

Communication from Public

Name: Pico Robertson Health and Safety Coalition

Date Submitted: 03/15/2023 02:29 PM

Council File No: 21-1025

Comments for Public Posting: Please see the appended email sent to CD5 on March 15, 2023. THIS EMAIL DOCUMENTS TWELVE (12) MORE UNAPPROVED OIL PROJECTS - "MAINTENANCE ACIDIZATION" - EXECUTED AT THE HILLCREST, RANCHO PARK, AND SAN VICENTE DRILL SITES IN CD5 FROM 2013 TO 2021. * Along with the dozens of illegal unapproved projects executed at West Pico, these additional illegal unapproved projects constitute even greater cumulative impact from the City's ongoing failure to enforce City Code and Regulations at Drill Sites in CD5.

Subject: Unapproved "Maintenance Acidization" Projects at Hillcrest, Rancho Park, and San Vicente Drill Sites

From:

Date: 3/15/2023, 2:04 PM

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

Dear Gary, Kristen, and Katy

In addition to the ten (10) unapproved "maintenance acidization" projects on oil wells at West Pico I documented for you on March 3, 2023, and the dozens more illegal oil well projects previously documented at West Pico, and in addition to the eight (8) new unapproved oil well projects initiated at Drill Sites in CD5 in fall 2022, **I have also documented twelve (12) more illegal unapproved "maintenance acidization" projects conducted at the Hillcrest, Rancho park, and San Vicente Drill Sites from 2013 to 2022.**

Here is a list of the illegal unapproved "maintenance acidization" projects at Hillcrest, Rancho Park, and San Vicente, grouped by Drill Site. All Drill Sites are in CD5. Documentation from SCAQMD for each project is attached.

None of these projects were submitted to the ZA for approval, as required by City Code sections 13.01.H and 13.01.I, which were in force throughout the time period.

None were reviewed by the ZA. None were approved by the ZA, which makes them illegal under City Code. None were given CEQA clearance of any kind, which makes them continuing violations of CEQA.

- **Five (5) illegal unapproved "maintenance acidization" projects were executed at the Hillcrest Drill Site (1 mile from West Pico) on these wells and dates**
 - 11/4/13 API # 0403701052
 - 7/15/15 API # 0403717576
 - 1/18/19 API # 0403717984
 - 10/30/19 API# 0403700110
 - 7/27/20 API # 0403717600
- **Three (3) illegal unapproved "maintenance acidization" projects were executed at the Rancho Park Drill Site (1 1/2 miles from West Pico) on these wells and dates:**
 - 12/11/17 API # 0403700149
 - 11/19/18 API # 0403717588
 - 12/5/18 API # 0403717588
- **Four (4) illegal unapproved "maintenance acidization" projects were executed at he San Vicente Drill Site behind the Beverly Center Mall and across San Vicente Blvd from Cedars Sinai Hospital (1 1/2 miles from West Pico) on these wells and dates:**
 - 12/17/18 API # 0403721346

- 1/22/19 API # 0403721346
- 8/7/19 API # 0403721386
- 3/3/22 API # 0403721315

As you know from my March 3, 2023 email to you, the Chief ZA issued [ZA-2022-8997-ZAI](#) on January 17, 2023 (copy attached). That document reviewed definitions of what the City Code means and has meant by the phrase "maintain an oil well," how the ZA has handled Code requirements to get discretionary ZA review and approval of oil well maintenance projects in the past, and how the ZA will handle it in the future.

The Chief ZA declared that oil well maintenance projects, typified by "acid maintenance," had been "reviewed and determined" by the ZA on a "case by case basis" for "decades" under LAMC 13.01.H and 13.01.I.

The Chief ZA also declared that such projects have required and still require discretionary review and CEQA evaluation in order to mitigate impacts, insofar as they are allowed at all.

Until January 18, 2023, Code section 13.01.I expressly prohibited unapproved maintenance projects, and the Chief ZA quoted that section of the Code (which had been in force since at least 1955).

Please note these important points about the severity of this problem in CD5:

- In CD5 (including West Pico, Hillcrest, Rancho Park, and San Vicente), a grand total of twenty-three (22) unapproved "maintenance acidization" projects have been executed without ZA approvals since SCAQMD began requiring Notifications in 2013 (12 projects at Hillcrest, Rancho Park, and San Vicente; 10 more at West Pico).
- Five (5) unapproved "maintenance acidization" projects at Drill Sites in CD5 have been executed while the ZA and City Council have had open Drill Site cases on their desks, and oil companies do it anyway because, it seems, they expect the City to do nothing.
 - Two of the "maintenance acidization" projects at Rancho Park were executed in 2018 while the ZA had a review of Rancho Park open on his desk (ZA-1958-14560-PA1).
 - One of the "maintenance acidization" projects at West Pico was executed in July 2020, between the two ZA public hearings in the West Pico PA2 review.
 - Two more "maintenance acidization" projects were executed while NASE's CEQA appeal was on City Council's desk in October 2021.

