



CITY OF CULVER CITY
INGLEWOOD OIL FIELD
SPECIFIC PLAN
SEPTEMBER 15, 2017

PUBLIC REVIEW DRAFT

Lead Agency:
City of Culver City
9770 Culver Boulevard
Culver City, CA 90232

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CHAPTER 1.0 INTRODUCTION

1.1 ROLE AND FUNCTION OF SPECIFIC PLANS

A specific plan is a tool for the systematic implementation of the general plan for a designated area. It should effectively establish a link between implementing policies of the general plan and the individual development proposal(s) within a defined plan area. Specific plans function as versatile tools for implementing general plans and defining a particular development or land use. They systematically implement the general plan for all or part of the area under its scope in any of three ways: (1) by acting as statements of planning policy that refine the general plan policies applicable to a defined area; (2) by directly regulating land use; or (3) by bringing together detailed policies and regulations into a focused development scheme. Once a specific plan is adopted, all development projects and development agreements for that specific area must be consistent with the plan.

A specific plan may be as general as setting forth broad policy concepts, or as detailed as providing direction to every facet of development or utilization of the land from the type, location and intensity of uses to the design and capacity of infrastructure; from the resources used to finance public improvements to the design guidelines of a development project.

1.2 AUTHORITY FOR SPECIFIC PLANS

Authority for the specific plan is established by California Government Code, Title 8, Division 1, Chapter 3, Article 8, Sections 65450 through 65457, which grants authority to cities to adopt specific plans for the purposes of implementing the goals and policies of their general plans. A specific plan must be consistent with the adopted general plan of the jurisdiction within which it is located. In turn, all subsequent subdivision, development, public works projects and zoning regulations for the defined area must be consistent with the adopted specific plan.

As with a general plan, the authority for adoption of the specific plan is vested with the local legislative body pursuant to Government Code Section 65453(a). Unlike the general plan, which is required to be adopted by resolution (Section 65356), two options are available for the adoption of a specific plan: (1) adoption by resolution, which is designed to be policy driven; or (2) adoption by ordinance, which is regulatory by design. Government Code Section 65453(a) states that a specific plan may be amended as often as necessary. Amendments to a specific plan are accomplished in the same manner as its adoption.

1.3 REQUIRED SPECIFIC PLAN CONTENT

The range of issues contained in a specific plan is generally left to the discretion of the decision-making body; however, all specific plans, must comply with Sections 65450 - 65457 of the Government Code. Further, the California Office of Planning and Research provides guidelines for the preparation of specific plans.

Section 65451 of the Government Code mandates that a specific plan be structured as follows:

(a) A specific plan shall include a text and a diagram or diagrams which specify all of the following in detail:

(1) The distribution, location, and extent of the uses of land, including open space, within the area covered by the plan.

(2) The proposed distribution, location, and extent and intensity of major components of public and private transportation, sewage, water, drainage, solid waste disposal, energy, and other essential facilities proposed to be located within the area covered by the plan and needed to support the land uses described in the plan.

(3) Standards and criteria by which development will proceed, and standards for the conservation, development, and utilization of natural resources, where applicable.

(4) A program of implementation measures including regulations, programs, public works projects, and financing measures necessary to carry out paragraphs (1), (2), and (3).

(b) The specific plan shall include a statement of the relationship of the specific plan to the general plan.

1.4 REGULATORY PURPOSE OF THIS SPECIFIC PLAN

The regulatory purpose of the Culver City Inglewood Oil Field Specific Plan (City IOF Specific Plan or Specific Plan) is to govern development and operations of oil and gas exploration and production activities on an approximately 77.8-acre portion of the approximate 1,000-acre Inglewood Oil Field (IOF) that straddles the City of Culver City and the Baldwin Hills area of unincorporated Los Angeles County. This City IOF Specific Plan establishes development standards that are tailored to the oil and gas drilling and production uses, and unique to the community concerns of Culver City and consistent with the City's long-range planning objectives for the Blair Hills neighborhood and neighborhoods along the Jefferson Boulevard corridor.

The City IOF Specific Plan has been prepared pursuant to the provisions of the California Government Code, Sections 65450 through 65457. This Specific Plan also follows the California Office of Planning and Research Guidelines.

In addition, the City IOF Specific Plan is consistent with the City of Culver City General Plan (General Plan). The Specific Plan reflects extensive technical analysis, input from the Oil Field Operator, input from the land owners and surrounding parks and open space operators, input from the community, and applicable goals, objectives and policies of the General Plan, culminating in a functional program for interim oil-related uses and activities within a broader open space setting and mixed community-uses context.

Included in the Specific Plan document are land use objectives, infrastructure guidelines, development standards and regulations, environmental protection features, and implementation measures to ensure that the continued oil and gas operations within the City IOF will be implemented in accordance with the goals and objectives established for the Specific Plan area, and consistent with the General Plan.

This Specific Plan, when adopted by ordinance, becomes the Plan that serves as the interim planning document for the City IOF and establishes the use-specific regulations for oil drilling and related oil and gas production activities at the property. All other City codes and ordinances shall continue to be applicable, unless expressly superseded by the terms of this Specific Plan or unless they are inconsistent with this Specific Plan, in which case they are superseded.

Any proposed site plans, agreements or any other development approvals, including any and all

future drilling plans and drilling use permits, must be consistent with this Specific Plan. Projects and/or oil-related developments which are found consistent with this Specific Plan will be deemed consistent with the City's General Plan and its adopted elements.

As oil and gas production is a specialized land use, this Specific Plan is appropriate and useful to further address the special needs and conditions of the area surrounding the IOF. The Specific Plan updates and supersedes the City's existing oil drilling regulations and is intended to address the changes in the last decade in oil production-related technology, legislation, public concerns and environmental considerations. Further, this Specific Plan facilitates preservation of key natural features and enhances the management of oil uses to better protect the public health, safety and welfare, and the environment.

The primary entitlement action includes adoption of the City IOF Specific Plan by ordinance. Secondary entitlement actions include modifications to the City's existing regulations affecting oil drilling and oil-operations activity to ensure consistency between the proposed new requirements and existing standards. The Specific Plan includes a set of oil drilling standards and regulations (Drilling Regulations) designed to protect the public health, safety and welfare and the environment and citizens of the City of Culver City and surrounding communities. An Environmental Impact Report (EIR) prepared on the Specific Plan Project addresses the potential environmental impacts associated with developing all of the allowable activities and components that could be implemented within the City IOF under the Specific Plan.

The City IOF Specific Plan provides the regulatory framework for the update and enhancement of previously established oil drilling and production operations within Culver City. It allows for the continuation of these uses, including the potential for the drilling of new wells, for an interim period as nonconforming uses located within the City IOF. The Specific Plan establishes procedures to require that these oil-related activities be comprehensively planned and administered, rather than addressed in a piece-meal manner focused only on individual well sites. Further oil drilling and production development within the City IOF will be guided by a comprehensive 15-year plan (set forth by this Specific Plan and to be supplemented at a later date by the Oil Operator's Comprehensive Drilling Plan). The Specific Plan Development Plan (found in Chapter 3.0 of this Specific Plan) contemplates current safeguards and controls for activities related to drilling for and production of oil, gas, and other hydrocarbon substances within the City IOF. The Specific Plan contains administrative items, and requirements for permits, plans, wells, supporting facilities, equipment, and operations to assure the implementation of plans and protocols and the ongoing review and monitoring of compliance with these plans and protocols.

This Specific Plan is intended to streamline and improve overall management and administration of the City IOF, while ensuring oil-related uses are developed and operated compatibly with surrounding uses, and to provide flexibility to accommodate evolving needs of the Oil Field Operator. This Specific Plan also addresses long-term infrastructure and neighborhood compatibility issues.

1.5 OVERVIEW OF THE INGLEWOOD OIL FIELD ACTIVITIES AND LAND USES

The Specific Plan is intended to allow for development of that portion of the IOF located within the City of Culver City (i.e., the City IOF, as described in Chapter 2.0), in accordance with the Specific Plan, that could occur over a period of 15 years, assumed to range from 2018 through 2032.¹ However, once the maximum cap of 30 new wells has been met, no further drilling would

¹ It is intended that the City IOF Specific Plan allow for a 15-year timeframe during which new drilling or re-drilling, when conducted in accordance with the provisions of the Specific Plan and related

be allowed, even if the end of the Plan period has not been reached. Oil and gas production and operations associated with permitted wells established under this Specific Plan, could continue beyond the 15-year drilling period prior to and as specified in this Specific Plan and/or established through conditions of the approved Drilling Plan(s) and Drilling Use Permit(s).

The City IOF contains 69 wells having top-hole locations within the Specific Plan boundary that pre-date this Specific Plan. As of 2015, the California Division of Oil, Gas and Geothermal Resources (DOGGR) indicated that 36 wells are active and five wells are idle. The other 28 wells are plugged or abandoned. DOGGR also identifies one well that has been permitted by DOGGR, but never drilled. And because this one well² has not been permitted by the City of Culver City and does not physically exist, it does not constitute an existing well.

Under the Specific Plan, the total number of newly drilled or redrilled wells would be limited to two per year during the first two years and three per year thereafter (as approved by the Community Development Director), up to a maximum of 30 new or redrilled wells. At the end of the 15-year drilling period under the Specific Plan, no additional wells could be drilled or redrilled. However, reworking of existing wells and other related operational and maintenance activities would be allowed to continue in accordance with the provisions of the Specific Plan prior to abandonment.

A summary of existing and proposed wells as described in this Specific Plan is provided in Table 1-1, Summary of City IOF Specific Plan Well Development. In addition to oil wells, ancillary oil production and operational equipment and facilities are established throughout the City IOF, and similar new facilities are anticipated as new wells are implemented. Provisions of this Specific Plan prohibit some types of facilities (i.e., sumps, wastewater detention ponds, and processing facilities) or restrict the potential size and/or location of some types of facilities (i.e., storage tanks). More detail about the allowed or prohibited uses is provided in Chapters 3.0 and 4.0 of this Specific Plan.

Table 1-1: Summary of City IOF Specific Plan Well Development

Well Status Category ⁱ	Maximum Number of All Wells	Maximum Number of Active/Potentially Active Wells
Existing Abandoned Wells	28	na
Existing Active or Potentially Active Wells	41	41
Potential Future New Wells (allowed under the City IOF Specific Plan)	30	30
TOTAL	99	71

ⁱ Status of existing wells reflects data maintained by the California Division of Oil, Gas and Geothermal Resources (DOGGR) as of July 2015.

Drilling Regulations, could occur. While this Specific Plan text references an assumed plan range between 2018 and 2032, the actual 15-year timeframe and future expiration date for drilling activities will be established from the effective date of the Ordinance adopting this Specific Plan, and inclusive of adjustments (if any) approved by the City Council of Culver City.

² Well NW Extension 920 (API#03726595) is listed as a “pending” well by DOGGR; however, it was not constructed and has not been entitled by any permit from the City of Culver City. Therefore, this well does not count as either an active or potentially active (i.e., idle) well prior to adoption this Specific Plan.

1.6 CONTENTS OF THIS SPECIFIC PLAN

The City IOF Specific Plan is organized as follows:

Chapter 1.0 – Introduction: This chapter provides an explanation of the role and function of specific plans, the purpose of the City IOF Specific Plan, and a summary overview of the subject City IOF uses, activities and development.

Chapter 2.0 – Planning Context: This chapter describes the location, setting, context and planning issues associated with the City IOF and the objectives of the Specific Plan.

Chapter 3.0 – Development Plan: This chapter includes the conceptual and component-specific plans for City IOF development. In addition to the concept overview, this chapter provides component plans for the land use concept; open space and conservation plan; infrastructure, utilities and services plan; safety and hazards management plan; landforms, visual resources and viewshed management plan; and environmental management and sustainability plan.

Chapter 4.0 – Development Standards and Guidelines: This chapter sets forth allowed land uses, site planning standards, permitting requirements, landscaping, monitoring and reporting provisions for oil-related uses and development within the City IOF.

Chapter 5.0 – Implementation and Administration: This chapter provides a review of the Specific Plan's relationship to the City's General Plan, Culver City Municipal Code (including the Zoning Code), and other regulatory codes. In addition, this chapter discusses the implementation, administration and amendment process for the Specific Plan.

CHAPTER 2.0 PLANNING CONTEXT

2.1 LOCATION AND PLAN BOUNDARY

2.1.1 Project Location

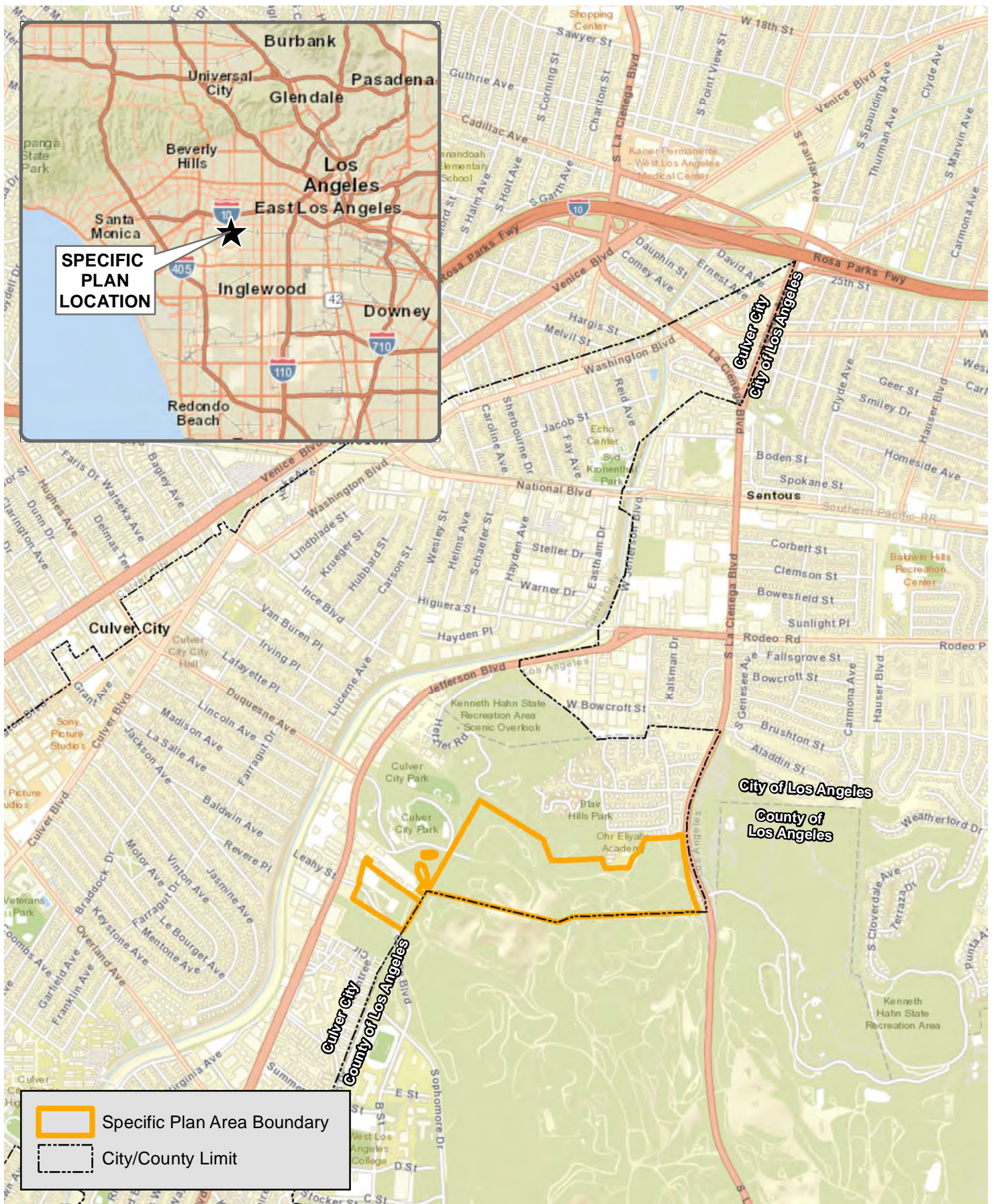
The Specific Plan area (City IOF) is located at the northern end of the Inglewood Oil Field (IOF), in the eastern section of Culver City and adjacent to the Blair Hills neighborhood and neighborhoods along the Jefferson Boulevard corridor. These neighborhoods are bound by the City of Los Angeles to the north and east and the unincorporated area of Los Angeles County, also to the east, and south.

Regional access to the Specific Plan area is provided by Interstate 10 (I-10), approximately 1.5 miles to the north and Interstate 405 (I-405), approximately 2.0 miles to the south. I-10 has an exit on Fairfax Avenue, which turns into La Cienega Boulevard. I-405 has an exit on La Cienega Boulevard, as well. From La Cienega Boulevard, direct access to the City IOF is provided by Stocker Street to South Fairfax Avenue (which is different from the I-10 exit at Fairfax Avenue). Slauson Avenue also connects to South Fairfax Avenue, where gated access points to the IOF are located. Figure 1, Regional Location Map, shows the location of the Specific Plan area within the context of the region.

The Specific Plan covers approximately 77.8 acres of the IOF that is within the City's jurisdictional limits (City IOF). The entirety of the IOF is approximately 1,000 acres, the majority of which is within the unincorporated area of Los Angeles County (i.e., the County IOF portion) and within a community known as Baldwin Hills. The Specific Plan area is generally bound by La Cienega Boulevard to the east; the City of Culver City/Los Angeles County line to the south; Culver City Park and College Boulevard to the west; and the Baldwin Hills Scenic Overlook and the Blair Hills residential area in Culver City to the north. Figure 2, Specific Plan Location and Reference Map, shows the Specific Plan area within context of surrounding properties and the immediate vicinity of the cities of Culver City and Los Angeles, and the unincorporated area of Los Angeles County.

The Specific Plan area consists of four non-contiguous areas in the City that are subject to active oil and gas production. These four areas, identified by "Area" number for reference to specific locations within the City IOF, are shown in Figure 2 and generally described as follows:

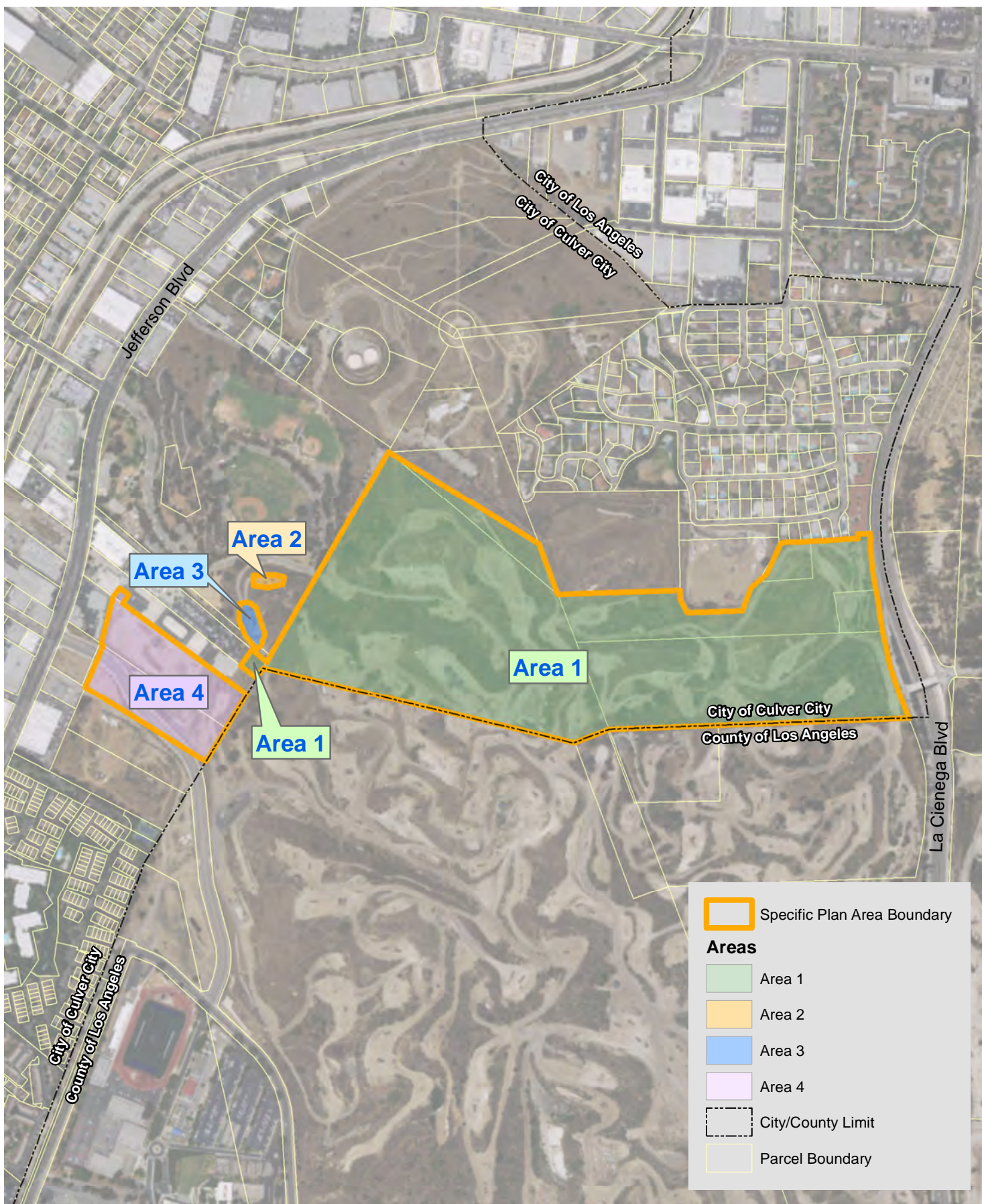
- Area 1 The largest of the City IOF areas and generally located west of La Cienega Boulevard, north of the City boundary and east of the Culver City Park, Area 1 consists of approximately 68.24 acres and, as of adoption of this Specific Plan, includes 57 total existing wells, of which 29 are active or idle (i.e., potentially active) and 28 have been plugged and abandoned.
- Area 2 One of two small "pods" that are incorporated into the southeast corner of Culver City Park, Area 2 is generally south of Duquesne Avenue and in the vicinity of the Culver City "Bone Yard" Dog Park. It is the most northerly pod and consists of approximately 0.22 acres and, as of adoption of this Specific Plan, includes two existing active or idle wells.
- Area 3 The second of two small "pods" that are incorporated into southeast corner of Culver City Park and south of Duquesne Avenue within the vicinity of the Bone Yard Dog Park, Area 3 is southerly of Area 2 and consists of approximately 0.52



Regional Location Map

FIGURE

1



Specific Plan Location and Reference Map

FIGURE
2



Inglewood Oil Field Specific Plan

Source(s): Google Earth Aerial (02-2016); City of Culver City (2016); Planning PLUS/P+ (2017).

acres, and, as of adoption of this Specific Plan, includes three existing active or idle wells.

Area 4 A detached rectangle of land that is the western extension of the City IOF, and which extends into a small commercial/industrial enclave accessed from Jefferson Boulevard and including undeveloped land along College Boulevard, Area 4 consists of approximately 8.77 acres, as of adoption of this Specific Plan. This area includes a total of seven existing wells, three of which are active/idle and four of which have been plugged and abandoned.

2.1.2 Plan Boundary

The Specific Plan area is defined as the entirety of eight parcels within the city limit of Culver City and four small polygons within three adjacent parcels that comprise the City IOF. The Specific Plan area includes the parcel areas as indicated in the following Table 2-1, City IOF Specific Plan Area Parcels:

Table 2-1: City IOF Specific Plan Area Parcels

Assessor Parcel Number (APN)	Acreage (approximate)	Specific Plan Reference Area
A. a portion of APN 4204-003-901 comprising an irregularly-shaped polygon (approximately 70' x 150'), located in the southern portion of the parcel and just south of Duquesne Avenue, and comprising the area surrounding oil wells Block 23 and Block 31	0.22	Area 2
B. a portion of APN 4204-003-901 comprising an irregularly-shaped polygon (approximately 100' x 225'), located at the southern tip of the parcel, south of Duquesne Avenue, and comprising the area surrounding oil wells Block 26, Block 29 and Block 30	0.52	Area 3
C. all of APN 4204-014-013	1.98	Area 1
D. all of APN 4204-014-015	18.28	Area 1
E. all of APN 4204-014-018	1.18	Area 1
F. all of APN 4204-014-905	1.00	Area 1
G. all of APN 4204-014-907	10.18	Area 1
H. all of APN 4204-017-006	35.50	Area 1
I. a portion of APN 4296-001-008 comprising a square polygon (approximately 60' x 60'), located approximately 215 linear feet southeast of Jefferson Boulevard and abutting the northeast corner of APN 4296-001-270, and comprising the area surrounding oil well Machado 7-A	0.09	Area 4
J. a portion of APN 4296-001-009 comprising a rectangular polygon (approximate 100' x 110') that is coincident with the east end of the parcel, and comprising the area surrounding oil well Machado 1	0.25	Area 1
K. all of APN 4296-001-270	4.62	Area 4
L. all of APN 4296-001-905	4.13	Area 4
TOTALⁱ	77.75	
ⁱ The overall total may be slightly different than the plan area total due to rounding of the values for the individual parcel areas.		

An expanded description defining the applicable area of the City IOF Specific Plan area is provided in **Appendix A** (Boundary Description).

2.1.3 Property Ownership

The Specific Plan area is owned by multiple landowners that include both public agencies (owning approximately 30 percent) and private entities (owning approximately 70 percent). The majority of the 68.24 acres of Area 1 is privately owned; however, approximately 11.18 acres is owned (and managed) by the Baldwin Hills Regional Conservation Authority (BHRCA), a public agency. Areas 2 and 3 are located entirely within the Culver City Park, which is owned by the City of Culver City. All of Area 4, except for the small rectangular extension into APN 4296-001-008, is publicly owned with property ownership split between the City of Los Angeles and the Los Angeles Community College District.

Subsurface mineral rights and/or lease rights may be under different and separate ownership or contract than the surface property ownership.

2.2 HISTORY AND BACKGROUND

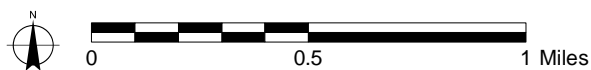
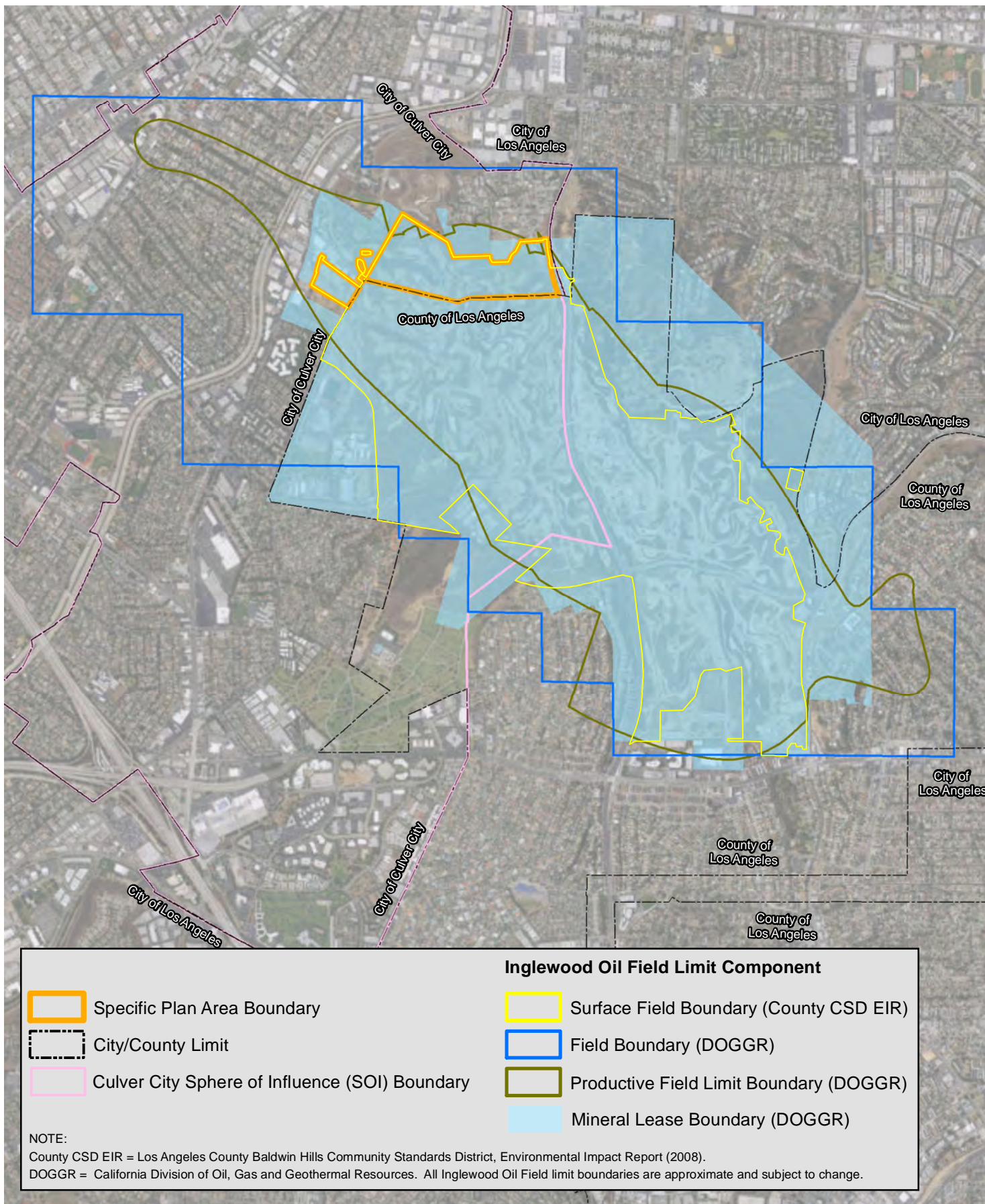
The City IOF Specific Plan area is located within a portion of the currently active IOF. The IOF covers approximately 1,000 acres within the unincorporated area of Los Angeles County and the City of Culver City. The majority of the IOF is in the County, with the City IOF comprising approximately 77.8 acres of the northwestern portion of the IOF.

The first oil-producing well was drilled in the IOF in 1924; by 1925, over 50,000 barrels of oil were produced per day. By the early 2000's, as many as 368 million barrels of oil and 269 billion cubic feet of natural gas (principally methane) were being produced by the IOF. As of July 23, 2015, the California Department of Conservation's Division of Oil, Gas and Geothermal Resources (DOGGR) reported that there are 1,588 wells overall within the IOF. Based on the DOGGR's annual report for 2014, the IOF produced nearly 2.67 million barrels of oil; 1.27 billion cubic feet of gas; and 127.46 million barrels of water.

The "productive field limit boundary" as defined by DOGGR is the sub-surface area where oil and gas production is known to have occurred or is currently occurring. The "field boundary" is the surface area which overlies one or more common underground reservoirs where DOGGR believes oil and gas resources exist. The rights to use the land surface for oil and gas drilling and associated activities are governed by applicable laws and regulations and by the agreements between the Oil Field Operator and the landowners. The underlying mineral rights are defined by the deed abstract for the individual property parcels reflecting mineral leases located within the IOF. Figure 3, Inglewood Oil Field Context Map, shows the relationship of these various field limit boundaries in context to the City of Culver City and the Specific Plan area.

In the late 1990's and early 2000's, the Plains Exploration and Production Company (PXP) obtained the drilling rights for the IOF. In 2014, Freeport McMoran Oil & Gas (FMOG) purchased PXP and became the Oil Field Operator. As of July 1, 2016, FMOG sold its onshore California oil and gas properties (including the Inglewood Oil Field) to Sentinel Peak Resources California LLC (SPR). SPR is a private energy company focused on acquisitions and development primarily in California, and is now the current Oil Field Operator for the IOF.

In October 2008, the Los Angeles County Board of Supervisors adopted the Baldwin Hills Community Standards District (CSD) establishing regulations for oil and gas production activities in the County IOF. A CSD is a supplemental district used by the County to address special issues that are unique to certain geographical areas within the unincorporated area of the County. Following the approval actions of the County Board of Supervisors, the City of Culver City and other parties joined together in a lawsuit challenging the environmental review



Inglewood Oil Field Context Map

Inglewood Oil Field Specific Plan

Source(s): Google Earth Aerial (02-2016); DOGGR (2016); City of Culver City (2016); Planning PLUS/P+ (2017).

FIGURE
3

of the CSD. In July 2011, a settlement of the litigation was reached, referred to as the Settlement Agreement, which provided for enhanced regulations to protect the public health and safety and the environment of the communities surrounding the IOF. Although the City of Culver City at one time considered developing cooperative regulations with the County, that did not occur and the regulations set forth in the CSD and in the Settlement Agreement are only applicable to the County IOF, and do not apply to the City IOF.

Culver City's current oil drilling regulations were last updated in 2003 and regulate nonconforming oil and gas drilling activities within the entire City limits. The City IOF is the only area within the City where legal nonconforming oil-related activities may continue. In April 2013, Culver City released to the public the *Discussion Draft Oil Drilling Regulations for the Culver City Portion of the Inglewood Oil Field* (Discussion Draft Regulations), for public review and comment, to update and replace the City's current oil drilling regulations. Several comment letters were received from the public and private industry. In June 2014, the City Council of the City of Culver City adopted a resolution declaring its intention to initiate preparation of a Specific Plan for the City IOF. This Specific Plan is based on the Discussion Draft Regulations, which were modified, in part, in response to comments. The City IOF Specific Plan regulates oil and gas drilling and associated activities only within the identified Specific Plan area boundaries (i.e. City IOF), as described in **Appendix A**, Boundary Description.

2.3 CURRENT CONDITIONS

2.3.1 Existing City IOF Conditions

The Specific Plan area consists of four non-contiguous, irregularly-shaped areas (Areas 1 through 4, as described above) that represent the surface area within which the top-hole locations for current active (or potentially active) wells are located within the City IOF.

The City IOF is an operating oil and gas production field. On-site activities and facilities include petroleum extraction and storage; produced water injection; and pipelines to convey oil, produced water, and natural gas to the larger processing facilities within the County IOF. Existing facilities are dispersed throughout the IOF on graded and cleared pads, with meandering dirt roads and patches of vegetation. A number of tanks, several types of wells (i.e., active, idle, production, injection), and pipelines to transport the produced oil and gas are located throughout the City IOF.

While the productive field limit boundary area and subsurface mineral lease boundary area of the IOF encompasses a larger area of Culver City (see Figure 3), the boundary of the City IOF Specific Plan has been formed to include only areas where there are known active or potentially active (i.e., idle) production or injection wells. According to DOGGR records (July 2015), there are 69 existing wells having top-hole locations within the Specific Plan boundary. Thirty-six are active (production or injection) wells and five wells are idle.¹ The other 28 wells are plugged or abandoned. In addition, DOGGR records indicate that one well has been permitted by DOGGR,

¹ The number of active and idle wells as indicated herein is representative of a "snap shot" at the time at which this document and the related EIR were prepared. The Oil Field Operator has the ability to alternate well status between active and idle in compliance with DOGGR regulations. For the purpose of characterizing the existing condition in this Specific Plan, any non-active well that has not been formally plugged or abandoned (in compliance with DOGGR), is assumed to have the potential to become active. Hence, although the number of "active" or "idle" wells may vary periodically, the total number of operational or potentially operational wells is the combined total of both.

but never drilled. Because this one well² has not been permitted by the City of Culver City, and does not physically exist, it does not constitute an existing or permitted.

In addition, more than 50 plugged and abandoned wells are located in the vicinity adjacent to (but not within) the north and west boundary of the Specific Plan area, within the City of Culver City. Figure 4, Existing City IOF Conditions, shows the existing well top-hole locations and roads and facilities established within the City IOF as developed and improved through 2015. The figure also shows other abandoned wells within the City and vicinity of the Specific Plan area, as well as representative locations of existing wells within the County IOF area to the south.

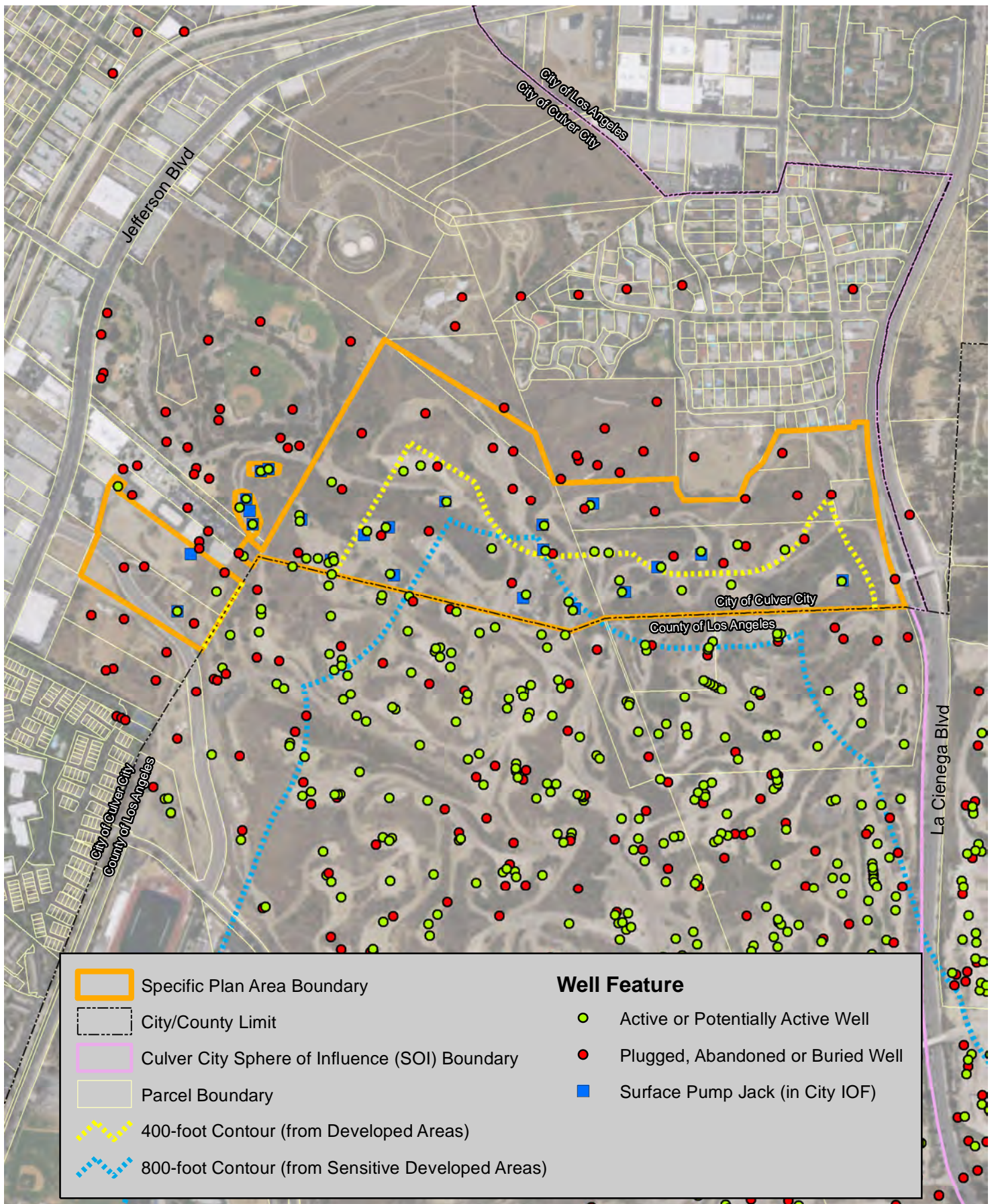
An overview and status of existing wells in the City IOF (as discussed above) is provided in Table 2-2, Existing (2015) City IOF Wells.

Table 2-2: Existing (2015) City IOF Wells

Well Identification ¹ American Petroleum Institute (API) Number / Lease Name and Well Number (well status and well type per DOGGR [2015])		Number of Wells
EXISTING ABANDONED WELLS		28
1. 3700242 / VRU 119 (inactive, plugged or abandoned) 2. 3700269 / TVIC 34 (inactive, plugged or abandoned) 3. 3707870 / Machado 2 (inactive, plugged or abandoned) 4. 3707874 / Machado 4 (inactive, plugged or abandoned) 5. 3707875 / Machado 4-A (inactive, plugged or abandoned) 6. 3707878 / Machado 6 (inactive, plugged or abandoned) 7. 3707880 / Machado 7 (inactive, plugged or abandoned) 8. 3708130 / VRU 106 (inactive, plugged or abandoned) 9. 3708132 / VRU 107 (inactive, plugged or abandoned) 10. 3708133 / Dabney Lloyd 5 (inactive, plugged or abandoned) 11. 3708134 / Dabney Lloyd 6 (inactive, plugged or abandoned) 12. 3708135 / Dabney Lloyd 6-A (inactive, plugged or abandoned) 13. 3709081 / VR 112 (inactive, plugged or abandoned) 14. 3709089 / VR 120 (inactive, plugged or abandoned) 15. 3709092 / TVIC 1 (inactive, plugged or abandoned) 16. 3709102 / TVIC 12 (inactive, plugged or abandoned) 17. 3709103 / TVIC 13 (inactive, plugged or abandoned) 18. 3709104 / TVIC 14 (inactive, plugged or abandoned) 19. 3709105 / Vickers 15 (inactive, plugged or abandoned) 20. 3709109 / TVIC 20 (inactive, plugged or abandoned) 21. 3709117 / Vickers 29 (inactive, plugged or abandoned) 22. 3709146 / Vickers 70 (inactive, plugged or abandoned) 23. 3720459 / TVIC 216 (inactive, plugged or abandoned) 24. 3720460 / TVIC 217 (inactive, plugged or abandoned) 25. 3721209 / VRU 121 (inactive, plugged or abandoned) 26. 3721516 / TVIC 218 (inactive, plugged or abandoned) 27. 3721797 / TVIC 219 (inactive, plugged or abandoned) 28. 3723217 / VRU 260 (inactive, plugged or abandoned)		
EXISTING ACTIVE OR POTENTIALLY ACTIVE WELLS		41
1. 03700248 / TVIC 59 (active, oil & gas production) 2. 03700249 / TVIC 63 (active, oil & gas production) 3. 03707468 / Block 22 (active, oil & gas production) 4. 03707469 / Block 23 (active, oil & gas production) 5. 03707472 / Block 26 (active, oil & gas production)		

² Well NW Extension 920 (API#03726595) is listed as a “pending” well by DOGGR; however, it was not constructed and has not been entitled by any permit from the City of Culver City. Therefore, this well does not constitute as either an active or potentially active (i.e., idle) well prior to adoption of this Specific Plan.

Well Identification ⁱ American Petroleum Institute (API) Number / Lease Name and Well Number (well status and well type per DOGGR [2015])		Number of Wells
6. 03707475 / Block 29 (active, oil & gas production) 7. 03707476 / Block 30 (idle, oil & gas production) 8. 03707477 / Block 31 (active, oil & gas production) 9. 03707867 / Machado 1 (active, oil & gas production) 10. 03707873 / Machado 3-A (active, oil & gas production) 11. 03707876 / Machado 5 (active, water injection) 12. 03707881 / Machado 7-A (active, oil & gas production) 13. 03708129 / VRU 105 (active, oil & gas production) 14. 03709080 / VRU 110 (active, oil & gas production) 15. 03709082 / VRU 113-A (active, oil & gas production) 16. 03709083 / VRU 114A (active, water injection) 17. 03709084 / VRU 115 (active, oil & gas production) 18. 03709086 / VRU 116 (active, oil & gas production) 19. 03709087 / VRU 117 (active, water injection) 20. 03709088 / VRU 118 (active, water injection) 21. 03709090 / VRU 111 (idle, oil & gas production) 22. 03709097 / TVIC 5 (idle, oil & gas production) 23. 03709101 / TVIC 11 (idle, oil & gas production) 24. 03709113 / TVIC 25 (active, oil & gas production) 25. 03709118 / TVIC 30 (active, oil & gas production) 26. 03709139 / TVIC 55 (active, oil & gas production) 27. 03709140 / TVIC 56 (active, oil & gas production) 28. 03709145 / TVIC 62 (active, oil & gas production) 29. 03709149 / TVIC 74 (active, oil & gas production) 30. 03720042 / TVIC 64 (active, water injection) 31. 03720069 / TVIC 54 (active, oil & gas production) 32. 03720462 / TVIC 69 (idle, oil & gas production) 33. 03722281 / TVIC 220 (active, water injection) 34. 03722541 / VRU 254 (active, oil & gas production) 35. 03723170 / VRU 261 (active, oil & gas production) 36. 03725079 / TVIC 268 (active, water injection) 37. 03725221 / VRU 284 (active, water injection) 38. 03725222 / TVIC 271 (active, water injection) 39. 03725256 / TVIC 272 (active, water injection) 40. 03725342 / TVIC 100 (active, oil & gas production) 41. 03725375 / TVIC 101A (active, oil & gas production)		
OVERALL TOTAL		
Abandoned wells		28
Existing Active or Potentially Active Wells		41
		=====
TOTAL		69
Key well data inactive, plugged and abandoned well data active, oil and gas production well data active, water injection well data idle and potentially active, oil and gas production or water injection		
Notes i Status of existing wells reflects data maintained by the California Division of Oil, Gas and Geothermal Resources (DOGGR) as of July 2015. Although not included in the list above, DOGGR indicates well NW Extension 920 (API# 03726595) is a pending well that has been permitted by DOGGR, but not yet constructed. However, this well was not approved or permitted by the City of Culver City and does not constitute an existing 2015 well. To construct it as a new well, a Drilling Use Permit would need to be obtained from the City of Culver City.		



0 500 1,000 Feet

Existing (2015) City IOF Conditions

Inglewood Oil Field Specific Plan

Source(s): Google Earth Aerial (02-2016); City of Culver City (2016); Planning PLUS/P+ (2017).

FIGURE

4

2.3.2 Surrounding Area

The City IOF is located at the outer edge along the eastern side of Culver City. Surrounding properties to the north are developed with low-density residential uses (i.e., single-family homes within the Blair Hills neighborhood), the Blair Hills Park, the Stoneview Nature Center, and public open space managed by the Baldwin Hills Conservancy, which includes trails and the Baldwin Hills Scenic Outlook. Property to the east includes the Kenneth Hahn State Recreation Area within the City of Los Angeles. Adjacent property to the south and southeast is unincorporated land occupied by oil-related uses within the County of Los Angeles portion of the IOF and governed by the Baldwin Hills Community Standards District (CSD), which was adopted by the County in October, 2008. Surrounding properties to the west include commercial/industrial uses and the Culver City Park and Culver City “Bone Yard” Dog Park. The Ballona Creek is located less than 0.25 miles to the west, on the opposite side of Jefferson Boulevard. Not immediately adjacent, but nearby to the southwest is the Raintree residential neighborhood within Culver City, and the West Los Angeles College campus within the County.

Uses within the City IOF were initially established in the 1920s, when this land was annexed to the corporate limit of Culver City. The intensity and configuration of active oil-related facilities has transitioned over the past 90+ years since they were first established. Much of the residential development established to the north of the Specific Plan area was developed in the late 1950s. Commercial and industrial development to the west was developed during the late 1950s and early 1960s, with some of the parcels having since been redeveloped as recently as 2013. The Raintree condominium community was developed in the early-to-mid 1970s.

The area surrounding the City IOF has steep terrain toward the north while areas to the east and south are gentle rolling hills. While some portions of the City IOF are visible from the residential areas to the north and west, the intervening topography obscures large sections of the oil field from surrounding locations. The nearest residences are those that are upslope and located along Stoneview Drive.

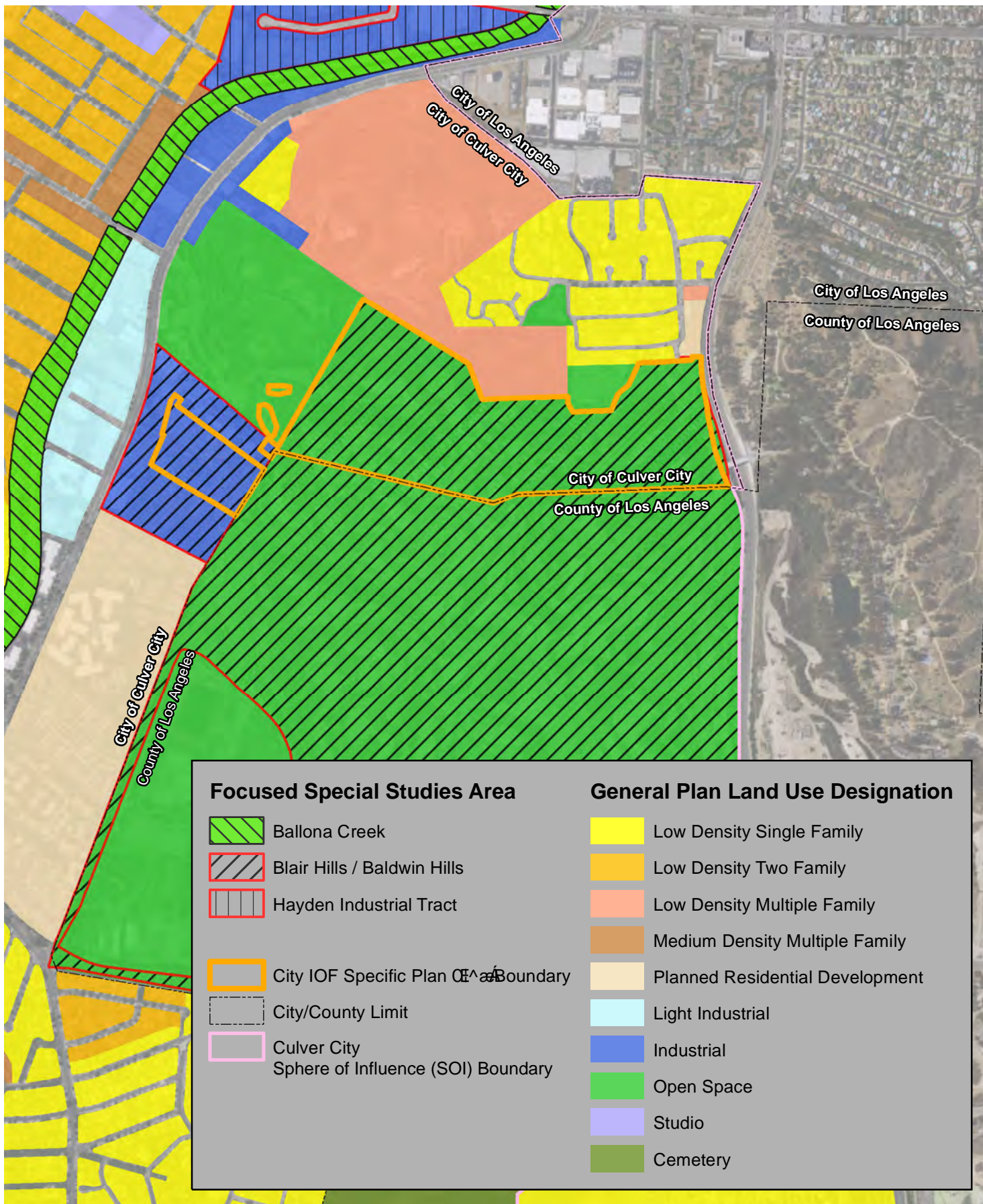
While oil uses are spread throughout the City IOF, active and potentially active wells sites are generally concentrated within the southern half of the area (which is relatively level compared to the northern half). In addition, there is an observed clustering of wells in that portion of the City IOF that is within and adjacent to the Culver City Park, specifically within the vicinity of the Bone Yard Dog Park.

Slopes to the north are heavily disturbed but covered by patches of native vegetation typical of the California Sagebrush Scrub and Grasslands plant communities.

2.4 CURRENT POLICIES AND REGULATIONS

2.4.1 General Plan

The City IOF is located within the corporate limits of the City of Culver City and subject to the policy guidance of the Culver City General Plan. The Culver City General Plan designates the majority of the City IOF (i.e., Areas 1, 2 and 3, see [Figure 2](#)) as open space use, with the remaining portion to the west (Area 4) designated as industrial use. Further, the entire City IOF area, as well as approximately 370 acres immediately south of the Specific Plan area that lies within the unincorporated County but within Culver City’s adopted sphere of influence, is designated as the Blair Hills/Baldwin Hills Focused Special Study Area. [Figure 5, General Plan Land Use Designations](#), shows the existing underlying land use designations in relationship to the City IOF Specific Plan boundary.



General Plan Land Use Designations

Inglewood Oil Field Specific Plan

Source(s): Google Earth Aerial (02-2016); City of Culver City (2016); Planning PLUS/P+ (2017).

FIGURE

5



0 1,000 2,000 Feet

The California Government Code (section 65300) requires cities and counties, as political subdivisions of the State of California, to adopt and update, at regular intervals, a general plan. The City's General Plan was updated and adopted July 22, 1996, and periodically amended thereafter. In 2016, the City Council authorized preparation of a comprehensive update of the Culver City General Plan. This update is to be initiated spring 2018, with completion anticipated in 2021.

The Culver City General Plan serves as the long-range and policy planning tool for the City to guide physical development within its borders. The Culver City General Plan splits the designation of the City IOF between open space and industrial designations. Additionally, the entire City IOF sits within a larger overall area designated as a Focused Special Study Area. Each of these designations is oriented toward an intended future long-range use. This Specific Plan anticipates that the underlying long-range planning policies and land use designations remain unchanged (although the land use designations may be subject to future use consideration through the pending General Plan update, which is independent of the scope of this Specific Plan), and that those will guide land use development in the future once the current oil-related uses are removed. The City IOF Specific Plan area boundary defines the geographical area for which the Specific Plan serves as the interim policy program for oil and gas drilling and production operations, and/or until such time that a Baldwin Hills/Blair Hills Focused Special Study (or an equivalent comprehensive study/plan addressing a specific future development program) is prepared and adopted to implement the long-term land uses contemplated under the General Plan. More detailed discussion of the land use policy objectives and relationship to the General Plan are provided in Chapter 3.0 of this Specific Plan.

2.4.2 Zoning

The Zoning Code, Title 17 of the Culver City Municipal Code (CCMC), implements the Culver City General Plan through corresponding zone categories. Each zone specifies the permitted land uses and applicable development standards for that zone. The City IOF is located within three zones:

- **R1** – Residential Single Family. The R1 zone permits single-family residences and related structures, as well as churches, schools and recreation uses. All of Area 1, except for an approximately 0.25-acre area along the west edge, is zoned R1.
- **IG** – Industrial General. The IG zone permits a range of light-to-medium industrial uses, including manufacturing and processing uses, along with limited service uses. All of Area 4, and a small 0.25-acre portion along the west edge of Area 1, is zoned IG.
- **OS** – Open Space. The OS zone is intended for non-private open space and recreational facilities that are accessible to the general public. All of Areas 2 and 3 are zoned OS.

Oil drilling and oil and gas production activities are not specifically identified as permitted uses for any zone district in Culver City. However, CCMC Section 17.610.010.D provides that "land that has been used for drilling, production, or processing of oil, gas, or other hydrocarbons, may continue in that use, regardless of the applicable zoning district," and such oil uses are deemed a legal non-conforming use.

Because development of the IOF, including oil-related uses within the City IOF, precedes most other uses in the immediate area and has been in existence since the 1920's, oil-related development within the City IOF is recognized as a legal nonconforming use allowed in the R1,

IG and OS zones per CCMC Section 17.610.010.D. It is the only area of the City where oil-related activities are allowed to continue as a nonconforming use.

As a nonconforming use, the oil drilling and production use has been allowed to continue within the City IOF, provided that Drilling Permits are first obtained as required by the provisions of CCMC Chapter 11.12.

By adoption of this Specific Plan, new and updated provisions are established (replacing the previous provisions of CCMC Chapter 11.12) to set forth regulations under which oil-related uses may continue within the City IOF as a nonconforming use. With adoption and implementation of the City IOF Specific Plan, oil uses and oil-related activities, including the drilling of new wells and redrilling of existing wells, may continue as an interim nonconforming use.

Under this Specific Plan, the City IOF retains its underlying zoning of R1, IG and OS, which function as the intended standards for any potential future non-oil related development/uses within the Specific Plan area. While this Specific Plan does not change the underlying zoning, it does establish regulations and standards to govern the interim oil-related activities within the City IOF as described in this Specific Plan. However, the Specific Plan prohibits any expansion of oil uses beyond the current geographical extent (i.e., the extent of the City IOF area boundary). The definitions for “City IOF” and “City IOF Specific Plan” are incorporated as part of the CCMC through adoption of this Specific Plan and its related Drilling Regulations, thus reaffirming the status of oil uses within the boundaries of the City IOF Specific Plan as legal nonconforming uses that will be allowed to continue only as governed by the limitations and regulations of the City IOF Specific Plan.

