

Communication from Public

Name: Pico Robertson Health and Safety Coalition

Date Submitted: 05/05/2022 09:53 AM

Council File No: 21-1025

Comments for Public Posting: Please see the attached cover note from the Pico Robertson Health and Safety Coalition and appended copy of the Zoning Administrator's March 24, 2022 letter to PCEC about the sub-surface pipeline leak and spill that surfaced on December 11, 2021. The ZA's Letter Contradicts the ZA's December 2, 2021 Submission to City Council, Contradicts the ZA's Categorical Exemption from Environmental Review, and Contradicts Many Critical Aspects of the ZA's Handling of the Entire Review Case.

Cover Note from Pico Robertson Coalition with appended documents, including the Zoning Administrator's March 24 letter to PCEC and its most important attachments.

The Zoning Administrator (ZA) Sent a Letter to PCEC on March 24, 2022 About the Pipeline Leak, Spill, Environmental Clean-Up, and Related Long-Running Violations at the West Pico Drill Site.

The ZA's Letter Contradicts the ZA's December 2, 2021 Submission to City Council, Contradicts the ZA's Categorical Exemption from Environmental Review, and Contradicts Many Critical Aspects of the ZA's Handling of the Entire Review Case.

On March 24, 2022 the Associate ZA presiding over the ZA review of the West Pico Drill Site sent a letter to PCEC about the subsurface pipeline leak and spill that emanated on the surface on December 11, 2021, its causes rooted in 20 years of non-compliance with pipeline safety regulations, and its environmental impact that necessitated CalGEM's order for a sub-surface clean-up and the opening of a Water Board case. The ZA's letter demanded a response from PCEC within 30 days.

A copy of the ZA's letter is posted on the Planning Department case information systems at this address (<https://planning.lacity.org/pdiscaseinfo/document/MTk4NDA0/1823a02c-5d95-4003-95c4-258347c32f18/pdd>), but it does not include the documents the ZA listed as attachments.

We are appending to this cover note a copy of the ZA's letter and the documents the ZA attached to his letter, except for:

1. The critically important CalGEM inspection report ("Field Memo") from December 13, 2021 which is posted separately on CF 21-1025 (submitted 5/04/2022) due to file size, and
2. The April 5, 2000 ZA determination in ZA-17683-PAD, which is too large a file to upload on the Council File system but is already part of the case file in ZA-1989-17683-PA2 and incorporated here by reference.

Here are some of the most important points to note about the ZA's March 24, 2022 letter:

The ZA's March 24 letter recognizes the spill as part of long-running and still unresolved violations with environmental impact at the West Pico Drill Site. That contradicts all of the ZA's arguments about the lack of significant violations and lack of environmental impact from the ZA's opposition to NASE's appeal that the ZA submitted to City Council on December 2, 2021, just nine days before the spill reached the surface.

The ZA's March 24 letter contradicts the ZA's earlier contention from his June 2, 2021 determination, his testimony at the WLA Area Planning Commission hearing, and his December 2, 2021 submission to City Council that only the Eastern half the West Pico Drill Site at 9101 W Pico was subject to review. The ZA's March 24 letter to PCEC the ZA declares that the entire West Pico Drill Site (both halves) is subject to the PA2 Review.

The ZA's March 24 letter now recognizes and asserts his authority to order "corrective measures" and new conditions of use, which is an authority he now quotes from Condition 77 of the ZA's 2000 approval for the West Pico Drill Site, which he heretofore denied. It is also an authority created by the Los Angeles Municipal Code, Section 13.01.E.2.i. This contradicts the ZA's incorrect denials that he had such authority, which he made repeatedly in public hearings, and also in his December 2, 2021 submission to City Council in which he argued that he had no authority to review illegal oil well projects.

The ZA's March 24 letter recognizes that at least three ZA conditions have been violated for years by the illegal actions that led to the subsurface pipeline leak and the spill that emanated on the surface. The ZA's letter (see attached report from LA County FD HHMD) recognizes that the causes of the spill were put in place 20 years earlier, circa 2001, and that violations have therefore been running throughout the entire time period. Had the ZA performed required duties in the PA2 review by collecting and examining up-to-date Spill Prevention Plans required by Conditions 36 and 78 of the 2000 ZA approval, and checked for "Conformance with Regulatory Oversight" as required by Condition 48 of the 2000 ZA approval, it is possible this spill could have been avoided.

Every page of the ZA's March 24 letter is labeled "Case No. ZA-17683-PA2" and the entire text of the letter indicates that the ZA is admitting the environmental impact of the spill and the violation of critical compliance, health, and safety conditions. These are things that the ZA heretofore denied without having performed environmental review required by the State's CEQA law, without collecting and examining records mandated by Condition 78 of the 2000 ZA approval, and without considering ordering "corrective measures" and new conditions authorized by Condition 77 and LAMC 13.01.E.2.i because the ZA wrongly denied he had those authorities.

In the face of all of these self-contradictions, the obviously correct thing for the ZA to do would be to recognize that the entire case needs to be sent back for proper Environmental Review under CEQA and to recommend that to City Council, which is now the decision maker in the case.

