



NOTICE TO UNDERGROUND GAS STORAGE OPERATORS

January 7, 2026

Acceptable Well Configuration During Temporary Well Suspensions

The purpose of this Notice is to inform all Underground Gas Storage (UGS) operators of an acceptable well configuration to temporarily suspend wells that penetrate the gas storage reservoir that meets the performance standard in California Code of Regulations, title 14 (CCR), section 1726.5(a).

UGS operators are required to construct and maintain gas storage wells and all other wells that penetrate the gas storage reservoir in a manner which ensures that each well “does not pose an immediate threat of loss of control of fluids and make certain that integrity concerns with a gas storage well are identified and addressed before they can become a threat to life, health, property, the environment, or natural resources.” (Cal. Code Regs., tit. 14, § 1726.5, subd. (a).)

Acceptable Configuration

To meet this performance standard for well isolation or temporary well suspensions, CalGEM will accept the following well configuration:

- A competent and pressure-rated wellhead;
- Kill string with kill fluid; and
- A mechanical plug set as deep as feasible to isolate the storage zone and pressure tested to at least 115% of the maximum allowable operating pressure (MAOP), using either:
 - A retrievable bridge plug (RBP); or
 - A packer and tubing plug.

Purpose of Each Component in the Configuration

The purpose of the kill string is to allow for circulating of the kill fluid. The kill fluid must be of sufficient weight to ensure well control. The RBP or packer and tubing plug must be set in competent, cemented casing within confining strata or other appropriate location.


Meeting Performance Standard in CCR Section 1726.5(a)

For the purpose of permitting and approved well suspensions, wells meeting the criteria above will be deemed to meet the performance standard in CCR section 1726.5(a). Other well configurations may be submitted to CalGEM for consideration on a case-by-case basis as described in CCR section 1726.5(c). Operators are advised to maintain active monitoring in place while the well is temporarily suspended and to notify CalGEM of any changes in well conditions that may indicate a compromised integrity (see section 1726.7).

Wells Not Meeting the Performance Standard

Operators with wells temporarily suspended and which do not meet the performance standard may be required to re-enter the well to come into compliance with CCR section 1726.5 and ensure safe operations of the gas storage project.

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