



DEPARTMENT OF CONSERVATION

Managing California's Working Lands

DIVISION OF OIL, GAS, & GEOTHERMAL RESOURCES

801 K STREET • MS 20-20 • SACRAMENTO, CALIFORNIA 95814

PHONE 916 / 445-9686 • FAX 916 / 323-0424 • TDD 916 / 324-2555 • WEB SITE conservation.ca.gov

February 1, 2012

Ms. Terry Macaulay
Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, CA 95814

DRAFT ENVIRONMENTAL IMPACT REPORTS AND DRAFT ENVIRONMENTAL IMPACT REPORT FOR DELTA PLAN (PER 2008 DELTA REFORM ACT) (SCH# 2010122028)

Dear Ms. Macaulay:

The Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the Draft Environmental Impact Report (DEIR) prepared for the above referenced project. Our comments are as follows.

The Division is mandated by Section 3106 of the Public Resources Code (PRC) to supervise the drilling, operation, maintenance, and plugging and abandonment of wells for the purpose of preventing: (1) damage to life, health, property, and natural resources; (2) damage to underground and surface waters suitable for irrigation or domestic use; (3) loss of oil, gas, or reservoir energy; and (4) damage to oil and gas deposits by infiltrating water and other causes. Furthermore, the PRC vests in the State Oil and Gas Supervisor (Supervisor) the authority to regulate the manner of drilling, operation, maintenance, and abandonment of oil and gas wells so as to conserve, protect, and prevent waste of these resources, while at the same time encouraging operators to apply viable methods for the purpose of increasing the ultimate recovery of oil and gas.

The scope and content of information that is germane to the Division's responsibility are contained in PRC Section 3000 et seq., and administrative Regulations under Title 14, Chapter 4 of the California Code of Regulations (CCR).

The Division recommends that all existing well sites and oil production facilities within or in close proximity to proposed project area be accurately plotted on future project maps and be carefully studied before the commencement of any construction of the proposed projects. According to the CCR, Title 14, Chapter 4, Article 2, Section 1720 (a)(2)(B) and (C), any well within 100 feet of any navigable body of water or watercourse perennially covered by water or any officially recognized wildlife preserve becomes a critical well. Critical wells require higher blowout prevention equipment (BOPE) than non-critical wells based on pressure testing and rating. The Division recommends that adequate safety measures be taken by the project manager to prevent people from gaining unauthorized access to oilfield equipment. Safety shut-down devices on wells and other oilfield equipment must be considered when appropriate.

Written approval from the Supervisor is required prior to changing the physical condition of any well. The operator's notice of intention (notice) to perform any well operation is reviewed on engineering and geological basis. For new wells and the altering of existing wells, approval of the proposal depends primarily on the following: protecting all subsurface hydrocarbons and fresh waters;

protection of the environment; using adequate blowout prevention equipment; and utilizing approved drilling and cementing techniques. The Division must be notified to witness or inspect all operations specified in the approval of any notice. This includes tests and inspections of blowout-prevention equipment, reservoir and freshwater protection measures, and well-plugging operations.

If any plugged and abandoned or unrecorded wells are damaged or uncovered during excavation or grading, remedial plugging operations may be required. If such damage or discovery occurs, the Division's district offices must be contacted to obtain information on the requirements for and approval to perform remedial operations. The Division recommends that no structure be built over or in proximity to an abandoned well location. The PRC Section 3208.1 authorizes the Supervisor to order the re-abandonment of a previously abandoned well when construction of any structure over or in the proximity of a well could result in a hazard. The cost of re-abandonment operations is the responsibility of the owner or developer of the project upon which the structure will be located.

We appreciate the opportunity to comment on the DEIR for the proposed project. If you have questions on our comments, or require technical assistance or information, please call me at (916) 323-0425 or any of the following district offices of the Division:

➤ Oil and Gas Wells

- Cypress: Syndi Pompa, (714) 816-6847
- Ventura: Bruce Hesson, (805) 654-4761
- Santa Maria: Ross Brunetti, (805) 937-7246
- Bakersfield: Dayne Frary, (661) 334-4601;
- Coalinga: Tim Boardman, (559) 935-2941; and
- Sacramento: Mike Woods, (916) 322-1110

➤ Geothermal Wells

- Sacramento: Jack Truschel, (916) 322-1787
- El Centro: Cliff Parli, (760) 353-9900
- Santa Rosa: Joe Austin, (707) 576-2385

Sincerely,



Yuko Sakano, Ph.D.
Environmental Scientist

cc: Syndi Pompa, Division Oil and Gas District 1 Engineer
Bruce Hesson, Division Oil and Gas District 2 Deputy
Ross Brunetti, Division Oil and Gas District 3 Engineer
Dayne Frary, Division Oil and Gas District 4 Engineer
Tim Boardman, Division Oil and Gas District 5 Deputy
Mike Woods, Division Oil and Gas District 6 Deputy
Jack Truschel, Division Geothermal District 1 Engineer
Cliff Parli, Division Geothermal District 2 Engineer
Joe Austin, Division Geothermal District 3 Engineer
Tian-Ting Shih, Ph.D., Division Environmental Program Manager