

## Communication from Public

**Name:** Pico Robertson Health and Safety Coalition

**Date Submitted:** 03/13/2023 09:24 AM

**Council File No:** 21-1025

**Comments for Public Posting:** Please see the appended email sent to CD5 on March 3, 2023. THIS EMAIL DOCUMENTS TEN (10) MORE UNAPPROVED OIL WELL PROJECTS - "MAINTENANCE ACIDIZATION" - EXECUTED AT THE WEST PICO DRILL SITE FROM 2013 TO 2021. \* Two "maintenance acidization" projects were executed in October 2021, while NASE's CEQA appeal was open on City Council's desk. \* One "maintenance acidization" project was executed in July 2020, in between the two ZA public hearings on the review case (which were held July 9 and August 27, 2020). \* There is a stark pattern of open contempt for the law, the public, the ZA, and for City Council. \* What can one expect if the City will not enforce its Code and its obligations to implement CEQA? Until the City acts, the City will continue to invite this kind of noncompliance.

**Subject:** 10 More Unapproved/Prohibited Projects at West Pico, including "maintenance acidization" in July 2020 and Oct 2021

**From:**

**Date:** 3/3/2023, 3:14 PM

**To:** Katy Yaroslavsky <katy.yaroslavsky@lacity.org>, Gary Gero <gary.gero@lacity.org>, Kristen Pawling <kristen.pawling@lacity.org>

**CC:**

Dear Katy, Gary, and Kristen

We keep finding more.

PCEC's new pending project to rework the casing on well API 0403721035 is just the most recent oil well project initiated at West Pico without application to or even notification of the ZA. It is not the only unapproved oil well project initiated at West Pico while the CEQA appeal has been open on City Council's Desk, and the total number of unapproved projects keeps growing.

**In addition to all the other unapproved oil well projects we have previously documented, there have also been ten (10) "maintenance acidization" projects executed on wells at West Pico from 2013 through 2022, all without ZA reviews and approvals required by City Code and without CEQA clearance of any kind.**

**Two "maintenance acidization" projects were executed in October 2021, while NASE's CEQA appeal was open on City Council's desk.**

**One "maintenance acidization" project was executed in July 2020, in between the two ZA public hearings on the review case.**

**There is a stark pattern of open contempt for the law, the public, the ZA, and for City Council.**

- In October 2021, with NASE's CEQA appeal (CF21-1025) open on the desk of City Council, PCEC executed two oil well maintenance projects ("maintenance acidizing") on oil wells at West Pico.
- On July 28, 2020, in between the two public hearings held by the ZA in the PA2 review (1st on July 9 and 2nd on August 27, 2020), PCEC executed an oil well maintenance project ("maintenance acidizing") on an oil well at West Pico.
- Since 2013, when SCAQMD's Rule 1148.2 first required it, SCAQMD received notifications from PCEC of ten (10) "maintenance acidization" or "acidization" projects that were executed on oil wells at the West Pico Drill Site, including the two projects executed in October 2021 and the July 2020 project.
- The SCAQMD Notification forms have a required field for the oil company to indicate the presence of a "Sensitive Receptor" (e.g., homes, schools, etc) within 1,500 feet of the oil well. On the Notifications for the last seven projects, from September 2016 to October 2021, PCEC failed to fill in this required field, in open disregard of the homes that are less than 100 feet from the Drill Site and a school that is less than 200 feet from the Drill Site.

#### **Documentation of the projects:**

An "Event Notification Search" on SCAQMD's Rule 1148.2 Oil and Gas Wells Activity Notification database ( <http://xappprod.aqmd.gov/r1148pubaccessportal/Home/Index> ) using the facility ID# 98158 as the search term produces a list of fifteen (15) Notifications for "maintenance acidizing" and "acidizing" projects from 2013 through 2021.

Five of the Notifications are for project Cancellations.

Ten (10) Notifications are for projects that were executed. Copies of those ten Notifications are attached to this email.

**Here are details on the three most recent "maintenance acidization" projects, executed in 2020 and 2021 during the course of the ZA review and the CEQA appeal case that is still pending in City Council:**

- PCEC submitted notice for a July 28, 2020 "maintenance acidizing project" on well API 0403721284. (note: date is for the project, not submission of the Notification)
- PCEC submitted notice for an October 11, 2021 "maintenance acidizing" project on well API 0403721284.
- PCEC submitted notice for an October 28, 2021 "maintenance acidizing" project on well API 0403726615.

On these and four more projects going back to September 2016, PCEC failed to fill out the "Sensitive Receptor" section of the Notification, showing disregard for the community and for regulations.

On all ten projects, PCEC disregarded the City Code requirement to apply to the ZA for approval, which also constitutes a CEQA violation since the required ZA review is discretionary and would trigger a CEQA case.

And PCEC was brazen enough to do this while the PA2 ZA case and CEQA appeal were open. They seem to have contempt for City law, CEQA, the City Council, the ZA, and the community.

#### **Pertinent City Code requirements and ZA processes in effect at the time, as explained recently by the Chief ZA:**

As the Chief ZA has recently written in [ZA-2022-8997-ZAI](#) (a Zoning Administrator Interpretation of City Code provisions

about "well maintenance"), at the time these projects were initiated the "Pertinent LAMC Section 13.01.H and Section 13.01.I" required ZA approval to undertake maintenance projects and expressly prohibited such projects if they did not have ZA approval in advance.

The Chief ZA noted that the Code did "not specify what activities might constitute a desire to 'maintain an oil well.'" The Chief ZA explained that, therefore, "In the past several decades the Zoning Administrator has reviewed and determined when a proposed scope of work at a drill site qualifies as a well maintenance project on a case by case basis."

- There were no applications to the ZA for any of these ten (10) oil well maintenance projects. The ZA did not review them and make a determination "on a case by case basis," as the Chief ZA claims the ZA had been doing. There was not even a review of the July 2020 project that was executed in between the two ZA public hearings, nor of the two projects executed in October 2021 when CEQA appeal was pending in City Council.
- Instead, just like when the West Pico Drill Site operator drilled a new well in 2005-06 without application to the ZA while the ZA had an open two-year post-"Modernization Project" checkup review open on his desk, during the course of the current review and CEQA appeal PCEC has continued to initiate well projects in violation of City Code and CEQA right under the City's nose.

**There is really no doubt that the "maintenance acidizing" projects executed by PCEC at West Pico constitute the kind of well maintenance that counted as projects to "maintain an oil well" under City Code throughout the time period. The Chief ZA says so in her Zoning Administrator Interpretation.**

- City Code did not change its definition of "maintain an oil well" between 2021 and today, and there is no reason to believe there has been a shift in the meaning of that term in the last two years in the eyes of the ZA.
- The Chief ZA cited a 2017 study of "routine maintenance acidizing projects" and declared that such projects have "potential negative external effects on community public health and on the environment." The Chief ZA maintained that the "Zoning Administrator's review" under LAMC 13.01.H and 13.01.I allows for the mitigation of a wide range "potential impacts" that these projects can have on the environment.
- *Even if there had been a shift in the meaning of the word "maintain an oil well," the Chief ZA's declaration about the process by which the ZA had for "decades" made determinations of "when a proposed scope of work at a drill site qualifies as a well maintenance project on a case by case basis" is the critical point because there was no such "case by case" review and determination for any of these projects.*

The Chief ZA further made it clear that in 2021, under LAMC 13.01.H and 13.01.I, and under ZA Memo 133, a discretionary review with a public hearing was required, and that one of the purposes would be to "further reduce, if necessary, any land use impacts."

- The Chief ZA then listed an array of potential public health and environmental impacts, and the Chief ZA specifically discussed "routine maintenance acidizing" as one of the kinds of projects needing this level of discretionary review under the law in force in 2021.
- Discretionary review triggers a CEQA case and the Chief ZA's recognition of potential for environmental impact should make a Categorical Exemption inappropriate. But of course there were no applications, no reviews, and no CEQA clearances of any kind - only violations of City Code by executing projects that were prohibited because they did not have the Code-required approvals.

**The "maintenance acidizing" project executed between the two ZA public hearings and the two "maintenance acidizing" projects executed while the CEQA appeal has been pending in City Council are remarkably brazen.**

Clearly the only message that oil companies hear from the West Pico Drill Site case, so far, is that they can ignore City law and CEQA at will. Requirements and prohibitions mean nothing if there is no enforcement.

The West Pico Drill Site case is in the hands of City Council where, fortunately, Council Members "have the opportunity right now to take a stand against ongoing violations" and put a stop to this dangerous behavior at West Pico and other Drill Sites in the City.

