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Public Counters

Department of City Planning

Department of Building and Safety

All Interested Parties

CASE NO. ZA-2025-2976-ZAI
ZONING ADMINISTRATOR'S
INTERPRETATION

CEQA: ENV-2025-3305-CE

RELATED CASES:
ZA-2022-8997-ZAI-1A,
ZA Memo No. 141,
ZA Memo No.133

LAMC Sections: 13.01-H, 13.01-I

"Well Maintenance"

CITYWIDE

This Zoning Administrator's Interpretation (ZAI) interprets what drill site activities qualify as "well maintenance". This ZAI (ZA-2025-2976-ZAI) replaces a previous ZAI (ZA-2022-8997-ZAI-1A) interpreting "Well Maintenance", dated October 4, 2023, and rescinded on May 29, 2025. **Well maintenance** for oil and gas extraction sites shall be interpreted as any scope of work that meets either of the following two criteria:

1. A scope of work that requires a Notice of Intention "Rework Permit" to carry out a rework project on a well from the California Geologic Energy Management Division (CalGEM).¹
2. A scope of work that requires notification per the South Coast Air Quality Management District's (SCAQMD) Rule 1148.2 - "Notification and Reporting Requirements for Oil and Gas Well and Chemical Suppliers" for "Well Rework"

¹ Permitting, Forms, and Compliance - Oil and Gas Requirements and Forms, Well Permit Information, Rework/Redrills. California Energy Geologic Management Division, 2022. <https://www.conservation.ca.gov/calgem/for_operators>

and/or “Injection” including one or more of the following activities: acidizing, hydraulic fracturing, gravel packing, maintenance acidizing, matrix acidizing, and acid fracturing.²

AUTHORITY OF THE ZONING ADMINISTRATOR TO INTERPRET ZONING REGULATIONS

Section 13A.1.7.D.2 of Chapter 1A of the Los Angeles Municipal Code provides, in pertinent part, as follows:

“2.b. **Zoning Administrator Interpretation.** The Zoning Administrator shall have authority to interpret zoning regulations when the meaning of the regulation is not clear, either in general or as it applies to a specific property or situation.

CONTEXT

The Los Angeles Municipal Code (LAMC) contains several Zoning Code provisions that regulate oil and gas drill sites. These sites are primarily regulated by LAMC Section 13.01. LAMC Section 13.01-H of Chapter 1 states that any person desiring to “drill, deepen, or **maintain an oil well...**” requires a determination from the Zoning Administrator. The Zoning Code does not specify what activities might constitute a desire to “maintain an oil well.”

In the past several decades the Zoning Administrator has reviewed and determined when a proposed scope of work at a drill site qualifies as a well maintenance project on a case by case basis.

LAMC Section 13.01-H and Section 13.01-I, reads as follows (underline added):

*H. “**Drilling Site Requirements.** Any person desiring to drill, deepen or maintain an oil well in an oil drilling district that has been established by ordinance, or to drill or deepen and subsequently maintain an oil well in the M3 Zone within 500 feet of a more restrictive zone shall file an application in the Department of City Planning on a form provided by the Department, requesting a determination of the conditions under which the operations may be conducted.”*

*I. “**Permits.** (Amended by Ord. No. 173,268, Eff. 7/1/00, Oper. 7/1/00.) No person shall drill, deepen or maintain an oil well or convert an oil well from one class to the other and no permits shall be issued for that use, until a determination has been made by the Zoning Administrator or Area Planning Commission pursuant to the procedure prescribed in Subsection H of this section.”*

² Compliance - Oil and Gas Well Electronic Notification and Reporting (Rule 1148.2) - South Coast Air Quality Management District, 2022.
<<https://www.aqmd.gov/home/rules-compliance/compliance/1148-2>>

This ZAI formally interprets the term, **well maintenance**, as applicable in LAMC Sections 13.01-H and I. More specifically, this ZAI interprets the term “maintain” in the LAMC Sections 13.01-H and I. In the past, the Office of Zoning Administration (OZA) has been asked by operators, advocacy groups, and interested parties to interpret what constitutes well maintenance as it appears in the Zoning Code.

