Oil Drilling Subcommittee

Discussion and Updates Related to the Inglewood Oil Field

Wednesday, October 30, 2019
6:00 to 7:30 PM

Mike Balkman Council Chambers – City Hall
9770 Culver Blvd, Culver City, CA 90232
Meeting Agenda

• Discussion of Baldwin Hills Community Standards District (CSD) 5-Year Periodic Review II (for 2014 to 2018)
• Discussion of CSD Health Assessment & Environmental Justice Study
• Update of Inglewood Oil Field and oil & gas related programs
• Other news and announcements
CSD 5-Year Review II

- The county shall conduct a comprehensive review of the provisions of the CSD at least every five years to determine if the provisions of the CSD are adequately protecting the health, safety, and general welfare.

- Such reviews shall, among other things, consider whether additional provisions should be added, appended, or removed.

- One of the main goals of the Periodic Review shall be to evaluate if proven technological advances that would further reduce impacts of oil operations on neighboring land uses should be incorporated into the provisions.
CSD 5-Year Review II


- A copy of the Draft Periodic Review II Report, along with other relevant background and information on how to submit comments, is available at the County’s CSD website. http://planning.lacounty.gov/baldwinhills/review2

- Comments should be submitted to Timothy Stapleton, AICP, via e-mail: tstapleton@planning.lacounty.gov or U.S. mail: Timothy Stapleton, Land Use Regulation Division, Department of Regional Planning, 320 W. Temple Street, Los Angeles, CA 90012.
CSD 5-Year Review II

- Conduct Comprehensive Analysis of CSD
  - Complaint Log
  - EQAP Audits
  - Enforcement Actions
  - Operations/Maintenance Records
  - MACC Agency Records and Discussions
  - Review of CSD/SA Studies
  - SIMQAP Audits

- Initial Draft Report
  - Results of CSD Provision Analysis
  - Result of Technical Advances Study
  - Recommendations

- Review of Initial Draft Report
  - CAP
  - SPR
  - MACC Agencies

- Final Draft Report
  - Modifications to Initial Draft Report
  - Comments from Reviewers
  - Response to Comments

- Public Meeting Before Hearing Officer

- Final Report Issued by Hearing Officer

- Stakeholder Input
  - January-May 2019

- Release Initial Draft Report
  - September 24, 2019

- Public Comment Period
  - 60 Days from Release of Initial Draft Report
  - Ends November 23, 2019

- Public Meeting Before Hearing Officer
  - First Quarter 2020
CSD 5-Year Review II

- Five recommendations
- Recommendation versus requirement or change to CSD
- Four of five recommendations enforceable by the existing CSD ordinance
  - Three involve a change in the implementation of the provision
  - One involves a change in the compliance effort of the provision
- One recommendation to be monitored for effectiveness
  - Continue existing operational practices
- Approach allows for Improvements to the CSD without need to go through process of “opening” the ordinance to revisions
County Recommendation #1: Based on public input, it is recommended the operator consider the use of an alternate geotechnical engineering firm for the property damage complaint follow-up investigations. The use of an alternate firm would bring an additional team of subject matter experts to the issue. [CSD provision 22.310.050.D]

Change in the implementation of the provision

County Recommendation #2: Based on evidence of some incomplete complaint data, it is recommended that the operator meet with staff involved with the complaint process and the 1-800 telephone line vendor to review the required information necessary for filing a complete complaint. Better complaint documentation will improve the quality of the data collected for a complaint, assist in investigation of the complaint, and therefore upgrade the complaint process and data base. [CSD provision 22.310.060.G]

Change in the implementation of the provision
County Recommendation #3: To improve the communication of oil field activities to the public it is recommended that the operator post updates of oil field incidents on the oil field website. [CSD provision 22.310.100.B.3]

Change in the implementation of the provision

County Recommendation #4: Due to the fact that unannounced drills have not taken place in the past, it is recommended that efforts be made to ensure that unannounced drills take place at the oil field as required by the provision of the CSD. The Department of Regional Planning will coordinate with the Fire Department to ensure that unannounced drills occur in the future. [CSD provision 22.310.060.D]

Change in the compliance effort of the CSD provision

(22.310.060.D allows for up to two unannounced drills per year)
CSD 5-Year Review II

- **County Recommendation #5:** Recommendation that the Operator continue the use of metal and or plastic bins and tanks consistent with current practice as the elimination of the use of below ground sumps is considered to be a significant environmental benefit. [CSD provision 22.310.050.O]
  - *Recommendation to continue existing operation practice*
CSD 5-Year Review II
Culver City Comment Items

1. **Well Stimulation** – Revise the CSD to prohibit the process of well stimulation.

