



NOTICE TO UNDERGROUND GAS STORAGE OPERATORS

December 5, 2025

Casing Diagram Submission Requirements

This Notice to Operators serves as a reminder to underground gas storage (UGS) operators to submit casing diagrams in accordance with 14 CCR section 1726.4. The California Geologic Energy Management (CalGEM) issued a notice to underground gas storage (UGS) operators on February 6, 2025, titled Guidance for Proposed Underground Gas Storage Well Work Operations (2025-02 UGS NTO). This NTO stated that for specific activities, such as casing well thickness inspections, block pressure testing, conversion to tubing and packer, and blowout prevention equipment tests for inspections, UGS operators must follow established notification practices and requirements (including those specified in the [2022-05 Witnessing Notification and Event Requirements](#) and as required by California Code of Regulations, title 14 (14 CCR), section 1726.6, subdivision (d). Additionally, it stated that work that requires submission of a notice of intention (NOI) can be viewed on CalGEM's NOI FAQ page [here](#).

Inconsistencies in Casing Diagram Submission

Since the issuance of the 2025-02 UGS NTO, CalGEM has observed inconsistencies in the submission of updated casing diagrams following well work that does not require an NOI. This current notice serves as a reminder that UGS operators are required to submit updated casing diagrams for all wells specified under 14 CCR section 1726.4, subdivision (a)(5)(F) whenever alterations of wellbore equipment occur, including but not limited to location of packers, sub-surface safety valves, gas lift mandrels, installation of tubing accessories (sliding sleeve, landing nipples), changes in setting depths, changes in tubing size, weight, grade, and connection types, modifications to wellhead components (e.g., tubing hangers, master valves, tree valves, and other wellhead assembly equipment), and any feature that influences flow in the well or may compromise the mechanical integrity of the well (14 CCR § 1726.4.1).

Requirement to Submit Updated Casing Diagram

The requirement for updated casing diagrams is in accordance with 14 CCR section 1726.4, subdivision (a), which provides:

- For all underground gas storage projects, the operator shall provide the Division with data, analysis, and interpretation that demonstrate that stored gas will be confined

to the approved zone(s) of injection and that the underground gas storage project will not cause damage to life, health, property, the environment, or natural resources. The operator shall provide the data specified in this section and any data that, in the judgment of the Division, on a case-by-case basis, are pertinent and necessary for the proper evaluation of the project. **The operator shall ensure that required data is complete, current, and accurate, regardless of the date of approval of the gas storage project.** The data submitted to the Division shall include at least the following:

- (5) An engineering and geological study demonstrating that injected gas will not migrate out of the approved zone or zones, such as through another well, geologic structure, faults, fractures or fissures, or holes in casing. The study shall include, but is not limited to:
- (F) **All data specified in Section 1726.4.1, provided in the form of graphical casing diagrams** or flat file data sets, for all wells that are within the area of review and that are in the same or a deeper zone as the gas storage reservoir, including directionally drilled wells that intersect the area of review in the same or deeper zone.

Effective Immediately:

- Please ensure all casing diagrams are updated and reflect the current condition of each well.
- Submit the updated casing diagram within 60 days after well work is completed.