




# CEQA Compliance Procedures Districts

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 **DISCLAIMER:** *This document is for information purposes and should only be used as guidance. This document has neither the force of law nor regulation, nor should it be cited as the authority on CEQA requirements – always refer to applicable laws and regulations and consult with an attorney for guidance on current legal requirements.*

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# CEQA Compliance Procedures - Districts

## Introduction

The purpose of these CEQA compliance procedures includes:

- Providing continuously updated guidance to District staff
- Providing instruction on how and when to:
  - Conduct Completeness Reviews of California Environmental Quality Act (CEQA) related information and documents submitted by operators; and
  - Conduct environmental reviews as a Responsible Agency (RA) for CEQA “projects”.

Projects, as defined by CEQA, are those that require discretionary approval actions and may result in environmental impacts. **CEQA projects have been identified at DOGGR as any permit or Project Approval Letter (PAL) approval.** The term “CEQA project” should not be confused with an Underground Injection Control (UIC) or Underground Gas Storage (UGS) project, as this term is inclusive and applies to all permit and project approval requests (UIC, UGS, and Geothermal) at DOGGR.

## Background

CEQA was signed into law in 1970. It is a process that looks for ways to avoid or minimize adverse physical effects on the environment from proposed projects. It also informs decision makers and the public of possible environmental consequences of the proposed project, as well as how and why decisions are made on the project. CEQA is triggered when a public agency uses judgement to make discretionary approvals on an activity that may have a direct or indirect physical change to the environment.

DOGGR issued NTO 2018-10 to clarify its policies for operators to document compliance with CEQA on September 4, 2018. DOGGR, as a public agency, is required to conduct CEQA reviews when considering NOIs and Project Applications. Another NTO (2019-16) was issued on October 23, 2019 notifying operators that the CEQA compliance has been incorporated into WellSTAR. NTO 2019-16 also notified operators the requirement that the CEQA Indemnity Agreement be submitted with every NOI or project application was rescinded but could be requested by DOGGR on a case by case basis.

Concurrent with the September 4, 2018 NTO, The CEQA Unit developed a CEQA Operator Checklist for operators to provide DOGGR the information needed to carry out CEQA reviews. WellSTAR Release 5 (October 28, 2019) incorporated the CEQA Operator Checklist into the WST, NOI, UIC, and UGS forms. Therefore, the Checklist is no longer required to be uploaded as a separate document when Release 5 forms are used. Geothermal operators will still need to use the Checklist since geothermal is not in WellSTAR.

Incorporation of the CEQA Operator Checklist into the WST, NOI, UIC, and UGS forms allows WellSTAR to create task assignments for five newly created District and CEQA Unit workgroups (Northern, Coastal, Inland, Southern, and CEQA HQ). In general, the District CEQA Workgroups will be assigned Responsible Agency review tasks by WellSTAR and the CEQA Unit Workgroup will be assigned Lead Agency review tasks. The assignment of these task will be based on information provided by the operators in the NOI form, and therefore must be examined during the completeness

review to determine if the assignment is correct. Incorrect workgroup assignments should be reassigned as appropriate in the Review Step of WellSTAR.

## District CEQA Reviews by Program and Activity

**Table 1, CEQA Review Assignments for DOGGR Program and related activities**

Program	CEQA Review Assignments	
	Districts	CEQA Unit (HQ)
<b>Notice of Intention (NOI)</b> (a.k.a. Well Management in WellSTAR)	Conduct CEQA Responsible Agency (RA) reviews for: <ul style="list-style-type: none"> <li>• NOI projects on private land.</li> </ul>	Conduct CEQA Lead Agency (LA) reviews for: <ul style="list-style-type: none"> <li>• NOI projects on private and federal lands.</li> </ul>
<b>Geothermal</b> (Not in WellSTAR)	Conduct CEQA Responsible Agency reviews for: <ul style="list-style-type: none"> <li>• Exploratory projects and NOIs in Imperial County (Imperial County has authority from DOGGR to be LA, making DOGGR RA).</li> <li>• Field Development NOIs</li> <li>• Any other RA NOIs</li> </ul>	Conduct CEQA Lead Agency reviews for: <ul style="list-style-type: none"> <li>• Exploratory projects (except in Imperial. DOGGR prepares the environmental document for CEQA.)</li> <li>• Exploratory NOIs (except in Imperial. CEQA Unit will file LA NOD's for DOGGR NOIs relying on environmental documents prepared by DOGGR).</li> <li>• Any geothermal project or NOI that requires LA review (Example: low temp wells or small geothermal facility not considered a power generation facility by the CPUC).</li> </ul>
<b>Underground Gas Storage (UGS)</b>	Conduct CEQA Responsible Agency reviews for: <ul style="list-style-type: none"> <li>• NOIs that are part of a UGS facility (This usually falls under Well Management/NOI).</li> </ul>	Conduct CEQA reviews for: <ul style="list-style-type: none"> <li>• UGS Facilities (As Responsible Agency. CPUC is always Lead Agency.)</li> <li>• Any Lead Agency UGS NOIs</li> </ul>
<b>Underground Injection Control (UIC)</b>	Conduct CEQA Responsible Agency reviews for: <ul style="list-style-type: none"> <li>• RA Applications for Injection Approval</li> <li>• Injection NOIs (Usually falls under Well Management/NOIs).</li> </ul>	Conduct CEQA reviews for: <ul style="list-style-type: none"> <li>• LA Applications for Injection Approval</li> <li>• 2<sup>nd</sup> CEQA review for LA or RA Applications for Injection Approval</li> </ul>
<b>Well Stimulation (WST)</b>	No CEQA review responsibilities for Districts	The CEQA Unit will continue to conduct all CEQA reviews for WST applications.



For NOI/Applications on private property, Table 2 identifies DOGGR CEQA review assignments by programs/activities.

