

Communication from Public

Name: DJ Moore
Date Submitted: 03/25/2025 09:59 AM
Council File No: 24-1580
Comments for Public Posting: Please see attached comment letter.

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March 25, 2025

Planning Land Use Management Committee
Los Angeles City Council
John Ferraro Council Chamber
200 North Spring Street, Room 340, City Hall
Los Angeles, CA 90012

Re: Oil Well Acid Washing Interim Control Ordinance - March 25, 2025, Agenda
Item No. 5 (Council File No. 24-1580)

Dear Chair Blumenfield and Honorable Councilmembers:

We write on behalf of Warren E&P (“Warren”), which operates the existing, operating oil field generally located at 625 East Anaheim Street in Wilmington. Warren utilizes maintenance acid washes to restore normal well productivity and ensure safe operations, which it appears would be affected by the potential Interim Control Ordinance (“ICO”) being proposed for consideration by the PLUM Committee. Warren appreciates the opportunity to comment on the above-referenced motion (“Motion”) concerning the proposed ICO and urges the Committee to direct City staff to conduct additional outreach and to collect and consider technical evidence about the acid wash process before a draft ordinance is presented for further consideration.

Earlier this year, Warren and other parties entered into a settlement agreement with the City through a Stipulation for Entry of Judgment and Writ in the case *Warren E&P, Inc., et. al. v. City of Los Angeles, et. al.* (Sup. Ct. Case No. 23STCP00060) (“Settlement Agreement”). The parties entered into that Settlement Agreement after the Court concluded that the City exceeded its authority when it adopted an ordinance to regulate oil and gas production activities that included prohibitions on maintenance acid washes. The Settlement Agreement limits the City’s ability to adopt a new ordinance that would similarly regulate oil production and maintenance activities, including acid washing, unless the City complies with certain procedural processes. Specifically, and pursuant to the Settlement Agreement, the City is obligated to conduct two stakeholder meetings and present draft ordinance language to stakeholders for comment at least 60 days prior to the City Planning Commission’s consideration of a draft ordinance related to the drilling of new wells, any prohibitions on maintenance activities, including maintenance acid washes, or the drilling, re-drilling, or deepening of existing wells. As the ICO and new oil well ordinance referenced in the Motion would regulate the drilling and maintenance of oil wells,

including prohibiting maintenance acid washing activities, the City must comply with the Settlement Agreement before adopting these new ordinances.

We also appreciate the opportunity to address misconceptions regarding maintenance acid washes and their perceived danger. While we recognize the City's desire to address stakeholder concerns, we want to clarify that certain statements made in the Motion do not accurately describe the nature of the maintenance activities the Motion seeks to regulate. Specifically:

- ***Maintenance acid washes are low-risk well maintenance activities*** routinely used to restore normal well productivity and ensure safe operations by pumping a dilute acid solution (typically weak hydrochloric acid) down the wellbore to dissolve mineral scale, rust, or minor geologic blockages that build up over time.¹ Unlike hydraulic fracturing, which injects fluids at high pressure to crack rock, maintenance acid washing uses low pump pressures that do not fracture the formation.² The acid primarily cleans the wellbore and near-well rock, which improves flow without altering the geologic structure. Importantly, the acid is neutralized underground by reacting with minerals in the geological formation.³ Independent scientific assessments confirm that injected acid is largely neutralized near the wellbore, meaning it does not migrate out of the well and is not left in an active hazardous state.⁴ Further for Warren's operations, the acid is handled in a closed system. The acid is transported in sealed containers, injected directly into a well and then remains in the injection zone. The process is entirely contained, with the spent and neutralized acid remaining confined in the injection reservoir along with the produced water.
- ***Maintenance acid washes are subject to multiple layers of regulation.*** The California Geologic Energy Management Division ("CalGEM") regulates the design, operation, and maintenance of oil wells in California, including safety requirements, casing integrity, and well integrity verification.⁵ SCAQMD Rule 1148.2 requires operators to notify SCAQMD before conducting acid washing, and to report all chemicals used and mandates public transparency, including advance notification to sensitive receptors (schools, homes, hospitals within 1,500 feet). LAFD reviews and

¹ CCST (California Council on Science and Technology). "An Independent Scientific Assessment of Well Stimulation in California," Volume II. 2015. <https://ccst.us/reports/well-stimulation/>; API Guidance Document HF2. Hydraulic Fracturing Operations – Well Construction and Integrity Guidelines. <https://www.api.org>.

² CCST, Volume II, Chapter 3. <https://ccst.us/wp-content/uploads/160708-sb4-vol-II-3-1.pdf>.

³ API HF2, Section 4.3 – Chemistry of Acid Reactions.

⁴ CCST Volume II, Chapter 7. <https://ccst.us/wp-content/uploads/160708-sb4-vol-II-7.pdf>.

⁵ CalGEM, DOGGR Regulations. <https://www.conservation.ca.gov/calgem>.

approves hazardous material storage, spill containment, and fire suppression systems to ensure acid is safely handled and stored according to the California Fire Code.

- ***The safety of maintenance acid washes is supported by data and scientific studies.*** California's independent scientific review found no evidence of groundwater contamination or other environmental harm from properly executed acid washing treatments.⁶ Academic research confirms that maintenance acid washes use smaller volumes and lower concentrations than more intensive treatments, and pose minimal risk when conducted under standard controls.

We understand that the City Council hopes to address community concerns related to oil production, but want to urge the City to rely on science-based evidence when determining which policies will best serve all interests. Warren looks forward to working with City staff to develop policies that balance the City's desire to further regulate oil and gas production activities with the vested property rights afforded to Warren and other existing oil and gas production facility operators.

Very truly yours,



Duncan Joseph Moore
of LATHAM & WATKINS LLP

⁶ CCST Volume II, Chapter 7. <https://ccst.us/wp-content/uploads/160708-sb4-vol-II-7.pdf>.

Communication from Public

Name: STAND-LA Coalition

Date Submitted: 03/25/2025 10:07 AM

Council File No: 24-1580

Comments for Public Posting: Dear Planning and Land Use Management Committee Members, The STAND-LA Coalition (Stand Together Against Neighborhood Drilling - Los Angeles) is writing to urge you to pass the motion regarding acid maintenance, CF 24-1580, at the Planning and Land Use Management hearing on March 25th, 2025. Our organizations represent frontline communities in South Los Angeles and Wilmington that have been fighting for over a decade to halt the toxic extraction of oil in our neighborhoods and whose communities have been disproportionately impacted by the recent uptick in acid maintenance at drill sites. Under the phaseout ordinance passed in December 2022, no oil wells were allowed to 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”. Acid maintenance was defined as maintenance in the Zoning Administrator’s Interpretation on Well Maintenance, which was released in October 2023. This meant that acid maintenance was prohibited while the phaseout ordinance was in effect. However, when the phaseout ordinance was struck down in September 2024, the City was no longer able to enforce the regulations on acid maintenance. From October 4th, 2023 - September 1st, 2024, there were no instances of acid maintenance in the City of LA. However, from September 2nd, 2024 - March 12th, 2025, after the ordinance was struck down, there were 32 notices of acid maintenance from operators to the South Coast AQMD. This dramatic increase is due to the City’s inability to enforce the ban on acid maintenance after the ordinance was struck down. Additionally, during the devastating wildfires that recently ravaged Los Angeles, 17 different notices for acid maintenance were issued by operators in LA City (from 1/7/25-1/31/25), adding even more toxins to the already highly toxic air resulting from the wildfires. Acid maintenance (or acidizing) is a well-stimulation technique that uses thousands of gallons of strong acids, like hydrofluoric or hydrochloric acid, to dissolve rock formations and clean out wellbores. This process helps oil flow more easily, extending the life of aging wells—many of which are in densely populated areas like LA, posing severe risks to public health and the environment. Many of the chemicals used during acid maintenance, including xylene, polyethyl benzenes,

