

**LETTER NO. 8**

Dated: 2/28/01

Kenneth E. Trott  
Department of Conservation  
Office of Governmental and Environmental Relations  
[Memorandum]

**COMMENT 8.1**

The Department of Conservation's Division of Oil, Gas and Geothermal Resources (Division) has reviewed the DER for the referenced project. The Division supervises the drilling, maintenance, and plugging and abandonment of oil, gas and geothermal wells in California. We offer the following comments for your consideration.

Portions of the proposed project are located within the administrative boundaries of the Los Angeles Downtown oil field. There is one plugged and abandoned exploratory well within the project's Olympic East site. This well is identified on Division maps and records as Chevron U.S.A. Inc. "Salvation Army Corehole" I (API No. 037-06334). The well location is given as, "from centerline of 9th Street and Francisco Street, approximately 92 feet Easterly along 9th Street, thence 110 feet Southerly at right angles." The Division recommends that this well, and other wells within or in close proximity to project boundaries, be accurately plotted on future project maps.

We recommend that building over or in the proximity of a plugged and abandoned well be avoided if at all possible. If avoidance is not possible, please note that the State Oil and Gas Supervisor is authorized to order the reabandonment of previously plugged and abandoned wells to Division standards when construction over or in the proximity of wells could result in a hazard (Section 3208.1 of the Public Resources Code). If reabandonment is necessary, the cost of operations is the responsibility of the owner of the property upon which the structure will be located. Finally, if construction over an abandoned well is unavoidable, an adequate gas venting system should be placed over the well.

If 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 office must be contacted to obtain information on the requirements for, and approval to perform remedial operations.

The City's planning department should verify that final building plans have undergone Division review prior to the start of project construction. To assist in the review of building projects for

consistency with division standards, we have published an informational packet, Construction Project Site Review and Well Abandonment Procedure, that outlines the information a project developer must submit to the Division for review. Please contact the Division's Cypress district office for a copy of the site-review packet.

Thank you for the opportunity to comment on the DEIR. If you have questions on our comments, or require technical assistance or information on well safety and management, please contact David Sanchez at the Cypress district office, 5816 Corporate Avenue, Suite 200, Cypress, California 90630-4731; or, telephone (714) 616-6847. You may also call me at (916) 445-8733.

**RESPONSE 8.1**

This is the same letter as Letter No. 7 but was submitted under separate cover. Refer to Responses to Comments 7.1 through 7.6.