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August 16, 2018

Honorable Gilbert Cedillo, Los Angeles City Councilmember Honorable Curren Price, Los Angeles City Councilmember Honorable Nury Martinez, Chair Honorable Paul Koretz, Vice Chair Honorable Paul Krekorian, Member Honorable Mitch O'Farrell, Member Energy, Climate Change, and Environmental Justice Committee

FROM:

Uduak-Joe Ntuk, Petroleum Administrator

Office of Petroleum and Natural Gas Administration & Safety

SUBJECT:

COUNCIL FILE NO 17-1322 – TERMINATING INACTIVE OIL

DRILLING DISTRICTS IN COUNCIL DISTRICT 1

On November 21, 2017, Council Motion #17-1322 (Cedillo-Price) Drilling District / Active / Inactive Oil Code Process / Municipal Code Section 13.01, was introduced and subsequently, on December 5, 2017, the Energy, Climate Change and Environmental Justice Committee recommended to the City Council a committee report on the motion. On December 13, 2017 the City Council adopted the committee report instructing the Petroleum Administrator, in partnership with the Planning Department and the City Attorney's Office, to perform the following actions:

- 1. Identify the urban oil drilling districts and their associated ordinances within Council District 1;
- 2. Evaluate the urban oil drilling districts and their associated ordinances within Council District 1, consistent with the Los Angeles Municipal Code Section 13.01 criteria; and
- 3. Prepare a report on the steps necessary to terminate the identified inactive oil drilling districts.

The Office of Petroleum and Natural Gas Administration & Safety (OPNGAS) conducted an extensive review and evaluation of urban oil drilling districts within the Los Angeles City Council District 1. This report identifies extensive details of oil districts, oil wells, well status, existing and past operators, maps, and associated ordinances within the council district.

As a direct result of collaborating with various City departments and outside agencies, five (5) recommendations are hereby included for Council consideration that provide ways to terminate inactive urban oil drilling districts in Council District 1.

OFFICE OF THE BOARD OF PUBLIC WORKS

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RECOMMENDATIONS

It is recommended that the Los Angeles City Council, subject to the Mayor's approval:

- 1. Instruct the Planning Department's Zoning Administration Division and Board of Public Works to prepare and submit reports and determinations to start the termination process, in accordance with the Los Angeles Municipal Code Chapter 1, Article 3, Section 13.01 (J), for the following districts: U-16, U-123, U-128, U-129, U-130, U-136, U-137, U-137A, & U-153;
- 2. Request the Office of the City Attorney to prepare and present ordinances terminating the following inactive urban oil drilling districts; U-16, U-123, U-128, U-129, U-130, U-136, U-137, U-137A, & U-153. These Urban Oil Drilling Districts are inactive, have no current operations, no known oil wells, have no planned future oil and gas development, and meet the city's criteria for termination in accordance with the Los Angeles Municipal Code Chapter 1, Article 3, Section 13.01 (J);
- 3. Request the Office of the City Attorney to prepare and present an ordinance repealing Urban Oil Drilling District U-140 in accordance with the Los Angeles City Charter, Section 558;
- 4. Request the Office of the City Attorney to prepare and present an ordinance amending Los Angeles Municipal Code 13.01 (J) to include a new section on the termination of an urban oil district with buried wells;
- 5. Instruct the Office of the City Administrative Officer to identify funding in the amount of \$100,000 for the Office of Petroleum and Natural Gas Administration & Safety to work in conjunction with the Bureau of Engineering to conduct a geological subsidence review of the U-140 Inactive Urban Oil Drilling District.

DISCUSSION

Background - The Los Angeles Municipal Code (LAMC) Chapter 1, Article 3, Section 13.01 establishes oil districts land use code in the City of Los Angeles. The oil districts are areas in the City of Los Angeles where the drilling of wells for the production of oil, gases or other hydrocarbon substances are permitted. The oil districts are categorized into three (3) types within the Los Angeles City Oil Field area; Non-urbanized area, Offshore area, and Urbanized area.

A Los Angeles City Oil Field Area is described as, "all land in the City within the areas identified on the maps in Ordinance No. 156,166 located in Council File No. 80-3951 and shall include all oil producing zones beneath those areas but no deeper than the third zone beneath the surface of the earth." First, "Non-urbanized Areas" are all those portions of the City which the City Planning Commission or Council has determined will not be detrimentally affected by the drilling, maintenance, or operation of oil wells. In making its determination, the City Planning Commission, or the Council on appeal, shall give due consideration to the amount of land subdivided, the physical improvements, the density of population and the zoning of the district.

