visible to the operators making their rounds.
- Containers/tanks used for critical transfer operations are protected from overfill by start/stop level actuated pump controls, including alarm lights to indicate pump failure.
- Tanks and certain buried appurtenances are cathodically protected, as necessary. Tanks are bonded and grounded.
- Containers/tanks and liquid level sensing devices are inspected on a monthly basis using a facility specific "Safeties" inspection form.
- Visible oil leaks which result in a loss of oil from tank seams, gaskets, rivets and bolts sufficiently large to cause the accumulation of oil in diked areas are promptly corrected.
- Fuels and lubricants in aboveground tanks are considered AST Category 1 subject to the release detection method and tank spill controls of the AST Inspection Standard, STI SP001.

4.2 SECONDARY CONTAINMENT

IW Facility bulk oil and oil product storage containers are situated within secondary containment areas, designed as follows:

- Bulk storage container installations are constructed so that a secondary means of containment is provided either by dikes/walls, retention ponds, or a combination of the two.
- The containment basins have T-skimmers designed to contain stormwater and release it via underflow, thus containing any surface oil within the basin.
- The containment areas are designed to contain the entire contents of the largest single tank plus sufficient freeboard to allow for precipitation.
- Containment berms are sufficiently impervious to contain spills.

- Based on soils characteristics, containment areas have some vertical permeability that may preclude a spill from being completely cleaned up before permeating the ground. However, containment areas are capable of maintaining a discharge within the boundaries of the IW Facility provided that a discharge is timely detected and clean up operations begin immediately after discovery of the discharge.
- The IW Facility has a strong tank integrity program which significantly increases the chances of detecting corrosion or anomalies in the tank shell before it becomes compromised (See **Section 4.7** for details).
- Additional details on secondary containment are provided in Section 8 of this Plan.

4.3 COMPLETELY AND PARTIALLY BURIED METALLIC STORAGE TANKS

There are no underground or partially buried metallic storage tanks.

4.4 MOBILE OR PORTABLE OIL STORAGE TANKS

At the time of the most recent update of this plan, mobile/portable oil storage tanks were not in use at the IW facility. If in the future mobile or portable tanks are utilized, the following protocols are in place:

- Mobile and portable storage tanks may be brought on-site during various operations. These portable tanks will be positioned or located so as to prevent spilled oil from reaching navigable waters.
- A secondary means of containment, such as dikes, curbing, sumps or containment basins located throughout the IW Facility will be furnished for the largest single compartment or container with sufficient freeboard to contain precipitation.
- Mobile tanks will be located where they will not be subject to periodic flooding or washout.

4.5 INTERNAL HEATING COILS

- Internal heating coils are neither installed nor utilized in the operations of the IW Facility.

4.6 FLOW-THROUGH PROCESS VESSELS AND PRODUCED WATER CONTAINERS

Flow-through process vessels and produced water containers are identified in **Section 8**. Releases from vessels not located in secondary containment would flow down gradient to the nearest retention basin. Additionally, flow-through process vessels are:

- Periodically, and on a regular schedule, visually inspected and/or tested including their associated components for leaks, corrosion, or other conditions that could lead to a discharge.
- Corrective actions and/or repairs are made to flow-through process vessels and associated components by regularly scheduled visual inspections, tests, or evidence of an oil discharge.

- Accumulations of oil discharges associated with flow-through vessels are promptly removed.
- A discharge of oil greater than 1,000 gallons of oil, or discharges of more than 42 gallons of oil in each of two discharges as described in 112.1 (b) within any twelve-month period from a flow-through process vessel will have secondary containment installed as described in 112.9(c)(2) and (c)(3).

4.7 CONTAINER INSPECTION PROGRAMS

The tank inspection programs conducted and maintained by IW Facility personnel are listed below. The master tank table attached at the end of this document details the individual tank inspection results.

- Aboveground tanks are inspected under the SPR LA Basin Tank inspection and Repair Program. Oil storage tanks have visual and ultrasonic testing performed in accordance with California AB-1960 (CCR Title 14, Div. 2, Chapter 4). Inspections are performed to, and inspectors are certified to, this industry standard.
- The outside of the tanks are visually inspected by operating personnel for signs of deterioration, leaks, or the accumulation of liquids inside the containment areas.
- Each storage tank is inspected per company policy, as required by age, condition, and service. The inspection record is retained for the useful life of the tank. This inspection consists of close scrutiny to the condition of 1) firewall, 2) foundation, 3) structure, 4) appurtenances, 5) paint, 6) internal coating whenever the tank is taken out of service (typically every 2-10 years). Pit inspections, ultrasound tests, and shell thickness measurements are conducted periodically. Internal ultrasound tests are performed on a 10-year cycle, while external ultrasound tests are conducted on a 5-year cycle. Cathodic protection systems are checked regularly
- Inspection records are retained on file at the IW Facility for a minimum period of three (3) years.
- If a field-constructed aboveground container undergoes a repair, alteration, reconstruction, or a change in service that might affect the risk of a discharge or failure due to brittle fracture, the container will be evaluated and as necessary, appropriate action will be taken.
- Fuels and lubricants store in aboveground storage tanks are subject to periodic AST inspections per Section 6.0 of the STI SP001.

4.8 CORROSION PREVENTION OR CORROSION MONITORING TECHNIQUES UTILIZED

SPR utilizes various corrosion prevention and monitoring techniques throughout its facilities, examples include:

- Internal sacrificial anodes to prevent tank corrosion.
- Tanks are internally and externally coated.

- Buried oil pipelines are wrapped/coated to reduce exterior corrosion, when a section of buried line is exposed for any reason, it is examined for deterioration and corrective action is taken as indicated per the magnitude of observed corrosion.
- Chemical treatment is utilized as necessary to prevent internal corrosion.
- Bulk oil storage tanks, flowlines and valves, etc. are compatible with the type of production fluids handled.
- Non-destructive examinations are performed, including ultrasonic and visual inspections, radiography (for new construction butt welds), magnetic particle and dye penetrant (for new fillet welds, i.e. “hot tapping”) and high resolution inspection tools (smart pigs).
- Corrosion coupons and chemical analysis - (Iron Manganese, Chemical Inhibitor Residuals, Sulfate Reducing Bacteria Cultures).
- Hydrotesting.
- Pipeline maintenance cleaning “Pigs”.

5.0 TRANSFER OPERATIONS, PUMPING, AND IN-TERMINAL PROCESS

5.1 ABOVEGROUND VALVES AND PIPING INSTALLATIONS

The IW Facility's buried piping installations are provided with corrosion protection as follows:

- Aboveground valves and pipelines are regularly examined during operating personnel rounds. During these examinations, operating personnel assess the general condition and necessity for corrective actions of the items such as:
 - Flange joints
 - Valve glands and bodies
 - Pipeline supports
 - Metal surfaces
 - Expansion joints
 - Catch pans
 - Valves locks and/or seals
- Pipelines, valves and fittings are installed and supported to withstand stresses imposed by internal and external loads.
- Pipe supports are designed to minimize abrasion and corrosion, and to allow for expansion and contraction.
- Piping systems are protected with pressure safety relief devices set to function at pressures within the safe working pressure of all components of the system.
- Most valves and aboveground piping receive frequent informal inspections during routine plant operations in addition to the formal inspection program.
- Records of negative findings from these examinations are documented in the operating personnel logs, or other inspection records.

5.2 BURIED PIPING INSTALLATIONS

The IW Facility's buried piping installations are provided with corrosion protection as follows:

- Most buried piping installations are wrapped and coated to protect against external corrosion.
- Most buried piping installations are cathodically protected.
- When a section of buried line is exposed for any reason, it is examined for deterioration.

5.3 OUT-OF-SERVICE PIPELINES

In the event that an IW Facility pipeline is removed from service or is placed in standby service for an extended time:

- The connection at the transfer point is capped or blind-flanged.
- The line is marked as to its origin.

5.4 PRODUCED WATER STORAGE FACILITIES

Produced Water Storage Facilities are frequently inspected for signs of leaks and after sudden changes in atmospheric temperature as follows:

- The produced water and re-injection water facilities are visually inspected during operating personnel rounds.
- Produced water and collected rainwater is re-injected into injection wells.

5.5 FLOWLINE MAINTENANCE

The IW Facility's flowlines are inspected and maintained as follows:

- Flowlines are inspected for signs of leakage during operating personnel rounds.
- Buried flowlines are coated/wrapped, as needed, and whenever pre-existing lines are repaired or replaced.
- Flowline inspections (visual) are conducted in more detail in conjunction with an established Flowline Maintenance Program. The Pipeline Management Plan (PMP) (separate document) contains the flowline maintenance plan and is continually maintained and updated at least annually, as required by CA CCR, Title 14, Division 2, SS 1774.2. Areas of concern or environmentally sensitive areas are identified in the PMP for prompt evaluation and action if determined to be necessary.
- The Flowline Maintenance Program provides for replacement of line sections where there are indications that system integrity may be inadequate.

5.6 DRILLING AND WORKOVER FACILITIES

- Mobile drilling or workover equipment will be positioned to ensure discharges are directed to the drainage trenches and secondary containment area.
- Diversion structures will be in-place to intercept and contain such discharges.
- A blowout preventer (BOP) assembly and well control system is installed before drilling and well servicing below any casing string and as required during workover operations.
- The BOP assembly is capable of controlling any expected wellhead pressure.
- Casing and BOP installations conform to state regulations.
- Wellhead and subsurface safety devices are not present at the IW facility.