2. **Landscaping and Aesthetics** – Require that the CSD acknowledge the view shed from Culver City and require that visual impacts for along the entire perimeter of the Oil Field be mitigated.

3. **Funding of CSD Review and Related Studies** - Require enforcement provisions that state the County may take whatever measures are necessary to ensure that adequate funding exists to cover the cost of preparation of accurate and reliable studies that are required under the CSD.
• 4. **Notifications and Public Notices** – Require improved communication and notifications between all interested parties. County should not rely on the CAP to notify the public of important information regarding the Oil Field operations, especially events that may be time-sensitive and that may have interests beyond the outreach of the CAP members.

• 5. **Ground Movement Survey** - The County should re-evaluate the provisions for review of Oil Field caused subsidence and concerns of property damage to structures in the surrounding area.

• 6. **Improved Multiple-Agency Coordination Joint Meeting** – Require that the CAP and Multiple-Agency Coordination Committee (MACC) meet, at minimum, on an annual basis to better communicate with and inform each other and the public about issues relating to the Oil Field operations.
CSD 5-Year Review II
Culver City Comment Items

• 7. **Emergency Response Review** – Review the emergency response programs and update CSD regulations accordingly to ensure that the best emergency response plans, including notification and evacuation routes, are in place and that individual neighborhoods are better informed about such plans.

• 8. **Greenhouse Gas Emissions, Air Quality & Public Health** – Require updated studies to inform/confirm whether enhanced CSD regulations addressing air emissions, including the emission of toxic air contaminants and greenhouse gases should be incorporated to ensure the public health, safety and general welfare. Consider establishing an accurate inventory of annual GHG emissions from the Oil Field and consider meaningful and effective ways to mitigate those emissions both from stationary sources and fugitive sources. Consider establishing an accurate inventory of toxic air contaminants from the Oil Field and work cooperatively with public health agencies to implement effective means to mitigate those emissions and establish appropriate contingency measures.

• 9. **Evaluation and Determination of New Technology** – Revise the CSD to clarify the standard for identification and review of new technology and provide specific guidelines for how potential new technologies are reviewed and evaluated.
CSD 5-Year Review II
Culver City Comment Items

• 10. **Insurance and Bonding** – Require ongoing review of the insurance coverage and bonded security requirements and make valid recommendations for identifying adequate coverage requirements under the CSD.

• 11. **CAP Function and Membership** – Request that improved guidelines be established to clarify the function of and participation with the CAP.

• 12. **Accommodation for Changing Conditions Related to Climate Change and DOGGR Regulation** – Continual review and evaluation as to how changes within the regulatory background, since adoption of the CSD, may affect the relevancy of standards under the CSD, including the schedules for monitoring and reporting.
CSD 5-Year Review II
Culver City Comment Items

• Additional Comments ???
CSD Health Assessment and Environmental Justice Study

- The Baldwin Hills CSD Settlement Agreement requires that the County complete a Community Health Assessment of the communities surrounding the Inglewood Oil Field by June 2012 and additional assessments every five to seven years thereafter.

- The Community Health Assessment is to be completed by the County Department of Public Health (DPH).

- DPH shall review other agency reports regarding air quality, water quality and seismic data where feasible.

- DPH shall analyze the information by socio-economic and demographic groups to reflect an environmental justice context.

- DPH is developing a scope of work and study design for the upcoming cycle of the Health Assessment/Environmental Justice Study.
CSD Health Assessment and Environmental Justice Study

Settlement Agreement #5:

