
Safety and Oil Spill Prevention Audit

California Resources
Corporation
Long Beach Unit
Broadway & Mitchell
Facility

October 2025

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Executive Summary

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EXECUTIVE SUMMARY

Safety Audit of California Resources Corporation Long Beach Unit – B&M Facility

A Safety and Oil Spill Prevention Audit of the California Resources Corporation (CRC) Long Beach Unit (LBU) Broadway & Mitchell (B&M) onshore processing and shipping facility began April 2025. Fieldwork for both the Safety Audit Team and third-party Electrical contractor concluded in October 2025.

The objective of each Safety and Oil Spill Prevention Audit is to ensure that oil and gas facilities on State leases are operated in a safe and environmentally sound manner, comply with state and federal regulations, and meet the Best Achievable Protection (BAP) requirement of Public Resources Code (PRC) 8755. This audit followed the established procedures that have been used by the California State Lands Commission (Commission) for many years. The applicable regulations and standards commonly used are provided in Appendix C. Audit findings are based on and reference these criteria.

Company Background

CRC is an oil and natural gas exploration and production company with operating properties exclusively in the state of California. CRC explores for, produces, gathers, processes, and markets crude oil, natural gas, and natural gas liquids in each of California's four major oil and gas basins: San Joaquin, Los Angeles, Ventura, and Sacramento. CRC carries out the day-to-day operations of the LBU for the State of California and the City of Long Beach.

Facility Description

CRC LBU is engaged in drilling and production operations of oil and gas from four man-made islands in Long Beach Harbor, as well as onshore well areas, production facilities, and support facilities. The onshore facilities within the Pier J area of the Port of Long Beach include well areas, a tank farm, and a processing facility. After processing at Pier J, the sweetened gas travels to the B&M gas processing facility where it is further dehydrated and processed to meet sales specifications. A refrigeration process is used to dehydrate the gas, removing water vapor and hydrocarbon condensates from the gas stream. Recovered hydrocarbon condensates are injected into the oil shipping line. The B&M facility also meters the oil sold and certifies the custody transfers of the crude oil to the individual shipping companies via pipelines to a customer, typically a refinery. Much of the gas is normally sent to the nearby power plant to generate power directly for the local electric utility grid.

Safety Audit Results

The Safety and Oil Spill Prevention Audit found the LBU – B&M Facility substantially comply with applicable safety and regulatory requirements and that an adequate level of safety and environmental protection has been achieved for facility activities. The established safety culture also ensures the protection of workers, the public, and the environment.

The condition of the facility was found to be in an acceptable state of repair, clean, and well organized. CRC appears to have well-established safety policies, health, and environmental programs. A consistent safety and environmental culture has developed from these programs. Employees are thoroughly trained in their job, which ensures that they perform tasks effectively, efficiently, and safely. They are encouraged to participate and further enhance overall reliability, job performance, and promote teamwork to reach organizational safety goals and reduce workplace hazards. Personnel are knowledgeable and provided valuable assistance to the Commission Mineral Resources Management Division (MRMD) staff during the course of the Safety Audit.

Safety systems and equipment remain fit for service. However, several pressure vessels are past due for scheduled internal and external inspections recommended by the American Petroleum Institute (API). Without inspection and condition assessment verification protocols, the equipment or system may not meet the intended requirements under operating conditions. Risk reduction and environmental compliance can only be ensured through scheduled inspections, testing, and implementation of preventive maintenance (PM) practices.

Firefighting, life safety, and spill response equipment meet NFPA and regulatory requirements. Fire extinguishers are regularly serviced, maintained and tested. Fire extinguishers are mounted, located, and identified so that employees can make use of them when needed. In addition, employees are required to take an online fire extinguisher refresher course yearly and must achieve a passing score.

Corporate safety programs are in place and fully implemented. The facility process control and safety shutdown systems are designed, installed, and maintained according to applicable codes and standards. Employees are appropriately trained in operating procedures, safe work practices, and the use, care, and limitations of all required Personal Protective Equipment (PPE).

Action items from the audit are categorized into three subject areas: equipment function and integrity (EFI), electrical (ELC), and safety management programs (SMP). Each action item is assigned a priority ranking from one to three: priority one action items pose a high or immediate risk to personnel, the facility, or the environment and must be resolved within 30 days of this report; priority two action items pose a moderate risk potential and must be

resolved within 120 days; and priority three action items pose a low-risk potential and must be resolved within 180 days.

The MRMD Safety Audit Team identified 18 priority 2 and 101 priority 3 action items. The following chart displays the distribution of the action items by subject areas. This distribution is similar to other facilities in California where the items identified are typically related to process equipment, maintenance practices, and electrical systems. CRC continues to show a commitment to and demonstration of well-developed safety culture by resolving 29 action items prior to report issuance. It is noted that 39 of the remaining unresolved action items (43%) are low-risk priority 3 items stemming from outdated or inaccurate Piping and Instrumentation Drawings (P&IDs).

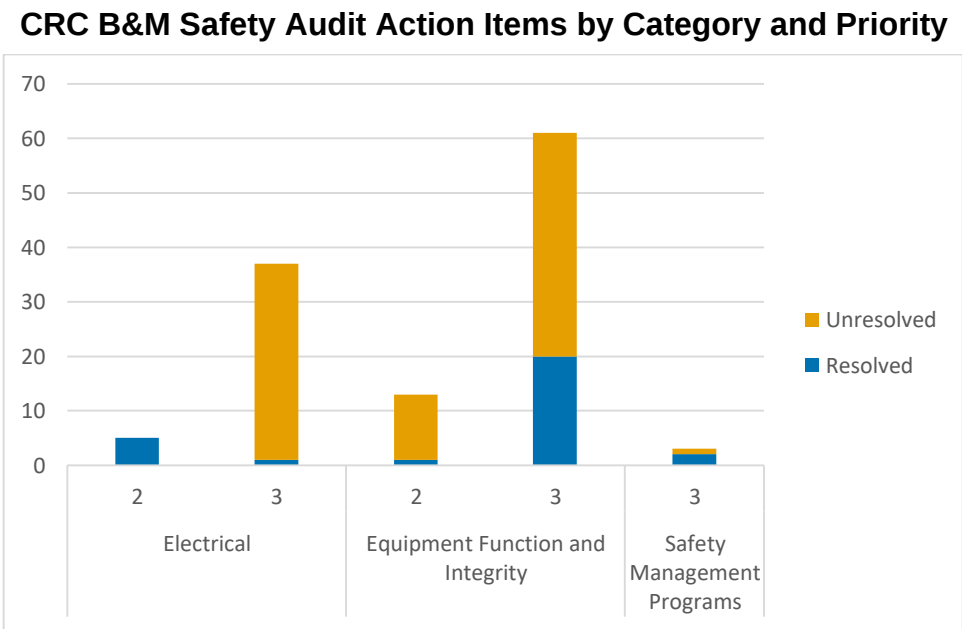


Figure 1

Introduction

California Resources
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INTRODUCTION

1.1 Safety Audit Background

The California State Lands Commission (Commission) Mineral Resources Management Division (MRMD) conducts safety and oil spill prevention audits of operators and/or contractors for lands in which the State has an interest. Commission sponsored safety audits ensure oil and gas production facilities on State leases or granted lands are operated in a safe and environmentally sound manner and comply with Federal, State, and Local codes or permits, as well as industry standards and practices. Commission staff are tasked with oil spill prevention in California's ocean and tidelands, prevention of waste, conservation of natural resources, and ensuring that safety and health standards are being met. Public Resources Code (PRC) 6103, 6108, 6216, 6301, 6873(d), 8755, and 8757 provide authority for Commission regulations and the existing inspection of the Safety Audit program.

In 1990, the California Legislature enacted the Lempert-Keene-Seastrand Oil Spill Prevention and Response Act (California Government Code 8670.1). The Act covers all aspects of marine facility oil spill prevention and response in California. Under the legislation, marine facilities must provide the Best Achievable Protection (BAP) of the coast and marine waters.