Figure 6. Zone Districts, shows the existing underlying zoning in relationship to the City IOF Specific Plan area boundary.

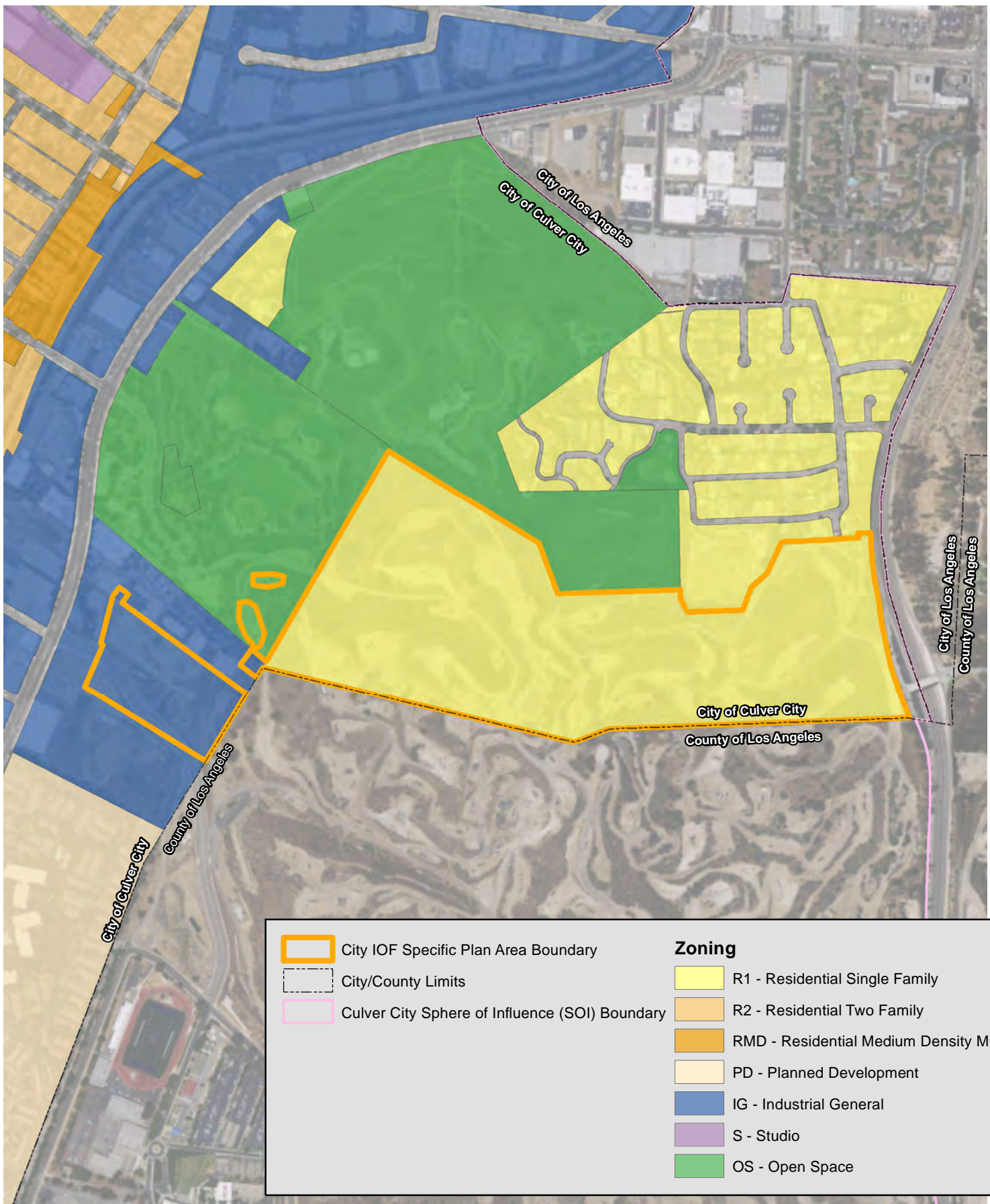
The Specific Plan establishes a land use program and regulations that are unique to the City IOF in allowing oil-related uses. The Drilling Regulations implemented under this Specific Plan (see **Appendix C**, Draft Drilling Regulations) replace CCMC Chapter 11.12, which previously regulated oil, gas and hydrocarbon operations throughout Culver City. The Drilling Regulations, as a component of the City IOF Specific Plan, establish new site-specific land use and operational regulations to govern all oil-related uses and activities in the City IOF.

CCMC amendments (Ordinance Nos. 2018-XX and 2018-XX) (1) repeal CCMC Chapter 11.12, Oil, Gas and Hydrocarbons; (2) adopt the Culver City Inglewood Oil Field Specific Plan; (3) amend CCMC Chapter 17.570 to establish the Specific Plan; and (4) amend CCMC Section 17.610.010.D to specify that the Specific Plan regulations apply to oil and gas uses in the City IOF.

2.4.3 California Oil & Gas Regulations

The California Division of Oil, Gas, and Geothermal Resources (DOGGR) was formed in 1915 and oversees the drilling, operation, maintenance, and plugging and abandonment of oil, natural gas, and geothermal wells. The program is designed to regulate the development of oil, natural gas, and geothermal resources in the state through standardized engineering practices for the purpose of protecting the environment, preventing pollution, and ensuring public safety.

The *California Code of Regulations* (CCR, specifically Title 14, Chapter 4)) and the *California Public Resources Code* (PRC, specifically, Section 3000) codify DOGGR’s responsibilities. Section 3106 of the PRC mandates DOGGR to supervise the drilling, operation, maintenance,



Zone Districts

Inglewood Oil Field Specific Plan

Source(s): Google Earth Aerial (02-2016); City of Culver City (2016); Planning PLUS/P+ (2017).

FIGURE

6

and abandonment of oil wells for the purpose of preventing the following: 1) damage to life, health, property, and natural resources; 2) damage to underground and surface waters suitable for irrigation or domestic use; 3) loss of oil, gas, or reservoir energy; and 4) damage to oil and gas deposits by infiltrating water and other causes. DOGGR also publishes a number of instruction manuals related to the drilling, testing and maintenance of oil and gas wells.

In addition to any local permitting requirements, written approval from DOGGR is required prior to changing the physical condition of any well. The operator's notice of intent (notice) to perform any well operation is reviewed for engineering and geological factors. For new wells and alteration of existing wells, approval of the proposal depends primarily on the protection of all subsurface hydrocarbons and fresh waters; protection of the environment; use of adequate blowout prevention equipment; and use of approved drilling and cementing techniques. DOGGR must be notified to witness or inspect all operations specified in the approval of any notice. This includes tests and inspections of blowout prevention equipment, reservoir and freshwater protection measures, and well-plugging operations.

In addition, DOGGR regulates and maintains historically abandoned wells and also maintains a database of historical wells.

The rules for onshore subsurface disposal and injection operations are found in the *California Code of Regulations* (CCR) Article 3 (Requirements) of Subchapter 1 (Onshore Well Regulations). Section 1724.6 provides that approval must be obtained from DOGGR before any subsurface injection or disposal can begin. The operator must provide the pertinent and necessary data for the evaluation of a proposed project. Section 1724.10 stipulates filing, notification, operating, and testing requirements for underground injection wells and projects. The CCR (specifically, Title 14, Division 2, Chapter 4, Section 1774) specifies oil field maintenance practices related to oil field facilities. Additional environmental protection rules for subsurface disposal are found in CCR Article 3 (Requirements) of Subchapter 2 (Environmental Protection). Section 1775(a) states that oil field wastes shall be disposed of in a manner that does not damage life, health, property, freshwater aquifers, surface waters, natural resources, nor menace public safety.

2.5 OPPORTUNITIES, CONSTRAINTS AND ISSUES

2.5.1 Development Opportunities and Constraints

Among other conditions, the City IOF is constrained by local topography, limited access, existing surrounding development (included sensitive land uses), an interface along the majority of its outer limit boundary with active and passive recreational facilities, the Culver City corporate limit and local regulations with limited applicability to modern oil uses and activities. Physical environmental conditions that influence decisions concerning the programmatic planning for the City IOF include the following:

- The City IOF is bordered along the north and west by development within the City of Culver City. Adjacent developed uses include residential, commercial and recreation. The Kenneth Hahn State Recreation Area is located east of the City IOF, and the area to the south consists of other oil field uses established within the County IOF.
- The City IOF is unique in that it is part of a larger functional and operating oil and gas production field, located amidst a highly urbanized area, having little to no room for spatial expansion outside the Oil Field's current boundaries.

- The Blair Hills are in the northeastern portion of the City and rise up to about 400 feet above mean sea level at the City IOF area.
- Ballona Creek is located less than 0.25 miles to the west.
- The City IOF features rolling terrain, with on-site elevations ranging from approximately 90 feet above mean sea level along the western edge (i.e., Area 4), to 420 feet above mean sea level in the central portion (of Area 1). As such, the City IOF area is quite elevated and can be seen by most of the surrounding community.
- The most rugged and steep portions of the Inglewood Oil Field have been disturbed and modified over numerous decades by construction of well and tank pads, access roads, treatment plants, oil, water and waste sumps.
- The City IOF area includes an Alquist-Priolo Earthquake Fault Zone (i.e., the Newport-Inglewood Fault Zone), which is seismically active and a part of the San Andreas Fault System. Approximately one-to-two miles northwest and west of the City IOF are two faults not associated with the Newport-Inglewood fault. They are the Overland Avenue and the Charnock faults, which are considered potentially active.
- The City of Culver City is located within the approximately 130-square mile Ballona Creek Watershed, which is located on the coastal plain of the Los Angeles basin, with the Santa Monica Mountains on the north and the Baldwin Hills on the south.
- No perennial or ephemeral streams are located within the Inglewood Oil Field. However, six retention basins ultimately drain to Ballona Creek, located approximately 1,600 feet west of the City IOF area. The six surface water retention basins/ponds are located along primary drainages to retain surface runoff from the IOF. There is one retention basin (i.e., the Dabney Lloyd Basin [Basin 002]) located along the eastern margin of the City IOF area, which discharges to the Los Angeles County storm drain system and ultimately discharges to Ballona Creek. Ballona Creek eventually drains into the Pacific Ocean, approximately 5.25 miles southwest of the City IOF.
- The City IOF is located above the Coastal Plain of Los Angeles groundwater basin, in the far eastern portion of the Santa Monica Basin. Specifically, the area is above the Crestal Subbasin, one of the five subbasins within the Santa Monica Basin. Groundwater depths in the area have been detected at depths of approximately 50 to 70 feet below ground surface in and near the IOF.
- Vegetation scattered throughout the City IOF area includes: degraded California sagebrush/buckwheat scrub; California sagebrush scrub; eucalyptus naturalized forest; disturbed/degraded scrub; ruderal or weed dominated areas; ornamental; and non-native ice plant dominated areas. Ornamental areas contain landscaped gum tree windrows (*Eucalyptus spp.*) adjacent to roads. Two vegetation types that have been previously mapped within the City IOF are considered special status: California sagebrush scrub, and California sagebrush-California buckwheat scrub. No federally or State listed plant species are expected to occur within the City IOF area.
- The majority of habitat within the IOF has been fragmented and isolated by oil field operations. Wildlife species that could occur within the City IOF area include small rodents, common reptiles, small mammal predators and a wide variety of bird species.

- CCMC Section 17.610.010.D treats existing oil uses within the City IOF as a legal, nonconforming oil use, and, because this land has been continually used for the drilling, production, or processing of oil, gas, or other hydrocarbons, such use is allowed to continue within the applicable existing zoning district(s), which do not specifically permit or allow oil uses.
- Existing regulations, set forth in the provisions of CCMC Chapter 11.12, currently require the City Council's consideration and determination whether permits should be issued to allow the drilling, redrilling or deepening of any well hole throughout the City in areas where oil uses have been previously established.
- As land uses surrounding the City IOF intensify and new development/uses encroach toward the City IOF outer edge, community concern as to the potential compatibility and health risks of the oil uses in proximity to nearby residential neighborhoods and park and open space users has come under review.
- Establishment of an updated and clarified permitting process provides an opportunity to develop a comprehensive and integrated plan guiding City IOF improvements and to establish permanent coordinated regulations governing oil uses and operations.

2.5.2 Development Planning Issues

The development concepts in the Specific Plan adapt to physical constraints by envisioning an approach under which outdated field management practices are replaced with practices that improve compatibility and safety as to the adjacent community uses. An emphasis is placed on enhancing the physical interface by minimizing the overall visual appearance of well drilling and oil production activity through setbacks, screening and landscape requirements.

The procedural iterative review process and ongoing monitoring and reporting requirements provided in the Specific Plan replaces the outdated elements of the current regulations. The Specific Plan requires that oil operations are comprehensively coordinated to proactively plan for and seek to minimize or eliminate potential adverse environmental impacts and establish protocols to reduce odor, visual incompatibilities, noise, and health concerns, while at the same time improving the overall safety of the oil uses through appropriate safeguards, controls and best operating and management practices.

2.6 ENVIRONMENTAL COMPLIANCE

The California Environmental Quality Act of 1970 ("CEQA") requires the decision-making body of a Lead Agency to consider the environmental impacts of a discretionary action prior to approving a project. For purposes of implementing CEQA, the City of Culver City is the Lead Agency. As required by CEQA Guidelines section 15064, an Environmental Impact Report ("EIR") is required when a proposed project will result in one or more significant effects on the environment that cannot be mitigated to a less-than-significant level. The City has determined that an EIR is the appropriate level of environmental review to ensure compliance with the CEQA. An EIR was prepared to evaluate and disclose the environmental impacts anticipated through the adoption and implementation of the City IOF Specific Plan. The EIR was certified and adopted by the Culver City Council on [DATE TO BE INSERTED]. A copy of the certified EIR is on file with the City's Planning Division and the City Clerk.

2.7 PUBLIC PARTICIPATION PROCESS

In October 2008, the Los Angeles County Board of Supervisors adopted the Baldwin Hills Community Standards District (County CSD), which established the oil and gas regulations, and certified the related Environmental Impact Report (CSD EIR) for that 900+ acre portion of the IOF that lies within the unincorporated Los Angeles County (County IOF). The City of Culver City leadership and many of the community participated in the public review of the County IOF process and voiced concern about operational aspects of both ongoing and potential future oil and gas drilling and production activities in relative close proximity to the Culver City community. The County CSD regulations were supplemented through a Settlement Agreement resulting from subsequent litigation by Culver City, challenging the adequacy of the CSD EIR under the California Environmental Quality Act (CEQA). Both the County CSD and the Settlement Agreement are applicable only to the County IOF.

Following the County process and litigation settlement, the City of Culver City initiated the process of establishing more robust regulation for oil and gas production activities within the City IOF (with the intent of replacing the existing regulations set forth Chapter 11.12 of the Culver City Municipal Code). In April 2013, Culver City released to the public the *Discussion Draft Oil Drilling Regulations for the Culver City portion of the Inglewood Oil Field* (the “Draft Drilling Regulations”). Following an informal public review and comment period, the City Council adopted (in June 2014) a resolution declaring its intention to initiate preparation of the Inglewood Oil Field Specific Plan for the City IOF (the “Draft Specific Plan”). Although the provisions of the Draft Drilling Regulations and Draft Specific Plan are unique to the circumstances of the City IOF, its surrounding community and desired level of City oversight, many of the reporting and monitoring requirements are modeled in part from the County CSD regulations.

Since June 2014, City staff has worked with a team of consultants to prepare the Draft Specific Plan and related Draft Environmental Impact Report (the “Draft EIR”). Prior to and during that time, the City outreached to the then Oil Field Operator in an effort to coordinate on the planning process in an effort to obtain a fuller understanding of the existing oil field operations and potential future operational considerations. The Oil Field Operator was given the opportunity to proceed with an application for a Comprehensive Drilling Plan and declined to do so. Subsequently, the City moved forward with the Specific Plan process as a City-initiated effort and had targeted a public release date of March 30, 2017 for both the Draft Specific Plan and Draft EIR.

Sentinel Peaks Resources (SPR) became the Oil Field Operator in January 2017 and requested an opportunity to discuss the Draft Drilling Regulations with the City. The release date of the Draft Specific Plan and Draft EIR was postponed in order to conduct an April 17, 2017 community meeting and provide SPR the opportunity to present its request to the City Council as to options for allowing SPR to participate more directly in the regulatory process for the City IOF. At community meetings held on April 17 and July 11, 2017, the City Council received public input on issues affecting the City IOF, the scope of the environmental review and potential requirements of the Specific Plan, and determined to move forward with its City-initiated project.

The Public Draft Drilling Regulations, City IOF Specific Plan and the related Draft EIR were released for public review and comment on September 15, 2017 through [DATE TO BE INSERTED]. Subsequent to the release of the Project documents, two informational community meetings were held on October 24 and October 30, 2017, to address questions regarding the contents of and review process for the Specific Plan, Drilling Regulations and EIR.

Public participation has been invited throughout the planning and decision-making process.

CHAPTER 3.0 DEVELOPMENT PLAN

3.1 CONCEPT OVERVIEW

3.1.1 Development Overview

The City IOF Specific Plan is intended to govern ongoing and future oil-related uses, including potential drilling of new wells and redrilling of existing wells, within an approximate 77.8-acre area defined as the City IOF. Also, under the Specific Plan, the number of potential new or redrilled wells is capped at 30 wells over the 15-year drilling period under the Specific Plan.

According to DOGGR records (July 2015), at the time of Specific Plan adoption there are 69 existing wells having top-hole locations within the City IOF boundary. Thirty-six are active (production or injection) wells and five wells are idle.¹ The other 28 wells are plugged or abandoned. In addition, DOGGR indicates that one well has been permitted by DOGGR, but never drilled. Because this one well² has not been permitted by the City of Culver City, and does not physically exist, it is not recognized by the City as an existing or permitted well.

In total, the City IOF is currently comprised of 41 existing operational or potentially operational (i.e., active or idle) wells. Upon complete build out of the Specific Plan, which allows up to a maximum of 30 new wells, future conditions within the City IOF could result in a peak total of 71 operational or potentially operational wells, or overall a collective total of 99 wells (i.e., active, idle and abandoned). If developed to full capacity, the net change³ of the City IOF would be an increase of 30 new wells. In addition, other program requirements may result in physical changes to existing facilities over time.

The Specific Plan provides that up to two newly drilled or redrilled wells can be constructed during the first two plan-years, and up to three wells per year thereafter (subject to approval by the Community Development Director), up to the maximum of 30 new or redrilled wells total. At the end of the 15-year drilling period under the Specific Plan, the total number of active or idle (i.e., operational or potentially operational) wells could be as many as 71, if no other wells are abandoned during that time. The net change in operable or potentially operable wells is an increase up to the maximum of 30 wells.

At the end of the 15-year drilling period under the Specific Plan, no additional wells could be drilled or redrilled. However, reworking of existing wells and other related operational and

¹ The number of active and idle wells as indicated herein is representative of a “snap shot” in time at which this document and the related EIR were prepared. The Oil Field Operator has the ability to alternate well status between active and idle in compliance with DOGGR regulations. For the purpose of characterizing the existing condition in this Specific Plan, any non-active well that has not been formally plugged or abandoned (in compliance with DOGGR), is assumed to have the potential to become active. Hence, although the number of “active” or “idle” wells may vary periodically, the total number of operational or potentially operational wells would always be the combined total of both.

² Well NW Extension 920 (API#03726595) is listed as a “pending” well by DOGGR; however, it was not constructed and has not been entitled by any permit from the City of Culver City. Therefore, this well does not count as either an active or potentially active (i.e., idle) well prior to adoption of this Specific Plan.

³ “Net change” in this context refers to the difference between existing and future conditions, which is calculated by subtracting the “current” existing number of wells from the “proposed” maximum allowed number of future wells.

maintenance activities would be allowed to continue in accordance with the provisions of this Specific Plan prior to abandonment.

In the event that a substantial number of existing wells are “redrilled” or “abandoned” (see Chapter 4.0 for definition of these terms), the net change at Specific Plan buildout could be less than the maximum 71 operational or potentially operational wells (because operational wells may be removed from service or potential new wells forfeited in order to extend the life of existing wells by redrilling).

A summary of existing and proposed wells, as discussed above and as provided by the City IOF Development Plan, is provided in Table 3-1, Overview of City IOF Specific Plan Well Development.

Table 3-1: Overview of City IOF Specific Plan Well Development

Well Status Category ⁱ	Maximum Number of All Wells	Maximum Number of Active/Potentially Active Wells
Existing Abandoned Wells	28	na
Existing Active or Potentially Active Wells	41	41
Potential Future New Wells (allowed under the City IOF Specific Plan)	30	30
	=====	=====
TOTAL	99	71
i Status of existing wells reflects data maintained by the California Division of Oil, Gas and Geothermal Resources (DOGGR) as of July 2015.		

In addition to oil wells, ancillary oil production and operational equipment and facilities are established throughout the City IOF, and similar new facilities are anticipated as new wells are implemented. Provisions of the Specific Plan prohibit some types of facilities (i.e., sumps, wastewater detention ponds, and processing facilities) or restrict the potential size and/or location of some types of facilities (i.e., storage tanks). Chapter 4.0 (Development Standards and Guidelines) of this Specific Plan provides expanded discussion of the type of facilities that are allowed within the City IOF.

3.1.2 City IOF Specific Plan Objectives

The primary purpose of the City IOF Specific Plan is to establish safeguards and controls for activities related to drilling for and production of oil, gas, and other hydrocarbon substances within the IOF. The following Specific Plan objectives provide guidance for how development and operations of oil and gas exploration and production activities within the City IOF will be governed.

1. Oil Operations are conducted in a comprehensively coordinated manner consistent with a programmatic plan for a defined physical area and in harmony with adjacent land uses and in a manner that protects the public health, safety and welfare, and the environment;
2. Cooperation and coordination among affected and adjacent government agencies in implementing all reasonable measures to reduce impacts to the surrounding communities;
3. Cooperation and coordination for multi-agency response to Oil Field emergency situations;

4. Minimization or elimination of potential adverse environmental and public health and safety impacts of Oil Operations by the implementation of area-specific regulations and mitigation measures;
5. Before new Oil Field drilling activities are permitted, that existing Oil Field facilities are in compliance with the requirements of this Specific Plan;
6. Minimization of Oil Field emergencies; in the event that an emergency occurs, regulations are in place to assist affected and adjacent government agencies in identifying all reasonable measures to reduce impacts to surrounding communities;
7. Appearance of the Oil Field site is enhanced with landscaping and other property maintenance requirements in order to preserve and improve the visual character and quality of the surrounding uses; and
8. New applications for oil and gas Drilling Use Permits address the consolidation of Oil Field facilities to reduce odor, visual, noise, safety, health, and environmental impacts from Oil Operations to surrounding land uses and City residents.

3.2 LAND USE CONCEPT

The City IOF Specific Plan area shall be comprehensively planned as a single oil-field operation related to the IOF, accommodating existing established oil uses and new, future oil uses, including the drilling (or redrilling) of up to 30 new (or redrilled existing) wells. The City IOF represents the extent of the known surface field boundary (77.8 acres) within the City of Culver City for which the IOF Oil Field Operator maintains surface access rights.

The Land Use Concept establishes a land use program for the implementation of oil uses and provides the framework under which a future “Comprehensive Drilling Plan” may be submitted and approved. This section introduces broad land planning concepts to be implemented through development standards as provided in Chapter 4.0 (Development Standards and Guidelines) of this Specific Plan and that serve as a guide for physical improvements and operations of the City IOF. The Land Use Concept designates the type and location where oil-related development and uses may be established and summarizes policy guidance to be incorporated into future drilling programs.

3.2.1 Relevant General Plan Policy

The intent of the General Plan is to communicate the City’s strategic thinking, philosophies and visions for the future to residential and business communities and to adjacent jurisdictions and agencies that affect, or are affected by, the City. The intent of the General Plan is to provide for the physical, social and economic needs of the City and its people. The Culver City General Plan is comprised of nine elements: Land Use, Circulation, Housing, Open Space, Noise, Conservation, Seismic Safety, Recreation, and Public Safety.⁴

Citywide Goals. The Culver City General Plan seeks to provide for the physical, social and economic needs of its people. To achieve a balance of quality of life with the economic support necessary to sustain that quality, the following goals have been established to achieve this balance:

- Residential neighborhoods that offer residents the qualities of a peaceful, small-town environment.
- Economic vitality that serves the community and protects the quality of life.
- An urban design, urban forest, open space network that links neighborhoods and businesses, and instills civic pride.
- A community that provides recreational, historical, and cultural opportunities.
- Clear and consistent guidance for balanced growth.
- Ample and efficient City services and infrastructure.
- Integrated local and regional transportation systems that serve residential and business needs.
- A peaceful community that minimizes noise disturbance.
- Clean air that provides a healthy environment.

⁴

Relevant Culver City General Plan elements are referenced in this Specific Plan as follows:

LUE – Land Use Element (1996, amended 2000)

CE – Circulation Element (1995)

OSE – Open Space Element (1994)

NE – Noise Element (1995)

CNE – Conservation Element (1973)

SSE – Seismic Safety Element (1974)

RE – Recreation Element (1968)

PSE – Public Safety Element (1975)

- A safe community.
- A community that minimizes waste and protects its natural resources.

More particularly, the following General Plan policies influence the Land Use Concept for the City IOF Specific Plan:

LUE Objective 1: Neighborhood Character. Protect the low- to medium-density character of residential neighborhoods throughout the City.

LUE Policy 1.B: Protect the City's residential neighborhoods from the encroachment of incompatible land uses and environmental hazards which may have negative impacts on the quality of life (such as traffic, noise, air pollution, building scale and bulk, and visual intrusions).

LUE Policy 10.J: Establish criteria for those circumstances and uses that are appropriate for non-permanent or atypical structures.

LUE Objective. Urban Design. Ensure that new construction and renovation of existing residential and nonresidential buildings and streetscapes are accomplished with the highest quality of architectural and site design.

LUE Policy 12.A Support and implement the numerous policies stated throughout different sections of the General Plan that address the desired form and character of future development in the City. Refer to the following Policies, and the Goals and Objectives they support:

- *LUE Policy 27.A-27.D: Southeastern Sub-Area aesthetic identity, visual resources, and viewshed guidelines*
- *OSE Policy 4.A and Policy 4.C: natural resource buffers and development guidelines*
- *OSE Policy 5.A-5.I: visual open space and urban design improvements*
- *OSE Policy 6.A: viewshed guidelines*

LUE Objective 15. Policy and Administration. Establish clear and internally consistent policies for development.

LUE Policy 15.C: Streamline the project approval process.

LUE Objective 16. Land Use Compatibility. Encourage mutually compatible land uses.

LUE Policy 16.F: Establish noise, safety, aesthetic and access criteria for areas impacted by existing incompatible land uses.

LUE Objective 18. Adjacent Jurisdictions. Coordinate development to minimize conflicts with adjacent jurisdictions.

LUE Objective 27. Protect and enhance residential and business uses within the Southeastern Sub-Area.

LUE Policy 27.B: Protect the visible and usable open space resources within Blair Hills by establishing land use definitions for visual resources and natural areas that include guidelines for use. (See General Plan Open Space Element.)

LUE Policy 27.D: Protect views of and from Blair Hills by establishing viewshed guidelines. (See General Plan Open Space Element.)

LUE Policy 27.E: Protect existing hillside uses and potential future uses by updating existing studies and requiring new ones concerning soil and seismic stability in Blair Hills, with respect to the Alquist-Priolo Earthquake Fault Zone and earthquake faults.

OSE Policy 4.C Establish standards for buffers and access within areas to be preserved as natural areas.

3.2.2 Development Concept and Plan Features

The City IOF has been established in this hillside area of Blair Hills and has been an established part of the Culver City community since the 1920's. The Land Use Concept strives to ensure that build out of the City IOF is consistent (if not improved) with the existing character of the City IOF, and compatibility with the surrounding residential community and the city-wide character. The Land Use Concept works in concert with the Open Space and Recreation Plan to ensure that existing scenic views from the Baldwin Hills Scenic Outlook and surrounding Baldwin Hills/Blair Hills open space areas and trails are preserved and maintained.

Overall, the Development Plan strives to reflect a program for the continuation of nonconforming oil drilling and oil production and operation activities within the City IOF that is sensitive to the surrounding residential neighborhoods and to ensure (through both the Development Plan and Drilling Regulations) that any increase of City IOF intensity and new structures will be implemented in a manner that avoids or minimizes effects on established neighborhoods. Further, the Land Use Concept and Open Space and Recreation Plan identify areas of private and public open space that are tied to an over-arching General Plan goal to incorporate open space and passive recreational uses both within and adjacent to the City IOF site.

The Land Use Concept considers the entire City IOF as a whole unit and encourages consolidation of City IOF facilities within a centralized core (i.e., allowed development area) while preserving natural areas and steep slopes as open space. This provides for a comprehensive approach to planning of the entire City IOF property that minimizes unnecessary obstacles and promotes higher quality design, rather than a well-by-well approach that would otherwise be both inefficient and limited toward accomplishing higher quality design features.

Consistent with Specific Plan Objective 1, a primary function of this Specific Plan is to ensure that oil operations within the City IOF are conducted in harmony with adjacent land uses. Further, Objective 8 seeks to address the consolidation of City IOF facilities (see Section 3.2.2.2 below for discussion on "consolidation"). Accordingly, the Land Use Concept takes under consideration the distance, type and characteristics of land uses surrounding the City IOF (which are described in Section 2.3.2 of this Specific Plan). Surrounding land uses are grouped into two categories for reference in the Specific Plan:

- *Developed Area.* Any lot or parcel of land containing any residential, recreational (e.g. public park), institutional (e.g. school), commercial, industrial or office structure, or used for residential, recreational, institutional, commercial, industrial or office purposes. This definition does not include structures that serve administrative functions in the IOF.
- *Sensitive Developed Area.* A lot or parcel that contains a single or multi-family residence, park, school, or health care facility.

Based on the above definitions and review of the existing surrounding land uses, the edge of the Developed Area coincides with the east, north and west boundaries of the City IOF. No Developed Area occurs south of the City IOF because that area is the continued extension of oil uses within the County IOF. Uses representative of the Sensitive Developed Area about the City IOF in the vicinity of the Culver City Park and the Stoneview Nature Center and Stoneview Drive residential area. For other segments along the City IOF boundary, Sensitive Developed Area uses are separated from the City IOF by other non-sensitive uses (i.e., undeveloped open space), and thus the edge representative of the Sensitive Developed Areas may be located either coincident with the City IOF boundary or stepped back to the nearest qualifying sensitive use.

The edge boundaries for the Developed Area and Sensitive Developed Area are shown in Figure 7. Surrounding Developed Areas and Sensitive Uses. The Sensitive Developed Area edge shown in this exhibit is based on developed land use conditions at the time this Specific Plan was adopted. If new sensitive uses are developed adjacent to the City IOF outer boundary in subsequent years, the edge boundary for the Sensitive Developed Area may change and thus any City IOF uses that require review in reference to this edge would be based on the condition at the time any Annual Consolidation and Drilling Plan or Drilling Use Permit is requested. The Developed Area edge is not anticipated to change overtime because it already represents the maximum buildout condition of the surrounding area for defining the Developed Area edge.

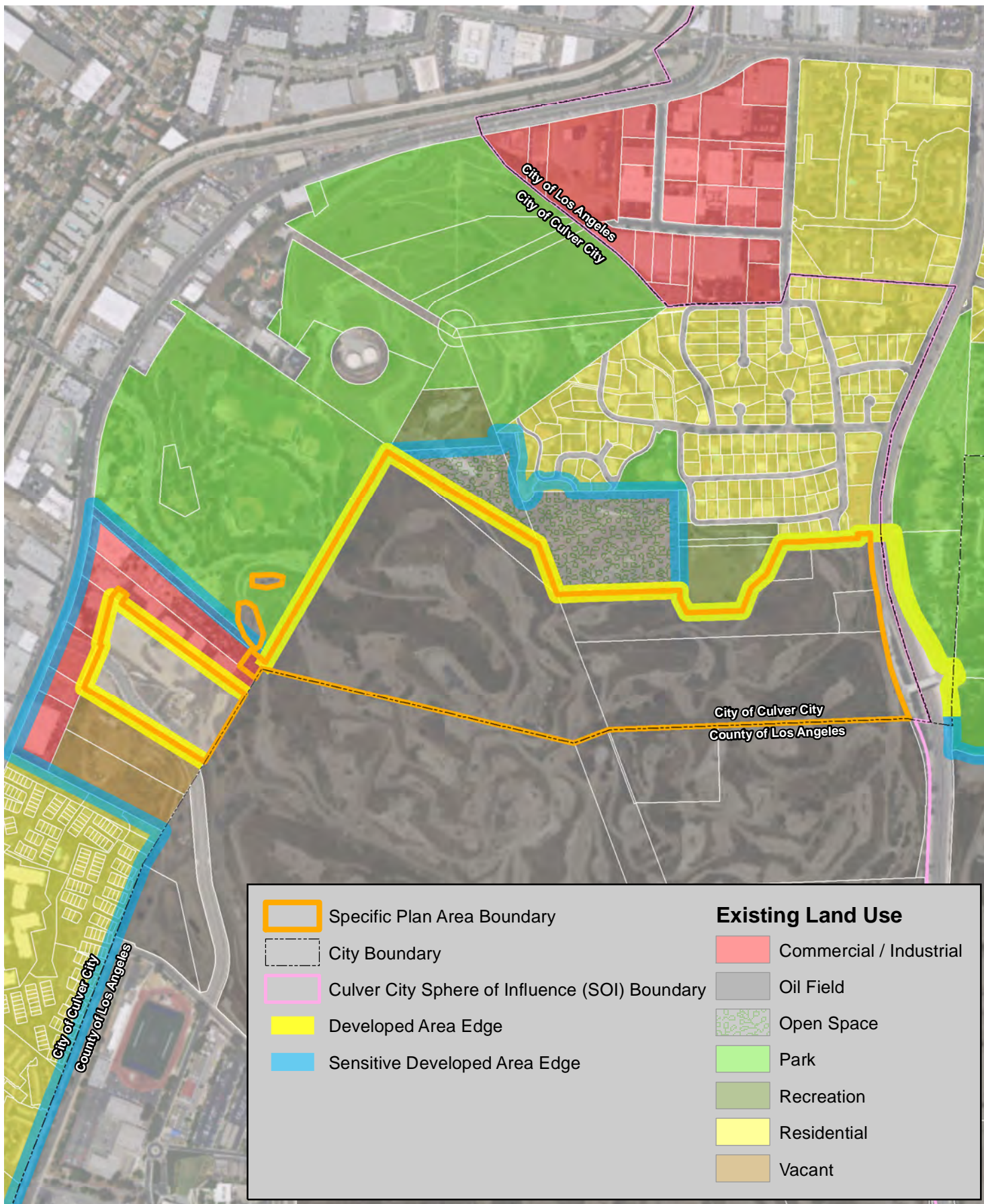
The Developed Area and Sensitive Developed Areas are reference points that are the foundation of the Land Use Concept. From these two reference points, the Land Use Concept establishes land area categories within the City IOF for relating to allowed oil uses and development. Primarily, these categories are the “Allowed Drilling” area and the “Drilling Permitted with Special Setback Reduction Approval” area, as follows:

- *Allowed Drilling Area.* Any area that is setback at least 400 feet from the edge of the Developed Area, and setback at least 75 feet from the edge of a public road.
- *Drilling Permitted with Special Setback Reduction Approval Area.* Any area that is less than 400 feet setback from the edge of the Developed Area.

Figure 8. Designated Drilling Areas and Setbacks Plan, illustrates the Allowed Drilling and Drilling Permitted with Special Setback Reduction Approval areas. The “Allowed Drilling” area totals approximately 27 acres that consists of the central and southern portion of Area 1 (see Figure 2 for location of plan reference areas). The “Drilling Permitted with Special Setback Reduction Approval” area totals approximately 51 acres comprised of the northerly 400-foot wide “setback” buffer area within Area 1, and the entirety of Areas 2, 3 and 4.

Secondary land area categories within the City IOF are defined in reference to the Sensitive Developed Area. These are the “Deep- and Mid-Zone Well Drilling Allowed” area and the “Deep- and Mid-Zone Well Drilling by Supplemental Approval” area, as follows:

- *Deep- and Mid-Zone Well Drilling Allowed Area.* Any area that is setback at least 800 feet from the edge of the Sensitive Developed Area.
- *Deep- and Mid-Zone Well Drilling by Supplemental Approval Area.* Any area that is between the 800-foot setback from the edge of the Sensitive Developed Area and the Developed Area edge.

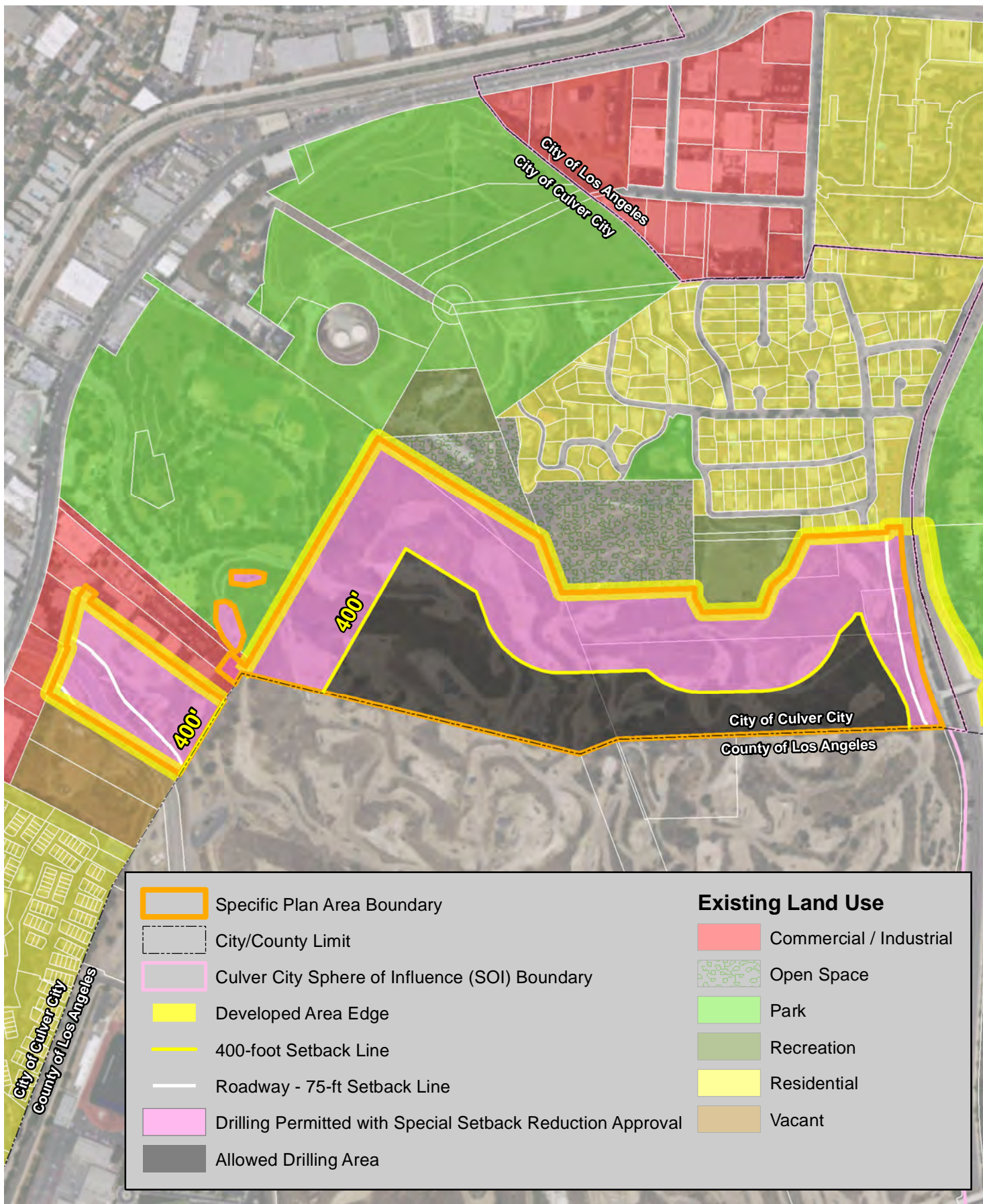


Surrounding Developed Areas and Sensitive Uses

Inglewood Oil Field Specific Plan
Source(s): Google Earth Aerial (02-2016); City of Culver City (2016); Planning PLUS/P+ (2017).

FIGURE

7



Designated Drilling Areas and Setbacks Plan

Inglewood Oil Field Specific Plan

Source(s): Google Earth Aerial (02-2016); City of Culver City (2016); Planning Plus (2017).

FIGURE

8

Figure 9, Designated Deep- and Mid-Zone Drilling and Supplement Areas Plan, illustrates the “Deep- and Mid-Zone Well Drilling Allowed” and the “Deep- and Mid-Zone Well Drilling by Supplemental Approval” areas. The “Deep- and Mid-Zone Well Drilling Allowed” area totals approximately 7.5 acres that consists of the most central and southern portion of Area 1. The “Deep- and Mid-Zone Well Drilling by Supplemental Approval” area totals approximately 70 acres comprised of the northerly 800-foot wide “setback” from the Sensitive Developed Area edge that includes a majority of Area 1, and the entirety of Areas 2, 3 and 4.

The Land Use Concept addresses the entire 77.8-acre City IOF area and establishes policy guidance for:

- Existing Wells and Facilities
- New Wells and Facilities
- Abandoned Wells and Field Restoration

♦ **3.2.2.1 Existing Wells and Facilities**

While this Specific Plan focuses primarily on planning and permitting of new drilling and facilities, the previously developed nature of the City IOF is recognized and influences current and future operations within the Plan area. It is intended that existing facilities be accommodated within the overall planning program. With regard to existing well site locations and related operations and facilities, the Land Use Concept does not establish specific limitations for the location or type of these existing facilities. Further, it is anticipated that existing facilities may continue to operate within any area of the City IOF, provided no significant changes are made to the manner in which these wells/facilities are operated and/or maintained. However, the Specific Plan and its related Drilling Regulations require that when the Oil Field Operator proposes to redrill any existing well, certain land use considerations and permits would be required prior to any redrilling. The requirements for any redrilled well are similar to requirements for “new wells”, which are discussed below.

Within the defined Allowed Drilling Area, the Land Use Concept envisions the continuation of existing oil and gas production and operation activities and the consolidation of such existing facilities over time. An existing well previously permitted by a Well Permit (if any) issued by the City of Culver City shall continue to comply with the requirements/conditions of a valid permit.

Once a Comprehensive Drilling Plan has been submitted and approved, the operation and management of existing well sites and facilities shall be in conformance with the provisions of the approved Comprehensive Drilling Plan.

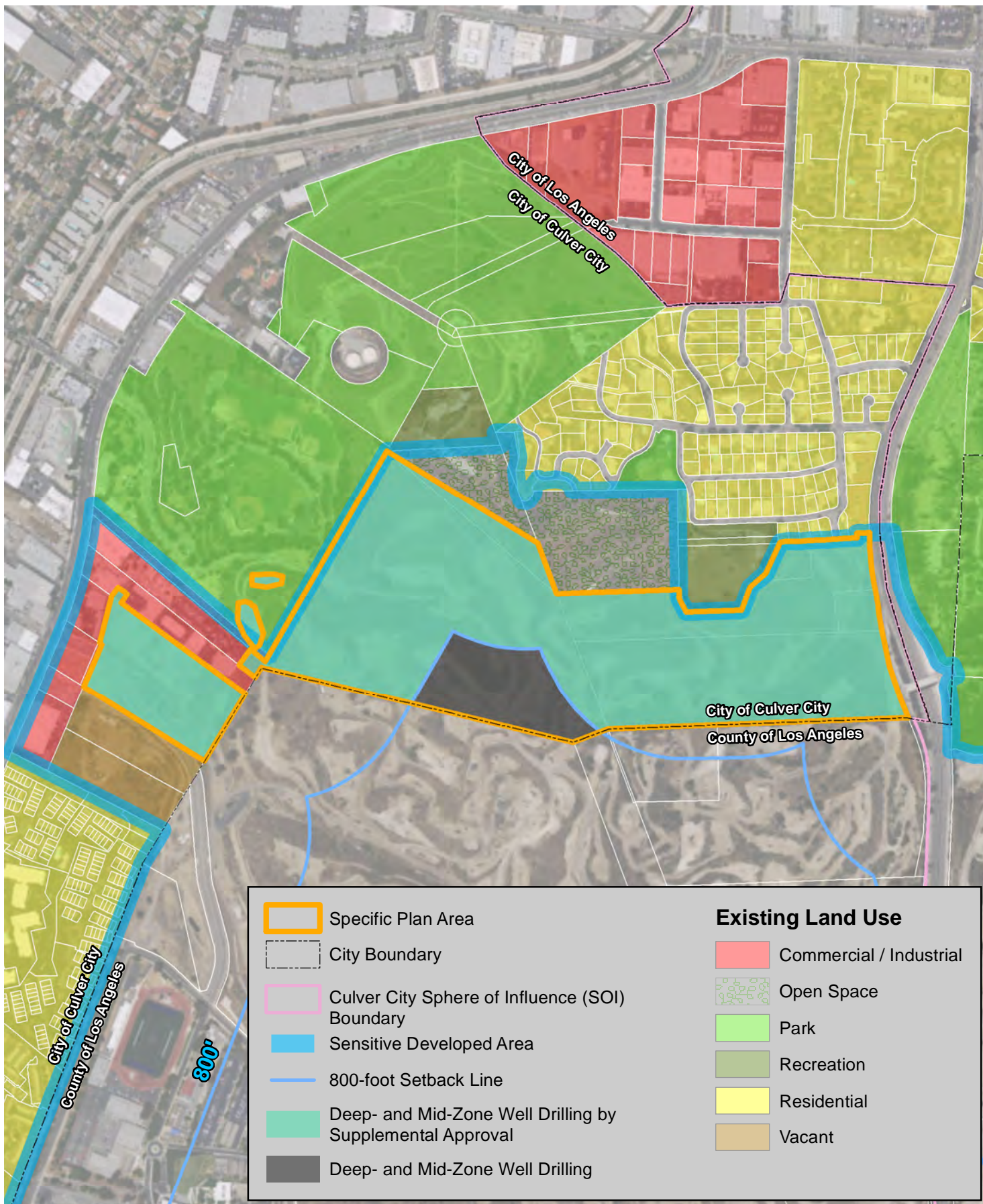
The proposed abandonment of any existing well or wells, or any other existing facilities within the City IOF, shall be in compliance with the abandonment and restoration process required by the Drilling Regulations, as discussed below.

♦ **3.2.2.2 New Wells and Facilities**

New Drilling and Redrilling Limited to Allowed Drilling Area

The drilling⁵ of all new wells or redrilling⁶ of any existing wells shall be setback at least 400 feet from the edge of any Developed Area and at least 75 feet from any public roadway. The area

⁵ Drilling means the digging or boring into the earth for the purpose of exploring for, developing, extracting or producing oil, gas, or hydrocarbon substances from the earth or for the purpose of injecting



0 500 1,000 Feet

Designated Deep- and Mid-Zone Drilling and Supplemental Areas Plan

Inglewood Oil Field Specific Plan

Source(s): Google Earth Aerial (02-2016); City of Culver City (2016); Planning PLUS/P+ (2017).

FIGURE

9

outside of either setback area shall represent the “Allowed Drilling” area. The area represented by the either setback shall describe the “Drilling Permitted with Special Setback Reduction Approval” area. These areas are shown in Figure 8.

Within the defined Allowed Drilling Area, the Land Use Concept envisions the continuation of existing oil and gas production and operation activities and the concentration of any future new wells or enhancements (i.e., redrilling) of existing wells.

When there is sufficient cause to demonstrate a need for drilling outside of the Allowed Drilling area (i.e., within the 400-foot setback area), new wells may be established or existing wells may be redrilled within the Drilling Permitted with Special Setback Reduction Approval area subject to approval by the City Council, and only when it can be determined that drilling/redrilling within this area will not be detrimental to the public health, safety or welfare, or the environment.

Oil Well Development Limits

The overall development intensity of new well construction within the Specific Plan site will not exceed 30 new or redrilled wells. Based on existing conditions described in Chapter 2.0, Planning Context, of this Specific Plan, the maximum number of wells within the City IOF shall not exceed 99 total wells (i.e., active, idle and abandoned wells), nor shall the total number of active or potentially active (i.e., idle) wells exceed 71.

Consistent with Specific Plan Objective 8, new applications for oil and gas Drilling Use Permits shall address the consolidation of City IOF facilities, meaning that while new development and uses may be added during the lifetime of the Specific Plan, such new facilities shall be restricted primarily to the Allowed Drilling Area within the Specific Plan area. Further the abandonment of existing oil uses, especially those located within the Drilling Permitted with Special Setback Reduction Approval zone of the Specific Plan, is encouraged. Policy guidance for well abandonment is discussed below.

Slant Drilling⁷ and Redrilling of Deep-Zone and Mid-Zone Wells

The drilling of all new wells or redrilling of all existing wells for which the bottom-hole location extends either below 3,500 feet or 8,000 feet below ground surface (bgs) shall employ slant drilling whenever feasible to do so in order to locate the well top hole as far from the Sensitive Developed Area edge as may be reasonably necessary to mitigate impacts. More specifically, the following shall apply:

- *Deep-Zone Wells.*⁸ When the top-hole location of any Deep-Zone well is closer than 800 feet to the edge of any Sensitive Developed Area, the well drilling program shall require Supplemental review and approval to consider special conditions to minimize the potential effects to uses and occupants within the adjacent Sensitive Developed Areas. Such

water, steam, or any other fluid or substance into the earth, but does not include remediation efforts to clean-up or remove contamination.

⁶ Redrilling means any drilling operation conducted through the surface opening of an existing well to deepen the existing well or to create a new bore hole diverting below the surface of the earth from an existing bore of an existing well.

⁷ Slant drilling means the non-vertical drilling, directional drilling, or drilling at a relatively significant angle.

⁸ A Deep-Zone Well is any well where the bottom hole is proposed in a deep zone (i.e., Nodular Shale and Sensitive zones or any other production zone located at 8,000 feet below ground surface or deeper).

supplemental review shall evaluate the potential to employ slant drilling techniques as an option to facilitate the placement of the drilling site construction activities at least 800 feet, or otherwise as far setback as reasonably feasible, from the edge of any Sensitive Developed Area.

- *Mid-Zone Wells.*⁹ When the top-hole location of any Mid-Zone well is closer than 800 feet to the edge of any Sensitive Developed Area, the well drilling program shall require Supplemental review and approval to consider special conditions to minimize the potential effects to uses and occupants within the adjacent Sensitive Developed Areas. Such supplemental review shall evaluate the potential to employ slant drilling techniques as an option to facilitate the placement of the drilling site construction activities at least 800 feet, or otherwise as far setback as reasonably feasible, from the edge of any Sensitive Developed Area.

The “Deep- and Mid-Zone Well Drilling Allowed” and the “Deep- and Mid-Zone Well Drilling by Supplemental Approval” areas are illustrated in Figure 9.

Consolidation of Existing and New Wells and Oil Field Facilities

The Land Use Concept encourages consolidation of City IOF facilities, existing and new, consistent with Objective 8. Accordingly, the Land Use Concept establishes the Allowed Drilling Areas as a centralized core buffered from the surrounding community and facilitating the preservation of natural areas and steep slopes as open space. New applications for oil and gas Drilling Use Permits shall address the consolidation of City IOF facilities, meaning that while new development and uses may be added during the lifetime of the Specific Plan, such new facilities shall be restricted primarily to the Allowed Drilling Area within the Specific Plan area. Further the abandonment of existing oil uses, especially those located within the Drilling Permitted with Special Setback Reduction Approval zone of the Specific Plan, is encouraged, thereby reducing the overall geographic area occupied by active wells and related oil facilities.

The concept of consolidation within the Land Use Concept is multi-faceted, and not limited to spatial measurement. In the context of this Specific Plan, consolidation may mean the clustering of multiple wells or City IOF facilities within a geographically smaller footprint, including for example, consolidation within a portion of the Specific Plan area that is outside the 400-foot setback from Developed Areas, or the grouping of wells and facilities within pre-determined consolidated well site areas. Consolidation may also include the consolidation of facilities overall to provide for improved efficiency and sharing of infrastructure. Consolidation may also include concepts for the staged abandonment of wells, or the replacement of older, outdated and obsolete facilities with more efficient and improved technology or equipment accompanied by placement of such technology or equipment within approved areas to preserve or improve the visual character and/or protect natural resources and open space areas.

◆ **3.2.2.3 Abandoned Wells and Field Restoration**

The Comprehensive Drilling Plan and each Annual Consolidation and Drilling Plan shall address the consolidation of City IOF facilities with an emphasis on restricting the location of new

⁹ A Mid-Zone Well is any well where the bottom hole is located in a mid-zone (i.e., Rubel, Moynier, Bradna, and City of Inglewood zones and any other production zone located between 3,500 feet and 7,999 feet).

facilities to primarily within the Allowed Drilling Area, and encouraging the abandonment¹⁰ and minimization of existing oil uses located within the Drilling Permitted with Special Setback Reduction Approval area. The abandonment and consolidation of facilities shall be coordinated in accordance with any Well and Well Pad Abandonment Plan or Oil Field Abandonment Procedures programs approved by the Community Development Director. Well abandonment and field restoration activities, including the de-construction of any well site, the removal of all related surface facilities, the remediation (if any) of contaminated soils, and the restoration of slopes and revegetation of disturbed surfaces areas is allowed throughout the City IOF, subject to approved Construction Management Plan and Restoration Plan protocol.

♦ 3.2.2.4 ***Other City IOF Facilities, Uses and Considerations***

Oil uses have been established within the City IOF since the 1920's. These uses shall be allowed to continue as legal nonconforming uses, only in accordance with the limitations and regulations of the City IOF Specific Plan.

In addition, improvement projects are allowed within the City IOF, in and around the existing and new well development. Non-well development within the City IOF may include the establishment of tanks, transport pipelines and other allowed uses as set forth in Chapter 4.0 of this Specific Plan. Overall, no major facilities (i.e., processing facilities) shall be constructed within the City IOF. Construction activities shall be limited to those necessary for new production and injection wells and associated equipment (tanks, pipes, piping components, etc.) that are needed to support access to such wells and equipment, or as needed for emergency construction activities, such as repairs after earthquakes, floods, or landslides or other catastrophic events.

Other minor improvements as appropriate to support City IOF operations under the parameters of this Specific Plan, including improvements related to the implementation of required environmental enhancement, emergency preparedness and public safety measures, shall also be allowed throughout the City IOF to meet the implementation requirements of this Specific Plan. Also included is the establishment of landscaping in compliance with any visual screening requirements, revegetation/restoration programs, or visual open space interface enhancement treatments.

In addition to drilling and routine oil production operations, the reworking¹¹ of wells is allowed throughout the City IOF and well stimulation treatment¹² activity is potentially allowed within the Allowed Drilling Area, in accordance with the provisions of this Specific Plan and its related Drilling Regulations.

¹⁰ Abandonment means the permanent plugging of a well, pipeline, or other facility in accordance with the requirements of DOGGR, the removal of all equipment related to the well, including the restoration of the drill site or well operation site as required by DOGGR regulations.

¹¹ Reworking means the recompletion of an existing well, which includes operations such as liner replacements, perforating and acidizing, but does not include deepening or sidetrack operations that extend beyond the existing well bore. The principal piece of equipment used for reworking is sometimes referred to as a workover rig.

¹² Well stimulation treatment means any treatment of a well designed to enhance oil and gas production or recovery by increasing the permeability of the formation. Well stimulation treatments include, but are not limited to, hydraulic fracturing treatments and acid well stimulation treatments. Well Stimulation Treatments do not include steam flooding, water flooding, or cyclic steaming and do not include routine well cleanout work, routine well maintenance, routine removal of formation damage due to drilling, bottom hole pressure surveys, or routine activities that do not affect the integrity of the well or the formation.

The City IOF is located amid encroaching urban uses and it partially occupies land (within the northeast portion of Area 1) that has been purchased by the Baldwin Hills Regional Conservation Authority (BHRCA) for open space, conservation and recreational uses. Physical improvements within this area include the planned alignment of Segment C of the Park-to-Playa trail system, connecting Kenneth Hahn State Park (east of the Specific Plan area) to the Baldwin Hills Scenic Outlook and the Ballona Creek Trail, to the north and east, respectively. Passive recreation uses and structures, consistent with the utilization of the open space designation (see Chapter 3.3 of this Specific Plan), are allowed within the City IOF area and should be sited as close to the Developed Area edge as reasonably feasible to avoid conflict with existing and future oil uses and facilities.