**Table 2. CEQA Review Assignments for Projects on Private Property.**

Programs/Activities		Districts	CEQA Unit
<i>CEQA Responsible Agency</i>			
Wells	New Drill	X	
	Rework/Deepen/Sidetrack	X	
	Abandon/Re-abandon	X	
	Supplementary Notice*	As applicable	
	Geothermal**	X	
	UGS***Facility		X
	 UIC project	X	2 <sup>nd</sup> CEQA review
	WST		X
<i>CEQA Lead Agency</i>			
Wells	New Drill		X
	Rework/Deepen/Sidetrack		X
	Abandon/Re-abandon		X
	Supplementary Notice*		As applicable
	Geothermal**		X
	UIC project		X
	WST		X

\* See the Supplementary Permits section for instruction.

\*\* See Geothermal Section.

\*\*\* See UGS Section.

For NOI/Applications of activities on **federal lands or federal leases**, Table 3 identifies CEQA review assignments by programs and activities. In most instances, DOGGR will be the CEQA Lead Agency. Should there be any questions on specific split-estate situations, please contact the CEQA Unit.

**Table 3. CEQA Review Assignments for Projects on Federal Lands or Federal Leases.**

Programs/Activities		Districts	CEQA Unit
<i>CEQA Lead Agency</i>			
Wells	New Drill		<b>X</b>
	Rework/Deepen/Sidetrack		<b>X</b>
	Abandon/Re-abandon		<b>X</b>
	Supplementary Notice*		
UGS Well***		<b>X</b>	
UIC project			<b>X</b>
WST			<b>X</b>

\* See the Supplementary Permits for instruction.

\*\*\* See UGS Section.

# District CEQA Procedures

## Step 1. CEQA Documentation Completeness Review

This step checks: 1) that the CEQA information in WellSTAR is complete and the task assignment is appropriate; and 2) whether the document uploads are complete and sufficient to continue processing.

### Completeness Review

<b>Timing</b>	<p>The CEQA Completeness Review should be performed concurrently with the NOI/Application review when the task has been assigned. Where information or attachments are incomplete or in error, the operator should be contacted with specific instructions regarding the information or documents needed.</p> <p>The NOI/Application package can only be deemed complete, when both the NOI/Application and CEQA Information Step (WellSTAR) or Checklist (Geothermal) are complete and appropriate CEQA documentation has been provided.</p>
<b>Completeness Verification</b>	<p>Here is what to look for in the CEQA Completeness review in WellSTAR.</p> <p><b>Did the Local Agency prepare an Environmental Document for this project?</b></p> <p>One of the choices for “Did the Local Agency prepare an Environmental Document for this project?”, Yes or No, needs to be checked. Note that Local Agency <b>does not</b> include a Federal Agency such as the U.S. Bureau of Land Management (BLM), but <b>does</b> include State Agencies such as the State Lands Commission (SLC) and local cities and counties.</p> <ul style="list-style-type: none"><li>➤ If <b>Yes</b> is selected;</li><li>➤ 1) one of the two radio buttons below the Yes response should be checked;</li></ul> <div><p>Did the Local Agency prepare an Environmental Document for this project? ⓘ *</p><p>Yes ▼</p><p>If the Local Agency prepared an environmental document for this project, please indicate which of the following applies: *</p><p><input checked="" type="radio"/> Permit was issued, and an environmental document was prepared for this project</p><p><input type="radio"/> Permit was issued, and the project is within scope of a prior environmental document</p></div> <ul style="list-style-type: none"><li>➤ 2) if the top radio button is checked (Permit was issued, and an environmental document was prepared for this project), then the Document Upload step should include a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report and any supplemental, subsequent, or addendum documents related to them;</li></ul>

Did the Local Agency prepare an Environmental Document for this project? ⓘ \*

Yes ▼

If the Local Agency prepared an environmental document for this project, please indicate which of the following applies: \*

- ☐ Permit was issued, and an environmental document was prepared for this project
- ☒ Permit was issued, and the project is within scope of a prior environmental document

- 3) if the bottom radio button is checked (Permit was issued, and the project is within scope of a prior environmental document) the Document Upload step should include the prior environmental document (ND, MND, or EIR). See **Additional Submittals** (below) for more documents to look for.

- If **No** is selected as a response to, “Did the Local Agency prepare an Environmental Document for this project?”, indicating a CEQA document was not prepared, alternate radio buttons appear asking if the local agency determined the project exempt.

If the local agency determined the project exempt, a Resolution approved by the local agency recognizing the exemption or a Notice of Exemption (NOE) filed with the County Clerk, must be uploaded in the Document Upload step. The radio button titled “Yes, this project was exempt” should be selected, as shown below:

Did the Local Agency prepare an Environmental Document for this project? ⓘ \*

No ▼

If the Local Agency did not prepare an environmental document for this project, please indicate if this project was exempt: \*

- ☒ Yes, this project was exempt
- ☐ No, this project was not exempt

Please indicate if a permit was issued: \*

- ☒ Permit was issued, but no environmental document was prepared for this project
- ☐ No permit was issued/Permit is not required

- If the local agency did not file an NOE or prepare a Resolution, “No, this project was not exempt” must be selected.

If the local agency issues ministerial permits, then “Permit was issued, but no environmental document was prepared for this project” must be selected.

If the local agency does not participate in permitting activities for oil, gas, or geothermal activities then, “No Permit was issued/Permit is not required” bottom radio button must be selected, indicating that the local agency has not taken part in issuing any permits nor creating any CEQA documents or notices for the proposed use.



Did the Local Agency prepare an Environmental Document for this project? ⓘ \*

No ▼

If the Local Agency did not prepare an environmental document for this project, please indicate if this project was exempt: \*

- ☐ Yes, this project was exempt  
☒ No, this project was not exempt

Please indicate if a permit was issued: \*

- ☐ Permit was issued, but no environmental document was prepared for this project  
☒ No permit was issued/Permit is not required

### Is there a CEQA Lead Agency?

- **Yes**, should be checked if the previous response to, “Did the Local Agency Prepare an Environmental Document for this project?” was “Yes”.