and methanol, are linked to long-term health impacts, including endocrine disruption, cancer, and birth defects. Despite these negative health impacts, acid maintenance at drill sites continues with little oversight, disproportionately impacting frontline communities—many of whom already suffer from higher rates of respiratory illnesses, cancers, and other chronic conditions due to oil extraction operations. The release of hazardous pollutants from acidizing treatments contributes to worsening air quality, endangering residents who live, work, and go to school near these sites. Allowing this practice to continue runs counter to Los Angeles' commitment to environmental justice and public health protection. Given the recent setback in the fight to phase out oil drilling, we must take every available measure to prevent further harm to our communities. We urge the committee to pass the acid maintenance motion. The health and safety of our residents should not be compromised for the benefit of fossil fuel companies. We need bold leadership to protect frontline communities from preventable harm. Sincerely, Emma Silber, Co-Coordinator, STAND-LA Coalition Maro Kakoussian, Director of Climate and Health Programs Physicians for Social Responsibility Los Angeles, Co-Chair of STAND-LA Tianna Shaw-Wakeman, Environmental Justice Program Manager Black Women for Wellness Wendy Miranda, Policy Associate Esperanza Community Housing Richard Parks, President Redeemer Community Partnership Reverend Louis Chase, Minister of Community Outreach Holman United Methodist Church Roberto Cabrales, SoCal Program Co-Director Communities for a Better Environment, Co-Chair of STAND-LA Agustin Cabrera, Policy Director Strategic Concepts in Organizing and Policy Education (SCOPE)



March 24, 2025

Los Angeles City Council
200 N Spring Street
Los Angeles, CA 90012

Dear Planning and Land Use Management Committee Members,

The STAND-LA Coalition (Stand Together Against Neighborhood Drilling - Los Angeles) is writing to urge you to pass the motion regarding acid maintenance, [CF 24-1580](#), at the Planning and Land Use Management hearing on March 25th, 2025. Our organizations represent frontline communities in South Los Angeles and Wilmington that have been fighting for over a decade to halt the toxic extraction of oil in our neighborhoods and whose communities have been disproportionately impacted by the recent uptick in acid maintenance at drill sites.

Under the [phaseout ordinance](#) passed in December 2022, no oil wells were allowed to 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”. Acid maintenance was defined as maintenance in the Zoning Administrator’s [Interpretation on Well Maintenance](#), which was released in October 2023. This meant that acid maintenance was prohibited while the phaseout ordinance was in effect. However, when the phaseout ordinance was struck down in September 2024, the City was no longer able to enforce the regulations on acid maintenance. From October 4th, 2023 - September 1st, 2024, there were [no instances](#) of acid maintenance in the City of LA. However, from September 2nd, 2024 - March 12th, 2025, after the ordinance was struck down, there were [32 notices](#) of acid maintenance from operators to the South Coast AQMD. This dramatic increase is due to the City’s inability to enforce the ban on acid maintenance after the ordinance was struck down.

Additionally, during the devastating wildfires that recently ravaged Los Angeles, [17 different notices](#) for acid maintenance were issued by operators in LA City (from 1/7/25-1/31/25), adding even more toxins to the already highly toxic air resulting from the wildfires.

Acid maintenance (or acidizing) is a well-stimulation technique that uses thousands of gallons of strong acids, like hydrofluoric or hydrochloric acid, to dissolve rock formations and clean out wellbores. This process helps oil flow more easily, extending the life of aging wells—many of which are in densely populated areas like LA, posing severe risks to public health and the environment.

Many of the chemicals used during acid maintenance, including xylene, polyethyl benzenes, and methanol, are linked to long-term health impacts, including [endocrine disruption](#), [cancer](#), and [birth defects](#). Despite these negative health impacts, acid maintenance at drill sites continues with little oversight, disproportionately impacting frontline communities—many of whom already suffer from higher rates of respiratory illnesses, cancers, and other chronic conditions due to oil extraction operations. The release of hazardous pollutants from acidizing treatments contributes to worsening air quality, endangering residents who live, work, and go to school near these sites.

Allowing this practice to continue runs counter to Los Angeles' commitment to environmental justice and public health protection. Given the recent setback in the fight to phase out oil drilling, we must take every available measure to prevent further harm to our communities. We urge the committee to pass the acid maintenance motion. The health and safety of our residents should not be compromised for the benefit of fossil fuel companies. We need bold leadership to protect frontline communities from preventable harm.

Sincerely,

Emma Silber, Co-Coordinator, STAND-LA Coalition

Maro Kakoussian, Director of Climate and Health Programs
Physicians for Social Responsibility Los Angeles, Co-Chair of STAND-LA

Tianna Shaw-Wakeman, Environmental Justice Program Manager
Black Women for Wellness

Wendy Miranda, Policy Associate
Esperanza Community Housing

Richard Parks, President
Redeemer Community Partnership

Reverend Louis Chase, Minister of Community Outreach
Holman United Methodist Church

Roberto Cabrales, SoCal Program Co-Director
Communities for a Better Environment, Co-Chair of STAND-LA

Agustin Cabrera, Policy Director
Strategic Concepts in Organizing and Policy Education (SCOPE)

E&B and Warren E&P Notice to Residents:

AVISO DE ACTIVIDADES DE MANTENIMIENTO

En cumplimiento y según lo exigido por la Norma 1148.2 (d)(10) del Distrito de Gestión de la Calidad del Aire de la Costa Sur ("SCAQMD"), Requisitos de Notificación e Informes para Pozos de Petróleo y Gas y Proveedores de Sustancias Químicas, por la presente se le notifica que se llevará a cabo un mantenimiento rutinario de pozos



¿POR QUÉ ESTOY RECIBIENDO ESTE AVISO?

