

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:** 537798\_Group\_PG&E\_UGS

**Project Applicant:** Pacific Gas and Electric Company (PG&E)

**Project Location:** Contra Costa County, Los Medanos Gas Field; 07/02N/01W/MD;  
38.02666855, -122.01119995

**Project Description:** PG&E proposes to rework three existing gas storage wells in order to meet CalGEM Underground Gas Storage inspection and construction requirements as specified in 14 CCR § 1726. The proposed scope of work includes the following activities: retrieve existing tubing string and packer; retrieve production liner; perform casing integrity wireline surveys; replace existing wellhead; install new production liner and gravel pack; and install new tubing string and packer. The proposed project will require, at a minimum, the following equipment: workover rig (double); mud pumps; cuttings bin; blowout prevention equipment and accumulator; generator; fuel tank; fluid tanks; and light towers. The project is anticipated to last until November 2025. The wells will be returned to service as gas storage wells with no change or expansion of existing use.

All equipment will be staged and operated within the existing facility footprint and existing roadways will be used for access. This includes all ancillary equipment which may be required such as pump trucks, vac trucks, and casing storage. No new surface construction activities are planned with the reworks. No new permanent facilities will be constructed and no expansion to associated facilities or roadways will be required.

Waste material will be properly disposed of as non-hazardous or hazardous waste at a facility licensed to accept the waste. Secondary containment will be utilized for liquid HazMats and workover fluids. No erosion controls will be required as these sites are all graveled. Water will be applied as mitigation for dust suppression from vehicle traffic.

The proposed project consists of the California Department of Conservation, Geologic Energy Management Division (CalGEM) approving permits for PG&E to rework the wells listed below, in the Los Medanos Gas Field in Contra Costa County.

API #	Well Name
0401320138	Los Medanos 2-A
0401320307	Los Medanos 12-C
0401320115	Los Medanos 3-A

**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 type="checkbox"/> <b>Class 7:</b> Protection of Natural Resources		15307	
<input 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)	
<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.			

**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):** Class 1 consists of the "operation, repair, maintenance, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features involving negligible or no expansion of use beyond that existing previously." (14 CCR §§ 15301, 1684.1.) The proposed project would perform maintenance on three existing gas storage wells by performing casing integrity surveys, replacing the wellhead, and installing a new production liner and tubing and packers. This work would be done to maintain the integrity of the wells and comply with CalGEM requirements under 14 CCR § 1726 et seq. to enhance the safety of UGS projects. The wells would remain gas storage wells with substantially the same capacity. 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 the reworks consist 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 replace the wellheads, production liner, tubing, and packers on three existing gas storage wells. Accordingly, the replacements would be located on the same site as the structures replaced. These replacements would maintain the integrity of the wells and meet CalGEM requirements under 14 CCR § 1726 et seq. to enhance the safety of UGS projects. The wells would be returned to service as gas storage wells with substantially the same capacity. 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 applies because the reworks consist 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 rework three existing wells, which are located on two well pads that can accommodate the necessary equipment and can be accessed by existing roads. The project would not require the expansion of existing facilities or the construction of new facilities. There would be no new ground disturbance. Therefore, the proposed project would 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,

