

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: 491233_Group_Aera_OG_UIC

Project Applicant: Aera Energy LLC (Aera)

Project Location: Monterey County, San Ardo Oil Field; 11/23S/10E/MD;
 35.94930267, -120.85266876

Project Description: Aera proposes to rework six existing production wells located in the San Ardo Oil Field. The proposed reworks consist of adding perforations, temporary plugback, and pulling and replacing the existing liner. Temporary equipment for the project would include a workover rig, wireline unit, cementing equipment, pump, tank, pickup truck, and delivery truck. The entirety of this work is in an area of existing disturbance in an established oil field, and no change in the surface topography (such as drainage patterns) is included in the work design. No new grading would 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 would occur on existing well pads and work locations would be accessed using existing access roads. The work would involve installation of various above-ground piping to connect well sites to existing infrastructure. No new infrastructure would occur as a result of the work.

The proposed project consists of the California Department of Conservation, Geologic Energy Management Division (CalGEM) approving six permits for Aera to rework the wells listed below, in the San Ardo Oil Field in Monterey County.

API #	Well Name
0405321276	Ferrini 1099-11
0405322021	Orradre 1456-11
0405322405	Orradre 1461-12
0405322493	Orradre 1354-11
0405321825	Orradre 1594-11
0405322030	Orradre 1319-12

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 existing wells involving no expansion of the existing use of the wells. Class 1 exemption consists of operation, repair, maintenance, or 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 includes "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." (14 CCR § 1684.1.) The project consists of adding perforations, temporary plugback, and pulling and replacing the existing liner. 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 project 64403002 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." (14 CCR § 15302.) The project consists of adding perforations, temporary plugback, and pulling and replacing the existing liner, 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 project 64403002 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 on 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. 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 adding perforations, temporary plugback, and pulling and replacing the existing liner, 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 a developed oil field. 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, 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:** 1/31/2025
Department of Conservation,
Geologic Energy Management Division