Recibe este aviso porque vive cerca de nuestras actividades de mantenimiento. Para asegurarnos de que estamos produciendo el único petróleo compatible con el clima en el mundo y siguiendo todas las regulaciones estatales, federales y locales, se realiza un mantenimiento regular para garantizar que nuestras instalaciones sigan operando de manera segura, eficiente y de acuerdo con las regulaciones estatales. Como su proveedor de energía comunitaria, estamos comprometidos a mantener los más altos estándares de salud y seguridad, y a reducir aún más, nuestra dependencia del petróleo extranjero.

Owner and Operator of Wells:	E&B Natural Resources 18471 Mt. Langley Street, Suite P, Fountain Valley, CA 92708 714-968-4770		
Well Name(s) and API Well Numbers:	S-14;037-20835 S-23;037-20989	S-59;037-21248 S-80;037-22187	S-84;037-21071 S-93;037-23770
Geographic Well Coordinates:	34.0750818/-118.3780764		
Projected Start Date(s) and Time(s):	ON OR AFTER 1/6/2025 6:00am	ON OR AFTER 1/6/2025 6:00am	ON OR AFTER 1/6/2025 6:00am
Anticipated Chemicals to be Used:	Low-pH hydrochloric solvent, low-pH hydrofluoric solvent		

Para obtener más
información sobre estas
operaciones, escanee aquí:



https://www.cipa.org/files/public/SCAQMD_FAQ_2023_v4.pdf

¿Tiene preguntas sobre nuestras operaciones? Comuníquese llamando al teléfono 714-968-4770



NOTICE OF MAINTENANCE ACTIVITIES

In compliance with and as required by South Coast Air Quality Management District ("SCAQMD") Rule 1148.2 (d)(10), Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers, you are hereby notified that routine well maintenance will be conducted.

WHY AM I RECEIVING THIS NOTICE?

You are receiving this notice because you live within proximity to our maintenance activities. To ensure we are producing the world's only climate compliant oil and following all state, federal and local regulations, regular maintenance is conducted to ensure our facilities continue to operate safely, efficiently, and in accordance with state regulations. As your community energy producer, we are committed to upholding the highest health and safety standards, and further reducing our reliance on foreign oil.

Owner and Operator of Wells:	E&B Natural Resources 18471 Mt. Langley Street, Suite P, Fountain Valley, CA 92708 714-968-4770		
Well Name(s) and API Well Numbers:	S-14;037-20835 S-23;037-20989	S-59;037-21248 S-80;037-22187	S-84;037-21071 S-93;037-23770
Geographic Well Coordinates:	34.0750818/-118.3780764		
Projected Start Date(s) and Time(s):	ON OR AFTER 1/6/2025 6:00am	ON OR AFTER 1/6/2025 6:00am	ON OR AFTER 1/6/2025 6:00am
Anticipated Chemicals to be Used:	Low-pH hydrochloric solvent, low-pH hydrofluoric solvent		

Have questions about our operations? Give us a call at 714-968-4770



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To learn more about these
operations scan here:



https://www.cipa.org/files/public/SCAQMD_FAQ_2023_v4.pdf



625 E Anaheim

CA 90744

11/25/2024

Dear Resident:

Per South Coast Air Quality Management District Rule 1148.2 (d)(10), please be advised that an acidizing procedure for an oil and gas or water injection well is scheduled to take place.

Querido Residente:

De acuerdo con la regla 1148.2 (d)(10) del South Coast Air Quality Management District, tenga en cuenta que está programado que se lleve a cabo un procedimiento de acidificación para un pozo de inyección de petróleo y gas o agua.

Projected Start Dates and Times/ Fechas y Horas de inicio proyectadas:

12/06/2024 @ 7 AM - 02/28/2025 @ 7 AM

Anticipated Chemicals to be Used / Sustancias Químicas Previstas Que Se Utilizarán:

- o Hydrochloric Acid (HCL)/Ácido Clorhídrico (HCl)
- o Xylene (CH₃)₂C₆H₄/Xylene (CH₃)₂C₆H₄
- o Hydrofluoric Acid (HF)/Ácido Fluorhídrico (HF)
- o These chemicals are commonly used in various household cleaners, pool treatments, and cough medicines. / Estos químicos se usan comúnmente en varios limpiadores domésticos, tratamientos para piscinas y medicamentos para la tos.

Questions regarding SCAQMD Rule 1148.2 can be addressed to the SCAQMD at 909-396-2000.

Las preguntas sobre la Regla 1148.2 de SCAQMD pueden dirigirse al Distrito al 909-396-2000.

Names/ Nombres	API	Coordinates/Coordenadas	Names/ Nombres	API	Coordinates/Coordenadas
WTU 2128 I	03726972	33.78204727 , -118.25547028	WTU 2274 I	03726976	33.78182983 , -118.25570679
WTU 2144 I	03730285	33.78236008 , -118.25547791	WTU 2296 I	03726625	33.78219223 , -118.25572968
WTU 2145	03727339	33.78272629 , -118.25547028	WTU 2301 I	03726692	33.78226471 , -118.25571442
WTU 2147I	03726556	33.78236008 , -118.25547791	WTU 2314 I	03726845	33.78247833 , -118.25572968
WTU 2162 I	03726661	33.78261948 , -118.25551605	WTU 2316 I	03726693	33.78251266 , -118.25572968
WTU 2163	03727126	33.78262329 , -118.25550079	WTU 2320 I	03726780	33.78258514 , -118.25576019
WTU 2170 I	03726743	33.78274536 , -118.25552368	WTU 2332	03726793	33.78275681 , -118.25485229
WTU 2186 I	03730291	33.7816925 , -118.25544739	WTU 2343 I	03726878	33.7816461 , -118.2556858
WTU 2187 I	03730399	33.78170776 , -118.25544739	WTU 2347I	03726907	33.78171921 , -118.25572205
WTU 2189 I	03726623	33.7817421 , -118.25544739	WTU 2349 I	03726905	33.78174591 , -118.25569153
WTU 2194 I	03726552	33.78182983 , -118.25547028	WTU 2353 I	03726622	33.78181839 , -118.25572968
WTU 2199 I	03726621	33.78190994 , -118.25547791	WTU 2373 I	03726620	33.78213882 , -118.25572205
WTU 2217 I	03730312	33.78220367 , -118.25548553	WTU 2384 I	03730080	33.78232193 , -118.2557373
WTU 2234 I	03726705	33.78248215 , -118.25550842	WTU 2387 I	03730172	33.78237152 , -118.25574493
WTU 2235	03727221	33.78249741 , -118.25550842	WTU 2392 I	03730123	33.78245163 , -118.25575256
WTU 2244 I	03726750	33.78265381 , -118.25553894	WTU 2396 I	03726846	33.78252029 , -118.25577545
WTU 2246I	03730395	33.78268051 , -118.25552368	WTU 2404 I	03726788	33.78265762 , -118.25578308
WTU 2248 I	03726746	33.78271866 , -118.25554657	WTU 2413	03726795	33.78279877 , -118.25577545
WTU 2254 I	03726751	33.78281784 , -118.2555542	WTU 2543 I	03726906	33.78164673 , -118.2556839
WTU 2263 I	03726879	33.78164673 , -118.25567627			

Should you have any questions or concerns, please contact Warren E & P, Inc at:

Si tiene alguna pregunta o inquietud, comuníquese con Warren E & P Inc. al:

(877)587-9494

Communication from Public

Name:

Date Submitted: 03/25/2025 10:41 AM

Council File No: 24-1580

Comments for Public Posting: Communities cannot wait any longer for their health and safety to be prioritized over toxic acid maintenance operations. We urge to pass the Acid Maintenance motion at the next Committee hearing AND we call on City Council to rescind the old oil phase out ordinance and pass a new ordinance as soon as possible.

