



April 22, 2019

State Clearinghouse
State.Clearinghouse@opr.ca.gov
 PO Box 3044
 Sacramento, CA 95812-3044

Governor's Office of Planning & Research

APR 22 2019

STATE CLEARINGHOUSE

CEQA Project: **SCH # 2019039136**
 Lead Agency: **Department of Water Resources**
 Project Title: **Lookout Slough Restoration Project**

The Division of Oil, Gas, and Geothermal Resources (Division) oversees the drilling, operation, maintenance, and plugging and abandonment of oil, natural gas, and geothermal wells. Our regulatory program emphasizes the wise development of oil, natural gas, and geothermal resources in the state through sound engineering practices that protect the environment, prevent pollution, and ensure public safety. Northern California is known for its rich gas fields. Division staff have reviewed the documents depicting the proposed project.

The Lookout Slough Restoration Project would restore approximately 3,000 acres of tidal marsh within the project area (Map 1) that would help satisfy the Department of Water Resources obligations under Reasonable and Prudent Alternative (RPA) 4 of the 2008 United States Fish and Wildlife Service Delta Smelt Biological Opinion and is consistent with RPA 1.6.1 of the 2009 National Marine Fisheries Service Salmonid Biological Opinion for the coordinated operations of the State Water Project and the Central Valley Project. The Proposed Project would create habitat that is beneficial to wildlife including delta smelt, giant garter snake, and other fish and wildlife species, and widen a portion of the Yolo Bypass to increase flood storage and conveyance, increase the resiliency of levees, and reduce flood risk.

Map 1 shows locations of thirty-seven (37) known abandoned wells located within the project area, and locations of three planned, but never installed, wells. Note that the Division has not verified the actual location of the wells nor does it make specific statements regarding the adequacy of abandonment procedures with respect to current standards. A summary of well details is included in Table 1 (attached). For future reference, you can review wells located on private and public land at the Division's website: <https://maps.conservation.ca.gov/doggr/wellfinder/#close>

Based on our review of available data, it is possible that the abandoned wellheads can impact or be impacted by work on this site, particularly in areas of planned excavations along the west side of the project and especially if excavation is to approach or exceed five (5) feet below grade. Please see Map 1 and Map 2 for locations of abandoned and idle wells on the project site and in the site vicinity. Records indicate that the abandoned well heads can be as shallow as four to five (4-5)

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feet below ground surface. It would be advisable to verify the location and depth to the top of the wells prior to any work at the site in the areas where the work will involve any excavation, deeper soil movement, breaching or degrading existing or future levees, excavating tidal channels, relocating utility infrastructure, etc. Please consult with the Division and property owners prior to any removal of concrete well pads or uncovering of the well heads.

The local permitting agencies and property owner should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near oil and gas wells. These issues are non-exhaustively identified in the following comments and are provided by the Division for consideration by the local permitting agency, in conjunction with the property owner and/or developer, on a parcel-by-parcel or well-by-well basis. As stated above, the Division provides the above well review information solely to facilitate decisions made by the local permitting agency regarding potential development near a gas well.

1. It is recommended that access to a well located on the property be maintained in the event re-abandonment of the well becomes necessary in the future. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access. This includes, but is not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, sidewalks, and decking.
2. Nothing guarantees that a well abandoned to current standards will not start leaking oil, gas, and/or water 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 that wells abandoned to current standards have a lower probability of leaking oil, gas, and/or water in the future, but makes no guarantees as to the adequacy of this well's abandonment or the potential need for future re-abandonment.
3. Based on comments **1** and **2** above, the Division makes the following general recommendations:
 - a. Maintain physical access to any gas well encountered.
 - b. Ensure that the abandonment of gas wells is to current standards.

If the local permitting agency, property owner, and/or developer chooses not to follow recommendation "**b**" for a well located on the development site property, the Division believes that the importance of following recommendation "**a**" for the well located on the subject property increases. If recommendation "**a**" cannot be followed for the well located on the subject property, then the Division advises the local permitting agency, property owner, and/or developer to consider any and all alternatives to proposed construction or development on the site (see comment **4** below).

4. Sections 3208 and 3255(a)(3) of the Public Resources Code give the Division the authority to order the re-abandonment of any well that is hazardous, or that poses a danger to life, health, or natural resources. Responsibility for re-abandonment costs for any well may be affected by the choices made by the

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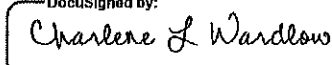
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local permitting agency, property owner, and/or developer in considering the general recommendations set forth in this letter. (Cal. Public Res. Code, § 3208.1.)

5. Maintaining sufficient access to a gas well may be generally described as maintaining "rig access" to the well. Rig access allows a well servicing rig and associated necessary equipment to reach the well from a public street or access way, solely over the parcel on which the well is located. A well servicing rig, 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.
6. If, during the course of development of this proposed project, any unknown well(s) is/are discovered, the Division should be notified immediately so that the newly-discovered well(s) can be incorporated into the records and investigated. The Division recommends that any wells found in the course of this project, and any 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. This is to ensure that present and future property owners are aware of (1) the wells located on the property, and (2) potentially significant issues associated with any improvements near oil or gas wells.

