



March 25, 2022

VIA EMAIL

Ms. Jacquelynn Ybarra, Planner
Santa Barbara County
Planning & Development
123 East Anapamu Street
Santa Barbara, CA 93101
jybarra@countyofsb.org



Dear Ms. Ybarra:

SCH NO. 2019029067 REVISED NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT, PLAINS REPLACEMENT PIPELINE PROJECT

The Geologic Energy Management Division (CalGEM) appreciates the opportunity to submit additional comment on the project referenced above (Project), received April 28, 2022. CalGEM provided a letter dated March 8, 2019 that included recommendations and identified oil and gas wells within approximately 500 feet of the proposed pipeline (Enclosure 1). CalGEM's recommendations and comments provided in the March 8, 2019 letter still apply to the Project.

Sincerely,

Miguel Cabrera

Miguel Cabrera,
Northern District Deputy

Enclosure

ZN:jj:ks

cc: Chrono / CSWR File / State Cleaning House / CEQA unit

State of California Natural Resources Agency | Department of Conservation

Northern District

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March 8, 2019

VIA U.S. MAIL AND EMAIL

Kathryn Lehr, Planner
Santa Barbara County
Planning & Development Center
123 East Anapamu Street
Santa Barbara, CA 93101

Dear Ms. Lehr,

SCH# 2019029067 PLAINS REPLACEMENT PIPELINE PROJECT NOTICE OF PREPARATION,
SANTA BARBARA COUNTY

The Division of Oil, Gas, and Geothermal Resources (Division) appreciates the opportunity to submit comments on the Plains Replacement Pipeline Project (Project).

The Division authority is set forth in Division 3 of the Public Resources Code (PRC), and Title 14 of the California Code of Regulations (CCR). PRC § 3208.1 establishes well re-abandonment responsibility when a previously plugged and abandoned well may be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near oil, gas, or geothermal wells.

The Division has reviewed the Notice of Preparation for the above referenced Project, received February 19, 2019. To assist local permitting agencies, property owners, and developers in making wise land use decisions regarding potential development near oil, gas, or geothermal wells, the Division provides the following information.

The Project is in Santa Barbara county, San Luis Obispo county, Kern county, and passes through several recognized oil and gas field boundaries. Santa Barbara county and San Luis Obispo county are within the Division's Coastal District jurisdiction. This letter only addresses wells within the Coastal District's responsibility and does not cover those in Kern county. Based upon a preliminary review, our records indicate there are 47 oil and gas wells located within approximately 500 feet of the Project in Santa Barbara county and San Luis Obispo county, 37 of which are plugged.

The list below provides an inventory of the oil and gas wells identified during the preliminary review. A detailed well record review was not performed to determine if the plugged wells were abandoned to current Division requirements as prescribed by law. There may be wells within the Project that require re-abandonment.