Communication from Public

Name: dinah

Date Submitted: 03/25/2025 10:44 AM

Council File No: 24-1580

Comments for Public Posting: Our communities cannot wait any longer for their health and safety to be prioritized over toxic acid maintenance operations. We urge the committee to pass the Acid Maintenance motion at the next Committee hearing AND we call on City Council to rescind the old oil phase out ordinance and pass a new ordinance as soon as possible.

Communication from Public

Name: Brittany D. Rivas

Date Submitted: 03/25/2025 10:59 AM

Council File No: 24-1580

Comments for Public Posting: Honorable Committee, My name is Brittany Rivas and I work in District 15 in Wilmington. I really want to emphasize that our communities cannot wait any longer for their health and safety to be prioritized over toxic acid maintenance operations. We urge to pass the Acid Maintenance motion at the next Committee hearing AND we call on City Council to rescind the old oil phase out ordinance and pass a new ordinance as soon as possible. Please take these important steps to prioritize the health and safety of our frontline communities. Sincerely, Brittany Rivas

Communication from Public

Name: Nancy Lam

Date Submitted: 03/25/2025 11:55 AM

Council File No: 24-1580

Comments for Public Posting: I urge the Committee to move this motion forward in order to protect the health and safety of frontline residents from toxic acid maintenance at oil sites. Oil companies have taken advantage of the oil phaseout ordinance being overturned in September 2024 to issue 32 separate notices of acid maintenance in the City of LA from September 2nd 2024 - March 12th 2025. Acid maintenance is a well-stimulation technique that uses thousands of gallons of strong acids, like hydrofluoric or hydrochloric acid, to dissolve rock formations and clean out wellbores. Many of the chemicals used during acid maintenance, including xylene, polyethyl benzenes, and methanol, are linked to long-term health impacts, including endocrine disruption, cancer, and birth defects. Despite these negative health impacts, acid maintenance at drill sites continues with little oversight, disproportionately impacting frontline communities—many of whom already suffer from higher rates of respiratory illnesses, cancers, and other chronic conditions due to oil extraction operations. I urge the Committee to pass this motion and stand with frontline communities over oil industry profits. Health impacts: When looking through the chemical ingredients in the products used for acid maintenance, we can link nearly every ingredient to harmful impacts to human health including harm to the central nervous system, birth defects, cancers, or are endocrine disruptors. In the Zoning Administrator’s Interpretation on Well Maintenance, the Zoning Administrator writes that a scientific advisory panel found that “extraction activities may have negative external effects on the health and well-being of people within the vicinity of such operations”. Additionally, in a study from April 2017 that examined the “overlap of the type of chemicals and trade products used in hydraulic fracturing activities and routine maintenance acidizing projects... the study concluded that there is substantial overlap given the number of similar chemicals used during these activities.” From the ZAI: “Well maintenance activities, as described herein, may have 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.”

Weak Public Notice. The vacuous information provided to the public in oil company notifications. Cite E&B's notice as an example. The notifications do not provide a list of the chemicals used, the quantities ordered, and the health concerns associated with each. They do not provide same day certainty as to when acid maintenance will take place so residents can move their families out of harm's way. Previously, a Zoning Administrator could address these inadequacies in a Determination of Conditions.



March 24, 2025

Los Angeles City Council
200 N Spring Street
Los Angeles, CA 90012

Dear Planning and Land Use Management Committee Members,

The STAND-LA Coalition (Stand Together Against Neighborhood Drilling - Los Angeles) is writing to urge you to pass the motion regarding acid maintenance, [CF 24-1580](#), at the Planning and Land Use Management hearing on March 25th, 2025. Our organizations represent frontline communities in South Los Angeles and Wilmington that have been fighting for over a decade to halt the toxic extraction of oil in our neighborhoods and whose communities have been disproportionately impacted by the recent uptick in acid maintenance at drill sites.

Under the [phaseout ordinance](#) passed in December 2022, no oil wells were allowed to 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”. Acid maintenance was defined as maintenance in the Zoning Administrator’s [Interpretation on Well Maintenance](#), which was released in October 2023. This meant that acid maintenance was prohibited while the phaseout ordinance was in effect. However, when the phaseout ordinance was struck down in September 2024, the City was no longer able to enforce the regulations on acid maintenance. From October 4th, 2023 - September 1st, 2024, there were [no instances](#) of acid maintenance in the City of LA. However, from September 2nd, 2024 - March 12th, 2025, after the ordinance was struck down, there were [32 notices](#) of acid maintenance from operators to the South Coast AQMD. This dramatic increase is due to the City’s inability to enforce the ban on acid maintenance after the ordinance was struck down.

Additionally, during the devastating wildfires that recently ravaged Los Angeles, [17 different notices](#) for acid maintenance were issued by operators in LA City (from 1/7/25-1/31/25), adding even more toxins to the already highly toxic air resulting from the wildfires.

Acid maintenance (or acidizing) is a well-stimulation technique that uses thousands of gallons of strong acids, like hydrofluoric or hydrochloric acid, to dissolve rock formations and clean out wellbores. This process helps oil flow more easily, extending the life of aging wells—many of which are in densely populated areas like LA, posing severe risks to public health and the environment.

Many of the chemicals used during acid maintenance, including xylene, polyethyl benzenes, and methanol, are linked to long-term health impacts, including [endocrine disruption](#), [cancer](#), and [birth defects](#). Despite these negative health impacts, acid maintenance at drill sites continues with little oversight, disproportionately impacting frontline communities—many of whom already suffer from higher rates of respiratory illnesses, cancers, and other chronic conditions due to oil extraction operations. The release of hazardous pollutants from acidizing treatments contributes to worsening air quality, endangering residents who live, work, and go to school near these sites.

Allowing this practice to continue runs counter to Los Angeles' commitment to environmental justice and public health protection. Given the recent setback in the fight to phase out oil drilling, we must take every available measure to prevent further harm to our communities. We urge the committee to pass the acid maintenance motion. The health and safety of our residents should not be compromised for the benefit of fossil fuel companies. We need bold leadership to protect frontline communities from preventable harm.

