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

Geologic Energy Management Division

801 K Street, MS 18-05 Sacramento, CA 95814

Contact: Larry Kleinecke, (916) 445-9686

Project Title: PAL Reabold 072-00-0001

Project Applicant: Reabold California

Project Location: Brentwood Oil Field

County: Contra Costa Section: 17

Township: 01N Range/Baseline: 02E / MD B&M

Latitude/Longitude: 37.93871307, -121.77945709

Project Description:

The proposed new project is to allow disposal of waste water into a Class II Water Disposal well proposed to be installed in an existing well boring (Ginochio 41-17, API #0401300019) in the Brentwood oil field. The well is currently listed as plugged and abandoned.

Reabold California's lease currently has two producing wells with production approaching 300 barrels of oil per day (bopd) and 300 barrels of water per day (bwpd). Current practice is to truck produced waters off-site for disposal. The proposed project is to convert an existing well into a water disposal well, eliminating the need for routine trucking of water from the lease and restoring reservoir pressure that resulted from historic production.

The well will re-inject water from the currently producing Mokelumne River Formation - Second Massive Sand interval into the historically productive Mokelumne River - Third Massive Sand. The injection zone is a hydrocarbon producing zone and is an exempt aquifer as defined by the 1981 Brentwood Oil Field primacy boundary, which was submitted to the US EPA in 1982 with the Primacy Application.

Details on Underground Injection Control can be found on CalGEM's website at: http://www.conservation.ca.gov/calgem/Pages/Undergroundinjectioncontrol.a spx

Exempt Status:

As the Lead Agency, the Geologic Energy Management Division (CalGEM) determined that the proposed project is exempt from further environmental review requirements of the California Environmental Quality Act (CEQA), pursuant to the specified exemptions marked in the section below. The proposed project would not result in a significant adverse impact to the environment, or that any of the exceptions to the exemptions apply (14 CCR 15300.2).

Exemption Type	Statute (PRC)	Regulation (1	4 CCR)
Statutory Exemption: ☑ Ongoing Project (pre-CEQA. Approval prior to April 5, 1973) ☐ Ministerial ☐ Declared Emergency ☐ Emergency Projects	21169 21080 (b)(1) 21080 (b)(3) 21080 (b)(4)	15261 (b) 15268 15269 (a) 15269 (b) or (c)	
Categorical Exemption: ☐ Class 1: Existing Facilities ☐ Class 3: New Construction/Conversion of Small Structures ☐ Class 4: Minor Alterations to Land ☐ Class 6: Information Collection ☐ Class 7: Protection of Natural Resources ☐ Class 8: Protection of the Environment ☐ Class 11: Accessory Structures ☐ Class 21: Enforcement Actions to revoke a permit Class 30: Minor Actions to Prevent, Minimize, Stabilize, Mitigate, ☐ or Eliminate a Release (Actual or Threat) of Hazardous Substances (Waste or Material) ☐ Class 33: Small Habitat Restoration Projects	21084	15301 15303 15304 15306 15307 15308 15311 15321 15330	1684.1 1684.2
General Exemption ("common sense")		15061 (b) (3)	
Not a "Project" subject to CEQA		15378 (b)(2)	

> Reasons Why Project is Exempt:

The basis for CalGEM's determination that the project is exempt from further CEQA review is briefly explained below.

Statutory – Ongoing Project: The project is statutorily exempt because the UIC project proposes re-drilling an existing well approved before April 5, 1973 and re-purposing associated piping and equipment. The UIC activities do not involve a greater degree of responsibility and control over the project as a whole than did approval of the existing well.

Class 1 – Existing Facility: The project is categorically exempt from CEQA under the "Class 1" (14 CCR §15301) exemption per the CEQA Guidelines and CalGEM's regulations (14 CCR §1684.1) because the project proposes minor alteration of an existing previously permitted well involving a negligible expansion of former use.

Exceptions to Exemptions: CalGEM further finds that there are no exceptions to the otherwise-applicable categorical exemptions (PRC §21084; 14 CCR 15300.2(c)). 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 or that significant "cumulative impacts" would result. An important consideration is that processed wastewater is returned to the geologic zone from which it originated, cleaner than when it was removed, but still not a drinkable source. It is then reused in oil and gas extraction known as enhanced oil recovery (EOR). Existing producing wells may benefit from this EOR but are already in existence and have been approved for production. Increased production for this oil and gas field would require the operator to obtain additional permits for oil and gas production, which would require their own CEQA review.

Sucramento, CA 73614	https://ceganet.opr.co	y also be accessed online at the State Clearinghouse: a.gov	
Certified:	larry bleinecke	Date:	

Geologic Energy Management Division CEQA Unit