

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 and 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: Reabold Monroe Swell

Project Applicant: Reabold California, LLC (Reabold)

Project Location: Monterey County, Monroe Swell Oil Field; Section 19/Township
19S/Range 07E/MDB&M; 36.25806046/ -121.25428772

Project Description: Reabold California, LLC, is seeking approval for a new Underground Injection Control (UIC) (project code 474-06-0001) in the Monroe Swell Oil Field, Monterey County. The area of review (AOR) for the Proposed Project is calculated from planned injection from this well only. The primary purpose of the Proposed Project is to reduce the routine trucking of produced water and thereby decrease road usage, erosion to dirt roads, dust and truck emissions, and noise. The project involves converting an existing idle producer oil well into a Class II UIC water disposal well, as defined under the Code of Federal Regulations (CFR), 48 CFR §144.6(b)(1), to inject fluids into the Beedy Sands of the Monterey Formation. The proposed work includes requiring a rig to pull any existing tubing or pumps from the wellbore, clean out any sediment and debris in the well, and to run in tubing and a packer for injection. Piping from the produced water facilities to the well already exist as the well is a former producer, therefore, no new piping is required. This work is expected to take less than 14 days to complete and will require no modification or expansion of surface facilities. There would be no new ground surface disturbance associated with this project.

The proposed project consists of the California Department of Conservation, Geologic Energy Management Division (CalGEM) issuing one project approval letter (PAL) for Reabold for UIC project 474-06-0001 to rework the well listed below, in the Monroe Swell Oil Field.

API #	Well Name
0405320871	Burnett 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 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 project is categorically exempt from CEQA under the "Class 1" (14 CCR § 15301) exemption per the CEQA Guidelines because the proposed project is a repair or minor alteration of existing facilities with negligible expansion of use and therefore is exempt from the need for full CEQA review. Additionally, in accordance with 14 CCR § 1684.1 the Class 1 exemption consists of operation repair, maintenance, 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 Class includes but is not limited to

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. For the project, district engineers found modest alterations to internal equipment, no complicated modifications will occur to the existing well, and the injection well will inject produced water back into an oil-bearing reservoir. District engineers and CalGEM CEQA staff determined that any environmental impacts of the proposed project would be negligible and therefore less-than-significant. The water board provided a letter of concurrence for the proposed project identifying no groundwater impacts associated with the work.

Class 2, Replacement or Reconstruction (14 CCR § 15302): Class 2 applies because it 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." The proposed project would convert an existing idle production well into a water disposal injection well. The well work is minimal and will be on the same site, all structures are existing like the wellhead, piping, well pad and roads. The project is reconstructing the existing wellbore with negligible expansion of use and therefore would have substantially the same purpose and capacity as the structure replaced.

Class 4, Minor Alterations to Land (14 CCR §§ 15304, 1684.2): Class 4 consists of "drilling operations that result in only minor alterations with negligible or no permanent effects to the existing condition of the land, water, air, and/or vegetation." The proposed project involves the issuance of a new PAL for UIC project 474-06-0001 where an existing idle producer oil well is being converted to a water disposal injection well. The process to convert the existing idle producer into an injector is simple and involves the use of existing infrastructure (other facilities, roads, and well pad). Therefore, there would be no surface disturbance as a result of the project that would significantly disturb the surrounding environment. In addition, the water board provided a letter of concurrence for the proposed project identifying no groundwater impacts associated with the work.

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: Chris Bacon

Date: 5/2/2025

Department of Conservation,
Geologic Energy Management Division