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Kristin Doud, Principal Planner
Stanislaus County Department of Planning and Community Development
1010 10th Street, Suite 3400
Modesto, California 95354
doudk@stancounty.com

Governor's Office of Planning & Research

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Subject: CEQA Project: SCH 2019090255
Construction Site Well Review (CSWR) ID: 256301
Assessor Parcel Number: 013014007
Property Owner(s): Cal Sierra Financial, Inc.
**Lead Agency: Stanislaus County Department of Planning and
Community Development**
**Project Title: General Plan Amendment and Rezone Application No.
PLN2019-0079 Cal Sierra Financial, Inc.**

STATE CLEARINGHOUSE

The California Geologic Energy Management Division (CalGEM) 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. Public Resources Code (PRC) § 3208.1 establishes well reabandonment responsibility when a previously plugged and abandoned well will be impacted by planned property development or construction activities.

The 9.6-acre site is proposed to develop a convenience store/community market, gas station, restaurant, retail building, and mini-storage facility to be developed on approximately four acres of the site. The project proposes the following uses:

- 2,310 square feet of retail space
- 3,250 square feet of fast-food restaurant space with drive-thru and outdoor dining area
- Service station with six pumps
- Two above-ground gasoline storage tanks
- 4,500 square feet of convenience market space
- 61,460 square feet of mini storage with 1,400 square feet of office space

The mini-storage buildings are proposed to be placed along the southeastern, eastern, and northern boundaries of the project site.

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.

Considering that requirement, CalGEM 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.

There are no guarantees a well abandoned in compliance with current CalGEM requirements as prescribed by law 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. CalGEM acknowledges wells plugged and abandoned to the most current CalGEM requirements as prescribed by law have a lower probability of leaking in the future; however, there is no guarantees that such abandonments will not leak. CalGEM 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 CalGEM 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 reabandon the well may result in enforcement action, including an order to perform reabandonment well work, pursuant to PRC § 3208.1, and 3224. For future reference, you can review wells located on private and public land at CalGEM's website:
<https://maps.conservation.ca.gov/calGEM/wellfinder/#close>.

The issues that may be associated with development near oil and gas wells are non-exhaustively identified in the following comments and are provided by CalGEM 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, CalGEM provides the above well review information solely to facilitate decisions made by the local permitting agency regarding potential development near a gas well.

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.

1. 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. CalGEM acknowledges that wells abandoned to current

1. The property owner - If the well was plugged and abandoned in conformance with Division requirements at the time of 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 reabandon the well and be responsible for the reabandonment.
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 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 reabandoned, 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 reabandon the well and be responsible for the reabandonment.
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 reabandonment.

No well work may be performed on any oil or gas well without written approval from CalGEM 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: CalGEM 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 CalGEM is required before work can start.)

Sincerely,

Charlene L Wardlow

Paul P. L.

Charlene L Wardlow
Northern District Deputy

Attachments: Map