Is there a CEQA Lead Agency? (other than DOGGR) ⓘ \*

- ☒ Yes ☐ No

When “Yes” is checked a box opens titled “CEQA Lead Agency”. All required fields within the CEQA Lead Agency box must be filled in with appropriate information and all checked documents must be present in the Document Uploads tab. The CEQA Lead Agency must not be DOGGR.

See the CEQA Lead Agency box below...

### CEQA Lead Agency ▼

CEQA Lead Agency \*

CEQA Lead Agency Contact \*

CEQA Lead Agency Address \*

Address Line 2

City \*

State \*

Zip Code \*

Phone Number \*

Phone Number Extension (Ext)

Email Address \*

CEQA Documentation ⓘ

- |   |  |
|---|--|
| <input type="checkbox"/> Negative Declaration           | <input type="checkbox"/> Supplemental        |
| <input type="checkbox"/> Mitigated Negative Declaration | <input type="checkbox"/> Addendum            |
| <input type="checkbox"/> Environmental Impact Report    | <input type="checkbox"/> Substitute Document |
| <input type="checkbox"/> Subsequent                     |  |

Project Title

Project Scope ⓘ \*

Date EIR Certified or ND/MND Adopted \*



State Clearinghouse Number

CEQA Notice Type \*

For projects in unincorporated Kern County the CEQA Documentation “EIR” box should be checked; the Project Title should be “Revisions to the Kern County Zoning Ordinance – 2015 (C), Focus on Oil and Gas Local Permitting; the Date EIR Certified is November 9, 2015; the SCH # is 2013081079; and the CEQA Notice Type is “NOD”. The operator can gather other necessary information from the Kern County Planning and Natural

Resources Department website or use the Kern County CEQA Operator Checklist on the [DOGGR CEQA webpage](#).

- **No**, should be checked if the previous response to, “Did the Local Agency Prepare an Environmental Document for this project?” was “No”. When “No” is checked a box opens titled “Local Agency”. As explained in the introduction of the CEQA Information page, “the Operator must first verify whether or not CEQA compliance is required by the local agency before submitting the NOI to DOGGR...”, showing that they have made contact with the local agency. All required information in this box should be provided. Citations of local ordinances in lieu of contacting the local agency is not acceptable.

Is there a CEQA Lead Agency? (Other than DOGGR) ⓘ \*

☐ Yes ☒ No

Local Agency ▼

Local Agency Name \*

Local Agency Contact Name \*

CEQA Documentation \*

☐ Exempt ☐ None Available

- If the project was determined exempt, and there is evidence of the exemption in Document Upload, the Exempt radio button must be checked. Once chosen, additional fields appear that request the State Clearinghouse Number (SCH) if filed with the SCH (optional) and the notice type: Local Resolution or Notice of Exemption.

CEQA Documentation \*

☒ Exempt ☐ None Available

State Clearinghouse Number

CEQA Notice Type \*

- If there is no CEQA documentation available, additional contact information from the local agency is requested in fields in the box (shown below). The purpose of this section is to make sure that operators have open dialogue with local agencies, and that they check out all permit requirements prior to applying for permits with DOGGR.

**CEQA Documentation \***

☐ Exempt ☒ None Available

**Local Agency Contact Date \***

**Phone Number \***

**Phone Number Extension (Ext.)**

**Email \***

**Federal Land** - If the project is completely located on federal land, the operator should enter NA in all the field boxes, all zeros in the phone number field, and NA@NA.gov in the email field. The current date should be entered. **This only applies to projects on federal land.** If the boxes are fill out this way and the land is located on private or state land, the form is incorrect and must be sent back to the operator.

The most recent NTO for CEQA Compliance warns that operators that intentionally submit false information may be subject to an enforcement action.

### Is there a NEPA Lead Agency?

- If a project is fully or partially located on federal land, **Yes** must be checked.
- A box opens called NEPA Lead Agency. All required fields within the NEPA Lead Agency box must be filled in with appropriate information, which can be found on the NEPA documents uploaded in Document Upload.
- If there are no uploaded document(s) or the information is incomplete, the application should be sent back to the operator.
- If there is no federal land, **No** must be checked. If “No” is checked, nothing appears, and the operator can go on to the next question.

## NEPA Lead Agency

NEPA Lead Agency \*

NEPA Lead Agency Contact

NEPA Lead Agency Address \*

Address Line 2

City \*

State \*

Zip Code \*


Phone Number \*

Phone Number Extension (Ext.)

Email Address \*

NEPA Documentation \*

☐ Categorical Exclusion

☐ Environmental  
Assessment/FONSI/DNA 

☐ Sundry Notice

☐ Environmental Impact Statement

Project Title

NEPA Project Number

Date of Decision Record/Record of Decision



Publication Date



Federal Register Notice Number

## Please Indicate the surface ownership | Please Indicate the mineral ownership

- The check boxes indicating the surface ownership and mineral ownership should be appropriately checked. If NEPA Lead Agency information is provided above, then the surface ownership should be Federal or Tribal. If State or Federal is checked, a box opens to add the agency name.

### Please indicate the surface ownership ⓘ \*

☒ Private ☐ State ☐ Federal ☐ Tribal

### Please indicate the mineral ownership ⓘ \*

☒ Private ☐ State ☐ Federal ☐ Tribal

## Project Description

- The Project Description section can be completed using the information box or by providing a document in the Document Upload section.

All Project Descriptions must include four key components: 1) Project proposal; 2) Project Location; 3) Environmental Setting; 4) Local Agency Requirements.

The right corner of the box can be pulled down to make more room to view text.

### CEQA Project Description \*

Please enter a CEQA Project description in the box below. You may also upload it as an attachment on the Document Upload Step, but please indicate that in the textbox below. Please include:

- Project Proposal
- Project Location
- Environmental Setting
- Local Agency Requirements
- If this project description applies to multiple wells, please include a list of all wells (include API # and Well Name/Designation, if known).
- Additional guidance on how to write a CEQA Project Description can be found on the DOGGR CEQA homepage

Project Name: PUMPJACK 3759H

Applicant Name: Pumpjack Energy, LLC

Project Proposal: Pumpjack Energy, LLC (Pumpjack) proposes to drill a new well (3759H) in the Sunrise oilfield to continue resource development. The new well will be located on an existing well pad with an existing access road. The well pad can accommodate the drill rig, staging of materials, other equipment, and worker parking. Drilling is expected to require approximately 15 days to reach target depth. The well will be tested to determine if it will be placed into production or plugged and abandoned. A production rig would be used to complete the well and prepare the well for production testing.