The State's CEQA law requires that Environmental Review must precede decision making and must be publicly noticed and reported so as to inform public participation. That means a full collection and analysis of data must be done for Environmental Review, which must be made

public before a new public hearing is held, and then the ZA must make a new decision on the case. But the ZA is, so far, not doing any of that and is instead multiplying self-contradiction and legal error in a dizzying way by continuing to charge ahead rather than correcting past errors.

We already know and have proven that there are many more major permitting and safety violations at the West Pico Drill Site that were presented to the ZA during his consideration of the PA2 review case, but the ZA refused to examine and/or contradicted himself about whether they occurred.

NASE has argued that major permitting and safety violations at an oil drill site carry with them obvious potential for significant environmental impact. That is precisely why the oil industry is regulated as it is by City, State, and Federal laws. But those regulations mean nothing if there is little or no meaningful inspection, review, and enforcement.

Sadly, the pipeline leak and surface spill have now demonstrated beyond a shadow of a doubt that major permitting and safety violations at the West Pico Drill Site entail potential and actual environmental impacts that are still unfolding.

The ZA violated CEQA by granting a Categorical Exemption from Environmental Review. City Council must overturn the Categorical Exemption and require proper Environmental Review.

Documents follow on succeeding pages.

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200 N. SPRING STREET, ROOM 763
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planning.lacity.org

March 24, 2022

Phillip Brown (Operator)
Pacific Coast Energy Company
1555 Orcutt Hill Road
Orcutt, CA 93455

CASE NO. ZA-1989-17683-PAD, ZA-1989-17683-PA2

LETTER OF COMMUNICATION

9101 West Pico Boulevard
West Los Angeles Community Plan

Zone: C4-1VL-O

C.D: 05 - Koretz

D.M.: 123B169

CEQA: EIR-98-0149 PA; ENV-2020-1328-CE

Legal Description: Fr Lots 1-3, 4 & 5; TR 3845

Dear Mr. Brown,

The Department of City Planning is requesting additional information regarding an incident that occurred on December 11, 2021 at the West Pico Drill Site (9101 and 9151 West Pico Boulevard). The facility operated by Pacific Coast Energy Company, composed of an extraction site and a production site, is subject to land use conditions of approval and environmental mitigation measures outlined in prior approvals, most recently Case No. BZA-2000-1697/ZA-17683-PAD.

Background

On April 5, 2000, the Zoning Administrator approved a modernization project for the West Pico Drill Site (Drill Site) and numerous improvements were made at the subject property as a result of that discretionary approval. The modernization project permitted the operator to install a new oil drilling rig, a new perimeter wall, and approval for a number of wells to be drilled. The determination also included specific design requirements, limitations on construction and operations, and other permitted activities. The Zoning Administrator imposed various restrictions and requirements for safety purposes - both for drill site personnel and the surrounding neighborhood. Below are a select number of conditions outlined in the April 5, 2000 determination and remain in effect today for the entire Drill Site:

Condition 36. Spill Prevention Plan. The applicant shall at all times maintain an oil spill prevention control and countermeasure plan in conformance with applicable law. A copy of the Spill Prevention Plan shall be given to the Zoning Administrator for placement in the file.

Condition 46. Avoidance of Nuisance. All production equipment shall be so constructed and operated that no noise, vibration, dust, odor, or other harmful or annoying substances or effect which can be eliminated or diminished by the use of greater care shall be permitted to result from production operations carried on at the site or from anything incident thereto to the injury or annoyance of persons living in the vicinity; nor shall the site or structures thereon be permitted to become dilapidated, unsightly or unsafe. Proven technological improvements in methods of production shall be adopted as they from time to time become available if capable of reducing factors of nuisance or annoyance.

Condition 48. Conformance with Regulatory Oversight. All operations at the site relating to drilling and production activities shall be carried out in accordance with the applicable rules of the California Division of Oil, Gas, and Geothermal Resources, including all rules and regulations related to the full protection of the public water supply.

Condition 77. Continuing Oversight. A Zoning Administrator may impose additional conditions or require corrective measures to be taken if they find, after actual observation or experience with drilling one or more of the wells in the district, that additional conditions are necessary to afford greater protection to the surrounding property.

Spill Incident Details

According to documents reviewed by the Office of Zoning Administration:

On Saturday, December 11, 2021, at 8:00 PM (PST) the facility's staff noticed an oil spill into the public alley that runs parallel to the extraction site (between Doheny and Oakhurst) of the overall Drill Site. PCEC commenced a clean-up process and the site's operations were suspended during the clean-up and safety inspection protocols. A third-party company, Patriot Environmental Services, Inc., was contacted by the operator and conducted the clean-up work. This process also included cleaning the alley using special equipment and this third-party company also secured all the hazardous material spilled for safe disposal.

The Drill Site's foreman, Patrick Vigeant, in a telephone conversation to Office of Zoning Administration staff shared that a pipeline may have been the possible source of the oil spill. This pipeline was out of service but remained physically connected to the rest of the pipeline system at the Drill Site. Mr. Vigeant also disclosed to Planning staff that the clean-up process continued into early Sunday morning and at 1:00 a.m. and the environmental services company left shortly after completing.