Temporary uses and structures are allowed throughout the City IOF, as appropriate, during approved construction activity and/or as needed for emergency operations.

3.2.3 Implementation Program

The entire City IOF is regulated by the City IOF Specific Plan, which addresses the continuation of previously established oil uses within the Specific Plan area, including the addition of new wells and related facilities within the existing City IOF footprint. The underlying land-use designations of open space, industrial and Blair Hills/Baldwin Hills Focused Special Study Area remain in effect as the policy guidance for potential other non-oil-related development and land uses. By adoption of this Specific Plan, provisions are established to set forth development regulations under which oil-related uses may continue under the guidelines of a nonconforming use. With adoption and implementation of the City IOF Specific Plan, oil-related activities, including the drilling of new wells and redrilling of existing wells, will be permitted and regulated as an interim use, and allowed to continue only during such time as the legal nonconforming status remains applicable or until the use is discontinued.

Under this Specific Plan, the City IOF retains its underlying zoning of R1, IG and OS, which function as the intended standards for any potential future non-oil related development/uses within the Plan area. This Specific Plan regulates the continuation and potential intensification of oil-related uses for an interim period, as set forth in this Specific Plan. However, the Specific Plan prohibits any expansion of oil uses beyond the current extent (i.e., the extent of the City IOF boundary). Adoption of this Specific Plan reaffirms the status of oil uses within the footprint of the City IOF Specific Plan as legal nonconforming uses that will be allowed to continue only in accordance with the limitations and regulations of the City IOF Specific Plan.

The Land Use Concept shall be implemented through the submittal (by the Oil Field Operator) and approval (by the City of Culver City) of the required Comprehensive Drilling Plan, Consolidation and Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plans (the “Annual Consolidation and Drilling Plan”), the Deep- and Mid-Zone Supplemental Drilling Plan(s), and Drilling Use Permit(s). Each plan and permit shall demonstrate consistency with the policy guidance provided in Chapter 3.0, Development Plan, of this Specific Plan. The Oil Field Operator shall obtain approval of the following:

1. **Comprehensive Drilling Plan.** A long-range, conceptual plan consistent with this Specific Plan, proposed by each Operator within the Oil Field, which describes and depicts the Oil Operations through the year 2032. This plan is required prior to the issuance of any Drilling Use Permit, for review and approval by the City Council. The Comprehensive Drilling Plan shall be filed by each Operator and shall address all proposed drilling/redrilling activity anticipated during the Specific Plan timeframe. The Comprehensive Drilling Plan shall document existing conditions, including a surface

survey of wellheads, and provide a description of the location, type and size of projected future well sites.

2. Annual Consolidation and Drilling Plan. The Annual Consolidation and Drilling Plan is required to be submitted annually, following approval of the Comprehensive Drilling Plan, prior to the end of the calendar year for which the upcoming Annual Plan year pertains. The Oil Field Operator shall submit an Annual Consolidation and Drilling Plan the Community Development Director for review and approval. The Annual Consolidation and Drilling Plan shall clearly document and demonstrate that: (a) the City IOF activities are in compliance with the total maximum and annual maximum well drilling/redrilling cap set forth in the Specific Plan; (b) the proposed City IOF activities proposed in the Plan year are coordinated to ensure that the maximum number of drilling or reworking rigs will not be exceeded per the provisions set forth in the Specific Plan; (c) the proposed City IOF activities are coordinated to ensure that the air pollutant criteria thresholds will not be exceeded in compliance with Mitigation Measure MM AQ-3 per the Mitigation Monitoring and Reporting Program¹³ (MMRP); (d) any anticipated well abandonments are programmed into the Annual Plan; (e) proposed well drilling operations reflect reasonable effort toward consolidation of well drilling operations within the City IOF in order to reduce impacts to surrounding land uses; (f) all required periodic evaluations and updates of operational procedures and technologies (e.g., annual Clean Technology Assessment, annual Quiet Mode Drilling Plan, etc.) have been completed as set forth in the Specific Plan; and (g) the status and data of each operational or potentially operational well is updated to reflect the current annual condition for both the previous year and upcoming year.
3. Deep-Zone and Mid-Zone Supplement to the Annual Consolidation and Drilling Plan. Required as needed for drilling of wells having bottom hole locations within the mid or deep-zone strata.
4. Drilling Use Permit. A City permit reviewed and processed in compliance with this Specific Plan which is necessary to conduct any Drilling Project. More than one Drilling Project may be approved under one Drilling Use Permit, provided that each Drilling Project is a part of the approved Annual Drilling Plan.

The City IOF allowed uses are specifically established in Chapter 4.0, Development Standards and Guidelines. The proposed uses and development standards facilitate an operating philosophy that is consistent with the Objectives of this Specific Plan, as well as the City's General Plan goals, objectives and policies, and which are compatible with the surrounding residential community and known sensitive uses.

In addition, the northerly portion of Area 1 consists of steeply sloped hillside covered with patches of natural vegetation, which roughly correspond to the Natural Area open space category discussed in Chapter 3.3 of this Specific Plan. Substantial improvements or expansion of oil uses are restricted in the Natural Area open space lands within this category to encourage that these areas would remain as open space and undisturbed hillside. Management of this open space is described in the Open Space and Recreation Plan (Chapter 3.3) of this Specific Plan.

¹³ A document that references all the mitigation measures identified in the certified Environmental Impact Report for the City IOF Specific Plan project, that includes a statement(s) of how, when and by whom each mitigation measure will be implemented, monitored and enforced.

General Plan Consistency Considerations

The existing City IOF is consistent with the General Plan designations for this area because the oil uses are interim uses and it is anticipated that they will be discontinued and removed at some indeterminate date in the future. Proposed new oil-related uses and activities within the City IOF, when implemented in accordance with the provisions of this Specific Plan, are consistent with the General Plan designation(s) for this area as an interim use. This Specific Plan implements the Land Use Element and other applicable goals, objectives and policies of the Culver City General Plan. The City IOF Specific Plan is consistent with the goals, objectives and policies of the General Plan, as demonstrated in **Appendix B** (General Plan Consistency).

3.3 OPEN SPACE AND CONSERVATION PLAN

3.3.1 Relevant General Plan Policy

The General Plan Open Space Element (OSE) establishes broad goals for open space within Culver City, including a focus on the Blair Hills/Baldwin Hills area, through these goal statements:

- *GOAL: A community that provides recreational, historical and cultural opportunities.*
- *GOAL: All open space, urban forest, urban design, network that links neighborhoods and businesses, and instills civic pride.*

The General Plan Recreation Element (RE) and Conservation Element (CNE) each are focused more specifically on the desire to see the area within Baldwin Hills and Blair Hills, including lands that are within both the City IOF and the County IOF, become part of a dedicated regional and community open space network.

The following General Plan policies influence the Open Space and Conservation Plan for the City IOF Specific Plan:

OSE Policy 4.A Establish hillside development guidelines for slope, preservation of topographic relief, and habitat preservation.

OSE Policy 4.E Explore the possibility of making open space trail connections to the natural area of Blair Hills from Culver City Park and Blair Hills Park.

OSE Policy 4.F Protect open space and natural areas which contain or support rare, threatened or endangered species.

OSE Policy 6.A Establish viewshed guidelines which protect views of and from Culver City Park, Blair Hills and Culver Crest.

OSE OBJECTIVE 7, Maintenance. Protect open space resources and their users.

CNE Baldwin Hills is identified as area of conservation for future public use.

LUE Policy 1.B Protect the City's residential neighborhoods from the encroachment of incompatible land uses and environmental hazards which may have negative impacts on the quality of life (such as traffic, noise, air pollution, building scale and bulk, and visual intrusions).

LUE Policy 27.B Protect the visible and usable open space resources within Blair Hills by establishing land use definitions for visual resources and natural areas that include guidelines for use. (See General Plan Open Space Element.)

LUE Policy 27.D Protect views of and from Blair Hills by establishing viewshed guidelines.

In particular, the OSE policies for the City IOF and surrounding area are generated to address guidance from the Land Use Element (LUE) and the identification of the Blair Hills/Baldwin Hills Focused Special Study Area. The Focused Special Study for the Blair Hills/Baldwin Hills (to be completed at a future date) is to include standards and guidelines for protection, development and enhancement of existing and potential open space resources. It is intended that the study

for future, long-term uses and development will describe the location and type of open space appropriate within the focused study area and the relationship of open space resources to other identified land uses.

In particular, the General Plan provides that open space potential for the Blair Hills/Baldwin Hills Focused Special Study Areas consider the following:

Blair Hills/Baldwin Hills Area Feasibility Study and Focused Special Study. The undeveloped area within Blair Hills, the industrial properties between Culver City Park, the multiple-family residential area southeasterly of Jefferson Boulevard, and the unincorporated Los Angeles County lands west of La Cienega Boulevard will be the subject of a feasibility study and subsequent Focused Special Study to address the potential for appropriate open space use, residential, industrial and commercial uses, and access. Most of this area has been designated open space on the Land Use Element Map of the General Plan, although the undeveloped area of Blair Hills has previously been zoned for single family residential. The following issues will all be investigated to determine the development capability and benefits to the City:

- *Slope and soil stability*
- *Soil contamination.*
- *Seismic/subsidence risks.*
- *Visual character and view sheds.*
- *Vehicle and pedestrian access.*
- *Cultural and biological resources.*
- *Recreation opportunities.*
- *Protection of existing adjacent residential neighborhoods.*
- *Fiscal impacts*

The benefit and cost of annexing County land into Culver City and the potential development and control of open space resources will also be determined.

The CNE applies almost exclusively to the Baldwin Hills (and Blair Hills) area. Most importantly, the CNE identifies these areas, which includes the City IOF, as areas of conservation for future public use. As described in the CNE, many natural features remain in the area, in spite of the predominance of oil uses for over 90 years. The CNE anticipates a time when oil production and operational activity would be discontinued and other uses of the land explored (presumably through the focused special study area process). At present, the Blair Hills/Baldwin Hills remain predominantly oil fields. Pressures for more intensive development or transition to other uses increase steadily as the wells become less productive and the scarcity of land in the western section of Los Angeles County increases.

3.3.2 Development Concept and Plan Features

Open Space and Land Conservation Planning Context

Consistent with the OSE goals and objectives, the Development Plan for the City IOF, and in particular the Open Space and Conservation Plan, seeks to support community goals to provide, expand and enhance open space, recreational, historical and cultural opportunities within the City (including within and around the City IOF area), while also emphasizing the protection of natural resources and scenic viewsheds.

In some regards, the City IOF area can be characterized as an access barrier to open space amenities because a majority of the land (i.e., 70 percent) is privately owned and isolated from

other surrounding recreational components by fencing for security reasons. The City IOF can also be characterized as a visual barrier to the enjoyment of unobstructed and quality views that are key to the character of the Baldwin Hills and Blair Hills areas.

There are a number of parks and recreational areas that are immediately adjacent to the City IOF. These facilities include the Kenneth Hahn State Recreational Area (KHSRA), Culver City Park, Baldwin Hills Scenic Overlook, Blair Hills Park, and the Stoneview Nature Center. In addition, the Park-to-Playa Trail (Segment C alignment) extends through the northeastern portion of Area 1 of the City IOF. The Ballona Creek Trail is located approximately 0.25 miles to the west. The relationship of these recreational facilities to the City IOF is shown in Exhibit 10, Existing Parks, Recreation, Trails and Open Space Uses.

Although it is neither the purpose or intent of this Specific Plan to serve as, or replace the need for, the intended Blair Hills/Baldwin Hills Focused Special Study Area, this Open Space and Conservation Plan embraces those future objectives and addresses open space planning in the context of an interim use that is tied to and compatible with the continuing oil field operations and activities within the City IOF area, as well as the County IOF area to the south.

The Specific Plan area is located in the Baldwin Hills, which is both the name of a low mountain range in the Los Angeles Basin as well as the name of a neighborhood community in the vicinity. Much of the Baldwin Hills area, and all of the City IOF area, is encompassed within the Baldwin Hills Park Master Plan. The Baldwin Hills Conservancy (BHC) was formed as a State-appointed board to acquire open space in the Baldwin Hills Area. The BHC, in collaboration with other groups, developed a concept for “One Big Park” in the core of the west side of Los Angeles that would be developed in the future as a recreation resource for all Southern California residents. The document serving as the guide for successfully accomplishing the One Big Park goal is the *Baldwin Hills Park Master Plan*. The purpose of the Master Plan is to establish general guiding principles, and it addresses potential project types consistent with the long-term objectives of the BHC. The Master Plan would serve as a guide for future natural open space and parkland acquisition and improvements; facility development and habitat restoration within the Baldwin Hills; and for connections to trails, parks, and other public facilities. The Master Plan is conceptual in nature, providing a vision for the Baldwin Hills that balances recreational and cultural needs of surrounding communities with protection of sensitive native plants and animals and their habitats.

The One Big Park would extend into adjacent communities by way of greenways and pedestrian and bicycle trails and would connect to existing and planned regional trail systems, including the Ballona Creek Trail, the Stocker Street Trail, and the La Brea Avenue Trail. Several concepts have been developed for the One Big Park. These include landscape character, which includes preserving and restoring the existing hills, ridgelines, canyons and central valley; and constructing a land bridge, which would be a one-half mile connection to physically connect the two halves of the site that are currently separated by La Cienega Boulevard; natural lands and open space, and other park activities and facilities.

Consistent with the gradual implementation of the Baldwin Hills Master Plan concept, the City IOF is located amid encroaching Master Plan components and the City IOF partially occupies land that has been purchased by open space and conservation entities. Specifically, approximately 11 acres within the northeast quadrant of Area 1 is owned by the Baldwin Hills Regional Conservation Authority (BHRCA) and is designated through BHRCA as public open space. This same area includes a portion (Segment C) of the regional serving Park-to-Playa Trail.



Existing Parks, Recreation, Trails and Open Space Uses

Inglewood Oil Field Specific Plan

Source(s): Google Earth Aerial (02-2016); City of Culver City (2016); Planning PLUS/P+ (2017).

Although the Baldwin Hills Master Plan concept is recognized as a regional program, the Master Plan is not specifically recognized as a city-approved policy document or administered by the City of Culver City. Rather, the majority of the City IOF is designated as Open Space under the Culver City General Plan (as is approximately 370 acres of the County IOF located to the south of the City IOF and within Culver City's sphere of influence), which establishes appropriate open space and recreation guidance for the City IOF.

City IOF Open Space Program

The Open Space and Conservation Plan serves to increase the amount and network of public and private open space, recreational facilities, and trails for active and/or passive recreation activities within and around the City IOF area while also taking into account the protection of the health, safety and welfare of Culver City citizens and the surrounding communities, and protecting the environment.

Consistent with this objective, the Land Use Concept encourages clustering of wells and facilities in order to consolidate the physical geographic area of oil uses, and to preserve desirable site characteristics (such as open space and views) and mitigate site challenges (such as steep slopes). Through this approach, the Land Use Concept establishes a framework for the planning and management of desired open space and passive recreational features.

The Specific Plan Open Space and Recreation Plan is built around four categories of open space and recreation types defined by the Culver City General Plan (see the General Plan Land Use and the Open Space Elements). These are described as follows:

Natural Areas. The undeveloped hillsides of Culver City contain substantial biological resources which include native plant, bird and mammal species. The coastal sage scrub vegetation, found mostly in the canyon and ravine areas, support various forms of wildlife. Natural areas include valuable and sensitive natural resources, particularly biologically significant habitats within the Blair Hills area. These areas are either privately or publicly owned. For areas defined as natural, access is generally limited to unpaved pedestrian trails; whereas structural development, vehicular access and active recreation uses generally are not compatible.

Visual Open Space. This includes landscaped areas within or adjacent to public rights-of-way, streetscape improvements, and desirable urban design features which visually link neighborhoods and businesses throughout the City. This definition may be applied to setbacks, parkways, medians and other land within the public view. Within Culver City there are approximately 190 acres of privately-owned large parcels of land that function as visual amenities. These include undeveloped areas of Blair Hills, a portion of which is currently an operating oil field.

Passive Recreation. These include landscaped open space areas that are used for passive activities such as sitting, picnicking, walking, informal gatherings and general relaxing. Typically, passive recreation areas may be included within the smaller park facilities (e.g., Blair Hills Park) that provide neighborhood residents the opportunity to enjoy being outdoors without the need to participate in group activities. Passive Recreation areas may also be integrated with Natural Areas to offer low-key recreational opportunities within a natural setting.

Active Recreation. This consists of usable open space areas developed for formal recreation use such as sport fields, courts, facilities for organized play, and Class I bike paths. These areas may be a combination of open landscaped park land and recreation facility buildings. In Culver City, this definition applies to parts of Culver City Park, Veterans' Memorial Park, Fox Hills Park, Lindberg Park, Syd Kronenthal Park, and Culver West Park (which contain sports fields); the

Paddle Tennis Park; and the bike path along Ballona Creek. The active recreation opportunities afforded by these areas bring both neighborhood and community members together to participate in group activities.

The Open Space and Conservation Plan uses these open space categories as building blocks both to define the physical open space plan and to establish protection and management requirements.

The Open Space and Conservation Plan prioritizes maintaining the hillside areas for the purpose of preserving the visual quality of the City, protecting the public from safety hazards, and conserving natural resources. Further, as feasible, the Open Space and Conservation Plan, in combination with the other Development Plans under this Specific Plan, and the development standards and design guidelines, ensure that build out of the City IOF is consistent (if not improved) with the existing character of the City IOF, and compatible with the surrounding residential community and the city-wide character. Further, scenic viewsheds within and onto the City IOF will be preserved and maintained and described in the Landforms, Visual Resources and Visual Management Plan.

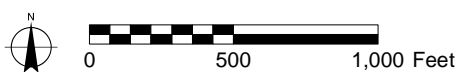
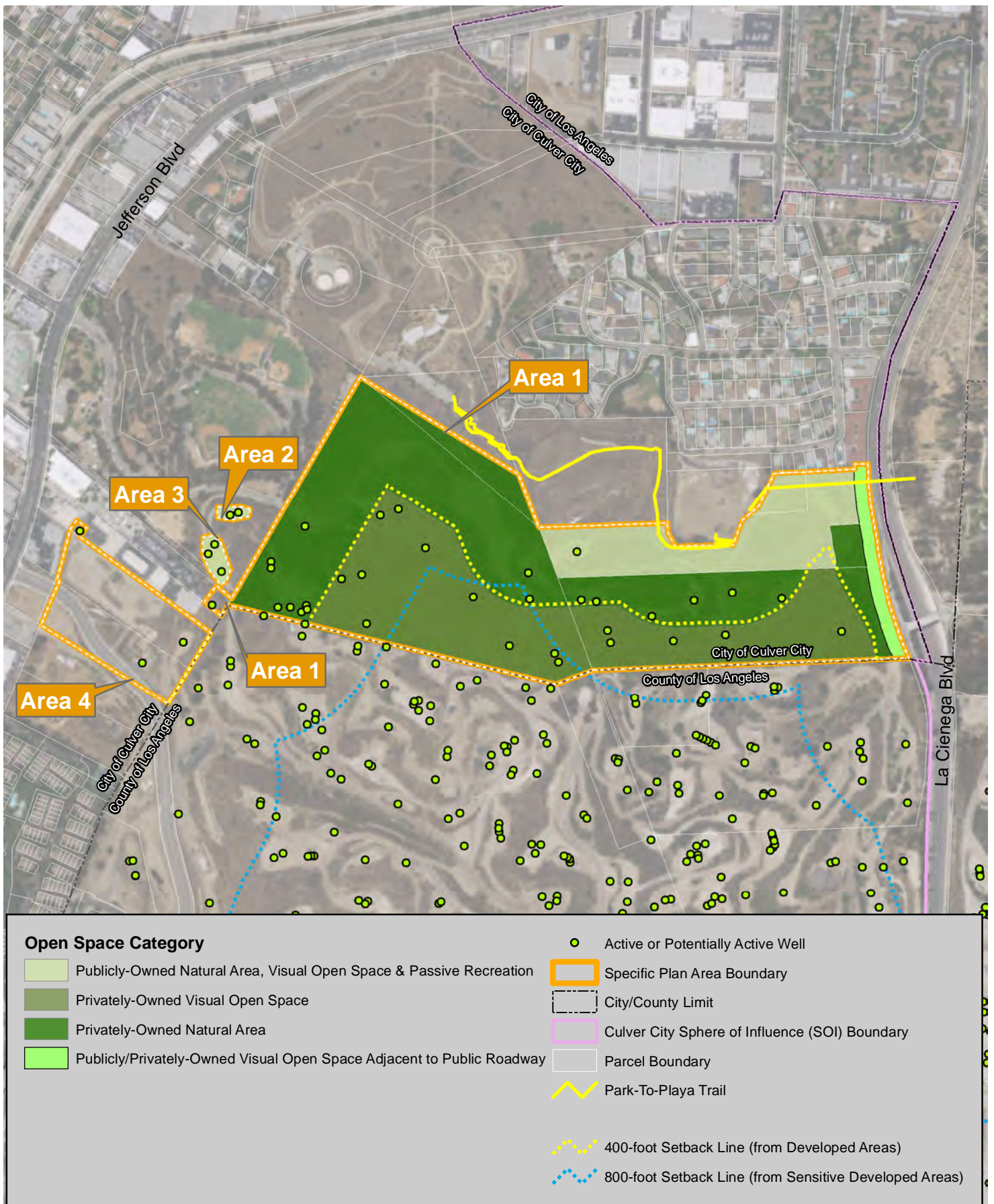
In coordination with the Land Use Concept are provisions for open space and recreational areas. Figure 11, Open Space and Recreation Plan, presents an open space and outdoor recreation plan to distinguish the recognizable open space areas and functional categories associated with the City IOF Specific Plan area. The Open Space and Conservation Plan identifies areas of privately and publicly-owned open space that function as natural area and visual open space and passive recreational uses both within the City IOF area.

The northerly portion of Area 1 consists of steeply sloped hillside covered with patches of natural vegetation, which roughly correspond to the Natural Area category. Approximately 40 acres are designated Privately-Owned Natural Area open space. An additional 11 acres within the northern portion of Area 1 is owned by BHRCA and designated Publicly-Owned Natural Area, Visual Open Space & Passive Recreation. Substantial improvements (i.e., new or expanded well drilling) are discouraged in the Natural Areas as this land lies within the 400-foot setback buffer area and outside the Allowed Drilling Area. Landscaping and screening treatments within the Natural Area (publicly or privately owned) are to be compatible with the native vegetation and sensitive to the visual resources of this area.

The eastern edge of the City IOF abuts La Cienega Boulevard, and which requires a minimum 75-foot setback of all oil uses from this roadway. This area functions as a visible open space corridor along a public roadway. Landscape treatment along this edge should enhance the City IOF interface with the urban edge, while still allowing that distant views of open space and landform features are retained (i.e., landscape choices should complement and avoid obstruction of views to the natural areas to the west).

The remainder area within Area 1 (i.e., coincident with the Allowed Drilling Area) offers an opportunity for Visible Open Space, interspersed with natural areas, consistent with preserving distant views and maintaining a sense of openness.

The approximately 0.75 acres comprising Areas 2 and 3, located within the Culver City Park boundary, are designated as Publicly-Owned Natural Area, Visual Open Space & Passive Recreation. Although this area is located within public park space typically associated with active recreation uses, the hillside location of Areas 2 and 3 (and the immediate adjacent area) is more typical of passive uses and natural open space.



Open Space and Recreation Plan

Inglewood Oil Field Specific Plan

Source(s): Google Earth Aerial (02-2016); City of Culver City (2016); Planning PLUS/P+ (2017).

FIGURE

11

Area 4 is not provided with an open space designation as this area is otherwise designated (and zoned) for industrial uses.

Viewshed protection and management of the natural resources and landforms within each of the open space areas, shown in Exhibit 11, are further discussed in Section 3.6, Landforms, Visual Resources and Visual Management Plan, of this Specific Plan.

3.3.3 Implementation Program

The majority of the Project Site is designated in the General Plan as Open Space and the Specific Plan would allow for the continuation of current nonconforming oil uses in the City IOF with updated restrictions on future development.

The Specific Plan and its related Drilling Regulations incorporate provisions to protect views of and from Culver City Park and Blair Hills. These regulations include:

- restrictions on tank locations;
- restrictions on the number of drill rigs;
- a 400-foot setback for drilling activities;
- limitation on the number of wells to be drilled on an annual basis and at any one time;
- restrictions on well stimulation within the 400-foot drilling buffer from Developed Areas;
- landscaping and painting requirements;

In addition, the Specific Plan Drilling Regulations incorporate several requirements to protect Rare, Threatened, or Endangered species, which would apply throughout the City IOF, but are especially important within the public and private Natural Areas shown in Exhibit 11. These include, but are not limited to:

- revegetation of areas disturbed during an oil spill or clean-up activities;
- preparation of a Special Status Species and Habitat Protection Plan;
- compliance with U.S. Fish and Wildlife and California Department of Fish and Wildlife rules and regulations for listed plant or wildlife species; and
- habitat restoration in sensitive natural habitat areas disturbed by drilling activities.

3.4 INFRASTRUCTURE, UTILITIES AND SERVICES PLAN

3.4.1 Relevant General Plan Policy

The General Plan Circulation Element (CE) establishes broad goals for roadways, city services and local infrastructure through these goal statements:

- *GOAL: Integrated local and regional transportation systems that serve residential and business needs.*
- *GOAL: Ample and efficient city services and infrastructure.*

The following General Plan policies influence the Infrastructure, Utilities and Services Plan for the City IOF Specific Plan:

CE Policy 1A: Facilitate movement of vehicles at intersections and along roadway links by increasing capacity, improving operation, and reducing volumes as appropriate and feasible.

CE Objective 7. Traffic Safety. Minimize traffic hazards and accidents.

CE Policy 7.B: Minimize potential traffic hazards at new developments.

LUE Policy 10.F Continue to require the undergrounding of utilities in all new developments and during replacement of existing service whether alone or as a part of a remodeling project, wherever feasible.

LUE Policy 19.D Coordinate land use policies with the appropriate City departments regarding impacts on staffing and services.

3.4.2 Development Concept and Plan Features

The Specific Plan, and this Infrastructure, Utilities and Services Plan, serves as a policy tool to manage physical improvements within or supporting the City IOF in a manner that ensures adequate services and protects the health, safety and welfare of the Culver City community, and that is protective of the environment. Further, the Infrastructure, Utilities and Services Plan coordinates public infrastructure, utilities, and services with new development within and/or in support of the City IOF, in a manner that takes into account conservation and sustainability (which is discussed more specifically in Chapter 3.7, Environmental Management and Sustainability Plan, of this Specific Plan)

This Infrastructure, Utilities and Services Plan outlines a program to ensure that adequate electricity, water, fire flow and other utilities are available and in place to accommodate improvements and on-going operation of the City IOF and requires that these be set forth in and implemented through the Drilling Regulations. Under this Specific Plan, utility services shall continue to be provided by those currently providing services to the City IOF. No significant demand for other services is anticipated and existing facilities and systems already in place are expected to serve the City IOF at build out.

Further, new development and continued nonconforming oil operations and activity should conform to level of service (LOS) standards and project impact criteria of the City of Culver City and other mandated programs. This includes mitigation of traffic impacts to the surrounding street system and incorporation of any and all mitigations required by the City IOF Specific Plan EIR. In this regard, the EIR analyzed potential impacts related to traffic and roadway levels of

service, due to implementation of the Specific Plan. The EIR determined that impacts related to traffic and level of service would be less than significant and no mitigation is required during operation of the City IOF

Also to facilitate adequate services and minimize the effects on Culver City and County emergency services, the Infrastructure, Utilities and Services Plan requires the proper implementation of the City's adopted building and development codes to provide safe construction (resistant to earthquake, wind, and other structural loading) and responsible building and site preparation practices.

3.4.3 Implementation Program

Section 38 of the Drilling Regulations requires that traffic generated by oil operations avoid peak hours and residential roadways to the maximum extent feasible and that all truck routes and oversized vehicle trips be approved by the Public Works Director/City Engineer. Further, CCMC Section 7.02.210 requires that trucks use designated truck routes

3.5 SAFETY AND HAZARDS MANAGEMENT PLAN

3.5.1 Relevant General Plan Policy

The goals of the Safety Element (PSE) reflect broad aims and basic values, with an emphasis for policy and program formulation. The purpose of the Safety Element is to achieve:

- *Protection of Life and Property*
- *Reduction of Adverse Economic, Environmental, and Social Conditions Resulting from Fires and Geologic Hazards*

Specifically, the following General Plan policies influence the Safety and Hazards Management Plan for the City IOF Specific Plan:

PSE Policy 1. Establish and enforce standards and criteria to reduce unacceptable levels of fire and geologic risk.

PSE Policy 2. Reduce fire hazards associated with older buildings.

PSE Policy 4. Encourage improved fire protection for multi-story structures and high-hazard industrial facilities.

PSE Policy 5. Develop stringent site criteria for construction in areas with fire and/or geologic problems and prohibit construction if these criteria are not met.

PSE Policy 8. Develop and support the use of new technology in the suppression and prevention of fires.

PSE Policy 9. Require all new development and selected existing development to comply with established fire and geologic safety standards.

PSE Policy 10. Improve programs and practices for dealing with land subsidence and erosion.

PSE Policy 13. Review and improve disaster preparedness and emergency response capabilities.

PSE Policy 14. Increase cooperation and coordination between the various jurisdictions and agencies involved in fire protection and the mitigation of geologic problems.

SSE Recommendation 1: Geologic investigations should be required in the hillside areas and along the Inglewood, Overland and Charnock faults. Major considerations in the hillside areas will be cut-slope stabilities, subsidence, possible surface cracking and faulting related to subsidence, oil field operations and related waste sumps, uncontrolled fills and over-steepened cut-slopes. The principal considerations along the fault zones will be their exact location and state of activity.

SSE Recommendation 2: Soils investigations should be required for all developments within the City. Problems of expansive and boggy soil conditions will be particularly important considerations by the soils engineer. Potentially high ground-water conditions could result in the future and should receive the attention of the soils engineer.

SSE Recommendation 5: Specific studies that the City should consider making at this time are: (1) the monitoring of continued rate of subsidence based on continued survey

data available from City and County engineering and survey divisions; and (2) investigation of the Inglewood, Overland and Charnock faults in the subsurface.

3.5.2 Development Concept and Plan Features

The City IOF Specific Plan seeks to ensure that new oil-related development is designed and constructed in an environmentally sensitive and sustainable manner and protects the public health, safety and welfare, and the environment of persons and property within the City of Culver City and surrounding communities. The Safety and Hazards Management Plan establishes a framework to mitigate damage to life, property, infrastructure, and the environment, and economic and social displacement from natural and human-made hazards.

♦ 3.5.2.1 Fire Safety and Wildfire Prevention

Fire Flow (Water) and Fire Suppression System

Implementation of the Specific Plan will require adequate water service (either through permanent water lines or via transported water in temporary holding facilities) to establish and maintain sufficient water service and pressure to meet the fire flow requirements of the City of Culver City/Los Angeles County Fire Department. In addition to provisions for adequate fire flow pressure, implementation of well development plans will include an enhanced on-site fire suppression system that will facilitate the Fire Department's ability to respond to emergencies.

The fire suppression system will be coordinated with both the City of Culver City Fire Department and with the Los Angeles County Fire Department.

Wildfire Prevention and Fuel Modification Management

The City IOF landscape, screening and restoration programs will incorporate a plant palette of drought-tolerant and native species that serve to reduce water use and serve as a sufficient buffer between City IOF development areas and surrounding native vegetation and brush. As required, the Landscape Plan and ongoing maintenance and operation of the City IOF will be in compliance with the "Fuel Modification Plan Guidelines," published by the County of Los Angeles Fire Department. To ensure compliance with fuel modification and setback planning requirements, the draft landscape plan prepared for each major improvement will be reviewed and approved by the Los Angeles County Fire Department.

In addition, the Construction Management Plan for each well site development project shall incorporate provisions for fire safety that include proper use and storage of combustible construction materials and equipment and establishment of appropriate brush clearance in active work areas.

♦ 3.5.2.2 Slope Stability, Geotechnical Performance and Subsidence

The Specific Plan and the Drilling Regulations incorporate provisions that require on-going soils, slope stability, faults, subsidence, seismic and other geotechnical hazards investigations and mitigations. For example, Drilling Regulations Section 24, Geotechnical, requires a site-specific geotechnical investigation to be completed for permanent structures and for grading in excess of 1,000 cubic yards. The Drilling Regulations also include restrictions on gradients, erosion control, and restoration of slopes within 30 days of the discontinuance of use. The Specific Plan and Drilling Regulations also requires an accumulated ground movement plan; an Accumulated Ground Movement Survey; sets ground movement threshold limits; requires a Fault Investigation Report for tanks or structures within the Alquist-Priolo Earthquake Fault Zone;

seismic activity tracking; an Erosion Control Plan; and provisions for slope restoration. The Specific Plan and Drilling Regulations, combined with the mitigation program presented in the Draft EIR, includes requirements that protect the public health, safety and welfare, and protect the environment.

The Specific Plan discourages development or placement of oil-related facilities in areas of known slope instability and/or high landslide risk. Rather, the Drilling Regulations were created to ensure that hillside development will be designed, constructed, and maintained to minimize natural and human-made safety hazards to persons and property. In addition, the Drilling Regulations require that oil-related facilities be designed, constructed and managed in such a manner as to avoid flooding, mudslides, and erosion. Preparation and approval of preliminary soil reports and other engineering or technical documents are required prior to approval of each Drilling Use Permit in order to ensure safe development.

The required Construction Management Plan (see Chapter 3.9 of this Specific Plan) will ensure that best management practices are implemented to control erosion and reduce sediment impacts during construction.

♦ 3.5.2.3 *Seismic Hazards and Risk of Upset*

The Specific Plan restricts the placement of facilities, including tanks and pipelines, across faults. The Drilling Regulations require that a Fault Investigation Report be completed prior to building structures in the Alquist-Priolo Fault Zone (Section 24). The Specific Plan and Drilling Regulations, combined with the mitigation program presented in the Draft EIR, includes requirements that protect the public health, safety and welfare, and protect the environment.

To protect the surrounding community, the Specific Plan and Drilling Regulations establish requirements for monitoring ground acceleration and require contingency procedures when the threshold for ground acceleration is triggered. Further, to enhance public safety to the fullest, the Drilling Regulations require preparation (and administration) of plans and programs to prepare for and provide rapid and effective response to disasters and threats of danger to life and property. These plans and programs will be coordinated with local emergency responders.

The Specific Plan and Drilling Regulations ensure proper implementation of the City's adopted building and development codes to provide safe construction (resistant to earthquake, wind, and other structural loading) and responsible building and site preparation practices.

3.5.3 Implementation Program

The Specific Plan and the Drilling Regulations incorporate provisions that require on-going soils, slope stability, faults, subsidence, seismic and other geotechnical hazards investigations and mitigations. For example, Drilling Regulations Section 24, Geotechnical, requires a site-specific geotechnical investigation to be completed for permanent structures and for grading in excess of 1,000 cubic yards. The Drilling Regulations also include restrictions on gradients, erosion control, and restoration of slopes within 30 days of the discontinuance of use. The Specific Plan and Drilling Regulations also require an accumulated ground movement plan; an Accumulated Ground Movement Survey; sets ground movement threshold limits; requires a Fault Investigation Report for tanks or structures within the Alquist-Priolo Earthquake Fault Zone; seismic activity tracking; an Erosion Control Plan; and provisions for slope restoration. The Specific Plan and Drilling Regulations, combined with the mitigation program presented in the Draft EIR, includes requirements that protect the public health, safety and welfare, and protect the environment.

3.6 LANDFORMS, VISUAL RESOURCES AND VIEWSHED MANAGEMENT PLAN

3.6.1 Relevant General Plan Policy

The following General Plan policies influence the Visual Resources and Viewshed Management Plan for the City IOF Specific Plan:

LUE Policy 11.C Support and implement the numerous policies stated throughout different sections of the General Plan that address the City's tree resources. Refer to the following Policies, and the Goals and Objectives that support tree resources:

- *LUE Policy 6.1: commercial corridor streetscape improvements*
- *LUE Policy 10.A-10.E, Policy 10.H and 10.K: visual open space enhancement through street trees, streetscape amenities, and other open space policies*
- *LUE Policy 27.C and 27.D: Southeastern Sub-Area streetscape improvements and viewshed guidelines*
- *OSE Policy 5.A - 5.D and 5.G: visual open space enhancement through extending park-like qualities throughout the City.*

LUE Policy 12.A Support and implement the numerous policies stated throughout different sections of the General Plan that address the desired form and character of future development in the City. Refer to the following Policies, and the Goals and Objectives they support:

- *LUE Policy 27.A-27.D: Southeastern Sub-Area aesthetic identity, visual resources, and viewshed guidelines*
- *OSE Policy 4.A and Policy 4.C: natural resource buffers and development guidelines*
- *OSE Policy 5.A-5.I: visual open space and urban design improvements*
- *OSE Policy 6.A: viewshed guidelines*

LUE Policy 27.B: Protect the visible and usable open space resources within Blair Hills by establishing land use definitions for visual resources and natural areas that include guidelines for use. (See Open Space Element.)

LUE Policy 27.D: Protect views of and from Blair Hills by establishing viewshed guidelines. (See Open Space Element.)

LUE Policy 27.E: Protect existing hillside uses and potential future uses by updating existing studies and requiring new ones concerning soil and seismic stability in Blair Hills, with respect to the Alquist-Priolo Earthquake Fault Zone and earthquake faults.

OSE Policy 4.A Establish hillside development guidelines for slope, preservation of topographic relief, and habitat preservation.

OSE Policy 4.C Establish standards for buffers and access within areas to be preserved as natural areas.

OSE Policy 4.F: Protect open space and natural areas which contain or support rare, threatened or endangered species.

OSE Objective 6. Viewsheds and Scenic Vistas. Protect view resources, view corridors and scenic viewpoints.

OSE Policy 6.A: Establish viewshed guidelines which protect views of and from Culver City Park, Blair Hills and Culver Crest.

OSE Objective 7. Maintenance. Protect open space resources and their users.

3.6.2 Development Concept and Plan Features

The Open Space and Conservation Plan prioritizes maintaining the hillside areas for the purpose of preserving the visual quality of the City, protecting the public from safety hazards, and conserving natural resources. The Landforms, Visual Resources and Visual Management Plan describes how scenic viewsheds, landforms and other natural resources that contribute to the visual character of the open spaces areas will be preserved and maintained.

Further, the Landforms, Visual Resources and Visual Management Plan, in combination with the other Development Plans under this Specific Plan, and the development standards and design guidelines, ensure that build out of the City IOF is consistent (if not improved) with the existing character of the City IOF, and compatible with the surrounding residential community and the visual character in the Baldwin Hills/Blair Hills area. The Development Plan ensures that existing scenic views from the Baldwin Hills Scenic Outlook and surrounding Baldwin Hills/Blair Hills open space area and trails are preserved and maintained.

One key aspect of preserving visual resources is the limitation of new construction development within the City IOF to be located within the “Allowed Development” area (per the Land Use Concept) and discouraged from encroachment into natural hillside areas, and the “Natural Areas” and “Visible Open Space” areas (as per the Open Space and Conservation Plan).

♦ 3.6.2.1 *Preservation of Natural Features*

The Specific Plan establishes a Development Plan (primarily through the Land Use Concept and Open Space and Conservation Plan) that considers the City IOF as a whole and encourages consolidation of City IOF facilities within a centralized core (i.e., allowed development area) while preserving natural areas and steep slopes as open space. Also, the Specific Plan Land Use Concept and Open Space and Conservation Plan identify areas of privately and publicly-owned undeveloped lands that in the interim are established as open space, which in turn, protects key natural features within the City IOF from significant disturbance.

The City IOF and surrounding vicinity offer panoramic views that shape the character for which the Baldwin Hills and Blair Hills areas are uniquely known. The City IOF is both visible as open space within viewsheds seen from off-site, and also includes hillside areas which can provide viewing opportunities.

The Specific Plan encourages clustering of wells and facilities as one approach toward consolidation of interim oil uses in order to preserve desirable site characteristics (such as open space and views) and mitigate site challenges (such as steep slopes). New oil-related development within the City IOF property will be constructed, managed and maintained to preserve important views, topographic and other natural features, and the semi-rural character of the City’s hillsides. To the extent feasible, applicable standards should preserve ridgelines, natural slopes, knolls, ravines and prominent landforms in their natural state, to the maximum extent feasible, and to protect important views and topographic and other natural features.

The Drilling Regulations serve to minimize the visual impact of grading by required landscaping (revegetation and/or restoration) of human-made slopes to prevent erosion and soften the visual appearance of the finished slope. Also, sensitive siting of oil-related uses and development (i.e., the placement of tanks below ridgelines, the consolidation of facilities away from Natural Areas open space, and the placement and screening of facilities to minimize visibility from public

areas) is required to ensure that the City's natural environment, setting, and viewsheds, are preserved.

♦ 3.6.2.2 ***Site Design, Construction and Operations***

The Specific Plan Development Plan supports development standards and design principles to ensure that buildout of the City IOF is consistent with the existing character of the City IOF(if not improved), and compatible with the surrounding residential community and open space resources. The Specific Plan ensures that existing scenic views from the Baldwin Hills Scenic Outlook and surrounding Baldwin Hills/Blair Hills open space area and trails are preserved and maintained. Further, required land use setbacks, open space buffers and construction screening requirements protect major hillside views visible from points within the City from detrimental alteration by the intrusion of highly visible cuts and/or fill slopes, building lines, and/or road surfaces.

Grading will be completed utilizing best management practices for erosion control and low impact development.

♦ 3.6.2.3 ***Screening, Landscaping and Lighting***

The Specific Plan encourages and supports standards and design guidelines that establish requirements for the placement, duration, sizing and screening of drilling and workover rigs, and other oil-related facilities, both non-permanent and permanent, that are consistent with best operational and management practices for urban drilling activity. An emphasis is placed on enhancing the physical interface by minimizing the overall visual appearance of well drilling and oil production activity through setbacks, screening and landscape requirements.

Overall, the Development Plan provides a comprehensive approach to planning the entire City IOF property that promotes higher quality design, rather than having to rely on a well-by-well approach that would otherwise be both inefficient and limited toward accomplishing higher quality design features.

Outdoor lighting will be designed to ensure that lighting does not spill over onto adjacent residential properties or create nuisance glare. To the extent practical, exterior lighting will be directed downward or upward with lighting directed toward the well drilling operations or oil field facility. A requirement for all night lighting is that exterior lighting shall be installed to direct light away from surrounding residential uses and no direct light is allowed to spill over onto adjacent residential properties.

The Landscape Plan and ongoing maintenance and operation of the City IOF will be in compliance with the "Fuel Modification Plan Guidelines," published by the County of Los Angeles Fire Department. To ensure compliance with fuel modification and setback planning requirements, the draft landscape plan prepared for each well site development project will be reviewed and approved by the Los Angeles County Fire Department.

The plant palette shall be consistent with the objectives of erosion control, overall drought tolerance, and incorporation of native plants, as well as fire-wise plant selection and placement. Transitional plant character shall be provided in areas separating natural slope growth from planted and irrigated areas. Landscape plans should provide for replacement of vegetation removed and restoration of disturbed areas, which will serve as carbon sinks, and minimize heat-island effects (of barren soils and hardpan).

In areas that are adjacent to sensitive vegetation and/or open spaces, new oil-related development will employ site design techniques that provide buffers between the development and the biological resources and that landscape sites with vegetation that is consistent with the adjacent resources, in balance with “fire safe” considerations.

3.6.3 Implementation Program

The majority of the Project Site is designated in the General Plan as Open Space and the Specific Plan would allow for the continuation of current nonconforming oil uses in the City IOF with updated restrictions on future development.

The Specific Plan and its related Drilling Regulations incorporate provisions to protect views of and from Culver City Park and Blair Hills. These regulations include:

- restrictions on tank locations;
- restrictions on the number of drill rigs;
- a 400-foot setback for drilling activities;
- limitation on the number of wells to be drilled on an annual basis and at any one time;
- restrictions on well stimulation within the 400-foot drilling buffer from Developed Areas;
- landscaping and painting requirements;

In addition, the Specific Plan Drilling Regulations incorporate several requirements to maintain the nature hillside character along the north edge within the 400-foot setback/buffer. These include, but are not limited to:

- revegetation of areas disturbed during an oil spill or clean-up activities;
- preparation of a Special Status Species and Habitat Protection Plan;
- compliance with U.S. Fish and Wildlife and California Department of Fish and Wildlife rules and regulations for listed plant or wildlife species; and
- habitat restoration in sensitive natural habitat areas disturbed by drilling activities.

3.7 ENVIRONMENTAL MANAGEMENT AND SUSTAINABILITY PLAN

3.7.1 Relevant General Plan Policy

The following General Plan policies influence the Environmental Management Plan for the City IOF Specific Plan:

CNE One means by which the conservation goals can be achieved is through pollution prevention and control.

NE Objective 1. Land Use Compatibility. Ensure the compatibility of adjacent land uses with regard to noise sources and receptors.

NE Policy 1.A: Ensure the consistent application of adopted noise standards and criteria in the review of all discretionary land use decisions.

NE Policy 1.B: Reexamine the City's noise regulations Ordinance on a regular basis to ensure its effectiveness.

NE Objective 1.D: Investigate the opportunity to construct barriers to mitigate sound emissions where necessary and where feasible.

NE Policy 1.E: Identify mediation techniques to help neighbors resolve their differences and be more considerate of the effects of noise.

NE Objective 2. Stationary Noise Sources. Protect those areas that are or may be subject to unacceptable noise from stationary noise sources.

NE Policy 2.A: Create a comprehensive ordinance establishing noise regulation criteria, and noise standards for noise sources and receptors to include but not be limited to the following:

- *Standards for temporary and “event” noise sources, such as carnivals and entertainment productions.*
- *Noise reduction features during site planning to mitigate anticipated noise impacts on affected noise sensitive land uses, such as schools, hospitals, convalescent homes, and libraries.*
- *State Uniform Building Code (UBC) standards for interior community noise levels applied to single-family dwellings.*
- *Standards for mechanical equipment such as fans, air conditioners, compressors, and exhaust vents.*
- *Temporary sound barrier installation at construction sites if construction noise is impacting nearby noise sensitive land uses.*
- *Noise abatement and acoustical design criteria for construction and operation of any new developments.*

NE Policy 2.B. Require addition of noise reduction features to all existing and proposed stationary-related noise sources which exceed established noise standards to reduce impacts on noise sensitive land uses.

NE Policy 2.D: Pro-actively enforce noise amplification laws concerning nuisances such as car radios, garage bands, boom boxes, and car alarms.

NE Objective 3. Transportation-Related Noise Sources. Protect those areas that are or may be subjected to unacceptable noise from transportation noise sources.

NE Policy 3.F. Limit truck movements to those arterials designed to handle the traffic, and those located farther from noise sensitive areas.

3.7.2 Development Concept and Plan Features

♦ 3.7.2.1 Natural Resources Protection

As discussed under the Landforms, Visual Resources and Viewshed Management Plan, this Specific Plan establishes a Development Plan that considers the City IOF in a comprehensive manner to balance the protection of natural resources with the continuation of oil-related uses in the City IOF. The Development Concept promotes consolidation of City IOF facilities within a centralized core (i.e., allowed development area) while preserving natural areas and steep slopes as open space. Combined with the rigorous requirements of the Drilling Regulations, new oil-related development within the City IOF property will be constructed, managed and maintained to preserve important views, topographic and other natural features, and the semi-rural character of the City's hillsides. To the extent feasible, the standards supported by this Specific Plan preserve ridgelines, natural slopes, knolls, ravines and prominent landforms in their natural state, to the maximum extent feasible, and to protect important views and topographic and other natural features.

♦ 3.7.2.2 Conservation and Sustainability

The City IOF Specific Plan seeks to ensure that new oil-related development is designed and constructed in an environmentally sensitive and sustainable manner and protects the public health, safety and welfare, and the environment of persons and property within the City of Culver City and surrounding communities. Consistent with City of Culver City policies, the Specific Plan encourages and requires various water and energy conservation measures for City IOF development and operation. To the extent feasible and practical, development within the Specific Plan area will incorporate a range of conservation measures to reduce energy consumption and thereby promote sustainability and reduction of greenhouse gas emissions, and conserve water use.

The Specific Plan and measures recommended in the EIR encourage the installation of water-efficient landscaping and irrigation, including: (1) planting drought-tolerant and native species; (2) covering exposed dirt with moisture-retaining mulch; (3) installing water-efficient irrigation systems and devices, including advanced technology such as moisture-sensing irrigation controls; and (4) utilizing reclaimed water, if feasible.

The City review process for all aspects of the continuing oil-related uses helps to ensure that new development is designed and constructed in an environmentally sustainable and sensitive manner and protects the safety of persons and property

♦ 3.7.2.3 Pollution Prevention and Control

Consistent with conservation goals of the General Plan, the Specific Plan and Drilling Regulations place a strong emphasis on pollution prevention and control.

The EIR prepared for the City IOF Specific Plan evaluated a range of environmental issues and identifies a comprehensive mitigation program that includes minimizing pollutants that could be generated due to the continuation of oil-related uses under this Specific Plan.

The mitigation program, set forth through the Mitigation Monitoring and Reporting Program (MMRP) provides for the following concepts that function to minimize and control pollution, emissions and environmental effects:

- Reduce air pollution and GHG emissions through new emission control technologies, increased energy efficiency, and use of renewable energy.
- Reduce air pollution and GHG emissions through energy conservation.
- Reduce air pollution and GHG emissions through waste reduction, diversion of solid waste from landfill operations, and recycling.
- Reduce GHG emissions from activities within the City IOF boundaries to support the State's efforts under AB 32 and to mitigate the impact of climate change.
- Conduct appropriate environmental reviews for the Comprehensive Drilling Plan and subsequent Supplemental and Special Review projects, and provide for a vigilant monitoring and reporting process to ensure that new development and ongoing operations perform to the required standards and criteria, thus minimizing the affect to surrounding land uses and protective of the public health, safety and welfare, and the environment.
- Mitigate unacceptable levels of noise, odors, pollution, dust, light, and glare that affect residential areas and other sensitive receptors.
- Coordinate public infrastructure, utilities, and services with City IOF uses.
- Ensure that new drilling projects are designed to preserve and protect the watershed in and near the City from pollutants, excessive changes in natural drainage courses, wildfires, and other natural or human-made detrimental effects on the watershed system.
- Develop best management practices for water quality and watershed enhancements and encourage their implementation voluntarily and through review of development applications.
- Require development projects to conform to the regulations of the NPDES permits.
- Develop methods and measures to mitigate excessive non-transportation noise.
- Require new development to minimize noise impacts on adjacent uses through site and building design, setbacks, berms, landscaping, and/or other noise abatement techniques.
- Require that an acoustical analysis be prepared by a qualified acoustical engineer, and provide a Quiet Mode Drilling Plan, to ensure that noise thresholds are attenuated below threshold levels.
- Reduce the amount of fugitive dust emitted into the atmosphere.
- Preserve biological resources, including vegetative communities and wildlife and its habitat, subject to the safety of residents and property.
- Require drilling proposals in areas expected to contain important vegetation and wildlife communities to conduct biological assessments and mitigate impacts, as appropriate.
- In areas that are adjacent to sensitive vegetation and/or wildlife communities and/or open spaces, require new development to employ site design techniques that provide buffers between the development and the biological resources and to landscape their sites with vegetation that is consistent with the adjacent resources, in balance with "fire safe" considerations.

- Require approval of preliminary hydrology reports prior to approval of proposed drilling projects within hillside areas where necessary in order to ensure safe development.
- Encourage implementation of wildfire mitigation activities in a manner consistent with the goal of promoting sustainable ecological management.
- Require stabilization of land disturbed as a result of construction projects, including short-term methods during construction (e.g., watering active construction areas, covering open stockpiles, applying non-toxic soil stabilizers on unpaved access roads and temporary parking areas) and permanent methods post-construction (e.g., vegetation or revegetation, installation of hardscape, etc.).

3.7.3 Implementation Program

Environmental Management and Sustainability objectives of this Specific Plan will be implemented through the Drilling Regulations (see Appendix C); the Specific Plan Reporting and Monitoring Program (see Chapter 5.0 and Appendix D); and the adopted EIR MMRP.

3.8 SEQUENCING PLAN

This Specific Plan establishes a 15-year timeframe, assumed to range from 2018 through 2032, during which new drilling or redrilling of existing wells may occur. However, once the maximum cap of 30 new wells has been met, no further drilling would be allowed, even if the end of the plan period has not been reached. Oil and gas production and operations associated with permitted wells established prior to and under this Specific Plan, could continue beyond the 15-year drilling period as specified in this Specific Plan and/or established through conditions of the approved Drilling Plan(s) and Drilling Use Permit(s).

Specific Plan new (or redrilled) well development is anticipated to be implemented in increments of zero to three wells per year, as determined by the approved Annual Consolidation and Drilling Plan.

The Oil Field Operator would have flexibility in determining which wells would be drilled or redrilled and according to what schedule. It is assumed the Oil Field Operator would choose to implement the maximum number of allowed wells at any given time, thus it is possible that the maximum total of 30 new/redrilled could be accomplished by as quickly as 2028.

Ultimately, the approved Comprehensive Drilling Plan and each subsequent Annual Consolidation and Drilling Plan will determine the sequencing of development under this Specific Plan.

3.9 CONSTRUCTION MANAGEMENT PLAN

Prior to the issuance of any grading or building permit and consistent with City of Culver City standard practice, a Construction Management Plan would be prepared and submitted to the Culver City Community Development Director and Director of Public Works/City Engineer for review and approval. The Construction Management Plan, at a minimum, should address the following:

- A minimum of fifty percent (50%) of the construction waste would be recycled;
- All parking related to construction would be accommodated on site (i.e., within the boundary of the City IOF and no on-street parking) or at an approved off-site construction staging/employee parking area (as established in an approved Construction Management Plan);
- Haul routes and delivery schedules shall be identified;
- Location of construction equipment and materials storage shall be identified on-site; and
- A restoration plan for restoring and revegetating all areas disturbed during construction activity.

The Construction Management Plan will require that a minimum of 50 percent of the debris or material generated during demolition and/or construction shall be diverted from a landfill. City IOF construction management program(s) should include measures for alternative non-landfill disposal, reuse or recycling of generated construction waste in order to minimize the volume of disposal of solid waste into landfills and to reduce the amount of GHG emissions associated with the transportation and disposal of solid waste into landfills.

The Construction Management Plan should include measures to control erosion and reduce sediment impacts associated with construction. Examples of measures to be incorporated into the Construction Management Plan include: (a) When construction occurs in areas not previously graded, the extent of disturbance shall be limited to the minimum needed for construction, staging, and access; (b) Topsoil removed during grading shall be stockpiled for onsite reuse during site landscaping; (c) Topsoil stockpiles shall be kept separate from other excavated materials to facilitate effective reuse and stored in a manner that minimizes erosion of the stored materials; (d) Establish reasonable limits on the clearing of vegetation from the construction zone; and (e) Incorporate best management practices (BMPs) to mitigate projected increases in pollutant loads during construction activity.

Further, the Construction Management Plan should address the management of construction vehicles on local roadways, including the use of flagmen to assist with the management of any oversized construction vehicles on public roadways.

In addition, the Construction Management Plan for each well drilling or construction project should incorporate provisions for fire safety that include proper use and storage of combustible construction materials and equipment (as set forth in the Drilling Regulations) and establishment of appropriate brush clearance in active work areas.

The Construction Management Plan should also be provided to the Los Angeles County Fire Department for review and approval.

CHAPTER 4.0

DEVELOPMENT STANDARDS AND GUIDELINES

4.1 APPLICABILITY

Implementation of the City IOF Specific Plan is accomplished through a set of development standards (i.e., the Drilling Regulations) and design guidelines as set forth herein. The development standards and guidelines described below are intended as a summary guideline of the key planning development standards that shall apply to any drilling or redrilling of wells, and all improvements, construction of structure(s) or facility(ies), and operations and maintenance of oil activities within the City IOF. The complete set of Drilling Regulations is provided in **Appendix C**.

The regulations set forth in this Chapter have been established to provide for consistent operation and orderly continuation and development of legal nonconforming oil-related uses within the City IOF Specific Plan area. The standards provide for the uses, spatial arrangement, physical parameters of development, and operation of the City IOF consistent with the intent, purpose, and goals of the City's General Plan, Culver City Municipal Code (CCMC), and the objectives of this Specific Plan. Application of these regulations is intended to: (1) provide for an appropriate use of the land; (2) create a harmonious relationship between City IOF facilities and activities, and the surrounding sensitive uses and community; and (3) protect the health, safety and welfare of the community and protect the environment.

