

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: 579664_Thompson_OG

Project Applicant: Thompson Oil Company Inc

Project Location: Ventura County, Ojai Oil Field
Latitude 34.43461609, Longitude -119.1331177

Project Description: CalGEM detected a methane leak at the Ojai 39 well on January 23, 2024. Following detection of the leak, CalGEM issued a Notice of Violation (NOV) to the operator of the well on February 1, 2024. The permitted activity consists of performing a cement squeeze to repair the well and address the leak. The proposed rework program involves setting a packer below the surface casing shoe and performing a cement squeeze job to properly isolate the formation behind the surface casing to stop gas migration and leaking to the surface.

The well is located on an existing dirt pad. Any disturbed surface area will be cleaned and graded to a like condition prior to this project. There are no Tanks on pad. Any other surface equipment on the pad will not be disturbed. There is no surface piping connected to this well. Project duration is approximately 4 days. Temporary equipment such as pumps and return bins will be needed. No permanent facilities will be constructed. No expansion of associated facilities will be required. Waste materials will be manifested and transported by a properly placarded vehicle to a State of California licensed disposal facility as non-hazardous or hazardous waste, as appropriate. No water will be used for this abandonment project.

The leak is described in the project file as methane at about 10,000 ppm. The Ojai 39 well is designated as a critical well, with the closest sensitive receptor approximately 300 feet from the wellhead.

The permitted activity consists of CalGEM approving one permit to rework the oil and gas well listed below.

API #	Well Name
0411100952	Ojai 39

Exempt Status: As the Lead Agency, CalGEM has determined that the permitted activity 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 permitted activity 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 checked="" 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 checked="" type="checkbox"/> Emergency Projects	21080 (b)(4)	15269 (b) or (c)	
<input checked="" type="checkbox"/>	Categorical Exemption:	21084		
	<input checked="" type="checkbox"/> Class 1: Existing Facilities		15301	1684.1
	<input checked="" type="checkbox"/> Class 2: Replacement or Reconstruction			
	<input type="checkbox"/> Class 3: New Construction/Conversion of Small Structures		15303	
	<input 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)	
<p>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.</p>				

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.

Statutory Exemption – Emergency Projects: As the CEQA lead agency for the permitted activity, CalGEM has determined that the permitted activity is exempt from further environmental review requirements of CEQA, pursuant to the statutory exemption: Emergency Project (PRC § 21080(b)(4); 14 CCR § 15269(c).) because the well is designated as a critical well, leaking methane at about 10,000 ppm, and within 300 feet of a sensitive receptor. Therefore, immediate action is necessary to prevent or respond to a threat to public health, safety, or the environment.

Class 1, Existing Facilities (14 CCR §§ 15301, 1684.1): Class 1 applies to the permitted activity. Class 1 consists of the “operation, repair, maintenance, or minor alteration” of existing facilities involving “negligible or no expansion of use beyond that existing previously.” (§ 1684.1.) The project involves the maintenance and repair of a production well and does not include modifications or changes to an existing use. The permitted activity involves performing a cement squeeze on the well to seal the casing and stop the leak. The operator indicates that no permanent facilities would be constructed, and the project would not involve any new ground surface disturbance, including no new roads or other corridors. Therefore, there is no expansion of use beyond that previously existing.

Class 2, Replacement or Reconstruction (14 CCR § 15302): Class 2 applies to the permitted activity. Class 2 includes the “replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity.” This is a rework that involves performing a cement squeeze on the well to seal the casing and stop the leak and does not propose changes to the structure of the well (the wellbore). The location of the well would not change, nor would the underground structure of the well (the wellbore), nor would the purpose of the well, which is production.

Class 7 & 8 Protection of Natural Resources and the Environment (14 CCR §§ 15307, 15308): Class 7 and 8 also apply to the permitted activity. Class 7 and Class 8 include 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, including the NOV, this well presents a safety concern that may increase the risk for adverse impacts to the environment or natural resources in the area due to the leaking well. CalGEM has statutory and regulatory authority to protect natural resources and the environment. Addressing the NOV and reworking this well will ensure that potential impacts to natural resources and the environment from compliance issues associated with the well are minimized, and the approval for the rework will also include conditions that protect natural resources and the environment. Therefore, as demonstrated in the permitted activity file description of the well rework operations, which include a cement squeeze job, the rework would assure the maintenance, restoration, enhancement, and/or protection of a natural resource and 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 permitted activity that create a reasonable

possibility that the activity will have a significant effect on the environment. The approved project is within a Health Protection Zone (HPZ) as defined by PRC section 3280(b). The HPZ does not present an unusual circumstance because SB 1137 (PRC § 3280 et seq.) requires all oil or gas production facilities or wells with a wellhead within an HPZ to comply with specified health, safety, and environmental requirements. In addition, CalGEM further finds 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.

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

Department of Conservation,
Geologic Energy Management Division
CEQA Program

Date: 11/15/2024