

CITY OF LOS ANGELES DEPARTMENT OF CITY PLANNING OFFICE OF ZONING  
ADMINISTRATION  
**STAFF INVESTIGATOR REPORT**

July 23, 2026

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Murphy Oil Drill Site  
2126 West Adams Boulevard and 2125 West  
26th Place  
Los Angeles, CA 90018

CASE NO. ZA-2026-3203-RV  
POSSIBLE IMPOSITION OF CONDITIONS TO  
ABATE NUISANCE OR REVOCATION OF USE  
2126 West Adams Boulevard and 2125 West  
26th Place  
South Los Angeles Community Plan  
Zone: [Q]R4-1-O-HPOZ  
C.D: 10 - Hutt  
D.M.: 123B193  
CEQA: ENV-2026-3204-CE  
Legal Description: Lot A, PM 1641

**Request**

The purpose of the hearing is to obtain testimony of the property owner and/or business operator, plus affected and/or interested persons regarding the operation of the "Murphy Oil Drill Site" (Drill Site), location addresses 2126 West Adams Boulevard and 2125 West 26th Place. Following the hearing, the Associate Zoning Administrator may require the discontinuance of the use; or modify, delete, or impose additional conditions regarding its use as a drill site in order to mitigate any land use impacts caused by the use. The public is also invited to submit written comments prior to the hearing.

The Associate Zoning Administrator will consider the following.

- a. Whether an exemption from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines, Section 15321/Class 21 applies, and whether there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies.

- b. Pursuant to Chapter 1A, Section 13B.6.2. of the Los Angeles Municipal Code, Nuisance Abatement/Revocation proceedings for the Murphy Oil Drill Site by the Associate Zoning Administrator for:
- a. Possible violations of City Conditions of Approval in Case No. ZA-1959-15227-O-PA6-1A:
    - i. Condition No. 3 (LAMC Section 13.01 F compliance, p. 12);
    - ii. Condition No. 4 (site improvements, p. 20);
    - iii. Condition No. 6 (hours of operations, p. 22);
    - iv. Condition No. 7 (sound reduction, p. 23);
    - v. Condition No. 10 (nuisance/annoyance impacts from oil drilling activity, p. 28);
    - vi. Condition No. 13 (graffiti abatement, p. 33);
    - vii. Condition No. 18 (annual reporting, p. 35);
    - viii. Condition No. 19 (fenceline air monitoring system, p. 37);
    - ix. Condition No. 21 (landing page, p. 40);
    - x. Condition No. 23 (finalization of the required structure around the oil production area, p. 43);
    - xi. Condition No. 24 (Spill Prevention Control and Countermeasure Plan, p. 47);
    - xii. Condition No. 25 (equipment and energy usage, p.48);
    - xiii. Condition 26 (equipment and energy usage, p. 50), and;
    - xiv. Condition No. 27 (idle well regulations, p. 51).
  - b. Regional Violations, Notices, and Documentation
    - i. South Coast Air Quality Management District (SCAQMD)
      - 1. Notice of Violation: P80684 for equipment operation within 1,000 ft. from a K-12 school boundary site (p. 31);
      - 2. Notice of Violation: P78161 for vapor leak in excess of established thresholds (p. 29);
      - 3. Notice to Comply: E61263 for the use of spray as a neutralizing agent (p. 29);
      - 4. Notice to Comply: P74382 for failure to properly maintain equipment (p. 29);
      - 5. Notice to Comply: P73334 for failure to collect and control the emissions of produced gas (p. 29);
      - 6. Between January 1, 2024 and June 1, 2026, SCAQMD records indicate that there were 27 odor complaints regarding the subject business, p. 30).
  - c. State Violations, Notices, and Documentation
    - i. California State Geologic Energy Management Division (CalGEM)
      - 1. Notice of Compliance I.D. 12281399 for failure to conduct a fluid level test (p. 31);
      - 2. Notice of Compliance I.D 12364552 for unsuccessful well testing (p. 31);
    - ii. California Air Resources Board (CARB)
      - 1. Methane Task Force Inspection Report for the South Los Angeles Community Reported a leak on Oil well No. 5 (p. 29).

**Authority**

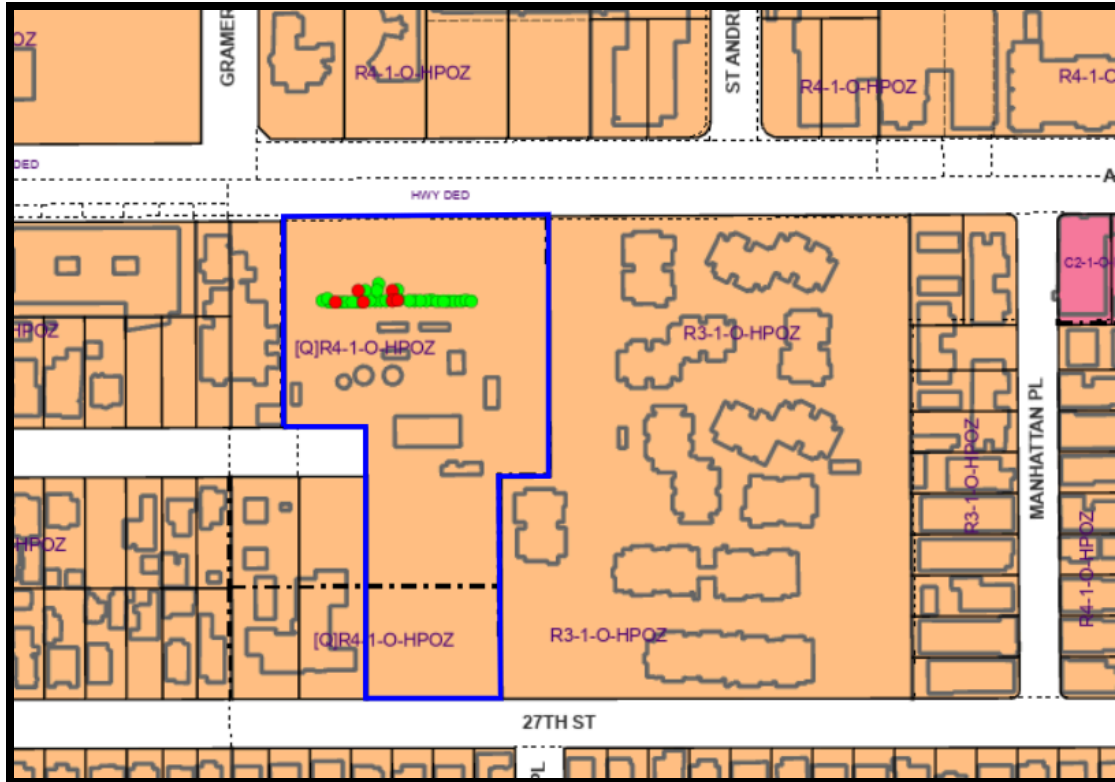
The Zoning Administrator has the authority to modify or discontinue the use, or to impose corrective conditions on the operation of the existing business as a drill site under Chapter 1A, Section 13B.6.2. of the Los Angeles Municipal Code (LAMC).

**Property Description**

The site is a slightly sloping, irregular-shaped parcel of land consisting of approximately 3.2 acres, having a frontage of approximately 323 feet along West Adams Boulevard, 160 feet along West 26th Place, and 165 feet along West 27th Street. The site is in the [Q]R4-1-O-HPOZ zone and Urbanized Oil Drilling District No. U-37 was established by Ordinance No. 114,701 in 1959. The site contains wells bottoming in Urbanized Oil Drilling Districts Nos. 36-40, 81-84. The northern portion of the drill site is enclosed with a concrete block wall which is set back from Adams Boulevard approximately 25 feet. Along 27th Street, the property is a 3.2 acre site enclosed by a 6-foot-high tubular iron fence along the east, west, and south property lines, and an 8-foot concrete block fence setback approximately 25 feet from the property line. The oil drilling operation is separated on a 44,900 square-foot (1.03 acre) northern portion of the lot. The southern landscaped portion of the lot is separated with a concrete wall from the oil drilling site. The eastern portion of the lot is also separated from the oil producing site. A block wall, varying in height from 21 feet to 29 feet due to topographical variations, is located approximately 265 feet from 27th Street.

The oil drilling portion of the site is developed with tanks, well cellars, pumps, generators, compressors, operational buildings, and a parking area on the easterly side of the property. The southern portion of the site does not include production equipment, and is landscaped and irrigated. The site overall contains mature trees throughout, a rock garden, sod and other landscaping, including shrubs along the property boundaries to the east and west. The oil drilling portion of the site is accessed via a pair of gates and driveways on Adams Boulevard and the southern landscaped portion is accessed via a gate and driveway on 27th Street.

**Image 1:** ZIMAS Generalized Zoning Map, 2020.



**Image 2:** Google Map Aerial view, 2026.



The Drill Site is improved with an oil well cellar, connections to underground pipelines, storage tanks, oil separators, office building, compressors, scrubbers, and additional oil extraction equipment. According to SCAQMD records, there are three (3) individual natural-gas powered microturbine units. These microturbine units are registered with SCAQMD with the individual Permit Nos. as follows: G65435, G65434, and G65433.

The diagram illustrates the layout of the Oils & Grease Recovery Facility (OGRF). Key components include:

- Entrances:** MAIN ENTRY EXIT at the top left and ENTRY EXIT at the top right.
- Parking Area:** Located between the main entry and the facility entrance.
- OIL WELL CELLAR:** Two long horizontal structures containing numerous STARS (e.g., 23-27, 30-37).
- Central Processing Area:** Contains large circular tanks (T1, T2, T3), a BAKER TANK, and various pumps (P10-A, P10-B).
- Storage Areas:** ROD/TUBE STORAGE at the top, OL DRUM STORAGE AREA on the left, and WASTE DRUMS on the right.
- Utility Rooms:** TURBINE ROOM, ELEC. SWITCH ROOM, and ELEC. TRANS. at the bottom right.
- Other Equipment:** Includes eye wash stations, fire monitors, emergency shutdown switches, and various valves (V1-V18) and tanks (T1-T9).

**26th Place**, adjoining the property to the west, is a Local Street–Standard, with a designated width of 60 feet and is improved with a paved roadway, concrete curb, gutter, and sidewalk. The street dead-ends into the perimeter wall of the project site with no traffic turn-around.

**27th Street**, adjoining the property to the south, is a Local Street–Standard, with a designated width of 60 feet and is improved with a paved roadway, concrete curb, gutter, and sidewalk.

### **Surrounding Land Uses**

Neighboring properties to the east are zoned R3-1-O-HPOZ and are improved with two-story multifamily dwellings (St. Andrews Garden Apartments). Neighboring properties to the west are zoned [Q]R4-1-O-HPOZ and R3-1-O-HPOZ and are improved with the two-story Carl Bean House (hospice care facility) and the two-story Servants of Mary Convent. Also located within 500 feet of the site are St. John of God Retirement and Care Center and the William Andrews Clark Memorial Library. Neighboring properties to the north are zoned R4-1-O-HPOZ and are improved with one and two-story buildings with a library (LA84 Foundation) and a seven-story residential building. Neighboring properties to the south are zoned RD2-1-O-HPOZ and are improved with single- and multi-family dwellings.

### **Site History**

The Murphy Oil Drill Site is located in Urbanized Oil Drilling District U-37 as established by Ordinance No. 114,701, which is located in the Las Cienegas Oil Field as identified by the California Geologic Energy Management Division (CalGEM). It is the only oil drilling and production facility active in this oil field. The Drill Site was first approved for five oil extraction and production wells on April 5, 1961. From May 2, 1961 to February 15, 1994, the Zoning Administrator, under various actions, granted approved plans for various activity, equipment, and apparatus in conjunction with the use of the Drill Site and its continued operations. On August 1, 2003, the Zoning Administrator approved the first Plan Approval (Case No. ZA 15227(O)(PA1) to allow the redrilling of two oil wells at the subject site. On April 15, 2005, the Zoning Administrator approved the second Plan Approval (Case No. ZA 15227(O)(PA2)) to address complaints of oil fumes and noise from the oil drilling operations at the subject site. The Zoning Administrator approved the third and fourth Plan Approvals (Case Nos. ZA 15227(O)(PA3) and ZA 15227(O)(PA4)) on March 13, 2006 and September 14, 2007, respectively, for redrilling of wells, expansion of an existing well cellar, drilling of wells, expansion of gas plant, and installation of a sound wall. On June 30, 2016, the Zoning Administrator denied the operator's request to install a clean enclosed burner, sound wall, and hours of operation modification (Case No. ZA 15227(O)(PA5)).

According to the City of Los Angeles Office of Finance LATAX report, E&B Natural Resources Management Corporation (the present Operator of the Drill Site) has been associated with the subject property since October 16, 2019.

On February 28, 2023, pursuant to Case No. ZA-1959-15227-O-PA6, the Zoning Administrator modified 14 existing conditions and imposed 19 new conditions to address issues raised by the community concerning the Drill Site's operations intended to increase the protection of oil drilling operations and to preserve the health, safety and general welfare of the residents and stakeholders of the neighborhood.

On March 13, 2023, the operator appealed the Zoning Administrator's decision under Case No. ZA-1959-15227-O-PA6, and on October 17, 2023 the appellate body, the South Los Angeles Area Planning Commission (the Commission), modified the Zoning Administrator's initial imposed 33 conditions for the continued operation of the existing Murphy Oil Drill Site

(Case No. ZA-1959-15227-O-PA6-1A). The Commission's letter of determination for Case No. ZA-1959-15227-O-PA6-1A was issued on January 31, 2024.

### **Background**

Since the Commission's imposition of conditions under Case No. ZA-1959-15227-O-PA6-1A, the Office of Zoning Administration (OZA) has received multiple complaints from surrounding residents, community stakeholders, and other interested parties concerning activities associated with the Murphy Oil Drill Site and alleging failures to comply with conditions of approval governing the operation. During the same period, state and regional regulatory agencies have issued notices of violation and other enforcement-related correspondence concerning site operations. Collectively, these complaints and agency actions raised questions regarding ongoing compliance with applicable regulatory requirements and conditions of approval.

Pursuant to Condition No. 18 of Case No. ZA-1959-15227-O-PA6-1A, the operator is required to submit an Annual On-Site Safety Inspection Report for the Drill Site. Since imposition of this condition, E&B Natural Resources Management Corp. has submitted three Annual On-Site Safety Inspection Reports, dated March 15, 2024, March 14, 2025, and March 11, 2026. In addition to documenting the results of the annual safety inspection, each report includes a third-party assessment of compliance with the conditions of approval applicable to the Drill Site. As part of the OZA's review of these reports, staff evaluated the information provided, compared reported activities to applicable conditions of approval, and identified issues requiring clarification or additional documentation.

Following review of the March 15, 2024 Annual On-Site Safety Inspection Report, staff from the OZA identified several matters requiring clarification. On June 7, 2024, the OZA issued correspondence requesting additional information regarding specific conditions and particular drill site details. The OZA's June 2024 inquiry to the operator was necessary because the submitted Annual Safety Inspection Report had numerous inconsistencies, and, as a result, required extensive clarification with the operator. In addition, the operator failed to provide complete explanations and information concerning a proposed well abandonment activity at the subject drill site as well as the operation of fenceline monitoring equipment. The operator also failed to provide complete details about the usage and operation of the natural gas-powered microturbine equipment at the drill site. Finally, the OZA requested that the operator identify compliance measures to ensure that truck deliveries to the facility cease occurring outside permitted hours of operation.

The operator responded on July 22, 2024. While the response provided additional information, further clarification on these issues was still warranted, and the OZA continued to monitor these issues as part of its ongoing oversight responsibilities and in consideration of continued stakeholder concerns.

In response, staff from the OZA undertook additional efforts to clarify compliance obligations and obtain information necessary to evaluate implementation of the conditions of approval. Staff met with representatives of E&B Natural Resources Management Corp. on May 19, 2025, and June 2, 2025, to discuss issues identified through review of the Annual Safety Inspection Report and other compliance-related matters. These meetings were intended to provide the operator an opportunity to address outstanding questions, clarify reporting and operational requirements, and facilitate compliance with the conditions of approval. Topics discussed included hours of operation, public transparency and annual reporting requirements, fenceline monitoring infrastructure and air quality reporting, microturbine operations, idle wells located on the site, notices of violation issued by regulatory agencies,

Los Angeles Department of Building and Safety complaints, and the status of the required enclosure structure. The OZA saw it necessary to continue raising these compliance issues to the operator in the summer of 2025 as these concerns continued to linger and even new issues were raised to the operator. With regard to the new issues raised, the OZA met with two representatives from E&B Natural Resources Management Corporation – Louis P. Zylstra, Jr. PE and Ted Cordova on May 19, 2025 and June 2, 2025. The following agenda items were discussed throughout the two meetings:

- Condition No. 6 - Adherence to hours of operation.
- Condition No. 18 - Annual reports and input from environmental, petroleum consultants, and community stakeholders.
- Condition No. 19 - Fenceline monitoring measurements and potential meeting with Scentroid contractor.
- Condition No. 21 - Transparency efforts. Rule 1148.2 planned activities on website and email newsletter.
- Condition No. 23 - Requirement to build a production area enclosure.
- Condition No. 25 - Question on microturbines usage.
- Condition No. 25 - 2H's (a third-party consultant contracted by the Operator) research into electric workover rigs.
- Condition No. 27 - Idle well regulations and status
- Recent SCAQMD equipment leak violation: NOV/NC Details: P78161 on 01/15/2025
- Confirmation of CalGEM final witness/review for plugged well, "Murphy 21"
- March 8th, 2024 Complaint submitted to LADBS Code Enforcement alleging unpermitted work at Drill Site

Following these meetings, several matters remained unresolved or required additional documentation. Accordingly, on September 2, 2025, the OZA issued a Letter of Communication to E&B Natural Resources Management Corp. memorializing issues discussed with the operator and requesting additional information regarding ongoing areas of inquiry regarding possible non-compliance with Conditions of Approval Nos. 6 (hours of operation), 18 (annual reporting to meet public transparency obligations), 19 (fenceline air monitoring system), 21 (landing page to meet public transparency obligations), 23 (finalization of the required structure around the oil production area), 25 (equipment, energy usage, prohibited microturbine operations), and 27 (idle well status and regulatory compliance). The letter also addressed issues raised prior surrounding Southern California Air Quality Management District (SCAQMD) leak violations and a Los Angeles Department of Building and Safety Code Enforcement complaint dated March 8, 2024.