Sincerely,

Emma Silber, Co-Coordinator, STAND-LA Coalition

Maro Kakoussian, Director of Climate and Health Programs
Physicians for Social Responsibility Los Angeles, Co-Chair of STAND-LA

Tianna Shaw-Wakeman, Environmental Justice Program Manager
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Reverend Louis Chase, Minister of Community Outreach
Holman United Methodist Church

Roberto Cabrales, SoCal Program Co-Director
Communities for a Better Environment, Co-Chair of STAND-LA

Agustin Cabrera, Policy Director
Strategic Concepts in Organizing and Policy Education (SCOPE)

E&B and Warren E&P Notice to Residents:

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En cumplimiento y según lo exigido por la Norma 1148.2 (d)(10) del Distrito de Gestión de la Calidad del Aire de la Costa Sur ("SCAQMD"), Requisitos de Notificación e Informes para Pozos de Petróleo y Gas y Proveedores de Sustancias Químicas, por la presente se le notifica que se llevará a cabo un mantenimiento rutinario de pozos



¿POR QUÉ ESTOY RECIBIENDO ESTE AVISO?

Recibe este aviso porque vive cerca de nuestras actividades de mantenimiento. Para asegurarnos de que estamos produciendo el único petróleo compatible con el clima en el mundo y siguiendo todas las regulaciones estatales, federales y locales, se realiza un mantenimiento regular para garantizar que nuestras instalaciones sigan operando de manera segura, eficiente y de acuerdo con las regulaciones estatales. Como su proveedor de energía comunitaria, estamos comprometidos a mantener los más altos estándares de salud y seguridad, y a reducir aún más, nuestra dependencia del petróleo extranjero.

Para obtener más
información sobre estas
operaciones, escanee aquí:



https://www.cipa.org/files/public/SCAQMD_FAQ_2023_v4.pdf

Owner and Operator of Wells:	E&B Natural Resources 18471 Mt. Langley Street, Suite P, Fountain Valley, CA 92708 714-968-4770		
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Anticipated Chemicals to be Used:	Low-pH hydrochloric solvent, low-pH hydrofluoric solvent		

¿Tiene preguntas sobre nuestras operaciones? Comuníquese llamando al teléfono 714-968-4770



NOTICE OF MAINTENANCE ACTIVITIES

In compliance with and as required by South Coast Air Quality Management District ("SCAQMD") Rule 1148.2 (d)(10), Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers, you are hereby notified that routine well maintenance will be conducted.

WHY AM I RECEIVING THIS NOTICE?

You are receiving this notice because you live within proximity to our maintenance activities. To ensure we are producing the world's only climate compliant oil and following all state, federal and local regulations, regular maintenance is conducted to ensure our facilities continue to operate safely, efficiently, and in accordance with state regulations. As your community energy producer, we are committed to upholding the highest health and safety standards, and further reducing our reliance on foreign oil.



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To learn more about these
operations scan here:



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Have questions about our operations? Give us a call at 714-968-4770





625 E Anaheim

CA 90744

11/25/2024

Dear Resident:

Per South Coast Air Quality Management District Rule 1148.2 (d)(10), please be advised that an acidizing procedure for an oil and gas or water injection well is scheduled to take place.

Querido Residente:

De acuerdo con la regla 1148.2 (d)(10) del South Coast Air Quality Management District, tenga en cuenta que está programado que se lleve a cabo un procedimiento de acidificación para un pozo de inyección de petróleo y gas o agua.

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- o These chemicals are commonly used in various household cleaners, pool treatments, and cough medicines. / Estos químicos se usan comúnmente en varios limpiadores domésticos, tratamientos para piscinas y medicamentos para la tos.

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Las preguntas sobre la Regla 1148.2 de SCAQMD pueden dirigirse al Distrito al 909-396-2000.

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WTU 2170 I	03726743	33.78274536 , -118.25552368	WTU 2332	03726793	33.78275681 , -118.25485229
WTU 2186 I	03730291	33.7816925 , -118.25544739	WTU 2343 I	03726878	33.7816461 , -118.2556858
WTU 2187 I	03730399	33.78170776 , -118.25544739	WTU 2347I	03726907	33.78171921 , -118.25572205
WTU 2189 I	03726623	33.7817421 , -118.25544739	WTU 2349 I	03726905	33.78174591 , -118.25569153
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Should you have any questions or concerns, please contact Warren E & P, Inc at:

Si tiene alguna pregunta o inquietud, comuníquese con Warren E & P Inc. al:

(877)587-9494

Communication from Public

Name: Nancy Lam

Date Submitted: 03/25/2025 11:56 AM

Council File No: 24-1580

Comments for Public Posting: I urge the Committee to move this motion forward in order to protect the health and safety of frontline residents from toxic acid maintenance at oil sites. Oil companies have taken advantage of the oil phaseout ordinance being overturned in September 2024 to issue 32 separate notices of acid maintenance in the City of LA from September 2nd 2024 - March 12th 2025. Acid maintenance is a well-stimulation technique that uses thousands of gallons of strong acids, like hydrofluoric or hydrochloric acid, to dissolve rock formations and clean out wellbores. Many of the chemicals used during acid maintenance, including xylene, polyethyl benzenes, and methanol, are linked to long-term health impacts, including endocrine disruption, cancer, and birth defects. Despite these negative health impacts, acid maintenance at drill sites continues with little oversight, disproportionately impacting frontline communities—many of whom already suffer from higher rates of respiratory illnesses, cancers, and other chronic conditions due to oil extraction operations. I urge the Committee to pass this motion and stand with frontline communities over oil industry profits. Health impacts: When looking through the chemical ingredients in the products used for acid maintenance, we can link nearly every ingredient to harmful impacts to human health including harm to the central nervous system, birth defects, cancers, or are endocrine disruptors. In the Zoning Administrator’s Interpretation on Well Maintenance, the Zoning Administrator writes that a scientific advisory panel found that “extraction activities may have negative external effects on the health and well-being of people within the vicinity of such operations”. Additionally, in a study from April 2017 that examined the “overlap of the type of chemicals and trade products used in hydraulic fracturing activities and routine maintenance acidizing projects... the study concluded that there is substantial overlap given the number of similar chemicals used during these activities.” From the ZAI: “Well maintenance activities, as described herein, may have 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.”

Weak Public Notice. The vacuous information provided to the public in oil company notifications. Cite E&B's notice as an example. The notifications do not provide a list of the chemicals used, the quantities ordered, and the health concerns associated with each. They do not provide same day certainty as to when acid maintenance will take place so residents can move their families out of harm's way. Previously, a Zoning Administrator could address these inadequacies in a Determination of Conditions.



March 24, 2025

Los Angeles City Council
200 N Spring Street
Los Angeles, CA 90012

Dear Planning and Land Use Management Committee Members,

The STAND-LA Coalition (Stand Together Against Neighborhood Drilling - Los Angeles) is writing to urge you to pass the motion regarding acid maintenance, [CF 24-1580](#), at the Planning and Land Use Management hearing on March 25th, 2025. Our organizations represent frontline communities in South Los Angeles and Wilmington that have been fighting for over a decade to halt the toxic extraction of oil in our neighborhoods and whose communities have been disproportionately impacted by the recent uptick in acid maintenance at drill sites.