Project Location: The proposed project is located in Kings County. The 4 existing wells, as described above, are all situated on one single pad, located in the pre-April 5, 1973 field boundaries

Environmental Setting: The surrounding land use within a 3-mile radius of the proposed project consists of densely developed oil & gas fields.

Local Agency Requirements: The project is located in an agricultural zone in Kings County. Oil and gas activities are considered compatible to the zoning. No permits are issued by Kings County.

<b>Additional Submittals</b>	<p><b>If the response to the first question is Yes, indicating a Local Agency prepared an Environmental Document for this project,</b> then the following submittals must be provided in the Document Uploads tab, depending on the project location.</p> <p><b>In Unincorporated Kern County:</b></p> <ul style="list-style-type: none"> <li>• Approved local permit (Kern County Job Card)</li> </ul> <p><b>All Other Cities or Counties:</b></p> <ul style="list-style-type: none"> <li>• Approved local permit, and</li> <li>• Final CEQA environmental document (ND, MND, or EIR) <u>and</u></li> <li>• Notice of Determination (NOD)</li> </ul> <p><b>If the response to the first question is No, indicating the Local Agency did not prepare an Environmental Document for this project,</b> and there is a NEPA Lead Agency, the following submittals must be provided in the Document Uploads tab.</p> <p><b>For new wells:</b></p> <ul style="list-style-type: none"> <li>• BLM APD, FONSI (or DNA) and Decision Record</li> </ul> <p><b>For all other NOIs:</b></p> <ul style="list-style-type: none"> <li>• BLM APD or Sundry Notice</li> </ul>
<b>Completeness Verification</b>	<p>Once the NOI/Application and CEQA Information have passed the completeness review, the Completeness Verification can be approved.</p> <p>CEQA Information Step responses will be used by WellSTAR to assign tasks to either a District CEQA Review Workgroup or the CEQA Headquarters Review Workgroup as shown in Tables 2 and 3. The Completeness Step reviewer should assign CEQA Headquarters Review Workgroup tasks according to Table 4.</p>

**Table 4. CEQA Headquarters Review Workgroup Task Assignments**

	<b>Workgroup:</b>	<b>Assignment Criteria</b>	
	<b>CEQA Headquarters Review CEQA Unit Staff</b>	<b>District NOI *</b>	<b>Program WST, UIC, UGS</b>
<b>Assign to:</b>	<b>Jan Perez</b>	Northern	WST
	<b>Larry Kleinecke</b>	Inland	
	<b>Meri Meraz</b>	Southern	UIC
	<b>Tharon Wright</b>	Coastal	UGS
	Cathi Slaminski, Supervisor		
	Elmin Leung, Support		

\* **NOI** (O&G activity) = new drill, re-drill, sidetrack, rework, deepen, abandon, and/or re-abandon for all programs

+ **CEQA District Review** workgroups = 'CEQA Southern Review'; 'CEQA Inland Review'; 'CEQA Northern Review'; 'CEQA Coastal Review'

## Step 2. CEQA Responsible Agency Qualitative Review

WellSTAR Responsible Agency review tasks will be assigned to District CEQA Workgroups based on the answers in the CEQA Information Step and approval of the CEQA Completeness Review.

In this review, District staff will conduct a qualitative review of the uploaded CEQA documents and Project Description, confirm the WellSTAR information and DOGGR's CEQA role as Responsible Agency, prepare a CEQA RA Review form for new wells, and approve the CEQA Review in WellSTAR.

**Districts are allowed to modify answers in the CEQA Information Step if they determine there are minor errors that can be corrected prior to approval. If information entered is incorrect or inaccurate, District CEQA reviewers should place the CEQA review task On Hold and contact the operator to correct those errors.**

### Qualitative Review

The CEQA qualitative review is a comprehensive review of the information provided in the WellSTAR CEQA step and the documents provided by the operator. The findings of the qualitative review should confirm DOGGR's reliance on lead agency documents and findings to complete our CEQA review.

<b>Permit was issued, and an environmental document was prepared for this project</b>	<p>The Document Uploads tab should include a local permit and CEQA document(s). Review the documents to confirm:</p> <ol style="list-style-type: none"><li>1. The CEQA documents comprise a ND, MND, or EIR prepared specifically for the project. A CUP is not a CEQA document but may include one as an attachment.</li><li>2. A SCH # and NOD is provided.</li><li>3. The CEQA documents (ND, MND, or EIR) include references to the activities DOGGR is permitting. Note that "well maintenance" or "operation" can refer to most rework activities. However, a MND for well installation does not apply to well abandonment activities unless those activities are specifically mentioned.</li></ol>
<b>Permit was issued, and the project is within the scope of a prior environmental document</b>	<p>If the project is in unincorporated Kern County, the Document Upload folder should include a Kern County Job Card. No other environmental documents are required.</p> <p>For all other locations, the Document Uploads tab should include a local (or SLC) permit and appropriate CEQA document(s). Review the documents to confirm:</p> <ol style="list-style-type: none"><li>1. The CEQA documents comprise a ND, MND, or EIR for the project location and wells. A CUP is not a CEQA document but may include one as an attachment. Local ordinances are not CEQA documents.</li><li>2. A SCH # and NOD is provided.</li><li>3. The CEQA documents (ND, MND, or EIR) include references to the activities DOGGR is permitting. Note that "well maintenance" or "operation" can refer to most rework activities. However, a MND for well installation does not apply to well abandonment activities unless those activities are specifically mentioned.</li></ol>
<b>Is there a CEQA Lead Agency (other than DOGGR)</b>	<p>The response should be checked "Yes"</p> <p>When Yes is checked a box opens called CEQA Lead Agency. Review the required fields to confirm the lead agency is the same as the</p>



