



09/25/2020

County: Los Angeles - Los Angeles County Department of Regional Planning

Richard Claghorn

320 West Temple Street, Los Angeles, CA 90012, USA

rclaghorn@planning.lacounty.gov

Governor's Office of Planning & Research

Nov 10 2020

STATE CLEARINGHOUSE

Construction Site Well Review (CSWR) ID: 1012125

Assessor Parcel Number(s): 2865019014, 2865019015, 2865019064, 2865019065, 2865019066, 2865012003

Property Owner(s): Jeff Preach, David Zemach, Deke Pike

Project Location Address: West of The Old Road, Castaic, California, 91384

Project Title: Castaic Mountain View Apartments Construction Site Well Review

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. 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, and geothermal wells.

The Division of Oil, Gas, and Geothermal Resources (Division) has received and reviewed the above referenced project dated 7/16/2020. 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 well evaluation.

The project is located in Los Angeles County, within the boundaries of the following fields:

Castaic Hills

Based on the documents provided by the County of Los Angeles Department of Regional Planning, 6 known oil and gas wells are within the Assessor Parcel Number (APN) project boundaries and the development area that includes easements.

The wells in the project area that currently are projected to be built over or have access impeded include wells "Harding" 31-36 (API 0403701229), a plugged and abandoned dry hole, "Twomey" 2 (API 0403701233) and "Twomey" 3 (API 0403701234), plugged and abandoned oil and gas wells.

"Harding" 32-36 (API 0403701223), a plugged and abandoned oil and gas well and "CHU lease Sect 36" 13-36 (API 0403701194), a plugged and abandoned waterflood well, are in parcels associated with the project but are not currently projected to be built over or have access impeded.

"CHU lease Sect 36" 33-36 (API 0403701204) operated by Crimson Resource Management Corp., is



an active oil and gas well that will remain active through project implementation according to the Initial Study provided by Envicom Corporation. It is in a parcel associated with the project but is not projected to be impacted by the development as displayed on the site map. This development will make "CHU lease Sect 36" 33-36 a critical well as defined by California Code of Regulations (CCR) § 1720.(a)(1) which defines a "Critical well" as a well within 300 feet of any building intended for human occupancy that is not necessary to the operation of the well.

Two additional plugged oil and gas wells, "CHU" 244-36 (API 0403701221) and "CHU lease Sect 36" 134-36 (API 0403701219) are proximal to the southern boundary of the development. If future development plans project development to impact access to these wells or if they are encountered during development, please notify the Division's construction site well review engineer in the Coastal district office.

Our records indicate there are 6 known oil or gas wells located within the project boundary as identified in the application.

- Number of wells Not Abandoned to Current Division Requirements as Prescribed by Law and Projected to Be Built Over or Have Future Access Impeded by this project: 3
- Number of wells Not Abandoned to Current Division Requirements as Prescribed by Law and Not Projected to Be Built Over or Have Future Access Impeded by this project: 3
- Number of wells Abandoned to Current Division Requirements as Prescribed by Law and Projected to Be Built Over or Have Future Access Impeded by this project: 0
- Number of wells Abandoned to Current Division Requirements as Prescribed by Law and Not Projected to Be Built Over or Have Future Access Impeded by this project: 0

The Division categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access including, but not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, sidewalks, roadways, and decking. Maintaining sufficient 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, solely 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.

There are no guarantees a well abandoned in compliance with current Division 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. The Division acknowledges wells plugged and abandoned to the most current Division 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.



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 reabandon the well may result in enforcement action, including an order to perform reabandonment well work, pursuant to PRC § 3208.1, and 3224.

PRC § 3208.1 give 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 reabandonment as:

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, gas, or geothermal well without written approval from the



Division. Well work requiring approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other 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.

As indicated in PRC § 3106, the Division has statutory 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, the property owner is expected to immediately notify the Division's construction site well review engineer in the Coastal district office, and file for Division review an amended site plan with well casing diagrams. The District office will send a follow-up well evaluation letter to the property owner and local permitting agency.

