

State of California
Natural Resources Agency / Department of Conservation
GEOLOGIC ENERGY MANAGEMENT DIVISION

California Environmental Quality Act
Notice of Exemption

To: Office of Planning & Research
State Clearinghouse
1400 Tenth Street, Room 113
Sacramento, CA 95814

From: Department of Conservation
715 P Street, MS 1803
Sacramento, CA 95814
Contact: CEQA@conservation.ca.gov

Project Title: OG SLC 03142024

Project Applicant: California State Lands Commission

Project Location: South Elwood Oil Field on Platform Holly
Latitude 34.39062881, Longitude 119.90657806

Project Description: California State Lands Commission (SLC) submitted nine Notice of Intention (NOI) to plug and abandon wells on offshore Platform Holly in the South Elwood Oil Field located approximately two miles of the coast from Santa Barbara.

Former State Oil and Gas Leases Nos. PRC 421, PRC 3120, and PRC 3242 consist of offshore oil and gas operations that include an oil and gas platform (Platform Holly), onshore oil and gas piers (Ellwood Piers), and 32 oil and gas wells and their associated infrastructure. The California State Lands Commission (SLC) is the Lead Agency under the California Environmental Quality Act (CEQA) for a project that includes plug and abandonment of 30 oil and gas wells on Platform Holly and 2 wells situated on Ellwood Piers to support the plug and abandonment work. The SLC has filed a Notice of Exemption with the State Clearinghouse (SCH# 2018108286) for the project.

The purpose of the proposed Project is a change (supplemental permits) to nine of the original permits issued to plug and abandon wells on Platform Holly. The supplemental permits are needed to address additional well plug and abandonment work, including milling the casing and upgrading the surface plug to within 15 feet of surface. The offshore wells will be properly abandoned by the SLC, following California Geological Energy Management Division regulations, to reduce the potential for future spills and, or releases to the environment. The work performed under the proposed Project will require minimal temporary equipment, as most of the needed equipment is already in place to service existing wells. Equipment would consist primarily of cement pumping equipment. No new permanent facilities will be or need to be constructed. There would not be any new seafloor disturbance or impact to species or their habitat, associated with the project. All waste materials generated will be properly disposed of in accordance with applicable laws and regulations. The project activity would take approximately 90 days to complete.

The proposed project consists of CalGEM approving nine permits for the SLC to plug and abandon the oil well listed below, in the South Elwood Oil Field on Platform Holly.

API#	Well Name	API#	Well Name
0428320060	AMES 3120 7	0428320268	AMES 3120 11
0428320002	AMES 3242 4	0428320275	AMES 3242 17
0428320039	AMES 3242 5	0428320273	AMES 3242 15
0428320071	AMES 3120 8	0428320262	AMES 3242 9
0428320265	AMES 3242 10		

Exempt Status: As the Lead Agency, CalGEM has determined that the proposed project is exempt from full environmental review requirements of the California Environmental Quality Act (CEQA), pursuant to the specified exemptions marked in the section below. CalGEM further finds that the proposed project would not result in a significant adverse impact to the environment and that none of the exceptions to the application of the exemptions apply (14 CCR § 15300.2).