	<p>CEQA document lead agency. DOGGR should never be listed as the Lead Agency.</p> <p>In unincorporated Kern County, the CEQA Lead Agency information should match the Kern County Job Card.</p>
<b>Is there a NEPA Lead Agency</b>	<p>The response should be checked “No”. NEPA Lead Agency reviews are conducted by the CEQA Unit Workgroup.</p> <p>In the case of private surface ownership and federal mineral ownership, the environmental review is conducted by the agency responsible for the surface. A NEPA review should not have been performed by BLM.</p>
<b>Please Indicate the surface/mineral ownership</b>	<p>The surface ownership should always be “private” or “state”</p> <p>The mineral ownership can be any of the available responses.</p>
<b>Project Description</b>	<p>The Project Description should briefly describe the project surface activities. The <a href="#">CEQA Guidance for Operators: Project Description document</a> describes the information that should be included, and provides examples. The document is provided on the DOGGR CEQA webpage and on the <a href="#">DOC Insider CEQA webpage</a> for District reference.</p>

## Confirm DOGGR’s CEQA Agency Role

### If the operator:

- 1) Selects YES to the local agency as having prepared an environmental document;
- 2) submits an adopted or approved environmental document that addresses the work to be performed under the NOI;
- 3) provides the required lead agency information; and
- 4) provides a suitable Project Description;

**Then** DOGGR’s CEQA role as Responsible Agency is confirmed, and the CEQA portion of the completeness check can be approved in WellSTAR.

If after working with the operator, they cannot produce an approved or certified environmental document (ND, MND, EIR) and filed NOD, contact the CEQA Unit. The CEQA Task may need to be reassigned to someone in the CEQA Unit.

### Step 3. CEQA Responsible Agency Review

Once the Qualitative Review is complete and DOGGR's CEQA Responsible Agency role is confirmed, and the project is for NOIs for reworks, re-drills and abandonments, or re-abandonments, no further CEQA review is required and can be considered complete. This is because DOGGR regulations (CCR 14 §1684 – §1684.2) have determined that they are exempt under CEQA.

For new drills and RA Applications for injection Approval (UIC), the District conducts a formal CEQA review as the Responsible Agency.

A CEQA Responsible Agency (RA) review consists of:

- 1) Completing a Responsible Agency Review (CEQA RA Review form),
- 2) Drafting a Notice of Determination (NOD),
- 3) If the NOI/Application is approved, then inserting the approval date of the permit in the NOD and filing it with the State Clearinghouse.

<b>Unincorporated Kern County</b>	<p>DOGGR is <b>always</b> the CEQA Responsible Agency for oil and gas projects on private land in unincorporated Kern County. DOGGR already knows Kern County is the Lead Agency and has a copy of the Kern County EIR.</p> <p>For all Kern County NOIs for new wells, District staff will prepare a Kern County specific RA Review and file a NOD.</p> <p>See the CEQA Responsible Agency Review section below for procedures.</p>
<b>Other Cities and Counties</b>	<p>In other cities and counties, District staff will conduct CEQA reviews when DOGGR is the Responsible Agency.</p> <p>For new wells, District staff will compare the project description in the Lead Agency's environmental document to the operator's proposed activity in the NOI(s) and decide if it is a reasonable match. Contact the CEQA Unit for assistance if it is unclear. If it is a reasonable match, continue to prepare a CEQA RA Review form and file a NOD.</p> <p>See the CEQA Responsible Agency Review section below for procedures.</p>
<b>BLM Lands</b>	<p>In locations where the federal government owns both surface and minerals rights, DOGGR is always the Lead Agency. In this situation, the CEQA Unit Workgroup will conduct the CEQA review.</p> <p>In cases of a split estate, where the federal government owns the mineral rights and a private party owns the surface, it would be treated the same way as O&amp;G activities on other private property discussed above and in Table 1.</p>

### One CEQA Review for Multiple NOIs and Project Activity Titles

A single CEQA review can cover multiple NOI permits as long as the activities are related. To group NOI's under one CEQA review, they should be the same type of activity (e.g., new drill), located in the same field, submitted by the same operator, and will be permits that are approved at the same time.

When multiple NOIs are grouped under a single CEQA review, a Project Activity Title must be created and used for the Responsible Agency Review (RA Review) form, Notice of Determination (NOD), and web posting of the CEQA review.

The CEQA Unit has developed the following pattern to create Project Activity Titles for CEQA reviews of single and multiple wells (Table 5). DOGGR Districts and the CEQA Unit will consistently follow these project activity title patterns.

1 well NOI – Program Abbreviation + Operator name + API#

Multiple well NOI – Program Abbreviation + Operator name + # of wells + date of RA Review start

**Table 5. Example Project Activity Titles by Program and Type**

Program	Type	Project Activity Title Example
<b>Oil &amp; Gas</b>	Single Well	OG Aera 0403062751
	Multiple Wells	OG Aera 5 Wells 10022018
<b>Geothermal</b>	Project Application	GEO Geysers XXXXXXXX (use GEO project name or code)
	Single Well Multiple Wells	GEO Geysers 0403062543 GEO Geysers 3 wells 10022018
<b>UGS</b>	Project Application	UGS Chevron 05000231
	Single Well Multiple Wells	UGS SoCalGas 0403062751 UGS SoCalGas 3 wells 10022018
<b>UIC</b>	Project Application	UIC Olsen 05000231
	Single Well Multiple Wells	UIC Olsen 0403062751 UIC Olsen 3 wells 10022018
<b>WST</b>	Single Well	WST Chevron 0403062751
	Multiple Wells	WST Chevron 042-0053 (use WST batch number)

## CEQA Responsible Agency Review Procedures

The CEQA RA Review form is a PDF fillable template. It has been designed to meet CEQA administrative record requirements as they pertain to environmental impacts of oil, gas, and geothermal activities permitted by DOGGR.