5.7 VEHICLE WARNING PROCEDURES

The procedures for warning vehicles entering the IW Facility to avoid damaging aboveground piping or other equipment are as follows:

- Vehicular traffic granted entry into the IW Facility are warned verbally, or by appropriate signs, to ensure that the vehicle will not endanger aboveground piping.
- All personnel are prohibited by Company policy to use vehicles inside firewalls for any purpose unless it is necessary for an essential maintenance function.
- Speed signs are posted at the entrance of the IW Facility and where appropriate throughout the IW Facility.
- Bumper guards are used in critical areas where aboveground piping is present

6.0 TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK

There are typically no tank car or truck loading/unloading operations at the IW Facility subject to 40 CFR 112. Products are transported via pipelines.

Loading/unloading headers are provided for occasional truck loading/unloading of crude and natural gas liquids. They are situated such that a release would not flow off site. When such operations are performed, they are continuously monitored.

7.0 SECURITY

The SPCC regulations pertaining to security, 40 CFR 112.7(g), specifically exempt oil production facilities, however, a brief discussion of facility security is included herein.

The IW facility is surrounded by fencing and is staffed at all times. Other security measures taken at the facility include:

- The IW Facilities handling, processing or hydrocarbon storage areas are fenced, walled, and gated.
- A gated entrance controls access to the IW Facility, and a security guard is located at the northern access gate. Only authorized personnel, properly trained in the operation of the IW Facility, are approved to operate equipment controls or valves.
- Starter controls on all oil pumps are accessible only to authorized personnel or operated by automatic control. Pumps in non-operating status are locked/tagged in the off position.
- Oil pipelines that are not in service are capped or blank-flanged.
- The facility has adequate lighting to allow the discovery of discharges during hours of darkness and to aid in preventing acts of vandalism.
- Security cameras are used to prevent unauthorized access through the gates.
- A SCADA (Supervisory Control and Data Acquisition) system is utilized to monitor facility operations and alarms are designed to alert personnel of problems, leaks, or failures of equipment.

8.0 FACILITY SPECIFIC DATA

The IW Facility is located between Baldwin Hills, Blair Hills, West Los Angeles College, and Windsor Hills, in Los Angeles. The office is located at 5640 S Fairfax Ave, in Los Angeles. The IW Field produces approximately 3,400 barrels (143,000 gallons) per day of crude oil and approximately 2,100 cubic feet per day of natural gas. It has approximately 180,000 barrels (7,560,000 gallons) of active bulk storage capacity in crude and produced water service, contained in 42 storage tanks ranging from 100 to 10,000 barrels (4,200 to 420,000 gallons).

Production from various former leases has been consolidated into five central production batteries, identified as: BC; LAI (A); LAI (B); TVIC; and Packard, as shown on **Figures 3, 4, and 5**. Crude oil is separated from the produced water at each of these batteries and is then transferred to the Packard Tank Setting before being shipped from the field. Produced water is processed and transferred to the Inglewood Water Plant Tank battery where an additional ten tanks are utilized for further treatment before being re-injected back into the production zones.

There are a total of 42 crude oil and produced water storage tanks at the central batteries. At the time of this update, four of the tanks were off-line and one was out of service. Processed crude oil is shipped from the Inglewood field via gathering lines and into the sales lease automatic custody transfer (LACT) lines. Processed gas is transferred into two gas utility companies' distribution systems. Processed natural gas is sold to both Southern California Gas via SCG's distribution system, and also to Marathon (formerly Andeaver/Tesoro) via pipeline owned/operated by Marathon, which utilizes natural gas at their refinery in Carson, CA.

Throughout the fields there are several off-line storage tanks that in recent years have been idled by reason of consolidating the field production into the five central batteries. These off-line tanks have been emptied and do not represent a potential spill source.

Each tank in the Inglewood field is equipped with high/low level alarms and a fully automated vapor recovery system. The Inglewood Sales Gas Compressor is equipped with gas detectors, high level and high/low pressure alarms/shutdowns where required. The water injection pumps are monitored via high/low pressure alarms, in addition a red indicator light appears when any pump goes down. All alarms are sent to the Operators pager and cellular phone alerting the Operator of a possible problem.

Six electrical substations are present in the vicinity of Packard Tank Battery (see **Figure 4**) which contain oil in a quantity greater than 55-gallons.

Substation details are listed in the table below and on the master tank table.

Electrical Substations	Transformer (KVA)	Oil Capacity (gallons)	Oil Capacity (barrels)
Substation # 2	3,750	586	13.95
Substation # 3	5,000	732	17.43
Substation # 4	3,750	567	13.50
Substation # 6	3,750	608	14.48
Substation # 7	3,750	860	20.48
Substation # 13	3,750	996	23.71

Notes

Only substations with an oil capacity greater than 55-gallons listed

KVA = KiloVolt-Ampere

CONTAINMENT VOLUME CALCULATIONS

Secondary containment for the storage tanks within the Inglewood field is provided by a combination of block walls and earthen berms around major tank batteries and retention basins located throughout the area. The available secondary containment exceeds the required capacity, based on the capacity of the largest tank, less displacement of other tanks and deadwood in the containment area with allowance for rainfall.

Four of the major tank batteries have direct concrete block and earthen wall containment. This direct containment is supplemented by ten (10) major retention basin systems (composed of a total of 16 individual basins) and numerous smaller basins and ditches that would trap an oil spill before it escaped the property. Other tanks situated at various locations throughout the field have minimal or no direct secondary containment. The retention basins provide the needed containment for those tanks, as well as for spills that may occur from field piping and equipment.

The available capacities provided for tanks located within the four major tank areas are shown in the following table and containment calculation sheets. The volume of each of the retention basin systems is based on earlier elevation surveys and recent GIS/CAD modeling of the basin contours, with subsequent volume calculations completed by SPR. This information was used to calculate the net available capacity for oil spills after deducting the potential rainfall volume (based on a storm of 1.2-inches over a 24-hour period) over the ground surface area that the retention basins serve.

The table of basin volumes below shows the available storage volume to capture a release during a significant rainstorm event. The total available storage volume for the entire oil field during a 1.2-inch rainfall event is 31.68 acre feet (245,768 barrels).

Table of Retention Basin Volumes

RETENTION BASIN	VOLUME				
	GROSS (Gallons)	GROSS (Acre Feet)	RAINFALL (Acre Feet)	NET OPEN (Acre Feet)	NET OPEN (Barrels)
LAI North (3 basins)	761,037	2.34	1.10	1.24	9,586
LAI South (4 basins)	2,133,832	6.55	2.99	3.56	27,608
RJ Basin (Upper Dabney)	449,279	1.38	1.00	0.38	2,939
Dabney-Lloyd	1,146,084	3.52	2.50	1.02	7,892
Packard	26,800	0.08	0.08	0.00	0
Shell	338,886	1.04	1.04	0.00	0
Stocker	3,743,242	11.49	1.92	9.57	74,229
Vickers-1 (2 basins)	3,633,753	11.15	1.09	10.06	78,061
Lower Vickers-2	871,656	2.68	0.16	2.52	19,512
Upper Vickers-2	1,340,442	4.11	0.77	3.34	25,941

EXAMPLE TANK BATTERY CONTAINMENT VOLUME CALCULATION

BC Tank Battery (see Figures 4, 10, and 12 for tanks, catch basins, and drainage or release flow direction arrows)

Largest Tank = 10,000 Bbls.

Tank Battery Secondary Containment:

Area = 29,990 sf

Effective Depth = 24"

Volume = $(29,990 \times 2) / 5.615$
= 10,682 Bbls.

Deductions:

Rainfall = 534 Bbls.

Deadwood (1 %) = 107 Bbls.

Other Tanks (4) = 1,333 Bbls.

Net Containment = 8,708 Bbls.

Supplemental Containment

LAI Retention Basin System Capacity = 37,194 Bbls
(after allowance for drainage area rainfall)

