

## **Methane Task Force**

### **Q2 Summary of MTF Inquiries Received as of February 20, 2023**

#### Overview

Below is a summary of the questions received during and after the second Methane Task Force public workshop on October 20, 2022.

The Methane Task Force plans to quarterly update the summary of public questions and responses document. We encourage the public, community partners, California Native American tribes, and other interested parties to get involved in our public forums. There are many ways that we encourage participation:

- The Methane Task Force hosts public meetings and workshops: All meetings are open to the public and accessible virtually. There are updates on future meetings advertised through listserv announcements, web updates, and social media.
- We invite you to communicate with us via email: Interested individuals can reach out by email at: [MethaneTaskForce@conservation.ca.gov](mailto:MethaneTaskForce@conservation.ca.gov).
- Website updates and listserv announcements: Information on current and future updates is provided on the Methane Task Force webpage: <https://www.conservation.ca.gov/calgem/Pages/Methane-Task-Force.aspx>. Interested individuals may also sign up to receive regular email updates about the Methane Task Force by requesting to be added to the listserv at [MethaneTaskForce@conservation.ca.gov](mailto:MethaneTaskForce@conservation.ca.gov).

#### Summary of Public Questions and Responses

##### **Q) Where can I find well information and history if I am interested in learning more about a particular well?**

A) There are several ways to gather well history and information.

One option is through the state's three online databases, WellSTAR, WellSTAR Data Dashboard, and Well Finder. To explore each of the data portals, you can visit [CalGEM's Online Data webpage](#).

Another option is to email your request to the CalGEM Public Transparency Office or the WellSTAR team at [CalGEMPublicTransparencyOffice@conservation.ca.gov](mailto:CalGEMPublicTransparencyOffice@conservation.ca.gov) or

[WellSTAR@conservation.ca.gov](mailto:WellSTAR@conservation.ca.gov). Once the request is researched, a staff member will follow up with a response.

**Q) What is the process for detecting leaks and how far away can leaks be detected?**

A) CalGEM employs hand-held Forward Looking InfraRed (FLIR) cameras and Photoionization Detectors (PID) to detect methane and other hydrocarbon gas emissions from oil and gas facility mechanisms. This tool can be used to locate leaks in real-time.

CalGEM is also piloting use of drone technology for inspections, specifically drones equipped with laser methane sensors to measure the amount of methane gas that is in the air above an oil and gas facility. This type of monitoring is periodic and not full-time. If methane is detected in the air by the sensor, the source of the methane is unknown and CalGEM requires further inspection and testing by the operator of the facility. This detection method cannot predict future emission locations and is used as a high-level screening tool.

Regarding how far away can leaks be detected, for our drone sensor, 150 feet is the recommended maximum distance. For the hand-held FLIR camera, approximately 100 feet is a maximum distance, but a typical working distance is 10 to 30 feet.

**Q) Does CalGEM's approval of a Notice of Intention (NOI) to drill an oil well also allow the operator to drill other wells for gas production nearby? Does each well need its own permit for drilling?]**

A) Regardless of well type, in order to drill a well the operator must have a Notice of Intention approved by CalGEM and a bond on file with CalGEM. Each well needs its own NOI approving drilling and an operator may not drill more than one well under a single NOI.

**Q) What is CalGEM's approach to enforcement actions for oil and gas wells and parts of the natural gas distribution system that have been found to be leaking methane at high rates?**

A) CalGEM's regulations require that operators inspect, test, and maintain oilfield equipment, such as tanks and pipelines, so to prevent leaks from

occurring and quickly repair any leaks that do occur. If CalGEM observes or detects methane leaks from equipment or wells, CalGEM will notify the operator through a Notice of Violation or other correspondence. Depending on the level of methane detected, CalGEM will direct the operator in the Notice of Violation or other correspondence to take corrective action and promptly address the leak. A Notice of Violation often will be a sufficient enforcement tool to notify the operator and for the operator to take necessary corrective action to address the leaks. If the operator does not promptly repair the leak, CalGEM may pursue further enforcement action, such as an order to conduct remedial work under Public Resources Code section 3224, or an emergency order under Public Resources Code section 3226. In addition, failure to comply with an order may lead to further enforcement action, such as an administrative order for penalties or criminal action. CalGEM also has authority under Public Resources Code section 3226 to undertake actions deemed necessary to protect life, health, property or natural resources, which includes emergency contract to repair or address the leaks. Finally, CalGEM coordinates closely with CARB, local air districts, and other agencies as appropriate, to address methane leaks.

**Q) Is it true there is no such thing as an orphan well?**

A) Some statements have been made by members of the public that there is no such thing as an orphan well, the assertion being that previous operators, surface property owners or mineral rights owners, can be found and held responsible under statute. The statutory definition of operator may include a company that had owned the well, and also with limitations, mineral interest owners, among others (Public Resources Code, sections 3009 and 3237 subdivision (c)). However, current law does not allow CalGEM to assign liability to surface property owners that did not operate the well and do not own the mineral rights.

In addition, there is a limit in how far back in ownership history CalGEM can go to hold past operators liable. CalGEM can look to previous operators until an operator is found that CalGEM determines has the financial resources to cover the cost of plugging and abandoning the well or decommissioning deserted production facilities. However, the supervisor may not hold an operator responsible that made a valid transfer of ownership of the well before January 1, 1996 (Public Resources Code section 3237 (c)(2)).