Second, "Offshore Areas" shall mean all property in the City of Los Angeles which is between the mean high tide line and the outermost seaward City boundary, such as the Harbor District or Venice Beach. Third and last, "Urbanized Areas" are all land in the City, except land in the M3 Zone, and land which has been determined to be Non-urbanized Area by the City Planning Commission or Council or land located in the "Los Angeles City Oil Field Area".

An oil well is any well or hole already drilled, being drilled or to be drilled into the surface of the earth which is used or intended to be used in connection with coring, or the drilling for prospecting for or producing petroleum, natural gas or other hydrocarbon substances, or is used or intended to be used for the subsurface injection into the earth of oil field waste, gases, water or liquid substances, including any such existing hole, well or casing which has not been abandoned in accordance with the requirements of Article 7 of Chapter 5 of the LAMC.

The City of Los Angeles classifies oil wells as either an Oil Well Class A or Class B. An Oil Well Class A is any oil well drilled, conditioned arranged, used or intended to be used for the production of petroleum. An Oil Well Class B is any oil well drilled, conditioned, arranged, used or intended to be used only for the subsurface injection into the earth of oil field waste, gases, water, or liquid substances.

The Los Angeles City's Petroleum Administration role has been codified in the LAMC since 1958. The LAMC provides the City's Petroleum Administrator with several responsibilities, such as:

- Examine and render a report and recommendation concerning matters related directly or indirectly to the exploration for or production of petroleum within the City of Los Angeles;
- Report, upon request, to any department, bureau or officer of this City concerning creation of oil well drilling districts under the provisions of the Los Angeles Municipal Code;
- Coordinate all matters respecting or concerning the exploration for or production of petroleum within this City;
- Investigate and make recommendations concerning existing restrictions on exploration for and production of petroleum in the City;
- Investigate subsidence problems and explore possible protective measures; and
- Perform any other duty or duties respecting petroleum which may be requested by the Council.

The Petroleum Administrator and staff from the Office of Petroleum and Natural Gas Administration & Safety (OPNGAS) held extensive meetings with various departments across the city. Large volumes of data was manually collected from the City's Piper Tech Archives, Planning Department, the State of California, and the Federal Government. OPNGAS collaborated with multiple outside agencies, including the California Division of Oil, Gas, and Geothermal Resources (CA DOGGR), South Coast Air Quality Management District (SCAQMD), and the US Environmental Protection Agency (US EPA). The creation of this report included reviewing the City's planning files, various geotechnical assessments, an investigation of historical petroleum codes, GIS mapping, legal analysis, and inter-agency coordination. A report of this nature has never been conducted by city staff before.

I. City of Los Angeles - Oil District Count

In the City of Los Angeles, the City Council and Planning Commission have established three hundred thirty (330) oil districts. The table below lists the number of oil districts by council district number:

Council District	Number of Onshore Oil Districts
1	13
	2
2	
3	1
4	8
5	58
6	6
7	10
8	18
9	22
10	35
11	30
12	40
13	7
14	14
15	66
Total	330

II. Termination of Oil Districts – Municipal Code

The Los Angeles Municipal Code Chapter 1, Article 3, Section 13.01 (J) provides the provisions to terminate oil districts. Listed below are the provisions by which an oil district can be terminated:

1. Any ordinance establishing the districts shall become null and void one year after the effective date thereof unless oil drilling operations are commenced and diligently prosecuted within such

one-year period; provided, however, a Zoning Administrator, upon recommendation of the Board of Public Works or its designee, may extend the termination date for four consecutive additional periods not to exceed one year each, prior to the termination date of each period, if written request is filed therefor with the office of the Zoning Administration setting forth the reasons for said request and a Zoning Administrator determines that good and reasonable cause exists therefor.

