

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: 512758_Group_CRPC_OG

Project Applicant: California Resources Production Corporation (CRPC)

Project Location: Sacramento County, Rio Vista Gas Field; 33/04N/03E/MD;
 38.14930652, -121.65006065

Project Description: CRPC proposes to rework three existing production wells located in the Rio Vista Gas Field. The proposed reworks consist of pulling production tubing and packer, cement squeezing perforations, drilling out cement, running production tubing, selectively perforating, and returning to production. The proposed reworks are located on existing, well-maintained well pads, and the reworked wells will fit into existing infrastructure, such as production pipelines, powerlines, access roads, production facilities, and non-oil and gas facilities. The proposed activities will not require new disturbance or expansion of facilities.

The proposed project consists of the California Department of Conservation, Geologic Energy Management Division (CalGEM) approving three permits for CRPC to rework the wells listed below, in the Rio Vista Gas Field.

| API # | Well Name |
|------------|----------------|
| 0406720538 | CRC-RV GU 33-2 |
| 0406720523 | Welch 24 |
| 0406720430 | Welch 13 |

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) | |
| <p><u>CEQA Exceptions to the Exemptions (14 CCR § 15300.2):</u> 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 changes to an existing well involving no expansion of the existing use of the well. 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, removal, or replacement[.]" 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 proposed activity involves cement squeezing perforations and selectively perforating the wells into the same formations. 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. The wells are and would remain production wells with substantially the same capacity. Therefore, there would be no expansion of use beyond that previously existing.

Class 2, Replacement or Reconstruction (14 CCR § 15302): Class 2 exemption 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.” These are reworks that involve pulling and replacing production tubing and selectively squeezing perforations and then reperforating to replace the perforations into the same formations of existing production wells and do not propose changes to the structure of the wells (the wellbores). The location of the wells would not change, nor would the underground structure of the wells (the wellbores), nor would the purpose of the wells, which is production. After the reworks, the wells would have substantially the same capacity. Therefore, the proposed project consists of replacement or reconstruction and would not change the purpose or capacity of the well.

Class 4, Minor Alterations to Land (14 CCR §§ 15304, 1684.2): 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 § 1684.2; see also 14 CCR § 15304). The proposed project would be conducted entirely on existing pads with enough space to contain all equipment. The project includes cement squeezing perforations and selectively perforating existing production wells; the completion design would be the same as the original wellbores. No expansion of the existing well pads, roads, staging areas, or pipelines are proposed. The proposed project is located within an industrial area. 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: Nicole Trezza **Date:** 1/21/2025
Department of Conservation,
Geologic Energy Management Division