Exemption Type		Statute (PRC)	Regulation (14 CCR)	
<input type="checkbox"/>	Statutory Exemption:			
<input type="checkbox"/>	Ongoing Project (<i>pre-CEQA approval on April 5, 1973</i>)	21169	15261 (b)	
<input type="checkbox"/>	Ministerial	21080 (b)(1)	15268	
<input type="checkbox"/>	Declared Emergency	21080 (b)(3)	15269 (a)	
<input type="checkbox"/>	Emergency Projects	21080 (b)(4)	15269 (b) or (c)	
<input type="checkbox"/>	Categorical Exemption:	21084		
<input checked="" type="checkbox"/>	Class 1: Existing Facilities		15301	1684.1
<input type="checkbox"/>	Class 3: New Construction/Conversion of Small Structures		15303	
<input checked="" type="checkbox"/>	Class 4: Minor Alterations to Land		15304	1684.2
<input checked="" type="checkbox"/>	Class 7: Protection of Natural Resources		15307	
<input checked="" type="checkbox"/>	Class 8: Protection of the Environment		15308	
<input type="checkbox"/>	Class 11: Accessory Structures		15311	
<input type="checkbox"/>	Class 21: Enforcement Actions to revoke a permit		15321	
<input type="checkbox"/>	Class 30: Minor Actions to Prevent, Minimize, Stabilize, Mitigate, or Eliminate a Release (Actual or Threat) of Hazardous Substances (Waste or Material)		15330	
<input type="checkbox"/>	Class 33: Small Habitat Restoration Projects		15333	
<input type="checkbox"/>	General Exemption ("common sense")		15061 (b)(3)	
<input type="checkbox"/>	Not a "Project" subject to CEQA		15378 (b)(2)	
CEQA Exceptions to the Exemptions (14 CCR § 15300.2): where project is located (e.g., sensitive environment); Cumulative Impact; Significant Effect due to Unusual Circumstances; Scenic Highways; Hazardous Waste Sites; Historical Resources.				

Reasons Why Project is Exempt: The basis for CalGEM’s determination that the project is exempt from the requirements of CEQA is provided in the brief explanation below.

Class 1, Existing Facilities (14 CCR §§ 15301, 1684.1): Class 1 exemption applies as CalGEM’s regulations state: “Class 1 consists of the operation, repair, maintenance, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features involving negligible or no expansion of use beyond that existing previously. The Class includes, but is not limited to: remedial, maintenance, conversion, and abandonment work on oil, gas, injection, and geothermal wells...”. The proposed Project is to plug and abandon nine wells on offshore Platform Holly. The work performed under the proposed Project will require minimal temporary equipment, as most of the needed equipment is already in place to service existing wells. Equipment would consist primarily of cement pumping equipment. No new permanent facilities will be or need to be constructed.

Class 4, Minor Alterations to Land (14 CCR §§ 15304, 1684.2): Class 4 exemption applies. The proposed Project would be conducted entirely on the existing offshore Platform Holly with enough space to contain all equipment. The proposed Project would not result in any new seafloor disturbance or impact to species or their habitat. Therefore, the project “consists of drilling operations that result in only minor alterations with negligible or no permanent effects to the existing condition of the land, water, air, and/or vegetation.”

Classes 7 and 8, Protection of Natural Resources and the Environment (14 CCR §§ 15307, 15308): Class 7 and Class 8 exemptions apply. The exemptions are for actions taken by regulatory agencies as authorized by law to assure the maintenance, restoration, enhancement, or protection of a natural resource or the environment where the regulatory process involves procedures for the protection of the environment.” As demonstrated in the record, the plug and abandonment of the nine wells would not relax standards allowing environmental degradation, but rather would assure the maintenance, restoration, or enhancement of a natural resource where the regulatory process involves procedures for protection of the environment.

Exceptions to Exemptions: CalGEM further finds that there are no exceptions to the application of the categorical exemptions (PRC § 21084; 14 CCR § 15300.2(c)) referenced above. There is no substantial evidence that there are any “unusual circumstances” associated with the proposed project that create a reasonable possibility that the activity will have a significant effect on the environment, and that there are no significant “cumulative impacts” resulting from successive projects of the same type in the same place. Therefore, reliance on the exemptions is appropriate.

Consistent with the purposes of PRC § 3250 et seq and the documentation available for the preliminary review, the proposed project will benefit the environment. In addition, the work under the contracts and any resulting impacts will be temporary in duration. Therefore, the project can be considered exempt from the need for full CEQA review.

A copy of this NOE (as required by 14 CCR § 15062(a)) and all other related materials are available for public inspection at CalGEM’s CEQA Program, located at 715 P Street, 18th floor, Sacramento, CA 95814; or an electronic copy of these documents may also be accessed online at the State Clearinghouse: <https://ceqanet.opr.ca.gov>.

Certified: Jan Perez **Date:** _____
 Department of Conservation,
 Geologic Energy Management Division
 CEQA Program