**Copies of the documents referenced above are attached, and snapshots of key passages are appended below my signature.**

Yours,

Prof. Michael Salman

ZA-2022-8897-ZAI page 1:

OFFICE OF ZONING ADMINISTRATION  
200 N. SPRING STREET, ROOM 703  
LOS ANGELES, CA 90012-4801  
(213) 978-1318

EMILIEH MAILLIAN  
CHIEF ZONING ADMINISTRATOR

ASSOCIATE ZONING ADMINISTRATORS

JACK CHIANG  
HENRY CHU  
TIM FARGO  
JONATHAN A. HERSHEY, AICP  
PHYLLIS NATHANSON  
CHARLES J. RAUSCH JR.  
CHRISTINE SAPONARA  
COURTNEY SHUM  
CHRISTINA TOY LEE  
JORDANN TURNER

CITY OF LOS ANGELES  
CALIFORNIA



KAREN BASS  
MAYOR

LOS ANGELES DEPARTMENT  
OF CITY PLANNING  
EXECUTIVE OFFICES

VINCENT P. BERTONI, AICP  
DIRECTOR  
SHANA M.M. BONSTIN  
DEPUTY DIRECTOR  
ARTHI L. VARMA, AICP  
DEPUTY DIRECTOR  
LISA M. WEBBER, AICP  
DEPUTY DIRECTOR  
planning@cityofla.org

January 17, 2023

Public Counters	CASE NO. ZA-2022-8997-ZAI
Department of City Planning	ZONING ADMINISTRATOR'S
Department of Building and Safety	INTERPRETATION
All Interested Parties	Well Maintenance
	CITYWIDE

This Zoning Administrator's Interpretation (ZAI) interprets what drill site activities qualify as "well maintenance". **Well maintenance** for oil and gas extraction sites shall be interpreted as any scope of work that meets either of the following two criteria:

1. A scope of work that requires a Notice of Intention "Rework Permit" to carry out a rework project on a well from the California Geologic Energy Management Division (CalGEM).<sup>1</sup>
2. A scope of work that requires online notification per the South Coast Air Quality Management District's (SCAQMD) Rule 1148.2 - "Notification and Reporting Requirements for Oil and Gas Well and Chemical Suppliers".<sup>2</sup>

<sup>1</sup> Permitting, Forms, and Compliance - Oil and Gas Requirements and Forms, Well Permit Information, Rework/Redrills, California Energy Geologic Management Division, 2022. <[https://www.conservation.ca.gov/calgem/for\\_operators](https://www.conservation.ca.gov/calgem/for_operators)>

<sup>2</sup> Compliance - Oil and Gas Well Electronic Notification and Reporting (Rule 1148.2) - South Coast Air Quality Management District, 2022. <<https://www.aqmd.gov/home/rules-compliance/compliance/1148-2>>

pages 2-3

**BACKGROUND**

The LAMC contains several Zoning Code provisions that regulate oil and gas drill sites. These sites are primarily regulated by LAMC Section 13.01. LAMC Section 13.01-H states that any person desiring to "drill, deepen, or maintain an oil well..." requires a determination from the Zoning Administrator. The Zoning Code does not specify what activities might constitute a desire to "maintain an oil well."

In the past several decades the Zoning Administrator has reviewed and determined when a proposed scope of work at a drill site qualifies as a well maintenance project on a case by case basis.

Pertinent LAMC Section 13.01-I | and Section 13.01-I read as follows (underline added):

**H. "Drilling Site Requirements.** Any person desiring to drill, deepen or maintain an oil well in an oil drilling district that has been established by ordinance, or to drill or deepen and subsequently maintain an oil well in the M3 Zone within 500 feet of a more restrictive zone shall file an application in the Department of City Planning on a form provided by the Department, requesting a determination of the conditions under which the operations may be conducted."

**I. "Permits. (Amended by Ord. No. 173,268, Eff. 7/1/00, Oper. 7/1/00.)** No person shall drill, deepen or maintain an oil well or convert an oil well from one class to the other and no permits shall be issued for that use, until a

*determination has been made by the Zoning Administrator or Area Planning Commission pursuant to the procedure prescribed in Subsection H of this section."*

page 4-5

#### **DISCUSSION**

The OZA relied on specific sources to interpret the scopes of work for well maintenance that include, but are not limited to: federal regulatory agency standards, state regulatory agency standards, scientific articles, and engineering publications related to petroleum engineering and oil extraction. The OZA also consulted with the City's Petroleum Administrator, Fire Department, SCAQMD, and CalGEM. As a result of this research and consultation, the OZA has determined two qualifying criteria for which activities shall be considered as **well maintenance**:

1. A scope of work that requires a Notice of Intention "Rework Permit" to carry out a rework project on a well from CalGEM.
2. A scope of work that requires online notification per SCAQMD's Rule 1148.2 - "Notification and Reporting Requirements for Oil and Gas Well and Chemical Suppliers".

The OZA has examined a growing body of research, including those of a scientific advisory panel's response (October 2021) to CalGEM regarding the effects of oil

extraction and production on public health<sup>3</sup>, which illustrates the need to better regulate well maintenance activities. This scientific advisory panel, consisting of scientists, engineers, and public health analysts, determined that extraction activities may have negative external effects on the health and well-being of people within the vicinity of such operations. In another study published in April 2017, researchers examined the overlap of the type of chemicals and trade products used in hydraulic fracturing activities and routine maintenance acidizing projects. This 2017 study concluded that there is substantial overlap given the number of similar chemicals used during these activities.<sup>4</sup> This analysis was done specifically using SCAQMD data, which is particularly relevant as this agency also regulates oil drill sites for air emissions and odors. These aforementioned studies confirm the potential negative external effects on community public health and on the environment, and serve as further justification for formally establishing the procedures for a discretionary review for well maintenance activities.

In reviewing well maintenance projects, regulatory agencies such as CalGEM and SCAQMD have narrow purviews in what they can regulate. Therefore, the Zoning Administrator's authority under the local zoning code to review maintenance activities in a more comprehensive manner, can help further reduce, if necessary, any land use impacts. Specifically, as it relates to oil and gas extraction, CalGEM focuses on subsurface and near surface activities whereas SCAQMD regulates the effects on air quality, including emissions and pollutants. These agencies do not regulate other significant land use impacts for oil and gas extraction activities. Such land use impacts include, but are not limited to: traffic/transportation circulation, noise decibel levels, aesthetics, and noxious odors resulting from proposed activities conducted at drill sites. Well maintenance activities, as described herein, may have a negative land use impacts on surrounding communities such as elevated noise levels, frequent odor events, increased emissions exposure, spill incidents affecting the public right-of-way, truck traffic congestion on local streets, removal of on-street parking, traffic congestion on local streets, and lack of effective screening for drill site equipment. As such, the Zoning Administrator's review allows for a more comprehensive analysis of proposed well maintenance activities and ability to mitigate any potential impacts, if necessary.

The Zoning Administrator's Interpretation advances the City's goal to prioritize the safety and quality of livability for local residents while providing an opportunity for operators to keep wells functioning in a safe and compliant manner.

<sup>3</sup> "CalGEM Questions for the California Oil and Gas Public Health Rulemaking Scientific Advisory Panel", Physicians, Scientists, and Engineers for Healthy Energy, and Lawrence National Berkeley Laboratory, and UC Berkeley's Department of Environmental Science, Policy, and Management (commissioned by the CA Department of Conservation). Identifies the substantial amount of health risks (both physical and mental health) associated with many elements of oil and gas extraction activity and discusses a buffer as potential harm reduction method. October, 2021.

<sup>4</sup> "Comparison of chemical-use between hydraulic fracturing, acidizing, and routine oil and gas development", Physicians, Scientists, and Engineers for Healthy Energy (funded by UC Berkeley and U.S. Department of Energy grants). Analyzes the usage of chemicals from South Coast AQMD disclosure data and concludes that there is overlap between fracking chemicals and "maintenance acidizing" chemicals. April, 2017.

## R1148.2 (d) Notification

### User Information

<b>EForm Status</b> COMPLETED	<b>Date Stored</b> 07/24/2020	<b>Time Stored</b> 12:32 PM
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### Notification Type

<b>Notification Type*</b> ORIGINAL	<b>Has this Previous Event ID Been superseded?</b> 
<b>Previous Event ID for Cancellation, Revision Date or Other</b> 	

### Operator Information

<b>Event ID</b> 0080
<b>Facility ID*</b> 98138
<b>Facility Name*</b> PACIFIC COAST ENERGY COMPANY LP
<b>Operator Name*</b> PCECLP

### Extension Information

<b>New extended date and time for well activity to begin</b> 	<b>Number of previously requested extensions requested under the original notification</b> 
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### Well Information

<b>Well Name /ID*</b> WP 40	<b>API Well Number*</b> 04-037-21284
<b>Well Type*</b> OIL	<b>Well Geographical Coordinates (NAD 83 Format)</b>
<b>County*</b> LOS ANGELES	<b>Well Latitude*</b> 34.055538
<b>Zip Code*</b> 90035	<b>Well Longitude*</b> -118.390195
<b>City</b> LOS ANGELES	<b>Start Date and Time</b> 07/28/2020 12:00:00 AM

### Description of Well Activities

Select all that apply. If conducting a series of, or any combination of well production stimulation or treatment activities, identify all types of well production stimulation or treatment activity conducted.

