

PXP

Fugitive Dust Control Plan Inglewood Oil Field

Baldwin Hills CSD Condition
E.2.p; L.2.e

March 2009

Prepared for:

**Plains Exploration & Production Co.
5640 South Fairfax Avenue
Los Angeles, CA 90056**

Prepared by:

**InterAct PMTI
4567 Telephone Rd., Suite 203
Ventura, CA 93009**

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1.0 INTRODUCTION

1.1 Background

Plains Exploration & Production Company (PXP) operates the Inglewood Oil Field in the Baldwin Hills zoned District of Los Angeles County. The Inglewood Oil Field, which covers approximately 1,000 acres, is surrounded by single and multiple family dwellings as well as recreational, institutional, commercial, and industrial uses. To address issues of land use compatibility with surrounding land uses, the Los Angeles County Board of Supervisors recently adopted the Baldwin Hills Community Standards District (CSD) to provide a means of implementing regulations, safeguards, and controls for activities related to drilling for and producing oil and gas within the Inglewood Oil Field.

The Baldwin Hills Community Standards District (CSD) Section E.2.p states,

“The operator shall comply with the provisions of a fugitive dust control plan that has been approved by the director. The plan shall be based upon the requirements of SCAQMD Rule 403 and the SCAQMD CEQA Guideline Fugitive Dust Control Measures. The fugitive dust control plan shall be reviewed by the operator every five years to determine if modifications to the plan are required. Any modifications to the fugitive dust control plan shall be submitted to the director for review and approval. The fugitive dust control plan shall include any measured requested by the director.”

In addition, the implementation of the Fugitive Dust Plan is dictated by CSD Section L.2.e:

“Within 120 days following the effective date, or at such later date as may be approved by the director for good cause shown, the operator shall develop and deliver for review and approval a fugitive dust control plan as specified in subsection E.2.p. The operator shall take such actions as may be necessary for the plan to be approved by the director.”

1.2 Purpose of the Fugitive Dust Control Plan

The purpose of the Fugitive Dust Control Plan is to identify methods that PXP can employ to prevent, reduce, or mitigate the amount of fugitive dust in the ambient air as a result of activities within the Inglewood Oil Field.

The Fugitive Dust Control Plan will serve to minimize fugitive dust emissions from potential future oil field activities and prevent impacts to air quality, biological resources, and visual resources of the surrounding communities.

2.0 POTENTIAL DUST GENERATING ACTIVITIES

Current oil field operations include the extraction of oil and gas from subsurface reservoirs, processing the crude oil to remove water, and processing the gas to remove water and gas liquids.

Over the next 20 years, PXP plans to continue its development of the Inglewood oil field. Increased oil production could require construction and operation of a number of new facilities or modification of existing facilities. These activities could require grading, excavation, back-

filling, access road construction, and demolition activities, all of which have the potential to generate fugitive dust.

3.0 FUGITIVE DUST CONTROL MEASURES

To reduce the amount of fugitive dust generated from oil field activities, PXP will implement the following control mitigation measures as identified in the Final Environmental Impact Report (EIR) for the Baldwin Hills CSD and as listed in the SCAQMD Rule 403, when and where appropriate:

- Limit on-site vehicle speeds (on unpaved roads) to 15 mph.
- Implement watering once a day for traveled industrial unpaved roads.
- Limit vehicular travel to established unpaved roads (haul routes) and unpaved parking lots. Stabilize soils of unpaved roads and parking lots to minimize dust emissions.
- Water storage piles or apply cover when wind events are declared.
- Stabilize stockpiled materials and maintain storage piles to avoid steep sides or faces. Stockpiles within 100 yards of off-site occupied buildings must not be greater than eight feet in height; or must have a road bladed to the top to allow water trucks access or must have an operational water irrigation system that is capable of complete stockpile coverage. Add or removed material from the downwind portion of the storage pile.
- For truck loading, pre-water material prior to loading and ensure that freeboard exceeds six inches (CVC 23114). Empty loader bucket such that no visible dust plumes are created and ensure that the loader bucket is close to the truck to minimize drop height while loading.
- When clearing and grubbing, stabilize soil prior to, during and immediately after clearing and grubbing activities by applying sufficient water to prevent dust and maintaining live perennial vegetation where possible.
- When cutting and filling, pre-water soil prior to and stabilize during and after cut and fill activities. For large sites, pre-water with sprinklers or water trucks and allow time for penetration
- When backfilling, mix backfill soil with water prior to moving, dedicate a water truck or high capacity hose to backfilling equipment, empty loader bucket slowly so that no dust plumes are generated, and minimize drop height from loader bucket.
- Tarp all trucks hauling dirt, sand, soil, or other loose materials with a fabric cover and maintain a freeboard height of 6 inches prior to leaving the lease.
- Install pipe-grid trackout-control device or a gravel bed trackout apron (3 inches deep, 25 feet long, 12 feet wide per lane and edged by rock berm or row of stakes) to reduce mud/dirt trackout from unpaved truck exit routes.
- Require minimum soil moisture of 12% for earthmoving by use of a moveable sprinkler system or a water truck. Moisture content can be verified by lab sample or moisture probe.
- For earth-moving activities, pre-apply water to soil to stabilize to maintain soils in a damp condition and to ensure that visible emissions do not exceed 100 feet in any

