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WATER OF CALIFORNIA

WATER RESOURCES CONTROL BOARD

In the Matter of Investigative Order No. R4-2026-0101 (Requirement for Technical Reports Pursuant to California Water Code Section 13267); The Petition of Temple Resources, LLC, a California limited liability company; Vida Resources, LLC, a California limited liability company; and Chaim Nathan, an individual Petitioners.	**SWRC File No._____** **PETITION FOR REVIEW AND REQUEST FOR STAY** **(Cal. Water Code § 13320; 23 California Code of Regulation § 2050 and 2050.5; 23 California Code of Regulations § 2053)**

INTRODUCTION

Pursuant to California Water Code section 13320 and California Code of Regulations ("CCR") Title 23, sections 2050 et seq., Temple Resources, LLC, a California limited liability company (“Temple”); Vida Resources, LLC, a California limited liability company (“Vida”); and Chaim Nathan, an individual; They are referred to collectively as ("Petitioners") respectfully seek review of Investigative Order No. R4-2026-0101, "Requirement for Technical Reports Pursuant to California Water Code Section 13267," issued by the California Regional Water Quality Control Board, Los Angeles Region ("Regional Board"), together with its transmittal cover letter of the same date. (A true and correct copy of the Order and cover letter is attached as Exhibit A.)

1. NAME AND ADDRESS OF PETITIONER

Petitioners may be contacted through counsel: Mike Montes Jr., Esq. (SBN 215022) Montes & Associates 12520 Magnolia Blvd., Suite 210, Valley Village, CA 91607 Telephone: (213) 353-9416 Email: mmontes@mmonteslegal.com.

2. THE DATE OF THE REGIONAL BOARD'S ACTION

The Order is dated September 11, 2026, and was signed that day by Russ Colby, Assistant Executive Officer. It was transmitted under a cover letter of the same date addressed to Mr. David Nathan at Temple Resources, LLC and to Mr. Chaim Nathan at Vida Resources, LLC, by certified mail, return receipt requested.

This Petition is submitted on October 10, 2026, and is therefore submitted to the State Water Board within 30 days of the Regional Board's action as required by Water Code section 13320, subdivision (a), and 23 Cal. Code Regs. section 2050, subdivision (a).

3. THE MANNER IN WHICH PETITIONER IS AGGRIEVED

The Order names each Petitioner as a discharger, directs them to prepare and submit a Site Assessment Work Plan by December 10, 2026 for a subsurface investigation that "shall vertically and horizontally delineate the extent of the discharges of oil in soil and soil vapor," and states that the required technical report "may cost in the range of $50,000 to $150,000, depending upon the number and depths of sampling locations." The Order violation states that failure to submit the report is a misdemeanor under Water Code section 13268, subdivision (a), and may result in administrative civil liability of up to $1,000 per day under subdivision (b)(1), "without further warning." It also requires that the report carry a perjury statement signed by a senior company representative. The Order further places Petitioners in the Regional Board's cost recovery program, exposing them to the Regional Board's oversight costs.

The Order was issued without prior notice to any Petitioner, without a draft for

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comment, and without any opportunity to be heard.

Each Petitioner is aggrieved in a distinct manner as set forth below.

Temple is named in Finding 5.a on the basis of its ownership and operation of the well from June 1, 2022, a finding that extends through a period during which the State, not Temple, controlled the Site.

Vida is named in Finding 5.b, and Mr. C. Nathan individually in Finding 5.c, on the basis of the 2016 and 2018 Notices of Violation, violations CalGEM confirmed in writing had been corrected, by letters dated April 15, 2019 and June 7, 2019. Mr. C. Nathan is additionally aggrieved because the Order threatens to impose criminal and civil liability on him personally rather than on an entity.

4. STATEMENT OF FACTS

A. The Site and the Prior Releases, Remediated and Closed

It is undisputed that the Site is a residential parcel at 314 Firmin Street, Los Angeles (AIN 5160-022-021), improved with a single-family dwelling at 314 and a duplex at 316/318. Behind the residences stood a single oil and gas well, "Patel 2" (API No. 0403718961), and a two-tank production facility within an engineered secondary containment barrier in one of the oldest oil fields discovered in the state.

The Site's regulatory history begins long before any Petitioner took possession and control of this asset. On November 21, 1969, the City of Los Angeles Office of Zoning Administration issued its determination in Z.A.I. Case No. 2729-O, authorizing the continued maintenance of two nonconforming oil wells and a tank on Lots 8 and 9, Block 26 of Park Tract, at 314-324 Firmin Street. The determination's first finding of fact records that "[t]he involved oil wells were drilled approximately 70 years ago prior to any zoning regulations and probably before residential development in the area in question," and that "[t]he non-conforming status of the wells was established in 1934 by Affidavit No. 253 presently on file in the Department of Building and Safety." Seventy years before 1969 is approximately 1899, consistent with the January 1, 1903 wellbore spud date in CalGEM's WellSTAR record. The same finding records that, as of 1969, "[o]il

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production has been temporarily suspended because of a leak in the storage tank." (A copy of the determination is attached as Exhibit U.)

Condition 4 of that determination prescribed how the tank containment area was to be surfaced. It required "that all oil waste material and debris be removed from the sump area between the tank and fire wall and that a 4 inch layer of crushed rock or sand be placed in the area between the tank and fire wall so as to permit the absorption of any spilled oil." The City of Los Angeles, in other words, directed that the ground inside the tank containment be left permeable and absorptive, by design, and for the express purpose of absorbing spilled oil. That condition governed this Site from 1969 onward to the present.

The City revisited the Site sixteen years later. In Case No. ZA 85-1343(NC), on the application of Balubhai Gopalji Patel, (the operator for whom the Patel lease is named after), the Office of Zoning Administration prepared a staff report dated January 30, 1986 on the continued maintenance and operation of the same two wells and tank on the same lots. That report records the physical condition of the Site as the City's own analyst found it. As to the tank, it states: "The tank, which is approximately 5 feet in diameter and 7 feet high, is surrounded by a 3-foot cement wall with a 4-foot chain link fence fixed atop the wall." As to the ground, it states: "The back yard of the subject property where oil well No. 2 and the tank are located is neither paved or maintained." (A copy is attached as Exhibit V).

In finding 3.a of ther Order being petitioned herein On June 13, 2016, CalGEM (then the Division of Oil, Gas, and Geothermal Resources) inspected the lease, and on June 21, 2016 it issued a Notice of Violation to Vida Resources, LLC. In the Order's own Finding 3.a describes what CalGEM saw: "oil-impacted soil within the tank containment area around both the wash and crude tanks, and around drums stored to the south of the crude tank." That is soil inside the secondary containment, by the Regional Board's own characterization. On February 16, 2018, CalGEM issued a further Notice of Violation (V118-00036 & V118-0037) concerning a spill of approximately 30 barrels

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reported on or about September 26, 2017.

Those violation were cleared under CalGEM's supervision. CalGEM's November 4, 2017 site visit, the source of the photographs the Regional Board reproduces as Attachment 3 to the Order, was conducted by DOGGR engineer Michael Cannon to investigate the reported spill. The photographs themselves depict hand excavation within the Tank No. 1 secondary containment and record that approximately 200 bags of impacted soil had already been removed. Waste from the Site was manifested for off-site disposal in the same period. Uniform Hazardous Waste Manifest No. 004810898 SKS, signed by the generator on December 28, 2017, records the shipment of seven drums containing 3,200 pounds of non-RCRA hazardous waste liquids described as "oil sludge and water" from Vida Resources, LLC at 314 Firmin Street, transported by Safety-Kleen Systems, Inc. and Clean Harbors Environmental Services, Inc. to Clean Harbors of Buttonwillow, 2500 Lokern Road, Buttonwillow, under management method code H132. The generator's own waste report for 2017 through 2020 records that shipment and no other. (The manifest and waste report are attached as Exhibit H).

CalGEM conducted follow-up inspections and closed the violations in writing. DOGGR engineer Max Chavez-Segura reinspected on September 6, 2018; engineers Ellen Plaza Moser and Stacy Sor reinspected on March 12, 2019; and engineers Stacy Sor and Eric Zimny reinspected on March 21, 2019, that last inspection having been conducted at the request of Chaim Nathan, Vida's manager and member.

By letter dated April 15, 2019, signed by Suman Ghosh, Environmental and Facilities Unit Supervisor, CalGEM acknowledged that "violations #V116-00207 through V116-00213, and V118-00037 specified in DOGGR NOVs dated June 21, 2016 and February 16, 2018, have been corrected," and that violation No. V116-00214 "has been annulled." (A copy is attached as Exhibit D).

CalGEM closed the remaining items not resolved in the prior letter on June 7, 2019. By letter of that date, also signed by Mr. Ghosh, CalGEM reported follow-up inspections conducted by engineer Eric Zimny on May 10 and May 31, 2019 and stated

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that "the previously identified **violations have been corrected and no new violations were observed** during the most recent inspection." (A copy is attached as Exhibit E).

The June 7, 2019 letter also set out what CalGEM required before the production facilities could be returned to service. The first of its three conditions was "[r]epairing the damaged (i.e. cracked) secondary containment," with reference to 14 Cal. Code Regs. section 1773.1; the other two concerned tank thickness testing and in-service notification and testing requirements. That directive, and the work done in response to it, are the reason the containment at this Site was rebuilt rather than the one described in the 2016 Notice of Violation.

On December 3, 2019, CalGEM personnel observed a crew pouring a new tank pad. By memorandum dated December 18, 2019, CalGEM Engineer Max Chavez-Segura documented that Wash Tank 1 had been returned to service "on the new cement foundation within the secondary containment," with a newly poured pad around it. The rebuilt containment consists of a reinforced concrete base and a sealed sump. The Regional Board's own photographs of December 8, 2025, taken after the tanks were removed, confirm the result: they show the containment floored in concrete, with the circular tank pad intact and the sump set within the concrete. The result is documented in CalGEM's own photographs of that period. Three photographs taken by DOGGR personnel at the Site on December 18, 2019 at 10:41 a.m., annotated "DOGGR, DoC, Los Angeles, Dec 18, 2019" and bearing embedded location data on the parcel, show the tank containment floored wall to wall in newly placed concrete, the wash tank standing on a raised circular concrete pad, and the concrete floor meeting the cinderblock containment wall in a sealed joint. (They are attached as Exhibit I).

The present Order states that "[a]ctivities at the Site included prior operations of a former single oil and gas well and associated tank facility from January 1977 through December 2025." That chronology is inaccurate and not a full operational history of this location. CalGEM's WellSTAR database, the same database the Order cites in footnote 5 to identify the operator, records a spud date for Patel 2 of January 1, 1903, with an

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initial date of production of February 28, 1979. January 1977 corresponds to neither; it reflects the period for which production reporting to the State is available, not when operations began. (A copy of the WellSTAR well detail is attached as Exhibit T).

The significance is that Operations at this location span approximately 122 years. Mr. Nathan held title from 2011, Vida from 2018, and Temple from 2022, together, the final fifteen years of that span. The current Order requires Petitioners to delineate soil and soil vapor at a location worked by operators across twelve decades, none of whom is before the Regional Board existence, and offers no basis on which any impact found could be assigned to the years Petitioners held an interest. The Regional Board's own files explicitly acknowledge the pervasive nature of the problem: the Avocet report prepared for Case No. 1359 attributes petroleum-impacted fill within this oil field to historical operations dating back a century.

This Avocet report documents the environmental assessment of the former "abandoned oil and gas Well L.A. 1," located at 806 North Beaudry Avenue in Los Angeles, California—just 0.4 miles away from the subject property and within the same referenced oil field. The site, an approximately 0.12-acre lot in a residential neighborhood, was acquired by the California Department of Conservation (DOC) in 1992. The DOC operated two oil production wells (L.A. 1 and L.A. 2) and related infrastructure there until 2005, when the wells were plugged and the facilities permanently abandoned.

Crucially, Dr. Suman Ghosh was a recipient of both key pieces of correspondence regarding this site:

1. The Avocet Assessment Report: Dr. Ghosh was carbon-copied on this initial report, alongside Mr. Jeffrey Hu of the Los Angeles Regional Water Quality Control Board (LARWQCB), and CalGEM employees Mr. Brady Van Engelen, Mr. Daniel Dudak, and Mr. Chris McCullough.

2. The CalGEM Referral Letter: On November 3, 2025, the California Geologic Energy Management Division (CalGEM, formerly DOGGR) formally referred

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the matter to the Regional Board. The referral stated that CalGEM "does not have the expertise or practice of soil and/or groundwater contamination investigation and/or remediation," and requested that the Regional Board "investigate the site and instruct the operator." Dr. Ghosh was once again carbon-copied on this referral.

The Order's site-description paragraph states that "[a]ctivities at the Site included prior operations of a former single oil and gas well and associated tank facility from January 1977 through December 2025." January 1977 is not when operations began. It is approximately when production reporting to the State begins in the regulatory record. CalGEM's own WellSTAR entry for Patel 2 records a wellbore spud date of January 1, 1903 and an initial date of production of February 28, 1979, neither of which is January 1977. (A copy of the WellSTAR record is attached as Exhibit T).

The distinction matters to what this Order requires. Petitioners' combined connection to this Site begins on February 14, 2011, the first ownership date the Order itself identifies. On the Order's own frame, operations at the Site ran for thirty-four years before that date, and on CalGEM's record the well has existed for more than a century.

The Order requires Petitioners to "vertically and horizontally delineate the extent of the discharges of oil in soil and soil vapor" at a well site whose operational history is overwhelmingly attributable to persons who are not before the Regional Board, and it requires no means of distinguishing their contribution from Petitioners'.

B. The 2025 Inspection and CalGEM's Referral

On August 26, 2025, Los Angeles Fire Department Inspector John Davis reported to CalGEM what he described as a possible unreported spill onto the unpaved area surrounding the tank farm, and provided undated photographs and a video from an anonymous source. CalGEM inspected the following day. CalGEM's referral letter reports the result in a single sentence: "We did not observe evidence of the oil in the area as Inspector Davis described due to a healthy growth of vegetation in the area." In the Order's own Finding 3.d puts it as "CalGEM was unable to verify some of LAFD's observations during its inspection." No agency has ever confirmed that the spill

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Inspector Davis reported occurred. CalGEM observed "older and saturated oil-stained soil" around four plastic clarifiers and "an active fluid drip" from connected piping. CalGEM's own Phase 2 Findings Report locates those clarifiers "within the crude oil tank secondary containment unit." That drip was repaired following CalGEM's September 4, 2025 Notice of Violation.

The clarifiers CalGEM observed were treatment equipment, not storage.

Produced fluid from the well passed through a three-stage clarifier train, which separates entrained oil from produced water, and the treated water then passed through a line to a sample box. The "active fluid drip from the piping connected to these containers" that CalGEM observed, and what the Order repeats at Finding 3.d, was a drip from that line, treated produced water on its way to the sample point, not crude oil. CalGEM's own referral letter describes it as a "fluid drip," not an oil drip, and records that "[t]he drip was later fixed after we issued a violation."

Petitioners had that water analyzed, on their own initiative and before any of the events giving rise to this Order or violation. A complete water analysis of a sample taken at the Patel 2 sample point on October 12, 2023 was performed by Pacific Coast Area Laboratory and reported on November 15, 2023. The analysis reports that no lead was detected, nickel was not detected, aluminum, chromium, cobalt, copper, molybdenum, tin, titanium, vanadium and zirconium each were not detected, iron at 1.3 milligrams per liter, manganese at 0.1, and zinc at 0.1. Aqueous hydrogen sulfide and aqueous carbon dioxide are each reported not detected, as are all five organic acids on the panel. (A copy is attached as Exhibit Y).

The referral letter reproduced two sets of photographs, and CalGEM distinguishes between them. The first set is captioned "Selected Undated Photographs provided by Inspector Davis (LAFD)."

CalGEM itself records that those photographs bear no date. They are of Temple's agent in plain clothes standing and crouching at the outside of a chain-link perimeter fence amid heavy vegetation, with a parked car behind him, and a close view

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of dark ground along a fence line among weeds and construction debris. Nothing in them identifies when they were taken, by whom, or from where.

The second set is captioned "CalGEM Photographs of Oil-Stained Soil, August 27, 2025," and those images carry burned-in timestamps of 11:43:51, 11:44:34, and 11:44:45 a.m. on that date with compass bearings. They show the clarifiers and their piping standing against a concrete block containment wall, with a concrete curb in the frame, and they show grass and weeds growing densely through the ground surface the Regional Board characterizes as "saturated oil-stained soil." The photographs the Regional Board relies on for Finding 3.d are therefore photographs of the ground inside and immediately against the containment structure, supporting live vegetation.

On November 3, 2025, CalGEM referred the matter to the Regional Board, stating that CalGEM "does not have the expertise or practice of soil and/or groundwater contamination investigation and/or remediation," and asking the Regional Board to "investigate the site and instruct the operator."

The Los Angeles Fire Department dismissed the violation it had issued for the Site. On December 2, 2025, counsel for Petitioners wrote to Assistant Fire Marshal Barry Belknap of the Department's Certified Unified Program Agency concerning the claimed "threatened or reportable" release. On December 3, 2025, Inspector II David G. Flynn of the CUPA Section replied: "[W]e have had significant discussions amongst our peers and experts as well as research into the matter. Following our review, we determined that the available documentation and observations do not provide sufficient support of a violation. As a result, enforcement will not move forward at this time. The violation has been dismissed in CERS as of 12/02/2025." (The correspondence is attached as Exhibit N). This Order does not mention it.

Finding 3.d states that the LAFD inspector "provided CalGEM a video from an anonymous source showing an onsite tank overflowing with fluids and spilling out the top and running down the side of the tank." That video was produced to Petitioners by the Regional Board on October 2, 2026, in response to a Public Records Act request. It

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is a 10.7-second clip, 320 by 240 pixels, filmed vertically on a handheld telephone from outside the Site's perimeter, through chain-link fencing topped with barbed wire. It bears no author, no location data, and no recording date. The Order neither attached the video nor described its probative, and Petitioners had never seen it before October 2, 2026.

On May 17, 2024, a tenant at the property recorded the tank farm and sent the recordings to Temple's managing member; those recordings carry embedded creation times of 6:17 p.m. that day and location data placing the camera on the parcel. Temple's managing member immediately returned to the property upon receiving them. Separately, fixed-camera footage from the property bearing burned-in timestamps running from 11:59:22 a.m. to 12:00:42 p.m. on May 30, 2024 shows uniformed Los Angeles Fire Department personnel at the tank farm gate with an emergency vehicle behind them. The Fire Department issued no citation to Temple arising out of either date.

Taken entirely at face value, the video does not depict a discharge to the environment. The Order describes it as showing "an onsite tank overflowing with fluids and spilling out the top and running down the side of the tank." The tanks stood inside the secondary containment wall. The Order says so in its own site description: "The tank battery was surrounded by secondary containment and concrete foundations and flooring." Fluid running down the side of a tank that stands within a bermed, concrete-floored containment structure runs onto the containment floor. That is the purpose the structure exists to capture. The Regional Board's own characterization of the video therefore describes a release into engineered containment, not a discharge of waste to land or to waters of the state, and the Order draws no distinction between the two.

The Los Angeles Fire Department's own hazardous materials unit later placed the same incident in 2024. On October 22, 2025, the unit cited Temple for a Class I violation for failing to report a release and emailed Temple video footage of the claimed release that afternoon. On October 24, 2025, the inspector wrote that Temple "will need

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to submit a retroactive report of release to CalOES for the incident that occurred last year." The unit pressed for that report again on November 18 and December 2, 2025, and then dismissed the violation on December 2, 2025, its inspector confirming that the documentation and observations did not sufficiently support it.

C. The State Took Adverse Possession of the Site and Performed the Work Itself

On December 3, 2025, CalGEM and its contractor Driltek, Inc. entered the Site without permission and excluded Temple from it. CalGEM's counsel notified Temple's counsel the same morning that CalGEM "will be entering the premises of 314 Firmin St. today to perform the work contemplated by Order No. 1422, pursuant to authority under Public Resources Code section 3226." The entry occurred without a warrant, without Temple's consent, and thirty-six days after the Superior Court denied a preliminary injunction to compel the work.

Between December 3, 2025 and mid-January 2026, the State and its contractor drained and removed the tanks, demolished the secondary containment and the tank pads, removed the production equipment, plugged and abandoned the well, and graded the Site. The Regional Board's own Attachment 2 to the Order documents the result: a photograph captioned as showing conditions "prior to well sealing and facilities removal" depicts an intact, fenced tank battery; a photograph captioned "following well sealing and facilities removal as of January 15, 2026" depicts the same ground scraped to bare earth, covered in heavy-equipment tread marks, with a mound of rubble remaining.

Photographs taken by CalGEM's own Engineering Geologist, Stephen O'Farrell, P.G., during those operations record the conditions the State created.

A photograph taken January 6, 2026 at 8:10 a.m. shows demolished concrete and cut pipe staged directly on wet, unpaved soil with no liner, and plastic sheeting discarded into the open wellhead excavation.

Photographs taken January 8, 2026 at 9:05 a.m. and 9:51 a.m. show the work string entering fluid pooled in an unlined excavation at the wellhead, with orange-brown

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emulsion, black oily fraction, sheen, and bubbling, and an oil-coated sludge mound against broken concrete. Driltek's daily report for that date records cement returns to surface that morning; CalGEM's own evening summary records that a "[v]ac truck removes fluid from well 'cellar.'" No volume, characterization, or disposal record for that fluid appears in the record produced to date. (Copies of the photographs, are attached as Exhibit L).

D. The Regional Board Declined to Sample While the State Controlled the Site

The Regional Board was aware of the State's operations throughout. It received the Site Stabilization Plan and CalGEM's Phase 2 Findings Report on October 28, 2025, and CalGEM's referral letter on November 4, 2025. Its staff conducted a site walk on November 24, 2025, and its own December 8, 2025 letter records that "Los Angeles Water Board staff were unable to enter the property but observed the Site from the street," where "[t]he oil derrick was observed to be active." In reference to an active pumpjack.

On December 8, 2025 the Regional Board set out, in writing, what it wanted done about this Site and it directed that request to CalGEM, not to Petitioners. Its letter of that date to CalGEM project manager Neda Tafi found the Site Stabilization Plan's "procedures are sound, and adequate controls are in place to contain an unexpected release to the environment during plugging and abandonment." Under the heading "To support the effort to investigate the Site," the Regional Board then requested that CalGEM provide four things: at least six soil samples collected during demolition "beneath and around the tank containment and in areas of oil-impacted soil as noted in the NOVs," of which two were to be taken "beneath the tank containment"; analysis of those samples for total petroleum hydrocarbons and volatile organic compounds; notification to the Regional Board "at least 14 days prior to demolition and well abandonment," with a request to "discuss sampling strategy"; and the laboratory reports and scaled sample-location maps "within 30-days after the samples are collected." (A

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copy of the letter is attached as Exhibit J).

That request describes a complete soil investigation of this Site, sample count, sample locations, analytical suite, notification, and deliverables, to be performed by the State during an operation the State was already conducting and, at no cost to Petitioners. It is the investigation the Regional Board itself designed and Nine months later the Regional Board ordered Petitioners to design and pay for the same investigation!

The request was not honored. Driltek replied the same evening that "[t]he facilities at the site have been removed and we are set to start the well abandonment tomorrow." The fourteen days' notice the Regional Board had asked for was, by then, impossible; the facilities were already gone, and they were the ones to cause any environmental damage.

Regional Board staff were on the Site that same day. A trip plan signed by Kevin Tomita, P.G., Engineering Geologist and Acting Unit 3 Supervisor, at 9:55 a.m. on December 8, 2025 records a visit to 314 Firmin Street, departing at 10:30 a.m. and returning at noon, with a single staff member traveling and with "Potential heavy equipment in use" noted as an anticipated site condition. The only site contact identified on the form is Neda Tafi of CalGEM. No Petitioner is named on it.

Mr. Tomita photographed the Site between 10:47 and 10:49 a.m. that morning. Eight photographs, with embedded location data placing the camera within approximately 15 to 25 meters of the wellhead, record the condition of the Site after the facilities had been removed and before well abandonment began the following day. They show the tanks gone; the secondary containment stripped to its concrete floor, with the circular tank pad still in place and the containment walls partially demolished; the wellhead standing in a wire enclosure strung with caution tape; a telehandler working on bare graded soil; and demolished concrete and steel debris staged directly on unpaved ground. (Copies, are attached as Exhibit N-4).

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No samples were collected. On December 9, 2025, Regional Board staff asked CalGEM directly, "Are you able to have staff collect soil samples?" CalGEM's project manager declined, responding that "this project is not a state abandonment of an orphan well, it is an enforcement action over an active operator. Please work directly with the operator for any sampling requirements," and supplying Temple's contact information.

The Regional Board did not then contact any Petitioner. It made no contact of any kind with Temple Resources, LLC, Vida Resources, LLC, Chaim Nathan, or David Nathan at any time between CalGEM's referral and the issuance of the Order nine months later.

E. The Regional Board's Own Records Do Not Support a Groundwater Threat

The Order identifies no groundwater data for the Site. It states no depth to groundwater, identifies no receiving water, cites no Basin Plan beneficial use designation, and describes no pathway. CalGEM's own environmental scientist reported on October 2, 2025 that he "could not find any regulatory record of this site on the publicly facing Waterboard's GeoTracker website" and that the Site "does not appear as a mapped site in their public database."

The Regional Board's own files indicate the contrary of what the Order assumes. In Site Cleanup Program Case No. 1359, concerning abandoned Well L.A. 1 at 806 North Beaudry Avenue, the Regional Board's Site Cleanup Program received the Well L.A. 1 Assessment Report dated April 17, 2019, prepared by Avocet Environmental, Inc. for the California Department of General Services, Real Estate Services Division, and submitted to Regional Board Engineering Geologist Nicole Alkov. https://geotracker.waterboards.ca.gov/profile_report?global_id=T10000008461

That site, and this one, share a geologic setting and an existing oil field. Both lie in the Elysian Hills, underlain by the Puente Formation, within the Los Angeles City Oil Field. The Avocet report states that "[t]he bedrock underlying the Elysian and Repetto

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Hills is generally considered to be non-water-bearing with groundwater limited to laterally discontinuous, thin, perched lenses," citing the California Department of Water Resources. And Avocet's own borings bear that out. Water was encountered in weathered and fractured bedrock at 20 and 26 feet below grade in one boring and at 22 and 25.5 feet in another, rising in temporary wells to 14 and 16 feet. Both Avocet and the prior consultant interpreted that water as "transient perched water trapped in fractures in the weathered, low-permeability bedrock," attributable to infiltration of seasonal precipitation and irrigation from uphill properties, and "limited in areal extent and not likely to be part of a more extensive groundwater reservoir with beneficial uses." Grab samples analyzed for total petroleum hydrocarbons and volatile organic compounds returned results "either nondetectable or very low (i.e., less than drinking water standards)."

The report's recommendation followed from that. Notwithstanding that crude oil was encountered at 28 feet below grade in one boring, Avocet concluded: "Given the current site use, the low threat posed by the petroleum hydrocarbons, and the absence of a local beneficial groundwater resource, no further delineation, characterization, or remediation is recommended or warranted." The Regional Board's Site Cleanup Program received that report and the case has remained in its files since.

The Avocet report also addressed methane, and the Regional Board accepted its conclusion. Methane concentrations in soil gas at that site ranged from 2,000 to 7,000 parts per million by volume. To determine whether the abandoned well was the source, three leak tests were run on October 29, 30, and 31, 2018: FLIR infrared inspection of the wellhead, which detected no anomalous emissions; submersion of the wellhead in water within a sealed tube, which produced no bubbles over fifteen minutes; and overnight encapsulation of the wellhead in a sealed shroud. The shroud accumulated methane, but when the same shroud was sealed on exposed bedrock roughly four feet away from the wellhead, it accumulated "near equivalent methane concentrations."

Avocet concluded that "the methane is reaching the shallow subsurface through

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porosity and/or discontinuities in the bedrock and not through or around the well casing," and that the concentrations measured were "likely a reflection of the site's location within an active oil field."

The report records what the Regional Board did with that conclusion: "In an email dated October 31, 2018, the LARWQCB accepted DOC's conclusion that leakage from Well L.A. 1 is not responsible for the elevated methane concentrations." The report further notes that "[t]he existence of an elevated methane flux is well documented in the LACOF, as evidenced by the City of Los Angeles' designation of the site area as a methane zone subject to methane testing and, if necessary, methane mitigation," and that "[t]he methane zone is roughly defined by the boundaries of the LACOF, and the oil field is considered to be the source of the methane."

Most notably the Site was acquired by the State of California, Division of Oil, Gas, and Geothermal Resources (DOGGR) in 1992, which until 2005, featured two oil production wells and related support infrastructure, including indications of an underground storage tank (UST) used to store oil onsite.

This Site lies within that same designated City of Los Angeles methane zone. The City's Zone Information and Map Access System identifies the parcel, AIN 5160-022-021, as a "Methane Hazard Site, Methane Zone." (A copy of the ZIMAS report is attached as Exhibit R).

The same record bears on attribution in a second way. ZIMAS associates two well numbers with this parcel, API Nos. 0403718961 and 0403725755, and records "Oil Well Adjacency: Yes," with idle wells within 200 feet and plugged wells within 100 feet. The Order describes the Site as having had "a former single oil and gas well." Whatever the correct count on this parcel, this Order requires delineation of soil and soil vapor impacts at a location surrounded, within 100 to 200 feet, by other wells of other operators from other areas, and requires no background sampling, no off-parcel comparison, and no means of distinguishing their contribution from Petitioners'activities.

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The contrast with this Order is direct. At a comparable site in the same field and the same formation, where crude oil was actually found in the subsurface, the Regional Board accepted that the absence of a beneficial groundwater resource made further delineation unwarranted. Here the Regional Board has ordered full vertical and horizontal delineation on the stated ground that it is "necessary to protect groundwater quality," without a single groundwater baseline for measurement of any kind.

5. REASONS THE REGIONAL BOARD'S ACTION WAS INAPPROPRIATE, AND POINTS AND AUTHORITIES

A. The Order Does Not Satisfy Water Code Section 13267(b)(1)'s Written-Explanation Requirement

Section 13267(b)(1) permits a regional board to require technical reports from a person who has discharged, discharges, or is suspected of discharging waste that could affect water quality. The authority is conditioned: "The burden, including costs, of these reports shall bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports."

This Order's explanation of need rests entirely on groundwater: "The information is necessary to protect groundwater quality, which may be impacted from wastes discharged to soil as a result of the activities performed at the Site." No evidence supporting that statement is identified. This Order cites no groundwater sample, no monitoring well, no depth measurement, no Basin Plan designation, and no hydrogeologic analysis. "[M]ay be impacted" is a conjecture, not an identification of evidence.

B. The Reports Required Cannot Produce the Benefit the Order Claims

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The reasonable-relationship test is measured against "the benefits to be obtained from the reports." The Order requires a work plan for soil matrix analysis and soil vapor analysis. It requires no groundwater investigation of any kind. A work plan limited to soil and soil vapor cannot determine whether groundwater underlies the Site, at what depth, in what quality, or whether it has any beneficial use. The single benefit this Order identifies is therefore not a benefit these reports can deliver.

The mismatch is confirmed by the scope. The Order directs that soil vapor data be uploaded with "vapor intrusion building profile(s)," a human-health exposure pathway concerning indoor air in the residences, and the need paragraph closes by stating that "[t]hese activities all protect human health and the environment."

If the Regional Board's actual concern is vapor intrusion rather than groundwater, section 13267(b)(1) requires that the written explanation say so and identify the supporting evidence. This Order does neither.

The Regional Board's own files show it knows the difference. In Site Cleanup Program Case No. 1359, in this same oil field and this same formation, the assessment the Regional Board received concluded that the absence of a beneficial groundwater resource made further delineation unwarranted. This Order asserts a groundwater need it cannot support, and then orders soil vapor work it never justifies. Section 13267(b)(1) does not permit a regional board to state one justification and pursue another; the written explanation must address the reports actually required.

C. A Soil Vapor Investigation in This Oil Field Cannot Attribute What It Finds

The Order requires soil vapor analysis for volatile organic compounds and total petroleum hydrocarbons, and directs that the data be uploaded to GeoTracker with "vapor intrusion building profile(s)." The Site sits within the Los Angeles City Oil Field and within the City of Los Angeles methane zone that the Regional Board's own files describe as "roughly defined by the boundaries of the LACOF," with "the oil field … considered to be the source of the methane." Elevated soil vapor in this setting is the

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regional baseline condition. It is what the City's methane ordinances exist to address, and it is present whether or not any discharge ever occurred at a given parcel.

The scale of the field explains why.

The published account of the Los Angeles City Oil Field records that it was discovered in 1892, that within a few years "there were over 200 oil companies and 2500 wells within the city limits," and that as of 1913 the field encompassed roughly 380 acres of proved land with some 1,000 original wells, many since abandoned. The same account states that the field "continues to remain active today, albeit wells continue to be abandoned, and concerns regarding vapor migration creating a significant risk to public health, safety and welfare exist." It describes the present condition plainly: "Hydrogen sulfide and methane gas, derived from naturally occurring crude oil, occurs beneath portions of the city," and "the potential for gas migration to enclosed space presenting a potential hazard to public health, safety and welfare, remains." (A copy is attached as Exhibit W).

The clearest illustration lies a few hundred feet from this Site. The City's ZIMAS record identifies the Site as within a 500-foot school zone of the Edward R. Roybal Learning Center, the former Belmont Learning Center, at First Street and Beaudry Avenue. That project was halted in 1999 when methane and hydrogen sulfide were detected, including gas seepage in the main electrical vault room immediately before power was to be energized. The published account records that "[b]ecause a portion of the site is located within the boundaries of the Los Angeles City Oil Field, naturally occurring crude oil methane and hydrogen sulfide exist in the underlying soil and as soil gas"; that "gas seepage was encountered over most of the site"; that four operational wells stood on the northwest corner of the school property; and that hydrogen sulfide at depth was measured at concentrations over 3,000 parts per million. More than half the completed buildings were demolished, construction resumed in 2006, and the school opened in September 2008 at a total cost reported at roughly $400 million.

What the State ultimately did at that site is as instructive as what it found. The

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Department of Toxic Substances Control, responding to public comment on the Remedial Action Plan for Central Los Angeles High School No. 1, stated that a comprehensive characterization had established that soil conditions at the site posed no threat to public health or the environment, and that the selected remedy for the oil field gas was engineering control rather than soil removal. The remedy employs "gas venting and a membrane as the primary protection scheme", a high-density polyethylene membrane beneath the buildings with a redundant air sweep system below it, continuous monitoring under the membrane, automatic activation of the air sweep and building ventilation at ten percent of the lower explosive limit, and an alarm. In the open areas, "a large gas dispersion sand layer" was placed, with playfields built as eighteen inches of soil over eighteen inches of sand.

The parking structure at First and Beaudry has no subsurface piping or methane barrier at all; it relies on mechanical ventilation at six air exchanges per hour with continuous monitoring. DTSC recorded that methane is present in the subsurface across the site but "has not been detected at the surface," and that "[h]ydrogen sulfide has never been detected at the surface on the Site." The soil remained in place and the school was built above it.

The lesson of that episode is not that soil vapor is unimportant. It is that soil vapor in this field is a field-wide condition of the subsurface, documented across hundreds of acres and attributed to the oil field itself rather than to any discharger. The City addresses it through its methane ordinances and through engineered mitigation, which is why this site carries a methane zone designation.

