California
Department of
Conservation
Oil, Gas, and Geothermal
Resources

Requirements for Idle Well Testing and Management

Implementation Workshop

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Workshop Agenda

9:00 – 9:45	Idle Well Program Introduction and Overview
9:45 – 10:30	Testing Waiver Plan
10:45 – 11:30	Testing Compliance Work Plan
11:30 – 1:00	**LUNCH BREAK**
1:00 – 2:00	Idle Well Testing
2:00 – 2:15	**BREAK**
2:15 – 3:00	15-Year Engineering Analysis
3:00 – 3:30	Recap and Next Steps
3:30 – 4:00	General Q&A Session

Idle Well Program Introduction & Overview

Topics

1. A Year in Review – Lookback on 2018
2. Statutory and Regulatory Program Components
    - 2019 Idle Well Fees
    - 2019 Idle Well Management Plans
    - Program Timeline
3. Idle Well Inventories
4. Operator Resources
5. WellSTAR for Idle Wells
6. Future Workshops

A Year in Review – Lookback on 2018

2018 Fees

$4.3 Million received

- *147 operators submitted payment*

14 Orders to Plug and Abandon issued to date.

- *4 Orders rescinded*
- *7 Final Orders*

Enforcement

PRC Section 3206(c) *"Failure to file, for any well, the fee required under this section shall be conclusive evidence of desertion of the well, permitting the supervisor to order the well abandoned pursuant to Section 3237."*

A Year in Review – Lookback on 2018

California Department of Conservation

2018 IWMPs

76 IWMPs received

- Expected Elimination: 648
  - P&A: 581
  - RTU: 67

49 Compliant at Annual Review

- Actual Elimination: 971
  - P&A: 954
  - RTU: 17

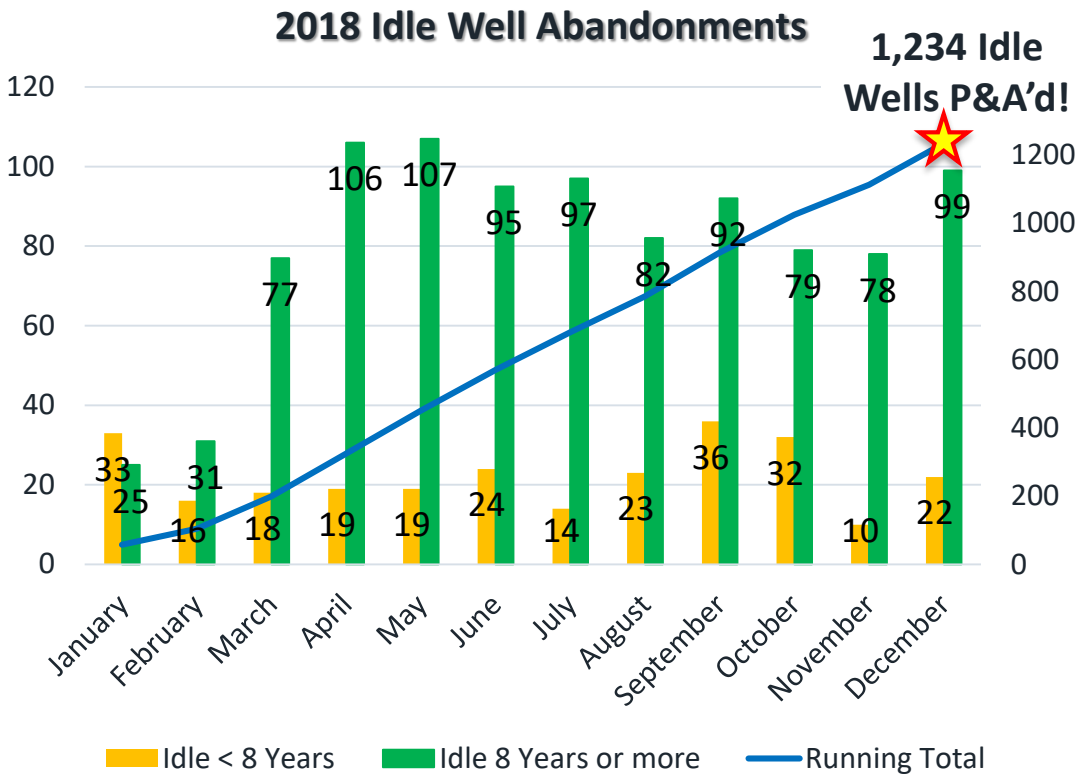
12 Notices of Cancellation Issued

Enforcement

Notice of Cancellation

- Notifies operator of non-compliance and IWMP cancellation.
- Past due idle well fees are due immediately.
- Operators have the right to appeal
- Failure to pay idle well fees is conclusive evidence of desertion.
  - Order to Plug and Abandon the well(s) will be issued.

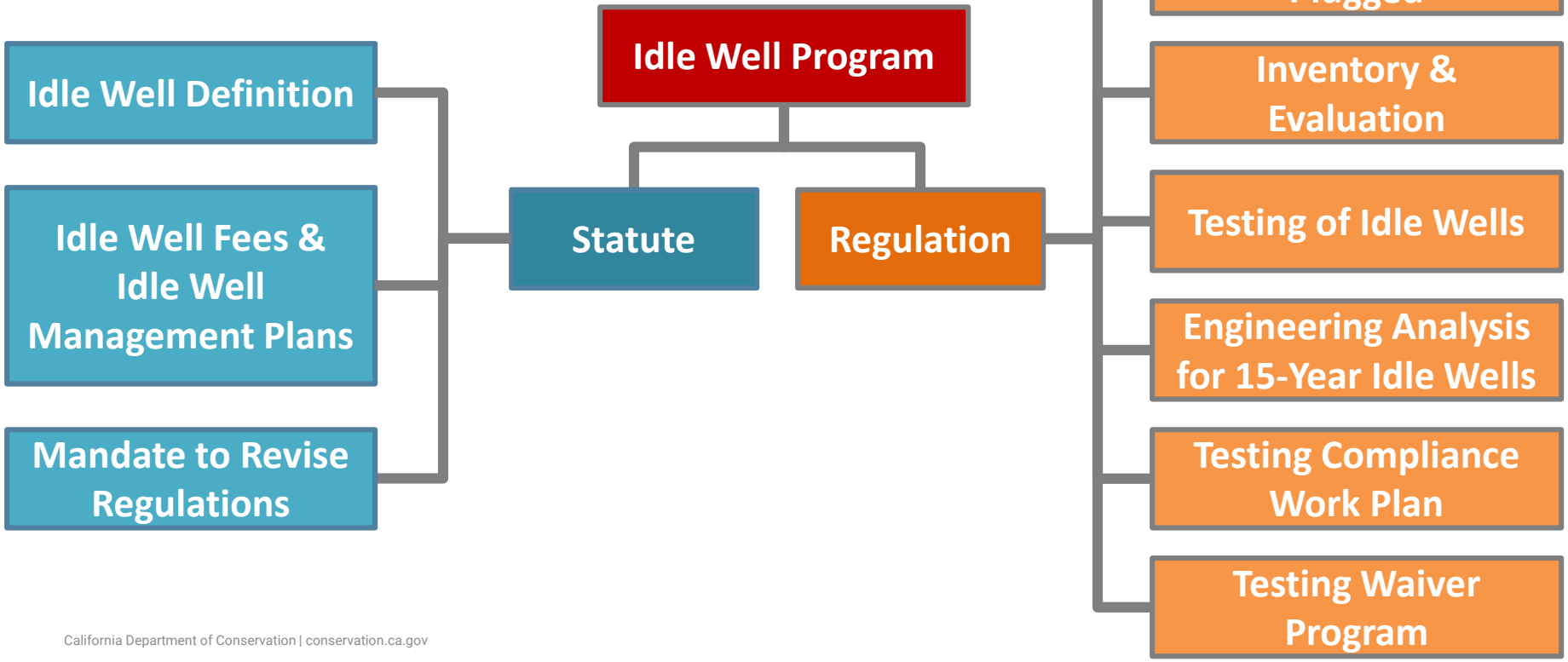
A Year in Review – Lookback on 2018



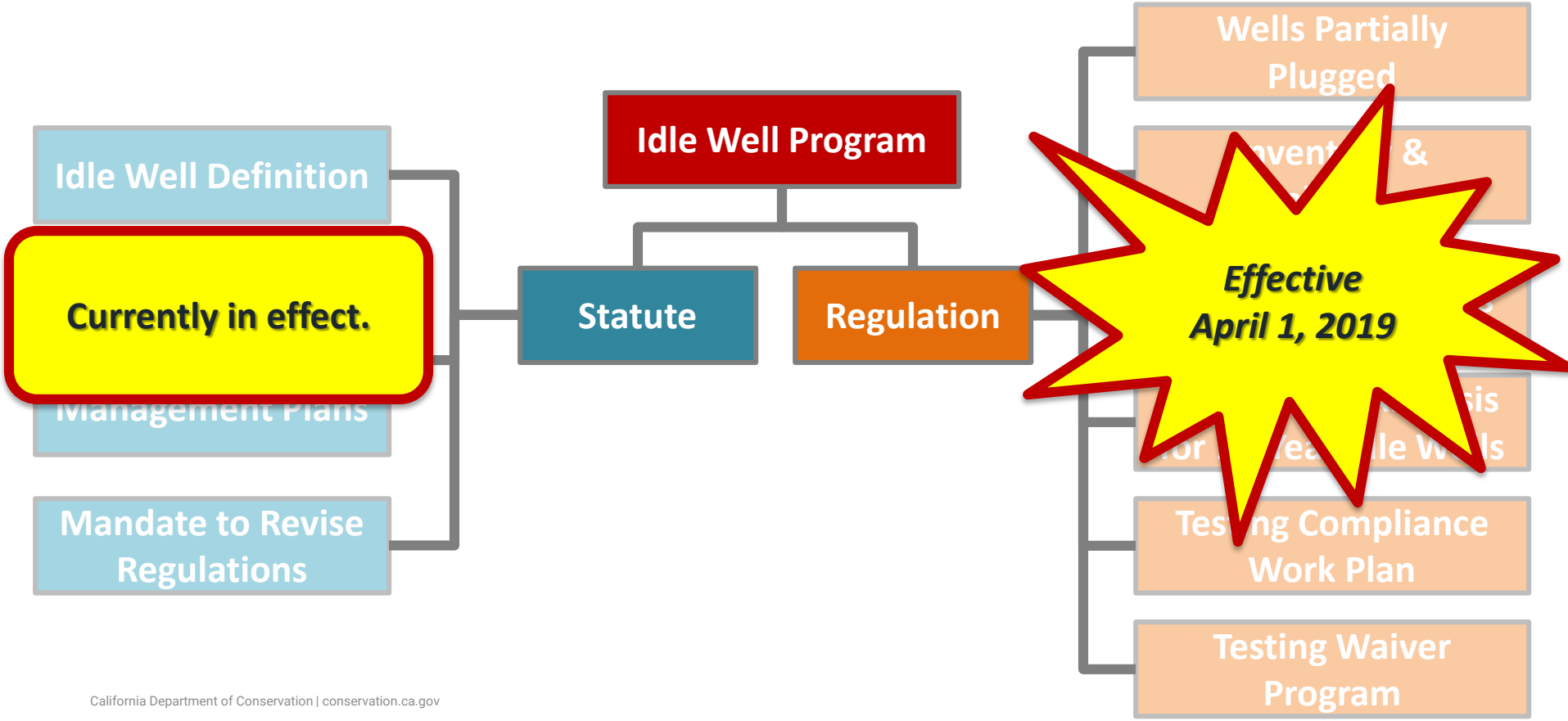
Lessons Learned

- Communication – Early, often, and clearly
- Ask when anything is not clear

Statutory and Regulatory Program Components



Statutory and Regulatory Program Components



Statutory and Regulatory Program Components

California Department of Conservation

Public Resources Code Section 3008

- Defines Idle Well and Long Term Idle Well

Public Resources Code Section 3206

- Defines Idle Well Fees and Idle Well Management Plan requirements and compliance.

Public Resources Code Section 3206.1

- Mandates review, evaluation, and update of regulations pertaining to idle wells.
- Requires fluid levels relative to underground sources of drinking water (USDW), mechanical integrity testing, appropriate remediation for wells lacking mechanical integrity, an engineering analysis for wells idle 15 years or more, and 2 year delay on required testing if well is not within ½ mile of a USDW.

California Code of Regulations Sections 1752, 1760, 1772, 1772.1, 1772.1.1, 1772.1.2, 1772.1.3, 1772.1.4, 1772.2, 1772.3, 1772.4, 1772.5, 1772.6, 1772.7

- Partially plugged well definition, Idle Well Inventory and Evaluation, Testing of Idle Wells, 15-Year Engineering Analysis, Testing Compliance Work Plan, Testing Waiver Plan, Idle Well Management Plan support, etc.

Statutory and Regulatory Program Components

PRC §3206 (c): Failure to file, for any well, the fee required under this section shall be *conclusive evidence of desertion* of the well, permitting the supervisor to order the well abandoned pursuant to Section 3237.

PRC §3206.1 (d): If the operator does not remediate an idle well as required by the regulations implementing this section, or the operator does not demonstrate that an idle well is economically viable as required by the regulations implementing this section, then the operator shall plug and abandon the idle well in accordance with Section 3208.

PRC §3206.1 (e): Failure to file to comply with the requirements of the regulations implementing this section shall be *conclusive evidence of desertion* of the well, permitting the supervisor to order the well abandoned pursuant to Section 3237.

Statutory and Regulatory Program Components

Statutory Changes Effective January 1, 2019

- *Idle Well Fees due May 1, 2019*
  - Idle Well Management Plans filed in lieu of Fees due May 1, 2019.

Statutory Changes Effective in 2018

- *Idle Well Management Plan elimination credits*
  - PRC Section 3206(a)(2)(B)(iii): "[…] If the operator has eliminated more wells than required in the prior two years, the supervisor may deduct from the new requirement the net total of long-term idle wells eliminated in excess of those previously required."

Regulatory Impact Effective April 1, 2019

- *Testing is not required for long-term idle wells scheduled for plug and abandonment as past of an Idle Well Management Plan.*
  - CCR Section 1772.3: "If an idle well is schedule to be plugged and abandoned as part of an Idle Well Management Plan approved by the Division under Public Resources Code section 3206, subdivision (a)(2), and the operator is in compliance with the plan, then the operator is not required to meet the requirements of [CCR] Sections 1772.1, 1772.1.1, or 1772.1.2 for that well."

Statutory and Regulatory Program Components
Idle Well Definition

When does a well become an idle well?

Simply put, a well becomes an idle well after 24 months of 0 reported volumes or non-reporting.

- *Idle Start Date: The date the well becomes and idle well.*
  - Example: If the last month of reported production of oil is June 2012, then the idle start date is the first day of the month after the 24th month of no reporting.
    - Idle Start Date is July 1, 2014
- *Years Idle: The number of years, to 2 decimal places, the well has met the definition of idle well. The years idle calculated for each inventory references the pertinent date for that inventory.*
  - Example: The idle start date of the well is July 1 ,2014.
    - Fee Inventory Years Idle (12/31/2018) is 4.50 years
    - IWMP Inventory Years Idle (1/1/2019) is 4.51 years
    - Compliance Inventory Years Idle (4/1/2019) is 4.75 years

Statutory and Regulatory Program Components
Idle Well Definition

When is a well no longer an idle well?

When the well is plugged and abandoned in accordance to PRC section 3208.

- *"[A] well is properly abandoned when it has been shown, to the satisfaction of the supervisor, that all proper steps have been taken to isolate all oil-bearing or gas-bearing strata encountered in the well, and to protect underground or surface water suitable for irrigation or farm or domestic purposes from the infiltration or addition of any detrimental substance and to prevent subsequent damage to life, health, property, and other resources. For purposes of this subdivision, proper steps include the plugging of the well, decommissioning the attendant production facilities of the well, or both, if determined necessary by the supervisor. "* PRC Section 3208(a)

Statutory and Regulatory Program Components
Idle Well Definition

When is a well no longer an idle well?

When the well has maintained production of oil or natural gas, maintained production of water used in production stimulation, or been used for enhanced oil recovery, reservoir pressure management, or injection for a continuous six-month period.

- *Date returned to Active status: The date the well no longer meets the definition of idle well. This the first day of the month after the 6th month of reported volumes.*
    - Example: If the well was returned to production in March 2017 and maintained 6 consecutive months of production, the well no longer meets the definition of idle well on September 1, 2017.
    - This well remains on the 2017 Calendar Year Inventory (fees).
    - This well will not be included on the 2018 IWMP Inventory.

Statutory and Regulatory Program Components
2019 Idle Well Management Plans

- Elimination of an idle well shall be accomplish when the well has been properly abandoned in accordance with PRC Section 3208, or it has bene shown to the division's satisfaction that, since the well became an idle well, the well has maintained production of oil or gas or been used for injection for a continuous six-month period.
    - *Elimination is NOT: converting an idle well to an observation or monitoring well or transferring wells to a new operator.*
- Plans operate on the calendar year, January 1 through December 31 of each year.
    - *Elimination requirements must be met by December 31 of the current calendar year.*
    - *A well remains an idle well until all 6 consecutive months of production or injection are concluded by December 31 of the calendar year.*

Statutory and Regulatory Program Components
2019 Idle Well Management Plans

- The 2019 IWMP form has been updated to include the application of earned elimination credits.
- The 2019 IWMP form has been updated to include an “elimination bank”.
  - *Optional table to identify long-term idle wells scheduled to be plugged and abandoned during the approved length of the IWMP.*
- 2019 IWMP Annual Reviews will be conducted via mail and e-mail.
  - *In-person reviews may be requested by the operator.*
- The Idle Well Program will only be tracking those wells identified by the operator for elimination.
  - *Any wells that you plan on eliminating during the year in excess of your minimum requirement need to be included on the Elimination Schedule for tracking purposes.*

2019 Idle Well Management Plan Form
Approval Process

1. Submit the IWMP form to DOGGRIdleWells@conservation.ca.gov
2. DOGGR reviews the proposed IWMP for:
    - Wells counts, minimum annual P&A requirements, and term length.
    - Notes on the basis for prioritizing wells and schedule of wells.
3. DOGGR returns the IWMP:
    - Approved – IWMP approved.
    - Contingent on Revision – Revision to the IWMP are required before DOGGR will approve the IWMP.
        - Types of revisions: Length of IWMP, well prioritization, inventory discrepancies, incorrect annual P&A requirements.
4. The annual review for compliance is January 1, 2020. All eliminations must be completed on or before December 31, 2019.