No well work may be performed on any oil or gas well without written approval from the Division in the form of an appropriate permit. This includes, but is not limited to, mitigating leaking fluids or gas from abandoned wells, modifications to well casings, and/or any other re-abandonment work. (NOTE: The Division regulates the depth of any well below final grade (depth below the surface of the ground). Title 14, Section 1723.5 of the California Code of Regulations states that all 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 grade regulation, a permit from the Division is required before work can start.)

Sincerely,

DocuSigned by:

087F73D5E411447
Charlene L. Wardlow
Northern District Deputy

Attachments: Maps (2)

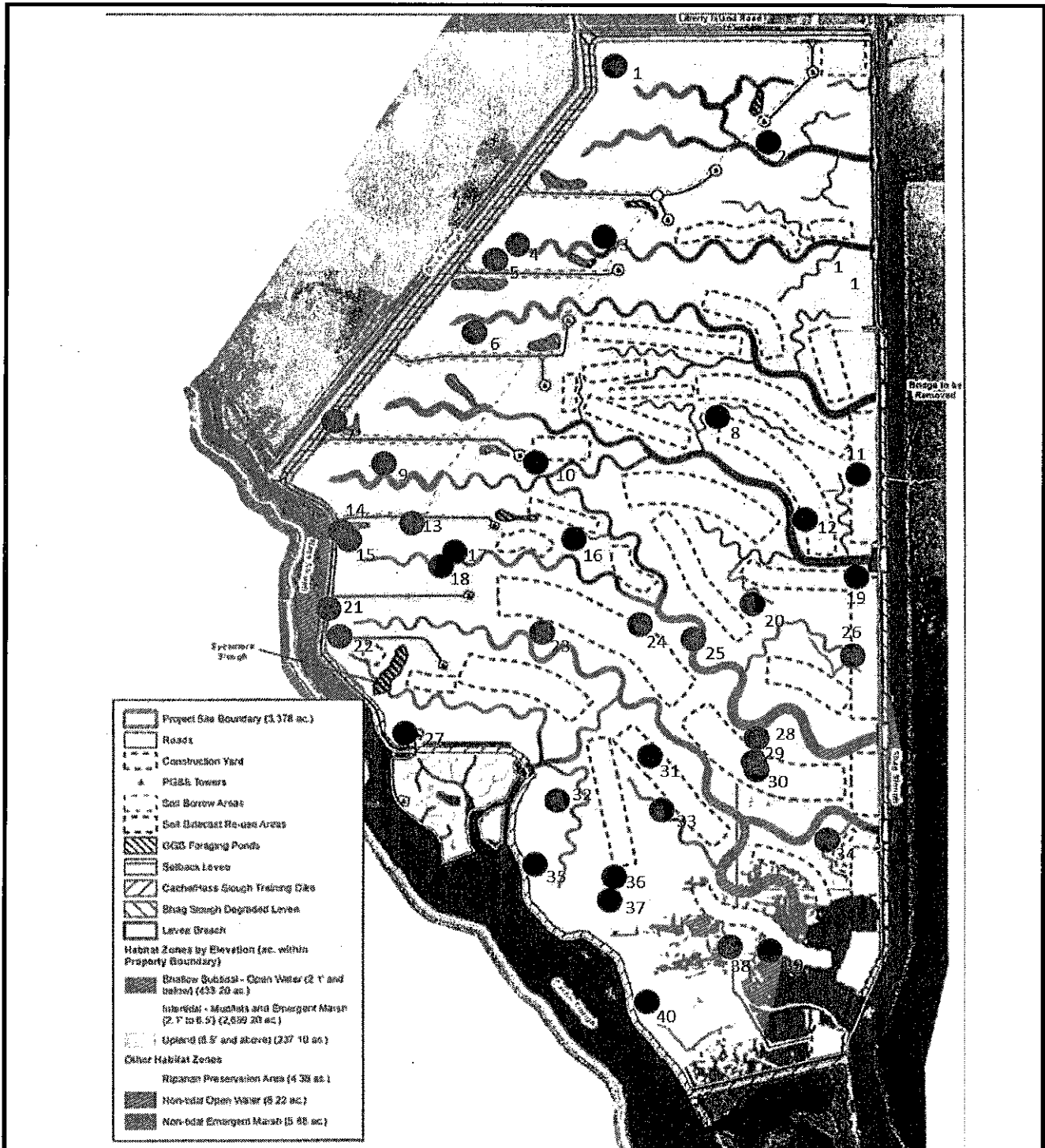
Cc: Heather Green

Heather.Green@water.ca.gov

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● 40 **FORMER GAS WELLS**
Reference Well Number in Attached Spreadsheet

1 Mile

Map 1
LOCATIONS OF AFFECTED WELLS
Lookout Slough Restoration Project
Solano County California
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