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Well API	Lease Name	Wei Status	Operator Name	County Name	Section	Township	Range	BM
0408304563	Luton	Actiw	Towne Exploration Company, LP	Santa Barbara	29	08N	31W	SB
0407900916	R.R. U.	Actiw	E & B Natural Resources Management Corporation	San Luis Obispo	30	11N	27W	SB
0407900993	GOU	Actiw	E & B Natural Resources Management Corporation	San Luis Obispo	25	11N	28W	SB
0407900996	GOU	Actiw	E & B Natural Resources Management Corporation	San Luis Obispo	25	11N	28W	SB
0408322291	Gar.,ay Water Well	Idle	Che.,,-on USA Inc.	Santa Barbara	35	05N	32W	SB
0407900909	R. R. U.	Idle	E & B Natural Resources Management Corporation	San Luis Obispo	30	11N	27W	SB
0407900938	R. R. U.	Idle	E & B Natural Resources Management Corporation	San Luis Obispo	25	11N	28W	SB
0407901026	R.R. U.	Idle	E & B Natural Resources Management Corporation	San Luis Obispo	25	11N	28W	SB
0407900995	GOU	Idle	E & B Natural Resources Management Corporation	San Luis Obispo	25	11N	28W	SB
0407900997	GOU	Idle	E & B Natural Resources Management Corporation	San Luis Obispo	25	11N	28W	SB
0408303737	Orella	Plugged	Rothschild Oil Co.	Santa Barbara	06	04N	30W	SB
0408300535	Covarrubias 1	Plugged	CalResources LLC	Santa Barbara	05	04N	30W	SB
0408321882	Orella	Plugged	Nordic Oil Company	Santa Barbara	06	04N	30W	SB
0408303736	Orella	Plugged	Rothschi Id Oil Co.	Santa Barbara	31	05N	30W	SB
0408303743	Careaga	Plugged	Che.,,-on U.S.A. Inc.	Santa Barbara	31	05N	30W	SB
0408300550	Covarrubias 1	Plugged	Saba Petroleum, Inc.	Santa Barbara	32	05N	30W	SB
0408300590	Orella	Plugged	CalResources LLC	Santa Barbara	32	05N	30W	SB
0408304370	Pierre F Baron Et Ux Core Hole	Plugged	Exxon Mobil Corporation	Santa Barbara	34	05N	31W	SB
0408300551	Covarrubias 1	Plugged	Saba Petroleum, Inc.	Santa Barbara	32	05N	30W	SB
0408300589	Orella	Plugged	CalResources LLC	Santa Barbara	32	05N	30W	SB
0408300591	Orella	Plugged	CalResources LLC	Santa Barbara	32	05N	30W	SB
0408300587	Covarrubias 2	Plugged	CalResources LLC	Santa Barbara	32	05N	30W	SB
0428304800	State 2199	Plugged	Harwst Natural Resources, Inc.	Santa Barbara Offshore	36	OSN	32W	SB
0408303872	Mercedes-Fox	Plugged	L. E. Broadhurst	Santa Barbara	35	OSN	32W	SB
0408304426	Weber	Plugged	San Roque Oil & Exploration Co.	Santa Barbara	31	07N	31W	SB
0408304442	Caldac	Plugged	Che.,,-on U.S.A. Inc.	Santa Barbara	19	07N	31W	SB
0408304356	Tinaquaic	Plugged	Che.,,-on U.S.A. Inc.	Santa Barbara	36	09N	32W	SB
0408304249	Tinaquaic	Plugged	Arco Oil and Gas Co.	Santa Barbara	36	09N	32W	SB
0408321017	Sisquoc Ranch Core Hole	Plugged	Che.,,-on USA Inc.	Santa Barbara	14	09N	32W	SB
0408304321	Rancho Suey Corehole	Plugged	Che.,,-on U.S.A. Inc.	Santa Barbara	20	10N	32W	SB
0407900183	Mettler	Plugged	C. W. Colgrow	San Luis Obispo	16	10N	25W	SB
0407900189	Russell	Plugged	C. W. Colgro.e	San Luis Obispo	34	11N	27W	SB
0407900951	F. R. Anderson	Plugged	J.P. Oil Company, LLC	San Luis Obispo	32	11N	27W	SB
0407900991	Cuyama Ranch o	Plugged	Halwrn L Norris	San Luis Obispo	25	11N	28W	SB
0407900954	F.R. Anderson	Plugged	J.P. Oil Company, LLC	San Luis Obispo	25	11N	28W	SB
0407900956	F.R. Anderson	Plugged	J.P. Oil Company, LLC	San Luis Obispo	25	11N	28W	SB
0407901018	F.R. Anderson	Plugged	J.P. Oil Company, LLC	San Luis Obispo	25	11N	28W	SB
0407900949	Hadley	Plugged	F. R. Anderson Associates	San Luis Obispo	25	11N	28W	SB
0407900952	F.R. Anderson	Plugged	J.P. Oil Company, LLC	San Luis Obispo	25	11N	28W	SB
0407900984	Lease by Cuyama Oil Co.	Plugged	Cuyama Oil Co.	San Luis Obispo	25	11N	28W	SB
0407900994	Griggs-russell	Plugged	Nonis Oil Company	San Luis Obispo	25	11N	28W	SB
0407900988	Indian	Plugged	E. Jorgensen	San Luis Obispo	23	11N	28W	SB
0407900983	Kosanke	Plugged	C. W. Colgrme	San Luis Obispo	23	11N	28W	SB
0407901035	Indian	Plugged	Arco Oil and Gas Co.	San Luis Obispo	23	11N	28W	SB
0407900989	Kosanke	Plugged	Michael Kadlec	San Luis Obispo	15	11N	28W	SB
0407900149	Brownson, Cuyama	Plugged	Brownson Drill Co. & Assoc	San Luis Obispo	15	11N	28W	SB
0407900190	Russell	Plugged	C. W. Colgro.e	San Luis Obispo	16	11N	28W	SB