Under the [phaseout ordinance](#) passed in December 2022, no oil wells were allowed to 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”. Acid maintenance was defined as maintenance in the Zoning Administrator’s [Interpretation on Well Maintenance](#), which was released in October 2023. This meant that acid maintenance was prohibited while the phaseout ordinance was in effect. However, when the phaseout ordinance was struck down in September 2024, the City was no longer able to enforce the regulations on acid maintenance. From October 4th, 2023 - September 1st, 2024, there were [no instances](#) of acid maintenance in the City of LA. However, from September 2nd, 2024 - March 12th, 2025, after the ordinance was struck down, there were [32 notices](#) of acid maintenance from operators to the South Coast AQMD. This dramatic increase is due to the City’s inability to enforce the ban on acid maintenance after the ordinance was struck down.

Additionally, during the devastating wildfires that recently ravaged Los Angeles, [17 different notices](#) for acid maintenance were issued by operators in LA City (from 1/7/25-1/31/25), adding even more toxins to the already highly toxic air resulting from the wildfires.

Acid maintenance (or acidizing) is a well-stimulation technique that uses thousands of gallons of strong acids, like hydrofluoric or hydrochloric acid, to dissolve rock formations and clean out wellbores. This process helps oil flow more easily, extending the life of aging wells—many of which are in densely populated areas like LA, posing severe risks to public health and the environment.

Many of the chemicals used during acid maintenance, including xylene, polyethyl benzenes, and methanol, are linked to long-term health impacts, including [endocrine disruption](#), [cancer](#), and [birth defects](#). Despite these negative health impacts, acid maintenance at drill sites continues with little oversight, disproportionately impacting frontline communities—many of whom already suffer from higher rates of respiratory illnesses, cancers, and other chronic conditions due to oil extraction operations. The release of hazardous pollutants from acidizing treatments contributes to worsening air quality, endangering residents who live, work, and go to school near these sites.

Allowing this practice to continue runs counter to Los Angeles' commitment to environmental justice and public health protection. Given the recent setback in the fight to phase out oil drilling, we must take every available measure to prevent further harm to our communities. We urge the committee to pass the acid maintenance motion. The health and safety of our residents should not be compromised for the benefit of fossil fuel companies. We need bold leadership to protect frontline communities from preventable harm.

Sincerely,

Emma Silber, Co-Coordinator, STAND-LA Coalition

Maro Kakoussian, Director of Climate and Health Programs
Physicians for Social Responsibility Los Angeles, Co-Chair of STAND-LA

Tianna Shaw-Wakeman, Environmental Justice Program Manager
Black Women for Wellness

Wendy Miranda, Policy Associate
Esperanza Community Housing

Richard Parks, President
Redeemer Community Partnership

Reverend Louis Chase, Minister of Community Outreach
Holman United Methodist Church

Roberto Cabrales, SoCal Program Co-Director
Communities for a Better Environment, Co-Chair of STAND-LA

Agustin Cabrera, Policy Director
Strategic Concepts in Organizing and Policy Education (SCOPE)

E&B and Warren E&P Notice to Residents:

AVISO DE ACTIVIDADES DE MANTENIMIENTO

En cumplimiento y según lo exigido por la Norma 1148.2 (d)(10) del Distrito de Gestión de la Calidad del Aire de la Costa Sur ("SCAQMD"), Requisitos de Notificación e Informes para Pozos de Petróleo y Gas y Proveedores de Sustancias Químicas, por la presente se le notifica que se llevará a cabo un mantenimiento rutinario de pozos



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To learn more about these
operations scan here:



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625 E Anaheim

CA 90744

11/25/2024

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Si tiene alguna pregunta o inquietud, comuníquese con Warren E & P Inc. al:

(877)587-9494

Communication from Public

Name:

Date Submitted: 03/25/2025 01:45 PM

Council File No: 24-1580

Comments for Public Posting: See attached

March 25, 2025

Client-Matter: 70193-060

VIA EMAIL

Councilmember Bob Blumenfield, Chair
Councilmember Heather Hutt
Councilmember Adrin Nazarian
Councilmember John Lee
Councilmember Nithya Raman

Re: Motion Related to Oil Well Acid Maintenance, Council File No. 24-1580

Dear Chair Blumenfield and Councilmembers:

These comments are submitted on behalf of the Native Oil Producers and Employees of California (“NOPEC”) regarding the City of Los Angeles’ (“City’s”) proposed motion to prepare an interim control ordinance that would halt the practice of oil well acid maintenance; and related matters, Council File No. 24-1580 (the “Motion”). In particular, these comments are intended to address the City’s clear intent to shut down oil and gas operations within the City. We ask that these comments be made part of the record of proceedings regarding the Motion.

In short, the Motion constitutes (1) a taking of private property without just compensation, which could subject the City to millions of dollars in damages; (2) a violation of oil and gas producers’ vested rights; and (3) a violation of due process rights. More importantly, as evidenced by recent litigation, the Motion is preempted by state law and will be struck down by the courts in short order, leading to unnecessary litigation costs and damages for the City at a time when the City can ill-afford such frivolous spending.

1. The Motion Would Constitute an Unconstitutional Taking of Private Property

The Motion represents an unconstitutional and unlawful taking of private property without just compensation, in contravention of the United States and California Constitutions. The state and federal Constitutions prohibit government from taking private property for public use without just compensation. Cal. Const., art. I, § 19; U.S. Const., 5th Amend.; *Chicago, Burlington &c. R’d v. Chicago* (1897) 166 U.S. 226, 239 (applying the federal takings clause to the states). In *Penna. Coal Co. v. Mahon* (1922) 260 U.S. 393, 415 (*Penna. Coal*), the United States Supreme Court recognized that a regulation of property that “goes too far” may effect a taking of that property. When a regulation does not result in a physical invasion and does not deprive the property owner of all economic use of the property, a reviewing court must evaluate the regulation in light of the “factors” the high court discussed in *Penn Central Transp. Co. v. New York City* and subsequent cases. *Penn Central* emphasized three factors in particular: (1) “[t]he economic impact of the regulation on the claimant”; (2) “the extent to which the regulation

has interfered with distinct investment-backed expectations”; and (3) “the character of the governmental action.” *Penn Central Transp. Co. v. New York City* (1978) 438 U.S. 104, 124. Subsequent cases, as well as a close reading of *Penn Central*, indicate other relevant factors such as whether the regulation affects the existing or traditional use of the property and thus interferes with the property owner’s “primary expectation” (*id.* at 125, 136), and whether the regulation “permit[s] the property owner] . . . to profit [and] . . . to obtain a ‘reasonable return’ on . . . investment.” *Id.* at 136. Under these factors, regulations which significantly limit the uses of private property constitute a taking. Such changes require just compensation, as well as due process and public consultation.

