



May 9, 2019

State Clearinghouse

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Sacramento, CA 95812-3044

CEQA Project: **SCH #2018072076**

Lead Agency: **Humboldt County**

Project Title: **Humboldt Wind Energy 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 County of Humboldt is issuing a notice of preparation of a Draft Environmental Impact Report regarding the Humboldt Wind Energy Project. This project would construct and operate 60 wind turbine generators and associated infrastructure with a nameplate generating capacity of up to 155 megawatts. In addition to the wind turbines and transformers, the Project would include ancillary facilities such as temporary staging areas, access roads, 34.5-kilovolt collection lines, an operations and maintenance building, a substation with energy storage infrastructure, utility switchyard modification, and a 115-kV Gen-Tie.

Division staff have reviewed the documents and figures describing the proposed project areas. There are no known gas wells within the project areas shown on Figure 2a. Project Area and Plan and within the project area shown on Figure 2b Project Area and Plan. Figure 1. Project Vicinity shows the component delivery route that follows highway 101. There are two plugged gas wells within one-hundred feet of highway 101 in Fields Landing, (see Well Location Map Fields Landing) The are referred to as the **Pacific Gas and Electric Company "WCC" 14 API: 0402320033** and the **Pacific Gas and Electric Company "WCC" 14-A API: 0402320040**. The documents provided don't specify what the component delivery route is or how it would be constructed. If it requires excavation it may impact one or both gas wells. The enclosed Well Location Maps show the locations of gas wells near the proposed project areas. 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.

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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

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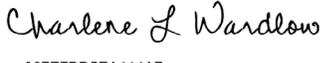
Division advises the local permitting agency, property owner, and/or developer to consider any and all alternatives to proposed construction or development on the site (see comment **4** below).

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 gaswells.

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.)

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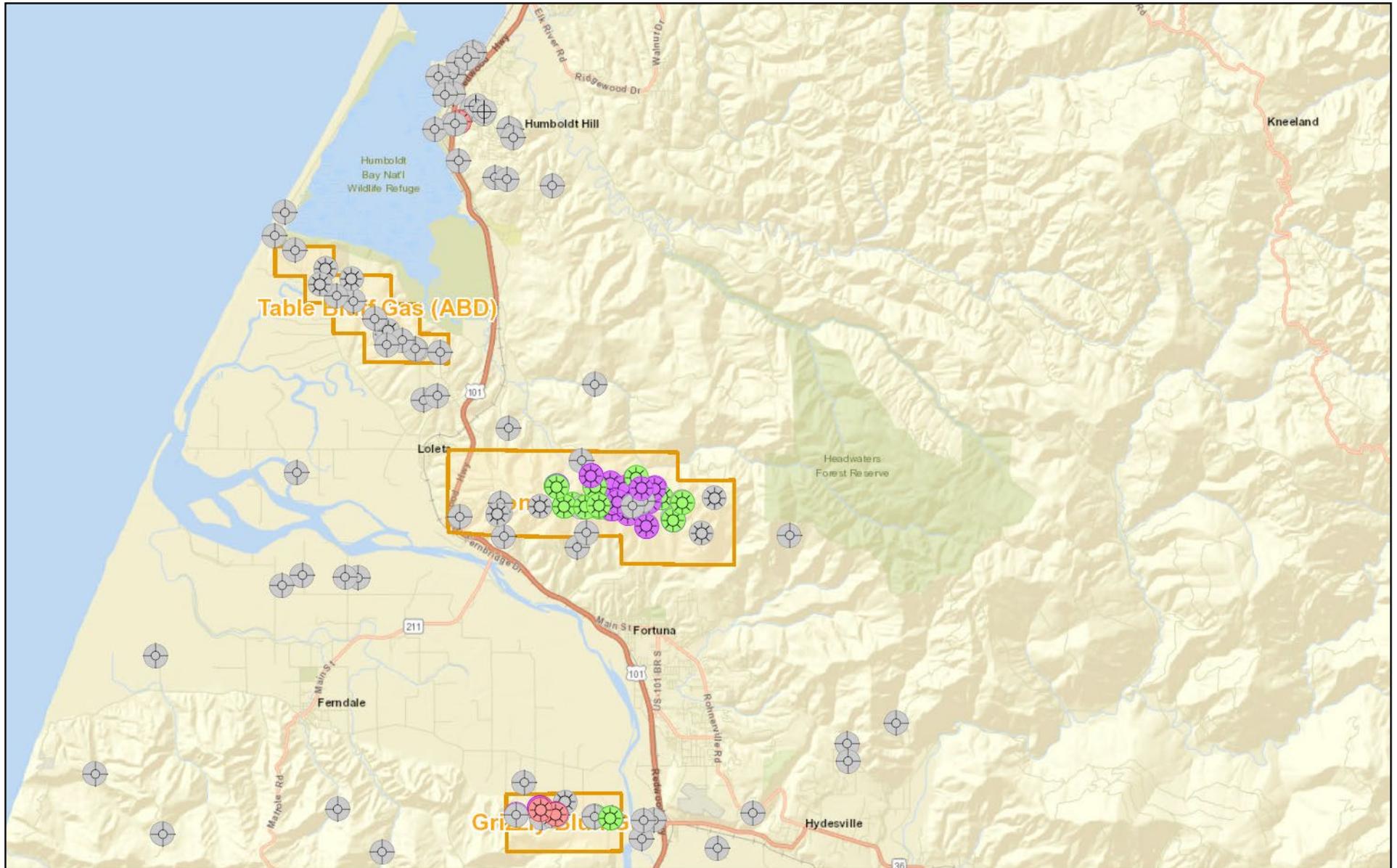
Sincerely,