- 2. Any ordinance establishing an urbanized oil district shall become null and void one year after all wells drilled in the district after the effective date of said ordinance have been abandoned in accordance with legal requirements, unless a Zoning Administrator determines that the district is part of a group undergoing development from one or more common, controlled drilling sites, or on the basis of sufficient proof determines that production is allocated thereto from an adjacent, adjoining or nearby drilling district or districts under a unit or pooling agreement. In such cases a Zoning Administrator may if he finds that good and reasonable cause exists therefor, extend the termination date of the expiring district to coincide with the termination date of the other district or districts in which the one or more common controlled drilling sites are located or from which production is allocated under a unit or pooling agreement. A Zoning Administrator may terminate any such district when the reasons for such extension no longer apply.
- 3. Any ordinance establishing a non-urbanized district or district in the Los Angeles City Oil Field Area shall become null and void one year after all wells in the district have been abandoned in accordance with legal requirements, unless the Zoning Administrator, on the basis of sufficient proof, determines that the district is part of a group in which secondary hydrocarbon recovery operations are taking place, and that production from an adjoining or adjacent district is allocated thereto under a unit or pooling agreement. In such cases, a Zoning Administrator may, if he finds that good and reasonable cause exists therefor, extend the termination date to coincide with the termination date of the adjoining or adjacent district in which secondary recovery operations are being conducted. A Zoning Administrator may terminate any such district when the reasons for said extension no longer apply.

The termination of an urban oil district where an operator has been granted vested rights may implicate a takings under clauses of the state and federal constitutions. The value of such rights are undetermined and district termination may potentially lead to some form of litigation.

III. City Charter Section 558 – Ordinance Repeal

The Los Angeles City Charter (LACC) provides a process for the repeal of ordinances associated with the creation of urban oil districts adopted by past City Council action. LACC Section 558 states the requirements and procedures for the repeal of ordinances that create or change any zones or districts for the purpose of regulating the use of land. The steps to initiate the repeal of urban oil districts according to the LACC is the following:

- 1. The urban oil district repeal must be initiated by the City Council;
- 2. Next the City Planning Commission has an opportunity to report and make a recommendation on the repeal request;

- 3. Prior to adopting the repeal, the City Council is required to make a finding based on the recommendation of the Planning Commission;
- 4. The urban oil district repeal must be adopted by the City Council;

The Planning Commission's recommendation or failure to act does not stop the council from repealing the ordinance associated with the urban oil districts.

IV. Summary of Council District 1

Los Angeles City Council District 1 (CD1) is one of the 15 districts of the Los Angeles City Council, representing sections of Northeast Los Angeles and Northwest Los Angeles. The district includes the neighborhoods of Glassell Park, Cypress Park, Highland Park, Mt. Washington, Sycamore Grove, Solano Canyon, Elysian Park, Echo Park, Westlake, Angelino Heights, Temple Beaudry, Chinatown, Forgotten Edge, Lincoln Heights, Montecito Heights, Pico Union, Adams-Normandie, University Park, Victory Heights, Koreatown, Mid Cities, and Mac Arthur Park. The 1st District is separated from Downtown by the 110 freeway, and the boundary continues northeast until it reaches York Boulevard in Highland Park.

As of the 2010 Census, there were 355,942 people residing in the district. The population density was 16,456.67/mi². The racial and ethnic makeup of the district was 66.7% Latino, 9.4% white, 3.8% African American, 0.2% Native American, 19.2% Asian, and 0.7% from other races.

The California Communities Environmental Health Screening Tool Version 3.0 (CalEnviroScreen) was developed by the Office of Environmental Health Hazard Assessment (OEHHA), on behalf of the California Environmental Protection Agency (CalEPA). CalEnviroScreen is a science-based assessment tool that helps identify California communities that are most affected by many sources of pollution, and that are often especially vulnerable to pollution's effects. The CalEnviroScreen scores for Council District 1 census tracts range from 50%-100% which include the middle range to the highest levels of pollution exposure.

V. Council District 1 - Oil Wells Status

The California Division of Oil, Gas, and Geothermal Resources (CA DOGGR) defines the current status of oil and gas wells as Active, Buried, Idle, New, Plugged and Unknown. They are each defined as the following:

- Active Wells are oil and gas wells that have been drilled and completed;
- Buried Wells are historically abandoned wells that pre-date current records and may not be abandoned to current standards;
- Idle wells are active wells that are not producing, but are capable of being reactivated;
- New wells are recently permitted wells and may be in the drilling state of development;
- Plugged wells have been plugged with cement and abandoned to current standards; and
- Unknown wells have little to no information and are from the pre-1976 era of wells drilled within the City.

According to the CA DOGGR database as of March 2018, there are 705 oil wells in Council District 1. The table lists the status of oil wells in Council District 1.

