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April 16, 2025

Honorable Members of the City Council

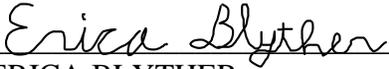
**SUBJECT: CF# 24-0585 – ORPHANED OIL AND GAS WELLS/  
REMEDICATION AND CLOSURE / FEDERAL FUNDING**

This report covers Council Motion # 24-0585 (McOsker-Soto-Martínez) Orphaned Oil and Gas Wells / Remediation and Closure / Federal Funding instructing the City's Office of Petroleum and Natural Gas Administration and Safety (OPNGAS) to report on plans to proactively seek out the federal funding and ways that the City is addressing requirements or steps that need to be taken to receive the federal funding, as well as any infrastructure or personnel that is necessary to deploy the federal funding.

An important note is that the federal funding was structured to flow to the states and then to local municipalities, not directly to the municipalities bypassing the states. Due to this, OPNGAS has been working collaboratively with the state of California since 2021 to obtain the funds for orphan wells closure in the City of Los Angeles. However, to comply with the spirit of Council's direction to the City's Petroleum Administrator, this report is being prepared.

If you have any questions, please contact me at (213) 978-2679 or via email at [Erica.Blyther@lacity.org](mailto:Erica.Blyther@lacity.org).

Submitted by:

  
ERICA BLYTHER  
Petroleum Administrator

Courtesy Copy:

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CITY OF LOS ANGELES  
BOARD OF PUBLIC WORKS  
OFFICE OF PETROLEUM & NATURAL GAS ADMINISTRATION & SAFETY

A report on Council Motion 24-0585

ORPHANED OIL AND GAS WELLS

REMEDICATION AND CLOSURE

FEDERAL FUNDING

April 16, 2025

Prepared by:

Erica Blyther, Petroleum Administrator

Handwritten signature of Erica Blyther in cursive script, positioned above a horizontal line.

ERICA BLYTHER, PETROLEUM ADMINISTRATOR  
Board of Public Works

## **SECTION 1. INTRODUCTION**

This report covers Council Motion # 24-0585 (McOsker-Soto-Martínez) Orphaned Oil and Gas Wells / Remediation and Closure / Federal Funding instructing the City's Office of Petroleum and Natural Gas Administration and Safety (OPNGAS) to report on plans to proactively seek out the federal funding and ways that the City is addressing requirements or steps that need to be taken to receive the federal funding, as well as any infrastructure or personnel that is necessary to deploy the federal funding.

An important note is that the federal funding was structured to flow to the states and then to local municipalities, not directly to the municipalities bypassing the states. Due to this, the Office of Petroleum and Natural Gas Administration has been working collaboratively with the state of California since 2021 to obtain Federal funds for closing orphan wells in the City of Los Angeles. However, to comply with the spirit of Council's direction to the City's Petroleum Administrator, this report is being prepared.

## **SECTION 2. OIL TERMS/DEFINITIONS**

**CalGEM:** Effective January 1, 2020, California's regulatory entity for oil, gas, and geothermal production has an updated focus and a new name: The California Geologic Energy Management Division (CalGEM). Housed within the California Department of Conservation, CalGEM replaces the Division of Oil, Gas, and Geothermal Resources (DOGGR). This change came as a result of Assembly Bill 1057 (Assemblymember Limon, D-Santa Barbara), which was signed by Governor Newsom on October 12, 2019.

The division began in 1915, when the focus was on the development and production of petroleum resources. The mission has since evolved, and protection of public health, safety, and the environment are heightened priorities. In addition, CalGEM is also helping to guide the broader transition to a low-carbon future.

**Oil and Gas:** A well producing Oil and Gas (in the LA area: water, oil and gas are produced from wells)

**Waterflood:** In drill sites or extraction sites there are also injection wells. Injection wells are used for waterflood, steamflood, cyclic steam, and water disposal. These wells are used to safely dispose of the salt and fresh water produced with oil and gas and are used to increase oil and gas production. About 15 times more water than oil is produced from California's oil and gas fields. Drill sites have both oil and injection (or injector) well types. California Geologic Energy Management Division (CalGEM, formerly DOGGR) engineers monitor all wells to ensure that they are operated and closed properly.

**Unknown:** Unknown wells are wells with little to no information and are from the pre-1976 era of wells drilled within the City.

**Plugged:** A plugged well has been abandoned and plugged/permanently sealed with a cement plug in compliance with current regulations. (Note: Some legacy oil wells that were previously abandoned may need to be re-abandoned in order to comply with current regulations.) Also sometimes called “Capped”, “Sealed”, “Closed” or “Abandoned”.

**Abandonment:** Permanent closure and sealing of a well by placing cement and/or other approved materials in the wellbore or casing, as specified in California laws or regulations.

**Idle:** An idle well is an oil well that has not been used for production or injection for six consecutive months in two or more years, but is capable of being reactivated. It has not been plugged or abandoned. **\*Note “Idle”** is a term from CalGEM. The LA City Fire Department has a slightly different nomenclature and definition from the fire code **“Non-Operating Oil wells”** 5706.3.16.1 Non-Operating oil wells. Any oil well which has not been secured in compliance with the provisions of Section 5706.3.15, or which, for a continuous period of 1 year has not been in operation or has ceased to produce petroleum or natural gas shall either be abandoned or reactivated within 30 days after notice has been given by the Chief.

