

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:** 253337\_59800002\_CalNRG\_UIC

**Project Applicant:** CalNRG Operating, LLC (CalNRG)

**Project Location:** Orange County, Richfield Oil Field; Section 28/Township 03S/Range 09W/SB B&M; 33.87550354, -117.83183289

**Project Description:** CalNRG Operating, LLC (CalNRG) is submitting an Application for Injection Approval to modify underground injection control (UIC) project 59800002. The project involves updating UIC project data necessary to obtain a new Project Approval Letter (PAL) for the Chapman waterflood project. Per the applicant's project description, changes that are being proposed as part of the project update include:

- Converting idle injection well Sterns 13 from a Kraemer injector to a Chapman injection well. This will require isolating the Kraemer zone with a bridge plug, perforating the Chapman zone, and returning the well to injection. This work is expected to take less than one week to complete and will require no modification or expansion of surface facilities. There will also be no new ground surface disturbance associated with this project.
- The injection rate into the two existing/active wells, Mobil Thompson 11 and Yarnell 28, will be reduced and diverted to the new injector (Sterns 13) where reservoir pressure is more depleted.

The proposed project consists of the California Department of Conservation, Geologic Energy Management Division (CalGEM) issuing one revised PAL to CalNRG for the modification of UIC Project No. 59800002, located within the Richfield Oil Field in Orange County. The list of injection wells that would be associated with the modified UIC project are included in the table below.

API #	Well Name
0405906475	Mobil Thompson 11
0405906496	Yarnell 28
0405920880	Mobil Sterns 13

**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 type="checkbox"/> <b>Class 6:</b> Information Collection		15306	
<input type="checkbox"/> <b>Class 7:</b> Protection of Natural Resources		15307	
<input 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)	
<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.			

**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 applies because the proposed project consists of "minor alterations" of existing wells involving "negligible or no expansion of existing or former use" (14 CCR § 1684.1). The proposed project would make minor changes to an existing waterflood well by converting the idle well to active injection, including placing a bridge plug and perforating the well, as a modification to existing UIC project 59800002. The proposed conversion and reduction in injection rate of two active waterflood wells would not require any construction or surface disturbance. The proposed project would be located on existing well pads within an existing urban oil field, in an area in which injection activities are currently present. The State Water Quality Control Board reviewed the proposed project for groundwater impacts and issued a No Objection letter on September 22, 2023. Therefore, the proposed project would result in a negligible change in existing facilities.

**Class 2, Replacement or Reconstruction (14 CCR § 15302):** Class 2 applies to the proposed project as the conversion of an existing idle well to active injection may be considered "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". The location of the project wells would not change, nor would the purpose of the wells, which is waterflood injection. Additionally, a CalGEM engineer has confirmed that the proposed work is within the scope of UIC project 59800002 and would be a continuation of operations within the UIC project.

**Class 4, Minor Alterations to Land (14 CCR §§ 15304, 1684.2):** Class 4 applies because the proposed project consists of "minor alterations with negligible or no permanent effects to the existing condition of the land, water, air, and/or vegetation" (14 CCR § 1684.2). The proposed project would reduce the injection rate for two existing waterflood wells and convert one existing idle waterflood well to active injection as part of modifications to UIC project 59800002. The proposed project would be located on existing well pads within an established urban oil field, with no proposed construction or surface disturbance, and no new roads or facilities would be constructed or expanded. Therefore, as there would be no surface disturbance, there would be no alterations to land that could impact biological resources or their habitat.

**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

