



**NOTICE TO OPERATORS  
2025-03**

April 11, 2025

**REGULATORY REQUIREMENTS FOR OPERATOR COMPLIANCE WITH  
PUBLIC RESOURCES CODE, SECTION 3285**

The California Geologic Energy Management Division (CalGEM) is issuing this notice to clarify certain requirements of Public Resources Code (PRC) section 3285 and associated California Code of Regulations, title 14 (CCR), sections 1765.6, 1765.7, 1765.8 and 1765.9.

All operators must submit an annual sensitive receptor inventory and map by July 1, 2025, and annually thereafter, in accordance with requirements in PRC section 3285(a) and (b), and CCR section 1765.6. Each operator must report all wellhead(s), proposed wellhead(s), and production facilities operated in a field.

Wellheads and production facilities in a health protection zone (HPZ) are reported according to CCR sections 1765.6(a)(1) and (a)(2), 1765.7 and 1765.8.

Wellheads and production facilities outside an HPZ are reported according to CCR sections 1765.6(a)(3) and 1765.9(a).

**Wellhead and Production Facilities located inside an HPZ**

**One Sensitive Receptor Is Sufficient for Each Wellhead and Production Facility Inside an HPZ**

PRC section 3285(a)(2) contemplates that an operator need only identify "sufficient" sensitive receptors to determine that a wellhead or production facility is inside an HPZ and may cease adding new sensitive receptors after making that determination.

For the purposes of CCR sections 1765.6(a)(1) and (2), 1765.7(a)(1)(C), and 1765.8(a)(1)(C), for each wellhead or production facility in the inventory, a single, non-unique sensitive receptor that establishes the wellhead or production facility is within a HPZ is sufficient.

**Inventory Format Alternatives**

CCR section 1765.7(a) specifies the content that must be in a sensitive receptor inventory. Section 1765.7(b) specifies that an inventory shall be formatted as an Excel (.xls or .xlsx) or comma-separated value file (.csv).

CalGEM has developed templates and examples as appropriate to facilitate operator inventory, maps and statement submittal. Operators are encouraged to use these to support regulatory compliance. See links below.

As an alternative format, or in combination with an Excel or .csv file and/or facility plot plan as described below, operators may inventory production facilities on a detailed Piping and Instrumentation Diagram (P&ID), so long as all information required in CCR section 1765.7(a)(2) and (4) is provided. A P&ID can be provided in a portable document format (.pdf) or any other diagram format.

#### Sensitive Receptor Information for Aggregated Production Facilities

If a P&ID is used to aggregate and report production facilities in an HPZ, one non-unique sensitive receptor can be provided for each aggregate of production facilities, rather than for each individual production facility.

The identified sensitive receptor information required in CCR section 1765.7(a)(2) can be listed in Excel or .csv as a single row for each P&ID or facility plot plan as described below.

P&IDs provided to satisfy inventory requirements, in combination with facility plot plan(s) that meet the CCR section 1765.8(b) format requirements, may also be used to satisfy CCR section 1765.8(a)(2), so long as the plot plan identifies the location of the sensitive receptor and the location of each wellhead and each production facility (individually or in the aggregate), relative to the sensitive receptor(s). The P&ID or plot plan must mark the path of all pipelines.

#### **Wellheads and Production Facilities Located Outside An HPZ**

##### Statement Content

For each operator wellhead and production facility that the operator has determined is located outside of an HPZ, the operator must submit a statement to CalGEM. (CCR section 1765.6(a)(3).) The statement must include all supporting information required by CCR section 1765.9(a)(1) about features within 3,200 feet of the wellhead or production facility location.

For each feature, the operator must explain why the feature is not a sensitive receptor as defined in CCR section 1765.1(c).

For section 1765.9, subdivision (a)(1)(B), operators should identify all areas open to the public that might be considered a park, even if not officially designated as a park.

The operator should provide information sufficiently detailed to enable CalGEM to locate the listed feature and understand the basis for the operator's statement that the feature is not a sensitive receptor. A statement is inadequate if it merely states a conclusion that a feature is "not sensitive" or anything similar, without explanation.

##### Statement Format

An operator may use the P&ID format in combination with the plot plan, to identify and aggregate production facilities located outside an HPZ for purposes of the operator's

statement, in conjunction with another format to identify potential sensitive receptors. The accompanying statement must identify all features within 3200 feet of the perimeter of the aggregated production facilities.

Although section 1765.9, subdivision (a)(3) requires that a statement be submitted in specified formats, submission using Excel is also acceptable.

### **Templates and Examples**

Examples of statements and maps is also available at [Maps and Statements Examples](#).

A template for operators to submit required inventory for inside and outside of an HPZ is available on CalGEM's website at: [Annual Inventory Workbook Template](#).

### **Inventory, Map, and Statement Submissions**

The required sensitive receptor inventory, map, statements, and any associated information should be submitted by uploading relevant documents into WellSTAR using the "Organization Questionnaire" Form Document Upload capability. There are three document types in WellSTAR specifically for HPZ annual inventories:

1. Annual Sensitive Receptor Inventory
2. Annual Sensitive Receptor Map
3. Annual Sensitive Receptor Statement

The following steps should be followed to upload the documents at the organization level:

1. Start a new "Organization Questionnaire" Form
2. Complete Form Steps 1-3
3. Upload documents associated to appropriate document types at Step 4
  - a. Actions > Add New > Upload New Document
  - b. Category = "Organization"
  - c. Type = "Annual Sensitive Receptor (Inventory, map, or statement)"
4. Complete Form Steps 5-6 to submit the Form

For issues or questions related to uploading documents into WellSTAR, please contact [WellSTAR@conservation.ca.gov](mailto:WellSTAR@conservation.ca.gov).

**All Operators must submit their documents by the deadline of July 1, 2025, as required by the statute.** Violations of CalGEM statutes and regulations including failure to submit accurate receptor inventory, map(s) and statements by the due date may result in enforcement action including, but not limited to, administrative, civil or criminal action pursuant to Public Resources Code sections 3224, 3236, 3236.2, and/or 3236.5.

If you have any questions or concerns regarding compliance with this notice, please contact CalGEM Headquarters at [SB1137Implementation@conservation.ca.gov](mailto:SB1137Implementation@conservation.ca.gov).

*Doug Ito*

Doug Ito  
State Oil and Gas Supervisor