**Orphan Wells:** An idle well that has no operator or other responsible party to pay for its costs becomes an “idle-deserted” or “orphan” well, which is then the responsibility of the state to plug and abandon. (PRC §3251, §3206.3). Orphan wells and facilities have no responsible, solvent operator to maintain, repair, or plug and abandon them. These wells can leak oil, emit air emissions, including methane (a potent greenhouse gas) and pose physical hazards, potentially threatening public health, safety, and the environment. In the absence of a solvent responsible party, the state, through CalGEM, must assume the responsibility of eliminating risks and hazards associated with these wells and facilities. There are currently approximately 5,300 orphan or likely orphan wells in California.

Evidence of desertion includes:

- An idle well with unpaid assessments (typically 3 years) or with failed pipeline assessments, without any appeals in a three-month period,
- A well which has not been operated and/or maintained in accordance with regulations,
- An Idle well without an Idle well management plan

## **SECTION 4. RANKING OF ORPHAN WELLS**

There are approximately 5,300 (actually counted at 5,296) orphan wells statewide. CalGEM has categorized these orphan wells into five tiers 1-5, representing five segments under the normal distribution, with tier 1 representing the highest risk wells. CalEnviroScreen 4.0 and SB535 criteria were used to identify wells that were the highest priority and will benefit the most vulnerable communities.

A portion of the state's orphan wells (1,460 of the 5,296 wells) are categorized as "Inaccessible" (i.e. buried under buildings, etc.). CalGEM field staff was deployed to locate the orphan wells and if the well was determined to be inaccessible, it was then categorized as "Inaccessible". CalGEM has stated that they will assess the reason for the well inaccessibility, whether any monitoring is needed of the well, and a plan for abandoning the well should it become accessible.

In the City of Los Angeles there are 994 orphan wells, of which 889 are categorized as "Inaccessible" leaving 105 available for Federal Infrastructure Investment and Jobs Act (IIJA) funds.

Of the remaining 105:

- 19 are categorized as Tier 1
- 72 are categorized as Tier 2
- 13 are categorized as Tier 3
- 1 is categorized as Plugged and Abandoned

## **SECTION 5. COSTS**

Per recent CalGEM Data: "Between 2017-2020 the State abandoned four orphaned wells in Los Angeles County for a total cost of \$1,444,928." That averages out to **\$361,232/ well**.

Per the OPNGAS July 2019 Health Report, p.126

"The abandonment of an oil well in the Los Angeles Region can cost anywhere from \$50,000 to \$500,000 per well according to news reports from CIPA. The two (2) wells recently abandoned on Firmin Street in the Echo Park area of the City cost the state about \$375,000.

Sixty-Five percent (65%) of active and idle wells are located within drill sites which should be on the lower end of the cost scale. The remaining wells will likely require higher abandonment costs due to their locations in difficult to access urban settings. Drill site well abandonments are estimated to cost **\$250,000** per well...Non-drill site wells are estimated to cost **\$375,000** per well..."

Drill site wells are closer, so there are economies of scale when deploying abandonment equipment. Older wells are also more expensive to abandon due to lack of recently functioning equipment, corrosion issues, and historic closure practices; i.e. closure practices in the past were not the engineered solutions of today (*See Attachment #1 1930s Practices and #2 Casing from a 1930 Unplugged Well*).

## **SECTION 6. FUNDING**

### **State Funding**

Currently, there are three (3) types of state funds available for Orphan Well remediation related work:

- 1) Oil, Gas and Geothermal Administrative Fund \$5 million per year (PRC 3258, Subd (a)) and Chapter 844, Statutes of 2022 (SB 1295, Limón) \$15 million over two years
- 2) The Hazardous and Idle-Deserted Well Abatement Fund funded by operator idle well fees and continually appropriated to CalGEM to plug and abandon wells to mitigate a hazardous or potentially hazardous condition; (*See Attachment #3 2025 CA Idle Well Fee Changes*) and
- 3) As part of the CA state budget a total of \$100 million from the State's General Fund was allocated over two years: \$50 million in the Budget Act of 2022 and \$50 million in the Budget Act of 2023 to plug and abandon orphan and deserted wells.

### **Federal Funding**

In addition, beginning in 2022, CalGEM began receiving an influx of new investment funding for orphan well and facilities remediation from Federal government sources. This funding source is explained in CalGEM's State Oil and Gas Well Expenditure Plan, released in October 2023.

([https://www.conservation.ca.gov/calgem/Documents/state\\_abandonment\\_expenditure\\_final.pdf](https://www.conservation.ca.gov/calgem/Documents/state_abandonment_expenditure_final.pdf))

#### *From the Plan:*

*The 2021 Federal Infrastructure Investment and Jobs Act (IIJA) included \$4.7 billion nationwide over a ten-year period for well plugging, remediation, and restoration. Funding for formula grants is distributed between states, based in part on state-specific numbers of oil and gas jobs (including jobs lost in the sector), the total number of orphaned wells, and the total cost estimated to plug and abandon those wells. California has been notified of eligibility to receive \$165.8 million in the first two phases of the program, with additional funding to be allocated in later phases. Restrictions on the use of the funding require states to use no more than 10% of the funds for administrative costs.*

*In August 2022, the US Department of the Interior (DOI) awarded California the maximum initial grant eligibility amount of \$25 million from the federal government's orphan well program authorized in the bipartisan Federal Infrastructure Investment and Jobs Act (IIJA). These funds are earmarked for CalGEM and available in the Federal grant financial allocation system; when invoices are received, the amount will be drawn down and transferred to California's Federal Trust Fund account within one to two days.*

*In July 2023, the US Dept. of Interior opened the application period for the first 25% of the \$140 million formula grant monies.*

*In May 2024, the US Dept. of Interior announced California will receive the first tranche of \$35 million. CalGEM will be applying for the next three tranches in upcoming years.*

The Federal Government had many requirements for states applying for the funding including developing an Orphan Well screening methodology, complying with Federal Native American/Tribal Consultations and Biological and Cultural surveys.