The operator subsequently provided responses to the OZA, including a written response dated November 24, 2025; however, additional questions and outstanding items remained.

In addition to the compliance matters discussed above, the OZA continued to receive

complaints and inquiries concerning operational activities occurring at the site. During Fall 2025, the operator conducted hydrostatic pipeline pressure testing at the Drill Site from November 5 to November 13, 2025. The OZA was only made aware of the nature of activity following the start of the work, and interviews/investigations with the operator and their subcontractor. The activity generated complaints from nearby stakeholders regarding noise, vibration, odors, equipment usage, and allegations that portions of the testing occurred outside the authorized hours of operation. During the same period, SCAQMD issued odor-related notices of violation associated with the testing activity. OZA staff reviewed the complaints and sought information regarding the scope and nature of the work as part of its ongoing compliance oversight responsibilities. The incident demonstrated significant deficiencies in operational accountability and regulatory coordination, resulting in regulatory violations, uncertainty regarding responsibility for the work, and documented and alleged nuisance impacts to nearby community members.

Beginning in or about March 2026, the OZA received additional resident complaints regarding noise-generating activity, describing the work as "...loud, sending the clang of metal piping and revving of the workover rig's diesel engine into our neighborhood." The resident submitted a picture of the workover rig and pointed out that there was no sound wall on the east side of the workover rig and the sound wall had gaps. On March 18, 2026, the Office of Councilmember Heather Hutt, Council District 10, raised a similar noise concern to the OZA. According to OZA records, the nature and purpose of the activity were not readily apparent from information available to staff. In response, OZA staff contacted the operator on multiple occasions to obtain clarification regarding the work being performed, including through telephone and email communications. On March 26, 2026, the operator replied that the noise was due to well servicing on the following wells:

| Job | Well                | Description                                                               | Start Date | End Date |
|-----|---------------------|---------------------------------------------------------------------------|------------|----------|
| 1   | Producing Well M-23 | Hole in Tubing                                                            | 3/9/26     | 3/10/26  |
| 2   | Producing Well M-22 | Sanded Pump                                                               | 3/11/26    | 3/18/26  |
| 3   | Producing Well M-23 | Returned to well for an additional Hole in Tubing not found during Job #1 | 3/19/26    | 3/20/26  |

Even though the operator explained that the work ended on March 20, 2026, the noise persisted through approximately April 10, 2026. The OZA contacted the operator, but they did not provide a response as to the continuing noise, and questions remained regarding the precise nature, duration, and operational characteristics of the activity. As a result, this spurred OZA staff to conduct two site visits on March 13, 2026 and March 20, 2026. During those site visits, staff observed first hand elevated noise and identified the potential failures to meet the sound abatement requirements per conditions of approval of Case No. ZA-1959-15227-O-PA6-1A. Furthermore, because the operator did not provide an adequate amount of information, the OZA's ability to fully evaluate the complaints was limited.

Notwithstanding the OZA's repeated efforts to obtain clarification through review of Annual On-Site Safety Inspection Reports, meetings with the operator, correspondence, and ongoing communications, complaints from stakeholders and regulatory issues identified by other agencies continued to arise. Since January 31, 2024, the date when the Area Planning Commission issued their appeal determination pursuant to Case No. Case No. ZA-1959-15227-O-PA6-1A, the OZA has consistently had to request additional information

from the operator regarding numerous compliance issues related to constituent complaints about the operation. In response, the operator has provided only incomplete proof of compliance. The administrative record illustrates the OZA's concern for the operator's compliance record as early as weeks following the 2024 APC determination and as recently as April 2026. Over the two years that have lapsed since the 2024 determination, concerned residents have provided significant amounts of evidence alleging noncompliance, such as drill site trucks arriving outside the permitted hours of operation. On several occasions, the OZA has needed to contact the operator for information not initially provided by the operator. That is, the operator has in numerous instances not contacted the OZA in proactive measures to avoid confusion and instead contributed to fragmented communication regarding drill site activities. As documented in the administrative record, the operator was made aware, for over two complete calendar years, that the OZA takes the matter of condition compliance very seriously and strict compliance is required as part of the drill site's conditional approval to operate at the subject site.

Notably, several recurring topics—including hours of operation, public reporting and transparency, fenceline monitoring, microturbine operations, idle wells, and regulatory notices of violation—were initially identified through the OZA's review of the Annual On-Site Safety Inspection Reports and continued to reappear through subsequent complaints, agency enforcement actions, and staff review. The OZA's review therefore evolved from informal compliance discussions to formal requests for information and documentation as part of its ongoing evaluation of the operator's compliance with the conditions of approval. The continued need for OZA staff intervention, together with recurring complaints, agency citations, and unresolved compliance questions, has necessitated further review of the site's compliance status through the subject nuisance abatement/revocation proceedings as a means to protect the public peace, health, and safety of the community surrounding the Drill Site from potential nuisance, and to address potential violations of conditions of approval encumbering the land use.

Copies of the Letters of Communications, the operator's response letters, complaint records, agency correspondence, and related materials are included in the subject case file and form part of the administrative record.

### **Nuisance Investigation**

As outlined in the review of conditions below, there is evidence that the subject drill site has been potentially operating out of substantial compliance with the conditions of approval listed in Case No. ZA-1959-15227-O-PA6-1A and potentially jeopardizing the public peace, health, and safety of the community surrounding the Drill Site through repeated alleged nuisance activity. Field investigations were conducted in response to outstanding questions regarding compliance, multiple state and regional notices of violations, correspondence from surrounding residents and community stakeholders raising concerns regarding the findings made in the operator's annual report, and impacts reported during the pipeline pressure test and other operations that created nuisances for the surrounding area. In addition, on February 25, 2026 the City Council (Council File No. 26-0059) passed a motion with instructions, as follows:

*“INSTRUCT the Department of City Planning, with the assistance of the Department of Building and Safety and the Los Angeles Police Department, and in consultation with the City Attorney, to investigate any matters of reported nuisance activities occurring onsite at the properties located at 2126 West Adams Boulevard, Los*

*Angeles, CA 90018 and 2125 West 26th Place, Los Angeles, CA 90018; and thereafter, the Zoning Administrator may initiate Administrative Nuisance Abatement Proceedings per Los Angeles Municipal Code Section 12.27.1; Chapter 1A Section 13B.6.2; and prepare the necessary reports and recommendations, conduct the required public hearings, and thereby protect the public peace, health, and safety of the community by imposing corrective conditions to address the reported nuisance activities that are occurring onsite at the property.”*

City Council’s direction to investigate the drill site’s operation supports the complaints raised by neighbors and stakeholders as well as notices of violation issued by other agencies identifying operational deficiencies on the site. Collectively, residents and stakeholders’ complaints and notice violations issued by other agencies, warranted further review and investigation of the site’s compliance status and the potential impacts of ongoing operations on the surrounding areas.

As documented, there is evidence of potential violations of conditions of approval encumbering the land use and that the Drill Site operations may currently jeopardize and adversely affect the public health, peace, and safety of persons residing or working on the premises and in the surrounding area. As a result, the OZA has responded on its own accord, based on its independent investigation, with a public hearing for possible imposition of Conditions to abate nuisance, or to revoke said use.

Planning staff conducted three field analyses on March 13, 2026 between 1:30 p.m. and 2:30 p.m., March 20, 2026 between 2:27 and 2:36 p.m., and June 6, 2026 between 8:30 p.m. and 10:30 p.m., as part of the nuisance investigation to observe the surrounding area and further understand compliance with the conditions of approval of Case No. ZA-1959-15227-O-PA6-1A. All photos included in this Staff Investigator Report were taken on said dates.

### **Preliminary Compliance Assessment of Case No. ZA-1959-15227-O-PA6-1A Conditions**

*The following is a preliminary assessment of the compliance status of Conditions of Approval for Case No. ZA-1959-15227-O-PA6-1A, based on the investigation, research, and analysis of OZA staff. This assessment identifies issues of concern for the Zoning Administrator’s consideration. Any determination by the Zoning Administrator regarding compliance with the imposed conditions will be made after consideration of the administrative record, including all evidence and public testimony.*

1. *Prior to any clearance on a building permit per Condition No. 23, a revised plot plan shall be provided showing the current production equipment locations on-site. Said plot plan shall provide a detailed description and inventory of production equipment, such as tanks, vessels, compressors, scrubbers, separators, micro-turbines, etc.*

**Staff Comment: In compliance.** The plot plan that was included in the On-Site Safety Inspection Report dated March 2025 shows the equipment, tanks, vessels, compressors, scrubbers, separators, and microturbines.

2. *All terms and conditions specified under extant ZA Case No. 15227, dated April 5, 1961, shall be strictly complied with, except as modified/clarified as follows:*

**Staff Comment: In compliance,** except as noted below for the applicable conditions that have been listed as out of compliance or partially compliant.

3. *All the conditions set forth in Section 13.01-E, 2 as well as Condition Nos. 3, 4, 5, 8, 9, 17, 18, 19, 22, 23, 33, 37, 40, 50, 54, 58, and 59 of Subsection F of Section 13.01 of the Municipal Code are included in and by reference made a part of this approval and shall be complied with to the same extent as if herein restated in detail.*

**LAMC Section 13.01 E.**

2. *Urbanized Areas. Each oil drilling district established in an urbanized area shall be subject to the following conditions:*

*(a) Each district shall be not less than 40 acres in area, including all streets, ways and alleys within the boundaries thereof.*

**Staff Comment: In compliance.** The subject site is within a district exceeding 40 acres per Zone Designation and CalGEM Maps (Las Cienegas Field, Oil Drilling District U-37 established by Ordinance No. 114,701). Oil Drilling District U-37 is approximately 155 acres in area.

*(b) Not more than one controlled drill site shall be permitted for each 40 acres in any district and that site shall not be larger than two acres when used to develop a district approximating the minimum size; provided, however, that where the site is to be used for the development of larger oil drilling districts or where the Zoning Administrator requires that more than one oil drilling district be developed from one controlled drilling site, the site may be increased, at the discretion of the Zoning Administrator when concurred in by the Board of Fire Commissioners, by not more than two acres for each 40 acres included in the district or districts. (Amended by Ord. No. 173,268, Eff. 7/1/00, Oper. 7/1/00.)*

**Staff Comment: In compliance.** There are no other controlled drill sites in Oil Drilling District U-37. The subject site's area is approximately 2.8 acres, including approximately 1.77 acres of oil production area, and an open area fronting 27th Street not used for oil production.

*(c) The number of oil wells Class A which may be drilled and operated from any controlled drilling site may not exceed one well to each five acres in the district or districts to be explored from said site. (Amended by Ord. No. 147,651, Eff. 10/11/75.)*

*Notwithstanding the above, should the City Council determine that an urbanized oil drilling district contains more than one producing zone, the City Council may then authorize, by ordinance, the drilling of additional oil wells Class A, not to exceed one well per five acres for each identified producing zone, and specify the maximum number of wells to be drilled as the result of such authorization.*

**Staff Comment: In compliance.** According to records obtained from CalGEM, there are no Class A/I wells on the site. The type of wells on the site are waterflood (Class B/II) wells.

*(d) Each applicant, requesting a determination by the Zoning Administrator prescribing the conditions controlling drilling and production operations, as provided in Subsection H. of this section, must have proprietary or contractual authority to drill for oil under the surface of at least 75 percent of the property in the district to be explored. (Amended by Ord. No. 173,268, Eff. 7/1/00, Oper. 7/1/00.)*

**Staff Comment: In compliance.** According to the City of Los Angeles Office of Finance LATAX report, E&B Natural Resources Management Corporation (the present Operator of the Drill Site) has been associated with the subject property since October 16, 2019. The nuisance abatement/revocation case herein does not consider any discretionary requests by the Operator to authorize new drilling and productions operations.

*(e) Each applicant or the applicant's successor in interest shall, within one year from the date the written determination is made by a Zoning Administrator prescribing the conditions controlling drilling and production operations as provided in Subsection H. of this section, execute an offer in writing giving to each record owner of property located in the oil drilling district who has not joined in the lease or other authorization to drill the right to share in the proceeds of production from wells bottomed in the district, upon the same basis as those property owners who have, by lease or other legal consent, agreed to the drilling for and production of oil, gas or other hydrocarbon substances from the subsurface of the district. The offer hereby required must remain open for acceptance for a period of five years after the date the written determination is made by a Zoning Administrator. During the period the offer is in effect, the applicant, or the applicant's successor in interest, shall impound all royalties to which the owners or any of them may become entitled in a bank or trust company in the State of California, with proper provisions for payment to the record owners of property in the district who had not signed the lease at the time the written provisions were made by a Zoning Administrator, but who accepts the offer in writing within the five-year period. Any such royalties remaining in any bank or trust company*

*at the time the offer expires which are not due or payable as provided above shall be paid pro-rata to those owners who, at the time of the expiration, are otherwise entitled to share in the proceeds of the production. (Amended by Ord. No. 173,268, Eff. 7/1/00, Oper. 7/1/00.)*

**Staff Comment: In compliance.** There are no other active oil producing sites within this oil district (Las Cienegas Field, Oil Drilling District U-37). See Ordinance No. 114,701 map.

*(f) The entire controlled drilling site shall be adequately landscaped, except for those portions occupied by any required structure, appurtenance or driveway, and all landscaping shall be maintained in good condition at all times. Plans showing the type and extent of the landscaping shall be first submitted to and approved by the Zoning Administrator. (Amended by Ord. No. 173,268, Eff. 7/1/00, Oper. 7/1/00.)*

**Staff Comment: In compliance.** Case No. ZA-1959-15227-O-PA6-1A Condition No. 4 includes provisions for landscaping on the site. See discussion of Condition No. 4 below.

*(g) Each applicant, requesting a determination by a Zoning Administrator prescribing the conditions controlling drilling and production operations, as provided in Subsection H. of this section, shall post in the Office of Zoning Administration a satisfactory corporate surety bond (to be approved by the City Attorney and duplicates to be furnished to the City Attorney) in the sum of \$5,000 in favor of the City of Los Angeles, conditioned upon the performance by the applicant of all of the conditions, provisions, restrictions and requirements of this section, and all additional conditions, restrictions or requirements determined and prescribed by a Zoning Administrator. No extension of time that may be granted by a Zoning Administrator or any change or specifications or requirements that may be approved or required by the Zoning Administrator or by any other officer or department of the City or any other alteration, modification of waiver affecting any of the obligations of the grantee made by any City authority or by any other power or authority whatsoever shall be deemed to exonerate either the grantee or the surety on any bond posted pursuant to this section. (Amended by Ord. No. 173,268, Eff. 7/1/00, Oper. 7/1/00.)*

**Staff Comment: In compliance.** According to the Office of Zoning Administration records, there are surety bonds held by E&B Natural Resources that encompass the Murphy Oil Drill Site. The following bonds held by the operator for the Drill Site include:

- Franchise Faithful Performance Bond, No 1104337, Hanover Insurance Group, dated May 8, 2025.
- Oil Well Surety Bond No. B015302, U.S. Specialty Insurance Company dated January 25, 2024

*(h) If a Zoning Administrator determines, after first receiving a report and recommendation from the Board of Public Works or its designee, that oil drilling and production activities within the district have caused or may cause subsidence in the elevation of the ground within the district or in the immediate vicinity, then after consulting with recognized experts in connection with that problem and with those producing hydrocarbons from the affected area, the Zoning Administrator shall have the authority to require the involved oil producer or producers to take corrective action, including re-pressurizing the oil producing structure or cessation of oil drilling and production. (Amended by Ord. No. 185,205, Eff. 11/22/17.)*

**Staff Comment: In compliance.** No report from the Board of Public Works has been submitted indicating subsidence on the site.

*(i) A Zoning Administrator may impose additional conditions or require corrective measures to be taken if the Zoning Administrator finds, 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 surrounding property. (Amended by Ord. No. 173,268, Eff. 7/1/00, Oper. 7/1/00.)*

**Staff Comment: Zoning Administrator's discretion.** Additional conditions of approval have been imposed regulating the oil production activities on the site as recently as with Case No. ZA-1959-15227-O-PA6-1A. The Zoning Administrator retains their right to impose additional conditions or require corrective measures through action on the subject case and potential future actions.

