



August 11, 2021

**VIA EMAIL**

Governor's Office of Planning & Research

**August 11 2021**

**STATE CLEARINGHOUSE**

Ms. Holly Owen  
County of Santa Barbara  
624 W. Foster Road Suite C  
Santa Maria, CA 93455  
[howen@countyofsb.org](mailto:howen@countyofsb.org)

Dear Ms. Owen:

ARCTIC COLD AGRICULTURAL PROCESSOR AND FREEZER PROJECT DRAFT  
ENIRONMENTAL IMPACT REPORT (EIR), STATE CLEARINGHOUSE NO. 2020100453

The California Geologic Energy Management Division (CalGEM) reviewed the above referenced project, received June 29, 2021. CalGEM previously provided comments on the Notice of Preparation in a letter dated November 18, 2020. These comments included an enclosure that was a comment letter with recommendations sent to Mr. Dan Ringstmeyer on December 20, 2019 regarding preliminary plans for the project. CalGEM's recommendations and comments specified in the November 18, 2020 letter and enclosure (previous comments) are still applicable for this project.

CalGEM would like to take the opportunity to comment on information presented in the Draft EIR and reiterate certain recommendations pertaining to the three plugged and abandoned oil wells impacted by the project.

1. Impact HAZ-2 of the Draft EIR mentions the wells being re-abandoned in compliance with current CalGEM standards and not being built over. Please see additional recommendations mentioned in CalGEM's previous comments including maintaining access to the well for future potential well work. As previously mentioned, "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. Items that can affect well access include, but are not limited to, buildings, housing, fencing, hardscape, landscape, trees, pools, patios, sidewalks, roadways, parking lots, waterways or channels, and decking. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access."

State of California Natural Resources Agency | Department of Conservation

Coastal District

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[conservation.ca.gov](http://conservation.ca.gov)

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2. Figure 2-3 Project Site Plan of the Draft EIR shows the three plugged and abandoned oil wells near structures or features. For example, "Vincent" 21 API 083-02662 is in between a waste-water basin and the building. "Vincent" 22 API 083-02663 and "Vincent" 9 API 083-02661 are near the building footprint. These features and structures have the potential to impede future access to the wells if not properly accounted for. The exact set-back distances of the proposed features and structures from the wells are not clearly shown or discussed in the Draft EIR. As previously recommended, please consider contacting multiple oil well rig companies to determine what would be required for a rig to access these specific wells after development. Ensure approved placement of structures and features allows for adequate rig access and does not in any way impede access to the wells. Consider incorporating set-back dimensions in review documents to ensure future access is maintained during the course of construction.
3. Figure 2-3 Project Site Plan shows APN for each well's American Petroleum Institute (API) well number. To be correct, APN should be replaced with API.

Thank you for considering CalGEM's comments. If you have any questions, please contact our District office at (805) 937-7246 or via email at [CalGEMCoastal@conservation.ca.gov](mailto:CalGEMCoastal@conservation.ca.gov).

Sincerely,



Signature on behalf of Baldev Gill

Baldev Gill,  
Acting Chief Deputy

JM:ji:ks

cc: Jan Perez  
CEQA  
OLRA  
SCH  
Chrono  
CSWR  
Well File