4.1.1 General Provisions

- A. Whenever the regulations set forth in this Specific Plan differ from the regulations of the CCMC, the regulations of this Specific Plan shall take precedence. When specific regulations are not established through this Specific Plan, the provisions of the CCMC shall apply.
- B. All grading plans shall comply with the grading requirements of the City of Culver City and standards established by this Specific Plan. A preliminary geotechnical engineering report and soil engineering investigations identifying recommendations for safe and stable construction are to be submitted with all Drilling Plan and Drilling Use Permit applications. The recommendations of the engineering geologist and soils engineer shall be incorporated into the grading plan design prior to grading plan approval. The stability of the development site must be certified by the engineering geologist and soil engineer prior to the issuance of grading permits.
- C. All construction shall comply with all provisions of applicable building codes and the various mechanical, electrical, fire, energy and other codes related thereto.
- D. The Culver City General Plan land use designation of the City IOF area shall remain unchanged as "Open Space" and "Institutional" and included within the Baldwin Hills/Blair Hills Focused Special Study Area. The zone district of the City IOF Specific Plan area within the City of Culver City shall remain unchanged as "Single Family Residential (R1)," "Industrial General (IG)," and "Open Space (O)". The City IOF Specific Plan shall become an established specific plan under Zoning Code Section 17.570.030.
- E. No Temporary Use Permit, Outdoor Storage Permit, or any other similar special use permit shall be required for any oil-related uses otherwise covered and permitted through the plans and permits set forth in this Specific Plan.

- F. Any proposed site plans, agreements or any other development approvals within the City IOF, must be consistent with this Specific Plan. Oil-related uses which are found to be consistent with the Specific Plan will be deemed consistent with the City's General Plan and its adopted elements.
- G. Any well, other facility construction or physical condition on the City IOF existing prior to the adoption of this Specific Plan and that may be inconsistent with the development standards and development guidelines established in this Specific Plan (including the Drilling Regulations), shall be allowed to continue as a legal nonconforming condition consistent with the provisions of Zoning Code Section 17.610.010.D.
- H. All existing exterior lighting and signage within the City IOF prior to approval of this Specific Plan shall be brought into compliance with the provision of this Specific Plan in a timely manner following approval of the Comprehensive Drilling Plan.

4.1.2 Purpose and Intent

The purpose and intent of this Specific Plan are set forth in Chapters 1 and 3 of this Specific Plan, as well as Section 1 of the Drilling Regulations. When adopted, this Specific Plan will define oil uses as a continuing legal nonconforming use within the City IOF, which will be regulated by the City IOF Specific Plan and related Drilling Regulations.

4.2 ALLOWED LAND USES

When adopted, this Specific Plan will define oil uses as a continuing legal nonconforming use within the City IOF, which will be regulated by the City IOF Specific Plan and related Drilling Regulations.

4.2.1 Definitions

Terms, definitions and acronyms relevant to the clarification of allowed uses, and the interpretation and administration of this Specific Plan, are set forth in Sections 2A (Acronyms) and 2B (Definitions) of the Drilling Regulations.

4.2.2 Permitted Uses

Drilling and redrilling activity is allowed for a 15-year drilling period under the Specific Plan, and subject to the limitations identified in Section 4.2.3 (below). At the end of the 15-year drilling period under the Specific Plan, no additional wells could be drilled or redrilled. However, reworking of existing wells and other related operational and maintenance activities would be allowed to continue in accordance with the provisions of this Specific Plan prior to abandonment.

Well reworking, maintenance and potential well stimulation are allowed when conducted in accordance with Sections 32 (Well Stimulation Treatments) and 33 (Well Reworking) of the Drilling Regulations.

Construction activities shall be limited to those necessary for new production and injection wells and associated equipment (tanks, pipes, piping components, etc.) that are needed to support access to such wells and equipment, or as needed for emergency construction activities, such as repairs after earthquakes, floods, or landslides or other catastrophic events.

Processing at the well site is limited to the dehydration of crude oil and gas produced from the well, the storage, handling, recycling, and transportation of such materials, and those processing operations required for water injection purposes. Other oil-related uses are allowed only to the extent that they are necessary to support the drilling/redrilling of wells and the oil and gas production and operations directly associated with those wells.

Other minor ground disturbing activities and minor structures, as may be required to achieve the monitoring, reporting and restoration requirements under this Specific Plan (including the Drilling Regulations) and the adopted MMRP (i.e., groundwater monitoring wells, habitat restoration, fuel modification zone management, and similar activities) are allowed.

Permitted uses are as set forth in Sections 1 through 57 of the Drilling Regulations.

4.2.3 Prohibited Uses

Sumps and Major Facilities (as defined in Section 2.B of the Drilling Regulations) are prohibited within the City IOF. Processing operations beyond those allowed per Section 34 (Processing) and as defined in Section 2.B, are generally prohibited unless required by DOGGR.

Prohibited oil-related activities and structures are as set forth in Sections 13 (Sumps Prohibited) and 14 (Major Facilities Prohibited) of the Drilling Regulations.

4.2.4 Operational Regulations and Limitations

The following operational regulations and limitations shall apply.

♦ 4.2.4.1 Cap on Maximum Number of Wells Allowed

The maximum number of wells proposed to be drilled or redrilled under the Specific Plan shall not exceed a total of 30 wells. The maximum number of wells allowed to be drilled or redrilled within the City IOF is as set forth in Section 4 (Application Filing, Processing, Review, Drilling Plan Amendment and Fees) of the Drilling Regulations.

♦ 4.2.4.2 Cap on Maximum Annual Drilling Operations

The maximum number of wells to be drilled or redrilled on an annual basis, which shall be no more than two wells per year for the first two years; if in any year thereafter, the Community Development Director determines that the Specific Plan and these Drilling Regulations are sufficiently protective of the public health, safety and welfare, and the environment, then three wells per year may be drilled, until such time that the Community Development Director determines otherwise or the maximum number of allowed new or redrilled wells is reached. No more than one drilling or redrilling rig may be erected at any one time. Also, no more than two rigs used for reworking shall be present within the Oil Field at any one time, unless an emergency condition requires additional rigs.

The maximum number of wells allowed to be drilled or redrilled in any calendar year within the City IOF is as set forth in Sections 31.B (Consolidation and Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan) and 33 (Well Reworking) of the Drilling Regulations.

♦ 4.2.4.3 ***Limitations on 24-Hour Operations***

With the exception of emergencies, well reworking operations shall not be allowed during nighttime hours. Drilling, redrilling or other operations within the City IOF that occur outside of standard operational hours (per Section 4.2.4.4 below) shall be limited as set forth in Sections 22 (Noise Attenuation) and 33 (Well Reworking) of the Drilling Regulations.

♦ 4.2.4.4 ***Hours of Operations for Non-Drilling Activities***

Except as provided in Section 4.2.4.3 (above), the allowed hours of operations for non-drilling activities and non-emergency work within the City IOF shall be as set forth in Sections 22 (Noise Attenuation) and 33 (Well Reworking) of the Drilling Regulations.

♦ 4.2.3.5 ***Emergency Response and Emergency Activities***

Emergency response and emergency activities within the City IOF shall be in accordance with the provisions as set forth in Sections 12 (Fire Operational Permit, Protection and Emergency Response), 53 (Compliance and Safety Audits) and 54 (Complaints) of the Drilling Regulations

4.3 SITE PLANNING

The following site planning and spatial placement regulations shall apply.

4.3.1 Specific Plan Area and City IOF

The Specific Plan area is defined as the entirety of eight parcels within the city limit of Culver City and four small polygons within three adjacent parcels that comprise the City IOF, and totaling approximately 77.8 acres in the City of Culver City, that are subject to active oil and gas production. The Specific Plan area, and the boundary within which the Drilling Regulations apply is provided in **Appendix A** (Boundary Description) of this Specific Plan.

4.3.2 Drilling and Redrilling Areas

♦ 4.3.2.1 ***Allowed Drilling and Redrilling Areas***

Drilling and redrilling is allowed in any area where the Top Hole well location is setback at least 400 feet from the edge of the Developed Area (as defined in Section 2.B of the Drilling Regulations), and setback at least 75 feet from the edge of a public road, when a Drilling Use Permit has been obtained from the City of Culver City (and DOGGR). The Allowed Drilling Areas within the City IOF is as set forth in Section 21.J (Drilling and Redrilling Setbacks) of the Drilling Regulations.

♦ 4.3.2.2 ***Drilling and Redrilling Activities Subject to Special Approval Areas***

Drilling and redrilling within the City IOF may be permitted outside of the Allowed Drilling area (i.e., any area that is less than 400 feet setback from the edge of the Developed Area) only when subject to the special discretion and approval of the City Council, if it can be determined the setback reduction will not be detrimental to the public health, safety or welfare, or the environment. The Drilling and Redrilling Activities Subject to Special Approval Areas within the City IOF is as set forth in Section 21.J (Drilling and Redrilling Setbacks) of the Drilling Regulations.

◆ 4.3.2.3 *Slant Drilling and Redrilling Areas for Deep-Zone and Mid-Zone Wells*

The drilling of all new wells or redrilling of all existing wells for which the bottom-hole location extends either below 3,500 feet or 8,000 feet below ground surface (bgs), shall employ slant drilling whenever feasible to do so in order to locate the well top hole as far from the Sensitive Developed Area (as defined in Section 2.B of the Drilling Regulations) edge as may be reasonably necessary to mitigate impacts. When the top-hole location of any Deep-Zone or Mid-Zone well (as defined in Section 2.B of the Drilling Regulations) is closer than 800 feet to the edge of any Sensitive Developed Area, the well drilling program shall require Supplemental review and approval to consider special conditions to minimize the potential effects to uses and occupants within the adjacent Sensitive Developed Areas.

The requirement for slant drilling and mid-zone and deep-zone drilling and redrilling activities within the City IOF, as well as the Supplemental review requirements are set forth in Sections 21.J (Drilling and Redrilling Setbacks) and 31.C (Deep-Zone and Mid-Zone Supplements) of the Drilling Regulations. Reporting requirements for slant (i.e., directional) drilling are set forth in Section 42 (Directional Drilling Surveys Required on Certain Wells) of the Drilling Regulations.

4.3.3 Tanks

No new storage tank shall be constructed closer than 500 feet from any Developed Area (as defined in Section 2.B of the Drilling Regulations), or closer than 200 feet from a public road. New tanks shall be located such that they are not visible from residences, parks or other public areas and shall not be placed on ridgelines, unless the tank can be fully screened through the use of mature landscaping in accordance with an approved Landscaping Plan (Section 37.A of the Drilling Regulations) and the adopted MMRP. In addition, tanks shall not be constructed across an active fault or within the Alquist-Priolo Earthquake Fault Zone without preparation and approval of a Fault Investigation Report. Standards for the placement, sizing and maintenance of tanks within the City IOF are set forth in Sections 16 (Location of Tanks) and 24.F (Fault Investigation Report) of the Drilling Regulations.

4.3.4 Spacing Between Structures and Activities

No building or structure shall be constructed within 50 feet of any oil storage tank. Standards for the placement of facilities in proximity to other structures within the City IOF are set forth in Section 16 (Location of Tanks) of the Drilling Regulations.

4.4 BUILDING STANDARDS

4.4.1 Compliance with Uniform Building, Mechanical and Fire Codes

All construction, operations and maintenance within the City IOF shall be in accordance with the California Building Code and California Fire Code, consistent with provisions as set forth in Sections 12 (Fire Operational Permit, Protection and Emergency Response), 15 (Tanks), 16 (Location of Tanks) and 17 (Piping and Electrical Equipment) of the Drilling Regulations.

4.4.2 Compliance with DOGGR and Regulatory Agencies Requirements

All operations, equipment, monitoring procedures, and permitting and reporting requirements for activities conducted within the City IOF shall be in compliance with all federal, state, county and local regulations, including, but not limited to, those of DOGGR, SCAQMD, OSHA and RWQCB. At a minimum, activities within the City IOF shall be in accordance with the provisions as set

forth in Sections 12 (Fire Operational Permit, Protection and Emergency Response), 15 (Tanks), 16 (Location of Tanks), 17 (Piping and Electrical Equipment), 29.G (Jurisdictional Resources), 41.B (Fencing), 46 (Idle Well Testing and Maintenance), and 51 (Oil Field Abandonment Procedures) of the Drilling Regulations.

4.4.3 On-Site Access Roads and Public Roadways

On-site access roads within the City IOF shall be constructed and maintained in accordance with the provisions as set forth in Sections 21.F (Fugitive Dust Control Plan), 24.H (Erosion Control Plan), and 38 (Public Roadways and Private Road Construction) of the Drilling Regulations. Truck and delivery vehicles utilize public roadways shall be in accordance with the provisions set forth in Section 38 (Public Roadways and Private Road Construction) of the Drilling Regulations.

4.5 LANDSCAPING, LIGHTING AND SIGNAGE STANDARDS

4.5.1 Landscaping Requirements

Landscaping within the City IOF, whether for visual screening, revegetation, site restoration, or perimeter landscaping, shall be in accordance with the provisions as set forth in Sections 16 (Location of Tanks), 21.K (Fugitive Dust Control Plan), 29.B (Special Status Species and Habitat Protection Plan), 31 (Consolidation and Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan), 37 (Landscaping), Section 40.A (Abandoned and Unused Equipment Removal Plan), and Section 49.D (Well Pad Revegetation) of the Drilling Regulations.

4.5.2 Lighting Requirements

Exterior lighting within the City IOF, including temporary lighting during periodic nighttime drilling and redrilling activities, shall provide for safety and security, without excessive lighting or glare. All exterior site lighting shall be oriented away from public rights-of-way and adjacent properties in order to minimize potential for nuisance glare. Outdoor lighting and security lighting shall be designed and implemented within the City IOF shall be in accordance with the provisions as set forth in Sections 29.D (Biological Resources, Monitoring) and 36 (Lighting) of the Drilling Regulations.

4.5.3 Signage Requirements

Signs within the City IOF shall be in accordance with the provisions as set forth in Sections 21.B (Air Quality, Public Health and Climate Change, Odor Minimization Plan) and 39 (Signs) of the Drilling Regulations.

4.5.4 Fencing and Wall Requirements

Fencing and walls within the City IOF, whether for security, screening or construction enclosures, shall be in accordance with the provisions as set forth in Sections 18 (Dikes and Retaining Walls), 29 (Biological Resources), 31 (Consolidation and Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan), 37 (Landscaping), and Section 41 (Other Standards) of the Drilling Regulations.

4.6 PROPERTY MAINTENANCE AND MANAGEMENT

4.6.1 Property Maintenance of Oil Field and Oil-Related Facilities

The City IOF property and oil-related operations shall be managed in a manner that preserves and improves the visual character and appearance and should be regularly maintained in accordance with the provisions as set forth in Sections 11.E (Maintenance of Premises), 33.E (Pipelines), 37.C (Inspection and Maintenance), 39.F (No Littering Signs), 40 (Equipment Removal and Maintenance), 41.C (Storage of Equipment), 41.D (Painting), and 49.B (Well Pad Site Cleanup), of the Drilling Regulations

4.6.2 Nuisance Management and Abatement

The City IOF property and oil-related operations shall be managed in a manner to avoid potential nuisance at the surrounding area. Nuisance avoidance protocols and abatement of nuisance complaints within the City IOF shall be in accordance with the provisions as set forth in Sections 11.D (Nuisance Requirements), 21.B (Odor Minimization Plan), 21.C (Air Monitoring Plan), 22.K (Noise Monitoring and Reporting), 24.E (Ground Movement Threshold Limits), and 54 (Complaints) of the Drilling Regulations

4.7 REQUIRED PERMITS, DRILLING PLANS, MONITORING AND REPORTING

Prior to any drilling or redrilling under this Specific Plan, the Oil Field Operator shall first submit and receive approval of the required Comprehensive Drilling Plan, Annual Consolidation and Drilling Plan, and Supplement to either the Comprehensive or Annual Drilling Plans, each demonstrating consistency with the policy guidance provided in Chapter 3.0, Development Plan, of this Specific Plan. Only after approval of a Comprehensive Drilling Plan can a Drilling Use Permit(s) be obtained.

Following approval of the Drilling Plans and/or issuance of a Drilling Use Permit, as identified throughout this Specific Plan (and the Drilling Regulations in **Appendix C**), the Oil Field Operator shall periodically provide the City of Culver City with documentation demonstrating compliance with the provisions herein. These requirements are discussed and outlined in Chapter 5.0 (Implementation and Administration) of this Specific Plan, and summarized in **Appendix D**, Monitoring and Reporting Program).

CHAPTER 5.0

IMPLEMENTATION AND ADMINISTRATION

This Chapter contains the procedures for administration of the provisions included herein, including procedures for amendments if needed. Other information covered in this Chapter pertains to general administration, permitting, monitoring, reporting, amendment procedures, and the linkage between and among these elements. This Chapter also provides discussion of this Specific Plan's relationship to the General Plan, the Culver City Municipal Code (CCMC) (including Title 17, Zoning Code) and other regulatory codes, and consistency with such.

5.1 PURPOSE AND INTENT

The City IOF Specific Plan establishes standards and guidelines governing the continuation of oil-related uses, an existing legal nonconforming use within the boundary of the Specific Plan area (see **Appendix A**). All oil and gas production and operation activities within the City IOF shall be implemented in conformance with the regulations and guidance contained within this Specific Plan (and its related Drilling Regulations, as set forth in **Appendix C**).

The City of Culver City will work toward the effective and efficient implementation of the Specific Plan. Decisions with regard to permit applications and improvements within the City IOF shall be guided by this Specific Plan, including its Development Plan (i.e., land use concept, open space and recreation plan, etc.), development standards and landscaping guidelines. Specific Plan implementation will be reviewed by the Director of Community Development, the Director of Public Works, the Fire Chief and/or the City Council, as indicated below.

5.2 GENERAL PLAN CONSISTENCY

California state law requires a specific plan to be consistent with the corresponding General Plan. The Culver City General Plan land use designations the Specific Plan area are open space, industrial and focused special study use. Oil-related activity within the City IOF area, including the drilling of new wells and redrilling of existing wells, is permitted to continue as a legal nonconforming use within the current Residential Single-Family, Industrial General and Open Space zones, and the General Plan's open space, industrial and focused special study area land use designations. Adoption of the Specific Plan as a comprehensive plan for the interim oil drilling and production activities maintains the current land use relationships and establishes appropriate development standards and guidelines to ensure that continued operation of, and potential oil-related future activity within, the City IOF will remain consistent with the guiding policies of the City's General Plan. Specific General Plan policies that the City IOF Specific Plan will implement and/or facilitate are provided in **Appendix B**. Projects and/or oil-related developments which are found consistent with this Specific Plan will be deemed consistent with the City's General Plan and its adopted elements and policies.

5.3 RELATIONSHIP TO CITY ZONING CODE

The City IOF is within the Residential Single Family (R1), Industrial General (IG) and Open Space (OS) zones. Oil-related uses are not identified as allowed uses in any of the applicable underlying zones. However, in accordance with CCMC Section 17.610.010.D, "land that has been used for drilling, production, or processing of oil, gas, or other hydrocarbons, may continue in that use, regardless of the applicable zoning district," and such oil uses are deemed a legal nonconforming use. The provisions of this Specific Plan set forth the regulations under which oil-related uses may continue under as an interim nonconforming use.

With adoption and implementation of the City IOF Specific Plan, oil-related activities, including the drilling of new wells and redrilling of existing wells, will be permitted and regulated as an interim use, and allowed to continue only during such time as the legal nonconforming status remains applicable. The City IOF will retain its underlying zoning of R1, IG and OS, which function as the intended standards for any potential future non-oil related development or uses within this area. This Specific Plan regulates the continuation of oil-related uses, including a 15-year period for the drilling of new wells and the redrilling of existing wells, as set forth in this Specific Plan. Oil and gas production and operations associated with permitted wells established prior to or under this Specific Plan, could continue beyond the 15-year drilling period as specified in this Specific Plan and/or established through conditions of the approved Drilling Plan(s) and Drilling Use Permit(s).

The nature of the City IOF necessitates and justifies some deviation from certain zoning development standards that are required for more traditional non-oil-related developments or uses, especially those that are oriented to singular uses and/or primarily contained within enclosed structures. Further, the City IOF is unique in that it is an existing functional oil field, first established over 90 years ago, and because it is part of a larger urban oil field that traverses multiple jurisdictional boundaries. Additional factors are that the City IOF is located amid urban uses and it partially occupies land that has been purchased by open space and conservation entities.

This Specific Plan establishes site-specific standards that are appropriate to accommodate ongoing oil-related uses, including the drilling, production or processing of oil, gas, or other hydrocarbons, in the context of the conditions noted above, and which are not in conflict with the City of Culver City's development regulations for the underlying zone districts.

Except as specifically addressed in this Specific Plan, development and operation of the City IOF is subject to all other development standards of the CCMC. Where Specific Plan regulations differ from provisions of the CCMC, this Specific Plan supersedes those provisions. When an issue, condition or situation occurs that is not covered or provided for in this Specific Plan, the regulation(s) of the CCMC that is most applicable to the issue, condition or situation shall apply.

This Specific Plan, when adopted by ordinance, becomes the Plan that serves as the interim planning document for the City IOF and establishes the use-specific regulations for oil drilling and related oil and gas production activities within the Specific Plan area. All other City codes and ordinances shall continue to be applicable, unless expressly superseded by the terms of this Specific Plan or unless they are inconsistent with this Specific Plan, in which case they are superseded.

5.4 INTERPRETATION

The Community Development Director shall have the responsibility and authority to interpret the provisions of this Specific Plan, including the related Drilling Regulations, when there is a need for clarity in the meaning of its regulations. If there is a conflicting requirement for building standards in regards to uniform building code, the most stringent standard will prevail. All such interpretations shall be reduced to written form and permanently maintained as part of the Specific Plan record.

5.5 COMPLIANCE WITH GOVERNMENT CODE

All development, construction, operations and maintenance within the City IOF Specific Plan area shall comply with the applicable codes of all governmental agencies having jurisdiction on

such matters including, but not limited to building, mechanical, fire and electrical codes and codes pertaining to drainage, wastewater, public utilities, grading, hazardous materials, conservation and air quality. More specifically, all development, construction, operations and maintenance shall, at a minimum, comply with the provisions of the California Division of Oil, Gas and Geothermal Resources (DOGGR), the California Public Utilities Commission (CPUC), the California Energy Commission (CEC), the US Department of Occupational Safety and Health Administration (OSHA) and the South Coast Air Quality Management District (SCAQMD).

5.6 CITY IOF DEVELOPMENT PHASING

Construction of physical improvements within the City IOF, including the development of up to a maximum of 30 new wells or redrilled existing wells, is expected to be initiated as early as 2018 and carried out over an estimated 15-year period. This Specific Plan does not specify an order or schedule for buildout of project improvements. Rather, this Specific Plan requires, as an initial step toward implementation, the submittal and approval of a Comprehensive Drilling Plan, which shall establish a programmatic framework, proposed by the Oil Field Operator, for operating and managing oil field uses under the Specific Plan.

Development may occur in any order determined by the Oil Field Operator (as approved by the City) provided that: (1) the maximum cap of 30 new or redrilled wells is not exceeded; (2) no more than two wells are drilled during the first two years or three wells any year thereafter (if approved by the Community Development Director); (3) no more than one derrick is erected within the City IOF at any one time; and (4) all required provisions for safety, monitoring, reporting, restoration and any limitations identified herein are consistently met.

The planning, design and permitting of each individual well drilling (or redrilling) project shall address construction issues such as drainage, storm water management, air pollutant emissions control, noise abatement, as described in this Specific Plan (including the Drilling Regulations) and as required by the Environmental Impact Report and Mitigation Monitoring and Reporting Program (MMRP) as development mitigation.

The portion of this Specific Plan that regulates the drilling of new or redrilling of existing wells, or the development of other oil-related support facilities, as a continuing nonconforming oil use shall expire 15 years from its effective date (following adoption), unless otherwise repealed or extended (subject to City Council approval) or, if sooner, at such time that the City IOF uses cease to exist. Oil and gas production, operations and maintenance associated with permitted wells established under this Specific Plan, can continue beyond the 15-year drilling period, subject to the ongoing reporting, monitoring, inspection and training requirements set forth in the Drilling Regulations (applicable to operations and maintenance activity), and allowed to continue only during such time as the legal nonconforming status remains applicable.

5.7 CITY IOF DEVELOPMENT APPROVAL PROCESS

Administration of this Specific Plan shall be through the Comprehensive Drilling Plan, Annual Consolidation and Drilling Plan, and Drilling Use Permit application processes established under the provisions of this Specific Plan (and more specifically within the Drilling Regulations, **Appendix C**).

Development plans or requested permits to implement this Specific Plan shall be submitted to the Community Development Department to ensure that the proposed development plans comply with all provisions of this Specific Plan. Consistent with the provisions of CCMC

Sections 17.500.15 and 17.500.20, all such submittals shall be accompanied by a City-approved application form, all required and supplemental informational materials, as well as the applicable filing and other fees specified in this Specific Plan.

The initial application review process shall be as set forth in CCMC Section 17.500.25 and 17.500.30, except that due to the technical nature of each application, the Community Development Director shall have 45 days to determine completeness of the application. Under the pre-application consultation and/or initial review, the Community Development Department shall transmit the plans to the city engineer, building department, and fire chief for review, recommendations for project engineering and code compliance, and evaluation as to completeness.

When a Comprehensive Drilling Plan is submitted, plan review, consideration and approval shall be through the City Council and subject to the provisions and findings as set forth in this Specific Plan (Drilling Regulations Section 5). The Community Development Director shall have 45 days to either deem the application as complete or respond to the Applicant/Oil Field Operator in writing to identify any outstanding items or corrections needed to complete the application. Once deemed complete, a public hearing for City Council consideration of the Comprehensive Drilling Plan shall be scheduled no later than 60 days following the date that the Comprehensive Drilling Plan application is deemed complete by the Community Development Director, or otherwise within 30 days of completion of any subsequent CEQA review, whichever is later.

When either an Annual Consolidation and Drilling Plan or an application for Drilling Use Permit is submitted, plan/permit review, consideration and approval shall be through the Community Development Director, subject to the provisions and findings as set forth in this Specific Plan. The Community Development Director shall complete the review of an Annual Consolidation and Drilling Plan (and any amendments) within 45 days of receipt, and shall either approve the Annual Consolidation and Drilling Plan or provide the Oil Field Operator with a list of deficiencies. The Community Development Director shall take action on a Drilling Use Permit within 30 days of receipt of the Drilling Use Permit application or provide the Oil Field Operator with a list of deficiencies.

The Community Development Director shall review and consider Supplements to the Annual Consolidation and Drilling Plan (as required for any Deep-Zone or Mid-Zone drilling) within 45 calendar days of submission to the City. The Community Development Director shall either approve the plan or provide a list of deficiencies and/or supplemental information needed within the 45-day timeframe.

The review and action periods may be extended, as appropriate, through mutual agreement between the City and the Oil Field Operator.

A mailed notice shall be sent to all property owners and occupants within a 500 foot radius from the Specific Plan area boundary at least 21 calendar days prior to the date of either the City Council public hearing at which the Comprehensive Drilling Plan will be considered or the anticipated date of decision by the Community Development Director for an Annual Consolidation and Drilling Plan. In addition, notice shall be published in a newspaper of general circulation at least 14 days prior to the date of the City Council public hearing. The Community Development Director may provide additional notice, with content or using a distribution method as the Community Development Director determines is necessary or desirable (e.g., on the City's website, through the City's email notification system, etc.).

All Drilling Use Permits shall be reviewed and may be approved by the Community Development Director in accordance with the provisions of this Specific Plan, and consistent with the previously approved Comprehensive Drilling Plan and Annual Consolidation and Drilling Plan. No public notice of intent to issue a Drilling Use Permit is required.

Any person aggrieved by the decision of the Community Development Department (as to Plans and Permits) made pursuant to this Chapter may, in writing, appeal such decision to the City Council within the time and manner prescribed by CCMC Chapter 17.640. Appeals to the Council shall be limited to the issue of whether or not the plans conform to this Specific Plan and other applicable law.

All physical improvements, oil-related uses, activities and operations described in the Specific Plan as components of the City IOF, are authorized only to the extent as approved through the adopted Comprehensive Drilling Plan. Applications for building permits shall be in substantial conformance with the Specific Plan and other applicable City requirements and regulations.

5.8 EXEMPTIONS

The following is a list of activities, not described in the Specific Plan, that are exempted from any further review process and are by-right with no further approval required, except as required by the building codes, or by DOGGR or any other oversight agency (i.e., SCAQMD or CEC). This list is not all-inclusive and the Community Development Director may exempt other similar de minimus activities not included herein.

- A. Partial repainting for de minimus repair, touch-up maintenance or graffiti removal with substantially similar paint color.
- B. Re-landscaping of any area of City IOF, consistent with the existing landscaping and site restoration guidelines, when not associated with well drilling, well abandonment or other major development projects that otherwise require an approved landscape plan.
- C. Re-roofing or roofing repairs when using comparable materials of essentially the same color and type of the existing building or roof materials previously installed or subsequently approved.
- D. Exterior repairs or maintenance to existing buildings or structures.
- E. Internal signage and signage intended for use within the City IOF, including directional signage, safety notices and building identification signage.
- F. Any resurfacing or repairing of an existing internal roadway, driveway, parking area or work pad area.

A request to accept exempt activities shall be made to the Community Development Director in writing by the Oil Field Operator (or its designee), and shall also furnish appropriate supporting materials and explanation of the reason for the request. Qualified exempt activities shall be processed and reviewed in accordance with the City of Culver City's Zoning Clearance process (or its equivalent).

5.9 CITY IOF DEVELOPMENT PLAN MODIFICATIONS AND ADJUSTMENTS

It is recognized that minor adjustments to certain aspects of the development site planning and design during the implementation of this Specific Plan may be required. Minor project modifications and adjustments may be necessary to address current building code requirements, environmental conditions or detailed design and engineering considerations. Similarly, this Specific Plan recognizes that fixed and inflexible standards may not be an appropriate means of ensuring harmonious and environmentally superior development, due to the complexities and variability of topography, the varying degree of site visibility, the effects of local soil conditions, and other unforeseen variables. When the proposed development remains substantially consistent with the General Plan and compliant with the Comprehensive Drilling Plan and this Specific Plan, certain minor project modifications and adjustments may be accommodated without need for a formal amendment to the Specific Plan.

The Community Development Director shall have the discretion to accommodate requests for minor changes that do not materially affect the proposed use or development program represented within this Specific Plan, or subsequently approved Comprehensive Drilling Plan or Annual Consolidation and Drilling Plan. Any minor changes and conformance review to approved plans shall be consistent with the intent of CCMC Section 17.595.010 and as authorized consistent with Drilling Regulations Section 4.C. Examples of minor changes may include those that are:

- Substantially consistent with applicable provisions of the CCMC and/or Specific Plan;
- Do not involve a feature of the project or Specific Plan that was specifically mitigated, or was the basis for findings in the City IOF Specific Plan Environmental Impact Report;
- Do not involve a feature of the improvement project that was specifically conditioned and would not create a potential new adverse impact; and
- Do not expand the assumed site development area of any individual improvement well project by more than 10 percent.

Minor changes shall be requested in writing by the Oil Field Operator (or its designee), and shall also furnish appropriate supporting materials and explanation of the reason for the request. Changes may be requested either before or after construction or establishment and operation of the approved use. Requests for minor changes should be processed and documented in a manner consistent with the existing process allowed by CCMC Chapter 17.550 or Chapter 17.595, as applicable.

The purpose of the modifications and adjustments provision is to allow for reasonable flexibility in minor details of project design that do not represent a substantial change to the overall intent of the Specific Plan, thus precluding any unnecessary steps for an Amendment to accommodate minor changes. Similarly, reasonable flexibility can be accommodated for the Comprehensive Drilling Plan or Annual Consolidated and Drilling Plan without formal reconsideration.

When the scope of a minor change exceeds the guidelines described above, but remains substantially consistent with the intent of the Specific Plan and does not necessitate an Amendment to the Specific Plan, or the nature of the change is considered a major change, the Community Development Director shall defer the decision-making to the City Council.

5.10 AMENDMENTS TO THE SPECIFIC PLAN

The Community Development Director shall have the authority to make recommendations for Amendments to the Specific Plan, and the City Council shall make the final determination. An Amendment to the Specific Plan shall be required for any of the following proposals:

1. To permit establishment of a new principal use or a change of use that the Specific Plan does not authorize;
2. To permit a use or change in the Specific Plan which would result in an increase in the number of wells above the 30 maximum cap, or that would increase the annual cap of two wells per year for the first two years and up to three wells every year thereafter (until the maximum cap is reached);
3. To make changes to environmental mitigation measures which were adopted as part of the environmental clearance for the Specific Plan and which would result in new significant environmental impacts or make substantially more severe significant environmental impacts than identified in the adopted City IOF Specific Plan EIR;
4. To make changes to the outer boundary of the Specific Plan area or the boundary extent of the Developed Area or the required setback/buffer distance;
5. To modify or extend the time limits of the Specific Plan, including time limits for required monitoring and reporting (except as otherwise expressly allowed under the approved Drilling Regulations), as well as the expiration period of the Specific Plan;
6. Any request which causes an inconsistency between the General Plan and the Specific Plan; or
7. Other significant policy changes or modifications to Specific Plan regulations which affect the entire Specific Plan area, as determined by the Director.

Specific plan amendments are governed by Government Code Section 65453. All requests for Specific Plan Amendments shall adhere to all submittal, review and approval requirements established by the City of Culver City as set forth in CCMC Section 17.570.020.

In making recommendations relative to a proposed Specific Plan Amendment, the following principles shall be considered:

1. Modified conditions, either within the City IOF or adjacent community uses, warrant a revision to the Specific Plan;
2. The proposed modification is appropriate for the proposed location or use within the City IOF;
3. The proposed modification does not detrimentally affect the interest of public health, safety and general welfare and is in conformance with standard zoning, planning, safety, health and public welfare practices; and
4. The proposed modification does not cause an inconsistency with the General Plan.

In making a decision to adopt an Amendment to the Specific Plan, the City Council shall make a finding that the proposed Specific Plan, as amended, is consistent with the objectives, policies, general land uses, and programs of the General Plan and other adopted goals and policies of the City.

5.11 PERIODIC REVIEW, REPORTING AND MONITORING

Prior to any drilling or redrilling under this Specific Plan, the Oil Field Operator shall first submit and receive approval of the required Comprehensive Drilling Plan, Annual Consolidation and Drilling Plan, and Supplement to either the Comprehensive or Annual Drilling Plans, each demonstrating consistency with the policy guidance provided in Chapter 3.0, Development Plan, of this Specific Plan. Only after approval of the Drilling Plans can a Drilling Use Permit(s) be obtained. The Operator shall obtain approval of the following:

1. Comprehensive Drilling Plan. Once, prior to the issuance of any Drilling Use Permit, for review and approval by the City Council. The Comprehensive Drilling Plan shall be filed by each Operator and shall address all proposed drilling/redrilling activity anticipated during the Specific Plan's 15-year drilling period. The Comprehensive Drilling Plan shall document existing conditions, including a surface survey of wellheads, and provide a description of the location, type and size of projected future well sites. [See Drilling Regulations, Sections 3.A and 4.A]
2. Annual Consolidation and Drilling Plan. Annually, following approval of the Comprehensive Drilling Plan, prior to the end of the calendar year for which the upcoming Annual Plan year pertains, the Oil Field Operator shall submit to the Community Development Director an Annual Consolidation and Drilling Plan, accompanied by the applicable application and fees, for review and approval of the Annual Consolidation and Drilling Plan, which shall clearly document and demonstrate that: 1) the City IOF activities are in compliance with the total maximum and annual maximum well drilling/redrilling cap set forth in the Specific Plan; 2) the proposed City IOF activities proposed in the Plan year are coordinated to ensure that the maximum number of drilling or reworking rigs will not be exceeded per the provisions set forth in the Specific Plan; 3) the proposed City IOF activities are coordinated to ensure that the air pollutant criteria thresholds will not be exceeded in compliance with Mitigation Measure MM AQ-3 per the MMRP; 4) any anticipated well abandonments are programmed into the Annual Plan; 5) proposed well drilling operations reflect reasonable effort toward consolidation of well drilling operations within the City IOF in order to reduce impacts to surrounding land uses; 6) all required periodic evaluations and updates of operational procedures and technologies (e.g., annual Clean Technology Assessment, annual Quiet Mode Drilling Plan, etc.) have been completed as set forth in the Specific Plan; and 7) the status and data of each operational or potentially operational well is updated to reflect the current annual condition for both the previous year and upcoming year. [See Drilling Regulations, Sections 3.B, 4.A, and 31]
3. Deep-Zone and Mid-Zone Supplement to the Annual Consolidation and Drilling Plan. Required as needed for drilling of wells having bottom hole locations within the mid or deep-zone strata. [See Drilling Regulations, Section 21.J.2]
4. Drilling Use Permit. Required as needed to permit the drilling or redrilling of one or more individual wells. [See Drilling Regulations, Sections 3.C and 4.A]

Following approval of the Drilling Plans and/or issuance of a Drilling Use Permit, as identified throughout this Specific Plan (and the Drilling Regulations in **Appendix C**), the Oil Field Operator shall periodically provide the City of Culver City with documentation demonstrating compliance with the provisions herein. Specifically, the Oil Field Operator shall provide the following monitoring, reporting, and restorative programs at the level of detail and frequency identified in the Drilling Regulations (and summarized in **Appendix D**, Monitoring and Reporting Program):

- Condition Compliance Plan [See Drilling Regulations, Section 7.A]
- Clean Technology Assessment [See Drilling Regulations, Section 11.B]
- Emergency Response Plan [See Drilling Regulations, Section 12.G]
- Leak Detection and Control Plan [See Drilling Regulations, Section 15.F]
- Pipeline Management Plan [See Drilling Regulations, Section 17.A]
- Emissions Offsets (or RECLAIM Credits) Program [See Drilling Regulations, Section 21.A]
- Odor Minimization Plan [See Drilling Regulations, Section 21.B]
- Air Monitoring Plan [See Drilling Regulations, Section 21.C]
- Fugitive Dust Control Plan [See Drilling Regulations, Section 21.K]
- Quiet Mode Drilling Plan [See Drilling Regulations, Section 22.C]
- Geotechnical Investigation [See Drilling Regulations, Section 24.B]
- Accumulated Ground Movement Plan [See Drilling Regulations, Section 24.C]
- Accumulated Ground Movement Survey [See Drilling Regulations, Section 24.D]
- Fault Investigation Report [See Drilling Regulations, Section 24.F]
- Seismic Activity Tracking [See Drilling Regulations, Section 24.G]
- Erosion Control Plan [See Drilling Regulations, Section 24.H]
- Groundwater Monitoring Program for the Drilling Project Site or Oil Field [See Drilling Regulations, Section 25]
- Surface Water Management Plan [See Drilling Regulations, Section 26.A]
- Stormwater Pollution Prevention Plan (SWPPP) [See Drilling Regulations, Section 27.A]
- Spill Prevention, Control, and Countermeasure Plan (SPCCP) [See Drilling Regulations, Section 27.B]
- Hydrologic Analysis [See Drilling Regulations, Section 27.A]
- Recycling and Removal Plan [See Drilling Regulations, Section 28.C]
- Special Status Species and Habitat Protection Plan [See Drilling Regulations, Section 29.B]
- Cultural Resources Assessment [See Drilling Regulations, Section 30.B]
- Active Pipeline Plot Plan [See Drilling Regulations, Section 34.F]
- Transportation Risk Management and Prevention Plan [See Drilling Regulations, Section 34.I]
- Lighting Plan [See Drilling Regulations, Section 36.B]
- Landscaping Plan [See Drilling Regulations, Section 37.A]
- Private Road Construction Plan [See Drilling Regulations, Section 38.B]
- Abandoned and Unused Equipment Removal Plan [See Drilling Regulations, Section 40.A]
- Directional Drilling Surveys [See Drilling Regulations, Section 42]

- Abandoned Well Testing Procedure [See Drilling Regulations, Section 48]
- Abandonment Plan [See Drilling Regulations, Section 51]
- Safety Inspection, Maintenance, and Quality Assurance Plan (SIMQAP) [See Drilling Regulations, Section 52.A]

The final format and requested detail of each Report shall be as determined by the Community Development Director. Once finalized, these Reports shall be made available for review to any member of the public upon request directed to either the City, or the Administrative Office of the Oil Field Operator.

The schedule and frequency of each Report, Monitoring Program, Training or Inspections, shall be as identified in the Drilling Regulations (and summarized in **Appendix D**, Monitoring and Reporting Program). However, a later date may be approved for good cause shown, as determined and approved by the City of Culver City. In the context of this Specific Plan and the Drilling Regulations, a determination of good cause requires the Oil Field Operator to meet the burden of proof to provide substantial evidence that the asserted basis for a requested extension or minor deviation from any specific deadline, reporting, monitoring or other requirement as set forth in the Drilling Regulations, constitutes an adequate justification for the requested extension and is necessary in order to achieve full compliance with the applicable provision. In part, that burden of proof shall include an explanation of the good faith effort that has been expended toward fulfilling the applicable provision in a timely manner, and shall also include a proposed revised date certain for compliance. Upon determination that the Oil Field Operator has made a good faith effort to comply, the Community Development Director (or Public Works Director, Fire Chief or other City designee, as appropriate) may extend the time or reporting provisions as appropriate. Whenever an extension is requested, the Director shall notify the Council of such request prior to acting upon same.

5.12 PROJECT FINANCING

Any and all development associated with the City IOF Specific Plan, including fair-share costs for related off-site improvements and service connections (if any) to accommodate the proposed development, shall be privately financed by the Oil Field Operator.

5.13 NOTIFICATION(S)

Notices of public hearings and decisions shall be made in accordance with the noticing requirements identified in this Specific Plan and/or the CCMC (as applicable).

5.14 MAINTENANCE AND OPERATION

All improvements within the Specific Plan boundary shall be constructed to standards acceptable to the City of Culver City and as specified in this Specific Plan. The Oil Field Operator shall be responsible for maintenance of the Specific Plan area unless otherwise determined by the City of Culver City.

APPENDIX A BOUNDARY DESCRIPTION

SPECIFIC PLAN BOUNDARY DESCRIPTION

The parcels or portions thereof listed in Table A-1, City IOF Specific Plan Area Parcels and Portions, comprise the City IOF Specific Plan area.

Table A-1: City IOF Specific Plan Area Parcels and Portions

Assessor Parcel Number (APN)	Acreage (approximate)	Specific Plan Reference Area
A. a portion of APN 4204-003-901 comprising an irregularly-shaped polygon (approximately 70' x 150'), located in the southern portion of the parcel and just south of Duquesne Avenue, and comprising the area surrounding oil wells Block 23 and Block 31	0.22	Area 2
B. a portion of APN 4204-003-901 comprising an irregularly-shaped polygon (approximately 100' x 225'), located at the southern tip of the parcel, south of Duquesne Avenue, and comprising the area surrounding oil wells Block 26, Block 29 and Block 30	0.52	Area 3
C. all of APN 4204-014-013	1.98	Area 1
D. all of APN 4204-014-015	18.28	Area 1
E. all of APN 4204-014-018	1.18	Area 1
F. all of APN 4204-014-905	1.00	Area 1
G. all of APN 4204-014-907	10.18	Area 1
H. all of APN 4204-017-006	35.50	Area 1
I. a portion of APN 4296-001-008 comprising a square polygon (approximately 60' x 60'), located approximately 215 linear feet southeast of Jefferson Boulevard and abutting the northeast corner of APN 4296-001-270, and comprising the area surrounding oil well Machado 7-A	0.09	Area 4
J. a portion of APN 4296-001-009 comprising a rectangular polygon (approximate 100' x 110') that is coincident with the east end of the parcel, and comprising the area surrounding oil well Machado 1	0.25	Area 1
K. all of APN 4296-001-270	4.62	Area 4
L. all of APN 4296-001-905	4.13	Area 4
TOTAL^a	77.75	
a) The overall total may be slightly different than the plan area total due to rounding of the values for the individual parcel areas.		

Exhibit A-1, City IOF Specific Plan Parcel Components Key Map, indicates the location of each full or partial parcel (or parcel component) as referenced in the above Table A-1 and as identified for each part of the boundary description provided below. Exhibit A-1 is located at the end of this appendix.

DESCRIPTION BY PLAN PARCEL COMPONENT

Real property in the city of Culver City, County of Los Angeles, State of California, described as follows:

PARCEL COMPONENT A:

A 0.22 ACRE PORTION^A OF: *TR=TRACTS OF LAND NO. 1 AND 2 OF THE ALLOTMENT OF ANDRES, JOSE ANTONIO, RAFAEL AND CRISTOBAL MACHADO IN THE RANCHO LA

BALLONA*LOT COM S 29>50'20". SEE ASSESSOR MAPBOOK FOR MISSING PORTION
CRISTOBAL MACHADO 86.88 AC ALLOT
APN: 4204-003-901

- A) A portion of APN 4204-003-901 comprising an irregularly-shaped polygon (approximately 70' x 150'), located in the southern portion of the parcel and just south of Duquesne Avenue, and comprising the area surrounding oil wells Block 23 and Block 31

PARCEL COMPONENT B:

A 0.52 ACRE PORTION^B OF: *TR=TRACTS OF LAND NO. 1 AND 2 OF THE ALLOTMENT OF ANDRES, JOSE ANTONIO, RAFAEL AND CRISTOBAL MACHADO IN THE RANCHO LA BALLONA*LOT COM S 29>50'20". SEE ASSESSOR MAPBOOK FOR MISSING PORTION
CRISTOBAL MACHADO 86.88 AC ALLOT
APN: 4204-003-901

- B) A portion of APN 4204-003-901 comprising an irregularly-shaped polygon (approximately 100' x 225'), located at the southern tip of the parcel, south of Duquesne Avenue, and comprising the area surrounding oil wells Block 26, Block 29 and Block 30

PARCEL COMPONENT C:

PART OF THE RANCHO LA BALLONA ALLOTTED TO THE HEIRS OF AUGUSTINA MACHADO 1.98 MORE OR LESS ACS COM S 20>30' E 1245.3 FT FROM MOST N COR OF ROMAONA S DE. SEE ASSESSOR MAPBOOK FOR MISSING PORTION RAMONA S DE MACHADO 417.330195 AC ALLOT
APN: 4204-014-013

PARCEL COMPONENT D:

MOYNIER'S TR*THAT POR W OF LA CIENEGA BLVD OF LOT9
APN: 4204-014-015

PARCEL COMPONENT E:

P M 286-13-14 LOT 2
APN: 4204-014-018

PARCEL COMPONENT F:

P M 286-13-14 AND DESC IN DOC 2415029011218 POR OF LOT 1
APN: 4204-014-905

PARCEL COMPONENT G:

P M 286-13-14 FOR DESC SEE ASSESSOR'S MAPS POR OF LOT 1
APN: 4204-014-907

PARCEL COMPONENT H:

PART OF THE RANCHO LA BALLONA ALLOTTED TO THE HEIRS OF AUGUSTINA MACHADO 35.50 ACS COM S 29>50'20" W 738.40 FT FROM MOST N COR OF ROMAONA S DE MACHADO SEE ASSESSOR MAPBOOK FOR MISSING PORTION DE MACHADO 417.330195 AC ALLOT

APN: 4204-017-006

PARCEL COMPONENT I:

A 0.25 ACRE PORTION^I OF: TRACT #3343 LOT COM AT MOST S COR OF LOT 11 TH N 31>03' E 102.745 FT TH N 51>43'13" W 1159.57 FT TH S ON E LINE JEFFERSON BLVD TO SW LINE OF SD LOT TH SE THEREON TO BEG VAC ST ADJ ON NW AND PART OF LOT 11

APN: 4296-001-008

- I) A portion of APN 4296-001-008 comprising a square polygon (approximately 60' x 60'), located approximately 215 linear feet southeast of Jefferson Boulevard and abutting the northeast corner of APN 4296-001-270, and comprising the area surrounding oil well Machado 7-A

PARCEL COMPONENT J:

A 0.25 ACRE PORTION^J OF: TRACT # 3343 LOT COM AT MOST E COR OF LOT 11 TH S 31>03' W 102.515 FT TH N 51>43'13" W TO E LINE OF JEFFERSON BLVD TH N THEREON TO NE LINE OF LOT 12 TH S 49>48' E TO BEG PART OF VAC ST AND PART OF LOTS 11 AND LOT 12

APN: 4296-001-009

- J) A portion of APN 4296-001-009 comprising a rectangular polygon (approximate 100' x 110') that is coincident with the east end of the parcel, and comprising the area surrounding oil well Machado 1

PARCEL COMPONENT K:

TR=3343 LAND DESC IN DOC 1999576, 20020826 of LOT 9

APN: 4296-001-270

PARCEL COMPONENT L:

TR=3342 FOR DESC SEE ASSESSOR'S MAPS POR of LOT 7

APN: 4296-001-905



APPENDIX B
GENERAL PLAN CONSISTENCY ANALYSIS

The following consistency analysis considers relevant and applicable goals, objectives and policies of the adopted Culver City General Plan. An applicable policy statement (i.e., objectives and policies from the General Plan) is provided in the column on the left, and the consistency determination for the Culver City Inglewood Oil Field Specific Plan and discussion is provided in the column on the right. When appropriate within the consistency discussion, references to the corresponding Drilling Regulations Section identification number is provided in parentheses. A complete set of the Drilling Regulations is incorporated as **Appendix C** of the City IOF Specific Plan. Only applicable policy statements (i.e., those relevant to oil and industrial uses, construction activity, visual and open space resources, the southeast sub-area or the Blair Hills/Baldwin Hills vicinity) are provided below. Relevant Culver City General Plan elements referenced in this Specific Plan and the table below are indicated as follows:

LUE – Land Use Element (1996, amended 2000)
OSE – Open Space Element (1994)
CNE – Conservation Element (1973)
RE – Recreation Element (1968)

CE – Circulation Element (1995)
NE – Noise Element (1995)
SSE – Seismic Safety Element (1974)
PSE – Public Safety Element (1975)

CULVER CITY GENERAL PLAN POLICY STATEMENT	CONSISTENCY DETERMINATION AND DISCUSSION
Land Use Element (LUE)	
LUE Objective 1. Neighborhood Character. Protect the low- to medium-density character of residential neighborhoods throughout the City.	Consistent. The Specific Plan Drilling Regulations incorporate numerous regulations protective of neighborhoods from environmental hazards, including but not limited to: use of clean technology (Section 11); emergency response plans (Section 12), prohibiting major facilities from being built in the Specific Plan Area (Section 14); tank leak detection and control plan (Section 15); restrictions on tank size and locations (Section 16); safety and risk of upset precautions (Section 20); restrictions on the number of drill rigs and a 400-foot drilling buffer from Developed Areas, air monitoring and odor minimization plan, (Section 21); noise restrictions (Section 22); vibration restrictions (Section 23); geotechnical evaluation and ground movement plan (Section 24); groundwater monitoring (Section 25); surface water and storm water management (Sections 26/27); hazardous materials handling (Section 28); consolidation of drilling activities (Section 31); restricts well stimulation from occurring within the 400-foot drilling buffer from Developed Areas (Section 32); restrictions on well reworking, processing operations, pipelines, and well cellars (Sections 33/34/35); and lighting and landscaping requirements to reduce visual intrusions (Sections 37/38). The Specific Plan and Drilling Regulations, combined with the mitigation program presented in the EIR, includes

CULVER CITY GENERAL PLAN POLICY STATEMENT	CONSISTENCY DETERMINATION AND DISCUSSION
	requirements that protect the public health, safety and welfare, and protect the environment.
<u>LUE Policy 1.B:</u> Protect the City's residential neighborhoods from the encroachment of incompatible land uses and environmental hazards which may have negative impacts on the quality of life (such as traffic, noise, air pollution, building scale and bulk, and visual intrusions).	<u>Consistent.</u> See Response to LUE Objective 1.
<u>LUE Policy 1.G</u> Support expansion of and access to open space opportunities in neighborhoods that currently lack neighborhood parks. (See also Open Space Element.)	<p><u>Consistent.</u> The Specific Plan is consistent with this policy because it establishes a Land Use Concept Plan and an Open Space and Recreation Plan that identify areas of privately and publicly owned open space, and targeted natural areas, that are tied to the over-arching open space and passive recreational uses both within and adjacent to the City IOF site. The Specific Plan establishes a Development Plan that considers the entire City IOF as a whole and encourages consolidation of City IOF facilities within a centralized core (i.e., allowed development area) while preserving natural areas and steep slopes as open space.</p> <p>The Specific Plan indirectly supports a concept to increase the amount and network of public and private open space, recreational facilities, and trails for active and/or passive recreation activities within the City IOF area. This is accomplished, in part, through the consolidation and setback of future oil uses to provide a perimeter (i.e., the buffer area) designated for open space and restricted from new development. This open space perimeter along the northern and western edge of the Specific Plan area functions as a critical link for the Baldwin Hills recreation corridor and the Park-to-Playa trail.</p> <p>The Specific Plan provides for the preservation and conservation of natural resources in the community. Approximately 40 acres would be designated for Natural Area open space. The Development Plan identifies areas for each category of open space.</p>
<p><u>LUE Policy 2.C</u> Investigate the potential for future housing and open space opportunities in the undeveloped areas of the City. And</p> <p><u>LUE Policy 2.D</u> Investigate the potential for future housing and open space opportunities in the unincorporated area of Los Angeles County.</p>	<u>Consistent.</u> The Specific Plan is consistent with these policies because it establishes policy and standards for the continuation of oil uses as an interim use that is not mutually exclusive of opportunities for pursuing comprehensive long-term planning goals for the Blair Hills/Baldwin Hills Focused Special Study Area. The Specific Plan establishes a Development Plan that considers the entire City IOF as a whole and encourages consolidation of City IOF facilities within a centralized core (i.e., allowed development area) while preserving natural areas and steep slopes as open space. Also, the Specific Plan Land Use Concept and

CULVER CITY GENERAL PLAN POLICY STATEMENT	CONSISTENCY DETERMINATION AND DISCUSSION
	Open Space and Conservation Plan identify areas of private and public undeveloped lands that are in the interim established as open space, which is tied to the over-arching open space and passive recreational uses both within and adjacent to the City IOF site. Although oil uses may continue within each of these areas, such uses would be interim and would not mutually exclude the concurrent benefit of open space characteristics. Generally, the Specific Plan supports the preservation and conservation of natural resources, including open space, in the community.
<u>LUE Objective 4. Neighborhood Conditions.</u> Establish and maintain quality living environments throughout the City.	<u>Consistent.</u> See Response to LUE Objective 1.
<u>LUE Policy 4.8</u> Determine appropriate standards for density, safety, and design character, consistent with existing neighborhood character.	<u>Consistent.</u> See Response to LUE Objective 1.
<u>LUE Objective 5. Economic Diversity.</u> Encourage new business opportunities that expand Culver City's economic base and serve the needs of the City's residential and business community.	<u>Consistent.</u> The Specific Plan allows for the continuation of established oil uses, including the construction of new oil and gas production facilities within an existing and secured oil field, which would support the economic base of the City's community.
<u>LUE Policy 10.F</u> Continue to require the undergrounding of utilities in all new developments and during replacement of existing service whether alone or as a part of a remodeling project, wherever feasible.	<u>Consistent.</u> The Specific Plan is consistent with this policy because the Drilling Regulations require that pipelines be buried underground or otherwise covered or screened (Section 34). The Drilling Regulations also include provisions for the screening of both non-permanent and permanent facilities throughout the City IOF.
<u>LUE Policy 10.J</u> Establish criteria for those circumstances and uses that are appropriate for non-permanent or atypical structures.	<p><u>Consistent.</u> The Specific Plan is consistent with this policy because the development standards and design guidelines in the Specific Plan and Drilling Regulations establish requirements for the placement, duration, sizing and screening of drilling and workover rigs, and other oil-related facilities, both non-permanent and permanent, which are atypical structures not suited to development standards applicable to typical structures under the CCMC.</p> <p>More specifically, the Specific Plan imposes the Drilling Regulations on oil and gas operations to protect the hillside character accompanying surrounding residential and recreational areas by providing: restrictions on tank locations (Section 16); restrictions on the number of drill rigs and requiring a 400-foot setback for drilling activities (Section 21); grading restrictions and erosion control provisions (Section 24); protection of biological resources (Section 29); limitations to the maximum number of wells to be drilled on an annual basis and at any one time (Section 31); restrictions on well stimulation within the 400-foot drilling buffer from Developed Areas (Section 32); and lighting and landscaping requirements</p>