A section 13267 order premised on a discharge by three named persons is not the instrument that distinguishes that condition from anything attributable to them, and this Order requires nothing that would.

The Regional Board has already accepted that reasoning once, in this field, on better facts than it has with this matter. At 806 North Beaudry Avenue it accepted that elevated methane was not attributable to the abandoned well, because bedrock four

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feet away from the wellhead produced near equivalent concentrations. A soil vapor investigation at this location, conducted without any background or off-parcel comparison, will return elevated readings and will not establish what the Order says the reports are for.

Reports that cannot distinguish a discharge from the regional condition do not deliver "the benefits to be obtained from the reports" within the meaning of section 13267(b)(1).

D. The Burden Does Not Bear a Reasonable Relationship to the Need

The Order estimates the required work at $50,000 to $150,000 and makes the upper bound open-ended by tying it to "the number and depths of sampling locations" while requiring that impacts be delineated "vertically and horizontally" without any stated limit.

The estimate is circular. The Order does not fix the number of sampling locations or their depths; it directs Petitioners to propose them in the Work Plan, subject to the Regional Board's approval, and reserves the right to "reject the work plan and technical report if they are deemed incomplete and/or require revisions." The Regional Board therefore priced a scope of work it had not defined, and then named the undefined scope as the variable that determines the cost. A range that spans a factor of three is itself an acknowledgment that the Regional Board does not know what it is requiring.

Nothing in the Order or in the record produced to date discloses how the figure was derived. No consultant quotation, no unit cost, no comparable-site estimate, or analysis of any kind is identified.

Section 13267(b)(1) does not merely require that a burden be reasonable in relation to the need; it requires the regional board to "provide the person with a written explanation with regard to the need for the reports" and to "identify the evidence that supports requiring that person to provide the reports." A regional board cannot weigh a burden it has not measured, and the Regional Board did not ask Petitioners at any point in the nine months between CalGEM's referral and issuance what the work would cost

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them or whether they could bear it. The Order recites the statutory conclusion that "[t]he burdens, including costs, of these reports bear a reasonable relationship to the need," and the recitation is the whole of the analysis.

The technical scope was not fitted to this location. The Order directs that samples be collected at "any former oil derrick, clarifiers, chemical storage areas, degreasers, plating lines, and sumps," and that soil be analyzed for heavy metals under the Regional Board's "General Work Plan Requirements for a Heavy Metal Soil Investigation."

Nothing in the Order, in CalGEM's referral, in the Phase 2 Findings Report, or in any other document in the record places a degreaser or a plating line at this two-tank oil lease. Degreasers, plating lines, and a heavy-metals work plan are the signature features of an industrial metal-finishing investigation, not oil wells.

Their appearance here indicates that the Order's technical requirements were drawn from a template rather than from the evidence concerning this Site. The heavy-metals requirement is justified in the Order by a footnote stating that "[c]rude oil naturally contains heavy metals, including nickel, iron, cadmium, and lead." Petitioners' own 2023 analysis of the produced water from this well reports “lead not detected” and “nickel not detected”, with iron at 1.3 milligrams per liter. The Regional Board had no site-specific data of any kind when it imposed that requirement, and the only site-specific data in existence does not support it.

The reasonable-relationship inquiry is also informed by what the Regional Board itself thought adequate. On December 8, 2025 the Regional Board specified the investigation it wanted: six soil samples at a minimum, two from beneath the tank containment, analyzed for total petroleum hydrocarbons and volatile organic compounds, with laboratory reports and scaled location maps to follow. It asked CalGEM to collect them during an operation the State was already performing.

Nothing in the record suggests the Regional Board then concluded that six samples were insufficient. What changed between December 2025 and September

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2026 was not the Regional Board's view of the technical need; it was who would bear the cost. An order that converts a six-sample request, declined by a sister agency, into an open-ended delineation obligation priced at $50,000 to $150,000 and borne by the party the Regional Board never contacted, does not bear a reasonable relationship to the need the Regional Board itself identified.

E. The Findings Concerning the 2016–2018 Releases Are Contradicted by the Regional Board's Own Cited Source

Findings 3.a, 3.b, and 4.a rest on the 2016 and 2018 Notices of Violation and on CalGEM's November 4, 2017 inspection photographs, and assert that remediation "had not been fully completed." The Regional Board's source for those findings is CalGEM's Phase 2 Findings Report, which attaches CalGEM's April 15, 2019 letter. The Order does not mention that letter's conclusion, and does not mention CalGEM's June 7, 2019 letter closing the remaining item.

The quoted phrase also does not mean what the Order uses it to mean. In CalGEM's Phase 2 Findings Report, as summarized in the Regional Board's own December 8, 2025 letter, the statement that "little cleanup activity had occurred and remediation of the spill had not been fully completed" describes what CalGEM found on two specific inspections, November 20, 2017 and February 14, 2018, and is the stated reason the February 16, 2018 Notice of Violation issued. It is a description of conditions as of February 2018, not a finding about any later date. CalGEM closed those same violations fourteen months afterward. The Order carries the phrase forward as though it described the location's condition at the time of the Order.

The record the Regional Board itself relies on shows sustained regulatory supervision through closure, not abandonment. CalGEM reinspected the lease on September 6, 2018, March 12, 2019, March 21, 2019, May 10, 2019, and May 31, 2019. It tracked each violation individually, closing most by April 15, 2019, annulling one, and identifying a single remaining item, the wellhead hole, which it then confirmed corrected

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on June 7, 2019. One of those inspections was conducted at the operator's own request.

An agency that annuls a violation, itemizes what remains, reinspects five times, and then issues a written closure is not describing remediation that "had not been fully completed."

Finding 4.a identifies two things in the November 4, 2017 photographs: "crude oil in soil as well as staining and accumulation of oil on a cinderblock wall at the Site." This Order's own caption to Attachment 3 locates both. It reads: "Hand excavation inside southwest corner of Tank No. 1 secondary containment area. Green arrows highlight crude oil staining and accumulation on cinderblock wall." The cinderblock wall is the secondary containment wall, and the staining the Regional Board relies on is staining on the inside face of a containment structure. Oil on the inner wall of secondary containment is not evidence that containment failed; it is evidence that containment worked. A structure built to hold released fluid will bear the marks of having held it.

The photographs on which Finding 4.a relies depict the remediation in progress, hand excavation within the containment, with approximately 200 bags of impacted soil already removed, not an abandoned release. The same inspection record shows that when CalGEM's engineer identified the wellhead leak that day, the operator shut the well down immediately.

F. The 2025 Findings Describe Conditions Within Engineered Secondary Containment, Not on Unpaved Ground

The unpaved condition of this ground is also documented half a century before any of the Petitioner’s held an interest in the site, at issue in this Order. The City's zoning analyst wrote in January 1986 that "[t]he back yard of the subject property where oil well No. 2 and the tank are located is neither paved or maintained." Finding 3.d treats an unpaved surface as though it were a condition Petitioners created. The City's own records show it as the Site's settled condition in 1986, and as a surface the City had affirmatively required in 1969.

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There is a further answer, and it comes from the City's own file. To whatever extent the ground inside the tank containment was unpaved and absorptive, that was a regulatory requirement, not a lapse by Petitioners. Condition 4 of Z.A.I. Case No. 2729-O directed that "a 4 in. layer of crushed rock or sand be placed in the area between the tank and fire wall so as to permit the absorption of any spilled oil." A permeable containment floor at this Site was the condition of the City's authorization to operate. Oil absorbed into that surface is the designed outcome of a condition the City imposed, and the Regional Board cannot treat the predictable result of a public agency's own operating condition as evidence of an unlawful discharge by the persons who complied with it.

The Order contradicts itself on this point within its own four corners. Its second finding paragraph describes the Site as follows: "The Site consisted of an oil and gas well and a two-tank processing battery. The tank battery was surrounded by secondary containment and concrete foundations and flooring." Finding 3.d then places the staining on "unpaved ground surface." Both sentences appear in the same document, four paragraphs apart, and they cannot both describe the same ground.

The Regional Board's December 8, 2025 letter to CalGEM says the same thing as the Order's site description: "The tank battery is surrounded by secondary containment and has some concrete foundations and flooring." The characterization the Regional Board adopted for its finding is the one its own site description contradicts.

Photographs taken by Regional Board staff on December 8, 2025, after the tanks were removed, show the secondary containment floored in concrete, with the circular tank pad in place and the sump formed within the concrete. The staining visible in those photographs lies on the concrete surface and on the containment wall, which is what secondary containment is built to do.

Finding 3.d rests on three supports, and each fails on the agencies' own records. First, Inspector Davis's report of a possible unreported spill onto the unpaved area has never been verified by anyone. CalGEM inspected the following day and wrote that it

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"did not observe evidence of the oil in the area as Inspector Davis described due to a healthy growth of vegetation in the area," and the Order itself states that "CalGEM was unable to verify some of LAFD's observations." An unverified report is not evidence identified under section 13267(b)(1), and it is the excuse an investigation was requested. Second, the video is undated in the Regional Board's copy, and depicts a condition the Fire Department's own hazardous materials unit placed in 2024, the unit having emailed Petitioner footage of the claimed release, demanded a retroactive report for "the incident that occurred last year," and then dismissed the violation it had built on that footage, again within the containment area designed to capture it, as depicted in the video. Third, the staining and the drip were within engineered secondary containment, and the drip was repaired following CalGEM's notice.

Dark soil at this location is not, without more, evidence of a recent discharge. The Regional Board's own file says so. The Avocet report in Site Cleanup Program Case No. 1359 records that in this oil field "the petroleum was limited to the artificial fill in the upper 4 to 12 feet of the site," that "it is generally accepted that the petroleum-impacted artificial fill is a result of oil field operations" of long standing, and that the deeper impacts match "natural bituminous oil sands and historical seeps."

The Los Angeles City Oil Field has been producing since before the turn of the last century, and CalGEM's own record places a wellbore at this Site in 1903. Discolored near-surface fill is the regional background condition in this field, and the Order offers no analytical result, no comparison to background, and no age-dating of any kind to distinguish background from a discharge attributable to Petitioners.

The photographs also record something inconsistent with the characterization placed on them. The ground the Regional Board describes as "saturated oil-stained soil" is shown supporting dense, living grass growing directly through it. That is visible in the Order's own Attachment 4: the photograph captioned "Oil stained soil below piping" encloses, within the Regional Board's own red annotation box, several clumps of green grass growing out of the surface it marks. It is the same vegetation CalGEM says

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elsewhere prevented it from verifying the LAFD inspector's observations. Attachment 5 is to the same effect: the photograph captioned "Hole in secondary containment wall for a pipe" shows a cinderblock wall, the "3-foot cement wall" the City recorded in 1986, with grass growing along its base, and the photographs captioned "Open buckets of oily fluid" and "Wellhead cellar contains fluids" show containers standing on a concrete surface and a formed concrete wellhead cellar respectively.

Finding 3.d closes with the statement that "the oil-stained soil still had not been cleaned up." That is the Regional Board's strongest sentence, and it is accurate as of November 3, 2025. It is also a condition the agencies themselves overtook. CalGEM's September 4, 2025 Notice of Violation directed cleanup but specified no cleanup standard, no verification method, and no analytical criterion by which completion could be judged. Three months later, on December 3, 2025, the State entered the Site, excluded Petitioners from it, and over the following six weeks removed the clarifiers, demolished the containment in which they stood, and graded the ground beneath them.

Petitioners cannot clean soil they were barred from reaching, and the State removed that soil's setting before any sample of it was taken. Whatever the September 2025 notice required, it was overtaken by the State's own control and dominion of the Site.

Findings 3.d and 4.b otherwise rest on CalGEM's August 27, 2025 observations. Each of the conditions described is located within the secondary containment: the clarifiers are placed by CalGEM's own report "within the crude oil tank secondary containment unit"; the "[o]pen buckets of oily fluid" are containers inside the enclosure; the "[s]econdary containment sump open and nearly full" describes containment performing its function; the "wellhead cellar that contained fluids" describes a cellar, which is a sump by design; and the "[h]ole in secondary containment wall" is, by the Regional Board's own caption, a hole "for a pipe", a designed penetration. The reported drip was of fluid, not oil, and was repaired. The only allegation of a release to open

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ground Inspector Davis's report of a possible spill onto the unpaved area, remains unverified by any agency, CalGEM having been unable to confirm it.

G. The Order Requires Petitioners to Mitigate Conditions the State Itself Created

The Order requires sampling "at the locations of the former oil and gas well, tank battery, and oilfield related equipment." Those are precisely the locations where the State and its contractor excavated, demolished, and graded between December 3, 2025 and January 15, 2026, after excluding Temple from the Site. The concrete surfaces that had covered the soil were broken out and staged on bare ground. Fluid was allowed to stand in an unlined excavation at the wellhead. No pre-disturbance samples were taken, although the Regional Board asked for them and CalGEM declined.

The specific ground at issue no longer exists in the condition photographed. The soil CalGEM photographed on August 27, 2025 was the ground around the clarifiers, inside the tank containment. Between December 3, 2025 and January 15, 2026, the State and its contractor removed the clarifiers and their piping, demolished the containment walls, floors, and pads, broke out the concrete and staged it on bare ground, and graded the Site. CalGEM's own photographs from January 6 and 8, 2026 show fluid standing in an unlined excavation at the wellhead, with emulsion, sheen, and an oil-coated sludge mound against broken concrete, and stated that a vacuum truck was used to remove fluid from the well cellar. CalGEM's own photographs record the state in which the Site was left for the year-end holiday.

Photographs taken by CalGEM Engineering Geologist Stephen O'Farrell on December 23, 2025 between 4:15 and 4:17 p.m., with embedded location data on the parcel, show the containment broken open, its concrete slabs demolished and stacked, a large area of bare excavated soil across the former tank area, and loose plastic sheeting weighted with rubble as the only cover, within orange barrier tape. The next photographs in the series are dated January 6, 2026. Operations therefore spanned the winter rainy season and were suspended and resumed across the year-end holiday

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period, with the Site left open in the condition those photographs show. The daily abandonment reports fix the dates. The report for December 23, 2025, Day 17, records: "Demob rig. Set steel plates over well. Berm and set plastic around well. Secure well and clean location. Shut down for Holiday," logged from 10:15 a.m. to 5:00 p.m. The next report in the series is dated January 5, 2026, Day 18, and records: "Remove plates covering well. Utilize gravel to stabilize location for spotting trucks." The Site was therefore left unattended for twelve days, from the evening of December 23, 2025 until the morning of January 5, 2026, with steel plates over the wellhead and plastic bermed around the well as the only protection, and with the demolished containment and the excavated ground left open. (See attached reports marked as Exhibit M).

The result is that the surface the Order directs Petitioners to test is a surface the State created. Whatever its condition on August 27, 2025, it was thereafter stripped of the concrete that covered it, overlain with demolition debris, exposed to standing unlined fluid at the wellhead, left through a rainy season, and regraded. No pre-disturbance sample exists, because the Regional Board asked for six and CalGEM declined to take them.

Petitioners are therefore directed to delineate, at their own expense, conditions that the State altered while Temple was barred from the property, in circumstances where no baseline exists and no sampling protocol can apportion pre-entry conditions from those created during the State's operations. On these facts the burden does not bear a reasonable relationship to any benefit the reports could yield.

H. The Discharger Findings Are Unsupported

Finding 5.a states that Temple Resources, LLC "owns the Site on which the waste is or has discharged" and "also operated the oil and gas well at the Site from the date of ownership on June 1, 2022, to the date of CalGEM's sealing of this well on January 15, 2026." Temple did not operate the well after December 3, 2025. On that date the State entered the Site, excluded Temple, and performed the remaining work itself through its own contractor. The Order's own Finding 3.c says so: it records that the

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work proposed in the Site Stabilization Plan "was completed from December 3, 2025, through January 15, 2026" by CalGEM. The Order thus attributes to Temple a six-week period of operation that, on the Order's own findings, was the State's.

1. Findings 5.b and 5.c rest on past ownership, and ownership is not discharge

Findings 5.b and 5.c are ownership findings. Finding 5.b states that Vida "previously owned the Site from April 4, 2018, to April 28, 2022," and operated the well during that ownership. Finding 5.c states that Mr. C. Nathan "previously owned the Site from February 14, 2011, to April 4, 2018," and that he "owned the Site during a period on which the discharge of waste is or has occurred."

Water Code section 13267, subdivision (b)(1), reaches a person who "has discharged, discharges, or is suspected of having discharged or, discharging, or who proposes to discharge waste." It does not reach a person merely because that person owned land on which someone else discharged. The contrast with section 13304 is instructive: subdivision (a) of that section reaches a person who "has caused or permitted" a discharge, language the Legislature did not carry into section 13267. An order under section 13267 must therefore rest on the named person's own discharge or suspected discharge, not on title.

As to Mr. C. Nathan, the Order identifies no act or omission of his own. It offers three supports, and none supplies a discharge. The first is that he owned the Site between 2011 and 2018, which is title, not conduct.

The second is that he "knew or should have known about the discharge" because he is listed as the "manager or member" and registered agent of Vida Resources, LLC on its Statement of Information. Petitioners do not contest that factual premise. Vida's Statements of Information filed December 13, 2021 and April 30, 2022 do list Chaim Nathan in both capacities, and they are attached as Exhibit O-2 so that the State Water Board has them. The premise is accurate but beside the point. An agent for service of process is a person designated to receive papers; the designation

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fixes an address, not conduct at a well site. A manager or member of a limited liability company occupies the role that Corporations Code section 17703.04, subdivision (a)(2), expressly declines to convert into personal liability for the company's obligations. And knowledge, which is all the Finding actually asserts, is not discharge. Section 13267, subdivision (b)(1), reaches a person who has discharged or is suspected of discharging, not a person who knew that a company discharged.

The third is that he "received NOVs related to suspected discharges associated with Vida Resources LLC's operations." That premise is also accurate, and Petitioners do not contest it. The June 21, 2016 Notice of Violation is addressed to "Mr. Chaim Nathan, Agent, Vida Resources LLC (V1305)," V1305 being Vida's operator number on CalGEM's register, and the notices were sent to Vida's address of record. But the Notice was issued to the company, for the company's lease, and it directed the company to act: "Vida Resources LLC must repair the flow line by July 20, 2016."

Receiving a notice addressed to a company, as the person designated to receive the company's notices, is not the act the notice describes. If it were, every registered agent in California would be a discharger.

What follows from the three supports taken together is that Mr. Nathan owned the Site at a time when Vida operated it, held the roles through which a limited liability company acts, and received the notices a limited liability company receives. That is a description of corporate form, not of conduct or intentional behavior. Section 13267, subdivision (b)(1), does not reach it.

The Regional Board's own operative language confirms the point. The Order's opening paragraph states that the Regional Board "makes the following findings and issues this Order pursuant to Water Code section 13267 requiring Temple Resources, LLC and Vida Resources, LLC to further investigate or assess the site." The cover letter transmitting it states that the enclosed Order "requir[es] Temple Resources, LLC and Vida Resources, LLC to submit a work plan and technical report." Neither sentence names Mr. C. Nathan. He appears only in the caption and in the ordering clause. The

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Regional Board twice described what it was requiring, and twice described it as a requirement of the two companies.

2. The Regional Board identified dischargers from a title report and made no inquiry into the operators its own records disclose

Every discharger finding in the Order derives from a single source. Footnote 6 identifies it: "Ownership information and dates were retrieved from the HomeInfoMax Title History Report." The Regional Board took a commercial title aggregator's ownership chain, selected the three names appearing after February 14, 2011, and designated them “dischargers”. It consulted no recorded instrument, and it made no inquiry into who operated this Site before that date.

The operations at issue span more than a century. CalGEM's WellSTAR record puts a wellbore here in 1903. The City's 1969 determination found the wells "were drilled approximately 70 years ago" and that their nonconforming status was "established in 1934 by Affidavit No. 253." The 1969 applicant and operator was Mary Pietrzyk, who then lived on the site. The 1986 applicant was Balubhai Gopalji Patel, for whom the lease is named. The 1969 determination records that oil production had been "temporarily suspended because of a leak in the storage tank." None of this appears in the Order, and none of these operators was considered.

Petitioners do not ask the State Water Board to name additional dischargers, and nothing in this Petition should be read as an admission that a discharge requiring investigation occurred. The point is evidentiary. Section 13267, subdivision (b)(1), requires the Regional Board to "identify the evidence that supports requiring that person to provide the reports", that person, not some person. Where a site has been in continuous oil production since approximately 1899, where the agency's sole source for attribution is a commercial title report covering the most recent fifteen years, and where the agency has not examined the operators disclosed in the public records of a sister agency and of the City in whose jurisdiction the site sits, the identification the statute requires has not been made. Period.

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3. The discharges on which Findings 5.b and 5.c rest were closed

Both findings rest on the 2016 and 2018 Notices of Violation. CalGEM closed those violations in writing, by the letters attached as Exhibits D and E, and annulled one of them outright. Whatever the Notices of Violation once supported was discharged by the agency that issued them, and the Order does not mention the closure.

I. Petitioners Had No Opportunity to Raise These Issues Before the Regional Board

The substantive issues raised in this Petition were not raised before the Regional Board because Petitioners had no opportunity to raise them. The Order was issued by the Assistant Executive Officer without a hearing, without circulation of a draft for comment, and without prior notice to Petitioners. Petitioners first learned of the Order when it was transmitted by email on September 11, 2026. The Regional Board did not contact any Petitioner at any time during the nine months between CalGEM's referral and issuance, despite having been given Temple's contact information by CalGEM on December 9, 2025.

For the same reason, and to the extent any of the evidence described in this Petition and its exhibits was not before the Regional Board, Petitioners request leave to submit that evidence under 23 Cal. Code Regs. section 2050.6. The evidence consists principally of the Regional Board's and CalGEM's own records, which Petitioners could not have presented in a proceeding that never occurred.

6. <u>THE SPECIFIC ACTION REQUESTED OF THE STATE WATER BOARD</u>

Petitioners request that the State Water Board:

1. Vacate Investigative Order No. R4-2026-0101 in its entirety as to each Petitioner; or, in the alternative

2. Remand the Order to the Regional Board with directions to provide the written explanation of need and identification of supporting evidence that Water Code section 13267(b)(1) requires; and

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3. Direct that any revised order be limited, in the first instance, to a review of existing information — including the Regional Board's own records in Site Cleanup Program Case No. 1359, CalGEM's 2019 compliance closure letters, and available groundwater data — before any subsurface investigation is required; and

4. Direct that the technical scope of any revised order be fitted to the documented features of this Site, and exclude sampling locations that do not exist at the Site; and

5. Direct that any revised order account for the State's own operations at the Site between December 3, 2025 and January 15, 2026, and the absence of any pre-disturbance sampling, in allocating responsibility for characterization; and

6. Direct that any revised order identify, as to each person named, the evidence supporting that person's own discharge, and account for the Site's operational history prior to 2011 as disclosed in the records of CalGEM and of the City of Los Angeles; and

7. Direct that any further or revised order requiring investigation of the discharges depicted in CalGEM's own photographs of the Site taken between December 3, 2025 and January 14, 2026, including the unlined pooled fluid at the wellhead, the oil-coated sludge staged against broken concrete, and the demolition debris placed directly on exposed soil, shown in the photographs attached as Exhibits L-1 through L-3, be directed to the persons who created those conditions, namely the California Geologic Energy Management Division and its contractor Driltek, Inc., each of which is a "person" within the meaning of Water Code section 13050, subdivision (c), and each of which had exclusive possession and control of the Site throughout that period.

8. Strike Findings 5.b and 5.c, or remand them for reconsideration in light of CalGEM's 2019 closure of the 2016–2018 violations; and

9. Grant such other relief as is appropriate.

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REQUEST FOR STAY

Petitioners request a stay of the Order pending the State Water Board's review. A stay requires a showing of (1) substantial harm to petitioners or to the public interest if a stay is not granted, (2) a lack of substantial harm to other interested persons and to the public interest if a stay is granted, and (3) substantial questions of fact or law regarding the disputed action. Each is satisfied in this petition.

1. Substantial harm absent a stay

The Order requires a Site Assessment Work Plan by December 10, 2026, before the State Water Board can complete its review, at a stated cost of $50,000 to $150,000. Those are costs that will be incurred during the period this Petition is under review, and they are not recoverable if the Order is vacated.

2. No substantial harm to others or to the public interest from a stay

The well has been wrongfully plugged and abandoned and the production facility removed bhy the State. No operations continue at the Site. The Regional Board itself waited nine months after CalGEM's referral before acting, and declined to sample when the Site was open and the opportunity was available to it at no cost to itself. A stay preserves the status quo during review and delays only the preparation of a work plan.

3. Substantial questions of fact and law

The questions presented include whether this Order satisfies the written-explanation and evidence-identification requirements of Water Code section 13267(b)(1); whether reports limited to soil and soil vapor bear a reasonable relationship to a stated benefit of protecting groundwater quality; and whether Petitioners may be required to characterize conditions created by the State during a period when Temple was excluded from the Site.

This request is supported by the Declaration of David Nathan, executed under penalty of perjury and submitted herewith as required by 23 Cal. Code Regs. section 2053, subdivision (a).

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STATEMENT OF SERVICE

On October 10, 2026, a true and correct copy of this Petition, with all exhibits and the supporting declaration, was sent by electronic mail to the California Regional Water Quality Control Board, Los Angeles Region, to the attention of its Executive Officer and of Ryan Vitug, Engineering Geologist, and to each person named as a discharger in the Order. Each person named as a discharger in the Order is a Petitioner herein. A proof of service is attached.

This Petition is filed with the State Water Resources Control Board, Office of Chief Counsel, by electronic mail to waterqualitypetitions@waterboards.ca.gov, with a paper copy to Office of Chief Counsel, State Water Resources Control Board, P.O. Box 100, Sacramento, California 95812-0100.

EXHIBIT LIST

A — Investigative Order No. R4-2026-0101, September 11, 2026 (signed Russ Colby, Assistant Executive Officer), with Attachments 1-5, and transmittal cover letter of the same date (certified mail, return receipt requested)

B — CalGEM referral letter to the Regional Board, November 3, 2025

C — CalGEM Phase 2 Findings Report, October 2, 2025 (with Attachments 1–3)

D — CalGEM (DOGGR) letter, April 15, 2019: "Violation Compliance, Violation Numbers V116-00207 through V116-00214, and V118-00036 through V118-00037, Environmental Lease Inspection, Patel Lease, Los Angeles City Field"

E — CalGEM (DOGGR) letter, June 7, 2019: "Violation Compliance, Environmental Lease Inspection, Patel Lease, Los Angeles City Field"

F — CalGEM field memorandum, May 10, 2019

G — CalGEM memorandum documenting rebuilt containment, December 18, 2019

H — Uniform Hazardous Waste Manifest No. 004810898 SKS (generator signed December 28, 2017) and generator waste report, 2017-2020

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I — DOGGR photographs of the rebuilt containment, December 18, 2019, 10:41 a.m.

J — Regional Board letter to Neda Tafi, CalGEM, December 8, 2025: "Review of the Site Stabilization Plan Patel Lease and Los Angeles City Field, Los Angeles Co., Temple Resources, LLC Phase 2 Findings Report" (signed Kevin Tomita, P.G.; cc Pete Beskas, CalGEM Southern District, and Ching-Yin To, Los Angeles Water Board)

K — Email thread, Tomita-Tafi, December 8-9, 2025, as forwarded by Neda Tafi to Renee Weigand on January 12, 2026

L-1 — CalGEM photographs TC_00020, TC_00022-TC_00025, TC_00028 (December 23, 2025, 4:15-4:17 p.m., S. O'Farrell)

L-2 — CalGEM photographs TC_00042-TC_00044 (January 6, 2026, 8:09-8:10 a.m.)

L-3 — CalGEM photographs TC_00048, TC_00053 (January 8, 2026, 9:05 and 9:51 a.m.)

M — Daily Abandonment Reports, Patel 2, December 3, 2025 and January 5, 2026

N — Los Angeles Fire Department CUPA correspondences: Oldaker to Belknap (December 2, 2025) and Flynn reply confirming dismissal in CERS (December 3, 2025) and October 22 and 24, November 18.

N-2 — Kevin Tomita trip plan for the December 8, 2025 site visit, signed December 8, 2025

N-3 — Regional Board site photographs, November 24, 2025 (IMG_1485–1487)

N-4 — Regional Board site photographs, December 8, 2025 (IMG_1520–1527)

O-1 — HomeInfoMax Title History Report for AIN 5160-022-021, cited at footnote 6 of the Order

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O-2 — Vida Resources, LLC Secretary of State filings: Articles of Organization (filed April 10, 2012) and Statements of Information (filed December 13, 2021 and April 30, 2022)

R — City of Los Angeles ZIMAS report for AIN 5160-022-021

T — CalGEM WellSTAR well detail record, Patel 2 (API 0403718961)

U — City of Los Angeles Office of Zoning Administration determination, Z.A.I. Case No. 2729-O, November 21, 1969

V — City of Los Angeles Office of Zoning Administration staff report, Case No. ZA 85-1343(NC), January 30, 1986

Y — Pacific Coast Area Laboratory, Complete Water Analysis Report, Patel 2, sample dated October 12, 2023, reported November 15, 2023

T — CalGEM WellSTAR well detail, Patel 2, API No. 0403718961

Dated: October 10, 2026

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Attorneys at Law

By: _____
Mike Montes, Jr.
Attorneys for Defendant,
Temple Resources, LLC

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EX A — Investigative Order No. R4-2026-0101, September 11, 2026 (signed Russ Colby

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INVESTIGATIVE ORDER NO. R4-2026-0101

CALIFORNIA WATER CODE SECTION 13267 ORDER
ORDER TO PROVIDE TECHNICAL REPORTS FOR SUBSURFACE INVESTIGATION

DIRECTED TO
TEMPLE RESOURCES, LLC AND VIDA RESOURCES, LLC, AND
MR. CHAIM NATHAN

TEMPLE RESOURCES
314 FIRMIN STREET, LOS ANGELES, CALIFORNIA 90026
(SITE CLEANUP PROGRAM NO. 1678)

ON
SEPTEMBER 11, 2026

The California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board) makes the following findings and issues this Order pursuant to Water Code section 13267 requiring Temple Resources, LLC and Vida Resources, LLC to further investigate or assess the site located at 314 Firmin Street, Los Angeles, California 90026 (the Site).

1. The Site is located in a residential area. The Los Angeles County Assessor's Identification Number (AIN) is 5160-022-021 (see Attachment 1: Site Location Map). The land use type is multi-family residence. The Site is located in the backyard of two single-family residences and is surrounded by Firmin street to the west, a single vacant lot to the immediate north, a double vacant lot to the immediate east, and a multi-family residential apartment to the south.

2. Activities at the Site included prior operations of a former single oil and gas well and associated tank facility from January 1977 through December 2025. The American Petroleum Institute (API) Number for the oil and gas well is 0403718961. The Site consisted of an oil and gas well and a two-tank processing battery (see Attachment 2: General Site Photo). The tank battery was surrounded by secondary containment and concrete foundations and flooring. The former oil and gas well, tank battery and associated operations have been under the oversight of the California Department of Conservation, Geologic Energy Management Division (CalGEM).

3. Based on environmental conditions documented by CalGEM and summarized below, the Los Angeles Water Board has determined that there is or has been a discharge of waste at or from the Site that has or could affect the quality of waters of the State.

    a. During a June 13, 2016 site inspection, CalGEM staff observed oil-impacted soil within the tank containment area around both the wash and crude tanks, and

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around drums stored to the south of the crude tank. A CalGEM Notice of Violation (NOV[1]) dated June 21, 2016 indicated that the crude oil tank spill likely occurred after August 2015 based on prior inspections and directed Vida Resources, LLC to clean up the impacted soil by July 20, 2016.

b. On November 4, 2017, CalGEM responded to a spill of approximately 30 barrels of oil and water at the tank facility. A CalGEM NOV[1] issued to Vida Resources, LLC on February 16, 2018, directed Vida Resources, LLC to clean up the Site. Subsequent inspections by CalGEM on November 20, 2017, and February 14, 2018, indicated there had been minimal activity at the Site since the initial inspection and noted that remediation of the spill had not been fully completed.

c. The *Site Stabilization Plan*[2] (SSP) dated October 22, 2025, prepared by Driltek, Inc. for CalGEM, presented the planned activities to stabilize the Site, which consisted of the following: abandonment of the oil well, demolition and removal of the tank battery, removal of all oilfield related equipment and materials, and isolation and removal of utility services. According to CalGEM's *Community Notice - Oil and Gas Enforcement Action Update*[3] dated February 2, 2026, the work proposed in the SSP was completed from December 3, 2025, through January 15, 2026. As of January 15, 2026, the oil and gas well has been permanently sealed, and all associated facilities have been removed according to applicable CalGEM regulations (see Attachment 2: General Site Photo).

d. The Los Angeles Water Board received a letter[4] dated November 3, 2025, from CalGEM, requesting that the Los Angeles Water Board investigate the soil at the Site. The letter notified the Los Angeles Water Board of an inspection by the Los Angeles Fire Department (LAFD) on August 26, 2025, and a follow-up inspection by CalGEM on August 27, 2025. The LAFD inspector noted several environmental concerns, including: i) a possible unreported spill of oil onto an unpaved area surrounding the tank farm; ii) saturated oil-stained soil on the unpaved ground surface surrounding four plastic clarifiers; and iii) an active fluid drip from the piping connected to the clarifiers. The LAFD inspector also provided CalGEM a video

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[1] Notices of Violation dated June 21, 2016, and February 16, 2018, are Attachments 1 and 2, respectively, in the *Phase 2 Findings Report* (Report) dated October 2, 2025. Link to Report.

[2] Link to *Site Stabilization Plan* (SSP) dated October 22, 2025: SSP.

[3] Link to CalGEM's Community Notice - Oil and Gas Enforcement Action Update dated February 2, 2026: Notice.

[4] Link to CalGEM letter dated November 3, 2025, to the Los Angeles Water Board: Letter.

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from an anonymous source showing an onsite tank overflowing with fluids and spilling out the top and running down the side of the tank. CalGEM was unable to verify some of LAFD's observations during its inspection due to "a healthy growth of vegetation in the area." However, CalGEM personnel observed older and saturated oil-stained soil on the unpaved ground surface surrounding four plastic clarifiers at the Site as well an active fluid drip from the piping for these containers. While the operator fixed the drip, CalGEM's November 3rd, 2025 letter indicated that the oil-stained soil still had not been cleaned up.

4. The Los Angeles Water Board has reviewed the photographic evidence from CalGEM site inspections documented in their Phase 2 Findings Report and concluded that the following photos are indicative of a discharge of oil at or from the Site that has or could affect the quality of waters of the State:

   a. Photos from the November 4, 2017, CalGEM site inspection documenting crude oil in soil as well as staining and accumulation of oil on a cinderblock wall at the Site (see Attachment 3).

   b. Photos from the August 27, 2025 CalGEM site inspection documenting saturated oil-stained soil on unpaved ground surfaces and an active fluid drip from piping (see Attachment 4) as well as evidence of poor housekeeping practices that may be indicative of past discharge, current discharge, or threat of a discharge such as: i) open buckets of oily fluid on the floor; ii) a secondary containment sump that was open and nearly full; iii) a wellhead cellar that contained fluids; and iv) a hole in the secondary containment wall for a pipe (see Attachment 5).