This ZAI formally interprets what the term, well maintenance, entails as needed for the land use regulation of drill sites set forth in LAMC Sections 13.01-H and 13.01-I.

BACKGROUND/ HISTORY

On December 2, 2022, the City Council approved Ordinance No. 187,709, which became effective on January 18, 2023, amending various parts of the LAMC relating to oil drilling. Among other changes, it eliminated LAMC Sections 13.01-H and 13.01-I and amended LAMC Section 12.23-C.4(a) to prohibit well maintenance, drilling, redrilling, and deepening except to prevent or respond to a threat to public health, safety, or the environment, as determined by the Zoning Administrator.

To implement the Ordinance, the Department of City Planning’s Office of Zoning Administration (OZA) issued a Zoning Administrator Interpretation (ZAI) defining “well maintenance” (Case No. ZA-2022-8997-ZAI), and a Zoning Administrator Memorandum No. 141 (ZA Memo 141), which set forth the procedures for applying for Health and Safety Exemptions under the Ordinance .

The Oil Ordinance was challenged by oil operators in four related lawsuits, with the lead case being Warren E&P, Inc. v. City of Los Angeles, LASC Case No. 23STCP00060.³ In addition, on January 30, 2023, an appeal was filed regarding the ZAI (Case No. ZA-2022-8997-ZAI-1A). On September 14, 2023, the City Planning Commission, as the appellate body, adopted a modified Zoning Administrator’s Interpretation (Case No. ZA-2022-8997-ZAI-1A), dated October 4, 2023.

On September 6, 2024, Los Angeles Superior Court Judge Curtis A. Kin found that the City’s Oil and Gas Drilling Ordinance (Ordinance No. 187,709), the ZAI (Case No. ZA-2022-8997-ZAI-1A), and ZA Memo No. 141 were preempted by state law.

Approximately three weeks later on September 25, 2024, Governor Newsom signed into law Assembly Bill (AB) 3233, which added Section 3106.1 to the Public Resources Code to provide local governments with authority to regulate oil and gas operations, notwithstanding other state law. AB 3233 became effective on January 1, 2025.

As part of the litigation and settlement, the City of Los Angeles rescinded the Oil Ordinance, finalized on June 2, 2025. The Office of Zoning Administration also issued a

³ "Warren E and P, Inc., et al. v. City of Los Angeles, et al." Council File No. 24-1466, LACityClerk Connect. <cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=24-1466>

rescission of the ZAI (Case No. ZA-2022-8997-ZAI-1A), and ZA Memo No. 141 on May 29, 2025. Upon the rescission of Ordinance No. 187,709, the amended or deleted definitions, paragraphs, subdivisions or subsections of Sections 12.03, 12.20, 12.23, 12.24, and 13.01 of Chapter 1 of the Los Angeles Municipal Code, return to the same language and effect as they had prior to their amendment or deletion by Ordinance No. 187,709.

Another notable state legislation which became effective on June 28, 2024, was Senate Bill (SB) 1137. The bill was signed by Governor Newsom on September 16, 2022, however, it was temporarily paused due to the legislation having qualified for a ballot initiative. After the ballot initiative was withdrawn, SB 1137 became effective on June 28, 2024. CalGEM resumed implementation of the new regulations, including a prohibition on new drilling, deepening, and rework (well maintenance) permits if the oil well is within 3,200-feet of a sensitive receptor. SB 1137 contains clear language that CalGEM can issue permits if the oil well activity is necessary to prevent or respond to a threat to public health, safety, or the environment. CalGEM is determining on a case-by-case basis if a scope of work meets the criteria for such a health and safety exception.

It is necessary to issue this new ZAI to interpret the term well maintenance in relation to the reinstated and reactivated sections of the LAMC noted above, specifically, as found in 13.01-H and 13.01-I.

DISCUSSION

The OZA relied on specific sources to interpret the scopes of work for well maintenance that include, but are not limited to: federal regulatory agency standards, state regulatory agency standards, scientific articles, and engineering publications related to petroleum engineering and oil extraction. The OZA also consulted with the City's Petroleum Administrator, Fire Department, SCAQMD, and CalGEM.