2019 Idle Well Management Plan Form

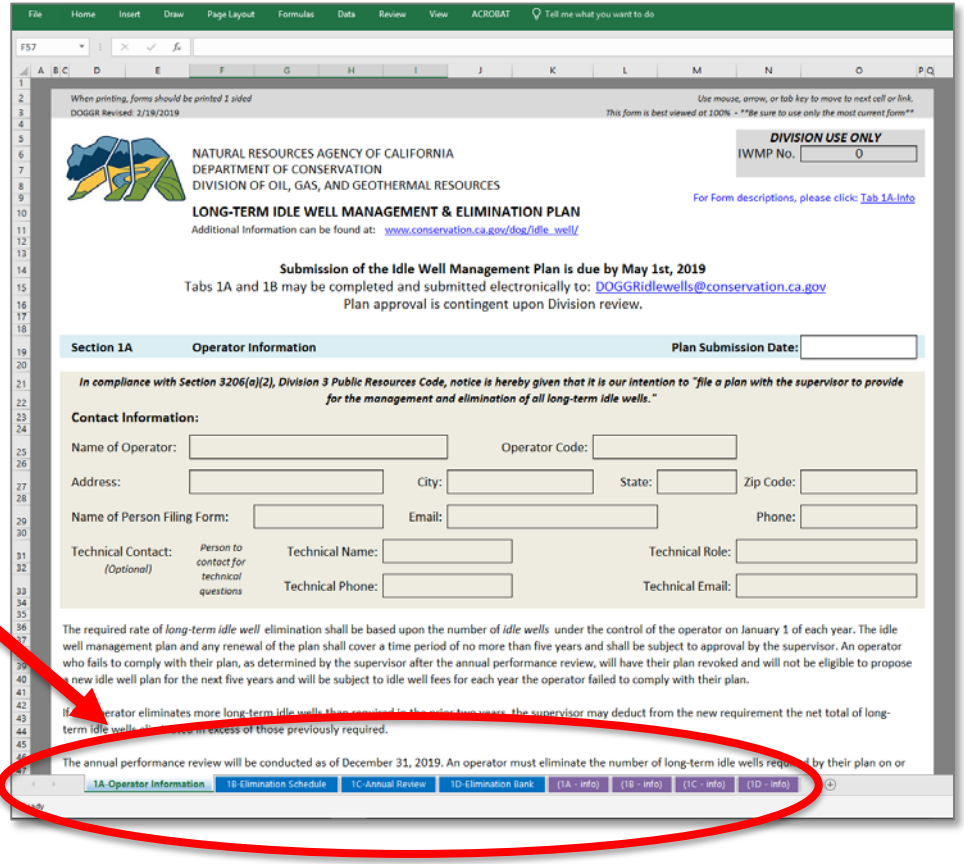
The Idle Well Management Plan form can be downloaded from the DOGGR Idle Well Program webpage.

Microsoft Excel™ file

Comprised of 4 tabs:

- 1A-Operator Information
- 1B-Elimination Schedule
- 1C-Annual Review
- 1D-Elimination Bank

Associated information tabs for each section of the form.



IWMP Form
Tab 1A-Operator Information

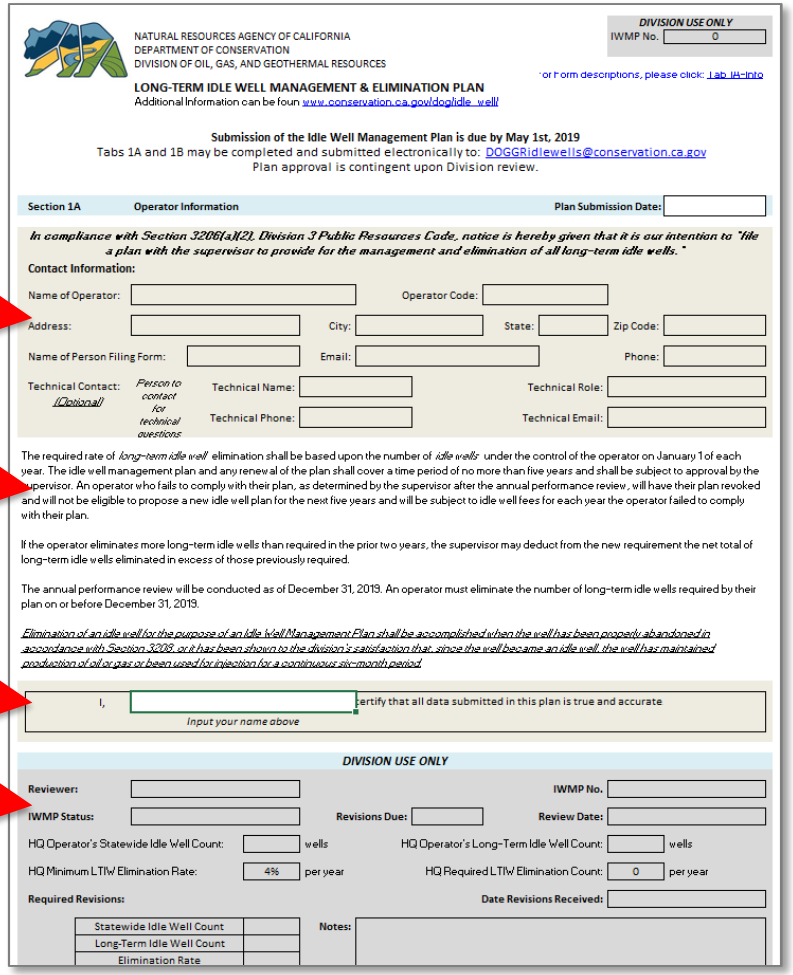
Contact Information Section

IWMP requirements

Certification of IWMP accuracy

DOGGR Review Section

- Contains notes on required revisions and due dates



NATURAL RESOURCES AGENCY OF CALIFORNIA
DEPARTMENT OF CONSERVATION
DIVISION OF OIL, GAS, AND GEOTHERMAL RESOURCES

DIVISION USE ONLY
IWMP No. 0

For Form descriptions, please click: Tab 1A-Info

LONG-TERM IDLE WELL MANAGEMENT & ELIMINATION PLAN
Additional Information can be foun www.conservation.ca.gov/dog/idle_well/

Submission of the Idle Well Management Plan is due by May 1st, 2019
Tabs 1A and 1B may be completed and submitted electronically to: DOGGRidlewells@conservation.ca.gov
Plan approval is contingent upon Division review.

Section 1A **Operator Information** **Plan Submission Date:**

In compliance with Section 3206(a)(2), Division 3 Public Resources Code, notice is hereby given that it is our intention to "file a plan with the supervisor to provide for the management and elimination of all long-term idle wells."

Contact Information:

Name of Operator: Operator Code:
Address: City: State: Zip Code:
Name of Person Filing Form: Email: Phone:
Technical Contact: *(Optional)* *Person to contact for technical questions* Technical Name: Technical Role:
Technical Phone: Technical Email:

The required rate of *long-term idle well* elimination shall be based upon the number of *idle wells* under the control of the operator on January 1 of each year. The idle well management plan and any renewal of the plan shall cover a time period of no more than five years and shall be subject to approval by the supervisor. An operator who fails to comply with their plan, as determined by the supervisor after the annual performance review, will have their plan revoked and will not be eligible to propose a new idle well plan for the next five years and will be subject to idle well fees for each year the operator failed to comply with their plan.

If the operator eliminates more long-term idle wells than required in the prior two years, the supervisor may deduct from the new requirement the net total of long-term idle wells eliminated in excess of those previously required.

The annual performance review will be conducted as of December 31, 2019. An operator must eliminate the number of long-term idle wells required by their plan on or before December 31, 2019.

Elimination of an idle well for the purpose of an Idle Well Management Plan shall be accomplished when the well has been properly abandoned in accordance with Section 3208, or it has been shown to the division's satisfaction that, since the well became an idle well, the well has maintained production of oil or gas or been used for injection for a continuous six-month period.

I, *Input your name above* certify that all data submitted in this plan is true and accurate.

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Reviewer: IWMP No.
IWMP Status: Revisions Due: Review Date:
HQ Operator's Statewide Idle Well Count: wells HQ Operator's Long-Term Idle Well Count: wells
HQ Minimum LTIW Elimination Rate: 4% per year HQ Required LTIW Elimination Count: 0 per year
Required Revisions: Date Revisions Received:

Statewide Idle Well Count	
Long-Term Idle Well Count	
Elimination Rate	

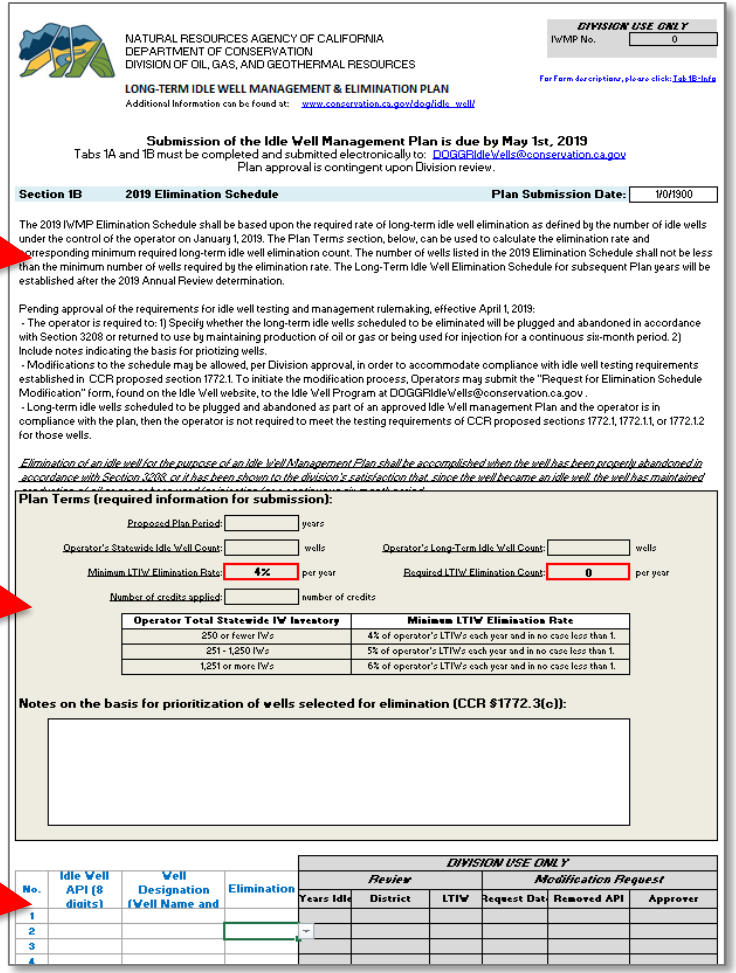
Notes:

Testing Waiver Form
Tab 1B-Testing Waiver

IWMP requirements

IWMP Terms
- Plan Length
- Well Counts & Elimination Rate
- Earned Elimination Credits Applied
- Notes on prioritization

List of Wells on IWMP
- API and Name
- Elimination Type



NATURAL RESOURCES AGENCY OF CALIFORNIA
DEPARTMENT OF CONSERVATION
DIVISION OF OIL, GAS, AND GEOTHERMAL RESOURCES

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IWMP No. 0

LONG-TERM IDLE WELL MANAGEMENT & ELIMINATION PLAN
Additional Information can be found at: www.conservation.ca.gov/dog/idle_well/

For Form descriptions, please click: Tab 1B-Info

Submission of the Idle Well Management Plan is due by May 1st, 2019
Tabs 1A and 1B must be completed and submitted electronically to: DOGGRIdleWells@conservation.ca.gov
Plan approval is contingent upon Division review.

Section 1B **2019 Elimination Schedule** **Plan Submission Date:** 1/0/1900

The 2019 IWMP Elimination Schedule shall be based upon the required rate of long-term idle well elimination as defined by the number of idle wells under the control of the operator on January 1, 2019. The Plan Terms section, below, can be used to calculate the elimination rate and corresponding minimum required long-term idle well elimination count. The number of wells listed in the 2019 Elimination Schedule shall not be less than the minimum number of wells required by the elimination rate. The Long-Term Idle Well Elimination Schedule for subsequent Plan years will be established after the 2019 Annual Review determination.

Pending approval of the requirements for idle well testing and management rulemaking, effective April 1, 2019:
- The operator is required to: 1) Specify whether the long-term idle wells scheduled to be eliminated will be plugged and abandoned in accordance with Section 3208 or returned to use by maintaining production of oil or gas or being used for injection for a continuous six-month period. 2) Include notes indicating the basis for prioritizing wells.
- Modifications to the schedule may be allowed, per Division approval, in order to accommodate compliance with idle well testing requirements established in CCR proposed section 1772.1. To initiate the modification process, Operators may submit the "Request for Elimination Schedule Modification" form, found on the Idle Well website, to the Idle Well Program at DOGGRIdleWells@conservation.ca.gov .
- Long-term idle wells scheduled to be plugged and abandoned as part of an approved Idle Well management Plan and the operator is in compliance with the plan, then the operator is not required to meet the testing requirements of CCR proposed sections 1772.1, 1772.1.1, or 1772.1.2 for those wells.

Elimination of an idle well for the purpose of an Idle Well Management Plan shall be accomplished when the well has been properly abandoned in accordance with Section 3208, or it has been shown to the division's satisfaction that, since the well became an idle well, the well has maintained

Plan Terms (required information for submission):

Proposed Plan Period: years

Operator's Statewide Idle Well Count: wells — Operator's Long-Term Idle Well Count: wells

Minimum LTIW Elimination Rate: 4% per year — Required LTIW Elimination Count: 0 per year

Number of credits applied: number of credits

Operator Total Statewide IW Inventory	Minimum LTIW Elimination Rate
250 or fewer IWs	4% of operator's LTIWs each year and in no case less than 1.
251 - 1,250 IWs	5% of operator's LTIWs each year and in no case less than 1.
1,251 or more IWs	6% of operator's LTIWs each year and in no case less than 1.

Notes on the basis for prioritization of wells selected for elimination (CCR §1772.3(c)):

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No.	Idle Well API (8 digits)	Well Designation (Well Name and	Elimination	Review			Modification Request		
				Years Idle	District	LTIW	Request Dat	Removed API	Approver
1									
2									
3									
4									

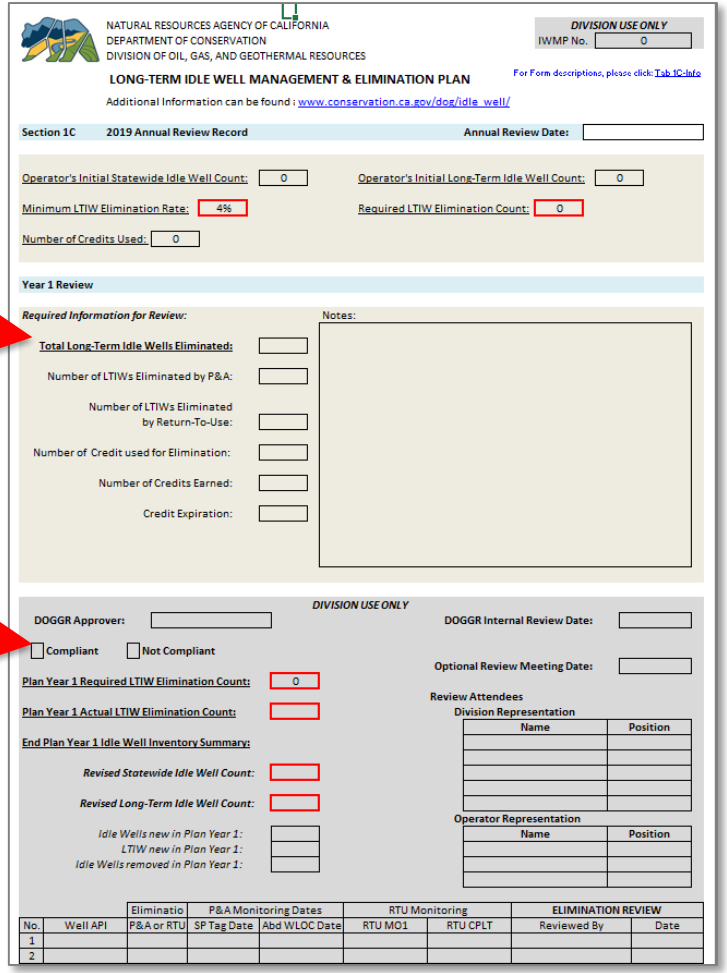
IWMP Form
Tab 1C-Annual Review

Annual Review Counts

- Required and Actual eliminations
- Number of credits applied
- Number of credits earned

DOGGR Review Tracking

- Compliance Determination
- DOGGR Reviewer
- Required and Actual eliminations
- Individual well elimination tracking



NATURAL RESOURCES AGENCY OF CALIFORNIA
DEPARTMENT OF CONSERVATION
DIVISION OF OIL, GAS, AND GEOTHERMAL RESOURCES

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LONG-TERM IDLE WELL MANAGEMENT & ELIMINATION PLAN

For Form descriptions, please click: Tab 1C-Info

Additional Information can be found : www.conservation.ca.gov/dog/idle_well/

Section 1C 2019 Annual Review Record Annual Review Date:

Operator's Initial Statewide Idle Well Count: 0
Operator's Initial Long-Term Idle Well Count: 0
Minimum LTIW Elimination Rate: 4%
Required LTIW Elimination Count: 0
Number of Credits Used: 0

Year 1 Review

Required Information for Review:

Notes:

Total Long-Term Idle Wells Eliminated:
Number of LTIWs Eliminated by P&A:
Number of LTIWs Eliminated by Return-To-Use:
Number of Credit used for Elimination:
Number of Credits Earned:
Credit Expiration:

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DOGGR Approver:
DOGGR Internal Review Date:
Compliant
Not Compliant
Optional Review Meeting Date:
Plan Year 1 Required LTIW Elimination Count: 0
Plan Year 1 Actual LTIW Elimination Count:
Review Attendees
Division Representation

Name	Position

End Plan Year 1 Idle Well Inventory Summary:

Revised Statewide Idle Well Count:
Revised Long-Term Idle Well Count:

Idle Wells new in Plan Year 1:
LTIW new in Plan Year 1:
Idle Wells removed in Plan Year 1:

Operator Representation

Name	Position

		Eliminatio	P&A Monitoring Dates		RTU Monitoring		ELIMINATION REVIEW	
No.	Well API	P&A or RTU	SP Tag Date	Abd WLOC Date	RTU MO1	RTU CPLT	Reviewed By	Date
1								
2								

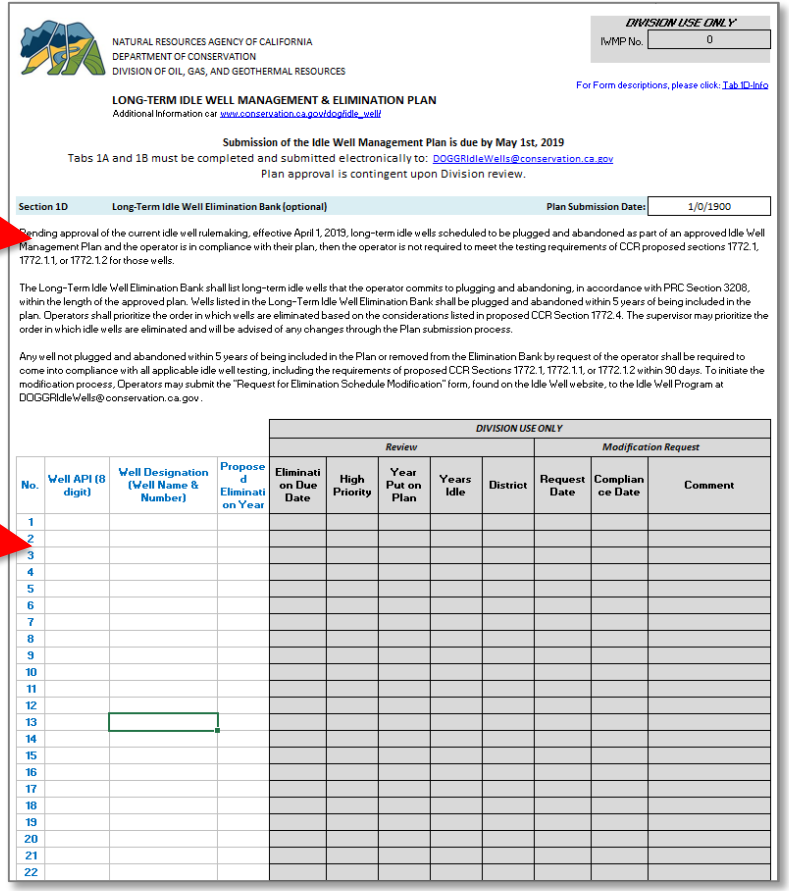
IWMP Form
Tab 1D-Elmination Bank (optional)

California Department of Conservation

IWMP Requirements & Relationship to Idle Well Testing

List of Wells in Elimination Bank

- API and Name
- Proposed Elimination Year (not to exceed the approved IWMP length)



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IWMP No. 0

For Form descriptions, please click: Tab 1D-Info

LONG-TERM IDLE WELL MANAGEMENT & ELIMINATION PLAN
Additional Information at www.conservation.ca.gov/dog/idle_well/

Submission of the Idle Well Management Plan is due by May 1st, 2019
Tabs 1A and 1B must be completed and submitted electronically to: DOGGRIdleWells@conservation.ca.gov
Plan approval is contingent upon Division review.