Status	Well Count	Percentage
Active	0	0%
New	0	0%
Idle	24	3%
Plugged	267	38%
Buried	414	59%
Total Wells	705	100%

The Department of Planning database also indicates that 108 of the oil wells are located in four (4) urban oil districts and 597 oil wells are not in an oil district. Out of the 108 oil wells within an urban oil district; there are 52 buried oil wells, 35 plugged oil wells and 21 idle oil wells. Oil wells may be outside of oil drilling districts if they were drilled prior to the municipal oil code establishment in the 1940s or the wells are under the Los Angeles City Field provisions. The oil wells in the Council District 1 are located in either the Las Cienegas or Los Angeles City oil fields.

VI. Urban Oil Drilling Districts in Council District 1

The Los Angeles City Council and the Department of Planning established thirteen (13) urban oil districts in Council District 1. Each Oil District was established by municipal ordinance. The table below lists the urban oil districts and the adoption of each corresponding ordinance:

DISTRICT	ORDINANCE	Approval Date
OD-22	ORD-103525	July 1, 1954
U-13	ORD-111135	March 28, 1958
U-16	ORD-112141	October 3, 1958
U-123	ORD-129726	March 30, 1965
U-128	ORD-130255	June 8, 1965
U-129	ORD-130253	June 8, 1965
U-130	ORD-130254	June 8, 1965
U-136	ORD-131453	December 17, 1965
U-137	ORD-131454	December 17, 1965
U-140	ORD-131457	December 17, 1965
U-153	ORD-134009	February 17, 1967
U-137A	ORD-137763	November 27, 1968
LAC-2	ORD-158816	March 26, 1984

Appendices 1, 2, and 3 of this report show the current and historical maps of each urban oil district location within Council District 1. Many of the maps were recovered from the City's archives.

Urban Oil Drilling District OD-22

There are 7 buried oil wells and 8 plugged oil wells in OD-22. The table below lists the oil operators and the number of oil wells per operator.

Operator	Well Count	Well Status
A.D. Reese	2	Buried
British Calif. Oil Co	1	Buried
C.C. Harris Oil Co	5	1 Buried, 4 Plugged
Chevron USA	2	Plugged
Consolidated Crude Oil Co.	2	Buried
Dagger & Fletcher	1	Buried
Ventura Oil Co	2	Plugged
Total OD-22 Wells	15	

There are no current operators or active wells in this district. However, the buried wells present in the district have not been abandoned to in accordance with legal requirements of CA DOGGR. This urbanized oil drilling district does not meet the termination requirement as stated in LAMC 13.01 (J).

Urban Oil Drilling District U-13

There are 43 buried oil wells and 19 plugged oil wells in U-13. The table below lists the oil operators and the number of oil wells per operator.

Operator	Well Count	Well Status
Andrew Lin	2	Plugged
Combined Oil & Land Co	2	Buried
Continental Oil Company	1	Buried
Courtland City Lights Assoc	6	1 Buried, 5 Plugged
Doheny & Common	1	Buried
E. G. Burke	1	Plugged
I. W. Shirley	1	Plugged
J. Korber	1	Buried
John Charters	1	Buried
Keating Est	1	Plugged
Little Napoleon Oil Co	2	Buried
M. Manley	4	Plugged
Manley Energy Resources LLC	3	Plugged
Manley Oil Co.	4	Buried
Midland Oil Co.	4	Buried
Mrs. J Anderson	2	Buried
Pacific Union Oil Co.	1	Buried
Park Crude Oil Co.	9	Buried
Parker Morrell Oil Co.	5	Buried
Parker Oil Col	3	2 Buried, 1 Plugged
Union Consolidated Crude Oil Co.	4	3 Buried, 1 Plugged
W. Dryden	2	Buried
Whittier Grande Oil Co.	2	Buried
Total U-13 Wells	62	

There are no current operators or active wells in this district. However, the buried wells present in the district have not been abandoned to in accordance with legal requirements of CA DOGGR. This urbanized oil drilling district does not meet the termination requirement as stated in LAMC 13.01 (J).

Urban Oil Drilling District U-140

There are twenty-one (21) idle wells in U-140. The table below lists the oil operator and the number of oil wells per operator.