**An important note is that the Federal funding was structured to flow to the states and then to local municipalities, not directly to the local municipalities bypassing the states.** Due to this, the Office of Petroleum and Natural Gas Administration has been working collaboratively with the state of California since 2021 to obtain Federal funds for closing orphan wells in the City of Los Angeles. The Office of Petroleum and Natural Gas Administration has sent many forms of communication (including official letters and emails) and participated in numerous meetings to obtain the funds for closing orphan wells in the City of Los Angeles.

## **SECTION 7. OPNGAS WORKING TO SEEK OUT FUNDING**

The Office of Petroleum and Natural Gas Administration has worked with CalGEM to evaluate their screening methodology, the output of the screening methodology and to comment on annual CalGEM funding plans. See attachments documenting some of the communication to CalGEM from 2022 on (*Attachment #4, 5 and 6*) as well as the timeline below.

### **Brief Timeline of LA City Orphan Well Activities**

#### **June 2016**

CalGEM (then DOOGR), AQMD, and Council District 1 worked to close 2 orphan wells on Firmin Street expending the entirety of the State's Orphan well budget for the year.

(<https://www.desmog.com/2020/02/13/los-angeles-vista-hermosa-cap-orphan-oil-wells-leaking-doggr/>)

#### **July 2017**

Predecessor Uduak-Joe Ntuk, a consultant for LA City, worked with CalGEM (then DOOGR) on lists of Orphan Wells in LA City. Created a list of 56 orphan wells.

**November 30, 2021**

OPNGAS attended CalGEM Oil and Gas State Abandonment Planning Workshop on Screening Criteria and sites of interest

**March 24, 2022**

OPNGAS attended CalGEM Oil and Gas State Abandonment Planning Workshop

**September 2022**

OPNGAS attended CalGEM public meeting discussing the comment period on the draft prioritization method

**October 07, 2022**

OPNGAS submitted comments on CalGEM's Orphan Well screening methodology

**February 29, 2023**

OPNGAS attended a CalGEM meeting with Southern District and local municipalities on Orphan Wells

**August 10, 2023**

OPNGAS submitted comments on CalGEM Draft Expenditure Plan Year 1

**August 15, 2024**

OPNGAS submitted comments on CalGEM Draft Expenditure Plan Year 2

**September 24, 2024**

OPNGAS attended Public Webinar on the Upcoming State Abandonment projects

**March 27, 2025**

OPNGAS attended Local Government Oil & Gas Working Group featuring CalGEM and asked about changes to Federal Funding

In addition, in 2021, the Petroleum Administrator coordinated with Federal, state and local government officials including Council offices and the then Mayor as well as local stakeholders for an in person LA area oil well tour event for Department of Interior Secretary Deb Haaland in support of the Infrastructure Investment and Jobs Act (IIJA). This tour occurred on December 10, 2021 in Council District 1, at Vista Hermosa Park near the first successful oil well in the Los Angeles City Oil Field (modern day Echo Park) drilled by Edward Doheny and Charles Canfield in 1892. This tour showcased the area that had been an oil field and showed how IIJA funds could be used to turn former drill sites into parks as well as other problem oil wells in LA City (*See Attachment# 7 Echo Park Tour, #8 Deb Haaland Speaking Event December 10, 2021, #9 Early Vista Hermosa and #10 Canoga Park Wells*).

In May 17, 2024, the Office of Petroleum and Natural Gas Administration was invited to join Secretary of the Interior Deb Haaland and her team for an in person legacy pollution briefing focused on Bipartisan Infrastructure Law (BIL) funding related to orphaned well plugging and remediation. The briefing included representatives from federal and state agencies, organized labor, community stakeholders and advocates and serve as an opportunity to connect people and organizations and to hear from participants and the community. A representative from the Office of Petroleum and Natural Gas Administration attended this important meeting.

In June 2024 the Office of Petroleum and Natural Gas Administration coordinated a meeting with representatives from CD1, the Mayor's Office and CalGEM representatives to discuss Orphan Well concerns including Orphan Well Abandonment priorities for the next fiscal years as CD1 holds 617 of the 994 LA City Orphan wells.

In August 2024, the Office of Petroleum and Natural Gas Administration commented on the CalGEM Orphan Well Abandonment Draft Expenditure Year 2 Plan (*See Attachment #6*).

This comment letter included a list of wells from the CD15 Harbor Gateway North Neighborhood Council. CalGEM had previously stated that they will not use Orphan well funds to remediate inaccessible wells, but some of the wells listed as "inaccessible" appear to be accessible, (i.e. in sidewalks, front yards or backyards). CalGEM was asked to verify that ground truthing had been performed on these wells.

In addition, CalGEM was asked to continue to expand the list to apply for the full amount of funding available to the state, i.e. the \$52.8 million announced in the \$775 Million Federal Investing in America Agenda for States to Plug Orphaned Oil and Gas Wells announced on August 14, 2024.

In summary the Office of Petroleum and Natural Gas Administration is actively engaged in obtaining Federal Funding to close Orphan wells and works diligently with all partners to ensure whatever qualifying wells identified by stakeholders are prioritized.