Section 1D **Long-Term Idle Well Elimination Bank (optional)** **Plan Submission Date:** 1/0/1900

Pending approval of the current idle well rulemaking, effective April 1, 2019, long-term idle wells scheduled to be plugged and abandoned as part of an approved Idle Well Management Plan and the operator is in compliance with their plan, then the operator is not required to meet the testing requirements of CCR proposed sections 1772.1, 1772.1.1, or 1772.1.2 for those wells.

The Long-Term Idle Well Elimination Bank shall list long-term idle wells that the operator commits to plugging and abandoning, in accordance with PRC Section 3208, within the length of the approved plan. Wells listed in the Long-Term Idle Well Elimination Bank shall be plugged and abandoned within 5 years of being included in the plan. Operators shall prioritize the order in which wells are eliminated based on the considerations listed in proposed CCR Section 1772.4. The supervisor may prioritize the order in which idle wells are eliminated and will be advised of any changes through the Plan submission process.

Any well not plugged and abandoned within 5 years of being included in the Plan or removed from the Elimination Bank by request of the operator shall be required to come into compliance with all applicable idle well testing, including the requirements of proposed CCR Sections 1772.1, 1772.1.1, or 1772.1.2 within 90 days. To initiate the modification process, Operators may submit the "Request for Elimination Schedule Modification" form, found on the Idle Well website, to the Idle Well Program at DOGGRIdleWells@conservation.ca.gov.

				DIVISION USE ONLY							
				Review					Modification Request		
No.	Well API (8 digit)	Well Designation (Well Name & Number)	Proposed Elimination Year	Elimination Due Date	High Priority	Year Put on Plan	Years Idle	District	Request Date	Compliance Date	Comment
1											
2											
3											
4											
5											
6											
7											
8											
9											
10											
11											
12											
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16											
17											
18											
19											
20											
21											
22											

Statutory and Regulatory Program Components
2019 Idle Well Fees

- Fees are calculated based on the years idle for each well that met the definition of idle well in the prior calendar year, in this case for 2018.
  - *If the well was idle and plugged and abandoned in 2018, it is on the list.*
  - *If the well was idle and returned to use in 2018, it is on the list.*
- The operator in possession of the well at the close of the prior calendar year is responsible for fees for that well.
  - *For 2019 fees, it is the operator as of December 31, 2018.*
- Corrections to the inventory and fees due will not be made until production/injection data can be verified.
  - *Submission of OG110 and OG110B to WellSTAR.*
    - *NTO 2018-14 and NTO 2018-3 allowed for late submission, not no submission.*

Statutory and Regulatory Program Components
Program Timeline

2019

April 1 – Regulations become effective

May 1 – Idle Well Fees and Idle Well Management Plans due (every year)

June 1 – Testing Compliance Work Plans due

December 31 – 2019 Idle Well Management Plans elimination due date (every year)

2020

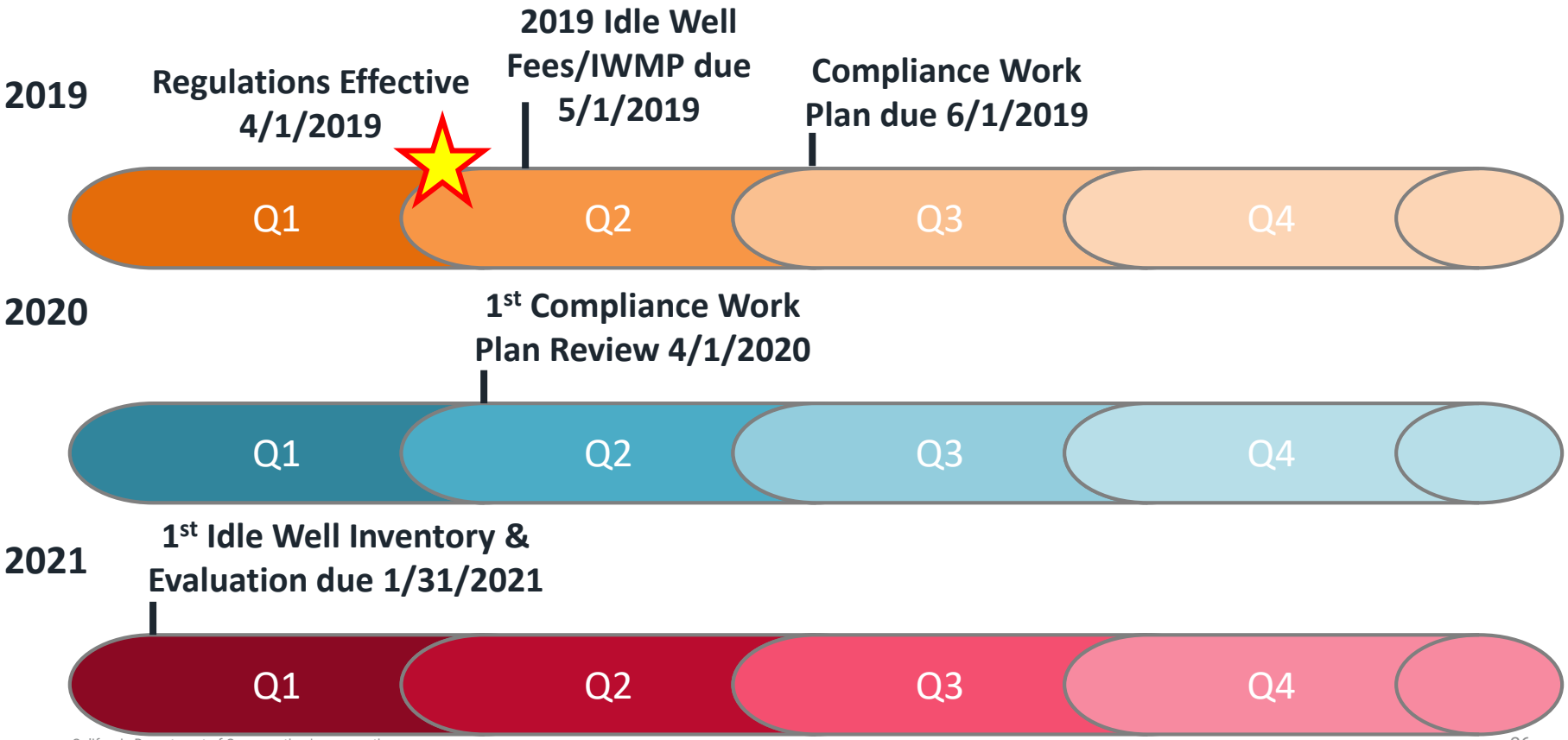
April 1 – 2019 Testing Compliance Work Plan compliance due

2021

January 31 – Idle Well Inventory and Evaluation due

April 1 – 2020 Testing Compliance Work Plan compliance due (every year until 2025)

Statutory and Regulatory Program Components
Program Timeline



Operator Resources

California Department of Conservation

DOGGR Idle Well Program Webpage

- All forms
- All inventories
  - Updates made weekly through July, then monthly for remainder of year.
  - Preliminary inventories currently posted. Do not reflect wells that became idle in 2018.
- Most frequently asked questions incorporated in body of the page.
- Link to Fee Invoices
  - 2018 currently available
  - 2019 pending

DOGGR Idle Well Program (Headquarters)

- DOGGRIdleWells@conservation.ca.gov
- 916-445-9686 and ask for the Idle Well Program

Local DOGGR Office

- Each office has staff that specialize in idle wells

Operator Resources

California Department of Conservation

HQ Idle Well Program

- Manages Idle Well Inventories
- Manages IWMP, Testing Waiver Plans, and Compliance Work Plans
- Receives and processes Idle Well Inventory and Evaluation
- Receives 15-Year Engineering Analysis, manages reviews, and communicates determination
- Enforcement

District Offices

- Permitting
- Witnessing of tests and review of test results
- Conducts 15-Year Engineering Analysis review
- Idle well inspections and production verification
- Enforcement

Idle Well Inventories

California Department of Conservation

2018 Calendar Year Inventory

- Inventory from which 2019 Idle Well Fees are calculated.
- All wells that met the definition of idle well at any point in the 2018 calendar year (January 1 through December 31).

2019 Idle Well Management Plan Inventory

- Inventory from which 2019 Idle Well Management Plans are calculated.
- All wells that met the definition of idle well as of January 1, 2019.

Compliance Work Plan Inventory

- Identifies for each well which tests are required during the 6-year compliance period.
- All wells that met the definition of idle well as of April 1, 2019.

Current Idle Well Inventory

- All wells that met the definition of idle well as of the 1st of each month.
- Updated monthly and posted to the DOGGR Idle Well Program webpage.
    - *WellSTAR will not be accurate until October 2019.*

WellSTAR for Idle Wells

California Department of Conservation

Currently in WellSTAR

- Uploading Test Results to WellSTAR
- Uploading Monthly Reporting to WellSTAR (OG110/110B)

Release 4 (May 2019)

- Idle Well Inventory (Partial functionality)
- Idle Well Fee Letters
- Transactions

Release 5 (October 2019)

- Idle Well Inventory (Fully functional)
- Idle Well Management Plans
- Idle Well Testing Waiver Plans
- Idle Well Testing Compliance Work Plans
- Idle Well Inventory and Evaluation
- Idle Well Next Test Due Dates
- 15-Year Engineering Analysis

Future Workshops

- **Idle Well Inventory and Evaluation**
  - Form will be available May 2019
- **Partially Plugged Wells**
- **Idle Wells that are Infeasible to Physically Access (Idle-Buried)**

THANK YOU

Questions?

Presenter Name
Presenter Email

Testing Waiver Plan

CCR §1772.2

Topics

1. **What is the Testing Waiver Plan?**
    - Requirements and Compliance
    - Due date and Annual Review
    - Relationship with IWMP, Compliance Workplan, and Testing
3. **Approval Process**
4. **Annual Review Process**
5. **Waiver Amendments**
6. **Testing Waiver Form**

What is the Testing Waiver Plan?

"A Testing Waiver Plan is a schedule for plugging and abandonment of idle wells that extends up to but not more than eight years into the future. If an idle well is scheduled to be plugged and abandoned as part of a Testing Waiver Plan, the plan that has been approved by the Division, and the operator is in compliance with the plan, then the operator is not required to meet the requirements of Sections 1772.1, 1772.1.1, or 1772.1.2 for that well." (CCR §1772.2)

Simply put…

- It is a commitment to plug and abandon idle wells in exchange for a waiver from testing requirements.
    - For the purpose of the Testing Waiver Plan, "plugging and abandonment" means plugging and abandonment in accordance with PRC section 3208 or partial plugging and abandonment in accordance with CCR Section 1752.

What is the Testing Waiver Plan?
Requirements and Compliance

California Department of Conservation

The Waiver shall include:

- A list of idle wells to be plugged and abandoned under the plan.
  - API number and name of well
- The date by which the well is scheduled to be plugged and abandoned.
- Any known wellbore integrity deficiencies in the well, including an explanation of the deficiency, when it became known, and a description of any prior attempts to remediate or abandon the wellbore.

Waiver Terms:

- The plan may extend up to 8 years into the future.
- At least 10% of the idle wells covered by the plan shall be scheduled to be plugged and abandoned in each year of the plan.
- Wells shall be prioritized based on the considerations listed in CCR Section 1772.4.
- All idle wells covered by the plan shall be scheduled to be plugged and abandoned within 8 years.

What is the Testing Waiver Plan?
Requirements and Compliance

California Department of Conservation

Compliance

- If an operator fails to complete plugging and abandonment of any well according to the schedule approved by the Division, then the Division may cancel the Testing Waiver Plan.
    - If the Division cancels the Testing Waiver Plan, then the exemptions from testing no longer apply for any of the wells listed in the plan and the operator shall conduct the testing and analysis required under Sections 1772.1, 1772.1.1, and 1772.1.2 for each of the listed wells within 90 days of the Division cancelling the plan.
    - If the Division has canceled a Testing Waiver Plan, then the Division will not consider a new Testing Waiver Plan for approval unless the operator is in compliance with all of the requirements of Sections 1772.1, 1772.1.1, and 1772.1.2.

What is the Testing Waiver Plan?
Due Date and Annual Review

- There is no due date for initial submission.
- The approval date sets the annual review date.
  - *The minimum 10% of the wells on the Waiver must be plugged and abandoned by the annual review date.*
- The compliance due date is the date by which all the wells originally included on the Waiver must be plugged and abandoned.
  - *The date is dependent on the original Waiver length and approval date.*

Example:

- *A Waiver is approved on 6/1/2019 to include 50 wells and 8 year length.*
  - *First Annual Review date is 6/1/2020, minimum of 5 wells P&A'd*
  - *Compliance Due date is 6/1/2028, 50 wells P&A*

What is the Testing Waiver Plan?
Relationship with IWMP, Compliance Work Plan, and Testing

California Department of Conservation

Testing

Wells scheduled for P&A on an IWMP are excluded from testing.

Wells scheduled for P&A on a Testing Waiver Plan are excluded from testing.

Compliance Work Plan

The Compliance Work Plan includes all wells that met the definition of idle well on or before April 1, 2019 except those wells scheduled for plugging and abandonment under an approved IWMP or Testing Waiver Plan.

Approval Process

1. Submit the Testing Waiver Plan form to DOGGRIdleWells@conservation.ca.gov
2. DOGGR reviews the proposed Waiver for:
    - Wells counts, minimum annual P&A requirements, and term length.
    - Notes on the basis for prioritizing wells and schedule of wells.
3. DOGGR returns the Waiver:
    - Approved – Testing Waiver Plan approved.
    - Contingent on Revision – Revision to the Waiver are required before DOGGR will approve the Waiver.
        - Types of revisions: Length of Waiver, well prioritization, incorrect annual P&A requirements.
4. Get to work!
    - The annual review for compliance is 1 year from the approval date.

Annual Review Process

1. DOGGR reviews the database to confirm plug and abandonment of all wells scheduled under the Waiver for the year.
2. DOGGR documents review results and notifies operator of annual review results.
    - Compliant – Letter documenting compliance and includes instructions for renewal of the Waiver. Renewal may include updating the prioritization of wells, inclusion of additional wells, or extension of the Waiver.
    - Non-Compliant – Letter documenting non-compliance.
        - The Division may cancel the Testing Waiver Plan if an operator fails to complete plugging and abandonment of any well according to the schedule approved by the Division.
    - Operator may request an in-person review of the results.
3. Operator submits renewal for approval and we begin again.

Waiver Amendments

Amendment is subject to the Division's approval.

The operator may request to modify the idle wells listed in an approved Testing Waiver Plan.

- A request to modify the list of idle wells shall be supported by:
  - Justification for the change.
  - Information required under CCR Section 1772.2 (b)(1) for any idle wells added to the list.
  - A work plan for expeditiously bringing any wells removed from the list into compliance with the requirements of CCR Sections 1772.1, 1772.1.1, and 1722.1.2.
- Waiver Amendment Request form will be published to DOGGR Idle Well Program webpage this summer.

Testing Waiver Form

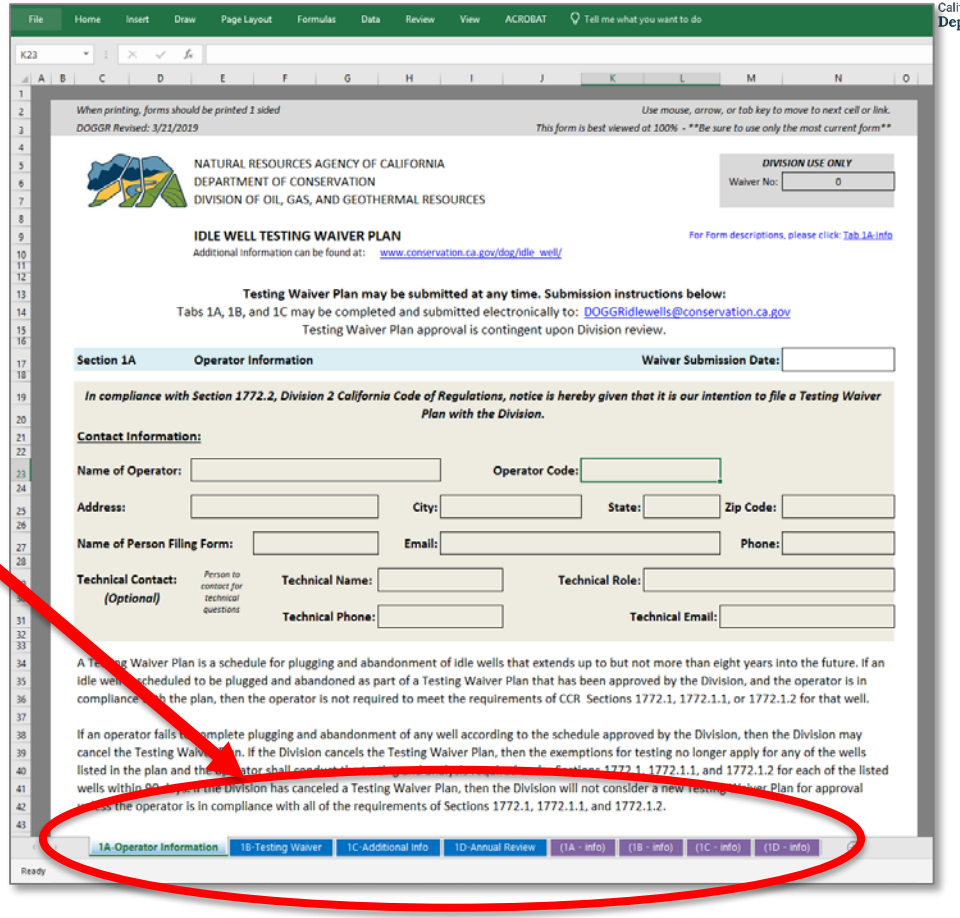
The Testing Waiver Plan form can be downloaded from the DOGGR Idle Well Program webpage.