Available Secondary Containment = 45,902 Bbls.
= 459%

Field/Site	Lease/Facility	L/F	Key ID	IS/OOS	Tank ID	Tank ID SCADA	AQMD Facility ID	AQMD A/N #	AQMD Device ID	CalGEM Tank Type (WellStar)	Description	Tank Label	Contents	Capacity (BBLs)	GPS (Latt, Long)	Comments
Inglewood	BC Tank Setting	BC	9	IS	T-11	T-25	184301	592654	D349	Wash Tank	Wash Tank	T-25 / BC 5,000 BBL / Wash Tank	90% Produced Water, 10% Oil	5,000	(34.0003485839298, -118.366752)	Tank in good condition
Inglewood	BC Tank Setting	BC	9	IS	T-2	T-22	184301	592654	D348	Wash Tank	Wash Tank	T-22 / ING #2 10,000 BBL / WashTank	90% Produced Water, 10% Oil	10,000	(33.9999582366509, -118.366747576105)	Tank in fair condition
Inglewood	BC Tank Setting	BC	9	IS	T-3	T-23	184301	592654	D350	Wash Tank	Wash Tank	T-23 / ING #3 10,000 BBL / Wash Tank	90% Produced Water, 10% Oil	10,000	(34.0002060222123, -118.36707307704)	Tank in good condition
Inglewood	BC Tank Setting	BC	9	IS	T-4	T-24	184301	592654	D39	Wash Tank	Wash Tank	T-24 / ING #4 10,000 BBL / Wash Tank	90% Produced Water, 10% Oil	10,000	(34.0005321883089, -118.366666387401)	Tank in fair condition
Inglewood	BC Tank Setting	BC	9	IS	T-5	T-27B	184301	592654	D46	Stock Tank	Stock Tank	T-27B / Standby 1,000 BBL / Stock Oil	100% Crude Oil	1,000	(33.9999662233139, -118.367102982419)	Tank in fair condition
Inglewood	BC Tank Setting	BC	9	IS	T-6	T-27A	184301	592654	D45	Stock Tank	Stock Tank	T-27A / BC 3,000 BBL / Stock Oil	100% Crude Oil	3,000	(34.0000369728128, -118.367181618294)	Tank in fair condition
Inglewood	BC Tank Setting	BC	9	IS	T-7	T-26	184301	592654	D44	Stock Tank	Stock Tank	T-26 / ING #2 3,000 BBL / Stock Oil	100% Crude Oil	3,000	(34.0001518056355, -118.367297602868)	Tank in fair condition
Inglewood	LAI Tank Setting (2)	LA2	11	IS	T-36	T-36	184301	592654	D36	Stock Tank	Stock Tank	Inglewood #5 Stock tank	Crude Oil	5,000	(33.993286127753, -118.368181856555)	
Inglewood	LAI Tank Setting (2)	LA2	11	IS	T-30	T-30	184301	592653	D360	Surge Tank	Surge Tank	Gunnite Tank 5K	Crude Oil / Water	5,000	(33.9931475489877, -118.368110793671)	Tank in good condition
Inglewood	LAI Tank Setting (2)	LWP	5	IS	T-14	T-14	184301	592653	D21	Stock Tank	Stock Tank	T-1 Inglewood / VIC - 12 LAI - 35	Produced Water, Oil	10,000	(34.0010796494475, -118.370142118902)	Tank in fair condition
Inglewood	LAI Tank Setting (2)	NWP	5	IS	T-3	T-3	184301	592661	D66	Skim Tank	Skim Tank	T-2 / T-3 Slop Tank 1,000 bbls	Crude Oil 20%, Water 80%	1,000	(34.000663960312, -118.369869632436)	Tank in fair condition
Inglewood	LAI Tank Setting (2)	NWP	5	IS	T-4	T-4	184301	592661	D60	Slop Tank	Slop Tank	T-4 Produced Water	90% Produced Water, 10% Oil	10,000	(34.0017866188185, -118.370467090089)	Tank in good condition / Internal Inspection & Tank Cleaning performed 11-12-19
Inglewood	Packard Tank Setting	PKD	8	IS	T-1	T-56B	184301	592648	D19	Stock Tank	Stock Tank	T-56B	Crude Oil	5,000	(34.0042941863489, -118.368382663425)	Tank in fair condition
Inglewood	Packard Tank Setting	PKD	8	IS	T-2	T-56A	184301	592648	D20	Stock Tank	Stock Tank	T-56A	Crude Oil	5,000	(34.0044165862734, -118.368400324027)	Tank in good condition
Inglewood	Packard Tank Setting	PKD	8	IS	T-3	T-56C	184301	592648	D366	Stock Tank	Stock Tank	--	Crude Oil	5,000	(34.0041459770923, -118.368361290795)	Tank in fair condition
Inglewood	Packard Tank Setting	PKD	8	OOS	T-4	T-50	184301	592648	D339	Wash Tank	Wash Tank	T-50	Wash Tank	5,000	(34.0040113131964, -118.368330423584)	Tank in good condition / Tank offline 4/1/19
Inglewood	Packard Tank Setting	PKD	8	IS	T-5	T-52	184301	592648	D15	Slop Tank	Sand Tank	T-52 / Sand Tank / 200 BBLs	Crude Oil 20%, Water 80%	200	(34.0047648853452, -118.368806584048)	Tank in fair condition
Inglewood	Packard Tank Setting	PKD	8	IS	T-7	T-51	184301	592648	D17	Produced Water	Waste Water Tank	T-51	Packard Waste Water	500	(34.00483744819, -118.368884161117)	Has leak detection/ Tank in fair condition
Inglewood	Packard Tank Setting	PKD	8	IS	--	--	N/A	N/A	N/A	Lube Oil	Lube Oil	--	Lube Oil	3,000	(34.00449861, -118.3712338)	Tank in good condition
Inglewood	Water Plant, Lower	LWP	10	IS	T-1A	T-1A	184301	592661	D67	Produced Water	Raw Water Tank	T-1A Raw tank	Produced Water w/ trace of oil	5,000	(34.0010564817525, -118.36952266245)	Tank in fair condition
Inglewood	Water Plant, Lower	LWP	10	IS	T-1B	T-1B	184301	592661	D68	Produced Water	Raw Water Tank	T-1B Raw tank	Produced Water w/ trace of oil	5,000	(34.0010680532718, -118.369721458151)	Tank in fair condition
Inglewood	Water Plant, Lower	LWP	10	IS	T-2A	T-2A	184301	592661	D69	Surge Tank	Surge Tank	Surge tank A	Produced Water	1,000	(34.0013030159498, -118.369841052255)	Tank in good condition
Inglewood	Water Plant, Lower	LWP	10	IS	T-2B	T-2B	184301	592661	D70	Surge Tank	Surge Tank	Surge tank B	Produced Water	1,000	(34.0013909322672, -118.369830206677)	Tank in good condition
Inglewood	Water Plant, Lower	LWP	10	IS	T-9A	T-9A	184301	592661	D364	Produced Water	Clean Tank	T-9	Produced Water	5,000	(34.0021204160987, -118.369974466064)	Tank in good condition
Inglewood	Water Plant, Lower	LWP	10	IS	T-9B	T-9B	184301	592661	D365	Produced Water	Clean Tank	T-10	Produced Water	5,000	(34.0020062544338, -118.369886248591)	Tank in good condition
Inglewood	Water Plant, Upper	UWP	10	IS	T-11A	T-11A	184301	N/A	N/A	Surge Tank	Surge Tank	Raw Tank T-11A Produced Water	Unfiltered Produced Water	5,000	(34.0012035390847, -118.368541729751)	Tank in good condition
Inglewood	Water Plant, Upper	UWP	10	IS	T-11B	T-11B	184301	N/A	N/A	Surge Tank	Surge Tank	Raw Tank T-11B Produced Water	Unfiltered Produced Water	5,000	(34.0013367030892, -118.368541730131)	Tank in good condition
Inglewood	Water Plant, Upper	UWP	10	IS	T-5A	T-5A	184301	592661	D336	Produced Water	Raw Water Tank	Raw Tank T-5A	Produced Water w/ trace of oil	5,000	(34.0012413269391, -118.368760670778)	Tank in fair condition
Inglewood	Water Plant, Upper	UWP	10	IS	T-5B	T-5B	184301	592661	D353	Produced Water	Raw Water Tank	--	Produced Water w/ trace of oil	5,000	(34.0014236126932, -118.368760680665)	Tank in fair condition
Inglewood	Water Plant, Upper	UWP	10	IS	T-7	T-7	184301	592661	D354	Produced Water	Clean Tank	T-6	Produced Water	5,000	(34.0020125650409, -118.368760660304)	Tank in fair condition
Inglewood	TVIC Tank Setting	TVC	6	IS	T-1	T-46	184301	592684	D124	Stock Tank	Stock Tank	T-46 / TVIC Crude Oil / 5K #1	Crude Oil	5,000	(34.0126000854215, -118.38193142771)	Tank in fair condition
Inglewood	TVIC Tank Setting	TVC	6	IS	T-2	T-41	184301	592684	D109	Wash Tank	Wash Tank	T-41 / OOS	Produced Water, Oil	3,000	(34.0123565418268, -118.38187309183)	Tank in poor condition
Inglewood	TVIC Tank Setting	TVC	6	IS	T-3	T-40B	184301	592684	D111	Wash Tank	Wash Tank	T-40B / TVIC Oil & Water #3 / 5,000 BBL	Produced Water, Oil	5,000	(34.0123731553072, -118.381716733006)	Tank in fair condition
Inglewood	TVIC Tank Setting	TVC	6	IS	T-4	T-40A	184301	592684	D110	Wash Tank	Wash Tank	T-40A / TVIC #2 / 5000 BBL	Produced Water, Oil	5,000	(34.0124812599698, -118.38182327495)	Tank in good condition
Inglewood	TVIC Tank Setting	TVC	6	IS	T-5	T-42	N/A	N/A	N/A	Fresh Water Tank	Fresh Water Tank	T-42 / TVIC Fresh Water	Non-Potable Water Storage Tank	1,000	(34.0122803797844, -118.381606001512)	Fresh Water F/Cal American
Inglewood	TVIC Water Plant	TWP	7	IS	A ³	T-47	184301	592673	D129	Chemical	Emulsion Tank	T-47 / TVIC / Emulsion Tank	Sand/Oil/Water	3,000	(34.0105909220469, -118.380809196371)	
Inglewood	TVIC Water Plant	TWP	7	IS	B ³	T-45	184301	592673	D128	Produced Water	Raw Water Tank	T-45 / TVIC Pre-Wemco	Produced Water, Oil	3,000	(34.0111212166529, -118.381431701032)	Fit for service
Inglewood	TVIC Water Plant	TWP	7	OOS	C ³	T-49	184301	592673	D130	Source Water	Rain Run-off Tank	TVIC / Rain Run-off	Sand/Oil/Water	500	(34.0099407546563, -118.381005813172)	Tank in poor condition / Standby tank - Offline
Inglewood	TVIC Water Plant	TWP	7	IS	D ³	T-48	184301	592673	D132	Produced Water	Clean Tank	T-48 / TVIC Clean Tank	Produced Water	5,000	(34.0105698258019, -118.380939038745)	Tank in fair condition
Inglewood	Vic1 Tank Setting	VIC	4	IS	T-70A	T-70A		N/A	N/A		Produced Water	T-70A	Produced Water	500	(34.00166105, -118.3753488)	Tank in good condition
Inglewood	Vic1 Tank Setting	VIC	4	IS	T-70B	T-70B		N/A	N/A		Produced Water	T-70B	Produced Water	500	(34.00166105, -118.3753488)	Tank in good condition
Inglewood	Vic1 Tank Setting	VIC	4	IS	T-70C	T-70C		N/A	N/A		Produced Water	T-70C	Produced Water	500	(34.00166105, -118.3753488)	Tank in good condition