The OZA examined a growing body of research and studies regarding oil and gas wells. On June 21, 2024, the California Oil & Gas Public Health Rulemaking Scientific Advisory Panel, a group commissioned by the California Department of Conservation, published *Public Health Dimensions of Upstream Oil and Gas Development in California: Scientific Analysis and Synthesis to Inform Science-Policy Decision Making* that found adverse health outcomes increase within 1 kilometer (3,281 feet) of oil and gas wells for sensitive receptors (such as residences and child-care centers). These affected communities include low-income neighborhoods and communities of color. Also included and examined in the study was the scientific advisory panel's response (October 2021) to CalGEM regarding the effects of oil extraction and production on

public health, which illustrates the need to better regulate well maintenance activities.⁴ This scientific advisory panel, consisting of scientists, engineers, and public health analysts, determined that extraction activities may have negative external effects on the health and well-being of people within the vicinity of such operations. In another study published in April 2017, researchers examined the overlap of the type of chemicals and trade products used in hydraulic fracturing activities and routine maintenance acidizing projects. This 2017 study concluded that there is substantial overlap given the number of similar chemicals used during these activities.⁵ This analysis was done specifically using SCAQMD data, which is particularly relevant as this agency also regulates oil drill sites for air emissions and odors. These aforementioned studies confirm the potential negative external effects on community public health and on the environment, and serve as further justification for formally establishing the procedures for a discretionary review for well maintenance activities, consistent with the intent and objectives of Sections 13.01-H and 13.01-I.

In reviewing well maintenance projects, regulatory agencies such as CalGEM and SCAQMD have narrow purviews in what they can regulate. Therefore, the Zoning Administrator's authority under the local zoning code to review maintenance activities in a more comprehensive manner, can help further reduce, if necessary, any land use impacts. Specifically, as it relates to oil and gas extraction, CalGEM focuses on subsurface and near surface activities whereas SCAQMD regulates the effects on air quality, including emissions and pollutants. These agencies do not regulate other significant land use impacts for oil and gas extraction activities. Such land use impacts include, but are not limited to: traffic/transportation circulation, noise decibel levels, aesthetics, and noxious odors resulting from proposed activities conducted at drill sites.

CalGEM requires a state permit known as a "Notice of Intention" permit for specific oil well activities identified by CalGEM.⁶ With regards to SCAQMD's Rule 1148.2, that rule requires operators to submit notification to SCAQMD for specific oil well activities and also requires operators to mail notification to sensitive receptors (e.g. residences) within a 1,500-ft. radius of the oil well facility.⁷

Well maintenance activities, as described herein, may have negative land use impacts on surrounding communities such as elevated noise levels, frequent odor events, increased emissions exposure, spill incidents affecting the public right-of-way, truck traffic congestion on local streets, removal of on-street parking, traffic congestion on

⁴ "Public Health Dimensions of Upstream Oil and Gas Development in California: Scientific Analysis and Synthesis to Inform Science-Policy Decision Making", California Oil & Gas Public Health Rulemaking Scientific Advisory Panel. Commissioned by the CA Department of Conservation. June 21, 2024 <https://www.conservancy.ca.gov/calgem/Documents/Public%20Health%20Panel%20Final%20Report_20240621.pdf>

⁵ "Comparison of chemical-use between hydraulic fracturing, acidizing, and routine oil and gas development", Physicians, Scientists, and Engineers for Healthy Energy (funded by UC Berkeley and U.S. Department of Energy grants). Analyzes the usage of chemicals from South Coast AQMD disclosure data and concludes that there is overlap between fracking chemicals and 'maintenance acidizing' chemicals. April, 2017.

