



Freeport-McMoRan Oil & Gas
Land Department
5640 S Fairfax Ave.
Los Angeles, CA 90056

Telephone: 323.298.2211

July 5, 2013

City of Los Angeles
Department of Planning
Office of Zoning Administration
200 N. Spring Street, 7th Floor
Los Angeles, CA 90012

RE: Application for Determination of Methods and Conditions for Drilling
Jefferson Controlled Drill Site
Case No. ZA-17528

Dear Associate Zoning Administrator:

Freeport-McMoRan Oil & Gas LLC respectfully requests approval to use the above referenced controlled drill site to drill and re-drill three (3) wells as more particularly describe in the materials submitted herewith. Attached hereto are Additional Comments that Application believes will be of assistance to you in rendering your decision.

Applicant wishes to draw your attention to the last Associate Zoning Administrator's Finding of Fact, that "***the current conditions of operations at this location are effective in reasonably mitigating any possible impact of the use of the site for drilling operations.***" (ZA Case No. ZA-17528(PA3), dated April 22, 2008, Finding of Fact No. 3, emphasis added.) (See Exhibit 7.) Because of this Finding, a public hearing was waived in 2008.

Accordingly, as was done in 2008, Applicant respectfully requests that the public hearing in this matter be waived. If a public hearing is set, Applicant's representative requests that the matter not be set for hearing on the following dates: August 14, 2013 through August 25, 2013.

Sincerely,

A handwritten signature in black ink that reads 'L. Rae Connet'.

L. Rae Connet
Contract Land Advisor
(323) 298-2211 (office)
(310) 486-4955 (mobile)

ZA 17528

APPLICATION FOR DETERMINATION
OF METHODS AND CONDITIONS
2013
JEFFERSON CONTROLLED DRILL SITE

Additional Applicant Comments

Freeport-McMoRan Oil & Gas LLC respectfully requests approval to use the above referenced controlled drill site, located in Oil Drilling District U-124, to drill and re-drill three (3) wells as follows: drill one (1) new Class "B" well (water injection well) to bottom in Oil Drilling District U-124; re-drill one (1) Class "A" well (oil production well) and one (1) Class "B" well (water injection well), both to bottom in Oil Drilling District U-135.

Applicant wishes to draw your attention to the Zoning Administration's Finding of Fact, that ***"the current conditions of operations at this location are effective in reasonably mitigating any possible impact of the use of the site for drilling operations."*** (ZA Case No. ZA-17528(PA3), dated April 22, 2008, Finding of Fact No. 3, emphasis added.) (See Exhibit 7.) Because of this Finding, a public hearing was waived in 2008.

Request for Waiver of Public Hearing. As was done in 2008, Applicant respectfully requests that the public hearing in this matter be waived.

The Jefferson Drill Site is located at 1349-1375 Jefferson Boulevard, Los Angeles, California, more particularly described as follows:

Lots 1, 2, 3, 4, 7, 8, 9, 10, 21, 22, 23 and 24 of Block G of the Poole and James Tract, in the City of Los Angeles, County of Los Angeles, State of California, as per map recorded in Book 10, Page 194 of Maps, in the office of the County Recorder of said County.

Enclosed as Exhibit 1 is a plot plan depicting the existing facilities at the controlled drill site. The subject project is a 1.86-acre, rectangular, level parcel of land comprised of 12 record lots located on the north side of Jefferson Boulevard between Van Buren Place and Budlong Avenue. The drill site is classified in the C2-1VL-O, R2-1-O and RD1.5-1-O Zones and is developed as an Urbanized Controlled Drill Site identified as the "Jefferson Drill Site" as part of the Las Cienegas Oil Field. The drill site is located in Urbanized Oil Drilling District U-124 as established by Ordinance No. 129,760. The location is in Council District 8.

Oil drilling and injection activities on the controlled drill site have been undertaken since 1965 in accordance with the terms and conditions of Case No. Z.A. 17528 dated April

29, 1965. Various authorities followed, with the last case on record being a determination of methods and conditions to re-drill one Class "A" well, dated April 22, 2008 in Case No. Z.A. 17528(PA3).

Enclosed as Exhibit 2 is a well path map showing the proposed well corridors and bottom-hole locations for Well #J-45, #J-31RD and #J-32RD.