Please click the Add button to the right to enter Well Activities

Add

<b>Well Activity</b> WELL REWORK	<input type="checkbox"/> Acidizing*
<b>Type of Drilling</b> 	<input type="checkbox"/> Hydraulic Fracturing
	<input type="checkbox"/> Gravel Packing
	<input checked="" type="checkbox"/> Maintenance Acidizing
	<input type="checkbox"/> Matrix Acidizing
	<input type="checkbox"/> Acid Fracturing
	<b>Other (Please List)</b> 

\* Prior to April 2014, notifications did not distinguish between matrix and maintenance acidizing, and are reported as acidizing.

**Nearest Sensitive Receptor Located within 1,500 feet of well**

Well Has Sensitive Receptor

Receptor Type

Receptor Distance to Well in feet

Receptor Facility Name

Address

City

Zip Code

**Certification Statement**

Pursuant to SCAQMD Rule 1148.2(d), this form shall be submitted to the District no more than 10 days and no less than 24 hours prior to the start of well drilling, well completion, or well rework. If the start date(s) of subject activities is modified, the owner or operator shall notify the District at least 24 hours prior to the new start date if modified to occur earlier than the original start date, or within 24 hours prior to the original start date if modified to occur after the original start date, or if the original start date is cancelled. By clicking the checkbox below, I certify that I am the duly-authorized person to submit this form. I hereby attest, to the best of my knowledge, that the information contained herein is true, accurate and complete. With regard to information that I do not have personal knowledge of, I hereby attest that I have accurately entered the information contained herein from authorized personnel who represented that the information is true, accurate and complete.

I Agree to the above Certification Statement \*

## R1148.2 (d) Notification

### User Information

**EForm Status**  
 COMPLETED

**Date Stored**  
 10/06/2021

**Time Stored**  
 10:21 AM

### Notification Type

**Notification Type\***  
 ORIGINAL

**Has this Previous Event ID Been superseded?**

**Previous Event ID for Cancellation, Revision Date or Other**

### Operator Information

**Event ID**  
 0935

**Facility ID\***  
 98158

**Facility Name\***  
 PACIFIC COAST ENERGY COMPANY LP

**Operator Name\***  
 PCEC

### Extension Information

**New extended date and time for well activity to begin**

**Number of previously requested extensions requested under the original notification**

### Well Information

**Well Name /ID\***  
 WP\_40

**API Well Number\***  
 04-037-21284

**Well Type\***  
 OIL

**Well Geographical Coordinates (NAD 83 Format)**

**County\***  
 LOS ANGELES

**Well Latitude\***  
 34.055338

**Zip Code\***  
 90035

**Well Longitude\***  
 -118.390195

**City**  
 LOS ANGELES

**Start Date and Time**  
 10/11/2021 12:00:00 AM

### Description of Well Activities

Select all that apply. If conducting a series of, or any combination of well production stimulation or treatment activities, identify all types of well production stimulation or treatment activity conducted.

Please click the Add button to the right to enter Well Activities Add

**Well Activity**  
 WELL REWORK

**Type of Drilling**

- Acidizing\*
- Hydraulic Fracturing
- Gravel Packing
- Maintenance Acidizing
- Matrix Acidizing
- Acid Fracturing

**Other (Please List)**

\* Prior to April 2014, notifications did not distinguish between matrix and maintenance acidizing, and are reported as acidizing.

**Nearest Sensitive Receptor Located within 1,500 feet of well**

Well Has Sensitive Receptor

Receptor Type

Receptor Distance to Well in feet

Receptor Facility Name

Address

City

Zip Code

**Certification Statement**

Pursuant to SCAQMD Rule 1148.2(d), this form shall be submitted to the District no more than 10 days and no less than 24 hours prior to the start of well drilling, well completion, or well rework. If the start date(s) of subject activities is modified, the owner or operator shall notify the District at least 24 hours prior to the new start date if modified to occur earlier than the original start date, or within 24 hours prior to the original start date if modified to occur after the original start date, or if the original start date is cancelled. By clicking the checkbox below, I certify that I am the duly-authorized person to submit this form. I hereby attest, to the best of my knowledge, that the information contained herein is true, accurate and complete. With regard to information that I do not have personal knowledge of, I hereby attest that I have accurately entered the information contained herein from authorized personnel who represented that the information is true, accurate and complete.

I Agree to the above Certification Statement \*

## R1148.2 (d) Notification

### User Information

EForm Status

COMPLETED

Date Stored

10/25/2021

Time Stored

9:20 AM

### Notification Type

Notification Type \*

ORIGINAL

Has this Previous Event ID Been superseded?

Previous Event ID for Cancellation, Revision Date or Other

### Operator Information

Event ID

6948

Facility ID \*

98158

Facility Name \*

PACIFIC COAST ENERGY COMPANY LP

Operator Name \*

PCEC

### Extension Information

New extended date and time for well activity to begin

Number of previously requested extensions requested under the original notification

### Well Information

Well Name /ID \*

WP 58

API Well Number \*

04-027-26615

Well Type \*

OIL

Well Geographical Coordinates (NAD 83 Format)

Well Latitude \*

34.05546951

County \*

LOS ANGELES

Well Longitude \*

-118.39039612

Zip Code \*

90035

Start Date and Time

10/28/2021 12:00:00 AM

City

LOS ANGELES

### Description of Well Activities

Select all that apply. If conducting a series of, or any combination of well production stimulation or treatment activities, identify all types of well production stimulation or treatment activity conducted.

Please click the Add button to the right to enter Well Activities

Add

Well Activity

WELL REWORK

Type of Drilling

Acidizing\*

Hydraulic Fracturing

Gravel Packing

Maintenance Acidizing

Matrix Acidizing

Acid Fracturing

Other (Please List)

\* Prior to April 2014, notifications did not distinguish between matrix and maintenance acidizing, and are reported as acidizing.

**Nearest Sensitive Receptor Located within 1,500 feet of well**

<input type="checkbox"/> Well Has Sensitive Receptor Receptor Type <input style="width: 100%;" type="text"/> Receptor Distance to Well in feet <input style="width: 100%;" type="text"/>	Receptor Facility Name <input style="width: 100%;" type="text"/> Address <input style="width: 100%;" type="text"/> City <input style="width: 100%;" type="text"/> Zip Code <input style="width: 100%;" type="text"/>
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**Certification Statement**

Pursuant to SCAQMD Rule 1148.2(d), this form shall be submitted to the District no more than 10 days and no less than 24 hours prior to the start of well drilling, well completion, or well rework. If the start date(s) of subject activities is modified, the owner or operator shall notify the District at least 24 hours prior to the new start date if modified to occur earlier than the original start date, or within 24 hours prior to the original start date if modified to occur after the original start date, or if the original start date is cancelled. By clicking the checkbox below, I certify that I am the duly-authorized person to submit this form. I hereby attest, to the best of my knowledge, that the information contained herein is true, accurate and complete. With regard to information that I do not have personal knowledge of, I hereby attest that I have accurately entered the information contained herein from authorized personnel who represented that the information is true, accurate and complete.