Tank Schedule / Inspection

FIELD/SITE	LEASE/FACILITY	L/F	KEY ID	IS/OOS	TANK ID	TANK ID SCADA	AQMD FACILITY ID	AQMD A/N #	AQMD DEVICE ID	CalGEM TANK TYPE (WellStar)	DESCRIPTION	TANK LABEL	CONTENTS	CAPACITY (BBLs)	GPS (Latt, Long)	Comments
Non Crude Storage Tank Area																
Inglewood	LAI-North	LA1	8	IS		N/A	N/A	N/A	N/A		Area 1 Diesel Rack	500-gallon tank	Chevron ISO 68 Lubricant	11.9	(34.0036576, -118.3702769)	Tank in fair condition
Inglewood	LAI-North	LA1	8	IS		N/A	N/A	N/A	N/A		Area 1 LWP Fire Wtr pump	500-gallon tank	Diesel Fuel	11.9	(34.00166348, -118.3696793)	Tank in fair condition
Inglewood	LAI-North	LA1	8	IS		N/A	N/A	N/A	N/A		Diesel Rack - SPR	1,000-gallon tank	Clear Diesel Fuel #2	23.8	(34.00360624, -118.3703483)	Tank in fair condition
Inglewood	LAI-North	LA1	8	IS		N/A	N/A	N/A	N/A		Diesel Rack-SPR	1,000-gallon tank	Diesel Fuel #2	23.8	(34.00362724, -118.3703729)	Tank in fair condition
Inglewood	LAI-North	LA1	8	IS		N/A	N/A	N/A	N/A		Diesel Rack - SPR	1,000-gallon tank	Red Dyed Diesel	23.8	(34.00359868, -118.3703701)	Tank in fair condition
Inglewood	LAI-North	LA1	8	IS		N/A	N/A	N/A	N/A		Diesel Rack - King Oil Tool	2,000-gallon tank	Diesel Fuel	47.6	(34.00362759, -118.3702675)	Tank in fair condition
Inglewood	LAI-North	LA1	8	IS		N/A	N/A	N/A	N/A		Diesel Rack- CA Well Services	500-gallon tank	Clear Diesel Fuel	11.9	(34.0036285, -118.3702188)	Tank in fair condition
Inglewood	LAI-North	LA1	8	IS		N/A	N/A	N/A	N/A		Diesel Rack - MA	500-gallon tank	Clear Diesel Fuel	11.9	(34.00363751, -118.3703389)	Tank in fair condition
Inglewood	LAI-North	LA1	8	IS		N/A	N/A	N/A	N/A		Diesel Rack- PCL	500-gallon tank	Clear Diesel Fuel	11.9	(34.00366318, -118.3702586)	Tank in fair condition
Inglewood	LAI-North	LA1	8	IS		N/A	N/A	N/A	N/A		Diesel Rack - SOS	1,000-gallon tank	Clear Diesel Fuel	23.8	(34.00365246, -118.3703009)	Tank in fair condition
Inglewood	LAI-North	LA1	8	IS		N/A	N/A	N/A	N/A		Diesel Rack - EWS	1,000-gallon tank	Clear Diesel Fuel	23.8	(34.0036074, -118.3702947)	Tank in fair condition
Inglewood	LAI-North	LA1	8	IS		N/A	N/A	N/A	N/A		Diesel Rack- Sturgeon	1,500-gallon tank	Gasoline unleaded Regular	35.7	(34.00366504, -118.3702084)	Tank in fair condition
Inglewood	Stocker		5	IS		N/A	N/A	N/A	N/A	ConVault	Main Office Garage	2,000-gallon tank	Gasoline Unleaded Regular	48	(33.9899225, -118.3605392)	Tank in fair condition
Inglewood	Stocker		5	IS		N/A	N/A	N/A	N/A	--	Used Oil Filters	55-gallon drums	Used Oil Filters	55-gal		Drums in fair condition
Inglewood	Stocker		5	IS		N/A	N/A	N/A	N/A		Used Oil AST	200-gallon tank	Waste Oil	4.76		Tank in fair condition
Transformers																
Inglewood	Vic1 Tank Setting	VIC	4	IS		Sub-2	N/A	N/A	N/A		Electrical Substation #2		Oil	13.95	(34.00244412, -118.3747159)	Substation in good condition
Inglewood	LAI-North	LA1	8	IS		Sub-3	N/A	N/A	N/A		Electrical Substation #3		Oil	17.43	(33.99697753, -118.3653102)	Substation in good condition
Inglewood	Water Plant, Lower	LWP	4	IS		Sub-4	N/A	N/A	N/A		Electrical Substation #4		Oil	13.50	(33.99867748, -118.3656791)	Substation in good condition
Inglewood	Packard Tank Setting	PKD	8	IS		Sub-6	N/A	N/A	N/A		Electrical Substation #6		Oil	14.48	(34.00369091, -118.3691041)	Substation in good condition
Inglewood	Vic1 Tank Setting	VIC	4	IS		Sub-7	N/A	N/A	N/A		Electrical Substation #7		Oil	20.48	(34.00638888, -118.3775453)	Substation in good condition
Inglewood	Vic1 Tank Setting	VIC	4	IS		Sub-13	N/A	N/A	N/A		Electrical Substation #13		Oil	23.71	(34.00732720, -118.3774836)	Substation in good condition

NOTES:

A. This table lists only crude and untreated produced water storage tanks that represent potential spill sources. Clean water tanks are not listed. Out-of-service tanks are free of liquid.

B. The direction of flow for tank releases that might escape from the initial secondary containment basin is toward and into oil-trapping retention ponds situated throughout the field. A release from the BC, LAI (A) and LAI (B) batteries would flow southward to a retention pond at the south edge of the field east of La Cienega Boulevard. A release from the TVIC battery would flow southwest to a retention pond at the southwest corner of the field. A release from the Inglewood Shipping battery would flow north to a retention pond at the north edge of the field.

C. The BC tank battery is in a basin with earthen walls and floor, with adequate containment capacity. See the containment calculations in Section 8.

D. The LAI (A) and LAI (B) batteries are not situated within initial secondary containment basins. Releases from these tanks would be directed to adjacent retention ponds and ultimately to an oil-trapping pond at the south edge of the property, which has ample capacity for containing the largest tank.

E. The Stocker, TVIC and Inglewood tank batteries are within basins with concrete block walls and floor, with adequate containment capacity. See the containment details following this table.

F. All surface drainage within the drill sites is directed to sumps designed to provide secondary containment for the largest tank at the facility in case of a release. No flow escapes the perimeter of the sites. All releases and all surface drainage is pumped to the Inglewood Field.

FOOTNOTES:

¹ Internal inspections refer to a determination of the bottom plate thickness, which are to be "no less than once every 20 years". Reference the following line to Title 14, Div 2, Chp 4, SubChp 2, Art 3 Section 1773-4(d). [https://govt.westlaw.com/calregs/Document/I6AA6247019F511E0A78EE0FAA727413D?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Document/I6AA6247019F511E0A78EE0FAA727413D?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default))

² Tank wall thickness inspection is "at least once every five years." Per Title 14, Div 2, Chp 4, SubChp Art 3 Section 1773-4 (a)(1). Operators must notify DOGGR two days or more prior to conducting required tank testing.

³ The following link is to the Dept of Conservation, Pipelines and Facilities web link. Scroll down to and reference "For Operators" and "Tank Identification, Testing, and Maintenance". Requirements mirror Title 14, Div 2, Chp 4.2 Article 3 requiremen https://www.conservation.ca.gov/dog/for_operators/Pages/Facilities.aspx

⁴ Current PDF Site Plans =>

⁵ Based on permitting records, estimated installation date was in September 2009.