CalGEM has stated that they are happy to follow up on specific priority orphan wells identified by the City of Los Angeles. Any additional feedback on priorities or information on specific sites is viewed as helpful.

## **SECTION 8. PRIORITY WELLS**

In the CalGEM Orphan Well Abandonment Expenditure Year 1 Plan, 21 of the 25 wells to be properly abandoned in the City of Los Angeles are in CD1 at the former AllenCo Drill site. The other 4 orphan wells identified are in Canoga Park.

### **Canoga Park Wells**

The first set of wells identified by the Department of Conservation (DOC)/CalGEM in LA City include 4 wells in Canoga Park. CalGEM has stated that Tribal representatives will be notified if a CEQA Initial Study is required for the plugging and abandonment process. This is especially important in the Canoga Park area in El Escorpión Park where the Knapp 1 and Knapp 3 wells are located and there are tribal cultural resources including a Lime Kiln constructed between the late eighteenth and early nineteenth centuries by native Chumash people.

The Canoga Park wells have been on the City's radar for a while and in fact CalGEM's photos of these wells and leaks were instrumental in showing Interior Secretary Deb Haaland on her December 2021 LA City visit, how the Infrastructure Investment and Jobs Act (IIJA) funds could benefit the City and the State. (See Attachment #10)

#### ***From CalGEM's Orphan Well Expenditure Plan 2023(p.28 & 30):***

*Ca Cache Oil Co., 1 well in Los Angeles*

*The Cache Oil Company's Knapp 4-1 well has been idle for many years and has had a history of leaks. The well is near a neighborhood in the Canoga Park section of Los Angeles. It is also near a recreational area frequented by many. The well was previously abandoned but based on questions about the integrity of the previous abandonment CalGEM issued an order on September 2, 2021, to reabandon the well. That order became final on October 13, 2021, and CalGEM declared the well orphan on March 10, 2022.*

*Canoga Oil Company, 3 wells in Los Angeles*

*These three wells are near a neighborhood in the Canoga Park section of Los Angeles. They are also near a recreational area frequented by many. The wells have been idle for many years and one well (Knapp 1) has a history of leaks and is located near homes. Because of the history of leaks and its close proximity to homes, Knapp 1 has been declared hazardous.*

*Canoga Oil Co. was issued an order to plug and abandon or reabandon its wells on October 4, 2021, which became final on October 19, 2021. CalGEM declared the wells orphan on March 10, 2022. CalGEM proposes abandoning or reabandoning all wells in the Canoga Park field that are currently not buried, which includes these three operated by Canoga Oil Co., as well as one well belonging to Frank Knapp (Liu, Cheng, and Lin), and one well belonging to Cache Oil Co. If the remaining five wells known to be currently buried in the Canoga Park field are located, then CalGEM may also abandon those as well.*

*Frank Knapp and Liu, Cheng, and Lin, 1 well in Los Angeles*

*The Knapp 3 (Frank Knapp well has been idle for many years and has had a history of leaks. The well is near a neighborhood in the Canoga Park section of Los Angeles. It is also near a*

*recreational area frequented by many. Because of the leaking oil and close proximity to homes, the well has been declared hazardous.*

*CalGEM issued an order to plug and abandon the Knapp 3 well on October 25, 2019, which became final on November 11, 2019. CalGEM declared the well orphan on February 28, 2022. The operator has been cited for numerous violations including non-compliance with idle well fees, failure to provide monthly production data, failure to perform idle well testing, and failure to update agent information.*

### **AllenCo Wells**

The first set of wells identified by the Department of Conservation (DOC)/CalGEM in LA City include 21 wells in CD1 at the former AllenCo Drill site. Regarding the Allen Co wells, as noted in the plan, the community has long been concerned with these wells and the City is happy to have CalGEM support on closing them expeditiously.

### ***From CalGEM's Orphan Well Expenditure Plan 2023 (p.27):***

*AllenCo Energy, Inc., 21 wells and onsite tank facility in Los Angeles. This Southern District operator has 21 wells and an onsite tank facility located in Los Angeles, California in the Las Cienegas field, approximately 1000 feet west and 2000 feet south of where the 110 and 10 freeways intersect. The location is situated between Saint James Park to the south, residential properties to the north, and St. Vincent Elementary School approximately 800 feet to the southeast, and is located within an SB 535 Disadvantaged Community.*

*For the past decade, the City of Los Angeles, CalGEM, and other agencies have taken numerous enforcement and legal actions in response to concerns that AllenCo was in violation of California's oil and gas laws, public health, and safety laws, air and water quality protection laws, and fire and safety and odor regulations. The local community has also expressed serious concerns and has called for the clean-up of this site. In September 2019, CalGEM issued an order to AllenCo to depressurize the wells, with which AllenCo refused to comply. CalGEM hired a contractor to depressurize the wells, to help ensure the site remained safe for the community. In 2020, CalGEM also ordered AllenCo to permanently close its Saint James drill site.*

The State has engaged contractors to perform the plugging and abandonment work and has created the following website where updates can be found:

<https://www.conservation.ca.gov/calgem/Pages/State-Abandonments.aspx>

On December 3, 2024 the project was approved by the Department of the Interior (DOI) and work began to abandon all 21 wells at the AllenCo site.

