March 16, 2015

The Honorable Meghan Sahli-Wells
Mayor
City of Culver City
9770 Culver Boulevard
Culver City, California 90232-0507

The Honorable Andrew Weissman
Councilmember
City of Culver City
9770 Culver Boulevard
Culver City, California 90232-0507

Re: Request for Bottom Hole Well Locations

Mayor Sahli-Wells and Councilmember Weissman:

We received your letter dated February 9, 2015 requesting that Freeport- McMoRan Oil & Gas ("FM O&G") provide the City Council Subcommittee on Oil Drilling with a map of the Inglewood Oil Field, identifying each bottom hole location within the Culver City jurisdiction, together with the top hole location and information about the depth and GPS coordinates for the bottom hole identified on the map. The letter stated that this information is needed to assist the City in understanding potential impacts of the pending Inglewood Oil Field Specific Plan. Included with your letter were minutes from the Community Advisory Panel meetings in which representatives from FM O&G indicated that FM O&G would not be providing the information. The letter provides no specific justification as to why the City believes this information is relevant.

As you are aware, the City’s jurisdiction applies to surface and land use considerations, not downhole operations which are the exclusive regulatory purview of the State of California Division of Oil, Gas, and Geothermal Resources (DOGGR). Given the lack of explanation how the information is relevant to development of an ordinance governing surface land use, we are not inclined to tie up the added resources necessary to prepare this material. However, we note that the information you seek can be obtained through an examination of DOGGR’s well files, if the City wants to allocate resources to prepare the map on its own. With this letter, we can affirm FM O&G’s position that none of the information requested is relevant to the City’s preparation of municipal oil production
regulations, and accordingly FM O&G will not be providing the requested map or other information until such a time as adequate justification for this information request is provided.

We also take this opportunity to express our frustration with a process that has been dragging on for a decade or more. As recently as March of 2014, City representatives promised to have a draft of a Specific Plan put forward for approval in 3rd Quarter 2014. However, another half-year has lapsed and no draft plan has been issued.

We have faithfully attempted to work cooperatively with the City to develop a set of comprehensive regulations that address legitimate issues as they might arise from oil related activities, in a manner similar to the regulations that were adopted more than six years ago by Los Angeles County in the form of the Community Standards District (CSD). FM O&G submitted more than 77 pages of comments in response to the City’s discussion draft that were intended to be helpful in moving the process forward. By focusing of unrelated issues such as downhole maps, the City appears to be creating distractions for itself that detract from the main task at hand, revising the draft Specific Plan.

Please consider this letter a formal request for updated timetable on the release of the specific plan and related environmental documentation. We continue to be steadfast in our belief that the EIR that was prepared for the CSD, which included the territory within Culver City, is adequate for the City to be able to adopt its own updated regulatory framework. We look forward to a status report from the Council Subcommittee on Oil Drilling.

Sincerely,

[Signature]

cc: The Honorable Members of the Culver City Council