

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:** 546216\_Group\_SPR\_UIC\_OG

**Project Applicant:** Sentinel Peak Resources California LLC

**Project Location:** Kern County, Cymric Oil Field; 06/30S/22E/MD; Latitude 35.34529114,  
 Longitude -119.65943146

**Project Description:** The proposed project would rework two oil and gas production wells and one cyclic steam well by plugging back the existing perforation intervals with cement and adding additional perforations. Work will require the following equipment: a rig to pull/run tubing and lay the cement plug, a bulk truck and a pump to plug back the existing wellbore, and a wireline truck to add perforations. The existing well pads can accommodate all associated equipment, materials storage, and operations including deliveries and personnel parking. Any undisturbed vegetation will be avoided, and all work will occur on the existing disturbed pad only. No expansion of the existing well pad, road, staging areas or pipelines is required.

The grouping initially proposed reworking five wells. Two 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
0403044158	McKittrick Front 5160
0403051891	McKittrick Front 6150

The proposed project consists of the California Department of Conservation, Geologic Energy Management Division (CalGEM) approving 3 permits for Sentinel Peak Resources California LLC to rework the well(s) listed below, in the Cymric Oil Field.

API #	Well Name
0403035005	McKittrick Front 541J
0403067135	McKittrick Front 6320 R

0403049997	Star Fee 8920
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**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 checked="" type="checkbox"/> <b>Class 7:</b> Protection of Natural Resources		15307	
	<input checked="" 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)	
<p><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.</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 because the project would make minor alterations to existing wells with negligible changes to the existing use of the wells. 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." This includes "remedial, maintenance, 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." (14 CCR § 1684.1.) The project involves remedial maintenance work on three existing wells, including plugging back the existing perforation intervals with cement and adding additional perforations. These are negligible changes that would not result in significant impacts to surface or subsurface conditions. A CalGEM engineer has confirmed that the proposed work is within the scope of UIC projects 19024022 and 19024124, and the purpose of the proposed operations is the continuation of operations within the UIC projects as approved by the PALs. A CalGEM engineer has confirmed that the work proposed is not part of a 2024 addendum to the 19024022 PAL. Additionally, this work is meant to address subsidence issues under a mitigation plan per CalGEM's Order to Perform Remedial Work No. 1296 and would not substantially increase the capacity of the wells. Therefore, the work would not involve a change in use.

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

The project is exempt under the Class 2, Replacement or Reconstruction exemption because the project would reconstruct the casing and wellbores of three existing wells and would not substantially change the purpose or capacity of the wells. 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 and wellbores of three existing wells by plugging back the existing perforation intervals with cement and adding additional perforations. The work would take place on the existing well pads and wellbores. The reworks would not substantially change the purpose or capacity of the wells, as a CalGEM engineer has confirmed that the proposed work is a continuation of the approved UIC projects 19024022 and 19024124. Additionally, this work is meant to address subsidence issues per CalGEM's Order to Perform Remedial Work No. 1296 and would not substantially increase the production capacity of the wells.

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

The project is exempt under the Class 4, Minor Alterations to Land because the project involves minimal surface disturbance that could significantly impact the surrounding environment. 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 project would take place on existing well pads which are large enough to accommodate the necessary equipment and can be accessed by existing roads. The project would not involve the expansion of the existing well pad, road, staging areas, or pipelines and would avoid any undisturbed vegetation. The project is located in a densely developed oil field.

Therefore, there would be negligible or no permanent effects to the surrounding environment.

**Classes 7 and 8, Protection of Natural Resources and the Environment (14 CCR §§ 15307, 15308):**

The project is exempt under Classes 7 and 8, Protection of Natural Resources and the Environment because the project would address risk to natural resources and the environment as directed by a regulatory agency. Classes 7 consist of "actions taken by regulatory agencies as authorized by state law or local ordinance to assure the maintenance, restoration, or enhancement of a natural resource where the regulatory process involves procedures for protection of the environment...Construction activities are not included in this exemption." Class 8 consists of "actions taken by regulatory agencies, as authorized by state or local ordinance, to assure the maintenance, restoration, enhancement, or protection of the environment where the regulatory process involves procedures for protection of the environment. Construction activities and relaxation of standards allowing environmental degradation are not included in this exemption." (14 CCR §§ 15307, 15308.) The proposed work is meant to address subsidence issues in the Cymric oil field per a mitigation plan developed to comply with CalGEM's Order to Perform Remedial Work No. 1296. Addressing subsidence issues will help to prevent further degradation of the surface and subsurface environment. The project does not involve the construction or expansion of facilities and therefore would not involve construction activities.

**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](mailto:CEQA@conservation.ca.gov). The notice filed with the State Clearinghouse may be accessed online at: <https://ceqanet.opr.ca.gov>

**Certified:** \_\_\_\_\_ *Mikayla Vaba* \_\_\_\_\_ **Date:** 3/10/2025  
Department of Conservation,  
Geologic Energy Management Division