There are two versions of the CEQA RA Review form template: 1) one for activities located in unincorporated Kern County that has been pre-filled with information on the Kern County EIR and 2) one for all other counties and cities in the state and requires the local environmental document information to be filled in. Both forms can be found on the [DOC Insider CEQA webpage](#).

The **administrative record** is the set of documents that memorializes a decision on a discretionary permit or approval letter. Instructions related to the administrative record are included on the last page of the RA Review form.

<p><b>Completing the RA Review Form</b></p>	<p><b>Section I – Project Information.</b></p> <p>Complete all information applicable. Most of this information is available on the Checklist, associated submittals, and NOI. See the discussion about Project Activity Title at the beginning of Step 3.</p>
	<p><b>Section II – Lead Agency Environmental Document.</b></p> <p>In the Kern County version of the CEQA RA Review Form, Kern County EIR information is already pre-filled. Check the appropriate box as it relates to scope (type of activity).</p> <p>For example:</p> <p>For all well work NOIs, including injection wells, check O&amp;G.</p> <p>For all other counties/cities, complete this section as directed on the form</p>
	<p><b>Section III – Impact Analysis</b></p> <p><b>Project Description</b></p> <p>The operator submitted project description should briefly describe all significant activities associated with the project. Use the Operator Guidance: Project Description to get a sense of the content.</p> <p>Generally, descriptions for rework/abandonment can be very brief. If the project description is not adequate, request an updated description from the operator.</p> <p><b>Scope of Project Activity</b></p> <p>Review of the local agency CEQA document for the scope of project activity should not take long. If the document is being viewed electronically, use key words in the <i>find in page</i> feature to speed up the process. If you come across any difficulty with this step, please contact the CEQA Unit for assistance.</p> <p><u>Kern County</u></p> <p>The Kern County RA Review Form is available pre-populated with Kern County EIR information. Follow the instructions on the form.</p> <p><u>Other Counties/Cities</u></p> <p>Review the CEQA document project description, or executive summary for consistency with the activities proposed in the application for permit or approval letter, and/or the operator’s project description. Sometimes the specific project activities are fully referenced in the CEQA document’s project description or executive summary. Other times they are in a different section of the CEQA document or better defined in a different section of the document. The project description should include a location reference for the project activities in the CEQA document. Regardless of where they are located, if they cover the activities proposed in the application for permit or approval letter and/or the operator’s project description, mark Yes. If not, mark No. Follow the instructions on the form under each option as marked.</p>
	<p><b>Section IV – Additional Impacts</b></p> <p>This section identifies whether additional significant impacts beyond those in the Lead Agency CEQA document are present. An example of an additional impact is a Critical Well with clear documentation of proposed</p>

	<p>impacts listed in the applicant/operator's project description that are not addressed in the Lead Agency document.</p> <p>Note that the additional impacts require substantial evidence and cannot have been addressed in the Lead Agency document or as permit conditions.</p> <p><u>Kern County</u></p> <p>No Additional Impacts are anticipated for activities related to District Responsible Agency Reviews.</p> <p><u>Other Counties/Cities</u></p> <p><b>Additional impacts are very rare and require a review of the evidence with the local agency.</b> If Additional Impacts are identified, contact the CEQA Unit in Headquarters as instructed on the CEQA RA Review form. The CEQA Unit will assess the possible additional impacts and respond back to the project engineer when finished. The permit should be placed on hold until this issue is resolved.</p>
	<p><b>Section V – Mitigation Review</b></p> <p>This section addresses DOGGR's consideration of the environmental impacts in the Lead Agency's CEQA document.</p> <p><u>Kern County</u></p> <p>No need to change check boxes in this section.</p> <p><u>Other Counties/Cities</u></p> <p>If a Lead Agency's Mitigation Monitoring and Reporting Program was submitted, then check Yes. Check No for 'Additional Mitigation Measures Required?', unless directed otherwise by the CEQA Unit.</p> <p>Note: 'Additional Mitigation Measures' in this Section refers to those specifically developed to mitigate potentially significant impacts determined by the CEQA Unit under 'Additional Impacts.'</p>
	<p><b>Section VI - Review Conclusions</b> summarizes the review conclusions and reviewer's information, respectively. This section is dependent upon whether additional instructions given by the CEQA Unit relative to previous sections. Additional boxes in this section are there for the CEQA Unit to check during Additional Impacts review situations.</p> <p>In most cases the findings by the Lead Agency will be accepted and no additional mitigation measures are required.</p>
	<p><b>Section VII - Review Completed</b></p> <p>A typed signature of the project engineer and date of completion of the CEQA RA Review form is required.</p>
<b>Save RA Review Form</b>	<p>Save the completed RA Review form in a project folder.</p>

## Step 4. CEQA Review Complete / Permit or Project Approval

The CEQA review is complete once the CEQA RA Review has been approved. The CEQA RA Review form should be saved in the project file, not in WellSTAR. In WellSTAR, the CEQA task can now be approved.

If the District approves the NOI/Application, then a **Notice of Determination** needs to be completed with the date of permit/PAL issuance, the same Project Activity Title, and other relevant information.

