

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: 623822_Group_SPR_UIC

Project Applicant: Sentinel Peak Resources California LLC (SPR)

Project Location: Kern County, Cymric Oil Field, 06/30S/22E/MD; 35.34736000/-
119.65397300

Project Description: SPR proposes to rework 23 existing wells located in the Cymric Oilfield. The wells will be completed in the same reservoir as the original wellbore. The completion design will be the same as the original wellbore. The project will include:

Plugging back an existing perforation interval with cement and adding additional perforations to the existing perforated interval. Work will require the following equipment:

Rig to pull/run tubing and lay the cement plug; (2) Bulk Truck and (3) Pump to plug back the existing wellbore; and (4) Wireline Truck to add perforations. Deliveries are limited to water. All travel to/from the project location will occur on established roadways and no expansion is required. The speed limit while on SPR property is 15 mph. Dust is controlled via water trucks pursuant to SPR's Dust Control Plan.

The project is estimated to take 2 days to complete with 10-hour per day operations from 6:00AM-5:00PM. The work will be completed in the Summer/Fall/Winter. The existing well pad can accommodate all associated equipment, materials storage, and operations including deliveries and personnel parking. Any undisturbed vegetation will be avoided, and all work will occur on the existing disturbed pad only. No expansion of the existing well pad, road, staging areas or pipelines is required. Freshwater requirements are less than 50 barrels per well to mix the cement used for plugging back the existing perforation interval. Water will be supplied by the West Kern Water District from a local meter on the lease. No new pumps, facilities, or flowlines will be installed. Storage, transmission, and processing will be handled utilizing existing infrastructure. Electricity will be supplied from existing systems. No expansion of the existing facilities is required.

The proposed project consists of the California Department of Conservation, Geologic Energy Management Division (CalGEM) approving 23 permits for SPR to rework the wells listed below, in the Cymric Oil Field.

API #	Well Name
0403069322	Gamble 1 I-11R
0403069314	Gamble 1 I-19R
0403069321	Gamble 1 I-20R2
0403069323	Gamble 1 I-22R
0403069317	Gamble 1 I-23R
0403069318	Gamble 1 I-24R
0403069320	Gamble 1 I-25
0403069310	Gamble 1 I-27
0403069319	Gamble 1 I-28
0403069326	Gamble 1 I-30
0403069336	Gamble 1 I-31
0403069312	Gamble 1 I-32
0403069313	Gamble 1 I-5R
0403069327	Gamble 1 I-6R
0403069315	Gamble 1 I-7R
0403069324	Gamble 1 I-9R
0403068372	Welport I-45
0403069346	Welport I-46
0403068373	Welport I-47
0403069361	Welport I-48
0403069239	Welport I-50
0403069155	Welport I-52
0403069156	Welport I-53

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)	
"	Statutory Exemption:			
	.. Ongoing Project (<i>pre-CEQA approval on April 5, 1973</i>)	21169	15261 (b)	
	" Ministerial	21080 (b)(1)	15268	
	" Declared Emergency	21080 (b)(3)	15269 (a)	
	" Emergency Projects	21080 (b)(4)	15269 (b) or (c)	
"	Categorical Exemption:	21084		
	<input checked="" type="checkbox"/> Class 1: Existing Facilities		15301	1684.1
	<input checked="" type="checkbox"/> Class 2: Replacement or Reconstruction		15302	

Exemption Type		Statute (PRC)	Regulation (14 CCR)	
..	Class 3: New Construction/Conversion of Small Structures		15303	
<input checked="" type="checkbox"/>	Class 4: Minor Alterations to Land		15304	1684.2
..	Class 7: Protection of Natural Resources		15307	
..	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	
..	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): 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 plugging back an existing perforation interval with cement and adding additional perforations to the existing perforated interval. The proposed work confirms there is no expansion required

and that travel to and from the existing well pads can accommodate all associated equipment. The completion design will be the same as the original wellbores, and according to a CalGEM engineer, the proposed work is within the scope of UIC project 19024124 and would be a continuation of operations within the confines of the UIC project as permitted by the Project Approval Letter (PAL). Additionally, any undisturbed vegetation will be avoided, supporting current topographical features involving negligible or no expansion. 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, “Replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity.” The completion design will be the same as the original wellbores, and according to a CalGEM engineer, the proposed work is within the scope of UIC projects 19024122, 19024128 and would be a continuation of operations within the confines of the UIC project as permitted by the PAL. The proposed operations are to plug back the lower portion, add new perforations, then return the well back to injection and production. Therefore, the proposed project location would be at 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): Class 4 exemption applies. The proposed project would be conducted entirely on existing pads with enough space to contain all equipment. The completion design will be the same as the original wellbores and the work will require equipment that can be supported by the existing well pads. The project will include plugging back an existing perforation interval with cement and adding additional perforations to the existing perforated interval, which would not disturb any undisturbed areas. No expansion of the existing well pads, road, staging areas or pipelines is required. The proposed project is located within an industrial area. The completion design will be the same as the original wellbores and according to a CalGEM engineer, the operations have no modifying effect on UIC project 19024124. 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.”

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: _____ **Date:** _____

DocuSigned by:
Mila Galevski
Department of Conservation,
Geologic Energy Management Division