- **Health Assessment and Environmental Justice Study.** The County shall complete a Community Health Assessment of the communities surrounding the Oil Field which shall include an Environmental Justice component by June 2012 and ensure additional assessments are completed every five to seven years throughout the life of the CSD. In future Community Health Assessments, the County Department of Public Health ("Public Health") shall review other agencies' reports regarding air quality, water quality and seismic data, where feasible, in its assessment. Public Health will analyze the information by socio-economic and demographic data to accommodate and reflect an Environmental Justice component. The Community Health Assessment shall include, but not be limited to, an analysis of cancer rates, mortality rates, birth outcomes and a survey of other pertinent health indicators. The County will consult with the CAP and the Health Working Group regarding the Community Health Assessment and consider reasonable comments by the CAP and the Health Working Group. Public Health will comply with all applicable state and federal requirements including Title VI of the Civil Rights Act of 1964 and corresponding regulations, and California Government Code Section 11135 and corresponding regulations.
CSD Health Assessment and Environmental Justice Study

Baldwin Hills CAP Assessment: Draft overview diagram of process

Phase 1: Formative Work
- Select consultants and establish steering committee (SC)
- Meet to review formative findings and calendar phase 2 activities (SC)
- Meet to develop Phase 3 specific aims, goals, objective and outline study design and components (SC)
- Conduct formative survey
- Review published studies
- Summarize formative findings; draft possible 3-phase model
- Present 3-phase model to HWG; take feedback and input
- Draft Phase 2 Scope of Work (SOW)
- Obtain CAP input on and endorsement of Phase 2 SOW
- Secure DPH approval and Identify funding mechanism
- Finalize and release Phase 2 SOW

Phase 2: Scoping
- Conduct pilot testing of materials and methods (contractor)
- Review pilot test (DPH and CAP); finalize data collection and analysis plan (contractor)
- Collect data (contractor)
- Analyze data (contractor)
- Meet with CAP to present analyses and take input from to contextualize findings (contractor)
- Create final report (contractor)

Phase 3: Implementation and Analysis

*Steering committee to consist of up to 3 academic experts; CAP health working group members; DPH staff; CARB representative.

1/18/19
CSD Health Assessment and Environmental Justice Study

- **What Questions Should the Health Assessment and Environmental Justice (HA/EJ) Study Address?**

  - Input on the HA/EJ Study can be submitted through the CSD Community Advisory Panel (CAP) or directly to Culver City IOF Project Manager, Melanie Traxler via email: mtraxlerpplus@aol.com

  - Comments addressing the scope of work for the HA/EJ Study should be submitted by December 13, 2019.
Updates on Inglewood Oil Field and Other Oil & Gas Related Issues

Baldwin Hills Community Standards District (CSD)

- Baldwin Hills CSD Community Advisory Panel (CAP) Meetings
- CSD 5-Year Periodic Review II
- County Department of Public Health’s CSD Health Assessment and Environmental Justice Study
Updates on Inglewood Oil Field and Other Oil & Gas Related Issues

Outside Agencies on Oil & Gas

• California Air Resources Board (CARB) – Study of Neighborhood Air near Petroleum Sources (SNAPS)
• Los Angeles County Department of Public Health (DPH) – Community Health Improvement Plan (CHIP)
• Division of Oil, Gas and Geothermal Resources (DOGGR) – Underground Injection Compliance (UIC) Program
• DOGGR Regulations & Rulemaking Review
Updates on Inglewood Oil Field and Other Oil & Gas Related Issues

DPH Community Health Improvement Plan (CHIP)

### HEALTH PROTECTION & MITIGATION

<table>
<thead>
<tr>
<th>Strategy</th>
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<tbody>
<tr>
<td>1. Expand the minimum setback distances for oil and gas operations from sensitive land uses to protect the health and safety of the surrounding community.</td>
<td>CSO Sustainability Plan; LA City Sustainability Plan</td>
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<td>2. Collaborate with the City of Los Angeles and other local jurisdictions to develop a sunset strategy for all oil and gas operations that prioritizes disproportionately affected communities.</td>
<td>CSO Sustainability Plan; LA City Sustainability Plan</td>
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<td>3. Support the implementation of emissions capture and reduction plans including leak detection and repair requirements, implementation of best available control technology, implementation of abatement best practices, as well as potential development of pathways to facility closure.</td>
<td>LA City Sustainability Plan</td>
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<td>4. Support local and Statewide effort to eliminate the use of hydraulic fracturing.</td>
<td>Key Informants, DPH &amp; Board Priority</td>
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### JUST & EQUITABLE TRANSITION TO A CLEANER ECONOMY