5. This Order identifies Temple Resources, LLC, Vida Resources, LLC, and Nathan Chaim as dischargers because:

   a. Temple Resources, LLC[5] owns the Site on which the waste is or has discharged that could affect the quality of waters of the State. Temple Resources, LLC became owner of the Site in June 2022, and currently owns the Site. Temple Resources, LLC also operated the oil and gas well at the Site from the date of ownership on June 1, 2022[6], to the date of CalGEM's sealing of this well on January 15, 2026.

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[5] CalGEM's oil and gas well online database, WellSTAR, identifies Temple Resources, LLC as operator of the oil and gas well. Link to CalGem's WellSTAR database: WellSTAR

[6] Ownership information and dates were retrieved from the HomeInfoMax Title History Report. Link to Report

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b. Vida Resources, LLC[6] previously owned the Site from April 4, 2018, to April 28, 2022, on which the discharge of waste is or has occurred that could affect the quality of waters of the State. Vida Resources, LLC also operated the oil and gas well during its ownership as documented by CalGEM.

c. Mr. Chaim Nathan[6] previously owned the Site from February 14, 2011, to April 4, 2018. Mr. Nathan owned the Site during a period on which the discharge of waste is or has occurred that could affect the quality of waters of the State. Mr. Nathan knew or should have known about the discharge at the Site because he is listed as the "manager or member" and registered agent for Vida Resources, LLC on the Statement of Information for Vida Resources, LLC that was filed with State of California, Office of the Secretary of State. He also received NOVs related to suspected discharges associated with Vida Resources LLC's operations (e.g., the CalGem NOVs dated June 21, 2016 and February 16, 2018.[7])

6. Water Code Section 13267, subdivision (b)(1) states, in part:

"In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or, discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports."

7. This Order requires the persons named herein to prepare and submit a work plan and technical report to investigate and fully delineate the discharge of oil onto soil at the Site. You are expected to submit a complete work plan and technical report as required by this Order. The Los Angeles Water Board may reject the work plan and

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[7] Notices of Violation dated June 21, 2016, and February 16, 2018, are Attachments 1 and 2, respectively, in the *Phase 2 Findings Report* (Report) dated October 2, 2025. Link to Report.

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technical report if they are deemed incomplete and/or require revisions under this Order.

8. The burdens, including costs, of these reports bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. The information is necessary to protect groundwater quality, which may be impacted from wastes discharged to soil as a result of the activities performed at the Site, to adequately determine the extent of discharges of waste at and from the Site, to assure adequate cleanup of the Site, if necessary, and to assure that discharges of waste that could impact water quality will be addressed. These activities all protect human health and the environment. The technical report required by this Order may cost in the range of $50,000 to $150,000, depending upon the number and depths of sampling locations.

9. The issuance of this Order is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to California Code of Regulations, title 14, section 15308 because it is an action to assure the maintenance, restoration, enhancement, or protection of the environment. This Order is also exempt from CEQA pursuant to California Code of Regulations, title 14, section 15306 because it is for the purposes of information collection. It is unlikely that compliance with this Order, including implementation of the work plans, could result in anything more than minor physical changes to the environment. (Pub. Res. Code § 15061, subd. (b)(3) [common sense exemption].) If the implementation of this Order may result in significant impacts on the environment, the appropriate lead agency will address the CEQA requirements prior to approval of any work plan.

10. Any person aggrieved by this action of the Los Angeles Water Board may petition the State Water Resources Control Board (State Water Board) to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Note that filing a petition does not stay the requirements of this Order. Copies of the law and regulations applicable to filing petitions may be found on the Internet at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

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THEREFORE, IT IS HEREBY ORDERED that Temple Resources, LLC, and Vida Resources, LLC, and Mr. Chaim Nathan, pursuant to Water Code section 13267, subdivision (b), are required to submit the following:

1. By **December 10, 2026**, a Site Assessment Work Plan (Work Plan) for a subsurface investigation that shall vertically and horizontally delineate the extent of the discharges of oil in soil and soil vapor. The Work Plan shall include, but not be limited to, soil matrix analysis for the following chemicals of potential concern (COPCs): total petroleum hydrocarbons (TPH[8]), volatile organic compounds (VOCs), and heavy metals[9]. The Work Plan shall also include soil vapor analysis for VOCs and TPH because these COPCs can volatilize into soil vapor. At a minimum, samples shall be collected at the locations of the former oil and gas well, tank battery, and oilfield related equipment, including but not limited to any former oil derrick, clarifiers, chemical storage areas, degreasers, plating lines, and sumps. The locations of soil borings, soil vapor probes, and soil and soil vapor sample locations must be presented on a scaled site map. The Work Plan should be prepared in accordance with the guidance documents that can be found at the following links:

   General Work Plan Requirements for a Heavy Metal Soil Investigation
   http://waterboards.ca.gov/losangeles/water_issues/programs/remediation/General%20Workplan%20Requirements%20for%20a%20Heavy%20Metals%20Soil%20Investigation.pdf

   Advisory – Active Soil Gas Investigations (July 2015)
   https://dtsc.ca.gov/wp-content/uploads/sites/31/2021/11/VI_ActiveSoilGasAdvisory_FINAL_a.pdf

2. The above item shall be submitted to:

   Mr. Ryan Vitug
   Los Angeles Regional Water Quality Control Board
   320 West 4th Street, Suite 200
   Los Angeles, CA 90013
   Phone: (213) 576-6663
   Email: Ryan.Vitug@waterboards.ca.gov

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[8] Total petroleum hydrocarbons (TPH) are a broad family of several hundred chemical compounds that originally come from crude oil. References: Agency for Toxic Substances and Disease Registry and Department of Toxic Substances Control.

[9] Crude oil naturally contains heavy metals, including nickel, iron, cadmium, and lead. Reference: Department of Toxic Substances Control.

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3. Pursuant to Water Code section 13268, subdivision (a), any person who fails to submit reports in accordance with the Order is guilty of a misdemeanor. Pursuant to Water Code section 13268, subdivision (b)(1), failure to submit the required technical report described above by the specified due date(s) may result in the imposition of administrative civil liability by the Los Angeles Water Board in an amount up to one thousand dollars ($1,000) per day for each day the technical report is not received after the above due date. These civil liabilities may be assessed by the Los Angeles Water Board for failure to comply, beginning with the date that the violations first occurred, and without further warning.

4. Chapter 30, Division 3 of Title 23 of California Code of Regulations (CCR) requires persons responsible for submitting reports to ensure the electronic submission of laboratory analytical data (i.e., soil or water chemical analysis) and locational data (i.e., location and elevation of groundwater monitoring wells) via the Internet to the State Water Resources Control Board's GeoTracker database. The regulations and other background information regarding GeoTracker, and electronic submission of data are available at https://www.waterboards.ca.gov/ust/electronic_submittal/.

   In accordance with the regulations, you must upload the following information to the State Water Resources Control Board's GeoTracker database: reports and work plans (in PDF format), laboratory analytical data (in electronic data format [EDF]), monitoring event information in GEO_WELL format, an updated site map (GEO_MAP) showing any monitoring well locations, boring logs in PDF (GEO_BORE) to be used to link to well locations, monitoring well latitude and longitude (GEO_XY) survey data, and well elevation data (GEO_Z). EDF files shall be formatted in accordance with current EDF guidance letters available at https://geotracker.waterboards.ca.gov/edfletters/.

   Vapor and air analytical data collected for vapor intrusion investigations related to the Site should also be uploaded to GeoTracker. Vapor probe and sampling locations not surveyed should be manually entered into GeoTracker. Additionally, vapor intrusion building profile(s) should be created in GeoTracker with the data. Please see the State Water Resources Control Board's August 2019 Guidance on Uploading Vapor Intrusion Information into GeoTracker, available at https://www.waterboards.ca.gov/water_issues/programs/site_cleanup_program/vapor_intrusion/docs/2020/viesi_guide_v1.pdf, for information on uploading vapor data, manually entering in field points and how to create a vapor intrusion building profile.

   To comply with the above referenced regulation, you are required to upload all technical reports, documents, and well data to GeoTracker by the due dates specified in the Los Angeles Water Board letters and orders issued to you or for the Site. However, the Los Angeles Water Board may request that you submit hard copies of

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selected documents and data in addition to electronic submittal of information to GeoTracker. For your convenience, the GeoTracker Global ID for this site is T10000024570.

5. The Los Angeles Water Board, under the authority given by Water Code section 13267, subdivision (b)(1), requires you to include a perjury statement in all reports as required by this Order. The perjury statement shall be signed by a senior authorized company representative (not by a consultant). The perjury statement shall be in the following format:

> "I, [NAME], certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

SO ORDERED.

Russ Colby Digitally signed by Russ Colby Date: 2026.09.11 11:17:01 -07'00'

Russ Colby
Assistant Executive Officer

September 11, 2026
Date

Attachments:

Attachment 1: Site Location Map
Attachment 2: General Site Photo
Attachment 3: Site Inspection Photos from CalGEM dated November 4, 2017
Attachment 4: Site Inspection Photos from CalGEM dated August 27, 2025
Attachment 5: Site Inspection Photos from CalGEM dated August 27, 2025

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Attachment 1: Site Location Map





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Attachment 2: General Site Photo



General site photo (prior to well sealing and facilities removal) showing the area with the tank farm enclosed within a wire mesh storm fence.



General site photo following well sealing and facilities removal as of January 15, 2026.

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Attachment 3: Site Inspection Photos from the California Department of Conservation, Geologic Energy Management Division (CalGEM) dated November 4, 2017



Green arrows highlight crude oil in soil.



Hand excavation inside southwest corner of Tank No. 1 secondary containment area. Green arrows highlight crude oil staining and accumulation on cinderblock wall.

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Attachment 4: Site Inspection Photos from CalGEM dated August 27, 2025



Pipe extending from clarifier. Active leak was observed from the pipe joint shown in the red box.



Oil stained soil below piping.

Attachment 5: Site Inspection Photos from CalGEM dated August 27, 2025 (Continued)

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Open buckets of oily fluid.



Secondary containment sump open and nearly full.



Wellhead cellar contains fluids.



Hole in secondary containment wall for a pipe.

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Water Boards

Gavin Newsom
Governor

Yana Garcia
Secretary for Environmental Protection

Los Angeles Regional Water Quality Control Board

September 11, 2026

Mr. David Nathan
Temple Resources, LLC
859 N. Virgil Avenue
Los Angeles, CA 90029

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO.: 9589 0710 5270 1153 2501 10

Mr. Chaim Nathan
Vida Resources, LLC
859 N. Virgil Avenue
Los Angeles, CA 90029

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO.: 9589 0710 5270 1153 2501 27

SUBJECT: REQUIREMENT FOR TECHNICAL REPORTS PURSUANT TO CALIFORNIA WATER CODE SECTION 13267 ORDER NO. R4-2026-0101

SITE: TEMPLE RESOURCES, 314 FIRMIN STREET, LOS ANGELES, CALIFORNIA (SCP NO. 1678, GLOBAL ID NO. T10000024570)

Dear Messrs. David Nathan and Chaim Nathan:

The California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board) is the public agency with the primary responsibility for the protection of ground and surface water for all beneficial uses within major portions of Los Angeles and Ventura counties, including the above-referenced site (Site). To accomplish this, the Los Angeles Water Board issues investigative orders authorized by the Porter-Cologne Water Quality Control Act (California Water Code [CWC], Division 7).

Enclosed is a California Water Code section 13267 Order No. R4-2026-0101 (Order) requiring Temple Resources, LLC and Vida Resources, LLC to submit a work plan and technical report to investigate the discharge of oil to unpaved soil from a former oil and gas well at the Site. This Order is issued to you due to discharges at the Site, as explained in more detail in the attached Order. You have been identified as a discharger, which is also explained in more detail in the attached Order.

MONTES & ASSOCIATES
Attorneys at Law
12520 Magnolia Blvd.,
Valley Village, CA 91607
(213) 353-9416

If you have any questions regarding this letter or the enclosed Order, please contact Mr. Ryan Vitug, Engineering Geologist at (213) 576-6663 or via email at Ryan.Vitug@waterboards.ca.gov or contact Ms. Jillian Ly, Remediation Section II Manager at (213) 576-6664 or via email at Jillian.Ly@waterboards.ca.gov.

Sincerely,

Russ Colby Digitally signed by Russ Colby Date: 2026.09.11 11:16:43 -07'00'

Russ Colby
Assistant Executive Officer

Enclosure: Investigative Order No. R4-2026-0101

cc: Ms. Adriana Nuñez, Office of Chief Counsel, State Water Resources Control Board
Ms. Neda Tafi, California Geologic Energy Management Division, Department of Conservation
Mr. Pete Beskas, California Geologic Energy Management Division, Department of Conservation

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B — CalGEM referral letter to the Regional Board, November 3, 2025

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Docusign Envelope ID: BF53BCE4-1128-4D13-A98E-5BC6BF0FC910

California
Department of Conservation
Geologic Energy Management Division

Gavin Newsom, Governor
Jennifer Lucchesi, Director

November 3, 2025

VIA EMAIL ONLY

Ms. Ching-Yin To, Enforcement I Manager
Los Angeles Regional Water Quality Control Board
320 4th Street, Suite 200
Los Angeles, CA 90013
Ching-Yin.To@waterboards.ca.gov

Dear Ms. To:

POTENTIAL SOIL CONTAMINATION AT TEMPLE RESOURCES, LLC, PATEL TANK FARM, LOS ANGELES CITY FIELD

On August 26, 2025, California Geologic Energy Management Division (CalGEM) received a notification from Inspector John Davis of the Los Angeles Fire Department (LAFD) regarding subsurface contaminations resulting from oil and gas operations by Temple Resources, LLC. The facility of concern is the Patel Tank Farm located behind a residence at the address of 314 Firmin Street, Los Angeles, CA 90026.

Inspector Davis reported that he visited the Patel Lease several times and noted several environmental concerns and a possible unreported spill of oil onto unpaved area surrounding the tank farm. He also informed us of a video he received from an anonymous source showing an on-site tank overflowing with fluids, spilling out the top and running down the side of the tank. Inspector Davis provided photographs and the video to CalGEM.

On August 27, 2025, CalGEM personnel conducted an inspection of the site to follow up on the information provided by Inspector Davis. We did not observe evidence of the oil in the area as Inspector Davis described due to a healthy growth of vegetation in the area. However, we observed older and saturated oil-stained soil on the unpaved ground surface surrounding four plastic clarifiers. We observed an active fluid drip from the piping connected to these containers. The drip was later fixed after we issued a violation, but the oil-stained soil has not been cleaned up.

CalGEM does not have the expertise or practice of soil and/or groundwater contamination investigation and/or remediation, and we would generally defer to the Water Boards' authority and expertise on these issues.

We are writing to request the Los Angelese Regional Water Quality Control Board investigate the site and instruct the operator on necessary steps to ensure the site soil does not pose a risk or hazard to the human health and/or environment.

State of California Natural Resources Agency | Department of Conservation
Southern District, 3780 Kilroy Airport Way, Suite 400, Long Beach, CA 90806
conservation.ca.gov | T: (562) 637-4400 | F: (562) 424-0166

Docusign Envelope ID: BF53BCE4-1128-4D13-A96E-5BC6BF0FC910

Ms. Ching-Yin To, Enforcement I Manager
Los Angeles Regional Water Quality Control Board
Referral for potential soil contamination evaluation
November 3, 2025

If there is anything that CalGEM can do to support your efforts in assessing the soil at the site or if you have any questions, please contact Renee Weigand at Renee.Weigand@conservation.ca.gov.

Sincerely,

Pete Beskas

Pete Beskas
CalGEM Southern District Deputy

Enclosure: Selected Undated Photographs provided by Inspector John Davis (LAFD)
CalGEM Photographs of Oil-Stained Soil – August 27, 2025

cc: Suman Ghosh, Supervising Oil and Gas Engineer, CalGEM Southern District
Lindsey Miller, Enforcement Chief, CalGEM
Justin Turner, Chief Counsel, Department of Conservation

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Docusign Envelope ID: BF53BCE4-1128-4D13-A98E-5BC6BF0FC910



Selected Undated Photographs
provided by Inspector Davis (LAFD)



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Docusign Envelope ID: BF53BCE4-1128-4D13-A98E-5BC6BF0FC910

CalGEM Photographs of Oil-Stained Soil – August 27, 2025







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C — CalGEM Phase 2 Findings Report, October 2, 2025 (with Attachments 1–3)

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Los Angeles City Field

Los Angeles Co.

Temple Resources, LLC

Phase 2 Findings Report

This report presents investigation findings, including identified locations of wellheads, tank settings, sumps, and other oil- and gas-related features and components of orphan wells and facilities proposed for removal and abandonment. These findings are summarized in the following annotated maps, tables, and photographs. Observations of outstanding issues or areas of concern (e.g., significant environmental media impacts or identified site access issues) and other notes are included as text below, or as annotations within the maps, tables, and photos.

The Patel 2 well and associated tank facility is located behind a single-family residence at 314 Firmin Street in an urban residential area of Los Angeles. The site is accessed via a driveway between 314 and 316 Firmin Street. This site has for years been the focus of numerous incidents and complaints pertaining to operational practices and leading to several notices of violations (NOVs) issued by CalGEM.

CalGEM records dating from 2015 to the present were reviewed during this desk study. The following is a brief synopsis of the more significant events and violations noted in file documents provided by the CalGEM Southern District.

June 21, 2016- Notice of Violation and site inspection notes: This NOV, dated June 21, 2016, was based on a site inspection conducted by CalGEM on June 13, 2016. Among other regulatory violations, site inspection notes include observation of oil-impacted soil within the tank containment area around both the wash and crude oil tanks, and around drums stored to the south of the crude oil tank. The NOV, sent to Vida Resources, LLC, directed them to clean up the impacted soil by July 20, 2016, and to notify CalGEM so that CalGEM personnel could confirm that this, and other violations, had been corrected.

Notes within the 2016 NOV referenced earlier lease inspections and deduced that a spill related to the crude oil tank likely occurred after August 2015. Vida Resources was additionally cited for negligence in failing to report the spill(s) within 48 hours. This June 2016 NOV is included as **Attachment 1**.

February 16, 2018- Notice of Violation and site inspection notes: On November 4, 2017, CalGEM responded to a spill of approximately 30 barrels of oil and water at the Patel tank facility. The spill had occurred on or about September 26, 2017. The operator was directed to clean up the site.

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CalGEM conducted subsequent site inspections on November 20, 2017, and February 14, 2018, to check on the site cleanup status following the reported spill. The inspections revealed that little activity had occurred since the initial inspection, and remediation of the spill had not been fully completed. An NOV, dated February 16, 2018, was consequently issued to Vida Resources, LLC.

The February 2017 NOV, along with annotated maps and photographs from the original November 4, 2017, CalGEM site inspection, are included as **Attachment 2**.

Other site visits and inspections in the intervening years yielded no evidence of significant cleanup action. Continuing poor site and equipment control, and potential safety issues were noted.

A summary letter of inspections and compliance notices was sent to the operator on April 15, 2019, acknowledging the operator's compliance efforts as well as reiterating several outstanding compliance issues. This letter is included as **Attachment 3**.

August 27, 2025- Inspection and Notice of Violation- The most recent lease inspection was conducted on August 27, 2025, in response to a complaint. This inspection resulted in an NOV dated September 4, 2025. The site inspection yielded, among other observed violations, a detection of fugitive gas emissions from the wash tank.

Most of the photos presented in this LESA were obtained from this recent site inspection. The annotated images show outstanding compliance issues, including evidence of oil-impacted soils on the site.

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Los Angeles City Field
Temple Resources, LLC

Area Vicinity Map



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Los Angeles City Field
Temple Resources, LLC

Site Vicinity Map



Los Angeles City Field
Temple Resources, LLC

Site Map



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Site Photos
Los Angeles City Field
Temple Resources, LLC



General site photo showing the area with the tank farm enclosed within a wire mesh storm fence

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Site Photos
Los Angeles City Field
Temple Resources, LLC





Evidence of poor housekeeping practices: exterior (left image) and portions of the interior (right image) of the storm fence containing pumping rods, a vessel, various containers, miscellaneous items, and debris. (1 of 2)

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Site Photos
Los Angeles City Field
Temple Resources, LLC





Evidence of poor housekeeping practices: exterior (left image) and portions of the interior (right image) of the storm fence containing pumping rods, a vessel, various containers, miscellaneous items, and other debris. (2 of 2)

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Site Photos
Los Angeles City Field
Temple Resources, LLC

Patel 2 Well



Patel 2 API# 0403718961: Site inspection 3/23/2022; cellar contains fluids

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Site Photos
Los Angeles City Field
Temple Resources, LLC

Patel 2 Well

	
Scheduled Lease Inspection 9/29/2023; cellar is clean	Scheduled Lease Inspection 10/30/2023; cellar is clean
	Blank
Following complaint 8/27/2025: Note, the cellar contains fluids	

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Site Photos
Los Angeles City Field
Temple Resources, LLC

Tanks and Secondary Containment Area



Open buckets of oily fluid



Hole in secondary containment wall for pipe



Secondary containment sump open and nearly full



Poor housekeeping/slip, trip, fall hazards

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Site Photos
Los Angeles City Field
Temple Resources, LLC

Tanks and Secondary Containment Area

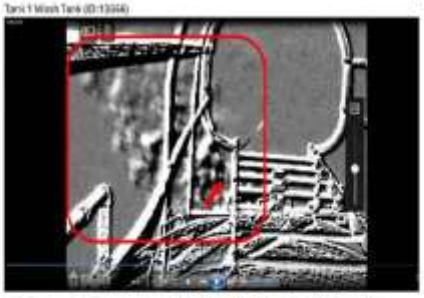




Weeds within the containment unit and unlined trench



Abundant oily soil staining is evidence of leaks/spills (2025 photo)



FLIR Video screenshot indicating a gas leak above Tank 1 Wash Tank

Site Photos
Los Angeles City Field
Temple Resources, LLC



Four clarifiers are located within the crude oil tank secondary containment unit.



Component	ID #	Name
Tank	28070	Clarifier 1
Tank	28071	Clarifier 2
Tank	28072	Clarifier 3
Tank	28073	Clarifier 4

Clarifiers observed unlabeled

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Site Photos
Los Angeles City Field
Temple Resources, LLC

	View of clarifiers adjacent to crude oil tank 2
	Pipe extending from clarifier 4. Active leak observed from the pipe joint shown in the red box

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Los Angeles City Field
Temple Resources, LLC

Attachment 1

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State of California • Natural Resources Agency
Edmund G. Brown Jr., Governor
Department of Conservation
Division of Oil, Gas, and Geothermal Resources – District 1
5816 Corporate Avenue • Suite 100
Cypress, CA 90630
(714) 816-6847 • FAX (714) 816-6853

NOTICE OF VIOLATION

June 21, 2016

Reports #V116-00207 to #V116-00213

Mr. Chaim Nathan, Agent
Vida Resources LLC (V1305)
859 North Virgil Ave. #B
Los Angeles, CA 90029

Dear Mr. Nathan:

LEASE INSPECTION AT VIDA RESOURCES LLC'S "PATEL" LEASE IN THE LOS ANGELES CITY FIELD

On June 13, 2016, Division of Oil, Gas, and Geothermal Resources (Division) Associate Oil and Gas Engineer Kathleen Andrews and Engineering Geologist Raul Lima conducted a lease inspection at Vida Resource's "Patel" lease in the Los Angeles City field. This letter itemizes violations to California Code of Regulations (CCR) based upon observations made during the lease inspection.

Violation No. V116-00207

CCR section 1773.3(a) states that "All tanks shall be properly identified with the operator's tank identification number, tank type (production, stock, water, etc.), and with appropriate materials hazard placards or labels."

The wash tank at Vida Resources LLC "Patel" lease is not identified with the operator's tank identification number. Vida Resources LLC must identify the wash tank with the operator's tank identification number by July 20, 2016, and notify the Division so that Division personnel can confirm that the violation has been corrected.

Violation No. V116-00208

CCR section 1773.3(a) states that "All tanks shall be properly identified with the operator's tank identification number, tank type (production, stock, water, etc.), and with appropriate materials hazard placards or labels."

The crude oil tank at Vida Resources LLC "Patel" lease is not identified with the operator's tank identification number. Vida Resources LLC must identify the crude oil tank with the operator's tank identification number by July 20, 2016, and notify the Division so that Division personnel can confirm that the violation has been corrected.

Violation No. V116-00209

CCR section 1777(a) states that "Operators shall maintain production facilities in good condition and in a manner to prevent leakage or corrosion and to safeguard life, health, property, and natural resources."

June 21, 2016

Reports #V116-00207 to #V116-00213

Mr. Chaim Nathan, Agent
Vida Resources LLC (V1305)
Page 2

The flow line between Vida Resources LLC well "Patel" 2 (037-18961) and the wash tank is leaking and filling the well cellar. Vida Resources LLC must repair the flow line by July 20, 2016, and notify the Division so that Division personnel can confirm that the violation has been corrected.

Violation No. V116-00210

CCR section 1778 states that "Fences shall be not less than 5 feet high and mounted on 1 1/4" diameter steel posts with at least three strands of barbed wire mounted at a 45-degree angle from the top of the fence."

The perimeter fence around Vida Resources LLC "Patel" lease does not have three strands of barbed wire mounted at a 45-degree angle from the top of the fence. Vida Resources LLC must add the barbed wire mounted at a 45-degree angle to the top of the fence by July 20, 2016, and notify the Division so that Division personnel can confirm that the violation has been corrected.

Violation No. V116-00211

CCR section 1775(a) states that "Oilfield wastes, including but not limited to oil, water, chemicals, mud, and cement, shall be disposed of in such a manner as not to cause damage to life, health, property, freshwater aquifers or surface waters, or natural resources, or be a menace to public safety. Disposal sites for oilfield wastes shall also conform to State Water Resources Control Board and appropriate California Regional Water Quality Control Board regulations."

CCR section 1777(a) states that "Operators shall maintain production facilities in good condition and in a manner to prevent leakage or corrosion and to safeguard life, health, property, and natural resources."

Soil within the berms around the wash tank and the crude oil tank, and around the chemical drums south of the crude oil tank at Vida Resources LLC "Patel" lease are stained by unremediated spills. Vida Resources LLC must clean up the unremediated spills by July 20, 2016, and notify the Division so that Division personnel can confirm that the violation has been corrected.

Violation No. V116-00212

CCR section 1773.3 states that "Leaking tanks shall be reported to the appropriate Division district office within 48 hours and shall be taken out of service and designated as an Out-of-Service tank."

CCR section 1777(a) states that "Operators shall maintain production facilities in good condition and in a manner to prevent leakage or corrosion and to safeguard life, health, property, and natural resources."

The crude oil tank at Vida Resources LLC "Patel" lease has dried oil on the south side from at least one spill. The hatch on the crude oil tank also indicates that oil has leaked from that tank. Photographs taken during lease inspections on June 4 and August 13, 2015 and do not show staining on the south side or hatch on the crude oil tank. Vida Resources LLC did not inform the Division of the release(s). The Division shall be notified of spills and releases within 48 hours of the release.

Violation No. V116-00213

CCR section 1777(c)(3)states that "Well cellars shall be covered and kept drained. Grating or flooring shall be installed and maintained in good condition so as to exclude people and animals. Cellars should be protected from as much runoff water as practical."

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June 21, 2016

Reports #V116-00207 to #V116-00213

Mr. Chaim Nathan, Agent
Vida Resources LLC (V1305)
Page 3

The well cellar at Vida Resources LLC well "Patel" 2 (037-18961) is not covered and kept drained. Vida Resources LLC must cover the well cellar by July 20, 2016, and notify the Division so that Division personnel can confirm that the violation has been corrected.

Failure to comply with the laws of California and this Division may result in enforcement action including, but not limited to, issuance of a civil penalty and/or order pursuant to Public Resources Code Sections 3106, 3224, 3235 and 3236.5.

If you have any questions, please contact Kathleen Andrews at (714) 816-6847 or kathleen.andrews@conservation.ca.gov.

Sincerely,

Chris McCullough
Environmental and Facilities Unit Supervisor

cc: Daniel J. Dudak, District Deputy
Lease Inspection File
Los Angeles Fire Dept., Station 3, 108 N. Fremont Ave., Los Angeles, CA 90012

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Los Angeles City Field
Temple Resources, LLC

Attachment 2

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State of California • Natural Resources Agency — Edmund G. Brown Jr., *Governor*

Department of Conservation
Division of Oil, Gas, and Geothermal Resources
Southern District
5816 Corporate Avenue • Suite 100
Cypress, CA 90630
(714) 816-6847 • FAX (714) 816-6853

NOTICE OF VIOLATION

February 16, 2018

V118-00036 and V118-00037

CERTIFIED MAIL 7013 1710 0001 9440 8965

Mr. Chaim Nathan, Agent
Vida Resources LLC (V1305)
859 North Virgil Ave. #B
Los Angeles, CA 90029

Dear Mr. Nathan:

OIL SPILL, LOS ANGELES CITY FIELD

On November 4, 2017, Division of Oil, Gas, and Geothermal Resources (Division) engineer Michael Cannon responded to a spill of approximately 30 barrels of oil and water at Vida Resources LLC's, Patel tank facility located at 314 Firmin St., Los Angeles. It was reported to the Division that the spill occurred on or about September 26, 2017. On November 20, 2017, Division Environmental and Facilities engineers, Kathleen Andrews and Stacy Sor, conducted a follow up inspection of the spill to ascertain the spill's cleanup status. On February 14, 2018, Division Environmental and Facilities engineer Max Chavez-Segura performed an inspection of the site to determine if the spill cleanup had been completed.

The inspections revealed that very little activity has occurred since the November 20, 2017 inspection, and remediation of the spill had not been completed. Failure to respond to and immediately cleanup such spills is a violation of the California's Public Resources Code (PRC) and California Code of Regulations (CCR).

Failure to Promptly Report Spill: **V118-00036**

CCR section 1722(h) states "[o]il spills shall be promptly reported to the California Emergency Management Agency by calling the toll-free telephone number (800) 852-7550 and by contacting the agencies specified in the operator's spill contingency plan."

Vida Resources LLC failed to contact the California Office of Emergency Services (California Emergency Management Agency) at the time of its 30-barrel spill, and did not report the spill until after the Division and other agencies had arrived on site to investigate the spill.

Unremediated Spill: **V118-00037**

CCR section 1722(a) states "[a]ll operations shall be conducted in accordance with good oilfield practice."

CCR section 1775(a) states "[o]ilfield wastes, including but not limited to oil, water, chemicals, mud, and cement, shall be disposed of in such a manner as not to cause damage to life, health, property,

freshwater aquifers or surface waters, or natural resources, or be a menace to public safety. Disposal sites for oilfield wastes shall also conform to State Water Resources Control Board and appropriate California Regional Water Quality Control Board regulations."

CCR section 1777(c)(2) states "[w]eeds and debris shall be removed from secondary containment areas or catch basins, and the integrity of all berms shall be inspected monthly. Fluids, including rainwater, shall be removed."

Vida Resources LLC has failed to complete the cleanup and remediation of the spill which reportedly occurred on, or about, September 26, 2017. Vida Resources LLC must clean up the unremediated spill in compliance with all applicable federal, state, and local laws by March 15, 2018.

Failure to comply with the laws of California and this Division may result in enforcement actions including, but not limited to, issuance of a civil penalty and/or order pursuant to PRC sections 3106, 3224, 3235, 3236, and 3236.5.

If you have any questions, please contact Kathleen Andrews at (714) 816-6847 or Kathleen.Andrews@conservation.ca.gov.

Sincerely,

Chris McCullough
Area Supervising Engineer
Environmental and Facilities Unit

cc: Kurt Corral, CUPA Enforcement Coordinator
Los Angeles Fire Department
kurt.corral@lacity.org

Arthur Heath, Environmental Program Manager I
Remediation Section
California Regional Water Quality Control Board, Los Angeles
Arthur.Heath@waterboards.ca.gov

Daniel J. Dudak, District Deputy
Daniel.Dudak@conservation.ca.gov

Kathleen Andrews, Environmental and Facilities Engineer
Kathleen.Andrews@conservation.ca.gov

Vida Resources LLC, Patel Lease File

Patel 2 (037-18961) Well File

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Valley Village, CA 91607
(213) 353-9416

Site Inspection Maps & Photos:
November 4, 2017
314 Firmin Street, Los Angeles, CA
"Patel-2" well site (API: 037-18961)
D.O.G.G.R. Inspector: Michael Cannon



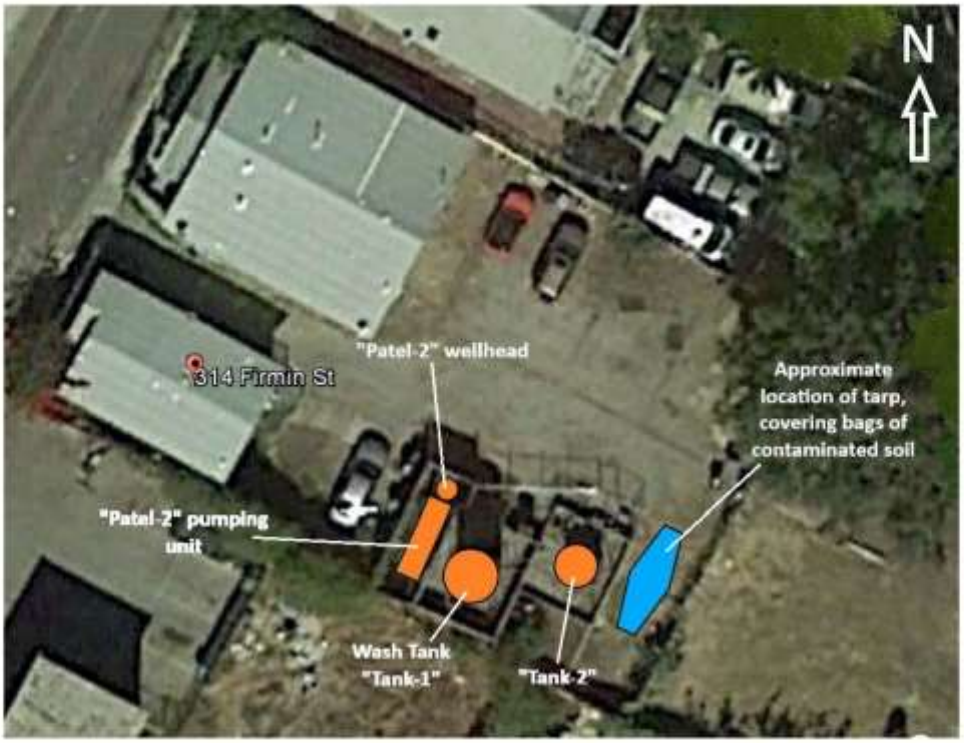
Location Map: D.O.G.G.R. Well Finder map showing location of site: 314 Firmin Street, Los Angeles, CA. Site lies within boundaries of the Los Angeles City Field.

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Satellite Location Map: Google Earth Satellite image showing location of site: 314 Firmin Street, Los Angeles, CA. "Patel-2" well site outlined in yellow.

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Site Map: Google Earth Satellite image showing location of "Patel-2" well and related oilfield equipment: 314 Firmin Street, Los Angeles, CA.

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Photo Location Map: Google Earth Satellite image showing locations of annotated photos taken on November 4, 2017 during DOGGR inspection of the "Patel-2" well site: 314 Firmin Street, Los Angeles, CA.

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Photo 1: Property entrance: 314 Firmin Street, Los Angeles, CA. "Patel-2" wellsite located in rear of residence.

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Photo 2: View to the Southeast from driveway, of "Patel-2" well and tank enclosures.

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Photo 3: Entrance to secondary containment area for wash tank "Tank-1".

