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California
Department of Conservation
Geologic Energy Management Division

Gavin Newsom, Governor
Jennifer Lucchesi, Director
715 P Street, MS 1803
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December 3, 2025

<<***VIA EMAIL***>>

City of Suisun
Mr. Jim Bermudez
701 Civic Center Blvd.,
Suisun City, Sacramento 94585
Jbermudez@suisun.com

Assessor Parcel Number(s): Multiple
Property Owner(s): Multiple
Project Location Address: Region North of Highway 12, between Suisun City and Rio Vista

PROJECT TITLE: Suisun Expansion Project

Public Resources Code (PRC) section 3208.1 establishes re-abandonment responsibility when previously plugged and abandoned oil, gas or geothermal wells will be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near previously abandoned oil, gas, and geothermal wells.

The California Geologic Energy Management Division (CalGEM) has received the above-referenced project dated 11 November 2025. To assist local permitting agencies, property owners, and developers in making safe and practical land use decisions regarding potential development near oil, gas, or geothermal wells, CalGEM provides a table in the attached enclosure of the wells within the parcel boundary or in its vicinity, based on CalGEM's Well Finder database (https://maps.conservation.ca.gov/doggr/wellfinder/).

CalGEM categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access including, but not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, sidewalks, roadways, and decking at the landowner's expense if there is a need to access a well. Maintaining sufficient access is considered the ability for a well servicing unit and associated necessary equipment (consisting of well servicing rig, pumping equipment, pipe trailer) to reach a well from a public street or access way, solely over the parcel on which the well is located. A well servicing unit, 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. Impermeable barriers such asasphalt, concrete, and plastic may trap hazardous gases and liquids underneath and could create a safety hazard if built over a well that later develops a leak.

CalGEM recommends that any well for which access is impeded or built over, against CalGEM's advice, should be evaluated by a qualified petroleum professional for compliance with the statutory objectives of isolating all hydrocarbon-bearing strata; protecting underground and

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surface waters; prevention of subsequent damage to life, health, property, and other resources; and prevention of loss of oil, gas, or reservoir energy. CalGEM recommends that wells that do not meet these standards are abandoned or re-abandoned prior to construction. The well information can be accessed through CalGEM's Well Finder database mentioned above. PRC section 3208, subdivision (a), provides the primary statutory authority for CalGEM to oversee adequate abandonment of wells. Additionally, CalGEM has developed the regulatory guidance for operators to be followed during well abandonment, which are listed within California Code of Regulation, title 14 (CCR) section 1723 and associated sub-sections (for onshore wells), and section 1745 and associated sub-sections (for offshore wells).

There is no guarantee that a well abandoned in compliance with current Division requirements as prescribed by law will not start leaking in the future. Due to the inability to predict all subsurface conditions or changes, 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. CalGEM acknowledges wells plugged and abandoned to the most current Division requirements as prescribed by law have a lower probability of leaking in the future, however there is no guarantee that such abandoned wells will not leak.

CalGEM advises that all wells identified on the development parcel prior to, or during, development activities be tested for liquid and gas leakage. Surveyed locations in Latitude and Longitude, NAD 83 decimal format, and leak testing results should be provided to CalGEM. CalGEM expects any wells found leaking to be reported to CalGEM immediately.

PRC section 3208.1 gives CalGEM the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for re-abandonment as:

1. The property owner - If the well was plugged and abandoned in conformance with Division requirements at the time of abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.

2. The person or entity causing construction over or near the well - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be re-abandoned, or to follow the advice of the supervisor or district deputy not to undertake construction that impedes access, then the person or entity causing the construction over or near the well shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.

3. The party or parties responsible for disturbing the integrity of the abandonment - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the re-abandonment.

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Should any wells require abandonment or re-abandonment, the responsible party must submit a Notice of Intention (NOI) to CalGEM through WellSTAR. The NOI form can be accessed in the 'Plugging and Abandonment' section of the following link: https://www.conservation.ca.gov/calgem/for_operators.

No well work may be performed on any oil, gas, or geothermal well without written approval from CalGEM. Well work requiring approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other re-abandonment work. CalGEM also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR section 1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet below the surface of the ground. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this regulation, a permit from CalGEM is required before work can start.

CalGEM makes the following additional recommendations to the local permitting agency, property owner, and developer:

1. To ensure that present and future property owners are aware of (a) the existence of all wells located on the property, and (b) potentially significant issues associated with any improvements near oil or gas wells, CalGEM recommends that information regarding the below identified well(s), and any other 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.

2. CalGEM recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.

As indicated in PRC section 3106, CalGEM has statutory authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil, gas, and geothermal deposits; and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to CalGEM's authority to order work on wells pursuant to PRC sections 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC sections 3236, 3236.5, and 3359 for violations within CalGEM's jurisdictional authority. CalGEM does not regulate grading, excavations, or other land use issues.