Microsoft Excel™ file

Comprised of 4 tabs:

- 1A-Operator Information
- 1B-Testing Waiver
- 1C-Additional Information
- 1D-Annual Review

Associated information tabs for each section of the form.



When printing, forms should be printed 1 sided
DOGGR Revised: 3/21/2019

Use mouse, arrow, or tab key to move to next cell or link.
This form is best viewed at 100% - **Be sure to use only the most current form**

NATURAL RESOURCES AGENCY OF CALIFORNIA
DEPARTMENT OF CONSERVATION
DIVISION OF OIL, GAS, AND GEOTHERMAL RESOURCES

DIVISION USE ONLY
Waiver No: 0

IDLE WELL TESTING WAIVER PLAN
Additional information can be found at: www.conservation.ca.gov/dog/idle_well/

For Form descriptions, please click: Tab 1A-info

Testing Waiver Plan may be submitted at any time. Submission instructions below:
Tabs 1A, 1B, and 1C may be completed and submitted electronically to: DOGGRidlewells@conservation.ca.gov
Testing Waiver Plan approval is contingent upon Division review.

Section 1A Operator Information Waiver Submission Date:

In compliance with Section 1772.2, Division 2 California Code of Regulations, notice is hereby given that it is our intention to file a Testing Waiver Plan with the Division.

Contact Information:

Name of Operator: Operator Code:

Address: City: State: Zip Code:

Name of Person Filing Form: Email: Phone:

Technical Contact: (Optional) Person to contact for technical questions Technical Name: Technical Role:
Technical Phone: Technical Email:

A Testing Waiver Plan is a schedule for plugging and abandonment of idle wells that extends up to but not more than eight years into the future. If an idle well is scheduled to be plugged and abandoned as part of a Testing Waiver Plan that has been approved by the Division, and the operator is in compliance with the plan, then the operator is not required to meet the requirements of CCR Sections 1772.1, 1772.1.1, or 1772.1.2 for that well.

If an operator fails to complete plugging and abandonment of any well according to the schedule approved by the Division, then the Division may cancel the Testing Waiver Plan. If the Division cancels the Testing Waiver Plan, then the exemptions for testing no longer apply for any of the wells listed in the plan and the operator shall conduct the testing required by Sections 1772.1, 1772.1.1, and 1772.1.2 for each of the listed wells within 90 days. If the Division has canceled a Testing Waiver Plan, then the Division will not consider a new Testing Waiver Plan for approval unless the operator is in compliance with all of the requirements of Sections 1772.1, 1772.1.1, and 1772.1.2.

1A-Operator Information | 1B-Testing Waiver | 1C-Additional Info | 1D-Annual Review | (1A - info) | (1B - info) | (1C - info) | (1D - info)

Ready

Testing Waiver Form
Tab 1A-Operator Information

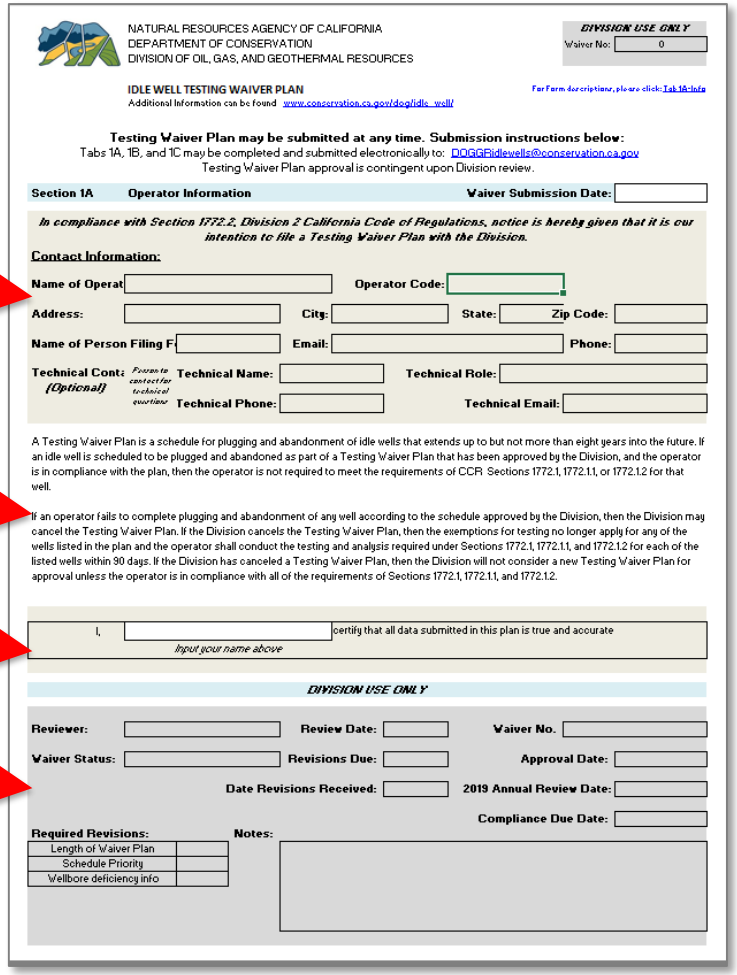
Contact Information Section

Testing Waiver Plan requirements

Certification of plan accuracy

DOGGR Review Section

- Contains notes on Waiver approval and due dates



NATURAL RESOURCES AGENCY OF CALIFORNIA
DEPARTMENT OF CONSERVATION
DIVISION OF OIL, GAS, AND GEOTHERMAL RESOURCES

DIVISION USE ONLY
Waiver No: 0

IDLE WELL TESTING WAIVER PLAN
Additional Information can be found www.conservation.ca.gov/dog/idle_well/

For Form descriptions, please click: Tab 1A-Info

Testing Waiver Plan may be submitted at any time. Submission instructions below:
Tabs 1A, 1B, and 1C may be completed and submitted electronically to: DOGGRidlewells@conservation.ca.gov
Testing Waiver Plan approval is contingent upon Division review.

Section 1A Operator Information — Waiver Submission Date:

In compliance with Section 1772.2, Division 2 California Code of Regulations, notice is hereby given that it is our intention to file a Testing Waiver Plan with the Division.

Contact Information:

Name of Operat — Operator Code:
Address: — City: — State: — Zip Code:
Name of Person Filing F — Email: — Phone:
Technical Conta (Optional) — Person to contact for technical questions — Technical Name: — Technical Role: — Technical Phone: — Technical Email:

A Testing Waiver Plan is a schedule for plugging and abandonment of idle wells that extends up to but not more than eight years into the future. If an idle well is scheduled to be plugged and abandoned as part of a Testing Waiver Plan that has been approved by the Division, and the operator is in compliance with the plan, then the operator is not required to meet the requirements of CCR Sections 1772.1, 1772.1.1, or 1772.1.2 for that well.

If an operator fails to complete plugging and abandonment of any well according to the schedule approved by the Division, then the Division may cancel the Testing Waiver Plan. If the Division cancels the Testing Waiver Plan, then the exemptions for testing no longer apply for any of the wells listed in the plan and the operator shall conduct the testing and analysis required under Sections 1772.1, 1772.1.1, and 1772.1.2 for each of the listed wells within 90 days. If the Division has canceled a Testing Waiver Plan, then the Division will not consider a new Testing Waiver Plan for approval unless the operator is in compliance with all of the requirements of Sections 1772.1, 1772.1.1, and 1772.1.2.

I, _____ certify that all data submitted in this plan is true and accurate
Input your name above

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Reviewer: — Review Date: — Waiver No.
Waiver Status: — Revisions Due: — Approval Date:
Date Revisions Received: — 2019 Annual Review Date:
Compliance Due Date:

Required Revisions:

Length of Waiver Plan	
Schedule Priority	
Wellbore deficiency info	

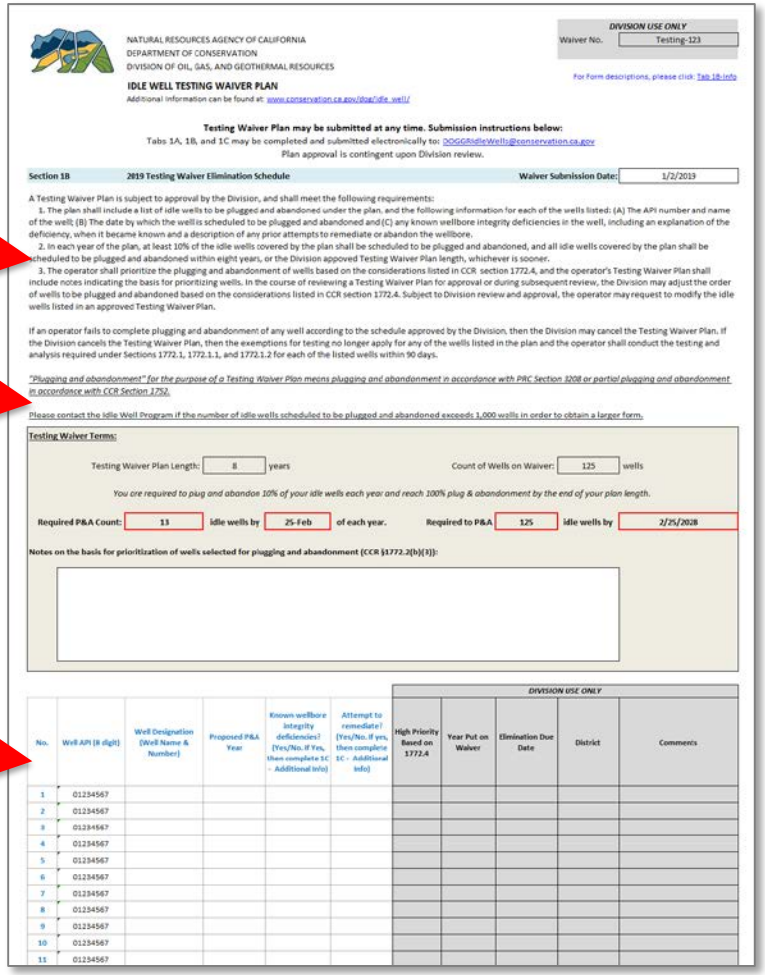
Notes:

Testing Waiver Form
Tab 1B-Testing Waiver

Testing Waiver Plan requirements

Testing Waiver Plan Terms
- Plan Length
- Count of wells on Waiver
- Minimum count of wells to P&A each year.
- Compliance date
- Notes on prioritization

List of Wells on Waiver
- API and Name
- Proposed P&A Year
- Known deficiencies and remediation (Yes/No)



NATURAL RESOURCES AGENCY OF CALIFORNIA
DEPARTMENT OF CONSERVATION
DIVISION OF OIL, GAS, AND GEOTHERMAL RESOURCES

IDLE WELL TESTING WAIVER PLAN

Additional information can be found at: www.conservation.ca.gov/dog/idle_well/

DIVISION USE ONLY
Waiver No. Testing-123

For Form descriptions, please click: Tab 1B-Info

Testing Waiver Plan may be submitted at any time. Submission instructions below:
Tabs 1A, 1B, and 1C may be completed and submitted electronically to: DOGGRIdleWells@conservation.ca.gov
Plan approval is contingent upon Division review.

Section 1B **2019 Testing Waiver Elimination Schedule** **Waiver Submission Date:** 1/2/2019

A Testing Waiver Plan is subject to approval by the Division, and shall meet the following requirements:
1. The plan shall include a list of idle wells to be plugged and abandoned under the plan, and the following information for each of the wells listed: (A) The API number and name of the well; (B) The date by which the well is scheduled to be plugged and abandoned and (C) any known wellbore integrity deficiencies in the well, including an explanation of the deficiency, when it became known and a description of any prior attempts to remediate or abandon the wellbore.
2. In each year of the plan, at least 10% of the idle wells covered by the plan shall be scheduled to be plugged and abandoned, and all idle wells covered by the plan shall be scheduled to be plugged and abandoned within eight years, or the Division appoved Testing Waiver Plan length, whichever is sooner.
3. The operator shall prioritize the plugging and abandonment of wells based on the considerations listed in CCR section 1772.4, and the operator's Testing Waiver Plan shall include notes indicating the basis for prioritizing wells. In the course of reviewing a Testing Waiver Plan for approval or during subsequent review, the Division may adjust the order of wells to be plugged and abandoned based on the considerations listed in CCR section 1772.4. Subject to Division review and approval, the operator may request to modify the idle wells listed in an approved Testing Waiver Plan.

If an operator fails to complete plugging and abandonment of any well according to the schedule approved by the Division, then the Division may cancel the Testing Waiver Plan. If the Division cancels the Testing Waiver Plan, then the exemptions for testing no longer apply for any of the wells listed in the plan and the operator shall conduct the testing and analysis required under Sections 1772.1, 1772.1.1, and 1772.1.2 for each of the listed wells within 90 days.

"Plugging and abandonment" for the purpose of a Testing Waiver Plan means plugging and abandonment in accordance with PRC Section 3208 or partial plugging and abandonment in accordance with CCR Section 1752.

Please contact the Idle Well Program if the number of idle wells scheduled to be plugged and abandoned exceeds 1,000 wells in order to obtain a larger form.

Testing Waiver Terms:

Testing Waiver Plan Length: 8 years Count of Wells on Waiver: 125 wells

You are required to plug and abandon 10% of your idle wells each year and reach 100% plug & abandonment by the end of your plan length.

Required P&A Count: 13 **idle wells by** 25-Feb **of each year.** **Required to P&A** 125 **idle wells by** 2/25/2028

Notes on the basis for prioritization of wells selected for plugging and abandonment (CCR §1772.2(b)(3)):

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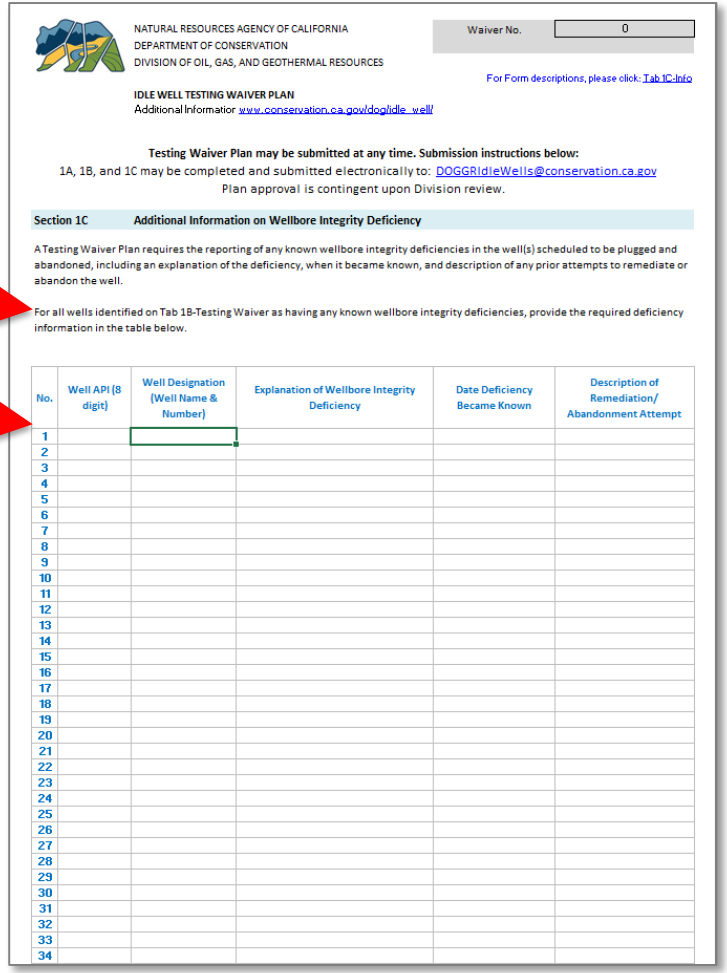
No.	Well API (8 digit)	Well Designation (Well Name & Number)	Proposed P&A Year	Known wellbore integrity deficiencies? (Yes/No. If Yes, then complete 1C - Additional Info)	Attempt to remediate? (Yes/No. If yes, then complete 1C - Additional Info)	High Priority Based on 1772.4	Year Put on Waiver	Elimination Due Date	District	Comments
1	01234567									
2	01234567									
3	01234567									
4	01234567									
5	01234567									
6	01234567									
7	01234567									
8	01234567									
9	01234567									
10	01234567									
11	01234567									

Testing Waiver Form
Tab 1C-Additional Information

Declaration of known mechanical integrity deficiencies requirements

For each well with a known mechanical integrity deficiency:

- Explanation of wellbore integrity deficiency
- Date deficiency became know
- Description of prior attempts to remediate or abandon the well



NATURAL RESOURCES AGENCY OF CALIFORNIA
DEPARTMENT OF CONSERVATION
DIVISION OF OIL, GAS, AND GEOTHERMAL RESOURCES

Waiver No. 0

For Form descriptions, please click: Tab 1C-Info

IDLE WELL TESTING WAIVER PLAN
Additional Informatior www.conservation.ca.gov/doggidle_well/

Testing Waiver Plan may be submitted at any time. Submission instructions below:
1A, 1B, and 1C may be completed and submitted electronically to: DOGGRIdleWells@conservation.ca.gov
Plan approval is contingent upon Division review.

Section 1C Additional Information on Wellbore Integrity Deficiency

A Testing Waiver Plan requires the reporting of any known wellbore integrity deficiencies in the well(s) scheduled to be plugged and abandoned, including an explanation of the deficiency, when it became known, and description of any prior attempts to remediate or abandon the well.