#### **LAMC Section 13.01 F.**

*3. That the operator of any well or wells in the district shall post in the Office of Zoning Administration a \$5,000 corporate surety bond conditioned upon the faithful performance of all provisions of this article and any conditions prescribed by a Zoning Administrator. No extension of time that may be granted by a Zoning Administrator, or change of specifications or requirements that may be approved or required by a Zoning Administrator or by any other officer or department of the City, or other alteration, modification or waiver affecting any of the obligations of the grantee made by any City*

*authority shall be deemed to exonerate either the grantee or the surety on any bond posted as required in this article. (Amended by Ord. No. 173,268, Eff. 7/1/00, Oper. 7/1/00.)*

**Staff Comment: In compliance.** According to the Office of Zoning Administration records, the operator has a surety bond (Franchise Faithful Performance Bond, Hanover Insurance Group, No 1104337) dated May 8, 2025.

*4. That the operators shall remove the derrick from each well within thirty (30) days after the drilling of said well has been completed, and thereafter, when necessary, such completed wells shall be serviced by portable derricks.*

**Staff Comment: In compliance.** There are no derricks on the site.

*5. That the drilling site shall be fenced or landscaped as prescribed by the Zoning Administrator. (Amended by Ord. No. 173,268, Eff. 7/1/00, Oper. 7/1/00.)*

**Staff Comment: In compliance.** Case No. ZA-1959-15227-O-PA6-1A includes provisions for landscaping (Condition No. 4, see discussion below), and there is fencing on the site comprised of tubular steel fence on the southern portion and a masonry wall along the north end of the facility fronting Adams Boulevard.

*8. That adequate fire fighting apparatus and supplies, approved by the Fire Department, shall be maintained on the drilling site at all times during drilling and production operations.*

**Staff Comment: In compliance.** The Drill Site is required to comply with all applicable safety requirements of the Los Angeles Fire Code. No violations from the LAFD were reported.

*9. That no refining process or any process for the extraction of products from natural gas shall be carried on at a drilling site.*

**Staff Comment: In compliance.** No reporting of oil refining operations from the site have been received or conducted on the site.

*17. That any person requesting a determination by the Zoning Administrator prescribing the conditions under which oil drilling and production operations shall be conducted as provided in Subsection H., shall agree in writing on behalf of the person and the person's successors or assigns, to be bound by all of the terms and conditions of this article and any conditions prescribed by*

*written determination by the Zoning Administrator; provided, however, that the agreement in writing shall not be construed to prevent the applicant or the applicant's successors or assigns from applying at any time for amendments pursuant to this Article or to the conditions prescribed by the Zoning Administrator, or from applying for the creation of a new district or an extension of time for drilling or production operations. (Amended by Ord. No. 173,268, Eff. 7/1/00, Oper. 7/1/00.)*

**Staff Comment: In compliance.** Covenant and Agreement (Instrument No. 2024-0407961) was recorded on June 24, 2024 with the Los Angeles County Records Office, acknowledging the conditions of approval on the site established in Case No. ZA-1959-15227-O-PA6-1A.

*18. That all production equipment used 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 ever be permitted to result from production operations carried on at any drilling 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.*

**Staff Comment: Not in compliance.** See detailed discussion below of Case No. ZA-1959-15227-O-PA6-1A, Condition No. 10.

*19. Wells which are placed upon the pump shall be pumped by electricity with the most modern and latest type of pumping units of a height of not more than sixteen (16) feet. All permanent equipment shall be painted and kept in neat condition. All production operations shall be as free from noise as possible with modern oil operations.*

**Staff Comment: Partial compliance.** All pumps on the site are electrically operated. There is no indication that the equipment is unpainted. However, as discussed under the analysis for Condition Nos. 7 and 23 for Case No. ZA-1959-15227-O-PA6-1A below, requirements for sound buffering apparatuses and structures intended in part to reduce operational noise remain incomplete or not fulfilled at all.

*22. Upon the completion of the drilling of a well the premises shall be placed in a clean condition and shall be landscaped with planting of shrubbery so as to screen from public view as far as possible, the tanks and other permanent equipment, such landscaping and shrubbery to be kept in good condition.*

**Staff Comment: In compliance.** The premises appeared to be in clean condition during staff's field visits on March 13, 2026, March 20, 2026, and June 6, 2026; there was no visible evidence of trash. The facility along Adams Boulevard, 26th Place, and 27th Street is screened with landscaping, including trees and shrubbery. See further discussion of landscape screening under Condition No. 4 below. It should be noted that although the Drill Site appeared in clean condition during staff's field visits in 2026, graffiti was observed on the site for a period of time from at least April 2024 to June 2024, until the operator covered over it at the request of the OZA (see further discussion under Condition No. 13 below).

*23. That not more than two wells may be drilled in each city block of the drilling district and bottomed under that block. However, at the discretion of the Zoning Administrator, surface operations for additional wells may be permitted in each of the blocks where each additional well is to be directionally drilled and bottomed under an adjacent block now or hereafter established in an oil drilling district in lieu of a well drilled on the adjacent block and under a spacing program which will result in not exceeding two wells bottomed under each block. (Amended by Ord. No. 173,268, Eff. 7/1/00, Oper. 7/1/00.)*

**Staff Comment: In compliance.** There are presently 32 wells at the drill site. The number of wells and operation has been permitted by Case No. ZA-15227 and subsequent plan approvals.

*33. That drilling operations shall be commenced within 90 days from the effective date the written determination is made by the Zoning Administrator or Area Planning Commission, or within any additional period as the Zoning Administrator may, for good cause, allow and thereafter shall be prosecuted diligently to completion or else abandoned strictly as required by law and the premises restored to their original condition as nearly as practicable as can be done. If a producing well is not secured within eight months, the well shall be abandoned and the premises restored to its original condition, as nearly as practicable as can be done. The Zoning Administrator, for good cause, shall allow additional time for the completion of the well. (Amended by Ord. No. 173,268, Eff. 7/1/00, Oper. 7/1/00.)*

**Staff Comment: In compliance.** Drilling operations are currently ongoing pursuant to Zoning Administrator authorization and the operator has not indicated any intention to cease drilling operations on this site.

*37. All waste substances such as drilling muds, oil, brine or acids produced or used in connection with oil drilling operations or oil production shall be*

*retained in water-tight receptors from which they may be piped or hauled for terminal disposal in a dumping area specifically approved for such disposal by the Los Angeles Regional Water Pollution Control Board No. 4.*

**Staff Comment: In compliance.** There have not been violations from responsible agencies regarding the disposal of oil production residues.

*40. The Department of Water and Power of the City of Los Angeles shall be permitted to review and inspect methods used in the drilling and producing operations and in the disposal of waste, and shall have the right to require changes necessary for the full protection of the public water supply.*

**Staff Comment: In compliance.** No reports from LADWP have been received regarding this site denying access to the site to review operations.

*50. That no earthen sumps shall be used.*

**Staff Comment: In compliance.** No oil earthen sumps are on the site.

*54. That there shall be no tanks or other facilities for the storage of oil erected or maintained on the premises and that all oil products shall be transported from the drilling site by means of an underground pipe line connected directly with the production pump without venting products to the atmospheric pressure at the production site.*

**Staff Comment: In compliance.** There are no storage tanks on the site. All produced oil is transported from the site utilizing underground pipes to remote storage facilities.

*58. That no sign shall be constructed, erected, maintained or placed on the premises or any part thereof, except those required by law or ordinance to be displayed in connection with the drilling or maintenance of the well.*

**Staff Comment: In compliance.** Signage on the site only includes those in connection with the drill site's operations.

*59. That suitable and adequate sanitary toilet and washing facilities shall be installed and maintained in a clean and sanitary condition at all times.*

**Staff Comment: In compliance.** No violation regarding the labor practices nor health department violations have been reported. The site has an office building; toilet facilities are required in order to establish occupancy and satisfy building code requirements.

4. *Landscaping of the site shall be maintained as follows:*

- a. *With respect to that portion of the drill site south of the cement block wall and facing 27th Avenue, the applicant shall: (1) remove the invasive/noxious plants; (2) plant and/or maintain 3 to 4 trees (of 24-inch box size) as infill trees along the south facing facility wall; (3) plant and/or maintain Ficus or climbing ivy, or similar plant-life (grown to 5 gallon size containers) along the South facing facility wall; (4) spread and/or maintain wildflower/grass mix in the open areas of south parcel (approx. 3/4 ac.); (5) install and/or maintain drip irrigation systems on the new plantings along south facing facility wall; (6) provide for temporary watering of the grasses and place sprinklers on timers to insure proper maintenance of the grassy area; (7) install and/or maintain new or improved cyclone fencing along 27th Avenue; (8) improve the appearance of the east fence by painting it; (9) install and/or maintain meandering dry creek bed hardscape on the south parcel, utilizing recycled broken concrete foundations from Drill Site facilities (final placement, configuration and length dependent on pipeline easement and other site facility considerations); (10) work with 10th Council District office (or its successor office) and Archdiocese to allow future public access.*

**Staff Comment: In compliance.** On March 13, 2026, Staff conducted a site visit and observed landscaping along Adams Boulevard that included trees planted approximately 12 feet apart. The trees are maintained to a height of approximately 12 feet. Also along Adams Boulevard, there are two vehicular ingress/egress driveways that are landscaped with succulent vegetation, mature trees and palm trees. There is an 8-foot masonry wall fence in the front yard.

Staff also observed landscaping along 27th Place that appeared to be maintained, consisting of trees and shrubs with an irrigation system and dry creek bed hardscape.

On December 3, 2025, the operator forwarded to the Office of the Zoning Administration an email indicating to have conducted their most recent yearly-required walk-through on December 2, 2025 with Council District 10.

- b. *With respect to that portion of the drill site east of the cement block wall and fronting on Adams Boulevard, the applicant shall: (1) install and/or maintain new/improved cyclone fencing along Adams, including raising the east facing step wall which is only 2-3 feet high; (2) upon receipt of the adjacent property owners' approval, install and/or maintain 2-foot high wrought iron fencing (or equivalent) on top of existing block wall (approximately 300 feet); (3) remove graffiti on east wall; (4) improve and/or maintain wall on west side of the parcel by painting and installing new cyclone inserts; (5) level and place gravel surface on approximately half the depth of the lot and place barriers to protect the remaining portion of the lot; obtain permits for use as a temporary parking lot; (6) install*

*and/or maintain parking lot lighting; (7) plant and/or maintain ficus/climbing ivy, or similar along east and west walls to enhance its appearance (using 5 gallon size container plantings); (8) install and/or maintain drip irrigation on new plantings; (9) install and/or maintain sprinkler timers.*

**Staff Comment: Partial compliance.** On February 28, 2023, pursuant to Case No. ZA-1959-15227-O-PA6, the Zoning Administrator found that the operator was in compliance with Condition 4.b, stating that the majority of the required work was completed before E&B Natural Resources took over operations. As part of that action, the Zoning Administrator modified Condition 4.b to additionally require these already completed improvements to be maintained. The South Los Angeles Area Planning Commission upheld the modified condition imposed by the Zoning Administrator in their January 31, 2024 determination of Case No. ZA-1959-15227-O-PA6-1A. Based on the field analyses conducted by OZA staff on March 13, 2026, March 20, 2026, and June 6, 2026, these existing site improvements appeared to be maintained, with the exception of the sixth requirement to “install and/or maintain parking lot lighting”. During the evening site visit on June 6, 2026, staff did not observe any outdoor lighting, including within the parking lot area.

- c. A yearly review of the landscaping shall be conducted by the applicant with the Council District Office and the United Neighborhoods Neighborhood Council.*

**Staff Comment: In compliance.** According to email correspondence from E&B Natural Resources dated December 3, 2025, on December 2, 2025, the operator conducted its most recent yearly-required landscape review (walk-through) with Council District 10 representative and United Neighborhoods Neighborhood Council representative.

- 5. That driveway access for ingress and egress to the drilling site shall be provided through the existing driveways fronting on Adams Boulevard. Furthermore, that the existing parking area on the enclosed drilling site area for use by vehicles employed in drilling and maintaining of oil wells on the property and for parking of automobiles of employees engaged in the drilling and production activities shall be augmented by additional parking on the area on the East of the drill site, outside of the enclosed area, which area shall be leveled and covered with a gravel surface to approximately one-half the depth of the lot for use as additional parking for employees. Parking on the east side of the drill-site, outside of the enclosed area, shall not be used for heavy trucking operations or staging or storage of any. All such driveways and parking areas shall be regularly washed down, swept or otherwise kept free of accumulated cement, dust, or other materials which would produce dust in the use of said facilities. There shall be no access to the site from 27th Street except for maintenance of the landscaped area fronting on 27th Street and south of the wall separating the landscaped area from the production site. Additionally, there shall be no parking of any vehicles by workers or equipment servicing the site on*

*27th Street. Except for access by SoCalGas Company to service or operate its equipment, any access for the maintenance of any infrastructure for the production site.*

**Staff Comment: In compliance.** Vehicular and pedestrian access to the site is via Adams Boulevard. No complaints regarding employee parking on public streets have been provided. Based on plans submitted, employee parking is provided on site. Heavy trucks are able to park on site at designated areas. No complaints of dust during operations have been submitted. No evidence has been submitted that would indicate that the operator is in violation of this condition.

6. *As further amplification of Condition No. 49 of Section 13.01-F of the Municipal Code, except for actual drilling and production operations, which may be conducted 24 hours a day, seven days a week, no work shall be conducted on the property between the hours of 7:00 p.m. of one day and 7:00 a.m. of the following day or on Sundays. While actual drilling operations are being conducted between the hours of 7:00 p.m. and 7:00 a.m., the applicant shall operate its facility in "Quiet Mode". "Quiet Mode" shall mean that where possible, operation components shall be covered with acoustical shields/material, that all audible backup alarms shall be disabled and replaced with a spotter for safety purposes; operation of the cellar pump shall cease; the applicant's employees and contractors shall be prohibited from yelling, and the Derrick Man and Driller shall communicate by walkie-talkie only when the Derrick Man is on the derrick; no horns shall be used to signal for time for connection or to summon crew (except that a horn may be used for emergency purposes only). The applicant shall conduct on-site meetings to inform all personnel of quiet mode operations.*

*In case of an emergency, all restrictions on the hours of operations shall be suspended for as long as is necessary to resolve the emergency situation, and for no longer.*

*Notwithstanding the foregoing, during the period necessary to set up and move the drilling or workover rig off the premises, and to conduct drilling or re-drilling operations as herein authorized, heavy ("permitted" oversized/overweight load) truck deliveries shall be permitted from 7:00 a.m. to 9:30 p.m., on week-days and none during week-ends and holidays. Deliveries shall be made by approaching the facility off of Adams Boulevard exclusively. Delivery trucks are to be staged offsite so as to reduce the time that trucks need to wait to enter the facility. If there is not sufficient room within the interior of the facility to accommodate a given heavy delivery truck, the applicant shall not call for the delivery of such heavy truck unless and until another heavy delivery truck parked within the facility is scheduled to leave the facility within 15 minutes. The maximum number of heavy truck deliveries allowed for moving the drilling rig on and off the premises shall not exceed 20 loads per day for a period of four days. Except for the four days required to move the drilling rig on and off the premises, the number of "permitted" truck deliveries per day (week-days only, none on week-ends and holidays) shall be limited to a maximum of ten. The number of "non-permitted" truck deliveries per day (week-days*

*only) shall be limited to a maximum of ten. The number of "non-permitted" truck deliveries per day (week-ends and holidays only) shall be limited to a maximum of five.*

*The applicant shall give all abutting property owners written notice (in both English and Spanish), served by mail at least seven days prior to the dates when heavy truck traffic will commence related to moving the rig in for the drilling or re-drilling of wells.*

*The operator shall also provide a landing page on a publicly available website where interested parties can sign up for email alerts as a supplemental effort for notification purposes. The operator shall provide the web address for the publicly accessible website within six (6) calendar months of the final determination of Case No. ZA-1959-15227-O-PA6. This information shall be posted on the website in the following languages that are the threshold languages, which are subject to change at any time, for a 1,500-foot radius of the Murphy Drill Site in Los Angeles County: English, Spanish, Korean, Simplified and Traditional Chinese, Arabic, Russian, Vietnamese, Tagalog.*

**Staff Comment: Not in compliance.** Time-stamped videos submitted show work activities were performed on 67 different occasions outside the permitted hours of operations. The first sentence of this condition limits operations on the site for specified hours, requiring that "no work shall be conducted on the property between the hours of 7:00 p.m. of one day and 7:00 a.m. of the following day or on Sundays." This condition not only limits work activities, but also restricts vehicular activity (light and heavy vehicles) on the site during those hours.

In addition, no evidence from the operator was received indicating that the work performed during the "Quiet Mode" operating hours were in response to emergencies.

Pursuant to this condition, the operator is required to mail written notice to abutting property owners when there is to be heavy truck traffic in conjunction with the drilling or re-drilling of wells. No such drilling activity has occurred since January 2024, so this component of this condition does not apply.

Although there is a website (landing page) available for the Murphy Oil Drilling site, the website does not support languages other than English. Therefore, there is no option to view the website in Spanish, Korean, Simplified and Traditional Chinese, Arabic, Russian, Vietnamese, and Tagalog languages.