Applicant hereby requests a determination of the methods and conditions to drill one (1) new Class "B" well and to re-drill one (1) Class "A" well and re-drill one (1) Class "B" oil well to be bottomed as shown on in the following chart:

	Well Number	Oil Drilling District
1	J-45	U-124
2	J-31RD	U-135
3	J-32RD	U-135

Urbanized Oil Drilling District No. U-124 was established by Ordinance No. 129,760. (Exhibit 3 includes copies of all relevant City Ordinance.) Under various authorities, a total of at least 24 Class "A" production wells have been authorized to be drilled and bottomed in U-124. At present, there are nine (9) Class "A" wells actively producing, plus six (6) idle producers. Proposed Well #J-45 is a Class "B" injection well. There is no restriction on the number of injection wells that may be drilled and bottomed in U-124. There are currently six (6) active injectors (Class "B" wells) bottomed in U-124. Applicant requests the authority to drill one (1) new Class "B" injector well, named Well #J-45, to be bottomed in U-124. After proposed Well #J-45 is drilled, there will remain nine (9) active and six (6) idle producers bottomed in U-124.

Urbanized Oil Drilling District No. U-135 was established by Ordinance No. 131,452, which authorized the Zoning Administrator to permit drilling and production from a maximum of six (6) Class "A" wells. Currently, Wells #J-30RD and #J-31 are the only active producers (Class "A" wells) bottomed in U-135. There is also one (1) active injection well (Class "B" well), one (1) idle injection well. Applicant requests authority to re-drill Class "A" Well# J-31 as Well #J-31RD and to re-drill Class "B" well #J-32 as Well #J-32RD. Upon approval of this application and drilling of the proposed well, there will remain a total of two (2) Class "A" wells bottomed in U-135.

Applicant Freeport-McMoRan Oil & Gas is the fee owner of the subject property. However, this fact differs from the ownership shown on the City's ownership records. Applicant, Freeport-McMoRan Oil & Gas acquired the property by merger with Plains Exploration & Production Co on May 31, 2013. (See Certificate of Merger -Exhibit 4.) Plains Exploration & Production Co. acquired the property by merger with Brown PXP Properties, LLC effective December 31, 2008. (See Certificate of Merger – Exhibit 5.) Brown PXP Properties, LLC acquired the property by Grant Deed from Bentley-Simonson, Inc. (See Exhibit 6.). PXP, first as the operator for Brown PXP Properties,

then subsequently as the owner of the drill site, has been a responsible operator with an exemplary safety record with respect to all controlled drill sites within the City. Freeport-McMoRan Oil & Gas, as the surviving entity after the merger, will continue the exemplary safety record established by PXP.

A chronology of the zoning administration cases affecting the controlled drill site and copies of the letters authorizing drilling in those cases, along with copies of all prior Zoning Administration letters of determination are enclosed for ease of reference as Exhibit 7.

We have also included in the application package Plains Exploration & Production Company's Spill Prevention Control and Countermeasure (SPCC) Plan dated January 2011, which will continue to be in effect under the management of Freeport-McMoRan Oil and Gas LLC. (See Exhibit 8.)

The proposed drilling operation will require approximately 90 days to complete from the time drilling begins. In addition, installation and removal of a temporary sound wall will require another 15 days before drilling commences and 15 days following the conclusion of drilling. The sound wall will be in place for 120 days or less.

Once Zoning approval is given, applicant needs time to schedule a drilling rig. Therefore, applicant requests that the time to complete drilling operations granted by the Zoning Administrator pursuant to this application be tolled until initial operations are begun and that Applicant be given two years from the commencement of drilling operations to complete its drilling program.

Applicant requests that you approve drilling operations to be conducted 24 hours a day, seven days a week. Such request is consistent with the approval in the original Z.A. Case No. 17528 in 1965, and with the last Plan Approval in Case No. ZA-17528(PA3) on April 22, 2008.

To maintain reasonable noise levels during drilling operations, extensive sound mitigation controls were placed on the controlled drill site in 2006. Condition No. 3 in the Plan Approval dated April 22, 2008 in Case No. Z.A. 17528(PA3) delineates the sound mitigation system and noise controls implemented. A copy of the Drilling Noise and Mitigation Compliance Report of Behrens and Associates, Inc., which demonstrates the successfulness of the mitigation efforts is also attached as Exhibit 9.

Also included are Photos of the Drill Site (Exhibit 10), a Vicinity Map (Exhibit 11), the Assessor Parcel Map (Exhibit 12), the ZIMAS report (Exhibit 13) and the BTC Receipt, Mailing Labels and Perjury Statement (Exhibit 14). For ease of reference, an Exhibit List follows. If there are any other materials required in order to better evaluate this application, please contact Applicant's representative.

Exhibit #	Description
1	Plot Plan
2	Well Path Map
3	City Ordinances
4	Certificate of Merger into Freeport-McMoRan Oil & Gas
5	Certificate of Merger into Plains Exploration & Production Co.
6	Drill Site Deed
7	Zoning Administration Plan Approvals
8	Spill Prevention Control and Countermeasure (SPCC) Plan
9	Sound Report
10	Drill Site Photos
11	Vicinity Map
12	Assessor Parcel Map
13	Zimas Report and Map
14	Mailing Information and Receipt