



March 18, 2019

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Governor's Office of Planning & Research

MAR 18 2019

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CEQA Project: **SCH #2019029126**
Lead Agency: **Reclamation District 341**
Project Title: **Sherman Island Belly Wetland Restoration 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.

Reclamation District 341 is issuing a Mitigated Negative Declaration regarding the Sherman Island Belly Wetland Restoration Project. This project comprises a total of 1,936 acres in which a total of 1000 acre of palustrine wetlands will be restored through a combination of reestablishment and rehabilitation. The purpose of the project will be to stop or reverse subsidence, create habitat, and sequester atmospheric carbon. By maintaining permanent and adequate water levels, the growth and subsequent decomposition of emergency vegetation is expected to grow peat, which will raise the surface elevation on the property.

Division staff have reviewed the documents describing the proposed project area; ten known plugged and abandoned natural gas wells are located within the proposed project area. The enclosed Well Location Map shows these plugged and abandoned gas wells. Of these ten wells three of them are not plugged and abandoned to current standards. The three wells are referred to as the "Sherman Island Gas Unit B" B-1 API: **0406700348**, the "Upham" 6 API: **04066720004** and the "Baldocchi-State" 1 API: **0406700003**. The Division has conducted a records and map review within the proposed project boundary but not an on-site evaluation of any known gas wells located within the project boundary.

For future reference, you can review wells located on private and public land at the Division's website: <https://secure.conservation.ca.gov/WellSearch>.

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:
4.
 - a. Maintain physical access to any oil or gas well encountered.
 - b. Ensure that the abandonment of oil or 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).

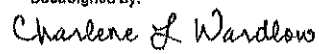
5. Sections 3208 and 3255(a)(3) of the Public Resources Code give the Division the authority to order the re-abandonment of any well that is hazardous, or that poses a danger to life, health, or natural resources. Responsibility for re-abandonment costs for any well may be affected by the choices made 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.)

6. 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.
7. 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.)

Sincerely,

DocuSigned by:

Charlene L. Wardlow
Northern District Deputy

Attachment: Well Location Map

cc: Jesse W. Barton

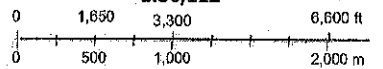
jbarton@gallerybartonlaw.com


Sherman Island Well Location Map




March 15, 2019

1:36,112



 **Plugged and Abandoned Gas Well**

 **Restoration Area**

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community