Operator	Well Count	Well Status
AllenCo Energy	21	Idle
Total U-140 Wells	21	

The historical St. James Drill Site in U-140 was originally operated by the Atlantic Richfield Oil Company (ARCO) and Standard Oil of California. Six (6) oil wells were first approved in 1965. The site was further developed to add more wells and a below ground oil well cellar. The drill site located at 814 W. 23rd Street Los Angeles, CA 90007 is now operated by the AllenCo Energy Company and has twenty-one (21) idle wells. The CalEnviroScreen Score for this site ranges from 90%-100%, which is the highest level of pollution burden on a vulnerable population. The site has been inactive for more than four (4) years due to multiple government regulatory orders restricting its operation and requiring the site to be shut down. No oil and gas production is currently approved to be produced by AllenCo at this time. It should be noted that the oil wells at the AllenCo Drill Site extend out horizontally under seven (7) urban oil districts. They include U-105, U-130, U-135, U-136, U-137A, U-139, and U-140. Urban Oil Districts U-105, U-135, and U-139 are located in City Council District 9 (CD9).

- On January 15, 2014, the U.S. Environmental Protection Agency cited AllenCo for two (2) violations of the Clean Air and Clean Water Acts. Specifically, the EPA determined they failed to maintain a safe facility by not taking the necessary steps to prevent accidental releases of extremely hazardous substances as required by the General Duty Clause, including the failure to inspect pressure vessels and pressure relief devices, steel piping, and steel tanks. AllenCo was also found to have failed to follow the original equipment manufacturers' specifications and recommendations for the testing, calibration and repair of its methane and fire eye flame detectors. Additionally, AllenCo failed to develop and implement a timely and complete Spill Prevention, Control, and Countermeasure (SPCC) Plan that addresses all applicable SPCC requirements and failed to conduct proper inspections of piping and maintain required inspection schedules and records for field drainage systems. These violations resulted in a \$99,000 fine.
- On April 16, 2014, the U.S. Environmental Protection Agency issued a Consent Order for AllenCo for failure to follow industry standards, violations of the Clean Air and Clean Water Acts, and presenting an imminent and substantial threat to public health or welfare of the United States.
- On April 28, 2014, the California Department of Oil, Gas and Geothermal Resources issued Order No. 1047 to AllenCo for eighteen (18) required actions. The conditions of this order have not been met.

- On May 6, 2015, the South Coast Air Quality Management District (SCAQMD) issued a modified permit to operate (Permit No. G35562) to AllenCo with seventeen (17) conditions required in order to restart operations. The conditions of this permit are subject to approval from SCAQMD.
- In September 2015, the South Coast Air Quality Management District (SCAQMD) agreed to a legal settlement with AllenCo related to four (4) air pollution violations, which included creating odors that caused a public nuisance and failure to properly control emissions from a wastewater tank and other equipment causing the release of smog forming volatile organic compounds (VOCs) into the air. AllenCo agreed to pay \$144,250 in civil penalties.
- On June 3, 2016, the People of California v. AllenCo Energy reached a final judgement of \$1.25 million in civil penalties to the City of Los Angeles and new terms required to operate, including the installation of continuous fenceline air monitoring and community notifications.

The U-140 Urban Oil Drilling District that has the AllenCo/St. James Drill Site located within the oil district does not meet the requirements to have the district terminated under LAMC 13.01(J) due to the idle wells not being properly abandoned yet. However, the City Council can repeal this urban oil drilling district under the City Charter Section 558. The property is owned by the Catholic Archdiocese of Los Angeles, which has the authority and current ability to terminate the oil and gas operating lease agreement with AllenCo. There are several provisions in the 1964 oil and gas lease agreement that allow for the Archbishop to terminate the lease, such as in Section 19 that states, "The obligations of the Lessee hereunder shall be suspended while the Lessee is prevented or hindered from complying therewith... orders of any federal, state, county, municipal, or other government agency... in no event shall such obligation be suspended under this subparagraph beyond a period of one (1) year from the time which such drilling operations should otherwise have commenced." The site has not been allowed to restart by multiple local, state, and federal government agencies for more than four years. The Archdiocese has not received any royalty payments while the site has been prevented from operating by the government agencies.

The United States Conference of Catholic Bishops (USCCB) is an assembly of the hierarchy of the United States and the U.S. Virgin Islands who jointly exercise certain pastoral functions on behalf of the Christian faithful of the United States. The USCCB's Socially Responsible Investment Guidelines & Policies calls for the protection of human life, promotion of human dignity, pursuit of economic justice, and the protection of the environment. The Archdiocese of Los Angeles' financial investment at the AllenCo Drill site appears to be in conflict with this policy and the USCCB's stated strategy of "do no harm" in investments that may cause scandal. The USCCB advises a refusal to invest in companies whose products and/or policies are counter to the values of Catholic moral teaching or statements adopted by the Conference of bishops.

In 2015, His Holiness Pope Francis issued a papal encyclical called "Praised Be" which called on the world's 1.2 billion Catholics to join the fight against climate change. The encyclical declared the church's global policy that the science of climate change is clear and that the Catholic Church views climate change as a moral issue that must be addressed in order to protect the Earth and everyone on it. The Allenco Drill site is a source of greenhouse gas (GHGs) air emissions which contribute to climate change.

Since 2017, the Los Angeles Archdiocese has been working with the City's Petroleum Administrator to explore alternative uses for the AlleCo Drill Site. The Archdiocese has expressed a strong desire to align

Pope Francis' encyclical on climate change and the United States Conference of Catholic Bishops' social responsible investment policy to protect the health and well-being of the entire community surrounding the location. Several re-use options for the property have been identified that will provide the Archdiocese with a new revenue stream that is not related to oil and gas production. The City Council should move to repeal U-140 in accordance with Los Angeles City Charter Section 558.

Subsidence is commonly known as the sinking or gradual lowering of the earth's surface. It is found worldwide in a variety of environments on land and the seafloor. Subsidence can result from either natural geologic and/or man-made causes. Natural geologic causes are fault movement, sediment compaction, and relaxation of deep earth stresses. Man-made causes include groundwater pumping, mining, oil & gas production, and/or surface loading. A subsided area can vary in size from a few acres to thousands of square miles. Elevation losses can be from a fraction of an inch to tens of feet in depth. Damages can range from minor land elevation losses to costly private property damage and environmental contamination of freshwater aquifers.

Subsidence due to oil and gas extraction is a very common phenomenon in the Los Angeles geological basin, particularly related to oil & gas production and produced water injection wells. There are extensive subsidence monitoring and controls established at the Inglewood and Wilmington Oil Fields. However, there are no known records of any modern geological subsidence review at the U-140 Urban Oil Drilling District. The heavy oil & gas production, followed by the long absence of water injection at the AllenCo Drill Site, has likely led to localized sinking and/or sedimentology compaction of the land around the drill site. This compaction may be evidenced by the recent elevated well pressures in some of the wells at the site, even though no production activity has occurred for more than four years. The effect of ground loading could be pushing associated gas out of the open subsurface reservoir zones and into the well bores. This situation is of concern and needs to be addressed while the facility is inactive. Unstable land surfaces from oil and gas production can jeopardize the adjacent St. Mary's college campus, LAUSD School, adjacent residences, and the City's public right of way. The Petroleum Administrator and Bureau of Engineering should conduct an extensive evaluation, with a recognized expert, to confirm how much subsidence may be occurring. If its determined that subsidence has occurred in the urbanized oil district or surrounding area due to oil recovery, then corrective actions and protective measures must be implemented for public safety purposes.

Urban Oil Drilling District LAC-2

There are 2 buried oil wells and 8 plugged oil wells in LAC-2. The table below lists the oil operators and the number of oil wells per operator.

Operator	Well Count	Well Status
Stadium Way Partners LP	6	1 Buried, 5 Plugged
Chavez Realty Development Co	2	Plugged
R. Earl	1	Plugged
British Calif. Oil Co	1	Buried
Total LAC-2 Wells	10	

There are no current operators or active wells in this district. However, the buried wells present in the district have not been abandoned to in accordance with legal requirements of CA DOGGR. This urbanized oil drilling district does not meet the termination requirement as stated in LAMC 13.01 (J).

Urban Oil Drilling Districts U-16, U-123, U-128, U-129, U-130, U-136, U-137, U-137A, U-153

The Department of Planning records show that there are no records of oil wells vertically drilled in the above oil drilling districts. There are no current operators or active wells in this district. Cross referencing CA DOGGR database also shows no known oil wells in each of these geographic areas. Therefore, based on our analysis, a total of nine (9) urban oil districts are being recommended for termination in accordance with the Los Angeles Municipal Code Chapter 1, Article 3, Section 13.01 (J).

