

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
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Sacramento, CA 95814
Contact: CEQA@conservation.ca.gov

Project Title: 627752_Group_Crimson_OG

Project Applicant: Crimson Resource Management Corp. (Crimson)

Project Location: Kern County, Midway-Sunset Oil Field; 25/31S/22E/MD;
35.20911789, -119.55897522

Project Description: Crimson proposes to rework 2 existing wells located in the Midway-Sunset Oil Field. The proposed reworks consist of pulling the existing liner and replacing it with the same size liner at the same depth. The purpose for the reworks is that the wells have experienced excessive sand influx through the existing slotted interval indicating slot damage. This project is expected to last four to five days. Temporary equipment for the project includes one (1) production hoist, one (1) circulating pump, one (1) shale bin, one (1) vacuum truck, one (1) tool support truck, one (1) pipe trailer, and one (1) 3/4-ton pickup truck. A production rig, approximately 95 feet in height, will be utilized to pull the existing production string, change the liner and run the same string for production. All equipment will be staged on the existing location. The proposed rework activities will complete the wells into the same zone that the wells were previously completed in with no pool change.

The wells are located on an existing well pad with existing access roads located within a densely developed oil field. No expansion of the existing well pad, roads, staging areas, or pipelines are proposed. Reworking activities and return to operation of the existing wells include the following phases: reworking and equipping phase, a production phase, and a plugging and abandonment phase. All proposed work will comply with all updated California Department of Conservation, Geologic Energy Management Division (CalGEM) regulations. The existing well site is maintained free of vegetation based on permits previously received from CalGEM for the original preparation of the well pad and drilling of the existing wells.

The proposed project consists of CalGEM approving 2 permits for Crimson to rework the wells listed below, in the Midway-Sunset Oil Field.

API #	Well Name
0403054485	19-02
0403056193	17-01

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>)	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 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		15302	
<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 type="checkbox"/> Class 7: Protection of Natural Resources		15307	
<input 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): 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.” Additionally, in accordance with 14 CCR § 1684.1 the Class 1 exemption consists of operation repair, maintenance, minor alternation of existing public or private structures, facilities, mechanical equipment, or topographical features involving negligible or no expansion of use beyond that existing previously. This Class includes but is not limited to conversion, and abandonment work on oil, gas, injection, and geothermal wells involving the alteration of well casing, such as perforating and casing repair, removal, or replacement; installation or removal of downhole production or injection equipment, cement plugs, bridge plugs, and packers set to isolate production or injection intervals. The project will include pulling the existing liner and replacing it with the same size liner at the same depth. No expansion of the existing well pad, roads, staging areas, or pipelines are proposed, and the completion design will be the same as the original wellbores. According to a CalGEM engineer, the proposed work is within the scope of UIC project 46400038 and would be a continuation of operations within the confines of the UIC project as permitted by the Project Approval Letter (PAL). Therefore, the changes to the existing facilities would be negligible and would not expand the existing use.

Class 2, Replacement or Reconstruction (14 CCR § 15302): Class 2 applies because it 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 and will have substantially the same purpose and capacity as the structure replaced[.]” Examples of Class 2 include, but are not limited to, “[r]eplacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity.” The project will include pulling the existing liner and replacing it with the same size liner at the same depth, and the completion design will be the same as the original wellbores. According to a CalGEM engineer, the proposed work is within the scope of UIC project 46400038 and would be a continuation of operations within the confines of the UIC project as permitted by the PAL. Therefore, the proposed project consists of replacement or reconstruction and would not change the purpose or capacity of the wells.

Class 4, Minor Alterations to Land (14 CCR §§ 15304, 1684.2): Class 4 exemption applies. The proposed project would be conducted entirely on an existing pad with enough space to contain all equipment. The project will include pulling the existing liner and replacing it with the same size liner at the same depth, and the completion design will be the same as the original wellbores. According to a CalGEM engineer, the proposed work is within the scope of UIC project 46400038 and would be a continuation of operations within the confines of the UIC project as permitted by the PAL. No expansion of the existing well pad, roads, staging areas, or pipelines are proposed. The proposed project is located within an industrial area, and the existing well site is maintained free of vegetation based on permits previously received from CalGEM for the original preparation of the well pad and drilling of the existing wells. Therefore, the proposed 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.”

