



June 25, 2019

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Governor's Office of Planning & Research

**JULY 25 2019**

**STATE CLEARINGHOUSE**

CEQA Project: **SCH #2019060254**  
Lead Agency: **Del Puerto Water District**  
Project Title: **Del Puerto Canyon Reservoir Project**

The Division of Oil, Gas, and Geothermal Resources (DOGGR) 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 Del Puerto Canyon Reservoir Project includes construction of a dam and inundation of Del Puerto Canyon and west of Interstate Highway 5 west of Patterson. The attached map shows locations of seven known abandoned dry holes within the project area. Based on the Project map submitted by the Del Puerto Water District, four wells appear to be located within the inundation zone, two are outside the proposed reservoir south and east of the proposed dam, and one is upstream of the proposed inundation zone. One well, Shell Western Exploration and Production Inc. Elfers 36X-28, is close to one of the proposed saddle dams. That well should be verified to be outside of proposed construction prior to disturbing soil in that area.

Note that 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 especially care should be taken to route utilities around the wells.

For future reference, you can review wells located on private and public land at DOGGR'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 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, DOGGR 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. 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, DOGGR 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 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 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, DOGGR should be notified immediately so that the

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newly-discovered well(s) can be incorporated into the records and investigated. 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.

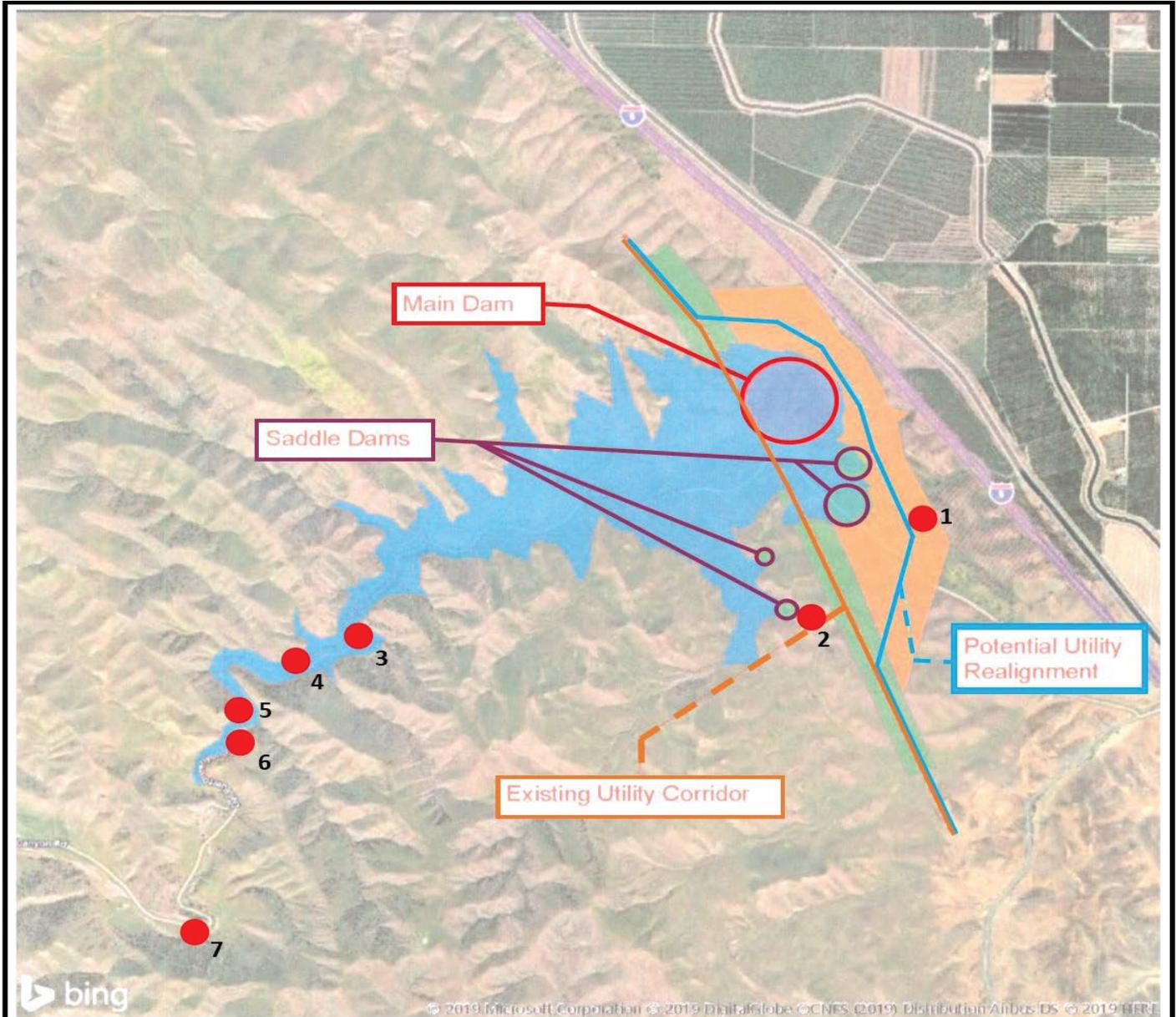
No well work may be performed on any oil or gas well without written approval from DOGGR in the form of an appropriate permit. This includes, but is not limited to, mitigating leaking fluids or gas from abandoned wells, modifications to well casings, and/or any other re-abandonment work. (NOTE: DOGGR 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 DOGGR is required before work can start.)

Sincerely,

DocuSigned by:  
  
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Jerry Salera

Senior Oil and Gas Engineer (Supervisor)

Attachments: Map



**DRY HOLES IN PROJECT AREA**

MAP #	API #	Operator	Well Name	Depth	Year Drilled
1	09920018	Phillips Petroleum	Hanson B-1	7121'	1975
2	09900050	Shell Western E&P	Elfers 36X-28	4993'	1952
3	09920035	Senate Res., Inc.	Senate Res. #6	505'	1981
4	09920034	Senate Res., Inc.	Senate Res. #5	960'	1981
5	09900049	Luard Corp.	Luard Valerdi #1	120'	1961
6	09920033	Senate Res., Inc.	Senate Res. #4	520'	1981
7	09900059	Martin Shurin, Jr.	Martin Shurin #1	3082'	1961



● Dry hole



**LOCATIONS OF AFFECTED WELLS**  
**Del Puerto Canyon Reservoir Project**  
**Stanislaus County, California**  
**SCH #2019060254**