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<td>1. Collaborate with local jurisdictions, unions, community-based organizations, education institutions, and the private sector to develop a just transition plan and task force that examines the impact of the transition to a cleaner economy on disadvantaged workers, identifies strategies for supporting displaced workers, and develops recommendations for ensuring inclusive employment practices within growth sectors of the clean economy.</td>
<td>CSO Sustainability Plan; LA City Sustainability Plan</td>
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<td>2. Partner with community-based organizations, educational institutions, unions, and the private sector to develop, connect and place workers within high quality apprenticeship programs, meaningful on-the-job training, and employment opportunities with employers within growth sectors of the clean economy.</td>
<td>CSO Sustainability Plan; LA City Sustainability Plan</td>
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<td>3. Complete development and initiate implementation of the County of Los Angeles’ Green Zones Program in the unincorporated areas.</td>
<td>CSO Sustainability Plan</td>
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<td>4. Support policies and programs that expand zero-emission vehicle infrastructure and promote equitable access and affordability.</td>
<td>CSO Sustainability Plan; LA City Sustainability Plan</td>
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<td>5. Study and implement best practices to maximize program enrollment and benefits in low-income rate assistance, energy efficiency and conservation and clean energy rebate and incentive programs, including proactive strategies to include: renters; people with disabilities; underserved immigrants; people with limited English proficiency; and other communities traditionally left out of those programs.</td>
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### DATA COLLECTION, MONITORING, & INFORMATION SHARING

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<td>1. Partner with community-based organizations, school districts, and operators to deploy community and source line air monitoring to identify and analyze local air contaminants, improve emissions regulations and expand enforcement resources for these regulations. Use Coal in the Great Basin or other health equity tools to prioritize deployment of air monitoring in disproportionately affected communities.</td>
<td>CSO Sustainability Plan; LA City Sustainability Plan</td>
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<td>2. Conduct an inventory to identify all abandoned and idle oil and gas infrastructure in LA County, prioritize these by condition and proximity to sensitive populations and develop and implement a closure plan that includes identification of potential funding sources.</td>
<td>CSO Sustainability Plan; LA City Sustainability Plan</td>
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<td>3. Require oil and gas facility operators to prepare and make available to the public a comprehensive Community Safety Plan, in coordination with the local community, as well as City and County departments. Plans should be enforceable and specific to the unique needs of the community. Plans should include operations information, including chemicals used, operation times, and planned maintenance schedules, as well as health and safety information to guide community member efforts to protect themselves from ongoing exposure as well as acute exposure during emergencies.</td>
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Updates on Inglewood Oil Field and Other Oil & Gas Related Issues

DPH Community Health Improvement Plan (CHIP)

Los Angeles County Department of Public Health & Community Prevention and Population Health Task Force

CHIP Stakeholder Meeting: Environmental Justice – Strategies for Protecting Public Health Near Oil & Gas Operations for the Next Community Health Improvement Plan

September 19, 2019

DRAFT IDEAS FOR STRATEGIES TO PROTECT PUBLIC HEALTH NEAR OIL AND GAS OPERATIONS FOR THE NEW COMMUNITY HEALTH IMPROVEMENT PLAN

Draft strategies are based on approved versions of the Los Angeles County and City Sustainability Plans. Strategy language has been updated based on feedback and recommendations gathered through key informant interviews with community-based and grassroots groups, and other stakeholders working on health and health equity efforts. Strategies have been vetted and prioritized by the Community Prevention and Population Health Task Force, a Los Angeles County Board-appointed advisory body tasked with promoting health, equity, and community well-being in Los Angeles County.

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Updates on Inglewood Oil Field and Other Oil & Gas Related Issues

Culver City Oil & Gas Programs

• Amortization Study
• Ongoing review of oil & gas regulations and administration
Amortization Study –
One of several informational components available to the City Council for decisions made related to the Inglewood Oil Field

- Existing Ordinance
- Existing Well History
- Draft Drilling Regulations
- Draft Specific Plan
- Draft Environmental Impact Report (EIR)
- + Amortization Study

Inform the City Council as future direction and regulation of the IOF come under consideration
Tentative Amortization Study Timeline

July 2019

0 - Data Gathering & Base Case Development
1
2

Oct. 2019

3 - Base Case Model & Validation
4
5

Jan. 2020

6 - Base Case Calibration & Sensitivity Analysis
7
8 - Report Preparation

- Presentation & Consideration of Report Findings
Other News, Announcements & Next Steps