

State of California
 Natural Resources Agency / Department of Conservation
 GEOLOGIC ENERGY MANAGEMENT DIVISION

California Environmental Quality Act Notice of Exemption

To: Office of Land Use & Climate Innovation
 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: 645648_Calgren_CC

Project Applicant: dba Calgren Renewable Fuels

Project Location: Tulare County, Any Field; 25/22S/23E/MD; Latitude 35.98500000,
 Longitude -119.42972222

Project Description: The proposed project would rework an existing stratigraphic well to confirm final plug depth and convert to an observation well. The proposed work includes placing a cement plug, testing, perforating and breaking down perforations with freshwater or performing cement squeeze to isolate. Well completion is expected to take approximately 14 days to complete. A work-over rig will be used to complete the well. Vehicles will be used to transport equipment, materials, and personnel on-site. Waste materials (solid and liquid) will be properly stored and disposed of as non-hazardous or hazardous waste, as appropriate, at a facility licensed to accept the waste. No hydrocarbons or formation fluid are expected to be produced. If any fluid is produced during planned completion operations, it will be disposed of as non-hazardous or hazardous waste, as appropriate, at a facility licensed to accept the waste. The well pad was previously constructed, thus, there will be no vegetation cleaning or soil work.

The proposed project consists of the California Department of Conservation, Geologic Energy Management Division (CalGEM) approving one permit for dba Calgren Renewable Fuels to rework the well listed below.

API #	Well Name
0410720283	TCCSP OBS 1

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 checked="" type="checkbox"/> Class 6: Information Collection			
	<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>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):

The proposed project is exempt under the Class 1, Existing Facilities exemption because it would make negligible changes to an existing stratigraphic well. 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 § 1684.1.) The project would convert an existing stratigraphic to observation by placing a cement plug, testing, and perforating and breaking down perforations with freshwater or performing cement squeeze to isolate. The well would be used for information

gathering purposes, which would not expand its existing capacity as a stratigraphic well.

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

The proposed project is exempt under the Class 2, Replacement or Reconstruction exemption because it would reconstruct the casing of an existing well and would not substantially change the purpose or capacity of the well. Class 2 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[.]” (14 CCR § 15302.) The project would reconstruct the casing of an existing stratigraphic well by placing a cement plug, perforating, and isolating perforations by breaking them down with freshwater or performing cement squeeze. The work would take place on an existing well pad on an existing wellbore. The project would not substantially change the purpose or capacity of the well, as the well would be converted to an observation well and would be used for information gathering purposes.

Class 4, Minor Alterations to Land (14 CCR §§ 15304, 1684.2):

The proposed project is exempt under the Class 4, Minor Alterations to Land exemption because it involves minimal surface disturbance. 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 work would take place on an existing well pad that is larger enough to accommodate the necessary equipment and can be accessed by existing roads. The project does not involve any vegetation clearing or soil work. The well is not located in an oil field; however, the surrounding area is barren land with no shrubs or adjacent water bodies. There will be no electrical work, as any equipment or devices installed for the project would be self-powered with solar panels for readouts. Therefore, the project would make negligible changes to the existing facilities.

Class 6, Information Collection (14 CCR § 15306):

The proposed project is exempt under the Class 6, Information Collection exemption because it would convert an existing well to observation for data collection purposes. Class 6 consists of “basic data collection, research, experimental management, and resource evaluation activities which do not result in a serious or major disturbance to an environmental resource. These may be strictly for information gathering purposes, or as part of a study leading to an action which a public agency has not yet approved, adopted, or funded.” (14 CCR § 15306.) The recompletion of the existing stratigraphic well to an observation well would support the development of the carbon capture and storage project Tulare County Carbon Sequestration Project (TCCSP). Data gathered through this well would include continuous pressure and temperature measurements at the bottomhole. This data will be used to establish a baseline downhole condition prior to any injection as well as gather periodic downhole data to assess the impact of injection into deeper formations. Data gathered will also be used to calibrate computational models that simulate subsurface injection and reservoir response as well as periodically evaluate project design and area per U.S. EPA requirements.

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

