

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: 537914_Group_Aera_UIC

Project Applicant: Aera Energy LLC (Aera)

Project Location: Kern County, Midway-Sunset Oil Field; 14/31S/22E/MD;
 35.23360443, -119.58633423

Project Description: Aera proposes to rework two existing steamflood wells located in the Midway-Sunset Oil Field. The proposed reworks consist of removing casing patches, patching perforations, cement squeezing perforations, and adding perforations. Temporary equipment for the project would include a workover rig, wireline unit, cementing equipment, pump, tank, power swivel, pickup truck, and delivery truck. The entirety of this work is in an area of existing disturbance and no change in the surface topography (such as drainage patterns) is included in the work design. No new grading will occur in undisturbed areas. Regular operations at the site would include removal of weeds and other ruderal vegetation for fire control and road maintenance.

The work will occur on existing well pads and work locations will be accessed using existing access roads. The work will involve installation of various above-ground piping to connect well sites to existing infrastructure. No new infrastructure will occur as a result of the work.

The proposed project consists of the California Department of Conservation, Geologic Energy Management Division (CalGEM) approving two permits for Aera to rework the wells listed below, in the Midway-Sunset Oil Field.

API #	Well Name
0403024894	Finley-Johnson-Fox 4711
0403028299	Pru T56I

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>) <input type="checkbox"/> Ministerial <input type="checkbox"/> Declared Emergency <input type="checkbox"/> Emergency Projects <input checked="" type="checkbox"/> Categorical Exemption: <input checked="" type="checkbox"/> Class 1: Existing Facilities <input checked="" type="checkbox"/> Class 2: Replacement or Reconstruction <input type="checkbox"/> Class 3: New Construction/Conversion of Small Structures <input checked="" type="checkbox"/> Class 4: Minor Alterations to Land <input type="checkbox"/> Class 7: Protection of Natural Resources <input type="checkbox"/> Class 8: Protection of the Environment <input type="checkbox"/> Class 11: Accessory Structures <input type="checkbox"/> Class 21: Enforcement Actions to revoke a permit <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) <input type="checkbox"/> Class 33: Small Habitat Restoration Projects <input type="checkbox"/> General Exemption ("common sense") <input type="checkbox"/> Not a "Project" subject to CEQA	21169	15261 (b)	
	21080 (b)(1)	15268	
	21080 (b)(3)	15269 (a)	
	21080 (b)(4)	15269 (b) or (c)	
	21084		
		15301	1684.1
		15302	
		15303	
		15304	1684.2
		15307	
		15308	
		15311	
		15321	
	15330		
	15333		
		15061 (b)(3)	
		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 consists of reworking two steamflood wells to remove casing patches, patch perforations, cement squeeze perforations, and add perforations. No expansion of the existing well pads, roads, staging areas, or pipelines are proposed, and the completion design would be the same as the original wellbores. According to a CalGEM engineer, the proposed work is within the scope of UIC projects 46400119 and 46400272 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 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[.]” 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 consists of reworking two steamflood wells to remove casing patches, patch perforations, cement squeeze perforations, and replace perforations, and the completion design would be the same as the original wellbores. According to a CalGEM engineer, the proposed work is within the scope of UIC projects 46400119 and 46400272 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. 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 consists of reworking two steamflood wells to remove casing patches, patch perforations, cement squeeze perforations, and add perforations, and 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,