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Valley Village, CA 91607
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Photo 4: Bag of oil stained soil removed from secondary containment area of "Tank-1" wash tank, sitting atop blue tarp. Approximately 200 additional bags of the same size filled with contaminated soil in storage underneath blue tarp.

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Photo 5: Hand excavations in NE (left) and SW (right) corners of "Tank-1" secondary containment area.

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Valley Village, CA 91607
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Photo 6: Hand excavation inside NE corner of "Tank-1" secondary containment area. Red arrows show capped ends of flowline, between which a leaky segment was reportedly removed. Reyes stated that a leak in the removed flowline segment was the source of the crude oil on the ground within the containment area.

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Photo 7: Bottom of hand excavation inside NE corner of "Tank-1" secondary containment area. Green arrows highlight crude oil in soil.

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Photo 8: Hand excavation in SW corner of "Tank-1" secondary containment area.

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Photo 9: Hand excavation inside SW corner of "Tank-1" secondary containment area. Green arrows highlight crude oil staining/accumulation on cinderblock wall inside of excavation.

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Photo 10: "Patel-2" wellhead. Oil covering the outside of the stuffing box and wellhead.

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Photo 11: "Patel-2" wellhead. Oil covering the outside of the stuffing box and wellhead. Hole in wellhead at the edge of the tubing, which is leaking gas (right side of tubing, circled in red).

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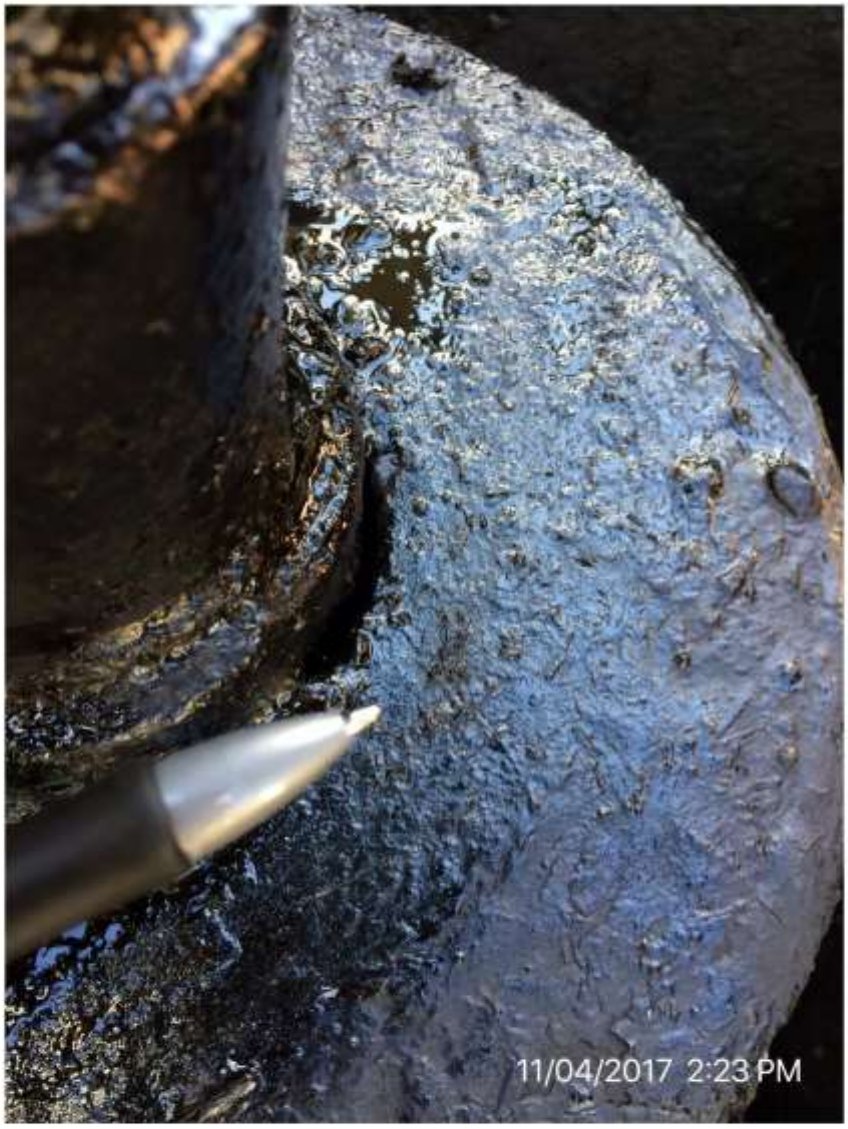


Photo 12: "Patel-2" wellhead; hole in wellhead at edge of tubing, which is leaking gas.

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Los Angeles City Field
Temple Resources, LLC

Attachment 3

MONTES & ASSOCIATES
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Valley Village, CA 91607
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California
Department of Conservation
Division of Oil, Gas, and Geothermal Resources

Gavin Newsom, Governor
David Bunn, Director

April 15, 2019

VIA EMAIL ONLY

Mr. David Nathan, Agent
Vida Resources LLC (V1305)
859 North Virgil Avenue #B
Los Angeles, CA 90029
chaimnathan@sbcglobal.net

Dear Mr. Nathan:

VIOLATION COMPLIANCE, VIOLATION NUMBERS V116-00207 THROUGH V116-00214, AND V118-00036 THROUGH V118-00037, ENVIRONMENTAL LEASE INSPECTION, PATEL LEASE, LOS ANGELES CITY FIELD

On June 21, 2016, the Division of Oil, Gas, and Geothermal Resources (DOGGR) issued a Notice of Violation (NOV) to Vida Resources LLC (Vida Resources) for its Patel lease located within the Los Angeles City field. The NOV addressed several issues including tanks not being properly labelled, leaking flowline and tanks, perimeter fencing not meeting DOGGR's requirements, stained soils, unremediated spills, inadequately covered well cellar, and insufficient bonding. DOGGR issued a second NOV dated February 16, 2018, to Vida Resources for its failure to promptly report and remediate a spill that occurred within the lease on or about September 26, 2017.

On November 4, 2017, DOGGR engineer, Michael Cannon, conducted a site visit to investigate a reported spill at the lease. During his site visit Mr. Cannon noticed a small hole in the flange of the "Patel" 2 (0403718961) wellhead through which gas was coming out. Mr. Cannon immediately brought this to the attention of Vida Resources personnel, who in turn shut the well down. Although DOGGR did not issue a specific NOV for the wellhead issue, the hole in the wellhead is a violation of California Code of Regulation (CCR) section 1777(a), which states "operators shall maintain production facilities in good condition and in a manner to prevent leakage or corrosion and to safeguard life, health, property, and natural resources".

On September 6, 2018, DOGGR engineer, Max Chavez-Segura, conducted a follow-up inspection of the lease and noted several outstanding violations including tanks and associated pipelines not meeting DOGGR's out-of-service requirements, perimeter fencing not having barbed wire mounted at a 45-degree angle from the top of the fence, and well cellar not being properly covered.

On March 12, 2019, DOGGR engineers, Ellen Plaza Moser and Stacy Sor, conducted another follow-up inspection of the Patel lease and observed that the previously noted violations related to the out-of-service tanks and associated pipelines were corrected in

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Valley Village, CA 91607
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accordance with DOGGR's laws. However, violations related to perimeter fencing, weed and overgrown vegetation around the tank facility, and wellhead repair remained outstanding.

On March 21, 2019, DOGGR engineers Stacy Sor and Eric Zimny at the request of Chaim Nathan, conducted another follow-up inspection of the Patel lease. Previously identified violations from field inspections, with the exception of hole in the wellhead, were noted to have been corrected and no additional violations were observed during this inspection.

This letter acknowledges that the violations #V116-00207 through V116-00213, and V118-00037 specified in DOGGR NOVs dated June 21, 2016 and February 16, 2018, have been corrected, and violation #V116-00214 specified in the NOV dated June 21, 2016, has been annulled. However, based upon DOGGR's most recent inspection of the lease, and communication with the operator, the hole in the wellhead has not been repaired and it remains outstanding.

If you have any questions, please contact Ellen Moser at (714) 816-6847, or via email at ellen.moser@conservation.ca.gov.

Thank you for your cooperation.

Sincerely,



Suman Ghosh
Environmental and Facilities Unit Supervisor

cc: Chris McCullough, DOGGR – chris.mccullough@conservation.ca.gov
Taylor Whittemore, DOC – Taylor.Whittemore@conservation.ca.gov
Uduak-Joe Ntuk, Petroleum Administrator, City of Los Angeles – uduak.ntuk@lacity.org
Jessica Brown, Deputy City Attorneys, City of Los Angeles – jessica.brown@lacity.org
Nicholas Karno, Deputy City Attorneys, City of Los Angeles – nick.karno@lacity.org
Lease File

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D — CalGEM (DOGGR) letter, April 15, 2019: "Violation Compliance, Violation Numbers V116-00207 through V116-00214, and V118-00036 through V118-00037, Environmental Lease Inspection, Patel Lease, Los Angeles City Field"

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California
Department of Conservation
Division of Oil, Gas, and Geothermal Resources

Gavin Newsom, Governor
David Bunn, Director

April 15, 2019

VIA EMAIL ONLY

Mr. David Nathan, Agent
Vida Resources LLC (V1305)
859 North Virgil Avenue #B
Los Angeles, CA 90029
chaimnathan@sbcglobal.net

Dear Mr. Nathan:

VIOLATION COMPLIANCE, VIOLATION NUMBERS V116-00207 THROUGH V116-00214, AND V118-00036 THROUGH V118-00037, ENVIRONMENTAL LEASE INSPECTION, PATEL LEASE, LOS ANGELES CITY FIELD

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On March 21, 2019, DOGGR engineers Stacy Sor and Eric Zimny at the request of Chaim Nathan, conducted another follow-up inspection of the Patel lease. Previously identified violations from field inspections, with the exception of hole in the wellhead, were noted to have been corrected and no additional violations were observed during this inspection.

This letter acknowledges that the violations #V116-00207 through V116-00213, and V118-00037 specified in DOGGR NOVs dated June 21, 2016 and February 16, 2018, have been corrected, and violation #V116-00214 specified in the NOV dated June 21, 2016, has been annulled. However, based upon DOGGR's most recent inspection of the lease, and communication with the operator, the hole in the wellhead has not been repaired and it remains outstanding.

If you have any questions, please contact Ellen Moser at (714) 816-6847, or via email at ellen.moser@conservation.ca.gov.

Thank you for your cooperation.

Sincerely,

Digitally signed by Suman Ghosh
Date: 2019.04.15 16:31:02 -07'00'

Suman Ghosh
Environmental and Facilities Unit Supervisor

cc: Chris McCullough, DOGGR – chris.mccullough@conservation.ca.gov
Taylor Whittemore, DOC – Taylor.Whittemore@conservation.ca.gov
Uduak-Joe Ntuk, Petroleum Administrator, City of Los Angeles – uduak.ntuk@lacity.org
Jessica Brown, Deputy City Attorneys, City of Los Angeles – jessica.brown@lacity.org
Nicholas Karno, Deputy City Attorneys, City of Los Angeles – nick.karno@lacity.org
Lease File

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E — CalGEM (DOGGR) letter, June 7, 2019: "Violation Compliance, Environmental Lease Inspection, Patel Lease, Los Angeles City Field"

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California
Department of Conservation
Division of Oil, Gas, and Geothermal Resources

Gavin Newsom, Governor
David Bunn, Director

June 7, 2019

VIA EMAIL ONLY

Mr. David Nathan, Agent
Vida Resources LLC (V1305)
859 North Virgil Ave. #B
Los Angeles, CA 90029
chaimnathan@sbcglobal.net

Dear Mr. Nathan:

VIOLATION COMPLIANCE, ENVIRONMENTAL LEASE INSPECTION, PATEL LEASE, LOS ANGELES CITY FIELD

On May 10th and May 31st, 2019, Division of Oil, Gas, and Geothermal Resources (DOGGR) engineer, Eric Zimny, conducted follow-up inspections of the Patel lease in the Los Angeles City Field. This letter acknowledges that the previously identified violations have been corrected and no new violations were observed during the most recent inspection.

Before placing the production facilities in-service, Vida Resources must comply with all pertinent DOGGR laws including:

- Repairing the damaged (i.e. cracked) secondary containment. (See California Code of Regulations (CCR) 1773.1).
- Testing all tanks for bottom plate and side wall thicknesses, as required. (See CCR 1773.4).
- Meeting all in-Service tank and pipeline requirements for notification, maintenance, inspection, and testing. (See CCR 1773.2, 1773.3, 1773.4, 1774, 1774.1, and 1774.2).

If you have any questions, please contact Ellen Plaza Moser at (714) 816-6847 or ellen.moser@conservation.ca.gov.

Thank you for your cooperation.

Sincerely,

Digitally signed by Suman Ghosh
Date: 2019.06.07 16:16:56 -07'00'

Suman Ghosh
Environmental and Facilities Unit Supervisor

State of California Natural Resources Agency | Department of Conservation
Southern District, 3780 Kilroy Airport Way, Suite 400, Long Beach, CA 90806
conservation.ca.gov | T: (714) 816-6847 | F: (714) 816-6853

Mr. David Nathan, Agent
Vida Resources LLC (V1305)
June 7, 2019

cc: Chris McCullough, DOGGR – chris.mccullough@conservation.ca.gov
Taylor Whittemore, DOC – Taylor.Whittemore@conservation.ca.gov
Uduak-Joe Ntuk, Petroleum Administrator, City of Los Angeles – uduak.ntuk@lacity.org
Jessica Brown, Deputy City Attorneys, City of Los Angeles – jessica.brown@lacity.org
Nicholas Karno, Deputy City Attorneys, City of Los Angeles – nick.karno@lacity.org
Lease File

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F — CalGEM field memorandum, May 10, 2019

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California
Department of Conservation
Division of Oil, Gas, and Geothermal Resources

Gavin Newsom, Governor
David Bunn, Director

MEMORANDUM

DATE: 5/10/2019

TO: Patel Lease File

FROM: Eric Zimny
Engineering Geologist

SUBJECT: Inspection Summary of Patel Lease

Name of Inspector: Eric Zimny

Date of Inspection: 5/10/2019

Operator Name: Vida Resources LLC

Field Name: Los Angeles City

Inspection Attendees: David Nathan, Vida Resources LLC

Inspection Summary:

The well site, associated pipelines, tank facilities, and enclosure were inspected. No violations were observed.

State of California Natural Resources Agency | Department of Conservation
Southern District, 5816 Corporate Avenue, Suite 100, Cypress, CA 90630
conservation.ca.gov | T: (714) 816-6847 | F: (714) 816-6853

G — CalGEM memorandum documenting rebuilt containment, December 18, 2019

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California
Department of Conservation
Division of Oil, Gas, & Geothermal Resources

Gavin Newsom, Governor
David Shabazian, Director
Southern District
3780 Kilroy Airport Way, Ste. 400
Long Beach, CA 90806
T: (562) 637-4400 | F: (562) 424-0166
conservation.ca.gov

MEMORANDUM

DATE: DECEMBER 18, 2019
TO: Wassim Estwani
Senior Oil and Gas Engineer Supervisor
Vida Resources LLC Facilities File

FROM: MAX CHAVEZ-SEGURA

Max Chavez-Segura
Digitally signed by Max Chavez-Segura
Date: 2019.12.23 09:34:12 -08'00'

SUBJECT: Follow-up Inspection of Vida Resources LLC's Patel Lease- Los Angeles Field

Background:

On or around November 27, 2019, The Division of Oil, Gas, and Geothermal Resources (DOGGR) received a complaint regarding possible well work at Vida Resources, LLC's Well No. "Patel" 2 (037-18961).

As a result, on December 3, 2019, Paula Matt (DOGGR, Engineering Geologist) conducted an inspection of Vida Resources LLC's Patel Lease located in the backyard of 314 Firmin Street, Los Angeles, CA 90026 (Inspection ID No. 90297534). Ms. Matt found that a working crew was in the process of pouring cement for a new tank pad, she also found that "Wash Tank 1" had been temporarily removed; she found no evidence of well work.

Inspection Summary:

On December 18, 2019, DOGGR Energy and Mineral Resources Engineers Stacy Sor and Max Chavez-Segura conducted a follow-up inspection of Vida Resources, LLC's Patel Lease in the city of Los Angeles. At the time of our inspection we found no working crew present; we also found that "Wash Tank 1" had been re-installed on the new cement foundation within the secondary containment (Photo 1). We also found a recently-poured cement pad around the "Wash Tank 1" new foundation (Photos 2, 3, & 4). We found no evidence of well work being performed (Phot 5). The pumping unit was not active at the time of our inspection.

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PHOTO 1 Vida Resources, LLC's Patel Lease. Wash Tank 1, and Well No. "Patel" 2 (037-18961).

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PHOTO 2 Wash Tank 1- Secondary containment cement pad (western boundary).

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Valley Village, CA 91607
(213) 353-9416

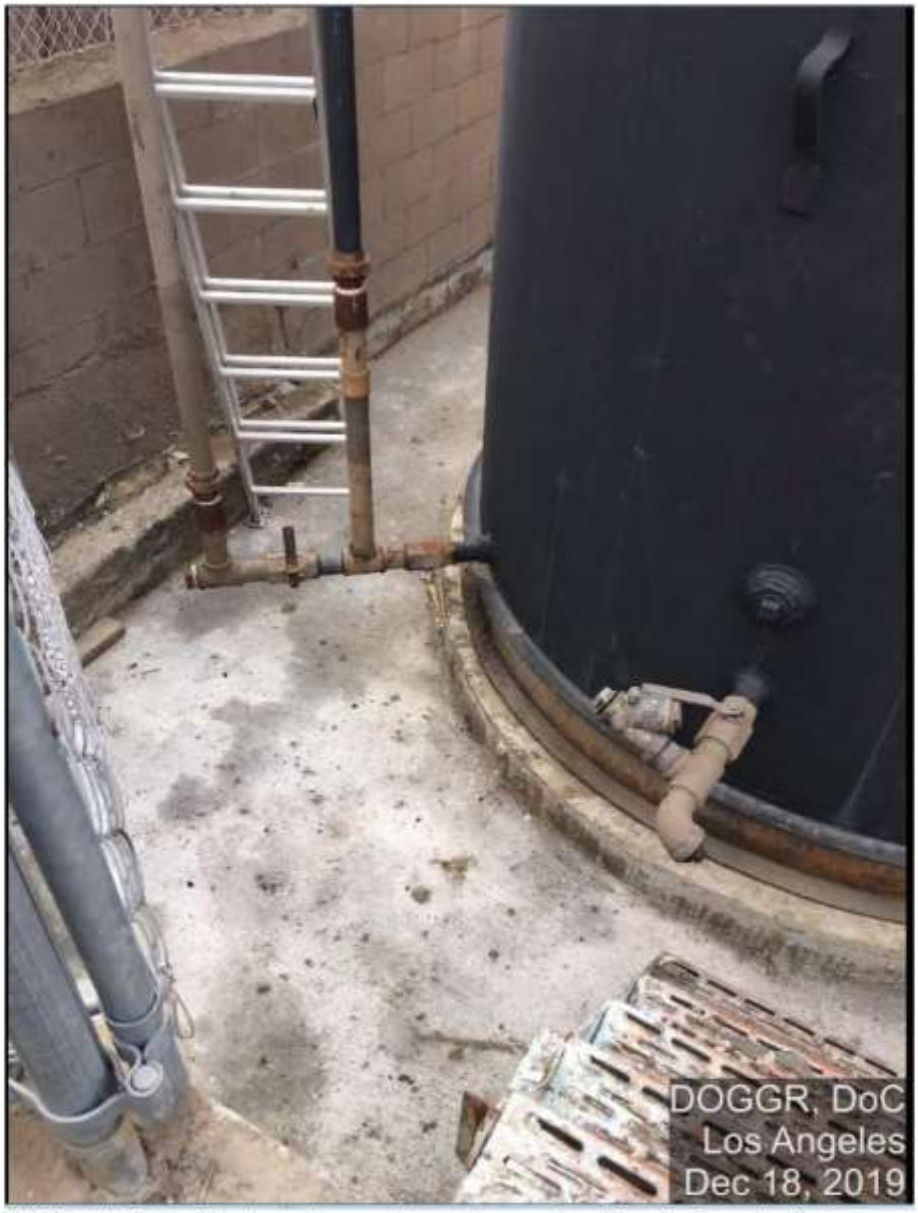


PHOTO 3 Wash Tank 1 - Secondary containment cement pad (eastern boundary).

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PHOTO 4 Wash Tank 1 - Secondary containment cement pad (southern boundary).

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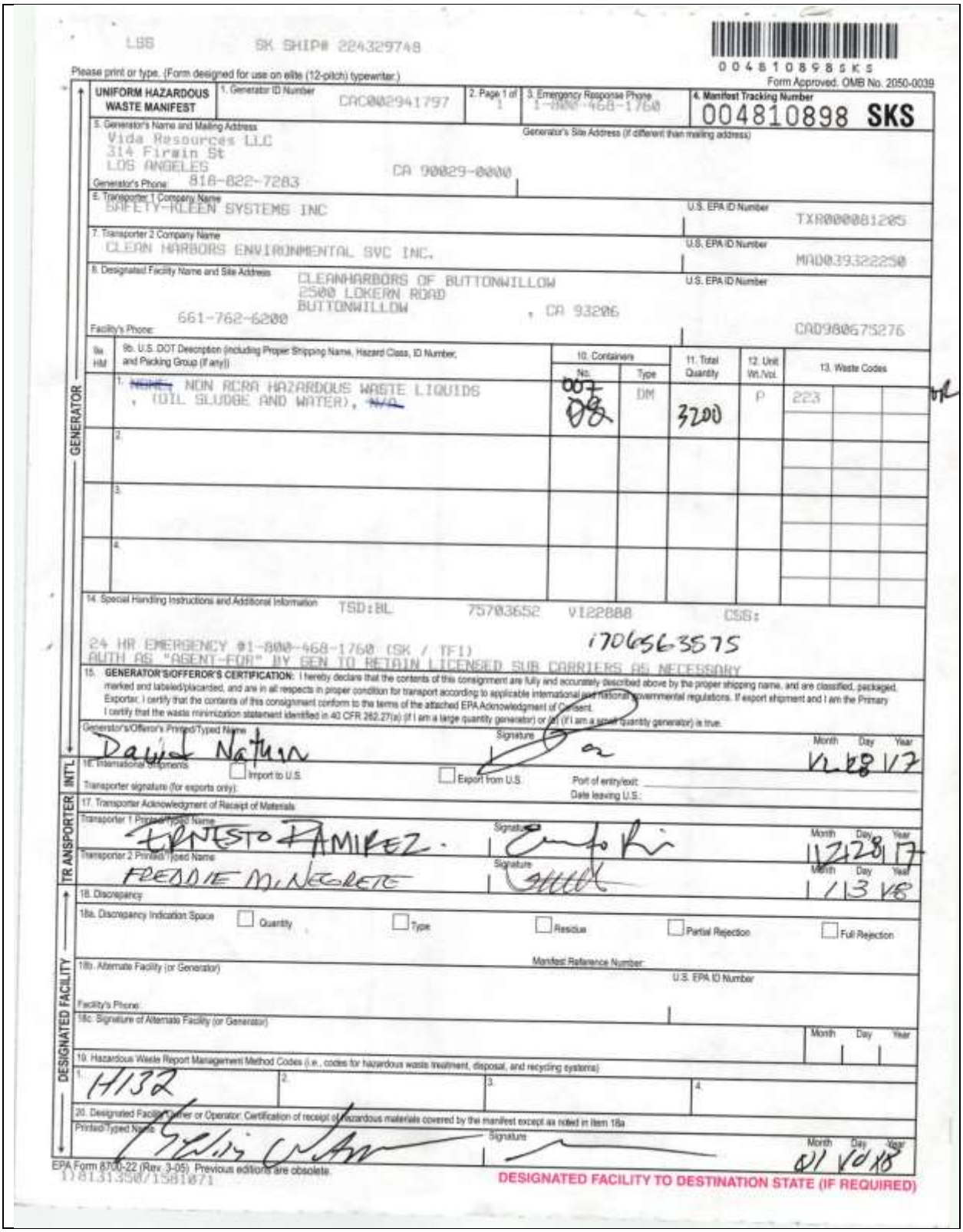


PHOTO 5 Vida Resources, LLC's Patel Lease – No workover rig on site.

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H — Uniform Hazardous Waste Manifest No. 004810898 SKS (generator signed December 28, 2017) and generator waste report, 2017-2020

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Valley Village, CA 91607
(213) 353-9416



LSS SK SHIP# 224329748

0048108985KS

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: CAC002941797 | 2. Page 1 of: 1 | 3. Emergency Response Phone: 1-800-468-1760 | 4. Manifest Tracking Number: 004810898 SKS

5. Generator's Name and Mailing Address: Vida Resources LLC, 314 Firmin St, LOS ANGELES, CA 90029-0000 | Generator's Site Address (if different than mailing address)

Generator's Phone: 818-822-7283

6. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS INC | U.S. EPA ID Number: TXR000081285

7. Transporter 2 Company Name: CLEAN HARBORS ENVIRONMENTAL SVC INC. | U.S. EPA ID Number: MAD039322250

8. Designated Facility Name and Site Address: CLEANHARBORS OF BUTTONWILLOW, 2500 LOKERN ROAD, BUTTONWILLOW, CA 93206 | U.S. EPA ID Number: CAD980675276

Facility's Phone: 661-762-6200

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers: No.	10. Containers: Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. ~~NONE~~ NON RCRA HAZARDOUS WASTE LIQUIDS, (OIL SLUDGE AND WATER), ~~N/A~~	007 DB	DM	3200	P	223
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information: TSD:BL 75703652 VI22888 CSS: i706563575

24 HR EMERGENCY #1-800-468-1760 (SK / TFI)
AUTH AS "AGENT-FOR" BY GEN TO RETAIN LICENSED SUB CARRIERS AS NECESSARY

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: David Nathan | Signature | Month 12 Day 28 Year 17

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:

Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: ERNESTO RAMIREZ. | Signature | Month 12 Day 28 Year 17

Transporter 2 Printed/Typed Name: FREDDIE M. NEGRETE | Signature | Month 1 Day 3 Year 18

18. Discrepancy

18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) | U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) | Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

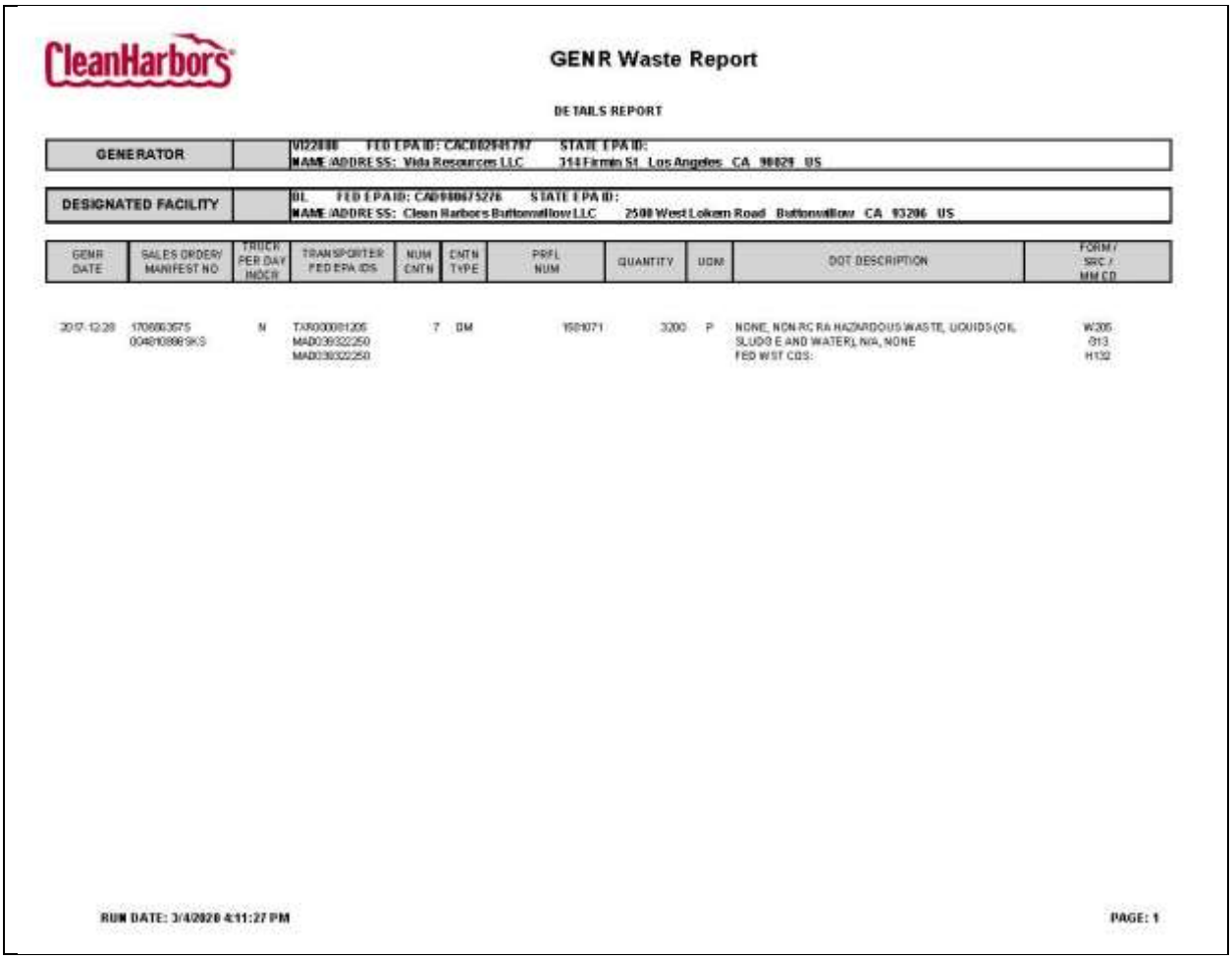
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20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 18a

Printed/Typed Name: [illegible] | Signature | Month 01 Day 04 Year 18

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. 1781313S0/1581071

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)



CleanHarbors

GENR Waste Report

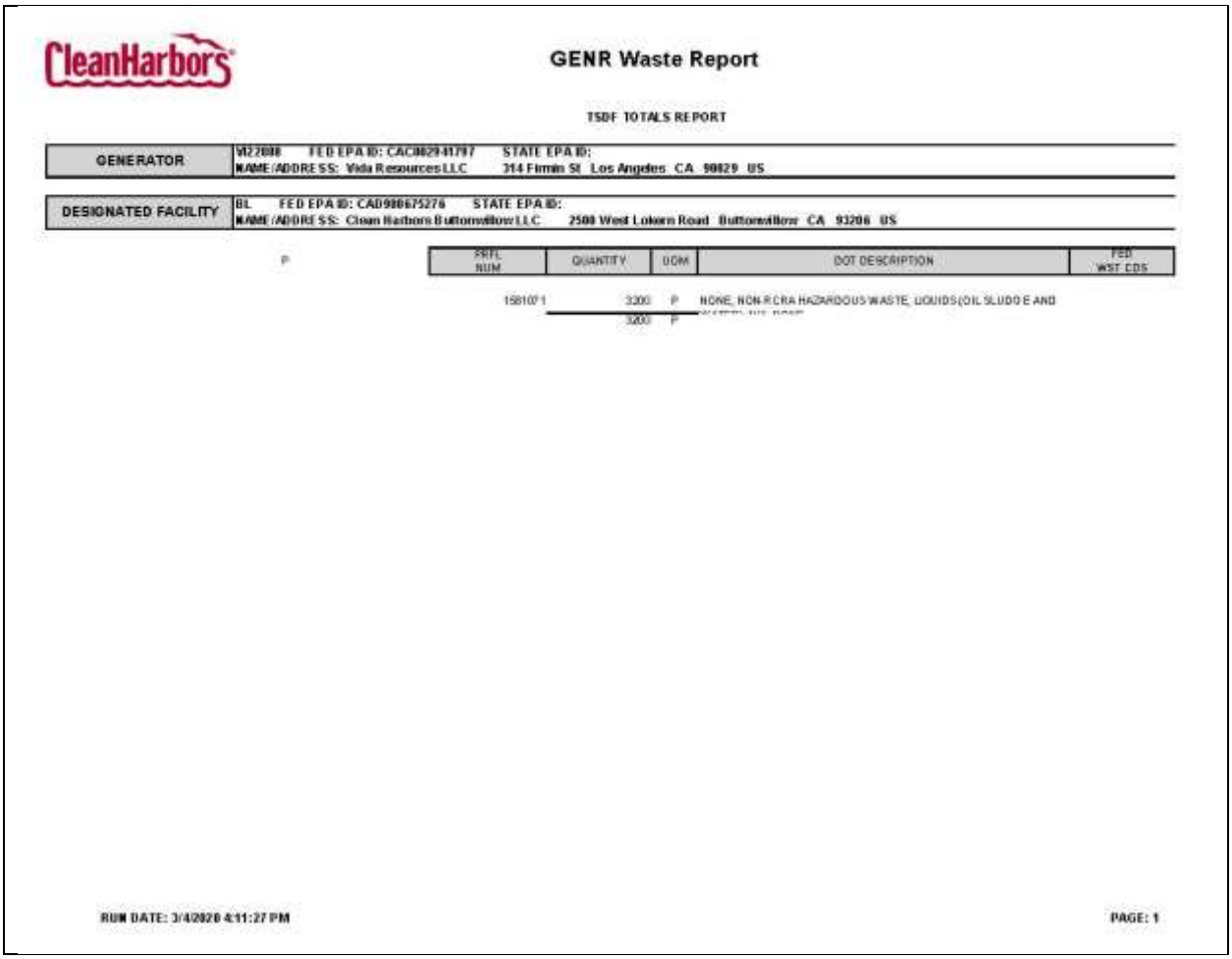
DETAILS REPORT

GENERATOR		VI22838 FED EPA ID: CACB02941797 STATE EPA ID: NAME/ADDRESS: Vida Resources LLC 114 Firmin St Los Angeles CA 90029 US
DESIGNATED FACILITY		0L FED EPA ID: CAD980875276 STATE EPA ID: NAME/ADDRESS: Clean Harbors Buttonwillow LLC 2500 West Lokern Road Buttonwillow CA 93206 US

GENR DATE	SALES ORDER/ MANIFEST NO	TRUCK PER DAY INDCR	TRANSPORTER FED EPA IDS	NUM CNTR	CNTR TYPE	PRFL NUM	QUANTITY	UOM	DOT DESCRIPTION	FORM / SRC / MM CD
2017-12-28	1706863575 004910899KS	N	TXR000081205 MAD039322250 MAD039322250	7	DM	1591071	3200	P	NONE, NON RCRA HAZARDOUS WASTE, LIQUIDS (OIL SLUDGE AND WATER), NA, NONE FED WST CDS:	W205 013 H132

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PAGE: 1



GENR Waste Report

TSDF TOTALS REPORT

GENERATOR	112888 FED EPA ID: CAC002941797 STATE EPA ID: NAME/ADDRESS: Vida Resources LLC 314 Firmin St Los Angeles CA 90029 US
DESIGNATED FACILITY	BL FED EPA ID: CAD980675276 STATE EPA ID: NAME/ADDRESS: Clean Harbors Buttonwillow LLC 2500 West Lokern Road Buttonwillow CA 93206 US

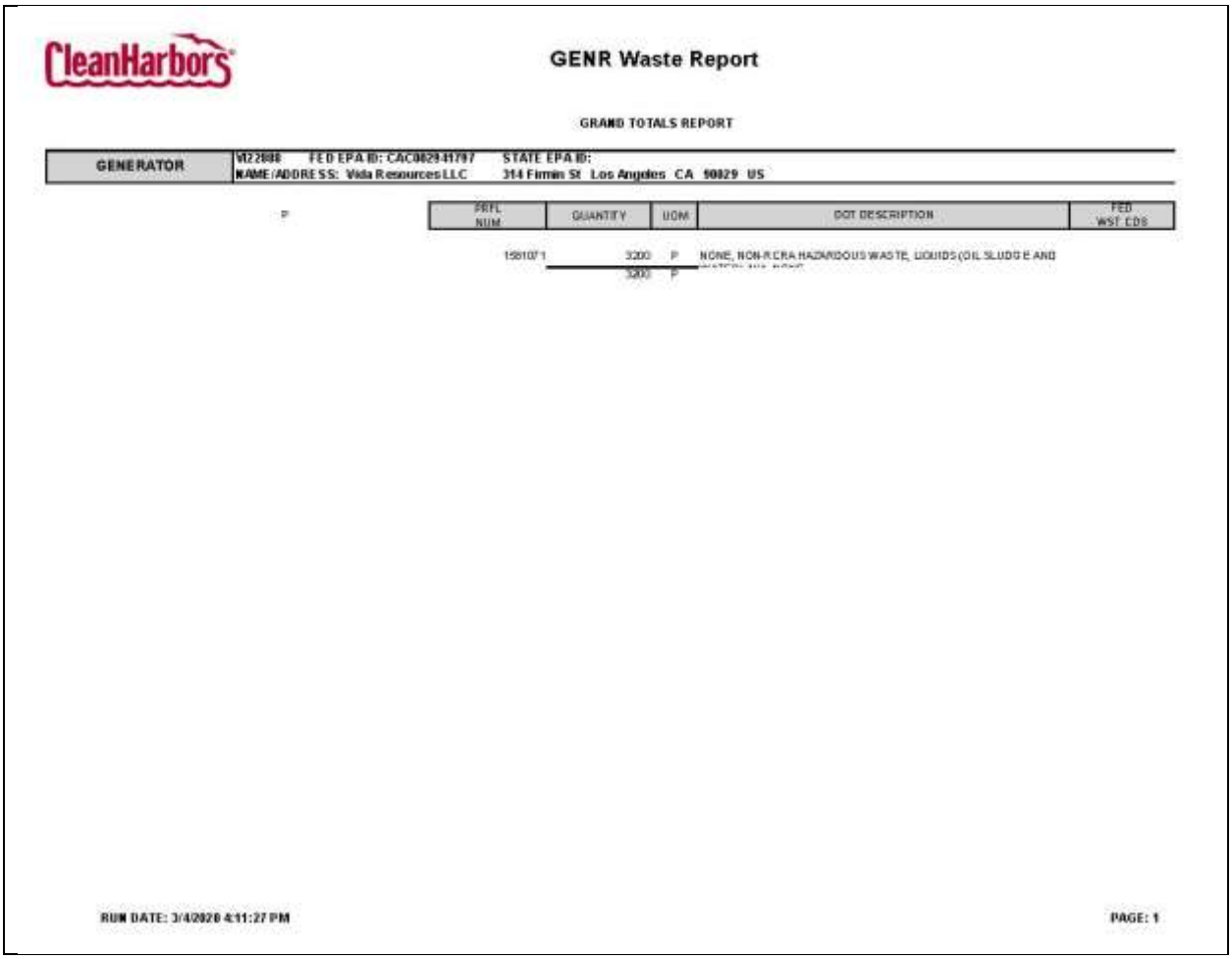
P

PRTL NUM	QUANTITY	UOM	DOT DESCRIPTION	FED WST CDS
158107 1	3200	P	NONE, NON-RCRA HAZARDOUS WASTE, LIQUIDS (OIL SLUDGE AND	
	3200	P		

RUN DATE: 3/4/2020 4:11:27 PM

PAGE: 1

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12520 Magnolia Blvd.,
Valley Village, CA 91607
(213) 353-9416



GENR Waste Report

GRAND TOTALS REPORT

GENERATOR	VI22698 FED EPA ID: CAC002941797 STATE EPA ID:
	NAME/ADDRESS: Vida Resources LLC 314 Firmin St Los Angeles CA 90029 US

	PRFL NUM	QUANTITY	UOM	DOT DESCRIPTION	FED WST CDS
P					
	158107 1	3200	P	NONE, NON-R CRA HAZARDOUS WASTE, LIQUIDS (OIL SLUDGE AND	
		3200	P		

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PAGE: 1

MONTES & ASSOCIATES
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Valley Village, CA 91607
(213) 353-9416

I — DOGGR photographs of the rebuilt containment, December 18, 2019, 10:41 a.m.