SCS ENGINEERS

ENVIRONMENTAL CONSULTANTS

3900 KILROY AIRPORT WAY, SUITE 100
 LONG BEACH, CA 90805
 PH. (562) 426-9544 FAX. (562) 427-0805

CLIENT:



DATE:
 10-20-2020

SCALE:
 1"=6,500

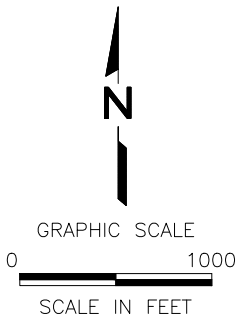
PROJECT TITLE:

INGLEWOOD OIL FIELD SITE LOCATION MAP
 LOS ANGELES COUNTY, CALIFORNIA

DRAWING NO.
 FIGURE 1

PROJ. NO. 01219263.00	DRAWN BY: RR	ACAD FILE: ---
DESIGN BY: RR	CHECK BY: JD	APP. BY: JD

C:\Users\2747r-r\Desktop\My Stuff\SCS\er's\ES GROUP\E-Ortenberg\2025 SPR FIGURES\01-DWG\SPR Inglewood Figures.dwg Jun 27, 2025 - 11:56am By: raulramirez



LEGEND

FIGURE
DETAIL AREA

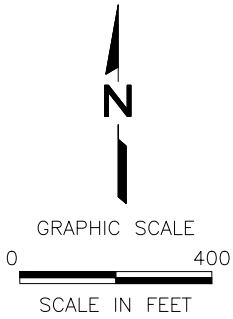
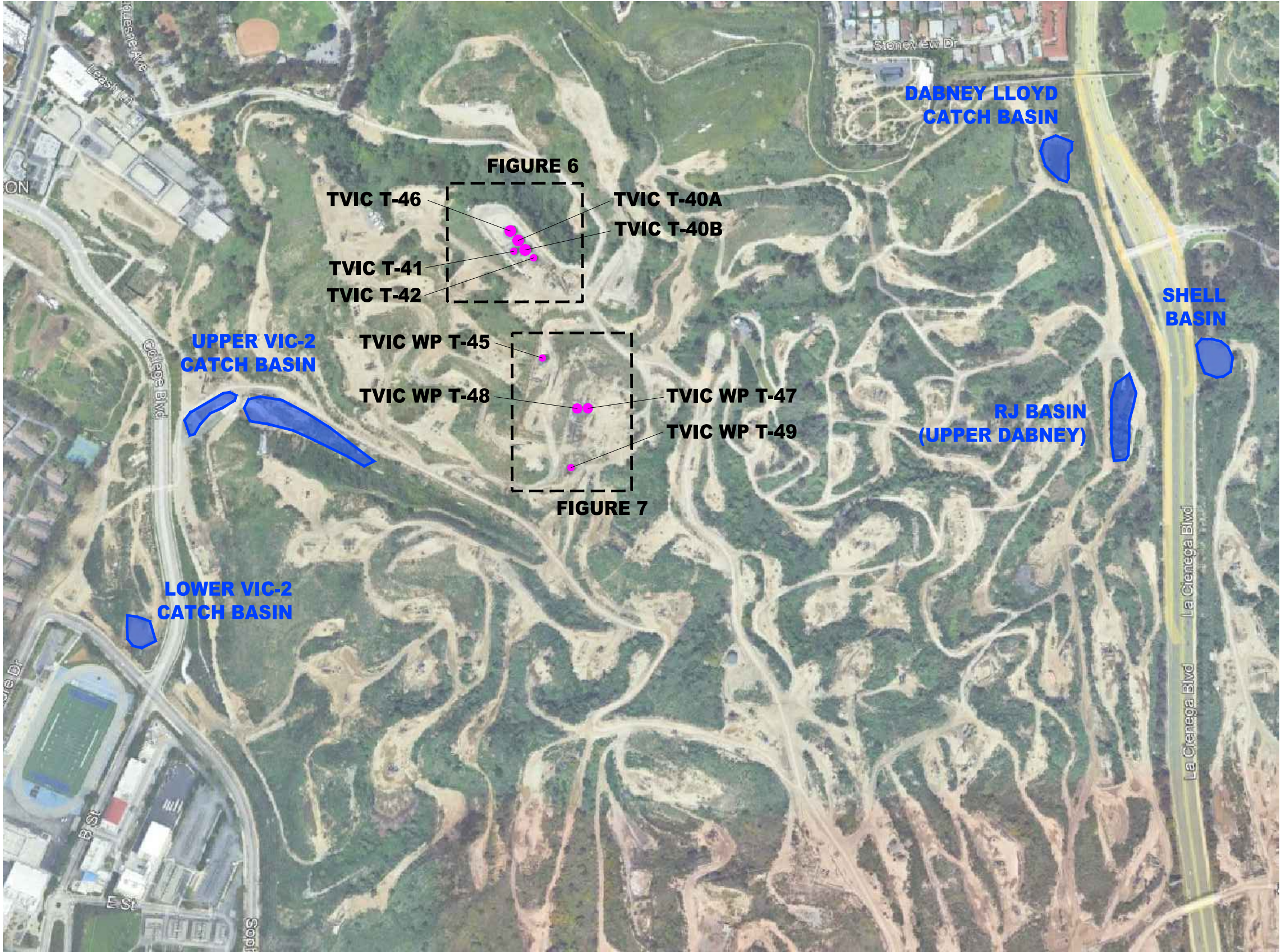


- FIGURE 3 - INCLUDES TVIC AND TVIC WATER PLANT TANK SETTING
- FIGURE 4 - INCLUDES PACKARD, LAI (A), UPPER AND LOWER WATER PLANT, AND BC TANK SETTING
- FIGURE 5 - INCLUDES LAI (B) TANK SETTING
- SPILL CONTAINMENT CATCH BASIN

IMAGE SOURCE: GOOGLE EARTH

CLIENT:									
SCS ENGINEERS ENVIRONMENTAL CONSULTANTS 3900 ALFREY AIRPORT WAY, SUITE 300 LONG BEACH, CA 90806 PH: (562) 426-9544 FAX: (562) 427-0805				ACAD FILE:					
				PROJ. NO. 01219263.00	DWN. BY: RR	CHK. BY: EO	APP. BY: EO		
DATE: 05-23-2025				DSN. BY: RR	CHK. BY: EO	APP. BY: EO	EO		
SCALE: 1"=1000'									
FIGURE NO. 2									
SHEET TITLE: SITE MAP				PROJECT TITLE: INGLEWOOD OIL FIELD SITE LOCATION MAP LOS ANGELES COUNTY, CALIFORNIA				NO.	
								△	
								△	
								△	
								△	
				REVISION		DATE			

C:\Users\2747r_r\Desktop\My Stuff\SCS\er's\ES GROUP\E. Ortenberg\2025 SPR FIGURES\01-DWG\SPR Inglewood Figures.dwg Jun 27, 2025 - 11:56am By: raulramirez



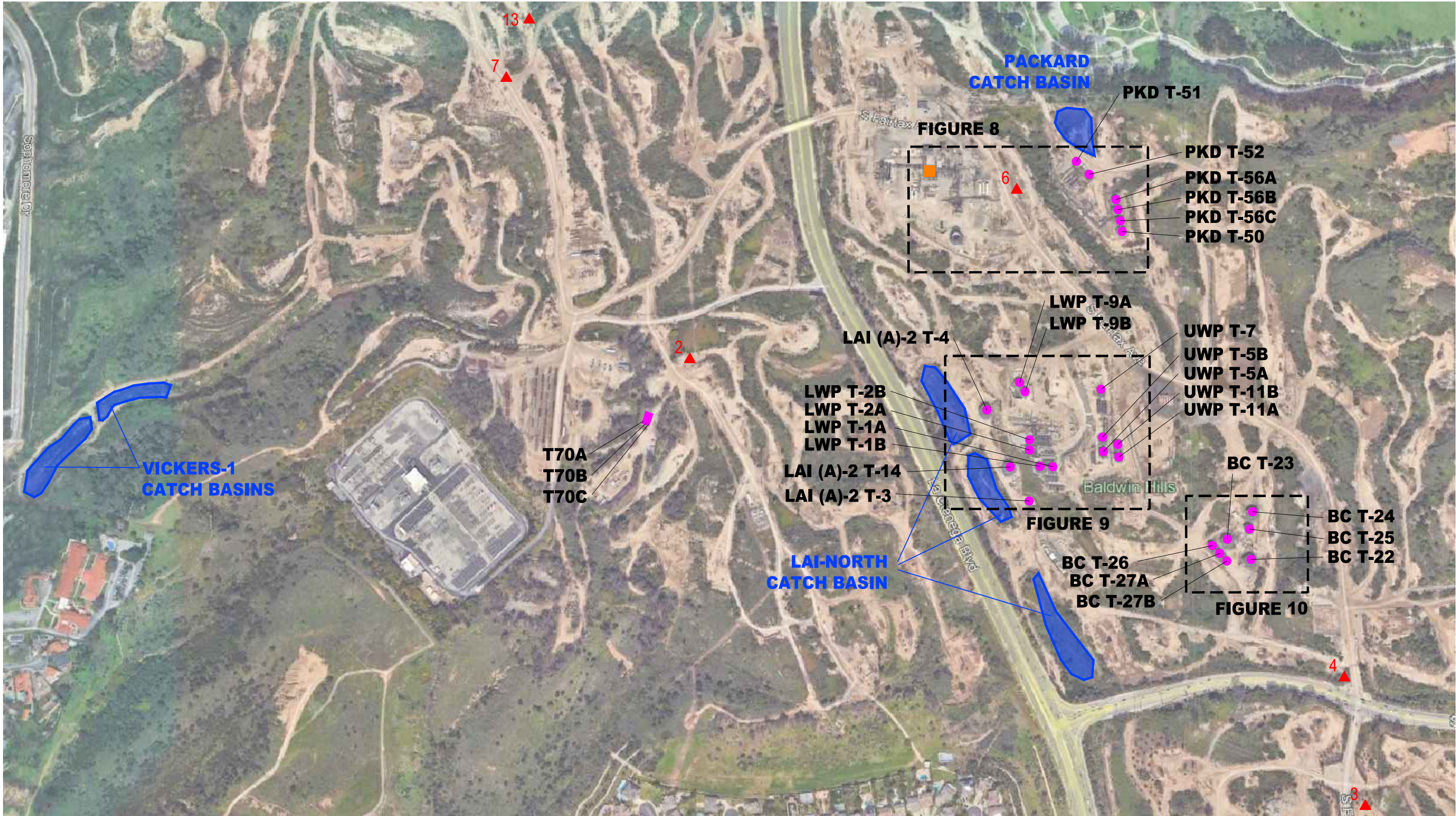
LEGEND

FIGURE DETAIL AREA	[Dashed Box]	FIGURE 6 - TVIC TANK SYSTEM
	[Dashed Box]	FIGURE 7 - TVIC WATER PLANT SYSTEM
	[Blue Polygon]	SPILL CONTAINMENT CATCH BASIN
	[Pink Dot]	ABOVE GROUND STORAGE TANKS