December 12, 2024: Starting in late December 2024, the Department of Conservation (DOC) and contractor, Driltek, will permanently close 20 oil and gas wells at the Allen Co Energy "Saint James" drill site in Los Angeles. This plan provides community members with essential

information about work schedules, safety measures, and emergency contacts. After completion, all oil and gas operation hazards will be removed from the site (*Latest website update*).

Updates on the project are also provided at the monthly AllenCo stakeholder meetings coordinated by the LA County Public Health Department which the Office of Petroleum has regularly attended since 2018. The project is forecast to be complete sometime in April 2026.

## **SECTION 9. CONCLUSION**

The stated funding process from the Federal Infrastructure Investment and Jobs Act (IIJA) is as follows “These funds are earmarked for CalGEM and available in the Federal grant financial allocation system; when invoices are received, the amount will be drawn down and transferred to California’s Federal Trust Fund account within one to two days.”

In these times of Federal transition, CalGEM has had some initial problems getting refunded. However, in happy news, at the March 5, 2025 Monthly AllenCo Stakeholder meeting, Jacob Roper of CalGEM gave an update on the work to permanently plug the 21 wells at AllenCo noting that CalGEM has been receiving Federal Funding and is expecting to receive future reimbursement. Jacob stated that CalGEM just received \$1 million on Friday February 28, 2025.

In a follow-up conversation in March 2025 with Robert Schaaf, the CalGEM staff member overseeing the State Well abandonments, he stated that Doug Burgum the new 55th Secretary of the Interior, had worked on crafting the initial IIJA funding and that CalGEM is optimistic refunds will continue.

As a back-up plan, CalGEM has mentioned the idea of using other state funding to complete the projects if necessary.

This concludes the review by the Office of Petroleum and Natural Gas Administration and Safety (OPNGAS).

Disclaimer: If the scope of this request had been broader or additional items requested for evaluation, then the findings may have been different. There may also be additional records that were not accessible or available for consideration in this report.

If you have any questions, please call me at (213) 978-2679 or via email at Erica.Blyther@lacity.org.

Courtesy Copy:

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Ted Jordan, City Attorney's Office

Tanea Ysaguirre, City Attorney's Office

Attachments

Attachment 1: 1930s Practices – Prepared by j. Daniel Arthur

Attachment 2: Casing from a 1930 Unplugged Well – Prepared by j. Daniel Arthur

Attachment 3: 2025 CA Idle Well Fee Changes

Attachment 4: OPNGAS Comment Letter October 7, 2022

Attachment 5: OPNGAS Comment Letter August 10, 2023

Attachment 6: OPNGAS Comment Letter August 15, 2024

Attachment 7: Echo Park Oil Well Tour December 10, 2021

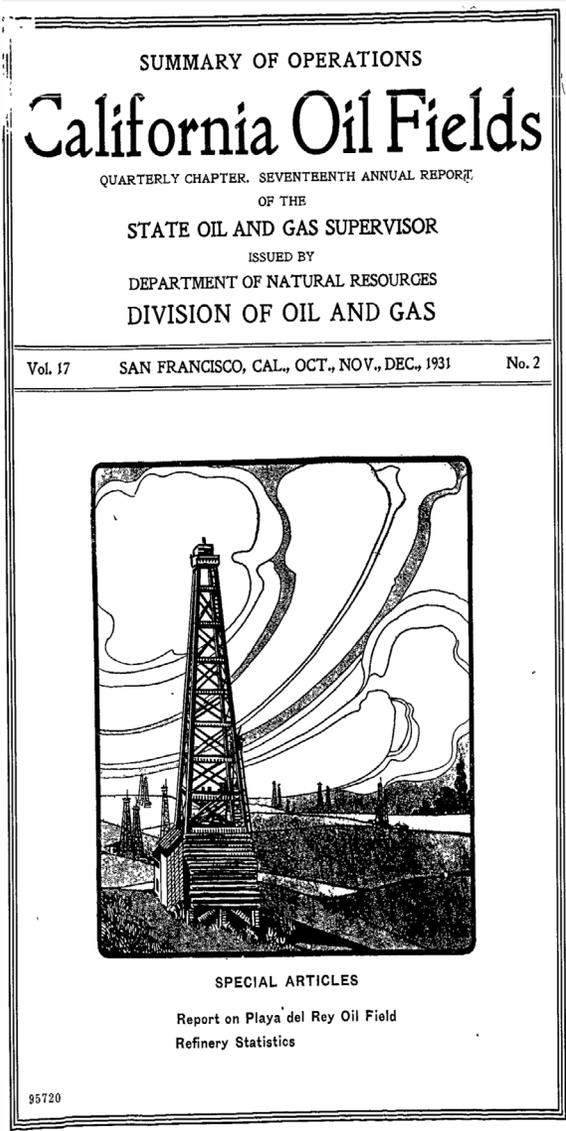
Attachment 8: Deb Haaland Speaking Event December 10, 2021