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J — Regional Board letter to Neda Tafi, CalGEM, December 8, 2025: "Review of the Site Stabilization Plan Patel Lease and Los Angeles City Field, Los Angeles Co., Temple Resources, LLC Phase 2 Findings Report" (signed Kevin Tomita, P.G.; cc Pete Beskas, CalGEM Southern District, and Ching-Yin To, Los Angeles Water Board)

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Water Boards

Gavin Newsom
Governor

Yana Garcia
Secretary for Environmental Protection

Los Angeles Regional Water Quality Control Board

December 8, 2025

Ms. Neda Tafi
California Department of Conservation
Geologic Energy Management
Division 3780 Kilroy Airport Way, Suite 400
Long Beach, California, 90806

SUBJECT: REVIEW OF THE SITE STABILIZATION PLAN PATEL LEASE AND LOS ANGELES CITY FIELD, LOS ANGELES CO., TEMPLE RESOURCES, LLC PHASE 2 FINDINGS REPORT

SITE: PATEL LEASE, 314 FIRMIN STREET, LOS ANGELES, CALIFORNIA, 90026

Dear Ms. Tafi:

On October 28, 2025, California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board) received the following documents: 1.) *Site Stabilization Plan* (SSP), dated October 22, 2025, prepared by Driltek, Inc. on behalf of California Department of Conservation Geologic Energy Management Division (CalGEM) and 2.) Los Angeles City Field, Temple Resources, LLC, Phase 2 Findings Report (Phase 2), for the Patel Lease, 314 Firmin Street, Los Angeles, California 90026 (Site). On November 4, 2025, the Los Angeles Water Board received the following letter, *Potential Soil Contamination at Temple Resources LLC, Patel Tank Farm, Los Angeles City Field* (referral letter), dated November 3, 2025, by email from CalGEM.

This letter provides our review, summary, and our comments for the SSP, Phase 2, and referral letter.

SSP Summary

The SSP presents the nature of the work to be performed, expected site conditions, general work execution methodologies and approaches, and expected results. The primary objective of the work is to stabilize the well site. Environmental assessment and remedial actions on the site to support current and future land use are not described in the SSP.

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The well is in the backyard of two residences and is surrounded by residential homes with an undeveloped lot to the east. The well is located on Assessor's Parcel Number (APN) is 5160-022-021 with a physical address of 314 Fermin Street, Los Angeles, California 90026. The Site is comprised of a single active oil and gas well along with two-tank processing battery. The tank battery is surrounded by secondary containment and has some concrete foundations and flooring.

The planned activity to stabilize the site includes the abandonment of the well, demolition and removal of the tank battery, removal of all oil field related equipment and materials, isolations and removal of utility services to their service point. Specific well abandonment work are described in the individual well workplans and permit applications (CalGEM Notice of Intention). Demolition equipment will be used to remove the tank battery and oil field related equipment. Utilities supporting the tank battery will be isolated and disconnected. The tanks will be cleaned and drained prior to demolition. Containment walls, floors, and pads will be removed. Most of the interconnected piping is above grade, these will be flushed and removed. If other piping systems are encountered, they will be flushed and removed or isolated and capped. Loose equipment, piping, and general oil field related refuse will be removed.

After demolition of the tank battery and related equipment, the well will be plugged and abandoned, the well cellar will be removed, the well casing will be cut five feet below grade and capped with a steel identification plate, and then the well location will be backfilled. A waste management and recycling plan will be developed for the demolition and well abandonment activities.

Phase 2 Summary

This report presents investigations findings, including observations of outstanding issues or areas of concern such as significant environmental impacts. The oil and gas well is operated by Vida Resources, LLC. This site has had several notices of violations (NOVs) issued by CalGEM which are summarized below:

- NOV issued June 21, 2016 – Site inspection notes include observation of oil-impacted soil within the tank containment area around both the wash and crude tanks, and around drums stored to the south of the crude tank. This NOV directed Vida Resources, LLC to clean up the impacted soil by July 20, 2016, and to notify CalGEM so that CalGEM personnel could confirm clean up.

  This NOV also referenced earlier lease inspections and deduced that a spill related to the crude oil tank likely occurred after August 2015. Vida Resources, LLC was additionally cited for negligence in failing to report the spill within 48 hours.

- NOV issued February 16, 2018 – On November 4, 2017, CalGEM responded to a spill of approximately 30 barrels of oil and water. The operator was directed to clean up the site. Subsequent inspections by CalGEM (on November 20, 2017,

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and February 14, 2018) revealed that little cleanup activity had occurred and remediation of the spill had not been fully completed. The NOV dated February 16, 2018, was issued to Vida Resources, LLC.

- NOV issued September 4, 2025 – CalGEM conducted an inspection in response to a complaint on August 27, 2025. During the inspection a detection of fugitive gas emissions from the wash tank was observed. There were also outstanding compliance issues and evidence of oil-impacted soils on the site.

Referral Letter

The referral letter documents the most recent site inspection by the Los Angeles Fire Department (LAFD) on August 26, 2025, and follow up inspection by CalGEM on August 27, 2025. During the inspection by LAFD, the LAFD inspector noted several environmental concerns and a possible unreported spill of oil onto an unpaved area surrounding the tank farm. CalGEM conducted a follow-up site inspection on August 27, 2025, in response to the concerns from the LAFD inspection. Due to vegetation overgrowth, CalGEM personnel did not observe evidence of oil in the area. However, CalGEM personnel did observe older and saturated oil-stained soil on the unpaved ground surface and an active fluid drip from piping. CalGEM issued a NOV to fix the drip and clean up the soil. The drip was fixed, but the oil-stained soil has not been cleaned up.

CalGEM does not have the expertise or practice of soil and/or groundwater contamination investigation and/or remediation. CalGEM requests that the Los Angeles Water Board investigate the Site and instruct the operator on necessary steps to ensure the site soil does not pose a risk or hazard to human health and/or environment.

LOS ANGELES WATER BOARD REVIEW AND COMMENTS

Based on our review of the reports, the Los Angeles Water Board has the following comments:

1. Based on our review of the SSP, the procedures are sound, and adequate controls are in place to contain an unexpected release to the environment during plugging and abandonment.

2. The Los Angeles Water Board conducted a site walk on November 24, 2025, to become familiar with Site conditions. Los Angeles Water Board staff were unable to enter the property but observed the Site from the street. The oil derrick was observed to be active.

3. To support the effort to investigate the Site, the Los Angeles Water Board requests that CalGEM provide the following:

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a. During demolition of the oil field equipment, six (6) soil samples at a minimum, should be collected beneath and around the tank containment and in areas of oil-impacted soil as noted in the NOVs. Two (2) of the six samples should be collected beneath the tank containment.

b. Soil samples should be analyzed for total petroleum hydrocarbons and volatile organic compounds.

c. Los Angeles Water Board requests that CalGEM notify the undersigned at least 14 days prior to demolition and well abandonment. Please contact the undersigned Los Angeles Water Board staff to discuss sampling strategy.

d. The laboratory report(s) and any other documentation (i.e. scaled maps showing the locations and the approximate depths of samples) pertaining to the soil sampling should be shared with the Los Angeles Water Board within 30-days after the samples are collected.

We appreciate the opportunity to review the document. If you have any questions regarding this letter, please contact Mr. Kevin Tomita, Engineering Geologist, at (213) 576-6714 (kevin.tomita@waterboards.ca.gov) or Ms. Jillian Ly, Remediation Section II Manager, at (213) 576-6664 (jillian.ly@waterboards.ca.gov).

Sincerely,

Kevin Tomita
Digitally signed by Kevin Tomita
Date: 2025.12.08 10:04:30 -08'00'

Kevin Tomita P.G.
Engineering Geologist
Site Cleanup Program Unit III

cc (via email):
Pete Beskas, California Geologic Energy Management, Southern District
Ching-Yin To, Los Angeles Water Board

K — Email thread, Tomita-Tafi, December 8-9, 2025, as forwarded by Neda Tafi to Renee Weigand on January 12, 2026

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From: Tafi, Neda@DOC
Sent: Monday, January 12, 2026 11:48 AM
To: Weigand, Renee@DOC
Cc: Ghosh, Suman@DOC; Awoleke, Olurotimi@DOC
Subject: FW: SSP Review - Temple Resources - 314 Firmin Street, Los Angeles, CA
Attachments: FW: SSP Review - Temple Resources - 314 Firmin Street, Los Angeles, CA

Hi Renee,

Per your request via Microsoft Teams regarding Water Board communication, please see the attached email and the correspondence below.

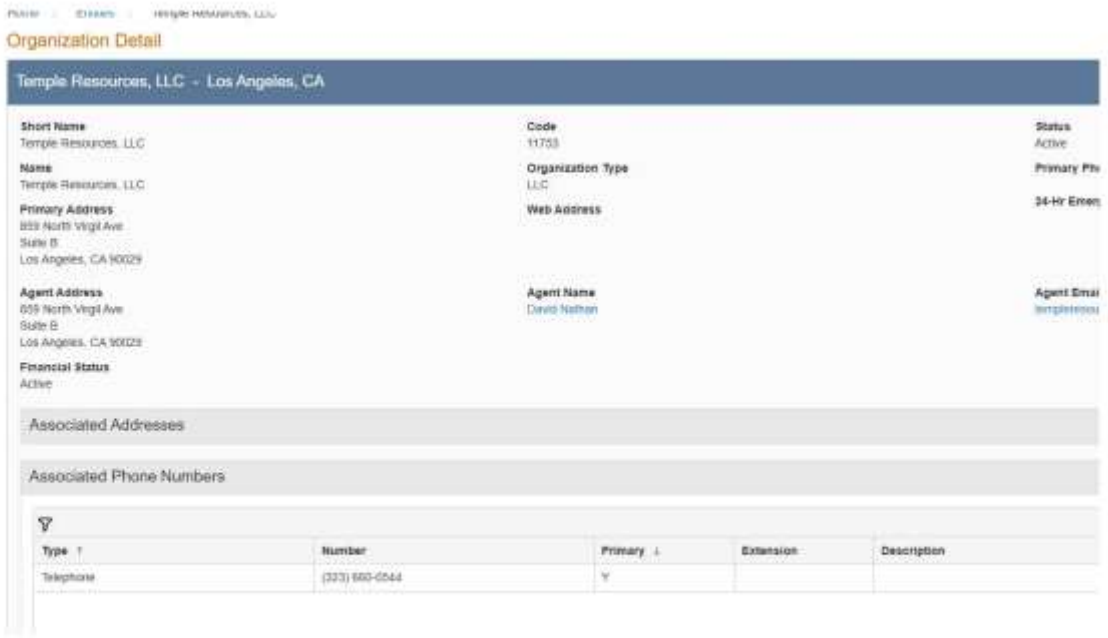
Best Regards,
Neda Tafi

From: Tafi, Neda@DOC
Sent: Tuesday, December 9, 2025 10:57 AM
To: 'Tomita, Kevin@Waterboards' <Kevin.Tomita@Waterboards.ca.gov>
Cc: Beskas, Pete@DOC <Pete.Beskas@conservation.ca.gov>; Awoleke, Olurotimi@DOC <Olurotimi.Awoleke@conservation.ca.gov>; Ghosh, Suman@DOC <Suman.Ghosh@conservation.ca.gov>; Miller, Lindsey@DOC <Lindsey.Miller@conservation.ca.gov>; Cooper, Marc@DOC <Marc.Cooper@conservation.ca.gov>; Abdulrahman, Abdulmageed@DOC <Abdulmageed.Abdulrahman@conservation.ca.gov>; Schaaf, Robert@DOC <Robert.Schaaf@conservation.ca.gov>; Ghobadi, Mehran@DOC <Mehran.Ghobadi@conservation.ca.gov>; Emuh, Melissa@DOC <Melissa.Emuh@conservation.ca.gov>
Subject: RE: SSP Review - Temple Resources - 314 Firmin Street, Los Angeles, CA

Thank you Kevin.
Please note, as you and I discussed earlier, that this project is not a state abandonment of an orphan well, it is an enforcement action over an active operator. Please work directly with the operator for any sampling requirements.

Please find operator information below:

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Organization Detail

Temple Resources, LLC - Los Angeles, CA

Short Name Temple Resources, LLC	**Code** 11753	**Status** Active
Name Temple Resources, LLC	**Organization Type** LLC	**Primary Ph**
Primary Address 859 North Vigil Ave Suite B Los Angeles, CA 90029	**Web Address**	**24-Hr Emer**
Agent Address 859 North Vigil Ave Suite B Los Angeles, CA 90029	**Agent Name** David Nathan	**Agent Emai**
Financial Status Active		

Associated Addresses

Associated Phone Numbers

Type	Number	Primary	Extension	Description
Telephone	(323) 660-0544	Y		

Best Regards,
Neda Tafi

From: Tomita, Kevin@Waterboards <Kevin.Tomita@Waterboards.ca.gov>
Sent: Tuesday, December 9, 2025 8:24 AM
To: Tafi, Neda@DOC <Neda.Tafi@conservation.ca.gov>
Cc: Ghobadi, Mehran@DOC <Mehran.Ghobadi@conservation.ca.gov>; Emuh, Melissa@DOC <Melissa.Emuh@conservation.ca.gov>; Cooper, Marc@DOC <Marc.Cooper@conservation.ca.gov>; Lane H Linthicum (Lane.Linthicum@Driltek.com) <lane.linthicum@driltek.com>
Subject: RE: SSP Review - Temple Resources - 314 Firmin Street, Los Angeles, CA

Good morning Neda,

I conducted a site visit yesterday. I met with Christopher Smart to discuss sampling strategy. I also provided him a copy of the letter you received. Based on the letter and observations made during the site visit, we would like to have CalGEM collect soil samples beneath and around the secondary containment areas. I think it would be best to collect the samples during removal of the secondary containment. Are you able to have staff collect soil samples?

Kevin Tomita, P.G.
Los Angeles Water Quality Control Board
Site Cleanup Unit III
Office: (213)-576-6714

From: Lane H. Linthicum <lane.linthicum@driltek.com>
Sent: Monday, December 8, 2025 8:50 PM
To: Tafi, Neda@DOC <Neda.Tafi@conservation.ca.gov>

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Cc: Tomita, Kevin@Waterboards <Kevin.Tomita@Waterboards.ca.gov>; Ghobadi, Mehran@DOC <Mehran.Ghobadi@conservation.ca.gov>; Emuh, Melissa@DOC <Melissa.Emuh@conservation.ca.gov>; Cooper, Marc@DOC <Marc.Cooper@conservation.ca.gov>
Subject: RE: SSP Review - Temple Resources - 314 Firmin Street, Los Angeles, CA

Caution: External Email. Use caution when clicking links or opening attachments. When in doubt, contact DIT or use the Phish Alert Button.

Neda,

Thank you for the heads up.

Kevin, your letter requests notification 14 days prior to demolition and well abandonment. The facilities at the site have been removed and we are set to start the well abandonment tomorrow.

Let me know if you need anything regarding site visit, etc.

Thank you,

Lane H. Linthicum
Driltek, Inc.
661-281-8074

From: Tafi, Neda@DOC <Neda.Tafi@conservation.ca.gov>
Sent: Monday, December 8, 2025 8:36 PM
To: Lane H. Linthicum <lane.linthicum@driltek.com>
Cc: Tomita, Kevin@Waterboards <Kevin.Tomita@Waterboards.ca.gov>; Ghobadi, Mehran@DOC <Mehran.Ghobadi@conservation.ca.gov>; Emuh, Melissa@DOC <Melissa.Emuh@conservation.ca.gov>; Cooper, Marc@DOC <Marc.Cooper@conservation.ca.gov>
Subject: FW: SSP Review - Temple Resources - 314 Firmin Street, Los Angeles, CA

Hi Lane,

Please review the attached letter and let us know if you have any questions. Last week, I spoke to Kevin, and he mentioned that he may do a site visit tomorrow. Please inform your team in case he needs any assistance.

Best Regards,
Neda Tafi

From: Tomita, Kevin@Waterboards <Kevin.Tomita@Waterboards.ca.gov>
Sent: Monday, December 8, 2025 10:08 AM
To: Tafi, Neda@DOC <Neda.Tafi@conservation.ca.gov>
Cc: Beskas, Pete@DOC <Pete.Beskas@conservation.ca.gov>; To, Ching-Yin@Waterboards <Ching-Yin.To@waterboards.ca.gov>; Ly, Jillian@Waterboards <Jillian.Ly@waterboards.ca.gov>
Subject: SSP Review - Temple Resources - 314 Firmin Street, Los Angeles, CA

Dear Neda,

Attached, please find correspondence from Los Angeles Regional Water Quality Control Board's (Los Angeles Water Board) Cost Recovery Program with PDF format through email. Your acknowledgement of receiving this email is

3

requested. If you are no longer an interested party, please kindly reply to this email and we'll remove your email address from the cc list.

The attached document is in Adobe Acrobat PDF format. You can obtain an Acrobat Reader free of charge at http://www.adobe.com/products/acrobat/readstep2.html

Please contact the undersigned, if you have any questions.



Kevin Tomita P.G.
Engineering Geologist

R4 LOS ANGELES
R4 Remediation II | R4 Site Cleanup III

Email: Kevin.Tomita@Waterboards.ca.gov
Phone: +1 (213) 576-6714

Regional Water Quality Control Boards
320 West Fourth Street, Suite 200, Los Angeles CA 90013
Website: www.waterboards.ca.gov

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L-1 — CalGEM photographs TC_00020, TC_00022-TC_00025, TC_00028 (December 23, 2025, 4:15-4:17 p.m., S. O'Farrell)

L-2 — CalGEM photographs TC_00042-TC_00044 (January 6, 2026, 8:09-8:10 a.m.)

L-3 — CalGEM photographs TC_00048, TC_00053 (January 8, 2026, 9:05 and 9:51 a.m.)

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M — Daily Abandonment Reports, Patel 2, December 3, 2025 and January 5, 2026

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DRILTEK

Daily Abandonment Report

Company:	CalGEM	Date:	1/5/2026
Lease:	Patel	Well:	2
Rig #:	3	Day:	10

Summary of Daily Activities: Move production rig onto location. Spot rig and raise mast. RIH and tag TOC at 447'. Pump 58.8 CuFt/48.2 sxs at 15.8 ppg Class G cement w/ 0.5 gps Latex and 1/2 sx Cellaflex from 447' to 347'. POH. Setup sound panelling. Clean and secure location. SDFN.

Forecast: RIH and tag TOC. Pump 100' cement plug and WOC. Secure location. SDFN.

Start	End	Hours	Detail
6:00	7:30	1.5	JSA and RIH with Drillers, DOGM, and service personnel. Travel on rig to Patel 2 site.
7:30	14:15	6.75	Remove plates covering well. Utilize gravel to stabilize location for spotting trucks. Spot rig onto Patel 2, raise mast, and rig up guy lines.
14:15	15:00	1.25	P/U work string and tag TOC at 447'. CalGEM rep. witness TOC tag.
15:00	16:15	0.75	Pump 58.8 CuFt/48.2 sxs at 15.8 ppg Class G cement w/ 0.5 gps Latex and 1/2 sx Cellaflex from 447' to 347'. No returns during cement job. NO fluid breach at surface. Displace cement with 1 bbls of water.
16:15	17:45	1.5	POH. WOC. Setup sound panelling around location.
17:45	18:00	0.25	Secure well and clean location. SDFN.
			No gas readings detected throughout day with 4 gas monitor, security detail given monitor to conduct readings overnight.

Daily Hours:	13.00	Daily Cost:	$ 60,997	10% Contingency	$ 6,100	Total:	$ 67,097
Total Hours:	188.75				Total Well Field Estimate:	$	801,776

FIELD COST ESTIMATE

Vendor	Service/Equipment	Daily Units	Unit Cost	Daily Cost	Units	Total Item Cost
Driltek	Project Manager	12.00	$ 362.23	$ 4,347	Hour	$ 65,997.25
Driltek	Contract Manager	0.00	$ 367.75	$ -	Hour	$ 4,347.00
Driltek	Well Engineering Specialist	12.00	$ 314.00	$ 3,768	Hour	$ 35,797.00
Driltek	Quality Control Site Manager	0.00	$ 314.00	$ -	Hour	$ 6,272.00
Driltek	Project Controls Director	0.00	$ 237.00	$ -	Hour	$ 1,896.00
Driltek	Environmental Manager	0.00	$ 268.75	$ -	Hour	$ 3,225.00
Driltek	HSE Rules Watch Specialist	0.00	$ 237.00	$ -	Hour	$ 632.00
Driltek	Operations Coordinator	12.00	$ 268.75	$ 3,225	Hour	$ 25,797.50
Driltek	HSE Manager	12.00	$ 268.75	$ 3,225	Hour	$ 34,296.25
Driltek	Pickup	792.00	$ 1.75	$ 891	Mile	$ 1,661.00
Driltek	Lodging	0.00	$ 181.00	$ -	Night	$ 3,438.00
Driltek	Per diem	0.00	$ 68.00	$ 130	Day	$ 2,511.00
Driltek Operating	Derrick Hand (Nights)	12.00	$ 1,288.00	$ 14,340	Hour	$ 167,293.00
Driltek Operating	Derrick Hand (Nights) additional	0.00	$ 244.75	$ -	Hour	$ 23,519.00
Driltek Operating	Rig servicing pump	1.00	$ 1,423.13	$ 1,423	Day	$ 17,077.50
Driltek Operating	Work string	0.00	$ 0.62	$ -	Ft/Day	$ 2,869.22
Driltek Operating	Pipe trailer	0.00	$ 112.00	$ -	Day	$ 1,747.75
Driltek Operating	Cement mix/mush pumping charge (4 hrs)	1.00	$ 2,402.50	$ 2,403	Job	$ 24,153.50
Driltek Operating	Cement supervisor	1.00	$ 1,423.13	$ 1,423	Day	$ 17,077.50
Driltek Operating	Cement blending	88.84	$ 2.22	$ 134	CuFt	$ 2,338.00
Driltek Operating	Crew transport	28.00	$ 204.63	$ 4,288	Hour	$ 53,277.38
Driltek Operating	Equipment transport	0.00	$ 204.63	$ -	Hour	$ 30,693.44
Driltek Operating	Lodging and per diem	0.00	$ 227.19	$ 1,364	Day/man	$ 19,408.29
Driltek Operating	Cement testing	0.00	$ 204.63	$ -	Hour	$ 890.19
Driltek Operating	Pull contact class G	88.84	$ 21.76	$ 1,778	CuFt	$ 9,997.77
Driltek Operating	Additives - Defoamer	8.10	$ 13.28	$ 134	Lb	$ 832.50
Driltek Operating	Additives - Dispersant	45.14	$ 1.97	$ 361	Lb	$ 2,871.00
Driltek Operating	Additives - Latex	24.10	$ 33.31	$ 720	Gal	$ 4,434.00
Driltek Operating	WOW Crew	0.00	$ 1,288.25	$ -	Day	$ 12,284.00
Driltek Operating	After Hours Travels	72.00	$ 138.69	$ 9,997	Hour	$ 18,224.73
Driltek Operating	Welder	0.00	$ 204.63	$ -	Hour	$ 8,338.79
Driltek Operating	Board Operator	0.00	$ 311.00	$ 311	Day	$ 4,731.12
Driltek Operating	3/4 mud lift	0.00	$ 284.10	$ 284	Day	$ 4,264.76
Driltek Operating	Mud station	0.00	$ 97.07	$ 97	Day	$ 741.03
Driltek Operating	10 barrel mixer	0.00	$ 398.48	$ -	Day	$ 796.96
Driltek Operating	Backhoe	0.00	$ 922.23	$ 922	Day	$ 9,221.00
Driltek Operating	Closing unit and recovery	0.00	$ 17,277.50	$ -	Well	$ 17,277.50
Driltek Operating	Power vehicle	0.00	$ 1,288.25	$ -	Day	$ 1,288.25
Driltek Operating	Crew vehicles	0.00	$ 344.19	$ -	Hour	$ 1,721.00

Hire Contract Cost

Vendor	Service/Equipment	Daily Units	Unit Cost	Daily Cost	Units	Total Item Cost Well Cost
	Concrete Recycling	0.00	$ 1	$ -	Day	$ 1,000.00
NAA	Toilet	0.00	$ -	$ -	Day	$ 174.00
Clemens	Water	0.00	$ 22	$ 297	Day	$ 822.00
CFOX	Dumpster	0.00	$ 75	$ 975	Day	$ 1,875.00
EEI	Gas Monitoring	0.00	$ 69	$ 897	Day	$ 2,481.00
CFOX	Portable Toilet		$ 275	$ -	Mo	$ 1,650.00
Kast Towing	Towing Rig	1.00	$ 4,000	$ 4,000	Each	$ 12,000.00
Haake	2.5" DCDT	0.00	$ 18,000	$ -	Each	$ 18,967.00
Driltek Operating	Additives - Suspension Agent	88.84	$ 1.62	$ 143	Lb	$ 1,332.00
Driltek Operating	Additives - Strengthening	8.10	$ 3.50	$ 28	Lb	$ 262.50
Driltek Operating	Additives - Fluid Loss	18.10	$ 7.00	$ 127	Lb	$ 1,900.70

On-Site Professional Service Personnel

Personnel Name	Role	Personnel Name	Role
Jeremy Fajardo	Driller		
Michael Ramos	Assistant Coordinator		

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DRILTEK

Daily Abandonment Report

Company:	CalGEM	Date:	12/23/2025
Lease:	Patel	Well:	2
Rig #:	3	Day:	17

Summary of Daily Activities: RIH and tag TOC at 487'. CalGEM rep, Stephen Offerrall witness TOC tag. Pump 58.8 CuFt (48.2 sxs of 15.6 ppg Class G cement w/ 0.5 gps Latex and 1/2 sx Cellotite from 487' to 397'. L/D workstring. Rig down and demob rig. Clean and secure location. Shut down for Holiday.

Forecast: Move in CTU, RIH and tag TOC. Pump 100' cement plug and WOC. Secure location. SDFN.

Start	End	Hours	Detail
6:00	7:00	1	SIA and FIRH with Drillers and DTOP. Review rig and equipment. Open well. 0 psi SICP and SITP. No gas observed.
7:00	7:45	0.75	RIH and tag TOC at 487'. CalGEM rep, Stephen Offerrall witness TOC tag.
7:45	8:15	1.5	Pump 58.8 CuFt (48.2 sxs of 15.6 ppg Class G cement w/ 0.5 gps Latex and 1/2 sx Cellotite from 487' to 397'. No returns during cement job. NO fluid breach at surface. Displace cement with potable pfw water.
8:15	10:15	2	L/D workstring.
10:15	17:00	6.75	Demob rig. Set wood plates over well. Berm and set plastic around well. Secure well and clean location. Shut down for Holiday.
			No gas readings detected throughout day with 4 gas monitor, security detail given monitor to conduct readings every hour.

Daily Hours:	11.33	Daily Cost:	$ 43,701	10% Contingency	$ 4,370	Total:	$ 48,170
Total Hours:	170.75				Total Well Field Estimate:		$ 734,881

FIELD COST ESTIMATE

Vendor	Service/Equipment	Daily Units	Unit Cost	Daily Cost	Units	Total Rate Cost
Driltek	Project Manager	11.33	$ 342.29	$ 3,878	Hour	$ 61,326.29
Driltek	Contract Manager	0.00	$ 342.29	$ -	Hour	$ 4,347.29
Driltek	Well Engineering Specialist	11.33	$ 313.54	$ 3,553	Hour	$ 51,951.36
Driltek	Double Controller Personnel	0.00	$ 313.54	$ -	Hour	$ 3,271.54
Driltek	Rotary Floor Extender	0.00	$ 227.08	$ -	Hour	$ 1,000.00
Driltek	Mooring and Rig Manager	0.00	$ 344.79	$ -	Hour	$ 3,453.79
Driltek	MD Public Works Specialist	0.00	$ 227.08	$ -	Hour	$ 625.00
Driltek	Operations Coordinator	11.33	$ 333.75	$ 2,046	Hour	$ 32,342.75
Driltek	HSE Manager	11.33	$ 333.75	$ 2,023	Hour	$ 32,013.75
Driltek	Mileage	100.00	$ 3.75	$ 340	Mile	$ 3,412.25
Driltek	Lodging	0.00	$ 191.25	$ -	Night	$ 1,912.50
Driltek	Per diem	7.00	$ 65.00	$ 476	Day	$ 2,175.00
Driltek Operating	Service rig - 8 hours/crew (Active)	11.33	$ 1,366.25	$ 15,600	Hour	$ 251,144.40
Driltek Operating	Extra hand (no basic requirement)	0.00	$ 344.79	$ -	Hour	$ 22,212.39
Driltek Operating	Rig/Operating pump	1.00	$ 1,403.13	$ 1,403	Day	$ 19,884.38
Driltek Operating	Work string	487.00	$ 0.63	$ 307	Foot	$ 7,969.10
Driltek Operating	Pipe trailer	1.00	$ 113.05	$ 234	Day	$ 1,757.75
Driltek Operating	Crew to mobilize pump rig (1/trip)	1.00	$ 1,413.50	$ 1,641	Job	$ 20,700.50
Driltek Operating	Cement supervisor	1.00	$ 1,403.13	$ 1,403	Day	$ 21,953.38
Driltek Operating	Cement blending	30.00	$ 3.28	$ 114	CuFt	$ 963.96
Driltek Operating	Cmt transport	0.00	$ 1,600.00	$ 2,277	Hour	$ 37,437.50
Driltek Operating	Equipment weight	0.00	$ 239.63	$ -	Hour	$ 25,053.24
Driltek Operating	Ladging/ crew dom	0.00	$ 227.75	$ -	Payment	$ 15,000.00
Driltek Operating	Cement testing	0.00	$ 344.63	$ -	Hour	$ 900.00
Driltek Operating	Bulk cement (circ)	30.00	$ 11.79	$ 1,279	CuFt	$ 6,621.75
Driltek Operating	Additives - Defoamer	0.00	$ 11.29	$ 104	lb	$ 715.39
Driltek Operating	Additives - Dispersant	65.00	$ 7.97	$ 363	lb	$ 3,311.89
Driltek Operating	Additives - Latex	24.00	$ 11.29	$ 786	Gal	$ 5,272.39
Driltek Operating	BOPE Crew	0.00	$ 1,366.25	$ -	Hour	$ 21,859.38
Driltek Operating	Mini-Rack Specialty	11.33	$ 113.54	$ 1,429	Hour	$ 21,517.67
Driltek Operating	Welder	0.00	$ 239.63	$ -	Hour	$ 3,355.75
Driltek Operating	Tower Crane	1.00	$ 313.54	$ 345	Day	$ 4,389.38
Driltek Operating	Silt sack kit	1.00	$ 344.63	$ 379	Day	$ 4,858.63
Driltek Operating	Steel plate	1.00	$ 34.38	$ 37	Day	$ 481.13
Driltek Operating	Oil dri or Loam	0.00	$ 108.25	$ -	Day	$ 796.25
Driltek Operating	Backhoe	1.00	$ 113.05	$ 113	Day	$ 1,582.50
Driltek Operating	Casing protectors/ears	0.00	$ 11,377.50	$ -	Well	$ 11,377.50
Driltek Operating	Power swivel	0.00	$ 1,366.25	$ -	Day	$ 1,366.25
Driltek Operating	Laser operator	0.00	$ 344.79	$ -	Hour	$ 1,213.89

Non Contract Cost

Vendor	Service/Equipment	Daily Units	Unit Cost	Daily Cost	Units	Total Rate Cost Well Cost
	Construction Water Tank	0.00	$ -	$ -	Day	$ 1,000.00
SAA	Tanker	0.00	$ -	$ -	Day	$ 1,275.00
Overland	Vehicle	1.00	$ 20	$ 20	Day	$ 320.00
Driltek	Dumpster	1.00	$ 75	$ 75	Day	$ 900.00
SAA	Fuel Monitoring	1.00	$ 200	$ 200	Day	$ 2,500.00
Driltek	7ft Service Truck		$ 275	$ -	Hr	$ 3,300.00
Rain Planning	Planning Rig	0.00	$ 4,000	$ -	Each	$ 5,000.00
Kaptan	20" BOP	0.00	$ 12,000	$ -	Each	$ 48,000.00
Driltek Operating	Additives - Suppression Agent	50.00	$ 1.00	$ 600	lb	$ 1,437.50
Driltek Operating	Additives - Strengthening	0.00	$ 2.00	$ 23	lb	$ 170.00
Driltek Operating	Additives - Fluid Loss	12.00	$ 7.00	$ 127	lb	$ 952.00

On-Site Professional Service Personnel

Personnel Name	Role	Personnel Name	Role
Jeremy Pizzolato	Driller		
Michael Ferrara	Operations Coordinator		

N — Los Angeles Fire Department CUPA correspondences: Oldaker to Belknap (December 2, 2025) and Flynn reply confirming dismissal in CERS (December 3, 2025) and October 22 and 24, November 18.

