

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: 530203_Group_Aera_UIC

Project Applicant: Aera Energy LLC

Project Location: Kern County, Lost Hills & South Belridge oil fields; 18/26S/21E;
Latitude 35.66852188, Longitude -119.75634003

Project Description: The approved project consists of reworking 13 steamflood injection wells by performing cement squeeze 5 wells, performing cement squeeze and adding perforations to 5 wells, and perforating 3 wells. The proposed site for each rework operation will encompass an area of 100 feet by 200 feet (20,000 square feet, or 0.47 acres). Each individual rework will take a total of 3.5 days once work has begun. Equipment that may be utilized during rework operations includes, but is not limited to workover rig, wireline truck, coil tubing unit, cement equipment, pumps, tanks, backhoes, pickup trucks, and delivery trucks. The work will occur on existing well pads and will use existing facilities. No new infrastructure will occur as a result of the work. No new grading in undisturbed areas will occur in any phase of the work.

The administrative grouping initially proposed reworking 20 wells. Of the 20 wells, 7 wells were determined to have integrity issues that required swift action for the protection of public health, safety, and the environment and therefore received expedited review. The work was approved with a prior exemption and the optional NOE was not filed. The scope of this review is the rework of the remaining 13 wells from the initial administrative grouping. The wells that received expedited review are listed below.

API #	Well Name
0403026053	Lost Hills Three 5129-13
0403051820	Lost Hills C 5183R1-13
0403054189	Unspecified 686S-12
0403051822	Lost Hills C 5208R-13
0403059788	Anderson-Fitzgerald 4607U-26S
0403065258	SEBU T 5179-12
0403067658	Lost Hills C LC5161-13

CalGEM has approved permits for Aera Energy LLC to rework the steamflood injection wells listed below, in the Lost Hills and South Belridge oil fields.

API #	Well Name
0403038656	Lost Hills Govt. 5219-18
0403060867	Lost Hills Three LH3034R-13
0402988917	Lost Hills Three TO35-13
0403054750	MD3241-13
0403062719	MD306R-13
0403043066	Marina 5010A-10
0403038619	Lost Hills Govt. 5322-18
0403029968	Lost Hills C 5202R-13
0403060863	Lost Hills Three LH5076R-13
0403062628	637GL-20
0403062649	Lost Hills Govt. G4-11 BR1-18
0403029970	Lost Hills Three 5128R-13
0403051821	Lost Hills C 3247R-13

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, or that any 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>) <input type="checkbox"/> Ministerial <input type="checkbox"/> Declared Emergency <input type="checkbox"/> Emergency Projects	21169 21080 (b)(1) 21080 (b)(3) 21080 (b)(4)	15261 (b) 15268 15269 (a) 15269 (b) or (c)	
Exemption Type	Statute (PRC)	Regulation (14 CCR)	
<input checked="" type="checkbox"/> Categorical Exemption: <input checked="" type="checkbox"/> Class 1: Existing Facilities <input checked="" type="checkbox"/> Class 2: Replacement or Reconstruction <input type="checkbox"/> Class 3: New Construction/Conversion of Small Structures <input checked="" type="checkbox"/> Class 4: Minor Alterations to Land <input type="checkbox"/> Class 7: Protection of Natural Resources <input type="checkbox"/> Class 8: Protection of the Environment <input type="checkbox"/> Class 11: Accessory Structures	21084	15301 15303 15304 15307 15308 15311	1684.1 1684.2

<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:

Class 1, Existing Facilities (14 CCR §§ 15301, 1684.1): The project is exempt under the Class 1, Existing Facilities exemption because the project would make minor changes to existing wells involving no expansion of the existing use of the wells. Class 1 consists of the "minor alteration" of existing facilities "involving negligible or no expansion of existing or former use." (14 CCR § 15301.) This includes "alteration of well casing, such as perforating and casing repair." (14 CCR § 1684.1.) The project would make negligible changes to 13 existing steamflood injection wells that would not change the existing use of the wells. The project would cement squeeze 5 wells, cement squeeze and add perforations to 5 wells, and perforate 3 wells. These are minor changes meant to maintain the wells in order to continue resource development. The wells would remain steamflood injection wells with substantially the same capacity. Additionally, a CalGEM engineer has confirmed that the proposed work is within the scope of UIC projects 43200022 and 05200010 and would be a continuation of operations within the confines of the UIC projects as permitted by the PALs. Therefore, the changes to the existing facilities would be negligible and would not expand the existing use of the facilities.

Class 2, Replacement or Reconstruction (14 CCR § 15302): The project is exempt under the Class 2, Replacement or Reconstruction exemption because the project would reconstruct the casing of existing wells and would not change the purpose or capacity of the wells. Class 2 consists of "replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced[.]" (14 CCR § 15302.) The project would reconstruct the casing of 13 existing steamflood injection wells by performing cement squeeze 5 wells, performing cement squeeze and adding perforations to 5 wells, and perforating 3 wells. The work would take place on existing wells which are located on existing well pads in two densely developed oilfields. This reconstruction of the casing is meant to maintain the wells in order to continue resource development. The wells would remain steamflood injection wells with substantially the same purpose and capacity. Additionally, a CalGEM engineer has confirmed that the proposed work is within the scope of UIC projects 43200022 and 05200010 and would be a continuation of operations within the confines

of the UIC projects as permitted by the PALs. The reconstructed well casing would remain in the same site and would not change the purpose or capacity of the wells.

Class 4, Minor Alterations to Land (14 CCR §§ 15304, 1684.2): The project is exempt under the Class 4, Minor Alterations to Land exemption because the project would have negligible effects on the surrounding environment. Class 4 consists of "drilling operations that result only in minor alterations with negligible or no permanent effects to the existing condition of the land, water, air, and/or vegetation" (14 CCR § 1684.2; see also 14 CCR § 15304.) The project would rework 13 existing steamflood injection wells, which are located on existing well pads within two densely developed oilfields. The project would not involve grading in undisturbed areas or the construction of new facilities. The project would use existing facilities, including existing electrical lines, infrastructure, and roads. Therefore, the project would not result in new ground disturbance that would significantly impact the surrounding land, water, air, or vegetation.

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 exemption(s) 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 can be made available to the public by contacting the CalGEM CEQA Program, located at 715 P Street, MS 1803, Sacramento, CA 95814-3530; by calling (916) 445-9686; or an electronic copy of these documents may be requested by contacting CEQA@conservation.ca.gov. A copy of this NOE may also be accessed online at the State Clearinghouse: <https://ceqanet.opr.ca.gov>

Certified: Mikayla Vaba **Date:** 10/24/2024
Department of Conservation, Geologic Energy
Management Division
CEQA Program