## Step 5. Prepare and File Notice

<b>Notice of Determination</b>	<p>The District will prepare a Notice of Determination (NOD) for each Responsible Agency review. The NOD must be filed with the State Clearinghouse within five working days after permit issue to be valid.</p> <p>The NOD template is provided as a PDF fillable form in two versions. One for Kern County, which has been pre-filled with Kern County EIR information, and a second for other Counties/Cities, which requires the environmental document information to be filled in.</p> <p>Use the same Project Activity Title in the NOD as was used in the RA Review Form.</p> <p>Print the NOD template, either as a PDF document or hard copy, to remove the fillable template boxes prior to filing with the State Clearinghouse. Be sure to sign and date the Notice before filing.</p>						
<b>Filing Notices with State Clearinghouse</b>	<p>Notices must be received by the Clearinghouse <u>within five working days after the District signs the permit or other approval</u> for the NOD to be valid.</p> <p>Emailed NODs may no longer be accepted by the State Clearinghouse (SCH) after October 2019. However, electronic filing of notices can now be performed by personnel trained and authorized by SCH. Details of electronic filing procedures are not included in this document.</p> <p>The following website has document submission details for reference: <a href="http://www.opr.ca.gov/clearinghouse/ceqa/document-submission.html">http://www.opr.ca.gov/clearinghouse/ceqa/document-submission.html</a></p> <p style="text-align: center;"><b>-- Or --</b></p> <p>Notices can also be filed by mail. If sending by mail, send two signed originals to the Clearinghouse. The Clearinghouse will date-stamp both and return one to you.</p> <p><b>Send the signed NOD via:</b></p> <table><tr><td><b>USPS</b></td><td></td><td><b>Courier Service / Hand Delivery</b></td></tr><tr><td>State Clearinghouse P.O. Box 3044 Sacramento, CA 95812-3044</td><td><b>OR</b></td><td>State Clearinghouse 1400 Tenth Street Sacramento, CA 95814</td></tr></table>	<b>USPS</b>		<b>Courier Service / Hand Delivery</b>	State Clearinghouse P.O. Box 3044 Sacramento, CA 95812-3044	<b>OR</b>	State Clearinghouse 1400 Tenth Street Sacramento, CA 95814
<b>USPS</b>		<b>Courier Service / Hand Delivery</b>					
State Clearinghouse P.O. Box 3044 Sacramento, CA 95812-3044	<b>OR</b>	State Clearinghouse 1400 Tenth Street Sacramento, CA 95814					

<b>Post Notice to CEQA Website</b>	<p>After filing the NOD with the SCH, ask the DOGGR Webmaster to post it to the DOGGR CEQA project website.</p> <p>For reference the DOGGR CEQA Project URL is <a href="http://www.conservation.ca.gov/dog/CEQA/Pages/CEQANotices.aspx">http://www.conservation.ca.gov/dog/CEQA/Pages/CEQANotices.aspx</a></p> <p>Be sure to attach the signed NOD in your email request to the DOGGR Webmaster.</p> <p>Sample email to request posting of a notice to the CEQA website.</p> <p>From: Project engineer  Sent: Date  To: doggrwebmaster@conservation.ca.gov  Cc: Supervisor/Sr. Staff who should be notified that the notice was posted  Subject: Please post notice to DOGGR's CEQA project webpage  Attached: NOD OG Aera 0403062751.pdf</p> <p>DOGGR Webmaster:</p> <p>Please post the following notice and attached NOD to DOGGR's CEQA Project webpage.</p> <p>OG Aera 0403062751  Aera Energy, LLC  Sec 33, Township 28S, Range 21E MD B&amp;M  Kern County  (Posted Aug 4, 2018)  Notice of Determination*</p>
<b>Save Notice</b>	<p>Save a signed copy of the NOD in the project files and WellSTAR well file.</p>

## **Step 6. Administrative Record**

The administrative record is the set of documents that memorializes the decision on a discretionary permit or approval letter.

When a permit is issued, the following documents should be included in the project folder or WellSTAR file associated with the permit:

- Project Description
- CEQA environmental document(s), if applicable
- NEPA environmental document(s), if applicable
- CEQA RA Review Form (project folder only)
- Filed Notice of Determination



# Other Projects and Programs

## Federal Projects

<b>Federal Projects Completeness Review</b>	<p>When a NOI is for a location with surface rights only or mineral and surface rights owned by a Federal agency, the operator will submit a Project Description, along with either: National Environmental Policy Act (NEPA) documents including a NEPA Environmental Assessment (EA), Finding of No Significant Impact (FONSI) or Determination of NEPA Adequacy (DNA), and a Decision Record; <b>or</b> a Sundry Notice.</p> <p>It is important to point out here that a Sundry Notice is not a NEPA document. It is the federal equivalent of a permit that is issued for oil and gas activities such as rework, or abandonment, or supplementary drilling when NEPA documents are not required.</p>
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# Geothermal

Development of a geothermal field is divided into two phases: resource confirmation (exploratory) and resource development (field development). DOGGR is the CEQA Lead Agency for all exploratory projects, unless a project is in Imperial County<sup>1</sup> (Table 6). For field development projects, the local agency (city/county) will be the Lead Agency, unless the proposed project is 50 Mega Watts (MW) or larger, in which case the California Energy Commission (CEC) will be the Lead Agency.

**Table 6. CEQA Review Assignments for Geothermal Projects**

Scale/Activities	Responsible Agency	Lead Agency
<b>Exploratory or Other Geothermal Project</b>		
Geothermal Project Application	Districts	CEQA Unit
New Drill	Districts	CEQA Unit
Supplementary/Rework	Districts	CEQA Unit
Abandon	Districts	CEQA Unit
<b>Imperial County Exploratory <sup>1</sup></b>		
New Drill	Districts	NA
Supplementary/Rework	Districts	NA
Abandon	Districts	NA
<b>Field Development <sup>2</sup></b>		
New Drill	Districts	NA
Supplementary/Rework	Districts	NA
Abandon	Districts	NA

<sup>1</sup> DOGGR gives approval to Imperial County to act as Lead Agency for exploratory projects in unincorporated Imperial County. When Imperial County sends a CEQA document for exploratory or field development projects to the Southern District for review, DOGGR will act as Commenting Agency.

The adopted/certified (final) CEQA document prepared by Imperial County will be relied upon when DOGGR is a responsible agency, prior to issuing permits.

<sup>2</sup> If the project is 49.9MW or smaller the local lead agency will conduct a CEQA review for the field development project. If the project is 50MW or larger, the CEC becomes the Lead Agency and prepares the substitute (CEQA equivalent) documents for the project. DOGGR will be the Responsible Agency in either scenario and rely on the local lead agency CEQA document or the CEC's substitute document when conducting its CEQA review.