direction. Grade each project phase separately, timed to coincide with construction phase. Upwind fencing can be used to prevent material movement on site.

- Apply water every 3 hours to disturbed areas within a construction site and at the end of each workday.
- Stabilize disturbed soil throughout the construction site and between structures by limiting vehicular traffic and disturbances on soils where possible.
- Limit construction projects or schedule them, to the extent possible, such that they are not concurrent to prevent grading at multiple locations.
- For trenching, pre-water material prior to trenching. For deep trenching activities, pre-trench to 18" soak soils via the pre-trench and resume trenching.
- During landscaping, stabilize soils, materials, and slopes by applying water, maintaining materials in a crusted condition and maintaining effective cover over materials. Also stabilize sloping surfaces using soil binders until vegetation or ground cover can effectively stabilize the slopes and hydro-seed prior to rain season.
- Prohibit demolition activities when wind speeds exceed 25 mph.
- During mechanical or manual demolition, stabilize wind erodible surfaces, surface soil where support equipment and vehicles will operate and loose soil and demolition debris by applying sufficient water to prevent the generation of visible dust plumes.
- Apply water every 4 hours to the area within 100 feet of a structure being demolished, to reduce vehicle trackout.
- Apply dust suppressants (e.g., polymer emulsion and or water) to disturbed areas at the end of each day and upon completion of demolition.
- For crushing, stabilize soils prior to operation of support equipment and stabilize material after crushing by applying water.

4.0 POTENTIAL ADDITIONAL IMPLEMENTATION STEPS

The SCAQMD and Los Angeles County Department of Regional Planning (County) shall review this Fugitive Dust Plan and be responsible for monitoring and enforcement.

PXP is responsible to review the plan every 5 years to determine if modifications to the plan are required.

4.1 Dust Control Personnel Training

To ensure that the dust control measures are adhered to, prior to construction of new facilities and drilling pad construction projects, PXP will conduct an employee and contractor Awareness Training which will include all applicable Dust Control Measures and the importance of strict compliance. PXP's Environmental Health & Safety (EH&S) staff will track training events and will conduct internal inspections to make sure appropriate dust control measures are being implemented.

4.2 Compliance Checklists

Prior to construction of new facilities and drilling pad construction projects, the site foreman will assign personnel to check implementation of the Dust Control Measures. The foreman will check off the items on the Field Foreman's Dust Mitigation Check List prior to executing the project. The assigned personnel – Monitor (who can have other responsibilities) – will be responsible to check off the required measures on the daily log, depending on the size of the project, and measures applicability. (The identified log may be incorporated into the other construction logs, and may not need to be a stand-alone document.)

The Monitor will report any activities of noncompliance or questionable compliance to the site foreman as soon as possible so that these situations can be immediately addressed.

4.3 PXP Ombudsperson(s)

In accordance with the CSD, PXP will also designate employees or authorized agents to serve as Ombudspersons to respond to questions and concerns from the public relating to oil field operations, including dust complaints, if any. The Ombudsperson will be familiar with all the provisions of the CSD and all conditions of approval related to permits and approvals issued by the County or other agencies. The Ombudsperson will also be responsible for facilitating, to the extent feasible, the prompt resolution of any issues that may arise relating to compliance matters or impacts of the oil field operations.