CULVER CITY GENERAL PLAN POLICY STATEMENT	CONSISTENCY DETERMINATION AND DISCUSSION
<p>LUE Policy 11.C Support and implement the numerous policies stated throughout different sections of the General Plan that address the City's tree resources. Refer to the following Policies, and the Goals and Objectives that support tree resources:</p> <ul style="list-style-type: none">• LUE Policy 6.1: commercial corridor streetscape improvements• LUE Policy 10.A-10.E, Policy 10.H and 10.K: visual open space enhancement through street trees, streetscape amenities, and other open space policies• LUE Policy 27.C and 27.D: Southeastern Sub-Area streetscape improvements and viewshed guidelines• OSE Policy 5.A - 5.D and 5.G: visual open space enhancement through extending park-like qualities throughout the City.	<p>to reduce visual intrusions (Sections 37/38).</p> <p>See also Responses to LUE Objective 1 and LUE Policy 10.F.</p> <p>Consistent. The Specific Plan is consistent with the policy because it establishes landscape guidelines that encourage the use of trees with landscaping along the La Cienega Boulevard street corridor, and the use of trees for screening permanent oil production facilities. Much of the habitat within the City IOF has been fragmented by previous oil field operations. Native vegetation scattered throughout the City IOF area includes California sagebrush/buckwheat scrub and California sagebrush scrub. Also, there are patches of eucalyptus naturalized forest. Guidelines included in the Specific Plan for the revegetation and restoration of disturbed areas require the use of native plant species (primarily scrubs) typical and appropriate to the local hillsides.</p>
<p>LUE Objective 12. Urban Design. Ensure that new construction and renovation of existing residential and nonresidential buildings and streetscapes are accomplished with the highest quality of architectural and site design.</p>	<p>Consistent. The Specific Plan is consistent with this objective because the development standards and design guidelines in the Specific Plan and Drilling Regulations establish requirements for the placement, duration, sizing and screening of drilling and workover rigs, and other oil-related facilities, both non-permanent and permanent, that are consistent with best operational and management practices for urban drilling activity. The development concepts in the Specific Plan adapt to physical constraints by envisioning an approach under which outdated field management practices are replaced with practices that improve compatibility and safety as to the adjacent community uses. An emphasis is placed on enhancing the physical interface by minimizing the overall visual appearance of well drilling and oil production activity through setbacks, screening and landscape requirements.</p> <p>The Specific Plan imposes the Drilling Regulations on oil and gas operations to protect the hillside character accompanying surrounding residential and recreational areas through the use of site design and landscape screening requirements.</p> <p>Also, the Development Plan provides a comprehensive approach to planning of the entire City IOF property that minimizes unnecessary obstacles and promotes higher quality design, rather than a well-by-well</p>

CULVER CITY GENERAL PLAN POLICY STATEMENT	CONSISTENCY DETERMINATION AND DISCUSSION
	<p>approach that would otherwise be both inefficient and limited toward accomplishing higher quality design features. The Specific Plan facilitates preservation of key natural features and enhances the management of oil uses to better protect the public health, safety and welfare, and the environment.</p> <p>See also Response to LUE Policy 10.J.</p>
<p><u>LUE Policy 12.A</u> Support and implement the numerous policies stated throughout different sections of the General Plan that address the desired form and character of future development in the City. Refer to the following Policies, and the Goals and Objectives they support:</p> <ul style="list-style-type: none">• LUE Policy 27.A-27.D: Southeastern Sub-Area aesthetic identity, visual resources, and viewshed guidelines• OSE Policy 4.A and Policy 4.C: natural resource buffers and development guidelines• OSE Policy 5.A-5.I: visual open space and urban design improvements• OSE Policy 6.A: viewshed guidelines	<p><u>Consistent.</u> The Specific Plan is consistent with this policy because it establishes a Development Plan that considers the entire City IOF as a whole and encourages consolidation of City IOF facilities within a centralized core (i.e., allowed development area) while preserving natural areas and steep slopes as open space. Also, the Specific Plan Land Use Concept and Open Space and Conservation Plan identify areas of privately and publicly-owned undeveloped lands that are in the interim established as open space, which is tied to the over-arching open space and passive recreational uses both within and adjacent to the City IOF site. Further, the Specific Plan and Drilling Regulations establish policies and development regulations intended to protect views from within and towards the City IOF.</p> <p>The City IOF and surrounding vicinity offer panoramic views that shape the character for which the Baldwin Hills and Blair Hills area are uniquely known. The City IOF is both visible as open space within viewsheds seen from off-site, and also includes hillside areas which can provide viewing opportunities. The Specific Plan Development Plan and Drilling Regulations include development standards and design guidelines to ensure that build out of the City IOF is consistent (if not improved) with the existing character of the City IOF, and compatible with the surrounding residential community and open space resources. The Specific Plan ensures that existing scenic views from the Baldwin Hills Scenic Outlook and surrounding Baldwin Hills/Blair Hills open space area and trails are preserved and maintained.</p> <p>The Specific Plan encourages clustering of wells and facilities as one approach toward consolidation of interim oil uses in order to preserve desirable site characteristics (such as open space and views) and mitigate site challenges (such as steep slopes). New oil-related development within the City IOF property will be constructed, managed and maintained to preserve important views, topographic and other natural features, and the semi-rural character of the City's hillsides. The Drilling Regulations</p>

CULVER CITY GENERAL PLAN POLICY STATEMENT	CONSISTENCY DETERMINATION AND DISCUSSION
	<p>establish standards intended to preserve ridgelines, natural slopes, knolls, ravines and prominent landforms in their natural state, to the maximum extent feasible, and to protect important views and topographic and other natural features.</p> <p>The Drilling Regulations serve to minimize the visual impact of grading through landscaping human-made slopes to prevent erosion and soften the visual appearance of the finished slope. Also, the Specific Plan ensures that development preserves the City's natural environment, setting, and viewsheds, through sensitive siting, and construction that avoids obtrusive breaks in the natural skylines and minimizes the visual impact of grading, intrusion of highly visible cut and/or fill slopes, large unscreened permanent structures, and poorly maintained roadway surfaces.</p> <p>More specifically, the Specific Plan imposes the following Drilling Regulations on oil and gas operations to protect the hillside character accompanying surrounding residential and recreational areas by providing: restrictions on tank locations (Section 16); restrictions on the number of drill rigs and requiring a 400-foot setback for drilling activities (Section 21); grading restrictions and erosion control provisions (Section 24); protection of biological resources (Section 29); limitations to the maximum number of wells to be drilled on an annual basis and at any one time (Section 31); restrictions on well stimulation within the 400-foot drilling buffer from Developed Areas (Section 32); and lighting and landscaping requirements to reduce visual intrusions (Sections 37/38).</p> <p>Further, required setbacks and screening requirements protect major hillside views visible from points within the City from detrimental alteration by the intrusion of highly visible cuts and/or fill slopes, building lines, and/or road surfaces.</p> <p>See also Responses to LUE Policy 1.G.</p>
<p>LUE Objective 13. Open Space Protection and Acquisition. Protect and expand Culver City's open space resources through aggressively pursuing land acquisition and encouraging private contributions.</p>	<p>Consistent. The Specific Plan is consistent with this policy because it establishes a Land Use Concept and an Open Space and Conservation Plan that identify areas of privately and publicly-owned open space that are tied to the over-arching goals for open space and passive recreational uses both within and adjacent to the City IOF site. The Specific Plan identifies approximately 40 acres to be maintained for Natural Area open space. The Development Plan identifies areas for each category of open</p>

CULVER CITY GENERAL PLAN POLICY STATEMENT	CONSISTENCY DETERMINATION AND DISCUSSION
	<p>space. Although oil uses may continue within each of these areas, such uses would be interim and would not mutually exclude the concurrent benefit of open space characteristics. Generally, the Specific Plan supports the preservation and conservation of natural resources, including open space, in the community.</p> <p>Further, the Specific Plan protects open space resources because the Development Plan considers the entire City IOF as a whole and encourages consolidation of City IOF facilities within a centralized core (i.e., allowed development area) while preserving natural areas and steep slopes as open space. New construction and oil use development will be located within the existing City IOF area and Allowed Development area and will not encroach into natural hillside areas. The Specific Plan and Drilling Regulations seek to maintain hillside and natural areas for the purpose of preserving the visual quality of the City, protecting the public from safety hazards, and conserving natural resources</p> <p>In addition, the Development Plan ensures that existing scenic views from the Baldwin Hills Scenic Outlook and surrounding Baldwin Hills/Blair Hills open space area and trails are preserved and maintained.</p> <p>See also Responses to LUE Policy 1.G and 12.A.</p>
<p><u>LUE Policy 13.F</u> Encourage private contribution toward achieving open space goals.</p>	<p><u>Consistent.</u> The Specific Plan is consistent with this policy because the Open Space and Conservation Plan identifies private open space properties that will be managed in a manner that facilitates achieving the City's broader open space goals.</p> <p>See also Response to LUE Objective 13.</p>
<p><u>LUE Objective 14. Historic Preservation.</u> Promote the City's architectural and cultural heritage by preserving buildings and sites that reflect Culver City's varied history and development.</p>	<p><u>Consistent.</u> The Specific Plan is consistent with this objective because the Drilling Regulations include measures to ensure the protection of archaeological, paleontological, and historic resources within the City IOF (Section 30). Also, the EIR includes mitigation measures that establish protocols for field monitoring during construction or ground disturbance activity.</p>
<p><u>LUE Objective 15. Policy and Administration.</u> Establish clear and internally consistent policies for development.</p>	<p><u>Consistent.</u> The Specific Plan is consistent with this objective because it includes a set of oil drilling standards and regulations (Drilling Regulations) designed to protect the public health, safety and welfare and the environment and citizens of the City of Culver City and surrounding communities. The Specific Plan updates and supersedes the City's existing oil drilling regulations and is intended to address the changes in</p>

CULVER CITY GENERAL PLAN POLICY STATEMENT	CONSISTENCY DETERMINATION AND DISCUSSION
	the last decade in oil production-related technology, legislation, public concerns and environmental considerations. Further, the Specific Plan and Drilling Regulations function to consolidate under a single document the objectives, policies, development standards and guidelines within a singular document source to direct the permitting and administration of oil-related production and operational activities.
<u>LUE Policy 15.A</u> Implement General Plan policies and land use intensities through the use of zoning categories and development standards.	<u>Consistent.</u> The Specific Plan is consistent with this policy because it updates and supersedes the City's existing oil drilling regulations and is intended to address the changes in the last decade in oil production-related technology, legislation, public concerns and environmental considerations. Further, the Specific Plan establishes policy and standards for the continuation of oil uses as an interim use that is not mutually exclusive of opportunities for pursuing comprehensive long-term planning goals for the Blair Hills/Baldwin Hills Focused Special Study Area. See also Response to LUE Objective 15.
<u>LUE Policy 15.C</u> Streamline the project approval process.	<u>Consistent.</u> See Response to LUE Objective 15.
<u>LUE Objective 16. Land Use Compatibility.</u> Encourage mutually compatible land uses.	<u>Consistent.</u> See Responses to LUE Objectives 1, 12 and 13; LUE Policies 10.J, 12.A and 15.A; and NE Objective 1.
<u>LUE Policy 16.F:</u> Establish noise, safety, aesthetic and access criteria for areas impacted by existing incompatible land uses.	<u>Consistent.</u> The Specific Plan Drilling Regulations incorporate numerous regulations establishing of noise, safety, aesthetic and access criteria. See Response to LUE Objective 1. In addition, the Specific Plan mandates a 400-foot drilling buffer from Developed Areas, air monitoring and odor minimization plan, (Section 21); requires provisions to ensure the integrity of well casings (Section 47); testing of abandoned wells for hydrocarbon vapor and any liquid leaks (Section 48); and standards for abandonment of wells and well pads (Section 49).
<u>LUE Policy 16.H</u> Improve Zoning Code enforcement Citywide.	<u>Consistent.</u> See Response to LUE Objective 15 and LUE Policy 15A.
<u>LUE Objective 17. Managed Growth.</u> Establish development standards within clearly identified limits and at locations that allow opportunities for growth.	<u>Consistent.</u> The Specific Plan establishes clearly identified boundaries for oil and gas operations along with development standards for future buildout of the City IOF.
<u>LUE Objective 18. Adjacent Jurisdictions.</u> Coordinate development to minimize conflicts with adjacent jurisdictions.	<u>Consistent.</u> The Specific Plan is consistent with this objective because the Drilling Regulations establish procedures to facilitate coordination among the Culver City Fire Department, the Oil Field Operator, and the County Fire Department regarding emergency preparedness and response. Further, Drilling Regulations Section 55 requires the Oil Field Operator to hold annual community meetings to provide updates.
<u>LUE Policy 19.C</u> Investigate the possibility of using reclaimed water for irrigation.	<u>Consistent.</u> The Specific Plan is consistent with this policy because it includes policies targeting conservation and sustainability, including the use of reclaimed water for irrigation of landscaped areas within the City

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	IOF. Also, the Drilling Regulations require that the Surface Water Management Plan include provisions for the use of reclaimed water for irrigation (Section 26).
<u>LUE Policy 19.D</u> Coordinate land use policies with the appropriate City departments regarding impacts on staffing and services.	<u>Consistent.</u> See Responses to LUE Objectives 15 and 18; and LUE Policy 16.H.
<u>LUE Policy 20.C</u> Identify resource conservation measures consistent with objectives of Source Reduction and Recycling Element and the General Plan Conservation Element.	<u>Consistent.</u> The Specific Plan is consistent with this policy because the Drilling Regulations require that a Recycling and Removal Plan be prepared and implemented (Sections 28 and 34). Also the Specific Plan requires source reduction and recycling through the construction management planning and policies addressing conservation and sustainability for uses and activities conducted within the City IOF.
<u>LUE Objective 27. [Southeastern Sub-Area.]</u> Protect and enhance residential and business uses within the Southeastern Sub-Area.	<u>Consistent.</u> The Specific Plan is consistent with this objective because the Drilling Regulations incorporate regulations protective of surrounding residential and business uses within the Southeastern Sub-Area. See Response to LUE Objective 1. In addition, the Drilling Regulations include requirements to ensure the integrity of well casings (Section 47); testing of abandoned wells for hydrocarbon vapor and any liquid leaks (Section 48); and standards for abandonment of wells and well pads (Section 49).
<u>LUE Policy 27.A:</u> Protect the hillside character while balancing opportunities for new housing and visible and usable open space by establishing hillside development standards.	<u>Consistent.</u> See Response to LUE Policy 12.A.
<u>LUE Policy 27.B:</u> Protect the visible and usable open space resources within Blair Hills by establishing land use definitions for visual resources and natural areas that include guidelines for use. (See Open Space Element.)	<u>Consistent.</u> The City IOF is located immediately adjacent to the Blair Hills neighborhood. See Responses to LUE Policy 12.A and LUE Objective 13.
<u>LUE Policy 27.D:</u> Protect views of and from Blair Hills by establishing viewshed guidelines. (See Open Space Element.)	<u>Consistent.</u> While it is beyond the scope of the Specific Plan to establish viewshed guidelines for Blair Hills, the Drilling Regulations do incorporate regulations protective of surrounding residential and recreational areas by providing restrictions on tank locations (Section 16); restrictions on the number of drill rigs and a 400-foot setback for drilling activities (Section 21); restrictions of well stimulation from occurring within the 400-foot drilling buffer from Developed Areas (Section 32); and landscaping requirements to reduce visual intrusions (Section 37). See also Response to LUE Policy 12.A.
<u>LUE Policy 27.E:</u> Protect existing hillside uses and potential future uses by updating existing studies and requiring new ones concerning soil and seismic stability in Blair Hills, with respect to the Alquist-Priolo Earthquake Fault Zone and earthquake faults.	<u>Consistent.</u> The Specific Plan is consistent with this policy because the Drilling Regulations require that a Fault Investigation Report be completed prior to building structures in the Alquist-Priolo Fault Zone (Section 24). The Specific Plan and Drilling Regulations, combined with the mitigation program presented in the Draft EIR, includes requirements that protect the public health, safety and welfare, and protect the environment.

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<p>LUE Policy 27.F: Prepare a feasibility study and a Focused Special Study for the undeveloped portions of the Blair Hills/Baldwin Hills Areas to:</p> <ul style="list-style-type: none"> • Determine the appropriate range of uses and development standards for the south side of Jefferson [Boulevard] between Culver City Park and the multiple family residential area. • Assess the existing [condition] and value of biological and cultural resources within the undeveloped Blair Hills/Baldwin Hills Area. • Assess the slope, soil and seismic conditions of the undeveloped areas to determine capability for supporting desired uses. • Identify scenic views and viewsheds to be preserved and enhanced as part of any future development. • Determine the benefit to Culver City of annexing the unincorporated Los Angeles County lands west of La Cienega Boulevard by investigating the feasibility and appropriateness of open space and residential development. 	<p>Consistent. The Specific Plan is consistent with this policy because it establishes policy and standards for the continuation of oil uses as an interim use that is not mutually exclusive of opportunities for pursuing comprehensive long-term planning goals for the Blair Hills/Baldwin Hills Focused Special Study Area. Although the City IOF is currently utilized for oil uses, the EIR includes an assessment of existing conditions, including those for biological and cultural resources on the site and the impacts of the Specific Plan development on these resources. The Development Regulations include regulations that take into account a range of environmental and safety issues that could influence land uses (i.e., oil uses) within the City IOF.</p> <p>See also Responses to LUE Policy 12.A, OSE Objective 5, PSE Policy 1 and SSE Recommendation 1.</p>
Open Space Element (OSE)	
<p>OSE Objective 1. Open Space Protection and Acquisition. Protect and expand Culver City's open space resources by pursuing land acquisitions and encouraging private land contributions to achieve in the long term, the standard of 4 acres of local park land and school playground space per 1,000 residents.</p>	<p>Consistent. The Specific Plan supports the goals, objectives, and policies in the Open Space, Recreation and Conservation Elements by incorporating land planning features that support the protection and preservation of open spaces resources for potential long-term open space and recreational uses for Culver City. Protection of open space resources within the City IOF facilitates a broader City objective to increase the amount and network of public and private open space, recreational facilities, and trails for active and/or passive recreation activities.</p> <p>See also Responses to LUE Policy 1.G and 12.A, and LUE Objective 13.</p>
<p>OSE Policy (1.C) Encourage private contributions toward achieving open space goals.</p>	<p>Consistent. See Response to OSE Objective 1.</p>
<p>OSE Objective 3. Passive Recreation. Provide passive recreational open space within walking distance of all City neighborhoods.</p>	<p>Consistent. The Specific Plan is consistent with this objective because it facilitates the establishment of a network of public and private open space within the Blair Hills area. Adjacent to the City IOF area are numerous park and recreational facilities, including the Culver City Park, the Blair Hills Park, Baldwin Hills Scenic Overlook/State Park, the Kenneth Hahn State Recreation Area and the Stoneview Nature Center. Also, approximately 11 acres within the City IOF is owned by the Baldwin Hills Regional Conservation Authority (BHRCA) and a component of the Baldwin Hills Corridor. A segment (Segment C) of the Park-to-Playa Trail is located within this corridor and within the northeast portion of the Specific Plan area. The Specific Plan and Drilling Regulations include policies and</p>

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	<p>standards that are sensitive to protection of the trail system and passive recreation and open space features, both within the City IOF and the surrounding area.</p> <p>See also Response to OSE Objective 1.</p>
<p><u>OSE Policy 3.A</u> Protect existing open space resources in neighborhoods and pursue acquisition of additional passive open space resources in neighborhoods that are not provided with parks.</p>	<p><u>Consistent.</u> See Response to OSE Objective 3.</p>
<p><u>OSE Policy 3.F</u> Provide barrier free access to passive recreation areas.</p>	<p><u>Consistent.</u> See Response to OSE Objective 3.</p>
<p><u>OSE Objective 4. Natural Areas.</u> Protect and enhance valuable and sensitive cultural and natural resources, particularly biologically significant habitats within Blair Hills.</p>	<p><u>Consistent.</u> The Specific Plan is consistent with this objective because it establishes a Land Use Concept and an Open Space and Conservation Plan that identify areas of private and public open space, including open space areas that will be predominately maintained as Natural Area. Approximately 40 acres within the northern portion (i.e., within the 400-foot setback buffer area) are designated for Natural Area open space. The Development Plan identifies areas for other categories of passive and visual open space, that also incorporate natural areas, providing for the protection of biological habitats, and other valuable cultural and natural resources.</p> <p>The majority of habitat on the IOF has been fragmented and isolated by oil field operations. Vegetation scattered throughout the City IOF area includes: degraded California sagebrush/buckwheat scrub; California sagebrush scrub; eucalyptus naturalized forest; disturbed/degraded scrub; ruderal or weed dominated areas; ornamental; and non-native ice plant dominated areas. Two vegetation types that have been previously mapped on the City IOF are considered special status: California sagebrush scrub, and California sagebrush-California buckwheat scrub. No federally or State listed plant species are expected to occur on the City IOF area.</p> <p>The Specific Plan and Drilling Regulations, as well as mitigation measures identified in the EIR, include provisions to preserve and enhance biological resources, including vegetative communities and wildlife and its habitat, subject to the safety of residents and property. For example, the landscaping guidelines require utilization of drought-tolerant and native vegetation for newly landscaped areas.</p> <p>The Specific Plan policies and Development Plan support development that preserves the City's natural environment, natural resources and</p>

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	<p>viewsheds, through sensitive siting, and construction that minimizes the impact of grading and other development. In areas that are adjacent to sensitive vegetation and/or wildlife communities and/or open spaces, new development will employ site design techniques that provide buffers between the development and the biological resources and to landscape their sites with vegetation that is consistent with the adjacent resources, in balance with “fire safe” considerations.</p> <p>More specifically, the Drilling Regulations incorporate requirements to protect Rare, Threatened, or Endangered species (Section 29). These include, but are not limited to revegetation of areas disturbed during an oil spill or clean-up activities; preparation of a Special Status Species and Habitat Protection Plan; compliance with U.S. Fish and Wildlife and California Department of Fish and Wildlife rules and regulations for listed plant or wildlife species; and habitat restoration in sensitive natural habitat areas disturbed by drilling activities.</p> <p>See also Responses to OSE Objectives 1 and 3.</p>
<u>OSE Policy 4.A</u> Establish hillside development guidelines for slope, preservation of topographic relief, and habitat preservation.	<u>Consistent.</u> See Responses to LUE Policy 12.A and OSE Objective 4
<u>OSE Policy 4.C</u> Establish standards for buffers and access within areas to be preserved as natural areas.	<u>Consistent.</u> See Responses to LUE Policy 12.A and OSE Objective 4
<u>OSE Policy 4.E</u> Explore the possibility of making open space trail connections to the natural area of Blair Hills from Culver City Park and Blair Hills Park.	<u>Consistent.</u> See Responses to OSE Objectives 1 and 3
<u>OSE Policy 4.F:</u> Protect open space and natural areas which contain or support rare, threatened or endangered species.	<u>Consistent.</u> See Responses to LUE Policy 12.A and OSE Objective 4
<u>OSE Objective 6. Viewsheds and Scenic Vistas.</u> Protect view resources, view corridors and scenic viewpoints.	<u>Consistent.</u> See Response to LUE Policy 12.A.
<u>OSE Policy 6.A:</u> Establish viewshed guidelines which protect views of and from Culver City Park, Blair Hills and Culver Crest.	<u>Consistent.</u> The Specific Plan is consistent with this policy because the Drilling Regulations incorporate several regulations in order to protect views of and from Culver City Park and Blair Hills. These regulations include restrictions on tank locations (Section 16); restrictions on the number of drill rigs and a 400-foot setback for drilling activities (Section 21); establishes the maximum number of wells to be drilled on an annual basis and at any one time (Section 31); restricts well stimulation from occurring within the 400-foot drilling buffer from Developed Areas (Section 32); and provides for landscaping and painting requirements (Section 37/41). Culver Crest is not located adjacent to the Specific Plan areas.

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<p><u>OSE Objective 7. Maintenance.</u> Protect open space resources and their users.</p>	<p>See also Response to LUE Policy 12.A.</p> <p><u>Consistent.</u> The Specific Plan is consistent with this policy because it supports the protection of open space resources and the safety of the public accessing these resources. The majority of the City IOF is designated in the General Plan as Open Space and the Specific Plan allows for the continuation of current oil uses in a manner that is not mutually exclusive of open space uses and protection of those resources. The Drilling Regulations incorporate restrictions on future development intended to promote the health, safety, and welfare of adjacent land uses. The Specific Plan, combined with the mitigation program presented in the EIR, facilitate the protection of open space and its users both within the City IOF and surrounding areas.</p> <p>See also Responses to LUE Objective 13 and OSE Objective 4.</p>
<p><u>OSE Policy 7.C</u> Reduce inappropriate use of open space areas through design and maintenance which facilitates law enforcement.</p>	<p><u>Consistent.</u> See Response to OSE Objective 7</p>
Recreation Element (RE)	
<p><u>RE Recommendation 1.C.</u> An urban park, approximately 50 acres in size, shall be acquired by the city after feasibility studies have been completed as to the best method of acquisition. Said urban park shall be located in the Baldwin Hills, near or adjacent to the southerly boundary of the proposed West Los Angeles Junior College.</p>	<p><u>Consistent.</u> See Responses to LUE Policy 1.G, and OSE Objectives 1 and 3</p>
Conservation Element (CNE)	
<p><u>CNE</u> One means by which the conservation goals can be achieved is through pollution prevention and control.</p>	<p><u>Consistent.</u> The Specific Plan is consistent with this goal because an Environmental Impact Report (EIR) was prepared to analyze potential environmental impacts due to implementation of the Specific Plan and the continuation of oil uses as a legal nonconforming use within the City IOF. The EIR establishes the required mitigation, as set forth in the Mitigation Monitoring and Reporting Program that avoids, minimizes or manages in accordance with best management practices, potential pollution and pollutant emission sources.</p> <p>Further, the Specific Plan and Drilling Regulations require a Construction Management Plan that will ensure that best management practices are implemented to minimize air pollutant emissions, including fugitive dust. Further, the Construction Management Program will include measures to control erosion and reduce sediment impacts during construction. A Construction Management Program that establishes performance expectations during construction is included in the Specific Plan.</p>

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CNE Baldwin Hills is identified as area of conservation for future public use.	Consistent. See Responses to LUE Policy 1.G, and OSE Objectives 1 and 3
Public Safety Element (PSE)	
PSE Policy 1: Establish and enforce standards and criteria to reduce unacceptable levels of fire and geologic risk.	Consistent. The Specific Plan is consistent with this policy because the Drilling Regulations incorporate regulations to reduce fire hazards, including, annual fire operating permit, minimum standards for fire equipment, fire prevention requirements, audits, spill containment response personnel, training and equipment, an Emergency Response Plan, community alert notification system, annual drills and site assessments (Section 12). The Drilling Regulations incorporate regulations to reduce geologic risks, including geotechnical investigation, Accumulated Ground Movement Plan and Survey, ground movement threshold limits, Fault Investigation Report, seismic activity tracking, Erosion Control Plan and slope restoration (Section 24). The Specific Plan and Drilling Regulations, combined with the mitigation program presented in the Draft EIR, includes requirements that protect the public health, safety and welfare, and protect the environment.
PSE Policy 2: Reduce fire hazards associated with older buildings.	Consistent. See Response to PSE Policy 1
PSE Policy 4: Encourage improved fire protection for multi-story structures and high-hazard industrial facilities.	Consistent. See Response to PSE Policy 1
PSE Policy 5: Develop stringent site criteria for construction in areas with fire and/or geologic problems and prohibit construction if these criteria are not met.	Consistent. The Specific Plan is consistent with this policy because the Drilling Regulations require an on-site monitor, at the City's discretion, to monitor City IOF compliance, including construction activities (Section 7); construction and grading permits for the erection of permanent structures (Section 10); Building Official approval of all sump and reservoir construction (Section 13); erosion control plan prior to conducting grading and drilling activities, which includes construction (Section 24); standards for the design and construction of roads and other excavations to provide stability of fill and minimize erosion (Section 38). See also Response to PSE Policy 1
PSE Policy 6: Encourage continued research in the fields of geologic and fire safety.	Consistent. The Specific Plan is consistent with this policy because the Drilling Regulations require a Ground Movement Plan and Survey, the installation of an accelerometer (Section 24). Mitigation measures in Section 4.5 of the EIR encourage study of deep wastewater disposal.
PSE Policy 7: Strengthen existing codes and ordinances pertaining to fire and geologic hazards.	Consistent. The Specific Plan is consistent with this policy because the Specific Plan and Drilling Regulations, combined with the mitigation program presented in the EIR, include requirements that protect the public health, safety and welfare, and protect the environment. The Drilling Regulations incorporate regulations to reduce fire hazards, including,

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	annual fire operating permit, minimum standards for fire equipment, fire prevention requirements, audits, spill containment response personnel, training and equipment, an Emergency Response Plan, community alert notification system, annual drills and site assessments (Section 12). The Drilling Regulations incorporates regulations to reduce geologic risks, including geotechnical investigation, Accumulated Ground Movement Plan and Survey, ground movement threshold limits, Fault Investigation Report, seismic activity tracking, Erosion Control Plan and slope restoration (Section 24).
PSE Policy 8: Develop and support the use of new technology in the suppression and prevention of fires.	Consistent. The Specific Plan is consistent with this policy because the Drilling Regulations establish comprehensive procedures for the prevention and suppression of fires. Overall, the Specific Plan updates and supersedes the City's existing oil drilling regulations and is intended to address the changes in the last decade in oil production-related technology, legislation, public concerns and environmental considerations, including provisions that address fire safety. Also, the Specific Plan includes policy guidelines for the establishment and management of brush through a fuel modification program.
PSE Policy 9: Require all new development and selected existing development to comply with established fire and geologic safety standards.	Consistent. The Specific Plan is consistent with this policy because the Specific Plan and Drilling Regulations, combined with the mitigation program presented in the EIR, includes requirements that protect the public health, safety and welfare, and protect the environment. The Drilling Regulations includes provisions to reduce fire hazards, including, annual fire operating permit, minimum standards for fire equipment, fire prevention requirements, audits, spill containment response personnel, training and equipment, an Emergency Response Plan, community alert notification system, annual drills and site assessments (Section 12). The Drilling Regulations incorporates regulations to reduce geologic risks, including geotechnical investigation, Accumulated Ground Movement Plan and Survey, ground movement threshold limits, Fault Investigation Report, seismic activity tracking, Erosion Control Plan, and slope restoration (Section 24).
PSE Policy 10: Improve programs and practices for dealing with land subsidence and erosion.	Consistent. See Response to PSE Policy 6
PSE Policy 13: Review and improve disaster preparedness and emergency response capabilities.	Consistent. The Specific Plan is consistent with this policy because the Specific Plan and Drilling Regulations, combined with the mitigation program presented in the EIR, includes requirements that protect the public health, safety and welfare, and protect the environment. The Drilling Regulations incorporate regulations to ensure appropriate disaster preparedness and emergency response, including, annual fire operating

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	permit, minimum standards for fire equipment, fire prevention requirements, audits, spill containment response personnel, training and equipment, an Emergency Response Plan, community alert notification system, annual drills and site assessments (Section 12).
PSE Policy 14: Increase cooperation and coordination between the various jurisdictions and agencies involved in fire protection and the mitigation of geologic problems.	Consistent. See Responses to LUE Objective 18 and LUE Policy 19.D.
Seismic Safety Element (SSE)	
<p>SSE Geologic Soils Recommendations. In regard to the City requirements for geological-soils investigations, the following procedures are recommended:</p> <p>SSE Recommendation 1: Geologic investigations should be required in the hillside areas and along the Inglewood, Overland and Charnock faults. Major considerations in the hillside areas will be cut-slope stabilities, subsidence, possible surface cracking and faulting related to subsidence, oil field operations and related waste sumps, uncontrolled fills and over-steepened cut-slopes. The principal considerations along the fault zones will be their exact location and state of activity.</p>	<p>Consistent. The Specific Plan is consistent with this recommendation because the Drilling Regulations incorporate provisions that require on-going soils, slope stability, faults, subsidence, seismic and other geotechnical hazards investigations and mitigations. For example, Drilling Regulations Section 24, Geotechnical, requires a site-specific geotechnical investigation to be completed for permanent structures and for grading in excess of 1,000 cubic yards. The Drilling Regulations also include restrictions on gradients, erosion control, and restoration of slopes within 30 days of the discontinuance of use. The Specific Plan and Drilling Regulations also requires an accumulated ground movement plan; an Accumulated Ground Movement Survey; sets ground movement threshold limits; requires a Fault Investigation Report for tanks or structures within the Alquist-Priolo Earthquake Fault Zone; seismic activity tracking; an Erosion Control Plan; and provisions for slope restoration. The Specific Plan and Drilling Regulations, combined with the mitigation program presented in the Draft EIR, includes requirements that protect the public health, safety and welfare, and protect the environment.</p>
<p>SSE Recommendation 2: Soils investigations should be required for all developments within the City. Problems of expansive and boggy soil conditions will be particularly important considerations by the soils engineer. Potentially high ground-water conditions could result in the future and should receive the attention of the soils engineer.</p>	<p>Consistent. See Response to SSE Recommendation 1.</p>
<p>SSE Recommendation 3: The above investigations should be required prior to City approval of the following three stages of development: (1) tentative tract design, (2) the final grading plan, and (3) following rough grading but prior to issuing building permits.</p>	<p>Consistent. See Response to SSE Recommendation 1.</p>
<p>SSE Recommendation 5: Specific studies that the City should consider making at this time are: (1) the monitoring of continued rate of subsidence based on continued survey data available from City and County engineering and survey divisions, and (2) investigation of the Inglewood, Overland and Charnock faults in the subsurface.</p>	<p>Consistent. See Response to SSE Recommendation 1.</p>

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Circulation Element (CE)	
CE Policy 1A: Facilitate movement of vehicles at intersections and along roadway links by increasing capacity, improving operation, and reducing volumes as appropriate and feasible.	Consistent. The Specific Plan is consistent with this policy because the Drilling Regulations require that traffic generated by oil operations avoid peak hours and residential roadways to the maximum extent feasible and that all truck routes and oversized vehicle trips be approved by the Public Works Director/City Engineer (Section 38). Further, CCMC Section 7.02.210 requires that trucks use designated truck routes.
CE Objective 7. Traffic Safety. Minimize traffic hazards and accidents.	Consistent. See Response to CE Policy 1.A.
CE Policy 7.B: Minimize potential traffic hazards at new developments.	Consistent. See Response to CE Policy 1.A.
Noise Element (NE)	
NE Objective 1. Land Use Compatibility. Ensure the compatibility of adjacent land uses with regard to noise sources and receptors.	Consistent. The Specific Plan is consistent with this objective because the Drilling Regulations require that a Quiet Mode Drilling Plan be completed concurrently with the Comprehensive Drilling Plan which shall, among things, address noise barriers and the handling of pipes. In addition to regulations for specific hours of operations, the Drilling Regulations restrict backup alarms and exceedences of baseline noise levels and requires consistency with current noise regulations and noise attenuation as a condition of drilling permit approval (Section 22). It also restricts well stimulation from occurring within the 400-foot drilling buffer from Developed Areas (Section 32). See also Responses LUE Objectives 1, 18 and 27; and LUE Policy 16.F.
NE Policy 1.A: Ensure the consistent application of adopted noise standards and criteria in the review of all discretionary land use decisions.	Consistent. See Response to NE Objective 1.
NE Policy 1.B: Reexamine the City's noise regulations Ordinance on a regular basis to ensure its effectiveness.	Consistent. The Specific Plan is consistent with this policy because implementation of the Specific Plan includes amendment to CCMC Chapter 9.07.060 (Noise Regulations, Exemption from Provisions) to add that oil operations within the City IOF are exempt from the provisions of Chapter 9.07 Noise Regulations, and instead shall comply with this Specific Plan. The Drilling Regulations establish operational hours, threshold restrictions and noise attenuation requirements for the drilling of new wells, other construction activity and ongoing operations. See also Response to NE Objective 1.

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<p>NE Policy 1.D: Investigate the opportunity to construct barriers to mitigate sound emissions where necessary and where feasible.</p>	<p>Consistent. The Specific Plan is consistent with this policy because the Drilling Regulations require that the best available measures for the prevention of excessive and annoying noise are implemented. Further, a Quiet Mode Drilling Plan must be completed concurrently with the Comprehensive Drilling Plan which shall include, among things, the installation of noise barriers.</p> <p>See also Response to NE Policy 1.B.</p>
<p>NE Policy 1.E: Identify mediation techniques to help neighbors resolve their differences and be more considerate of the effects of noise.</p>	<p>Consistent. The Specific Plan is consistent with this policy because it has been established through a public process that involved community meetings with local residents and relevant public agencies and organizations. Any amendments to the Specific Plan will require a similar public process to seek community input on the land use issues and policies of the Specific Plan. Further, Drilling Regulations Sections 22.K and 54 establish a procedure for addressing any noise complaints that may be identified. Section 55 requires the Oil Field Operator to hold annual community meetings to provide updates.</p>
<p>NE Objective 2. Stationary Noise Sources. Protect those areas that are or may be subject to unacceptable noise from stationary noise sources.</p>	<p>Consistent. See Responses to NE Objective 1 and NE Policies 1.D and 1.E.</p>
<p>NE Policy 2.A: Create a comprehensive ordinance establishing noise regulation criteria, and noise standards for noise sources and receptors to include but not be limited to the following:</p> <ul style="list-style-type: none"> Standards for temporary and “event” noise sources, such as carnivals and entertainment productions. Noise reduction features during site planning to mitigate anticipated noise impacts on affected noise sensitive land uses, such as schools, hospitals, convalescent homes, and libraries. State Uniform Building Code (UBC) standards for interior community noise levels applied to single-family dwellings. Standards for mechanical equipment such as fans, air conditioners, compressors, and exhaust vents. Temporary sound barrier installation at construction sites if construction noise is impacting nearby noise sensitive land uses. <p>Noise abatement and acoustical design criteria for construction and operation of any new developments.</p>	<p>Consistent. See Responses to NE Objective 1 and NE Policies 1.D and 1.E.</p>

APPENDIX C
DRILLING REGULATIONS

DISCUSSION DRAFT OIL DRILLING REGULATIONS
FOR THE CULVER CITY PORTION OF THE
INGLEWOOD OIL FIELD

Section 1	Purpose and Intent
Section 2	Acronyms and Definitions
Section 3	Applicability
Section 4	Application Filing, Processing, Review, Drilling Plan Amendments and Fees
Section 5	Findings and Decision
Section 6	Conditions on Assignment of Drilling Use Permit and Drilling Plans
Section 7	Condition Compliance
Section 8	Expiration, Revocation or Modification of Permit
Section 9	Other Administrative Items
Section 10	Construction and Grading Permits
Section 11	Operating Standards
Section 12	Fire Operational Permit, Protection and Emergency Response
Section 13	Sumps Prohibited
Section 14	Major Facilities Prohibited
Section 15	Tanks
Section 16	Location of Tanks
Section 17	Piping and Electrical Equipment
Section 18	Dikes and Retaining Walls
Section 19	Toilet and Wash Facilities
Section 20	Safety and Risk of Upset
Section 21	Air Quality, Public Health and Climate Change
Section 22	Noise Attenuation
Section 23	Vibration Reduction
Section 24	Geotechnical
Section 25	Groundwater Monitoring
Section 26	Surface Water Management
Section 27	Stormwater and Drainage Management
Section 28	Storage of Hazardous Materials and Oil Field Waste Removal
Section 29	Biological Resources
Section 30	Cultural Resources

Section 31	Consolidation and Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration
Section 32	Well Stimulation Treatments
Section 33	Well Reworking
Section 34	Processing
Section 35	Well Cellars
Section 36	Lighting
Section 37	Landscaping
Section 38	Public Roadways and Private Road Construction
Section 39	Signs
Section 40	Equipment Removal and Maintenance
Section 41	Other Standards
Section 42	Directional Drilling Surveys Required on Certain Wells
Section 43	Duplicate Notices
Section 44	Inspection of Premises
Section 45	Well and Production Reporting
Section 46	Idle Well Testing and Maintenance
Section 47	Injection Wells
Section 48	Abandoned Well Testing
Section 49	Well and Well Pad Abandonment
Section 50	City Request for Review of Well Status
Section 51	Oil Field Abandonment Procedures
Section 52	Safety Inspection, Maintenance, and Quality Assurance Program (SIMQAP)
Section 53	Compliance and Safety Audits
Section 54	Complaints
Section 55	Community Outreach
Section 56	Conflict of Provisions
Section 57	Schedule for Abandonment of Wells or Oil Field

SECTION 1. PURPOSE AND INTENT.

The provisions in these Drilling Regulations establish safeguards and controls for activities related to drilling for and production of oil, gas, and other hydrocarbon substances within the Oil Field, that include, but are not limited to, ensuring the following:

- A.** Oil Operations are conducted in a comprehensively coordinated manner consistent with a programmatic plan for a defined physical area and in harmony with adjacent land uses and in a manner that protects the public health, safety and welfare, and the environment;

- B.** Cooperation and coordination among affected and adjacent government agencies in implementing all reasonable measures to reduce impacts to the surrounding communities;
- C.** Cooperation and coordination for multi-agency response to Oil Field emergency situations;
- D.** Minimization or elimination of potential adverse environmental, public health and safety impacts of Oil Operations by the implementation of area-specific regulations and mitigation measures;
- E.** Before new Oil Field drilling activities are permitted, that existing Oil Field facilities are in compliance with the requirements of these Drilling Regulations and the Specific Plan;
- F.** Minimization of Oil Field emergencies; in the event that an emergency occurs, regulations are in place to assist affected and adjacent government agencies in identifying all reasonable measures to reduce impacts to surrounding communities;
- G.** Appearance of the Oil Field site is enhanced with landscaping and other property maintenance requirements in order to preserve and improve the visual character and quality of the surrounding uses; and
- H.** New applications for oil and gas Drilling Use Permits address the consolidation of Oil Field facilities to reduce odor, visual, noise, safety, health, and environmental impacts from Oil Operations to surrounding land uses and City residents.

SECTION 2. ACRONYMS AND DEFINITIONS.

A. Acronyms.

API – American Petroleum Institute

CalARP – California Accidental Release Prevention Program.

CARB – California Air Resources Board

CCMC – Culver City Municipal Code

CDFW – California Division of Fish and Wildlife

CEC – California Energy Commission

CEQA – California Environmental Quality Act (PRC §§ 21000, *et seq.*) and the CEQA Guidelines (Title 14, CCR §§ 15000, *et seq.*)

dBA – decibel (measurement of noise level)

DOGGR – California Department of Conservation, Division of Oil, Gas and Geothermal Resources

EIR – Environmental Impact Report

EPA – United States Environmental Protection Agency

ERP – Emergency Response Plan

MMRP – Mitigation Monitoring and Reporting Program

NFPA – National Fire Protection Association

RWQCB – Regional Water Quality Control Board, Los Angeles Region

SIMQAP – Safety Inspection, Maintenance, and Quality Assurance Program

SCAQMD – South Coast Air Quality Management District

SWPPP – Stormwater Pollution Prevention Plan

SPCCP – Spill Prevention, Control, and Countermeasure Plan (40 CFR, Part 112)

- B. Definitions.** In addition to the definitions contained elsewhere in the CCMC, the following words and phrases shall, for the purposes of these Drilling Regulations and the Specific Plan, be defined as follows, unless it is clearly apparent from the context that another meaning is intended. Should any of the definitions be in conflict with any other provisions of the CCMC, these definitions shall prevail.

Abandonment. The permanent plugging of a well, pipeline, or other facility in accordance with the requirements of DOGGR, the removal of all equipment related to the well, including the restoration of the drill site or well operation site as required by DOGGR regulations.

Annual Consolidation and Drilling Plan (or Annual Drilling Plan). The Annual Consolidation and Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan as set forth in Section 31.

Blowout. An uncontrolled flow of well fluids and/or formation fluids from a well bore to the surface or into lower-pressured subsurface zones (underground blowout).

Blowout Preventer. A valve attached to the casing head of a well, allowing the well to be sealed at the surface and confining well fluids to the well bore.

Bottom Hole. The underground location at which the well bores terminate.

Breakdown. Any event that results in a violation of applicable SCAQMD rules as specified in SCAQMD Rule 430.

California Environmental Quality Act (CEQA). State law that requires the evaluation of a project's potential impact on the environment such as impacts to air quality, aesthetics, noise, as examples. CEQA is found in Public Resources Code §§ 21000, et seq. and the CEQA Guidelines (Title 14, California Code of Regulations §§ 15000, et seq.), which provide guidance on the content, format, and process for preparing environmental reports.

City. The City of Culver City.

City Council. The City Council of the City of Culver City.

Clean Technology. General reference to describe equipment, engines, machinery, products, processes or services that reduce waste, reduce the use of non-renewable natural resources and minimize or eliminate emissions,

Clean Technology Assessment. An evaluation, to be completed annually, of available clean technology options and the potential to incorporate those technologies into the planning and operations at the Culver City Inglewood Oil Field.

Community Development Director. The Director of the Community Development Department of the City of Culver City, or his/her designee.

Comprehensive Drilling Plan. A long-range, conceptual plan consistent with these Drilling Regulations, proposed by each Operator within the Oil Field, which describes and depicts the Oil Operations through the year 2032.

Consolidate or Consolidation. The clustering of multiple wells or Oil Field facilities within a geographically smaller footprint, including for example, consolidation within a portion of the Specific Plan area that is outside the 400-foot setback from Developed Areas, or the grouping of wells and facilities within pre-determined consolidated well site areas. Consolidation may also include the consolidation of facilities overall to provide for improved efficiency and sharing of infrastructure. Consolidation may also include concepts for the staged abandonment of wells, or the replacement of older, outdated and obsolete facilities with more efficient and improved technology or equipment accompanied by placement of such technology or equipment within approved areas to preserve or improve the visual character and/or protect natural resources and open space areas.

Deep Zone Well. A well where the Bottom Hole is proposed in a deep zone (Nodular Shale and Sensitive zones or any other production zone located at 8,000 feet below ground surface or deeper).

Derrick. Any portable framework, tower, mast, or structure which is required or used in connection with drilling, re-drilling, reworking, operating, or maintaining a Well.

Developed Area. Any lot or parcel of land containing any residential, recreational (e.g. public park), institutional (e.g. school), commercial, industrial or office structure, or used for residential, recreational, institutional, commercial, industrial or office purposes. This definition does not include structures that serve administrative functions in the Oil Field.

Drilling. The digging or boring into the earth for the purpose of exploring for, developing, extracting or producing oil, gas, or hydrocarbon substances from the earth or for the purpose of injecting water, steam, or any other fluid or substance into the earth, but does not include remediation efforts to clean-up or remove contamination.

Drilling Equipment. The derrick or rig, together with all parts of and appurtenances to such structure and, every piece of apparatus, machinery, or equipment used or erected or maintained for use in connection with drilling or re-drilling, reworking, or deepening of any Well hole.

Drilling Project. The erection of any derrick, rig, or similar or related structure (including a rework rig) and/or use of any mobile drilling equipment for the drilling,

redrilling, reworking or deepening of any Well hole, or the redrilling or reactivation of any abandoned Well. A Drilling Project shall also include the installation and operation of pumps or similar equipment for the production of oil and gas or injection of water in association with the Well hole.

Drilling Regulations. The regulations, as set forth in Appendix C of the Inglewood Oil Field Specific Plan, governing the continuation of oil uses as a nonconforming use within the Oil Field area and Specific Plan boundary, as defined in Appendix A, Boundary Description, of the Specific Plan.

Drilling Use Permit. A City permit reviewed and processed in compliance with these Drilling Regulations and the Specific Plan which is necessary to conduct any Drilling Project. More than one Drilling Project may be approved under one Drilling Use Permit, provided that each Drilling Project is a part of the approved Annual Drilling Plan. .

Drill Site. That portion of any land on which drilling equipment is placed, stored, or utilized during the drilling, redrilling, reworking or deepening of a Well.

Emergency Response Plan. A plan to handle anticipated emergencies as required by Section 5192 of Title 8 of the California Code of Regulations and the EPA requirements set forth in 40 Code of Federal Regulations 112, or with any emergency response regulations enacted or modified by the State of California or EPA or local agency, which are applicable to the Oil Field.

Enhanced Oil Recovery. Injection of steam, gas, or other chemical compounds into hydrocarbon reservoirs to stimulate the production of usable oil beyond what is possible through natural pressure, water injection, and pumping at the wellhead. Enhanced oil recovery does not include routine well cleanout work, routine well maintenance, routine removal of formation damage due to drilling, bottom hole pressure surveys, or routine activities that do not affect the integrity of the well or the formation.

Fire Chief. The Fire Chief of the City of Culver City or his or her designee.

Fluids. A substance in which molecules move freely without a fixed shape, this includes any liquid or gas at ambient or working temperatures and pressures.

Gas. Any substance, either combustible or noncombustible, which is produced in a natural state from the earth and which maintains a gaseous or rarefied state at standard temperature and pressure conditions. It shall also mean the gaseous components or vapors occurring in, or derived from, petroleum or natural gas.

Good Cause. In the context of these Drilling Regulations, requires the Oil Field Operator to meet the burden of proof to provide substantial evidence that the asserted basis for a requested extension or minor deviation from any specific deadline, reporting, monitoring or other requirement, as set forth in these Drilling Regulations, constitutes an adequate justification for the requested extension and is necessary in order to achieve full compliance with the applicable provision. In part, that burden of proof shall include an explanation of the good faith effort that has been expended toward fulfilling the applicable provision in a timely manner, and shall also include a proposed revised date certain for compliance. Upon

determination that the Oil Field Operator has made a good faith effort to comply, the Community Development Director (or Public Works Director, Fire Chief or other City designee, as appropriate) may extend the time or reporting provisions as appropriate. Whenever an extension is requested, the Director shall notify the Council of such request prior to acting upon same.

Idle Well. Any well that has not produced oil or gas or has not been used for injection for six consecutive months of continuous operation during the last five or more years. An idle well does not include an active observation well.

Inglewood Oil Field. The approximate 1000-acre oil field located within and straddling the jurisdiction of the City of Culver City and the unincorporated area of the County of Los Angeles known as Baldwin Hills.

Injection Well. Any well used for the purpose of injecting water, produced water, waste water, brine, hydrocarbons or steam, or for the purpose of injecting any other substance as a means of enhanced oil recovery.

Maintenance. The diagnosis, repair or replacement of machinery, equipment, apparatus, structures, facilities, and parts thereof, used in connection with Oil Operations as well as any other work necessary to reduce public health or safety hazards, other than drilling, redrilling, or reworking.

Major Facilities. Major facilities include refineries, fractionation (such as distillation) activities, absorption plants, gas plants, gas processing, bioremediation facility, steam drive plant, oil cleaning plant, carbon dioxide separation or recovery plant, or water treating and processing facility. Major facilities are prohibited within the Oil Field.

Mid-Zone Well. A well where the Bottom Hole is located in a mid-zone (Rubel, Moynier, Bradna, and City of Inglewood zones and any other production zone located between 3,500 feet and 7,999 feet).

Mitigation Monitoring and Reporting Program. A document describing all the mitigation measures identified in the certified Environmental Impact Report for the Inglewood Oil Field Specific Plan project, that includes a statement(s) of how, when and by whom each mitigation measure will be implemented, monitored and enforced.

New Well. A new well bore or well hole established at the ground surface or the deepening or redrilling of an existing well. An abandoned well that is redrilled or reactivated shall be considered a new well.

Odor Suppressant. An organic emulsifier, or other compound, that is used to eliminate hydrocarbon odors by reducing the emissions/release of odor causing compounds. Organic emulsifiers, or other compounds, that mask or change the perceived odor from malodorous compounds by using other less malodorous substances are not considered odor suppressants.

Oil. Crude oil.

Oil Field. The approximate 77.8-acre area comprised by the exterior surface limits of the Inglewood Oil Field that falls within the jurisdiction of the City of Culver City,

and which are within the Specific Plan boundary as described in Appendix A, Boundary Description, of the Specific Plan.

Oil Operations. Any activity within the Oil Field undertaken in connection with the extraction, processing, production, storage or transport of oil, gas, or other hydrocarbon substances including, but not limited to, drilling, redrilling, reworking, maintenance, repair, installation, construction operations, processing, enhanced oil recovery, well abandonment, remediation, clean-up, demolition, restoration, and revegetation.

Operational Permit (Annual or Temporary). Annual or Temporary Operational Permit as required and administered by the Culver City Fire Prevention Division for activities listed in Chapter 1 of the California Fire Code.

Operator. A person, firm, corporation, partnership, association, limited liability company, or other business entity that owns or holds the right to use the surface of the land to extract oil, gas, and other hydrocarbon substances. In the event there are two or more persons or entities who qualify as Operators at any given time, then this term shall apply to all entities with regard to their respective operations.

Outer Boundary. The boundary limit of the Specific Plan and Oil Field, which is generally coincident with the exterior surface limits of the Oil Field within the City's jurisdiction and contiguous with the Specific Plan interface with Developed Areas parcels, as identified in Appendix A, Boundary Description, of the Inglewood Oil Field Specific Plan.

Permanent Structure. Any building, facility, or equipment that requires a permit under Section 105 of the current California Building Code, as adopted by the City, is intended to, or does, remain in place for more than one year, and shall include all tanks.

Petroleum. An oily flammable liquid that may vary from almost colorless to black, occurs beneath the earth's surface, is a complex mixture of hydrocarbons and other substances, and may be refined or processed to make gasoline, diesel, lube oil, asphalt, and other products.

Pipeline Management Plan. A plan prepared in accordance with California Code of Regulations (CCR) Section 1774.2, and per format guidelines provided through DOGGR, that documents the history, testing and integrity management for all pipelines that have not otherwise been abandoned per DOGGR requirements.

Processing. The activities required for oil, gas or other hydrocarbon phase separation, and transport, but does not include oil and gas processing activities identified in the prohibited Major Facilities defined above. Processing includes unheated phase separation and dehydration of crude oil and gas produced from the well, the storage, handling, recycling, and transportation of such materials; and those processing operations required for water injection purposes.

Produced Water. Water that is produced or extracted as a byproduct during oil and gas production.

Public Works Director/City Engineer. The Director of Public Works/City Engineer of the City of Culver City or his/her designee.

Pure Tones. Any noise which is judged as audible as a single frequency or a set of single frequencies. Pure tones include but are not limited to noise from whistles, bells, fans or other mechanical devices that emit audible tones.

Redrilling. Any drilling operation conducted through the surface opening of an existing well or abandoned well to deepen the well or to create a new bore hole diverting below the surface of the earth from an existing bore of an existing well.

Reworking. Recompletion of an existing well, which includes operations such as liner replacements, perforating and acidizing, but does not include deepening or sidetrack operations that extend beyond the existing well bore. The principal piece of equipment used for reworking is sometimes referred to as a workover rig.

Sensitive Developed Area. A lot or parcel that contains a single or multi-family residence, park, school, or health care facility.

Shallow Wells. The Bottom Hole is less than 3,500 feet deep.

Site Assessment. An evaluation of areas surrounding a known or suspected spill or release of petroleum or other hazardous substances for potential contamination of soils and surface or subsurface areas for the presence of petroleum or other hazardous substances that may require removal or remediation for the protection of human health or the environment.

Slant Drilling. Non-vertical drilling, directional drilling, or drilling at a relatively significant angle.

Specific Plan. The Inglewood Oil Field Specific Plan (Specific Plan), a planning policy and regulatory document, adopted by the Culver City Council, which incorporates the Oil Drilling Regulations for the Culver City Portion of the Inglewood Oil Field (Drilling Regulations). The Specific Plan implements the goals, objectives and policies of the Culver City General Plan and establishes updated policy and regulations for the continuation of oil uses as a nonconforming use within the Oil Field.

Spill Prevention, Control, and Countermeasure Plan (SPCCP). A plan required under 40 Code of Federal Regulations Part 112, or of any subsequently enacted and currently in effect EPA provisions. The SPCCP addresses the prevention, control, and mitigation of oil spills to avoid impacts to navigable waters.

Subsidence. The sinking of the ground surface due to extraction of petroleum or groundwater.

Top Hole. The surface location from which drilling is commenced.

Uplift. The rising or rebound of the ground surface.

Well. Any oil or gas well, or well for the discovery or production of oil or gas, or any well on lands producing or reasonably presumed to contain oil or gas or any well drilled for the purpose of injecting fluids or gas for the purpose of stimulating or enhancing oil or gas recovery, repressuring or pressure maintenance of oil or gas

reservoirs, or disposing of oil field waste fluids or any well drilled or adjacent to an oil or gas pool for the purpose of obtaining water to be used in production stimulation or repressuring operations.