Attachment 9: Early Vista Hermosa in Council District 1

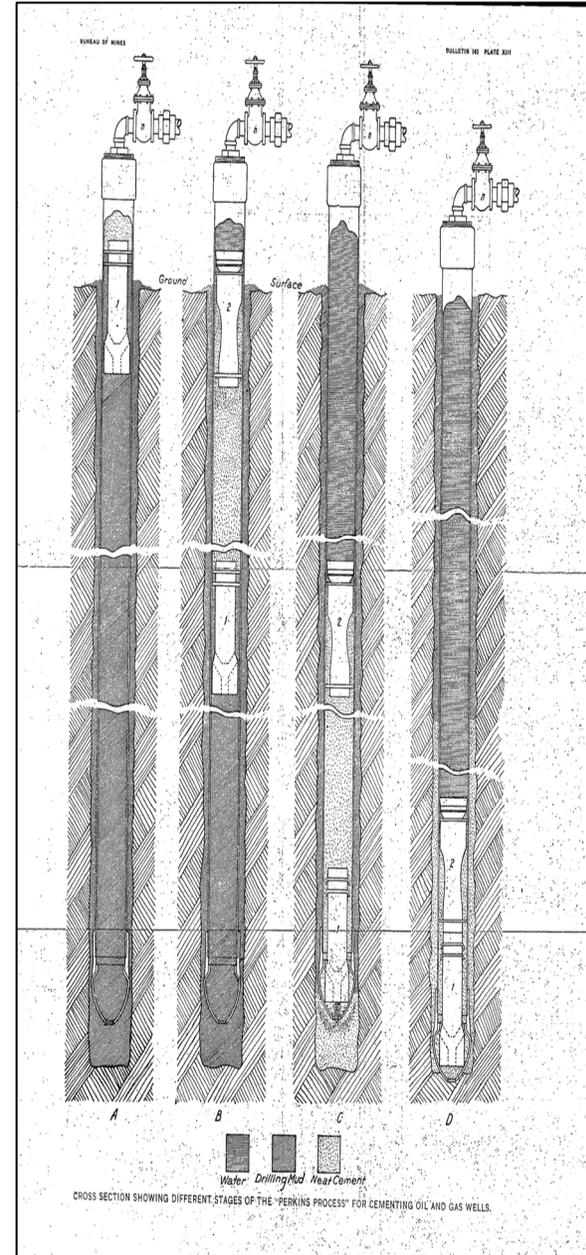
Attachment 10: Canoga Park Wells

**Attachment 1:  
1930s Practices  
Prepared by j. Daniel  
Arthur**

# 1930s Practices



Many wells throughout America were completed with Stove Pipe and even Wooden casings (see photo). Review of the 1931 publication of the state shows that SP casing was used not only in the Playa Del Rey field, but “throughout” California. In fact, many water shut off casings were not even cemented, but simply “Landed” as documented in the 1931 publication. Moreover, few wells in the 1930s had fully cemented annular spaces behind casing strings! A common cementing method used in the area was the “Perkins Method”, which is a pressure method and patented in the 1920s.



**Attachment 2:**  
**Casing from a 1930**  
**Unplugged Well**  
**Prepared by j. Daniel**  
**Arthur**

# ***Casing from a 1930 Unplugged Well***

The photos here show a casing retrieved from a well drilled in 1930 and abandoned after production hit economic limits. The casing shows severe corrosion after being exposed to groundwater since the time of abandonment. This is common to *\*ANY\** well plugging contractor experienced in plugging old wells!



**Attachment 3:**  
**2025 California Idle Well**  
**Fee Changes**

# Idle Well Changes in 2025



Years Idle	Previous Fee (\$)	New Fee (\$)
0 - 2.99	\$0	\$1,000
3 - 7.99	\$150	\$2,500
8 - 14.99	\$300	\$5,000
15 - 19.99	\$750	\$12,500
20+	\$1,500	\$22,500
<b>On and after January 1, 2029</b>		
20 - 24.99	N/A	\$22,500
25+	N/A	\$60,000

Idle Well Count	2019 - 2024	2025 - 2027	2028 - 2029	2030+
3,001+	6%	15%	18%	20%
1,251 - 3,000	6%	7%	10%	15%
251 - 1,250	5%	6%	8%	10%
0 - 250	4%	5%	6%	8%

[Assembly Bill 1866](#) (Hart, 2023-2024) made several changes to PRC section 3206

- Took effect January 1, 2025
- IWMP previously only long-term idle wells, now includes all idle wells
- Increased Fees
- Increased IWMP elimination rates
- Inaccessible idle wells now exempt from PRC section 3206 requirements

**Attachment 4:**  
**OPNGAS Comment Letter**  
**October 7, 2022**

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October 07, 2022

The CalGEM Public Transparency Office  
[CalGEMOrphanWells@conservation.ca.gov](mailto:CalGEMOrphanWells@conservation.ca.gov)

The City of Los Angeles Office of Petroleum and Natural Gas Administration and Safety (OPNGAS) is submitting this letter supporting CalGEM's Orphan Well Abandonment Program.

In 2016, per then DOGGR, in the City of Los Angeles there were 56 orphan wells visible at the surface. There were also 870 idle and buried wells, the vast majority of which were in the Los Angeles City field. The OPNGAS is very interested in how these will all be prioritized.

It is very beneficial that CalGEM has created an interactive GIS map to facilitate public engagement. It has been very interesting to note where Scenario 1 leads to different prioritization results than Scenario 2 and 3. It will be useful to review each case in depth as priorities are assigned and OPNGAS supports the incorporation of local government and public feedback in the screening process.

Methane leaks and the potential for leaks could be a useful factor in the prioritization process. The OPNGAS is excited about the opportunities that California Air Resources Board (CARB)'s new satellite data can provide in detecting methane leaks in California, once satellites are deployed in 2023. Leaks identified by satellites or other remote monitoring technology have the potential to be detected, pinpointed and repaired much more quickly. Hopefully this data can be incorporated into CalGEM's Orphan Well Abandonment Screening and Prioritization Methodology.

The OPNGAS looks forward to continued work with CalGEM to properly manage orphan wells in the City of Los Angeles to prevent impacts to the nearby communities.