DocuSigned by:

067E7BD5EA114A7
Charlene L. Wardlow
Northern District Deputy

Attachment: Well Location Map Northern Area
Well Location Map Southern Area
Well Location Map Fields Landing

Cc: Elizabeth Burks
CEQAResponses@co.humboldt.ca.us

Well Locations in Northern Area



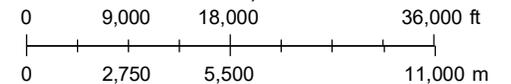
May 7, 2019

Well

-  Active Gas Gas Well
-  Plugged & Abandoned Gas Well
-  Canceled Well

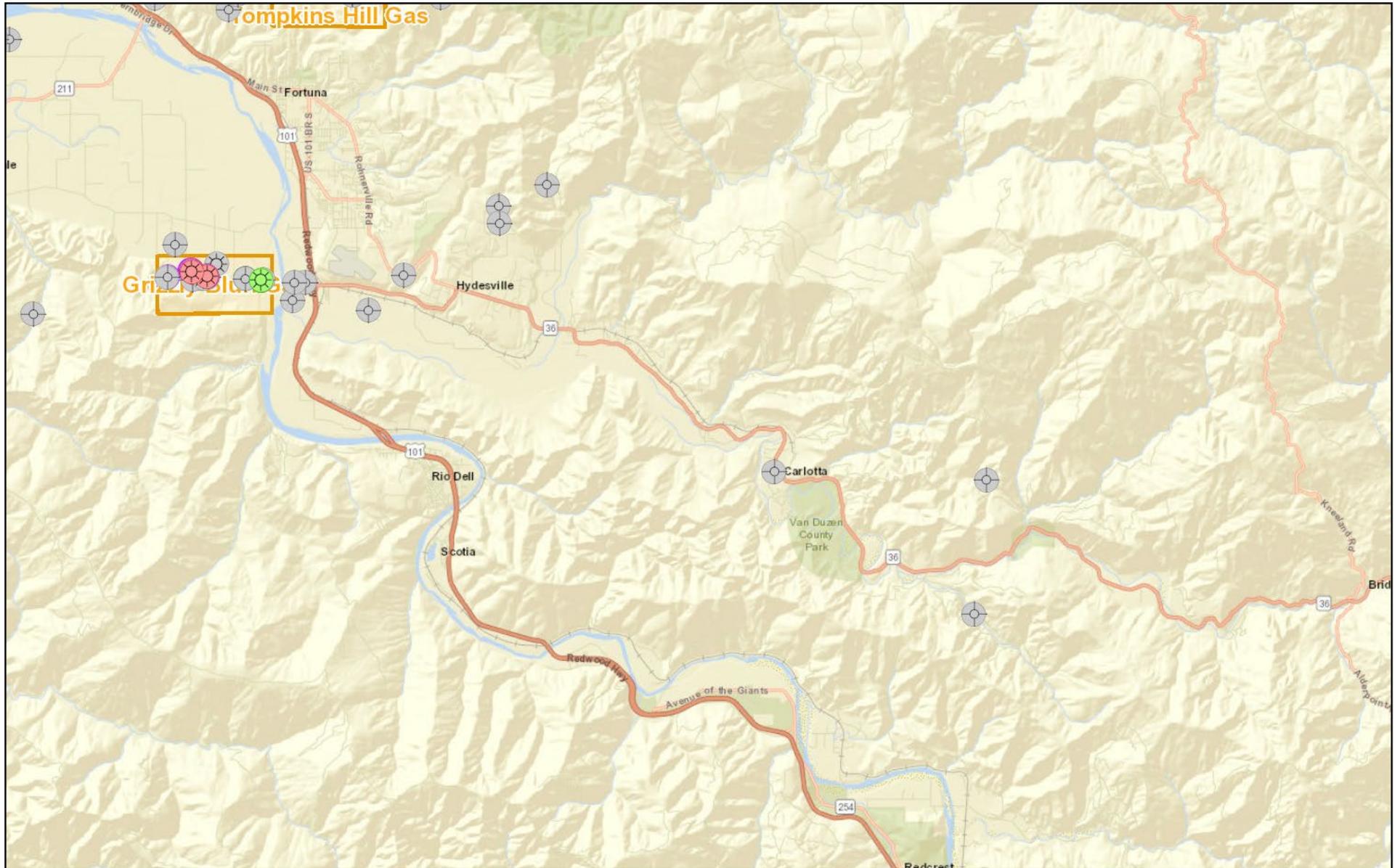
 Idle Gas Well

1:202,377



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand),