Well Stimulation Treatment. Any treatment of a well designed to enhance oil and gas production or recovery by increasing the permeability of the formation. Well stimulation treatments include, but are not limited to, hydraulic fracturing treatments and acid well stimulation treatments. Well Stimulation Treatments do not include steam flooding, water flooding, or cyclic steaming and do not include routine well cleanout work, routine well maintenance, routine removal of formation damage due to drilling, bottom hole pressure surveys, or routine activities that do not affect the integrity of the well or the formation.

SECTION 3. APPLICABILITY.

- A. Comprehensive Drilling Plan.** Prior to the submittal by each Operator of the first application for a Drilling Use Permit under these Drilling Regulations, the Operator shall submit, for review and approval by the City Council, a Comprehensive Drilling Plan. The Comprehensive Drilling Plan shall guide the development of Annual Consolidation and Drilling Plans and the issuance of Drilling Use Permits. A new Comprehensive Drilling Plan shall be required by each new or successive Operator. A previously approved Comprehensive Drilling Plan may be amended or replaced upon separate application to and approval by the City Council when conditions change.
- B. Annual Consolidation and Drilling Plan.** Prior to the end of each calendar year of the Comprehensive Drilling Plan period, Operator shall submit, for review and approval by the Community Development Director, an Annual Consolidation and Drilling Plan in accordance with the provisions of Section 31.
- C. Drilling Use Permit.** An application for a Drilling Use Permit shall be required for any Drilling Project. All Drilling Use Permits shall be consistent with the approved Comprehensive Drilling Plan and current Annual Consolidation and Drilling Plan. A Drilling Use Permit shall only be issued for drilling in accordance with these Drilling Regulations. Drilling without a Drilling Use Permit is prohibited.

SECTION 4. APPLICATION FILING, PROCESSING, REVIEW, DRILLING PLAN AMENDMENTS AND FEES.

A. Filing.

- 1. Comprehensive Drilling Plan.** A Comprehensive Drilling Plan covering the period of Oil Operations through the year 2032, shall be filed by each Operator for review and approval by the City Council, prior to the approval of any Annual Consolidation and Drilling Plan or issuance of any Drilling Use Permit. The Comprehensive Drilling Plan shall include:
 - a.** Maximum number of wells proposed to be drilled or redrilled through 2032, which shall not exceed a total of 30 wells, as well as the number of wells for planned decommissioning and abandonment;

- b. Location, extent and depth of currently known oil-producing formations and zones;
 - c. Scope, location, depth and extent of the existing and proposed Drill Sites;
 - d. Type, nature and scope of the anticipated oil recovery methods;
 - e. Size, type and location of the structures and Drilling Equipment that may be utilized in connection with Oil Operations;
 - f. Type and nature of the anticipated maintenance activities and equipment;
 - g. Description of the type, number and location of existing wells and equipment used in existing Oil Operations and proposed changes as to the type and/or future utilization of those wells within the time period covered by the Comprehensive Drilling Plan;
 - h. A surface survey, which indicates the location and number of wellheads within the Oil Field, and a plat of each sub-surface directional survey, which shall be prepared by a land surveyor or civil engineer registered in the State of California and qualified to prepare such surveys. The surveyor or civil engineer shall place a certification on the survey maps stating: "I hereby certify that I am a registered land survey (or civil engineer) of the State of California; that this map consisting of (#) sheet(s) is a true and complete survey as shown and was made by me or under my direction on (date); and accurately reflects the requirements contained in Section 42 of the Drilling Regulations." The survey shall be based on the City's GPS coordinate system and be in AutoCAD format (latest version). A digital copy of the survey shall also be submitted.
 - i. Additional information as may be required by the Community Development Director to demonstrate consistency with these Drilling Regulations and the Specific Plan. Any revisions to the Comprehensive Drilling Plan shall be reviewed and approved by the City Council in the same manner as the initial Comprehensive Drilling Plan. It is the responsibility of the Operator to establish and provide to the City Council and/or Community Development Director substantial evidence in support of the required findings, as set forth in Section 5 (Findings and Decision) below, needed to support a decision to approve a Comprehensive Drilling Plan.
2. **Annual Consolidation and Drilling Plan.** Prior to the end of each calendar year of the Comprehensive Drilling Plan period, an Annual Consolidation and Drilling Plan shall be filed by each Operator in accordance with the provisions of Section 31.
 3. **Drilling Use Permit.** An application for a Drilling Use Permit shall be completed, filed, and processed in compliance with these Drilling Regulations prior to the commencement of any Drilling Project. The application package shall include all information specified in the application and any additional information required by the Community Development Director in order to conduct a thorough review of the proposed Drilling Project.

B. Drilling Plan, Permit Application and Renewal Fees.

1. The Operator shall pay to the City at the time of the filing of an application:
 - a. A fee for the processing of the initial Comprehensive Drilling Plan, as well as a fee for processing any amended, updated or replacement Comprehensive Drilling Plan, and including payment of any applicable Specific Plan surcharge as permitted by State Law (California Government Code Section 65456) and in accordance with CCMC Section 17.570.025.
 - b. A fee for the processing of each Annual Consolidation and Drilling Plan, and including payment of any applicable Specific Plan surcharge as permitted by State Law (California Government Code Section 65456) and in accordance with CCMC Section 17.570.025.
 - c. A fee for each Drilling Use Permit or transfer of ownership, and including payment of any applicable Specific Plan surcharge as permitted by State Law (California Government Code Section 65456) and in accordance with CCMC Section 17.570.025.
 - d. Applicable fees for grading, building, mechanical, electrical, inspections, and similar construction or fire/safety inspection activities related to construction, development, operation or abandonment of any well or drill site shall apply as set forth in the City's current Fee Schedule.
2. The fees set forth in this Section shall be established by a resolution of the City Council per Section 9.G.
3. All unpaid permit fees required by these Drilling Regulations shall constitute a lien on the premises where the drilling is occurring to the extent of the Operator's interest therein.
4. The permit fees, as required in these Drilling Regulations, are in addition to any other applicable fees required by the CCMC or any costs incurred by the Oil Operator related to preparation of application materials and/or compliance with any approved Plan/Permit requirements and conditions.
5. In addition to the permit fees required by this Section 4.B, Operator shall maintain a Draw-Down Account as set forth in Section 9.A.

C. Drilling Plans, Permits and Environmental Conditions.

As a condition of approving any Comprehensive Drilling Plan or Annual Consolidation and Drilling Plan, or granting any Drilling Use Permit, the City Council or Community Development Director, as applicable, may modify any of the requirements, standards, thresholds or mitigation measures of these Drilling Regulations, or plan or study required by these Drilling Regulations or the Specific Plan, or impose additional requirements, standards, thresholds or mitigation measures as determined by the City Council or Community Development Director, as applicable, to be necessary or appropriate to adequately protect the public health, safety and welfare, and the environment from Oil Operations. The City Council or Community Development Director, as applicable, may also determine

that certain requirements, standards, thresholds or mitigation measures in these Drilling Regulations should be waived or lessened in order to avoid unintended environmental impacts. Any such modifications or substitutions shall generally be consistent with the intent and/or equivalent in scope to the requirements, thresholds or mitigation measures as approved at the time of adoption of these Drilling Regulations, the Specific Plan, the EIR or the MMRP, unless such adopted provisions are deemed obsolete or inapplicable. Modifications that could result in substantial deviations from the provisions originally adopted may be subject to subsequent review and approval through the Specific Plan amendment process and/or subsequent environmental review.

D. Notice of Drilling Plans.

1. **Comprehensive Drilling Plan.** Mailed notice shall be sent to all property owners and occupants within a 500-foot radius from the Specific Plan area boundary at least 21 calendar days prior to the date of the City Council public hearing at which the Comprehensive Drilling Plan will be considered. Notice shall be published in a newspaper of general circulation at least 14 days prior to the date of the City Council public hearing. In addition, the Community Development Director may provide additional notice, with content or using a distribution method as the Community Development Director determines is necessary or desirable (e.g., on the City's website, through the City's email notification system, etc.).
2. **Annual Consolidation and Drilling Plan.** Mailed notice shall be sent to all property owners and occupants within a 500-foot radius from the Specific Plan area boundary at least 21 calendar days prior to the anticipated date of decision by the Community Development Director. In addition, the Community Development Director may provide additional notice, with content or using a distribution method as the Community Development Director determines is necessary or desirable (e.g., on the City's website, through the City's email notification system, etc.).

E. Drilling Plan Approval and Permit Issuance.

1. The Comprehensive Drilling Plan shall be reviewed and may be approved by the City Council in accordance with the Findings set forth in Section 5.
2. All Annual Consolidation and Drilling Plans shall be reviewed and may be approved by the Community Development Director in accordance with the provisions set forth in Section 31.
3. All Drilling Use Permits shall be reviewed and may be approved by the Community Development Director in accordance with the provisions of these Drilling Regulations and the Specific Plan.
4. No Drilling Use Permit shall be issued, nor shall any construction permits be issued, until all permit fees are paid in full, the Draw-Down Account has been established, all bonds and insurance are in place and effective, and all existing Oil Operations are in substantial compliance with all conditions of existing Drilling Use Permits and all provisions of these Drilling Regulations.

- F. **Drilling** Plan Amendments. A previously approved Comprehensive Drilling Plan may be amended or replaced upon separate application to and approval by the City Council when conditions change. An application for amendment to a previously approved Comprehensive Drilling Plan shall be processed in the same manner as the original Comprehensive Drilling Plan.

SECTION 5. FINDINGS AND DECISION.

The Comprehensive Drilling Plan may be approved, with or without conditions, only after first making all of the following findings, and any additional findings as determined by the City Council to be necessary to protect the public health, safety and welfare, and the environment.

- A. The Comprehensive Drilling Plan is consistent with the provisions of these Drilling Regulations and the Specific Plan and all other applicable provisions of the CCMC.
- B. Reasonable and feasible measures were identified and required to reduce and minimize potentially significant impacts from the Oil Operations and those measures required per the adopted Mitigation Monitoring and Reporting Program (MMRP) have been incorporated into the Comprehensive Drilling Plan and its related implementation features.
- C. The Oil Operations described in the Comprehensive Drilling Plan will not be detrimental to the public interest, health, safety, or general welfare, or the environment, or injurious to persons, property, or improvements in the vicinity of and areas surrounding the Oil Field.

SECTION 6. CONDITIONS ON ASSIGNMENT OF DRILLING USE PERMIT AND DRILLING PLANS.

- A. No Drilling Use Permit issued pursuant to these Drilling Regulations may be assigned or otherwise transferred by the Operator without first notifying the Community Development Director of the proposed transfer, and submitting in writing the following information: (1) the name and address of the proposed new Operator, (2) the Operator's interest in the Drilling Project, (3) the proposed date of the transfer, (4) the name, address, phone number and email address of the proposed new Operator's agent designated for service of notices, (5) written acknowledgement by the proposed new Operator that it will be bound by, and will comply with, all provisions of these Drilling Regulations and the Specific Plan and all conditions imposed in connection with any permits, consents or approvals granted pursuant to these Drilling Regulations, and (6) information from the proposed new Operator that will satisfy the financial responsibility required by these Drilling Regulations and the Specific Plan.
- B. Prior to the Community Development Director's consideration of an assignment, a new application for a Drilling Use Permit shall be filed, and/or as appropriate an application for a new or amended Comprehensive Drilling Plan or Annual

Consolidation and Drilling Plan, and the new Operator shall be required to comply with all conditions and requirements, which are in effect at the time of assignment.

- C. Any existing Drilling Use Permit, which has been assigned or transferred contrary to the provisions of these Drilling Regulations, shall be subject to revocation by the Community Development Director.
- D. As a condition to receiving approval for a transfer, a prospective new Operator must demonstrate, to the satisfaction of the Community Development Director, a complete understanding of and ability to fully comply with all provisions of these Drilling Regulations and the Specific Plan (including but not limited to an ability to comply with all of the insurance, indemnification and other financial responsibility requirements), as well as the conditions and requirements of any Comprehensive Drilling Plan and Annual Consolidation and Drilling Plan (initial, amended or replaced) in effect at the time of transfer. No later than 90 days after the assignment or transfer, the new Operator shall provide the Community Development Director with evidence that all new Operator's personnel have received training and are capable of fully complying with all safety and environmental protection requirements.
- E. The Community Development Director may impose reasonable conditions in connection with any approval of a proposed assignment or transfer, and any such approval will not be effective unless and until the proposed new Operator(s) accepts such conditions in writing.

SECTION 7. CONDITION COMPLIANCE.

A. Condition Compliance Plan.

1. Concurrent with the submission of the Comprehensive Drilling Plan, the Operator shall submit a Condition Compliance Plan to the Community Development Director for review and approval. The Condition Compliance Plan shall detail how and when measures will be implemented to ensure effective implementation of all requirements of these Drilling Regulations, the Specific Plan and the adopted Mitigation Monitoring and Reporting Program (MMRP) and shall include a detailed description of the steps the Operator shall take to assure compliance with all provisions of the Drilling Regulations, the Specific Plan and the MMRP, including but not limited to, all of the monitoring programs for noise, vibration, odors, etc., called for by the Drilling Regulations, the Specific Plan and the MMRP.
2. The Condition Compliance Plan shall be amended as necessary, in conjunction with the Annual Consolidation and Drilling Plan, and submitted to the Community Development Director for approval. The Operator shall respond to any request for additional information by the Community Development Director within 30 days of receiving such request, unless extended by the City.
3. The Operator shall fully comply, and shall ensure that all employees and contractors fully comply, with all provisions of the approved Condition Compliance Plan.

4. The Operator shall comply with all timelines and review procedures identified in the Condition Compliance Plan. If specific timelines cannot be met as approved, no further Drilling Use Permits shall be issued until it has reached an agreement with the City on the best approach for implementing a requirement of these Drilling Regulations, the Specific Plan or the Condition Compliance Plan.
- B. On-Site Monitor.** At the City's discretion, the City may require the Operator to fund one or more persons (hereafter "On-Site Monitor") to monitor compliance with these Drilling Regulations, the Specific Plan, and/or the MMRP in connection with any aspect of the performance of oil activities under the Specific Plan. The number of On-Site Monitors shall be determined by the Community Development Director and shall take into account the scope and nature of the work to be performed. The On-Site Monitor(s) shall be knowledgeable, qualified, or certified in oil and gas production operations. The On-Site Monitor(s) shall be selected by the Community Development Director, in consultation with the Operator. The On-Site Monitor(s) shall report to the Community Development Director. The responsibilities of the On-Site Monitor(s) shall include:
1. On-site, day-to-day monitoring of construction or drilling and redrilling activities as determined by the City;
 2. Ensuring the Operator and all employees, contractors and other personnel who administer, conduct and/or carry out the Oil Field operations, have knowledge of and are in compliance with all applicable provisions of these Drilling Regulations, the Specific Plan, the approved Condition Compliance Plan and the adopted MMRP;
 3. Evaluating the adequacy of drilling and/or construction measures, and proposing improvements to the Operator and their respective contractors, and the City;
 4. Requiring correction of activities that are in violation of any provision of these Drilling Regulations, the Specific Plan, the Condition Compliance Plan or the adopted MMRP or are determined to be unsafe or dangerous conditions; and
 5. Reporting to and maintaining prompt and regular communication with the various City agencies with oversight responsibility at the project site or Oil Field, other appropriate agencies, such as DOGGR and SCAQMD, and with the Operator and personnel responsible for Operator's contractor performance and compliance.

SECTION 8. EXPIRATION, REVOCATION OR MODIFICATION OF PERMIT.

- A. To ensure continued compliance with the provisions of this Chapter, each approved Drilling Use Permit shall expire one year from the date of approval if actual drilling operations have not commenced, unless otherwise specified in the Permit.
- B. If drilling or other substantial well completion work or rework activity on a well ceases for a period of 180 days, and that well has not been completed for active

production or injection, or is not otherwise being managed as an inactive or idle well consistent with the terms and requirement under DOGGR, as determined by the Community Development Director, the Drilling Use Permit for that well shall expire. Operator shall abandon such well in accordance with Section 49, unless a new Drilling Use Permit has been obtained or the active Permit has been granted an extension.

- C. A time extension for the expiration period set forth in Section 8.A and 8.B, herein above, may be requested in writing by the Operator, accompanied by the required filing fee. The burden of proof is on the Operator to establish, with substantial evidence, that the Drilling Use Permit should be extended. Upon determination that the Operator has made a good faith effort to commence actual drilling operations, the Community Development Director may extend the time to establish an approved Drilling Use Permit up to an additional 12 months.
- D. A Drilling Use Permit may be revoked or modified by the Community Development Director in reliance on written or oral testimony or other information which, by substantial evidence, shows it is in the interest and protection of the public health, safety and welfare, and the environment, to revoke or modify the Permit.
 - 1. The Community Development Director shall hold a public hearing to determine if the Permit granted in compliance with the provisions of these Drilling Regulations should be revoked or modified. Written notice shall be mailed at least 21 days before the public hearing to the Operator and property owner, as identified in the records of the Los Angeles County Assessor, unless a more current source of this information is known.
 - 2. The Community Development Director's decision to revoke or modify a Drilling Use Permit may be appealed to the City Council by submitting a written request for appeal with the City Clerk within 15 calendar days after the decision date identified in the notice of decision. The appeal shall specifically state the pertinent facts of the case and the basis for the appeal. Appeals shall be accompanied by the filing fee established by the City Council Fee Resolution.
 - 3. Upon notification to the Operator and property owner of a revocation or modification hearing, the Drilling Use Permit shall be automatically suspended. When necessary, in order to protect the public health, safety and welfare, and the environment, an authorized City official may order all or any portion of the operations formally authorized by the Drilling Use Permit, to cease during the time of suspension.

SECTION 9. OTHER ADMINISTRATIVE ITEMS.

A. Draw-Down Account.

- 1. The Operator shall maintain an account with the City (hereinafter "Draw Down Account") from which actual costs will be invoiced and deducted for the purpose of expenses involved in the City's review, assessment, monitoring and enforcement of the permits, plans, programs, studies and surveys required by these Drilling Regulations, the Specific Plan or the MMRP. The City's Chief

Financial Officer shall maintain a transactional accounting of the Draw-Down Account, which shall be open to inspection upon the request of the Operator.

2. The Draw-Down Account will be used for covering the expense of verification of the information contained in any required applications or reports, enforcement, permitting, audits, mitigation monitoring, undertaking studies, research and inspections, administrative support, fire training and equipment, the hiring of independent consultants, and the fully burdened cost of time spent by City employees on such matters, as those costs are defined in the City's User Fees and Charges schedule as adopted by resolution of the City Council.
 3. The initial amount to be deposited by the Operator shall be determined by the City's Chief Financial Officer based on the overall cost and scope of the review, assessment, monitoring and enforcement of the permits, plans, programs, studies and surveys required by these Drilling Regulations, the Specific Plan or the MMRP.
 4. Withdrawals from the Draw-Down Account must be approved by the City's Chief Financial Officer.
 5. Whenever withdrawals from the Draw-Down Account have reduced the balance to less than 50 percent of the initial amount deposited, the Operator shall deposit supplemental funds within 30 days of the date of written notification to bring the Draw-Down Account to at least 75% of the initial amount deposited. There is no limit to the number of supplemental deposits that may be required.
 6. The City's Chief Financial Officer may, from time to time, increase the minimum amount of supplemental funds to account for inflation or the City's experience in obtaining funds from the Draw-Down Account or as to the adequacy of the funds to cover the expenses.
- B. Bond and Insurance Requirements.** No Drilling Use Permit shall be issued pursuant to these Drilling Regulations, unless the Operator has complied with and satisfied all bond and insurance requirements established by resolution of the City Council, which may be periodically updated. These bond and insurance requirements shall be in addition to all other indemnification, insurance and performance security required by federal, state, and local regulations and permits.

C. Indemnification.

1. Operator, and any approved assignee and transferee, shall indemnify, defend (with legal counsel approved by the City) and hold harmless the City, and its elected and appointed officials, officers, employees, agents, contractors and consultants from any and all claims, demands, actions, judgments, damages, injuries, losses, lawsuits and liabilities, including court costs, judgments and attorneys' fees, arising from or in any manner connected to: (a) the approval of the permits, plans, programs, studies and surveys required by the Drilling Regulations, the Specific Plan or the MMRP; (b) construction, implementation or operation of the Drilling Project covered by the Drilling Use Permit and any Oil Operations, or activities related thereto; (c) the abandonment of any wells, including the remediation related thereto; and (d) any spills or other releases of crude oil or other substances, whether liquid, gaseous or solid.

2. Operator, and any approved assignee and transferee, shall be jointly and severally responsible for the investigation, assessment, removal, treatment and remediation (collectively, "Remediation") of any substance, including, but not limited to, petroleum substances and hazardous substances (as defined in 42 U.S.C. Section 9601(14), discharged, dispersed, released, or escaped into soils, water or groundwater from or in connection with any Drilling Project, or the Oil Operations. Such Remediation shall be conducted in full compliance with all applicable City, county, regional, state and federal laws, ordinances, rules, regulations, requirements, directives and orders whatsoever, present or future, and at Operator's sole cost and expense. If Operator fails to take any action required pursuant to this Section, the City may, but shall not be obligated to, take all actions it deems appropriate with respect to the discharged, dispersed, released, or escaped substance. Operator shall reimburse the City for all expenses reasonably incurred in connection with their above described actions including, but not limited to, all direct and indirect costs relating to the Remediation. Operator's obligations under this Section extend to all properties impacted by Operator's Drilling Project, Oil Operations and other activities related thereto.
- D. Consent and Agreement.** Prior to the approval of the Comprehensive Drilling Plan, a covenant and agreement, on a form provided by the Community Development Director and in form and substance acceptable to the City Attorney, acknowledging and agreeing to comply with all terms and conditions established herein, shall be signed by the Operator and property owner(s) and recorded in the County Recorder's Office. The covenant and agreement shall run with the land and shall be binding on any subsequent Operators, owners, and tenants or occupants of any portion of the Oil Field. After recordation, a certified copy bearing the Recorder's number and date shall be provided to the Community Development Director. Such agreement shall include indemnity obligations consistent with the terms set forth in Sections 15.14.040(C)(1) and 15.14.040(C)(2) above.
- E. Costs of Implementing, Monitoring and Enforcing Conditions and Requirements.** The Operator shall be fully responsible for all reasonable costs and expenses incurred by the City or any City contractors, consultants, or employees, in implementing, monitoring, or enforcing these Drilling Regulations, the Specific Plan or the MMRP, including but not limited to, costs for permitting, permit condition implementation, mitigation monitoring, reviewing and verifying information contained in reports and plans, undertaking studies, research and inspections, administrative support, fire training and equipment, emergency response and including the fully burdened cost of time spent by City employees on such matters. Funds from the Draw-Down Account may be used to pay for such costs.
- F. Penalty for Violation of Conditions and Requirements.** At the discretion of the Community Development Director, taking into account the nature of the violation, the Operator may be subject to an amount not less than \$1000 or more than \$10,000 per day per violation. A written notice with a description of the associated penalty and required timeframe for addressing the violation will be sent to the Operator in the event of a violation. The penalties set forth in this Section are not exclusive, but shall be in addition to any other remedies available for a violation of

the CCMC. A notice of violation and related penalty may be appealed in accordance with the procedures set forth in CCMC Sections 1.02.045 and 1.02.050.

- G. Schedule of Fees.** The City may, from time to time, adopt a schedule of fees to be charged to the Operator for various activities that will be undertaken by the City pursuant to these Drilling Regulations and the Specific Plan, including, but not limited to: (1) the processing of Comprehensive Drilling Plans, Annual Consolidation and Drilling Plans and Drilling Use Permit applications as set forth in Section 4; (2) the review and processing of Abandonment Plans; (3) review of plans and studies; and (4) annual inspections of Well sites and other equipment.

H. Periodic Review.

1. The Community Development Director shall conduct a comprehensive review of the provisions of the Specific Plan, including these Drilling Regulations, at least every five years to determine if the provisions of these Drilling Regulations and the Specific Plan are adequately protecting the public health, safety and welfare and the environment. Such reviews shall, among other things, consider whether additional reasonable and feasible measures should be added, appended, modified or removed. A primary goal of the periodic review shall be to evaluate whether proven technological advances that would further reduce impacts of Oil Operations on neighboring land uses and the environment should be incorporated into the provisions of the Specific Plan or these Drilling Regulations.
2. Each review shall include a report by the Community Development Director, which shall be prepared after public notice and opportunity for public comment. The report shall include a comprehensive analysis of the effectiveness of the provisions of these Drilling Regulations and the Specific Plan, and shall review and consider enforcement activity, operational records, and any other issues relating to Oil Operations. The report, at the option of the City, may include a survey of the residents near the Oil Field regarding noise, odors, vibrations, and other issues requested by the Community Development Director. A draft of the report shall be provided to the public and the Operator for review and comment. All comments on the draft report from the public and the Operator shall be submitted to the Community Development Director in writing, and will be considered, if timely received, before the report is finalized. The final report shall include a recommendation as to whether proposed amendments to the Specific Plan, which includes the Drilling Regulations, should be submitted to the City Council.
3. At the discretion of the Community Development Director, reviews of the Specific Plan, including these Drilling Regulations, may be conducted more frequently than every five years. Without limiting such discretion, the Community Development Director shall consider whether an early review should be undertaken if more than three material violations occur within any 12-month period.
4. The initial review shall occur no sooner than three years and no later than five years after the adoption of the Specific Plan, unless the Community

Development Director determines that such initial review shall occur at an earlier time pursuant to Subsection 3 above.

- I. Regulatory Agency Records.** Operator shall provide to the Community Development Director copies of all documents Operator is required to submit to applicable regulatory agencies pertaining to Oil Field Operations, including, but not limited to DOGGR, SCAQMD, RWQCB and CEC.

SECTION 10. CONSTRUCTION AND GRADING PERMITS.

Operator shall be required to obtain the following construction and grading permits:

- A.** A construction permit for the erection of any Permanent Structure within the Oil Field area. Plans of the structure to be erected must be submitted to the City's Building Safety Division prior to a permit being issued.
- B.** A grading permit from the City's Department of Public Works for all grading, except as defined in the Grading Guidelines as adopted by the Los Angeles County Department of Public Works. Grading design and grading plan preparation shall conform to the requirements of the Los Angeles County Grading Guidelines. A site specific geotechnical investigation and hydrologic analysis may be required as described in Sections 24.B and 27, respectively.
- C.** The permits required by these Drilling Regulations are in addition to any other applicable permits required by the CCMC, including, but not limited to, building, electrical, fire and public works permits.

SECTION 11. OPERATING STANDARDS.

- A. General.** The drilling, operation and maintenance of any well, and all other operations of the Operator, shall at all times be carried on in a lawful manner, in accordance with modern approved methods and practices, which protect the public health, safety and welfare, and the environment.
- B. New Technology.** Proven reasonable and feasible technological improvements which are capable of reducing the environmental impacts of drilling and redrilling, or other oil-related operations and maintenance functions, to surrounding uses and the environment, shall be promptly implemented to the extent such technology is commercially available, not cost prohibitive and does not introduce new undesirable effects. As part of the Annual Consolidation and Drilling Plan, in accordance with Section 31, Operator shall submit a Clean Technology Assessment identifying technologies which have been achieved in practice in North America which are capable of reducing impacts in the following areas: air quality (including without limitation electrified and natural gas-powered drill rigs), groundwater quality, spill and upset prevention and containment, odors, aesthetic, noise and climate change. Such technology shall be implemented in connection with wells identified in the Annual Consolidation and Drilling Plan unless Operator demonstrates the technology is not technologically feasible or is not commercially available.

- C. Compliance with Laws and Regulations.** The Operator, including Operator's employees, contractors and other personnel who administer, conduct and/or carry out the Oil Field operations, shall comply with these Drilling Regulations, the Specific Plan, the approved Condition Compliance Plan (per Section 7.A), the adopted MMRP, and all applicable laws, regulations and standards of any local, state or federal agency related to drilling, redrilling, reworking, maintenance and production operations. In the event there are any inconsistencies between any such regulations and the provisions of the Specific Plan and/or Drilling Regulations, the more stringent requirement shall apply.
- D. Nuisance Requirements.** In the event the Oil Operations or any related work within the Oil Field area is determined by the Community Development Director to be a nuisance, or is reasonably likely to create an imminent nuisance, as defined in Chapter 9.04 of the CCMC, the City shall provide 18-hours' notice to the Operator that Oil Operations shall be suspended in a safe and controlled manner and such suspension shall continue for a length of time which is reasonable under the circumstances. Notwithstanding the foregoing, the City may require Oil Operations to be suspended immediately in the event that the City determines that such operations are causing an imminent endangerment to public health, safety or welfare, or the environment.
- E. Maintenance of Premises.** Operator shall keep and maintain all of the Oil Field area in a clean, healthy and sanitary condition in a manner consistent with the type of operation authorized, and shall fully conform to all requirements of City ordinances and regulations with respect to property maintenance.

SECTION 12. FIRE OPERATIONAL PERMIT, PROTECTION AND EMERGENCY RESPONSE.

- A. Operational Permit.** Operator shall obtain an Annual (or Temporary) Operational Permit, in accordance with the California Fire Code.
- B. On Site Fire Equipment.** Fire extinguishing equipment shall comply with all applicable fire and safety regulations, including, but not limited to, NFPA Standards, Industrial Risk Insurers (IRI) guidelines, American Petroleum Institute Industrial Labor Relations and shall be maintained in accordance with the requirements of the Fire Chief.
- C. Fire Training and Equipment.** Operator shall be responsible for costs and expenses incurred by the City, up to \$25,000 annually (to be adjusted annually each July 1st to reflect the increase in the Consumer Price Index for all Urban Consumers, Los Angeles/Riverside/Orange County Area, as established by the U.S. Department of Labor for the period from March of the preceding year through March of the current year), for training and equipment, including hazardous materials training, oil well fire suppression and spill containment training, and other related specialized training and equipment as requested by the Fire Department. In accordance with the provisions of Section 9.A, the Draw-Down Account shall be used to fund such training and equipment when requested by the Fire Chief and approved by the City's Chief Financial Officer.

D. Fire Prevention.

1. The Fire Chief may require the immediate cessation of all operations within the Oil Field whenever, in his or her judgment, a fire hazard exists, as defined in Title 19, Division 1 of the California Fire Code.
2. The Fire Chief may also require the emptying, transfer, or removal of petroleum and/or flammable materials from any tank or sump to such location as he or she deems advisable while such hazard exists.
3. It shall be unlawful for the Operator to allow flammable liquids or waste materials to flow or remain on the surface of the ground, whether within the Oil Field area or any other premises, public or private.
4. It shall be unlawful for any person to smoke or throw a burning object within 25 feet of any derrick, loading rack, tank, or sump containing petroleum or any products thereof, or any flammable liquids.

E. Audit of Fire Protection Systems and Equipment. The Fire Chief shall require the Operator to prepare, at its sole cost and expense, a review and third-party audit of fire-fighting capabilities as per the most recent NFPA requirements, California Fire Code, City Fire Code and Regulations, California Code of Regulations and API requirements. The third-party auditor shall be selected by the Operator and approved by the Fire Chief. Issues addressed shall include, but not be limited to: fire monitor placements, fire-related water capabilities, fire detection capabilities and fire foam requirements. The audit shall also include a list of any current violations on record and a corrective action plan, which shall identify each non-compliance item or other matter to be addressed, describe the corrective action to be taken, and provide a timeline for the completion of each such corrective action. The audit results and corrective action plan shall be submitted to the Fire Chief for approval within 90 days of the date of approval of the Comprehensive Drilling Plan, or at such later date as may be approved by the Fire Chief for good cause shown. Thereafter review and audits shall be required every five years. The Operator shall submit to the Fire Chief monthly updates on the corrective action plan until such time as all corrective actions have been completed. The Operator shall complete any corrective action within the approved time limits called for in the plan.

F. Spill Containment Response Personnel, Training and Equipment.

1. The Operator shall conduct within the Inglewood Oil Field annual spill containment response training and shall at all times have available sufficiently trained personnel with an adequate amount of properly maintained equipment and/or facilities so that a spill of the entire contents from the largest oil tank on the Oil Field can be responded to and contained immediately to reduce the likelihood that the spill reaches a catch basin. The content of the spill containment response training shall, at a minimum, include training for the recording of spill events (e.g. date and location of spill, estimated size of spill, all substances involved, resources deployed to respond, and containment timeframe). The spill containment equipment shall comply with the requirements of the Local California Unified Program Agency and the EPA and

be inspected by the Fire Chief to ensure that it will be effective in the event of a spill.

2. This spill containment response training and equipment required by this subsection shall be in place no later than 90 days following the date of approval of the Comprehensive Drilling Plan or at such later date as may be approved by the Community Development Director in consultation with the Fire Chief, for good cause shown.

G. Emergency Response Plan (ERP).

1. Within 180 days of the date of approval of the Comprehensive Drilling Plan, the Operator shall submit an ERP to the Fire Chief. The ERP shall include measures to protect biological species and to revegetate any areas disturbed during an oil spill or clean-up activities (see Section 29, Biological Resources). The Operator shall also ensure that the ERP satisfies all rules and regulations of the EPA, California Code of Regulations, SPCCP, the California Office of Spill Prevention and Response, and the US Department of Transportation relating to onshore pipeline spills, and shall satisfy the provisions of the adopted MMRP. Any modifications to the ERP shall be submitted to the Fire Chief. Operator shall fully implement and comply with all provisions of the ERP within 30 days following submittal of the ERP or at such later date as may be approved by the Fire Chief, for good cause shown. The Operator shall review and update the plan at least every two years to ensure the ERP is in compliance with this Section.
2. This requirement may be satisfied if the Operator can demonstrate, to the satisfaction of the Fire Chief, that an ERP is being implemented and has been approved for other parts of the Oil Field and can conclusively show that the ERP applies to the Oil Field within the jurisdiction of the City. Additional information may be required by the Fire Chief to demonstrate compliance with this Section.

H. Community Alert Notification System.

1. The Operator shall establish, maintain and test on an annual basis, a proposed Community Alert Notification System for automatic notification of area residents and businesses in the event of an emergency associated with Oil Operations that could require residents or inhabitants to take shelter, evacuate, or take other protective measures. The proposed Community Alert Notification System shall be reviewed and approved by the City's Fire and Police Chiefs.
2. The Community Alert Notification System required by this subsection shall be in place no later than 90 days following the date of approval of the Comprehensive Drilling Plan or at such later date as may be approved by the City's Fire and Police Chiefs, for good cause shown.

- I. **Annual Emergency Response Drills.** Annual Emergency Response Drills shall include the Culver City and Los Angeles County Fire Department. The Operator shall demonstrate the effectiveness of the Emergency Response Plan (ERP) by responding to one planned emergency response drill per year which shall be conducted in conjunction with the Culver City and Los Angeles County Fire

Department. Emergency response drills required by other agencies that involve Culver City and Los Angeles County Fire Departments can be used to satisfy this provision. In addition, the Operator shall demonstrate the effectiveness of the ERP by responding to not more than two unannounced drills each year, which may be called by the Fire Chief at the Inglewood Oil Field in coordination with Los Angeles County Fire Department, such that no more than two unannounced drills are conducted between both jurisdictions. If critical operations are then underway at the Oil Field, the Operator need not respond to an unannounced drill to the extent such a response would, as a result of such critical operations, create an undue risk of personal injury or property damage, but in such case, the Operator must promptly explain the nature of the critical operations, why response is not possible, and when the critical operations will be completed.

- J. Site Assessment.** In the event of a spill, leak or discharge from a tank system, pipelines or any other facility, the Fire Chief and Community Development Director shall be immediately notified. A Site Assessment shall be completed to determine and document the nature, scope and extent of the release and provided to the Community Development Director and the Fire Chief. If the Fire Chief determines that a potential fire or explosion hazard exists, the Site Assessment will be submitted to the Fire Chief within 60 days of the spill leak or discharge, in accordance with the requirements of the California Fire Code. If the spill, leak or discharge presents a potential threat to the environment, including groundwater, or human health, then the Operator shall promptly notify all appropriate local, state and federal agencies.

SECTION 13. SUMPS PROHIBITED.

It shall be unlawful for any person, firm or corporation to construct or cause to be constructed, to use or cause to be used, or to maintain or cause to be maintained, any permanent sump hereafter constructed or erected, for the purpose of storing petroleum or flammable liquids or well stimulation flowback liquids.

SECTION 14. MAJOR FACILITIES PROHIBITED.

No Major Facilities shall be constructed within the City of Culver City. Construction activities shall be limited to those necessary for new production and injection wells and associated equipment (tanks, pipes, piping components, etc.) that are needed to support access to such wells and equipment, or as needed for emergency construction activities, such as repairs after earthquakes, floods, or landslides or other catastrophic events.

SECTION 15. TANKS.

- A. API Standards.** All tanks and appurtenances shall be constructed in accordance with the API Standard Nos. 12-B, 12-D, 12-F, API 650, API 620 and as amended, and in accordance with current Fire Code, DOGGR, California Division of Industrial

Safety, EPA Standards, applicable provisions of Title 14 of the California Code of Regulations Section 1774, and applicable CalARP Program requirements.

1. The provisions of this Section shall not apply to drums constructed in accordance with the regulations of the Interstate Commerce Commission.
2. The venting provisions shall not apply to any container of 110 gallons capacity or less; providing, however, that whenever it is essential for fire safety, vents shall be maintained on containers which are permanently installed.
3. No unroofed tanks shall be used.

B. Compliance with California Fire Code. Above ground tanks shall be installed and maintained in accordance with the provisions of the California Fire Code and other applicable regulations, including foam fire protection systems when required by the Fire Chief. Prior to installation of a tank and related apparatus, Operator shall obtain an Operational Permit issued by the Fire Chief.

C. Restrictions on Size and Number of Tanks.

1. A single tank shall not exceed 5,000 barrels in capacity.
2. There shall be no more than six permanent storage tanks located on the Oil Field at any one time with a total maximum capacity of 24,000 barrels.

D. Vapor Recovery. Oil, wash, and produced water tanks shall be vapor tight and shall be equipped with a vapor recovery system.

E. Tank Piping, Valves, Fittings, and Connections. All new tank piping, valves, fittings, and connections including normal and emergency relief venting, shall be installed and maintained in accordance with current API standards to the satisfaction of SCAQMD and DOGGR.

F. Leak Detection and Control Plan. Within 180 days of the date of approval of Comprehensive Drilling Plan, or at such later date as may be approved by the City's Fire Chief, for good cause shown, the Operator shall design, implement, and comply with a Leak Detection and Control Plan, to be submitted to and approved by the Fire Chief, for controlling and detecting tank bottom leaks on all existing and new tanks. The Operator may use a combination of methods including but not limited to diversion walls, dikes, tank foundations of concrete or gravel, and a tank bottom leak detection system in compliance with Title 14 of the California Code of Regulations Section 1773, or subsequently enacted state regulations regarding tank bottom leaks. Prior to installation of newly constructed tanks, the Operator shall document its approach for identifying, monitoring, and correcting tank leaks and submit this information to the Community Development Director and Fire Chief as specified in the Drilling Use Permit.

G. Dikes and Walls Surrounding Storage Tanks. The Operator, shall construct and maintain dikes or walls around all storage tanks, clarifying tanks, or tanks used in connection with the production of oil. Dikes and walls shall be constructed and maintained to meet the standards of the NFPA and current DOGGR requirements. (See also Section 18, Dikes and Retaining Walls, and Section 20, Safety and Risk of Upset)

H. Pressure Monitoring and Venting. See Section 21.E.**SECTION 16. LOCATION OF TANKS.**

- A.** Storage tanks shall be located in conformity with the following table and as per NFPA 30 requirement, whichever is more stringent, with measurements to be taken from the shell of the tank. Where the configuration of the property will not permit the spacing requirements as identified on the following table, deviations from such requirement may be made on the written approval of the City's Community Development Director, Building Official and Fire Chief.

Tank Capacity in 42-Gallon Barrels	Distance from Nearest Tank
1 to 266	2 feet
267 to 720	3 feet
721 to 1,600	5 feet
1,601 to 2,854	6 feet
2,855 to 5,000	7 feet

- B.** No activity that creates an open flame shall be conducted within 100 feet of a storage tank containing flammable liquids, except hot work permitted by the Fire Chief under a hot work permit as defined in the California Fire Code. Where the area under ownership or control of the person, firm or corporation proposing to install or maintain any such tank does not permit the 100-foot spacing, as specified above, the location of any such tank shall be designated by the Building Official and Fire Chief, except that in no case shall the distance between any tank containing petroleum or any products, or any flammable liquids and a steam boiler or open flame be less than 25 feet.
- C.** No new storage tank shall be constructed closer than 500 feet from any Developed Area, or closer than 200 feet from a public road. No building or structure shall be constructed within 50 feet of any oil storage tank. New tanks shall be located such that they are not visible from residences, parks or other public areas and shall not be placed on ridgelines, unless the tank can be fully screened through the use of mature landscaping in accordance with an approved Landscaping Plan (Section 37.A) and the adopted MMRP.

SECTION 17. PIPING AND ELECTRICAL EQUIPMENT.

- A.** The Operator shall maintain and implement a Pipeline Management Plan that complies with the California Fire Code and DOGGR regulations. A copy of the Pipeline Management Plan shall be submitted to the Fire Chief.
- B.** All pipe and pipe fittings, including valves, gauge glass fittings, and other similar appurtenances shall be designed, installed and maintained to safely withstand the pressure to which they may be subjected.

1. All valves directly controlling the flow of flammable liquids from tanks shall be of the self-indicating type, or other type commonly used in Oil Operations, which is equally adequate or efficient. This provision shall not apply to valves less than two inches in diameter.
 2. Gauge glass fittings for tanks and for containers, sample cocks and other similar fittings intended or used for the purpose of drawing off flammable liquids from tanks and/or containers, in any quantity shall be constructed of some metal having a melting point equal to steel or higher. Brass fittings shall not be used.
 3. Gauge glass fittings shall be equipped with automatic ball checks.
- C. Any system of piping connected to a positive displacement pump shall be equipped with an automatic pressure relief valve or suitable means to relieve the pressure of any such system and prohibit such pressure from exceeding 125% of the normal safe working pressure of the piping system or pump.
- D. All electrical equipment proposed to be used or used in connection with any permit issued hereunder shall conform to the State Electrical Safety Orders of the Industrial Accident Commission, current California Electrical Code and DOGGR regulations.
- E. See also Section 20.E, Secondary Containment.

SECTION 18. DIKES AND RETAINING WALLS.

- A. It shall be unlawful for any person to use or cause to be used, or to maintain or cause to be maintained, any surface storage tank or containers located outside of any building, and in which flammable liquids, petroleum or its liquid byproducts, or liquefied petroleum gases are, or may be, placed or stored, unless such surface storage tank or container is surrounded by impervious, lined or coated masonry or reinforced concrete walls, or dikes, so designed, constructed and maintained as to confine at least 110 percent capacity of the largest tank or container within such masonry or reinforced concrete walls or dikes consistent with NFPA 30 requirements.
1. Such walls or dikes shall be increased for each additional tank or container of smaller capacity located within the same vicinity by 10% of the capacity of such additional tank or container.
 2. Such walls or dikes shall not be required for tanks of less than 2,000 gallons capacity, except where in the opinion of the Fire Chief and Public Works Director/City Engineer a potential hazardous condition exists.
- B. Any surface storage tank or container located inside of any building and in which flammable liquids are, or may be, placed or stored shall be surrounded by masonry or reinforced concrete walls or dikes so designed, constructed, and maintained as to confine the total capacity of all such tanks or containers within such masonry or reinforced concrete walls or dikes.

C. See also Section 20.E, Secondary Containment.

SECTION 19. TOILET AND WASH FACILITIES.

The Operator shall be required to provide a portable toilet for temporary employees at the Oil Field, within 200 feet of the derrick. Sanitary toilet and washing facilities shall be installed at any site where personnel are permanently stationed. Temporary and permanent facilities shall be maintained in a clean and sanitary condition at all times.

SECTION 20. SAFETY AND RISK OF UPSET.

The Operator shall at all times conduct Oil Operations in a manner that minimizes risk of accidents and the release of hazardous materials in accordance with the best available technology and safety devices for the prevention of accidents. Operator shall give written notice to the Fire Chief and Community Development Director, as well as all other required authorities, of any and all reportable accidents occurring as a result of Oil Operations or on the Oil Field site, within two working days of the accident. Failure to provide the required notice may result in revocation of the Drilling Use Permit in accordance with the provisions of Section 8. The Operator shall comply with the following provisions:

- A. Blowout Preventer.** Operator shall not drill a well without equipping such well with a blowout preventer, installed and maintained as required by DOGGR and in compliance with all safety orders of the State Division of Industrial Safety for drilling and production. Upon cementing of the surface string of casing and prior to drilling out the shoe of said string, a blowout preventer, tested and approved by DOGGR, shall be installed in accordance with the most current DOGGR requirements. Such equipment shall be capable of being operated from the driller's station and from another remote station. Redrilling, reworking and maintenance operations shall be equipped with blowout preventer equipment at the onset of operations in accordance with the most recent requirements of DOGGR. Blowout preventers shall be maintained in good condition and shall be required to be tested at intervals as requested by DOGGR. Blowout preventer flanges and kill valves at the casing head shall be kept free of fluids to allow for routine inspection at any time.
- B. Well Casings.** Operator shall equip the well with casings of sufficient strength and with safety devices in accordance with DOGGR requirements.
- C. Safety Precautions.** The Operator shall comply with all of the current safety precautions required by any State agency or the City.
- D. Belt Guards.** Belt guards shall be required over all drive belts on drilling, redrilling and reworking equipment. Guarding shall be in compliance with Title 8 of the California Code of Regulations, Section 6622, or as may be subsequently amended.
- E. Secondary Containment for Oil.**

1. The Operator shall ensure that all existing oil tanks and all new tanks have secondary containment (berms and/or walls) that can contain at least 110 percent of the largest oil tank volume for as long as necessary to respond and clean up a tank spill, in order to reduce the likelihood of oil spills entering the retention basins. In the event the Public Works Director/City Engineer determines that it would be infeasible to provide 110 percent containment for a particular oil tank (previously existing or newly installed), the Operator shall provide containment at a level determined by the Public Works Director/City Engineer to be feasible and adequate for containment.
 2. Except as provided in Section 34.E.1, all above ground piping in the Oil Field that contains or could contain oil shall be protected by basins or secondary containment measures (berms and/or walls). All new piping shall be above ground and shall have alarm sensors or another comparable system for immediately detecting leaks. All above ground piping shall be visually inspected for leaks on a daily basis. All existing underground piping shall be tested for leaks on an annual basis. Any pipes found to be leaking shall be promptly replaced with new piping meeting the requirements of these Drilling Regulations and the Specific Plan.
- F. Retention Basins.** All retention basins used in Oil Operations shall be adequately sized, sited, inspected, maintained and operated to handle a 100-year storm event to the satisfaction of the Public Works Director/City Engineer.

SECTION 21. AIR QUALITY, PUBLIC HEALTH AND CLIMATE CHANGE.

The Operator shall at all times conduct Oil Operations in accordance with the best available technology, safety devices and measures for the prevention of the release, escape, or emission of dangerous, hazardous, harmful and/or noxious gases, vapors, odors, substances or greenhouse gases, and shall comply with the following provisions:

- A. Emission Offsets.** The Operator shall obtain emission offsets or RECLAIM credits as defined and required by SCAQMD Regulations for all new or modified emission sources that require a new or modified SCAQMD permit. Proof of SCAQMD review and approval shall be submitted to the Community Development Director.
- B. Odor Minimization Plan.** Within 90 days of acceptance of the Comprehensive Drilling Plan, the Operator shall submit an Odor Minimization Plan to be reviewed and approved or conditionally approved by the Community Development Director. The Community Development Director may consult with the SCAQMD as needed in its review of the Odor Minimization Plan. The Odor Minimization Plan shall be designed to ensure protection of public health, safety and welfare; provide detailed information about the Drilling Project(s) and Oil Field and Oil Operations; specify the number, type and location of monitors that will be used; provide detailed information concerning the reliability of the instrumentation, frequency of calibration and other similar information; and address all issues relating to odors from Oil Operations. Matters addressed within the Odor Minimization Plan shall include setbacks, signs with contact information, logs of odor complaints, method of controlling odors such as flaring and odor suppressants, and the protocol for

handling odor complaints. The Odor Minimization Plan shall be reviewed by the Operator on an annual basis to determine if modifications to the Odor Minimization Plan are required and report findings to the Community Development Director. Such findings and proposed modifications to the Odor Minimization Plan shall be submitted to the Community Development Director for review and approval. Operator shall comply with all provisions of the approved Odor Minimization Plan.

C. Air Monitoring.

1. **Air Monitoring Plan.** Operator shall submit an Air Monitoring Plan to be reviewed and approved or conditionally approved by the Community Development Director. At a minimum, the Air Monitoring Plan shall address related air pollutant emissions monitoring and tracking requirements as required by SCAQMD and the MMRP, and shall include any additional reasonable measure requested by the Community Development Director to ensure protection of the public health, safety and welfare, and the environment and/or as necessary to respond to complaints or unsatisfactory monitoring results. The Air Monitoring Plan shall be designed to ensure the public health, safety and welfare, and the environment through the reduction in air toxics and odorous emissions and reduce greenhouse gas emissions from Oil Operations. The Air Monitoring Plan shall also specify the number, type and location of monitors that will be used, and provide detailed information concerning the reliability of the instrumentation, frequency of calibration and other similar information. The Air Monitoring Plan shall also be designed to assess the risk of both acute and chronic exposure to air contaminants from Oil Operations within the Oil Field, and endeavor to determine and distinguish the source of emissions, to the extent feasible, using available and affordable monitoring technology. Additionally, air monitoring may also be required, as requested by the Community Development Director, along the Outer Boundary of the Oil Field to assess the risk of both acute and chronic exposure to air contaminants from Oil Operations in the portion of the Inglewood Oil Field under the jurisdiction of Los Angeles County. During drilling, redrilling, or reworking operations, the Operator shall monitor for hydrogen sulfide and total hydrocarbon vapors as specified in the approved Air Monitoring Plan. Hydrogen sulfide shall also be monitored using mobile monitoring equipment in response to odor complaints or when onsite odors are encountered by operating personnel. Total hydrocarbon vapors shall be monitored, so as to comply with the requirements of SCAQMD Rule 1173, using mobile monitoring equipment at locations surrounding the wells, tanks, piping, piping components, etc. at the locations and frequencies, no less frequent than quarterly, that shall be specified in the approved Air Monitoring Plan. The approved monitors shall provide automatic alarms that are triggered by the detection of hydrogen sulfide or total hydrocarbon vapors at levels designated in the approved Air Monitoring Plan. For drilling, redrilling or reworking monitors, the alarms shall be audible and/or visible to the person operating the drilling, redrilling or reworking equipment. When specified alarm levels are reached, the following actions shall be taken:

- a.** At a hydrogen sulfide concentration of equal to or greater than one part per million but less than 10 parts per million, the Operator shall, immediately, and not later than 30 minutes after the alarm, investigate the source of the hydrogen sulfide emissions and take immediate corrective action to eliminate the source. The corrective action taken shall be documented in the drilling, redrilling and reworking log, or applicable inspection and maintenance logs. If the concentration is not reduced to less than one part per million within 30 minutes of the first occurrence of such concentration, the Operator shall shut down the drilling, redrilling, reworking or operations or other source in a safe and controlled manner, until the source of the hydrogen sulfide emissions has been eliminated, unless shutdown creates a health and safety hazard.
- b.** At a hydrogen sulfide concentration equal to or greater than 10 parts per million, the Operator shall promptly commence the shutdown of the drilling, redrilling, or reworking operations or other source in a safe and controlled manner until the source of the hydrogen sulfide emissions has been eliminated, unless shutdown creates a health and safety hazard. The corrective action taken shall be documented in the drilling, redrilling, or reworking log, or applicable inspection and maintenance logs. When an alarm is received, the Operator shall immediately notify, and provide access and the right to investigate the event as necessary to all agencies with jurisdiction over the Oil Field, including, but not limited to, the Culver City Fire Department, the Los Angeles County Fire Department - Health Hazardous Materials Division, DOGGR, and SCAQMD.
- c.** At a total hydrocarbon concentration equal to or greater than 500 parts per million but less than 1,000 parts per million, the Operator shall immediately investigate the source of the hydrocarbon emissions and take immediate corrective action to eliminate the source. The corrective action taken shall be documented in the drilling, redrilling, reworking or maintenance log, or applicable inspection and maintenance logs. If the concentration is not reduced to less than 500 parts per million within 30 minutes of the first occurrence of such concentration, the Operator shall shut down the drilling, redrilling or reworking in a safe and controlled manner, until the source of the hydrocarbon emissions has been eliminated, unless shutdown creates a health and safety hazard. When an alarm is received, the Operator shall immediately notify and provide access and the right to investigate the event as necessary to all agencies with jurisdiction over the Oil Field, including the Culver City Fire Department, the Los Angeles County Fire Department - Health Hazardous Materials Division, DOGGR, and SCAQMD.
- d.** At a total hydrocarbon concentration equal to or greater than 1,000 parts per million, the Operator shall promptly commence the shutdown of the drilling, redrilling or reworking operations, or other source, in a safe and controlled manner, until the source of the hydrocarbon emissions has been eliminated, unless shutdown creates a health and safety hazard. The corrective action taken shall be documented in the drilling, redrilling, reworking or maintenance log, or applicable inspection and maintenance

logs. When an alarm is received, the Operator shall immediately notify and provide access and the right to investigate the event as necessary to all agencies with jurisdiction over the Oil Field, including the Culver City Fire Department, the Los Angeles County Fire Department - Health Hazardous Materials Division, DOGGR, and SCAQMD.

- e. The Operator shall keep a record of the levels of total hydrocarbons and hydrogen sulfide detected at each of the monitors, which shall be retained for at least five years. The Operator shall notify the Fire Chief within 48 hours in the event of the occurrence of any hydrogen sulfide concentration of one part per million or more, or any total hydrocarbon concentration of 500 parts per million or more. At the request of the Fire Chief, the Operator shall make available the retained records from the monitoring equipment.

2. **City Testing.** In the event of a gas release in the Oil Field or in response to complaints received regarding odors in the Oil Field, substantiated by City personnel called to the location of the odor, the City may take grab samples of the air outside the Oil Field boundary to test for airborne toxins including hydrogen sulfide. The Operator shall be required to pay for all of the City's cost to sample the air including, without limitation, the costs to obtain vacuum canisters and teflar bags for air sampling, the costs to contract with a local laboratory to pick up the canisters and teflar bags immediately after sampling takes place and transport the samples to a laboratory for immediate analysis as required to obtain a valid and accurate test of the air and report for the presence and concentration of airborne toxins. The Operator shall also be responsible for the costs for City personnel to be trained in the proper techniques for conducting the air sampling.

- D. **Portable Flare for Drilling.** To reduce air toxics emissions, odorous substances emissions, and greenhouse gas emissions, the Operator shall have a gas buster and a portable flare, approved by SCAQMD, at the Oil Field and available for immediate use to remove any gas encountered during drilling operations from drilling muds prior to the muds being sent to the shaker table, and to direct such gas to the portable flare for combustion. The portable flare shall record the volume of gas that is burned in the flare. The volume of gas burned in the flare shall be documented in the drilling log. The Operator shall notify the Fire Chief and SCAQMD within 48 hours in the event gas is burned by the flare, and shall specify the volume of gas that was burned in the flare. No drilling or redrilling shall be conducted in areas that are known to penetrate the Nodular Shale zone, or where pressurized methane is known or reasonably suspected to exist, unless a fully operational and properly maintained gas buster and portable flare are installed on the rig. All other drilling and redrilling operations shall be conducted so that any measurable gas that is encountered can, and will, be retained in the well bore until the gas buster and portable flare are installed on the rig, after which the gas will be run through the system. The Operator shall immediately notify the Fire Chief and SCAQMD in the event any gas from drilling or redrilling operations is released into the atmosphere without being directed to and burned in the flare.