⁶ Well Permit Information portal, California Geologic Energy Management Division online website, July 2022, https://www.conservancy.ca.gov/calgem/for_operators

⁷ Compliance - Oil and Gas Well Electronic Notification and Reporting (Rule 1148.2) - South Coast Air Quality Management District, 2022. <<https://www.aqmd.gov/home/rules-compliance/compliance/1148-2>>

local streets, and lack of effective screening for drill site equipment. These are precisely the types of land use impacts that LAMC Sections 13.01-H and 13.01-I were meant to address to protect the health and safety of surrounding neighborhoods and the public. As such, the Zoning Administrator's interpretation and review of well maintenance activities is consistent with the intent of Sections 13.01-H and 13.01-I, and is meant to implement the pre-existing safeguards in those sections. The Zoning Administrator's interpretation and review of these activities allow for a more comprehensive analysis of proposed well maintenance activities and ability to mitigate any potential impacts, if necessary.

The Zoning Administrator's Interpretation establishes a definition that facilitates the implementation of LAMC Sections 13.01-H and 13.01-I, and further advances the City's goal to prioritize the safety and quality of livability for local residents while providing an opportunity for operators to keep wells functioning in a safe and compliant manner.

Overview of Oil and Gas Well Activities Considered as Well Maintenance

Regulatory standards from agencies, primarily CalGEM and SCAQMD, helped shape the decision to define what activities qualify as well maintenance. Per state regulations, when operators propose to conduct specific well maintenance activities (such as maintenance acidizing or a well recasing), operators are required to apply for a permit and/or submit notification to various regulatory agencies such as SCAQMD or CalGEM.

For example, when an operator wishes to conduct maintenance acidizing on a well, the operator must disclose a chemical use list to SCAQMD and the operator sends an electronic notification of the proposed work to SCAQMD. Members of the public can subscribe to receive these notifications when an operator plans to conduct the proposed maintenance acidizing project or any other project that requires notification pursuant to SCAQMD Rule 1148.2. In this example, under the authority of LAMC Section 13.01-H, and per this ZAI, the Zoning Administrator would review this request for maintenance acidizing because it requires online notification per SCAQMD's Rule 1148.2. As part of the discretionary review pursuant to LAMC Section 13.01-H, the Zoning Administrator could include conditions to minimize land use impacts to the local vicinity.

Implementation per LAMC Section 13.01-H:

ZA Memo 133, dated September 19, 2016, establishes a comprehensive set of procedures and policies for the acceptance and processing of oil drilling applications pursuant to LAMC Section 13.01-H. This Section requires any person (or operator/applicant) seeking to "drill, deepen, or maintain an oil well ... [to] file an application in the Department of City Planning...". ZA Memo 133 has been and will continue to be, unless updated, modified, or superseded by other procedures, the guiding document for operators (or applicants) seeking approvals pursuant to LAMC

Section 13.01-H. Operators (or applicants) are required to submit an application for a discretionary review that includes a public hearing, mailing notice, and additional review standards. Since 2016, when ZA Memo 133 was released, the OZA has been engaged in reviewing and determining scopes of work that qualify as maintenance and warrant a discretionary review. The ZA Memo 133, in conjunction with this ZAI and its interpretation of oil well maintenance activities, provide the procedures for implementing the preexisting review criteria set forth in Section 13.01-H.

The well maintenance activities listed in this ZAI are permitted only when filed, reviewed, and approved, pursuant to both the applicable code section and appropriate procedures as established thereto.

DETERMINATION

For the reasons set forth above, “**well maintenance**” is interpreted to include any scope of work that meets any of the following criteria:

1. A scope of work that requires a Notice of Intention “Rework Permit” to carry out a rework project on a well from the California Geologic Energy Management Division (CalGEM).⁸
2. A scope of work that requires notification per the South Coast Air Quality Management District’s (SCAQMD) Rule 1148.2 - “Notification and Reporting Requirements for Oil and Gas Well and Chemical Suppliers” for “Well Rework” and/or “Injection” including one or more of the following activities: acidizing, hydraulic fracturing, gravel packing, maintenance acidizing, matrix acidizing, and acid fracturing.⁹

Well Servicing. Repair and servicing work may be carried out on existing wells if the scope of work does not meet the criteria for well maintenance, as described in this ZAI. Work activities conducted on the wells that do not meet the criteria for well maintenance shall be considered well servicing. Examples of well servicing can include projects such as well pump replacement or maintenance of underground and/or aboveground storage tanks that service the oil well operations.