I Agree to the above Certification Statement \*

Attachments:

ZA-2022-8997-ZAI-Well_Maintenance ZA guidance.pdf	813 KB
SCAQMD R1148.2 (d) Notification - PB - 10-14-13 WP 40 0403721284.pdf	317 KB
SCAQMD R1148.2 (d) Notification - PB 11-23-15 maintenance acidizing 0403726615.pdf	349 KB
SCAQMD R1148.2 (d) Notification - PB 4-18-16 maintenance acidizing 0403721284.pdf	329 KB
SCAQMD R1148.2 (d) Notification - PB 9-15-16 maintenance acidizing 04037210350.pdf	331 KB
SCAQMD R1148.2 (d) Notification - PB 10-26-16 maintenance acidizing 0403721098.pdf	330 KB
SCAQMD R1148.2 (d) Notification - PB 6-9-17 maintenance acidizing 0403721284.pdf	330 KB
SCAQMD R1148.2 (d) Notification - PB 1-31-18 maintenance acidizing 0403721284.pdf	334 KB
SCAQMD R1148.2 (d) Notification - PB 7-28-20 maintenance acidizing 0403721284.pdf	350 KB
SCAQMD R1148.2 (d) Notification - PB 10-11-21 maintenance acidizing 0403721284.pdf	349 KB
SCAQMD R1148.2 (d) Notification - PB 10-28-21 maintenance acidizing 0403726615.pdf	350 KB

OFFICE OF ZONING ADMINISTRATION  
200 N. SPRING STREET, ROOM 763  
LOS ANGELES, CA 90012-4801  
(213) 978-1318

ESTINEH MAILIAN  
CHIEF ZONING ADMINISTRATOR

ASSOCIATE ZONING ADMINISTRATORS

JACK CHIANG  
HENRY CHU  
TIM FARGO  
JONATHAN A. HERSHEY, AICP  
PHYLLIS NATHANSON  
CHARLES J. RAUSCH JR.  
CHRISTINE SAPONARA  
COURTNEY SHUM  
CHRISTINA TOY LEE  
JORDANN TURNER

CITY OF LOS ANGELES  
CALIFORNIA



KAREN BASS  
MAYOR

LOS ANGELES DEPARTMENT  
OF CITY PLANNING  
EXECUTIVE OFFICES

VINCENT P. BERTONI, AICP  
DIRECTOR

SHANA M.M. BONSTIN  
DEPUTY DIRECTOR

ARTHI L. VARMA, AICP  
DEPUTY DIRECTOR

LISA M. WEBBER, AICP  
DEPUTY DIRECTOR

planning.lacity.org

January 17, 2023

Public Counters

Department of City Planning

Department of Building and Safety

All Interested Parties

CASE NO. ZA-2022-8997-ZAI  
ZONING ADMINISTRATOR'S  
INTERPRETATION

Well Maintenance

CITYWIDE

This Zoning Administrator's Interpretation (ZAI) interprets what drill site activities qualify as "well maintenance". **Well maintenance** for oil and gas extraction sites shall be interpreted as any scope of work that meets either of the following two criteria:

1. A scope of work that requires a Notice of Intention "Rework Permit" to carry out a rework project on a well from the California Geologic Energy Management Division (CalGEM).<sup>1</sup>
2. A scope of work that requires online notification per the South Coast Air Quality Management District's (SCAQMD) Rule 1148.2 - "Notification and Reporting Requirements for Oil and Gas Well and Chemical Suppliers".<sup>2</sup>

<sup>1</sup> Permitting, Forms, and Compliance - Oil and Gas Requirements and Forms, Well Permit Information, Rework/Redrills. California Energy Geologic Management Division, 2022. <[https://www.conservation.ca.gov/calgem/for\\_operators](https://www.conservation.ca.gov/calgem/for_operators)>

<sup>2</sup> Compliance - Oil and Gas Well Electronic Notification and Reporting (Rule 1148.2) - South Coast Air Quality Management District, 2022. <<https://www.aqmd.gov/home/rules-compliance/compliance/1148-2>>

## AUTHORITY OF THE ZONING ADMINISTRATOR TO INTERPRET ZONING REGULATIONS

LAMC Section 12.21-A,2 provides, in pertinent part, as follows:

**“2. Other Use and Yard Determinations by the Zoning Administrator.** (Amended by Ord. No. 177,103, Eff. 12/18/05.) The Zoning Administrator shall have authority to determine other uses, in addition to those specifically listed in this article, which may be permitted in each of the various zones, when in his or her judgment, the other uses are similar to and no more objectionable to the public welfare than those listed.

The Zoning Administrator shall also have authority to interpret zoning regulations when the meaning of the regulation is not clear, either in general or as it applies to a specific property or situation.

This Section has been interpreted to permit resolution of conflicts between disparate sections of the Code and to provide clarity where ambiguity exists.

### **BACKGROUND**

The LAMC contains several Zoning Code provisions that regulate oil and gas drill sites. These sites are primarily regulated by LAMC Section 13.01. LAMC Section 13.01-H states that any person desiring to “drill, deepen, or **maintain an oil well...**” requires a determination from the Zoning Administrator. The Zoning Code does not specify what activities might constitute a desire to “maintain an oil well.”

In the past several decades the Zoning Administrator has reviewed and determined when a proposed scope of work at a drill site qualifies as a well maintenance project on a case by case basis.

Pertinent LAMC Section 13.01-H and Section 13.01-I read as follows (underline added):

**H. “Drilling Site Requirements.** Any person desiring to drill, deepen or maintain an oil well in an oil drilling district that has been established by ordinance, or to drill or deepen and subsequently maintain an oil well in the M3 Zone within 500 feet of a more restrictive zone shall file an application in the Department of City Planning on a form provided by the Department, requesting a determination of the conditions under which the operations may be conducted.”

**I. “Permits. (Amended by Ord. No. 173,268, Eff. 7/1/00, Oper. 7/1/00.)** No person shall drill, deepen or maintain an oil well or convert an oil well from one class to the other and no permits shall be issued for that use, until a

*determination has been made by the Zoning Administrator or Area Planning Commission pursuant to the procedure prescribed in Subsection H of this section."*

Recently, on December 2, 2022, the City Council also approved Ordinance No. 187,709, which becomes effective on January 18, 2023, amending various parts of the LAMC relating to oil drilling. Among other changes, it eliminates LAMC Sections 13.01-H and 13.01-I and amends LAMC Section 12.23-C.4(a) to prohibit well maintenance, drilling, re-drilling, and deepening except to prevent or respond to a threat to public health, safety, or the environment, as determined by the Zoning Administrator.

Amended LAMC Section 12.23-C.4(a) reads as follows (underline added):

*"All oil wells (as defined pursuant to LAMC Section 13.01 B), including those operating pursuant to any discretionary permit in all zones, whether by ordinance or approval of a Zoning Administrator, and all oil wells in an M3 Zone, are nonconforming uses as of the effective date of the ordinance. No new well for the production of oil, gas or other hydrocarbon substances may be drilled in any zone. No existing well for the production of oil, gas or other hydrocarbon substances, which is a nonconforming use, shall be maintained, drilled, re-drilled, or deepened, except to prevent or respond to a threat to public health, safety, or the environment, as determined by the Zoning Administrator."*

This ZAI interprets **well maintenance** as applicable in both the current LAMC Sections 13.01-H and I, and the amended LAMC Section 12.23-C.4(a). More specifically, this ZAI interprets the term "maintain" in the current LAMC Sections 13.01-H and I; and the term "maintained" in the future amended LAMC Section 12.23-C.4(a).

The new ordinance, Ordinance No. 187,709, also amends existing oil drilling regulations and reviews required by the Zoning Administrator, which further raises the need for this interpretation. In the past, the Office of Zoning Administration (OZA) has been asked by operators, advocacy groups, and interested parties to interpret what constitutes well maintenance as it appears in the Zoning Code. This ZAI formally interprets what the term, well maintenance, entails as needed for the land use regulation of drill sites.

#### **Implementation per LAMC Section 13.01-H:**

ZA Memo 133, dated September 19, 2016, established a comprehensive set of procedures and policies for the acceptance and processing of oil drilling applications pursuant to LAMC Section 13.01-H. This Section requires any person (or operator/applicant) seeking to "drill, deepen, or maintain an oil well ... [to] file an application in the Department of City Planning...". ZA Memo 133 is the guiding document for operators (or applicants) seeking approvals pursuant to LAMC 13.01-H.

Operators (or applicants) are required to submit an application for a discretionary review that includes a public hearing, mailing notice, and additional review standards. Since 2016, when ZA Memo 133 was released, the OZA has been engaged in reviewing and determining scopes of work that qualify as maintenance and warrant a discretionary review. This has mainly been done on a case by case basis, and at times by the request of the operator to the OZA. Other times, OZA staff have informed operators that a discretionary request would be required for well maintenance activities that were performed without consultation or review by the OZA.

#### **Implementation per LAMC Section 12.23-C.4(a):**

This ZAI also applies to any requests from operators that wish to complete any scope(s) of work involving well maintenance activities pursuant to LAMC Section 12.23-C.4. This LAMC section was recently amended to prohibit various well activities, including well maintenance, unless the operator can demonstrate that the work is to prevent or respond to a threat to public health, safety, and/or the environment. Operators shall follow the procedures referenced in ZA Memo 141 and complete all required materials.

The well maintenance activities listed in this Interpretation are permitted only when filed, reviewed, and approved, pursuant to both the applicable code section and appropriate procedures as established by the relevant ZA Memos.

