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Governor's Office of Planning & Research

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Yolo County Department of Community Services

292 West Beamer Street

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AUG 22 2019

STATE CLEARINGHOUSE

CEQA Project: **SCH # 20190089053**

Lead Agency: **Yolo County Department of Community Services**

Project Title: **Teichert Shifler Mining and Reclamation Project**

The Division of Oil, Gas, and Geothermal Resources (DOGGR) 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 Teichert Shifler Mining and Reclamation Project includes gravel mining and subsequent reclamation of an area three miles west of Woodland.

The attached map shows locations of one known abandoned dry hole within the project area. Based on the Project map submitted by Yolo County, this is the only well known to be within the proposed mining area. That well, the Capitol Oil Corporation Torrence-Claar 28-1, was drilled to a depth of 4,913 ft and abandoned as a dry hole in 1994. Cement plugs were placed from 2,658 to 2,408 ft (base of fresh water plug), from 823 to 634 ft (shoe plug), and from 25 ft below grade to the surface. The well was cut off 5 ft below grade. The well is near the west edge of Phase A of the proposed mining program. Based on the maps provided, the immediate vicinity of the well would be excavated to a depth of 35 to 40 ft.

Note that DOGGR has not verified the actual location of the well nor does it make specific statements regarding the adequacy of abandonment procedures with respect to current standards. The developer is advised to verify the locations of all wells where development is expected to disturb the soil around the wells.

DOGGR regulations require that abandoned wells have “the hole and all annuli shall be plugged at the surface with at least a 25-foot cement plug. The district deputy may require that inner strings of uncemented casing be removed to at least the base of the surface plug prior to placement of the plug. All well casing shall be cut off at least 5 feet but no more than 10 feet below the surface of the ground. The district

deputy may approve a different cut-off depth, as conditions warrant, including but not limited to excavation or grading operations for construction purposes. As defined in Section 1760(j), a steel plate at least as thick as the outer well casing shall be welded around the circumference of the casing at the top of the casing, after Division approval of the surface plug. The steel plate shall show the well's identification, indicated by the last five digits of the API well number. Authority: Sections 3013 and 3106, Public Resources Code. Reference: Section 3106, Public Resources Code. § 1723.5.

In light of that requirement, DOGGR would require that a permit be obtained, that the well be cut off at the maximum depth of proposed excavation, and that a cement plug be placed at least 25 ft below that elevation. Subsequently the casing should be cut off 5 to 10 ft below that point and a steel plate affixed to the top of the casing with the well identifier number welded onto it. The location should also be surveyed for future reference.

For future reference, you can review wells located on private and public land at DOGGR's website: <https://maps.conservation.ca.gov/doggr/wellfinder/#close>. 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 DOGGR 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, DOGGR 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. DOGGR 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, DOGGR 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

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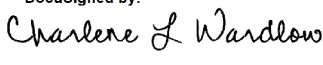
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property, then the Division advises the local permitting agency, property owner, and/or developer to consider any and all alternatives to proposed construction or development on the site (see comment **4** below).

4. Sections 3208 and 3255(a)(3) of the Public Resources Code give DOGGR 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 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, DOGGR should be notified immediately so that the newly-discovered well(s) can be incorporated into the records and investigated. DOGGR 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 DOGGR 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: DOGGR 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 DOGGR is required before work can start.)

Sincerely,

DocuSigned by:

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Northern District Deputy

Attachments: Map

Teichert Shifler Mining and Reclamation Project Map