Frequent monitoring and inspections by MRMD staff of onshore and offshore oil and gas drilling and production facilities ensure that BAP is in place to safeguard the public and environment. The MRMD Safety Audit Program, in conjunction with the monthly inspection program, helps prevent oil spills and other accidents with on-site inspection and verification activities. The Safety Audit Program also aids prevention through design review and assessment of facility producing, processing, and safety systems, maintenance condition, operating procedures, emergency plans, training and certification programs, human factors, and other aspects of safety management.

During a safety and oil spill prevention audit, MRMD team members systematically review and inspect the operating organization's facilities and safety management programs, identify action items to be addressed, and provide feedback for improvement in preparation of a formal written report. Their areas of emphasis include:

- Equipment Functionality and Integrity (EFI)
- Electrical (ELC)
- Safety Management Programs (SMP)
- Human Factors (HF)

Appropriate company contacts and resources are identified prior to the start of the audit. Progress reports are communicated to MRMD management personnel and the company throughout the safety audit process and an “action item matrix” is developed to categorize and track audit findings. The matrix identifies deficiencies and contains recommended corrective actions and a priority ranking for the specified corrective actions. A graph and table are generated showing the breakdown of the facility’s identified action items by area of emphasis.

Draft copies of the report and the action item matrix are provided to the company during the safety audit. The final audit report is presented to company management formally, which affords the opportunity to discuss the findings, and the corrective actions proposed. Throughout the clearance phase of the audit, the MRMD team continues to communicate with the company in resolving the action items and tracks the progress of the proposed corrective actions.

This program could not be successfully undertaken without the cooperation and support of the operating company. The Safety Audit benefits both the company and the State by reducing workplace hazards, environmental accidents, property damage, and oil spills. Previous experience shows safety assessments help increase operating effectiveness, efficiency, and lower operating costs.

1.2 Facility Background

The California Resources Corporation (CRC) Long Beach Unit (LBU) is located within the Wilmington Oil Field in California, which is the third largest field in the contiguous United States with ultimate recovery estimated at three billion barrels of oil. It encompasses both tidelands (lands granted to the City of Long Beach by the State), uplands, and offshore areas leased by the State, and has produced over two and one-half billion barrels of oil through primary production and secondary water flooding.

Operations began in the mid-1960s from onshore areas within the Harbor District while the four landscaped oil islands were being constructed. The oil-producing formations in the Wilmington Field are at or below hydrostatic pressure, and the wells require artificial (mechanical) lift to produce. The field has been produced under waterflood since the 1960s to enhance recovery and to control subsidence; this has resulted in high water cuts for the current production. Oil is mostly produced from intervals ranging in vertical depths from 2,000 feet to 8,500 feet.

Legislation enacted in 1964 allowed the City of Long Beach to contract out the operation of the eastern offshore portion of the field. Four man-made islands were built and named after astronauts that lost their lives during the early years of the U.S. space exploration (Grissom, White, Chaffee, and Freeman). The original consortium of operators: Texaco, Humble, Union, Mobil and Shell formed the THUMS Long Beach Company to serve as contractor for the City

of Long Beach. THUMS constructed the islands and expanded Pier J adjacent to the Long Beach Harbor, forming the LBU. Occidental Oil and Gas Holding Corporation acquired THUMS from ARCO in 2000 creating Oxy Long Beach, Inc. California Resources Corporation was separated in June 2014 from parent company Occidental Petroleum and continues to be the agent for the field contractor operating the LBU on behalf of the State of California and the City of Long Beach.

1.3 Facility Description

CRC LBU is engaged in drilling and production operations of oil and gas from four man-made islands in Long Beach Harbor, as well as onshore well areas, production facilities, and support facilities. The onshore facilities that are part of the LBU located within Pier J area of the Port of Long Beach include well areas at sites J-1, J-3, J-4, and J-5, as well as the J-6 tank farm and J-2 processing. The LBU also includes the Broadway and Mitchell (B&M) processing and shipping facilities.

Wells at the LBU employ downhole electric submersible pumps (ESP) to produce crude oil. The wells are grouped in multi-well cellars at each island and other well sites. Produced oil, water, and associated natural gas are processed through Free Water Knockouts (FWKOs) at the island facilities, that provide initial separation of the produced fluid and gas. Produced water from the FWKOs is treated on site and is normally injected back into the formation. The oil emulsion and the gas streams are then sent through subsea pipelines and onshore gathering lines to the J-2 processing facility.

The J-2 processing facility further separates the produced emulsion into gas, water, and oil components, while removing entrained solids. The J-2 facility works in concert with the nearby J-6 tank farm which can hold some production volume during processing and stores the crude oil that is ready for sale and shipping.

The gas from the islands and onshore gas production is routed to the hydrogen sulfide (H₂S) absorption unit at the J-2 facility. The sweetened gas then travels to the B&M gas processing facility where it is further dehydrated and processed to meet sales specifications. A refrigeration process is used to dehydrate the gas, removing water vapor and hydrocarbon condensates from the gas stream. Recovered hydrocarbon condensates are injected into the oil shipping line. The B&M facility also measures the volumes of oil sold using highly-accurate Lease Automatic Custody Transfer (LACT) meters and certifies the custody transfers of the crude oil to the individual shipping companies via pipelines to buyers, typically pipeline companies or refineries. Natural gas is normally sent to the nearby power plant to generate power directly for the local electric utility grid.

Facility Condition Audit

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2.0 FACILITY CONDITION AUDIT

2.1 Goals and Methodology

The goal of the facility condition portion of the audit was to evaluate the current equipment maintenance and integrity of California Resources Corporation (CRC) Long Beach Unit (LBU), specifically the Broadway & Mitchell (B&M) onshore processing and shipping facility. The on-site inspection involved a systematic evaluation of the different systems, equipment, and facilities using various checklists and methods that the team has developed over years of auditing. A variety of codes and standards apply. Initial tasks to accomplish this goal included field verifications of the key drawings/plans, overall condition inspection and evaluation, review of system and equipment maintenance histories, evaluation of key systems and equipment, technical review of safety systems design, and verification of compliance with applicable state regulations and industry codes, standards, and recommended practices. The layout of the audit report generally follows a “system by system” method that includes a description and assessment of the facility with any significant observations. The report addresses the safety of personnel as well as facility and process safety. The assessments of both areas of safety are important when identifying an organization’s current level of safety development. The power plant was not included in the scope of this audit.

2.2 General Facility Conditions

2.2 Facility Roads Condition: No items of interest were identified during this audit. Roads are maintained in an acceptable condition to enable ready access to maintenance, surveillance, and emergency vehicles and equipment.

2.2.1 General Cleanliness/Vegetation Control: Facility work areas were clean, orderly, and free of waste materials (e.g., refuse, oilfield wastes) and fire hazards. There was an adequate supply of clearly marked refuse containers throughout the facility, and all refuse appeared to be well controlled. Employee facilities consist of a restroom located within the Control Office, used predominantly by CRC personnel, as well as sanitation facilities for contractors and visitors. The Porta-Potty and hand washing station on location are clean, regularly serviced, and well maintained.

CRC’s good housekeeping policies provide an organized, uncluttered environment and reduce hazards. Good housekeeping practices require attention to details, such as the layout of the worksite or facility, identification and marking of physical hazards, ensuring the adequate number of storage facilities, and routine maintenance. The benefits of good housekeeping affect not only workers' safety but also their health and productivity. Improvements in worker health and productivity, in turn, lead to lower operating costs thereby providing benefits to both the workers and the employer. It is also the foundation for accident and fire prevention.

CRC's housekeeping strategy is more than a one-time initiative; it encourages constant monitoring and auditing. Regular walkthrough inspections are conducted, hazards are reported, and employees are trained to help sustain housekeeping. Goals and expectations are set and audited.

To help prevent slip, trip and fall incidents, CRC uses the following employee guidance and work practices:

- Report and clean up spills and leaks.
- Keep walkways and exits clear of items.
- Warning signs to identify hazards.
- Drip pans and guards.