Well Locations in Southern Area

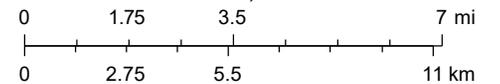


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Well

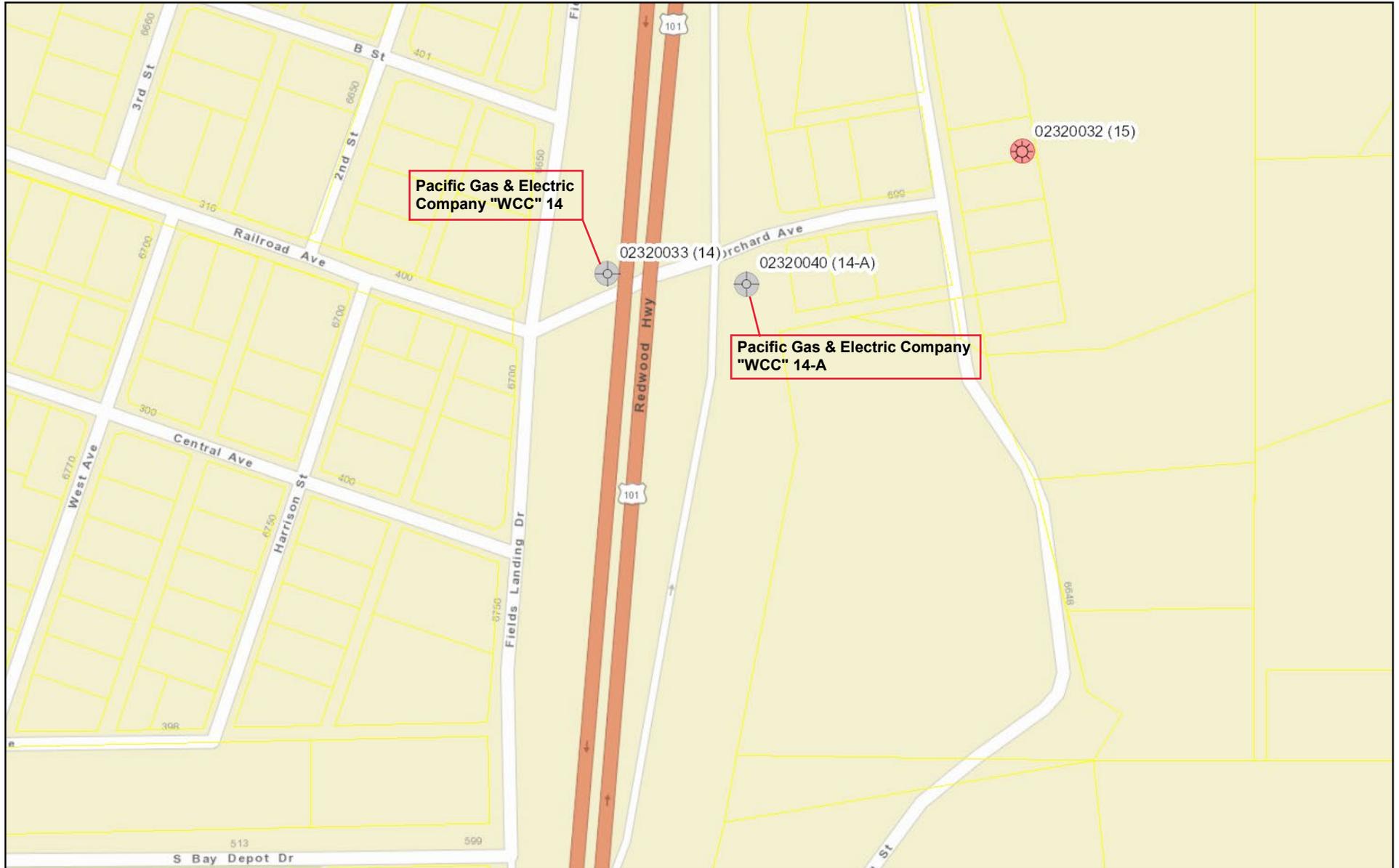
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Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand),

Well Locations in Fields Landing



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Well

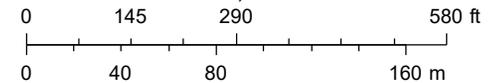


Plugged & Abandoned Gas Well



Cancelled Gas Well

1:3,162



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand),