



South Coast Air Quality Management District

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FAXED: JANUARY 5, 2006

January 5, 2007

Ms. Linda Campion
Department of Conservation
Division of Oil, Gas and geothermal Resources
801 K Street, MS 20-20
Sacramento, CA 95814

Dear Ms. Campion:

**Initial Study/Negative Declaration for The Inglewood Oil Field
PXP Well Drilling Program
In Los Angeles County for 2007**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated in the final Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Negative Declaration. The SCAQMD would be available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

SS: CB

LAC061212-05
Control Number

**Initial Study/Negative Declaration (IS/ND) for The Inglewood Oil Field
PXP Well Drilling Program
In Los Angeles County for 2007**

Project Emissions: The lead agency states on page 10 of the Negative Declaration that the proposed project would generate “short-term emission impacts” from the following emissions sources: particulate matter (dust) during drill pad construction and from daily ingress and egress of vehicles on the unpaved access road, exhaust emissions from transport of workers and machinery to and from the site, and exhaust emissions from the operation of equipment on-site (on-site equipment are listed on pages 27 and 28 of the IS/ND). The lead agency then states on page 11 that “the project is determined to have less than significant impacts to Air Quality.” The IS/ND does not provide any data or quantitative analysis to demonstrate that the proposed project emissions would not be significant.

Please note that without providing a quantitative analysis of potential emissions from the drilling of the wells and soil movements to fill the well pads using the calculation methodologies in the 1993 SCAQMD CEQA Air Quality Handbook (Handbook) or other approved methodologies, the lead agency has not demonstrated that the project’s construction air quality impacts will not be significant.

Localized Impacts (Significance Thresholds) Analysis: Consistent with the SCAQMD’s environmental justice program and policies, the SCAQMD recommends that the lead agency also evaluate localized air quality impacts to nearby sensitive receptors. SCAQMD staff recommends that for this project and for future projects, the lead agency undertake the localized analysis to ensure that all feasible measures are implemented to protect the health of nearby sensitive receptors. The methodology for conducting the localized significance thresholds analysis can be found on the SCAQMD website at: www.aqmd.gov/ceqa/handbook/LST/LST.html.

Note that localized Impacts analysis should be done for both construction and operation and there are two corresponding look-up tables for that as well.

PM2.5 Significance Thresholds: In response to adoption of PM2.5 ambient air quality standards by U.S. EPA and CARB, SCAQMD staff has developed a methodology for calculating PM2.5 emissions when preparing air quality analyses for California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents. To determine if PM2.5 air quality impacts are significant, SCAQMD staff has also developed recommended regional and localized significance thresholds. When preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a PM2.5 significance analysis by following the guidance found at http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html Further, SCAQMD staff has compiled mitigation measures to be implemented if the PM2.5 impacts are

determined to be significant. Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

Complaints and Mitigation: It is stated on page 11 of the Negative Declaration that the oil field has been in operation since 1924 and with 1,600 wells completed during that time and that odors from these operations have been extremely rare. The IS/ND reports only one short-term release of unexpected non-hazardous fumes from the Nodular Shale. Please note that SCAQMD records over the last three years indicate otherwise.

SCAQMD records show that on January 11, 2006, five complaints were received by SCAQMD as a result of hydrogen sulfide release from the oil field. On inspection it was discovered that the gas release came from drilling rig at well # 1-935. Tests conducted by SCAQMD on sample taken on La Cienega north of Stocker showed THC to be four times ambient concentration and total sulfur to be 13 ppbv. This is documented in SCAQMD notification # 122010. Since then, two notices of violation have been issued by SCAQMD. The first notice of violation was issued on February 7, 2006, for noxious natural gas odors, methane gas odors and foul crude oil and strong petro odors. The second notice of violation was issued on April 6, 2006, for gas odors.

Given that two oil wells are within 100 meters of sensitive receptors, SCAQMD staff strongly recommends continuous monitoring of gases on the site to detect and quickly cap those releases to reduce the public nuisance.

Applicable SCAQMD Rules: The lead agency should be aware that the proposed project is subject to the following SCAQMD rules: Regulation XX – Regional Clean Air Incentives Market (RECLAIM), 401 – Visible Emissions, 402 – Nuisance, 431.1 – Sulfur Content of Gaseous Fuels, 461 – Gasoline Transfer and Dispensing, 463 – Storage of Organic Liquids, 1110.2 – Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines, 1122 – Solvent Degreasers, 1148.1 – Oil and Gas Production Wells, 1149 – Storage Tank Degassing, 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants, and 1176 – Sumps and Wastewater Separators.