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12520 Magnolia Blvd.,
Valley Village, CA 91607
(213) 353-9416

FW: FW: LAFD HMBP Investigation Report for 314 Firmin St

Don Oldaker <DOldaker@clifford-brownlaw.com>

Wed 12/3/2025 1:29 PM

To: David Nathan <david@nathangroup.net>;

See below FYI

Donald C. Oldaker
CLIFFORD & BROWN
1430 Truxtun Avenue, Suite 900
Bakersfield, CA 93301
Tel. (661) 322-6023 / Fax (661) 322-3508
Email doldaker@clifford-brownlaw.com

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From: David Flynn <david.flynn@lacity.org>
Sent: Wednesday, December 3, 2025 1:07 PM
To: Don Oldaker <DOldaker@clifford-brownlaw.com>; Lafd CUPAEnforcement <lafd.cupaenforcement@lacity.org>
Subject: Re: FW: LAFD HMBP Investigation Report for 314 Firmin St

Good afternoon sir
My name is David Flynn. I am an Inspector II with CUPA for the Los Angeles City Fire Department. Regarding your concern over the "threatened or reportable" release, we have had significant discussions amongst our peers and experts as well as research into the matter. Following our review, we determined that the available documentation and observations do not provide sufficient support of a violation. As a result, enforcement will not move forward at this time. The violation has been dismissed in CERS as of 12/02/2025.
Please feel free to reach out for any questions.
Sincerely,

David G. Flynn
Inspector II/FFPM
CUPA Section
Los Angeles CITY Fire Department
200 N. Main Street #1780
Los Angeles, Ca. 90012
213-469-1218 CELL

On Wed, Dec 3, 2025 at 10:47 AM Barry Belknap <barry.belknap@lacity.org> wrote:

---------- Forwarded message ---------
From: **Don Oldaker** <DOldaker@clifford-brownlaw.com>
Date: Tue, Dec 2, 2025 at 3:17 PM
Subject: FW: LAFD HMBP Investigation Report for 314 Firmin St
To: barry.belknap@lacity.org <barry.belknap@lacity.org>
Cc: RoseMary Myers <RMyers@clifford-brownlaw.com>

Dear Mr. Belknap,

As you may be aware, there is a pending lawsuit entitled The People of the State of California v. Temple Resources, LLC, et al. Los Angeles County Superior Court Case No. 25STCV18004, which was filed by the Los Angeles City attorney on behalf of the California Geologic Energy Management Division of the Department of Conservation.

Our office has been retained by Temple Resources to handle the pending litigation, and we have been asked to respond to your e-mail below

As a preliminary matter, we have reviewed an e-mailed "Spill/Release Notification Guidance" dated January 17, 2024 and based upon our understanding of the relevant events, we do not believe the occurrence related to us satisfies the definition of either a :threatened" or a "significant" release as described in the guidance. Given that there is pending litigation, however, it would be preferable for discussions concerning this related matter to occur between counsel.

We are prepared to discuss your request with the City attorney at their convenience.

Thank you for your attention to the foregoing.

Donald C. Oldaker
CLIFFORD & BROWN
1430 Truxtun Avenue, Suite 900
Bakersfield, CA 93301
Tel. (661) 322-6023 / Fax (661) 322-3508
Email doldaker@clifford-brownlaw.com

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From: David Nathan <david@nathangroup.net>
Sent: Tuesday, December 2, 2025 12:44 PM

To: Don Oldaker <DOldaker@clifford-brownlaw.com>
Subject: Fw: LAFD HMBP Investigation Report for 314 Firmin St

Hi Don,

Lets discuss my response to this gentlemen. See attached and below.

DRE02251344

NOTICE: This e-mail may contain confidential and privileged material for the sole use of the intended recipient. Any review or distribution by others is strictly prohibited. If you are not the intended recipient, please contact the sender and delete this e-mail.

From: Barry Belknap <barry.belknap@lacity.org>
Sent: Tuesday, December 2, 2025 10:18 AM
To: Templeresources
Subject: Re: LAFD HMBP Investigation Report for 314 Firmin St

Good morning Mr. Nathan,
I am still looking for an update regarding the retroactive notification of release. Please let me know if you have any information. Did you make the report?

On Tue, Nov 18, 2025 at 1:25 PM Barry Belknap <barry.belknap@lacity.org> wrote:

> Good afternoon Mr. Nathan,
> Could you provide me an update on whether you were able to retroactively make the proper notifications of release. If so, could you provide the date you called and the confirmation number issued when you submitted the report? Thank you
>
> On Fri, Oct 24, 2025 at 3:43 PM Templeresources <Templeresources@nathangroup.net> wrote:
>
> > Hi Barry,
> >
> > When will you be free to discuss?

MONTES & ASSOCIATES
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12520 Magnolia Blvd.,
Valley Village, CA 91607
(213) 353-9416

--
Barry Belknap, Fire Inspector I
Environmental Unit UST/HM
Los Angeles Fire Department
cell: (213) 407-0340

--
Barry Belknap, Fire Inspector I
Environmental Unit UST/HM
Los Angeles Fire Department
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Los Angeles Fire Department
cell: (213) 407-0340

--
Barry Belknap, Fire Inspector I
Environmental Unit UST/HM
Los Angeles Fire Department
cell: (213) 407-0340

Thank you

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N-2 — Kevin Tomita trip plan for the December 8, 2025 site visit, signed December 8, 2025

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Clear Form

INSTRUCTIONS:

- Trip Plan items [1] through [11], include any details that may assist with search and rescue efforts in the event you are overdue when travelling.
- Site Visit Prep Worksheet, items [12] through [19], is a tool to assist you in preparing for duties away from the normal office setting. It is recommended for any initial site visit, and for each visit to a remote location or location with a known hazard.
- If the Board, Division, or Office is coordinating a trip that involves employees from other agencies, include the names of those persons in item [4].
- In item [6], include descriptions any vehicle, boat, or aircraft the travel team anticipates using.
- Attach extra sheets as needed.
- Place the original of this form in person with a supervisor or supervisor's designee prior to departure. Carry a copy of this form on the trip.
- If a travel team's itinerary changes significantly for any reason, the travel team shall contact the office and update the Trip Plan on file.
- If a team is overdue by 2 hours or more, the person holding the Trip Plan shall initiate efforts to contact the team. Efforts shall include (but are not limited to): calling the telephones of any persons listed in items [4] or [9]; if state vehicle was used, check to see if state vehicle has been returned; and calling home phone numbers of trip participants. If all efforts to contact the team are unsuccessful, contact local law enforcement and report the team overdue.
- Maintain the most recent version of this form in the case file for reference. Discard any previous versions.

Water Boards Code of Safe Practices — **Optional - Visit Prep Work Sheet** — Date: 12/8/25

Destination: 314 Firmin St, Los Angeles, CA — Completed By: Kevin Tomita

(To Assist Water Board Staff with Preparing for a Safe Site Visit)

Page 2 of 2

[12] Anticipated Site Work

- Routine Inspection ☒
- Complaint Based Inspection ☐
- Compliance Inspection ☐
- Required sampling equipment and supplies ☐

Other:

[13] Describe Site Location: (Check all that apply, attach other pertinent site info as needed)

- Remote Location ☐
- Urban ☒ (or) Rural ☐
- Apparent High Crime Area ☐
- Heavy equipment in use ☒
- Unfamiliar with the Site ☐
- Prior Water Board Visits ☒
- Onsite Potable Water; Wash Basin & Toilet Facility ☐

Other: Potential heavy equipment in use.

[14] Anticipated PPE:

- •Eye Protection ☒
- •Hard-Hat ☒
- •Hi-Vis Safety Vest ☒
- •Impervious or Work Gloves ☐
- •Steel Toe or Rubber Boots ☒
- •Nuisance Dust Mask ☐
- •N-95 respirator (wildfire smoke, voluntary use) ☐
- •Sun Screen, Insect Repellant, Tecnu ☒
- •Air Monitoring Equipment (if needed) ☐

Other:

Fire resistant clothing

(Note: Respiratory protection for airborne hazards has numerous regulatory requirements. Contact DAS Health and Safety if you believe respirators will be required at this site)

[15] Other Potential Safety Related Items:

- Decon Materials / Equipment ☐
- Shade Cover &, Drinking Water ☐
- Hot or Cold Weather Apparel ☐
- Snake-Bite Shin Guards ☐
- Hiking Stick, "PFD", Safety Throw Rope ☐
- First-Aid Kit ; Hand Sanitizer, Wipes ☐
- Fire Extinguisher or Long Handle Shovel ☐
- Nearest Emergency Medical to the Site ☐
- Long sleeve shirt, long pants ☐
- Do enter underground mines, abandoned structures, or compromised structures unless inspected and cleared by competent person ☐
- Do not enter excavations or trenches greater than 5 feet deep unless inspected and cleared by competent person ☐
- Intrinsically safe flashlight ☐

[16] Anticipated Adverse Site Weather/Adverse Road Conditions:

No adverse weather conditions.

[17] Required Training Completed (as needed):

- 4-Hour Field Safety ☐
- 24-Hour HAZWOPER ☐
- 40-Hour HAZWOPER ☒
- First Aid / Wilderness First Aid ☐
- CPR ☒
- Off-Road Driving ☐
- Site-specific training ☐

[18] Travel Vehicle:

- Appropriate Vehicle for the Driving Conditions ☒
- Obvious Maintenance Concerns ☒
- Engine Fluid Levels Appear OK ☒
- Excessive Tire Wear /Low Tire Pressure ☒
- Wheel chocks if parking on sloped terrain ☒
- Spare tire, jack, tire iron present ☒

[19] Discussion With: Your Supervisor ☐ Your Peer /Colleague ☒

- Discussion Outcome:

Water Board employees are reminded to stay out of active mining areas and away from operating heavy equipment unless accompanied by a safety escort

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Water Boards Code of Safe Practices

OPTIONAL TRIP PLAN to: 314 Firmin St, Los Angeles, CA (Destination) Date 12/8/25

LEAVE A COPY OF THIS FORM WITH YOUR SUPERVISOR OR THEIR DESIGNEE IN YOUR OFFICE.

Page 1 of 2

[1] SB/RB Unit:	[2] Supervisor: (Name/Title/Telephone #)	[3] Number of Staff On Trip:	[4] Employee(s) and Passengers: (Name/Title/Telephone #)
Unit 3	Kevin Tomita Acting Unit 3 Supervisor 323-770-3408	1	Team Lead: Kevin Tomita, Engineering Geologist, 323-700-3408

[5] Planned Route of Travel (or attach printed route map, if available):

https://maps.app.goo.gl/DMPRNNujc5g8Rdov5

See link above, from office to site and back

[6] Vehicle Description and License Plate:
Toyota Highlander
#1586365

[7] Estimated Time of Departure:
10:30am

[8] Estimated Time of Return:
12:00pm

[9] Site Name, Street Address & Contact(s): (Name/Title/Telephone #)
Neda Tafi
CalGEM
213-618-1957

- Site Safety Officer ☒
- Site First-Aid Trained Personnel ☒
- Cell Phone Coverage at Site Location ☒

[10] Name and Signature of Person Completing This Form:

Kevin Tomita (PRINT NAME)

Kevin Tomita (SIGNATURE) Digitally signed by Kevin Tomita Date: 2025.12.08 09:55:14 -08'00'

[11] Trip Plan on File With (Name, Signature, and Phone Number):

PRINT NAME PHONE NUMBER SIGNATURE

Note: The "team lead" must contact the person listed on item # 11 of this form upon return or should travel problems occur. The person listed on item# 11 of this form must make a reasonable effort to be available for contact and must contact the appropriate person(s), as required by the situation. See instructions on page 3.

For emergency assistance, please contact "911"

Version 5.0 7/06/2021

CONTINUED ON PAGE 2

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N-3 — Regional Board site photographs, November 24, 2025 (IMG_1485–1487)

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N-4 — Regional Board site photographs, December 8, 2025 (IMG_1520–1527)

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O-1 — HomeInfoMax Title History Report for AIN 5160-022-021, cited at footnote 6 of the Order

MONTES & ASSOCIATES
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12520 Magnolia Blvd.,
Valley Village, CA 91607
(213) 353-9416

Title History Report

PROPERTY

Address: **314 FIRMIN ST, LOS ANGELES, CA 90026**
Owner: **TEMPLE RESOURCES LLC**
County: **LOS ANGELES**
APN: **5160-022-021**

Show Property location

RECORD #1

SALE

Sale Recording Date: **Jun 8, 2022**
Sale Date: **Jun 1, 2022**
Sale Document #: **608361**
Document Type: **DEED TRANSFER**
Grantor: **NATHAN DAVID**
Grantee(s): **Temple Resources Llc**
Sale Price:
Sale Type:
Book/Page:
Vesting: **LIMITED LIABILITY COMPANY**
Title Company: **ACCOMMODATION/COURTESY RECORDING**
Sale Arm's Length:

RECORD #2

SALE

Sale Recording Date: **Apr 28, 2022**
Sale Date: **Apr 26, 2022**
Sale Document #: **461588**

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Document Type: **DEED TRANSFER**
Grantor: **VIDA RESOURCES LLC**
Grantee(s): **Nathan David**
Sale Price: **$1,500,000.00**
Sale Type: **FULL VALUE**
Book/Page:
Vesting: **SINGLE MAN**
Title Company: **PACIFIC COAST TITLE**
Sale Arm's Length: **Y**

FINANCE

Mortgage Recording Date: **Apr 28, 2022**
Mortgage Document #: **461589**
Document Type: **TRUST DEED/MORTGAGE**
Lender: **EVERETT FINANCIAL INC**
Title Company:
Borrower(s): **NATHAN DAVID**
Vesting: **SINGLE MAN**
Loan Amount: **$1,288,663.00**
Mortgage Term: **30 YEARS**
Mortgage Rate Type:
Mortgage Rate Percent: **4.1600**
Mortgage Type: **FEDERAL HOUSING ADMINISTRATION**
Description: **RESALE**

RECORD #3

SALE

Sale Recording Date: **Apr 4, 2018**
Sale Date: **Apr 3, 2018**
Sale Document #: **322441**
Document Type: **DEED TRANSFER**
Grantor: **NATHAN CHAIM**
Grantee(s): **Vida Resources Llc**
Sale Price:
Sale Type:
Book/Page:
Vesting:

MONTES & ASSOCIATES
Attorneys at Law
12520 Magnolia Blvd.,
Valley Village, CA 91607
(213) 353-9416

Title Company: **NONE AVAILABLE**
Sale Arm's Length:

RECORD #4

SALE

Sale Recording Date: **Apr 4, 2018**
Sale Date: **Apr 3, 2018**
Sale Document #: **322440**
Document Type: **DEED TRANSFER**
Grantor: **NATHAN LEAH**
Grantee(s): **Nathan Chaim**
Sale Price:
Sale Type:
Book/Page:
Vesting: **SOLE AND SEPARATE / MARRIED MAN**
Title Company: **NONE AVAILABLE**
Sale Arm's Length:

RECORD #5

SALE

Sale Recording Date: **Feb 14, 2011**
Sale Date: **Feb 7, 2011**
Sale Document #: **240586**
Document Type: **DEED TRANSFER**
Grantor: **CSE OWNED LLC**
Grantee(s): **Nathan Chaim**
Sale Price: **$268,500.00**
Sale Type: **FULL VALUE**
Book/Page:
Vesting: **MARRIED MAN**
Title Company: **ORANGE COAST TITLE**
Sale Arm's Length: **Y**

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Valley Village, CA 91607
(213) 353-9416

RECORD #6

SALE

Sale Recording Date: **Nov 24, 2010**
Sale Date: **Aug 30, 2010**
Sale Document #: **1712726**
Document Type: **DEED TRANSFER**
Grantor: **LAW OFFICES OF LES ZIEVE**
Grantee(s): **Cse Owned Llc**
Sale Price: **$363,824.00**
Sale Type: **CONFIRMED**
Book/Page:
Vesting: **COMPANY**
Title Company:
Sale Arm's Length:

RECORD #7

SALE

Sale Recording Date: **Sep 2, 2010**
Sale Date: **Aug 30, 2010**
Sale Document #: **1235500**
Document Type: **DEED TRANSFER**
Grantor: **LAW OFFICES OF LES ZIEVE**
Grantee(s): **Cse Owned Llc**
Sale Price: **$363,824.00**
Sale Type: **CONFIRMED**
Book/Page:
Vesting: **COMPANY**
Title Company: **ATTORNEY ONLY**
Sale Arm's Length:

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Attorneys at Law
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RECORD #8

SALE

Sale Recording Date: **Sep 19, 2005**
Sale Date: **Aug 26, 2005**
Sale Document #: **2248344**
Document Type: **DEED TRANSFER**
Grantor: **VELASCO CARLOS H**
Grantee(s): **Velasco Alicia / Velasco Carlos H**
Sale Price:
Sale Type:
Book/Page:
Vesting: **JOINT TENANT**
Title Company: **FIDELITY NATIONAL TITLE**
Sale Arm's Length:

FINANCE

Mortgage Recording Date: **Sep 19, 2005**
Mortgage Document #: **2248345**
Document Type: **TRUST DEED/MORTGAGE**
Lender: **QHL HOLDINGS FUND TEN LLC**
Title Company:
Borrower(s): **VELASCO ALICIA / VELASCO CARLOS H**
Vesting: **JOINT TENANT**
Loan Amount: **$290,000.00**
Mortgage Term:
Mortgage Rate Type: **VAR**
Mortgage Rate Percent: **576**
Mortgage Type: **CONVENTIONAL**
Description: **REFINANCE**

RECORD #9

SALE

Sale Recording Date: **Oct 10, 2000**
Sale Date: **Oct 3, 2000**

MONTES & ASSOCIATES
Attorneys at Law
12520 Magnolia Blvd.,
Valley Village, CA 91607
(213) 353-9416

Sale Document #: **1581037**
Document Type: **DEED TRANSFER**
Grantor: **PATEL BALUBHAI G & SARDABEN B**
Grantee(s): **Velasco Carlos H**
Sale Price: **$390,000.00**
Sale Type: **PARTIAL**
Book/Page:
Vesting:
Title Company: **PROVIDENT TITLE**
Sale Arm's Length:

FINANCE

Mortgage Recording Date: **Oct 10, 2000**
Mortgage Document #: **1581038**
Document Type: **TRUST DEED/MORTGAGE**
Lender: **SELLER**
Title Company:
Borrower(s): **VELASCO CARLOS H**
Vesting:
Loan Amount: **$387,500.00**
Mortgage Term:
Mortgage Rate Type: **FIX**
Mortgage Rate Percent: **801**
Mortgage Type: **CONVENTIONAL**
Description: **RESALE**

LOS ANGELES COUNTY, CA RECORDING RANGE FOR THIS REPORT

Records	Start Date	Through Date
Sales	Jan 1, 1988	Feb 10, 2026
Mortgages	Jan 4, 1988	Feb 10, 2026
Assignments	Jan 2, 1980	Feb 10, 2026
Releases	Jan 2, 1980	Feb 10, 2026
Foreclosures	Jan 2, 1980	Feb 10, 2026

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O-2 — Vida Resources, LLC Secretary of State filings: Articles of Organization (filed April 10, 2012) and Statements of Information (filed December 13, 2021 and April 30, 2022)

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BA20220143594

B0692-2827 04/30/2022 2:17 PM Received by California Secretary of State

STATE OF CALIFORNIA
Office of the Secretary of State
STATEMENT OF INFORMATION
LIMITED LIABILITY COMPANY
California Secretary of State
1500 11th Street
Sacramento, California 95814
(916) 653-3516

For Office Use Only
-FILED-
File No.: BA20220143594
Date Filed: 4/30/2022

Entity Details	
Limited Liability Company Name	VIDA RESOURCES, LLC
Entity No.	201211410471
Formed In	CALIFORNIA
Street Address of Principal Office of LLC	
Principal Address	859 NORTH VIRGIL AVE SUITE B LOS ANGELES, CA 90029
Mailing Address of LLC	
Mailing Address	859 NORTH VIRGIL AVE SUITE B LOS ANGELES, CA 90029
Attention	
Street Address of California Office of LLC	
Street Address of California Office	859 NORTH VIRGIL AVE SUITE B LOS ANGELES, CA 90029

Manager(s) or Member(s)

Manager or Member Name	Manager or Member Address
Chaim Nathan	859 North Virgil Ave Suite B Los Angeles, CA 90029

Agent for Service of Process	
Agent Name	CHAIM NATHAN
Agent Address	859 NORTH VIRGIL AVE SUITE B LOS ANGELES, CA 90029
Type of Business	
Type of Business	REAL ESTATE
Email Notifications	
Opt-in Email Notifications	No, I do NOT want to receive entity notifications via email. I prefer notifications by USPS mail.

Chief Executive Officer (CEO)

CEO Name	CEO Address
None Entered	

Labor Judgment

No Manager or Member of this Limited Liability Company has an outstanding final judgment issued by the Division of Labor Standards Enforcement or a court of law, for which no appeal therefrom is pending, for the violation of any wage order or provision of the Labor Code.

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Secretary of State
Statement of Information
(Limited Liability Company)

LLC-12

21-G47974

FILED

In the office of the Secretary of State
of the State of California

DEC 13, 2021

IMPORTANT — Read instructions **before completing this form.**

Filing Fee – $20.00

Copy Fees – First page $1.00; each attachment page $0.50;
Certification Fee - $5.00 plus copy fees

This Space For Office Use Only

1. Limited Liability Company Name (Enter the exact name of the LLC. If you registered in California using an alternate name, see instructions.)

VIDA RESOURCES, LLC

2. 12-Digit Secretary of State File Number	3. State, Foreign Country or Place of Organization (only if formed outside of California)
201211410471	CALIFORNIA

4. Business Addresses

	City (no abbreviations)	State	Zip Code
a. Street Address of Principal Office - Do not list a P.O. Box: 859 North Virgil Ave Suite B	Los Angeles	CA	90029
b. Mailing Address of LLC, **if different than item 4a**: 859 North Virgil Ave Suite B	Los Angeles	CA	90029
c. Street Address of **California** Office, if Item 4a is not in California - Do not list a P.O. Box: 859 North Virgil Ave Suite B	Los Angeles	CA	90029

5. Manager(s) or Member(s) If no **managers** have been appointed or elected, provide the name and address of each **member**. At least one name **and** address must be listed. If the manager/member is an individual, complete Items 5a and 5c (leave Item 5b blank). If the manager/member is an entity, complete Items 5b and 5c (leave Item 5a blank). Note: The LLC cannot serve as its own manager or member. If the LLC has additional managers/members, enter the name(s) and addresses on Form LLC-12A (see instructions).

First Name, if an individual - Do not complete Item 5b	Middle Name	Last Name	Suffix
a. Chaim		Nathan	
b. Entity Name - Do not complete Item 5a			
c. Address: 859 North Virgil Ave Suite B	City (no abbreviations): Los Angeles	State: CA	Zip Code: 90029

6. Service of Process (Must provide either Individual **OR** Corporation.)

INDIVIDUAL – Complete Items 6a and 6b only. Must include agent's full name and California street address.

California Agent's First Name (if agent is **not** a corporation)	Middle Name	Last Name	Suffix
a. Chaim		Nathan	
b. Street Address (if agent is **not** a corporation) - **Do not enter a P.O. Box**: 859 North Virgil Ave Suite B	City (no abbreviations): Los Angeles	State: CA	Zip Code: 90029

CORPORATION – Complete Item 6c only. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) – Do not complete Item 6a or 6b

7. Type of Business

a. Describe the type of business or services of the Limited Liability Company: Real Estate

8. Chief Executive Officer, if elected or appointed

First Name	Middle Name	Last Name	Suffix
a.			
b. Address	City (no abbreviations)	State	Zip Code

9. The Information contained herein, including any attachments, is true and correct.

Date	Type or Print Name of Person Completing the Form	Title	Signature
12/13/2021	Chaim Nathan	manager	

Return Address (Optional) (For communication from the Secretary of State related to this document, or if purchasing a copy of the filed document enter the name of a person or company and the mailing address. This information will become public when filed. SEE INSTRUCTIONS BEFORE COMPLETING.)

Name:
Company:
Address:
City/State/Zip:

MONTES & ASSOCIATES
Attorneys at Law
12520 Magnolia Blvd.,
Valley Village, CA 91607
(213) 353-9416

LLC-1 File # 201211410471

State of California
Secretary of State

Limited Liability Company
Articles of Organization

FILED
In the Office of the Secretary of State
of the State of California
APR 10 2012

A $70.00 filing fee must accompany this form.
Important – Read instructions before completing this form.

This Space For Filing Use Only

Entity Name (End the name with the words "Limited Liability Company," or the abbreviations "LLC" or "L.L.C." The words "Limited" and "Company" may be abbreviated to "Ltd." and "Co.," respectively.)

1. NAME OF LIMITED LIABILITY COMPANY
Vida Resources, LLC

Purpose (The following statement is required by statute and should not be altered.)

2. THE PURPOSE OF THE LIMITED LIABILITY COMPANY IS TO ENGAGE IN ANY LAWFUL ACT OR ACTIVITY FOR WHICH A LIMITED LIABILITY COMPANY MAY BE ORGANIZED UNDER THE BEVERLY-KILLEA LIMITED LIABILITY COMPANY ACT.

Initial Agent for Service of Process (If the agent is an individual, the agent must reside in California and both Items 3 and 4 must be completed. If the agent is a corporation, the agent must have on file with the California Secretary of State a certificate pursuant to California Corporations Code section 1505 and Item 3 must be completed (leave Item 4 blank).

3. NAME OF INITIAL AGENT FOR SERVICE OF PROCESS
Henry N. Jannol

4. IF AN INDIVIDUAL, ADDRESS OF INITIAL AGENT FOR SERVICE OF PROCESS IN CALIFORNIA | CITY | STATE | ZIP CODE
10850 Wilshire Blvd., Suite 825, Los Angeles | CA | 90024

Management (Check only one)

5. THE LIMITED LIABILITY COMPANY WILL BE MANAGED BY:

- ☐ ONE MANAGER
- ☐ MORE THAN ONE MANAGER
- ☑ ALL LIMITED LIABILITY COMPANY MEMBER(S)

Additional Information

6. ADDITIONAL INFORMATION SET FORTH ON THE ATTACHED PAGES, IF ANY, IS INCORPORATED HEREIN BY THIS REFERENCE AND MADE A PART OF THIS CERTIFICATE.

Execution

7. I DECLARE I AM THE PERSON WHO EXECUTED THIS INSTRUMENT, WHICH EXECUTION IS MY ACT AND DEED.

April 10, 2012
DATE

SIGNATURE OF ORGANIZER

Henry N. Jannol
TYPE OR PRINT NAME OF ORGANIZER

LLC-1 (REV 04/2010) APPROVED BY SECRETARY OF STATE

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R — City of Los Angeles ZIMAS report for AIN 5160-022-021

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City of Los Angeles
Department of City Planning

10/8/2026
PARCEL PROFILE REPORT

PROPERTY ADDRESSES
318 N FIRMIN ST
316 N FIRMIN ST
314 N FIRMIN ST

ZIP CODES
90026

RECENT ACTIVITY
None

CASE NUMBERS
CPC-2018-5222-SP
CPC-2008-4247-GPA
CPC-2007-2851-CPU
CPC-2007-1233-GPA
CPC-1987-182-SP
CPC-1986-605-GPC
ORD-186370
ORD-180983
ORD-179420
ORD-176519
ORD-169110
ORD-167944
ORD-166705
ORD-166704
ORD-166703
ORD-164625-SA470
ORD-156166
ORD-129279
ZAI-2729-O
ZA-1985-1343-NC
ENV-2018-5223-ND
ENV-2013-3392-CE
ENV-2008-4248-ND
ENV-2008-372-EIR
ND-81-259-ORD
AFF-253

Address/Legal Information	
PIN Number	135A209 257
Lot/Parcel Area (Calculated)	7,628.0 (sq ft)
Thomas Brothers Grid	PAGE 634 - GRID E2
Assessor Parcel No. (APN)	5160022021
Tract	PARK TRACT
Map Reference	M R 7-26/27
Block	26
Lot	FR 9
Arb (Lot Cut Reference)	None
Map Sheet	135A209
Jurisdictional Information	
Community Plan Area	Westlake
Area Planning Commission	Central APC
Neighborhood Council	ECHO PARK NC
Council District	CD 1 - Eunisses Hernandez
Census Tract #	2080.02000000
LADBS District Office	Los Angeles Metro
Permitting and Zoning Compliance Information	
Administrative Review	None
Planning and Zoning Information	
Special Notes	None
Zoning	CW
Zoning Information (ZI)	ZI-2537 Tree Canopy Equity Index Area
	ZI-2512 Housing Element Sites
	ZI-2427 Freeway Adjacent Advisory Notice for Sensitive Uses
	ZI-2452 Transit Priority Area in the City of Los Angeles
	ZI-2536 Environmental Protection Measures for Residential Projects with Five or More Units (Oil Wells)
	ZI-1195 Construction Site Review: Department of Conservation, Division of Oil, Gas, and Geothermal Resources
	ZI-2517 Al Fresco Ordinance within Planning Overlay and/or the Coastal Zone (Ordinance 188073)
	ZI-1441 Specific Plan: Central City West
General Plan Land Use	Medium Residential
General Plan Note(s)	Yes
Minimum Density Requirement	No
Hillside Area (Zoning Code)	No
Specific Plan Area	CENTRAL CITY WEST
Subarea	North (Temple/Beaudry Neighborhood District)
Special Land Use / Zoning	R4(CW)-75/3-O
Historic Preservation Review	No
HistoricPlacesLA	No
Historic Preservation Overlay Zone	None
Other Historic Designations	None
Mills Act Contract	None
CDO: Community Design Overlay	None
CPIO: Community Plan Imp. Overlay	None

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Subarea	None
CPIO Historic Preservation Review	No
CUGU: Clean Up-Green Up	None
HCR: Hillside Construction Regulation	No
NSO: Neighborhood Stabilization Overlay	No
POD: Pedestrian Oriented Districts	None
RBP: Restaurant Beverage Program Eligible Area	None
ASP: Alcohol Sales Program	No
RFA: Residential Floor Area District	None
RIO: River Implementation Overlay	No
SN: Sign District	No
AB 2334: Very Low Vehicle Travel Area	Yes
AB 2097: Within a half mile of a Major Transit Stop	Yes
Streetscape	No
Adaptive Reuse Subareas	No
Adaptive Reuse Program	Citywide Adaptive Reuse Program
Affordable Housing Linkage Fee	
Neighborhood	Echo Park
Residential Market Area	Medium / High
Commercial Market Area	High
Inclusionary Housing	No
Local Affordable Housing Incentive	No
Targeted Planting	No
Special Lot Line	No
Transit Oriented Communities (TOC)	Tier 2
Mixed Income Incentive Programs	
Transit Oriented Incentive Area (TOIA)	1
Opportunity Corridors Incentive Area	Not Eligible
Corridor Transition Incentive Area	Not Eligible
TCAC Opportunity Area	Low
High Quality Transit Corridor (within 1/2 mile)	Yes
ED 1 Eligibility	Not Eligible
RPA: Redevelopment Project Area	None
Central City Parking	No
Downtown Parking	No
Building Line	None
500 Ft School Zone	Active: Edward R. Roybal Learning Center
	Active: Edward R. Roybal Learning Center Innovative Cinematic and Music Production Magnet
	Active: Los Angeles Academy of Arts and Enterprise
	Active: Rise Kohyang Elementary
	Active: Rise Kohyang High
	Active: Los Angeles Academy of Arts & Enterprise
	Active: Ednovate: Brio College Prep
	Active: Rise Kohyang High School
500 Ft Park Zone	None
Zanja System 1 Mile Buffer	No
Assessor Information	
Assessor Parcel No. (APN)	5160022021
APN Area (Co. Public Works)*	0.235 (ac)
Use Code	0300 - Residential - Three Units (Any Combination) - 4 Stories or Less
Assessed Land Val.	$314,536
Assessed Improvement Val.	$0
Last Owner Change	06/08/2022

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Last Sale Amount	$1,500,000
Tax Rate Area	67
Deed Ref No. (City Clerk)	925013
	608361
	53431
	461588
	240586
	2248344
	1712726
	1581037
	157967-69
	1235500
	1197550
Building 1	
Year Built	1920
Building Class	D35B
Number of Units	1
Number of Bedrooms	1
Number of Bathrooms	1
Building Square Footage	580.0 (sq ft)
Building 2	
Year Built	1925
Building Class	D4
Number of Units	2
Number of Bedrooms	2
Number of Bathrooms	2
Building Square Footage	1,404.0 (sq ft)
Building 3	No data for building 3
Building 4	No data for building 4
Building 5	No data for building 5
Rent Stabilization Ordinance (RSO)	Yes [APN: 5160022021]
Additional Information	
Airport Hazard	None
Coastal Zone	None
Coastal Bluff Potential	No
Canyon Bluff Potential	No
Farmland	Area Not Mapped
Urban Agriculture Incentive Zone	YES
Very High Fire Hazard Severity Zone	No
Fire District No. 1	No
Flood Zone	Outside Flood Zone
Watercourse	No
Streams	No
Methane Hazard Site	Methane Zone
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	Yes
Wells	0403725755
	0403718961
Sea Level Rise Area	No
Oil Well Adjacency	Yes
Idle (200 ft)	Yes
Plugged (100 ft)	Yes
Any (100 ft)	Yes
Universal Planning Review Service Applicability	No

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Northeast D/O Ordinance Ridgelines	No
Environmental	
Santa Monica Mountains Zone	No
Biological Resource Potential	None
Mountain Lion Potential	None
Monarch Butterfly Potential	No
300-Foot Habitat Buffer	No
County-Designated SEAs and CRAs	No
USFWS-designated CHAs	No
Criterion 1 Protected Areas for Wildlife (PAWs)	No
Seismic Hazards	
Active Fault Near-Source Zone	
Nearest Fault (Distance in km)	0.9886188
Nearest Fault (Name)	Upper Elysian Park
Region	Los Angeles Blind Thrusts
Fault Type	B
Slip Rate (mm/year)	1.30000000
Slip Geometry	Reverse
Slip Type	Poorly Constrained
Down Dip Width (km)	13.00000000
Rupture Top	3.00000000
Rupture Bottom	13.00000000
Dip Angle (degrees)	50.00000000
Maximum Magnitude	6.40000000
Alquist-Priolo Fault Zone	No
Landslide	No
Liquefaction	No
Preliminary Fault Rupture Study Area	None
Tsunami Hazard Area	No
Economic Development Areas	
Business Improvement District	None
Hubzone	None
Jobs and Economic Development Incentive Zone (JEDI)	None
Opportunity Zone	No
Promise Zone	None
State Enterprise Zone	LOS ANGELES STATE ENTERPRISE ZONE
Housing	
Rent Stabilization Ordinance (RSO)	Yes [APN: 5160022021]
Ellis Act Property	No
Just Cause For Eviction Ordinance (JCO)	No
Housing Crisis Act and Resident Protections Ordinance Replacement Review	Yes
Housing Element Sites	
HE Replacement Required	Yes
SB 166 Units	Appendix 4.1 0.83
Housing Use within Prior 5 Years	Yes
Public Safety	
Police Information	
Bureau	Central
Division / Station	Rampart
Reporting District	238
Fire Information	
Bureau	Central
Battalion	1

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District / Fire Station	3
Red Flag Restricted Parking	No

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CASE SUMMARIES

Note: Information for case summaries is retrieved from the Planning Department's Plan Case Tracking System (PCTS) database.