This timeline was also confirmed in a field memorandum completed by CalGEM staff on 12/13/2021. According to that correspondence, the remainder of Sunday, December 12, 2021, the operator's staff began isolating the pipeline that was leaking the hazardous material. That is, it was being disconnected from the rest of the pipeline system for the site to prevent future spills. The operator removed a metal lid, known as a slip blind, from the now completely disconnected pipeline and installed new industrial-level caps. At 1:00 p.m. that Sunday, the Drill Site resumed normal operations.

Beginning on Monday, December 13, 2021, several engineers, inspectors, and staff from different regulatory agencies visited the site for inspection and to identify the facts and details of the spill. A variety of units from the California Geologic Energy Management Division, the Los Angeles Fire Department, and the Los Angeles County Fire Department visited the site. All issued notices regarding the incident are attached to this Letter of Communication. A summary of the Office of Zoning Administration's conversations with the Drill Site operator and with the involved agencies can also be found as an attachment.

Land Use Violations

As a result of the December incident, the Office of Zoning Administration is concerned that PCEC may be in violation of the following Conditions of Approval detailed in Case No. ZA-17683-PAD: Condition 36, Condition 46, and Condition 48.

- Condition 36. Spill Prevention Plan. The current SPP on-file with the Office of Zoning Administration does not show the out-of-service pipeline that was the source of the spill.
- Condition 46. Avoidance of Nuisance. Odors from the materials spilled into the public right-of-way were smelled by residents and stakeholders. Also, CalGEM had determined in their 12/14/2021 Notice of Violation that the use of a special type of lid (a 'slip blind') that was used on the out-of-service pipeline fails to meet the definition as a proven technological improvement that prevents spills and incidents from occurring at the Drill Site. An incident report, dated 12/13/2021, from the Los Angeles County Fire Department's Health-Hazardous Materials Division team confirmed the nuisance odor.
- Condition 48. Conformance with Regulatory Oversight. CalGEM issued a Notice of Violation dated December 14, 2021, which highlights that some operating standards at the site were not in line with CalGEM standards at the Drill Site, including the use of a slip blind for the out-of-service pipeline. The Notice of Violation also identifies follow-up tasks for the operator that include submitting a root cause analysis to explain more about the source of the leak.

As a result of these pressing issues, the Office of Zoning Administration requests some updated materials and answers to outstanding questions regarding the matter.

Actions Required

This office is requesting additional information from the operator. These requests and questions are imperative so that the department, and the public, obtain accurate and transparent answers as to what transpired before, during and after the spill on December 11, 2021. The outstanding questions are outlined below:

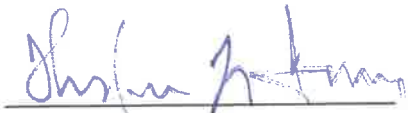
- Has an incident similar to the 12/11/2021 event happened before at the Drill Site?
- What is the approximate number of gallons spilled onto the alley way? What did the materials spilled onto the public alley consist of?
- Did the material also spill inside the perimeter of the Drill Site? If so, to what extent?
- How often are slip blinds inspected at the Drill Site by personnel/staff?
- Where else are slip blinds used on out of service pipelines at the Drill Site?

- Explain the emergency procedures and protocol that facility staff followed at the time of the spill incident.
- Describe which agencies, offices, and emergency response services were contacted by the operator following the discovery of the leak.
- Explain the extent that PCEC is cooperating with state, county, or City agencies to review the subsurface cleanup process in the aftermath of the spill.

In addition, the following requests are being made to ensure that the Office of Zoning Administration has the most accurate information regarding the Drill Site's operation. The Office of Zoning Administration requests this information pursuant to Condition No. 36 and Condition No. 48:

- The Office of Zoning Administration requests an updated map/schematic illustration of all underground and aboveground pipelines at the Drill Site, including out-of-service pipelines.
- The Office of Zoning Administration requests an updated Spill Prevention Plan that includes details on notification to emergency response services and regulatory agencies, including but not limited to: CalGEM, South Coast AQMD, LAFD, LACoFD HHMD, the Petroleum Administrator, and the Zoning Administrator.
- Submit an exact copy of the Root Cause Analysis requested by CalGEM in the 12/14/2021 Notice of Violation.
- Explain if PCEC will work with the California Water Boards agency to assess any potential contamination below the ground surface resulting from the 12/11/2021 spill. If there are no plans for this effort, please explain why PCEC thinks a subsurface assessment and clean-up is not necessary.

The Department requests a response within 30 calendar days. If you have any questions regarding this matter, please contact the Office of Zoning Administration. The response to the letter of communication should be directed to Edber Macedo at (213) 978-1198 or at edber.macedo@lacity.org.



