



# DEPARTMENT OF CONSERVATION

*Managing California's Working Lands*

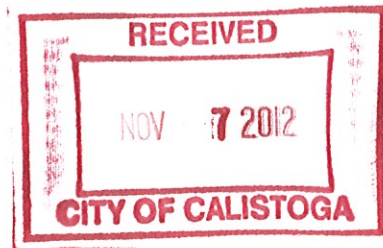
## DIVISION OF OIL, GAS, & GEOTHERMAL RESOURCES

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November 1, 2012

Mr. Erik V. Lundquist  
Planning and Building Department  
City of Calistoga  
1232 Washington Street  
Calistoga, CA 94515



Dear Mr. Lundquist:

The California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (Division) has received the Initial Study for the Indian Springs Expansion Project (SCH# 201202035). The Division regulates the drilling, operation, and plugging & abandonment of geothermal wells in California. We have the following comments for your consideration:

The proposed project is within the administrative boundaries of the Calistoga Geothermal Field. The project proposes to produce geothermal waters, extract heat through a heat exchanger, and inject these "non-body-contact" waters into an EPA Class V injection well. The Division will be a Responsible Agency under CEQA for this project, as the Division will issue discretionary permits for each proposed injection well, and the injection project as a whole to ensure that fresh and useable groundwater are protected. Page 38 of the document states: *"DOGGR has indicated that this proposed project has been approved with conditions."* This is not true. While this type of project has been approved to operate elsewhere in the Calistoga Geothermal Field, the applicant will need to make a separate application to the Division for injection project approval in accordance with Title 14, Division 2, Chapter 4, Subchapter 4, Article 6 of the California Code of Regulations.

The proposed project is the site of historic geothermal water production from wells. Some old wells may not have been constructed or plugged & abandoned to current standards. In the event that grading activities discover any well, this Division needs to be contacted prior to working on that well. Remedial action may be required. Any work to plug & abandon or reabandon a well must be performed under the authority of a permit from this agency.

If you have any questions, please call this office.

Sincerely,

A handwritten signature in blue ink that reads "Joseph A. Austin".

Joseph A. Austin  
District Geothermal Engineer