SCS ENGINEERS ENVIRONMENTAL CONSULTANTS 3900 ALFREY AIRPORT WAY, SUITE 300 LONG BEACH, CA 90806 PH: (562) 426-9544 FAX: (562) 427-0805				DATE: 05-23-2025	
FIGURE NO. 3				SCALE: 1"=400'	
CLIENT: SENTINEL PEAK RESOURCES				SHEET TITLE: TVIC AND TVIC WATER PLANT TANK	
PROJECT TITLE: INGLEWOOD OIL FIELD SITE LOCATION MAP LOS ANGELES COUNTY, CALIFORNIA				NO. 1 2 3 4 5 6	
				REVISION	
				DATE	

IMAGE SOURCE: GOOGLE EARTH

C:\Users\2747r-r\Desktop\My Stuff\SCSer's\ES GROUP\E. Ortenberg\2025 SPR FIGURES\01-DWG\SPR Inglewood Figures.dwg Jun 27, 2025 - 11:56am By: raulramirez



LEGEND

- FIGURE
DETAIL AREA

FIGURE 8 - PACKARD TANK SETTING

FIGURE 9 - LAI (A) AND UPPER/LOWER
WATER PLANT TANK SYSTEMS

FIGURE 10 - BC TANK SETTING
- SPILL CONTAINMENT CATCH BASIN

ABOVE GROUND STORAGE TANKS

3,000 GALLON LUBE OIL

ELECTRICAL SUBSTATION WITH OIL
CAPACITY >55 GALLON

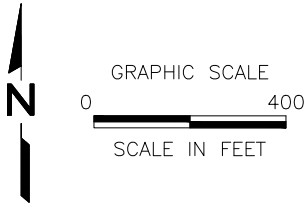
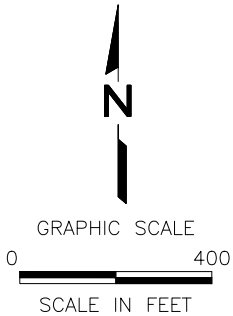


IMAGE SOURCE: GOOGLE EARTH

CLIENT:		SENTINEL PEAK RESOURCES	
SCS ENGINEERS ENVIRONMENTAL CONSULTANTS		PROJECT TITLE: INGLEWOOD OIL FIELD SITE LOCATION MAP LOS ANGELES COUNTY, CALIFORNIA	
DATE:	05-23-2025	FIGURE NO. 4	
SCALE:	1"=400'	PROJECT TITLE: PACKARD, LAI (A), UPPER AND LOWER WATER PLANT, AND BC TANK	
FIGURE NO.		SHEET TITLE:	
FIGURE NO.		NO.	
FIGURE NO.		REVISION	
FIGURE NO.		DATE	

C:\Users\2747r_r\Desktop\My Stuff\SCSer's\ES GROUP\E. Ortenberg\2025 SPR FIGURES\01-DWG\SPR Inglewood Figures.dwg Jun 27, 2025 - 11:56am By: raulramirez



LEGEND

FIGURE 11 - LAI (B) TANK SYSTEM

FIGURE 11 - LAI (B) TANK SYSTEM

SPILL CONTAINMENT CATCH BASIN

ABOVE GROUND STORAGE TANKS (AST)

55 GALLONS USED OIL FILTER

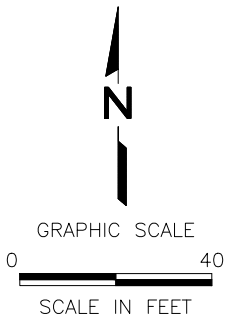
200 GALLON USED MOTOR OIL AST

2,000 GALLON UNLEADED GASOLINE AST

IMAGE SOURCE: GOOGLE EARTH

NO.				REVISION		DATE	
1	1	1	1	1	1	1	1
SHEET TITLE: LAI (B) TANK - VIEW 1				PROJECT TITLE: INGLEWOOD OIL FIELD SITE LOCATION MAP LOS ANGELES COUNTY, CALIFORNIA			
CLIENT: SENTINEL PEAK RESOURCES				SCS ENGINEERS ENVIRONMENTAL CONSULTANTS 3900 ALBERTA AVE., SUITE 300 LONG BEACH, CA 90806 PH: (562) 426-9544 FAX: (562) 427-0805			
DATE:	05-23-2025	SCALE:	1"=400'	FIGURE NO.	5	APPROVED BY:	EO
FIGURE NO.	5	SCALE:	1"=400'	FIGURE NO.	5	APPROVED BY:	EO

C:\Users\2747r-r\Desktop\My Stuff\SCSer's\ES GROUP\E. Ortenberg\2025 SPR FIGURES\01-DWG\SPR Inglewood Figures.dwg Jun 27, 2025 - 11:6am By: raulramirez



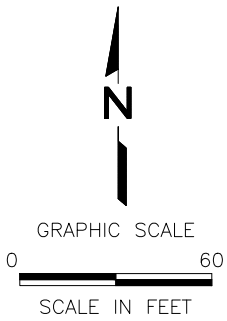
LEGEND

TVIC T-46 ABOVEGROUND STORAGE TANKS

IMAGE SOURCE: GOOGLE EARTH

DATE:				05-23-2025			
SCALE:				1"=40'			
FIGURE NO.				6			
SCS ENGINEERS ENVIRONMENTAL CONSULTANTS 3500 ALBERT AIRPORT WAY, SUITE 300 LONG BEACH, CA 90806 PH. (562) 426-9544 FAX. (562) 427-0805				PROJECT NO. 01219263.00			
DSN. BY:		RR		DWN. BY:		RR	
CHK. BY:		EO		APP. BY:		EO	
CLIENT:							
SHEET TITLE:				TVIC TANK SYSTEM			
PROJECT TITLE:				INGLEWOOD OIL FIELD SITE LOCATION MAP LOS ANGELES COUNTY, CALIFORNIA			
NO.				△			
REVISION							
DATE							

C:\Users\2747r-r\Desktop\My Stuff\SCSer's\ES GROUP\E. Ortenberg\2025 SPR FIGURES\01-DWG\SPR Inglewood Figures.dwg Jun 27, 2025 - 11:6am By: raulramirez



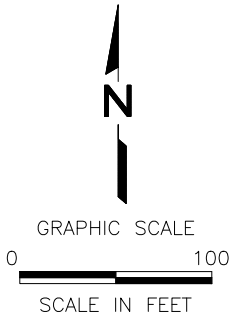
LEGEND

TVIC WP T-46 ABOVEGROUND STORAGE TANKS

DATE			
REVISION			
NO.			
SHEET TITLE: TVIC WATER PLANT SYSTEM			
PROJECT TITLE: INGLEWOOD OIL FIELD SITE LOCATION MAP LOS ANGELES COUNTY, CALIFORNIA			
CLIENT: SENTINEL PEAK RESOURCES			
SCS ENGINEERS ENVIRONMENTAL CONSULTANTS 3900 ALFREY AIRPORT WAY, SUITE 300 LONG BEACH, CA 90806 PH: (562) 426-9544 FAX: (562) 427-0805		DATE: 05-23-2025	SCALE: 1"=60'
FIG. NO. 01219263.00	DWG. BY: RR	CHEK. BY: EO	APP. BY: EO
FIGURE NO. 7			

IMAGE SOURCE: GOOGLE EARTH

C:\Users\2747r_r\Desktop\My Stuff\SCSer's\ES GROUP\E. Ortenberg\2025 SPR FIGURES\01-DWG\SPR Ingewood Figures.dwg Jun 27, 2025 - 11:6am By: raulramirez



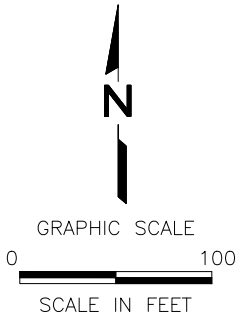
LEGEND

- PKD T-51** ABOVEGROUND STORAGE TANKS
- ELECTRICAL SUBSTATION WITH OIL CAPACITY >55 GALLON
- NON-CRUDE STORAGE TANK AREA

IMAGE SOURCE: GOOGLE EARTH

DATE: 05-23-2025		NO.		REVISION		DATE	
SCALE: 1"=100'		SHEET TITLE:		PROJECT TITLE:			
		PACKARD TANK		INGLEWOOD OIL FIELD SITE LOCATION MAP LOS ANGELES COUNTY, CALIFORNIA			
FIGURE NO. 8		CLIENT:					
		SCS ENGINEERS ENVIRONMENTAL CONSULTANTS 3900 ALBERTA AVE., SUITE 300 LONG BEACH, CA 90806 PH: (562) 426-9544 FAX: (562) 427-0805					
PROJ. NO. 01219263.00		DATE 05-23-2025	DWG. BY RR	CHECK BY EO	APP. BY EO	SCALE 1"=100'	

