



## NOTICE TO UNDERGROUND GAS STORAGE OPERATORS

December 5, 2025

### Submitting Well Chemical Inventory Protocols

The California Geologic Energy Management (CalGEM) Division is issuing this notice to remind Underground Gas Storage (UGS) operators of the requirement to submit a protocol for maintaining and providing Gas Storage Well Chemical Inventories (WCI) to CalGEM for review by January 1, 2026, as directed in California Code of Regulations, title 14, Section 1726.4.3. A list of key deadlines and some new compliance requirements were highlighted for your attention in the UGS Notice to Operators (NTO) dated June 26, 2025, which can be found on [CalGEM's UGS NTO webpage](#).

New WCI regulations became effective on July 1, 2025. A copy of the WCI regulations can be accessed on [CalGEM's laws and regulations webpage](#). Although below is not a complete list of new requirements, CalGEM would like to draw your attention to some key components that each WCI protocol must contain. Attention to the guidance below will ensure a timely review and feedback of the protocols ahead of the July 1, 2026, deadline.

### Key Components for Well Chemical Inventory Protocol

New WCI regulations introduced a requirement for submitting a protocol for maintaining and providing well chemical inventories. The information listed below provides additional context and best practices for protocol requirements:

#### Three Parts of the Well Chemical Inventory Protocol

1. **Maintenance of Well Chemical Inventories:** The protocol shall identify how the inventory will capture, on a well-by-well basis, all chemical constituents found in materials of any phase that may be emitted from the well, including wellbore-produced and formations fluids.
2. **Workplan for Completing Baseline Testing:** Although the baseline analytical testing results of the reservoir are not due until July 1, 2026, the workplan for completing the baseline analytical testing and analysis shall be included in the WCI protocol. Baseline testing requirements can be found in Section 1726.4.3 subdivision (c).

3. **Emergency Response Plan:** Submission of an updated Emergency Response Plan (ERP) incorporating procedures to ensure and confirm that gas storage well chemical inventories on file are current and complete in the event of a reportable leak. As a reminder, UGS operators shall review and update their ERP every year not to exceed 15 months. When reviewing and updating the ERP, operators shall again provide local emergency response entities at least 30 days to review and provide input on the emergency response plan as required by Section 1726.3.1 subsection (a).

## Baseline Sampling

When developing your workplan for completing baseline testing consider the following:

1. **Determining Sample Adequacy:** A single sample could be sufficient as a representative of the whole reservoir, however, if the reservoir has sections that are not in communication with each other, due to faults or other mechanisms, additional samples will be necessary to represent individual compartments of the reservoir. The workplan for baseline sampling should include a brief description of the storage reservoir and a rationale for selecting the wells to be used for baseline sample collection.
2. **Non-Detected Constituent Reporting:** In the instance where any required baseline constituent is not detected the resulting lab report must still be submitted and the lab report must include the laboratories minimum detection limit for that chemical constituent. This will ensure complete records are created and that any required constituent is not assumed to be missing or omitted.

## Tracking Intentionally Placed Materials

The protocol should include a template for tracking materials that are intentionally placed in the well. The process for tracking shall include volume and date of materials placed in a well, along with the cumulative volume. Tracking removal of material placed in a well is not required but may be included on the tracker as part of the well's inventory process.

## WCI and Well Summaries

The protocol shall also call for submittal of updated WCIs to CalGEM with well summaries for permitted well work in accordance with Section 1724.1, as well as submission of updated WCI inventories annually by July 1 of each year. The annual submission may be a resubmission of a previous inventory if nothing has been added to

the well since the previous submission, or may contain updates from materials added between permitted activities.

## **Submitting Well Chemical Inventory Protocols in WellSTAR**

Submit the WCI protocol using the WellSTAR Document Upload form and associate the protocol to the relevant UGS Project ID. Additional guidance on the use of this WellSTAR form is attached to this notice.

If you have questions or believe you will be unable to provide a WCI protocol by January 1, 2026, contact Jeanette Hand at [Jeanette.Hand@conservation.ca.gov](mailto:Jeanette.Hand@conservation.ca.gov) as soon as possible.



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