7. *Until a permanent structure, set at a minimum of 30 feet in height to a maximum of 45 feet in height, is built enclosing the production area on four sides, in accordance with Condition No. 23, and, afterward for any portion of a workover, maintenance or drilling rig which exceeds 45 feet in height, the applicant shall install the following sound mitigation systems and implement administrative noise controls as follows:*

- a. *Erect a 30-foot high blanket sound wall on the west, south and east side of the any workover, maintenance or drilling rig at the Murphy drilling site (west, south and east side property line), with the layout and wall lengths determined after the drilling, workover or maintenance rig and equipment positioning has been established. Install the sound wall as close as possible to the drilling, workover or maintenance rig and associated equipment with no gaps or openings in the walls. The sound wall material should have a minimum STC rating of 25. Sound wall gates shall be installed with the same sound loss rating as the wall material and the gates shall be closed at all times except for material delivery or pick up. The sound wall shall not be maintained for more than 120 continuous days. Should unforeseeable mechanical problems warrant the maintenance of the sound wall for a period exceeding the 120 continuous days, the applicant shall notify the Office of Zoning Administration and Council Office and inform the owners and occupants of surrounding property of the reasons for and estimated duration of the delay in the dismantlement of the wall.*

**Staff Comment: Not in compliance.** During the site visit on March 13, 2026, staff observed workover operations (hammering noise) which were partially shielded with sound blankets. The sound wall barriers (acoustical blankets) were approximately 30 feet in height. The barriers were partially installed, enclosing the maintenance/service operation partially along the west, but there was a gap along the south. Staff noted elevated noise emanating throughout the area.

On March 20, 2026, OZA staff conducted an exterior site visit at 2:27 P.M. and observed a workover rig at the Drill Site. Staff observed that there were sound walls set up around the workover rig with the exception of the east side of said workover rig. A "Note to File" prepared by OZA staff in the form of email correspondence and photographs dated March 20, 2026 is included in the Administrative Record as evidence of potential non-compliance with Condition No. 7. A constituent submitted photographic evidence also on March 20, 2026 illustrating the absence of a sound curtain on the east side of the workover rig. The constituent remarked in their email correspondence that they observed significantly elevated noise levels emanating from the operation of the workover rig. The constituent also highlighted the gaps in between the sound curtains that were placed around the workover rig; photos taken during OZA staff's visit on March 20, 2026 also illustrate gaps in between the sound curtains placed on the south and west sides around the rig.



Looking Southeast. Workover rig performing unspecified work. West facing soundmat does not fully cover the operation being performed. (Photo taken March 13, 2026)



Looking south. Workover rig performing unspecified work. Gaps between the south facing soundmats. (Photo taken March 13, 2026)

- b. *[Condition 7.b was deleted in Case No. ZA-1959-15227-O-PA4]*
- c. *To reduce sound from the drilling, workover or maintenance rig's sub-structure, acoustical blankets shall be hung from the exterior of the rig floor down to the ground,*

*covering the open area of the rig sub-structure on the side of the rig facing the west property line until the completion of the minimum of 30 feet and maximum of 45 feet in height enclosure that shall be open to the sky.*

**Staff Comment: Not in compliance.** During the site visit on March 13, 2026, staff observed operations (hammering) which were only partially shielded. The sound wall barriers were approximately the minimum height of 30 feet. The barriers failed to fully enclose the operation along the western and southern edges of the operation. No acoustical blankets were installed at the east side of the operation.

- d. The stabbing platform on the rig's derrick shall be enclosed with STC-25 rated acoustical blankets.*

**Staff Comment: Not in compliance.** During the site visit on March 13, 2026, the acoustical blanket along the south had visible gaps in coverage and no acoustical blanket was installed along the east side of the operation.

- e. To mitigate the drilling, workover or maintenance rig draw works and brake noise level, sound damping acoustical material shall be installed and maintained during drilling activities.*

**Staff Comment: Not in compliance.** During the field visit on March 13, 2026, the maintenance operation on the site was only partially enclosed by sound dampening barriers.

- f. Position all ancillary noise generation equipment away from the nearest critical receptors when feasible and install temporary sound enclosures, where possible on all noise generation equipment and operations.*

**Staff Comment: Not in compliance.** During the site visit on March 13, 2026, noise was noticed to have emanated from the workover rig performing an unspecified activity. The sound generated by this activity was audible in all directions. The soundmat installed along the west facing properties only partially covered the activity and south facing acoustical blankets were installed with gaps in between.

- g. Install vibration isolation pads on shaker units and provide low frequency designed sound absorption and barring panels adjacent to the shaker units.*

**Staff comment: Inconclusive.** There are no shaker units indicated on the plot plan that was submitted with the On-Site Safety Inspection Report dated February 2026. No issues relating to vibration originating from any shaker units were reported or observed.

- h. Implement Drill Site "quiet mode" operation procedures including limitation of material delivery schedules and other sound mitigation requirements.*

**Staff comment: Not in compliance.** Condition No. 6 imposes restrictions on hours of operation intended to minimize noise and disturbance during evening, nighttime, and early morning hours, when nearby receptors are most sensitive to the oil drill site's operational noise. The "Quiet Mode" provisions of Condition No. 6 serve a complementary purpose, requiring implementation of noise-reduction measures to minimize noise impacts during the hours when drilling operations are authorized to occur. Staff observations indicate that Condition No. 6's objective of reducing noise impacts on surrounding land uses may not be met. Reports of operations occurring during non-permitted hours are inconsistent with the condition's intent to limit nighttime and weekend noise. In addition, during a site visit conducted on March 13, 2026, staff observed that drilling activities generated elevated audible noise and that the temporary sound-dampening barriers only partially enclosed the work area. These observations indicate that the required "Quiet Mode" measures may not be fully implemented as intended, thereby reducing the effectiveness of the condition in minimizing noise impacts

- i. To ensure adequate sound mitigation has been installed, and to identify any unusual or unique noise problems, sound level measurement and testing shall be complete as the rig starts up operations. To verify and document sound level compliance, continuous sound level measurement and monitoring may be considered during all drilling, workover or maintenance activity to ensure adequate sound mitigation has been installed, and to identify any unusual or unique noise problems, sound level measurement and testing shall be complete as the rig starts up operations. To verify and document sound level compliance, continuous sound level measurement and monitoring shall be considered during all drilling, workover or maintenance activity. The operator shall make known through website communication the results of such measurement and monitoring.*

**Staff comment: Partial compliance.** As required, the operator has made noise monitoring reports available online through the Drill Site website. However, there are substantial issues with data accuracy, completeness and access. As a result, OZA staff cannot evaluate whether the noise monitoring conducted to date effectively meets the intent of the condition to verify sound level compliance and identify potential noise issues.

- There is no noise data from January 31, 2024 through September 23, 2024;
- The data collected from September 23, 2024 to present is incomplete. Review of the available data indicates that certain monitoring periods contain no recorded noise data from one sensor while another sensor recorded sound levels during the same period. This data gap occurs throughout multiple monitoring periods reviewed by OZA staff and raises questions

regarding the reliability of the monitoring data and whether the monitoring system is functioning as intended;

- Reports are not readily accessible to the public. The noise reports are only accessible through a hyperlink to a Portable Document Format (PDF) containing both noise and air monitoring data rather than being presented directly on the website, making them less readily accessible to members of the public and reducing the transparency of the monitoring results;
- Not all reporting periods are not accessible to the public, and thus unavailable for review, for example, reports dated 3.24.25 to 3.31.2025 and 11.17.25 to 11.24.25 are not accessible;
- Reports are missing data from critical periods of time. During the period from early March 2026 through early April 2026, multiple noise complaints were submitted regarding activity at the Drill Site; however, there are a number of sensor data sheets during this period that contain no recorded data, which limited OZA staff ability to evaluate whether noise levels were adequately captured during a period when noise complaints were reported.
- Reports and plans submitted to the OZA do not identify the locations of the noise monitoring sensors. While the sensors may be co-located with air monitoring equipment or part of an integrated monitoring system, the available documentation does not provide sufficient information for OZA staff to verify sensor placement or determine whether the monitoring locations are appropriate to capture representative noise levels.

8. *[Condition deleted in Case No. ZA-1959-15227-O-PA6]*

9. *All drilling, workover or maintenance rigs and equipment shall be removed from the premises immediately after drilling is completed, sump holes filled and derricks removed within sixty dates after the completion of the work.*

**Staff comment: In compliance.** No evidence has been submitted that equipment has remained for longer than 60 days.

10. *All oil drilling, production and maintenance operations shall be conducted in such a manner as to eliminate, as far as practicable, dust, noise, vibration and noxious odors and shall be in accordance with the best accepted practices incident to drilling for and production of oil, gas, and other hydrocarbon substances. Proven technological improvements in drilling, production and maintenance methods shall be adopted as they may become available, from time to time, if capable of reducing factors of nuisance and annoyance.*

**Staff Comment: Not in Compliance.** Condition No. 10 requires that all oil drilling, production, and maintenance operations be conducted in a manner that eliminates, as far as practicable, dust, noise, vibration, and noxious odors, and that operations conform to best accepted industry practices. The record demonstrates a recurring pattern of odor

impacts, nuisance complaints, regulatory violations, and potential operational deficiencies.

### **1. Odor and Air Quality Impacts**

The operation has generated recurring odor-related complaints and air quality violations affecting nearby residents and sensitive receptors.

The Southern California Air Quality Management District (SCAQMD) has issued multiple enforcement actions related to emissions, vapor leaks, odor events, and odor-control practices since the Zoning Administrator held the initial hearing for Case No. ZA-1959-15227-O-PA6, including but not limited to:

- Notice of Violation No. P78161 (January 15, 2025) for a vapor leak exceeding 50,000 ppm on a VOC component discovered during a District inspection. This excess, directly from the oil well, increases the risk for an explosion and direct harm to drill site staff, neighbors in the vicinity, and to the environment.
- Notice to Comply No. E61263 (August 14, 2024) for the use of spray as a neutralizing agent. This violation of state rules undermines regulatory compliance and risks the health of nearby residents. Neutralizing agents are banned at oil/gas well facilities due to health and environmental concerns. The use of neutralizing agents itself reveals the purpose of the operator attempting to mask significant odors at the drill site.
- Notice of Violation No. P74382 (March 17, 2023) for failure to properly maintain equipment in good operating condition. This NOV stemmed from SCAQMD inspectors' observation of a leak from a significantly large 10,500-gallon sized storage tank. The leak indicates a notable example of insufficient maintenance and effort to keep all equipment in safe operating conditions. The risk and potential catastrophe from a 10,500-gallon storage tank with hazardous materials (crude oil and produced water) represents a heightened risk for harm to drill site staff, local residents, and to the environment.
- Notice of Violation No. P73334 (May 3, 2022) for failure to control and capture fugitive gas emissions, impacting local air quality as well as increasing public health risks to local residents. This NOV also encompasses the operator's failure to vent low pressure storage tanks to the vapor recovery system, failure to comply with Rule 1148.1 (Oil and Gas Wells) requirements, and failure to report a breakdown which resulted in state regulatory standards violations. The operator's failure to follow state regulations concerning accurate gas emissions represents a risk to public and environmental health. The violation also reflects a failure to follow accepted oilfield practices in reporting the required gas emissions information in order to allow state air quality regulators to ascertain any appropriate compliance and/or enforcement measures.

In addition, on January 15, 2025, the California Air Resources Board (CARB) Methane Task Force documented a leak at Oil Well No. 5, API No. 0403700373

measuring 209,000 ppm on January 15, 2025, exceeding the applicable air emissions threshold of 50,000 ppm. This was associated with the same incident that resulted in SCAQMD's Notice of Violation No. P78161 on the same date.

Community complaints further demonstrate recurring odor impacts. From February 2024 to November 2025, SCAQMD has received 27 odor complaints associated with the site. Notably, 18 complaints were received during pipeline pressure-testing activities conducted on November 11, 2025.

The frequency of odor complaints, coupled with documented vapor leaks, methane releases, and regulatory enforcement actions, provide evidence supporting staff's preliminary assessment that site operations have not eliminated noxious odors to the extent practicable and have resulted in recurring nuisance impacts to nearby residents and other sensitive receptors.

## **2. Noise Impacts**

The record also reflects recurring community concerns regarding noise and other nuisance impacts associated with site operations.

In addition to community complaints regarding operational disturbances, the record contains evidence that site activities were conducted outside the hours authorized by Condition No. 6. Time-stamped videos submitted to the administrative record show work activities occurring on 67 separate occasions outside the permitted hours of operation. Condition No. 6 expressly limits work activities between 7:00 p.m. and 7:00 a.m. and on Sundays, except under limited circumstances. These restrictions are intended, in part, to minimize noise and other disturbances affecting nearby residents and sensitive land uses.

Condition No. 6 also requires implementation of "Quiet Mode" procedures during nighttime drilling operations, including restrictions on audible alarms, horns, employee communications, and other operational activities intended to reduce noise impacts. No evidence was provided demonstrating that after-hours activities were conducted in response to emergency circumstances or otherwise qualified for exemption from the condition's operational restrictions.

Further, the record indicates that heavy truck traffic associated with site operations generated concerns from community members. Condition No. 6 contains detailed requirements governing truck deliveries, staging, hours of operation, and advance notification to neighboring property owners for certain activity, reflecting the recognized potential for truck activity to create noise and nuisance impacts.

Community complaints received during the November 2025 pipeline pressure-testing activities also referenced operational disturbances, including heavy truck traffic and other activity-related impacts affecting nearby residents and sensitive land uses. In

addition to truck traffic noise complaints, the City received multiple complaints regarding noise associated with reported activity at the Drill Site in March 2026 and in April 2026. Field observations made during inspections on March 13, 2026 included similar observations of elevated noise from operational activity at the site.

The frequency and nature of these complaints provide evidence that site operations have generated nuisance impacts inconsistent with Condition No. 10 requiring operations to minimize noise and other disturbances to the maximum extent practicable.

### **3. Failure to Follow Best Practices and Regulatory Requirements**

In addition to the odor and nuisance impacts described above, the record demonstrates multiple instances in which the operator failed to adhere to accepted operational practices, permit requirements, and regulatory obligations intended to protect public health, safety, and welfare.

SCAQMD enforcement actions documented failures to maintain equipment in proper operating condition, failures to collect and control produced gas emissions, vapor leaks, and the prohibited use of spray as a neutralizing agent. These violations reflect deficiencies in operational controls, maintenance procedures, and emissions management expected under accepted industry standards.

SCAQMD also issued Notice of Violation No. P80684 on November 13, 2025, regarding equipment prohibited from operating within 1,000 feet of a K-12 school boundary. This violation raises concerns regarding potential risks to the surrounding community and compliance with regulatory requirements intended to protect sensitive receptors.

CalGEM has likewise documented compliance deficiencies at the site, including:

- Compliance I.D. 12281399 (September 8, 2022) for failure to conduct a required fluid level test on Well API No. 0403720955. The lack of required safety testing for idle wells raises potential risks due that may result in adverse impacts to the environment, drill site employees, and residents in the immediate vicinity.
- Compliance I.D. 12364552 (April 22, 2024) for unsuccessful well testing on Well API No. 0403720955. The well testing failure illustrates that the existing idle wells at the site may pose heightened risks due to the well's deficiencies. As a result, the well may pose heightened risks to drill site staff, to the environment, and to residents in the neighborhood.

Additional concerns were identified during the November 2025 pipeline pressure-testing activities. As summarized in the January 5, 2026 Note to File memorandum, the operator failed to notify their third-party pipeline testing contractor

of applicable Conditions of Approval encumbering the Drill Site operations. The contractor subsequently confirmed to OZA staff that it had not received the conditions governing the activity.

The memorandum further documented deficiencies in communication, coordination, and operational oversight, including concerns regarding the use of non-Tier 4 diesel equipment and potential violations of other Conditions of Approval. The operator's failure to ensure that contractors were informed of and complied with applicable requirements contributed to odor and noise complaints, regulatory enforcement actions, and community concerns associated with the testing activity.

While the cited SCAQMD and CalGEM violations have been resolved, the subsequent resolution of individual enforcement actions does not negate the underlying compliance concerns reflected in the record. Condition No. 10 requires that operations be conducted in a manner that eliminates nuisance impacts as far as practicable and in accordance with the best accepted practices incident to oil production. The repeated occurrence of equipment failures, vapor leaks, odor events, operational deficiencies, and regulatory enforcement actions demonstrates that nuisance conditions repeatedly arose during site operations before corrective measures were taken. This pattern is inconsistent with the operational standard established by Condition No. 10 and may indicate that measures to minimize nuisance impacts were not consistently implemented before those impacts occurred.

Taken together, the repeated violations, compliance deficiencies, operational failures, and documented community impacts occurring after the Zoning Administrator's consideration of the previous compliance record in Case No. ZA-1959-15227-O-PA6 demonstrate a continuing issues around compliance. Rather than isolated incidents, the record reflects recurring failures to implement and maintain practices necessary to minimize nuisance impacts, comply with regulatory requirements, and operate in accordance with the best accepted practices incident to oil production activities.

11. *The operator shall permanently post at all of the site's entry gates (including those facing West Adams Boulevard and West 27th Street), the direct telephone number to the supervisor of the site at that time for residents to call and report any ongoing problem or odors. A call log shall be maintained including date and time of call and subject, and date and time of response and action. Said log shall be made available at the request of the Office of Zoning Administration. Signage shall include instructions to call 911, the SCAQMD or the operator's hotline number in case of noxious odors caused by the operation. Signage shall also include the company's publicly available website where more information about activities are made available. Signage shall be translated and posted in the following languages that are the threshold languages, which are subject to change at any time, for a 1,500-foot radius of the Murphy Drill Site in Los Angeles County: English, Spanish, Korean, Simplified and Traditional Chinese, Arabic, Russian, Vietnamese, Tagalog.*

**Staff comment: In compliance.** Signs with the different required languages were observed at the vehicular entrances along Adams Boulevard and at the gate of the southern landscaped portion of the lot fronting 27th Street.