For all wells identified on Tab 1B-Testing Waiver as having any known wellbore integrity deficiencies, provide the required deficiency information in the table below.

No.	Well API (8 digit)	Well Designation (Well Name & Number)	Explanation of Wellbore Integrity Deficiency	Date Deficiency Became Known	Description of Remediation/ Abandonment Attempt
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					
32					
33					
34					

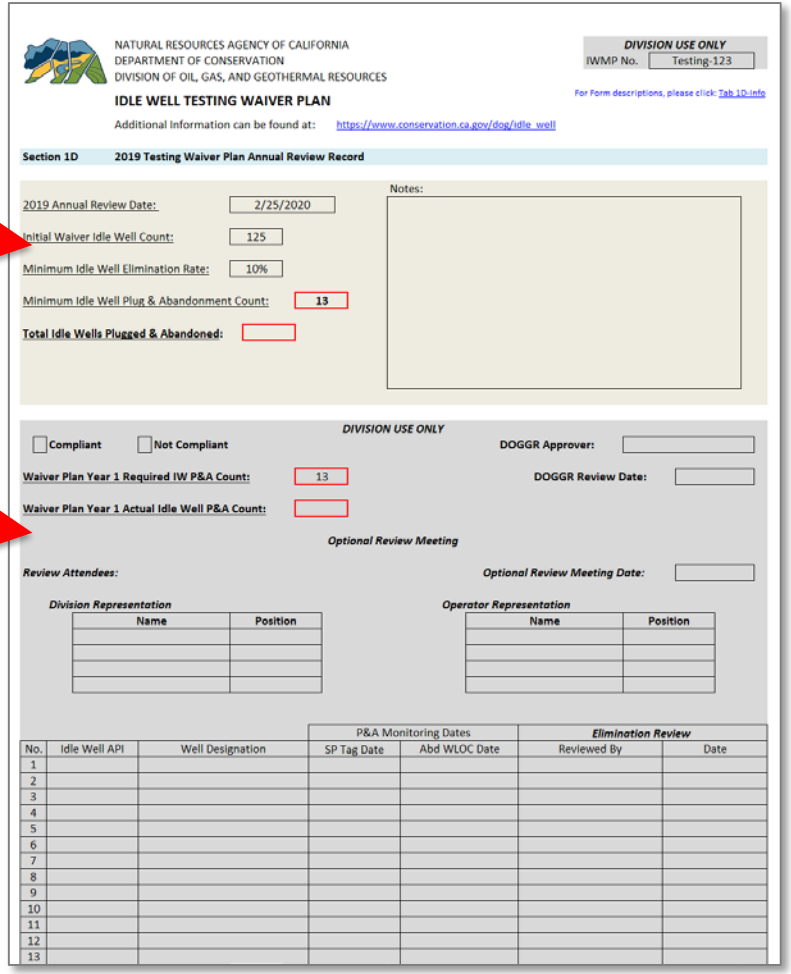
Testing Waiver Form
Tab 1D-Annual Review Record

Annual Review Section

- Annual Review Date
- Total and required well counts

DOGGR Annual Review

- Compliance determination
- Required and actual P&A well counts
- Individual well P&A information
- Optional review meeting information



NATURAL RESOURCES AGENCY OF CALIFORNIA
DEPARTMENT OF CONSERVATION
DIVISION OF OIL, GAS, AND GEOTHERMAL RESOURCES

DIVISION USE ONLY
IWMP No. Testing-123

For Form descriptions, please click: Tab 1D-Info

IDLE WELL TESTING WAIVER PLAN

Additional Information can be found at: https://www.conservation.ca.gov/dog/idle_well

Section 1D 2019 Testing Waiver Plan Annual Review Record

2019 Annual Review Date: 2/25/2020
Initial Waiver Idle Well Count: 125
Minimum Idle Well Elimination Rate: 10%
Minimum Idle Well Plug & Abandonment Count: 13
Total Idle Wells Plugged & Abandoned:

Notes:

DIVISION USE ONLY

Compliant Not Compliant

DOGGR Approver:

Waiver Plan Year 1 Required IW P&A Count: 13

DOGGR Review Date:

Waiver Plan Year 1 Actual Idle Well P&A Count:

Optional Review Meeting

Review Attendees:

Optional Review Meeting Date:

Division Representation

Name	Position

Operator Representation

Name	Position

No.	Idle Well API	Well Designation	P&A Monitoring Dates		Elimination Review	
			SP Tag Date	Abd WLOC Date	Reviewed By	Date
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						

THANK YOU

Questions?

Presenter Name
Presenter Email

Testing Compliance Work Plan

CCR §1772.1.4

Topics

1. **What is the Testing Compliance Work Plan?**
    - Requirements and Compliance
    - Relationship with other regulatory requirements
2. **Approval Process**
3. **Annual Review Process**
4. **Compliance Work Plan Amendments**
5. **Workplan Form**

What is the Testing Compliance Work Plan?

"Notwithstanding the timeframes specified in [CCR] Section 1772.1(a)(2) and (a)(3), for all wells that are idle wells as of April 1,2019, the operator shall conduct a pressure test and clean out tag as described under those subdivisions by April 1, 2025, unless the well is plugged and abandoned, partially plugged and abandoned, or scheduled for plugging and abandonment under an approved Idle Well Management Plan or Testing Waiver Plan. By June 1, 2019, the operator shall provide the Division with a Testing Compliance Work Plan that schedules completion of this testing over the six-year period in accordance with the requirements of this section." CCR §1772.1.4.

Simply put…

- All operators have 6 years to bring their existing idle wells into compliance with the casing pressure test and clean out tag requirements.

What is the Testing Compliance Work Plan?
Requirements and Compliance

The Testing Compliance Work Plan shall schedule:

- A pressure test for each well that is an idle well as of April 1, 2019.
- A clean out tag for each well that is an idle well for two or more years as of April 1, 2019.

The Testing Compliance Work Plan shall include:

- Notes indicating the basis for prioritizing wells.

Testing shall be completed on at least:

- 5% of all wells by 4/1/2020
- 15% of all wells by 4/1/2021
- 30% of all wells by 4/1/2022
- 50% of all wells by 4/1/2023
- 75% of all wells by 4/1/2024
- All wells by 4/1/2025
- *At least 1 well shall be scheduled for testing each year until initial testing is completed on all wells covered by the Compliance Work Plan.*

What is the Testing Compliance Work Plan?
Requirements and Compliance

How are the annual benchmarks met?

- The well is tested as required and ***passes***.
  - If the well is compliant, well counts toward the annual benchmark
  - All subsequent testing conducted in accordance with the timeframes specified in CCR Section 1772.1(a)(2) and (a)(3).
- The well is tested as required and ***does not pass***.
  - If the well is brought into Bring the well into compliance, the well counts toward the annual benchmark.
  - Plugging and abandonment in accordance with PRC Section 3208 or partial plugging and abandonment in accordance with CCR Section 1752 of a well amounts to completion of testing and counts towards the annual benchmark.
- Testing conducting prior to April 1, 2019 will be accepted for compliance provided that the test was conducted in accordance with the parameters specified in CCR Sections 1772.1 and 1772.1.1.

What is the Testing Compliance Work Plan?
Relationship with IWMP and Testing Waiver

Idle Well Management Plan

Wells scheduled to be P&A'd

- Excluded from Testing Compliance Work Plan
- Excluded from requirements of CCR Sections 1772.1, 1772.1.1, and 1772.1.2

Wells scheduled for Return-to-Use

- Included in Testing Compliance Work Plan
- Required to comply with requirements of CCR Sections 1772.1, 1772.1.1, and 1772.1.2

Testing Waiver Plan

Wells scheduled to be P&A'd

- Excluded from Testing Compliance Work Plan
- Excluded from requirements of CCR Sections 1772.1, 1772.1.1, and 1772.1.2

What is the Testing Compliance Work Plan?
Relationship with Fluid Levels and 15-Year Engineering Analysis

California Department of Conservation

Fluid Levels

Fluid levels are not included as part of the Testing Compliance Work Plan.

- All wells idle on or before April 1, 2019 have until April 1, 2021 to come into compliance with Section 1772.1 (a)(1).

After April 1, 2025, the first fluid level above an USDW triggers a casing pressure test within 90 days.

15-Year Engineering Analysis

For wells that as of April 1, 2019, have met the definition of an idle well for nine or more years, the operator shall provide the engineering analysis described in Section 1772.1.2 to the Division by the later of the following:

- Within 60 days after the date the pressure testing on the idle well is scheduled in the operator's Testing Compliance Work Plan; or
- By the end of the month in which the idle well has been idle for 15 years.

Approval Process

1. Submit the Testing Compliance Work Plan form to DOGGRIdleWells@conservation.ca.gov
    - **Due by June 1, 2019**
2. DOGGR reviews the proposed Work Plan for:
    - Wells counts and minimum annual testing requirements.
    - Notes on the basis for prioritizing wells and schedule of wells.
    - Exclusion of wells scheduled for P&A under an approved IWMP and Waiver.
3. DOGGR returns the Work Plan:
    - Approved – Testing Compliance Work Plan approved.
    - Contingent on Revision – Revision to the Work Pan are required before DOGGR approval.
        - Types of revisions: Well counts, annual testing requirements, and well prioritization.

Annual Review Process

The Annual Review is conducted as of April 1 of each year.

1. DOGGR reviews the database for all wells schedule for testing under the Work Plan.
    - Test results uploaded to WellSTAR
    - Confirmation of plugging and abandonment or partial plugging and abandonment
    - Confirmation of scheduling of well for P&A under an approved IWMP or Testing Waiver.
2. DOGGR documents review results and notifies operator of annual review results.
    - Compliant – Letter documenting compliance and includes instructions for updating the Work Plan for the next year. Updating may include revision of the prioritization of wells.
    - Non-Compliant – Letter documenting non-compliance.
        - Each well that the operator failed to test constitutes a separate violation and is subject to the requirements of CCR Section 1772.1(b).
    - Operator may request an in-person review of the results.

Compliance Work Plan Amendments

Wells that are transferred from one operator to another after April 1, 2019:

- The operator shall submit a revised Testing Compliance Work Plan to the Division within 90 days.

Wells that are scheduled for plugging and abandonment under an approved Idle Well Management Plan or Test Waiver Plan after April 1, 2019:

- The operator shall submit a revised Testing Compliance Work Plan to the Division within 90 days.

Testing Compliance Work Plan Form

The Testing Compliance Work Plan form can be downloaded from the DOGGR Idle Well Program webpage.

- The form will automatically calculate the number of wells that require testing each year based on the number of wells included in the Compliance Work Plan schedule.

The Testing Compliance Work Plan inventory can be downloaded from the DOGGR Idle Well Program webpage.

- Includes all wells that met the definition of idle well on or before April 1, 2019.
- The required testing for each well is identified.
- Whether the casing pressure test triggers the due date for the 15-Year Engineering Analysis is identified.
- The inventory is formatted so that it can be copied and pasted directly into the form.

Compliance Work Plan Form

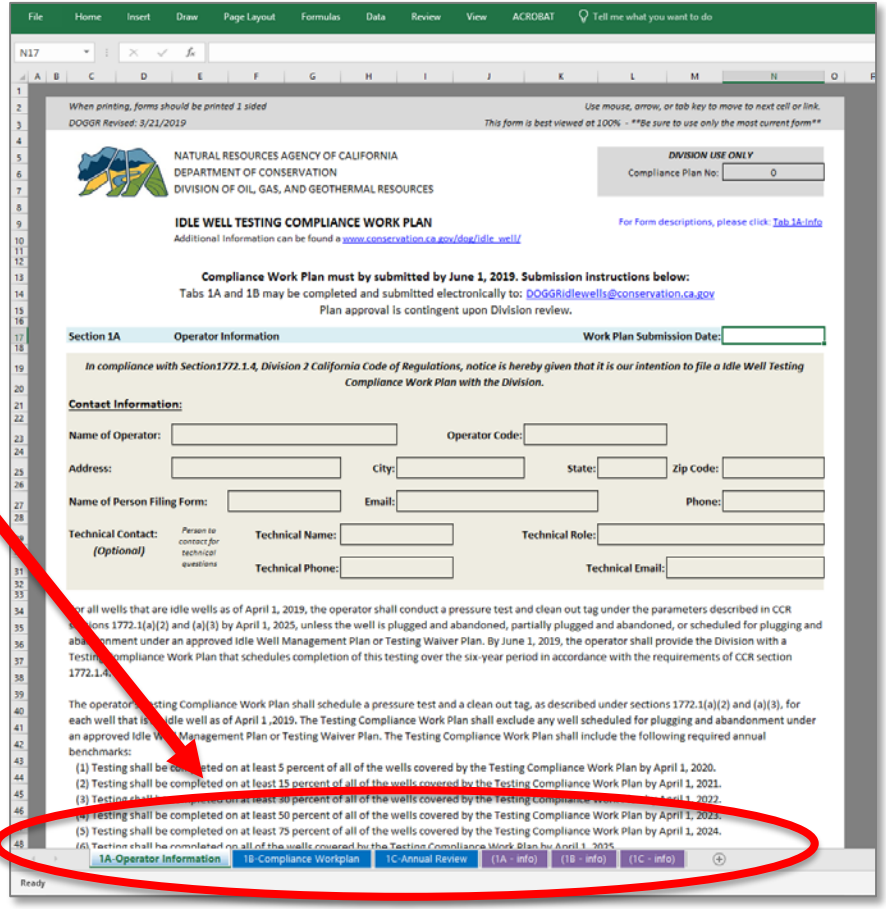
Microsoft Excel™ file

Comprised of 3 tabs

- 1A-Operator Information
- 1B-Compliance Workplan
- 1C-Annual Review

Associated information tabs for each section of the form.

The representative electric log, structural contour map, and casing diagrams are to be submitted as attachments.



Compliance Work Plan Form
Tab 1A-Operator Information

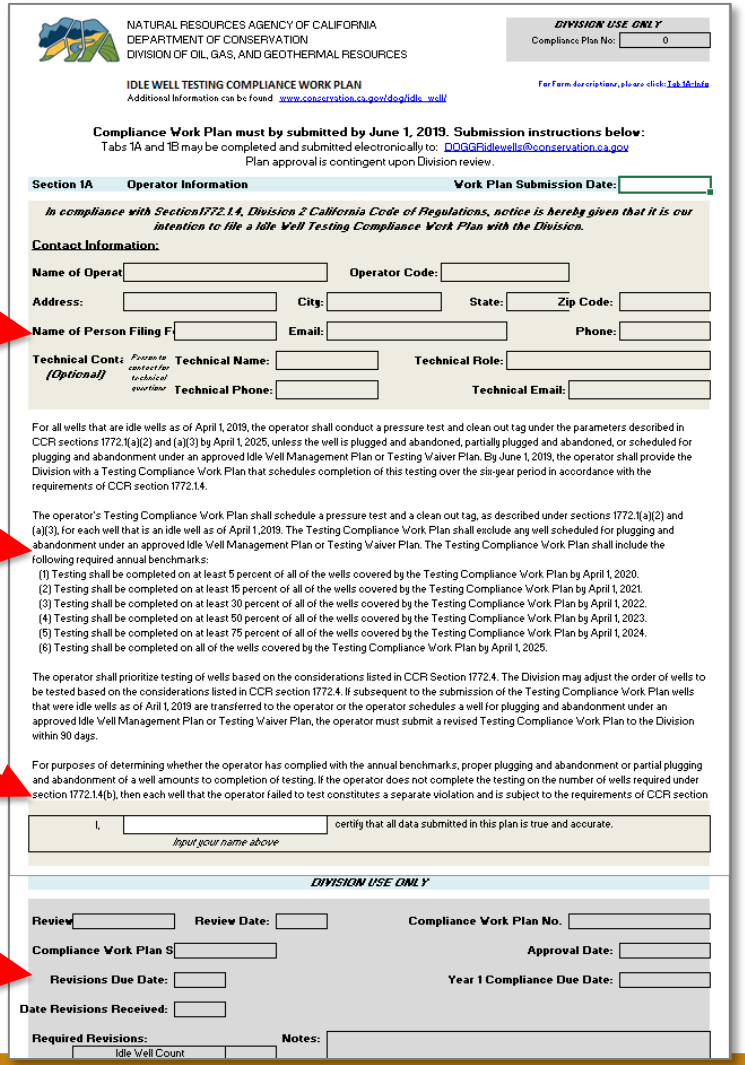
Contact Information Section

Compliance Work Plan requirements

Certification of plan accuracy

DOGGR Review Section

- Contains notes on Work Plan approval and due dates



NATURAL RESOURCES AGENCY OF CALIFORNIA
DEPARTMENT OF CONSERVATION
DIVISION OF OIL, GAS, AND GEOTHERMAL RESOURCES

DIVISION USE ONLY
Compliance Plan No: 0

IDLE WELL TESTING COMPLIANCE WORK PLAN
Additional Information can be found www.conservation.ca.gov/dog/idle_well/

For Form descriptions, please click: Tab 1A-Info

Compliance Work Plan must by submitted by June 1, 2019. Submission instructions below:
Tabs 1A and 1B may be completed and submitted electronically to: DOGGRidlewells@conservation.ca.gov
Plan approval is contingent upon Division review.

Section 1A **Operator Information** **Work Plan Submission Date:**

In compliance with Section1772.1.4, Division 2 California Code of Regulations, notice is hereby given that it is our intention to file a Idle Well Testing Compliance Work Plan with the Division.

Contact Information:

Name of Operat | Operator Code:

Address: | City: | State: | Zip Code:

Name of Person Filing F | Email: | Phone:

Technical Cont (Optional) Person to contact for technical questions | Technical Name: | Technical Role:

Technical Phone: | Technical Email:

For all wells that are idle wells as of April 1, 2019, the operator shall conduct a pressure test and clean out tag under the parameters described in CCR sections 1772.1(a)(2) and (a)(3) by April 1, 2025, unless the well is plugged and abandoned, partially plugged and abandoned, or scheduled for plugging and abandonment under an approved Idle Well Management Plan or Testing Waiver Plan. By June 1, 2019, the operator shall provide the Division with a Testing Compliance Work Plan that schedules completion of this testing over the six-year period in accordance with the requirements of CCR section 1772.1.4.

The operator's Testing Compliance Work Plan shall schedule a pressure test and a clean out tag, as described under sections 1772.1(a)(2) and (a)(3), for each well that is an idle well as of April 1, 2019. The Testing Compliance Work Plan shall exclude any well scheduled for plugging and abandonment under an approved Idle Well Management Plan or Testing Waiver Plan. The Testing Compliance Work Plan shall include the following required annual benchmarks:

(1) Testing shall be completed on at least 5 percent of all of the wells covered by the Testing Compliance Work Plan by April 1, 2020.
(2) Testing shall be completed on at least 15 percent of all of the wells covered by the Testing Compliance Work Plan by April 1, 2021.
(3) Testing shall be completed on at least 30 percent of all of the wells covered by the Testing Compliance Work Plan by April 1, 2022.
(4) Testing shall be completed on at least 50 percent of all of the wells covered by the Testing Compliance Work Plan by April 1, 2023.
(5) Testing shall be completed on at least 75 percent of all of the wells covered by the Testing Compliance Work Plan by April 1, 2024.
(6) Testing shall be completed on all of the wells covered by the Testing Compliance Work Plan by April 1, 2025.