2.2.2 Stairs, Walkways, Gratings, & Ladders: Stairs, walkways, gratings, and ladders throughout the facility appeared to be of a safe design and construction. Safeguards were in place wherever there was a need to transition between levels and for routine access to equipment. The aisles, passageways, stairs, and gratings had sufficient safe clearances and were clear with no obstructions across or in the aisles to create a hazard. Fixed metal ladders and appurtenances are painted to resist corrosion and necessary work equipment appeared to be in good working order. One Priority 3 action item was generated due to tripping hazards observed on some surfaces. This includes holes present in the sump located in the northwest corner and deteriorating wooden beams which have created holes on a concrete pad (*Action Item EFI 2.2.2.01*).

2.2.3 Exits, Emergency Egress, & Escape: Emergency exits, escape routes, and gathering points are clearly posted and easily accessible. Evacuation routes are explained during initial worker orientation and safety meetings, as well as being reviewed as part of the work permit system. They are clearly identified with signs posted throughout the facility. Due to the design, size, and open arrangement of the remaining equipment inside the facility, there were no areas of concern regarding access and egress.

2.2.4 Labeling, Color Coding, Placards, & Signs: The design, application, and use of signs and symbols within the facility define specific workplace hazards. CRC adheres to Occupational Safety and Health Administration (OSHA) and American National Standards Institute (ANSI) recommendations regarding signage. All employees receive instruction on what the signs mean and what, if any, special precautions are necessary to perform their task safely. Workplace hazards (e.g., slip & trip) are marked with yellow, and fire safety equipment is marked with red.

Required signs, including owner/operator contact information, were posted at the entrance and where needed within each facility. A "Piping Service Identification" sign was observed near the entrance of the facility; however, the facility piping does not follow the

posted identification color scheme (*Action Item EFI 2.2.4.10*). Generally, warning signs were posted properly to identify known safety hazards, were clearly visible and identified safety hazards. However, there were some locations where overhead clearance caution signage should be provided (*Action Item EFI 2.2.4.01*), ear protection signs could be refreshed (*Action Item EFI 2.2.4.02*), and the bonding required caution sign should be replaced for V-650 (*Action Item EFI 2.2.4.03*).

Tanks and vessels within the facility were clearly identified as confined spaces with warning placards posted at manways to warn personnel of potential hazards. One confined space sign was observed missing for the sump near VE-8009 (*Action Item EFI 2.2.4.04*). Generally, field equipment was observed to be appropriately labeled and manufacturers data plates were present, however there are some pieces that can be replaced and/or refreshed for legibility or consistency (*Action Item EFI 2.2.4.05 - 2.2.4.08*).

National Fire Protection Association (NFPA) 704 hazard identification labeling (hazard diamonds) were generally visible on all tanks, vessels, buildings, and chemical storage totes; however, replacements are required in some areas (*Action Item EFI 2.2.4.09*). The posting of hazard diamonds is an indication of good facility hazard communication and conformance with good oilfield practice.

2.2.5 Security: Physical and operational security measures are in place to prevent unauthorized entry into the B&M facility. The facility is manned twenty-four hours a day, seven days a week with one operator present at all times. Fencing, facility lighting, locked doors, and electronically controlled gates at access locations are used as a deterrent to unauthorized entry and vandalism. Facility personnel also provide additional monitoring with normal operational surveillance.

2.2.6 Hazardous Material Handling & Storage: Flammable and combustible liquids were found properly stored and documentation readily available, corresponding to Cal/OSHA and NFPA 30 regulations. The bulk chemical totes appeared structurally sound and had adequate containment in the event of a leak. There were some missing and/or faded chemical labels for various chemical storage tanks which should be replaced (*Action Item EFI 2.2.6.01*). Safety Data Sheets (SDS) containing information on all chemicals used in the workplace are readily available and can be found inside the Production Office.

Compressed gas cylinders were secured and legibly marked identifying the gas content. Empty and unused cylinders had closed valves with protective caps in place. Cylinders were adequately secured and stored in places where they would not be knocked over or damaged because of contact.

2.3 Field Verification of Plans

2.3.1 Process Flow Diagrams (PFDs) & Plot Plans: The PFDs are part of the process safety design information for the facility and indicate the general flow of plant processes and equipment. Plot Plans illustrate the location of pieces of equipment, including safety equipment, and where they are relative to other pieces of equipment. Some minor changes to the Process Flow Diagrams and the Plot Plans are needed to reflect current equipment and placement (*Action Items EFI 2.3.1.01 & 2.3.1.02*).

2.3.2 Piping & Instrumentation Diagrams (P&IDs): Field Verification of the P&IDs showed that they were reasonably accurate; however, minor updating is required. The discrepancies in the P&IDs included piping identification errors, missing equipment, and out of service or removed equipment (*Action Items EFI 2.3.2.01-2.3.2.35*).

2.3.3 Fire Protection Plot Plan: The fire protection drawings were found to be mostly accurate and up to date with only minor updates or corrections needed to reflect the accurate location of various fire protection equipment (*Action Items EFI 2.3.3.01-2.3.3.03*).

2.4 Condition and Integrity of Major Systems

2.4.1 Pumps and Piping: The mechanical integrity and maintenance of the pumps and piping were evaluated by external visual inspections in conjunction with P&ID verification. The visual inspection and evaluation work included the external condition of the pumps and piping, coating, signs of misalignment, temporary repairs, vibration and leakage. The evaluation also included the condition of pipe hangers and supports as well as any field modifications or temporary repairs not recorded on the piping drawings. The evaluation considered other key information such as material selection, piping design, and maintenance practices.

CRC uses a combination of ongoing routine and risk-based piping inspections to achieve a desired level of facility safety, environmental protection, and unscheduled downtime. Inspection frequencies are set up according to regulatory requirements and established guidelines (e.g., American Petroleum Institute (API) 570 and Department of Transportation (DOT) pipeline inspections). Results from thickness measurements, inspections, repairs, and other tests are readily available and recorded in a computer-based maintenance system (Maximo). This maintenance management system stores and generates maintenance activities as well as saving inspection data. The maximum allowable operating pressure of each pipeline is established based on these results and CRC LBU's policy is not to operate a pipeline that has greater than 50% wall loss. The pumps and piping fitness throughout the facility were found to be in generally good condition with the exception of the following Priority 3 action items that were generated as a result. It was noted that various piping supports and brackets were missing throughout the facility and that wood was used as support in places that appeared to be permanent installations (*Action Item EFI 2.4.1.01*). Throughout the facility,

bolts without complete thread engagement were observed on flanged joints (*Action Item EFI 2.4.1.02*). Lastly, various mixing pumps have been disconnected and have open covers, missing bolts, and exposed wiring (*Action Item EFI 2.4.1.03, 2.4.1.04*).

2.4.2 Tanks: The tanks at the facility appear to be in good condition and have been inspected within API Standard 653 guidelines. Facility tanks are subject to CRC's written inspection and maintenance plan which follows API Recommended Practices (RPs) and standards. The maintenance strategy also conforms to applicable State regulations and uses appropriate work practices and procedures. Routine external/internal maintenance inspections occur in cycles. Tank documentation includes inspections, repairs, alterations, and reconstruction records. In addition, tank shell ultrasonic thickness (UT) data showing locations and results are completed as part of the inspection process. This inspection method searches for flaws and service induced damage as part of determining the suitability of the tank for intended service. Tank exterior coatings, piping, valves, walls, roofs, anchor bolts, and labeling appeared to be in good condition with no evidence of recent damage or active leaks. A comprehensive review of the tank inspection records was performed to assess the current maintenance condition. It was observed during the field work that TK-8000 is Out of Service and therefore should be tagged OOS, disconnected, blinded, air gapped, manways opened, and isolated from active equipment/systems or removed (*Action Item EFI 2.4.2.01*).

2.4.3 Pressure Vessels: B&M facility has a variety of pressure vessels used for processing. These pressure vessels are maintained following a program of external and internal examination for compliance with applicable regulations, recommended practices (e.g., API 510), and recordkeeping. These pressure vessels are built according to American Society of Mechanical Engineers (ASME) Codes and have appropriate controls and safety devices. CRC has tailored inspection cycles to match the safety risks posed by particular classes of pressure vessels. CRC uses a maintenance management program called CREDO to determine vessel inspection frequencies. CREDO uses vessel wall thickness, corrosion allowance, and minimum thicknesses (t-mins), as well as operating temperature and pressures, to determine the inspection frequency. External vessel inspections are completed within 5-year intervals, while internal inspections and/or thickness measurements are completed within ten-year intervals using non-destructive examination techniques per API 510 Pressure Vessel Inspection Code.