Fortunately, City Council has the opportunity to begin remedying the problem "right now" by granting NASE's appeal to overturn the improper Categorical Exemption from environmental review at West Pico.

City Council can overturn the improper Categorical Exemption and send the West Pico Drill Site case back to the ZA with clear orders to do the review properly, thoroughly, and to implement the City Code's requirements, prohibitions, and penalties.

Until there is enforcement, the City's regulations and prohibitions will be meaningless.

Yours,

Prof. Michael Salman

— Attachments: —

Hillcrest - R1148.2 (d) Notification - PB 11-4-13 0403701052.pdf	318 KB
Hillcrest - R1148.2 (d) Notification - PB 7-15-15 0403717576.pdf	318 KB
Hillcrest - R1148.2 (d) Notification - PB 1-18-19 0403717984.pdf	336 KB
Hillcrest - R1148.2 (d) Notification - PB 10-30-19 0403700110.pdf	337 KB
Hillcrest - R1148.2 (d) Notification - PB 7-27-20 0403717600.pdf	353 KB
Rancho Park R1148.2 (d) Notification - PB 12-11-17 0403700149.pdf	336 KB
Rancho Park R1148.2 (d) Notification - PB 11-19-18 0403717588.pdf	337 KB
Rancho Park R1148.2 (d) Notification - PB 12-5-18 0403717588.pdf	337 KB
San Vicente COM - R1148.2 (d) Notification - PB 12-17-18 API 0403721346.pdf	337 KB
San Vicente COM - R1148.2 (d) Notification - PB 1-22-19 API 0403721346.pdf	337 KB
San Vicente COM - R1148.2 (d) Notification - PB 8-7-19 API 0403721386.pdf	338 KB
San Vicente COM - R1148.2 Notification PB - 3-3-22 API 0403721315.pdf	219 KB
ZA-2022-8997-ZAI-Well_Maintenance ZA guidance.pdf	813 KB

R1148.2 (d) Notification

User Information

EForm Status

COMPLETED

Date Stored

02/03/2015

Time Stored

5:56 PM

Operator Information

Event ID

957

Facility ID*

3061

Facility Name*

HILLCREST BEVERLY OIL CORP

Operator Name*

MIKE MCADAMS

Well Information

Well Name /ID*

BEVERLY HILLS COMMUNITY 1

API Well Number*

04-037-01052

Well Type*

OIL

Well Geographical Coordinates (NAD 83 Format)

Well Latitude*

34.05064078

County*

LOS ANGELES

Well Longitude*

-118.40449859

Zip Code*

90064

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*

11/04/2013

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

1420 AMBASSADOR STREET

Receptor Distance to Well in feet

Receiver Distance to Well in Feet

700

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

07/14/2015

Time Stored

1:58 PM

Operator Information

Event ID

3202

Facility ID*

3061

Facility Name*

HILLCREST BEVERLY OIL CORP

Operator Name*

EBB NATURAL RESOURCES

Well Information

Well Name /ID*

HILLCREST 1

API Well Number*

04-037-17576

Well Type*

OIL

Well Geographical Coordinates (NAD 83 Format)

Well Latitude*

34.05065672

County*

LOS ANGELES

Well Longitude*

-118.40450355

Zip Code*

90064

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*

07/15/2015

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

1420 AMBASSADOR ST

Receptor Distance to Well in feet

Receiver Distance to Well in Feet

700

City

LOS ANGELES

Zip Code

90064

Certification Statement

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I Agree to the above Certification Statement *

R1148.2 (d) Notification

User Information

EForm Status

COMPLETED

Date Stored

01/15/2019

Time Stored

9:29 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

5804

Facility ID*

3061

Facility Name*

HILLCREST BEVERLY OIL CORP

Operator Name*

HILLCREST BEVERLY OIL CORP

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*

U49-8

API Well Number*

04-037-17984

Well Type*

OIL

Well Geographical Coordinates (NAD 83 Format)