Case Number:	CPC-2018-5222-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Description(s):	CENTRAL CITY WEST SPECIFIC PLAN AMENDMENT
Case Number:	CPC-2008-4247-GPA
Required Action(s):	GPA-GENERAL PLAN AMENDMENT
Project Description(s):	GENERAL PLAN AMENDMENT AND SPECIFIC PLAN AMENDMENT
Case Number:	CPC-2007-2851-CPU
Required Action(s):	CPU-COMMUNITY PLAN UPDATE
Project Description(s):	NEW WESTLAKE COMMUNITY PLAN.
Case Number:	CPC-2007-1233-GPA
Required Action(s):	GPA-GENERAL PLAN AMENDMENT
Project Description(s):	LUCAS AVENUE/5TH STREET RE-DESIGNATION AND DOWNGRADE
Case Number:	CPC-1987-182-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Description(s):	Data Not Available
Case Number:	CPC-1886-605-GPC
Required Action(s):	GPC-GENERAL PLAN/ZONING CONSISTENCY (AB283)
Project Description(s):	AB-283 PROGRAM - GENERAL PLAN/ZONE CONSISTENCY - WESTLAKE AREA- COMMUNITY WIDE ZONE CHANGES AND COMMUNITY PLAN CHANGES TO BRING THE ZONING INTO CONSISTENCY WITH THE COMMUNITY PLAN. INCLUDES CHANGES OF HEIGHT AS NEEDED. REQUIRED BY COURT AS PART OF SETTLEMENT IN THE HILLSIDE FEDERATION LAWSUIT (D. GREEN/BOWMAN)
Case Number:	ZAI-2729-O
Required Action(s):	O-METHODS AND CONDITIONS - OIL DRILLING CASES
Project Description(s):	Data Not Available
Case Number:	ZA-1985-1343-NC
Required Action(s):	NC-NONCONFORMING USE CASES
Project Description(s):	
Case Number:	ENV-2018-5223-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Description(s):	CENTRAL CITY WEST SPECIFIC PLAN AMENDMENT
Case Number:	ENV-2013-3392-CE
Required Action(s):	CE-CATEGORICAL EXEMPTION
Project Description(s):	THE PROPOSED ORDINANCE MODIFIES SECTION 22.119 OF THE LOS ANGELES ADMINISTRATIVE CODE TO ALLOW ORIGINAL ART MURALS ON LOTS DEVELOPED WITH ONLY ONE SINGLE-FAMILY RESIDENTIAL STRUCTURE AND THAT ARE LOCATED WITHIN COUNCIL DISTRICTS 1, 9, AND 14.
Case Number:	ENV-2008-4248-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Description(s):	GENERAL PLAN AMENDMENT AND SPECIFIC PLAN AMENDMENT
Case Number:	ENV-2008-372-EIR
Required Action(s):	EIR-ENVIRONMENTAL IMPACT REPORT
Project Description(s):	NEW WESTLAKE COMMUNITY PLAN.

DATA NOT AVAILABLE

ORD-186370
ORD-180983
ORD-179420
ORD-176519
ORD-169110
ORD-167944
ORD-166705
ORD-166704
ORD-166703
ORD-164625-SA470
ORD-156166

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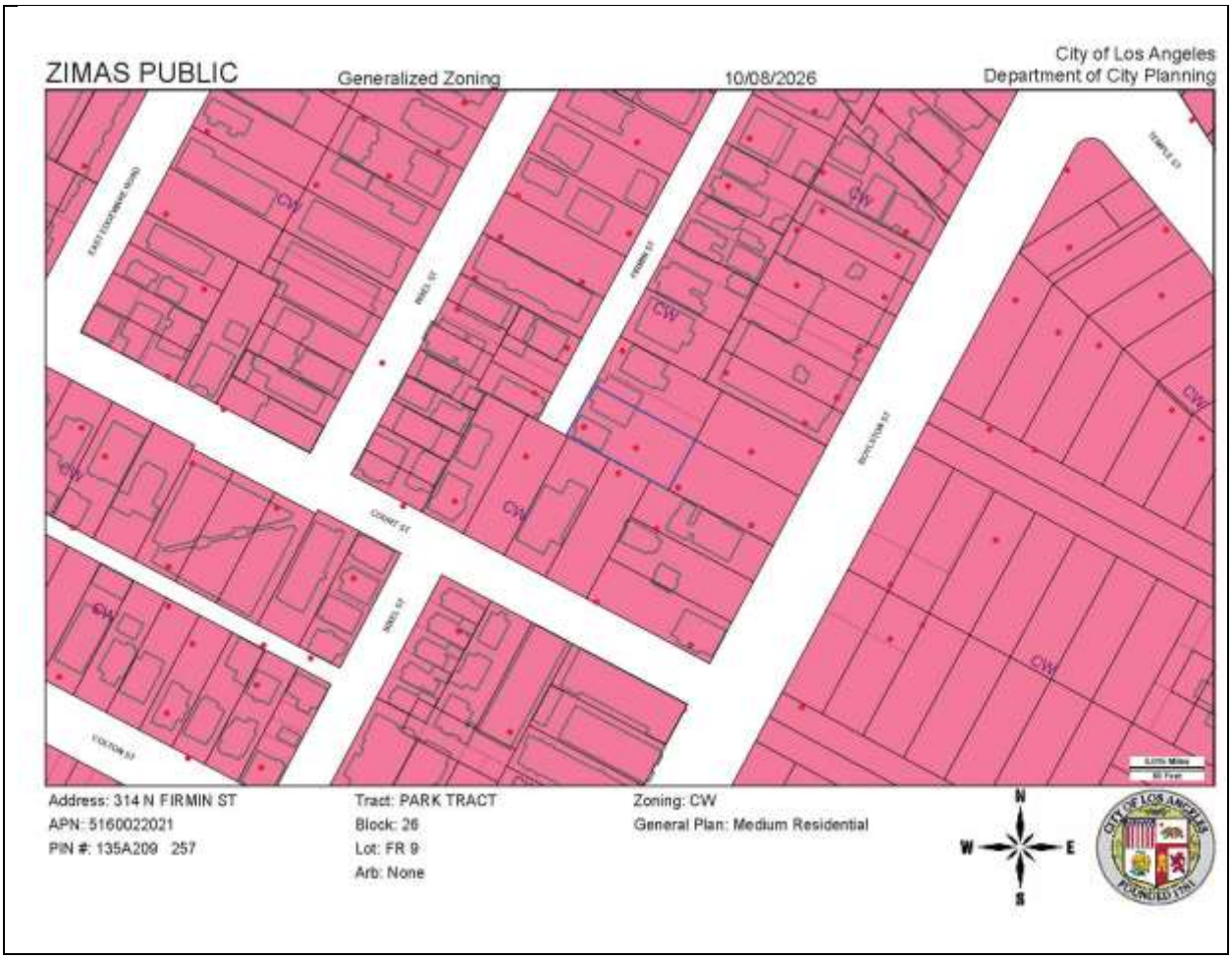
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ORD-129279
ND-81-259-ORD
AFF-253

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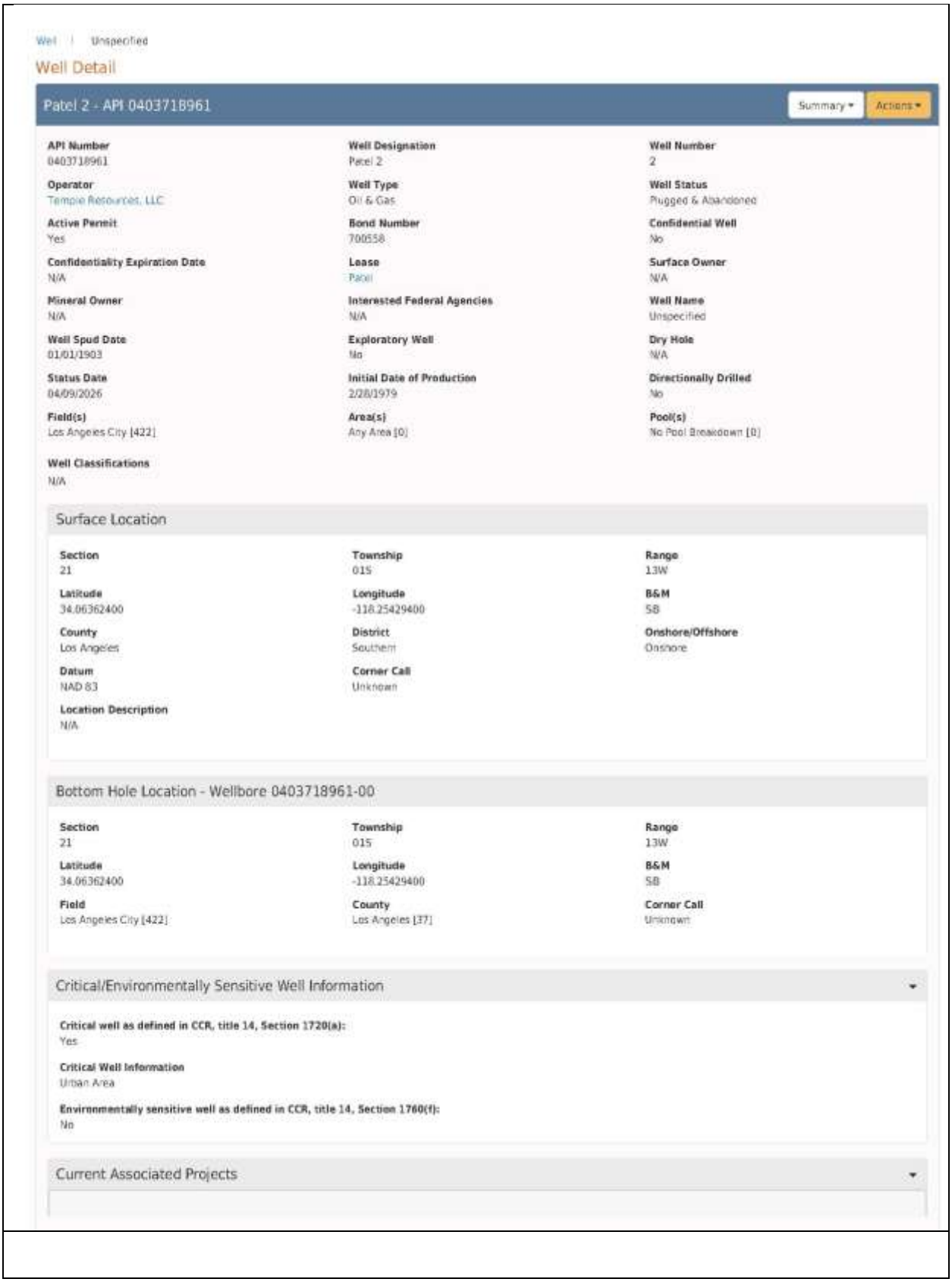
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ZIMAS PUBLIC
Generalized Zoning
10/08/2026
City of Los Angeles
Department of City Planning
CW
Address: 314 N FIRMIN ST
APN: 5160022021
PIN #: 135A209 257
Tract: PARK TRACT
Block: 26
Lot: FR 9
Arb: None
Zoning: CW
General Plan: Medium Residential
N
W
E
S

T — CalGEM WellSTAR well detail record, Patel 2 (API 0403718961)

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Well | Unspecified

Well Detail

Patel 2 - API 0403718961

Summary | Actions

API Number 0403718961	**Well Designation** Patel 2	**Well Number** 2
Operator Temple Resources, LLC	**Well Type** Oil & Gas	**Well Status** Plugged & Abandoned
Active Permit Yes	**Bond Number** 700558	**Confidential Well** No
Confidentiality Expiration Date N/A	**Lease** Patel	**Surface Owner** N/A
Mineral Owner N/A	**Interested Federal Agencies** N/A	**Well Name** Unspecified
Well Spud Date 01/01/1903	**Exploratory Well** No	**Dry Hole** N/A
Status Date 04/09/2026	**Initial Date of Production** 2/28/1979	**Directionally Drilled** No
Field(s) Los Angeles City [422]	**Area(s)** Any Area [0]	**Pool(s)** No Pool Breakdown [0]

Well Classifications
N/A

Surface Location

Section 21	**Township** 01S	**Range** 13W
Latitude 34.06362400	**Longitude** -118.25429400	**B&M** SB
County Los Angeles	**District** Southern	**Onshore/Offshore** Onshore
Datum NAD 83	**Corner Call** Unknown	

Location Description
N/A

Bottom Hole Location - Wellbore 0403718961-00

Section 21	**Township** 01S	**Range** 13W
Latitude 34.06362400	**Longitude** -118.25429400	**B&M** SB
Field Los Angeles City [422]	**County** Los Angeles [37]	**Corner Call** Unknown

Critical/Environmentally Sensitive Well Information

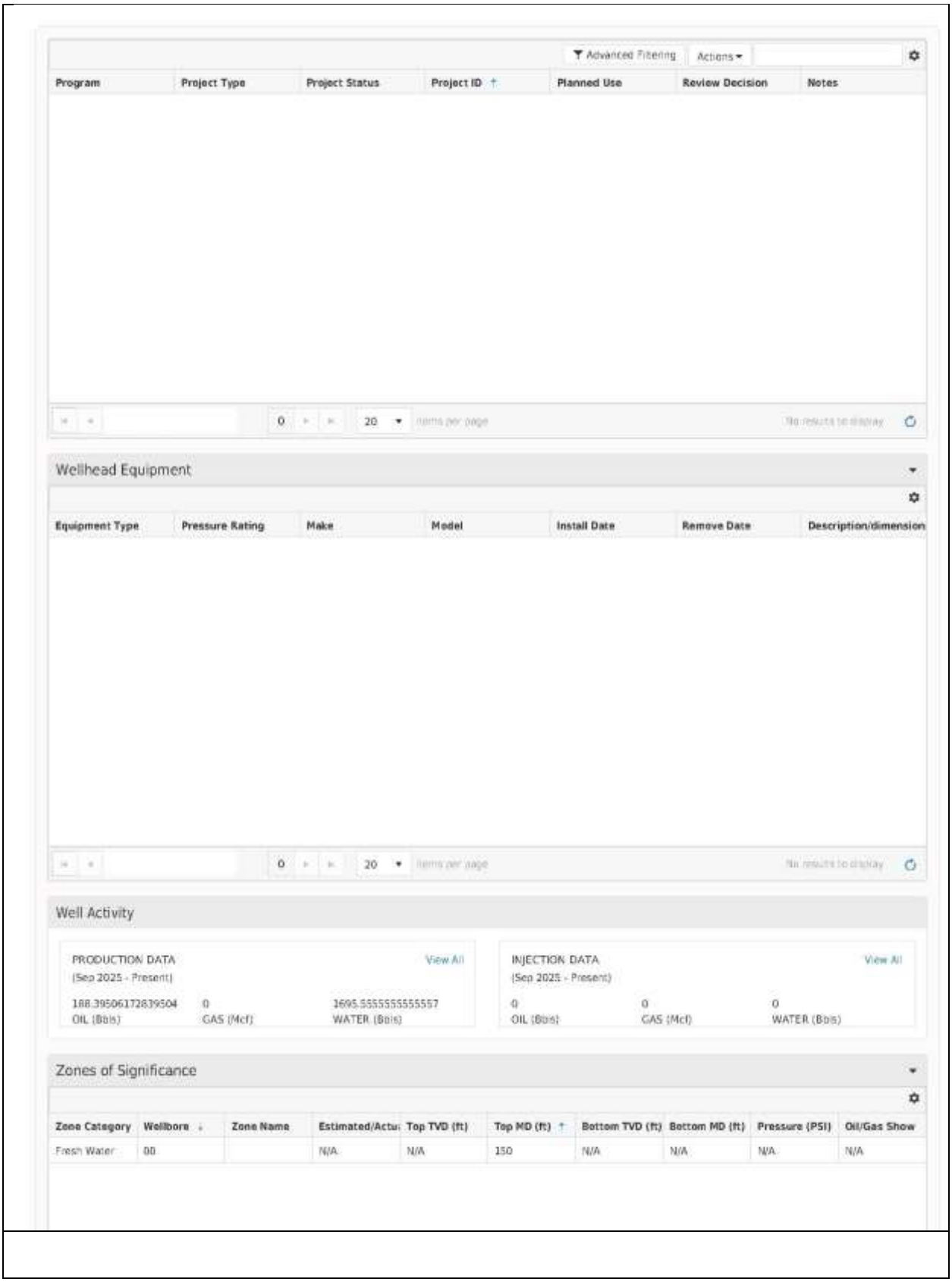
Critical well as defined in CCR, title 14, Section 1720(a):
Yes

Critical Well Information
Urban Area

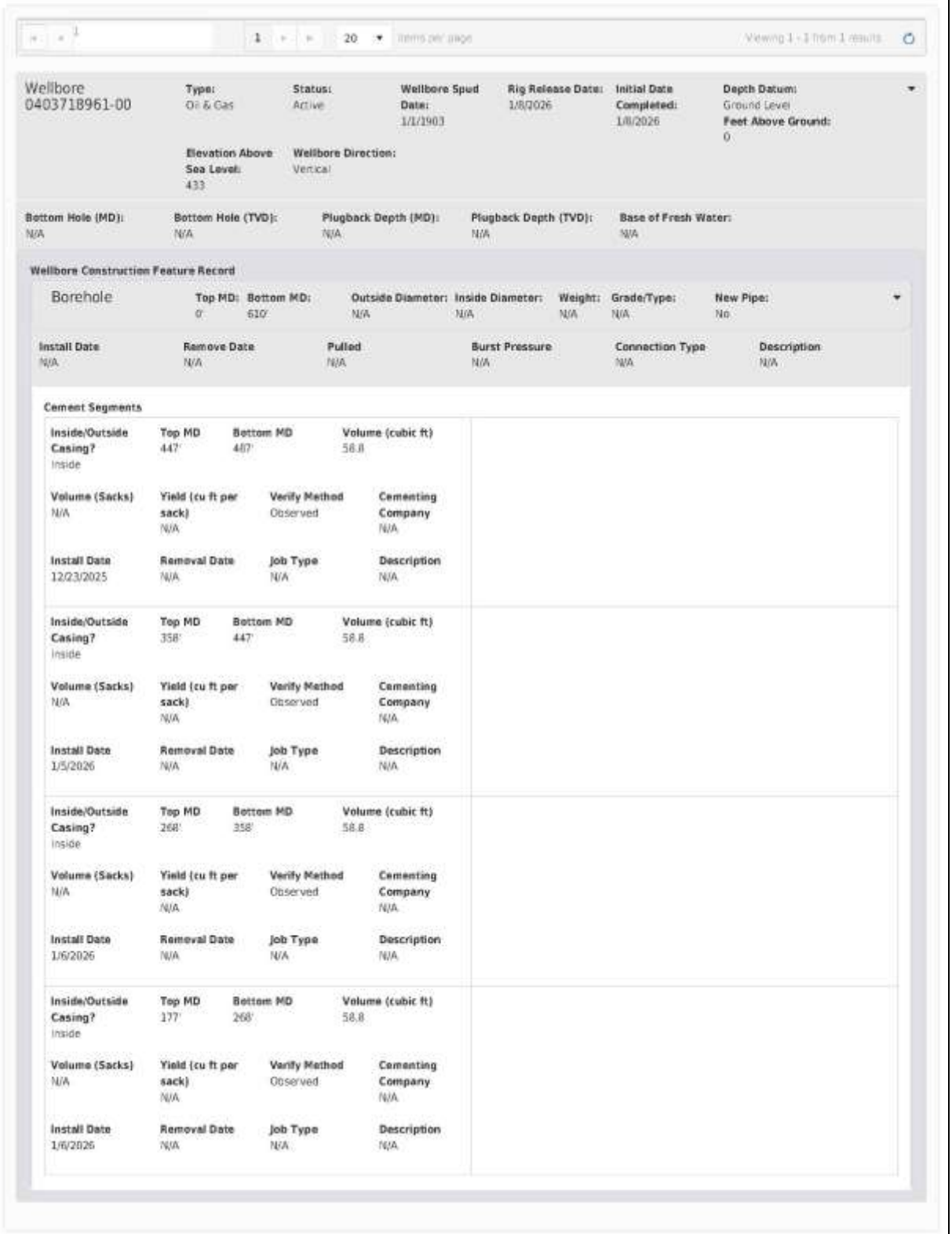
Environmentally sensitive well as defined in CCR, title 14, Section 1760(f):
No

Current Associated Projects

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Wellbore 0403718961-00

Type:	Status:	Wellbore Spud Date:	Rig Release Date:	Initial Date Completed:	Depth Datum:
Oil & Gas	Active	1/1/1903	1/8/2026	1/8/2026	Ground Level

Feet Above Ground: 0

Elevation Above Sea Level:	Wellbore Direction:
433	Vertical

Bottom Hole (MD):	Bottom Hole (TVD):	Plugback Depth (MD):	Plugback Depth (TVD):	Base of Fresh Water:
N/A	N/A	N/A	N/A	N/A

Wellbore Construction Feature Record

Borehole

Top MD:	Bottom MD:	Outside Diameter:	Inside Diameter:	Weight:	Grade/Type:	New Pipe:
0'	610'	N/A	N/A	N/A	N/A	No

Install Date	Remove Date	Pulled	Burst Pressure	Connection Type	Description
N/A	N/A	N/A	N/A	N/A	N/A

Cement Segments

Inside/Outside Casing?	Top MD	Bottom MD	Volume (cubic ft)
Inside	447'	467'	58.8

Volume (Sacks)	Yield (cu ft per sack)	Verify Method	Cementing Company
N/A	N/A	Observed	N/A

Install Date	Removal Date	Job Type	Description
12/23/2025	N/A	N/A	N/A

Inside/Outside Casing?	Top MD	Bottom MD	Volume (cubic ft)
Inside	358'	447'	58.8

Volume (Sacks)	Yield (cu ft per sack)	Verify Method	Cementing Company
N/A	N/A	Observed	N/A

Install Date	Removal Date	Job Type	Description
1/5/2026	N/A	N/A	N/A

Inside/Outside Casing?	Top MD	Bottom MD	Volume (cubic ft)
Inside	268'	358'	58.8

Volume (Sacks)	Yield (cu ft per sack)	Verify Method	Cementing Company
N/A	N/A	Observed	N/A

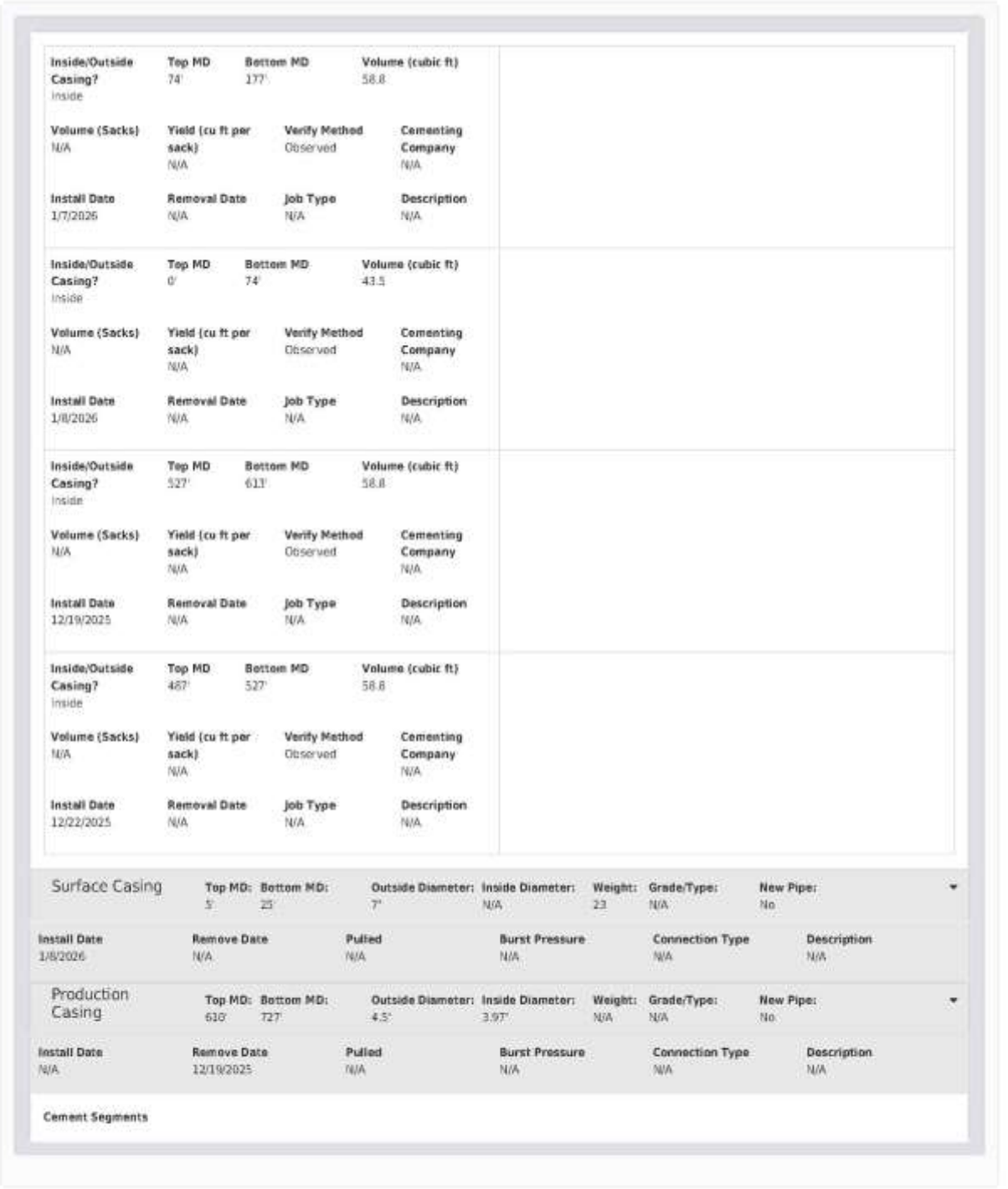
Install Date	Removal Date	Job Type	Description
1/6/2026	N/A	N/A	N/A

Inside/Outside Casing?	Top MD	Bottom MD	Volume (cubic ft)
Inside	177'	268'	58.8

Volume (Sacks)	Yield (cu ft per sack)	Verify Method	Cementing Company
N/A	N/A	Observed	N/A

Install Date	Removal Date	Job Type	Description
1/6/2026	N/A	N/A	N/A

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Inside/Outside Casing?	Top MD	Bottom MD	Volume (cubic ft)
Inside	74'	177'	58.8

Volume (Sacks)	Yield (cu ft per sack)	Verify Method	Cementing Company
N/A	N/A	Observed	N/A

Install Date	Removal Date	Job Type	Description
1/7/2026	N/A	N/A	N/A

Inside/Outside Casing?	Top MD	Bottom MD	Volume (cubic ft)
Inside	0'	74'	43.5

Volume (Sacks)	Yield (cu ft per sack)	Verify Method	Cementing Company
N/A	N/A	Observed	N/A

Install Date	Removal Date	Job Type	Description
1/8/2026	N/A	N/A	N/A

Inside/Outside Casing?	Top MD	Bottom MD	Volume (cubic ft)
Inside	527'	613'	58.8

Volume (Sacks)	Yield (cu ft per sack)	Verify Method	Cementing Company
N/A	N/A	Observed	N/A

Install Date	Removal Date	Job Type	Description
12/19/2025	N/A	N/A	N/A

Inside/Outside Casing?	Top MD	Bottom MD	Volume (cubic ft)
Inside	487'	527'	58.8

Volume (Sacks)	Yield (cu ft per sack)	Verify Method	Cementing Company
N/A	N/A	Observed	N/A

Install Date	Removal Date	Job Type	Description
12/22/2025	N/A	N/A	N/A

Surface Casing	Top MD:	Bottom MD:	Outside Diameter:	Inside Diameter:	Weight:	Grade/Type:	New Pipe:
	5'	25'	7"	N/A	23	N/A	No

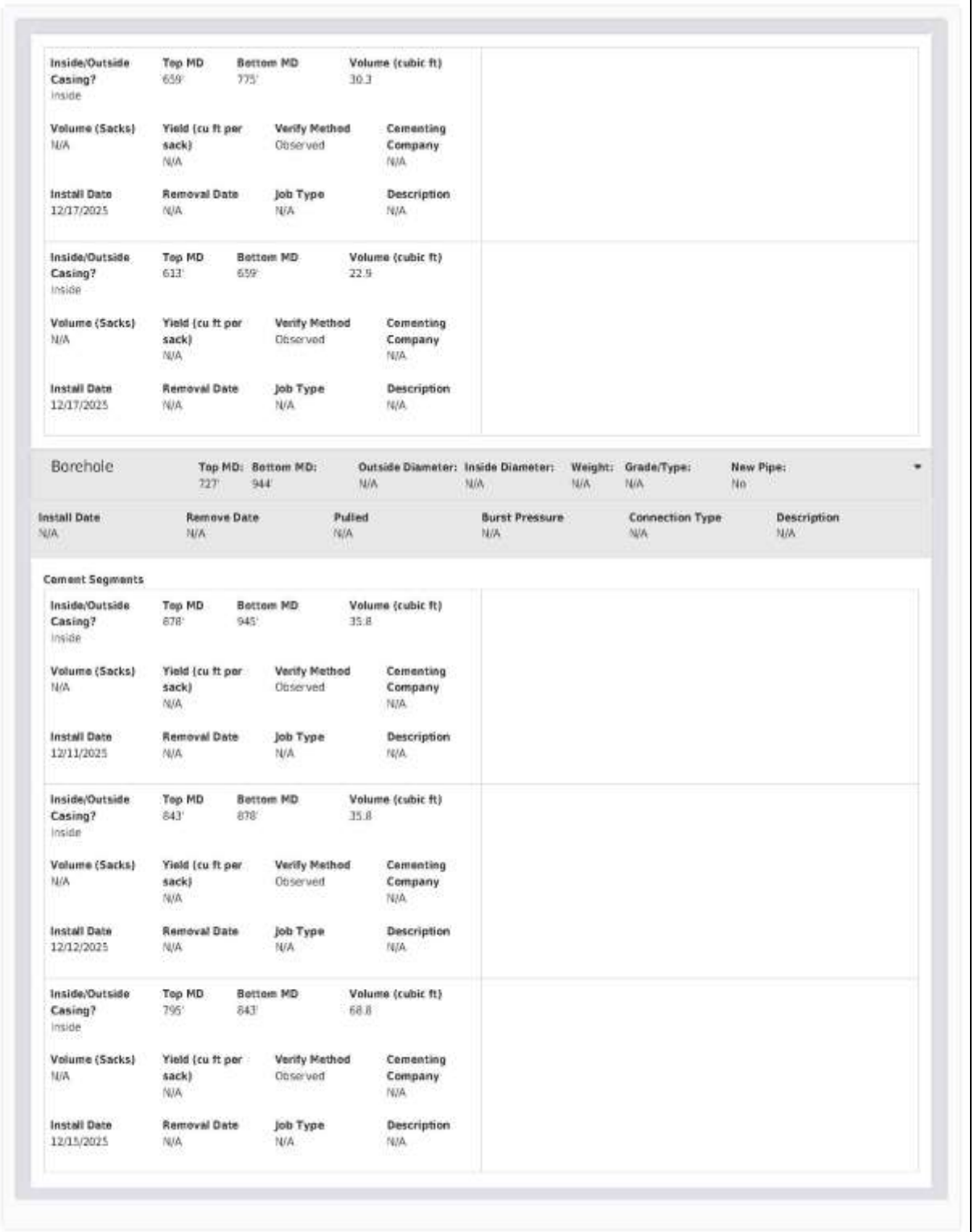
Install Date	Remove Date	Pulled	Burst Pressure	Connection Type	Description
1/8/2026	N/A	N/A	N/A	N/A	N/A

Production Casing	Top MD:	Bottom MD:	Outside Diameter:	Inside Diameter:	Weight:	Grade/Type:	New Pipe:
	610'	727'	4.5"	3.97"	N/A	N/A	No

Install Date	Remove Date	Pulled	Burst Pressure	Connection Type	Description
N/A	12/19/2025	N/A	N/A	N/A	N/A

Cement Segments

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Inside/Outside Casing?	Top MD	Bottom MD	Volume (cubic ft)
Inside	659'	775'	30.3

Volume (Sacks)	Yield (cu ft per sack)	Verify Method	Cementing Company
N/A	N/A	Observed	N/A

Install Date	Removal Date	Job Type	Description
12/17/2025	N/A	N/A	N/A

Inside/Outside Casing?	Top MD	Bottom MD	Volume (cubic ft)
Inside	613'	659'	22.9

Volume (Sacks)	Yield (cu ft per sack)	Verify Method	Cementing Company
N/A	N/A	Observed	N/A

Install Date	Removal Date	Job Type	Description
12/17/2025	N/A	N/A	N/A

Borehole

Top MD:	Bottom MD:	Outside Diameter:	Inside Diameter:	Weight:	Grade/Type:	New Pipe:
727'	944'	N/A	N/A	N/A	N/A	No

Install Date	Remove Date	Pulled	Burst Pressure	Connection Type	Description
N/A	N/A	N/A	N/A	N/A	N/A

Cement Segments

Inside/Outside Casing?	Top MD	Bottom MD	Volume (cubic ft)
Inside	878'	945'	35.8

Volume (Sacks)	Yield (cu ft per sack)	Verify Method	Cementing Company
N/A	N/A	Observed	N/A

Install Date	Removal Date	Job Type	Description
12/11/2025	N/A	N/A	N/A

Inside/Outside Casing?	Top MD	Bottom MD	Volume (cubic ft)
Inside	843'	878'	35.8

Volume (Sacks)	Yield (cu ft per sack)	Verify Method	Cementing Company
N/A	N/A	Observed	N/A

Install Date	Removal Date	Job Type	Description
12/12/2025	N/A	N/A	N/A

Inside/Outside Casing?	Top MD	Bottom MD	Volume (cubic ft)
Inside	795'	843'	68.8

Volume (Sacks)	Yield (cu ft per sack)	Verify Method	Cementing Company
N/A	N/A	Observed	N/A

Install Date	Removal Date	Job Type	Description
12/15/2025	N/A	N/A	N/A

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Inside/Outside Casing?	Top MD	Bottom MD	Volume (cubic ft)
Inside	775'	795'	39.2

Volume (Sacks)	Yield (cu ft per sack)	Verify Method	Cementing Company
N/A	N/A	Observed	N/A

Install Date	Removal Date	Job Type	Description
12/16/2025	N/A	N/A	N/A

Completions

Completion Interval	Type:	Interval Status:	Field:	Area:	Pool Code:
	Oil & Gas	Active	Los Angeles City	Any Area	No Pool Breakdown

Top MD:	Bottom MD:	Formation:	Max. Daily Injection Rate:	Max. Cumulative Volume:
N/A	N/A	N/A	N/A	N/A

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U — City of Los Angeles Office of Zoning Administration determination, Z.A.I. Case No. 2729-O, November 21, 1969

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CITY OF LOS ANGELES
CALIFORNIA

ARTHUR DVORIN
CHIEF ZONING ADMINISTRATOR

ASSOCIATE ZONING ADMINISTRATORS
JAMES MOSS
CHARLES V. CADWALLADER
MANUS D. O'GRADY
FABIAN ROMANO
R. A. RUDSER

Robert D. Wilson

SAM YORTY
MAYOR

OFFICE OF
ZONING ADMINISTRATION

DEPARTMENT OF
CITY PLANNING

600 CITY HALL
LOS ANGELES, CALIF. 90012
MADISON 4-5211

November 21, 1969

Mary Pietrzyk
324 Firmin Street
Los Angeles, California 90026

Re: Z.A.I. CASE NO. 2729-0
314-324 Firmin Street
Westlake District
D. M. No. 135-B-209

Fire Prevention Bureau

Department of Building and Safety

Greetings:

In the matter of the application of Mary Pietrzyk, owner and operator, for maintenance of two nonconforming oil wells and tank, and for determination of conditions and methods of operation to be followed in the continued production of oil and gas from said wells on an interior site in the R4-2 Zone, please be advised that based upon the Findings of Fact hereinafter set forth and by virtue of authority contained in Sections 12.23-C,4 and 13.01-K of the Municipal Code, the Associate Zoning Administrator hereby authorizes and permits the continued maintenance of two nonconforming oil wells together with existing accessory facilities including hydralic pumping units with enclosing fences, oil storage tank and pipelines on a site comprising Lots 8 and 9 in Block 26 of Park Tract located at 314-324 Firmin Street, Westlake District, with said equipment to be used in connection with the production of hydrocarbons from the involved wells, for a temporary period ending June 1, 1971, subject to the following terms and conditions:

1. That Conditions Nos. 8, 9, 21, 37, 40, 49 and 58 of Subsection F, Section 13.01 of the Municipal Code are included in and by referenced made a part of this approval and shall be complied with to the same extent as if herein restated in detail.