Sincerely,

Erica Blyther  
Petroleum Administrator  
Office of Petroleum and Natural Gas Administration  
City of Los Angeles | Department of Public Works  
200 N. Spring Street, Rm 358 (MS 465)  
Los Angeles, CA 90012



**Attachment 5:**  
**OPNGAS Comment Letter**  
**August 10, 2023**

**BOARD OF PUBLIC WORKS  
MEMBERS**

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**M. TERESA VILLEGAS**  
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PRESIDENT PRO TEMPORE

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COMMISSIONER

# CITY OF LOS ANGELES

CALIFORNIA



**KAREN BASS**  
MAYOR

**OFFICE OF THE  
BOARD OF PUBLIC WORKS**

**DR. FERNANDO CAMPOS**  
EXECUTIVE OFFICER

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LOS ANGELES, CA 90012

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<http://bpw.lacity.org>

August 10, 2023

The CalGEM Public Transparency Office  
[CalGEMOrphanWells@conservation.ca.gov](mailto:CalGEMOrphanWells@conservation.ca.gov)

## **CalGEM Draft State Orphan Well Abandonment Expenditure Plan**

The City of Los Angeles Office of Petroleum and Natural Gas Administration and Safety (OPNGAS) is submitting this letter to comment on the CalGEM Draft State Orphan Well Abandonment Expenditure Plan. Thank you for the opportunity to review this expenditure plan. We truly appreciate the transparency and extensive details on all aspects of the expenditure plan.

We are glad that CalEnviroScreen 4.0 and SB535 criteria were used to identify wells that were the highest priority and will benefit the most vulnerable communities. Regarding the Allen Co wells, as noted in the plan, the community has long been concerned with these wells and we are happy to have CalGEM support on closing them expeditiously.

We are pleased with the workforce development plan for transitioning oil and gas workers as this closely aligns with the LA City LA County Just Transition Taskforce goals that the City has been working towards. The requirement to enter into a project labor agreement (PLA) for well abandonment work by January 1, 2028 is admirable. We recognize that the January 1, 2028 date is a statutory deadline set by SB 1295 that CalGEM must implement. However, we recommend that CalGEM work to identify a plan to implement this goal ahead of the deadline, especially as, per the attached Encumbrance Goal, the vast majority of the funds (~\$257.2 of the \$317.2 million) will be spent before January 2028. The LA Just Transition Task force would appreciate being involved in the effort for the California Workforce Development Board (CWDB) pilot workforce training program for displaced oil and gas workers in LA County.

We are happy that the habitat restoration will be tracked via metrics. We are also happy to note that the methane emissions will be tracked pre- and post- abandonment to quantify the real greenhouse gas impacts of sealing these wells. We are curious to see how CalGEM worked with the California Air Resources Board (CARB) on development of the pre- and post-methane monitoring requirements as that was not specifically described in the plan. In addition we would ask that the methane emissions monitoring data be made available to the community via a centralized portal or in partnership with local air resources boards similar to AQMD's efforts to monitor the methane levels at Aliso Canyon (<http://www.aqmd.gov/home/news-events/community-investigations/aliso-canyon-update/air-sampling/air-montoring-activities/continuous-methane-monitoring-data>).



August 10, 2023

Page 2 of 2

We are glad to see that Tribal representatives will be notified if a CEQA Initial Study is required for the plugging and abandonment process. This is especially important in the Canoga Park area in El Escorpión Park where the Knapp 1 and Knapp 3 wells are located and there are tribal cultural resources including a Lime Kiln constructed between the late eighteenth and early nineteenth centuries by native Chumash people.

The Canoga Park wells have been on the City's radar for a while and in fact CalGEM's photos of these wells and leaks were instrumental in showing Interior Secretary Deb Haaland on her December 2021 LA City visit, how the Infrastructure Investment and Jobs Act (IIJA) funds could benefit the City and the State.

The City is looking forward to future annual updates to the list of prioritized wells and continuing to work with CalGEM as a partner. The City plans to engage in discussions to identify wells that are priorities for local communities and will continue to add to the project list.

Sincerely,

A handwritten signature in cursive script that reads "Erica Blyther".

Erica Blyther  
Petroleum Administrator  
Office of Petroleum and Natural Gas Administration  
City of Los Angeles | Department of Public Works  
200 N. Spring Street, Rm 358 (MS 465)  
Los Angeles, CA 90012

**Attachment 6:**  
**OPNGAS Comment Letter**  
**August 15, 2024**

**BOARD OF PUBLIC WORKS  
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COMMISSIONER

# CITY OF LOS ANGELES

CALIFORNIA



**KAREN BASS**  
MAYOR

**OFFICE OF THE  
BOARD OF PUBLIC WORKS**

**TJ KNIGHT**  
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August 15, 2024

The CalGEM Public Transparency Office  
[CalGEMOrphanWells@conservation.ca.gov](mailto:CalGEMOrphanWells@conservation.ca.gov)

### **CalGEM Draft Year 2 State Orphan Well Abandonment Expenditure Plan**

The City of Los Angeles Office of Petroleum and Natural Gas Administration and Safety (OPNGAS) is submitting this letter to comment on the CalGEM Year 2 Draft State Orphan Well Abandonment Expenditure Plan. Thank you for the opportunity to review this expenditure plan. We truly appreciate the transparency and extensive details on all aspects of the expenditure plan.

