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CEQA Project #: SCH **2020090561**
Document Type: Initial Study/Positive Declaration
Project Lead Agency: City of Stockton
Project Title: South Stockton Commerce Center Project

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. CalGEM staff have reviewed the documents depicting the proposed project.

The proposed project is a Site Approval application to develop approximately 437-acres of land which will include: industrial, commercial, open space, public facilities, and public roadway right-of-way land uses.

The attached maps show the location of two gas wells that are plugged and abandoned. The first well is the Reynolds and Carver "Nielsen" 1 (API 0407720021), drilled and abandoned in 1967. The second well is the Westates Expl. Co. "Nielsen" 1 (API 0407720098), drilled and abandoned in 1969. Based on the project map submitted, the wells are within the construction area. No other wells impact or are impacted by the proposed work. Note that the Division has not verified the actual location of the well.

The Reynolds and Carver "Nielsen" 1 (API 0407720021) well may not be abandoned to standard. The hydrocarbon zone plug appears to be too shallow, and there is no base of fresh water plug at 800' (This is only a preliminary estimate of the base of fresh water and is subject to change). The shoe plug and surface plug are placed correctly.

The Westates Expl. Co. "Nielsen" 1 (API 0407720098) well appears to be abandoned to standard. The hydrocarbon zone plug is placed correctly. The shoe plug coincides with

the base of fresh water zone and is placed correctly (Please note this is based off of a preliminary estimate of base of fresh water at 800'. A better estimate of the base of fresh water may change the abandoned standard of this well). The surface plug is placed correctly.

For future reference, you can review wells located on private and public land at CalGEM'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 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.

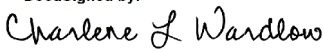
- 1.** It is recommended that access to a well located on the property be maintained in the event abandonment of the well becomes necessary in the future. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access. This includes, but is not 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. CalGEM 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, CalGEM makes the following general recommendations:
 - a.** Maintain physical access to any gas well encountered.
 - b.** Ensure that the abandonment of gas well(s) 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, CalGEM 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 CalGEM 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 CalGEM the authority to order the abandonment or re-abandonment of any well that is hazardous, or that poses a danger to life, health, or natural resources.

Responsibility for abandonment and or 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 development of this proposed project, any unknown well(s) is/are discovered, CalGEM should be notified immediately so that the newly-discovered well(s) can be incorporated into the records and investigated. CalGEM recommends that any well(s) 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 well(s) 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 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,

DocuSigned by:

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Charlene L Wardlow
Northern District Deputy

cc: Jan Perez

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