Should you have any questions, please contact me at (805) 937-7246 or via email at Pat.Abel@conservation.ca.gov

Sincerely,



California
Department of Conservation
Geologic Energy Management Division

Gavin Newsom, Governor
David Shabazian, Director
801 K Street, MS 18-05
Sacramento, CA 95814
T: (916) 445-9686

Pat Abel
Coastal District Deputy



Wells Not Abandoned to Current Division Requirements as Prescribed by Law & Projected to be Built Over or Have Future Access Impeded

The wells listed below are not abandoned to current Division requirements as prescribed by law, and based upon information provided, are projected to be built over or have future access impeded. **The Division expects these wells to be reabandoned in compliance with current California law, prior to development activities.**

API	Well Designation	Operator	Well Evaluations
04037012 29	Harding 31-36	Conoco Inc.	Violates § 1723.1. Plugging of Oil or Gas Zones. (a) Plugging in an Open Hole. A cement plug shall be placed to extend from the total depth of the well or from at least 100 feet below the bottom of each oil or gas zone, to at least 100 feet above the top of each oil or gas zone. Violates § 1723.3. Plugging at a Casing Shoe. If the hole is open below a shoe, a cement plug shall extend from at least 50 feet below to at least 50 feet above the shoe. Violates § 1723.5. Surface Plugging. The hole and all annuli shall be plugged at the surface with at least a 25-foot cement plug.
04037012 34	Twomey 3	Conoco Inc.	Violates 1723.2. Plugging for Freshwater Protection. (b) Plugging in a Cased Hole. (2) If the top of the cement behind the casing is below the top of the highest saltwater sands, squeeze-cementing shall be required through perforations to protect the freshwater deposits. In addition, a 100-foot cement plug shall be placed inside the casing across the fresh-saltwater interface. Violates § 1723.5. Surface Plugging. The hole and all annuli shall be plugged at the surface with at least a 25-foot cement plug. This is a critical well as defined in California CCR, title 14, to Section 1720(a). This well is in an environmentally sensitive area as defined in California CCR, title 14, to Section 1760(f)."
04037012 33	Twomey 2	Conoco Inc.	"Does not Meet Current Regulations. Violates § 1723.1. Plugging of Oil or Gas Zones. (b) Plugging in a Cased Hole. All perforations shall be plugged with cement. Violates § 1723.5. Surface Plugging. The hole and all annuli shall be plugged at the surface with at least a 25-foot cement plug. This is a critical well as defined in California CCR, title 14, to Section 1720(a). This well is in an environmentally sensitive area as defined in California CCR, title 14, to Section 1760(f)."



Wells Not Abandoned to Current Division Requirements as Prescribed by Law & Not Projected to be Built Over or Have Future Access Impeded

The wells listed below are not abandoned to current Division requirements as prescribed by law, and based upon information provided, are not projected to be built over or have future access impeded.

API	Well Designation	Operator	Well Evaluations
04037012 23	Harding 32-36	Petrominer als Corp.	Violates 1723.2. Plugging for Freshwater Protection. (b) Plugging in a Cased Hole. (2) If the top of the cement behind the casing is below the top of the highest saltwater sands, squeeze-cementing shall be required through perforations to protect the freshwater deposits. In addition, a 100-foot cement plug shall be placed inside the casing across the fresh-saltwater interface.
04037011 94	CHU lease Sect 36 13-36	Crimson Resource Manageme nt Corp.	Violates § 1723.1. Plugging of Oil or Gas Zones. (b) Plugging in a Cased Hole. All perforations shall be plugged with cement. Violates 1723.2. Plugging for Freshwater Protection. (b) Plugging in a Cased Hole. (2) If the top of the cement behind the casing is below the top of the highest saltwater sands, squeeze-cementing shall be required through perforations to protect the freshwater deposits. In addition, a 100-foot cement plug shall be placed inside the casing across the fresh-saltwater interface.
04037012 04	CHU lease Sect 36 33-36	Crimson Resource Manageme nt Corp.	