#### **DISCUSSION**

The OZA relied on specific sources to interpret the scopes of work for well maintenance that include, but are not limited to: federal regulatory agency standards, state regulatory agency standards, scientific articles, and engineering publications related to petroleum engineering and oil extraction. The OZA also consulted with the City's Petroleum Administrator, Fire Department, SCAQMD, and CalGEM. As a result of this research and consultation, the OZA has determined two qualifying criteria for which activities shall be considered as **well maintenance**:

1. A scope of work that requires a Notice of Intention "Rework Permit" to carry out a rework project on a well from CalGEM.
2. A scope of work that requires online notification per SCAQMD's Rule 1148.2 - "Notification and Reporting Requirements for Oil and Gas Well and Chemical Suppliers".

The OZA has examined a growing body of research, including those of a scientific advisory panel's response (October 2021) to CalGEM regarding the effects of oil

extraction and production on public health<sup>3</sup>, which illustrates the need to better regulate well maintenance activities. This scientific advisory panel, consisting of scientists, engineers, and public health analysts, determined that extraction activities may have negative external effects on the health and well-being of people within the vicinity of such operations. In another study published in April 2017, researchers examined the overlap of the type of chemicals and trade products used in hydraulic fracturing activities and routine maintenance acidizing projects. This 2017 study concluded that there is substantial overlap given the number of similar chemicals used during these activities.<sup>4</sup> This analysis was done specifically using SCAQMD data, which is particularly relevant as this agency also regulates oil drill sites for air emissions and odors. These aforementioned studies confirm the potential negative external effects on community public health and on the environment, and serve as further justification for formally establishing the procedures for a discretionary review for well maintenance activities.

In reviewing well maintenance projects, regulatory agencies such as CalGEM and SCAQMD have narrow purviews in what they can regulate. Therefore, the Zoning Administrator's authority under the local zoning code to review maintenance activities in a more comprehensive manner, can help further reduce, if necessary, any land use impacts. Specifically, as it relates to oil and gas extraction, CalGEM focuses on subsurface and near surface activities whereas SCAQMD regulates the effects on air quality, including emissions and pollutants. These agencies do not regulate other significant land use impacts for oil and gas extraction activities. Such land use impacts include, but are not limited to: traffic/transportation circulation, noise decibel levels, aesthetics, and noxious odors resulting from proposed activities conducted at drill sites. Well maintenance activities, as described herein, may have a negative land use impacts on surrounding communities such as elevated noise levels, frequent odor events, increased emissions exposure, spill incidents affecting the public right-of-way, truck traffic congestion on local streets, removal of on-street parking, traffic congestion on local streets, and lack of effective screening for drill site equipment. As such, the Zoning Administrator's review allows for a more comprehensive analysis of proposed well maintenance activities and ability to mitigate any potential impacts, if necessary.

The Zoning Administrator's Interpretation advances the City's goal to prioritize the safety and quality of livability for local residents while providing an opportunity for operators to keep wells functioning in a safe and compliant manner.

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<sup>3</sup> "CalGEM Questions for the California Oil and Gas Public Health Rulemaking Scientific Advisory Panel", Physicians, Scientists, and Engineers for Healthy Energy; and Lawrence National Berkeley Laboratory; and UC Berkeley's Department of Environmental Science, Policy, and Management (commissioned by the CA Department of Conservation), Identifies the substantial amount of health risks (both physical and mental health) associated with many elements of oil and gas extraction activity and discusses a buffer as potential harm reduction method. October, 2021.

<sup>4</sup> "Comparison of chemical-use between hydraulic fracturing, acidizing, and routine oil and gas development", Physicians, Scientists, and Engineers for Healthy Energy (funded by UC Berkeley and U.S. Department of Energy grants), Analyzes the usage of chemicals from South Coast AQMD disclosure data and concludes that there is overlap between fracking chemicals and 'maintenance acidizing' chemicals. April, 2017.

## Overview of Oil and Gas Well Activities Considered as Well Maintenance

Regulatory standards from agencies, primarily CalGEM and SCAQMD, helped shape the decision to define what activities qualify as well maintenance. Per state regulations, when operators propose to conduct specific well maintenance activities (such as maintenance acidizing or a well recasing), operators are required to apply for a permit and/or submit notification to various regulatory agencies such as SCAQMD or CalGEM.

For example, when an operator wishes to conduct maintenance acidizing on a well, the operator must disclose a chemical use list to SCAQMD and the agency sends an electronic notification of the proposed work. Members of the public can subscribe to receive these notifications when an operator plans to conduct the proposed maintenance acidizing project or any other project that requires notification pursuant to SCAQMD Rule 1148.2. In this example, under the authority of LAMC Section 13.01-H, and per this ZAI, the Zoning Administrator would review this request for maintenance acidizing because it requires online notification per SCAQMD's Rule 1148.2. As part of this discretionary review, the Zoning Administrator could include conditions to minimize land use impacts to the local vicinity.

In this same example, per this ZAI and upon the effectuation of Ordinance No. 187,709, which eliminates LAMC Section 13.01-H, a request for maintenance acidizing would still require online notification per SCAQMD's Rule 1148.2, and as such, be considered as well maintenance. Per LAMC 12.23-C.4(a), this well maintenance scope of work would be prohibited *except* as necessary to prevent or respond to any Health and Safety threats. ZA Memo 141 provides guidance pursuant to requests made to LAMC Section 12.23-C.4(a).

Similarly to SCAQMD's oversight on oil and gas wells, CalGEM requires a Notice of Intention application for projects that will "rework" an existing well<sup>5</sup>; rework on a well can often entail a permanent modification to the well casing. Based on CalGEM's procedures, rework activities can include projects such as liner replacement in the well casing or converting an injection well to a producer well. This ZAI interprets that such proposed rework project would be considered as maintenance activity and as such, subject to review by the Zoning Administrator.

Operators may apply for multiple well maintenance projects, under one application, for a single drill site. Such batched submittals, under one application and at the same time, will allow the Zoning Administrator to assess the entirety of the scope and do a more comprehensive review. Surrounding neighbors and interested parties will also get a better overview of the proposed maintenance activities, with more transparency and

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<sup>5</sup> Well Permit Information portal, California Geologic Energy Management Division online website, July 2022, [https://www.conservation.ca.gov/calgem/for\\_operators](https://www.conservation.ca.gov/calgem/for_operators)

predictability. In turn, the operator will have a more timely review and not have to submit multiple applications. Operators shall file applications per the appropriate procedures and applicable code section (e.g. LAMC Section 13.01-H or LAMC Section 12.23-C.4).

## **DETERMINATION**

For the reasons set forth above, "**well maintenance**" is interpreted to include any scope of work that meets any of the following criteria:

1. A scope of work that requires a Notice of Intention "Rework Permit" to carry out a rework project on a well from CalGEM.
2. A scope of work that requires online notification per the SCAQMDs Rule 1148.2 - "Notification and Reporting Requirements for Oil and Gas Well and Chemical Suppliers".

**Well Servicing.** Repair and servicing work may be carried out on existing wells if the scope of work does not meet the criteria for well maintenance, as described in this ZAI. Work activities conducted on the wells that do not meet the criteria for well maintenance shall be considered well servicing. Examples of well servicing can include projects such as well pump replacement or maintenance of underground and/or aboveground storage tanks that service the oil well operations.

This interpretation shall be published pursuant to the LAMC and administrative practice of the OZA.

## **CEQA FINDINGS**

The issuance of this Zoning Administrator Interpretation ("ZAI") that defines "well maintenance" is not a "project" as that term is defined by CEQA Guidelines, Section 15378 as it constitutes an administrative activity to assist in the implementation of the Oil and Gas Drilling Ordinance (Ordinance No. 187,709) adopted by the City Council on December 2, 2022 and which becomes effective on January 18, 2023. However, even if this ZAI is determined to be a project for purposes of CEQA; it was evaluated in the Initial Study prepared by the City to support the Mitigated Negative Declaration (Case No. ENV-2022-4865-MND) prepared for the Oil and Gas Drilling Ordinance.