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The Division categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. Access is considered the ability for a well servicing unit and associated necessary equipment to reach a well from a public street or access way, soleyly over the parcel on which the well is located. A well servicing unit, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure. Items that can affect well access include, but are not limited to, buildings, housing, permanent equipment, infrastructure, fencing, hardscape, landscape, trees, pools, patios, sidewalks, roadways, parking lots, waterways or channels, and decking. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access.

There are no guarantees a well abandoned in compliance with current Division requirements will not start leaking in the future. It always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. The Division acknowledges wells plugged and abandoned to the most current standards have a lower probability of leaking in the future, however there is no guarantee that such abandonments will not leak.

The Division advises that all wells identified on the development parcel prior to, or during, development activities be tested for liquid and gas leakage. Surveyed locations should be provided to the Division in Latitude and Longitude, NAD 83 decimal format. The Division expects any wells found leaking to be reported to it immediately.

Failure to plug and re-abandon a well may result in enforcement action, including an order to perform re-abandonment well work, pursuant to PRC§ 3208.1, and 3224.

PRC§ 3208.1 gives the Division the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment, or if the well is not accessible or visible. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for re-abandonment as:

1. **The property owner** - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.
2. **The person or entity causing construction over or near the well** - If the well was plugged and abandoned in conformance with Division requirements at the time

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Kathryn Lehr

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of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be re-abandoned, or to follow the advice of the supervisor or district deputy not to undertake the construction, then the person or entity causing the construction over or near the well shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.

3. The party or parties responsible for disturbing the integrity of the abandonment -

If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the re-abandonment.

To view PRC § 3208.1 in its entirety, please visit:

<https://www.conservation.ca.gov/index/Documents/DOGGR-SR-1%20Web%20Copy.pdf>

No well work may be performed on any oil, gas, or geothermal well without written approval from the Division. Well work requiring written approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other abandonment or re-abandonment work. The Division also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR§ 1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet below grade. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this regulation, a permit from the Division is required before work can start.

The Division makes the following additional recommendations to the local permitting agency, property owner, and developer:

1. To ensure that present and future property owners are aware of (a) the existence of all wells located on the property, and (b) potentially significant issues associated with any improvements near oil or gas wells, the Division recommends that information regarding the above identified well(s), and any other pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.
2. The Division recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.

March 8, 2019

Kathryn Lehner

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As indicated in PRC § 3106, the Division has jurisdictional authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and

attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources, damage to underground oil, gas, and geothermal deposits, and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to the Division's authority to order work on wells pursuant to PRC §§ 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC §§ 3236, 3236.5, and 3359 for violations within the Division's jurisdictional authority. The Division does not regulate grading, excavations, or other land use issues.

If during development activities any wells are encountered that were not part of this review, a Division engineer in the Coastal District - Orcutt office is to be notified immediately, and an amended site plan with well casing diagrams for Division review shall be filed. After appropriate review, the District office will send a follow-up well evaluation letter to the property owner, applicant, and local permitting agency.

Thank you for considering the Division's comments. If you have any questions, please contact our district office at (805) 937-7246 or via email at DOGGRCoastal@conservation.ca.gov.

Sincerely,



Patricia A. Abel
Coastal District Deputy

cc: State Clearinghouse
OLRA, Christine Hansen
CEQA Unit
DOGGR Coastal, Jordan Martin
CSWR File
Chrono