THEODORE L. IRVING, AICP
Associate Zoning Administrator

TLI:VS:ecm

Cc: Councilmember Koretz, Fifth Council District
Chief Anthony Hardaway, Los Angeles Fire Department
Inspector Alvin Dong, Los Angeles Fire Department
Erica Blyther, Office of Petroleum and Natural Gas Administration and Safety
Catherine Nuezca Gaba, Code Enforcement Bureau, Department of Building and Safety
Jennifer Tobkin, Office of the City Attorney

Attachments: [ZA-17683-PAD](#), dated 4/5/2000
[CalGEM](#) Field Memo, dated 12/13/2021
[CalGEM](#) Notice of Violation, dated 12/14/2021

[LAFD](#) Notice of Violation, dated 12/15/2021

[LACoFD HHMD](#) Incident Report, dated 12/13/2021

Department of City Planning [summary](#), dated 01/14/2022



NOTICE OF VIOLATION

December 14, 2021

Violation I.D. 12242781

VIA EMAIL

Mr. Philip Brown, Agent
Pacific Coast Energy Company LP (B6127)
1555 Orcutt Hill Road
Orcutt, CA 93455
philip.brown@pceclp.com

Dear Mr. Brown:

SPILL/INCIDENT, PACIFIC COAST ENERGY COMPANY LEASE, BEVERLY HILLS FIELD

On December 11, 2021, California Geologic Energy Management Division (CalGEM) received notification from the Office of Emergency Services (Cal OES #21-7076) regarding a spill from a Pacific Coast Energy Company LP pipeline in the Beverly Hills field. This letter itemizes violation(s) of the California Code of Regulations, title 14 (CCR).

Maintenance of Production Facilities and Equipment: CCR section 1777 (a) states, "Operators shall maintain production facilities in good condition and in a manner to prevent leakage or corrosion and to safeguard life, health, property, and natural resources."

Out-of-Service Production Facility Requirements: CCR section 1773.5 (a) states in part that within "six months after the determination that a production facility is Out-of-Service, the following shall be required:

(1) Out-of-Service production facilities shall have fluids, sludge, hydrocarbons, and solids removed and shall be disconnected from any pipelines and other in-service equipment.

(6) Pipelines associated with Out-of-Service tanks and pressure vessels shall be removed or flushed, filled with an inert fluid, and blinded."

Well Site and Lease Restoration: CCR section 1776 (f) states that "Lease restoration shall include the removal of all tanks, above-ground pipelines, debris, and other facilities and equipment. Remaining buried pipelines shall be purged of oil and filled with an inert fluid. Toxic or hazardous materials shall be removed and disposed of in accordance with Department of Toxic Substances Control requirements".

Mr. Philip Brown, Agent
Pacific Coast Energy Company LP (B6127)
Violation I.D. 12242781
December 14, 2021

The subject violation is summarized in the table below:

| Pipeline Description | Violation Description | Violation Number |
|-----------------------------------|-----------------------|------------------|
| WellSTAR Pipeline ID# 90324914 | Pipeline leak | 12242781 |

Spilled fluid and all impacted media, including surface and subsurface, must be cleaned-up. The pipeline must be abandoned to the standards specified in CCR section 1776(f). Additionally, a root cause analysis and action taken to prevent future occurrence must also be provided to CalGEM by January 11, 2022.

Pacific Coast Energy Company LP shall notify CalGEM during normal working hours (8:00 am to 5:00 pm) once the violations have been corrected for a re-inspection.

Failure to comply with the laws of California and CalGEM may result in enforcement action including, but not limited to, issuance of a civil penalty and/or order pursuant to Public Resources Code Sections 3106, 3224, 3235, 3236, and 3236.5.

If you have any questions, please contact Neda Tafi at (562) 637-4400 or neda.tafi@conservation.ca.gov.

Sincerely,

Grace P. Brandt Digitally signed by Grace P. Brandt
Date: 2021.12.14 13:04:12 -08'00'

Grace Brandt
Environmental and Facilities Unit Supervisor

cc: Los Angeles City Fire Department- lafdcupa@lacity.org
Pipeline and Facilities Program File

Main Page

| | | | | |
|------------------------------------------------------------|--|----------------------------------------|----------------------------------|------------------------------------|
| AGENCY NAME LACoFD -- HHMD | | AGENCY ID NO. 19740 | AGENCY INCIDENT NO. SR0040422 | AGENCY PHONE NO. (323) 890-4317 |
| INCIDENT ADDRESS/LOCATION 9101 W. Pico Bl., Los Angeles | | INCIDENT DATE (NOTIFIED) 12/13/2021 | TIME NOTIFIED 11:35AM | TIME COMPLETED 6:00PM |
| CITY/COMMUNITY LOS ANGELES 90035 | | DATE OCCURRED 12/11/2021 | TIME ON SCENE 12:47PM | DATE ON SCENE 12/13/2021 |
| APN: Thomas Guide Grid: | | | | |

| | | | |
|------------------------------------------------|------------------------|--------------|-----------|
| Reported By REQUESTOR AC Fernando Florez | AGENCY / BUSINESS NAME | PHONE NUMBER | EXTENSION |
|------------------------------------------------|------------------------|--------------|-----------|