## **APPEAL PERIOD – EFFECTIVE DATE**

The Zoning Administrator's determination in this matter will become effective after **February 01, 2023**, unless an appeal therefrom is filed with the Department of City Planning. It is strongly advised that appeals be filed early during the appeal period and in person so that imperfections/incompleteness may be corrected before the appeal

period expires. Any appeal must be filed on the prescribed forms, accompanied by the required fee, a copy of the Zoning Administrator's action, and received and receipted at a public office of the Department of City Planning on or before the above date or the appeal will not be accepted. Forms are available online at <http://planning.lacity.org>. Public offices are located at:

**Downtown**

Figueroa Plaza  
201 North Figueroa Street,  
4th Floor  
Los Angeles, CA 90012  
(213) 482-7077

**San Fernando Valley**

Marvin Braude San Fernando  
Valley Constituent Service Center  
6262 Van Nuys Boulevard, Room  
251  
Van Nuys, CA 91401  
(818) 374-5050

**West Los Angeles**

West Los Angeles Development  
Services Center  
1828 Sawtelle Boulevard,  
2nd Floor  
Los Angeles, CA 90025  
(310) 231-2598

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90<sup>th</sup> day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

ESTINEH MAILIAN



Chief Zoning Administrator

EM:VS:ECM:ds

# R1148.2 (d) Notification

## User Information

EForm Status

COMPLETED

Date Stored

02/03/2015

Time Stored

5:57 PM

## Operator Information

Event ID

868

Facility ID\*

98158

Facility Name\*

PACIFIC COAST ENERGY COMPANY LP

Operator Name\*

PACIFIC COAST ENERGY COMPANY LP

## Well Information

Well Name /ID\*

WEST PICO 40

API Well Number\*

Well Type\*

OIL

Well Geographical Coordinates (NAD 83 Format)

Well Latitude\*

34.0555349

County\*

LOS ANGELES

Well Longitude\*

-118.3901818

Zip Code\*

90035

## Notification Type

Notification Type\*

ORIGINAL

Previous Event ID for Cancellation, Revision Date or Other

## Description of Well Activities

Select all that apply. If conducting a series of, or any combination of well production stimulation or treatment activities, identify all types of well production stimulation or treatment activity conducted.

Please click the Add button to the right to enter Well Activities

Add

Well Activity\*

WELL REWORK

Acidizing\*

Hydraulic Fracturing

Start Date\*

10/14/2013

Gravel Packing

Type of Drilling

Maintenance Acidizing

Matrix Acidizing

Acid Fracturing

Other (Please List)

\* Prior to April 2014, notifications did not distinguish between matrix and maintenance acidizing, and are reported as acidizing.

## Nearest Sensitive Receptor Located within 1,500 feet of well

Well Has Sensitive Receptor

Receptor Facility Name

Receptor Type

RESIDENCE

Address

1135 SOUTH DOHENY DRIVE

Receptor Distance to Well in feet

Receiver Distance to Well in Feet

187

City

LOS ANGELES

Zip Code

90035

### Certification Statement

Pursuant to SCAQMD Rule 1148.2(d), this form shall be submitted to the District no more than 10 days and no less than 24 hours prior to the start of well drilling, well completion, or well rework. If the start date(s) of subject activities is modified, the owner or operator shall notify the District at least 24 hours prior to the new start date if modified to occur earlier than the original start date, or within 24 hours prior to the original start date if modified to occur after the original start date, or if the original start date is cancelled. By clicking the checkbox below, I certify that I am the duly-authorized person to submit this form. I hereby attest, to the best of my knowledge, that the information contained herein is true, accurate and complete. With regard to information that I do not have personal knowledge of, I hereby attest that I have accurately entered the information contained herein from authorized personnel who represented that the information is true, accurate and complete.

I Agree to the above Certification Statement \*

# R1148.2 (d) Notification

## User Information

EForm Status

COMPLETED

Date Stored

11/19/2015

Time Stored

4:43 PM

## Notification Type

Notification Type\*

ORIGINAL

Has this Previous Event ID Been superseded?

Previous Event ID for Cancellation, Revision Date or Other

## Operator Information

Event ID

3569

Facility ID\*

98158

Facility Name\*

PACIFIC COAST ENERGY COMPANY LP

Operator Name\*

PACIFIC COAST ENERGY COMPANY LP

## Extension Information

New extended date and time for well activity to begin

Number of previously requested extensions requested under the original notification

## Well Information

Well Name /ID\*

WP58

API Well Number\*

04-037-26615

Well Type\*

OIL

Well Geographical Coordinates (NAD 83 Format)

Well Latitude\*

34.055482

County\*

LOS ANGELES

Well Longitude\*

-118.390429

Zip Code\*

90035

Start Date and Time

11/23/2015 12:00:00 PM

City

LOS ANGELES

## Description of Well Activities

Select all that apply. If conducting a series of, or any combination of well production stimulation or treatment activities, identify all types of well production stimulation or treatment activity conducted.

Please click the Add button to the right to enter Well Activities

Add

Well Activity

WELL REWORK

Type of Drilling

Acidizing\*

Hydraulic Fracturing

Gravel Packing

Maintenance Acidizing

Matrix Acidizing

Acid Fracturing

Other (Please List)

\* Prior to April 2014, notifications did not distinguish between matrix and maintenance acidizing, and are reported as acidizing.

Please click the Add button to the right to enter Well Activities

Add

### Nearest Sensitive Receptor Located within 1,500 feet of well

Well Has Sensitive Receptor

Receptor Type

RESIDENCE

Receptor Distance to Well in feet

156

Receptor Facility Name

Address

1132 S. OAKHURST DR.

City

LOS ANGELES

Zip Code

90035

### Certification Statement

Pursuant to SCAQMD Rule 1148.2(d), this form shall be submitted to the District no more than 10 days and no less than 24 hours prior to the start of well drilling, well completion, or well rework. If the start date(s) of subject activities is modified, the owner or operator shall notify the District at least 24 hours prior to the new start date if modified to occur earlier than the original start date, or within 24 hours prior to the original start date if modified to occur after the original start date, or if the original start date is cancelled. By clicking the checkbox below, I certify that I am the duly-authorized person to submit this form. I hereby attest, to the best of my knowledge, that the information contained herein is true, accurate and complete. With regard to information that I do not have personal knowledge of, I hereby attest that I have accurately entered the information contained herein from authorized personnel who represented that the information is true, accurate and complete.

I Agree to the above Certification Statement \*

# R1148.2 (d) Notification

## User Information

EForm Status

COMPLETED

Date Stored

04/15/2016

Time Stored

9:41 AM

## Notification Type

Notification Type \*

ORIGINAL

Has this Previous Event ID Been superseded?

Previous Event ID for Cancellation, Revision Date or Other

## Operator Information

Event ID

3709

Facility ID \*

98158

Facility Name \*

PACIFIC COAST ENERGY COMPANY LP

Operator Name \*

PACIFIC COAST ENERGY COMPANY LP

## Extension Information

New extended date and time for well activity to begin

Number of previously requested extensions requested under the original notification

## Well Information

Well Name /ID \*

WEST PICO 40

API Well Number \*

04-037-21284

Well Type \*

OIL

Well Geographical Coordinates (NAD 83 Format)

Well Latitude \*

34.0555349

County \*

LOS ANGELES

Well Longitude \*

-118.3901818

Zip Code \*

90035

Start Date and Time

04/18/2016 10:00:00 AM

City

LOS ANGELES

## Description of Well Activities

Select all that apply. If conducting a series of, or any combination of well production stimulation or treatment activities, identify all types of well production stimulation or treatment activity conducted.

Please click the Add button to the right to enter Well Activities

Add

Well Activity

WELL REWORK

Acidizing\*

Hydraulic Fracturing

Type of Drilling

Gravel Packing

Maintenance Acidizing

Matrix Acidizing

Acid Fracturing

Other (Please List)

\* Prior to April 2014, notifications did not distinguish between matrix and maintenance acidizing, and are reported as acidizing.

### Nearest Sensitive Receptor Located within 1,500 feet of well

Well Has Sensitive Receptor

Receptor Type

RESIDENCE

Receptor Distance to Well in feet

187

Receptor Facility Name

Address

1135 SOUTH DOHENY DRIVE

City

LOS ANGELES

Zip Code

90035

### Certification Statement

Pursuant to SCAQMD Rule 1148.2(d), this form shall be submitted to the District no more than 10 days and no less than 24 hours prior to the start of well drilling, well completion, or well rework. If the start date(s) of subject activities is modified, the owner or operator shall notify the District at least 24 hours prior to the new start date if modified to occur earlier than the original start date, or within 24 hours prior to the original start date if modified to occur after the original start date, or if the original start date is cancelled. By clicking the checkbox below, I certify that I am the duly-authorized person to submit this form. I hereby attest, to the best of my knowledge, that the information contained herein is true, accurate and complete. With regard to information that I do not have personal knowledge of, I hereby attest that I have accurately entered the information contained herein from authorized personnel who represented that the information is true, accurate and complete.

I Agree to the above Certification Statement \*

# R1148.2 (d) Notification

## User Information

EForm Status

COMPLETED

Date Stored

09/15/2016

Time Stored

7:49 AM

## Notification Type

Notification Type \*

EXTENSION

Has this Previous Event ID Been superseded?