This interpretation shall be published pursuant to the LAMC and administrative practice of the OZA.

⁸ Permitting, Forms, and Compliance - Oil and Gas Requirements and Forms, Well Permit Information, Rework/Redrills. California Energy Geologic Management Division, 2022. <https://www.conservation.ca.gov/calgem/for_operators>

⁹ Compliance - Oil and Gas Well Electronic Notification and Reporting (Rule 1148.2) - South Coast Air Quality Management District, 2022. <<https://www.aqmd.gov/home/rules-compliance/compliance/1148-2>>

CEQA

This ZAI provides a definition that assists in the procedural implementation of LAMC Sections 13.01-H and 13.01-I. The issuance of this ZAI that defines “well maintenance” is not a “project” as that term is defined by CEQA Guidelines, Section 15378 as it constitutes an administrative and procedure-making activity to assist in the implementation of the City’s preexisting Zoning Code provisions regarding oil well sites. Even assuming that the ZAI is considered a project, the ZAI is nevertheless exempt under the Class 8 and common sense exemptions. The ZAI provides a definition of oil well maintenance to implement a review process intended to minimize land use impacts, such as elevated noise levels, frequent odor events, increased emissions exposure, spill incidents affecting the public right-of-way, and truck traffic congestion, among others. Thus, the ZAI is an action taken by a regulatory agency, as authorized by local ordinance, to assure the maintenance, restoration, enhancement, or protection of the environment. Moreover, the ZAI only provides a definition and interpretation of preexisting language in the Zoning Code to assist in the implementation of a previously-established application process, and does not have the potential for causing a significant effect on the environment.

EFFECTIVE DATE

This determination will become effective after June 27, 2025, unless an appeal is filed with the Department of City Planning. An appeal application must be submitted and paid for before 4:30 PM (PST) on the final day to appeal the determination. Should the final day fall on a weekend or legal City holiday, the time for filing an appeal shall be extended to 4:30 PM (PST) on the next succeeding working day. Appeals should be filed early to ensure the Development Services Center (DSC) staff has adequate time to review and accept the documents, and to allow appellants time to submit payment.

An appeal may be filed utilizing the following options:

Online Application System (OAS): The OAS (<https://planning.lacity.org/oas>) allows entitlement appeals to be submitted entirely electronically by allowing an appellant to fill out and submit an appeal application online directly to City Planning’s DSC, and submit fee payment by credit card or e-check.

Drop off at DSC. Appeals of this determination can be submitted in-person at the Metro or Van Nuys DSC locations, and payment can be made by credit card or check. City Planning has established drop-off areas at the DSCs with physical boxes where appellants can drop off appeal applications; alternatively, appeal applications can be filed with staff at DSC public counters. Appeal applications must be on the prescribed forms, and accompanied by the required fee and a copy of the determination letter.

Appeal applications shall be received by the DSC public counter and paid for on or before the above date or the appeal will not be accepted.

Forms are available online at <http://planning.lacity.org/development-services/forms>.
Public offices are located at:

Metro DSC	Van Nuys DSC
201 N. Figueroa Street Los Angeles, CA 90012 planning.figcounter@lacity.org (213)482-7077	6262 Van Nuys Boulevard Van Nuys, CA 91401 planning.mbc2@lacity.org (818) 374-5050
South LA DSC	West LA DSC
(In person appointments available on Tuesdays and Thursdays 8am-4pm only) 8475 S. Vermont Avenue 1st Floor Los Angeles, CA 90044 planning.southla@lacity.org	(CURRENTLY CLOSED) 1828 Sawtelle Boulevard West Los Angeles, CA 90025 planning.westla@lacity.org (310) 231-2901



QR Code to
Online Appeal
Filing



QR Code to Forms for
In-Person Appeal Filing



QR Code to BuildLA
Appointment Portal for
Condition Clearance

City Planning staff may follow up with the appellant via email and/or phone if there are any questions or missing materials in the appeal submission, to ensure that the appeal package is complete and meets the applicable LAMC provisions.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

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