12. *The applicant shall conduct daily inspections of the premises, including the exterior of the concrete block wall and the open areas on the east side of the premises and the south side, facing 27th Street. All trash and debris shall be removed from the site daily.*

**Staff comment: Inconclusive.** No complaints regarding trash or debris have been received, and no debris or trash was observed during staff field visits or inspections. However, this condition also requires the applicant to conduct daily inspections of the premises. Staff has not received documentation demonstrating that the required daily inspections were conducted.

13. *All graffiti on the site shall be removed or painted over to match the color of the surface to which it is applied within 24 hours of its occurrence.*

**Staff comment: Partial compliance.** Photographs of graffiti at the site's entrance were submitted by community/stakeholders on July 15, 2024. Constituents shared photographs taken from April 29, 2024 and June 28, 2024 that illustrated the spray paint graffiti in this July correspondence submittal to the OZA. The operator removed the spray paint graffiti only after the issue was brought to the operator's attention during a meeting with OZA staff. The timing of graffiti removal was noted to have taken longer than 24 hours to remove. During the site visit on March 13, 2026, staff did not observe graffiti on the site.

14. *The authorized use shall be conducted at all times with due regard for the character of the surrounding district, and the right is reserved to the Zoning Administrator to impose additional corrective conditions, if, in the opinion of the Zoning Administrator, such conditions are proven necessary for the protection of persons in the neighborhood or occupants of adjacent property.*

**Staff comment: Zoning Administrator's discretion.**

15. *All lighting on the site shall be shielded and directed onto the site and no floodlighting shall be located so as to be seen directly from any adjacent residential area. Any new exterior lighting at the project site shall be located below the top of the surrounding containment structure and property line walls and shall be directed onto the site. Except as directed otherwise by the Office of Zoning Administration or other public agency, no lights shall be located on the enclosure structure above the height of the surrounding exterior and property line walls. These lights shall be placed and designed to minimize their impact on neighboring properties.*

**Staff comment: In compliance.** During the evening site visit on June 6, 2026, staff did not observe outdoor lighting (poles or mounted on walls or buildings directing lighting onto adjacent properties.)



Photo taken on June 6, 2026

16. *At any time during the period of validity of this grant, should documented evidence be submitted showing continued violation of any condition of this grant, resulting in an unreasonable level of disruption or interference with the peaceful enjoyment of the adjoining and neighboring properties, the Zoning Administrator reserves the right to require the applicant to review the applicant's compliance with and the effectiveness of these conditions.*

**Staff comment: Zoning Administrator's discretion.**

17. *As further required by Section 13.01-H and I or Section 12.23-C,4 of the Municipal Code, no maintenance shall be performed unless a determination has been made by the Zoning Administrator.*

**Staff Comment: In compliance.**

Ordinance No. 187,709, which added restrictions on maintenance activities to LAMC

Section 12.23-C,4, was rescinded by the City Council following its January 2023 adoption and is no longer in effect. Accordingly, the maintenance restrictions formerly contained in that ordinance under LAMC Section 12.23-C,4 are not applicable.

Pursuant to Case No. ZA-2025-2976-ZAI-1A (Zoning Administrator's Interpretation on Well Maintenance) and the established practice of the Office of Zoning Administration, the term "maintenance" as referenced in LAMC Sections 13.01-H and 13.01-I is interpreted to include activities that trigger a California Geologic Energy Management Division (CalGEM) Rework Permit and/or notification requirements under South Coast Air Quality Management District (SCAQMD) Rule 1148.2 for well rework or injection activities. Such activities include, but are not limited to, acidizing, hydraulic fracturing, gravel packing, maintenance acidizing, matrix acidizing, and acid fracturing.

Although E&B Natural Resources submitted SCAQMD Rule 1148.2 notifications for maintenance acidizing activities in or around April and May 2025, the operator subsequently extended the proposed project start dates on multiple occasions and ultimately did not perform the work. During meetings with Office of Zoning Administration staff regarding condition compliance in 2025, E&B Natural Resources confirmed that the maintenance acidizing activities were never conducted.

Furthermore, the operator has not indicated an intent to undertake any other activities that would constitute "maintenance". Therefore, no maintenance activities requiring a determination by the Zoning Administrator have occurred, and the subject condition remains in compliance.

18. *An Annual On-site Safety Inspection Report shall be performed by the applicant/operator and sent to the Petroleum Administrator and the Office of Zoning Administration, listing the inventory of equipment on site, any repair work, and / or maintenance done to keep the equipment in good operating condition at all times and any safety protocols of the responsible State, regional and City agencies. The first Annual Safety Inspection report shall be submitted within 45 days of the effective date of this action. All Annual Reports shall include a technology assessment report. The assessment report shall be collaboratively generated by the operator with input from environmental and petroleum engineering consultants and community stakeholders to identify better operating technologies, such as electric workover rigs.*

**Staff Comment: Not in compliance.** The operator has submitted all required Annual On-site Safety Inspection Reports to the OZA and Petroleum Administrator in a timely manner following the January 31, 2024 South Los Angeles Area Planning Commission determination. However, compliance with Condition No. 18 is not limited to the timely submission of annual reports; the reports must contain sufficient information to allow OZA staff to evaluate the safety, effectiveness, and regulatory compliance of drill site operations and must include a technology assessment report developed with input from environmental and petroleum engineering consultants and community stakeholders.

While the annual reports generally identify each applicable condition of approval and conclude that the site is "in compliance," they provide little or no supporting information, analysis, documentation, or technology assessment necessary to substantiate those

conclusions. As submitted, the reports do not provide an adequate basis for OZA staff to evaluate whether the operational, safety, and land use conditions required under Case No. ZA-1959-15527-O-PA6-1A are being implemented as intended. The reports largely consist of conclusory statements of compliance without meaningful explanation regarding how compliance determinations were reached or how the conditions are being implemented in practice. Based on staff's assessment, the reports do not appear to substantiate their conclusions with adequate evidence, do not sufficiently address the governing city/state requirements, and omit key information necessary for a complete evaluation. These discrepancies have resulted in the OZA having to independently follow up with regulatory agencies and research additional information related to the operator's compliance.

Since 2024, OZA has made repeated efforts to obtain clarification regarding information contained in the annual reports through written correspondence and meetings with the operator. Topics for which OZA has repeatedly sought clarification include, but are not limited to: operations occurring outside approved hours of operation; microturbine usage; the status of idle wells and compliance with applicable idle well regulations; installation of fenceline air monitoring consistent with the Zoning Administrator's intent in imposing that condition; public transparency regarding activities occurring at the drill site; notices of violation issued by regulatory agencies; and the status of a required enclosure. These matters are directly related to conditions imposed under Case No. ZA-1959-15527-O-PA6-1A to mitigate impacts on surrounding land uses and protect public health and safety.

Following the operator's annual report submittal on March 13, 2025, OZA staff arranged two meetings with the operator on May 19, 2025 and June 2, 2025 to discuss incomplete and partial information contained in the report and to request supporting documentation. The requested information was not sufficiently provided. OZA thereafter issued a Letter of Communication dated September 2, 2025 formally requesting the outstanding information and documentation necessary to evaluate compliance with the Conditions of Approval. Despite these repeated efforts, significant questions regarding compliance with multiple conditions remain unresolved.

The operator has also not provided sufficient information for OZA to evaluate compliance with the stakeholder engagement component of Condition No. 18. The condition expressly requires that the technology assessment report be collaboratively generated with input from environmental and petroleum engineering consultants and community stakeholders. The reports do contain a technology assessment component. However, the annual reports do not describe the outreach undertaken to obtain stakeholder input, identify the stakeholders consulted, summarize comments received, or explain how stakeholder feedback was included in the assessment. To date, the operator has not provided documentation demonstrating how community stakeholder input was solicited, considered and incorporated into the required technology assessment process.

The absence of supporting documentation is particularly relevant given that community stakeholders continue to express concerns regarding site operations and the adequacy of the operator's assessment reports. For example, in a June 1, 2026 letter regarding the operator's March 11, 2026 Third-Party Audit of the Murphy Production Site, Redeemer Community Partnership stated that the audit failed to provide the transparency and accountability envisioned by the Conditions of Approval and did not adequately address ongoing nuisance conditions affecting public health and safety. The absence of stakeholder engagement does not meet the requirements of this condition, and it may have also affected the completeness and reliability of the technology assessment itself by limiting the operator's consideration of available technologies and technical expertise.

Stakeholder input on the technology assessment is intended to help ameliorate the surrounding community's concerns, and provide dialogue between the operator and affected parties around the usage of equipment and technology that can help lessen impacts on the surrounding neighborhood and environment. For example, stakeholder input from concerned citizens and interested parties in the neighborhood may have shared with the operator the existing all-electric workover rig technology that exists in different states in the country. The operator's technology assessment in both the 2024 and 2025 submittals claimed that the technology was not available -- in contrast to what the OZA later provided to the operator in a September 2025 Letter of Communication. This example illustrates how stakeholder engagement could have contributed additional information for consideration in the technology assessment, resulting in a more complete and robust analysis.

Similarly, expert testimony from university-affiliated research centers identifying deficiencies in existing air monitoring systems and opportunities to improve monitoring accuracy (see further discussion under Condition No. 19 below) further supports stakeholder engagement in the technology assessment process. Such technical input can help ensure that available and emerging air monitoring technologies are fully considered and that technology assessments are informed by the best available scientific and technical information.

Given the continued submission of annual reports that provide conclusory statements of compliance without adequate supporting information, the operator's failure to provide requested follow-up documentation, the persistence of unresolved questions regarding compliance with multiple Conditions of Approval, and the absence of documentation substantiating stakeholder engagement, the staff preliminarily assesses that the operator does not meet the requirements of Condition No. 18.

19. *Within 90 days of the effective date of this action, the applicant shall install a fence line air monitoring system which presents real-time air monitoring data, along the fence line between the oil drilling and production facility and the community. The system shall be designed and installed to provide, as feasible, real time data on-line via a website and provide quarterly reports to the SCAQMD, the Petroleum Administrator and the Office of Zoning Administration for up to three years from the effective date of this action. Monthly*

*reports shall also be submitted to the Office of Zoning Administration via e-mail to [planning.oildrilling@lacity.org](mailto:planning.oildrilling@lacity.org). The fence line air monitoring system shall be designed to the satisfaction of the Petroleum Administrator and submitted to the Department of City Planning for inclusion in the case file prior to the upgrade of the existing fenceline monitoring system. The monitoring equipment shall continuously measure reactive organic compounds, hydrogen sulfide, and sulfur dioxide at the facility fence line.*

**Staff comment: Partial compliance.** The operator has installed an air quality monitoring system at the facility, but is only in partial compliance with Condition No. 19 for at least three reasons: i) the operator has failed to respond to the OZA concerning the functionality of providing real-time air quality monitoring, ii) the existing air quality monitoring may not be effective, given expert testimony submitted to the OZA and other evidence in the administrative record, and iii) the fenceline monitoring system has not been approved to the satisfaction of the City's Petroleum Administrator.

Air emission reports are hyperlinked on the Murphy Oil Drill website for the following compounds: hydrogen sulfide, sulfur dioxide, volatile organic compounds, and Class II sound intensity from various sensors; however, the data is not real-time (current). The intention behind Condition No. 19 was to have a portal or landing page with a format that made it easily accessible to see trends in air quality. Real-time monitoring with a publicly accessible webpage (or dashboard portal) can help drill site staff, local constituents, and government agencies identify potential risks. A public portal that illustrates real-time monitoring can also help corroborate odor complaints from neighbors in a timely fashion versus waiting extended periods of time for the operator's static measurements. In that scenario, potential risks and hazards can be addressed and mitigated in order to minimize potential harm to local residents and to the environment. The operator's practice of submitting static measurements in PDF format for given weeks at a time is an uncommon method to present monitoring results in comparison to how educational institutions, research centers, state agencies, and even other petroleum facilities in the City operate. Real-time monitoring, or near real-time monitoring is a commercially available and technologically feasible practice for many industrial facilities, including refineries. In contrast, and as an example, when OZA staff accessed the posted reports on June 24, 2026, the most recent records available covered only the period from June 8, 2026 to June 15, 2026. In addition, OZA staff explained to E&B Natural Resources in a May 19, 2025 meeting that the intention for Condition No. 19 was to have a real-time fenceline air monitoring system that resembles existing fenceline monitoring systems utilized by various entities. OZA staff verbally explained and then sent in email correspondence clear examples of real-time monitoring systems such as PurpleAir sensors, fenceline monitoring pages operated by petroleum facilities in Wilmington, educational institutions, and even the South Coast Air Quality Management District. These examples, along with hyperlinks to the various real-time monitoring pages, were sent to the operator in an email correspondence dated June 3, 2025 and in a Letter of Communication dated September 2, 2025.

In addition, a review of the air monitoring reports posted by the operator reveals significant inconsistencies within the facility's air monitoring system. The reports contain frequent data gaps where an individual air sensor failed to log chemical concentrations for a compound while an alternate sensor recorded concentrations for the same compound over the same time period. These gaps in the data appear across multiple air monitoring reports, and call into question the function and reliability of the air monitoring system as a whole to correctly or accurately record air quality conditions at the site. Consequently, the missing data calls into question the overall credibility of the facility's reported environmental impact.

This discussion is important because it provided the operator evidence that a more robust, accurate, and transparent monitoring system was commercially feasible, particularly in Los Angeles County. The operator failed to provide additional information surrounding the existing fenceline monitoring system and how it could resemble the examples referenced by OZA staff in the May 19, 2025 meeting and in email correspondence to the operator. The OZA further inquired about the monitoring system in a September 2, 2025 Letter of Communication and the operator explained in a response dated November 25, 2025 that it was working with their monitoring contractor to change the format, but there have been no updates to-date. The lack of documented progress or follow-through about the requested changes indicate that compliance with Condition No. 19 has not yet been fully demonstrated.

The second reason for partial compliance centers on the efficiency and accuracy of said monitoring system. Given the static measurements provided to the Zoning Administrator and to the Petroleum Administrator weeks after said measurements were taken at the facility, there are concerns that the operator has not integrated industry best practices that feature real-time monitoring in order to quickly capture elevated measurements of pollution. Two experts affiliated with university research centers submitted separate letters of testimony to the administrative record highlighting the deficiencies and areas of improvement for a more accurate monitoring system. These letters raise concerns about the existing monitoring system and provide feedback for the operator to upgrade their system as soon as possible for the purpose of the community's health and safety. These letters include correspondence dated May 28, 2025 and submitted by Dr. Caroline Frischmon of the University of Colorado-Boulder's Hannigan Air Quality Lab research center as well as a letter dated February 9, 2026 and submitted by Dr. Jill Johnston of the Department of Environmental and Occupational Health at the University of California-Irvine. The February 9, 2026 letter – also signed by Dr. Caroline Frischmon and Dr. Michael Hannigan, also affiliated with the Hannigan Air Quality Lab research center – raises concerns regarding the measurement thresholds of sulfur dioxide, hydrogen sulfide, volatile organic compounds, as well as the location of the sensors, and the adequacy of resident notifications. Both letters also recommend monitoring and reporting particulate matter (PM<sub>2.5</sub>), quantifying methane emissions, and providing public notification. The letter from Dr. Johnston recommends that the operator report when operational shutdowns or equipment malfunctions occur. The letter further alleges

that the observations and examples documented by the operator's monitoring contractor are inaccurate and that the reported air emissions data disclosed to the public may pose a threat to public health and safety. The letter also notes that between August 18, 2024 and August 23, 2024, the operator reported sulfur dioxide concentrations exceeding 0.075 parts per million. According to Dr. Johnston, "...the pattern of sustained and episodic elevations raise significant air quality and public health concerns for this community. SO<sub>2</sub> (sulfur dioxide) is a respiratory irritant that can worsen asthma and other chronic pulmonary diseases." The letter explains that a sensor should be located northeast of the facility to capture downwind concentrations, given the prevailing winds typically originate from the west and southwest. As a result, this merits greater investigation during these nuisance abatement/revocation proceedings. The purpose of citing these letters is not to determine whether the experts' conclusions or recommendations are correct. Rather, they illustrate the type of technical input that stakeholder engagement under Condition No. 18 is intended to elicit so that technology assessments are informed by relevant scientific expertise and available information.

Lastly, the operator has not provided evidence demonstrating that the existing fenceline air monitoring system has been designed and installed to the satisfaction of the City's Petroleum Administrator, as required by the condition. The operator submitted materials regarding the monitoring system to the City's Petroleum Administrator for review; however, the administrative record does not contain documentation reflecting the Petroleum Administrator's determination regarding the system. Accordingly, OZA cannot verify, based on the information submitted to date, that this component of the condition has been satisfied.

20. *The applicant shall immediately notify the Los Angeles Fire Department, the Petroleum Administrator, the Office of Zoning Administration, the Department of Building and Safety and the local City Council office of an emergency, any incident, and/or spill that requires reporting to any State, County, or regional agency. In addition, the operator shall notify the Office of Zoning Administration's Oil Drilling Unit via email to [Planning.oildrilling@lacity.org](mailto:Planning.oildrilling@lacity.org) within 24 hours whenever there is an emergency event that includes, but is not limited to: 911 calls for emergency services or CalOES hazardous event notifications. Operator staff can email [planning.oildrilling@lacity.org](mailto:planning.oildrilling@lacity.org) for notifications.*

**Staff comment: In compliance.** No reports of oil spills nor any other emergency incident that required notification to the Los Angeles Fire Department, the Petroleum Administrator, the OZA, the Department of Building and Safety and the local City Council office of an emergency.