Should you have any questions, or if any wells are encountered that were not part of this letter, contact CalGEM at *916-322-1110* or via email at *CalGEMNorthern@conservation.ca.gov*.

Sincerely,

May Soe

May Soe
Supervising Oil & Gas Engineer – Northern District

cc: The State Clearinghouse, state.clearinghouse@opr.ca.gov
Enclosure

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Enclosure: The wells listed below are reported to be located within and nearby the parcel boundaries and may have future access impeded.

API No.	Well Name
0409500001	BFI-Buttes 1-17
0409500440	Petersen 1
0409520068	U.S.A.A.R. Blodgett 1
0409520096	General Crude-Dow-Brann 1
0409520224	Bennett et al 1
0409520423	Collins-Hatch 1
0409520601	Peterson 1-32
0409520604	Chevron-Emigh 1-2
0409520619	Depco-Collins 1-1
0409520713	Hagan 1-12
0409520718	Robinson 1-4
0409520785	Hagan 7-1
0409520792	Peterson 2-10
0409520793	Hagan 2-12
0409520830	Kroutch 16-3
0409521048	Rueben R. Petersen 1
0409521109	MDHF 1-36
0409521200	Sage 9
0409521201	BD 4
0409521246	Petersen 32-1
0409500050	McCormack Estate 1
0409500051	McCormack Estate 2
0409520394	Souza 1
0409520491	Barnes 1-3
0409520552	Barnes 1-33
0409520625	Barnes 2-3
0409520626	Emigh 3
0409520632	Barnes 3-33
0409520612	Emigh 2
0409520614	Peterson 1A-32
0409520594	Barnes 2-33
0409520590	Emigh 1
0409520656	Emigh 4
0409520662	Emigh 6
0409520691	Emigh 7
0409520687	Lambie 2-4
0409520155	Barnes 1
0409520089	Mobil-Signal 2
0409520073	Mobil-Signal 1
0409520348	Lambie 1-4

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0409500058	Trojan Powder Co. 1
0409520029	Emigh 1
0409520016	Lambie 1
0409500377	Lambie 9-2
0409520778	Barnes 3-3
0409520779	MBH 2-3
0409520780	Souza 11-2
0409520764	Chevron-Emigh 3-2
0409520765	MBH 1-4
0409520770	MBH 1-10
0409520757	MBH 1-3
0409520759	Federal 3-3
0409520762	Souza 11-1
0409520753	Federal 3-2
0409520754	Emigh 3-1
0409520748	Chevron-Emigh 2-2
0409520741	Barnes 1-33X
0409520737	Emigh 8
0409520727	Federal 3-1
0409520706	Emigh 5
0409520807	Emigh 1-4
0409520787	C.B.M. - Emigh 1-34
0409520985	Emigh-WFB 1-4
0409520977	Lambie-Felenco 3-4
0409521061	Emigh 4-1
0409521034	Emigh 2-1
0409521053	Emigh 35-2
0409521046	Emigh 35-1
0409521027	North Denverton Creek 1-33
0409521111	Emigh 35-4
0409521107	Emigh 35-3
0409521081	Emigh 3-1
0409521082	Cygnus 1
0409521128	Emigh 35-5
0409521130	Emigh 34-3
0409521131	Emigh 34-2
0409521267	Lambie Ranch 1-10
0409521320	Morning Star 32-1
0409520746	Barsotti 10-1
0409520728	Kroutch 16-1
0409520801	Williams-Martin 15-1
0409520817	Kroutch 16-2
0409520811	McCormack Road 1-9
0409520798	Kroutch 16-1
0409520825	KBW 10-2
0409520820	KBW Ranch 10-1

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0409520821	Azevedo 27-3
0409520822	McCormack Rd. 1-4
0409520864	Canright Road 1-9
0409520868	Canright Road 2-9
0409520931	Kroutch 16-1
0409521114	Carole-Lynn 1-15
0409521091	Kroutch 2-16
0409521098	CNGC Pac 3-2
0409521261	Anderson 9-1
0409521259	Carole-Lynn 2-15
0409520403	McCormack 1-9
0409520389	Bennett 1-9
0409520469	Avery-Wellman 21-15-1
0409520459	Chevron-Hamilton 14-10-1
0409520553	Sanchez Farms 1-15
0409520558	McCormack 34-9-1
0409520551	Williams-Happe 13-15-1
0409520694	Kroutch 43-16-1
0409520664	Avery-Wellman 22-15-3
0409520573	Avery-Wellman 12-15-2
0409520608	Kroutch 41-16-2
0409520167	AH-Kirby 1
0409500124	Robinson 1
0409500434	A. Kroutch 1
0409521016	Emigh 34-1
0409520872	KBW Ranch 10-2
0409521322	McCormack Ranch 1-4
0409521102	Cygnus 2
0409521198	Emigh 35-6