There are oil wells outside of the urban drilling districts in Council District 1. There are three (3) idle wells in the Echo Park Neighborhood in the Los Angeles City Field. They are the "Patel 2" oil well operated by Vida Resources LLC, "McKeon 3" oil well operated by Mary E. Connelly, and the "Well 5" operated by the Manley Oil Company.

Urban Oil Drilling Districts OD-22, U-13, LAC-2

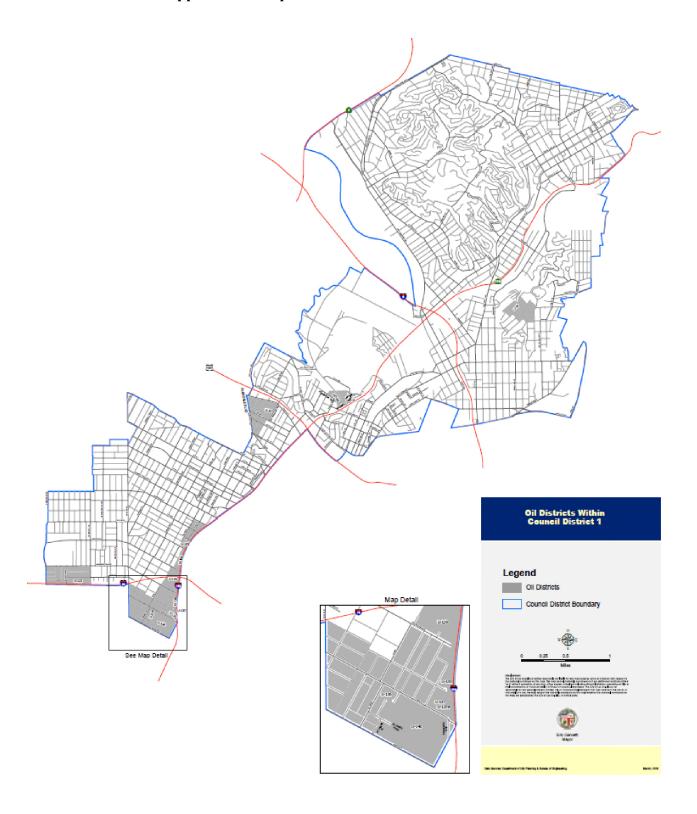
These three urban oil drilling districts do not meet the termination requirement as stated in LAMC 13.01 (J) due to their buried wells not abandoned to current CA DOGGR legal requirements. The wells are no accessible from the surface and cannot be re-abandoned. There should be an ordinance change to allow for oil districts with buried wells to be terminated the same way as the other districts.

If you have any questions, please call me at (213) 978-1697 or via email at Uduak. Ntuk@lacity.org.

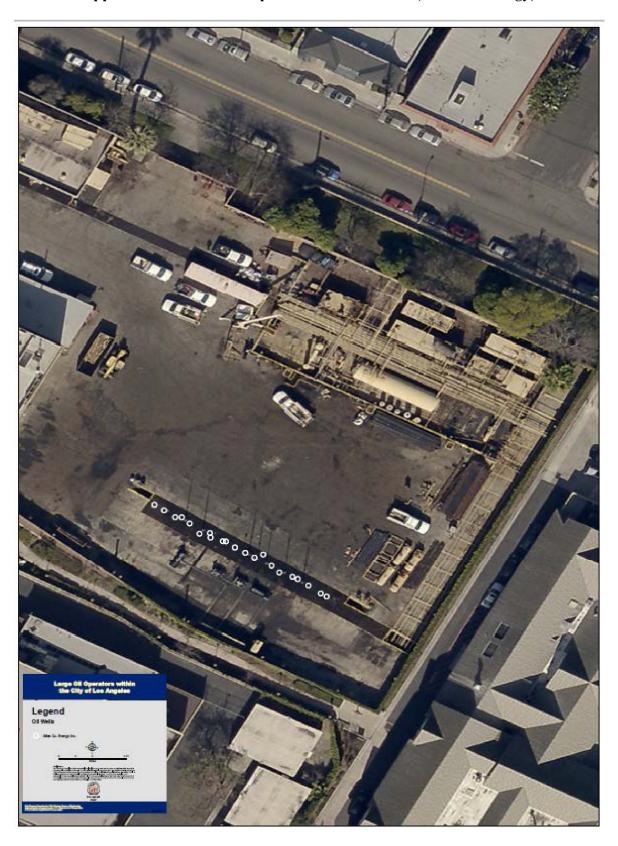
Courtesy Copy:

Kevin James, President, Board of Public Works Dr. Fernando Campos, Executive Officer, Board of Public Works Jennifer Tobkin, Office of the City Attorney Tanea Ysaguirre, Office of the City Attorney Lisa Webber, Planning Department Yeghig Keshishian, Planning Department

Appendix 1 –Map of Council District 1 Urban Oil Districts

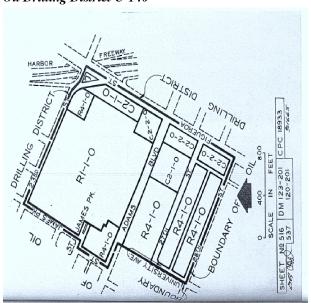


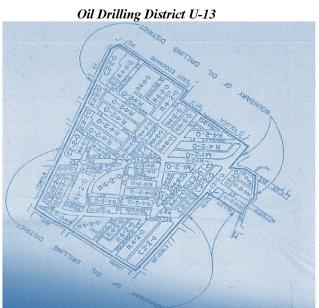
Appendix 2 – Current Map of U-140 Oil District (AllenCo Energy)



Appendix 3 – Historical Maps of CD1 Oil Districts

Oil Drilling District U-140





Oil Drilling District AC 2

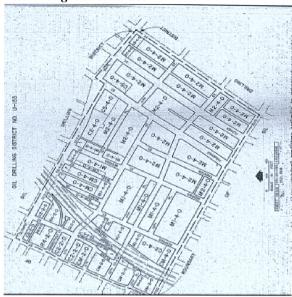
OIL DRILLING DISTRICT

NO.22

Oil Drilling District LAC 2

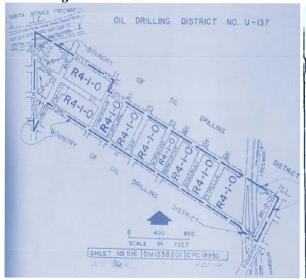
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Oil Drilling District U-153

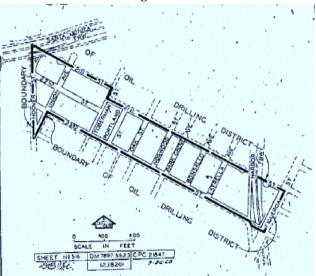


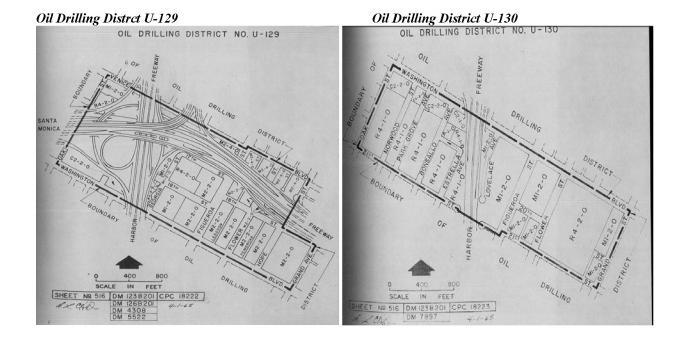
OIL DRILLING DISTRICT NO. U-16 BOUNDARY OF OIL DRILLING DISTRICT MEADOW ULEN FR. 1.198 RITTORY RITTORY RITTORY RITTORY SCALE FEET SHEET NO 498 DW 1418 2278 CPC 8860

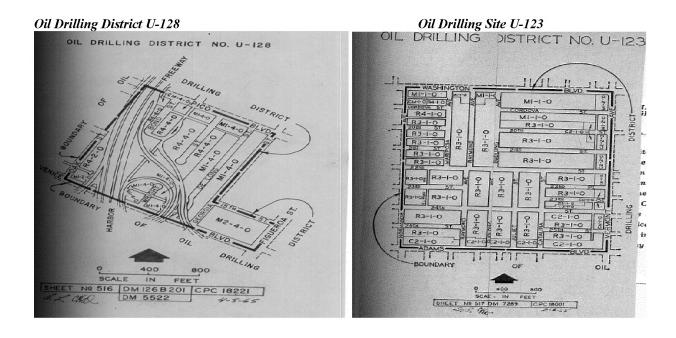
Oil Drilling District U-137



Oil Drilling District U-137A







Oil Drilling Site U-136