The operator shall prioritize testing of wells based on the considerations listed in CCR Section 1772.4. The Division may adjust the order of wells to be tested based on the considerations listed in CCR section 1772.4. If subsequent to the submission of the Testing Compliance Work Plan wells that were idle wells as of Aril 1, 2019 are transferred to the operator or the operator schedules a well for plugging and abandonment under an approved Idle Well Management Plan or Testing Waiver Plan, the operator must submit a revised Testing Compliance Work Plan to the Division within 90 days.

For purposes of determining whether the operator has complied with the annual benchmarks, proper plugging and abandonment or partial plugging and abandonment of a well amounts to completion of testing. If the operator does not complete the testing on the number of wells required under section 1772.1.4(b), then each well that the operator failed to test constitutes a separate violation and is subject to the requirements of CCR section

I, | certify that all data submitted in this plan is true and accurate.
Input your name above

DIVISION USE ONLY

Review | Review Date: | Compliance Work Plan No.

Compliance Work Plan S | Approval Date:

Revisions Due Date: | Year 1 Compliance Due Date:

Date Revisions Received:

Required Revisions: | Notes:

Idle Well Count

Compliance Work Plan Form
Tab 1B-Compliance Workplan

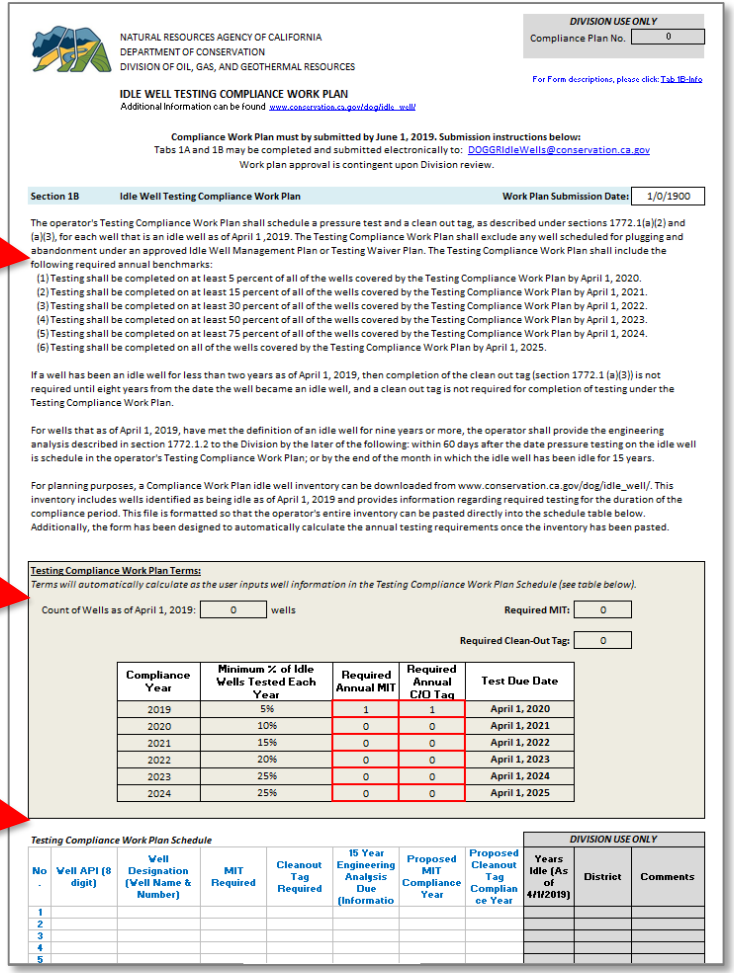
Compliance Work Plan requirements

Testing Waiver Plan Terms

- Plan Length
- Count of wells on plan
- Minimum count of wells to test (MIT and Clean Out Tag) each year.
- Compliance date

List of Wells on Compliance Work Plan

- API and Name
- Proposed Test Year for MIT and Clean Out Tag



NATURAL RESOURCES AGENCY OF CALIFORNIA
DEPARTMENT OF CONSERVATION
DIVISION OF OIL, GAS, AND GEOTHERMAL RESOURCES

DIVISION USE ONLY
Compliance Plan No: 0

For Form descriptions, please click: Tab 1B-Info

IDLE WELL TESTING COMPLIANCE WORK PLAN
Additional Information can be found www.conservation.ca.gov/dog/idle_well/

Compliance Work Plan must by submitted by June 1, 2019. Submission instructions below:
Tabs 1A and 1B may be completed and submitted electronically to: DOGGRIdleWells@conservation.ca.gov
Work plan approval is contingent upon Division review.

Section 1B **Idle Well Testing Compliance Work Plan** **Work Plan Submission Date:** 1/0/1900

The operator's Testing Compliance Work Plan shall schedule a pressure test and a clean out tag, as described under sections 1772.1(a)(2) and (a)(3), for each well that is an idle well as of April 1 ,2019. The Testing Compliance Work Plan shall exclude any well scheduled for plugging and abandonment under an approved Idle Well Management Plan or Testing Waiver Plan. The Testing Compliance Work Plan shall include the following required annual benchmarks:

(1) Testing shall be completed on at least 5 percent of all of the wells covered by the Testing Compliance Work Plan by April 1, 2020.
(2) Testing shall be completed on at least 15 percent of all of the wells covered by the Testing Compliance Work Plan by April 1, 2021.
(3) Testing shall be completed on at least 30 percent of all of the wells covered by the Testing Compliance Work Plan by April 1, 2022.
(4) Testing shall be completed on at least 50 percent of all of the wells covered by the Testing Compliance Work Plan by April 1, 2023.
(5) Testing shall be completed on at least 75 percent of all of the wells covered by the Testing Compliance Work Plan by April 1, 2024.
(6) Testing shall be completed on all of the wells covered by the Testing Compliance Work Plan by April 1, 2025.

If a well has been an idle well for less than two years as of April 1, 2019, then completion of the clean out tag (section 1772.1 (a)(3)) is not required until eight years from the date the well became an idle well, and a clean out tag is not required for completion of testing under the Testing Compliance Work Plan.

For wells that as of April 1, 2019, have met the definition of an idle well for nine years or more, the operator shall provide the engineering analysis described in section 1772.1.2 to the Division by the later of the following: within 60 days after the date pressure testing on the idle well is schedule in the operator's Testing Compliance Work Plan; or by the end of the month in which the idle well has been idle for 15 years.

For planning purposes, a Compliance Work Plan idle well inventory can be downloaded from www.conservation.ca.gov/dog/idle_well/. This inventory includes wells identified as being idle as of April 1, 2019 and provides information regarding required testing for the duration of the compliance period. This file is formatted so that the operator's entire inventory can be pasted directly into the schedule table below. Additionally, the form has been designed to automatically calculate the annual testing requirements once the inventory has been pasted.

Testing Compliance Work Plan Terms:
Terms will automatically calculate as the user inputs well information in the Testing Compliance Work Plan Schedule (see table below).

Count of Wells as of April 1, 2019: 0 wells
Required MIT: 0
Required Clean-Out Tag: 0

Compliance Year	Minimum % of Idle Wells Tested Each Year	Required Annual MIT	Required Annual C/O Tag	Test Due Date
2019	5%	1	1	April 1, 2020
2020	10%	0	0	April 1, 2021
2021	15%	0	0	April 1, 2022
2022	20%	0	0	April 1, 2023
2023	25%	0	0	April 1, 2024
2024	25%	0	0	April 1, 2025

Testing Compliance Work Plan Schedule

DIVISION USE ONLY

No.	Well API (8 digit)	Well Designation (Well Name & Number)	MIT Required	Cleanout Tag Required	15 Year Engineering Analysis Due (Informatio	Proposed MIT Compliance Year	Proposed Cleanout Tag Compliance Year	Years Idle (As of 4/1/2019)	District	Comments
1										
2										
3										
4										
5										

Compliance Work Plan Form
Tab 1C-Annual Review Record

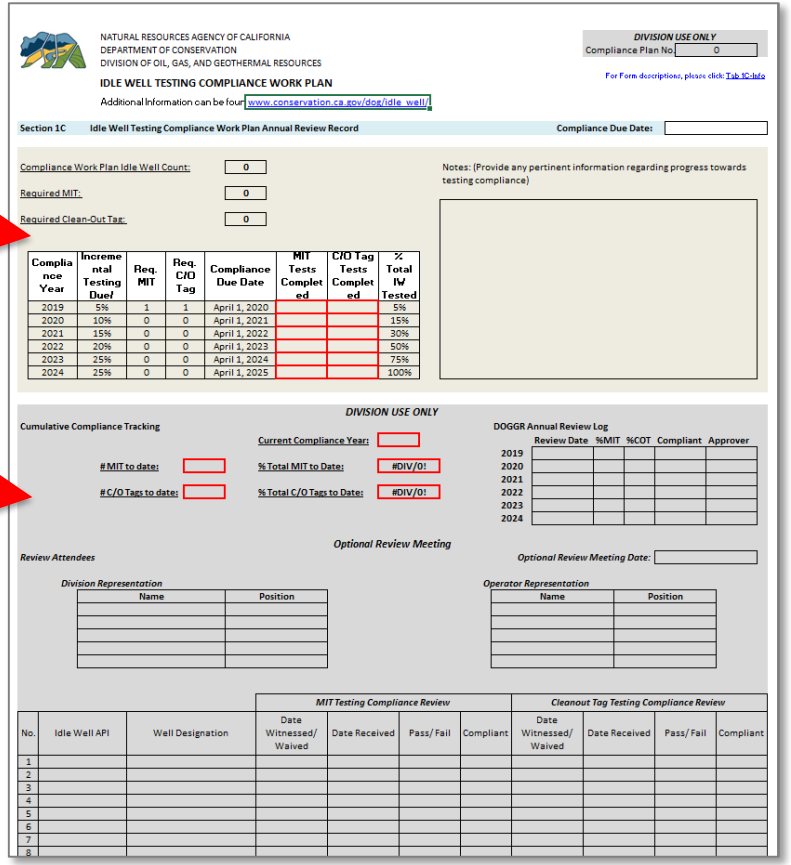
California Department of Conservation

Annual Review Section

- Annual Review Date
- Total and required well counts
- Notes on compliance

DOGGR Annual Review

- Compliance determination
- Required and actual test counts
- Individual well test information
- Optional review meeting information



NATURAL RESOURCES AGENCY OF CALIFORNIA
DEPARTMENT OF CONSERVATION
DIVISION OF OIL, GAS, AND GEOTHERMAL RESOURCES

IDLE WELL TESTING COMPLIANCE WORK PLAN

Additional Information can be found: www.conservation.ca.gov/dog/idle_well/

DIVISION USE ONLY
Compliance Plan No. 0

For Form descriptions, please click: Tab 1C-Info

Section 1C Idle Well Testing Compliance Work Plan Annual Review Record — Compliance Due Date:

Compliance Work Plan Idle Well Count: 0
Required MIT: 0
Required Clean-Out Tag: 0

Notes: (Provide any pertinent information regarding progress towards testing compliance)

Compliance Year	Incremental Testing Due	Req. MIT	Req. C/O Tag	Compliance Due Date	MIT Tests Completed	C/O Tag Tests Completed	% Total IW Tested
2019	5%	1	1	April 1, 2020			5%
2020	10%	0	0	April 1, 2021			15%
2021	15%	0	0	April 1, 2022			30%
2022	20%	0	0	April 1, 2023			50%
2023	25%	0	0	April 1, 2024			75%
2024	25%	0	0	April 1, 2025			100%

DIVISION USE ONLY

Cumulative Compliance Tracking

Current Compliance Year:
MIT to date: — % Total MIT to Date: #DIV/0!
C/O Tags to date: — % Total C/O Tags to Date: #DIV/0!

DOGGR Annual Review Log

	Review Date	%MIT	%COT	Compliant	Approver
2019					
2020					
2021					
2022					
2023					
2024					

Optional Review Meeting

Review Attendees — Optional Review Meeting Date:

Division Representation

Name	Position

Operator Representation

Name	Position

			MIT Testing Compliance Review				Cleanout Tag Testing Compliance Review			
No.	Idle Well API	Well Designation	Date Witnessed/ Waived	Date Received	Pass/ Fail	Compliant	Date Witnessed/ Waived	Date Received	Pass/ Fail	Compliant
1										
2										
3										
4										
5										
6										
7										
8										

THANK YOU

Questions?

Presenter Name
Presenter Email

Idle Well Testing

CCR §1772.1

Topics

1. Testing Overview
2. Fluid Levels
3. Casing Pressure Tests
4. Clean Out Tags
5. Failed Tests
6. Low-Priority Idle Wells
7. USDW Guidance
8. Inaccessible Idle Wells
9. Submitting Test Results to WellSTAR

Testing Overview

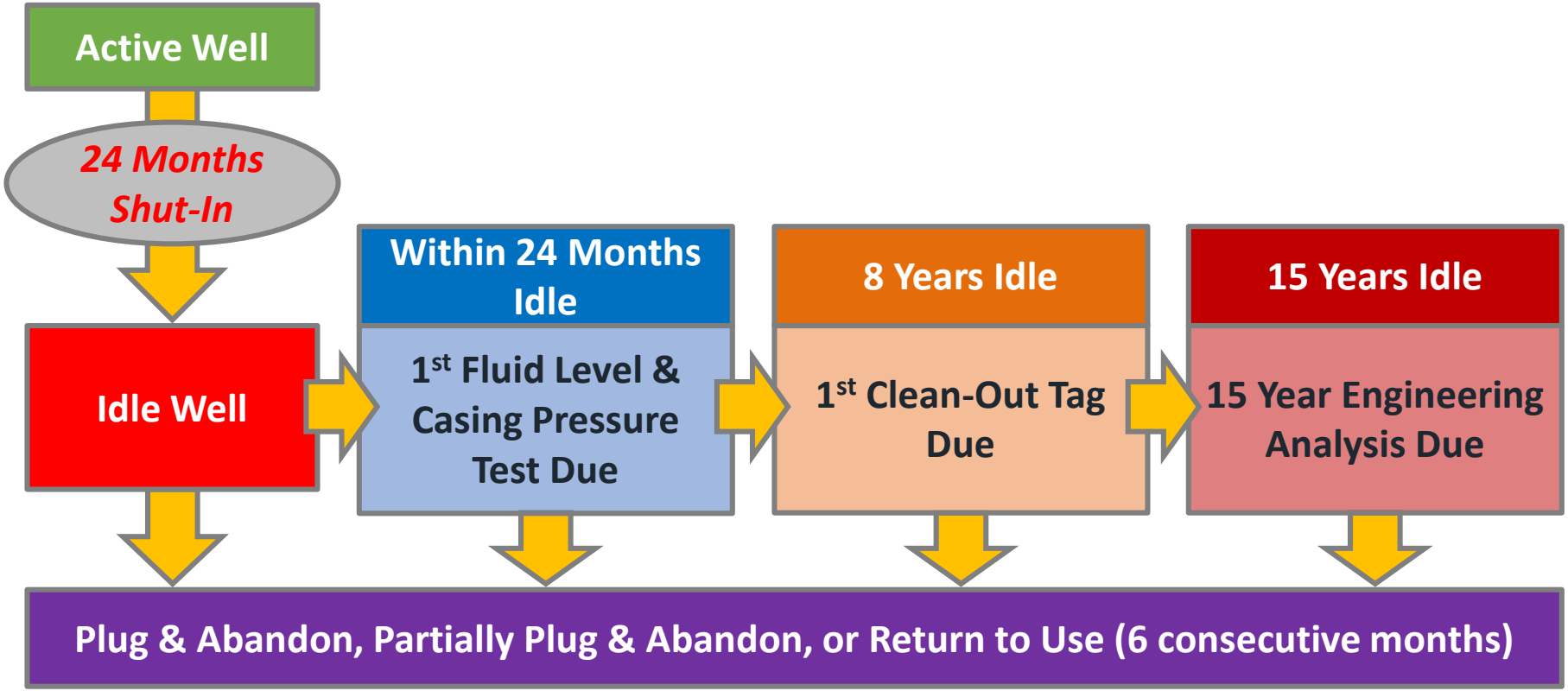
Required Testing

- *Fluid Level*
  - Due within 24 months of a well becoming an idle well.
- *Casing Pressure Test*
  - Due within 24 months of a well becoming an idle well.
- *Clean Out Tag*
  - Due within eight years of a well becoming an idle well.
- *Engineering Analysis*
  - Due within 15 years of a well becoming an idle well.

Other Requirements

- The operator shall give the appropriate district office 24 hours' notice so that a Division inspector may witness the testing.
- Test results shall be submitted to the Division in a digital format within 60 days of the date the test is conducted.
  - Fluid Level results indicating the fluid is, or is presumed to be, above the base of USDW, shall be submitted within 30 days.

Testing Overview



Fluid Levels (CCR § 1772.1(a)(1))

California Department of Conservation

Due within 24 months of a well becoming an idle well.

Method: Acoustical, Mechanical, or other reliable method

Purpose: To determine whether the fluid is above the base of USDW.

- If the operator has not demonstrated the location of the base of USDW, then it shall be presumed that the fluid is above base of USDW.
- If the operator demonstrates that the wellbore does not penetrate as USDW, then the fluid-level test is not required.

Repeat Testing: At least once every 24 months for as long as the well is an idle well.

Other Information:

- After April 1, 2025, the first fluid-level test indicating that fluid is, or presumed to be, above base of USDW triggers as casing pressure test as described in Section 1772.1(a)(2).
- For wells that met the definition of idle well on or before April 1, 2019, the fluid level is not due until April 1, 2021.

Casing Pressure Tests (CCR § 1772.1(a)(2))

California Department of Conservation

Due within 24 months of a well becoming an idle well.

Method: Pressure test with fluid

- Other methods requiring Division approval:
  - Inert Gas Depression Testing
  - Alternative Testing Methods
  - Passive Testing (Low-priority idle wells)

Purpose: To demonstrate mechanical integrity.

Repeat Testing: Varies depending on test pressure and approved method.

If the well cannot be safely and effectively tested as required, then the well shall be deemed to have failed the pressure test.

The operator shall conduct the test from surface to a depth that is:

- 100 feet MD above the uppermost perforation,
- Immediately above the casing shoe of the deepest cemented casing,
- Or immediately above the top of the landed liner, whichever is highest.
  - If the top of the landed liner is 100 feet or more above the cemented casing shoe, then the pressure test shall be to a depth specified by the Division on a case-by-case basis.