| | | | |
|--------------------|--------|-------------------------|--------------------|
| INCIDENT COMMANDER | AGENCY | OTHER AGENCIES ON SCENE | AGENCIES CONTACTED |
|--------------------|--------|-------------------------|--------------------|

| | | |
|----------------------------------------------|--------------------------------------|-------------------------------|
| LEAD REPORTING OFFICER Carlo Van Rensburg | TEAM ASSISTANT NAME Winston Perez | OTHER HHMD PERSONNEL ON SCENE |
|----------------------------------------------|--------------------------------------|-------------------------------|

| | | | | | |
|------------------------|---------------------|---------------------|--------------------------|--------------------|--------------------------|
| INCIDENT TYPE Spill | SEVERITY HAZ-MAT | COST RECOVERY No | RECEIVED BY EE0000177 | DATE 12/13/2021 | ASSIGNED TO EE0000178 |
|------------------------|---------------------|---------------------|--------------------------|--------------------|--------------------------|

Nature of Service
Oil leak from a well

Comments

HH311 (Van Rensburg) and HH312 (Perez) responded to a crude oil release that initially occurred on 12-11-21. The release was reported to CAL-OES on 12-11-21 (Cal-OES 21-7076) as a release of approximately 5 gallons of crude oil, with no storm drains impacted. The release was cleaned by a hazardous waste contractor, Patriot Environmental Services on 12-11-21. Affected areas were pressure washed and water was collected by a vacuum truck the same day that the release occurred.

According to Patrick Vigeant, Production Foreman, the release occurred from an abandoned pipeline that has been abandoned for more than 20 years. Blind flanges on the line failed over a long period of time causing the release. The release originated at 9151 W. Pico Blvd. and traveled underground along the alley and S. Oakhurst Drive, where it surfaced in the alley located behind 9101 W. Pico Blvd. Patrick Vigeant stated that the release was a mixture of produced water and crude oil with an approximately 3-4% crude oil content.

Air monitoring was conducted on scene by HH311 and HH312. VOC's were detected by the HH312 MultiRae and reached approximately 41PPM inside an anode box operated by the water company. No detectable VOC's were observed in the breathing zone, or in areas that had residual staining. A nuisance odor was observed and it was agreed with Patrick Vigeant, that additional mitigation and clean up would be required. The readings for LEL and H2S were observed to be 0 on the MultiRae's used for air monitoring.

Patriot Environmental Services were contracted to additional clean up of affected areas. Simple Green was spread on affected areas and brushed with stiff bristle brooms. Areas were then pressure washed and waste water was collected by a vacuum truck. Waste water was transported on non-hazardous manifest #0239202. Approximately 100 gallons non-hazardous waste, water with trace hydrocarbons, were transported to Patriot Environmental Services in Anaheim, CA.

Hazmat Release

| | | | | |
|-------------------------------------|-----------------------------------------------------|--------------------------------|---------|-----------------------------------|
| PROPERTY USE Residential | SURROUNDING AREA Residential | PROPERTY MANAGEMENT PRIVATE | WEATHER | ESTIMATED TEMPERATURE (Deg. F) |
| TYPE OF EQUIPMENT INVOLVED OTHER | MOBILE PROPERTY TYPE NO MOBILE PROPERTY INVOLVED | | | |

| | | | | | |
|-------------------|---------------------|-------|----------------------|--------------------|--------------|
| VEHICLE MAKE/YEAR | VEHICLE LICENSE NO. | STATE | VEHICLE ID NO. (VIN) | CA/DOT/PUC/ICC NO. | COMPANY NAME |
|-------------------|---------------------|-------|----------------------|--------------------|--------------|

| | | | |
|-----------------------------------------------------|-------------------------------------|--------------------------------------------------------|------------------------------|
| RP BUSINESS NAME Pacific Coast Energy Company LP | RP AUTH REP NAME Patrick Vigeant | RP ADDRESS 9151 W Pico Blvd., Los Angeles, CA 90035 | RP PHONE NO. 310-261-7826 |
|-----------------------------------------------------|-------------------------------------|--------------------------------------------------------|------------------------------|

Release Factors

| | | |
|--------------------------------|----------------------------------------------------|------------------------|
| 11 - INTENTIONAL ACT | 50 - MECHANICAL FAILURE | 80 - NATURAL CONDITION |
| 12 - SUSPICIOUS ACT | 60 - DESIGN, CONSTRUCTION, INSTALLATION DEFICIENCY | 94 - FIRE/EXPLOSION |
| 30 - FAILURE TO CONTROL HAZMAT | 70 - OPERATIONAL DEFICIENCY | 98 - NO RELEASE |
| 31 - ABANDONED | 99 - OTHER | |
| 40 - MISUSE OF HAZMAT | 00 - UNDETERMINED | |

HEALTH HAZARDOUS MATERIAL INCIDENT REPORT

Action Taken

- 31 - RESCUE. REMOVE FROM HARM

32 - EXTRICATION

33 - EMERGENCY MEDICAL SERVICE

35 - SEARCH

36 - TRANSPORT

41 - REMOVE HAZARD (NEUTRALIZE)