Well Latitude*

34.050743

County*

LOS ANGELES

Well Longitude*

-118.405311

Zip Code*

90064

Start Date and Time

01/18/2019 05:00:00 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)

TUBING FLUSH

* 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

1400

Receptor Facility Name

Address

1471 PEG PL

City

LOS ANGELES

Zip Code

90035

Certification Statement

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I Agree to the above Certification Statement *

R1148.2 (d) Notification

User Information

EForm Status

COMPLETED

Date Stored

10/28/2019

Time Stored

12:10 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

6302

Facility ID*

306T

Facility Name*

HILLCREST BEVERLY OIL CORP

Operator Name*

LOU ZYLSTRA

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*

OLYMPIC COMMUNITY 4

API Well Number*

04-037-00110

Well Type*

OIL

Well Geographical Coordinates (NAD 83 Format)

Well Latitude*

34.050695

County*

LOS ANGELES

Well Longitude*

-118.404425

Zip Code*

90064

Start Date and Time

10/30/2019 12:15:00 PM

City

WEST 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

RESIDENCE

Receptor Distance to Well in feet

1000

Receptor Facility Name

Address

10000 W PICO BLVD

City

LOS ANGELES

Zip Code

90064

Certification Statement

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I Agree to the above Certification Statement *

R1148.2 (d) Notification

User Information

EForm Status

COMPLETED

Date Stored

07/24/2020

Time Stored

5:02 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

6687

Facility ID*

3061

Facility Name*

HILLCREST BEVERLY OIL CORP

Operator Name*

HILLCREST BEVERLY OIL CORP

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*

U47-2

API Well Number*

04-037-17600

Well Type*

OIL

Well Geographical Coordinates (NAD 83 Format)

Well Latitude*

34.050675

County*

LOS ANGELES

Well Longitude*

-118.405296

Zip Code*

90064

Start Date and Time

07/27/2020 07:00:00 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

Gravel Packing

Maintenance Acidizing

Matrix Acidizing

Acid Fracturing

Other (Please List)

TUBING FLUSH

Type of Drilling

* 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

800

Receptor Facility Name

Address

9919 W PICO BLVD

City

LOS ANGELES

Zip Code

90035

Certification Statement

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I Agree to the above Certification Statement *

R1148.2 (d) Notification

User Information

EForm Status

COMPLETED

Date Stored

12/08/2017

Time Stored

1:47 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

4677

Facility ID*

13627

Facility Name*

HILLCREST BEVERLY OIL CORP

Operator Name*

HILLCREST BEVERLY OIL CORPORATION

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*

RANCHO PARK 3

API Well Number*

04-037-00149

Well Type*

OIL

Well Geographical Coordinates (NAD 83 Format)

Well Latitude*

34.0455439

County*

LOS ANGELES

Well Longitude*

-118.41251272

Zip Code*

90064

Start Date and Time

12/11/2017 06:30:00 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.

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

1111

Receptor Facility Name

Address

10376 ALMAYO AVE

City

LOS ANGELES

Zip Code

90064

Certification Statement

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I Agree to the above Certification Statement *

R1148.2 (d) Notification

User Information

EForm Status

COMPLETED

Date Stored

11/16/2018

Time Stored

6:10 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

5691

Facility ID*

13627

Facility Name*

HILLCREST BEVERLY OIL CORP

Operator Name*

ERB NATURAL RESOURCES

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*

RP-5

API Well Number*

04-037-17588

Well Type*

OIL

Well Geographical Coordinates (NAD 83 Format)

Well Latitude*

34.04555133

County*

LOS ANGELES

Well Longitude*

-118.41249622

Zip Code*

90064

Start Date and Time

11/19/2018 05:00:00 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)

TUBING FLUSH

* 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

1111

Receptor Facility Name

Address

10376 ALMAYO AVE

City

LOS ANGELES

Zip Code

90064

Certification Statement

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I Agree to the above Certification Statement *

R1148.2 (d) Notification

User Information

EForm Status

COMPLETED

Date Stored

12/17/2018

Time Stored

3:30 PM

Notification Type

Notification Type*

REVISION OTHER

Has this Previous Event ID Been superseded?