2. That the operator of the wells on the involved site shall post in the Office of Zoning Administration, a $2,000 corporate surety bond conditioned upon the faithful performance of all provisions of the Municipal

Code and any conditions prescribed by a Zoning Administrator hereunder, said bond to be approved by the City Attorney and executed by both the owner of the property and any lessee who is operating the wells. 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 him or by any other officer or department of the City, or other alteration, modification or waiver affecting any of the obligations of grantee made by any City authority, shall be deemed to exonerate either the grantee or the surety on any bond posted as herein required.

3. That the nonconforming wells herein authorized to be maintained, shall not be redrilled or deepened in violation of the specific provisions of Section 12.23-C,4 of the Municipal Code. Further, that any work done on any existing well which requires the use of the derrick shall be done by a temporary or portable derrick and said derrick shall be removed within five days after completion of such work.

4. That the electrically powered hydralic pumping units and enclosing fences, storage tank and oil loading area shown on the plan submitted with the application and marked Exhibit "A" and on the photographs attached thereto, shall be maintained in a first-class condition at all times with minimum annoyance and noise or odor nuisance to persons living in the vicinity and in strict accordance with the regulations under Section 13.01-K of the Municipal Code. It being understood that the present chain-link fence enclosures will satisfactorily screen the oil wells from the adjacent properties provided they are straightened and repaired, and that if the existing tank is not repairable it may be replaced by a tank of similar size and height. That all oil waste material and debris be removed from the sump area between the tank and fire wall and that a 4 in. layer of crushed rock or sand be placed in the area between the tank and fire wall so as to permit the absorption of any spilled oil. That oil smears be removed from the tank and fire wall and that all unused tanks and oil production equipment or facilities, miscellaneous junk, debris or other waste material shall be removed from the site. Further, that the enclosures, tank support and well sites shall be maintained in a manner to keep out unauthorized personnel, and reasonable precaution taken to prevent the pumping units, tank and other production facilities from being a source of hazard to persons who may be attracted to the site.

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5. That the wells and equipment shall not be repaired or serviced, nor oil loaded or hauled from the site during the night hours between 7:00 P.M. to 7:00 A.M.

6. That each well shall be clearly identified with the name of the well, the Los Angeles Fire Department Permit Number, and the name and telephone number of the operator, by sign attached to the enclosing fence.

7. That all weeds, debris or other waste material shall be removed from the site and the entire site and equipment thereon shall be maintained in a clean and orderly manner at all times.

8. That this approval for maintenance of oil wells and site shall be in full force and effect until June 1, 1971, and thereafter shall be null and void. That on or before June 1, 1971, all production facilities shall cease, equipment be removed from the site and the oil well properly plugged and abandoned to meet any requirements of the Fire Department.

The applicant's attention is called to the fact that this grant is not a permit or license and that any permits and licenses required by law must be obtained from the proper public agency. Furthermore, that if any condition of this grant is violated, or if the same be not complied with in every respect, then the applicant or his successors in interest may be prosecuted for violating these conditions the same as for any violation of the requirements contained in the Municipal Code. In the event the property is to be sold, leased, rented or occupied by any person or corporation other than yourself, it is incumbent that you advise them regarding the conditions of this grant. The Associate Zoning Administrator's determination in this matter will become effective after an elapsed period of ten (10) days from the date of this communication, unless an appeal therefrom is filed with the Board of Zoning Appeals.

FINDINGS OF FACT

After thorough consideration of the statements contained in the application, the report of the Planning Associate thereon, the photographs of the site and adjacent properties, the statements made at the public hearing before the Associate Zoning Administrator on October 14, 1969, the proceedings under City Plan Case No. 19759 involving maintenance of nonconforming oil wells throughout the City, and the proceedings under Z.A.I. Case Nos. 2620, 2621, 2635, 2637 and several subsequent cases authorizing continued maintenance

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of nonconforming oil wells under similar conditions in the Los Angeles Field, all of which are by reference made a part hereof, as well as personal inspection of the oil well and surrounding neighborhood, conferences with the applicant and various City officials directly involved with the maintenance of the oil well in question, I find as follows:

1. The involved oil wells were drilled approximately 70 years ago prior to any zoning regulations and probably before residential development in the area in question. The non-conforming status of the wells was established in 1934 by Affidavit No. 253 presently on file in the Department of Building and Safety. Nearly all of the adjacent lots are improved with older wood frame dwellings, generally inadequately maintained and for the most part designed for single-family occupancy. Many of the dwellings observe reduced front yard setbacks of approximately 5 ft. The entire area appears ready for redevelopment in keeping with its R4-2 Zoning. The involved property is developed with three one-story dwellings adjacent to the Firmin Street frontage, one oil well with 6 ft. chain-link fence enclosure setback 9 ft. from Firmin Street but behind the prevailing building setback on the frontage, and also one oil well and tank on the southerly rear of the property. All vehicular access into the site is from Firmin Street, which is a narrow dead-in local street. The applicant acquired the involved property over 30 years ago and presently lives on the site. The wells have recently been modernized by the installation of hydralic pumping units and wire fence enclosures. The pumping units appear to be in acceptable mechanical condition and operate with no increase in noise or odor nuisance to adjacent properties. Oil production has been temporarily suspended because of a leak in the storage tank.

   Although the owners of adjacent properties have not objected to the maintenance of the oil wells and tank and were not present at the public hearing, the wells are less than 50 ft. from property owned by others, which property could conceivably be redeveloped for multiple-family residential uses in keeping with the present zone classification. The prolonged maintenance of the oil wells in this location could discourage the proper redevelopment of these strategically located adjacent residential properties.

2. The City Planning Commission and Council in 1966, considered a five (5) year time extension for removal of nonconforming oil wells similar to that granted other

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nonconforming commercial and industrial uses in the residential zone, however, this was not approved, and instead, the Zoning Administrator was given authority to consider wells on individual application and permit extension of the removal date if it can be determined that the continued operation would be reasonably compatible with the surrounding area. The involved wells and tank should have been removed from the site before June 1, 1966, however, instead the operator proceeded to upgrade the facilities so that they are now being maintained substantially in the manner required under Section 13.01-K of the Municipal Code, except for general maintenance and clean-up of the site. The present operation, while not particularly objectionable to existing developments in the immediate area, would not be compatible with the more intensive type of development permitted in this R4-2 Zone and the maintenance of the wells could very well preclude the proper redevelopment of the adjoining lots. The granting of the request without a time limit requiring removal of the entire facility at the time the zoning regulations require removal of other nonconforming buildings in the vicinity and throughout the City, would not be in keeping with the intent and purpose of the Comprehensive Zoning Plan, which provides for the eventual elimination of nonconforming uses of land and buildings in the residential zone. However, the granting of the request under the conditions imposed and for the term period coinciding with the time for removal of other nonconforming uses, would be reasonably compatible with the existing developments in the neighborhood and would carry out the intent and purpose of the Comprehensive Zoning Ordinance and give the applicant the same right enjoyed by owners of other nonconforming commercial and industrial buildings in the same general locality.

Very truly yours,

R. A. RUDSER
Associate Zoning Administrator

RAR:ss

cc: Director of Planning
Councilman Lindsay
Petroleum Administrator
Inspector Fred Sevy, L.A.F.D.
Robert Winter
Oil Well Inspector
Dept. Building & Safety
Kenneth Manley
c/o Manley Oil Company

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SUMMARY OF PUBLIC HEARING

Z. A. I. CASE NO. 2729-0
MARY PIETRZYK
(Maintenance of Oil Well)

REQUEST: To permit the continued maintenance and operation of the existing oil wells and tank. The property involved consists of Lots 8 and 9, Block 26, Park Tract, M.R.7-26/27 located in the R4-2 Zone at 314-324 Firmin Street, Westlake District

Associate Zoning Administrator R. A. RUDSER conducted a public hearing on this application on Tuesday, October 14, 1969 at approximately 9:30 a.m. in Room 561-A LosAngeles City Hall.

APPEARANCES IN SUPPORT

Kenneth Manley
946 Adobe Street
Los Angeles

INTERESTED PARTY

Man Yiu Yee
224 North Bixel Street
Los Angeles

APPEARANCES IN OPPOSITION

None

DISPOSITION

The application will be granted, then, until June 1, 1971. Then at that time we will know more about what to expect when the Council acts on that, and also we will have a chance to review what effect this will have on the neighborhood after it has been cleaned up and operated the way it should be.

L. Goldberg
Hearing Reporter

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R E P O R T

Z.A.I. CASE NO. 2729-0
MARY PIETRZYK
(MAINTENANCE OF OIL WELL)

REQUEST: To permit the continued maintenance and operation of the existing oil wells and tank. The property involved consists of Lots 8 and 9, Block 26, Park Tract M.R.7-26/27 located in the R4-2 (Multiple-dwelling) Zone at 314-324 Firmin Street, Westlake District.

FINDINGS:

The subject property consists of two terraced interior rectangular-lots having a uniform depth of 125 ft. and a combined frontage of approximately 121 ft. on the southeasterly side of Firmin Street.

The property is zoned R4-2 (multiple-dwelling) in common with the surrounding properties. The area is improved with a mixture of old single-family and multiple-family dwellings.

The adjacent property to the northeast is improved with a two-story wooden apartment building as well as the property to the northwest across Firmin Street. The lots abutting the subject property to the southeast are approximately 5 ft. lower in elevation and front on Boylston Street. One lot is vacant and the other has a dilapidated wooden structure (presumably a garage or a storage shack) built on the rear property line. Properties to the southwest front on Court Street and are similarly developed with a mixture of old wooden single and multiple-residential structures. The majority of the residential structures on Firmin Street have very shallow or no front yard setbacks.

Firmin Street is a 700 ft. long sloping dead-end street extending southwesterly from Temple Street with a 35 ft. right of way. The property involved is presently improved with three old wood frame dwelling units, a duplex located between two single-family dwellings; two oil wells, one at the northerly corner in the front yard of the single-family dwelling to the northeast, the other towards the

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southerly corner in the back yard of the single-family residence to the southwest. A large common oil storage tank for two wells measuring 5 ft. in diameter and 13 ft. in length is placed adjacent to the oil well in the rear yard.

The oil well located in the front yard is enclosed on three sides with a 6 ft. high chain link fence (photos 1 through 3). An 8 x 10 cardboard attached to the said fence identifys the well as "Well No. 1-Tom Pietrzyk" and a telephone number. No other identification was found. The oil pump (bears the brand name [Pacific Hydraulic Pumping Unit] and) is powered by an unconcealed electric motor. The pump however, at the time of the field inspection 9-12-69, was not in operation.

The oil well and storage tank located towards the southerly corner in the back yard had no identification. (As indicated in the attached plot plan marked Exhibit "A" and photographs,) the pumping unit is enclosed only on three sides with a 6 ft. in height wire fence. The gate panel indicated in the plot plan seemed to be damaged and was unhinged, thereby providing no barrier. The common oil storage tank is laid down horizontally approximately 4 ft. above a sunken platform surrounded by a fire well built flush with the surrounding finished grade of the back yard. At the time of the trip, the applicant, Mrs. Pietrzyk stated that a leak in the storage tank has forced a temporary suspension in oil pumping.

As indicated in the photograph,) the immediate vicinity of the tank and well were littered with oil soaked equipment and parts from the old oil pumping jack replaced by the electric pump and other miscellaneous debris. The sunken platform was filled with spilled oil and other oil soaked articles.

During the inspection of the site, the applicant, (an elderly woman,) appeared in the back yard to chase away the group of neighborhood children who seemed to be attracted by this oil well facility. She complained to this Investigator that she was forced to chase the children away from the area constantly.

The back yard of the subject property where the oil well is located and the driveway leading to the street have no paving or plantings that are considered essential elements to create a viable residential community. This state of negligent maintenance, however, is not confined to the subject property but is typical of other residential developments in the general area.

The existence of the oil well facilities in question, it appears, are not only objectionable to the existing developments in the immediate area, but they definitely create a potentially extremely hazardous condition by being an attractive nuisance to the numerous

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children living in the neighborhood. The facilities and their nature is incompatible with the more intensive type of development permitted in this R4-2 Zone and the maintenance of the well could very well preclude the proper redevelopment of the adjoining lots. The granting of the request at the time the zoning regulations require removal of other nonconforming buildings in the vicinity and throughout the City would not be in keeping with the intent and purpose of the Comprehensive Zoing Plan which provides for the eventual elimination of nonconforming uses of land and buildings in the residential zone.

Furthermore, the presence of an oil tank truck utilizing an extremely narrow hillside street within a residential area where there are little or no front yard setbacks in addition to these prominantly conspicuous oil tanks and oil soaked debris appear as elements quite contrary to those which constitute a viable living environment.

It is therefore recommended that the wells and tank either be totally removed from the property or that they be concealed in such a manner as not to be prejudicial to the existing and potential developments on the surrounding properties.

A similar request for a similar facility on a neighboring property located approximately 100 ft. to the north (335 Firmin Street) was granted for a term period of (2) two years under Z.A.I. Case No. 2621-0.

James M. Yoshinaga

JAMES M. YOSHINAGA
City Planning Associate

JMY:ss
9-16-69

FINDINGS OF FACT

Z.A.I. CASE NO. 2729-0
MARY PIETRZYK
(MAINTENANCE OF OIL WELL)

RECOMMENDATION: It is recommended that the application be denied.

After thorough, etc. (R4-2 Zone).

In the event the request is granted, it is suggested that the conditions be included following generally those incorporated in a copy of the determination of Z.A.I. Case No. 2651-0.

James M. Yoshinaga

JAMES M. YOSHINAGA
City Planning Associate

JMY:ss
9-16-69

V — City of Los Angeles Office of Zoning Administration staff report, Case No. ZA 85-1343(NC), January 30, 1986

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CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
OFFICE OF ZONING ADMINISTRATION

STAFF REPORT

January 30, 1986

Balubhai Gopalji Patel
2731 Beverly Boulevard
Los Angeles, CA 90057

Re: CASE NO. ZA 85-1343(NC)
NONCONFORMING USE
314 through 324 Firmin Street
Westlake Planning Area
Zone R4-2-0
D. M. 135 B 209
C. D. No. 4
EIR: Exempt
Legal Description:
Lots 8 and 9, Block
No. 26, Park Tract

ZONING ANALYST: JOHN M. SHEPPARD

REQUEST:

To permit the continued maintenance and operation of the existing oil wells and tank in the R4-2-0 (multiple dwelling) Zone.

SUBJECT PROPERTY:

The subject property consists of two terraced, interior, rectangular lots having a uniform depth of 125 feet, and a combined frontage of approximately 121 feet on the southeasterly side of Firmin Street. It is developed with one single-family dwelling on the northwesterly corner of said lot, a multiple-family dwelling and a single-family dwelling in the southwest corner of the lot, all dwellings are facing northwest on the southeasterly side of Firmin Street.

SURROUNDING PROPERTY:

Northerly

Adjoining properties to the north are zoned R4-2-0 and improved with older, one-story, multiple-family dwellings.

Southerly

Properties to the south across the vacant lot are zoned R4-2-0 and improved with older, two-story, multiple-family dwellings.

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Easterly

Adjoining properties to the east are zoned R4-2-0 and improved with older, one- and two-story, multiple-family dwellings.

Westerly

Properties to the west across Firmin Street are zoned R4-2-0 and improved with older, two-story, multiple-family dwellings.

STREETS AND CIRCULATION:

Firmin Street, adjoining the subject property, is designated a local street. It is a 700-foot-long, sloping, dead-end street extending southwesterly from Temple Street, and is dedicated 35 feet in width. Firmin Street is also improved with curbs, gutters, and sidewalks.

PREVIOUS CASES, AFFIDAVITS, PERMITS, ETC.:

Case No. ZAI 2729-0 (previous case for same property, copy attached) was for the continued maintenance and operation of the existing oil wells and tank. It appears that the equipment described in the previous report is present and still in use.

Case Nos. ZAI 78-006-0, ZAI 2621, and ZAI 2858 for property located at 335 Firmin Street were for the continued maintenance and use of two oil wells and tank with the latest authorization issued in 1978.

GENERAL PLAN, PLAN ELEMENTS, SPECIFIC PLANS AND MORATORIUMS:

Community Plan:

The adopted Westlake Community District Plan designates the subject property as medium density housing with 24+ to 40 dwelling units per gross acre, with corresponding zones of R4-2-0.

Flood Hazard Management Specific Plan:

The subject property does not lie in an area for which a flood insurance rate map has been prepared.

GENERAL COMMENTS:

The are three old, wood frame dwellings on said lot. Oil well No. 1 is properly identified per Condition No. 6 in previous authorization, (ZAI 27290) and is enclosed by a 6-foot-high by 3-foot-wide chain link fence. The oil well and its enclosure lie only 5 feet from the curb of the southeast side of Firmin Street and approximately 1½-foot from the dwelling (324 Firmin Street).

Oil well No. 2 and the tank are located in the southeast corner of said lot. The oil well is properly identified and is surrounded by a 6-foot chain link fence.

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The tank, which is approximately 5 feet in diameter and 7 feet high, is surrounded by a 3-foot cement wall with a 4-foot chain link fence fixed atop the wall.

The back yard of the subject property where oil well No. 2 and the tank are located is neither paved or maintained.

Driveways and yards of adjoining properties are not paved and there appears to be no maintenance of lots, driveways or yards. A 35-foot-wide street (Firmin) of unpaved and narrow driveways and lots must facilitate the movement of an oil tank truck for wells on said property and property at 335 Firmin Street. The movement of the trucks in this area may be a hazard to area residents.

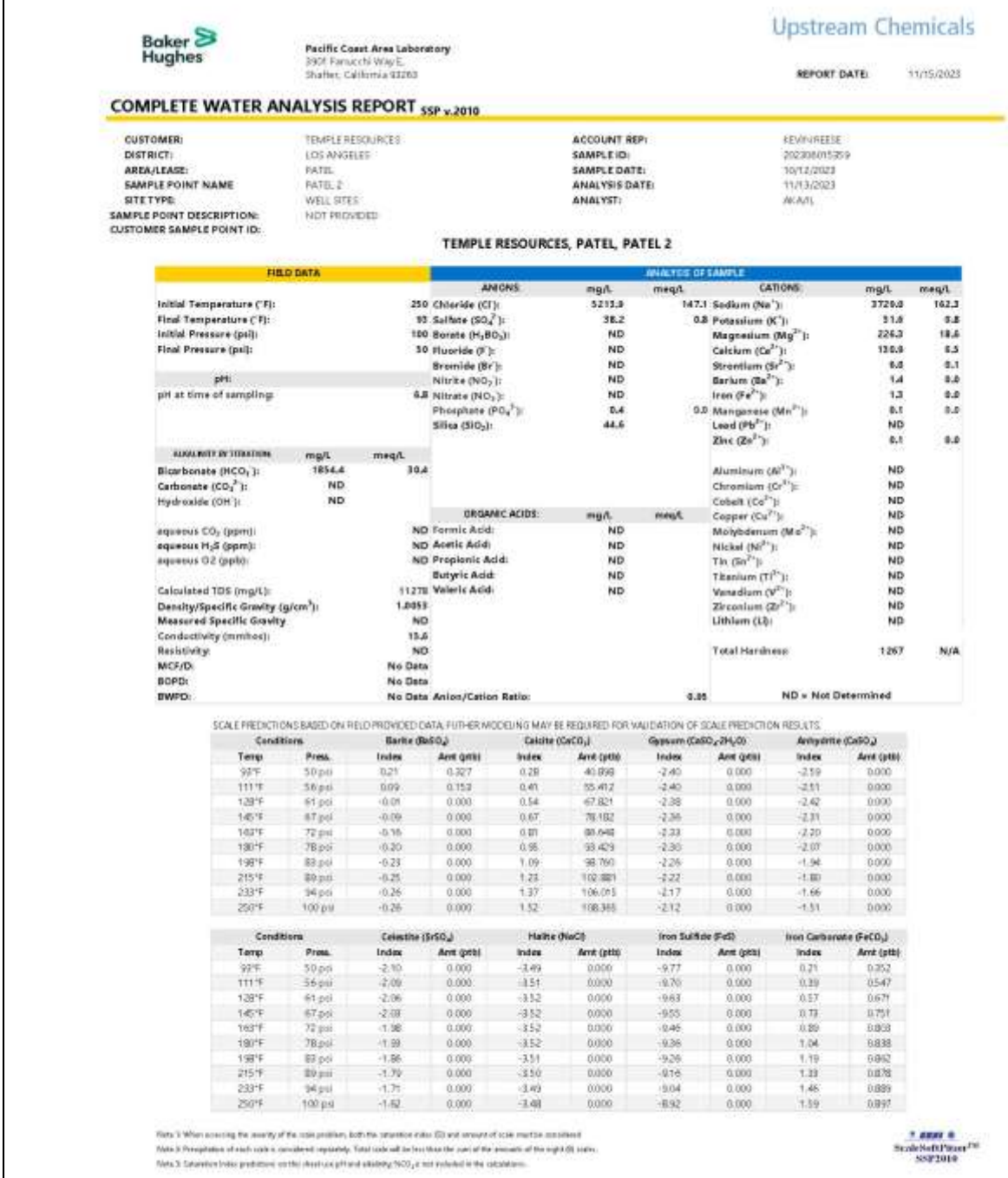
JOHN M. SHEPPARD
Zoning Analyst

JMS:ll

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Y — Pacific Coast Area Laboratory, Complete Water Analysis Report, Patel 2, sample dated October 12, 2023, reported November 15, 2023

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Baker Hughes

Pacific Coast Area Laboratory
390 Panucchi Way E.
Shafter, California 93263

Upstream Chemicals

REPORT DATE: 11/15/2023

COMPLETE WATER ANALYSIS REPORT SSP v.2010

CUSTOMER:	TEMPLE RESOURCES	ACCOUNT REP:	KEVIN REESE
DISTRICT:	LOS ANGELES	SAMPLE ID:	20230801535 9
AREA/LEASE:	PATEL	SAMPLE DATE:	10/12/2023
SAMPLE POINT NAME	PATEL 2	ANALYSIS DATE:	11/13/2023
SITE TYPE:	WELL SITES	ANALYST:	AK/AL
SAMPLE POINT DESCRIPTION:	NOT PROVIDED		
CUSTOMER SAMPLE POINT ID:			

TEMPLE RESOURCES, PATEL, PATEL 2

FIELD DATA

Initial Temperature (°F):	250
Final Temperature (°F):	93
Initial Pressure (psi):	100
Final Pressure (psi):	50
pH:	
pH at time of sampling:	6.8

ANALYSIS OF SAMPLE

ANIONS:	mg/L	meq/L
Chloride (Cl^-):	5213.9	147.1
Sulfate (SO_4^{2-}):	38.2	0.8
Borate ($H_2BO_3^-$):	ND	
Fluoride (F^-):	ND	
Bromide (Br^-):	ND	
Nitrite (NO_2^-):	ND	
Nitrate (NO_3^-):	ND	
Phosphate (PO_4^{3-}):	0.4	0.0
Silica (SiO_2):	44.6	

ALKALINITY BY TITRATION:	mg/L	meq/L
Bicarbonate (HCO_3^-):	1854.4	30.4
Carbonate (CO_3^{2-}):	ND	
Hydroxide (OH^-):	ND	

ORGANIC ACIDS:	mg/L	meq/L
Formic Acid:	ND	
Acetic Acid:	ND	
Propionic Acid:	ND	
Butyric Acid:	ND	
Valeric Acid:	ND	

CATIONS:	mg/L	meq/L
Sodium (Na^+):	3720.0	162.3
Potassium (K^+):	31.8	0.8
Magnesium (Mg^{2+}):	226.3	18.6
Calcium (Ca^{2+}):	130.9	6.5
Strontium (Sr^{2+}):	6.8	0.1
Barium (Ba^{2+}):	1.4	0.0
Iron (Fe^{2+}):	1.3	0.0
Manganese (Mn^{2+}):	0.1	0.0
Lead (Pb^{2+}):	ND	
Zinc (Zn^{2+}):	0.1	0.0
Aluminum (Al^{3+}):	ND	
Chromium (Cr^{3+}):	ND	
Cobalt (Co^{2+}):	ND	
Copper (Cu^{2+}):	ND	
Molybdenum (Mo^{2+}):	ND	
Nickel (Ni^{2+}):	ND	
Tin (Sn^{2+}):	ND	
Titanium (Ti^{3+}):	ND	
Vanadium (V^{2+}):	ND	
Zirconium (Zr^{2+}):	ND	
Lithium (Li^+):	ND	
Total Hardness:	1267	N/A

aqueous CO_2 (ppm):	ND
aqueous H_2S (ppm):	ND
aqueous O2 (ppb):	ND
Calculated TDS (mg/L):	11278
Density/Specific Gravity (g/cm³):	1.0053
Measured Specific Gravity	ND
Conductivity (mmhos):	15.6
Resistivity:	ND
MCF/D:	No Data
BOPD:	No Data
BWPD:	No Data
Anion/Cation Ratio:	0.85

ND = Not Determined

SCALE PREDICTIONS BASED ON FIELD PROVIDED DATA. FUTHER MODELING MAY BE REQUIRED FOR VALIDATION OF SCALE PREDICTION RESULTS.

Conditions		Barite ($BaSO_4$)		Calcite ($CaCO_3$)		Gypsum ($CaSO_4 \cdot 2H_2O$)		Anhydrite ($CaSO_4$)	
Temp	Press.	Index	Amt (pts)	Index	Amt (pts)	Index	Amt (pts)	Index	Amt (pts)
93°F	50 psi	0.21	0.327	0.28	40.898	-2.40	0.000	-2.59	0.000
111°F	56 psi	0.09	0.153	0.41	55.412	-2.40	0.000	-2.51	0.000
128°F	61 psi	-0.01	0.000	0.54	67.821	-2.38	0.000	-2.42	0.000
145°F	67 psi	-0.09	0.000	0.67	78.182	-2.36	0.000	-2.31	0.000
163°F	72 psi	-0.16	0.000	0.81	88.648	-2.33	0.000	-2.20	0.000
180°F	78 psi	-0.20	0.000	0.95	98.429	-2.30	0.000	-2.07	0.000
198°F	83 psi	-0.23	0.000	1.09	98.760	-2.26	0.000	-1.96	0.000
215°F	89 psi	-0.25	0.000	1.23	102.881	-2.22	0.000	-1.80	0.000
233°F	94 psi	-0.26	0.000	1.37	106.015	-2.17	0.000	-1.66	0.000
250°F	100 psi	-0.26	0.000	1.52	108.365	-2.12	0.000	-1.51	0.000

Conditions		Celestite ($SrSO_4$)		Halite ($NaCl$)		Iron Sulfide (FeS)		Iron Carbonate ($FeCO_3$)	
Temp	Press.	Index	Amt (pts)	Index	Amt (pts)	Index	Amt (pts)	Index	Amt (pts)
93°F	50 psi	-2.10	0.000	-3.49	0.000	-9.77	0.000	0.21	0.352
111°F	56 psi	-2.09	0.000	-3.51	0.000	-9.70	0.000	0.39	0.547
128°F	61 psi	-2.06	0.000	-3.52	0.000	-9.63	0.000	0.57	0.671
145°F	67 psi	-2.03	0.000	-3.52	0.000	-9.55	0.000	0.73	0.751
163°F	72 psi	-1.98	0.000	-3.52	0.000	-9.46	0.000	0.89	0.808
180°F	78 psi	-1.93	0.000	-3.52	0.000	-9.36	0.000	1.04	0.838
198°F	83 psi	-1.86	0.000	-3.51	0.000	-9.26	0.000	1.19	0.862
215°F	89 psi	-1.79	0.000	-3.50	0.000	-9.16	0.000	1.33	0.878
233°F	94 psi	-1.71	0.000	-3.49	0.000	-9.04	0.000	1.46	0.889
250°F	100 psi	-1.62	0.000	-3.48	0.000	-8.92	0.000	1.59	0.897

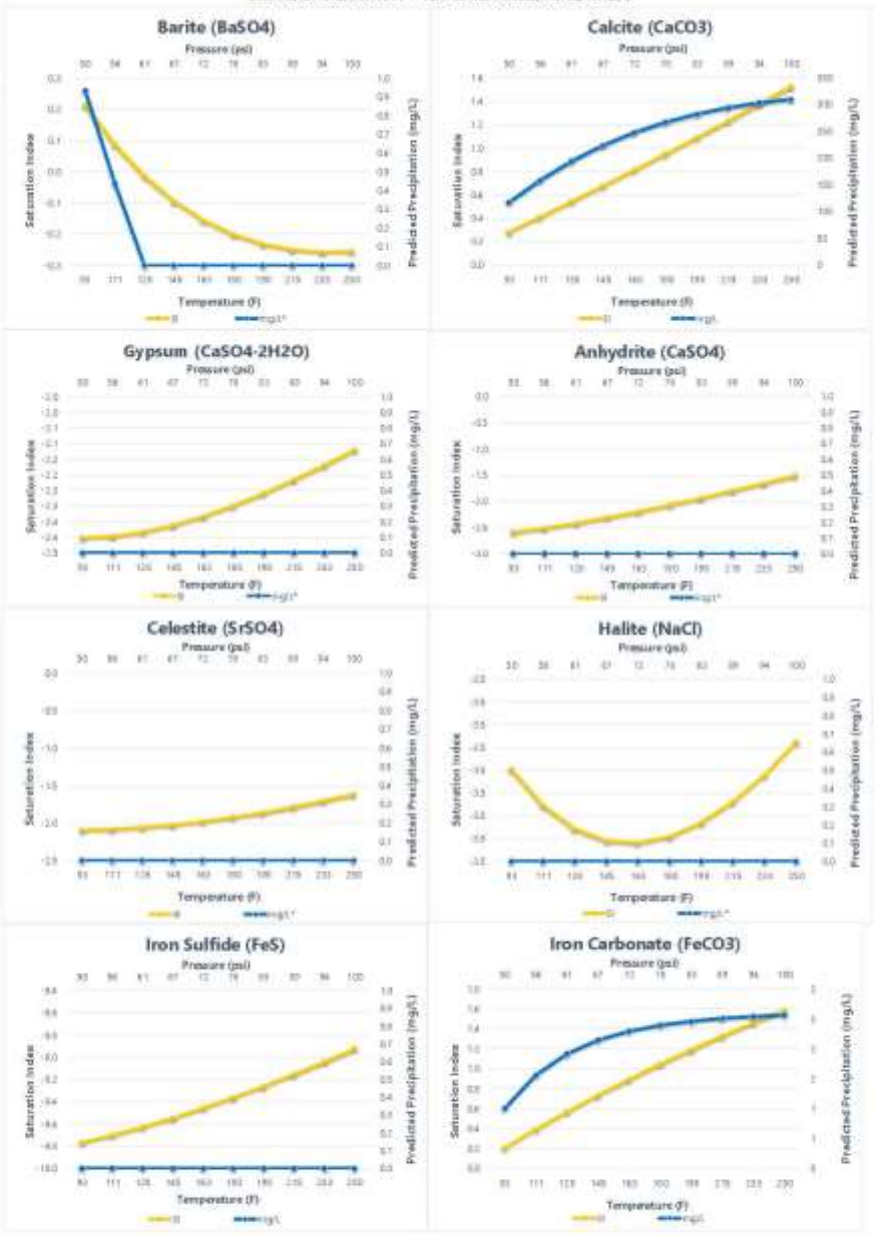
Note 1: When assessing the severity of the scale problem, both the saturation index (SI) and amount of scale must be considered.
Note 2: Precipitation of each scale is considered separately. Total scale will be less than the sum of the amounts of the eight (8) scales.
Note 3: Saturation Index predictions on this sheet use pH and alkalinity (HCO_3) as not included in the calculations.

ScaleSoftPitzer™ SSP2010

Comments:

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SAMPLE ID: 2023060015359 TEMPLE RESOURCES, PATEL, PATEL 2



SCALE PREDICTIONS BASED ON FIELD PROVIDED DATA; FURTHER MODELING MAY BE REQUIRED FOR VALIDATION OF SCALE PREDICTION RESULTS.

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