The City of Los Angeles has approximately 105 accessible Orphan wells that are within 50 feet of a sensitive receptor. We would like these wells to be Prioritized for proper plugging and abandonment.

In addition, we have a list of wells from our CD15 Harbor Gateway North Neighborhood Council. We understand that some wells previously categorized as "Plugged" or "Buried" have now been changed to "Idle" in WellStar. In cross referencing WellStar/WellFinder and the CalGEM Orphan Well Screening Prioritization, it appears that CalGEM has considered all 8 for the Orphan well funding, indicating that they are not truly "Idle" i.e. under an idle well management plan.

CalGEM has previously stated that they will not use Orphan well funds to remediate inaccessible wells, so the designation is very important. The CalGEM Orphan Well Screening Prioritization shows 6 of the 8 as inaccessible, but in looking at WellStar/WellFinder, some of the wells listed as "inaccessible" appear to be accessible, (i.e. in sidewalks, front yards or backyards). We'd like to ask CalGEM to verify that ground truthing has been performed on these wells.

API Number	WellStar/WellFinder Status	Orphan Well Screening Prioritization Status	Notes:
API 0403713640	Idle	Tier 2	Please add to Year 2 priorities
API 0403713623	Idle	Inaccessible	Looks like a sidewalk. Can this be ground truthed?
API 0403713624	Idle	Inaccessible	Looks like a backyard. Can this be ground truthed?
API 0403713569	Idle	Tier 2	Please add to Year 2 priorities
API 0403713588	Idle	Inaccessible	Looks like a front yard. Can this be ground truthed?
API 0403713578	Idle	Inaccessible	May be inaccessible
API 0403714404	Idle	Inaccessible	May be inaccessible
API 0403714384	Idle	Inaccessible	Looks like a front yard. Can this be ground truthed?



We are glad that CalEnviroScreen 4.0 and SB535 criteria were used to identify wells that were the highest priority and will benefit the most vulnerable communities. Regarding the Allen Co wells, the community has long been concerned with these wells and we are happy to have CalGEM support on closing them expeditiously. Thank you for the updates on the well abandonment process occurring at that Year 1 site.

We would ask CalGEM to continue to expand the list to apply for the full amount of funding available to the state, i.e. the \$52.8 million announced in the \$775 Million Federal Investing in America Agenda for States to Plug Orphaned Oil and Gas Wells announced on August 14, 2024.

The City is looking forward to future annual updates to the list of prioritized wells and continuing to work with CalGEM as a partner. The City plans to engage in discussions to identify wells that are priorities for local communities and will continue to add to the project list.

Sincerely,



Erica Blyther  
Petroleum Administrator  
Office of Petroleum and Natural Gas Administration  
City of Los Angeles | Department of Public Works  
200 N. Spring Street, Rm 358 (MS 465)  
Los Angeles, CA 90012

**Attachment 7:**  
**Echo Park Oil Well Tour**  
**December 10, 2021**

Petroleum Administrator coordinated with Federal, state and local government officials including Council offices and the Mayor for an LA area oil well tour event for Department of Interior Secretary Deb Haaland in support of the Infrastructure Investment and Jobs Act (IIJA).



From Left to Right:  
Erica Blyther- *LA City Petroleum Administrator*  
Lauren Faber  
O'Connor- *Chief Sustainability Officer*  
Wendy Carrillo- *Assemblywoman District 51*  
Eric Garcetti- *Mayor of Los Angeles*  
Deb Haaland- *Secretary of the Department of Interior.*  
CM Gil Cedillo- *Councilmember Council District 1 Community Representatives*  
Danny Luna  
and Rosalinda Morales

**Secretary Deb Haaland Echo Park Oil Well Tour December 10, 2021- Firman Street**

**Attachment 8:**  
**DOI Secretary Deb Haaland**  
**Speaking Event December**  
**10, 2021**

From Left to Right-  
Erica Blyther- *LA City Petroleum Administrator*  
Uduak-Joe Ntuk- *State Oil & Gas Supervisor*  
Deb Haaland- *Secretary of the Department of Interior*  
Gil Cedillo- *Councilmember Council District 1*  
Mitch O'Farrell- *Councilmember Council District 13*  
Eric Garcetti- *Mayor of Los Angeles*  
Wendy Carrillo- *Assemblywoman District 51*



Vista Hermosa Park  
Developed in  
collaboration with the Los  
Angeles Unified School  
District and the City of  
Los Angeles, Vista  
Hermosa is the first public  
park built in this densely  
populated area in more  
than a hundred years.  
There were idle wells  
around this site that had  
to be remediated in order  
to complete the project.  
Site dedicated July 2008.  
(<https://mrca.ca.gov/wp-content/uploads/2018/02/Vista-Hermosa-Natural-Park.pdf>)

**Secretary Deb Haaland Speaking Event at Vista Hermosa Park, December 10, 2021**

**Attachment 9:  
Early Vista Hermosa in  
Council District 1**



Vista Hermosa  
Park/Echo Park in  
1900s

California - Los Angeles - Oil wells, First St and Edgeware Road ca.1890-1920  
Photo from Seaver Center for Western History Research, Los Angeles County Museum of Natural History.

**Attachment 10:**  
**Canoga Park Wells**

# Canoga Park Wells in El Escorpión Park



June 3, 2021 at 7:00:45 AM

Knapp 3 (Frank Knapp), API # 037-00494, El Escorpión Park, Photo by CalGEM



June 3, 2021 at 7:08:59 AM

Knapp 1, API # 037-01161, El Escorpión Park Photo by CalGEM