- E. **Oil Tank Pressure Monitoring and Venting.** All oil tanks that contain or could contain oil shall have a fully operational pressure monitoring system, of a type and

design approved by the Fire Chief that continuously measures and digitally records the pressure in the vapor space of each tank. The detection system shall notify the Operator via an alarm when the pressure in the tank reaches within 10 percent of the tank relief pressure. In the event of an alarm, the Operator shall immediately take corrective action to reduce the tank pressure. The corrective action shall be documented in the applicable inspection and maintenance log. The Operator shall notify the Fire Chief and SCAQMD within 24 hours if the pressure in any tank covered by this Subsection ever exceeds such tank's relief pressure or if the hatches on the tank(s) have lifted and allowed gas to vent to atmosphere. Within seven calendar days after any tank vapor release, the Operator shall submit a report of the incident to SCAQMD as a breakdown event pursuant to Rule 430, and shall provide the Fire Chief with a written report of the event and the corrective measures undertaken and to be undertaken to avoid future oil tank vapor releases. The Operator shall make any changes to such report that may be required to obtain approval from the Fire Chief and SCAQMD, shall promptly institute all corrective measures called for by the report, and shall report the completion of the corrective measures to the Fire Chief and the Community Development Director within one week of their completion.

- F. Odor Suppressant for Drilling and Redrilling Operations.** The Operator shall use an odor suppressant spray system on the mud shaker tables for all drilling, redrilling, well stimulation and well reworking operations that use mud shaker tables, or equivalent, to ensure that no odors from such operations can be detected at the Outer Boundary of the Oil Field. In addition, an automatic electronic alarm shall be installed at the tank relief outlets (vents) to notify the Operator if any release occurs.
- G. Closed Systems for Produced Oil and Water.** The Operator shall ensure all produced water and oil associated with production, processing, and storage, except produced water and oil used for sampling only, are contained within closed systems, as defined in the current California Fire Code, at all times.
- H. Off-Road Diesel Construction Equipment Engines.** All off-road diesel construction equipment shall comply with the following provisions:
 - 1. Utilize CARB/EPA Certification Tier 3 or better certified engines for engines below 750 horsepower and Tier 2 engines for engines at or above 750 horsepower or other methods approved by CARB as meeting or exceeding the Tier 2 or Tier 3 standards.
 - 2. Utilize a CARB Verified Level 3 diesel catalyst. The catalyst shall be capable of achieving an 85 percent reduction for diesel particulate matter. Copies of the CARB verification shall be provided to the Community Development Director. Said catalysts shall be properly maintained and operational at all times when the diesel engines are running. CARB Verified Level 3 catalysts are not required for engines that meet Tier 4 standards.
- I. Drill Rig Engines.** All drilling, redrilling, reworking and maintenance rig diesel engines, except rigs powered by on-road engines, shall comply with the following provisions:

1. Utilize CARB/EPA Certification Tier 2 or better certified engines or other methods approved by CARB as meeting or exceeding the Tier 2 standard.
 2. Utilize second generation heavy duty diesel catalysts capable of achieving 90 percent reductions for hydrocarbons and for particulate matter smaller than 10 microns. Said catalysts shall be properly maintained and operational at all times when the diesel engines are running.
 3. Utilize Clean Technologies such as natural gas-powered drill rigs or other engine technologies that are capable of reducing environmental impacts in comparison to the requirements set forth in Subsections 15.14.100.I.1 and 15.14.100.I.2, hereinabove, when such technologies have been determined to be feasible and commercially available through a Clean Technology Assessment in the Annual Consolidation and Drilling Plan.
- J. Drilling and Redrilling Setbacks.** The following setbacks shall apply within the Oil Field for drilling or redrilling:
1. **Drilling.**
 - a. At least 400 feet from Developed Areas.
 - b. At least 75 feet from any public roadway.
 - c. The Top Hole well hole setbacks prescribed in this subsection may be reduced at the discretion and approval of the City Council if it can be determined the setback reduction will not be detrimental to the public health, safety or welfare, or the environment.
 - d. As part of the Annual Consolidation and Drilling Plan (Section 31.B) the Operator shall provide an inventory of existing wells that encroach into the setback area specified above. Said inventory shall also include an estimated schedule for properly abandoning the wells encroaching into the setback area, based upon their respective current productive life without redrilling.
 2. **Slant Drilling.** The Operator shall employ slant drilling whenever feasible to do so in order to locate the Top Hole as far from Sensitive Developed Areas as may be reasonably necessary to mitigate impacts.
 - a. **Deep-Zone Wells.** If the Operator intends to drill Deep-Zone Wells where the Top Hole is closer than 800 feet to a Sensitive Developed Area then the Operator shall prepare and receive approval for a Deep-Zone Supplement to the Annual Consolidation and Drilling Plan, as required by Section 31.C.
 - b. **Mid-Zone Wells.** If an Operator intends to drill Mid-Zone Wells where the Top Hole is closer than 800 feet to a Sensitive Developed Area then the Operator shall prepare and receive approval for a Mid-Zone Supplement to the Annual Consolidation and Drilling Plan, as required by described in Section 31.C.

K. Fugitive Dust Control Plan. Within 120 days following the date of approval of the Comprehensive Drilling Plan, or at such later date as may be approved by the Public Works Director/City Engineer for good cause shown, Operator shall submit a Fugitive Dust Control Plan to the Public Works Director/City Engineer for review. The Fugitive Dust Control Plan shall comply with all requirements of SCAQMD Rule 403 and shall cover all existing operations and any future projects that may or may not require a grading permit. The Operator shall review the Fugitive Dust Control Plan every five years and incorporate any modifications deemed necessary due to amendments to SCAQMD Rule 403 or as required by the City. Any revisions to the Fugitive Dust Control Plan shall be reviewed and approved by the Public Works Director/City Engineer. The plan shall include consideration of the following measures, other measures listed in SCAQMD Rule 403, Tables 1 through 3, and other measures at the discretion of the Public Works Director/City Engineer.

1. Application of water at least every four hours, or more frequently if conditions so require, to the area within 100 feet of a structure being demolished, to reduce vehicle trackout, and to other actively disturbed areas within a construction site;
2. Application of CARB-precertified, or equivalently effective, non-toxic soil binders to disturbed areas upon completion of demolition;
3. Application of water to disturbed soils after demolition is completed or at the end of each day of cleanup;
4. Prohibition against demolition activities when wind speeds exceed 25 mph;
5. Requirement of minimum soil moisture of 12% for earthmoving by use of a moveable sprinkler system or a water truck. Moisture content can be verified by lab sample or moisture probe;
6. Requirement that all trucks hauling dirt, sand, soil, or other loose materials are to be tarped with a fabric cover and maintain a freeboard height of 12 inches;
7. When backfilling, mix backfill soil with water prior to moving, dedicate water truck or high capacity hose to equipment, minimize drop height from loader bucket and empty loader bucket slowly;
8. Requirement of paved interior roads to be at least 100 feet long, 12 feet wide per lane and edged by rock berm or row of stakes, or addition of four-foot shoulder for paved roads;
9. Limit vehicular traffic to established paved and unpaved roads and parking areas;
10. Requirement that maximum speed on unpaved roads be limited to 15 miles per hour;
11. Implementation of watering three times a day for active unpaved roads, or more often as necessary to ensure that no visible emissions occur during unpaved road travels. As an alternative to watering, unpaved roads may be treated with CARB-precertified, or equivalently effective, non-toxic soil binders in a manner and at a frequency based on manufacturer recommendations;

12. Application of CARB-precertified, or equivalently effective, non-toxic soil binders annually to unpaved parking areas;
 13. Application of CARB-precertified, or equivalently effective, non-toxic soil binders, or daily watering, or installation of temporary coverings to storage piles;
 14. Application of CARB-precertified, or equivalently effective, non-toxic soil binders on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days);
 15. Planting of tree windbreaks, consistent with the approved Landscaping Plan or installation of engineered windbreaks, such as wind fences, on the windward perimeter of construction projects if adjacent to open land;
 16. Planting of vegetative ground cover in disturbed areas, consistent with the approved Landscaping Plan, as soon as possible;
 17. Installation of a track-out control device to reduce mud/dirt track out from unpaved truck exit routes that exit onto City streets, that may be any or a combination of the three following options: (a) wheel washers where vehicles enter and exit unpaved areas onto paved roads, or requirement to wash off trucks and any equipment leaving the site each trip; (b) pipe-grid track-out-control device; or (c) installation of gravel bed track-out apron (three inches deep, 25 feet long, 12 feet wide per lane and edged by rock berm or row of stakes). Additionally, any visible track-out onto City streets caused by Oil Operations will be swept using water-based sweepers at least once a day; and
 18. Limit construction projects or schedule them to the extent possible so that they are not concurrent to prevent grading at multiple locations within the Oil Field.
- L. Inspection and Maintenance Program Information.** Upon request and reasonable prior notification, the Operator shall make available for inspection by City staff all required SCAQMD, CARB, and EPA inspection and maintenance program records. This requirement applies to all sites subject to SCAQMD, CARB, and EPA inspection and maintenance programs within City limits.
- M. Greenhouse Gas Recordkeeping and Cap and Trade Program Information.** Upon request, the Operator shall make available for inspection by City staff all required CARB and EPA greenhouse gas inventories and inventory verifications that include emission from activities within the Oil Field, and CARB Cap and Trade program compliance documentation.

SECTION 22. NOISE ATTENUATION.

All Oil Operations shall be conducted in a manner that implements and is consistent with the best available measures for the prevention of excessive and annoying noise, and shall comply with the following provisions:

A. Noise Limits.

1. All Oil Operations on the Oil Field shall comply with the noise provisions of the CCMC Title 9, Chapter 9.07 (Noise Regulations), except as specifically exempt and otherwise regulated by these Drilling Regulations, the Specific Plan or the MMRP. In the event there are any inconsistencies between Chapter 9.07 and the provisions of these Drilling Regulations, the Specific Plan or the MMRP, these Drilling Regulations, the Specific Plan and the MMRP shall take precedence for Oil Operations.
2. Hourly, A-weighted equivalent noise levels associated with well drilling, redrilling, reworking and maintenance shall not elevate existing baseline levels by more than five dBA during daytime hours (7:00 am to 10:00 pm).
3. Operator shall limit the night time (10:00 p.m. to 7:00 a.m.) noise levels at any sensitive receptor to no more than three dBA above a one-hour baseline average for the defined nighttime period. If Operator violates the above noise requirements, Operator shall identify the source of the noise and take steps necessary to assure compliance with this subsection.
4. If well drilling, redrilling, reworking and maintenance operations elevate nighttime baseline noise levels by more than 10dBA for more than 15 minutes in any one hour, as independently verified and determined by the City, the Operator, in consultation with the City, shall identify the cause and source of the noise and take steps to avoid such extended periods of noise elevation in the future.
5. Noise produced by Oil Operations shall include no pure tones when measured beyond the Outer Boundary.

B. Backup Alarms. Backup alarms on all vehicles operating within the Oil Field shall be disabled between the hours of 8:00 p.m. and 8:00 a.m. During periods when the backup alarms are disabled, the Operator shall employ alternate, low-noise methods for ensuring worker safety during vehicle backup, such as the use of spotters.

C. Quiet Mode Drilling Plan. Concurrent with the submission of the Comprehensive Drilling Plan, the Operator shall submit to the Community Development Director for review and approval a Quiet Mode Drilling Plan that would apply between the hours of 6:00 p.m. and 8:00 am. All Oil Operations shall be conducted in conformity with the Quiet Mode Drilling Plan that has been reviewed and approved by the Community Development Director. The Quiet Mode Drilling Plan shall be reviewed by the Operator on an annual basis to determine if modifications to the Quiet Mode Drilling Plan are required and report findings to the Community Development Director. Such findings and the modified Quiet Mode Drilling Plan shall be submitted to the Community Development Director for review and approval. Operator shall comply with all provisions of the approved Quiet Mode Drilling Plan, which shall include, but is not limited to the following:

1. Installation of noise barriers.

2. Personnel shall take particular care when standing back while tripping out of hole to ensure that there is minimal clanging of pipe.
 3. While tripping in the hole, steps shall be taken to ensure that the blocks are completely stopped prior to latching the elevators.
 4. Whenever latching the elevators, personnel shall lay the pipe in the elevators and latch slowly and as quietly as possible.
 5. When handling drill pipe or casing, personnel shall use measures that will prevent hitting the pipe against the cat walk, v-door or other surfaces that would create loud noise.
 6. Rubber shall be required on the v-door when picking up pipe.
 7. Personnel shall place rubber or wood on the catwalk when rolling pipe off the pipe racks onto the catwalk.
 8. Steps shall be taken to minimize any banging of pipe on the catwalk by careful use of the forklift.
 9. Hammering on or racking of pipe shall be not permitted.
 10. Operation of the well cellar pump shall not be permitted.
 11. Yelling to other on-location personnel shall not be permitted. Derrick personnel and the driller shall communicate with walkie talkies.
 12. Horns shall not be used to give signals, except in the event of an emergency.
 13. Any other additional information required by the Community Development Director.
- D. Engines.** Critical grade or better exhaust muffler systems shall be used to reduce noise from diesel drilling rig engines. All other equipment powered by internal combustion engines shall use residential grade or better exhaust muffler systems to reduce noise.
- E. Equipment Servicing.** All noise producing Oil Field equipment shall be regularly serviced and repaired to minimize increases in pure tones and other offensive noise output over time and to ensure that tonal and other offensive noise from worn bearings, metal-on-metal contact, valves and other equipment does not cause perceptible tonal or other offensive noise beyond the Outer Boundary. The Operator shall maintain an equipment service log for all noise-producing equipment, which shall be subject to inspection by the City.
- F. Deliveries.**
1. Except as provided in Section 22.F.2, deliveries shall not be permitted after 8:00 p.m. and before 7:00 a.m. except in cases of emergency. Deliveries on Sundays or legal holidays shall not be permitted after 8:00 p.m. and before 9:00 a.m., except in cases of emergency.
 2. Deliveries within 500 feet of any residential property shall not be permitted after 5:00 p.m. and before 7:00 a.m. except in cases of emergency. Deliveries on

Sundays or legal holidays shall not be permitted after 5:00 p.m. and before 9:00 a.m., except in cases of emergency or as approved by the Community Development Director.

- G. Time Limits for Construction.** Construction of permanent structures shall not be permitted after 7:00 p.m. and before 7:00 a.m., or during Saturdays, Sundays, or legal holidays, except in cases of emergency or as approved by the Community Development Director.
- H. Construction Equipment.** All construction equipment shall be selected for low-noise output. All construction equipment powered by internal combustion engines shall be properly muffled and maintained. The Operator shall maintain an equipment service log subject to inspection by the Public Works Director/City Engineer.
- I. Construction Equipment Idling.** Unnecessary idling of construction equipment internal combustion engines is prohibited.
- J. Worker Notification.** The Operator shall instruct employees and subcontractors about the noise provisions of these regulations prior to commencement of each and every drilling, redrilling, reworking, construction and maintenance operation, and shall annually certify to the Public Works Director/City Engineer that such employees and subcontractors have been properly trained to comply with such noise provisions. The Operator shall prominently post quiet mode policies at every drilling and redrilling site.
- K. Noise Monitoring and Reporting.** The Operator shall employ an independent qualified acoustical engineer, approved by the Public Works Director/City Engineer to install equipment to continuously monitor and digitally record noise levels at and near the Oil Field or Drilling Project location. Such monitors shall be placed at locations and for the frequency and duration identified by the Public Works Director/City Engineer, and shall include adjacent sensitive receptor locations and at locations where complaints were received regarding Drilling Project activities. The results of all monitoring shall be submitted to the Public Works Director/City Engineer on a quarterly basis. The monitoring required by this subsection shall be implemented no later than 180 days following the date of approval of the Comprehensive Drilling Plan or at such later date as may be approved by the Public Works Director/City Engineer, for good cause shown.

SECTION 23. VIBRATION REDUCTION.

All Oil Operations shall be conducted in a manner that minimizes vibration, and shall comply with the following provisions:

- A.** Vibration levels from Oil Operations shall not exceed a velocity of 0.25 mm/s over the frequency range 1 to 100 Hz at the Outer Boundary.
- B.** Should vibration levels at any time exceed the thresholds specified above, or should the Operator otherwise fail to comply with all of the provisions specified herein, the Operator shall immediately notify the City and shut down the source of

drilling and redrilling found to be in non-compliance with the thresholds specified in these Drilling Regulations, the Specific Plan and/or the EIR/MMRP, and no new drilling or redrilling activities may be commenced or approved until the Operator has taken all steps necessary to assure future compliance with the thresholds and other provisions. The foregoing remedies are not exclusive, but shall be in addition to any other remedies available for a violation of the CCMC.

- C. Vibration Reduction Monitoring and Reporting.** The Operator shall hire an independent qualified engineer, approved by the Public Works Director/City Engineer, to install equipment to continuously monitor and digitally record vibration levels at the Outer Boundary. Such monitors shall be placed at locations selected by the Public Works Director/City Engineer and shall be implemented no later than 180 days following the date of approval of the Comprehensive Drilling Plan, except as may be extended for good cause as determined by the Public Works Director/City Engineer. The results of all such monitoring shall be submitted to the Public Works Director/City Engineer on a quarterly basis.

SECTION 24. GEOTECHNICAL.

Operator shall comply with the following provisions:

- A. Review.** All proposed grading shall be subject to prior review and approval by the Public Works Director/City Engineer.
- B. Geotechnical Investigation.** A site-specific geotechnical investigation shall be completed for permanent structures and for grading in excess of 1,000 cubic yards. The Public Works Director/City Engineer may waive this investigation requirement for grading involving between 1,000 and 5,000 cubic yards if there are no permanent structures proposed and grading would not create slopes higher than five feet. The investigation shall be completed by a licensed California Engineering Geologist and licensed California Geotechnical Engineer and submitted to the Public Works Director/City Engineer for review and approval. The following items must be addressed in the geotechnical investigation.
1. No slope of cut or fill shall have a gradient steeper than two to one (horizontal to vertical) unless specifically approved by a site-specific geotechnical report.
 2. Erosion shall be controlled on all slopes and banks so that no sediment or other substances are washed onto public streets or surrounding property. Such control measures may consist of planting and irrigation, dams, cribbing, riprap, sand bagging, netting, berms, or other devices.
 3. Cuts and fills shall be minimized to avoid erosion and visual impacts.
 4. Slopes shall be restored to their original grade within 30 days of the discontinuance of the use, unless extended by the Public Works Director for good cause shown.
- C. Accumulated Ground Movement Plan.** Within 180 days of the date of approval of the Comprehensive Drilling Plan or at such later date as may be approved by the Public Works Director/City Engineer, for good cause shown, the Operator shall

submit an Accumulated Ground Movement Plan, including subsidence and uplift, which addresses post-Baldwin Hills Reservoir failure studies to be reviewed and approved by the Public Works Director/City Engineer. The Plan shall identify all measurement locations that will be used and shall include points within and beyond the Oil Field. Measurement locations shall extend a minimum of 1,000 feet beyond the horizontal limit of proposed Bottom Holes. Use of existing measurement locations within the Los Angeles County portion of the Oil Field may be included within the Plan. The Plan shall include both vertical and horizontal ground movement, and shall utilize Global Positioning System technology, as well as any other survey methods deemed appropriate by the Public Works Director/City Engineer to provide the level of accuracy required in monitoring ground movement. The Plan shall identify a monitoring period that extends five years after the end of Oil Operations. The Operator shall promptly address any changes, additions, revisions or modifications that may be required to receive the approval of the Plan by DOGGR and the Public Works Director/City Engineer. This requirement may be satisfied if the Operator can demonstrate, to the satisfaction of the Public Works Director/City Engineer, that an Accumulated Ground Movement Plan that meets these requirements is being implemented and has been approved for other parts of the Inglewood Oil Field and can conclusively show that the Accumulated Ground Movement Plan applies to the Oil Field within the jurisdiction of the City. Additional information may be required by the Public Works Director/City Engineer to demonstrate compliance with this Section.

- D. Accumulated Ground Movement Survey.** Within 60 days of approval of the Accumulated Ground Movement Plan required in Section 24.C, above, the Operator shall implement the Accumulated Ground Movement Survey as described in the approved Accumulated Ground Movement Plan. For drilling proposed within the Oil Field, the Operator must submit the results of the Accumulated Ground Movement Survey to the Public Works Director/City Engineer. The study shall be prepared by a licensed expert approved or selected by the Public Works Director/City Engineer, for determining annual ground movement, including subsidence or uplift. The Accumulated Ground Movement Survey results shall identify ground movement during this first study period, including subsidence or uplift, and include a description of how future ground movement survey results will be analyzed and reported. Measurements shall be made using repeat pass Differentially Interferometric Synthetic Aperture Radar technology to establish baseline conditions, since the post-Baldwin Hills Reservoir failure, to measure future ground movement. Within 30 days of completing the Accumulated Ground Movement Survey, the results of the annual monitoring survey shall be forwarded to DOGGR for review and appropriate action and to the Public Works Director/City Engineer for review and comment, and the Operator shall see that any changes, additions, revisions or modifications that may be required to receive the approval of such agencies are promptly made and approved. Annual survey reports shall be submitted for a minimum of five years after cessation of Oil Operations and the fifth report shall provide conclusions and recommendations regarding the need for continued surveying and reports. If an annual study is not approved, the Operator shall promptly take such actions as are necessary to obtain approval. This requirement may be satisfied if the Operator can demonstrate to the satisfaction of the Public Works Director/City Engineer, that an annual Accumulated Ground

Movement Survey that meets these requirements is being implemented and has been approved for other parts of the Oil Field and can conclusively show that the annual Accumulated Ground Movement Survey applies to the Oil Field within the jurisdiction of the City. Additional information may be required by the Public Works Director/City Engineer to demonstrate compliance with this Section.

- E. Ground Movement Threshold Limits.** In the event that the annual monitoring surveys indicate that ongoing ground movement deviates from the baseline measurements, as established by the Accumulated Ground Movement Plan and the initial Accumulated Ground Movement Survey (as required per Section 24.C and 24.D, respectively), by a measurement equal to or greater than 0.6 inches or a lesser value determined by the Public Works Director/City Engineer, at any given location is occurring in an upward or downward direction in the vicinity of or in the Oil Field, the Operator shall review and analyze all claims or complaints of Subsidence damage that have been submitted to the Operator or the City by the public or a public entity in the 12 months since the last ground movement survey. Based on this information, the Operator shall prepare a report that assesses whether any of the alleged subsidence damage was caused by Oil Operations and submit said report to DOGGR and the Public Works Director/City Engineer.
1. No further drilling or redrilling shall be commenced or approved, until the cause of the movement has been determined.
 2. If the Operator's operations are the cause or a contributing factor, no further drilling or redrilling shall be commenced or approved until a remedy, such as adjustments in ground water flood operations, has been fully implemented to alleviate the ground movement to the satisfaction of DOGGR and the Public Works Director/City Engineer.
 3. Injection pressures associated with secondary recovery operations shall not exceed reservoir fracture pressures as specified in California Code of Regulations Title 14, Division 2, Section 1724.10, and as approved by DOGGR.
- F. Fault Investigation Report.** Tanks or other permanent structures shall not be constructed across an active fault or within the Alquist-Priolo Earthquake Fault Zone without preparation of a Fault Investigation Report by a California Certified Engineering Geologist, to be reviewed and approved by the Building Official.
- G. Seismic Activity Tracking System.** Within 180 days of the date of approval of the Comprehensive Drilling Plan or at such later date as may be approved by the Public Works Director/City Engineer, for good cause shown, the Operator must demonstrate ability to track and record seismic activity relating to Oil Operations by using a fully operating and properly maintained accelerometer (in coordination with the Cal Tech Seismological Laboratory). The accelerometer data shall be used to determine site-specific ground accelerations as a result of any seismic event in the region (Los Angeles/Orange County and offshore waters of the Santa Monica Bay and San Pedro Channel). Readings from the accelerometer shall be recorded and transmitted in real-time to the California Integrated Seismic Network. The Operator shall cease operations and inspect all pipelines, tanks, and other infrastructure following any seismic event that exceeds a ground acceleration of 13 percent of gravity (0.13 g). The Operator shall promptly notify the Public Works Director/City

Engineer if there is a seismic event that necessitates the ceasing of operations. The Operator shall not reinstitute operations and use of associated pipelines until all infrastructure is structurally sound as determined by DOGGR and the Public Works Director/City Engineer in consultation with the Operator. Documentation of this requirement shall be submitted with each Annual Drilling Plan.

H. Erosion Control Plan. Within 180 days of the date of approval of the Comprehensive Drilling Plan or at such later date as may be approved by the Public Works Director/City Engineer, for good cause shown, Operator shall develop and submit for review and approval by the Public Works Director/City Engineer an Erosion Control Plan. All grading and other Drilling Project activities shall be in complete conformity with the approved Erosion Control Plan.

1. The Erosion Control Plan shall include, but is not limited to, the following measures:
 - a. Graded areas shall be stabilized with riprap (i.e., crushed stone) or other ground cover as soon as grading is completed. The surface of slopes shall be roughened during the construction period to retain water, increase infiltration, and facilitate establishing vegetation. Tracked machinery shall be operated up and down (parallel with) slopes to leave horizontal (perpendicular) depressions in the soil, which run across the slope, on the contour;
 - b. Slope breaks, such as diversions, benches, or contour furrows shall be constructed to reduce the length of cut- and fill-slopes, thus limiting sheet and rill erosion and preventing gully erosion;
 - c. Sediment barriers shall be used around construction areas to retain soil particles on-site and reduce surface runoff velocities during rainfall events. Sediment barriers could include straw bales, silt fences, and gravel and earth berms. Silt fences shall be placed on slope contours in areas where shallow overland flow is anticipated;
 - d. Temporary and permanent drainages shall be employed, as necessary, to reduce slope erosion and prevent damage to construction areas. Sheet flow across or toward a disturbed area shall be intercepted and conveyed to a low to moderate gradient (1 to 5 percent slope) sediment basin, erosion-resistant drainage channel, or a level, well-vegetated area. Drainages include swales, diversion dikes, and slope drains; and
 - e. Waterbars, rolling dips, and outsloping roads shall be constructed as part of new road construction to disperse runoff and reduce the erosive forces associated with concentrated flows.
2. This requirement may be satisfied if the Operator can demonstrate, to the satisfaction of the Public Works Director/City Engineer that an Erosion Control Plan is being implemented and has been approved for other parts of the Oil Field and can conclusively show that the Erosion Control Plan that meets these requirements applies to the Oil Field within the jurisdiction of the City. Additional information may be required by the Public Works Director/City Engineer to demonstrate compliance with this Section.

- I. **Slope Restoration.** Slopes shall be restored to their original grade, to the satisfaction of the Public Works Director/City Engineer, once the use that required the grading of the slope has been discontinued. However, if restoration of a slope would negatively affect existing drainage patterns or slope stability, then the slope shall be restored to a grade that avoids these negative effects, as determined by the Public Works Director/City Engineer.

SECTION 25. GROUNDWATER MONITORING.

Within 180 days of the date of approval of the Comprehensive Drilling Plan or at such later date as may be approved by the Public Works Director/City Engineer, for good cause shown, the Operator shall develop, implement, and carry out a Groundwater Monitoring Program for the Drilling Project site or Oil Field, which shall be submitted to the Public Works Director/City Engineer. The Operator's Groundwater Monitoring Program shall be consistent with all requirements of the RWQCB, and shall be submitted to the Water Replenishment District of Southern California, the West Basin Municipal Water District, and Golden State Water Company for review. Pursuant to the approved Program, the Operator shall install and maintain groundwater monitoring wells in the vicinity of each surface water retention basin, which is permitted by the RWQCB. Such monitoring wells shall be completed to the base of the permeable, potentially water-bearing, alluvium, Lakewood Formation, and San Pedro Formation, and to the top of the underlying, non-water bearing Pico Formation, as determined by a licensed California Engineering Geologist to be approved by the Public Works Director/City Engineer. The Program shall address water level and water quality, and shall include deep zone water level monitoring within the Pico Formation and other cap rock units on the west side of the Newport Inglewood Fault Zone. The RWQCB and the Public Works Director/City Engineer shall be advised of the results of such monitoring on a quarterly basis and shall be immediately advised if such monitoring indicates a potential problem. This requirement may be satisfied if the Operator can demonstrate, to the satisfaction of the Public Works Director/City Engineer, that a Groundwater Monitoring Program that meets these requirements is being implemented and has been approved for other parts of the Oil Field and can conclusively show that the Groundwater Monitoring Program applies to the Oil Field within the jurisdiction of the City. Additional information may be required by the Public Works Director/City Engineer to demonstrate compliance with this Section.

SECTION 26. SURFACE WATER MANAGEMENT.

Within 180 days of the date of approval of the Comprehensive Drilling Plan or at such later date as may be approved by the Public Works Director/City Engineer, for good cause shown, the Operator shall submit a Surface Water Management Plan, to be reviewed and approved by the Public Works Director/City Engineer, that documents best water management practices. Any modifications to the Surface Water Management Plan shall be submitted to the Public Works Director/City Engineer for review and approval.

- A. The Surface Water Management Plan shall include, but is not limited to the following:
1. Water conservation measures;
 2. Provisions for the use of a drip irrigation system;
 3. Provisions for the use of surface water runoff in the retention basins for dust suppression and landscaping;
 4. Provisions prohibiting the use of Produced Water from Wells that have undergone a Well Stimulation Treatment for the purpose of irrigation.
 5. Provisions addressing the availability of reclaimed water at the Drilling Project site and use of such water to the greatest extent technically feasible if and when it becomes available; and
 6. Any additional information required by the Public Works Director/City Engineer.
- B. Once a Drilling Use Permit is approved, the Operator and Public Works Director/City Engineer shall review the Surface Water Management Plan every three years to determine if modifications are required.
- C. If a source of reclaimed water should become available in subsequent years, the Operator shall be required to modify the Plan to accommodate the use of reclaim water to the greatest extent technically feasible.
- D. This requirement may be satisfied if the Operator can demonstrate, to the satisfaction of the Public Works Director/City Engineer, that a Surface Water Management Plan that meets these requirements is being implemented and has been approved for other parts of the Oil Field and can conclusively show that the Surface Water Management Plan applies to the Oil Field within the jurisdiction of the City. Additional information may be required by the Public Works Director/City Engineer to demonstrate compliance with this Section.

SECTION 27. STORMWATER AND DRAINAGE MANAGEMENT.

- A. **Stormwater Pollution Prevention Plan (SWPPP).** The Operator shall at all times maintain and implement all provisions of a SWPPP that has been inspected by the RWQCB and the Public Works Director/City Engineer. Concurrently with the submission of the Comprehensive Plan, and updated annually with each Annual Consolidation and Drilling Plan, the Operator shall provide the Public Works Director/City Engineer with a copy of the SWPPP, and any future modifications, revisions, alterations, or replacements. This requirement may be satisfied if the Operator can demonstrate, to the satisfaction of the Public Works Director/City Engineer, that a SWPPP is being implemented and has been approved for other parts of the Inglewood Oil Field and can conclusively show that the SWPPP applies to the Oil Field within the jurisdiction of the City. Additional information may be required by the Public Works Director/City Engineer to demonstrate compliance with this Section.

- B. Spill Prevention, Control, and Countermeasure Plan (SPCCP).** The Operator shall maintain and implement all provisions of a SPCCP, which meets the requirements of the Local California Unified Program Agency and any other applicable laws or regulations. Concurrently with the submission of the Comprehensive Drilling Plan, the Operator shall provide the Fire Chief with a copy of the SPCCP. Any future modifications, revisions, alterations, or replacements to the SPCCP (to be reviewed at least biennially) shall be submitted to the Fire Chief.
- C. Hydrologic Analysis.** A site-specific hydrologic analysis shall be completed to evaluate anticipated changes in drainage patterns and associated increased runoff at the site for any new grading that results in the loss of vegetated, sandy, permeable ground areas, which could alter surface runoff at the site. The analysis shall be completed consistent with Standard Urban Stormwater Mitigation Plan regulations, as specified by the Public Works Director/City Engineer. The hydrologic analysis shall be submitted to the Public Works Director/City Engineer for review and approval prior to conducting any Drilling Project activities. Any new grading that requires a hydrologic analysis shall not occur until the Public Works Director/City Engineer approves the hydrologic analysis.

SECTION 28. STORAGE OF HAZARDOUS MATERIALS AND OIL FIELD WASTE REMOVAL.

- A. Storage of Hazardous Materials.** The Operator shall comply with all provisions of Subchapter 9.03.100, et seq. of the CCMC relating to Hazardous Materials Disclosure Requirements, Business Plans, and Inspections.
- B. Waste Discharge and Collection.**
1. No drilling, redrilling, reworking or maintenance waste ("Drilling Waste") shall be discharged into any sewer, storm drain, irrigation systems, stream, creek, street, highway or drainage canal.
 2. No Drilling Waste shall be discharged on the ground, except for the proper use of active drilling sumps and mud pits.
 3. Drilling Waste shall be discharged into portable steel tanks compliant with API standards and collected in portable steel bins compliant with US Department of Transportation standards.
 4. All Drilling Waste shall be disposed of in compliance with all applicable City, regional, State, and Federal rules and regulations.
 5. Drilling Waste materials, that are not intended to be injected into a Class II Well as permitted by DOGGR, shall be removed from the Oil Field no later than 30 days following the completion of the drilling operation that generated the waste.
- C. Recycling and Removal Plan.** Within 180 days of the date of approval of the Comprehensive Drilling Plan or at such later date as may be approved by the Public Works Director/City Engineer, for good cause shown, the Operator shall prepare a Recycling and Removal Plan, to be reviewed and approved by the Public Works Director/City Engineer:

1. The Recycling and Removal Plan shall include, but not be limited to, the following:
 - a. Identification of how recycling will be incorporated into Oil Operations, including debris generated during construction, drilling and other Oil Operations;
 - b. Use of mulching, composting, and grass-cycling on landscaped areas;
 - c. Design and allocation of recycling collection and storage space;
 - d. An employee participation recycling program;
 - e. Employee education through a series of brief educational sessions to demonstrate how employees can further contribute to recycling and conservation; and
 - f. Identification of methods of loading, transport, and receiving locations for all waste from the Oil Field.
2. This requirement may be satisfied if the Operator can demonstrate, to the satisfaction of the Public Works Director/City Engineer, that a Recycling and Removal Plan that meets these requirements is being implemented and has been approved for other parts of the Oil Field and can conclusively show that the Recycling and Removal Plan applies to the Oil Field within the jurisdiction of the City. Additional information may be required by the Public Works Director/City Engineer to demonstrate compliance with this Section.

SECTION 29. BIOLOGICAL RESOURCES.

All Oil Operations within the City's jurisdiction shall be conducted in a manner that minimizes impacts to biological resources and shall comply with the following provisions:

- A. Oil Spill Response.** The Operator shall comply with all provisions of the approved ERP to protect biological species and to revegetate any areas disturbed during an oil spill or clean-up activities. At a minimum, the ERP shall include:
 1. Measures to avoid impacts on native vegetation, wildlife habitats, plant and animal species, and environmentally sensitive habitat areas during response and cleanup operations;
 2. Measures that identify low-impact site-specific methods for addressing spills or other accidents such as hand-cutting contaminated vegetation and using low-pressure water flushing; and
 3. If disturbance cannot be avoided, the ERP shall provide site-specific habitat restoration plans and species-specific measures to mitigate impacts on sensitive species and to restore native plant and animal communities to pre-spill conditions. This plan shall include a schedule for re-establishing vegetation that replicates the habitat disturbed, or, for disturbed habitat

previously dominated by non-native species, replacement with suitable native species.

- B. Special Status Species and Habitat Protection Plan.** Within 180 days of the date of approval of the Comprehensive Drilling Plan or at such later date as may be approved by the Community Development Director, for good cause shown, the Operator shall prepare, using a qualified biologist approved by the City, a Special Status Species and Habitat Protection Plan, which shall be submitted to the Community Development Director for review and approval. The Special Status Species and Habitat Protection Plan shall be reviewed and updated as appropriate annually with each Annual Consolidation and Drilling Plan, or with any Well and Well Pad Abandonment Plan (or similar). Prior to any disturbance of sensitive natural habitat areas as identified in the Plan, the biologist shall conduct a survey of the area to determine if impacts to sensitive natural habitat will occur, including, but not limited to, coastal sagebrush, coyote bush scrub, riparian scrub, and oak woodland. If the biologist determines that impact to sensitive natural habitat will occur, then the Operator shall have a City-approved restoration specialist, with expertise in southern California ecosystems and revegetation techniques, identify habitat restoration and revegetation measures for the Plan. No removal of sensitive natural habitat shall occur until the Plan has been approved by the City. The Plan shall also consider the need for project-specific surveys including sensitive plant surveys, sensitive wildlife surveys in habitat areas that could support sensitive wildlife species, and breeding and nesting bird surveys for activities occurring during the breeding season (February 1 to August 31 for raptors, and March 15 to September 15 for sensitive/common birds). If the qualified biologist determines the need for project-specific surveys, then the Plan shall detail how and when those project-specific surveys will be conducted. Additionally, the Plan will include a worker training program to ensure all workers on site are aware of protection measures and disturbance limits. The Operator shall comply with all provisions of the Plan. Any modifications to the Plan shall be submitted to the Community Development Director for review and approval.
- C. Listed Plant or Wildlife Species.** If federal-or state-listed threatened, endangered, candidate, or special-status plant or wildlife species are found, then the Operator shall comply with all applicable U.S. Fish and Wildlife Service and California Department of Fish and Wildlife rules and regulations and provide a minimum 3:1 replacement of occupied habitat with occupied habitat. Copies of any documentation provided to or received from the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife demonstrating compliance with applicable requirements, shall be provided to the Community Development Director.
- D. Monitoring.** If the Special Status Species and Habitat Protection Plan determines project-specific surveys are needed, and such surveys find sensitive plants, wildlife species, or nesting birds, a biological monitor hired by the Operator, and approved by the Community Development Director, shall be on site to monitor the impact that the project-specific activities might have on sensitive resources. The biological monitor shall be responsible for the following:

1. Establishing a 300-foot buffer around any active breeding bird nests within which Project activities will be severely restricted to prevent nesting disturbance;
 2. Assuring that vegetation removal does not harm sensitive wildlife species;
 3. Monitoring for sensitive wildlife species and relocating them to suitable habitat;
 4. Ensuring exclusionary fencing is installed around project-specific sites to reduce impacts to sensitive wildlife;
 5. Checking potable and non-potable water sources on the Project site daily to ensure that wildlife (including birds) are not accessing them;
 6. Inspecting all potential wildlife pitfalls no fewer than three times daily throughout and at the end of each work day to ensure no wildlife entrapment. Should wildlife become trapped, the biological monitor shall remove it (if feasible and safe to do so) or immediately contact CDFW;
 7. Implementing CDFW guidance on the disposal, storage, or curation of wildlife mortality, and reporting wildlife injury and/or mortality to CDFW as soon as possible; and
 8. Ensuring that night lighting, dust, and noise resulting from project activities are minimized and kept at a level that would not be expected to have a measurable effect on any identified sensitive wildlife species on the Project site.
- E. Tree and Riparian Scrub Removal.** Removal of native or non-native trees and riparian scrub vegetation shall be scheduled, as possible, for removal outside the nesting season to avoid impacts to nesting birds. If avoidance of removal of trees or riparian scrub during the recommended periods is not possible, a City-approved biologist shall perform a survey to ensure that no nesting birds are present prior to removal. If for any reason a nest must be removed during the nesting season, copies of any documentation provided to or received from the U.S. Department of Fish and Wildlife Service and California Department of Fish and Wildlife demonstrating compliance with applicable requirements, authorization of the nest relocation, and all relocation efforts, shall be provided to the Community Development Director.
- F. Habitat Restoration.** Within 60 days of completing Drilling Project activities that impact sensitive natural habitat, the Operator shall begin habitat restoration consistent with the approved Special Status Species and Habitat Protection Plan. Restoration priority shall be given to areas of degraded habitat connecting areas of higher quality habitat and where restoration would produce larger corridors to support the migration and movement of wildlife. The Operator shall replace any loss of sensitive natural habitat at the following ratios:
1. 1:1 for each acre of native scrub vegetation including but not limited to coastal sagebrush or coyote bush scrub, California sagebrush, and California buckwheat scrub.
 2. 2:1 for each acre of riparian scrub or oak woodland.

3. 2:1 for each individual special status plant species.

G. Jurisdictional Resources. Prior to implementing Project activities, a qualified biologist shall assess proposed disturbance areas for presence or absence of drainage features potentially regulated by the USACE, the CDFW, and the RWQCB pursuant to Section 404 of the Clean Water Act and Sections 1600 et seq. of the California Fish and Game Code. If present, a jurisdictional determination report identifying and describing such areas per agency requirements shall be prepared. If the project activities would impact these features directly or indirectly, the applicable regulatory permits will be obtained prior to commencing with project impacts to jurisdictional drainages. Mitigation shall be incorporated with agency permits and will include a minimum 1:1 replacement ratio of permanent lost jurisdictional drainage and associated resources.

SECTION 30. CULTURAL RESOURCES.

A. Archeological Training. The Operator shall provide archeological training for all persons who will be involved with ground disturbance activities for the proposed Drilling Project. Documentation that such training has occurred shall be submitted to the Community Development Director prior to conducting any ground disturbance activities. All such persons shall be required to participate in the training and must receive training material prepared by a qualified archaeologist prior to working on ground disturbance activities. The training material shall include, at a minimum, the following:

1. Review of the types of archaeological artifacts that may be uncovered;
2. Examples of common archaeological artifacts to examine;
3. Review of what makes an archaeological resource significant to archaeologists and local Native Americans;
4. Procedures for notifying involved or interested parties in case of a new discovery;
5. Reporting requirements and responsibilities of construction personnel;
6. Procedures that shall be used to record, evaluate, and mitigate new discoveries; and
7. Procedures that shall be followed in the case of discovery of disturbed, as well as intact, human burials and burial-associated artifacts.

B. Cultural Resources Assessment.

1. Prior to conducting ground disturbance activities, the Operator shall submit a Cultural Resources Assessment to be reviewed and approved or conditionally approved by the Community Development Director. The Assessment shall be prepared by a qualified City-approved archaeologist and shall contain an archeological, cultural resources, and paleontological assessment of the proposed ground disturbance activities to determine the likelihood of identifying resources. The Assessment shall include a records search, and site

reconnaissance, and include recommendations for mitigating potential impacts. In the event that unknown archaeological artifacts are encountered during grading, clearing, grubbing, and/or other ground disturbance activities, work shall be stopped immediately in the vicinity of the find and the resource shall be evaluated by a qualified independent archaeologist, approved by the Community Development Director. The archeologist shall also identify whether the proposed ground disturbance activities would require monitoring, either by the archaeologist or a Native American monitor (where appropriate) for potential archaeological resources, and the preparation of a Treatment Plan to ensure that any new discoveries are adequately recorded, evaluated, and, if significant, mitigated. If a Treatment Plan is required, it shall be submitted prior to ground disturbance activities. The monitor will have the authority to halt earth-disturbing activities. The Treatment Plan shall be approved by the Community Development Director, and the Operator shall comply with all provisions of the Assessment. This requirement may be satisfied if the Operator can demonstrate, to the satisfaction of the Community Development Director, that a Cultural Resources Assessment that meets these requirements has been prepared and approved for other parts of the Oil Field and can conclusively show that the Cultural Resources Assessment applies to the Oil Field within the jurisdiction of the City. Additional information may be required by the Community Development Director to demonstrate compliance with this Section.

2. The Operator shall have a qualified paleontologist, approved by the Community Development Director, monitor all rough grading and other significant ground disturbing activities in paleontological sensitive sediments. The monitor will have the authority to halt earth-disturbing activities. The sensitive sediments that have been identified within the Oil Field include the Lower to Middle Pleistocene San Pedro Formation and the Middle to Upper Pleistocene Lakewood Formation. Sediment samples shall be collected as deemed necessary during monitoring efforts to recover small vertebrate fossil if they exist. Any fossils recovered during monitoring should be deposited in an accredited scientific institution in perpetuity. In the event that fossils are deposited, the paleontologist will prepare a report describing the results of the monitoring efforts, field and laboratory methods, description of the geology and paleontology, and a description of taxa recovered and analysis performed. A paleontologist will not be required on site if excavation is only occurring in artificial fill or Holocene alluvium.
- C. Human Remains.** In the event human remains are discovered, the qualified archeologist, in consultation with the Community Development Director, shall determine disposition of the remains after consultation with the County Coroner and Native American Most Likely Descendent, in accordance with California Health and Safety Code §7050.5 and CEQA Guidelines §15064.5(e).

SECTION 31. CONSOLIDATION AND ANNUAL DRILLING, REDRILLING, WELL ABANDONMENT, AND WELL PAD RESTORATION PLAN.

- A. Consolidation.** The Operator shall consolidate well drilling operations within the Oil Field to reduce impacts to surrounding land uses.
- B. Annual Consolidation and Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan (the “Annual Consolidation and Drilling Plan”).** Prior to the end of each calendar year, for each year that the Comprehensive Drilling Plan is in effect, the Operator shall develop and submit an Annual Consolidation and Drilling Plan for review and approval by the Community Development Director. The Community Development Director shall complete the review of the Annual Consolidation and Drilling Plan (and any amendments) within 45 days of receipt, and shall either approve the Annual Consolidation and Drilling Plan or provide the Operator with a list of deficiencies. The Annual Consolidation and Drilling Plan shall describe all drilling and related activities (including all proposed well stimulation treatments, as applicable) and provide a schedule to avoid over concentration of such activities in any particular year and in any one area. No drilling, redrilling or abandonment activity may be commenced, nor shall any Drilling Use Permit be issued for any drilling or redrilling activity, unless it is described in an approved Annual Consolidation and Drilling Plan or an amendment thereto. The Annual Consolidation and Drilling Plan shall include the following:
1. The maximum number of wells to be drilled or redrilled on an annual basis, which shall be no more than two wells per year for the first two years; if in any year thereafter, the Community Development Director determines that the Specific Plan and these Drilling Regulations are sufficiently protective of the public health, safety and welfare, and the environment, then three wells per year may be drilled, until such time that the Community Development Director determines otherwise or the maximum number of allowed new or redrilled wells is reached (as set forth in Section 21.J.1);
 2. No more than one drilling or redrilling rig erected at any one time;
 3. Approximate location and estimated construction dates of all wells proposed to be drilled or redrilled over the following calendar year. This information shall also include wells proposed or permitted to be drilled or redrilled and existing wells in active or potentially active operation in the Los Angeles County portion of the Inglewood Oil Field to the extent such wells may result in impacts to Culver City neighborhoods. Impacts from the Los Angeles County portion of the Oil Field shall be taken into account in planning the location and timing of drilling in the IOF;
 4. Approximate location of all proposed new well pads, including their size and dimensions;
 5. Estimated target depth of all proposed wells and their estimated Bottom Hole locations;
 6. A narrative of the steps that have been taken to maximize use of existing well pads, maximize use of redrilled wells, and maximize the consolidation of wells. Where well consolidation is not proposed, sufficient detail, as determined and

requested by the Community Development Director, shall be provided for the City to review the extent to which well consolidation is not technically feasible and commercially reasonable;

7. Location of all proposed well Abandonments known at the time of submission of the Annual Consolidation and Drilling Plan;
 8. Location of all well pads proposed to be abandoned and restored (a separate Restoration Plan will be required per Section 49 and/or Section 51);
 9. A proposed schedule and phasing of the drilling, redrilling, well abandonment, well pad abandonment, and restoration activities;
 10. A proposed schedule and description of maintenance activities and equipment;
 11. A topographic vertical profile showing proposed location of new wells that reflects local terrain conditions and that addresses the potential visibility of existing and proposed wells and other production facilities from areas outside the Oil Field;
 12. Location of specific landscaping and/or fencing used to visually screen the Oil Operations and related equipment from residential, recreational, and institutional land uses or adjacent public streets, and to improve the visual appearance of existing Oil Field operations. If no landscaping is proposed, an explanation as to the infeasibility of screening particular operations and/or equipment;
 13. A description of all grading that will be conducted during the Annual Drilling Plan period;
 14. Inventory of wells within drilling setbacks, see Section 21.J;
 15. Availability and feasibility of the use of natural gas-powered drill rigs or other technology capable of reducing environmental impacts (See Clean Technology Assessment, at Section 31.B); and
 16. Identify and report on condition of all existing wells within 1,000 feet of any proposed injection wells.
 17. A description of well consolidation, drilling, redrilling, abandonment and restoration activities completed in the previous twelve month period, including a summary comparison of activities that were proposed in the previous year approved Annual Consolidation and Drilling Plan to events that were physically implemented.
- C. Deep-Zone and Mid-Zone Supplements.** As described in Section 21.J.2, a Deep-Zone Supplement or Mid-Zone Supplement (Supplements) to the Annual Consolidation and Drilling Plan is required for all Deep-Zone Wells or Mid-Zone Wells where the Top Hole is within 800 feet of a Sensitive Developed Area. The Supplements shall include a study of the technical feasibility and commercial reasonability of Slant Drilling to locate the Top Hole of any such well further away from any Sensitive Development Area. The study shall justify the proposed surface location, and provide sufficient detail regarding the feasibility of locating the Top

Hole away from a Sensitive Developed Area to mitigate potential impacts and still reach the targeted Bottom Hole location. The Operator shall provide the Community Development Director with any additional information requested in order to complete review of the Supplement. If any information regarding Slant Drilling is proprietary and/or confidential, the City will enter into an agreement with the Operator to protect such information.

The Community Development Director shall review and consider Supplements within 45 calendar days of submission to the City. The Community Development Director shall either approve the plan or provide a list of deficiencies and/or supplemental information needed within the 45-day timeframe. The Operator may drill any wells approved under the Annual Drilling Plan regardless of the status of the City's review of the Supplements. Similarly, the Operator may drill any wells approved under a Supplement regardless of the status of review and approval of the Annual Drilling Plan. Changes to well pad locations as a result of the review of the Supplements shall not require resubmittal of the Annual Drilling Plan or delay any drilling under the Annual Drilling Plan, beyond the time necessary to implement such changes.

SECTION 32. WELL STIMULATION TREATEMENTS.

(NOTE: The EIR for the Proposed Inglewood Oil Field Specific Plan Project ("Specific Plan EIR") will evaluate the potential environmental impacts of conducting Well Stimulation Treatments, within the Oil Field, performed in a manner consistent with DOGGR's Senate Bill 4 regulations as of July 1, 2015, and the site-specific requirements set forth in the draft Specific Plan. In taking action on the Specific Plan, the City Council will consider the available information, including the Specific Plan EIR, in making a determination as to whether and upon what terms the adopted Specific Plan, including these Drilling Regulations, would allow Well Stimulation Treatments to be conducted within the Oil Field.)

SECTION 33. WELL REWORKING.

- A.** No more than two rigs used for reworking shall be present within the Oil Field at any one time, unless an emergency condition requires additional rigs.
- B.** With the exception of emergencies, well reworking operations shall not be allowed after 7:00 p.m. or before 7:00 a.m., nor on Saturdays, Sundays or legal holidays.
- C.** Rigs used for rework shall be removed from the Oil Field within seven days following the completion of reworking operations unless the rig will be used on another well at the Oil Field within five days.

SECTION 34. PROCESSING.

All processing operations shall be conducted in accordance with the best available technology and shall comply with the following provisions:

- A. Limits on Processing Operations.** Unless Operator submits to the Community Development Director documentation that additional processing operations are required by DOGGR, the only processing operations permitted at the well site are the dehydration of crude oil and gas produced from the well, the storage, handling, recycling, and transportation of such materials, and those processing operations required for water injection purposes.
- B. Well Pump Motors.** All well pumping units shall be operated by electric motors.
- C. Well Pumps.** Downhole submersible pumps and low-profile pumping units for production wells shall be used when there is the potential for the pump or pumping unit to be visible to surrounding residences and park users, as determined by the Community Development Director. If the use of downhole submersible pumps and low-profile pumping units is not feasible, Operator shall: (1) demonstrate why it is not feasible; and (2) take additional measures to reduce visibility of the pumps or pumping units to surrounding residences and park users, as determined by the Community Development Director.
- D. Removal by Pipeline Only.** All oil, gas, and other hydrocarbon substances, except propane and other related natural gas liquids, produced from any well within the Oil Field shall be shipped and transported through pipelines, except in case of an emergency or when access to a pipeline becomes unavailable. If the Operator provides documentation satisfactory to the Fire Chief that any pipeline through which oil or gas is currently transported is unavailable for the safe transportation of said products due to maintenance problems with the pipeline, or lack of sufficient capacity within the pipeline to handle the volume of oil and gas needing transportation, or because the owner or operator of such pipeline elects to discontinue transporting oil or gas through such pipeline, then the Operator shall, within 180 days of the date the existing pipeline becomes unavailable, seek to acquire a private right of way or easement, or shall file an application for a right of way, easement, encroachment permit, or franchise for the construction of a replacement pipeline and shall diligently prosecute such application until such pipeline is completed. During any emergency situation, or during such time as any existing pipeline becomes unsafe or unavailable, oil and gas may be transported by truck for up to 180 days, unless extended by the Fire Chief for good cause shown, until the emergency situation is resolved or until a replacement pipeline is permitted and constructed in compliance with all applicable laws and regulations. In addition, the Operator shall coordinate with emergency service providers to alert them regarding the emergency and provide an oversight mechanism to ensure prompt resolution.
- E. Pipelines.** The Operator shall comply with the following provisions:
1. Notwithstanding Section 20.E.2, new pipelines that transport oil or gas from the Oil Field shall be buried below the surface of the ground;
 2. Notwithstanding Section 20.E.2, all pipelines that are not enclosed within a fence, and all pipelines (whether or not fenced) which are located within 500 feet of any residential, commercial, cultural, educational, religious or government building, shall be placed underground or covered with materials

approved by the Fire Chief. Said covers shall be maintained in a neat, orderly, and secure manner;

3. Any and all water or brine produced during pipeline construction shall either be injected in accordance with DOGGR requirements, or disposed of in accordance with other local, state or federal regulations. Copies of any documentation provided to or received from DOGGR demonstrating compliance with these requirements shall be provided to the Public Works Director/City Engineer;
 4. New pipeline corridors shall be consolidated with existing pipelines or electrical transmission corridors where feasible; and
 5. Upon completion of pipeline construction, the site shall be restored to the approximate previous grade and condition as determined by the Public Works Director/City Engineer.
- F. Active Pipeline Plot Plan.** Within one year of the date of approval of the Comprehensive Drilling Plan, or at such later date as may be approved by the Fire Chief, for good cause shown, the Operator shall prepare and submit to the Fire Chief a plot plan prepared by a land surveyor or civil engineer licensed by the State of California depicting exact location of all active pipelines regulated by the California Department of Transportation or California State Fire Marshall owned by the Operator that are located within and outside the Oil Field, including waste water, and trunk and gathering line to transport crude oil or hydrocarbon substances. New pipelines or relocation of existing pipelines shall require the submittal of a revised surveyed plot plan within 30 days of installation of the pipelines, or at such later date as may be approved by the Fire Chief, for good cause shown.
- G. Machinery Enclosures.** The Operator shall maintain enclosures around machinery with moving parts consisting of a fence, screening, or housing. Said enclosures shall be installed in compliance with the CCMC.
- H. Opening Protections.** The Operator shall cap, close, or protect the openings in all oil wells, test holes, and similar excavation to prevent injury or accidents.
- I. Transportation Risk Management and Prevention Plan.** Within 180 days of the date of approval of the Comprehensive Drilling Plan and reviewed and/or updated every subsequent two years thereafter, or at such later date as may be approved by the Public Works Director/City Engineer, for good cause shown, Operator shall prepare and submit to the Public Works Director/City Engineer for review and consideration of approval a Transportation Risk Management and Prevention Plan, which shall include, but is not limited to, the following:
1. Identification of transportation routes of propane, butane and natural gas liquids for all Oil Operations;
 2. Provisions for conducting biennial comprehensive audits of the carriers to assure satisfactory records, driver hiring practices, driver training programs, programs to control drug and alcohol abuse, safety incentive program, satisfactory vehicle inspections and maintenance procedures and emergency notifications;

3. Provisions for allowing only carriers that receive a satisfactory rating under the above audit;
4. Truck loading procedures and checklist for ensuring that the loading rack operator and the truck driver both conduct and document in writing, a visual inspection of the truck before loading and after completing the loading;
5. Provisions for requiring transporters to use only carriers with vehicle monitoring system for governing or monitoring vehicle speed;
6. Provisions for requiring shippers to use carriers with cellular phones for shipments; and
7. Any other additional information required by the Public Works Director/City Engineer.

SECTION 35. WELL CELLARS.