42 - ID/ANALYSIS OF HAZMAT

43 - EVACUATION

44 - ESTABLISH SAFE AREA
- 45 - MONITOR

46 - DECON-PERSON/EQUIP

47 - DECON-AREA (CLEANUP)

48 - CONTAIN/CONTROL HAZMAT

61 - CROWD CONTROL

62 - TRAFFIC CONTROL

63 - NOTIFY OTHER AGENCY

64 - PROVIDE PUBLIC INFO

71 - INVESTIGATE
- 73 - SHUT DOWN SYSTEM

82 - SECURE PROPERTY

92 - REFER TO PROPER AUTHORITY

98 - NO ACTION TAKEN

97 - HAZMAT RESPONSE. MATERIAL DETERMINED TO BE NONHAZARDOUS

99 - OTHER

Clean Up & Casualty

CLEAN UP

CLEAN UP COST

CLEAN UP PAID BY

CLEAN UP COMPANY NAME

SITE ENTRY LEVEL

BUSINESS

Patriot Environmental Services

DATE ON SCENE

DATE LEFT SCENE

PROGRAM REFERRAL

CASUALTY

NUMBER OF DECON

NUMBER OF INJURIES

NUMBER OF FATALITIES

TRANSPOTATION DESTINATION

RESPONSE AGENCY PERSONNEL

OTHERS

0

0

0

0

NAMES OF INJURED

HazMat Identification - Personnel

- 19 - ON-SITE FIRE SERVICES

29 - OFF-SITE FIRE SERVICES

40 - ON-SITE NON-FIRE SERVICES
- 60 - OFF-SITE NON-FIRE SERVICES

54 - CHEMIST

58 - TOX CENTER
- 59 - CHEMTREC

99 - OTHER

HazMat Identification - Reference Material

- 21 - DOT MANUAL

23 - MSDS

24 - PLACARDS/SIGNS
- 25 - PRIVATE INFO SOURCE

26 - COMPUTER SOFTWARE

27 - SHIPPING PAPERS
- 98 - NO REFERENCE MATERIALS USED

99 - OTHER

More Than 2 Substances Involved?

Chemical

XC0031888

CHEMICAL OR TRADE NAME

DOT ID NO.

DOT HAZARD CLASS

CAS NO.

Produced water containing 3-4% crude oil

PHYSICAL STATE

QUANTITY RELEASED

ENVIRONMENTAL CONTAMINATION

EXTENT OF RELEASE

STORED

RELEASED

5.00 gal

GROUND

Released Beyond Property Use of Origin

LIQUID

LIQUID

CONTAINER DESCRIPTION

CONTAINER TYPE

LEVEL OF CONTAINER

CONTAINER MATERIAL

CONTAINER CAPACITY

CHEMICAL OR TRADE NAME

DOT ID NO.

DOT HAZARD CLASS

CAS NO.

PHYSICAL STATE

QUANTITY RELEASED

ENVIRONMENTAL CONTAMINATION

EXTENT OF RELEASE

STORED

RELEASED

CONTAINER DESCRIPTION



CONTAINER TYPE

LEVEL OF CONTAINER

CONTAINER MATERIAL

CONTAINER CAPACITY

Attachments

| | | | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|-----------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|
|  | Los Angeles Fire Department - Official Inspection Report COMPLAINT FOLLOW-UP 200 N. Main Street Los Angeles, CA 90012 (213) 978-3680 www.lafd.org | | | | |  |
| INSPECTOR NAME: ALVIN DONG | PHONE: 2132383515 | DISTRICT: | FIRE STATION: | APN: | NOTICE#: DA98ZFSVF | INSPECTION DATE: 12/15/2021 |
| | | | PAT VIGEANT Pacific Coast Energy Company LP (West Pico) 9151 W PICO BLVD LOS ANGELES, CA 90035 (310) 271-7560 | | CERS ID: 10248883 FACILITY ID: FA0023350 RECORD ID: COAAXXQRI | |
| NVO = No Violation OUT = Out of Compliance UD = Undetermined NA = Not Applicable COS = Corrected Onsite RPT= Repeat Violation | | | | | | |
| Actual or threatened release reported to the unified program agency and Cal OES <input type="checkbox"/> NVO <input checked="" type="checkbox"/> OUT <input type="checkbox"/> UD <input type="checkbox"/> NA <input type="checkbox"/> COS <input type="checkbox"/> RPT | | | | | | CLASS II COMPLY BY: 1/14/2022 |
| Violation Description: Failure to report a release or threatened release of a hazardous material to the unified program agency and Cal OES. 19 CCR 4 2631; HSC 6.95 25510(a) | | | | | | |
| Violation Comments: Please report your release from Saturday evening to the LAFD CUPA, https://docs.google.com/forms/d/e/1FAIpQLSdlFk4XINWr-c-se1u2MMOHhI3sdCCyQVMJFcigYmAXFF9sPw/viewform Submission made during the inspection. Abate violation. | | | | | | |
| Overall Inspection Comments | | | | | | |
| Met Pat Vigeant, Production Foreman, who gave consent to inspect and take pictures. Mr. Vigeant detailed the cause of the release and the events to mitigate the effects of the release of crude oil from the evening of Saturday, 12.11.2021. Underground piping had been blinded years ago. The blind developed a pinhole leak and crude oil was detected oozing from the wall adjacent the alley across the street in at 9101 W Pico, approximately 10-15 feet from Oakhurst. Operations were halted to stop the release and determine the source. Notification was made to CalOES that evening. A contractor, Patriot Environmental, was called out to clean up the spill. Approximately 15 gallons of material were estimated to have been recovered. Per Mr. Vigeant, the material stayed in the alley did not reach the street between Oakhurst and Doheny. No evidence of staining was observed on either Oakhurst nor Doheny. The contractor cleaned up the spill by Sunday, 12.12.2021, and the underground piping was purged and cleaned. Additional cleaning was performed Monday evening 12.13.2021 at the request of HHMD. The underground piping has been disconnected from the existing active piping. The abandoned piping will be filled with slurry. Notification of the spill has been submitted to the CUPA this date and the violation has been abated. copy to: Rick Clark <rick.clark@pceclp.com> Pat Vigeant <pvigeant@pcedp.com> | | | | | | |