In addition, the United States Supreme Court has definitively established that a land use regulation “goes too far”—amounting to a facial taking of property—where it “denies an owner economically viable use of his land.” *Lucas v. SC Coastal Council* (1992) 505 U.S. 1003, 1016, citing *Agins v. City of Tiburon* (1980) 447 U.S. 255, 260. This occurs where a regulation, by implementation alone, leaves the property owner without “substantial economic use” of the affected property. See *Maritrans Inc. v. U.S.* (2003) 342 F.3d 1344, 1351-52. A facial taking analysis does not require a fact-based probe as set forth in *Penn Central*. Rather, the dispositive inquiry is “whether the mere enactment of the [regulation] constitutes a taking.” *Agins*, 447 U.S. at 295, *abrogated on other grounds*; see also *Tahoe-Sierra Pres. Council, Inc. v. Tahoe Reg’l Planning Agency* (2002) 535 U.S. 302, 318.

The Motion would give rise to a claim for just compensation by oil and gas operators within the City, as well as royalty owners and potentially other parties or entities. The Motion will severely restricts operators’ ability to use their property within the City and would materially infringe on its property rights and interests, up to and including completely eliminating the value of those rights. Acid wash maintenance is a long standing and safe process that is essential to the ongoing operation of oil and gas extraction, an activity which is protected by the California Constitution. Therefore, the Motion constitutes a taking and operators will be entitled to just compensation.

Oil and gas operations within the City generate millions of dollars in revenue annually, including hundreds of thousands of dollars in payments to royalty owners (the lion’s share of whom are City residents) and tax revenues to the City. While the ultimate value of all oil and gas operators’ property taken by the Motion requires more specific calculation, all of this significant amount would become due and owing upon the inevitable court finding of a taking in this case.

2. The Motion Violates Operators’ Fundamental Vested Rights

The Motion also constitutes a violation of operators’ vested rights. Under *Avco Community Developers, Inc. v. South Coast Regional Commission*, (1976) 17 Cal.3d 785 (“*Avco*”), where a permit holders make an investment in that permit, they possess vested legal rights. Subsequent case law has clearly concluded that the doctrine of vested rights applies to use permits and the activities authorized thereunder. See *Hansen Brothers Enterprises v. Board of Supervisors*,

(1996) 12 Cal.4th 533 (“Hansen”). Post-*Avco* decisions have held that use permits confer vested rights. *HPT IHG-2 Properties Tr. v. City of Anaheim* (2015) 243 Cal. App. 4th 188, 199 (where a CUP has been issued and the landowner has relied on it to its detriment, the landowner has a vested right.); *see also Malibu Mountains Recreation, Inc. v. County of Los Angeles* (1998) 67 Cal.App.4th 359, 367. The scope of the vested rights is the scope of activity authorized under the permit. *Santa Monica Pines, Ltd. v. Rent Control Bd.* (1984) 35Cal.3d 858, 865.

A legislative act that would have the effect of shutting down an existing oil and gas operation affects a fundamental vested right. *See, e.g., The Termo Co. v. Luther* (2008) 169 Cal. App. 4th 394, 407-408. The *Termo* case involved an administrative order of the State Oil and Gas Supervisor directing the plugging and abandonment of 28 oil wells comprising a unit. The original unit operator and a related company challenged the order seeking a writ of administrative mandamus. Relying on *Goat Hill Tavern v. City of Costa Mesa* (1992) 6 Cal. App. 4th 1519, 1529, the court held that the right to continue operating an established business in which [the owner] has made a substantial investment is a fundamental vested right. Critical to the court’s reasoning was the fact the administrative order would have the effect not only of shutting down a business that had been in existence for 20 years or more, but also of terminating the right to produce oil - an extraordinarily valuable resource with potentially massive impact in both economic and human terms. *The Termo Co. v. Luther*, *supra*, at p. 407-408.

Here, the Motion unlawfully curtails operators’ fundamental vested rights to continue and maintain their oil and gas operations. Operators within the City have made substantial investments in their wells and facilities, and made those investments in reliance on the City’s ongoing permitting, licensing, and collecting of franchise fees for oil and gas operations. Thus, these operators have vested rights in the continued use of their wells and facilities, rights for which they must be compensated if the City proceeds with the Motion and restricts operators’ abilities to appropriately maintain their wells.

3. The Motion Violates Operators’ Due Process Rights

It is a violation of oil and gas operators’ due process rights for the City to commit, in writing, to continue the rights and obligations of various approvals for oil and gas wells and facilities – including but not limited to pipeline franchises, which the City grants, collect payment from operators for those rights, and then to infringe on the right to maintain those facilities without any process for challenge or appeal. Importantly, these approvals include conditions of operation, which the Motion would upend by prohibiting acid washing, a standard maintenance technique contemplated and allowed by operators’ current permits. The City’s bait-and-switch here is unlawful and inappropriate. The City’s actions are undoubtedly arbitrary and capricious and without evidentiary support.

4. The Motion is Preempted by State Law

The Motion purports to be authorized by Assembly Bill (AB) 3233, which the Motion claims “explicitly reaffirmed the authority of local governments to protect communities by limiting or prohibiting oil and gas production within their jurisdictions.” Despite this claim, the Motion is preempted by state constitutional law. The decision by the California Supreme Court in *Chevron U.S.A. Inc. v. Cty. of Monterey* (2023) 15 Cal.5th 135 specifically held that local governments are preempted from interfering in the regulation of oil and gas operations, and that this preemption was based on the **constitutional** provisions providing for preemption by state law over conflicting local ordinances.

While the Legislature attempted to negate this holding in adopting AB3233 and adding section 3106.1 to the Public Resources Code, the California Supreme Court is the final arbiter on these state constitutional issues unless a constitutional amendment is adopted. No legislative enactment short of a constitutional amendment can change this fact.

This preemption was recently affirmed in LA County Superior Court, where the City’s prior ordinance regarding oil and gas well maintenance was struck down as preempted. *NOPEC v. City of Los Angeles, et al.*, Case No. 23STCP00085. Should the City proceed with the Motion, it will certainly be similarly struck down as preempted, at a significant cost.

5. The Motion Will Have Significant Negative Impacts on the City and its Residents

In addition to the legal impacts noted above, enacting the Motion will impact the City’s budget. If the City Council adopts the Motion, the City will immediately owe operators within the City millions of dollars, in order to compensate them for such a taking of private property. At a time when the City is experiencing a significant budget deficit, adding an additional debt of this magnitude would be an inappropriate and irresponsible use of taxpayer money.

Further, oil and gas facilities within the City pay royalties to several thousand royalty owners, many of whom are residents of the City. These Angelenos stand to lose thousands of dollars in income annually if the City illegally restricts acid wash maintenance; lost income that the City would be obligated to compensate. And finally, oil and gas operations within the City employ dozens or hundreds of City residents, who stand to lose their jobs if the Motion is passed.