21. *The applicant shall create a landing page for the public on the company website with information on monthly reporting on noise and emission levels at the drill site, current and planned operations, emergency contact information, emergency reporting instructions, and, as feasible, real time fence line air monitoring data. The operator shall*

*have this website completed and in operation within six calendar months of the effective date of this action and provide the website address information to Planning.oildrilling@lacity.org to be included in the administrative record. This information shall be posted on the website in the following languages that are the threshold languages, which are subject to change at any time, for a 1,500-foot radius of the Murphy Drill Site in Los Angeles County: English, Spanish, Korean, Simplified and Traditional Chinese, Arabic, Russian, Vietnamese, Tagalog.*

**Staff Comment: Partial compliance.** The operator established a public landing page within the required timeframe; however, the website does not appear to fully satisfy the intent or specific requirements of this condition.

The condition requires the landing page to provide readily accessible information regarding current and planned operations, monthly noise and emissions reporting, emergency contact information, emergency reporting instructions, and, where feasible, real-time fenceline air monitoring data. While the website includes certain required information, significant deficiencies remain.

The information required by this condition is not prominently displayed on the landing page. Instead, the webpage primarily features general background and informational content regarding the operator, while required operational information is either omitted or located within hyperlinks to technical reports that are not readily apparent or easily navigable by members of the public. Rather than presenting the required information directly on the landing page, the operator appears to rely on external reports and supporting documents to convey much of the information required by this condition. This organization potentially diminishes the transparency and public accessibility intended by the condition.

The website includes links to emissions monitoring reports, noise monitoring reports, and provides an email contact for the operator. However, the monitoring reports are not prominently displayed on the landing page and are instead accessible through hyperlinks to technical reports, which reduces the accessibility and transparency of the information for members of the public. In addition, the air monitoring information provided on the website is not presented in a real-time format. Although the condition provides that real-time fenceline air monitoring data shall be provided where feasible, OZA staff previously provided the operator with examples of publicly accessible real-time monitoring platforms demonstrating available approaches for implementing such systems. Despite this information, the operator has not incorporated a real-time monitoring format into the public landing page. Emergency reporting instructions are also not provided directly on the website. Further discussion regarding the adequacy and effectiveness of the noise and air monitoring data is provided under Conditions No. 7 and No. 19, respectively.

Furthermore, the landing page did not directly identify several significant operational activities that occurred at the Drill Site, including the hydrostatic pipeline pressure testing conducted in November 2025 and the temporary workover rig activities conducted in March 2026. Both activities generated substantial community concerns regarding operational impacts. The omission of these activities from the landing page undermines the transparency and public notification purpose of this condition.

The condition requires the website to identify current and planned operations. Although the condition does not require publication of the Drill Site's annual reporting, the operator appears to rely on the 2025 Annual Report to provide much of the information required by this condition. The 2025 Annual Report is accessible only through a hyperlink near the bottom of the webpage and references the planned hydrostatic pipeline pressure testing for a nine-mile pipeline segment. However, this information is not presented directly on the landing page as required. Moreover, the linked document is not the operator's most recent annual report, as the 2026 Annual Report has since been issued. Further, the hyperlink to the 2025 annual report only displays the appendices listing permits, certifications and other similar documentation. The entire annual report is available for the public for public review. Information contained within linked reports, particularly reports that are not current or complete, is not an adequate substitute for clear and readily accessible information on the landing page itself.

The condition further requires that the landing page be provided in the applicable threshold languages for the surrounding community. As of the date of this report, the required information has not been translated into the required threshold languages.

Finally, the Office of Zoning Administration provided the operator with multiple opportunities to revise the landing page and improve its content to satisfy both the specific requirements and the intended purpose of this condition. Despite this feedback, the deficiencies identified above remain.

22. *The operator shall use the landing page on their website in order to notify the public when permitted and approved drilling, redrilling, deepening, plugging and abandonment and well maintenance activities will commence for any well(s) at the drill site. Notification shall be provided at least one calendar week prior to the anticipated start date of the project. This information shall be posted in languages that are the threshold languages for Los Angeles County, which are subject to change at any time. The following threshold languages found within a 1,500-foot radius of the Murphy Drill Site are the following: English, Spanish, Korean, Chinese (Simplified and Traditional), Arabic, Russian, Vietnamese, and Tagalog.*

**Staff comment: Not Applicable.** There are no current permit requests in CalGEM or SCAMD requesting drilling, redrilling, deepening, plugging and abandonment, or Well Maintenance (as interpreted in Case No. ZA-2025-2976-ZAI-1A) on the site that would necessitate public noticing pursuant to this condition, nor have any of the

above-mentioned activities been executed since the South Los Angeles Area Planning Commission's January 31, 2024 imposition of this condition.

23. *Within 24 months of the effective date of this Case No. ZA-1959-15227-O-PA6-1A determination, completion of all required work shall be verified during the final inspection of the building permit and the building permit shall be finalized for a structure to be a minimum of 30 feet in height to a maximum of 45 feet in height that will enclose the oil production area of the site on all four sides. The structure shall be open to the sky with no roof. No oil, gas or other hydrocarbon substances may be produced from any well hereby permitted unless all equipment necessarily incident to such production is enclosed within the up to 45-foot in height structure. Plans for said enclosure need to be submitted to the Department of Building and Safety for all necessary reviews, including reviews by other departments, agencies, as appropriate, and building permits secured prior to any construction. This structure, for the oil production area, shall be of a permanent type, of attractive design and constructed in a manner that will minimize, as far as practicable, dust, noise, noxious odors and vibrations or other conditions which are offensive to the senses, and shall be equipped with such devices as are necessary to minimize the objectionable features mentioned above. The architectural treatment of the exterior of such structure shall be subject to issuance of a Certificate of Compatibility with the approval of the Director of Planning, or their designee, after a maximum of two hearings by the Jefferson Park Historic Preservation Overlay Zone's Historic Preservation Board (Jefferson Park HPOZ Board).*

*If causes beyond the reasonable control of the operator, including, but not limited to, permitting delays, litigation, and administrative proceedings against the determination, the operator shall submit in writing a request to the Zoning Administrator with evidence of their good faith effort to complete the required work within a 24-month timeframe. It is at the Zoning Administrator's discretion to allow any extensions beyond 24 months. See Exhibit B for the area that shall be enclosed on all four sides. This area includes, but is not limited to: the well cellar, storage tanks, slop tank, compressors, and the microturbines.*

**Staff Comment: Not in Compliance.** The operator has not finalized its building permit, nor has a final inspection of the structure occurred, as required by Condition No. 23. The purpose of Condition No. 23 was to reduce noise and air quality impacts on nearby residents through the construction of an enclosure structure.

The operator did not pursue the approvals necessary in a timely manner to comply with the condition. Although the South Los Angeles Area Planning Commission issued a determination on January 31, 2024, the operator did not request the Office of Historic Resources Jefferson Park staff contact until approximately 18 months later. On October 1, 2025, Jefferson Park Historic Preservation Overlay Zone (HPOZ) staff confirmed they had not received project plans or a request from E&B Natural Resources to present the project to the HPOZ Board.

To facilitate compliance, OZA staff monitored the permitting process and provided the operator with the Office of Historic Resources' contact information. Despite these efforts, the operator did not submit plans to the Los Angeles Department of Building and Safety or initiate HPOZ review until December 2025, approximately two months before the compliance deadline. On December 3, 2025, the operator requested an extension from the OZA; however, the request was not accompanied by evidence demonstrating substantial progress toward compliance, such as a plan check submittal to LADBS or a determination letter from the Jefferson Park HPOZ. While extensions may be considered where an operator demonstrates a good-faith effort to comply with prescribed timelines, the record does not indicate such efforts in this case. The operator had more than two years to advance the project through the required review and permitting processes, yet did not initiate HPOZ review until shortly before the deadline and had not submitted plans to LADBS for review.

This conclusion is consistent with statements made by the Zoning Administrator during the October 17, 2023 hearing before the South Los Angeles Area Planning Commission regarding the intent and implementation of Condition No. 23. At that hearing, the Zoning Administrator explained that although additional time could be granted to complete construction of the structure, a last-minute extension request unsupported by demonstrable progress toward compliance would likely constitute a violation of the condition. Given the operator's limited actions during the compliance period and the absence of meaningful progress toward obtaining the necessary approvals and permits, the operator has not demonstrated compliance with Condition No. 23 or a sustained effort to fulfill its requirements.

On July 7, 2026, the operator submitted construction documents to the Department of Building and Safety for a sound wall surrounding the oil production area under Permit No. 26020-10000-01364. The timing of this submittal, occurring after the OZA initiated a nuisance abatement/revocation case which includes an evaluation of the imposed conditions of approval, raises concerns regarding the operator's diligence in complying with Condition No. 23. The delayed action also calls into question the operator's efforts to fulfill the underlying purpose of the condition, which is to mitigate noise and air quality impacts affecting residents in the vicinity of the facility. The production area structure was required to have been completed by January 31, 2026.

Although the operator submitted a written request for an extension on December 3, 2025, Condition No. 23 provides that any extension is discretionary and must be supported by evidence of the operator's good-faith effort to complete the required work within the prescribed timeframe. As discussed above, the request was not accompanied by evidence demonstrating substantial progress toward obtaining the required approvals or permits. Moreover, the operator's July 7, 2026 submittal to the Department of Building and Safety occurred more than five months after the January 31, 2026 compliance deadline and after initiation of this nuisance abatement/revocation proceeding. While the post-deadline permit application demonstrates that the operator was ultimately able to initiate the building permit process, it does not establish timely compliance with Condition

No. 23 or demonstrate the sustained diligence and good-faith effort contemplated by the condition throughout the 24-month compliance period. Accordingly, the operator has not demonstrated compliance with Condition No. 23.

- a. *Tanks and other equipment and buildings used in extraction and production activities shall be maintained on the site in such a manner that no portion of the tanks, equipment or buildings other than the upper portion of the rig shall extend above the height of the up to 45-foot permanent enclosure. In addition, no portions of the draw-works house, drilling equipment buildings, temporary mud and water storage tanks and future portable drilling mast used for servicing activities shall extend above the height of the up to 45-foot permanent enclosure.*

**Staff comment: Inconclusive.** During the site visit on March 13, 2026, staff observed an approximately 60-foot high workover rig on-site, but were unable to determine the activities being conducted because they did not have access to the drill site.



Photo taken on March 13, 2026 showing workover rig

- b. In addition, the workover, maintenance or drilling rigs that measure up to a height of 45 feet and the micro-turbines shall be within the up to 45-foot in height structure.*

**Staff comment: Inconclusive.** The plans submitted to the OZA and the plans approved by staff assigned to the Jefferson Park HPOZ dated March 11, 2026 do not show production equipment on the site to exceed the 45-foot height limit indicated in this condition. However, the structure intended to enclose the workover, maintenance, or drilling rigs and micro-turbines has not yet been completed. Because the condition requires such equipment to be located within the structure, staff cannot verify compliance with this requirement at this time. Compliance can be determined upon

completion of the structure and verification that the equipment is enclosed in accordance with the approved plans.

- c. *An enhanced vapor recovery system shall be attached to equipment such as the stock tanks, clarifiers, and other aboveground storage tanks in the oil production area. The vapor recovery recordings or report shall be submitted to the Office of Zoning Administration (via email to [planning.oildrilling@lacity.org](mailto:planning.oildrilling@lacity.org)), the Petroleum Administrator, the State Fire Marshal, the California State Resources Board and the South Coast Air Quality Management District as required pursuant to city, county, state, and federal rules and regulations.*

**Staff comment: Inconclusive.** The Third-Party Audit of the Murphy Production Site submitted in March 2025 identifies vapor recovery line tanks (Items 97 and 98), a water clarifier, and stock tanks in the Pipeline Management Plan. The plot plan included with the report also appears to depict components of a vapor recovery system, including a vapor compressor and scrubbers. However, neither the March 2025 audit nor the more recent 2026 Third-Party Audit of the Drill Site explicitly states whether an enhanced vapor recovery system has been installed at the site. Additionally, staff were unable to verify the presence of a vapor recovery system during site visits. To date, no vapor recovery records or reports have been submitted to OZA, and OZA has likewise been unable to verify whether such documentation was provided to the applicable agencies identified in this condition.

- d. *It is the applicant's responsibility to act in a timely manner to submit a building permit application and comply with all rules and requirements in order to secure and final the building permit for the up to 45-foot in height structure. It is also the applicant's responsibility to act in a timely manner to apply for and obtain a Certificate of Compatibility from the Jefferson Park HPOZ Board.*

**Staff comment: Not in compliance.** As discussed in the staff analysis for Condition No. 23, the operator did not timely pursue the approvals required under this subcondition of Condition No. 23, including the building permit and Certificate of Compatibility.

24. *A Spill Prevention, Control and Countermeasure (SPCC) Plan shall be submitted via email to [planning.oildrilling@lacity.org](mailto:planning.oildrilling@lacity.org), annually. If any amendments are to be made, the operator shall submit the updated SPCC within six months of any new amendment(s). The updated document shall be submitted to the file to the satisfaction of the Bureau of Sanitation Watershed Protection Division, the Petroleum Administrator and the Office of Zoning Administration. This review shall include at a minimum, the following:*

1. *Applicability of new prevention and control technology, which may significantly reduce the likelihood of a spill event from the Facility if such technology has been field proven at the time of the review;*

2. *Accuracy of the SPCC Plan as compared to the current facility operation and SPCC Regulations;*
3. *Capacity and structural integrity of secondary containment structures; and*
4. *SPCC inspections and records retention to ensure continuity for a minimum period of three Years.*
5. *The site shall be staffed 24 hours a day, seven days a week. There shall be a minimum of two operators per shift so that meal and other breaks do not result in the site being unoccupied by staff.*
6. *The dispersal system for any required odor control product shall be placed as far as practicable from any adjacent residential structures to the site. The current location of the system shall be moved to a more remote location in the drill site, but away from any open flames or ignition sources.*

**Staff comment: Partial Compliance.** The operator is in partial compliance for a variety of reasons. While the operator has consistently included a copy of the Spill Prevention, Control, and Countermeasures (SPCC) Plan with the Annual Safety Inspection Report submittals, the SPCC document itself includes deficiencies. The SPCC fails to make any references to the ZA requirement for 24/7 employee coverage at the Drill Site. This is a required component in Condition No. 24 and the operator has failed to include this provision or demonstrate compliance with it since the Area Planning Commission determination ZA-1959-15227-O-PA6-1A dated January 31, 2024..

In a letter dated September 2, 2025, the OZA outlined several questions and concerns to the operator with the SPCC included in the operator's 2025 submittal of the Annual Safety Inspection Report. The OZA requested a response and clarification regarding three concerns regarding the SPCC (See Page 4, Letter of Communication dated 9/5/2025). One of those concerns included a revision to the SPCC to reflect the 24/7 employee coverage requirement in the SPCC. The operator affirmatively declined to include the 24/7 employee coverage into the SPCC in a response to the OZA dated November 24, 2025. The operator acknowledged the OZA's request and declined to make this required revision. Failure and refusal to comply with item 5 of this condition renders staff's preliminary assessment of compliance with this condition as "Partial Compliance."

25. *All drilling, workover, or maintenance rig operations at the site shall at all times be carried out with engines that are certified pursuant to the Environmental Protection Agency's Tier 4 Emissions Standards until electric workover rigs shall become commercially available for lease or purchase. Power may be generated on site by solar voltaic generates or natural gas powered microturbines placed within sound proofed and odor proofed buildings or structures. Refined natural gas from utility sources may be*

*imported to power microturbines, but shall not be the primary source of microturbines energy cogeneration. Natural gas, produced as a byproduct from oil extraction, shall be the primary source for microturbines energy cogeneration.*

*All drilling, workover, or maintenance rig operations at the site shall at all times be carried on only by engines that are certified pursuant to the U.S. Environmental Protection Agency's (USEPA) Tier 4 Final emissions standards, or, if available, diesel engines with a higher emissions standard than Tier 4 Final, until electric powered workover rigs shall become commercially available for lease or purchase. Power may be generated on site by solar voltaic generators or natural gas powered micro-turbines placed within sound and odor proofed buildings or structures. Any methane used for the micro-turbines must come from methane produced as a byproduct from oil extraction. Refined natural gas may be imported to power microturbines from utility sources, but shall not be the primary source of microturbines energy cogeneration.*

**Staff comment: Partial compliance.** In a March 26, 2026 email correspondence, the operator provided the OZA information showing that the workover rig used in recent well servicing operations was equipped with a Tier 4 Final diesel engine, as required by Condition No. 25. The operator, however, has not yet secured electric workover rig operations despite the technology now being both feasible and available in the United States and in California. In May and June 2025 meetings between the OZA and the operator, representatives of E&B Natural Resources shared with OZA staff that electric workover rigs would not be available anytime in the short-term future because they were, as the operator stated, not technologically feasible and not available in the United States. However, in a Letter of Communication dated September 2, 2025, the OZA outlined to the operator examples of numerous electric-powered workover rigs in active operation in the United States, including Texas and California. The operator's response to this evidence, dated November 24, 2025, confirmed the existence and operation of commercially available electric workover rigs and that the operator would seek additional information. The operator's 2026 submittal of the Annual Safety Inspection Report includes a memorandum from an engineering firm, SCS Engineers, Inc. This memorandum, dated March 2, 2026, concluded that the operator would not be able to secure an electric workover rig due to reasons such as: "Would require utility interconnection, permitting, and long-term contractual commitment...Existing units would require a large capital investment to convert and permit per California regulatory standards." These operational and business considerations do not relieve the operator of their obligation to comply with the condition. It remains technologically feasible and commercially available – thresholds that were discussed at the South Los Angeles Area Planning Commission meeting on October 17, 2023. The operator's representative, at that meeting, objected to this provision of Condition No. 25 because electric workover rigs were not technologically feasible and commercially available in the United States, and the Area Planning Commission modified the condition as such in recognition of those limitations at the time. However, now that there are two U.S. states, at minimum, where electric workover rigs are available and operating, the operator raises new

objections not previously raised at the appeal meeting in October 2023. The operator has affirmatively concluded that they will not be pursuing all available options, investments, and logistics to secure either a purchase or leasing of an electric workover rig and thus, are not meeting this provision of Condition No. 25.