N

Previous Event ID for Cancellation, Revision Date or Other

5729

Operator Information

Event ID

5770

Facility ID*

13627

Facility Name*

HILLCREST BEVERLY OIL CORP

Operator Name*

ERB NATURAL RESOURCES

Extension Information

New extended date and time for well activity to begin

Number of previously requested extensions requested under the original notification

0

Well Information

Well Name /ID*

RANCHO PARK #5

API Well Number*

04-037-17588

Well Type*

OIL

Well Geographical Coordinates (NAD 83 Format)

Well Latitude*

34.04555133

County*

LOS ANGELES

Well Longitude*

-118.41249622

Zip Code*

90064

Start Date and Time

12/05/2018 08:45:00 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*

Type of Drilling

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

1111

Receptor Facility Name

Address

10376 ALMAYO AVE

City

LOS ANGELES

Zip Code

90064

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

12/14/2018

Time Stored

9:11 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

5769

Facility ID*

187509

Facility Name*

E&B NATURAL RESOURCES COLR;

Operator Name*

E&B NATURAL RESOURCES

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*

5-65

API Well Number*

04-037-21346

Well Type*

OIL

Well Geographical Coordinates (NAD 83 Format)

Well Latitude*

34.07526779

County*

LOS ANGELES

Well Longitude*

-118.377899

Zip Code*

90048

Start Date and Time

12/17/2018 06:00:00 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)

TUBING FLUSH

* 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

HOSPITAL

Receptor Distance to Well in feet

150

Receptor Facility Name

CEDARS-SINAI

Address

8700 BEVERLY BLVD

City

LOS ANGELES

Zip Code

90048

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

01/19/2019

Time Stored

7:26 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

5809

Facility ID*

187509

Facility Name*

E&B NATURAL RESOURCES COLR;

Operator Name*

E&B NATURAL RESOURCES

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*

5-65

API Well Number*

04-037-21346

Well Type*

OIL

Well Geographical Coordinates (NAD 83 Format)

Well Latitude*

34.07526729

County*

LOS ANGELES

Well Longitude*

-118.37789917

Zip Code*

90048

Start Date and Time

01/22/2019 05:00:00 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.

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

HOSPITAL

Receptor Distance to Well in feet

150

Receptor Facility Name

CEDARS-SINAI MEDICAL CENTER

Address

8700 BEVERLY BLVD

City

LOS ANGELES

Zip Code

90048

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

08/07/2019

Time Stored

6:11 PM

Notification Type

Notification Type *

EXTENSION

Has this Previous Event ID Been superseded?

N

Previous Event ID for Cancellation, Revision Date or Other

6150

Operator Information

Event ID

6153

Facility ID *

187509

Facility Name *

E&B NATURAL RESOURCES COLR;

Operator Name *

E&B NATURAL RESOURCES

Extension Information

New extended date and time for well activity to begin

08/09/2019 04:59:00 PM

Number of previously requested extensions requested under the original notification

0

Well Information

Well Name /ID *

5-74

API Well Number *

04-037-21386

Well Type *

OIL

Well Geographical Coordinates (NAD 83 Format)

Well Latitude *

34.075402

County *

LOS ANGELES

Well Longitude *

-118.378111

Zip Code *

90048

Start Date and Time

08/07/2019 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

Type of Drilling

Acidizing*

Hydraulic Fracturing

Gravel Packing

Maintenance Acidizing

Matrix Acidizing

Acid Fracturing

Other (Please List)

TUBING FLUSH

* 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

HOSPITAL

Receptor Distance to Well in feet

300

Receptor Facility Name

CEDAR SINAI

Address

444 S SAN VICENTE BLVD

City

LOS ANGELES

Zip Code

90048

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
02/28/2022

Time Stored
2:39 PM

Notification Type

Notification Type *
ORIGINAL

Has this Previous Event ID Been superseded?

Operator Information

Event ID
7027

Facility ID *
187509

Facility Name *
E&B NATURAL RESOURCES MGMT CORP

Operator Name *
E&B NATURAL RESOURCES

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 *
S-62

Well Type *
OIL

County *
LOS ANGELES

Zip Code *
90048

City
LOS ANGELES

API Well Number *
04-037-21315

Well Geographical Coordinates (NAD 83 Format)

Well Latitude *
34.07511902

Well Longitude *
-118.37757874

Start Date and Time
03/03/2022 06:00:00 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

Well Activity
WELL REWORK

- 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
HOSPITAL

Receptor Distance to Well in feet
300

Receptor Facility Name
CEDARS-SINAI

Address
8700 BEVERLY BLVD

City
LOS ANGELES

Zip Code
90048

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 *

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

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DEPUTY DIRECTOR

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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).¹
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".²

¹ 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>

² 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 health³, 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.⁴ 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.

³ "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.

⁴ "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 well⁵; 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

⁵ Well Permit Information portal, California Geologic Energy Management Division online website, July 2022, 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 90th 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