C:\Users\2747r_r\Desktop\My Stuff\SCS\er's\ES GROUP\E. Ortenberg\2025 SPR FIGURES\01-DWG\SPR Inglewood Figures.dwg Jun 27, 2025 - 11:56am By: raulramirez



LEGEND


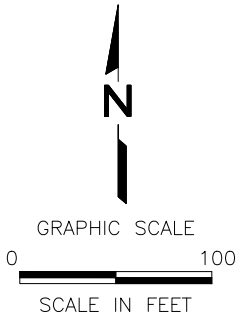
- LWP T-2A** ABOVEGROUND STORAGE TANKS
-  SPILL CONTAINMENT CATCH BASIN

IMAGE SOURCE: GOOGLE EARTH

SCS ENGINEERS ENVIRONMENTAL CONSULTANTS 3900 KILROY AVENUE, SUITE 300 LONG BEACH, CA 90806 PH. (562) 426-9544 FAX. (562) 427-9805				CLIENT:				SHEET TITLE: LAI (A) AND UPPER/LOWER WATER PLANT TANK		NO.		REVISION		DATE	
DATE: 05-23-2025				SCALE: 1"=100'		FIGURE NO. 9		PROJECT TITLE: INGLEWOOD OIL FIELD SITE LOCATION MAP LOS ANGELES COUNTY, CALIFORNIA							
PROD. NO. 01219263.00				DWN. BY: RR		ACAD FILE:									
DSN. BY: RR				CHK. BY: EO		APP. BY: EO									

C:\Users\2747r_r\Desktop\My Stuff\SCSer's\ES GROUP\E. Ortenberg\2025 SPR FIGURES\01-DWG\SPR Inglewood Figures.dwg Jun 27, 2025 - 11:6am By: raulramirez



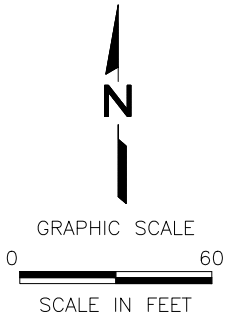
LEGEND

BC T-24 ABOVEGROUND STORAGE TANKS

IMAGE SOURCE: GOOGLE EARTH

SCS ENGINEERS ENVIRONMENTAL CONSULTANTS 3900 ALFREY AIRPORT WAY, SUITE 300 LONG BEACH, CA 90806 PH: (562) 426-9544 FAX: (562) 427-0805						CLIENT:		SHEET TITLE: BC TANK AREA		NO.		REVISION		DATE	
DATE: 05-23-2025										△					
SCALE: 1"=100'										△					
FIGURE NO. 10										△					
PROJ. NO. 01219263.00				DWN. BY: RR		ACAD FILE:				△					
DSN. BY: RR				CHK. BY: EO		APP. BY: EO				△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					
										△					

C:\Users\2747r_r\Desktop\My Stuff\SCSer's\ES GROUP\E. Ortenberg\2025 SPR FIGURES\01-DWG\SPR Inglewood Figures.dwg Jun 27, 2025 - 11:6am By: raulramirez



LEGEND

- LAI (B)-1 T-36
- ABOVEGROUND STORAGE TANKS
-
- SPILL CONTAINMENT CATCH BASIN

SCS ENGINEERS
ENVIRONMENTAL CONSULTANTS

3900 ALFREY AIRPORT WAY, SUITE 300
LONG BEACH, CA 90806
PH: (562) 426-9544 FAX: (562) 427-0805

PROJ. NO. 01219263.00

DRAWN BY: RR

CHECK BY: EO

DATE: 05-23-2025

SCALE: 1"=60'

FIGURE NO. 11

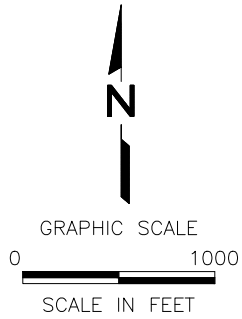
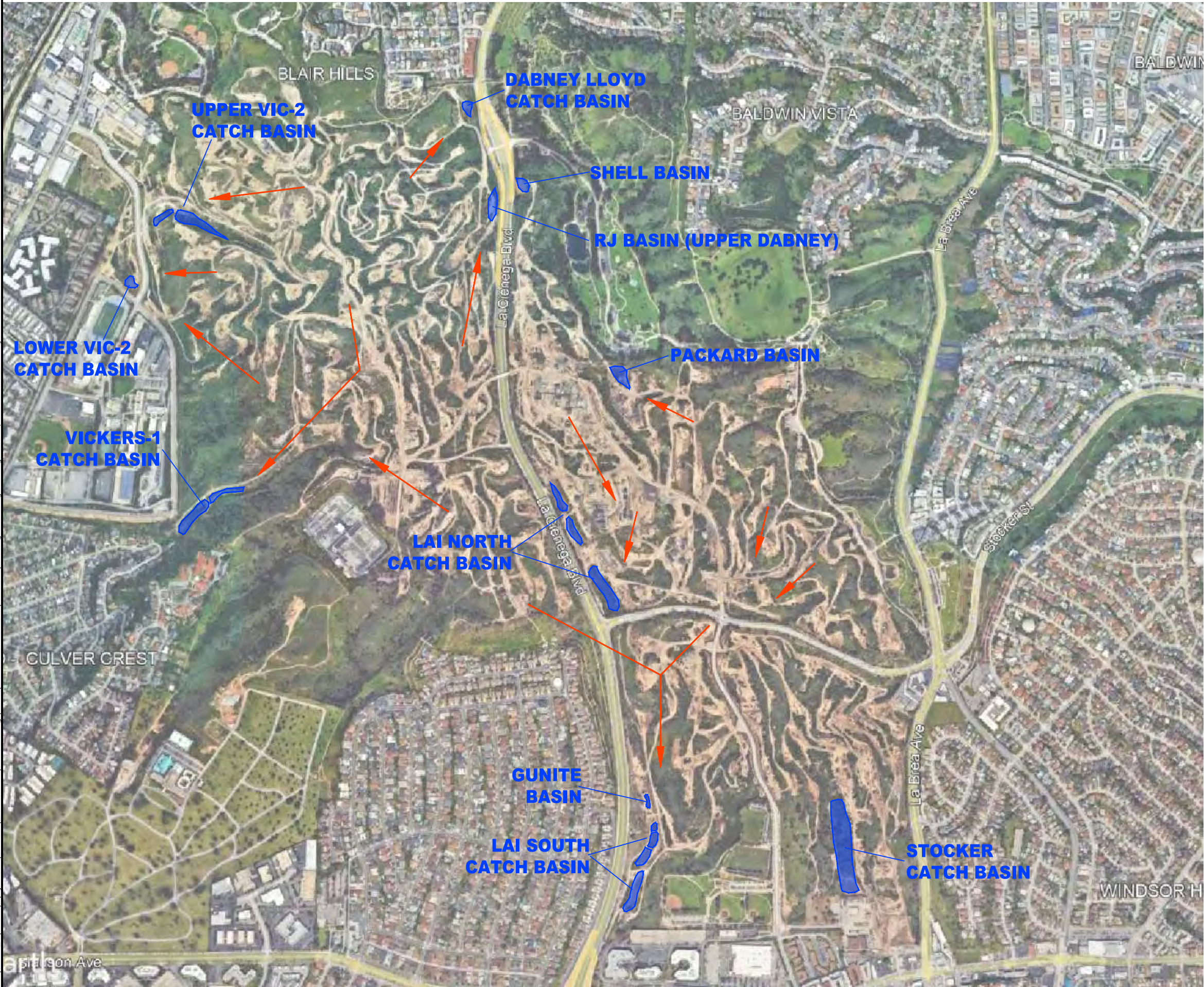
CLIENT:

SHEET TITLE: LAI (B) TANK - VIEW 2



PROJECT TITLE: INGLEWOOD OIL FIELD SITE LOCATION MAP
LOS ANGELES COUNTY, CALIFORNIA

NO.	REVISION	DATE
1		
2		
3		
4		
5		

C:\Users\2747r_r\Desktop\Wyr_Stuff\SCSer's\ES GROUP\E. Ortenberg\2025 SPR FIGURES\01-DWG\SPR Inglewood Figures.dwg Jun 27, 2025 - 11:56am By: raulramirez



LEGEND

-  FLOW DIRECTION
-  SPILL CONTAINMENT CATCH BASIN

SCS ENGINEERS ENVIRONMENTAL CONSULTANTS 3900 ALBERT AIRPORT WAY, SUITE 300 LONG BEACH, CA 90806 PH: (562) 426-9544 FAX: (562) 427-0805		DATE:		05-23-2025	
		SCALE:		1"=1000'	
FIGURE NO. 12		PROJ. NO. 01219263.00		OWN. BY: RR	ACAD FILE
		DSN. BY:	RR	CHK. BY: EO	APP. BY: EO
CLIENT:					
SHEET TITLE:		GROUNDWATER FLOW			
PROJECT TITLE:		INGLEWOOD OIL FIELD SITE LOCATION MAP LOS ANGELES COUNTY, CALIFORNIA			
NO.		△		REVISION	
DATE		△			
		△			
		△			
		△			
		△			
		△			
		△			