N

Previous Event ID for Cancellation, Revision Date or Other

3836

## Operator Information

Event ID

3840

Facility ID \*

98158

Facility Name \*

PACIFIC COAST ENERGY COMPANY LP

Operator Name \*

PACIFIC COAST ENERGY COMPANY LP

## Extension Information

New extended date and time for well activity to begin

09/17/2016 11:59:00 AM

Number of previously requested extensions requested under the original notification

0

## Well Information

Well Name /ID \*

WP 30

API Well Number \*

40-372-10350

Well Type \*

OIL

Well Geographical Coordinates (NAD 83 Format)

Well Latitude \*

34.055538

County \*

LOS ANGELES

Well Longitude \*

-118.390298

Zip Code \*

90035

Start Date and Time

09/15/2016 12:00:00 PM

City

LOS ANGELES

## Description of Well Activities

Select all that apply. If conducting a series of, or any combination of well production stimulation or treatment activities, identify all types of well production stimulation or treatment activity conducted.

Please click the Add button to the right to enter Well Activities

Add

Well Activity

WELL REWORK

Acidizing\*

Hydraulic Fracturing

Type of Drilling

Gravel Packing

Maintenance Acidizing

Matrix Acidizing

Acid Fracturing

Other (Please List)

\* Prior to April 2014, notifications did not distinguish between matrix and maintenance acidizing, and are reported as acidizing.

### Nearest Sensitive Receptor Located within 1,500 feet of well

Well Has Sensitive Receptor

Receptor Type

Receptor Distance to Well in feet

Receptor Facility Name

Address

City

Zip Code

### Certification Statement

Pursuant to SCAQMD Rule 1148.2(d), this form shall be submitted to the District no more than 10 days and no less than 24 hours prior to the start of well drilling, well completion, or well rework. If the start date(s) of subject activities is modified, the owner or operator shall notify the District at least 24 hours prior to the new start date if modified to occur earlier than the original start date, or within 24 hours prior to the original start date if modified to occur after the original start date, or if the original start date is cancelled. By clicking the checkbox below, I certify that I am the duly-authorized person to submit this form. I hereby attest, to the best of my knowledge, that the information contained herein is true, accurate and complete. With regard to information that I do not have personal knowledge of, I hereby attest that I have accurately entered the information contained herein from authorized personnel who represented that the information is true, accurate and complete.

I Agree to the above Certification Statement \*

# R1148.2 (d) Notification

## User Information

EForm Status

COMPLETED

Date Stored

10/21/2016

Time Stored

2:32 PM

## Notification Type

Notification Type \*

ORIGINAL

Has this Previous Event ID Been superseded?

Previous Event ID for Cancellation, Revision Date or Other

## Operator Information

Event ID

3877

Facility ID \*

98158

Facility Name \*

PACIFIC COAST ENERGY COMPANY LP

Operator Name \*

PACIFIC COAST ENERGY COMPANY LP

## Extension Information

New extended date and time for well activity to begin

Number of previously requested extensions requested under the original notification

## Well Information

Well Name /ID \*

RW2

API Well Number \*

04-037-21098

Well Type \*

OIL

Well Geographical Coordinates (NAD 83 Format)

Well Latitude \*

34.055475

County \*

LOS ANGELES

Well Longitude \*

-118.390235

Zip Code \*

90035

Start Date and Time

10/26/2016 08:00:00 AM

City

LOS ANGELES

## Description of Well Activities

Select all that apply. If conducting a series of, or any combination of well production stimulation or treatment activities, identify all types of well production stimulation or treatment activity conducted.

Please click the Add button to the right to enter Well Activities

Add

Well Activity

WELL REWORK

Acidizing\*

Hydraulic Fracturing

Type of Drilling

Gravel Packing

Maintenance Acidizing

Matrix Acidizing

Acid Fracturing

Other (Please List)

\* Prior to April 2014, notifications did not distinguish between matrix and maintenance acidizing, and are reported as acidizing.

### Nearest Sensitive Receptor Located within 1,500 feet of well

Well Has Sensitive Receptor

Receptor Type

Receptor Distance to Well in feet

Receptor Facility Name

Address

City

Zip Code

### Certification Statement

Pursuant to SCAQMD Rule 1148.2(d), this form shall be submitted to the District no more than 10 days and no less than 24 hours prior to the start of well drilling, well completion, or well rework. If the start date(s) of subject activities is modified, the owner or operator shall notify the District at least 24 hours prior to the new start date if modified to occur earlier than the original start date, or within 24 hours prior to the original start date if modified to occur after the original start date, or if the original start date is cancelled. By clicking the checkbox below, I certify that I am the duly-authorized person to submit this form. I hereby attest, to the best of my knowledge, that the information contained herein is true, accurate and complete. With regard to information that I do not have personal knowledge of, I hereby attest that I have accurately entered the information contained herein from authorized personnel who represented that the information is true, accurate and complete.

I Agree to the above Certification Statement \*

# R1148.2 (d) Notification

## User Information

EForm Status

COMPLETED

Date Stored

06/07/2017

Time Stored

9:25 AM

## Notification Type

Notification Type \*

ORIGINAL

Has this Previous Event ID Been superseded?

Previous Event ID for Cancellation, Revision Date or Other

## Operator Information

Event ID

4158

Facility ID \*

98158

Facility Name \*

PACIFIC COAST ENERGY COMPANY LP

Operator Name \*

PACIFIC COAST ENERGY COMPANY LP

## Extension Information

New extended date and time for well activity to begin

Number of previously requested extensions requested under the original notification

## Well Information

Well Name /ID \*

WP 40

API Well Number \*

04-037-21284

Well Type \*

OIL

Well Geographical Coordinates (NAD 83 Format)

Well Latitude \*

34.055519

County \*

LOS ANGELES

Well Longitude \*

-118.391361

Zip Code \*

90035

Start Date and Time

06/09/2017 10:00:00 AM

City

LOS ANGELES

## Description of Well Activities

Select all that apply. If conducting a series of, or any combination of well production stimulation or treatment activities, identify all types of well production stimulation or treatment activity conducted.

Please click the Add button to the right to enter Well Activities

Add

Well Activity

WELL REWORK

Acidizing\*

Hydraulic Fracturing

Type of Drilling

Gravel Packing

Maintenance Acidizing

Matrix Acidizing

Acid Fracturing

Other (Please List)

\* Prior to April 2014, notifications did not distinguish between matrix and maintenance acidizing, and are reported as acidizing.

### Nearest Sensitive Receptor Located within 1,500 feet of well

Well Has Sensitive Receptor

Receptor Type

Receptor Distance to Well in feet

Receptor Facility Name

Address

City

Zip Code

### Certification Statement

Pursuant to SCAQMD Rule 1148.2(d), this form shall be submitted to the District no more than 10 days and no less than 24 hours prior to the start of well drilling, well completion, or well rework. If the start date(s) of subject activities is modified, the owner or operator shall notify the District at least 24 hours prior to the new start date if modified to occur earlier than the original start date, or within 24 hours prior to the original start date if modified to occur after the original start date, or if the original start date is cancelled. By clicking the checkbox below, I certify that I am the duly-authorized person to submit this form. I hereby attest, to the best of my knowledge, that the information contained herein is true, accurate and complete. With regard to information that I do not have personal knowledge of, I hereby attest that I have accurately entered the information contained herein from authorized personnel who represented that the information is true, accurate and complete.

I Agree to the above Certification Statement \*

# R1148.2 (d) Notification

## User Information

EForm Status

COMPLETED

Date Stored

01/29/2018

Time Stored

4:45 PM

## Notification Type

Notification Type\*

ORIGINAL

Has this Previous Event ID Been superseded?

Previous Event ID for Cancellation, Revision Date or Other

## Operator Information

Event ID

4762

Facility ID\*

98158

Facility Name\*

PACIFIC COAST ENERGY COMPANY LP

Operator Name\*

PACIFIC COAST ENERGY COMPANY LP

## Extension Information

New extended date and time for well activity to begin

Number of previously requested extensions requested under the original notification

## Well Information

Well Name /ID\*

WP 40

API Well Number\*

04-037-21284

Well Type\*

OIL

Well Geographical Coordinates (NAD 83 Format)

Well Latitude\*

34.055538

County\*

LOS ANGELES

Well Longitude\*

-118.390195

Zip Code\*

90035

Start Date and Time

01/31/2018 05:00:00 PM

City

LOS ANGELES

## Description of Well Activities

Select all that apply. If conducting a series of, or any combination of well production stimulation or treatment activities, identify all types of well production stimulation or treatment activity conducted.

Please click the Add button to the right to enter Well Activities

Add

Well Activity

WELL REWORK

Acidizing\*

Hydraulic Fracturing

Gravel Packing

Maintenance Acidizing

Matrix Acidizing

Acid Fracturing

Other (Please List)

Type of Drilling

\* Prior to April 2014, notifications did not distinguish between matrix and maintenance acidizing, and are reported as acidizing.

