



September 16, 2026

Via Email Only

Paulina Somosa,
LA County Planning, Ordinance Studies Section
320 West Temple Street, Floor 13.
Los Angeles, CA 90012
ordinance@planning.lacounty.gov

**Re: Revised Oil Well Ordinance (ROWO)- Draft Environmental Impact Report (EIR),
SCH# 2025031377**

Dear Paulina Somosa,

The California Department of Conservation, Geologic Energy Management Division (CalGEM) thanks you for the opportunity to provide comments and recommendations on the Draft Environmental Impact Report (Draft EIR) for Los Angeles (LA) County's Revised Oil Well Ordinance (ROWO) (Project).

CalGEM Authority

CalGEM is submitting comments as a Responsible Agency under the California Environmental Quality Act (CEQA). (Pub. Resources Code [PRC], § 21069; Cal. Code Regs. [CCR], Tit. 14, §§ 15096, 15381.) CalGEM, in its capacity as Responsible Agency, has jurisdiction over the drilling, operation, maintenance and plugging and abandonment of oil and gas wells and the operation, maintenance, removal, and abandonment of attendant production facilities within the State of California. (PRC, §§ 3013, 3106.). In addition to all other applicable requirements, operators must receive CalGEM's prior written approval to drill, rework, or plug and abandon a well. (PRC, §§ 3203, 3229.)

Project Description Summary

The Draft EIR analyzes and addresses potential environmental effects associated with the implementation of the Project, which would involve amendments to the LA County Code and LA General Plan, with the goal of prohibiting new oil and gas production and phasing out existing oil and gas activities, removal of associated industrial infrastructure, and restoration of well sites.

The Project is not site-specific but a countywide regulatory framework with specific areas of applicability that include unincorporated LA County, the Baldwin Hills

Community Standard District (CSD), and the Newhall Ranch. As described in Section 1.3 Project Location:

- **Countywide Applicability:** The proposed amendments to Titles 12 and 22 of the Los Angeles County Code will apply to all unincorporated areas of Los Angeles County, except for those lands located within the California Coastal Zone. The unincorporated areas total approximately 2,656 square miles and includes a wide spectrum of landscapes, including dense urban neighborhoods, suburban and rural communities, agricultural lands, and sensitive natural habitats in mountain and desert regions.
- **Baldwin Hills Community Standards District (CSD):** A primary component of the Project involves targeted amendments to the Baldwin Hills CSD. This is an existing regulatory overlay district established to provide specific operational controls for oil and gas activities within the Inglewood Oil Field, one of the largest urban oil fields in the United States. The CSD is in the west-central portion of Los Angeles County, bordered by urban communities and the Kenneth Hahn State Recreation Area.
- **Newhall Ranch Specific Plan:** The Project also includes amendments to the Newhall Ranch Specific Plan. This large-scale master-planned community is in the northwestern portion of Los Angeles County in the Santa Clarita Valley. The amendments are designed to align the Specific Plan with the new countywide regulations by phasing out existing oil extraction activities within its boundaries and prohibiting new oil and gas wells.

Future project-specific development and redevelopment are not included in the Draft EIR analysis and may be subject to environmental review pursuant to CEQA. Ultimately, the Draft EIR discloses the effects of broad policy change, aiding decision makers and the public in understanding the environmental implications of regulatory program design and providing program-wide mitigation measures.

Comments

Draft EIR – Generally Orphan and Idle Wells

The Draft EIR discusses the management and abandonment of orphan and idle wells throughout the document. While CalGEM's requirements with respect to these wells are generally accurately stated, CalGEM believes that it would be helpful to add clarifying language that addresses CalGEM's own authority to undertake their plugging and abandonment. More specifically, pursuant to PRC section 3226, CalGEM may choose to plug and abandon a deserted well or decommission a deserted production facility, but it is not statutorily obligated to do so. CalGEM shares LA County's goal of maximally protecting public health, safety, and the environment. Towards that end, leveraging state and federal funds, CalGEM implements the State's Project Plug Program. As part of this program, CalGEM developed a methodology to screen, rank, and prioritize

California's more than 5,300 orphan, deserted, and potentially deserted wells to be permanently plugged and sealed. Accordingly, CalGEM recommends that the Draft EIR acknowledge that the party responsible is the operator of record, as reflected in CalGEM's Well Statewide Tracking and Reporting System (WellSTAR).

Draft EIR – Generally Idle Wells; ROWO – Page 31, Definition of “Idle Well”¹

CalGEM notes that in Section 18 of the ROWO, “idle well” is defined as “[a]ny well that has not produced oil or gas or has not been used for injection for six consecutive months of continuous operation during the last five years or more years.” This definition differs from the state's definition of an idle well under PRC section 3008, subdivision (d):

[A]ny well that for a period of 24 consecutive months has not either produced oil or natural gas, produced water to be used in production stimulation, or been used for enhanced oil recovery, reservoir pressure management, or injection. For the purpose of determining whether a well is an idle well, production or injection is subject to verification by the division. An idle well continues to be an idle well until it has been properly abandoned in accordance with Section 3208 or it has been shown to the division's satisfaction that, since the well became an idle well, the well has for a continuous six-month period either maintained production of oil or natural gas, maintained production of water used in production stimulation, or been used for enhanced oil recovery, reservoir pressure management, or injection. An idle well does not include an active observation well.

Accordingly, under the state's definition, a well that has intermittent production or injection over a two-year period is treated as “active” by CalGEM. However, the Draft EIR references idle wells in connection with CalGEM's oversight of such wells, without explaining the difference in definitions. This is likely to cause confusion. Therefore, CalGEM recommends either explaining the difference in the Draft EIR or otherwise modifying the definition in the ROWO to be consistent with PRC section 3008, subdivision (d).

ROWO – Page 36, Number 5 ¹

Section 18 of the ROWO includes discussion of the CSD. The CSD has an expected timeline of three years for the plugging and abandonment of wells adjacent to a state recreation area or state park and is located, in whole or in part, within the boundary of the Baldwin Hills Conservancy. CalGEM recommends including an analysis of how LA County will achieve this goal.

Conclusion

CalGEM appreciates the opportunity to comment on the Draft EIR to assist LA County in identifying and mitigating the Project's impacts. We look forward to further coordination

¹ Note, the Draft ROWO version cited is the August 2026 Draft Ordinance posted on August 2026.

to ensure CalGEM can rely on this document in accordance with the law and consistent with its Responsible Agency responsibilities. Questions regarding this letter and further coordination should be directed to Jan Perez, CalGEM CEQA Program at Jan.Perez@conservation.ca.gov.

Sincerely,

Krysty Emery

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