

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:** 601209\_Group\_PCEC\_P&A

**Project Applicant:** Pacific Coast Energy Company LP

**Project Location:** Los Angeles County, Beverly Hills Oil Field; 30/01S/14W/SB; Latitude 34.05554962, Longitude -118.39025116

**Project Description:** The project would plug and abandon three oil and gas production wells in order to address regulatory deficiencies in the wells. Operations include cleaning out the wells, laying cement plugs, perforating, cutting casing, and pulling casing. The area is within an existing oil field on existing well pads. The project is expected to take up to two weeks to complete. Temporary equipment such as a coil tubing unit and cement equipment will be needed. No permanent facilities will be constructed. No expansion of associated facilities will be required. Waste materials will be properly disposed of as non-hazardous waste, as appropriate, at a facility licensed to accept the waste.

The proposed project consists of the California Department of Conservation, Geologic Energy Management Division (CalGEM) approving three permit(s) for Pacific Coast Energy Company LP to abandon the wells listed below, in the Beverly Hills Oil Field.

API #	Well Name
0403720886	West Pico 24
0403720382	West Pico 17
0403721950	West Pico 44

**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"/>	<b>Statutory Exemption:</b>			
<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"/>	<b>Categorical Exemption:</b>	21084		
<input checked="" type="checkbox"/>	<b>Class 1:</b> Existing Facilities		15301	1684.1
<input checked="" type="checkbox"/>	<b>Class 2:</b> Replacement or Reconstruction		15302	
<input type="checkbox"/>	<b>Class 3:</b> New Construction/Conversion of Small Structures		15303	
<input checked="" type="checkbox"/>	<b>Class 4:</b> Minor Alterations to Land		15304	1684.2
<input checked="" type="checkbox"/>	<b>Class 7:</b> Protection of Natural Resources		15307	
<input checked="" type="checkbox"/>	<b>Class 8:</b> Protection of the Environment		15308	
<input type="checkbox"/>	<b>Class 11:</b> Accessory Structures		15311	
<input type="checkbox"/>	<b>Class 21:</b> Enforcement Actions to revoke a permit		15321	
<input type="checkbox"/>	<b>Class 30:</b> Minor Actions to Prevent, Minimize, Stabilize, Mitigate, or Eliminate a Release (Actual or Threat) of Hazardous Substances (Waste or Material)		15330	
<input type="checkbox"/>	<b>Class 33:</b> Small Habitat Restoration Projects		15333	
<input type="checkbox"/>	<b>General Exemption</b> ("common sense")		15061 (b)(3)	
<input type="checkbox"/>	<b>Not a "Project" subject to CEQA</b>		15378 (b)(2)	
<p><b>CEQA Exceptions to the Exemptions (14 CCR § 15300.2):</b> 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.

**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 alterations to three existing wells and would not expand the use of the wells. 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." This includes "perforating and casing repair" as well as installation of "cement plugs" (14 CCR §§ 15301, 1684.1). The proposed project would rework three existing oil and gas production wells by laying cement plugs, perforating, and pulling casing in order to plug and abandon the wells. This work would not alter the existing use of the wells and would not expand their capacity.

**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 three existing wells and would not change the purpose or capacity of the wells. Class 2 consists of 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 as the structure replaced" (14 CCR § 15302). The proposed project would reconstruct the wellbores of three existing oil and gas production wells by laying cement plugs, perforating, and pulling casing in order to plug and abandon the wells. This work would be done on existing well pads in an existing oil field. The work would not expand the existing 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 a negligible effect 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 §§ 15304, 1684.2). The proposed project would rework three existing oil and gas production wells by laying cement plugs, perforating, and pulling casing in order to plug and abandon the wells. The work would take place on existing well pads in an existing oil field located in a developed urban area. The project does not involve the expansion of existing facilities or the construction on new facilities and would utilize existing facilities including roads and pipelines. Therefore, there would be no new ground disturbance that could impact the surrounding environment.

**Classes 7 and 8, Protection of Natural Resources and the Environment (14 CCR §§ 15307, 15308):**

The project is exempt under the Class 7, Protection of Natural Resources and Class 8, Protection of the Environment because the proposed work would assure the maintenance of natural resources and the environment. Class 7 consists of "actions taken by regulatory agencies as authorized by state law or local ordinance to assure the maintenance, restoration, or enhancement of a natural resource where the regulatory process involves procedures for protection of the environment" (14 CCR § 15307). Class 8 consists of "actions taken by regulatory agencies, as authorized by state or local ordinance, to assure the maintenance, restoration, enhancement, or protection of the environment where the regulatory process involves procedures for protection of the environment" (14 CCR § 15308). Both exemptions exclude "construction activities" (14 CCR §§ 15307, 15308). The proposed project would rework three existing oil and gas production wells by laying cement plugs, perforating, and pulling casing in order to plug and abandon the wells. This work would assure the maintenance of natural resources and the environment by addressing regulatory deficiencies in the wells. The work requires negligible changes to the wells and does not involve any expansion of facilities that would require construction activities.

**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