Please click the Add button to the right to enter Well Activities

Add

### Nearest Sensitive Receptor Located within 1,500 feet of well

Well Has Sensitive Receptor

Receptor Type

Receptor Distance to Well in feet

Receptor Facility Name

Address

City

Zip Code

### Certification Statement

Pursuant to SCAQMD Rule 1148.2(d), this form shall be submitted to the District no more than 10 days and no less than 24 hours prior to the start of well drilling, well completion, or well rework. If the start date(s) of subject activities is modified, the owner or operator shall notify the District at least 24 hours prior to the new start date if modified to occur earlier than the original start date, or within 24 hours prior to the original start date if modified to occur after the original start date, or if the original start date is cancelled. By clicking the checkbox below, I certify that I am the duly-authorized person to submit this form. I hereby attest, to the best of my knowledge, that the information contained herein is true, accurate and complete. With regard to information that I do not have personal knowledge of, I hereby attest that I have accurately entered the information contained herein from authorized personnel who represented that the information is true, accurate and complete.

I Agree to the above Certification Statement \*

# R1148.2 (d) Notification

## User Information

EForm Status

COMPLETED

Date Stored

07/24/2020

Time Stored

12:32 PM

## Notification Type

Notification Type\*

ORIGINAL

Has this Previous Event ID Been superseded?

Previous Event ID for Cancellation, Revision Date or Other

## Operator Information

Event ID

6686

Facility ID\*

98158

Facility Name\*

PACIFIC COAST ENERGY COMPANY LP

Operator Name\*

PCECLP

## Extension Information

New extended date and time for well activity to begin

Number of previously requested extensions requested under the original notification

## Well Information

Well Name /ID\*

WP 40

API Well Number\*

04-037-21284

Well Type\*

OIL

Well Geographical Coordinates (NAD 83 Format)

Well Latitude\*

34.055538

County\*

LOS ANGELES

Well Longitude\*

-118.390195

Zip Code\*

90035

Start Date and Time

07/28/2020 12:00:00 AM

City

LOS ANGELES

## Description of Well Activities

Select all that apply. If conducting a series of, or any combination of well production stimulation or treatment activities, identify all types of well production stimulation or treatment activity conducted.

Please click the Add button to the right to enter Well Activities

Add

Well Activity

WELL REWORK

Type of Drilling

Acidizing\*

Hydraulic Fracturing

Gravel Packing

Maintenance Acidizing

Matrix Acidizing

Acid Fracturing

Other (Please List)

\* Prior to April 2014, notifications did not distinguish between matrix and maintenance acidizing, and are reported as acidizing.

### Nearest Sensitive Receptor Located within 1,500 feet of well

Well Has Sensitive Receptor

Receptor Type

Receptor Distance to Well in feet

Receptor Facility Name

Address

City

Zip Code

### Certification Statement

Pursuant to SCAQMD Rule 1148.2(d), this form shall be submitted to the District no more than 10 days and no less than 24 hours prior to the start of well drilling, well completion, or well rework. If the start date(s) of subject activities is modified, the owner or operator shall notify the District at least 24 hours prior to the new start date if modified to occur earlier than the original start date, or within 24 hours prior to the original start date if modified to occur after the original start date, or if the original start date is cancelled. By clicking the checkbox below, I certify that I am the duly-authorized person to submit this form. I hereby attest, to the best of my knowledge, that the information contained herein is true, accurate and complete. With regard to information that I do not have personal knowledge of, I hereby attest that I have accurately entered the information contained herein from authorized personnel who represented that the information is true, accurate and complete.

I Agree to the above Certification Statement \*

# R1148.2 (d) Notification

## User Information

EForm Status

COMPLETED

Date Stored

10/06/2021

Time Stored

10:21 AM

## Notification Type

Notification Type\*

ORIGINAL

Has this Previous Event ID Been superseded?

Previous Event ID for Cancellation, Revision Date or Other

## Operator Information

Event ID

6935

Facility ID\*

98158

Facility Name\*

PACIFIC COAST ENERGY COMPANY LP

Operator Name\*

PCEC

## Extension Information

New extended date and time for well activity to begin

Number of previously requested extensions requested under the original notification

## Well Information

Well Name /ID\*

WP 40

API Well Number\*

04-037-21284

Well Type\*

OIL

Well Geographical Coordinates (NAD 83 Format)

Well Latitude\*

34.055538

County\*

LOS ANGELES

Well Longitude\*

-118.390195

Zip Code\*

90035

Start Date and Time

10/11/2021 12:00:00 AM

City

LOS ANGELES

## Description of Well Activities

Select all that apply. If conducting a series of, or any combination of well production stimulation or treatment activities, identify all types of well production stimulation or treatment activity conducted.

Please click the Add button to the right to enter Well Activities

Add

Well Activity

WELL REWORK

Acidizing\*

Hydraulic Fracturing

Type of Drilling

Gravel Packing

Maintenance Acidizing

Matrix Acidizing

Acid Fracturing

Other (Please List)

\* Prior to April 2014, notifications did not distinguish between matrix and maintenance acidizing, and are reported as acidizing.

### Nearest Sensitive Receptor Located within 1,500 feet of well

Well Has Sensitive Receptor

Receptor Type

Receptor Distance to Well in feet

Receptor Facility Name

Address

City

Zip Code

### Certification Statement

Pursuant to SCAQMD Rule 1148.2(d), this form shall be submitted to the District no more than 10 days and no less than 24 hours prior to the start of well drilling, well completion, or well rework. If the start date(s) of subject activities is modified, the owner or operator shall notify the District at least 24 hours prior to the new start date if modified to occur earlier than the original start date, or within 24 hours prior to the original start date if modified to occur after the original start date, or if the original start date is cancelled. By clicking the checkbox below, I certify that I am the duly-authorized person to submit this form. I hereby attest, to the best of my knowledge, that the information contained herein is true, accurate and complete. With regard to information that I do not have personal knowledge of, I hereby attest that I have accurately entered the information contained herein from authorized personnel who represented that the information is true, accurate and complete.

I Agree to the above Certification Statement \*

# R1148.2 (d) Notification

## User Information

EForm Status

COMPLETED

Date Stored

10/25/2021

Time Stored

9:20 AM

## Notification Type

Notification Type\*

ORIGINAL

Has this Previous Event ID Been superseded?

Previous Event ID for Cancellation, Revision Date or Other

## Operator Information

Event ID

6948

Facility ID\*

98158

Facility Name\*

PACIFIC COAST ENERGY COMPANY LP

Operator Name\*

PCEC

## Extension Information

New extended date and time for well activity to begin

Number of previously requested extensions requested under the original notification

## Well Information

Well Name /ID\*

WP 58

API Well Number\*

04-037-26615

Well Type\*

OIL

Well Geographical Coordinates (NAD 83 Format)

Well Latitude\*

34.05546951

County\*

LOS ANGELES

Well Longitude\*

-118.39039612

Zip Code\*

90035

Start Date and Time

10/28/2021 12:00:00 AM

City

LOS ANGELES

## Description of Well Activities

Select all that apply. If conducting a series of, or any combination of well production stimulation or treatment activities, identify all types of well production stimulation or treatment activity conducted.

Please click the Add button to the right to enter Well Activities

Add

Well Activity

WELL REWORK

Acidizing\*

Hydraulic Fracturing

Type of Drilling

Gravel Packing

Maintenance Acidizing

Matrix Acidizing

Acid Fracturing

Other (Please List)

\* Prior to April 2014, notifications did not distinguish between matrix and maintenance acidizing, and are reported as acidizing.

### Nearest Sensitive Receptor Located within 1,500 feet of well

Well Has Sensitive Receptor

Receptor Type

Receptor Distance to Well in feet

Receptor Facility Name

Address

City

Zip Code

### Certification Statement

Pursuant to SCAQMD Rule 1148.2(d), this form shall be submitted to the District no more than 10 days and no less than 24 hours prior to the start of well drilling, well completion, or well rework. If the start date(s) of subject activities is modified, the owner or operator shall notify the District at least 24 hours prior to the new start date if modified to occur earlier than the original start date, or within 24 hours prior to the original start date if modified to occur after the original start date, or if the original start date is cancelled. By clicking the checkbox below, I certify that I am the duly-authorized person to submit this form. I hereby attest, to the best of my knowledge, that the information contained herein is true, accurate and complete. With regard to information that I do not have personal knowledge of, I hereby attest that I have accurately entered the information contained herein from authorized personnel who represented that the information is true, accurate and complete.

I Agree to the above Certification Statement \*