All well cellars shall be constructed in accordance with the most current API standards and DOGGR requirements, whichever are more restrictive. In addition, the Operator shall comply with the following provisions:

- A. Cellar Fluids.** Well cellars shall be kept free of all oil, water, or debris at all times. During drilling, redrilling, reworking and maintenance, the cellar shall be kept free of excess fluids by a pump that discharges into a waste tank, mud pit, vacuum truck, or other approved disposal system.
- B. Access to Multi-Well Cellars.** All multi-well cellars exceeding three feet in depth and 25 feet in length shall have two means of entrance and exit and an additional exit for every 50 feet in length thereafter. At least one means of entrance or exit for all multi-well cellars of 25 feet in length shall be a stairway constructed to California Division of Industrial Safety standards.
- C. Single-Cellar Covers.** All single cellars shall be covered with open grating and have no openings larger than three inches at any point. Covers shall be capable of supporting vehicle weight or guardrails shall be erected to prevent vehicle access.
- D. Cellar Ladder Openings.** All openings for ladders through grating shall be designed to allow exit from underside without obstruction and shall be kept free of storage of any type. Said openings shall not be less than 24 inches on either side.

SECTION 36. LIGHTING.

Outdoor lighting shall be restricted to only those lights that are required by the CCMC and other applicable federal, state and local regulations for the lighting of building exteriors, drilling, and redrilling rigs and for safety and security needs. In addition, the Operator shall comply with the following provisions:

- A. Screening.** All new point lighting sources within the Oil Field shall be screened and directed to confine direct rays to the Oil Field and to prevent offsite spillover of

lighting to surrounding residential, recreational, and other Sensitive Developed Areas.

- B. Lighting Plan.** A detailed Lighting Plan shall be prepared for each new permanent structure and submitted to the Community Development Director for review and approval. No work may be commenced on such permanent structure until the Lighting Plan has been approved by the Community Development Director. The Lighting Plan shall include any measures requested by the Community Development Director

SECTION 37. LANDSCAPING.

- A. Landscaping Plan.** Concurrently with the submission of the Comprehensive Drilling Plan, or at such later date as may be approved by the Community Development Director, for good cause shown, Operator shall submit a Landscaping Plan to be reviewed and approved or conditionally approved by the Community Development Director. The Plan shall be designed to: (1) specify landscaping and fencing that will be used to visually screen the Oil Operations and related equipment and facilities from Developed Areas or adjacent public streets; (2) improve the visual appearance of the existing Oil Field; and (3) ensure compatibility with the surrounding environment. The Plan shall be reviewed by the Operator in conjunction with the Annual Drilling Plan to determine if modifications to the Plan are required and report its findings to the Community Development Director. Such findings and proposed modifications to the Plan shall be submitted to the Community Development Director for review and consideration of approval. Operator shall comply with all provisions of the approved Plan.
- B. Irrigation.** Landscaping shall be irrigated and maintained to ensure that landscaping provides sufficient screening.
- C. Inspection and Maintenance.** All landscaping and vegetation shall be routinely inspected (on at least a monthly basis) and maintained in a neat, clean and healthful condition, including proper watering, pruning, weeding, removal of litter, fertilizing, and replacement of plants as needed. Litter shall also be removed on a regular basis when necessary.

SECTION 38. PUBLIC ROADWAYS AND PRIVATE ROAD CONSTRUCTION

- A. Deliveries.** In the event deliveries of new drilling, maintenance or other equipment or machinery, or the removal of drilling rigs or other equipment or machinery, would utilize Culver City roadways, all truck routes and oversize vehicle trips must be approved by the Public Works Director/City Engineer prior to delivery of equipment or removal of drilling rigs. The Drilling Project traffic shall avoid peak hours and residential roadways to the maximum extent feasible.
- B. Construction of Private Roads.** Roads and other excavations shall be designed, constructed, and maintained to provide stability of fill, minimize disfigurement of the landscape, prevent deterioration of vegetation, maintain natural drainage, and

minimize erosion, dust and debris. Prior to construction of any new road, the Operator shall prepare and submit to the Public Works Director/City Engineer for review and consideration of approval a Private Road Construction Plan. The Operator shall thereafter comply with all provisions of the approved Private Road Construction Plan. All new private access roads leading off any surfaced public street or highway shall be paved with asphalt or concrete not less than three inches thick for the first 50 feet of said access road from the public street or highway.

SECTION 39. SIGNS.

- A. Perimeter and Entrance Identification Signs.** Identification signs, at intervals acceptable to the Community Development Director, shall be posted and maintained in good condition along the Outer Boundary line fence, along the fences adjoining the public roads that pass through the Oil Field and at any entrance to the Oil Field. Each sign shall prominently display current and reliable emergency contact information that will enable a person to promptly reach, at all times, a representative of the Operator who will have the expertise to address any potential problem and recommend a corrective course of action. Each sign shall also have the telephone number of the Community Development Department and the number of SCAQMD that can be called if odors are detected. Identification signs shall be installed within 60 days of the date of approval of the Comprehensive Drilling Plan or at such later date as may be approved by the Community Development Director, for good cause shown.
- B. Derricks and Rigs.** A sign shall be placed on each derrick and rig that displays the name and number of the well being drilled or operated and the name of the Operator. The letters of the sign shall be at least two inches in height and fully visible from two opposite sides of the derrick and rig.
- C. Fire Prevention.** The Operator shall post the Oil Field with signage as required by the Fire Chief, in accordance with the California Fire Code, including, but not limited to, appropriate "No smoking" signs, with letters at least four inches in height.
- D. Other Required Signs.** All identification signs, warning signs, no trespassing signs, and other signs required by City, regional, State and Federal regulations shall be properly posted and maintained in all required locations and in good condition.
- E. Well Identification Signs.** Per California Fire Code, well identification signs shall include name of the owner or Operator, the well name and well number, and a telephone number where a responsible party can be reached at any time. Each well identification sign shall be posted and maintained in good condition at each well location to the satisfaction of the Fire Chief.
- F. No Littering Signs.** "No littering" signs shall be prominently posted and maintained in good condition on all Oil Field entrance gates. Such signs shall be installed within 60 days of the date of approval of the Comprehensive Drilling Plan or at such later date as may be approved by the Community Development Director, for good cause shown.

- G. City Approval.** The location, type face, design and quality of all signs shall be subject to approval by the Community Development Director. All such signs shall be maintained in good condition and replaced when necessary.

SECTION 40. EQUIPMENT REMOVAL AND MAINTENANCE.

- A. Abandoned and Unused Equipment Removal Plan.** For projects within the Oil Field, concurrently with the submission of the Comprehensive Drilling Plan and the submission of each Annual Consolidation and Drilling Plan, or at such later date as may be approved by the Public Works Director/City Engineer, for good cause shown, the Operator shall submit an Unused or Abandoned Equipment Removal Plan to the Public Works Director/City Engineer for review and approval. The Plan shall include an inventory of all unused or abandoned equipment identifying all parts, equipment and machinery that is no longer in service and is not intended for prompt use in connection with Oil Operations. All existing facilities that have reached the end of their useful economic life shall be properly decommissioned and removed from the Oil Field within one year from the date of approval of the Comprehensive Drilling Plan and, thereafter, other existing facilities and all new facilities that have reached the end of their useful economic life shall be properly decommissioned and removed from the Oil Field within one year. The Operator shall file a semi-annual compliance report with the Public Works Director/City Engineer. Equipment, machinery and materials not necessary to Oil Operations as identified by the Public Works Director/City Engineer shall be promptly removed from view of Sensitive Developed Areas.
- B. Revegetate Equipment Removal Areas.** Areas not slated for future use, as identified in the Annual Drilling Plan, shall be restored and revegetated within 90 days of termination of use, unless such restoration and revegetation would interfere with fire safety or access to Oil Operations, as determined by the Fire Chief.
- C. Equipment Maintenance.** All actively-used equipment, improvements, facilities, and other personal property or fixtures shall be maintained in good condition to the satisfaction of the Public Works Director/City Engineer.

SECTION 41. OTHER STANDARDS.

- A. Security.** All unmanned entrances to the Oil Field shall be equipped with sliding gates that shall be kept closed at all times except when authorized vehicles are entering or leaving the field. The Operator shall have a security guard on duty 24 hours per day. The requirement for a security guard may be satisfied if the Operator can demonstrate, to the satisfaction of the Community Development Director, that a security guard is on duty 24 hours per day for other parts of the Inglewood Oil Field and can adequately provide security for the Oil Field within the jurisdiction of the City. Additional information may be required by the Community Development Director to demonstrate compliance with this Section.
- B. Fencing.** All portions of the oil and gas drilling operations shall be enclosed with a fence compliant with DOGGR regulations codified at California Code of Regulations

Title 14, Article 3, sections 1778 and 1779, or as may be subsequently amended by the state.

- C. Storage of Equipment.** There shall be no storage of material, equipment, machinery or vehicles which are not intended for prompt use in connection with Oil Operations. Any equipment that is not intended for prompt use shall be removed from the Oil Field.
- D. Painting.** Within two years of the date of approval of the Comprehensive Drilling Plan, or at such later date as may be approved by the Community Development Director for good cause shown, all Oil Operations-related structures visible from public roadways and surrounding properties shall be painted or otherwise surfaced or textured with a color that is compatible with Developed Areas and has been approved by the Community Development Director. The painting or other surfacing of structures shall be maintained in good condition. This requirement may be satisfied if the Operator can demonstrate, to the satisfaction of the Community Development Director, that such Oil Operations-related structures have been painted or otherwise surfaced or textured with a color that meets the requirements for other parts of the Inglewood Oil Field and also meets the intent of this Section. Additional information may be required by the Community Development Director to demonstrate compliance with this Section.

SECTION 42. DIRECTIONAL DRILLING SURVEYS REQUIRED ON CERTAIN WELLS.

Whenever Operator drills, re-drills, or deepens any well, or well hole, and the Top Hole or Bottom Hole location is within 400 feet of any exterior boundary line of any City-owned property, the Operator shall make, record and keep true and accurate sub-surface Directional Drilling Surveys of such well or well hole, with stations at not more than 100-foot intervals in such well or well hole. The result of each survey shall be fully and accurately shown on a plat, which shall be submitted to the Community Development Director within 60 days of completion of drilling or redrilling. Each plat shall include:

- A.** The exterior boundaries of the property on which such well or well hole has been or is being drilled, re-drilled or deepened; and, if such property is part of, but less than the whole of, a larger parcel of land owned, leased or controlled, or operated or to be operated, as a single drilling or operating unit of lease, the exterior boundaries of such larger parcel.
- B.** The location of such well or well hole on the surface in relation to such boundaries.
- C.** The sub-surface location of the point of cementing each string of casing.
- D.** The sub-surface location of the lowest point in such well or well hole, from which production of oil, gas and/or other hydrocarbon substances is procured or obtained.
- E.** The continuous and entire course of the well hole, as surveyed, shall be presented accurately on one plat.

SECTION 43. DUPLICATE NOTICES.

The Operator shall file with the Community Development Director copies of all notices required by any State regulatory agency.

SECTION 44. INSPECTION OF PREMISES.

The Operator shall allow authorized City officials, or their designees, reasonable access to the Oil Field for the purpose of making inspections to ensure compliance with all provisions of these Drilling Regulations, the Specific Plan, the approved Conditions Compliance Plan and the adopted MMRP.

SECTION 45. WELL AND PRODUCTION REPORTING.

Operators proposing well drilling operations on the Oil Field shall provide annual Production Reports to the Community Development Director on the well production within the area of the field under the jurisdiction of the City as well as the overall field. This reporting shall include copies of all DOGGR Forms 110 and 110B during the previous 12 months; amount of oil and gas produced by well number; number and mapped location of all wells (active, potentially or recently active, injection); the number and mapped location of abandoned and idle wells, including date each well was idled or abandoned; and any other information requested by the City.

SECTION 46. IDLE WELL TESTING AND MAINTENANCE.

The Operator shall comply with Title 14, Section 1723.9 of the California Code of Regulations regarding testing and maintenance of idle wells, or subsequently enacted state regulations regarding testing and maintenance of idle wells. The Operator shall carry out all additional tests, remedial operations, and mitigation measures required by DOGGR if any idle wells do not meet the test standards.

SECTION 47. INJECTION WELLS.

Existing and new Injection Wells must comply with all DOGGR requirements, including sealing and casing integrity, prior to use. Injection Wells shall be properly Abandoned according to DOGGR requirements.

SECTION 48. ABANDONED WELL TESTING.

The Operator shall conduct quarterly testing of abandoned wells for hydrocarbon vapor and any liquid leaks. The first quarterly testing shall be completed within 120 days of the date of approval of the Comprehensive Drilling Plan. The procedures and equipment for such testing shall be reviewed and approved by the Public Works Director/City Engineer. Abandoned wells that are found to be leaking hydrocarbons shall be reported to the Public Works Director/City Engineer and DOGGR within 12

hours of the abandoned well testing. DOGGR shall determine if the well needs to be re-abandoned. If directed by DOGGR, the Operator shall re-abandon the well in accordance with DOGGR rules and regulations. Any abandoned well that is not found to be leaking hydrocarbon vapors or any liquid for eight consecutive quarters (after a hydrocarbon leak is found), shall thereafter be tested on annual basis and such test results shall be submitted to the Public Works Director/City Engineer.

SECTION 49. WELL AND WELL PAD ABANDONMENT.

Wells (new or existing) which remain idle for five years shall be subject to review by the Community Development Director, Fire Chief, and DOGGR to determine if the well should be abandoned, unless Operator can show that the well will go back into production within 180 days. Idle wells shall be abandoned within 180 days of receiving an order from the Fire Chief or DOGGR to abandon. If DOGGR orders the Operator to plug and abandon any wells, the Operator shall commence promptly and proceed diligently with the plugging and Abandonment operations in accordance with DOGGR rules and regulations and the terms of the DOGGR permit to plug and abandon the well. The Operator shall also file DOGGR form titled "Notice of Intention to Abandon/Re-Abandon a Well" with the Fire Chief and the Community Development Director. Well Abandonment may commence once all necessary permits and approvals are obtained. All wells abandoned at the Oil Field shall utilize a total of 150-foot cement surface plug.

If the well pad associated with the well Abandonment does not contain other production, injection, or idle wells, and will not be used for future drilling, then the Operator shall promptly abandon the well pad consistent with the following provisions:

- A. Closure of Sumps.** The Operator shall clean out all sumps, cellars, and ditches, and level and fill all sumps and depressions pursuant to DOGGR requirements. If sumps are lined with concrete, bottoms and walls shall be broken up and removed. Sumps shall be closed in accordance with RWQCB and California Department of Toxic Substances Control requirements.
- B. Well Pad Site Cleanup.** The Operator shall leave the site entirely free of oil, rotary mud, oil-soaked earth, asphalt, tar, concrete, litter, debris, and other substances to the satisfaction of DOGGR requirements and the Community Development Director, and in compliance with federal requirements.
- C. Contaminated Materials.** All contaminated soils and materials within the well pad boundaries shall be removed, remediated, treated or disposed as may be required by local, regional, State, and Federal regulations or other requirements or directives of any agency exercising jurisdiction over the cleanup, including but not limited to the Culver City Fire Department.
- D. Well Pad Revegetation.** The well pad shall be revegetated following the requirements identified in the revegetation recommendations of the Special Status Species and Habitat Protection Plan, and within the timeframes specified in the approved Abandonment Plan, to the satisfaction of the Community Development Director.

SECTION 50. CITY REQUEST FOR REVIEW OF WELL STATUS.

The Community Development Director may periodically request the review and status of the Operator's wells. In addition, the Director may submit to DOGGR a list of wells that should be plugged and abandoned as specified in Public Resources Code Section 3206.5 or any subsequently enacted state law related to a local jurisdiction's right to request state-agency review of idle wells. The failure of the Community Development Director to submit a request to DOGGR for a well to be plugged or abandoned shall not result in a waiver of the right to request that the well be plugged and abandoned in the future.

SECTION 51. OIL FIELD ABANDONMENT PROCEDURES.

Within 180 days prior to permanent facility shut down, the Operator shall submit an Abandonment Plan to DOGGR and shall submit to the Community Development Director for review and approval a timeline for facility removal, Site Assessment, and remediation as necessary. The Operator shall begin abandonment of the site no later than 20 days after the Community Development Director's approval of the timeline, and shall provide to the Community Development Director quarterly updates on the abandonment process until such time as the Oil Field is abandoned and remediated. Immediately following permanent shut down of the facility, all facilities within the Oil Field shall be removed; the site shall be recontoured and revegetated in accordance with a City-approved plan within one year of shutdown. The Operator shall post a performance bond in an amount established by resolution of the City Council, in accordance with Section 9.B, to ensure compliance with all provisions of this Section and the Operator and landowners shall continue to pay property taxes at the rates assessed during Oil Operations until all site restoration work has been fully completed, as determined by the Community Development Director. The Operator and landowners shall be jointly and severally liable for compliance with this Section. A partial closure of the facility, if feasible, shall be permitted as an interim step to full closure.

SECTION 52. SAFETY INSPECTION, MAINTENANCE, AND QUALITY ASSURANCE PROGRAM (SIMQAP).

Within 180 days of the date of approval of the Comprehensive Drilling Plan, Operator shall submit to the Community Development Director and Fire Chief for review and approval, a detailed SIMQAP that covers all existing and proposed Oil Operations. This requirement may be satisfied if the Operator can demonstrate, to the satisfaction of the Community Development Director and Fire Chief that a SIMQAP is being implemented and has been approved for other parts of the Oil Field and can conclusively show that the SIMQAP applies to the Oil Field within the jurisdiction of the City. Additional information may be required by the Community Development Director and Fire Chief to demonstrate compliance with this Section. The following provisions relate to the SIMQAP:

- A. SIMQAP Review and Revisions.** The Operator shall periodically review and update the plan to incorporate changes in procedures, and new safety and maintenance technologies. The Operator shall review and revise the plan at least

every five years or more frequently if the Operator determines changes are necessary, or if requested by the Community Development Director or the Fire Chief. Revisions to the SIMQAP shall be submitted to the Community Development Director and the Fire Chief for their review and approval. The Operator shall respond to any request for additional information within 30 days of receiving such request, unless extended by the City.

- B. SIMQAP Requirements.** The SIMQAP shall include but not be limited to the following:
1. Inspection of construction techniques;
 2. Regular maintenance and safety inspections;
 3. Periodic safety audits;
 4. Corrosion monitoring and leak detection; and
 5. Inspections of all trucks carrying hazardous and/or flammable material prior to loading.
- C. Worker Notification.** The Operator shall ensure that all personnel comply with all provisions of the currently approved SIMQAP.
- D. Inspections.** The SIMQAP shall provide for participation of City staff and the City's On-Site Monitor, at the discretion of the City, in all inspections required by this section.

SECTION 53. COMPLIANCE AND SAFETY AUDITS.

At the discretion of the Community Development Director, the Operator may be required to fund a comprehensive third-party Compliance and Safety Audit of all or a portion of the Oil Operations within the jurisdiction of the City. The audit will ensure the safety of Oil Operations and compliance with all federal, state, regional and local laws, rules and regulations. The third-party auditor shall be approved by the Community Development Director and the Fire Chief. In addition to auditing compliance with agency rules and regulations, there shall also be a Comprehensive Facilities Safety Audit for Oil Operations, including all wells and facilities. In addition to the physical condition of the site, operations and procedures manuals for employees and equipment shall be reviewed, as well as manuals addressing emergency planning and procedures. The results of the Compliance and Safety Audits, together with correction action plans for any non-compliance items or unsafe conditions found in the audit, shall be submitted to the Community Development Director and Fire Chief. The corrective action plan shall identify the non-compliance and unsafe items, describe the corrective action to be taken, and provide the timeline for each element of the corrective action. The Operator shall be in violation of the provisions of this section if the Operator fail to complete any corrective action called for by the corrective action plan within the approved time limits specified in the plan, and be subject to penalties as set forth in Section 9.F. The Operator shall submit to the Community Development Director monthly updates on the corrective action plan until such time as all corrective actions have been completed.

SECTION 54. COMPLAINTS.

All complaints related to Oil Operations within the Oil Field received by the Operator shall be reported on the same business day to the Community Development Director and Fire Chief. Notification of complaints relating to immediate life safety issues shall be made to the affected emergency response agencies no later than 30 minutes after receiving the complaint. In addition, the Operator shall maintain a written log of all complaints and provide that log to the Community Development Director and Fire Chief and other interested parties (i.e. community groups or other interest groups) as identified by the City on a quarterly basis. Depending upon the nature of the complaint, the Operator shall report the complaint to SCAQMD, DOGGR, and any other appropriate agencies with oversight authority regarding the subject matter of the complaint at issue. For example, all air quality and odor complaints shall be reported to the SCAQMD. If the complaint is received after normal business hours, it shall be reported to the Community Development Director and Fire Chief and the agencies at the opening of the next business day.

SECTION 55. COMMUNITY OUTREACH.

Operator shall hold community meetings on an annual basis to provide updates on Oil Operations.

SECTION 56. CONFLICT OF PROVISIONS.

In the event of any conflict between the Specific Plan, including these Drilling Regulations, and any other provisions of the CCMC, these Drilling Regulations and the Specific Plan shall prevail.

SECTION 57. SCHEDULE FOR ABANDONMENT OF WELLS OR OIL FIELD.

(NOTE: The EIR for the Proposed Inglewood Oil Field Specific Plan Project ("Specific Plan EIR") will evaluate the potential environmental impacts of limiting the number of new wells to the required abandonment of a reciprocal number of existing older wells. All well plugging or abandonment procedures would be completed in compliance with DOGGR regulations and site restoration would be in compliance with Sections 31 (Consolidation and Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration), 50 (Well and Well Pad Abandonment) and 52 (Oil Field Abandonment Procedures) of these Drilling Regulations. In taking action on the Specific Plan, the City Council will consider the available information, including the Specific Plan EIR, in making a determination as to whether and upon what terms the adopted Specific Plan (which includes these Drilling Regulations) would require: 1) an expiration date or schedule for the abandonment of any potential new wells established in compliance with these Drilling Regulations; 2) a requirement to abandon any existing non-conforming wells as new wells are added; 3) a schedule and/or parameters for abandonment of any existing non-conforming wells independent of new well activity; and/or 4) the expiration

and abandonment, clean-up and restoration overall within the Oil Field of all oil-related activities.)

APPENDIX D

MONITORING AND REPORTING PROGRAM

Prior to any drilling or redrilling under this Specific Plan, the Oil Field Operator shall first submit and receive approval of the required Comprehensive, Annual and Supplemental Drilling Plans, each demonstrating consistency with the policy guidance provided in the Specific Plan, Chapter 3.0 (Development Plan). Only after approval of the Drilling Plans can a Drilling Use Permit(s) be obtained.

Following approval of the Drilling Plans and/or issuance of a Drilling Use Permit, the Oil Field Operator shall periodically provide the City of Culver City with documentation demonstrating compliance with the provisions of the Specific Plan, including the Drilling Regulations. Specifically, the Oil Field Operator shall provide the monitoring, reporting, and restorative programs, set forth in this **Appendix D**, at the level of detail and frequency identified in the Drilling Regulations (**Appendix C** of the City IOF Specific Plan), and as may also be identified or discussed in the Specific Plan

The final format and requested detail of each Report shall be as determined by the Community Development Director. Once finalized, these Reports shall be made available for review to any member of the public upon request to either the City, or the Administrative Office of the Oil Field Operator.

The schedule and frequency of each Report, Monitoring Program, Training or Inspections, shall be as identified in the Drilling Regulations (and summarized in this **Appendix D**). However, a later date may be approved for good cause shown, as determined and approved by the City of Culver City. In the context of this Specific Plan and the Drilling Regulations, a determination of good cause requires the Oil Field Operator to meet the burden of proof to provide substantial evidence that the asserted basis for a requested extension or minor deviation from any specific deadline, reporting, monitoring or other requirement as set forth in the Drilling Regulations, constitutes an adequate justification for the requested extension and is necessary in order to achieve full compliance with the applicable provision. In part, that burden of proof shall include an explanation of the good faith effort that has been expended toward fulfilling the applicable provision in a timely manner, and shall also include a proposed revised date certain for compliance. Upon determination that the Oil Field Operator has made a good faith effort to comply, the Community Development Director (or Public Works Director, Fire Chief or other City designee, as appropriate) may extend the time or reporting provisions as appropriate. Whenever an extension is requested, the Director shall notify the Council of such request prior to acting upon same.

The following table is a summary of required Permits, Plans, Reports, Actions, Training Programs, Inspection Schedules and similar periodic oversight provisions as set forth in the City IOF Specific Plan Drilling Regulations.

	PERMIT/PLAN/REPORT/ACTION TITLE	DRILLING REGULATIONS SECTION NO.	TO BE PROVIDED OR CONDUCTED BY	SUBMITTAL DUE DATE GUIDELINE	TO BE REVIEWED/APPROVED BY	COMMENTS
SPECIFIC PLAN						
<input type="checkbox"/> SP-1	SPECIFIC PLAN		CULVER CITY	At Adoption	CITY COUNCIL	
<input type="checkbox"/> SP-2	PERIODIC (5-YEAR) REVIEW OF SPECIFIC PLAN	9.H	CULVER CITY	Minimum every 5 years or more frequent if conditions change	COMMUNITY DEVELOPMENT DIRECTOR (REVIEW & RECOMMENDATION); CITY COUNCIL (AMENDMENTS)	
<input type="checkbox"/> SP-3	REGULATORY AGENCY RECORDS	9.I, 43	OIL FIELD OPERATOR	With Comprehensive Drilling Plan and ongoing for life of oil field	COMMUNITY DEVELOPMENT DIRECTOR	
MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)						
<input type="checkbox"/> MMRP- 1	MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)		CULVER CITY	At Adoption	CITY COUNCIL	
COMPREHENSIVE DRILLING PLAN						
<input type="checkbox"/> CDP-1	COMPREHENSIVE DRILLING PLAN	3A, 4A	OIL FIELD OPERATOR	Prior to issuance of any Drilling Use Permit; subject to City Council Approval	CITY COUNCIL	
<input type="checkbox"/> CDP-2	CONDITION COMPLIANCE PLAN	7.A	OIL FIELD OPERATOR	At time of Comprehensive Drilling Plan and reviewed/amended annually with Annual Plan	CITY COUNCIL (INITIAL PLAN) COMMUNITY DEVELOPMENT DIRECTOR (ANNUAL PLANS AND AMENDMENTS)	
<input type="checkbox"/> CDP-3	DRAW-DOWN ACCOUNT, BONDS & INDEMNIFICATIONS	9A, 9B, 9C	OIL FIELD OPERATOR	Established with Comprehensive Drilling Plan application and as required for the life of oil field	COMMUNITY DEVELOPMENT DIRECTOR AND CITY CHIEF FINANCIAL OFFICER	

	PERMIT/PLAN/REPORT/ACTION TITLE	DRILLING REGULATIONS SECTION No.	TO BE PROVIDED OR CONDUCTED BY	SUBMITTAL DUE DATE GUIDELINE	TO BE REVIEWED/APPROVED BY	COMMENTS
<input type="checkbox"/> CDP-4	AUDIT OF FIRE PROTECTION SYSTEMS AND EQUIPMENT	12.E	OIL FIELD OPERATOR	Initial audit within 90 days of Comprehensive Drilling Plan and then every 5 years thereafter	FIRE CHIEF	
<input type="checkbox"/> CDP-5	SPILL CONTAINMENT RESPONSE TRAINING	12.F	OIL FIELD OPERATOR	Initial training within 90 days of Comprehensive Drilling Plan and then annually thereafter	COMMUNITY DEVELOPMENT DIRECTOR AND FIRE CHIEF	
<input type="checkbox"/> CDP-6	EMERGENCY RESPONSE PLAN (ERP)	12.G	OIL FIELD OPERATOR	Initial plan within 180 days of Comprehensive Drilling Plan and then reviewed/updated every 2 years thereafter	COMMUNITY DEVELOPMENT DIRECTOR AND FIRE CHIEF	
<input type="checkbox"/> CDP-7	COMMUNITY ALERT NOTIFICATION SYSTEM (INSTALLED AND TESTING)	12.H	OIL FIELD OPERATOR	Initial system in- place/operational within 90 days of Comprehensive Drilling Plan and then tested/updated annually	FIRE CHIEF AND POLICE CHIEF	
<input type="checkbox"/> CDP-8	ANNUAL EMERGENCY RESPONSE DRILLS	12.I	OIL FIELD OPERATOR	One planned drill and two unannounced drills annually following Comprehensive Drilling Plan	FIRE CHIEF AND LOS ANGELES COUNTY FIRE DEPARTMENT	
<input type="checkbox"/> CDP-9	LEAK DETECTION AND CONTROL PLAN	15.F	OIL FIELD OPERATOR	Initial plan within 180 days of Comprehensive Drilling Plan and then with each Drilling Use Permit	COMMUNITY DEVELOPMENT DIRECTOR AND FIRE CHIEF	
<input type="checkbox"/> CDP-10	PIPELINE MANAGEMENT PLAN	17.A	OIL FIELD OPERATOR	As required by DOGGR and CA Fire Code, to the Fire Chief	FIRE CHIEF	
<input type="checkbox"/> CDP-11	EMISSION OFFSETS (OR RECLAIM CREDITS)	21.A	OIL FIELD OPERATOR	Verified through SCAQMD and track as needed	COMMUNITY DEVELOPMENT DIRECTOR	

	PERMIT/PLAN/REPORT/ACTION TITLE	DRILLING REGULATIONS SECTION No.	TO BE PROVIDED OR CONDUCTED BY	SUBMITTAL DUE DATE GUIDELINE	TO BE REVIEWED/APPROVED BY	COMMENTS
<input type="checkbox"/> CDP-12	ODOR MINIMIZATION PLAN	21.B	OIL FIELD OPERATOR	Initial plan within 90 days of Comprehensive Drilling Plan and then reviewed/updated annually	COMMUNITY DEVELOPMENT DIRECTOR	
<input type="checkbox"/> CDP-13	AIR MONITORING PLAN	21.C	OIL FIELD OPERATOR	Initial plan within 90 days of Comprehensive Drilling Plan and then reviewed/updated annually. Monitoring is ongoing for life of oil field.	COMMUNITY DEVELOPMENT DIRECTOR	
<input type="checkbox"/> CDP-14	FUGITIVE DUST CONTROL PLAN	21.K	OIL FIELD OPERATOR	Initial plan within 120 days of Comprehensive Drilling Plan and reviewed every 5 years; consistent with SCAQMD Rule 403	PUBLIC WORKS DIRECTOR/CITY ENGINEER	
<input type="checkbox"/> CDP-15	QUIET MODE DRILLING PLAN (AND NOISE ATTENUATION MEASURES)	22.C	OIL FIELD OPERATOR	At time of Comprehensive Drilling Plan and reviewed annually	CITY COUNCIL (INITIAL PLAN); COMMUNITY DEVELOPMENT DIRECTOR (ANNUAL REVIEW)	
<input type="checkbox"/> CDP-16	NOISE MONITORING AND REPORTING (BY QUALIFIED ACOUSTICAL ENGINEER)	22.K	OIL FIELD OPERATOR	Monitoring established within 180 days of Comprehensive Drilling Plan with quarterly reports	COMMUNITY DEVELOPMENT DIRECTOR	
<input type="checkbox"/> CDP-17	VIBRATION MONITORING AND REPORTING (BY QUALIFIED ENGINEER)	23.C	OIL FIELD OPERATOR	Monitoring established within 180 days of Comprehensive Drilling Plan with quarterly reports	COMMUNITY DEVELOPMENT DIRECTOR AND PUBLIC WORKS DIRECTOR/CITY ENGINEER,	

	PERMIT/PLAN/REPORT/ACTION TITLE	DRILLING REGULATIONS SECTION No.	TO BE PROVIDED OR CONDUCTED BY	SUBMITTAL DUE DATE GUIDELINE	TO BE REVIEWED/APPROVED BY	COMMENTS
<input type="checkbox"/> CDP-18	ACCUMULATED GROUND MOVEMENT PLAN	24.C	OIL FIELD OPERATOR	Within 180 days of Comprehensive Drilling Plan with quarterly reports	COMMUNITY DEVELOPMENT DIRECTOR AND PUBLIC WORKS DIRECTOR/CITY ENGINEER,	
<input type="checkbox"/> CDP-19	ACCUMULATED GROUND MOVEMENT SURVEY	24.D	OIL FIELD OPERATOR	Within 60 days of approval of the Accumulated Ground Movement Plan, and conducted annually + for five years after completion of drilling operations at City IOF	COMMUNITY DEVELOPMENT DIRECTOR AND PUBLIC WORKS DIRECTOR/CITY ENGINEER,	
<input type="checkbox"/> CDP-20	SEISMIC ACTIVITY TRACKING SYSTEM (AND SUBSEQUENT INSPECTIONS AND REPORTING)	24.G	OIL FIELD OPERATOR	Within 180 days of Comprehensive Drilling Plan with annual reports and with ongoing periodic inspections following a 0.13g ground acceleration activity	COMMUNITY DEVELOPMENT DIRECTOR AND PUBLIC WORKS DIRECTOR/CITY ENGINEER	
<input type="checkbox"/> CDP-21	EROSION CONTROL PLAN	24.H	OIL FIELD OPERATOR	Within 180 days of Comprehensive Drilling Plan with ongoing monitoring	PUBLIC WORKS DIRECTOR/CITY ENGINEER	
<input type="checkbox"/> CDP-22	GROUNDWATER MONITORING PROGRAM	25	OIL FIELD OPERATOR	Within 180 days of Comprehensive Drilling Plan with ongoing monitoring annually	PUBLIC WORKS DIRECTOR/CITY ENGINEER	
<input type="checkbox"/> CDP-23	SURFACE WATER MANAGEMENT PLAN	26.A	OIL FIELD OPERATOR	Within 180 days of Comprehensive Drilling Plan with triennial updates (or as often as needed)	PUBLIC WORKS DIRECTOR/CITY ENGINEER	

	PERMIT/PLAN/REPORT/ACTION TITLE	DRILLING REGULATIONS SECTION No.	TO BE PROVIDED OR CONDUCTED BY	SUBMITTAL DUE DATE GUIDELINE	TO BE REVIEWED/APPROVED BY	COMMENTS
<input type="checkbox"/> CDP-24	STORMWATER POLLUTION PREVENTION PLAN (SWPPP)	27.A	OIL FIELD OPERATOR	Concurrent with Comprehensive Drilling Plan with biennial updates (or as often as needed)	CITY COUNCIL (INITIAL PLAN) & PUBLIC WORKS DIRECTOR/CITY ENGINEER (BIENNEL REVIEW)	
<input type="checkbox"/> CDP-25	SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN (SPCCP)	27.B	OIL FIELD OPERATOR	Concurrent with Comprehensive Drilling Plan with biennial updates (or as often as needed)	CITY COUNCIL (INITIAL PLAN) & PUBLIC WORKS DIRECTOR/CITY ENGINEER (BIENNEL REVIEW)	
<input type="checkbox"/> CDP-26	RECYCLING AND REMOVAL PLAN	28.C	OIL FIELD OPERATOR	Initial plan within 180 days of Comprehensive Drilling Plan	PUBLIC WORKS DIRECTOR/CITY ENGINEER	
<input type="checkbox"/> CDP-27	SPECIAL STATUS SPECIES AND HABITAT PROTECTION PLAN	29.B	OIL FIELD OPERATOR	Initial plan within 180 days of Comprehensive Drilling Plan and then reviewed/updated annually concurrent with each Annual Plan	PUBLIC WORKS DIRECTOR/CITY ENGINEER	
<input type="checkbox"/> CDP-28	ACTIVE PIPELINE PLOT PLAN	34.F	OIL FIELD OPERATOR	Within 1 year of Comprehensive Drilling Plan and otherwise within 30 days of any changes		
<input type="checkbox"/> CDP-29	TRANSPORTATION RISK MANAGEMENT AND PREVENTION PLAN	34.I	OIL FIELD OPERATOR	Initial plan within 180 days of Comprehensive Drilling Plan and then reviewed/updated (with biennial audits) every 2 years thereafter	PUBLIC WORKS DIRECTOR/CITY ENGINEER	
<input type="checkbox"/> CDP-30	LIGHTING PLAN	36.B	OIL FIELD OPERATOR	Concurrent with Comprehensive Drilling Plan and each Annual Plan	COMMUNITY DEVELOPMENT DIRECTOR	
<input type="checkbox"/> CDP-31	LANDSCAPE PLAN	37.A	OIL FIELD OPERATOR	Concurrent with Comprehensive Drilling Plan and each Annual Plan	COMMUNITY DEVELOPMENT DIRECTOR	

	PERMIT/PLAN/REPORT/ACTION TITLE	DRILLING REGULATIONS SECTION NO.	TO BE PROVIDED OR CONDUCTED BY	SUBMITTAL DUE DATE GUIDELINE	TO BE REVIEWED/APPROVED BY	COMMENTS
<input type="checkbox"/> CDP-32	PERIMETER AND ENTRANCE IDENTIFICATION SIGNS (INSTALLED)	39	OIL FIELD OPERATOR	Installed within 60 days of Comprehensive Drilling Plan	COMMUNITY DEVELOPMENT DIRECTOR	
<input type="checkbox"/> CDP-33	ABANDONED AND UNUSED EQUIPMENT REMOVAL PLAN	40.A	OIL FIELD OPERATOR	Concurrent with Comprehensive Drilling Plan and each Annual Plan	CITY COUNCIL (INITIAL PLAN); PUBLIC WORKS DIRECTOR/CITY ENGINEER (ANNUAL PLANS)	
<input type="checkbox"/> CDP-34	REPAINTING OF OIL FIELD STRUCTURES	41.D	OIL FIELD OPERATOR	Within 2 years of Comprehensive Drilling Plan and every 2 years thereafter	COMMUNITY DEVELOPMENT DIRECTOR	
<input type="checkbox"/> CDP-35	ABANDONED WELL TESTING	48	OIL FIELD OPERATOR	Quarterly testing, commencing within 120 days of Comprehensive Drilling Plan	PUBLIC WORKS DIRECTOR/CITY ENGINEER (& DOGGR)	
ANNUAL CONSOLIDATION AND DRILLING PLAN						
<input type="checkbox"/> ACDP-1	ANNUAL CONSOLIDATION AND DRILLING PLAN (ANNUAL CONSOLIDATION AND DRILLING, REDRILLING, WELL ABANDONMENT AND WELL PAD RESTORATION PLAN)	3B, 4A, 31.B	OIL FIELD OPERATOR	Annually (by end of prior calendar year for upcoming year)	COMMUNITY DEVELOPMENT DIRECTOR	
<input type="checkbox"/> ACDP-2	CONDITION COMPLIANCE PLAN	7.A	OIL FIELD OPERATOR	Reviewed annually with Annual Plan (following initial submittal/approval with Comprehensive Drilling Plan)	CITY COUNTY (INITIAL PLAN) COMMUNITY DEVELOPMENT DIRECTOR (ANNUAL PLANS AND AMENDMENTS)	
<input type="checkbox"/> ACDP-3	CLEAN TECHNOLOGY ASSESSMENT	11.B	OIL FIELD OPERATOR	With Annual Plan	COMMUNITY DEVELOPMENT DIRECTOR	
<input type="checkbox"/> ACDP-4	SPILL CONTAINMENT RESPONSE TRAINING	12.F	OIL FIELD OPERATOR	Reviewed annually with Annual Plan (following initial submittal/approval with Comprehensive Drilling Plan)	COMMUNITY DEVELOPMENT DIRECTOR AND FIRE CHIEF	

	PERMIT/PLAN/REPORT/ACTION TITLE	DRILLING REGULATIONS SECTION No.	TO BE PROVIDED OR CONDUCTED BY	SUBMITTAL DUE DATE GUIDELINE	TO BE REVIEWED/APPROVED BY	COMMENTS
<input type="checkbox"/> ACDP-5	COMMUNITY ALERT NOTIFICATION SYSTEM (INSTALLED AND TESTING)	12.H	OIL FIELD OPERATOR	Reviewed annually with Annual Plan (following initial submittal/approval with Comprehensive Drilling Plan)	FIRE CHIEF AND POLICE CHIEF	
<input type="checkbox"/> ACDP-6	ODOR MINIMIZATION PLAN	21.B	OIL FIELD OPERATOR	Reviewed annually with Annual Plan (following initial submittal/approval with Comprehensive Drilling Plan)	COMMUNITY DEVELOPMENT DIRECTOR	
<input type="checkbox"/> ACDP-7	AIR MONITORING PLAN	21.C	OIL FIELD OPERATOR	Reviewed annually with Annual Plan (following initial submittal/approval with Comprehensive Drilling Plan)	COMMUNITY DEVELOPMENT DIRECTOR	
<input type="checkbox"/> ACDP-8	QUIET MODE DRILLING PLAN (AND NOISE ATTENUATION MEASURES)	22.C	OIL FIELD OPERATOR	Reviewed annually with Annual Plan (following initial submittal/approval with Comprehensive Drilling Plan)	CITY COUNCIL (INITIAL PLAN); COMMUNITY DEVELOPMENT DIRECTOR (ANNUAL REVIEW)	
<input type="checkbox"/> ACDP-9	ACCUMULATED GROUND MOVEMENT PLAN	24.C	OIL FIELD OPERATOR	Reviewed annually with Annual Plan (following initial submittal/approval with Comprehensive Drilling Plan)	COMMUNITY DEVELOPMENT DIRECTOR AND PUBLIC WORKS DIRECTOR/CITY ENGINEER,	
<input type="checkbox"/> ACDP-10	ACCUMULATED GROUND MOVEMENT SURVEY	24.D	OIL FIELD OPERATOR	Reviewed annually with Annual Plan (following initial submittal/approval with Comprehensive Drilling Plan)	COMMUNITY DEVELOPMENT DIRECTOR AND PUBLIC WORKS DIRECTOR/CITY ENGINEER,	

	PERMIT/PLAN/REPORT/ACTION TITLE	DRILLING REGULATIONS SECTION No.	TO BE PROVIDED OR CONDUCTED BY	SUBMITTAL DUE DATE GUIDELINE	TO BE REVIEWED/APPROVED BY	COMMENTS
<input type="checkbox"/> ACDP-11	SEISMIC ACTIVITY TRACKING SYSTEM (AND SUBSEQUENT INSPECTIONS AND REPORTING)	24.G	OIL FIELD OPERATOR	Reviewed annually with Annual Plan (following initial submittal/approval with Comprehensive Drilling Plan)	COMMUNITY DEVELOPMENT DIRECTOR AND PUBLIC WORKS DIRECTOR/CITY ENGINEER	
<input type="checkbox"/> ACDP-12	GROUNDWATER MONITORING PROGRAM	25	OIL FIELD OPERATOR	Reviewed annually with Annual Plan (following initial submittal/approval with Comprehensive Drilling Plan)	PUBLIC WORKS DIRECTOR/CITY ENGINEER	
<input type="checkbox"/> ACDP-13	SPECIAL STATUS SPECIES AND HABITAT PROTECTION PLAN	29.B	OIL FIELD OPERATOR	Reviewed annually with Annual Plan (following initial submittal/approval with Comprehensive Drilling Plan)	PUBLIC WORKS DIRECTOR/CITY ENGINEER	
<input type="checkbox"/> ACDP-14	LIGHTING PLAN	36.B	OIL FIELD OPERATOR	Concurrent with Comprehensive Drilling Plan and each Annual Plan	COMMUNITY DEVELOPMENT DIRECTOR	
<input type="checkbox"/> ACDP-15	LANDSCAPE PLAN	37.A	OIL FIELD OPERATOR	Concurrent with Comprehensive Drilling Plan and each Annual Plan	COMMUNITY DEVELOPMENT DIRECTOR	
<input type="checkbox"/> ACDP-16	ABANDONED AND UNUSED EQUIPMENT REMOVAL PLAN	40.A	OIL FIELD OPERATOR	Concurrent with Comprehensive Drilling Plan and each Annual Plan	CITY COUNCIL (INITIAL PLAN); PUBLIC WORKS DIRECTOR/CITY ENGINEER (ANNUAL PLANS)	
<input type="checkbox"/> ACDP-17	PRODUCTION REPORT	45	OIL FIELD OPERATOR	Annually	COMMUNITY DEVELOPMENT DIRECTOR	

	PERMIT/PLAN/REPORT/ACTION TITLE	DRILLING REGULATIONS SECTION No.	TO BE PROVIDED OR CONDUCTED BY	SUBMITTAL DUE DATE GUIDELINE	TO BE REVIEWED/APPROVED BY	COMMENTS
DEEP-ZONE SUPPLEMENT TO THE ANNUAL CONSOLIDATION AND DRILLING PLAN						
<input type="checkbox"/> DZSuP-1	DEEP-ZONE SUPPLEMENT TO THE ANNUAL CONSOLIDATION AND DRILLING PLAN	21.J.2, 31.C	OIL FIELD OPERATOR	Concurrent with Annual Plan	COMMUNITY DEVELOPMENT DIRECTOR	
MID-ZONE SUPPLEMENT TO THE ANNUAL CONSOLIDATION AND DRILLING PLAN						
<input type="checkbox"/> MZSUP-1	MID-ZONE SUPPLEMENT TO THE ANNUAL CONSOLIDATION AND DRILLING PLAN	21.J.2	OIL FIELD OPERATOR	City to Approve	COMMUNITY DEVELOPMENT DIRECTOR	
SPECIAL REVIEW DRILLING SITE WITHIN 400-FOOT SETBACK BUFFER						
<input type="checkbox"/> SR-1	SPECIAL REVIEW DRILLING SITE WITHIN 400-FOOT SETBACK BUFFER		OIL FIELD OPERATOR	Prior to any Drilling or Redrilling	CITY COUNCIL	
DRILLING USE PERMIT						
<input type="checkbox"/> DUP-1	DRILLING USE PERMIT	3C, 4A	OIL FIELD OPERATOR	Prior to any Drilling or Redrilling	COMMUNITY DEVELOPMENT DIRECTOR	
<input type="checkbox"/> DUP-2	LEAK DETECTION AND CONTROL PLAN	15.F	OIL FIELD OPERATOR	Initial plan within 180 days of Comprehensive Drilling Plan and then with each Drilling Use Permit	COMMUNITY DEVELOPMENT DIRECTOR AND FIRE CHIEF	
<input type="checkbox"/> DUP-3	DIRECTION DRILLING SURVEY	42	OIL FIELD OPERATOR	Within 60 days per each Drilling Use Permit drilling project, as applicable/required	COMMUNITY DEVELOPMENT DIRECTOR	

	PERMIT/PLAN/REPORT/ACTION TITLE	DRILLING REGULATIONS SECTION No.	TO BE PROVIDED OR CONDUCTED BY	SUBMITTAL DUE DATE GUIDELINE	TO BE REVIEWED/APPROVED BY	COMMENTS
OTHER PERMITS						
	CONSTRUCTION PERMITS (GRADING, CONSTRUCTION, BUILDING, MECHANICAL, ETC.)		OIL FIELD OPERATOR	Prior to any site clearance, grading or construction	COMMUNITY DEVELOPMENT DIRECTOR, PUBLIC WORKS DIRECTOR/CITY ENGINEER, FIRE CHIEF OR SCAQMD (AS APPROPRIATE)	
	OPERATIONAL PERMIT (ANNUAL OR TEMPORARY)	12.A	OIL FIELD OPERATOR	Prior to establishing new well or facilities via City Fire Protection Division	FIRE CHIEF	
	GEOTECHNICAL INVESTIGATION (SITE-SPECIFIC FOR ANY GRADING IN EXCESS OF 1,000 CUBIC YARDS OR PERMANENT STRUCTURES)	24.B	OIL FIELD OPERATOR	Required with each construction or grading permit	PUBLIC WORKS DIRECTOR/CITY ENGINEER,	
	HOT WORK PERMIT	16.B	OIL FIELD OPERATOR	As needed per California Fire Code through the Fire Chief	FIRE CHIEF	
	FAULT INVESTIGATION REPORT	24.F	OIL FIELD OPERATOR	Required to construct any structure across an active fault or within the Alquist- Priolo Earthquake fault zone (at time of Building Permit)	BUILDING OFFICIAL	
	HYDROLOGIC ANALYSIS	27.C	OIL FIELD OPERATOR	With each Grading Permit	PUBLIC WORKS DIRECTOR/CITY ENGINEER	
	ARCHAEOLOGICAL TRAINING REPORTING	30.A	OIL FIELD OPERATOR	Prior to/concurrent with groundbreaking activity (each event), with Grading or Building Permit(s)	COMMUNITY DEVELOPMENT DIRECTOR	

	PERMIT/PLAN/REPORT/ACTION TITLE	DRILLING REGULATIONS SECTION No.	TO BE PROVIDED OR CONDUCTED BY	SUBMITTAL DUE DATE GUIDELINE	TO BE REVIEWED/APPROVED BY	COMMENTS
	CULTURAL RESOURCES ASSESSMENT	30.B	OIL FIELD OPERATOR	Prior to/concurrent with groundbreaking activity (each event), with Grading or Building Permit(s)	COMMUNITY DEVELOPMENT DIRECTOR	
	PRIVATE ROAD CONSTRUCTION PLAN	38.B	OIL FIELD OPERATOR	As required	PUBLIC WORKS DIRECTOR/CITY ENGINEER	
AMENDMENTS TO COMPREHENSIVE DRILLING PLAN OR ANNUAL CONSOLIDATION AND DRILLING PLAN						
	<i>See requirements for Comprehensive Drilling Plan and/or Annual Consolidation and Drilling Plan.</i>		OIL FIELD OPERATOR		CITY COUNCIL (COMPREHENSIVE DRILLING PLAN AMENDMENT) COMMUNITY DEVELOPMENT DIRECTOR (ANNUAL CONSOLIDATION AND DRILLING PLAN AMENDMENT)	

	PERMIT/PLAN/REPORT/ACTION TITLE	DRILLING REGULATIONS SECTION No.	TO BE PROVIDED OR CONDUCTED BY	SUBMITTAL DUE DATE GUIDELINE	TO BE REVIEWED/APPROVED BY	COMMENTS
ABANDONMENT PLANS						
	WELL AND WELL PAD ABANDONMENT PLAN	49	OIL FIELD OPERATOR	Within 180 days prior to permanent shut down	COMMUNITY DEVELOPMENT DIRECTOR, PUBLIC WORKS DIRECTOR/CITY ENGINEER AND FIRE CHIEF	
	OIL FIELD ABANDONMENT PLAN	51	OIL FIELD OPERATOR	Within 180 days prior to permanent shut down	COMMUNITY DEVELOPMENT DIRECTOR, PUBLIC WORKS DIRECTOR/CITY ENGINEER AND FIRE CHIEF (& DOGGR)	
TRAINING, DRILLS AND INSPECTIONS						
<input type="checkbox"/> TDI-1	ON-SITE MONITOR	7.B, 9.E, 21.C.2, 52.D, 53	THIRD PARTY (HIRED BY CULVER CITY)	At the City's discretion	COMMUNITY DEVELOPMENT DIRECTOR	
<input type="checkbox"/> TDI-2	CITY (AQ) TESTING	21.C.2	CULVER CITY OR THIRD PARTY (HIRED BY CULVER CITY)	Grab sample testing as determined following event of a gas leak	COMMUNITY DEVELOPMENT DIRECTOR	
<input type="checkbox"/> TDI-3	OFF-ROAD DIESEL CONSTRUCTION EQUIPMENT ENGINES AND DRILL RIG ENGINES – CERTIFICATIONS AND CARB VERIFICATIONS	21.H , 21.I	OIL FIELD OPERATOR	Provide verifications as per CARB/SCAQMD for all “construction” engine and drill rig engine activity	COMMUNITY DEVELOPMENT DIRECTOR	

	PERMIT/PLAN/REPORT/ACTION TITLE	DRILLING REGULATIONS SECTION NO.	TO BE PROVIDED OR CONDUCTED BY	SUBMITTAL DUE DATE GUIDELINE	TO BE REVIEWED/APPROVED BY	COMMENTS
<input type="checkbox"/> TDI-4	INSPECTION AND MAINTENANCE PROGRAM INFORMATION RECORDS (AS REQUIRE/PROVIDED TO SCAQMD, CARB, EPA)	21.L	OIL FIELD OPERATOR	As determined and upon request	COMMUNITY DEVELOPMENT DIRECTOR	
<input type="checkbox"/> TDI-5	GREENHOUSE GAS RECORDKEEPING AND CAP AND TRADE PROGRAM INFORMATION (GREENHOUSE GASES INVENTORIES AND INVENTORY VERIFICATION AS REQUIRE/PROVIDED TO SCAQMD, CARB, EPA)	21.M	OIL FIELD OPERATOR	As determined and upon request	COMMUNITY DEVELOPMENT DIRECTOR	
<input type="checkbox"/> TDI-6	EQUIPMENT SERVICE LOG (FOR ALL NOISE-PRODUCING EQUIPMENT)	22.E and 22 H	OIL FIELD OPERATOR	Ongoing; for City review as determined and upon request	COMMUNITY DEVELOPMENT DIRECTOR	
<input type="checkbox"/> TDI-7	DUPLICATE NOTICES (TO CITY)	43	OIL FIELD OPERATOR	Ongoing per occurrence	COMMUNITY DEVELOPMENT DIRECTOR	
<input type="checkbox"/> TDI-8	INSPECTION OF PREMISES	44	CULVER CITY OR THIRD PARTY (HIRED BY CULVER CITY)	Ongoing as determined by the City	COMMUNITY DEVELOPMENT DIRECTOR, PUBLIC WORKS DIRECTOR/CITY ENGINEER AND FIRE CHIEF	
<input type="checkbox"/> TDI-9	IDLE WELL TESTING (& MAINTENANCE)	46	OIL FIELD OPERATOR	In accordance with DOGGR schedule/ requirements	PUBLIC WORKS DIRECTOR/CITY ENGINEER (& DOGGR)	
<input type="checkbox"/> TDI-10	SAFETY, INSPECTION, MAINTENANCE AND QUALITY ASSURANCE PROGRAM (SIMQAP)	52.A	OIL FIELD OPERATOR	Initial plan within 180 days of Comprehensive Drilling Plan and reviewed every 5 years	COMMUNITY DEVELOPMENT DIRECTOR AND FIRE CHIEF	

	PERMIT/PLAN/REPORT/ACTION TITLE	DRILLING REGULATIONS SECTION No.	TO BE PROVIDED OR CONDUCTED BY	SUBMITTAL DUE DATE GUIDELINE	TO BE REVIEWED/APPROVED BY	COMMENTS
<input type="checkbox"/> TDI-11	COMPLIANCE AND SAFETY AUDITS	53	CULVER CITY OR THIRD PARTY (HIRED BY CULVER CITY)	As determined necessary by the Community Development Director and/or Fire Chief	COMMUNITY DEVELOPMENT DIRECTOR AND FIRE CHIEF	
<input type="checkbox"/> TDI-12	COMPLAINT LOG	54	OIL FIELD OPERATOR	Ongoing	COMMUNITY DEVELOPMENT DIRECTOR AND FIRE CHIEF	
EVENT OR INCIDENT REPORTING, REVIEW OR ACTION						
	REMEDIATION	9.C.2	OIL FIELD OPERATOR	As need arises due to incident	FIRE CHIEF	
	SITE ASSESSMENT	12.J	OIL FIELD OPERATOR	As determined by the Fire Chief following any spill	FIRE CHIEF	
	PORTABLE FLARE (FOR DRILLING) LOG/NOTIFICATIONS	21.D	OIL FIELD OPERATOR	Notification per event; documented in the drilling log	FIRE CHIEF AND SCAQMD	
	OIL TANK PRESSURE MONITORING/VENTING LOG/NOTIFICATIONS (WITH INCIDENT REPORT PER EVENT)	21.E	OIL FIELD OPERATOR	Notification per alarm event; documented in the applicable inspection and maintenance log	FIRE CHIEF AND SCAQMD	
	ODOR SUPPRESSANT SPRAY SYSTEM	21.F	OIL FIELD OPERATOR	Used on the mud shaker tables for all drilling, redrilling, well stimulation and well reworking operations	FIRE CHIEF AND SCAQMD	

CULVER CITY GENERAL PLAN POLICY STATEMENT	CONSISTENCY DETERMINATION AND DISCUSSION
NE Policy 2.B. Require addition of noise reduction features to all existing and proposed stationary-related noise sources which exceed established noise standards to reduce impacts on noise sensitive land uses.	Consistent. See Responses to NE Objective 1 and NE Policies 1.D and 1.E.
NE Policy 2.D: Pro-actively enforce noise amplification laws concerning nuisances such as car radios, garage bands, boom boxes, and car alarms.	Consistent. See Responses to NE Objective 1 and NE Policies 1.D and 1.E.
NE Objective 3. Transportation-Related Noise Sources. Protect those areas that are or may be subjected to unacceptable noise from transportation noise sources.	Consistent. See Responses to NE Objective 1 and CE Policies 1.A.
NE Policy 3.F. Limit truck movements to those arterials designed to handle the traffic, and those located farther from noise sensitive areas.	Consistent. See Responses to NE Objective 1 and CE Policies 1.A.