There is also the issue of the operator's usage of natural gas-powered microturbines and whether the operator is indeed using the natural gas byproduct from extraction activities as the main source for microturbine energy cogeneration as specified by this condition. This condition requires that all natural-gas microturbines are powered primarily by the excess natural gas that is extracted as a byproduct of the crude oil extraction at the facility. The purpose of this condition is to ensure that the microturbines primarily burn natural gas from extraction operations and not from refined gas purchased by SoCalGas. The operator provided in an email correspondence (dated November 24, 2025) that the gas energy source split is 72% oil extraction byproduct and 22% SoCalGas refined product. LADBS records show that the operator has applied for a new microturbine unit for installation at the Drill Site despite CalGEM sourced production data indicating that gas byproduct has been on a steep decline at the Drill Site in recent years. However, the operator's April 2026 electrical plan check submittal for a new microturbine unit contradicts CalGEM natural gas production data that additional microturbines are needed to process oil well byproduct natural gas. To note, the operator did not notify the OZA of this application or request the OZA verify if installation of a new microturbine unit would allow the operator to remain in compliance with the Conditions of Approval for Case No. ZA-1959-15227-O-PA6-1A. On April 20 and 21, 2026 LADBS Electrical Plan Check staff confirmed, via email correspondence, to the OZA that they had instructed the applicant (E&B Natural Resources) to submit plans and notification to the OZA concerning this electrical permit application. The LADBS staff confirmed to the OZA that they had updated the electrical plan correction list, intended for the operator, with direction to contact the OZA about the proposed scope of work. The operator failed to contact the OZA and the electrical permit was issued on June 9, 2026. In an email dated June 23, 2026, SCAQMD staff confirmed that there were no pending applications for new microturbine unit(s) for the Drill Site facility. This is an important detail to highlight as all microturbine units require registration or potentially a permit from SCAQMD. It may be possible that the operator is installing a microturbine unit without having secured the proper review and approval from SCAQMD, and this matter warrants further investigation.

The operator's intention to have more capacity to burn natural gas may be an indication that the operator is attempting to redirect more SoCalGas refined product rather than relying almost exclusively on the oil well byproduct gas.

26. *The use of diesel fueled equipment, including any drilling, workover or maintenance rig, is permitted on the site as long as the equipment is equipped with engines that are certified pursuant to the U.S. Environmental Protection Agency's (USEPA) Tier 4 Final emissions standards or, if available, diesel engines with a higher emissions standard*

*than Tier 4 Final, until electric workover rigs shall become commercially available for lease or purchase. Diesel powered vehicles are permitted on the site. Said vehicles, however, may not idle when on-site and must shut off their engines until they are to be moved off of the site or to another position on the site.*

**Staff comment: Not in compliance.** The operator has confirmed in several reports and email correspondence that all workover rigs brought to the facility are equipped with Tier 4 rigs. In March and April 2026, the operator was performing well servicing on different wells at the Drill Site. OZA staff inquired with the operator about whether the workover rig at the site was equipped with a Tier 4 engine. On March 26, 2026, the operator responded via email with registration information illustrating that the engine serial number was tied to a Tier 4 engine designation. The operator, however, has not yet secured electric workover rig operations despite the technology now both feasible and available in the United States and in California (see Staff Comment for Condition No. 25 above for further explanation).

In addition, a pipeline pressure test activity that took place in November 2025 included the use and operation of a Tier 3 diesel engine – and not Tier 4 as required by the condition. The pipeline test activity – which the operator did not proactively inform the OZA of prior to the commencement of the testing activities – was conducted by the operator's permission and included two additional companies. Crimson Pipeline and Vapor Point LLC were two firms present during the pipeline test activity according to agency documents and agency interviews, including discussions with SCAQMD inspectors. OZA staff learned from the SCAQMD inspector that visited the Drill Site numerous times throughout the duration of the pipeline test activity that Vapor Point LLC had brought an air scrubber (industrial air filtration system) for the degassing of container storage tanks at the Drill Site following the pipeline test. The SCAQMD inspector confirmed in a phone call with OZA staff on February 4, 2026 that he observed the internal combustion engine for Vapor Point LLC's equipment as "Tier 3" and not Tier 4. Both Crimson Pipeline and Vapor Point LLC were cited with Notices of Violation by SCAQMD in November 2025. Moreover, Crimson Pipeline personnel confirmed in a phone call with OZA staff on November 12, 2025 that the operator (E&B Natural Resources) did not make Crimson Pipeline aware of local land use and zoning regulations included in Case No. ZA-1959-15227-O-PA6-1A. More information on the pipeline test activity is included in the Administrative Record as a "Note to File" dated January 5, 2026. The use of a Tier 3 engine during the pipeline testing activity raises concerns regarding oversight of contractor compliance with the site's Conditions of Approval. Because the Conditions of Approval run with the property, all entities performing work at the site are subject to the applicable requirements, and the operator is responsible for ensuring that such activities are conducted in accordance with those conditions.

27. *The operator shall remain in compliance with city, county, state and federal regulations specifically regulating idle wells, including CalGEM's Idle Well Program. The operator*

*shall plug and abandon idle wells as required by and in accordance with any city, county, state and federal regulations.*

**Staff comment: Partial compliance.** The operator has shared conflicting information regarding the well status of Well “Murphy 18” (API No. 0403700385) with OZA staff. According to CalGEM records, Murphy 18 is designated as an idle well because it has not been operating nor has the well produced any oil since February 2023. Despite these details, the operator claimed in a June 2, 2025 meeting with OZA staff that there were no idle wells present at the Drill Site. When the OZA inquired further about idle wells in a September 2, 2025 Letter of Communication to the operator, E&B Natural Resources confirmed in a written response dated November 24, 2025 that there were no idle wells present at the facility. The operator, instead, explained that the lack of production data for Murphy 18 was a result of a reporting error and that they would contact CalGEM to correct the data. However, CalGEM confirmed in an email correspondence, dated January 29, 2026, that the operator had not attempted to update product data and thus, the idle well designation was indeed correct. CalGEM records, included in the Administrative Record, demonstrated that Murphy 18 was officially declared “idle” as of March 1, 2025. CalGEM designates an oil well as “idle” if the well has not operated in over 24 months. Although the facts and evidence confirm that Murphy 18 was an idle well throughout the various OZA inquiries regarding idle wells at the Drill Site, the operator gave inaccurate details to OZA staff. This is an important detail to highlight because the operator, regardless if intentionally or not, was not providing accurate information to OZA staff. The status of oil wells, including idle wells, is critical information for the City to track due to the growing number of idle wells in the City. In addition, idle wells must undergo strict safety testing in order to safeguard public health and environmental safety. Accurate identification of well status is critical to enabling regulatory agencies to assess the condition of the oil drilling site and determine the appropriate safety measures, inspections, and testing required to identify and mitigate risks associated with oil drilling operations at the site. Thus, the inconsistency and incomplete explanations provided by the operator raise compliance concerns with the portion of this condition requiring adherence to idle well regulations.

*28. Monitoring Program. The following measures shall be utilized by the operator to maintain regular and assured oversight of the well site in a residential neighborhood.*

- a. The operator shall install an early alert detection system which will alert the Los Angeles City Fire Department (LAFD) of hydrogen sulfide and methane leaks. A protocol for the construction, installation and operation of the system shall be established to the satisfaction of the LAFD and CalGEM within 90 days of the effective date of this Determination letter and submitted to the Office of Zoning Administration for placement in the case file. Such system shall remain in operation during the lifetime of the drill site operation.*

- b. The operator shall install a state-of-the-art fire suppression system which shall use, but not be limited to, more effective fire suppressants such as foam. The system shall be constructed to the satisfaction of the LAFD; with the clearance from the LAFD for its design.*
- c. The operator shall formally arrange with the LAFD Oil Wells Unit and the LAFD CUPA Program, for annual monitoring of the operation at the subject site, including but not limited to inspection of the systems described above. Copies of all monitoring inspection reports shall be filed with the Office of Zoning Administration and the Petroleum Administrator.*

**Staff comment: In compliance.** No reports have been received from LAFD regarding violations. Per Fire Department correspondence no active violations have been found on the site.

- 29. The operator, in the event of ceasing and/or decommissioning the drill site, shall test for potential hydrocarbon contamination in specific areas. The operator, or responsible party, shall test for soil data under the well cellar and tank battery area of the drill site. If contamination is found to be present then the area shall be remediated according to the standards and satisfaction of the Los Angeles Regional Water Quality Control Board. All excavations and depressions shall be filled with clean soil. All oil, refuse and waste shall be removed from the drill site pursuant to city, county, state and federal laws and regulations. The operator, or responsible party, shall remove all underground and above-ground storage tanks in accordance with city, county, state and federal laws and regulations.*

**Staff comment: Not Applicable.** The operator has not proposed to cease oil production operations on this site.

- 30. All production installations or facilities shall be removed and the premises restored to its original condition after all oil and gas wells have been abandoned in accordance with city, county, state, and federal regulations.*

**Staff comment: Not Applicable.** The operator has not proposed to cease oil production operations on this site.

- 31. The operator shall record a covenant acknowledging and agreeing to comply with all the terms and conditions established herein shall be recorded in the County Recorder's Office. The agreement (standard main covenant and agreement form CP-6770) shall run with the land and shall be binding on any subsequent owners, heirs or assigns. The agreement with the conditions attached must be submitted to the Department of City Planning for approval before being recorded. After recordation, a certified copy bearing the Recorder's number and date shall be provided for inclusion in case file.*

**Staff comment: In compliance.** On June 24, 2024, a covenant and agreement (Instrument No. 20240407961) with 33 conditions of approval imposed under Case No. ZA-1959-15227-O-PA6-1A was recorded with the County of Los Angeles Records office on June 24, 2024.

32. *When a Condition of ZA-1959-15227-O-PA6 conflicts with Los Angeles Municipal Code Section 12.23-C,4, as recently adopted by Ordinance No. 187,709, and effective on January 18, 2023, Section 12.23-C,4 shall supersede on matters regarding the drilling of new wells or the redrilling of existing wells to increase extraction. All other conditions in ZA-1959-15227-O-PA6 shall remain in effect.*

**Staff comment: Not Applicable.** Administrative condition. This Condition references Ordinance No. 187,709, which has been rescinded by the City Council and is no longer in effect. However, all other Conditions of Approval in ZA-1959-15227-O-PA6-1A remain in effect.

33. *Indemnification and Reimbursement of Litigation Costs. Applicant shall do all of the following:*

- i. Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.*
- ii. Reimburse the City for any and all costs incurred in defense of an action related to or arising out of the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.*
- iii. Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than \$50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).*
- iv. Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit*

*does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).*

- v. If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.*

**Staff comment: Not Applicable.**

Comments from the Operator/Representative

On July 3, 2026, the operator's representative, Alston & Bird LLP, submitted a letter objecting to the Notice of Public Hearing regarding the possible discontinuance of operations at the Drill Site. The letter alleges that the content of the hearing notice is insufficient and the amount of notice provided is inadequate, and states that the Operator requires additional time in order to investigate and respond to the allegations raised. The letter states that the Operator objects to the hearing date scheduled for July 23, 2026, and seeks a continuance of at least 30 days. On July 8, 2026, OZA staff responded to this letter indicating that the nuisance abatement/revocation proceedings for the Drill Site were properly noticed and the public hearing would proceed as originally planned, on July 23, 2026.

Comments from the General Public

The Office of the Zoning Administration received communications from stakeholders alleging violations with the site's operations. The correspondence below, spanning January 2024 through June 2026, is presented in reverse chronological order (most recent to oldest):

On July 7, 2026, the United Neighborhoods Neighborhood Council (UNNC) submitted a letter and, along with a member of the Jefferson Park United, attended the South Los Angeles Area Planning Commission meeting to raise concerns regarding the subject nuisance abatement/revocation proceedings. On July 10, 2026, OZA staff responded that the procedural requirements for the subject case have been met.

On June 1, 2026, EarthJustice submitted a letter claiming deficiencies in the required annual report dated March 11, 2026. EarthJustice claims the annual report did not provide meaningful or accurate information about the operations, safety or measures to reduce the impacts to the surrounding community.

On April 8, 2026, Redeemer Community Partnership inquired again to identify possible remedies for the lack of sound curtain facing the east side of the workover rig. This email was a follow-up message from an email dated March 20, 2026. The constituent confirmed the lack of a sound curtain with photographic evidence of the workover rig present at the site. The constituent further confirmed that audible, noticeable workover rig operations were still taking place at the Drill Site. Specifically, the constituent highlighted elevated noise levels from metal clanging of pipe and the revving of the workover rig's diesel motors.

On March 20, 2026, Redeemer Community Partnership emailed the OZA with noise concerns and concerns about noncompliance with sound curtain requirements. The constituent included photographic evidence in their email correspondence showing a workover rig at the Drill Site for purposes of (according to the operator) Well Servicing activities. The constituent included in their email concerns about "metal clanging" and a lack of sound curtain on the east side of the workover rig -- in contrast to the requirement outlined in Condition 7 a.

On February 9, 2026, Dr. Jill Johnston of the Department of Environmental and Occupational Health at the University of California at Irvine, submitted a letter to the Office of the Zoning Administration indicating inadequate air emission data being reported, failure to notify nearby communities about air quality readings, failure to report air emission readings during the hydrostatic testing, and the poor locations of the air monitor sensors, as they do not accurately capture downwind concentrations of air pollutants. The letter was also signed by Dr. Caroline Frischmon and Dr. Michael Hannigan, also affiliated with the Hannigan Air Quality Lab research center

On February 2, 2026, a stakeholder forwarded an email from the CalGEM Southern District Office confirming the idle well status for Murphy Well No. 18.

On January 30, 2026, EarthJustice submitted a letter to the Office of Zoning Administration responding to a correspondence from the E&B Natural Resources Third-Party Audit of the Murphy Production Site. EarthJustice alleges that E&B Natural Resources violates conditions related to the hours of operation, fenceline monitoring measurements, production enclosure, microturbine usage, electric workover rigs, idle well regulations, unpermitted cement work, and spill plan.

On January 5, 2026, the OZA issued a "Note to File" memorandum summarizing the timeline and research into the November 2025 pipeline test conducted at the Murphy Oil Drill Site. The memo also includes details on the persons and inspectors that OZA staff consulted with during and after the pipeline test activities had concluded.

On December 2, 2025, Redeemer Community Partnership submitted a letter notifying the Office of the Zoning Administration a 10-day operation relating to the hydrostatic pressure test conducted on the Murphy Oil Drill site and the air emissions violations associated with this operation, the operation being conducted outside the permitted hours of operation and violation of conditions requiring the use low emissions equipment (Tier 4 equipment) to conduct operations on the site.

On November 24, 2025, the operator submitted a response to the OZA's Letter of Communication from September 2, 2025. The operator submitted several attachments to this response.

On November 21, 2025, the South Coast Air Quality Management District issued a press release regarding the subject drill site stating "From November 5 to 13, multiple complaints were received regarding operations at the Murphy Drill Site and their proximity to the nearby 24th Elementary School. Inspectors conducted several on-site inspections and found a portable vapor control system operating within 1,000 feet of the school, violating a condition of the equipment's air quality permit. An NOV was issued to both Crimson Resources and its contractor, Vapor Point, LLC. Since then, inspectors have verified that the portable vapor control system - which was

being used to control emissions during pipeline pressure testing - was removed from the site on November 13, and no further complaints were received.”

On November 11, 2025, a local resident emailed the Director of Planning asking why she was not informed about a project and safety concerns. Another local resident emailed the Director of Planning explaining that she has two children that are impacted by the activity at the drill site and urged to abate the public nuisance.

On November 10, 2025, a local resident emailed the Director of Planning with a request to abate the nuisance at the subject drill site. The resident stated that a test was being conducted that emitted toxic fumes and no warning was provided.

On November 5, 2025, the OZA contacted the operator concerning constituent inquiries about excessive Drill Site activity, including the delivery of several storage containers to the facility. The operator responded that a third-party pipeline company was conducting a pipeline test and staging the activity at the Drill Site. The operator then confirmed that they had no further information and that E&B Natural Resources did not “have any authority over their business” taking place at the Drill Site leased by the operator.

