

March 22, 2019

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

Governor's Office of Planning & Research
 MAR 22 2019
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CEQA Project: **SCH# 2019029089**
 Lead Agency: **County of Lake – Community Development Department**
 Project Title: **Harbin Hot Springs Resort (Heart Consciousness Church)**

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 and geothermal energy fields, and as such, division staff have reviewed the above referenced documents depicting the proposed project. The County of Lake – Community Development Department is issuing a Mitigated Negative Declaration regarding the Harbin Hot Springs Resort (Heart Consciousness Church) project. Resulting from a 95% loss of infrastructure due to the 2015 Valley Fire, the purpose of this project is to redevelop the facilities on the destroyed site. Comprised of 2,689 acres to be utilized as a mixed use commercial resort and teaching facility, the project requires a General Plan Amendment, a land use rezoning, a General Plan of Development, a Major Use Permit, and an Initial Study.

Division staff have reviewed the documents describing the proposed project area; ten known plugged and abandoned shallow geothermal temperature gradient wells are located within the proposed project area. The Well Location Map below shows these plugged and abandoned wells. A final letter was issued indicating the wells were abandoned to standard at that time. As these were shallow temperature gradient wells, a 1" to 1 ½" pipe was installed in the well to measure temperatures. Abandonment included the placing of a surface plug in the well bore and restoration of the well location. The ten wells are referred to as the **"HS" 4, API#: 03390122, "HS" 6, API#: 03390124, "HS" 9, API#: 03390127, "HS" 12A, API#: 03390343, "HS" 17, API#: 03390717, "HS" 18, API#: 03390718, "HS" 20, API#: 03390346, "HS" 24, API#: 03390350, "HS" 27, API#: 03390353, and "HS" 28, API#: 03390354.** The Division has conducted a

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records and map review within the proposed project boundary but not an on-site evaluation of any known geothermal wells located within the project boundary.

For future reference, you can review geothermal wells located on private and public land at the Division's website:

<https://www.conservation.ca.gov/dog/geothermal/geosteam>.

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, or geothermal 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 geothermal 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, whether abandoned to current standards or not, will not start leaking subsurface fluids in the future. It always remains a possibility that any well may start to leak 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 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 geothermal well encountered.
 - b. Ensure that the abandonment of geothermal well 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 all alternatives to proposed construction or development on the site (see comment **4** below).

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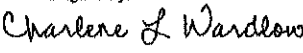
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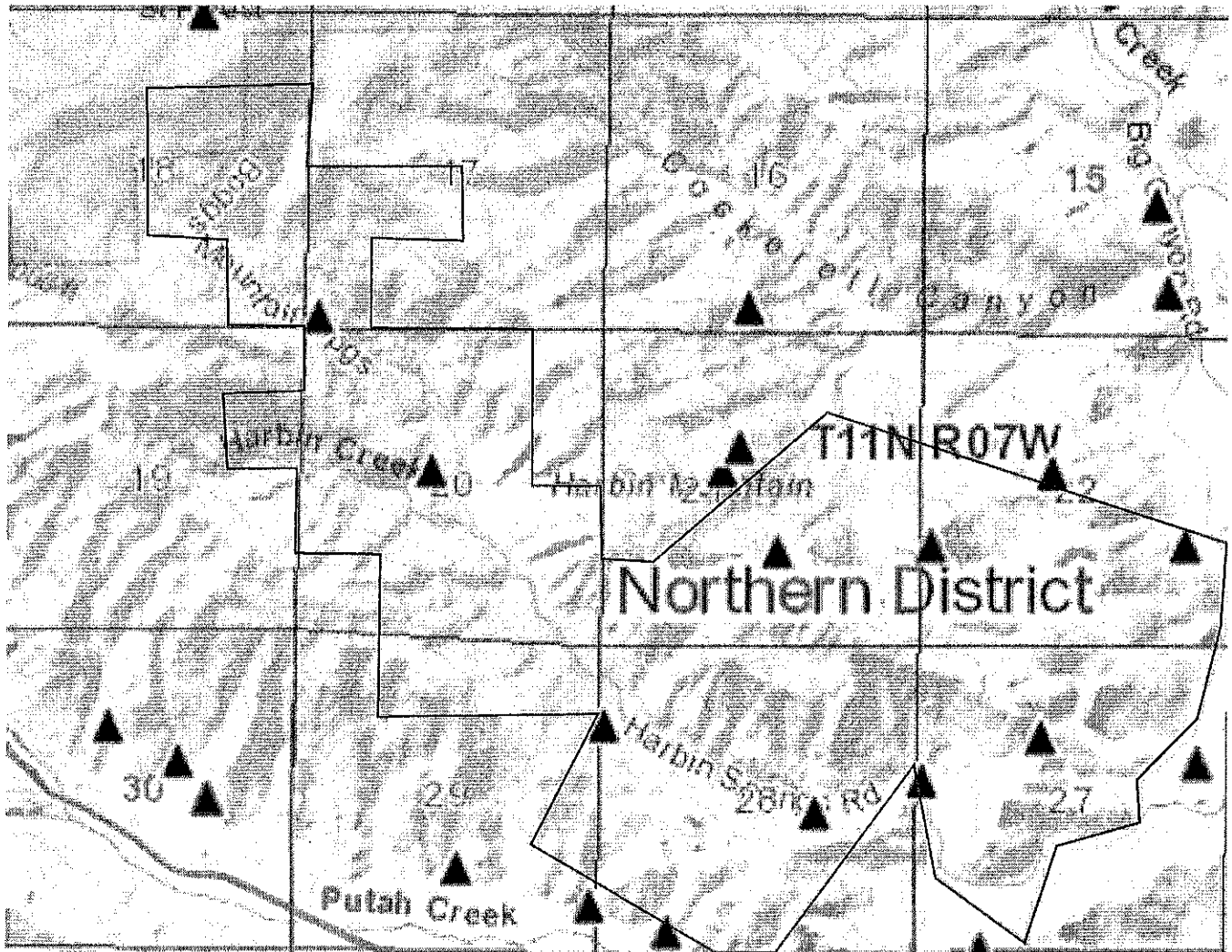
4. Sections 3700 and 3714 of the Public Resources Code give the Division the authority to order the re-abandonment of any well that is hazardous, or that poses a danger to life, health, or natural resources. Responsibility for re-abandonment costs for any well may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general recommendations set forth in this letter.
5. Maintaining sufficient access to a geothermal 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 development of this proposed project, **any unknown geothermal 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 during 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 geothermal wells.

No well work may be performed on any low or high temperature geothermal 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 1981 of the California Code of Regulations states that all well casings shall be cut off at least 6 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.)

Sincerely,

DocuSigned by:

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Charlene L Wardlow
Northern District Deputy

cc: Mark Roberts
cdd@lakecountyca.gov



Project Boundaries are approximate.