IMAGE SOURCE: GOOGLE EARTH



**SECTION 1 – Notification Procedure
(14 CCR § 817.04(g))**

Date	October 2023
Page	1 of 4
Rev 0	Approved by JS

1.1 Qualified Individuals (14 CCR § 817.04(g)(1)(A))

TITLE	NAME	OFFICE	MOBILE
Primary QI All Locations	Tom Cruise	661-395-5203	661-212-4534

Los Angeles Basin Facilities

TITLE	NAME	OFFICE	MOBILE
Qualified Individual (Q.I.)	Jim Bowen	323-298-2274	323-855-3201
Alternate Q.I.	Tyrone King	562-665-9250	562-665-9250
Alternate Q.I.	Michael Fernandez	323- 298-2276	323-855-1001
Alternate Q.I.	Johnny Simpson	661-395-5531	661-316-7387

1.2 Oil Spill Response Organization (14 CCR § 817.04(g)(1)(B))

Patriot Environmental	805-921-1112	<i>Notifications must be made within 30 min. of discovery of oil spill.</i>
MSRC (Marine Spill Response Corporation)	800-259-6772	<i>Notifications must be made within 30 min. of discovery of oil spill.</i>

1.3 Designated Spill Management Team (14 CCR § 817.04(h)(1)(C))

Witt O'Brien's	800-730-7611 714-577-2111 985-781-0804 (24 Hour)	<i>As soon as possible</i>
----------------	--	----------------------------

1.4 California Governor's Office of Emergency Services (14 CCR § 817.04(g)(1)(D))

California Office of Emergency Services (Cal OES)	(800) 852-7550 (<i>Inside CA</i>) (916) 845-8911 (<i>Outside CA</i>) (916) 845-8910 (Fax)	<i>Notifications must be made within 30 min. of discovery of oil spill.</i>
---	---	---

1.5 US Coast Guard National Response Center (14 CCR § 817.04(g)(1)(E))

National Response Center	(800) 424-8802 (Alt. (202) 267-2675)	<i>Notifications must be made within 30 min. of discovery of oil spill.</i>
--------------------------	---	---

1.6 Oiled Wildlife Care Network (OWCN) (14 CCR § 817.04(g)(1)(F))

Oiled Wildlife Care Network (OWCN)	(877) 823-6926	<i>As soon as possible</i>
---------------------------------------	----------------	----------------------------

1.7 Calls Initiated Timeframe (14 CCR § 817.04(g)(2)(A-B))

All calls to contacts listed above, shall be initiated immediately, but no longer than thirty (30) minutes after discovery of a discharge of oil or threatened discharge of oil. All notifications shall be completed as promptly as possible, but no later than two hours after the first call.

If there is oiled wildlife or a treat to wildlife, there shall be immediate notification to the Oiled Wildlife Care Network.



Inland Facility Plan

SECTION 1 – Notification Procedure (14 CCR § 817.04(g))

Date	October 2023
Page	2 of 4
Rev 0	Approved by JS

1.8 Initial QI Contact (14 CCR § 817.04(g)(3))

Sentinel Peak Resources California LLC acknowledges that Initial contact with the QI does not relieve the owner or operator from making timely notifications.

1.9 Immediate Notification Phone Numbers (14 CCR § 817.04(g)(4))

All Numbers are provided above in Section 1.1 – 1.6.

1.10 Additional Call Out Procedures (14 CCR § 817.04(g)(5))

Additional Regulatory Agencies

Agency	Phone Numbers	
CalGEM	562-637-4400	<i>Initial Notification made to CalOES within 30 minutes. District Office request a call promptly, following initial notifications.</i>
L.A. County Fire Department Health & Haz Mat Division (CUPA) Los Angeles, CA	7 AM – 5 PM 323-890-4045 After 5 PM 323-881-2411 (L.A. Co. Dispatch)	

Additional Resources

Agency	Phone Numbers	
Ancon Marine - OSRO	310-522-5110	<i>Notifications will be made within 24 hour of discovery of oil spill, if determination for additional resources are necessary.</i>
CTEH (Center for Toxicology & Environmental Health) – air monitoring	866-869-2834	<i>Notifications will be made within 24 hour of discovery of oil spill, if determination for additional resources are necessary.</i>
Poison Control Center	800-222-1222	<i>Notifications will be made within 24 hour of discovery of oil spill, if determination for additional resources are necessary.</i>
SUNBELT RENTALS	(714) 994-6360 https://www.sunbeltrentals.com/locations/335/	<i>Notifications will be made within 24 hour of discovery of oil spill, if determination for additional resources are necessary.</i>



Inland Facility Plan

SECTION 1 – Notification Procedure (14 CCR § 817.04(g))

Date	October 2023
Page	3 of 4
Rev 0	Approved by JS

1.11 Spill Notification Procedure (14 CCR § 817.04(g)(6)(A-K))

(A) Reporting Party		(B) Suspected Responsible Party	
Name:		Name:	
Phones:		Phones:	
Company:		Company:	
Position:		Organization Type:	
Address:		Private Citizen:	
		Private Enterprise:	
		Public Utility:	
City:		Local Government:	
State:		State Government:	
Zip:		Federal Government:	
Were Materials Discharged (Y/N)?		City:	State:
			Zip:
		Calling for Responsible Party (Y/N)?	
Incident Description			
Source and/or Cause of Incident:			
Date:		Time:	
Facility Name:		Incident Address/Location:	
Nearest City:			
Size and Appearance of Slick:			
Prevailing Weather:			
Storage Tank Container Type: Above Ground (Y/N)?		Below Ground (Y/N)?	Unknown
Facility Capacity			
Tank Capacity:			
Latitude Degrees:			
Longitude Degrees:			
Materials			
Discharge Unit of Quantity:		Discharged Material:	
Measure:		Quantity in Water:	
Response Action			
Actions Taken to Correct or Mitigate Incident:			
Impact			
Number of Injuries:		Number of Fatalities:	
Evacuations Necessary (Y/N/U)?		Number Evacuated:	
Damage (Y/N/U)?		Damage in Dollars:	
Caller Notifications			
USCG	OES	OSRO	QI

*It is not necessary to wait for all information before calling the **National Response Center:**

1-800-424-8802.

If emergency services are needed before police, fire, and EMS arrive; and fire extinguishers are located on tank trucks and in the main office.

**SECTION 1 – Notification Procedure
(14 CCR § 817.04(g))**

Date	October 2023
Page	4 of 4
Rev 0	Approved by JS

1.12 Notification Delay (14 CCR § 817.04(g)(7))

Do not delay notifications / reporting if all information is not available. If you are uncertain regarding any information, do not speculate (particularly with reference to cause). Also, it is inappropriate to estimate damages in dollars at this stage of the response. The NRC will issue a report number; be sure to record it.

1.13 Spill Volume Updates (14 CCR § 817.04(g)(8))

An updated estimate of the volume of oil spilled and the volume at immediate risk of spillage shall be reported to the California Governor's Office of Emergency Services whenever a significant change in the amount occurs, but not less than every twelve (12) hours within the first forty-eight (48) hours of response. The State Incident Commander and/or the Federal On-Scene Coordinator, through the Unified Command, shall have the option of increasing or decreasing this timeframe, as needed. Updated spill volume information included in the Incident Action Plan developed through the Unified Command will meet the requirements of this subsection.



Inland Facility Plan

SECTION 3 – Spill Protection Measures (14 CCR § 817.04(i))

Date	October 2023
Page	1 of 1
Rev 0	Approved by JS

3.1 Testing Maintaining and Inspecting Equipment (14 CCR § 817.04(i)(1)(A))

Company maintains only minor spill control expendables such as sorbent and relies on the response organization for major spill response equipment. In selecting the response organization, Company has verified that appropriate equipment testing, inspection and data recording programs are in-place. Continuance of these response organization programs will be verified at the time of any contract renewal.

An inspection schedule will be provided in the event that Company acquires any significant response equipment.

Company will ensure that all equipment operated by its primary response contractor is properly maintained. This will be done through inspection of the periodic maintenance and inspection records maintained by Sentinel Peak Resources California, LLC's OSRO.

Schedules, methods, and procedures for equipment maintenance and inspection can be provided by Company, through OSRO, upon request.

3.2 Methods & Procedures to Reduce Spills (14 CCR § 817.04(i)(1)(B))

Discharge prevention measures are those steps or procedures taken to minimize the potential for a discharge of oil products. This includes evaluation of the following:

- Field operations staff work 7 days a week and each tank battery and operating lease is visited daily as operators make their rounds. This lends to discharge prevention both in terms of visually observing the condition of the tankage itself, but also observation of the containment berming. Operators are trained in good management practices to remain attentive to measures to prevent spills and discharges.
- SPR actively measures tank wall thickness for its operational vessels as a means of tracking trends in tank wall thickness. Vessel walls deemed to be deteriorating are scheduled for repair / replacement.
- There are no underground storage tanks on any of the sites. All oil products with a volume of 55 gallons or greater are stored in above ground tanks, totes or drums. All oil storage containers are constructed of either steel or plastic, which are appropriate materials for the contents of each container.
- Crude oil containers are protected from corrosion by not being direct in contact with soil and through the introduction of corrosion inhibitors into the fluid streams themselves.

3.3 Additional Relevant Information (14 CCR § 817.04(i)(2))

Additional relevant information can be provided upon request.