



California
Department of Conservation
Division of Oil, Gas, and Geothermal Resources

Gavin Newsom, Governor
David Bunn, Director

June 6, 2019

State Clearinghouse

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STATE CLEARINGHOUSE

CEQA Project: **Comments and Conditions**

Lead Agency: **City of Brentwood Community Development**

Project Title: **Bridle Gate 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 Bridle Gate Project includes single-family and apartment housing, a school, and a park southwest of Sand Creek Road and west of Highway 4 in Brentwood.

The attached map shows locations of seven known abandoned wells within the Project area. Based on the Project map submitted by the City of Brentwood, four wells appear to be located within planned road ways. One is projected to be on the proposed school site, probably in play yard space based on the inferred likely configuration of the school (buildings likely to be on the southwest side of the parcel). One is southwest of proposed development and not likely to be impacted by current plans.

One well, Occidental Petroleum Corporation's Ward 31-10, appears to be located within a proposed residential parcel; the well was drilled in 1963 to a depth of 5,108 feet and abandoned in 1985. The well casing was cut off five feet below surface grade at the time of abandonment.

Note that the DOGGR has not verified the actual location of the wells nor does it make specific statements regarding the adequacy of abandonment procedures with respect to current standards. The developer is advised to verify the locations of all wells where development is expected to disturb the soil above the wells and to mark or note the accurate locations for future reference. For wells in roadways special care should be taken to route utilities around

the wells. 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>

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 DOGGR 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 DOGGR provides the above well review information solely to facilitate decisions made by the local permitting agency regarding potential development near a gas or oil 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 DOGGR 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 DOGGR makes the following general recommendations:
 - a. Maintain physical access to any oil or gas well encountered.
 - b. Ensure that the abandonment of oil and/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 DOGGR 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 DOGGR 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 DOGGR 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

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forth in this letter. (Cal. Public Res. Code, § 3208.1.)

5. Maintaining sufficient access to an oil or 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 DOGGR should be notified immediately so that the newly-discovered well(s) can be incorporated into the records and investigated. The DOGGR 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 DOGGR 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 DOGGR 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 DOGGR is required before work can start.

Sincerely,

DocuSigned by:



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Charlene L Wardlow

Northern District Deputy

Attachments: Map

Cc: City of Brentwood Community Development
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