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: State Abandonment of Orphan Wells Project - Las Cienegas

Project Applicant: Department of Conservation, Geologic Energy Management Division

Project Location: Las Cienegas Oil Field, Urban Drill Site, 814 W 23rd Street, Los Angeles, CA 90007

Project Description: The proposed project consists of the plug and abandonment (P&A) of 21 existing orphan wells in Los Angeles County as part of CalGEM's State Abandonment Program. The proposed work involves well abandonment and decommissioning tanks and other production-related facilities attendant to the wells. The wells are contained within a 12-foot wide, by 120-foot long, by 8-foot deep well bay. For well abandonment, each well will be cleaned out and then plugged with cement and inert mud to surface. After abandonment, the well head will be removed, and any remaining well casings and surface conductors will be cut to just above the bay floor. Once the well bay is clean, it will have suitable fill placed and compacted. The well bay will be encapsulated with impermeable concrete to seal the bay area. These wells are situated within an established oil field in an urban setting on private lands surrounded by an 8-foot masonry wall.

CalGEM has approved a task order for its contractor to perform the proposed work on the wells listed at the end of this NOE. Notices of Intention will be issued to the contractor for administrative purposes only and do not constitute a discretionary approval.

API#	Lat	Lon
403720383	34.03175	-118.278
403720356	34.03176	-118.278
403706333	34.03177	-118.278
403720439	34.03178	-118.278
403720475	34.03178	-118.278
403720275	34.03179	-118.278
403720476	34.0318	-118.278
403720564	34.03182	-118.278

API#	Lat	Lon
403720502	34.03181	-118.278
403720455	34.03182	-118.278
403705177	34.03183	-118.278
403720511	34.03184	-118.278
403720372	34.03184	-118.278
403720609	34.03185	-118.278
403720194	34.03185	-118.278
403720203	34.03187	-118.278
403720628	34.03185	-118.278
403720191	34.03188	-118.278
403720308	34.03188	-118.278
403720165	34.03189	-118.278
403720125	34.03189	-118.278

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)		
	Statut	ory Exemption:			
		Ongoing Project (pre-CEQA approval on April 5, 1973)	21169	15261 (b)	
		Ministerial	21080 (b)(1)	15268	
		Declared Emergency	21080 (b)(3)	15269 (a)	
		Emergency Projects	21080 (b)(4)	15269 (b) or (c)	
$\overline{\mathbf{Q}}$	✓ Categorical Exemption:		21084		
	$\overline{\checkmark}$	Class 1: Existing Facilities		15301	1684.1
		Class 2: Replacement or Reconstruction		15302	
		Class 3: New Construction/Conversion of Small Structures		15303	
	\checkmark	Class 4: Minor Alterations to Land		15304	1684.2
	\checkmark	Class 7: Protection of Natural Resources		15307	
	\checkmark	Class 8: Protection of the Environment		15308	
		Class 11: Accessory Structures		15311	
		Class 21 : Enforcement Actions to revoke a permit		15321	
		Class 30: Minor Actions to Prevent, Minimize, Stabilize, Mitigate, or Eliminate a Release (Actual or Threat) of Hazardous Substances (Waste or Material)		15330	

Exemption Type		Statute (PRC)	Regulation (14 CCR)	
	Class 33: Small Habitat Restoration Projects		15333	
	General Exemption ("common sense")		15061 (b)(3)	
	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...". These abandonments could be considered a minor alteration to the existing facilities because the existing wells will be permanently sealed. After abandonment, the well will cease to be used for oil and gas activities. Therefore, there is no expansion of use beyond that previously existing.

Class 4, Minor Alterations to Land (14 CCR §§ 15304, 1684.2): Class 4 exemption applies as the project would be conducted entirely on existing pads of sufficient space enough to contain all equipment, and existing roads to the pad would be utilized with no new disturbance. No impacts to biological resources are expected because abandonment activities would not disturb any undisturbed area, and the pads are located within industrial, urban areas. 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." The abandonments would not expand the facility and are conducted in order to protect the surrounding natural resources and environment.

Class 7 and Class 8, Actions by Regulatory Agencies for Protection of Natural Resources and the Environment (14 CCR §§ 15307, 15308): Orphan wells, due to their inherent lack of maintenance and open pipe to potential reservoir pressure and fluids, present an increased risk for potential leaks that could affect and impact natural resources and environment in the area. In addition, because the wells are within 3,200 feet of residences, the increased risk of leaks of hazardous substances could negatively impact surrounding sensitive receptors. Orphan wells present an increased risk of leaks when compared to a properly abandoned well and therefore must be plugged and abandoned to minimize a potential threat of a release and subsequent impact. Abandonment of these orphan wells would ensure that risks from leaks and potential impacts to the natural resources and environment are minimized to the extent feasible and therefore the Class 7 and Class 8 exemptions are potentially applicable.

Exceptions to Exemptions: CalGEM further finds that there are no exceptions to the application of the categorical exemptions (PRC § 21084; 14 CCR § 15300.2) referenced above. For example, 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.

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; by calling (916) 445-9686; or an electronic copy of these documents may be requested by contacting CEQA@conservation.ca.gov. The notice filed with the State Clearinghouse may be accessed online at: https://ceqanet.opr.ca.gov

Certified: grag chittick Date: 12/11/2024

Department of Conservation,
Geologic Energy Management Division