On September 2, 2025, the OZA issued a Letter of Communication requesting a significant amount of outstanding information, details, and explanation with regards to numerous conditions of approval. The information requested included items and condition compliance concerns as far back as the May and June 2025 meetings with the operator. The operator was required to respond within 60 days. The operator followed up with the OZA two months requesting an additional 60-day window to respond. The OZA granted a one-time 30-day extension.

On May 28, 2025, EarthJustice submitted a letter requesting that the Office of Zoning Administration abate ongoing nuisances at the Murphy Oil Drill Site. EarthJustice raised concerns regarding lighting, graffiti, CalGEM and SCAQMD Notices of Violations, and hours of operation. EarthJustice requested the Zoning Administrator to impose additional conditions such as fully enclosing the drill site, requiring the use of electric workover rigs, and prohibiting burning of methane gas.

On May 19, 2025, the OZA contacted the operator to schedule a subsequent meeting for June 2, 2025 to follow up on unresolved issues raised during the May 19, 2025 meeting. In this email correspondence, the OZA shared with the operator examples of real-time air monitoring platforms that were referenced in the virtual meetings with the operator.

On May 1, 2025, a local resident within the vicinity of the Drill Site emailed the OZA identifying concerns about maintenance acidizing activities that were set to take place. The resident also highlighted that the operator had not, allegedly, followed requirements regarding SCAQMD-required mailing notification for Rule 1148.2 Notifications (e.g. maintenance acidizing). However, as explained above under the Preliminary Compliance Assessment of Condition No. 17 for Case No. ZA-1959-15527-O-PA6-1A above, those activities were ultimately never conducted.

On April 23, 2025, the OZA emailed the operator to arrange a virtual meeting conference concerning questions, clarifications, and ambiguities regarding the 2025

submittal of the Annual Safety Inspection Report. The operator met with the OZA on May 19, 2025. A follow-up and second meeting took place on June 2, 2025 to address items that were not discussed on May 19, 2025. In this email correspondence, OZA staff requested specific information from the operator concerning microturbine energy use and fenceline monitoring.

On October 11, 2024, Redeemer Community Partnership copied the OZA on an email correspondence addressed to the Los Angeles Department of Building and Safety. The email correspondence concerned the issue of potentially unpermitted construction at the Drill Site. The email correspondence also references a Customer Service Request / LADBS Complaint that was submitted regarding the concern about potential unpermitted construction.

On August 5, 2024, the operator notified the OZA via a mass email correspondence that the well abandonment activity on Well Murphy 21 at the Drill Site would begin on or around August 12, 2024. The operator's email correspondence included the phrasing "You are receiving this courtesy email of upcoming project work activities because you signed up for email notifications through our website." To the date of this report, OZA staff is not aware of any subsequent email notifications issued by the operator concerning operational activities at the Drill Site.

On July 25, 2024, the operator submitted a formal response to the OZA regarding a June 7, 2024 Letter of Communication. In the operator's response, E&B Natural Resources disputed the OZA's interpretation on "heavy truck" traffic and asserted that they were in compliance with Condition No. 7 of Case No. ZA-1959-15227-O-PA6-1A.

On July 15, 2024, Redeemer Community Partnership submitted photographic evidence and testimony pertaining to numerous land use issues. The correspondence summarized the adverse land use impacts being experienced by residents as well as the potential violation of several conditions of approval. The letter discussed issues related to graffiti on drill site exterior walls, potentially unpermitted construction, and inaccurate information regarding idle wells at the drill site.

On July 5, 2024, the operator emailed the OZA asking for clarification on a June 7th Letter of Communication specifically pertaining to truck delivery operations at the drill site. The OZA confirmed with the operator how "heavy truck" would be interpreted pursuant to Condition No. 7 in Case No. ZA-1959-15227-O-PA6-1A.

On June 20, 2024, the operator emailed the OZA sharing a publicly accessible webpage link to a dedicated company website page exclusively for news and updates for the Murphy Drill Site.

On June 7, 2024, the OZA issued a Letter of Communication to the operator requiring information, timeline details, and elaboration of the efforts to comply with several conditions pertaining to idle well compliance, the production site structure, microturbines, fenceline monitoring, and drill site truck delivery activity.

On May 1, 2024, Redeemer Community Partnership inquired with the OZA about the operator's initiation of a fenceline monitoring program and questions about LAFD Oil

Wells Unit oversight of the facility, specifically Condition No. 19 and Condition No. 28 of Case No. ZA-1959-15227-O-PA6-1A.

On February 27, 2024, Redeemer Community Partnership submitted a letter summarizing concerns and impacts from excessive heavy truck traffic entering the drill site's production area outside the permitted hours of operation for facility deliveries. A chart log with dates, time stamps, and videographic evidence was attached to this letter illustrating said off-hours drill site truck activity.

#### Comments from Council

**Council File No. 26-0059** - On February 25, 2026, the City Council approved a motion introduced by Council District 10 with instructions as follows:

*"INSTRUCT the Department of City Planning, with the assistance of the Department of Building and Safety and the Los Angeles Police Department, and in consultation with the City Attorney, to investigate any matters of reported nuisance activities occurring onsite at the properties located at 2126 West Adams Boulevard, Los Angeles, CA 90018 and 2125 West 26th Place, Los Angeles, CA 90018; and thereafter, the Zoning Administrator may initiate Administrative Nuisance Abatement Proceedings per Los Angeles Municipal Code Section 12.27.1; Chapter 1A Section 13B.6.2; and prepare the necessary reports and recommendations, conduct the required public hearings, and thereby protect the public peace, health, and safety of the community by imposing corrective conditions to address the reported nuisance activities that are occurring onsite at the property."*

#### **On-Site Cases, Affidavits, Permits, and Orders**

**Los Angeles Department of Building and Safety Permit No. 26041-10000-13854** - On June 9, 2026, Los Angeles Department of Building and Safety issued a permit for a power plan check to install a Capstone C600 microturbine generator system that includes a switchgear, zig-zag grounding transformer for neutral derivation, feeders, and other electrical infrastructure. The work also includes grounding, bonding and connection to the existing electrical system.

**Ordinance No. 188,623** - Effective on July 16, 2025, an ordinance rescinding Ordinance No. 187,709, which prohibited new oil and gas extraction and made existing extraction activities a nonconforming use in all zones. As a result, the amended Sections 12.03, 12.20, 12.23, 12.24, and 13.01 of Chapter 1 of the Los Angeles Municipal Code returned to the same language and effect as they had prior to their amendment by Ordinance No. 187,709.

**Case No. ZA-2025-2976-ZAI-1A** - On an October 9, 2025 meeting, the City Planning Commission, determined that the Well Maintenance ZAI is not a "Project" as defined by CEQA, denied the appeals submitted by Warren Resources, Inc. and E&B Natural Resources, and affirmed the Well Maintenance ZAI initially issued on June 12, 2025. The City Planning Commission issued this appeal determination on November 10, 2025. On May 1, 2026, City Council took final action to uphold the CEQA determination in conjunction with the ZAI pursuant to Case No. ENV-2025-3305-CE-1A.

**Case No. ZA-2025-2976-ZAI** - On June 12, 2025, a Zoning Administrator's Interpretation

issued interpreting what drill site activities qualify as well maintenance.

**Case No. ZA-1959-15227-O-PA6-1A** - On January 31, 2024, the South Los Angeles Area Planning Commission denied the appeal in part and granted the appeal in part, and modified conditions of approval.

**Case No. ZA-1959-15227-O-PA6** - On February 28, 2023, the Zoning Administrator approved additional and modified conditions required for the continued operation of the existing Murphy Oil Drill Site to increase the protection of and to preserve the health, safety and general welfare of the residents and stakeholders of the neighborhood.

**Ordinance No. 187,709** - On December 2, 2022, the Los Angeles City Council passed an Ordinance amending Sections 12.03, 12.20, 12.23, 12.24 and 13.01 of the Los Angeles Municipal Code to prohibit new oil and gas extraction and make existing extraction activities a nonconforming use in all zones.

**Los Angeles Department of Building and Safety Permit No. 07020-20000-02565** - On November 14, 2017, Los Angeles Department of Building and Safety issued a Certificate of Occupancy for reinforced concrete equipment foundation pads.

**Case No. ZA-15227(O)(PA5)** - On, June 30, 2016, the Zoning Administrator denied, the installation and use of a Clean Enclosed Burner ("CEB800") and appurtenant sound attenuation wall and modification of Condition No. 49 of Section 13.01-F with respect to hours of operation during project construction at the site.

**Case No. ZA 15227(O)(PA4)-1A** - On June 3, 2014, the South Los Angeles Area Planning Commission denied appeals from two appellants. The parties involved agreed that issues will be raised at the public hearing for a subsequent Plan Approval.

**Case No. ZA 15227(O)(PA4)** - On December 26, 2013, the Zoning Administrator approved the installation of the CEB800 and Sound Wall subject to specific conditions. On March 11, 2014, the Zoning Administrator issued a communication clarifying that the determination is appealable and established a fifteen-day appeal period.

**Ordinance No. 181,769** - On June 28, 2011, the Los Angeles City Council passed an ordinance to establish the Jefferson Park Historic Preservation Overlay Zone (HPOZ).

**Case No. ZA 15227(O)(PA4)** - On December 26, 2007, the Zoning Administrator approved the expansion of an existing gas plant on the facility, subject to specific conditions. Equipment additions included six vertical absorbers, a gas compressor, a recirculation pump, a heat exchanger, and sound enclosures, all manufactured off-site, to be installed on the premises.

**Case No. ZA 15227(O)(PA4)** - On September 14, 2007, the Zoning Administrator approved methods and conditions controlling drilling and production operations for the expansion of the existing well cellar with a maximum of twelve new well slots, including the drilling of two new Class "A" oil wells and one Class "B" well, respectively identified as M-28, M-29, and M-30 of the Murphy Oil Drill Site within Urbanized Oil Drilling District Nos. U-37 and M-30 respectively, and the future drilling of nine additional wells for a maximum total of 38 well slots.

**Case No. ZA 15227(O)(PA3)** – On March 13, 2006, the Zoning Administrator approved methods and conditions controlling drilling and production operations for the re-drilling of three Class "A" oil wells, including the conversion of two Class "B" wells into Class "A" wells, identified as M-2RD1, M-12RD1, and M-14RD2 of the Murphy Oil Drill Site within Urbanized Oil Drilling District Nos. U-36, U-37, and U-82 respectively.

**Case No. ZA 15227(O)(PA2)** – On April 15, 2005, the Zoning Administrator approved a request for a Plan Approval pursuant to the instruction of the Chief Zoning Administrator, relative to initiating Council Motions (Ludlow-Reyes and Perry-Parks), dated April 13, 2004, in which it has been determined that the subject use poses no significant nuisance to adjoining or neighboring properties. The subject of the Council Motions was, in part, concerning resident complaints of oil fumes and noise arising from recent oil drilling operations at site.

**Case No. ZA 15227(O)(PA1)** – On August 1, 2003, the Zoning Administrator approved a request for an approval of plans to temporarily modify Condition No. 12 of Case No. ZA 15227 to allow the re-drilling of two oil wells on a 24-hour, seven day per week basis for approximately 40 days.

**Case No. ZA 15227** – On February 15, 1994, the Zoning Administrator approved a request for methods and conditions for the expansion of an existing well cellar at the Murphy Oil Drill Site in order to provide additional space for the future drilling of six Class "A" oil wells.

**Case Nos. ZA 15227 and 16182** – On June 22, 1993, the Zoning Administrator approved a request for methods and conditions for the re-drilling of three Class "A" oil wells identified as 26RD2, 16RD, and 5RD of the Murphy Oil Drill Site involving Urbanized Oil Drilling District Nos. U-82 and U-37.

**Case Nos. ZA 15227 and 15890** – On January 22, 1993, the Zoning Administrator approved a request for an approval of plans to remove and distribute 366 cubic yards of dirt at the Murphy Oil Drill Site in order to provide additional space for the re-drilling of three Class "A" oil wells.

**Case Nos. ZA 15227 and 15890** – On December 29, 1992, the Zoning Administrator approved a request for methods and conditions for the re-drilling of three Class "A" oil wells identified as 10 RD2, 22 RD, and 21 RD of the Murphy Oil Drill Site involving Urbanized Oil Drilling District Nos. U-36 and U-37.

**Case Nos. ZA 15227 and 15890** – On February 4, 1992, the Zoning Administrator approved a request for methods and conditions for the re-drilling of one Class "A" oil well identified as Murphy No. 7 involving Urbanized Oil Drilling District Nos. U-36 and U-37.

**Case No. ZA 15227** – On July 18, 1985, the Zoning Administrator approved plans for the installation and operation of gas treating equipment to extract carbon dioxide from natural gas on property identified as the Murphy Oil Drill Site.

**Case Nos. ZA 15227 and 20385** – On April 4, 1972, the Zoning Administrator approved plans for construction of an approximately 10 feet by 40 feet enlargement onto the easterly side of the well cellar on the Murphy Oil Drill Site, with the new construction containing space for four additional oil wells.

**Case No. ZA 20385** – On November 25, 1970, the Zoning Administrator approved a request for methods and conditions for the re-drill of Murphy No. 18 oil well bottomed under Oil Drilling District No. 36 and for drilling of Murphy No. 22 bottomed under U-82, and for temporary relaxation of Condition Nos. 1, 3, 6, 7, 8 and 12 of extant ZA Case No. 15227.

**Case No. ZA 19951** – On September 10, 1969, the Zoning Administrator approved a request for methods and conditions for the resumption of drilling operations for oil wells to be bottomed in the involved Oil Drilling District U-37 and adjoining Districts U-36, U-38 and U-82.

**Case No. ZA 15227** – On November 14, 1966, the Zoning Administrator approved plans for alterations primarily in the way of a new door and vent in the existing electric switch house on the southerly side of the subject property.

**Case Nos. ZA 15227, 15891, and 15973** – On April 13, 1966, the Zoning Administrator approved the temporary installation and operation of an enclosed hydraulic pumping unit only for Well No. 10 on the controlled drill site.

**Case No. ZA 15227** – On April 9, 1963, the Zoning Administrator approved plans for an addition to the compressor building, a new Glycol generator and absorber installation, and a clean-up tank.

**Case No. ZA 16218** – On June 15, 1962, the Zoning Administrator approved the use of the subject drill site and use of the subsurface underneath the 160-acre District No. U-82 for the bottoming of an exploratory oil well.

**Case No. ZA 16185** – On June 15, 1962, the Zoning Administrator approved the use of the subject drill site and use of the subsurface underneath the 160-acre District No. U-81 for the bottoming of an exploratory oil well.

**Case No. ZA 16184** – On June 7, 1962, the Zoning Administrator approved the use of the subject drill site and use of the subsurface underneath the 153-acre District No. U-84 for the bottoming of an exploratory oil well.

**Case No. ZA 16183** – On June 7, 1962, the Zoning Administrator approved the use of the subject drill site and use of the subsurface underneath the 150-acre District No. U-83 for the bottoming of an exploratory oil well.

**Case Nos. ZA 15227 and 15937** – On June 1, 1962, the Zoning Administrator approved plans for the permanent production facilities, including additional gas-oil separators, a vapor compressor, tanks, gas scrubbers, and accessory buildings.

**Case No. ZA 16182** – On May 24, 1962, the Zoning Administrator approved the use of the subject drill site and use of the subsurface underneath the 160-acre District No. U-82 for the bottoming of an exploratory oil well.

**Case Nos. ZA 15227 and 15937** – On December 27, 1961, the Zoning Administrator approved plans for limited production facilities on the site such as drain and skimmer pits, gas-oil separators, relief line scrubber and well manifolding.

**Case No. ZA 15937** – On November 1, 1961, the Zoning Administrator approved the use of

the subject drill site and use of the subsurface underneath the 776-acre District No. U-36 to U-40 for the bottoming of not to exceed 16 oil wells.

**Case No. ZA 15912** – On October 2, 1961, the Zoning Administrator approved the use of the subject drill site and use of the subsurface underneath the 158-acre District No. U-40 for the bottoming of not to exceed eight oil wells.

**Case No. ZA 15911** – On September 29, 1961, the Zoning Administrator approved the use of the subject drill site and use of the subsurface underneath the 146-acre District No. U-39 for the bottoming of not to exceed seven oil wells.

**Case No. ZA 15891** – On August 31, 1961, the Zoning Administrator approved the use of the subject drill site and use of the subsurface underneath the 153-acre District No. U-38 for the bottoming of not to exceed seven oil wells.

**Case No. ZA 15890** – On August 30, 1961, the Zoning Administrator approved the use of the subject drill site and use of the subsurface underneath the 160-acre District No. U-36 for the bottoming of not to exceed eight oil wells.

**Case No. ZA 15227** – On May 9, 1961, the Zoning Administrator approved plans for landscaping, camouflage for the derrick acoustical quilt, derrick, DC converter house, mud pump, and shaker house.

**Case No. ZA 15227** – On May 2, 1961, the Zoning Administrator approved plans for drilling equipment and various facilities, grading, retaining walls, masonry walls, drainage concrete structures, drilling cellar, drilling pad, and gates on the subject Property.

**Case No. ZA 15227** – On April 5, 1961, the Zoning Administrator approved the use of the subject property as a controlled drilling site not to exceed five oil wells under certain prescribed conditions and methods of operation with the understanding that additional wells may later be permitted.

**Ordinance No. 114,701** – On October 6, 1959, the Los Angeles City Council passed an Ordinance amending Sections 12.04 and 13.01 of the Los Angeles Municipal Code, establishing Oil Drilling District No. U-37.

*Rony Giron*

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