Analysis of pressure vessel inspection records determined that multiple pressure vessels had not had either an external or internal inspection within the allowable time intervals (*Action Item EFI 2.4.3.01-2.4.3.12*).

A visual external inspection of the pressure vessels was performed to assess the general condition and found damaged confined space expanded mesh screens on a couple pressure vessels (*Action Item EFI 2.4.3.13*) and various valves frozen with ice, prohibiting the ability to freely open and close (*Action Item EFI 2.4.3.14*).

2.4.4 Pressure Safety Valves: The primary purpose of the pressure relief system is to ensure protection of facility personnel and equipment from overpressure conditions that may happen during process upsets, equipment failure and external fires. The relief system serves the major process vessels and components while other relief devices may be located on smaller ancillary components. The relief system components were evaluated for installation, design, maintenance, functionality, compliance with applicable regulations and recommended standards, as well as recordkeeping.

A visual inspection of the system determined that all piping laterals and headers are arranged so that the outlet from each PSV does not form a liquid trap.

Isolation valves are installed on the inlet lines to PSVs and on the outlet lines for ease of maintenance. They are used to isolate a relief valve for inspection, servicing, and repair while the facility is operating. Due to the critical nature of this safety system, these valves are locked or car sealed in the open position during normal operations. The inspection generally found that these valves were properly car-sealed and/or locked open, however some replacements are required (*Action Item EFI 2.4.4.01*). PSVs are tested and serviced by an outside contractor. The inspection frequency is normally every six months regardless of the service of the relief valve. Service records were in order and no action items were identified.

2.4.5 ESP, Pump Units, Wellhead Equipment & Well Safety Systems: B&M Facility processes produced gas from the Islands and meters the oil sold. The facility has no production or injection wells on location.

2.4.6 Firefighting Detection Systems: The facility is equipped with protective flame detectors in sensitive areas as shown on drawing E-10358. There is adequate coverage with no action items identified.

2.4.7 Fire Protection Equipment: Handheld portable extinguishers are distributed throughout the B&M facility. Equipment inspections occur monthly by a contractor and equipment appears in good condition. CRC uses an approved contractor for annual fire extinguisher service.

Long Beach Fire Department Station 20 is located across Pier D Street from B&M's rear gate. There are four fire hydrants between 115 feet and 215 feet of the B&M property line. The closest hydrant is on the southeast edge of the property. The other three hydrants are located to the west of the property.

2.4.8 Emergency Shutdown Device (ESD): There are seven ESD switch boxes located throughout the facility. Four of the switches shut down the entire facility; the other three shut down the gas side of the facility only.

2.4.9 Safety & Personal Protective Equipment (PPE): CRC has a written workplace safety program for identifying, evaluating, analyzing, and controlling workplace safety and health hazards. This program has systematic policies, procedures, and practices that are fundamental to creating and maintaining a safe and healthy working environment. CRC prioritizes the importance of preventing occupational injury and illness over production. One Priority 2 action item was observed during the field work which included various pumps lacking appropriate guarding to prevent contact of rotating parts (*Action Item EFI 2.4.9.01*). The hazard was communicated to CRC personnel and corrected immediately.

CRC regularly assesses the workplace to determine if hazards are present that require the use of PPE when engineering and administrative controls are not feasible or effective in reducing these exposures to acceptable levels. Hazards are communicated to the employees, appropriate PPE is selected, and workers are trained in its use. Employees were observed to be using appropriate PPE as required by company policy or where hazards are known to exist. PPE commonly used include hard hats, steel-toed boots, fire resistant clothing (FRC), hearing protection, safety glasses, and other specialty items like face shields, rubber gloves, aprons, and fall protection as needed.

The inspection of the Portable Eyewash stations and fixed Safety Showers had acceptable fluid levels and were within line of sight or standard distance from the chemical totes. However, some emergency showers throughout the facility should be made highly visible (*Action Item EFI 2.4.9.02*).

2.4.10 Instrumentation, Alarm, & Paging: Major equipment, process controls, and process control alarms are graphically displayed on a Human Machine Interface (HMI). Electronic gas sensors are spaced throughout the facility to detect combustible gas at 10% of the lower explosive limit (LEL). Event logging (errors, alarms, and system messages) is performed by the process control and safety systems and can be printed on demand.

The facility instrumentation is tested, maintained, and calibrated on a regular schedule. Records are readily available, and the device history can be tracked through the maintenance database program. All local instrumentation (e.g., pressure gauges, temperature gauges, and recorders) appeared to be properly maintained and in good operating condition.

2.4.11 Auxiliary Generator / Prime Mover: The facility is not equipped with Auxiliary Generator.

2.4.12 Spill Containment: Spill containment appeared to be adequate throughout the B&M facility. Initial spill response supplies such as sorbent pads and hand tools are available and located in containers throughout the facility. These supplies are inventoried and readily accessible by operating personnel in the event of a spill.

2.4.13 Spill Response: Oil spill response for B&M is outlined in CRC LBU's Oil Spill Contingency Plan (OSCP) dated July 2024. The plan satisfies both federal and state regulations. The response equipment that is located in the facility is checked monthly for condition and to satisfy the quantities specified by the response plan. All equipment and its storage appeared to be in good order during the safety audit.

2.4.14 Cranes & Slings: There are two cranes at the B&M facility; they are identified as a gantry style single girder with manual chain hoist and a column mounted jib crane with manual chain hoist. The cranes are inspected regularly by a third party and marked as such in the field. Additionally, CRC provided inspection reports for both cranes. The reports indicated that for each crane the "chain and pocket wheel [had] built up dirt and grease" in April 2025. The parts appeared to have been serviced since the time of inspection, based on a visual comparison between field conditions in August 2025 and pictures from the April 2025 inspection report.

2.5 Mechanical Integrity / Preventive Maintenance Program

This section provides a general overview of CRC's corporate philosophy and approach to implementing a successful reliability program. The evaluation of CRC LBU's maintenance activities also ensures mechanical equipment is operating to designed parameters and maintained in a manner appropriate for its intended application.

Maintenance activities are initiated, managed, and tracked utilizing Maximo. Operating personnel have the capability to access Maximo to generate a work order. These work orders can range from a simple filter change to major equipment repair. Maximo gives the CRC maintenance planner flexibility to schedule and record these activities based upon manufacturer's recommendations, operating history, and recognized and generally accepted good engineering practices. Operating personnel conduct preventive maintenance on all critical processes and operational equipment. Major pieces of process equipment (i.e. vessels, tanks, piping, and machinery) can be scheduled within the preventive maintenance program based on manufacturer's recommendations and operating history.

In addition, a computer-based risk management software package called CREDO is in use that allows facility engineers to view risk levels established for the various sections of piping and pressure vessels based on service and consequence of failure. When the risk for a particular section of piping or shell thickness of a pressure vessel reaches an unacceptable level, engineers can implement a corrective or mitigating action on the asset to lower the risk to an acceptable level.

2.6 Production Safety Systems

The audit team reviewed the automated safety systems at B&M. All process components, their installed safety alarms and shutdown features, detection and monitoring systems, other emergency support features, equipment, and their functions were reviewed. Study of these systems and devices through review of CRC's B&M Hazard and Operability process hazard analysis (PHA), P&IDs, and operating procedures provided an overall view of the design. B&M's safety systems and devices (as presented in these documents) were compared with the recommendations from API RP 14C – *Analysis, Design, Installation, and Testing of Safety Systems for Offshore Production Facilities*. This facility does not fall under the scope of API RP 14C; however, no deficiencies in the safety systems or devices were identified during this comparison.

CRC LBU has designed processes to minimize risk through the implementation of simpler process designs and by conducting PHAs early in the design process, revalidating regularly, and when managed changes occur. If this is not practical, then non-Safety Instrumented Systems layers of protection are applied to reduce risk to an acceptable level. CRC uses a hierarchy of health and safety controls (e.g., substitution/reduction, engineering controls, and administrative controls) when hazards cannot be eliminated or controlled through design.