Casing Pressure Tests (CCR § 1772.1(a)(2))

Repeat Testing Frequency

Method: Pressure test with fluid

- Pressure test at 200 psi above surface pressure, then repeat within 48 months.
- Pressure test at 500 psi above surface pressure, then repeat within 72 months.
- Pressure test at 1,000 psi above surface pressure, then repeat within 96 months.

Method: Inert Gas Depression Test, Alternative Testing Methods, or Passive Testing

- Repeat within 48 months.

Casing Pressure Tests (CCR § 1772.1(a)(2) and §1772.1.1(a))

California Department of Conservation

Pressure Testing Parameters

- Pressure tests shall be conducted at an initial pressure of at least 200 psi above surface pressure.
- A pressure test is successful if the pressure gauge does not show more than a 3% change from the initial test pressure over a continuous 30-minute period.
    - If the well is within the area of review for a cyclic steam injection well or a steamflood injection well, then an increase in pressure of as much as 10% is a successful test.
- Pressure tests shall be recorded and a calibrated gauge shall be used that can record the pressure with an accuracy within 1% of the test pressure.
    - If an analog gauge is used, then the test pressure shall be within the mid-range scale of the gauge.
- Pressure shall be recorded at least once per minute during the test.
- The charts or digital recording of the pressures during the testing shall be provided to the Division upon request.

Casing Pressure Tests (CCR § 1772.1.1(b))

California Department of Conservation

Inert Gas Depression Testing

- The operator may conduct an inert gas depression test to satisfy the pressure testing requirements of Sections 1752, 1772.1, or 1772.5, unless the computed necessary pressure under 1772.1.1(b)(1) is less than 500 psi.
  - In order to satisfy the requirements, the test must be conducted to the same pressure at depth.
- In order for the test to be successful, the fluid level must be depressed to a depth within 100 feet MD above the uppermost perforation, immediately above the casing shoe of the deepest cemented casing, or immediately above the top of the landed line whichever is highest. The fluid level must be static and the pressure must stabilize with a change of no more than 1% over a continuous 60-minute period.
- Pressure tests shall be recorded and a calibrated gauge shall be used that can record a pressure with an accuracy within 1% of the test pressure.
  - If an analog gauge is used, then the test pressure shall be within the mid-range scale of the gauge.
- Pressure shall be recorded at least once per minute during the test.
- The test results shall be submitted in a digital tabular format, along with all fluid-level measurements taken, the estimation of the specific gravity of the fluid in the well, and the computation of pressure necessary to displace fluid to the correct depth.

Casing Pressure Tests (CCR § 1772.1.1(c) and (d))

Alternate Testing Methods

- An alternate mechanical integrity testing method may be used to satisfy the pressure testing requirements if the alternate testing method has been approved by the Division as being at least as effective as pressure testing to demonstrate the integrity of the well.
- Examples include:
  - Casing wall thickness inspection using magnetic flux or ultrasonic technologies
  - Combination of ultrasonic imaging tools and a cement evaluation log

Passive Testing

- If a well is a low-priority idle well, then the operator may satisfy the pressure testing requirements by conducting a caliper survey, provided that the Division has approved the testing protocols as effective for evaluating well integrity.

Clean Out Tags (CCR § 1772.1(a)(3))

California Department of Conservation

Due within 8 years of becoming an idle well.

Method: Open-ended tubing or a gauge ring demonstrated to be of the minim diameter of the tubing necessary to properly plug and abandon the well.

Purpose: To determine the ability to reach the current Division-approved depth of the well.

Repeat Testing: At least once every 48 months for as long as the well is an idle well.

- Or at a lesser frequency approved by the Division on a case-by-case basis based on the successful results of previous testing and consideration of the factors described in Section 1772.4

Other Information:

- The Division may require more frequent clean outs if known field or geologic conditions indicate risk to the mechanical integrity of the well.

Failed Tests

In addition to any other penalty or remedial requirement imposed by the Division, within 12 months of failing to successfully complete testing under CCR Section 1772.1(a)(2) or (3), or otherwise failing to comply with a requirement of CCR Section 1772.1, the operator shall do one of the following:

- Bring the well into compliance;
- Partially plug and abandon the well in accordance with CCR Section 1752;
- Plug and abandon the well in accordance with PRC section 3208;
- Or schedule the well for plugging and abandonment under an approved Idle Well Management Plan or an approved Testing Waiver Plan.
    - Submit an amendment to either plan to the HQ Idle Well Program for approval.

Low-Priority Idle Wells (CCR § 1760(p))

“Low-priority idle well” means an idle well for which it has been demonstrated:

(1) Does not penetrate a USDW;

(2) Does not indicate any pressure at the surface and is not open to the atmosphere;

(3) Is not in an area of known geologic hazards, such as subsidence, landslides, or a history of damage to wells in the area from seismicity; and

(4) Is not a critical well, is not in an urban area, and does not have an environmentally sensitive wellhead.

How is this demonstrated?

- Compile documentation and submit to the HQ Idle Well Program.
- Data will be verified through the appropriate District office.

USDW Guidance

California Department of Conservation

Preferred Method:

- Direct sampling and chemical analysis.
- Demonstration in part of an approved aquifer exemption.

Alternative Methods:

- Salinity calculations from e-logs.
    1. Resistivity Ratio Method
    2. Spontaneous Potential Method
    3. Archie Equation
- If lacking logs at the idle well, then provide a demonstration that no well within ½ mile penetrates a USDW from either direct measurement or e-log calculations.

How is this demonstrated?

- Submit documentation to the HQ Idle Well Program.

Inaccessible Idle Wells

- Demonstrate for the Division's approval that the operator has made a diligent effort to locate and access the well and that it is infeasible to physically access the well.
- Submit a plan for the Division's review and approval to ensure that any hazards posed by the well are identified and addressed so as to prevent damage to life, health, property, and natural resources.
    - Ongoing monitoring of the well
    - Response to any indication that the well is discharging reservoir fluids to the surface or otherwise posing a threat
    - Planning and commitment to plug and abandon the well in accordance with PRC section 3208 as soon as possible should it ever become accessible
    - Periodic reporting to the Division on the implementation of the plan.

How is this demonstrated?

- Contact the HQ Idle Well Program, more information to come summer 2019.

Submitting Test Results to WellSTAR

- Instructions are available on DOGGR's WellSTAR webpage:
  https://www.conservation.ca.gov/dog/for_operators/Pages/WellSTAR-Release-3-Training-Materials.aspx

- Included in training materials for Facility Management
  - Maintain Facility: Upload Test Results, page 102

THANK YOU

Questions?

Presenter Name
Presenter Email

15-Year Engineering Analysis

CCR §1772.1.2

Topics

1. **What is the 15-Year Engineering Analysis?**
    - Requirements and Compliance
    - Due date and Relationship with the Compliance Workplan
    - Relationship with IWMP and Testing Waiver Program
3. **Review Process**
    - Viable Determinations
    - Not Viable Determinations
2. **15-Year Engineering Analysis Form**

What is the 15-Year Engineering Analysis?

"By the end of the month in which an idle well has been idle for 15 years, the operator shall provide the Division with an engineering analysis demonstrating to the Division's satisfaction that it is viable to return the well to operation in the future. The engineering analysis shall document that the well could be used to access potential oil and gas reserves and that it has mechanical integrity as demonstrated by pressure testing and a clean out tag as required under Section 1772.1 (a)(2) and (a)(3)." (CCR §1772.1.2)

Simply put…

- It is a demonstration that the well has mechanical integrity, can be properly plugged and abandoned, and has a future purpose.

What is the 15-Year Engineering Analysis?
Requirements and Compliance

The Engineering Analysis requires:

- The well be in compliance with the casing pressure test required under CCR Section 1772.1(a)(2).

  AND

- The well be in compliance with the clean out tag required under CCR Section 1772.1(a)(3).

What is the 15-Year Engineering Analysis?
Requirements and Compliance

The Engineering Analysis shall include:

- The API number and name of the well.
- Statement of the potential future use for the idle well.
- Identification of each reservoir unit that might be accessed and the reservoir characteristics of each of the identified reservoir units.
- A representative electric log to a depth below the deepest producing zone, identifying all geologic units, formations, USDWs, freshwater aquifers, oil or gas zones, and each reservoir unit to be utilized.
- Structural contour map drawn on a geologic marker at or near the top of each reservoir unit to be utilized indicating faults, other lateral containment features, and areal extend of the productive zone.
- All the data specified in CCR Section 1772.1.3 (Casing Diagrams), provided in the form of a graphical casing diagram or flat file data sets.

What is the 15-Year Engineering Analysis?
Requirements and Compliance

California Department of Conservation

Compliance

- If the Division determines upon initial review of an engineering analysis that it is not viable to return the well to operation in the future, then the Division will inform the operator of the basis of that determination and allow the operator *at least 30 days* to provide additional information to substantiate that the well is viable to return to operation in the future.
- If the Division determines upon final review of the engineering analysis and any additional information provided by the operator that it is not viable to return a well to operation in the future, then the Division will provide a notice of final determination to the operator.
    - The operator shall either plug and abandon the well in accordance with Public Resources Code section 3208 within 12 months of receiving the notice of final determination, or schedule the well for plugging and abandonment under an approved Idle Well Management Plan or an approved Testing Waiver Plan.

What is the 15-Year Engineering Analysis?
Requirements and Compliance

California Department of Conservation

Compliance Simplified

- If based on the information provided by the operator, the Division determines that the well is not viable to return to operation in the future:
    1. The Division will notify the operator and include the reasoning for the determination.
    2. The operator will have at least 30 days to provide additional information.
- If the additional information does not substantiate that the well is viable to return to operation:
    1. The Division will provide a Notice of Final Determination.
    2. The operator shall either plug and abandon the well in accordance with Public Resources Code section 3208 within 12 months of receiving the notice of final determination, or schedule the well for plugging and abandonment under an approved Idle Well Management Plan or an approved Testing Waiver Plan.

What is the 15-Year Engineering Analysis?
Due Date

The Engineering Analysis is due by the end of the month in which an idle well has been idle for 15 years.

- For wells that as of April 1, 2019, have met the definition of an idle well for 9 years or more, the operator shall provide the Engineering Analysis to the Division by the later of the following:
  - Within 60 days after the date pressure testing on the idle well is scheduled in the operator's Testing Compliance Work Plan; or
  - By the end of the month in which the idle well has been idle for 15 years.
- The Engineering Analysis is a one-time submission due when the well has been idle for 15 years.

What is the 15-Year Engineering Analysis?
Relationship with IWMP, Testing, and Compliance Work Plan

California Department of Conservation

Wells on IWMPs and Testing Waiver Plans

Wells scheduled for P&A on an approved IWMP or Testing Waiver Plan are not required to submit an Engineering Analysis.

Testing

The Engineering Analysis requires that the well be in compliance with the casing pressure test *and* clean out tag requirements under CCR Section 1772.1(a)(2) and (a)(3).

What is the 15-Year Engineering Analysis?
Relationship with IWMP, Testing, and Compliance Work Plan

California Department of Conservation

Compliance Work Plan

- For wells that as of April 1, 2019, have met the definition of an idle well for 9 years or more, the operator shall provide the Engineering Analysis to the Division by the later of the following:
  - Within 60 days after the date pressure testing on the idle well is scheduled in the operator's Testing Compliance Work Plan; or
  - By the end of the month in which the idle well has been idle for 15 years.

Compliance Work Plan Example:

1. As of April 1, 2019 the well has been idle for 22 years. The casing pressure test is scheduled for 2021.
   - The Engineering Analysis *is* due within 60 days of the pressure test.
2. As of April 1, 2019 the well has been idle 10 years. The casing pressure test is scheduled for 2021 and at this time the well will have been idle for 12 years.
   - The Engineering Analysis *is not* due within 60 days of the pressure test.

Review Process

1. Submit the Engineering Analysis form and documents to DOGGRIdleWells@conservation.ca.gov
2. DOGGR reviews the submission for:
    - Completeness – All required information has been submitted
    - Testing requirements – The casing pressure test and clean out tag have been conducted and both passed.
    - Viability – All information is analyzed with respect to the statement of potential future use to verify that the well could be used to access potential oil and gas reserves.

Review Process

3. DOGGR returns the Initial Determination:
    - Viable – Letter notifying the operator of the viable determination.
    - Not Viable – Letter notifying operator of the determination, basis of the determination, additional information required, and due date for submission of additional information.
4. DOGGR returns the Final Determination:
    - Viable – Letter notifying the operator of the viable determination.
    - Not Viable – Notice of Final Determination. The well will need to be plugged and abandoned or scheduled for plug and abandonment under an approved IWMP or Testing Waiver Plan within 12 months.

Review Process

California Department of Conservation

Viable Determinations

Statement of potential future use *is* supported by the provided reservoir characteristic information, representative electric log, structural contour map, and casing diagram.

- Statement of potential future use is detailed.
- The reservoir characteristics aligned with the provided representative electric log.
- The structural map is complete supports the statement of future use and reservoir characteristics.
- The future use of the well can be achieved with the current construction of the wellbore or future re-work of the wellbore.

Not Viable Determinations

Statement of potential future use *is not* supported by the provided reservoir characteristic information, representative electric log, structural contour map, and casing diagram.

- Statement of potential future use is vague.
- The reservoir characteristics do not align with the representative log or the reservoir is not included on the log.
- The structural map is incomplete and does not support the statement of future use or reservoir characteristics.
- The future use of the well cannot be achieved with the current wellbore construction or re-work.

15-Year Engineering Analysis Form

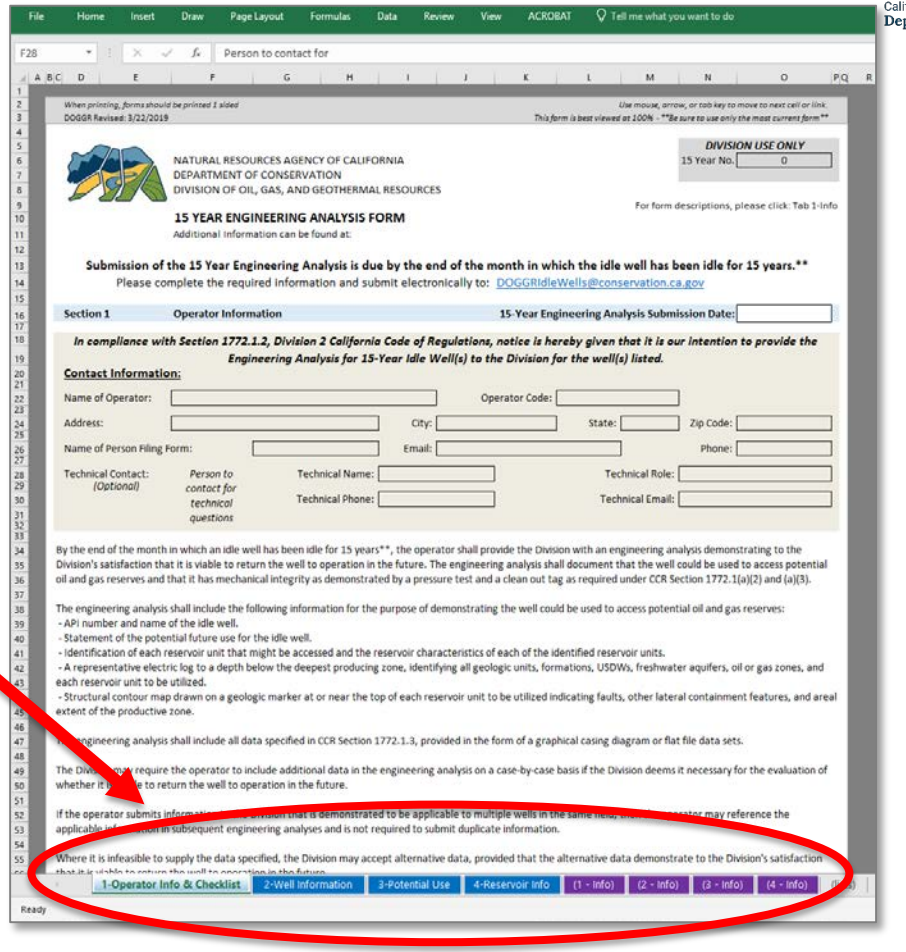
The Engineering Analysis form can be downloaded from the DOGGR Idle Well Program webpage.

Microsoft Excel™ file

Comprised of 4 tabs:

- 1-Operator Information
- 2-Well Information
- 3-Statement of Potential Future Use
- 4-Reservoir Information

Associated information tabs for each section of the form.



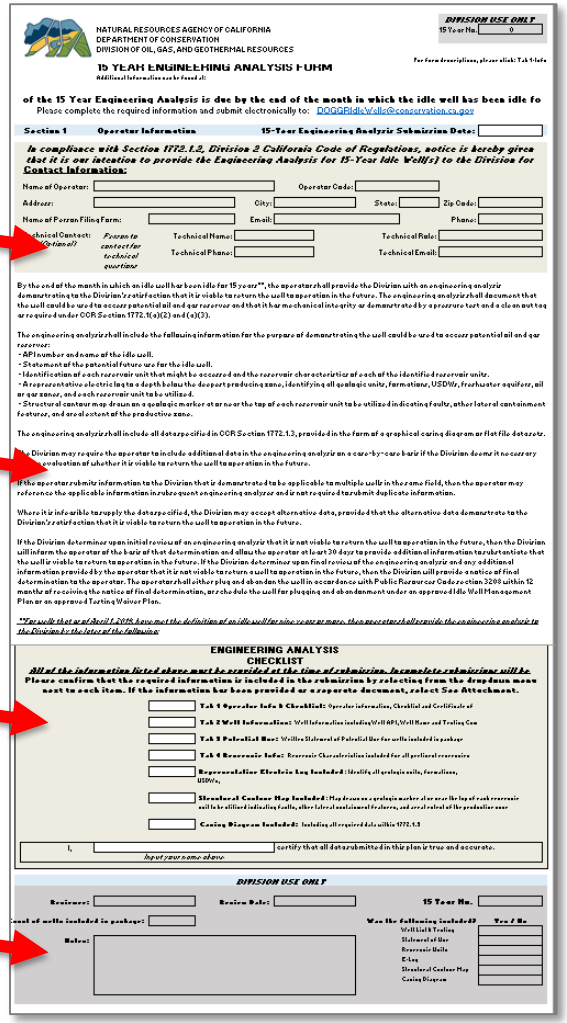
15-Year Engineering Analysis Form
Tab 1-Operator Information

Contact Information Section

15-Year Engineering Analysis requirements

Submission Checklist and Certification of plan accuracy

DOGGR Submission Review Section



NATURAL RESOURCES AGENCY OF CALIFORNIA
DEPARTMENT OF CONSERVATION
DIVISION OF OIL, GAS, AND GEOTHERMAL RESOURCES

DIVISION USE ONLY
15 Year No.

