



DEPARTMENT OF CONSERVATION
STATE OF CALIFORNIA

April 7, 2001

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GRAY DAVIS
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Ms. Karen DeGannes, CEQA Project Manager
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Dear Ms. DeGannes:

Subject: Draft Initial Study/Mitigated Negative Declaration (MND) for
Decommissioning and Sale of Southern California Gas Company's
Montebello Gas Storage Facility – **SCH #2001031061**

The Department of Conservation's Division of Oil, Gas and Geothermal Resources (Division) has reviewed the MND 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.

Numerous references are made to the Division's involvement in gas monitoring and mitigation during the various project phases. Please review these references, and, as necessary, revise them to be consistent with the Division's authorities. Specifically, references to the Division in the MND's proposed mitigation measures should conform to the information contained in the following paragraph.

The Division does not have authority over general soil gas monitoring; only monitoring directly related to wells falls within the Division's authority. The Division is, however, available to meet with Southern California Gas (SCG) to review well monitoring procedures and data during the gas recovery and decommissioning phases (until the wells are plugged and abandoned properly). Following cessation of gas withdrawal operations, and well plugging and abandonment, further monitoring would be the responsibility of the landowner(s) and the cities of Montebello or Monterey Park. If, during post-abandonment project monitoring, anomalous gas measurements are recorded, they should be reported immediately to the Division. Upon investigation, the Division will determine whether well reabandonment is necessary.

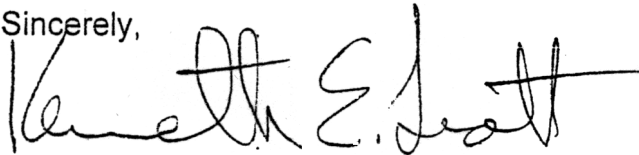
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The Division recommends that if structures are to be built over or in the proximity of plugged and abandoned wells, the wells are vented. (It should be noted that mitigation measure 4.6-1, which states, "...with[in] 3 ft of the casing," differs from the recommended standard well vent cone design parameter of "...within 2 ft of the casing.") Additionally, a gas leak test of the surface plug should be witnessed and approved by the Division immediately after plugging and abandonment, and prior to installation of a well vent system.

Finally, the reference to "DOGGR" in mitigation measure 4.6-18 and the paragraph titled *On-Going/ Post-Transfer Measures*, should be deleted.

Thank you for the opportunity to comment on the NOP. If you have questions on our comments, or require technical assistance or information, please contact David Sanchez at the Cypress district office: 5816 Corporate Avenue, Suite 200, Cypress, California 90630-4731; or, phone (714) 816-6847. If you have other questions you may contact me at (916) 445-8733.

Sincerely,



Kenneth E. Trott
Environmental Coordinator

cc: David Sanchez
Division of Oil, Gas and Geothermal Resources, Cypress

Linda Campion
Division of Oil, Gas and Geothermal Resources, Sacramento