

Communication from Public

Name: Pico Robertson Health and Safety Coalition

Date Submitted: 05/06/2022 11:02 AM

Council File No: 21-1025

Comments for Public Posting: Please see the attached cover note and appended documents from CalGEM (State oil well regulator) and PCEC (operator of West Pico Drill Site) concerning responses to the underground pipeline leak and spill at the West Pico Drill Site. The documents in this installment cover responses in January 2022 and reveal continuing violations that stretch from 2001 to the present day. Subsequent submissions to this Council File will provide documents from CalGEM and PCEC dating from February, March, and April that further substantiate these violations and their continuing environmental impact.

Cover Note from Pico Robertson Coalition with appended documents on the West Pico Drill Site Pipeline Leak and Spill: Documents from PCEC and CalGEM, December 2021 to January 2022.

In response to the pipeline leak and spill discovered on December 11, 2021, the State oil well regulator CalGEM issued a Notice of Violation (NOV) on December 14, 2021 citing the oil company, PCEC, for multiple violations.

Among other ordered actions, the NOV required PCEC to prepare “a root cause analysis and action taken to prevent future occurrence [that] must also be provided to CalGEM by January 11, 2022.”

This cover note and the documents from PCEC and CalGEM that are appended to it concern PCEC’s failure to fulfill CalGEM’s order for the “Root Cause” report through the end of January, 2022.

To this day, May 6, 2022, PCEC has still not complied with CalGEM’s order in substantial and consequential ways. Additional documents from March and April 2022 will be provided in subsequent submissions to this Council File.

The documents appended to this cover note were obtained from CalGEM through Public Record Act requests on February 8, 2022. The next day they were shared with the Office of the Zoning Administrator.

Most of the documents are email communications between PCEC and CalGEM. Many of the emails are in chains of email communications, so there is some duplication in the email records appended below.

The documents are generally organized in reverse chronological order.

- The topmost document is a January 27, 2022 letter sent by email from PCEC to CalGEM providing a requested schedule for completing the tasks ordered by CalGEM.
- Then there is an email chain that stretched from January 7 (when PCEC requested more time to produce the “Root Cause” report) through January 26. On January 10 (see next bullet point) PCEC submitted a very incomplete “Root Cause” report and on January 26 PCEC and CalGEM had a meeting to discuss the many missing elements. The January 26 email from CalGEM to PCEC summarizes what was discussed at the meeting.
- On January 10 PCEC submitted a short and very incomplete “Root Cause” report.
- For convenient reference, we are including a copy of CalGEM’s December 14, 2021 Notice of Violation (NOV) issued to PCEC, which required submission of the “Root Cause” report by January 11, 2022.

Key Points to Note from the Appended Documents:

- PCEC still had not supplied CalGEM with a site plan showing the path of the pipeline that leaked more than a month after the spill revealed the existence of the underlying sub-surface pipeline leak.
 - Federally and State required Spill Prevention Control and Countermeasure Plans (SPCCP) and State required Pipeline Management Plans (PMP) must by law show all pipelines on site plans. But the SPCCPs and PMPs for the West Pico Drill Site did not show the pipeline that leaked (we have obtained these documents from CalGEM but they are too large to post on the Council File system through the public comment web portal).
- The leak and spill were caused by Code violations cited in the CalGEM NOV, namely improper and illegal use of the slip blinds AND failure to properly abandon the pipeline. Hence the leak and spill were caused by a sequence of two predictable failures: 1st the slip blind corroded, allowing pressurized corrosive fluid to flow into an out-of-service pipeline, and 2nd the pipeline had or developed its own leak.
 - PCEC identified the slip blind cause of the problem in less than one day after the spill reached the surface.
 - But, as of January 27 (and to this day, to the best of our knowledge from records that have been released) PCEC has not tried to investigate the pipeline failure.
- The pipeline failure could and should be given preliminary investigation by sending a video camera down the pipeline. This could:
 - identify the leak point or points
 - obtain images that show the size of the leak (large? small? singular? Multiple?)
 - obtain images that show the nature of the leak (from corrosion? from kinetic damage to the pipeline? from improper capping of the pipeline terminus?)
 - identify the actual present day terminus of the pipeline
- As you will see when later documents from March and April are submitted to the Council File, locating the leak point and its nature and cause is significant for estimating the size of the sub-surface leak, estimating its lateral spread, and estimating the location and size of excavations necessary to perform the pipeline abandonment and sub-surface clean-up ordered by CalGEM.
 - Please keep in mind that the sub-surface leak was necessarily larger than amount of fluid that emanated on the surface. The pipeline that leaked runs more than 6 feet below the surface. The leak needed to saturate the soil and build enough pressure to push fluid upwards to the surface, and maybe also laterally an unknown distance.
 - The surface spill was in the City owned alley, but the leak point on the pipeline could be under the West Pico Drill Site compound at 9101 W Pico, which has 25

foot tall perimeter walls, a 6,500 square foot support building, and a very thick concrete floor across the compound.

- The emanation point, size, and spread of the sub-surface spill could have major consequences for the clean-up. The end point of the pipeline could have major consequences for the pipeline abandonment. Excavation could require substantial demolition and reconstruction, with impact on the community.
- Last, please look at the photo of the open-air pipeline vault that PCEC attached to its January 10 “Root Cause” report.
 - The size of the vault and the easy visibility of the pipelines are significant.
 - This vault is where the illegal slip blinds were installed and were left in place for 20 years (duration admitted by PCEC in their testimony to LA County FD and in later communications with CalGEM and the City Zoning Administrator).
 - The slip blinds have protruding handles to aid in installation and removal because slip blinds are meant for short-term use to temporarily isolate a section of pipeline for maintenance work. Here is a photo of the slip blind that played a role in the leak and spill (photo from the CalGEM inspection report submitted to the Council File on 5/4/22) and an image from a slip blind manufacturer. The point is that the handle protrudes from the pipeline:



California
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Geologic Energy Management Division

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Figure 12. This picture shows the corroded blind slip that was the root cause of fluid entering the out of service pipeline that is buried near surface expression of the leak in the alley.



- For 20 years the protruding handles of the slip blinds stuck out from the pipelines in the large open-air vault shown in the photo PCEC attached to its January 10 “Root Cause” report. The protruding handles were red flags that the drill site operator and crew ignored for 20 years.
- Federal, State, and City pipeline and facility regulations require that the operator train its crew to know all spill prevention and pipeline safety regulations, and to regularly monitor all components for signs of needed repair in order to prevent leaks and spills. These requirements are in Federal and State Codes and in the Pipeline Management Plans and Spill Prevention Control and Countermeasure Plans required by Federal, State, and City regulations.
- The “Root Cause” report was required to address future prevention, but there has to this day been no analysis of why pipeline safety requirements were ignored for so long and no analysis of what must be done to prevent a reoccurrence.

Negligence and non-compliance at the West Pico Drill Site have been rampant for more than 20 years.

Negligence and non-compliance dramatically increase the risk of environmental impact and have caused actual environmental impact at the West Pico Drill Site.

Had the Zoning Administrator conducted required reviews in 2010-11 and 2015-16, and had the Zoning Administrator conducted a full and proper review in 2020-21 with proper Environmental Review (as required by CEQA and Condition 78 and the track record of non-compliance), then perhaps the leak and spill could have been avoided.

The Zoning Administrator’s granting of a Categorical Exemption from Environmental Review was wrong and contrary to law in multiple ways. And it was sadly consequential.

City Council should grant NASE’s appeal and overturn the improper Categorical Exemption.



January 27, 2022

VIA EMAIL

Grace Brandt
Environmental and Facilities
Department of Conservation
California Geologic Energy Management Division
3780 Kilroy Airport Way, Suite 400,
Long Beach, CA 90806

**Re: SPILL/INCIDENT, PACIFIC COAST ENERGY COMPANY LEASE, BEVERLY HILLS FIELD
VIOLATION I.D. 12242781**

Further to our discussion of yesterday January 26th, the following is a status update and forecasted timeline through to completion of the project.

As previously reported, the out of service pipelines have been permanently isolated from the facility by removing sections of pipework inside the facility and installing blind flanges.

The next phase of the project comprises;

- Excavation of the public thoroughfare in the vicinity of the leak to expose the ends of the out of service pipelines
- Cleanup of “spilled fluids and all impacted media including surface and subsurface”
- Permanent abandonment of the out of service pipelines to standards specified in CCR section 1776f

To that end PCEC has engaged an approved contractor to carry out the work scope. As the excavation will be in a public thoroughfare a permit is required from LA City. Our contractor has made the permit application and is being advised that the timeframe to issuance of the permit is 30-45 days. Therefore, we anticipate that excavation work will be able to commence during the week of Monday February 28th. PCEC will notify CalGEM at least two business days ahead of the date the pipeline ends will be exposed for inspection.

In the meantime, PCEC are working on supplementing the information provided in the “Root Cause Analysis” submitted January 10th, in line with the email request of January 26th.

If you require any further information, please do not hesitate to contact me.

Sincerely,

Phil Brown,
Agent – Pacific Coast Energy Company

Pacific Coast Energy Company LP
1555 Orcutt Hill Road Orcutt, California 93455 Phone (805) 937-2576

From: [Philip Brown](#)
To: [Tafi, Neda@DOC](mailto:Tafi,Neda@DOC)
Cc: [Brandt, Grace@DOC](mailto:Brandt,Grace@DOC)
Subject: RE: Pacific Coast Energy Company Lease, Beverly Hills Field West Violation I.D. 12242781
Date: Wednesday, January 26, 2022 9:13:04 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Thanks you Neda,

We will get right on it.

Regards Phil.

From: Tafi, Neda@DOC <Neda.Tafi@conservation.ca.gov>
Sent: Wednesday, January 26, 2022 8:55 AM
To: Philip Brown <philip.brown@pceclp.com>
Cc: Brandt, Grace@DOC <Grace.Brandt@conservation.ca.gov>
Subject: FW: Pacific Coast Energy Company Lease, Beverly Hills Field West Violation I.D. 12242781

Good morning Philip,

To summarize our discussion in today's meeting regarding root cause analysis report, the following are the list the of the information that need to be provided in the report:

1. Lab analysis- corrosion assessment and failure mechanism (slip blind- failed pipeline)
2. Subsurface clean up report with photos
3. Pipelines diagram (PFD/P&ID) showing all pipelines between the production facilities and drill site and identifying the abandoned one
4. Pressures drop history (if any)- flowline PCEC0225
5. Visual inspection records- flowline PCEC0225
6. Leak history (if any)
7. Lat. and long. for the start point and endpoint of the abandoned pipeline
8. To prevent reoccurrence: Check/ensure all abandoned pipelines have been appropriately abandoned (list the pipelines)

Please let me know if you have any questions.

Best Regards,



Neda Tafi

Associate Oil and Gas Engineer
Pipeline and Facilities Program
Geologic Energy Management
Southern District

California Department of Conservation
3780 Kilroy Airport Way, Suite 400,
Long Beach, CA 90806
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Cell: (213) 518-1957
E: neda.tafi@conservation.ca.gov



From: Philip Brown <philip.brown@pceclp.com>
Sent: Tuesday, January 25, 2022 7:43 PM
To: Brandt, Grace@DOC <Grace.Brandt@conservation.ca.gov>
Cc: Tafi, Neda@DOC <Neda.Tafi@conservation.ca.gov>
Subject: Re: Pacific Coast Energy Company Lease, Beverly Hills Field West Violation I.D. 12242781

Thanks for getting back to me so quickly, shall I just call your direct number?
Regards Phil

Sent from my iPhone

On Jan 25, 2022, at 5:59 PM, Brandt, Grace@DOC
<Grace.Brandt@conservation.ca.gov> wrote:

I'm available tomorrow morning between 8:00 to 8:30.

Grace P. Brandt

Environmental and Facilities Unit Supervisor
California Geologic Energy Management Division
Southern District – Long Beach
D: (562) 637-1160
M: (714) 822-0970
Email: Grace.Brandt@conservation.ca.gov

From: Philip Brown <philip.brown@pceclp.com>
Sent: Tuesday, January 25, 2022 5:27 PM
To: Brandt, Grace@DOC <Grace.Brandt@conservation.ca.gov>
Cc: Tafi, Neda@DOC <Neda.Tafi@conservation.ca.gov>
Subject: RE: Pacific Coast Energy Company Lease, Beverly Hills Field West Violation I.D. 12242781

Hello Ms Brandt,

Rick Clark is no longer working for our company, he retired mid-January.

We will have a new EHS Manager in place on Monday February 3rd, in the meantime I will be dealing with Rick's outstanding workload.

We submitted the root cause analysis on January 11th, please see attached above with two attachments to the document.

Also, we submitted a request for an extension to the deadline on January 7th (also attached above)

Would you be available for a quick call tomorrow to discuss?

Regards Phil Brown

From: Brandt, Grace@DOC <Grace.Brandt@conservation.ca.gov>
Sent: Friday, January 21, 2022 10:21 AM
To: Rick Clark <rick.clark@pceclp.com>
Cc: Philip Brown <philip.brown@pceclp.com>; Pat Vigeant <pvigeant@pceclp.com>; Tafi, Neda@DOC <Neda.Tafi@conservation.ca.gov>
Subject: RE: Pacific Coast Energy Company Lease, Beverly Hills Field West Violation I.D. 12242781

Mr. Clark,

Per Notice of Violation dated December 14, 2021, "Spilled fluid and all impacted media, including surface and subsurface, must be cleaned-up. The pipeline must be abandoned to the standards specified in CCR section 1776(f). Additionally, a root cause analysis and action taken to prevent future occurrence must also be provided to CalGEM by January 11, 2022." Please let CalGEM know which of the above-mentioned activities has been completed and what are pending by close of business Monday, January 24, 2022.

Please notify CalGEM in two business day in advance once the leak area has been exposed for an inspection. Thank you.

Grace P. Brandt

Environmental and Facilities Unit Supervisor
California Geologic Energy Management Division
Southern District – Long Beach
D: (562) 637-1160
M: (714) 822-0970
Email: Grace.Brandt@conservation.ca.gov

From: Rick Clark <rick.clark@pceclp.com>
Sent: Friday, January 7, 2022 11:27 AM
To: Brandt, Grace@DOC <Grace.Brandt@conservation.ca.gov>
Cc: Philip Brown <philip.brown@pceclp.com>; Pat Vigeant <pvigeant@pceclp.com>
Subject: FW: Pacific Coast Energy Company Lease, Beverly Hills Field West Violation I.D. 12242781

Good morning Grace,
Could you review PCEC's request for an extension of the deadline for NOV I.D. 12242781?

Please contact me with any questions,
Thank you Rick

From: Rick Clark
Sent: Friday, January 7, 2022 11:24 AM
To: Tafi, Neda@DOC <Neda.Tafi@conservation.ca.gov>
Cc: Philip Brown <philip.brown@pceclp.com>; Pat Vigeant <pvigeant@pceclp.com>
Subject: Pacific Coast Energy Company Lease, Beverly Hills Field West Violation I.D. 12242781

Good morning Neda,
Please review attached request to extend the deadline to complete work at our West Pico Facility to satisfy Violation I.D. 12242781.
A root cause report will be completed prior to the deadline and submitted for review to you.

Please let me know if you require additional information,

Thank you,
Rick

Rick Clark
Pacific Coast Energy Company
1555 Orcutt Hill Road
Orcutt, CA 93455
Office: (805)937-2576 Ext. 3246
Cell: (805)406-4499
rick.clark@pceclp.com
<image001.png>

From: [Rick Clark](#)
To: [Brandt, Grace@DOC](#); [Tafi, Neda@DOC](#)
Cc: [Philip Brown](#); [Pat Vigeant](#)
Subject: Spill/Incident, Pacific Coast Energy Company Lease, Beverly Hills Field - Violation I.D. 12242781
Date: Monday, January 10, 2022 2:31:55 PM
Attachments: [image001.png](#)
[Pacific Coast Energy Company Lease, Beverly Hills Field - Violation I.D. 12242781 Incident Root Cause Analysis.pdf](#)
[PCEC - West Pico Facility - NOV 12242781 - WellSTAR Pipeline I.D.90324914.pdf](#)

Please review the attached incident root cause analysis regarding violation I.D. 12242781 that occurred on December 11, 2021 at the PCEC Beverly Hills Field – West Pico Facility.

If any additional information is required, please contact Phil Brown – CalGEM agent.

Thank you

Rick Clark
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1555 Orcutt Hill Road
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rick.clark@pceclp.com





January 10, 2022

VIA EMAIL

Grace Brandt
Environmental and Facilities
Department of Conservation
California Geologic Energy Management Division
3780 Kilroy Airport Way, Suite 400,
Long Beach CA 90806

Re: SPILL/INCIDENT, PACIFIC COAST ENERGY COMPANY LEASE, BEVERLY HILLS FIELD VIOLATION I.D. 12242781

December 11, 2021 Incident Root Cause Analysis:

A pipeline isolation device (slip blind) placed between two pipe flanges for isolating the process flow pipeline #PCEC0225 to an out of service pipeline (WellSTAR #PCEC90324914) experienced internal corrosion of the metal (see attached picture) causing ~ 15 gallons of crude oil and produced water to leak out of containment next to the West Pico Facility from pipeline # PCEC90324914.

Action and Prevention Measures:

At the time of the incident, West Pico Facility was shut down to prevent any further discharge of fluids.

Operations conducted a thorough inspection of all pipelines within West Pico Facility and discovered the source of the fluid discharge. During inspection, Operations discovered an additional out of service pipeline traveling parallel to pipeline #90324914 connected to pipeline #PCEC0225 with a similar isolation device (slip blind) installed between two flanges.