15 YEAR ENGINEERING ANALYSIS FORM

of the 15 Year Engineering Analysis is due by the end of the month in which the idle well has been idle fo
Please complete the required information and submit electronically to: DOGGRIdleWells@conservation.ca.gov

Section 1 Operator Information — 15-Year Engineering Analysis Submission Date:

In compliance with Section 1772.1.2, Division 2 California Code of Regulations, notice is hereby given that it is our intention to provide the Engineering Analysis for 15-Year Idle Well(s) to the Division for

Contact Information:

Name of Operator: Operator Code:
Address: City: State: Zip Code:
Name of Person Filing Form: Email: Phone:
Technical Contact: (if person to contact for technical questions) Technical Name: Technical Role:
Technical Phone: Technical Email:

By the end of the month in which an idle well has been idle for 15 years**, the operator shall provide the Division with an engineering analysis demonstrating to the Division's satisfaction that it is viable to return the well to operation in the future. The engineering analysis shall document that the well could be used to access potential oil and gas reservoirs and that it has mechanical integrity as demonstrated by a pressure test and a clean out trip as required under CCR Section 1772.1(a)(2) and (a)(3).

The engineering analysis shall include the following information for the purpose of demonstrating the well could be used to access potential oil and gas reservoirs:
- API number and name of the idle well.
- Statement of the potential future use for the idle well.
- Identification of each reservoir unit that might be accessed and the reservoir characteristics of each of the identified reservoir units.
- An approximate electric log to a depth below the deepest producing zone, identifying all geologic units, formations, USDWs, freshwater aquifers, oil and gas zones, and each reservoir unit to be utilized.
- Structural contour map drawn on a geologic marker at or near the top of each reservoir unit to be utilized indicating faults, other lateral containment features, and areal extent of the productive zone.

The engineering analysis shall include all data specified in CCR Section 1772.1.3, provided in the form of a graphical casing diagram or flat file dataset.

The Division may require the operator to include additional data in the engineering analysis on a case-by-case basis if the Division deems it necessary for evaluation of whether it is viable to return the well to operation in the future.

If the operator submits information to the Division that it demonstrated to be applicable to multiple wells in the same field, then the operator may reference the applicable information in subsequent engineering analyses and is not required to submit duplicate information.

Where it is infeasible to supply the data specified, the Division may accept alternative data, provided that the alternative data demonstrate to the Division's satisfaction that it is viable to return the well to operation in the future.

If the Division determines upon initial review of an engineering analysis that it is not viable to return the well to operation in the future, then the Division will inform the operator of the basis of that determination and allow the operator at least 30 days to provide additional information to substantiate that the well is viable to return to operation in the future. If the Division determines upon final review of the engineering analysis and any additional information provided by the operator that it is not viable to return a well to operation in the future, then the Division will provide a notice of final determination to the operator. The operator shall either plug and abandon the well in accordance with Public Resources Code section 3206 within 12 months of receiving the notice of final determination, or schedule the well for plugging and abandonment under an approved Idle Well Management Plan or an approved Testing Waiver Plan.

**For wells that as of April 1, 2019, have met the definition of an idle well for nine years or more, then operator shall provide the engineering analysis to the Division by the later of the following:

ENGINEERING ANALYSIS CHECKLIST

All of the information listed above must be provided at the time of submission. Incomplete submissions will be
Please confirm that the required information is included in the submission by selecting from the dropdown menu next to each item. If the information has been provided as a separate document, select See Attachment.

Tab 1 Operator Info & Checklist: Operator information, Checklist and Certificate of
Tab 2 Well Information: Well information including Well API, Well Name and Testing Con
Tab 3 Potential Use: Written Statement of Potential Use for wells included in package
Tab 4 Reservoir Info: Reservoir Characteristics included for all perforated reservoirs
Representative Electric log included: Identify all geologic units, formations, USDWs,
Structural Contour Map included: Map drawn on a geologic marker at or near the top of each reservoir unit to be utilized including faults, other lateral containment features, and areal extent of the productive zone
Casing Diagram included: Including all required data within 1772.1.3

I, certify that all data submitted in this plan is true and accurate.
Input your name above

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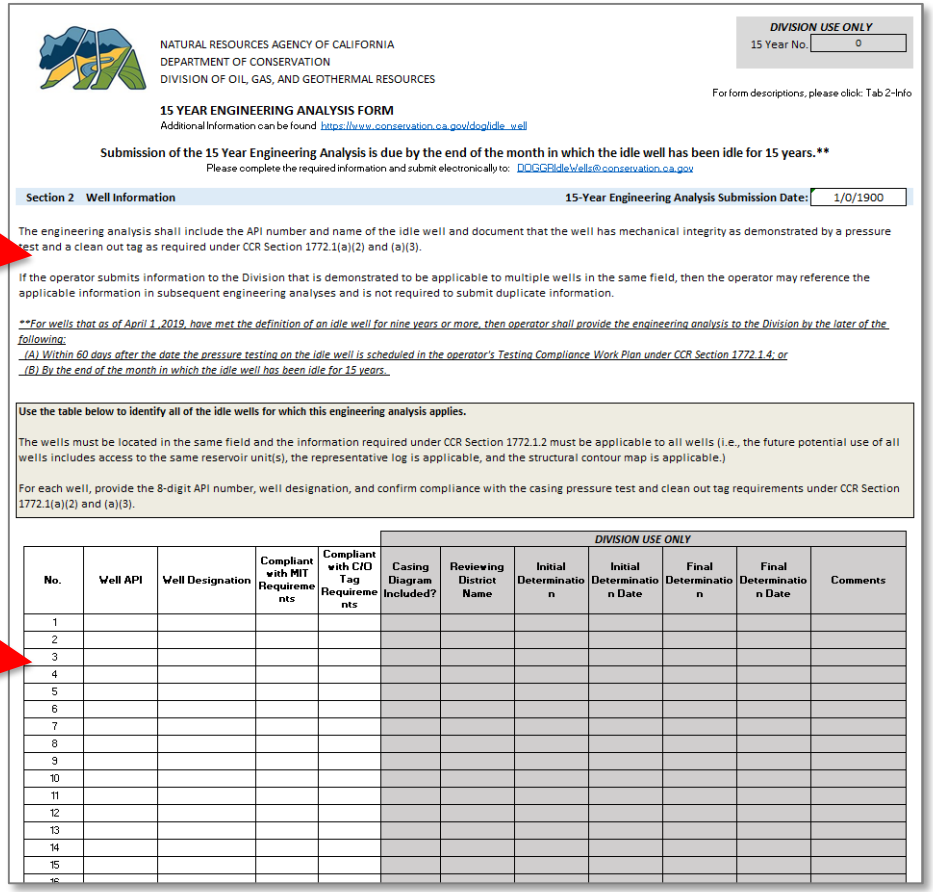
Reviewer: Review Date: 15 Year No.
Count of wells included in package:
Was the following included? Yes / No
Well Unit & Testing
Statement of Use
Reservoir Units
Cities
Structural Contour Map
Casing Diagram
Notes:

15-Year Engineering Analysis Form
Tab 2-Well Information

15-Year Engineering Analysis requirements

List of Wells associated with the submission

- API and Name
- MIT and Clean Out Tag compliance check
- DOGGR review section for each well



NATURAL RESOURCES AGENCY OF CALIFORNIA
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DIVISION USE ONLY
15 Year No. 0

For form descriptions, please click: Tab 2-Info

15 YEAR ENGINEERING ANALYSIS FORM
Additional Information can be found https://www.conservation.ca.gov/dog/idle_well

Submission of the 15 Year Engineering Analysis is due by the end of the month in which the idle well has been idle for 15 years.**
Please complete the required information and submit electronically to: DOGGRIdleWells@conservation.ca.gov

Section 2 Well Information — **15-Year Engineering Analysis Submission Date:** 1/0/1900

The engineering analysis shall include the API number and name of the idle well and document that the well has mechanical integrity as demonstrated by a pressure test and a clean out tag as required under CCR Section 1772.1(a)(2) and (a)(3).

If the operator submits information to the Division that is demonstrated to be applicable to multiple wells in the same field, then the operator may reference the applicable information in subsequent engineering analyses and is not required to submit duplicate information.

***For wells that as of April 1 ,2019, have met the definition of an idle well for nine years or more, then operator shall provide the engineering analysis to the Division by the later of the following:*
(A) Within 60 days after the date the pressure testing on the idle well is scheduled in the operator's Testing Compliance Work Plan under CCR Section 1772.1.4; or
(B) By the end of the month in which the idle well has been idle for 15 years.

Use the table below to identify all of the idle wells for which this engineering analysis applies.

The wells must be located in the same field and the information required under CCR Section 1772.1.2 must be applicable to all wells (i.e., the future potential use of all wells includes access to the same reservoir unit(s), the representative log is applicable, and the structural contour map is applicable.)

For each well, provide the 8-digit API number, well designation, and confirm compliance with the casing pressure test and clean out tag requirements under CCR Section 1772.1(a)(2) and (a)(3).

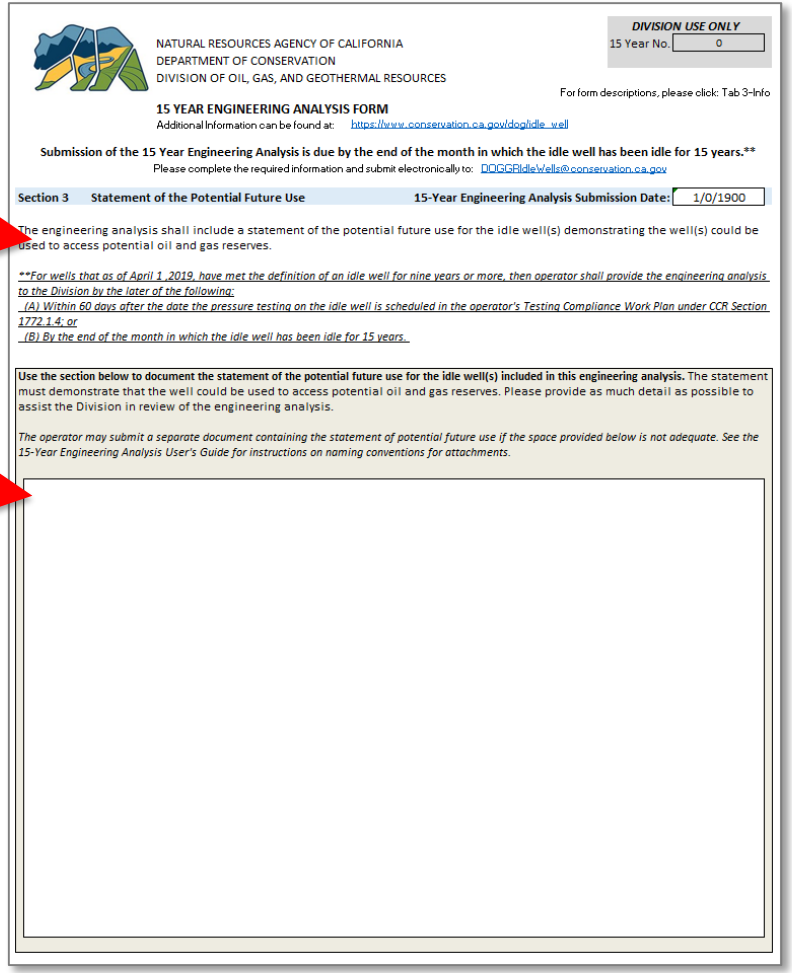
					DIVISION USE ONLY						
No.	Well API	Well Designation	Compliant with MIT Requirements	Compliant with C/O Tag Requirements	Casing Diagram Included?	Reviewing District Name	Initial Determination	Initial Determination Date	Final Determination	Final Determination Date	Comments
1											
2											
3											
4											
5											
6											
7											
8											
9											
10											
11											
12											
13											
14											
15											

15-Year Engineering Analysis Form
Tab 3-Potential Use

15-Year Engineering Analysis requirements

Statement of the potential future use for the well(s) included in this submission.

- Can be submitted as a separate document if more space is needed.



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For form descriptions, please click: Tab 3-Info

15 YEAR ENGINEERING ANALYSIS FORM
Additional Information can be found at: https://www.conservation.ca.gov/dog/idle_well

Submission of the 15 Year Engineering Analysis is due by the end of the month in which the idle well has been idle for 15 years.**
Please complete the required information and submit electronically to: DOGGRIdleWells@conservation.ca.gov

Section 3 Statement of the Potential Future Use **15-Year Engineering Analysis Submission Date:** 1/0/1900

The engineering analysis shall include a statement of the potential future use for the idle well(s) demonstrating the well(s) could be used to access potential oil and gas reserves.

***For wells that as of April 1 ,2019, have met the definition of an idle well for nine years or more, then operator shall provide the engineering analysis to the Division by the later of the following:*
(A) Within 60 days after the date the pressure testing on the idle well is scheduled in the operator's Testing Compliance Work Plan under CCR Section 1772.1.4; or
(B) By the end of the month in which the idle well has been idle for 15 years.

Use the section below to document the statement of the potential future use for the idle well(s) included in this engineering analysis. The statement must demonstrate that the well could be used to access potential oil and gas reserves. Please provide as much detail as possible to assist the Division in review of the engineering analysis.

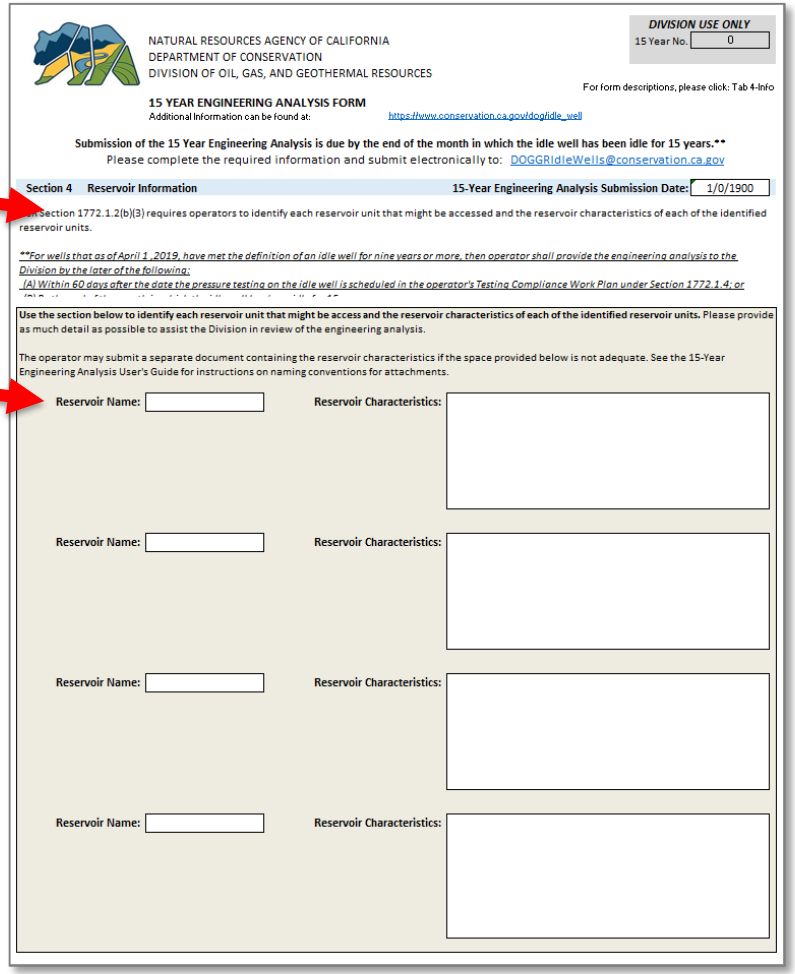
The operator may submit a separate document containing the statement of potential future use if the space provided below is not adequate. See the 15-Year Engineering Analysis User's Guide for instructions on naming conventions for attachments.

15-Year Engineering Analysis Form
Tab 4-Reservoir Info

15-Year Engineering Analysis requirements

Reservoir Information

- Identification of each reservoir unit that might be accessed.
- Description of the reservoir characteristics of each of the identified reservoir units.



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For form descriptions, please click: Tab 4-Info

15 YEAR ENGINEERING ANALYSIS FORM
Additional information can be found at: https://www.conservation.ca.gov/dog/idle_well

Submission of the 15 Year Engineering Analysis is due by the end of the month in which the idle well has been idle for 15 years.**
Please complete the required information and submit electronically to: DOGGRIdleWells@conservation.ca.gov

Section 4 Reservoir Information — 15-Year Engineering Analysis Submission Date: 1/0/1900

Section 1772.1.2(b)(3) requires operators to identify each reservoir unit that might be accessed and the reservoir characteristics of each of the identified reservoir units.

**For wells that as of April 1, 2019, have met the definition of an idle well for nine years or more, then operator shall provide the engineering analysis to the Division by the later of the following:
(A) Within 60 days after the date the pressure testing on the idle well is scheduled in the operator's Testing Compliance Work Plan under Section 1772.1.4; or

Use the section below to identify each reservoir unit that might be access and the reservoir characteristics of each of the identified reservoir units. Please provide as much detail as possible to assist the Division in review of the engineering analysis.

The operator may submit a separate document containing the reservoir characteristics if the space provided below is not adequate. See the 15-Year Engineering Analysis User's Guide for instructions on naming conventions for attachments.

Reservoir Name: | Reservoir Characteristics:

Reservoir Name: | Reservoir Characteristics:

Reservoir Name: | Reservoir Characteristics:

Reservoir Name: | Reservoir Characteristics:

THANK YOU

Questions?

Presenter Name
Presenter Email

Recap and Next Steps

Topics

1. **Timeline & Due Dates**
2. **Operator Resources**
3. **Future Workshops**

Timeline & Due Dates

Regulations become effective April 1, 2019

Due Dates:

May 1, 2019 – Idle Well Fees & Idle Well Management Plans

June 1, 2019 – Testing Compliance Work Plans

- Idle Well Testing is due according to the Compliance Work Plan
- Applies to all wells idle on or before April 1, 2019

January 31, 2021 – Idle Well Inventory & Evaluation

April 1, 2021 – Fluid levels due for all wells idle on or before April 1, 2019

Testing Waiver Plan has no submission due date!

Operator Resources

DOGGR Idle Wells webpage:
https://www.conservation.ca.gov/dog/idle_well/Pages/idle_well.aspx

- **Forms**
- **Inventories**
- **FAQ**

Idle Well Program Inbox: DOGGRIdleWells@conservation.ca.gov

- **General questions**
- **Plan specific questions**
- **Inventory questions**

Future Workshops

- **Idle Well Inventory and Evaluation**
  - Form will be available May 2019
- **Partially Plugged Wells**
- **Idle Wells that are Infeasible to Physically Access (Idle-Buried)**

THANK YOU

Questions?

Presenter Name
Presenter Email

General Q&A Session