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: 569730_SPR_UIC

Project Applicant: Sentinel Peak Resources California LLC (SPR)

Project Location: Kern County, Midway-Sunset Oil Field; 22/32S/23E/MD; 35.12485500, -119.4938710

Project Description: SPR proposes to rework an existing cyclic steam well located in the Midway-Sunset Oil Field. The proposed rework consists of plugging back an existing perforation interval with cement and adding perforations to the same reservoir as the existing completion interval. The well would be completed in the same reservoir as the original wellbore, and the completion design would be the same as the original wellbore.

Work would require the following equipment: (1) rig to pull/run tubing and lay the cement plug; (1) bulk truck and (1) pump to plug back the existing wellbore; and (1) wireline truck to add perforations. Travel to/from the project location would occur on established roadways and no expansion is required. Dust is controlled via water trucks pursuant to SPR's Dust Control Plan. The project is estimated to take 5 days to complete with 10-hour per day operations from 6:00 AM-5:00 PM.

No new pumps, facilities, or flowlines would be installed. Storage, transmission, and processing would be handled utilizing existing infrastructure. Electricity would be supplied from existing systems. No expansion of the existing facilities is required.

The existing well pad can accommodate all associated equipment, materials storage, and operations including deliveries and personnel parking. Any undisturbed vegetation would be avoided, and all work would occur on the existing disturbed pad only. No expansion of the existing well pad, roads, staging areas, or pipelines is required.

The proposed project consists of the California Department of Conservation, Geologic Energy Management Division (CalGEM) approving a permit for SPR to rework the well listed below, in the Midway-Sunset Oil Field.

API #	Well Name
0403063961	Keene 98

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 (*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)	
☑ **Categorical Exemption:**	21084		
☑ **Class 1**: Existing Facilities		15301	1684.1
☑ **Class 2**: Replacement or Reconstruction		15302	
☐ **Class 3**: New Construction/Conversion of Small Structures		15303	
☑ **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

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." 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 consists of reworking an existing cyclic steam well to plug back an existing perforation interval with cement and add perforations to the same reservoir as the existing completion interval. No expansion of the existing well pad, roads, staging areas, or pipelines are proposed, and the completion design would be the same as the original wellbore. According to a CalGEM engineer, the proposed work is within the scope of UIC project 46400385 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 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." The project would include reworking an existing injection well to pull and replace tubing, plug back an existing perforation interval with cement, and replace perforations to the same reservoir as the existing completion interval, and the completion design would be the same as the original wellbore. According to a CalGEM engineer, the proposed work is within the scope of UIC project 46400385 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 well.

Class 4, Minor Alterations to Land (14 CCR §§ 15304, 1684.2): Class 4 exemption applies. 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 an existing pad with enough space to contain all equipment. The project would include reworking an existing injection well to plug back an existing perforation interval with cement and add perforations to the same reservoir as the existing completion interval, and the completion design would be the same as the original wellbore. No expansion of the existing well pad, 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:** 1/22/2025

Department of Conservation,
Geologic Energy Management Division