B&M has an integrated safety control system. The automated control and safety systems were designed in line with PSM requirements and hazard mitigation techniques required by the Cal/OSHA PSM standard and work practices detailed by the American Institute of Chemical Engineers Center for Chemical Process Safety (AIChE CCPS). They feature an HMI with status information for the operator, process controls, and include a set of safety sensors and controls for the facility. These layers achieve appropriate safeguarding for the risks and hazards addressed, while providing opportunities for corrective action to minimize the consequences from operational upsets and other undesirable events. The automated control system provides for reliable and coordinated operation of the major processing equipment. An initial set of process control alarms and the capability for operator originated corrective actions act as the first level of safeguard within this automated control system. For critical deviations in pressure or level, a safety or emergency shutdown action typically provides the next level of protection. Relief valves and/or other mechanical devices provide physical protection to prevent rupture from overpressure or overflow.

The safety systems installed on pressure vessels and tanks focus on preventing releases, stopping the flow of hazardous chemicals to a leak if one occurs, and minimizing the effects of such releases. The majority of safety devices on the pressure vessels consist of alarms and pressure safety valves (PSVs). Process tanks and their control systems are designed with sufficient safety devices and redundancies to prevent and/or isolate any accidental release of flammable gas or liquid. An integrated detection and protection system

senses and activates appropriate high and low-level alarms. Mechanical devices such as level indicators and valves are incorporated into the design to provide an additional level of protection.

The basic process control system and safety instrumented systems at B&M function independently in line with International Society of Automation (ISA) and International Electrotechnical Commission (IEC) recommendations. This separation prevents common-mode failures between process control and safety systems and increases reliability of the safety systems functioning properly during hazardous events. Facility HMI systems are designed to allow operators to easily visualize and control operating parameters to optimize the overall function and production of the processes. Access to safety system program control code and parameters is limited to the automation team to prevent inadvertent changes and ensure desired function. Bypass switches for functional testing provide “no interruption” to the normal process operation. System safety integrity is maintained when a device is placed in bypass by procedures and the use of an alarm to indicate an active bypass.

An emergency shutdown switch for B&M is clearly indicated and easily accessible in the control room. The switch provides a means for personnel to initiate a facility shutdown when an abnormal condition is observed.

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Electrical System Audit

California Resources
Corporation
Long Beach Unit
Broadway & Mitchell
Facility

October 2025

3.0 ELECTRICAL SYSTEM AUDIT

3.1 Goals and Methodology

The primary goal of the Electrical Team (ELC) was to evaluate the electrical systems and operations of the California Resources Corporation (CRC) Long Beach Unit (LBU) onshore production and transportation facility at Broadway & Mitchell (B&M) to determine conformance with appropriate electrical Codes and industry standards.

References used in review of facilities include documents published by the American Petroleum Institute (API), National Fire Protection Association (NFPA), the State of California Electric Code (CEC). The ELC Team review comments are based on those publications, which primarily include API RP 500, API RP 540, CEC documents and industry standards. The drawings used in support of the audit were Electrical Single-lines, Area Classification Drawings, as-builts, and maintenance/testing data provided by CRC for the facility.

Specific tasks to accomplish this goal included a systematic process of field verification of electrical single-line diagrams, plan drawings, area classification drawings, and operation and maintenance practices. A comprehensive range of inspection checklists, code and standard compliance checklists, and review of electrical system design for conformance to codes and standards was utilized to complete the audit. This report includes a summary of the electrical systems included in the audit.

The ELC Matrix, Section 3.0, provides a detailed listing of the locations and items identified for correction. The matrix is organized in sections, and each segment is discussed below along with examples of typical items encountered.

3.2 Hazardous Area Electrical Classification Drawings (HAECD)

The API recommended practices and CEC requirements provide specific guidelines for the electrical classification of hazardous areas and installation practices for electrical equipment and materials within classified areas. The basis for observations and review comments for all hazardous areas are American Petroleum Institute (API) RP 500, California Electric Code (CEC) Articles 500, 501, and 504, and National Fire Protection Association (NFPA) 70E. The hazardous area electrical classification drawings are generally representative of the existing conditions and area class elements. However, the drawings for the Broadway & Mitchell (B&M) facility may need to be updated to include process and equipment additions and deletions made since the last revision on December 2022. Refer to the electrical matrix for specific areas that need to be re-evaluated for hazardous classification.

The purpose of a Hazardous Area Electrical Classification Drawing (HAECD) is to define the locations of boundaries and areas where specific electrical materials and installation

practices are required to manage risks associated with the explosive properties of flammable liquids, vapors, and other volatile materials. Installation and maintenance of electrical systems requires attention to the type of hazard and the level of the hazard to ensure compliance with CEC requirements. Hazardous Area Electrical Classification Drawings are required to include the information necessary for designers, electricians, and other personnel to perform work in and around classified areas. There have been equipment changes made at the onshore production facilities at Broadway & Mitchell (B&M) that necessitate an update of the Hazardous Area Electrical Classification Drawings.

Portable chemical tanks are used for treatment and injection and are located throughout the facilities. The locations of the tank installations are, by definition, permanent and they have pumps that operate continuously. Since many of the portable tanks contain flammable liquids, the lines, pumps, and fittings associated with the tanks are also a source of hazard and require classification of the areas affected.

Areas that contain walls, depressions, and barriers to natural ventilation where flammable liquids or vapors may be present require evaluation and identification of the appropriate area classification. All areas known to contain flammable liquids or vapors are required to be identified on a Hazardous Area Electrical Classification Drawing. The area classification plans require the addition of details to more clearly define and illustrate the facility area class boundaries, elevations, and extents.

General-purpose electrical enclosures (Load Centers, MCCs, control panels, etc.) are only suitable for use in unclassified areas. In general, electrical equipment installed in Classified areas were found to be explosionproof, NEMA 4, purged, or otherwise suitable for use in Classified areas. Purged enclosures must have purge systems monitored and equipped with an alarm when purge pressures drop below a minimum level.

Some junction box and conduit fitting covers are missing or not properly seated against box flanges to provide adequate seal in classified areas. Covers must be flange-face to flange-face or box if bolt-on type or five full threads engaged if screw-cover type. Conduits must be sealed at devices, enclosures, and area classification boundaries.

After updating and revising the Hazardous Area Electrical Classification boundaries as required by the matrix and as described in this report, additional equipment may be identified as unsuitable. Electrical equipment that is not suitable for installation in a classified area will need to be relocated, replaced with equipment that is suitable, purged, or non-permeable barriers will need to be installed. Enclosed and gasketed fittings are suitable for Division 2, but not Division 1. NEMA 3R enclosures are suitable for unclassified areas, but not Division 1 or Division 2. Where non-explosionproof enclosures with arc producing devices are located in Class I areas, they are required to be purged and pressurized per NFPA 496.

3.3 Electrical Power Distribution System, Normal Power

Electrical System Configuration: Electric utility service is supplied by Southern California Edison (SCE) to Broadway and Mitchell. The facility receives power at 12.47kV from SCE over a single power line and utilizes power at 4160V or 480V through a radial distribution system to supply plant loads.

3.3.1 Electrical Single-Line: The electrical single-line drawings provided by CRC were used for review of the LBU facilities electrical system. During the audit, sizes and rating of the equipment were recorded for comparison to existing drawings. The audit focused on 12.47kV, 480V, and 240V power distribution systems. CRC will need to add missing information and incorporate the corrected information into updated single-line drawing per each site matrix.

3.3.2 Electrical Service Capacity: The normal power system capacity appears to be adequate for present usage and loads based on observation of equipment connected for each site. Electrical system utility short circuit duty data was provided within the 2023 arc-flash report created by Mangan Inc. The data is suggested to be included on the single-line diagram. Utility short circuit duty should be verified every five years when the facility arc flash hazard assessment is updated as required by NFPA 70E.

A physical inspection of motor starters and circuit breakers revealed that, in general, overcurrent protection was appropriate. The application of overcurrent devices with respect to equipment rating is generally satisfactory.

3.3.3 Electrical System Design: Broadway & Mitchell (B&M) site receives power from SCE at 12.47kV. CRC-owned step-down transformers supply three-phase power at 4.16kV and 480V to the facility loads. Facility loads requiring a 208/120V supply are served by CRC owned transformers located near the loads.

Broadway & Mitchell (B&M) receives SCE power at 12.47kV at Distribution and Metering Switch Gear 1. Two main step down transformers T-1 and T-3 supply power to the 4.16kV switchgear 2 and 480V load center B2. The step down transformer windings are delta connected and grounded.

Reliability of the electric system is determined primarily by the availability of SCE to supply loads and the condition and operational readiness of the facility distribution system. A sound maintenance and inspection program, properly implemented, is key to assuring the highest level of reliability. Electrical preventative maintenance and repair has been integrated into the MAXIMO computer database where it is tracked.

Electrical systems shall be designed to minimize the risk of hazards to operating personnel. CEC Article 110.16 requires that arc flash hazard warnings be provided on electrical equipment to warn personnel of the potential electric arc flash hazards. NFPA 70E-

2024, Standard for Electrical Safety in the Workplace, provides guidance for labeling and selecting personal protective equipment (PPE). Arc flash hazard warnings and labeling is, in general, provided on all energized equipment at the LBU. It was confirmed with CRC that the studies for arc flash hazard are being updated every five years.

Circuit identification nameplates are missing, hard to read, or no longer applicable because equipment has been removed. This can cause confusion when operating or de-energizing equipment for maintenance. Several switches supplying equipment did not have load identification and need to have identification nameplates added or updated. Refer to the electrical matrix for specific locations that require updating.

3.4 Electrical Power Equipment Condition and Functionality

3.4.1 Equipment Condition: Given the harsh environmental conditions near the seashore, the overall condition of the electrical equipment can be rated as fair. The rating condition of fair can be attributed to age, result of exposure to the elements, collateral damage during site activities, and the ongoing need for maintenance in this type of aged facility. Broken and missing enclosure covers, broken supports, rusted enclosures, deteriorated weatherproof gaskets, and missing bolts all indicate the need for continual attention to basic maintenance housekeeping activities (*Action Item ELC 3.4.1.05, 3.4.1.06, 3.4.1.08, 3.4.1.09, 3.4.1.15*).

CEC Article 110.13, Mounting Electrical Equipment, requires all electrical equipment to be firmly secured to the surface on which it is supported. CEC Article 300.11, Securing and Supporting, requires all electrical raceways, cable assemblies, boxes, cabinets and fittings to be secured or fastened in place. Additional mounting, support, and securing requirements are also provided in the CEC for individual types of installations and conditions. Securing and supporting of electrical equipment, cables, and materials needs to be consistently addressed and managed throughout the island and onshore facilities.

Refer to the Electrical Matrix for a list of physical condition issues such as broken/missing covers and supports, corrosion and deteriorated gaskets, open or partially assembled fittings, and degraded labels. These conditions undermine environmental and classified-area integrity (ingress paths) and complicate operations. Corrective actions: replace/secure damaged supports and covers, renew gaskets, close/replace compromised fittings and conduits, and re-label with durable, legible nameplates and current arc-flash stickers.

3.4.2 Safety Procedures: Safety Standards in the Operations Manual are provided to cover the electrical equipment lockout/tagout/blockout program and reflect NFPA 70E requirements. CRC has implemented a hazards identification program that requires personnel to complete a Job safety Analysis (JSA) prior to performing any work on equipment or facilities. The JSA includes hazards identification, PPE, and other measures to mitigate hazards. All JSAs must be closed out at the completion of the tasks.

3.4.3 Equipment Maintenance Practices: Equipment maintenance practices are clearly defined within CRC's Electrical Integrity and Quality Assurance Program and implement requirements based on the NFPA 70B code and API standards. The Electrical Integrity program clearly communicates inspection and testing parameters and frequency for electrical systems. The program appears to be adhered to and kept up to date.

Maintenance and testing documentation was provided by CRC as a part of the Audit. Regular inspections and work orders are scheduled, completed, and documented appropriately and proactively. Routine maintenance and testing shutdown took place for the B&M site during the week of 10/20/25.

3.5 Grounding & Bonding

CEC Articles 250 and 501 provide the requirements for power system grounding and bonding in oil production facilities. Significant portions of the requirements for grounding are established to prevent or reduce the possibility of injury to personnel from shock. The grounding system also contributes to a reduction of equipment damage either from induced voltages or during fault conditions. The three types of grounding required at the facility are power system circuit grounding, equipment equipotential grounding, and static control grounding.

CEC Article 501.16, Bonding in Class I Areas, states that all non-current carrying metal parts and enclosures associated with electrical components shall be connected together, bonded, and be continuous between the Class I area equipment and the supply system ground. That is, ground circuit bonding shall be continuous from the load all the way back to the power transformer grounding electrode system. The best way to achieve ground circuit continuity is to include properly sized (CEC Article 250) equipment grounding conductors with each set of power conductors from the source of power to the load. Equipment bonding conductors to major equipment, such as transformers, switchgear, and the like, were installed and appeared adequate.

CEC Article 501.16(b) requires that all liquid-tight conduit used in hazardous areas be supplemented with either an internal or external ground bonding jumper. A spot check of the facility found external grounds on the liquid-tight conduits with minor maintenance required.

The electrical matrix items (missing/detached/insecure bonds; unraveled ground strands; "conduit only partially bonded") indicate discontinuities between equipment and the source grounding electrode system, and gaps in liquid-tight bonding. Restore bonding/grounding continuity via bonding jumpers, replace damaged ground conductors, and add necessary external bonding jumpers on liquid-tight conduit in classified areas as described in the matrix.

3.6 Emergency Electrical Power

3.6.1 System Configuration: Broadway & Mitchell (B&M) has a standby generator to power a 125VDC panel and a 20kVA UPS. The control building at B&M includes manual transfer switch provisions to allow connection of a portable temporary generator to supply critical control building loads.

3.6.2 Equipment and Component Ratings: Individual battery backup power is provided within the Control Building telecom and telecommunications system enclosures. The capacity of the UPS system is adequate based on the load.

3.7 Electric Fire Pumps

No fire pump is provided for the Broadway & Mitchell (B&M) facility. Fire protection is supplied by the local fire department.

3.8 Process Instrumentation

Process control is managed on a daily basis by operating personnel. Communications regarding process operating parameters is managed through direct communications and cellular phone. The microwave data link is supervised by the IT department and maintenance is performed by CRC electricians.

The process control system uses a combination of pneumatic, hydraulic, and electrical instruments and controls. It includes the use of computers, programmable logic controllers (PLC), and relay logic to control and interface with valves, solenoids, and pump controllers. Alarms are produced from the level, temperature, pressure, and flow sensors advising operators of process conditions.

Process monitoring is accomplished through the use of control terminal screen displays located in the Main Control Room at Broadway & Mitchell. Additionally, operators will tour the facility to conduct daily monitoring and verification of local instrument readings and record them on a regular basis.

Process alarms are either discrete or result in a single point alarm. Annunciation at the Main Control Room or with a local alarm and beacon or a combination of local and Control Room alarms will result from a process alarm. Single point alarms annunciated in the Control Room require an operator to go to the source of the alarm to determine the actual cause. Local annunciators or displays are then used to troubleshoot the cause of a general alarm or shutdown.

3.9 Lighting Systems

Facility area and work lights require normal utility power. Area and work lights are installed throughout the Broadway & Mitchell facility. Light sources are being converted from High Pressure Sodium and Metal Halide to LED. Illumination levels should comply with API RP 540. Lighting fixtures were spot checked and appear to be maintained and in good working condition. Emergency lighting was tested along with other emergency systems by Vallen Safety services in February 2025 and no concerns were identified.

3.10 Special Systems

The ELC Team review comments for special systems are based on API RP 14F, API RP 540, and CEC documents.

3.10.1 Safety Control Systems: Safety control systems are required to be a combination of devices arranged to safely affect facility shutdown. Electrical safety control systems are normally operated energized and fail-safe. Failure of external power to a safety control circuit requires an audible or visual alarm to be initiated or operation of equipment in a fail-safe condition.

Emergency shutdown (ESD) stations are installed at various locations throughout the B&M facility. ESD stations are located on equipment plans and are periodically tested during normal maintenance procedures. As-built documents of the ESD system were provided and appear to be up-to-date.

3.10.2 Gas Detection Systems: Combustible gas detection systems, Lower Explosive Limit (LEL) and Hydrogen Sulfide (H₂S) type, are employed to detect combustible gas leaks in equipment and piping, to warn personnel of explosive and toxic concentrations and to initiate remedial action. The Broadway & Mitchell facility require all personnel to wear a personal H₂S detector and to carry a 4-way detector while working on site. (33) General monitor gas detectors have been implemented throughout the B&M Facility, are tested regularly, and appear to be in good working condition. The gas detection system is integral with the flame detection system. The system uses general strobe lights and sirens to announce an alarm when activated.

3.10.3 Fire Detection Systems: Fire detection and smoke detection is employed to detect and warn personnel of fire and smoke conditions and to initiate remedial action. (5) General Monitors Flame detectors have been implemented throughout the B&M Facility, are tested regularly, and appear to be in good working condition. The system uses general strobe lights and sirens to announce an alarm when activated.

3.10.4 Aids to Navigation: Not applicable.

3.10.5 Communication: Communications systems are established to provide reliable communication during normal and emergency operations. Systems used for emergency communication have battery-operated supplies good for at least four-hours continuous operation as required by API RP 14F. UPS systems are installed on the Islands that provide power for communications during a power outage. Landlines, microwave, wireless radio, and cellular phones are available and are used for communication between facilities.

3.10.6 General Alarms: General alarms shall be audible in all parts of the facility to notify personnel to abandon the facility or respond to an emergency. Red lights can be used in conjunction with the audible alarms. All general alarm sounding devices shall be identified by a sign at each device in red letters at least 1-inch high describing the required personnel response. It is recommended the central paging system be used to supplement instruction of a general alarm.

3.10.7 Cathodic Protection: Cathodic protection systems are installed at the Broadway & Mitchell facility. It was noted during assessments that many of the cathodic protection rectifier panels were painted over and that electrodes were not being reinstalled on piping, tanks, or vessels after being repaired or replaced. All cathodic protection system equipment required to protect vessels, tanks, and pipelines should be evaluated for proper operation and repaired as necessary.

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Safety Management Programs

California Resources
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4.0 SAFETY MANAGEMENT PROGRAMS

4.1 Goals and Methodology

The goal of this section of the audit was to verify that CRC has required programs, plans, and manuals in place and that the company uses a safety management approach to manage hazards and thereby reduce the frequency and severity of undesirable events. CRC's safety management programs are composed of organizational and operational procedures, design management, audit programs, and other methods defined by OSHA and the EPA. Operating Manuals, emergency and spill response plans, training and qualification programs, and other key elements were reviewed for accuracy and content. Additionally, Staff reviewed programs specific to CRC addressed in their Health, Safety, and Environmental Manual.

4.2 Operations Manual

CRC has a system in place for determining what procedures or processes need to be documented. Individuals knowledgeable with the process and its hazards write the Standard Operating Procedures (SOPs). These individuals are also familiar with the subject matter and typically have performed the work and operated the process. The SOPs are written in a concise, systematic, easy-to-read format with sufficient detail so that trainees with limited experience or knowledge of the procedure can successfully carry out the task with minimal supervision.

The SOPs are maintained and available via the company intranet system to all CRC personnel with hard copy versions located in the operating facility control room. A comprehensive review of the SOPs is performed to determine that pertinent operating information is readily available within the different manuals. The SOPs are reviewed annually, with hard copies and/or electronic files being updated by authorized CRC personnel to ensure that the policies and procedures remain current. Operating procedures for processes that are no longer followed are removed from the intranet and manual. The review of operating procedures uncovered limited references to missing, inaccurate, inconsistent, and out-of-date information. (*SMP – 4.2.01*)

4.3 Spill Response Plans

CRC's Oil Spill Contingency Plan (OSCP) was developed under the Federal and State Facility Response Plan requirements. The document defines procedures and plans for responding to discharges of oil into navigable waters and seeks to lessen damage to the environment, natural resources, and facility installations. The following elements are addressed within the plan:

- Incident Command Organization

- Facility description
- Hazards Evaluation Study and potential worst-case spill scenario evaluation
- On-water containment and recovery procedures
- Shoreline protection and clean-up
- Wildlife Care and Rehabilitation procedures
- Response procedures

The OSCP (Revision 3, July 2024) which covers all THUMS operating areas (Islands, B&M, Pier J) was provided by CRC. A cursory review of the plan for basic compliance verified inclusion of:

- Certificates of Financial Responsibility
- Pipeline and Hazardous Materials Safety Administration Approval Letter
- California Department of Fish and Wildlife Acknowledgement of Revision

The OSCP and any other required spill response plans will be more thoroughly evaluated during the upcoming audits of the manmade islands (Chaffee, Freeman, Grissom, White) where oil production occurs and where there is a higher likelihood of environmental damage due to oil spills.

B&M is a process safety management (PSM) regulated facility due to the presence of flammables and acutely hazardous materials (i.e. propane) in volumes specified in California Code of Regulations, Title 8, Section 5189 Appendix A by Cal/OSHA. As a PSM covered facility, an EAP that meets the requirements of California Code of Regulations, Title 8, Section 3220 is required. The B&M facility is covered by the CRC Emergency Action Plan (EAP). The EAP does not contain some of the elements listed in the Cal/OSHA regulation. (*SMP – 4.3.01*)

4.4 Training and Drills

CRC has a policy requiring all employees, contractors, and visitors to receive safety orientation training, be issued a security badge, and to sign-in upon entering an operating location. This policy provides a record that is used to account for personnel during an evacuation and enhances safety awareness and accountability.

CRC has an ongoing regulatory required training program for facility personnel and contractors. This training includes confined space entry, oil spill drills, hazard communication, HAZWOPER, hot/safe work permitting, H₂S, lockout / tagout, and personal protective equipment. The program appears to include all mandatory training as required by Cal/OSHA and the Office of Spill Prevention and Response. The training matrix appears to be well defined and effective for each job description. A refresher course on fire extinguishers is completed annually. Firefighting is encouraged only if the fire is small and can be safely done until the fire department arrives and takes command of the event.

4.5 Safety Management Programs

CRC has developed and implemented an array of Process Safety and Risk Management programs that were reviewed for this audit. These programs demonstrated substantial compliance with California Code of Regulations, Title 8, Section 5189 – the Cal/OSHA Process Safety Management standard. The programs reviewed include:

- HSE Risk Management Standard
- Facility Technical Information
- Management of Change
- Operating and Maintenance Procedures
- Pre-Startup Safety Review
- Process Hazard Review
- Mechanical Integrity Standard

The ongoing application of these process safety management elements has been shown to reduce the risk of loss of containment, employee exposure, and environmental damage in oil and gas processing facilities.

Most of the general workplace safety programs are collected in the CRC Safety Manual. These programs include Control of Hazardous Energy, Hazard Communication, Respiratory Protection, Confined Space Entry, Fall Protection, and Personal Protective Equipment.

CRC has a number of additional plans required by various regulatory agencies available on electronic file and hard copy, including the Business Emergency Plan (BEP). The Long Beach Fire Department approves CRC's BEP. This document is current and meets the Hazardous Materials Disclosure Program requirements of the city by providing the chemical inventory and other hazards on the lease to fire personnel. The Los Angeles County Environment Health Division retains chemical inventory data and other hazards on the lease. The BEP is available at each facility.

Human Factors Audit

California Resources
Corporation
Long Beach Unit
Broadway & Mitchell
Facility

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5.0 HUMAN FACTORS AUDIT

5.1 Goals of the Human Factors Audit

The primary goal of the Human Factors (HF) Audit is to evaluate the operating company's human and organizational factors by using the Safety Assessment of Management Systems (SAMS) interview process. The SAMS is planned to be conducted following audits of the Long Beach Unit (LBU) lease facilities. Interview results are considered confidential between CSLC and LBU and will be contained in a separate report.

SAMS was developed under the sponsorship of government agencies and oil companies from the United States, Canada, and the United Kingdom to assess organizational factors, enabling companies to reduce organizational errors, reduce the risk of environmental accidents, and increase safety. The assessment was divided into nine major categories to examine the following areas (The number of sub-categories or areas of assessment for each category are included in parentheses.):

- Management and Organizational Issues (9),
- Hazards Analysis (HA) (9),
- Management of Change (8),
- Operating Procedures (7),
- Safe Work Practices (5),
- Training and Selection (14),
- Mechanical Integrity (12),
- Emergency Response (8), and
- Investigation and Audit (9)

Assessment of each of the sub-categories is derived from one main question with a number of associated and detailed questions to help better define the issues.

The SAMS process is not intended to generate a list of action items. Its purpose is to provide the company with a confidential assessment of where it stands in developing and implementing its safety culture and to serve as a benchmark for future assessments.

5.2 Human Factors Audit Methodology

The Commission's MRMD staff will schedule the SAMS interviews with a cross-section of CRC staff and sub-contractors after completion of the Safety Audit. The assessors will evaluate the responses based on SAMS guidelines and develop a separate confidential report. The MRMD staff will provide the confidential report accompanied by a formal presentation that summarizes the report to CRC's management.

Action Item Matrix

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Appendices

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Appendix A

Acronyms

ANSI	American National Standards Institute
API	American Petroleum Institute
ASME	American Society of Mechanical Engineers
B&M	Broadway and Mitchell facility
BAP	Best Achievable Protection
BEP	Business Emergency Plan
Cal/OSHA	California Occupational Safety and Health Administration
CEC	California Electrical Code
CRC	California Resources Corporation
Commission	California State Lands Commission
DC	Direct Current
DOT	Department of Transportation
EAP	Emergency Action Plan
EFI	Equipment Functionality and Integrity
ELC	Electrical
EPA	Environmental Protection Agency
ESD	Emergency Shutdown
ESP	Electrical Submersible Pump
FWKO	Free Water Knock Out
GOV	California Government Code
HA	Hazards Analysis
HAECD	Hazardous Area Electrical Classification Drawings
HAZMAT	Hazardous Materials
HF	Human Factors
HMI	Human Machine Interface
H ₂ S	Hydrogen Sulfide
IEC	International Electrotechnical Commission
IT	Information Technology
ISA	International Society of Automation
JSA	Job Safety Analysis
kV	Kilovolt
kVA	Kilovolt Amperes
LBU	Long Beach Unit
LED	Light Emitting Diode
LEL	Lower Explosive Limit
MCC	Motor Control Center
MRMD	Mineral Resources Management Division
NEC	National Electrical Code
NEMA	National Electrical Manufacturers Association

NFPA	National Fire Protection Association
OSCP	Oil Spill Contingency Plan
OSHA	Occupational Safety & Health Administration
OSPR	Office of Spill Prevention and Response
P&ID	Piping and Instrumentation Diagram
PFD	Process Flow Diagram
PHA	Process Hazard Analysis
PLC	Programmable Logic Controller
PM	Preventive Maintenance
PPE	Personal Protective Equipment
PRC	Public Resources Code
PSM	Process Safety Management
PSV	Pressure Safety Valve
RP	Recommended Practice
SAMS	Safety Assessment of Management Systems
SCE	Southern California Edison
SDS	Safety Data Sheet
SMP	Safety Management Programs
SOP	Standard Operating Procedures
UPS	Uninterruptible Power Supply
UT	Ultrasonic Thickness
V	Volt

Appendix B

Best Practices & Regulations

Regulatory References

MRMD – California Code of Regulations (CCR) Title 2
CalGEM – CCR Title 14
Cal/OSHA - CCR Title 8
OSHA – CFR Title 29
EPA – Code of Federal Regulations (CFR) Title 40

1.0 INTRODUCTION

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Commission 2129 et seq.

CALGEM 1747.6

Commission 2129 et seq.

CALGEM 1743 & 1747

API 2001 & RP 75

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USCG 33 CFR Subcp. C, Part 67

USCG 33 CFR Subcp. C, Part 67

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Commission SAMS; BSEE

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Appendix C References

GOVERNMENT CODES, RULES, AND REGULATIONS

CCR CALIFORNIA CODE OF REGULATIONS

Title 2, Division 3, Chapter 1. State Lands Commission

- 2129 *General Provisions, including referencing to “all applicable laws, rules, and regulations of the United States and the State of California” and “good oilfield practice”.*
- 2132(g) *Production Facility Safety Equipment and Procedures*
- 2174 *Manual Review*

Title 8, Division 1, Chapter 4. Division of Industrial Safety [Ca/OSHA]

- 2320.4 *De-Energized Equipment or Systems*
- 3220 *Emergency Action Plan*
- 3272 *Aisles, Walkways, and Crawlways*
- 3328 *Machinery and Equipment*
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- 4002 *Moving Parts of Machinery or Equipment*
- 5157 *Permit-Required Confined Spaces*
- 5162 *Emergency Eyewash and Shower Equipment*
- 5189 *Process Safety Management of Acutely Hazardous Materials*
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CFR CODE OF FEDERAL REGULATIONS

Title 29, Subtitle B, Chapter XVII [OSHA]

- §5(a)(1) *General Duty Clause*

INDUSTRY CODES, STANDARDS, AND RECOMMENDED PRACTICES

ANSI AMERICAN NATIONAL STANDARDS INSTITUTE

- A13.1 *Scheme for the Identification of Piping Systems*
- Z358.1 *Emergency Eyewash and Shower Standard*

API	AMERICAN PETROLEUM INSTITUTE
RP 51R	<i>Environmental Protection for Onshore Oil and Gas Production Operations and Leases</i>
RP 55	<i>Oil and Gas Producing and Gas Processing Plant Operations Involving Hydrogen Sulfide</i>
RP 74	<i>Occupational Safety for Onshore Oil and Gas Production Operations</i>
RP 500	<i>Classification of Locations for Electrical Installations at Petroleum Facilities Classified as Class I, Division 1, and Division 2.</i>
API 510	<i>Pressure Vessel Inspection Code: Maintenance Inspection, Rating, Repair, and Alteration</i>
API 521	<i>Pressure-Relieving and De-pressuring Systems</i>
API 570	<i>Piping Inspection Code</i>
API 610	<i>Centrifugal Pumps for Petroleum, Petrochemical, and Natural Gas Industries</i>
RP 2003	<i>Protection Against Ignitions Arising Out of Static, Lightning, and Stray Currents</i>
RP 2217A	<i>Safe Work in Inert Confined Spaces in the Petroleum and Petrochemical Industries</i>
ASME	AMERICAN SOCIETY OF MECHANICAL ENGINEERS
B31.3	<i>Process Piping</i>
NFPA	NATIONAL FIRE PROTECTION AGENCY
70	<i>National Electric Code</i>
70E	<i>Standard for Electrical Safety in the Workplace</i>
101	<i>Life Safety Code</i>
497	<i>Recommended Practice for the Classification of Flammable Liquids, Gases, or Vapors and of Hazardous (Classified) Locations for Electrical Installations in Chemical Process Areas</i>
704	<i>Standard System for the Identification of the Hazards of Materials for Emergency Response</i>
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501	<i>Class I Locations</i>
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501.15	<i>Class I Locations – Sealing and Drainage</i>
501.30	<i>Grounding and Bonding, Class I, Divisions 1 & 2</i>
514.3	<i>Motor Fuel Dispensing Facilities – Classification of Locations</i>
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CBC

CALIFORNIA BUILDING CODE

11B 404.2.7	<i>Door and Gate Hardware</i>
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11B 404.2.9	<i>Door and Gate Opening Force</i>

Appendix D TEAM MEMBERS

FACILITY CONDITION TEAM

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ELECTRICAL TEAM

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SAFETY MANAGEMENT TEAM

Commission – MRMD	David Calderon Ryan Horton Crystal Garcia
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