

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: 590717_Group_Berry_UIC

Project Applicant: Berry Petroleum Company, LLC

Project Location: Kern County, South Belridge Oil Field; 19/28S/21E/MD;
 Latitude 35.48330688, Longitude -119.75778961

Project Description: The proposed project is to rework eight waterflood injection wells to continue resource development. Rework operations include performing a Standard Annulus Pressure Test (SAPT) on the wells. If casing is damaged, it will be remediated by welding a sleeve over damaged sections, cement squeeze, or replacement, with a contingency to sidetrack. The proposed project is estimated to take 40 days per well once work has begun. The total project footprint for each well in this project is estimated to be less than 0.5 acres. The project will utilize a workover rig, and various temporary support equipment that include delivery trucks, backhoes, and pickup trucks. The well pad will be able to accommodate all associated equipment and operations, including personnel parking. The rig will then conduct day-light operations until work is completed. The rig operations and equipment will then be demobilized and removed from the site. No production facilities and no new ground surface disturbance will be associated with the reworks.

The grouping initially proposed reworking eight wells. Five of the wells were determined to have integrity issues that required swift action for the protection of public health, safety, and the environment and received expedited review. The work was approved with a prior exemption and the optional NOE was not filed. The scope of this review is the rework of the remaining three wells from the initial grouping. The previously reviewed wells are listed below.

API #	Well Name
0403041651	Hill 622CW
0402978100	Hill 244F
0402978120	Hill 244JW
0403001559	Hill 462W
0403047788	Hill 663CW

The proposed project consists of the California Department of Conservation, Geologic Energy Management Division (CalGEM) approving three permit(s) for Berry Petroleum Company, LLC to rework the wells listed below, in the South Belridge Oil Field.

API #	Well Name
0403044506	Hill 621EW
0402977997	Hill 231J
0402977756	Hill 242W

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)	

Exemption Type	Statute (PRC)	Regulation (14 CCR)
<p>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.</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):

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 make minor alterations to three existing injection wells by pressure testing and remediating the casing as necessary. Remediation may include welding a sleeve over damaged sections, cement squeeze, or replacement of the casing. This work would be done to maintain the integrity of the casing and would not change the existing use of the wells. The wells would remain injection wells with substantially the same capacity. Additionally, a CalGEM engineer has confirmed that the proposed work would be a continuation of operations within UIC Project 05200023, as permitted by the project approval letter (PAL).

Class 2, Replacement and Reconstruction (14 CCR § 15302):

Class 2 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[.]" (14 CCR § 15302.) The proposed project would make minor alterations to three existing injection wells by pressure testing and remediating the casing as necessary. Remediation may include welding a sleeve over damaged sections, cement squeeze, or replacement of the casing. This work would be done on the existing wellbores, which are located on existing well pads. The proposed work is maintenance meant to maintain the integrity of the casing and would not change the existing use of the wells. Additionally, a CalGEM engineer has confirmed that the proposed work would be a continuation of operations within UIC Project 05200023, as permitted by the PAL.

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 rework three existing injection wells, which would result in negligible effects to the existing environment. The wells are located on existing well pads that are large enough to accommodate the necessary equipment and can be accessed by existing roads. There would be no construction of new facilities or expansion of existing facilities. Therefore, the project would not result in any surface disturbance that could impact the existing condition of the surrounding environment.

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

