



April 18, 2019

State Clearinghouse
State.Clearinghouse@opr.ca.gov
PO Box 3044
Sacramento, CA 95812-3044

Governor's Office of Planning & Research
APR 18 2019
STATE CLEARINGHOUSE

CEQA Project: **SCH # 2005072046**
Lead Agency: **Central Valley Flood Protection Board** in cooperation with
Sacramento District of the U.S. Army Corps of Engineers and the
Sacramento Area Flood Control Agency
Project Title: **Beach Stone Lakes Mitigation Site**, a portion of The American River
Watershed Common Features 2016 Project

The Division of Oil, Gas, and Geothermal Resources (Division) 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 Central Valley Flood Protection Board, in cooperation with Sacramento District of the U.S. Army Corps of Engineers and the Sacramento Area Flood Control Agency, is considering approval of a plan to construct a mitigation site located south of the Freeport township along River Road / Highway 160, west of Highway 5 and north of Morrison Creek, to mitigate for the loss of riparian habitat as a result of the American River Watershed Common Features 2016 Project. This project will create approximately 24 acres of riparian habitat. The land being used to create this mitigation site is traditionally agricultural in use and once converted to a riparian habitat will be held in perpetuity as riparian habitat. The plants and woody vegetation will be made up of trees such as cottonwoods, shrubs/scrubs, and native grasses, creating a multi-tiered living space for wildlife and a wind barrier to reduce soil erosion of farmland in the area. When completed, this site will be self-sufficient and require no further maintenance once success criteria are met. Specifically, construction work will involve plowing and disking soil in preparation and shallow digging to plant containers. The attached map (Map 1) shows one known abandoned natural gas well located within the project area, but necessarily within the work area. Note that the Division 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. For future reference, you can review wells located on private and public land at the Division's website: <https://maps.conservation.ca.gov/doggr/wellfinder/#close>.

Based on our review of available data, it is possible that the abandoned well could impact work on this site. Division records indicate that the abandoned well could be as shallow as four (4) feet below ground surface. It would be advisable to verify the location and depth to the top of the well prior to any work at the site.

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 the Division 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, the Division 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. The Division 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, the Division 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 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 the Division 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

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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, the Division should be notified immediately so that the newly-discovered well(s) can be incorporated into the records and investigated. The Division 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 the Division 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: The Division 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 the Division is required before work can start.)

DocuSigned by:

Charlene L. Wardlow

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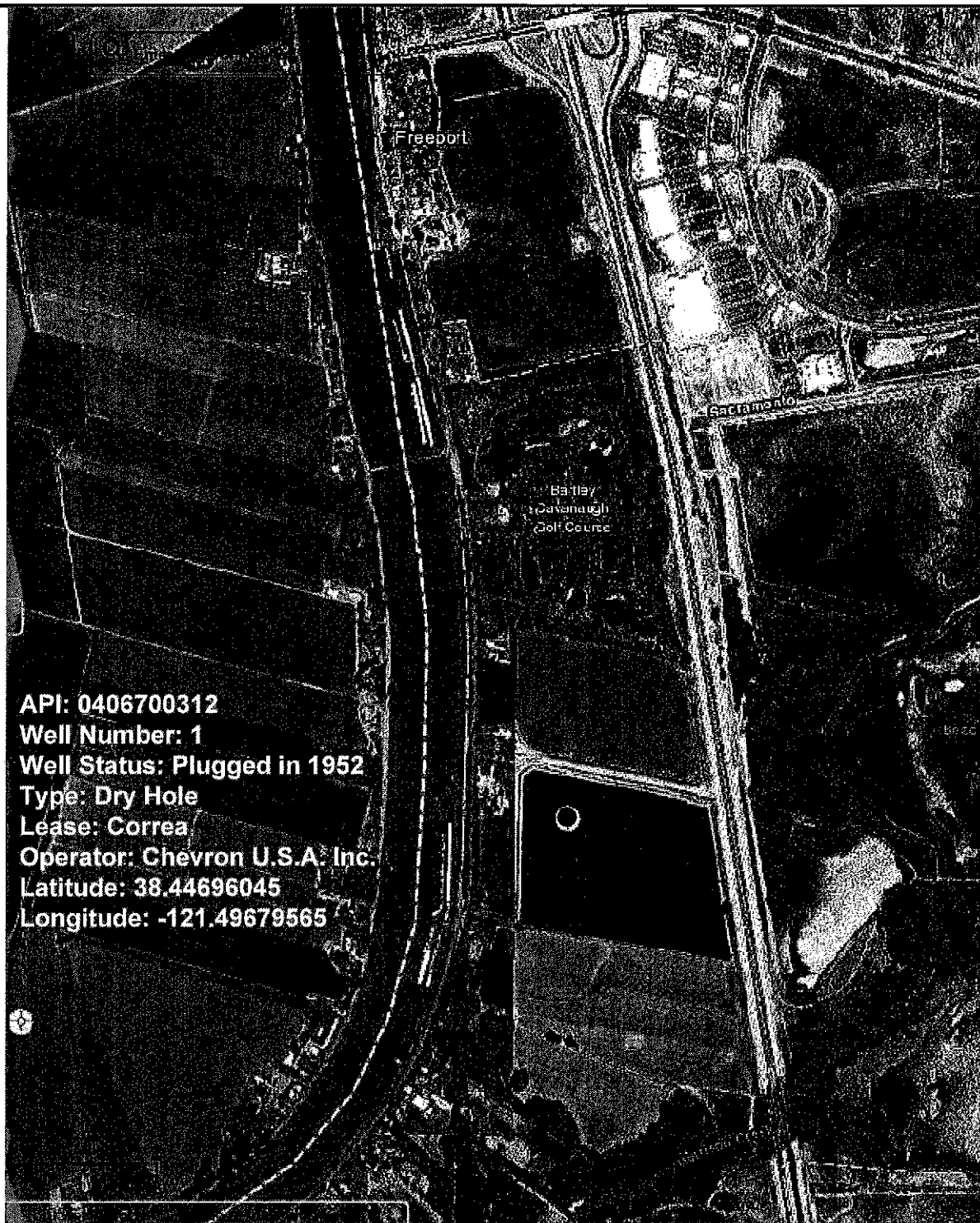
Charlene L. Wardlow

Northern District Deputy

Attachment

cc: ARCF – BSLMS

ARCF2016Project@usace.army.mil



API: 0406700312
Well Number: 1
Well Status: Plugged in 1952
Type: Dry Hole
Lease: Correa
Operator: Chevron U.S.A. Inc.
Latitude: 38.44696045
Longitude: -121.49679565

0406700312 ● Approximate Well Location

0.2 Mile



NORTH

MAP 1
WELL LOCATION MAP
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Sacramento County, California