

Comparison of Proposed Culver City Draft Oil Drilling Regulations that are More Stringent than Approved County Community Standards District and Settlement Agreement ¹

	Proposed Culver City Regulations	County Community Standards District (CSD)	Settlement Agreement
<i>Oil Operations</i>	Specific Plan Comprehensive Drilling Plan Annual Drilling Plan Drilling Use Permit Monitoring and Reporting (Section 4)	Oil Field Drilling Application CSD Annual Drilling Plan Monitoring and Reporting	Not addressed
<i>Maximum Number of Wells</i>	30 wells through 2028 (3.3 acres per well) (Section 4) 2 to 3 wells per year (Section 31.B.1)	600 wells over 20 years (1.5 acres per well) 45 wells per year	500 new wells through 2028 (1.8 acres per well) 30 to 35 wells per year
<i>Bonus Wells</i>	No bonus for well abandonment	No bonus for well abandonment	For each well abandoned within 800 feet of Developed Area, allows drilling of 2 new additional wells outside of the 800-foot zone
<i>Drilling Plan Supplements to Annual Drilling Plan</i>	Supplement required for all Deep-Zone or Mid-Zone wells where Top Hole is within 800 feet of Sensitive Developed Area (broad definition of Mid-Zone based on depth, not specific geological zones) (Section 31.C)	Not addressed	Supplement required for Deep-Zone or Mid-Zone where Top Hole is closer than 800 feet of Sensitive Developed Area. (definition of Mid-Zone specifically limited to certain geographical zones)
<i>Major Facilities</i>	No Major Facilities allowed (Section 14)	Connect to existing gas plant	Not addressed
<i>New Technology</i>	Promptly implement new technologies that reduce environmental impacts (Section 11.B)	Use proven technological improvements if reduce environmental impacts	Identify availability and feasibility of new technology in Annual Plan
<i>Threshold to investigate release of Hydrogen Sulfide (H₂S)</i>	1 part per million (Section 21.C)	5 parts per million	Not addressed
<i>Air Grab Samples</i>	City may take air grab samples in response to gas release or complaints of odors. Operator responsible for costs (Section 21.C)	Not addressed	Not Addressed

¹ This is not an exhaustive list of Culver City oil drilling regulations that are more stringent than the County CSD. In addition, this is not a complete summary of all of the proposed Culver City regulations.

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<i>Fire Training and Equipment</i>	Operator required to pay for costs and expenses (Section 12.C)	Not addressed	Not addressed
<i>Noise shall not exceed baseline levels</i>	By more than 5 dBA during daytime hours (not limited to locations near developed areas) (Section 22.A)	By more than 5 dBA at any developed area	By more than 5 dBA at any developed area
<i>Limit night-time noise</i>	No more than 3 dBA above a one-hour baseline average at sensitive receptor (10 pm to 7 am) (Section 22.A)	Minimum nighttime equivalent level (7 pm to 7am)	No more than 3 dBA above one-hour baseline average at developed area (10 pm to 7 am)
<i>Site-Specific Geotechnical Investigation</i>	Required for grading in excess of 1,000 cubic yards and for permanent structures (Section 24.B)	Required for grading in excess of 5,000 cubic yards and permanent structures	Not addressed
<i>Directional Surveys on Certain Wells</i>	Survey required for wells where Top Hole or Bottom Hole is within 400 feet of an exterior boundary line of City-owned property (Section 42)	Not addressed	Requires a study of the technical feasibility and commercial reasonability of slant drilling
<i>Hydraulic Fracturing</i>	Prohibited until DOGGR or Legislature adopts regulations that adequately protect public health, safety and environment (Section 32)	Not addressed	Study feasibility and potential impacts (groundwater and subsidence impacts) of fracturing operations
<i>Drilling or Redrilling Rigs</i>	No more than one (1) drilling rig at any one time and no more than two (2) reworking, maintenance and/or abandonment rigs in place at any one time (Sections 31.B and 33.A)	No more than three (3) drilling rigs at any one time and no more than eight (8) reworking rigs at one time	No more than two (2) drilling rigs at any one time
<i>Landscaping</i>	Need approved landscaping plan to visually screen oil operations and improve appearance of oil field and ensure compatibility of oil field with surrounding area. Annual review required. (Section 37)	Landscaping completed in phases over a two-to five-year period per approved landscape plan	Complete installation of first two phases within nine months of approval Complete final phase of Plans within three years