Both slip blinds were removed and inspected revealing the cause of the incident on one of the isolation devices attached to pipeline # 90324914.

The inspection concluded that the remainder of pipelines between and within the facilities could not discharge out of containment per design – subsurface pipelines were placed within conduits not direct burial, in the event of a release the fluid would flow to designated storage areas contained within the facilities.

Prior to returning West Pico Facility to service, pipeline # 90324914 and the adjacent pipeline had sections of pipe removed and blank flanges installed on pipeline #PCEC0225 to permanently isolate and prevent future occurrences from these out of service pipelines. (see attached picture).

Grace Brandt
Environmental and Facilities
Department of Conservation
California Geologic Energy Management Division
3780 Kilroy Airport Way, Suite 400,
Long Beach CA 90806

**Re: SPILL/INCIDENT, PACIFIC COAST ENERGY COMPANY LEASE, BEVERLY HILLS FIELD
VIOLATION I.D. 12242781**

Action and Prevention Measures:

CalGEM Inspector Joe Anthansious confirmed and approved of this action taken to isolate these pipelines from pipeline # PCEC0225.

PCEC is in the process of initiating a plan to excavate impacted material and permanently isolate pipeline #90324914 and an adjacent out of service pipeline from the West Pico Facility where incident occurred.

Please contact me if you require additional information,

Sincerely,



Phil Brown
Agent – Pacific Coast Energy Company, LP





NOTICE OF VIOLATION

December 14, 2021

Violation I.D. 12242781

VIA EMAIL

Mr. Philip Brown, Agent
Pacific Coast Energy Company LP (B6127)
1555 Orcutt Hill Road
Orcutt, CA 93455
philip.brown@pceclp.com

Dear Mr. Brown:

SPILL/INCIDENT, PACIFIC COAST ENERGY COMPANY LEASE, BEVERLY HILLS FIELD

On December 11, 2021, California Geologic Energy Management Division (CalGEM) received notification from the Office of Emergency Services (Cal OES #21-7076) regarding a spill from a Pacific Coast Energy Company LP pipeline in the Beverly Hills field. This letter itemizes violation(s) of the California Code of Regulations, title 14 (CCR).

Maintenance of Production Facilities and Equipment: CCR section 1777 (a) states, "Operators shall maintain production facilities in good condition and in a manner to prevent leakage or corrosion and to safeguard life, health, property, and natural resources."

Out-of-Service Production Facility Requirements: CCR section 1773.5 (a) states in part that within "six months after the determination that a production facility is Out-of-Service, the following shall be required:

- (1) Out-of-Service production facilities shall have fluids, sludge, hydrocarbons, and solids removed and shall be disconnected from any pipelines and other in-service equipment.
- (6) Pipelines associated with Out-of-Service tanks and pressure vessels shall be removed or flushed, filled with an inert fluid, and blinded."

Well Site and Lease Restoration: CCR section 1776 (f) states that "Lease restoration shall include the removal of all tanks, above-ground pipelines, debris, and other facilities and equipment. Remaining buried pipelines shall be purged of oil and filled with an inert fluid. Toxic or hazardous materials shall be removed and disposed of in accordance with Department of Toxic Substances Control requirements".

Mr. Philip Brown, Agent
Pacific Coast Energy Company LP (B6127)
Violation I.D. 12242781
December 14, 2021

The subject violation is summarized in the table below:

Pipeline Description	Violation Description	Violation Number
WellSTAR Pipeline ID# 90324914	Pipeline leak	12242781

Spilled fluid and all impacted media, including surface and subsurface, must be cleaned-up. The pipeline must be abandoned to the standards specified in CCR section 1776(f). Additionally, a root cause analysis and action taken to prevent future occurrence must also be provided to CalGEM by January 11, 2022.

Pacific Coast Energy Company LP shall notify CalGEM during normal working hours (8:00 am to 5:00 pm) once the violations have been corrected for a re-inspection.

Failure to comply with the laws of California and CalGEM may result in enforcement action including, but not limited to, issuance of a civil penalty and/or order pursuant to Public Resources Code Sections 3106, 3224, 3235, 3236, and 3236.5.

If you have any questions, please contact Neda Tafi at (562) 637-4400 or neda.tafi@conservation.ca.gov.

Sincerely,

Grace P. Brandt Digitally signed by Grace P. Brandt
Date: 2021.12.14 13:04:12 -08'00'

Grace Brandt
Environmental and Facilities Unit Supervisor

cc: Los Angeles City Fire Department- [lafdcupa@lacity.org](mailto:lafdcpa@lacity.org)
Pipeline and Facilities Program File