Los Angeles Fire Department - Official Inspection Report
COMPLAINT FOLLOW-UP
200 N. Main Street
Los Angeles, CA 90012
(213) 978-3680
www.lafd.org



BUSINESS NAME:

FACILITY ID:
N/A

NOTICE#:
DA98ZFSVF

INSPECTION DATE:
12/15/2021

This report shall serve as a "NOTICE TO COMPLY" for Minor Violations, and a "NOTICE OF VIOLATION" for Major violations. Formal enforcement and/or penalty assessment may be initiated for any violations noted, and for those not corrected in a timely manner. You are, hereby, ordered by the Fire Chief to correct the above noted violations **WITHIN 30 DAYS, OR FORTHWITH IF INDICATED IN THE CORRECTION SUMMARIES PROVIDED.**

All businesses within the City of Los Angeles that store or handle hazardous materials above reportable quantities are required to submit a Hazardous Materials Business Plan (HMBP) annually to CERS cers.calepa.ca.gov. Any business that submits after the March 1st deadline may be subject to a late submittal fee of \$500.00, pursuant to the Los Angeles Municipal Code (L.A.M.C.), and/or enforcement action, pursuant to California Health and Safety Code (H&SC), Section 25508(a)(3).

Violators can be liable for civil penalties up to \$5,000 per day, for each violation. HSC 25299, HSC 25515, HSC 25270.12

Customer Feedback Survey

Please take a moment to participate in our Los Angeles Fire Department CUPA customer feedback survey by utilizing the link below:
<https://www.surveymonkey.com/r/CUPAFEEDBACK>

LAFD CUPA information

For further information or questions please visit the following link:
<https://www.lafd.org/fire-prevention/cupa>

Signatures

Pat Vigeant

Production Foreman



Edber Macedo <edber.macedo@lacity.org>

West Pico Drill Site spill on December 11, 2021

1 message

Edber Macedo <edber.macedo@lacity.org>
To: Edber Macedo <edber.macedo@lacity.org>

Fri, Jan 14, 2022 at 10:54 AM

This email serves as a summary of the 12/11/2021 West Pico Drill Site spill and the information gathered from city, county, and state sources.

On 12/13/2021, Daniel Skolnick from the Council District 5 office emailed me to share that there had been a spill incident at the West Pico Drill Site, specifically at the drilling portion of the operation (9101 West Pico Boulevard). He shared that LAFD has also been alerted. The spill had occurred on the evening of 12/11/2021. The email chain that Daniel forwarded to me included commentary from a South Robertson Neighborhood Councilmember who had observed the aftermath of the spill. The neighborhood councilmember included photographic evidence of what appeared to be absorbent snakes being used to clean up liquid material in the alley abutting the drilling portion of the West Pico Drill Site. On 12/13/2021, I informed the Chief Zoning Administrator of what had occurred on the site and informed them that I would be investigating the land use and environmental implications of such an emergency event.

I replied to Daniel, and Cc'd Andy Schrader & Joan Pelico, on 12/13/2021 to inform him that the Office of Zoning Administration would be inquiring with regulatory agency staff and with the drill site foreman to gain a full background of what transpired at the site.

On 12/14/2021, I had a phone conversation with the drill site's foreman, Patrick Vigeant, and he provided some background to the incident. In short, there is an underground water line that is used to supply water to the wells (it's used water, mixed with oil) and the line was no longer in use, but was still connected. The line, however, was pressurized and that caused it to start leaking underground and then it began to seep from the pavement surface. Drill site staff noticed this at 8pm on Saturday 12/11. They shut down the facility when they noticed the spill. Approximately 10 gallons spilled in the alleyway. A 3rd party contractor arrived by 9pm to clean up and they opened up the alleyway by 1am, Sunday 12/12. They have since isolated that water line that leaked to prevent another incident. Pat did submit an incident claim with CalOES, the state's emergency response agency. The CalOES claim automatically notified CalGEM and engineer Joseph Athanasious was directed to inspect the site on 12/13/2021.