* * *



Councilmember Bob Blumenfield, Chair
March 25, 2025
Page 5

We appreciate your time and attention to this matter, and strongly urge the City to reverse course and abandon its unlawful and baseless efforts to restrict lawful, permitted use of oil and gas facilities within the City.

Sincerely,

A handwritten signature in blue ink, appearing to read "Sigrid Waggener".

Sigrid R. Waggener

CC: Councilmember Katy Yaroslavsky
Councilmember Tim McOsker
Councilmember Hugo Soto-Martinez
City Attorney Hydee Feldstein-Soto

Communication from Public

Name: Richard Parks

Date Submitted: 03/25/2025 01:10 PM

Council File No: 24-1580

Comments for Public Posting: Dear Councilmembers: I write to urge your support for CF 24-1580 to protect the health and safety of Angelinos harmed by neighborhood oil extraction. Acid maintenance brings tens of thousands of gallons of highly toxic chemicals into our communities next door to homes, schools, and even hospitals. CalGEM disclosures reveal that these fluids contain air toxins, carcinogens, and endocrine disrupters—powerful chemicals that disrupt fertility and reproductive health. Acid maintenance workers are clothed in head-to-toe protective gear. They wear full face shields, chemical gloves, and chemical sensors clipped to their hard hats. They work behind red DANGER tape. Signs inside the drill site, not visible to the public, read, “STOP! DANGER. HIGH PRESSURE CHEMICALS IN USE”. However, the oil industry sends innocuous sounding notices to residents that downplay the risks. The disclosures do not provide a list of the chemicals to be used, the quantity of chemicals ordered, or the health concerns associated with each—information that would help residents assess the magnitude of risk. They also do not provide same-day certainty as to when the work will take place so residents can move their families out of harm’s way. Typically, residents observe two to four tanker trucks at a drill site for acid maintenance work, each with a carrying capacity of 5,000-gallons of acid. Ambient fumes from acid work has been observed to kill and burn plants outside the drill site. The oil phase-out ordinance put an end to this work. Now, oil operators are flooding the zoon scrambling to acidize wells before a new ordinance is adopted. We urgently need an interim control ordinance to protect public health. Please support CF 24-1580. The attached file contains photos from local drill sites to convey the industrial scale of this work and its close proximity to residents.



March 25, 2025

Planning Land Use Management Committee
Los Angeles City Council
200 N. Spring St.
Los Angeles, CA 90012

Dear Councilmembers,

We write to urge your support for CF 24-1580 to protect the health and safety of Angelinos harmed by neighborhood oil extraction.

Industrial Scale Acid Maintenance

Acid maintenance brings tens of thousands of gallons of highly toxic chemicals into our communities next door to homes, schools, and even hospitals. CalGEM disclosures reveal that these fluids contain air toxins, carcinogens, and endocrine disruptors—powerful chemicals that disrupt fertility and reproductive health.



Figure 1: Three 5,000-gallon acid tanker trucks on the Murphy Drill Site across. Independent Square retirement community visible across the street.



Figure 2 A boy biking home from school waits as an acid tanker truck exits the Murphy Drill Site. E&B Natural Resources conducted acid work while 1,300 students attended school less than 1000-feet from the drill site.

Residents Unprotected

Acid maintenance workers are clothed in head-to-toe protective gear. They wear full face shields, chemical gloves, and chemical sensors clipped to their hard hats. They work behind red DANGER tape. Signs inside the drill site, not visible to the public, read, "STOP! DANGER. HIGH PRESSURE CHEMICALS IN USE".



Figure 3: A warning sign placed inside the Murphy Drill Site during acid maintenance. The signs were not visible to the public except for when the gates briefly opened.



Figure 4: Red DANGER tap surrounds acid tankers on the Murphy Drill Site.



3264: Corrosive Liquid
1789: Hydrochloric Acid

Figure 5: A worker in head-to-toe protective gear stands behind red DANGER tape next to an acid tanker. The nearest homes are just 15-feet away.



Figure 6: A worker in protective gear stands outside the Murphy Drill Site as an acid tanker exits and a student from one of three schools less than 1000-feet away walks by.

However, the oil industry sends innocuous sounding notices to residents that downplay the risks. The disclosures do not provide a list of the chemicals to be used, the quantity of chemicals ordered, or the health concerns associated with each—information that would help residents assess the magnitude of risk. They also do not provide same-day certainty as to when the work will take place so residents can move their families out of harm's way.

NOTICE OF MAINTENANCE ACTIVITIES

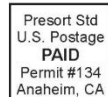
In compliance with and as required by South Coast Air Quality Management District ("SCAQMD") Rule 1148.2 (d)(10), Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers, you are hereby notified that routine well maintenance will be conducted.

WHY AM I RECEIVING THIS NOTICE?

You are receiving this notice because you live within proximity to our maintenance activities. To ensure we are producing the world's only climate compliant oil and following all state, federal and local regulations, regular maintenance is conducted to ensure our facilities continue to operate safely, efficiently, and in accordance with state regulations. As your community energy producer, we are committed to upholding the highest health and safety standards, and further reducing our reliance on foreign oil.

Owner and Operator of Wells:	E&B Natural Resources 18471 Mt. Langley Street, Suite P, Fountain Valley, CA 92708 714-968-4770		
Well Name(s) and API Well Numbers:	P-18;037-20292 P-27;037-20463	P-34;037-20547 P-50B;037-20777	P-6;037-20104 P-63;037-21009
Geographic Well Coordinates:	34.05110435/-118.3626886		
Projected Start Date(s) and Time(s):	ON OR AFTER 1/6/2025 6:00am	ON OR AFTER 1/6/2025 6:00am	ON OR AFTER 1/6/2025 6:00am
Anticipated Chemicals to be Used:	Low-pH hydrochloric solvent, low-pH hydrofluoric solvent		

Have questions about our operations? Give us a call at 714-968-4770



To learn more about these
operations scan here:



https://www.cipa.org/files/public/SCAQMD_FAQ_2023_v4.pdf

Figure 7: The standard notice used by E&B Natural Resources.

Typically, residents observe two to four tanker trucks at a drill site for acid maintenance work, each with a carrying capacity of 5,000-gallons of acid. Ambient fumes from acid work has been observed to kill and burn plants outside the drill site.



Figure 8: The scarring of the palm trunk and killing of multiple species of plants occurred outside the Jefferson Drill Site in 2014 immediately following acid maintenance. The LA County plant pathologist attributed the impact to acid maintenance.

The oil phase-out ordinance put an end to this work. Now, oil operators are flooding the zone scrambling to acidize wells before a new ordinance is adopted. We urgently need an interim control ordinance to protect public health. Please support CF 24-1580.

Sincerely,

Richard Parks
President
Redeemer Community Partnership

Rev. Louis Chase
Minister of Community Outreach
Hollman United Methodist Church