On 12/13/2021, I contacted the CalGEM engineer, Joseph Athanasious, who had visited the West Pico Drill Site on 12/13/2021 and who had spoken with Pat Vigeant about what had occurred. On 12/22/2021, I spoke with Joseph Athanasious and Grace Brandt from CalGEM in a conference call to discuss the spill incident. Joseph explained that CalGEM had completed a memo about the incident and released it on 12/14/2021. The memo provides a narrative that includes background to the incident, field inspection notes, timeline, and photographic evidence of existing site conditions including the pipeline material that failed which then caused the leak. I submitted a PRA to CalGEM for the Drill Site's most recent Pipeline Management on January 4, 2022, but have not received the documentation.

On 12/14/2021, CalGEM issued a Notice of Violation to the operator. The violation was for a pipeline leak (Violation No. 12242781). CalGEM directed the operator to submit a root cause analysis to prevent future

incidents from occurring at the site; the operator must submit that analysis by 1/11/2022. The NOV also states that the operator must abandon and remove all hazardous equipment or materials to the satisfaction of DTSC. The CalGEM staff following up on the NOV is Grace Brandt, Environmental & Facilities Unit Supervisor at CalGEM's Southern District office. The memo and Notice of Violation from CalGEM have been added to the physical case file of ZA-17683. I will follow up with CalGEM staff in late January 2022 to identify if the root cause analysis was to the satisfaction of Ms. Brandt and whether the NOV has been resolved.

I was able to speak with Alvin Dong on January 4, 2022 from the Los Angeles Fire Department's CUPA program. The inspector shared that he visited the site and shared his observations. The inspector shared that he understood up to 15 gallons had spilled onto the alley way from the Drill Site. The report identifies that the Drill Site failed to notify the LAFD CUPA team and that in of itself was a violation. The violation was resolved as a result of the inspector visiting the site and receiving information from Drill Site personnel. The inspector shared that there would not be any follow-up actions from the CUPA team.

I also contacted the L.A. County Fire Department's Health and Hazardous Materials Division (HHMD), specifically their CUPA team. The CUPA contact, Kim Clark, a supervisor whose HHMD assignment encompasses 9101 West Pico, referred me to file a PRA for the Emergency Response report. HHMD staff visited the West Pico Drill Site on Monday, December 13, 2021 to evaluate the spill and inquire about the incident. They spoke with the drill site foreman, Pat Vigeant and took observations of the site. Their report is attached to this email and provides key details regarding the inspector's observations and the physical details of the spill. The report identifies that 5 gallons had spilled into the alleyway. This is a different amount than what Pat Vigeant communicated to me and what I had heard from Joseph Athanasious.

I spoke with HHMD's Emergency Response supervisor, Fernando Florez, on 1/13/2022 in a phone conversation and he elaborated more about the site visit to the Drill Site. He and his team visited the site on the following Monday after the spill, 12/13/2021. He observed that the spill was largely all cleaned up, but did still observe residual odors and asphalt staining in the public alleyway. As a result, Mr. Florez requested that the operator order the environmental clean up firm to revisit the Drill Site for additional cleaning. Mr. Florez's visit on 12/13/2021 was limited to the outside perimeter. He and his team completed a follow-up visit a week later and identified that the odor mitigation & asphalt stain cleanup met their satisfaction. At this follow-up visit, Mr. Florez's team did a walk through of the interior of the drill site and reviewed if the spill had come from tank equipment. He concluded that it was indeed from a pipeline. He shared with me that the case has been closed out and there are no subsequent Notices or Orders to arise out of this issue.

The OZA is reviewing the Conditions of Approval outlined in ZA-17683-PA2 (April 20, 2000 determination) and cross-referencing the details of the Notice of Violation with the land use conditions and environmental mitigation measures. My office is also cross-referencing the field observation and witness account from the neighborhood council member to identify any potential land use violations or non-compliance with environmental operating conditions. As of this email, my office is drafting a Letter of Communication to the operator with specific inquiries about the spill and facility protocols.

This email serves as a summary of the OZA's initial inquiries into the spill and is not a conclusion to the outstanding questions about the event at the Drill Site.

Attachments:

1. Summary Report - California Governor's Office of Emergency Services
2. Memorandum - California Geologic Energy Management Division
3. Notice of Violation - California Geologic Energy Management Division

- 4. Official Inspection Report - LA City Fire Department CUPA
- 5. Emergency Response Report - LA County Fire Department HHMD



Edberto Macedo (he/him)
City Planning Associate
Los Angeles City Planning

200 N. Spring St., Room 763
Los Angeles, CA 90012

T: (213) 978-1198 | Planning4LA.org



5 attachments

- LAFD CUPA_pacificCoastEnergySpill1.pdf**
195K
- HHMD ERR 9101 Pico.pdf**
90K
- Cal GEM 2021-12-14 _NOV_Beverly Hills _PCEC _Spill 2021-12-11 (2).pdf**
107K
- CalOES Report_9101Pico.pdf**
967K
- CalGEM report 2021-12-13_West Pico Drill site release field memo.pdf**
6895K