\* If there is a scenario that doesn't fit what is described above, contact the CEQA Unit for assistance.

## GEOTHERMAL

### Completeness Review

<b>Timing</b>	<p>Checklist and NOI/Application are reviewed for completeness at the same time. Where information or attachments for the Checklist are incomplete, the Checklist should be returned to the operator for completion.</p> <p>The NOI/Application package can only be deemed complete, when both the NOI/Application and Checklist are complete and appropriate documents are provided.</p>
<b>Completeness Review</b>	<p>Here is what to look for in the CEQA Operator Checklist.</p> <p><b>Section I</b> – basic operator info.</p> <p><b>Section II</b> – responses here should match the geothermal project on the NOI/Application submitted with the Checklist.</p> <p><b>Section III</b> – one of the choices, Yes or No, needs to be checked.</p> <ul style="list-style-type: none"> <li>▪ If YES is checked: <ul style="list-style-type: none"> <li>○ CEQA Lead Agency should be filled out and</li> <li>○ Environmental Review Documentation for CEQA Project should be filled out.</li> <li>○ <i>See Additional Submittals (below) for documentation list</i></li> </ul> </li> <li>▪ If BOTH NO and EXEMPT are checked: <ul style="list-style-type: none"> <li>○ Evidence of conversation can be left blank</li> <li>○ CEQA Lead Agency should be left blank</li> <li>○ Environmental Review Documentation <ul style="list-style-type: none"> <li>▪ CEQA Documentation, exempt box should be checked</li> <li>▪ If a Notice of Exemption (NOE) is submitted, NOE box should also be checked.</li> <li>▪ <i>See Additional Submittals (below) for documentation list</i></li> </ul> </li> </ul> </li> <li>▪ If NO is checked and EXEMPT IS NOT CHECKED: <ul style="list-style-type: none"> <li>○ Then evidence of conversation should be filled out</li> <li>○ No Environmental Review Documentation should be checked, and</li> <li>○ The CEQA Operator Checklist and any associated documents should be sent to the CEQA Unit.</li> </ul> </li> </ul> <p><b>Section IV</b></p> <ul style="list-style-type: none"> <li>▪ A <ul style="list-style-type: none"> <li>○ #1 &amp; #3 must be included. Beginning Oct 28, 2019 the indemnity agreement is only requested on a cases by case basis and not with every permit.</li> </ul> </li> <li>▪ B <ul style="list-style-type: none"> <li>○ If YES was marked in Section III, #4-6 should be filled out</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>▪ there should be PDFs or URLs to indicate submittals provided with the Checklist</li> <li>▪ Operator should list page numbers of where to find information in #5</li> <li>○ If YES was marked in Section III and the CEC is the lead agency, #9 should be filled out.</li> </ul> <p><b>Section V</b> is the project description, which has been incorporated into the latest revision of the CEQA Operator Checklist. The project description should follow the instructions and examples provided in the CEQA Guidance for Operators: <a href="#">Project Description</a>, available on the <a href="#">DOGGR CEQA webpage</a>.</p> <p><b>Section VI</b> is a list of wells intended to be included in the CEQA Operator Checklist. The information provided in the prior sections of the checklist should be applicable to all of the wells listed.</p>
<b>Additional Submittals</b>	<p>If YES is checked in Section III, then the following submittals should also be attached, depending on the project's size and location:</p> <p><b>If the project is Exploratory</b></p> <ul style="list-style-type: none"> <li>▪ No documentation is expected. DOGGR will be the lead agency</li> </ul> <p><b>If the project is a proposed geothermal facility larger than 50MW</b></p> <ul style="list-style-type: none"> <li>▪ URL or PDF of the CEC Substitute Documents</li> <li>▪ Project Description</li> </ul> <p><b>In Unincorporated Imperial County, 49.9MW and smaller</b></p> <ul style="list-style-type: none"> <li>▪ Approved local permit</li> <li>▪ Environmental document and NOD</li> </ul> <p><b>All Other Cities or Counties, 49.9MW and smaller</b></p> <ul style="list-style-type: none"> <li>▪ Approved local permit, and</li> <li>▪ CEQA environmental document and Notice of Determination (NOD)</li> </ul> <p><b>If BOTH NO and EXEMPT is checked in Section III:</b></p> <ul style="list-style-type: none"> <li>▪ The operator should have submitted a NOE as a part of their CEQA documentation</li> </ul>
<b>Save the Checklist and submittals</b>	<p>Once the NOI/Application and Checklist have passed the completeness review, the CEQA documents should be saved in and/or uploaded to the appropriate well or project file. For project files outside of WellSTAR, using a folder labeled 'CEQA'.</p>

## EXPLORATORY

### Project Approval - Geothermal Project Application

<b>Completeness Review</b>	For a geothermal project application, if Checklist Section II indicates: geothermal and exploratory, and the project is NOT located in Imperial County, forward to the CEQA Unit once both the Checklist and Application are found to be complete.
<b>DOGGR as Lead Agency</b>	<p>DOGGR is the Lead Agency for exploration of geothermal resources on State or private lands in California, except for Imperial County, which requested lead agency authority from DOGGR. Operators will submit a geothermal project application to DOGGR for approval to drill up to six exploratory wells to determine the geothermal resource potential. A CEQA review must be conducted and a CEQA document may be prepared for the exploratory activities.</p> <p>Per DOGGR regulations (CCR 14 §1682), specific data is collected for the geothermal project application. In addition to this data the CEQA Operator Checklist also requests information to conduct the CEQA review. Once the District determines this information as complete, a copy of the CEQA Operator Checklist and associated documentation should be sent to the CEQA Unit and a joint meeting with the Geothermal Project Engineer and Geothermal Program Manager should be scheduled as soon as possible. For any DOGGR geothermal Lead Agency projects, the CEQA Unit will conduct the CEQA review.</p> <p>The CEQA Unit will be in contact with the Project Engineer throughout the CEQA process. It is important for the Project Engineer carrying out the technical review and the CEQA Unit staff conducting the CEQA review to stay coordinated on any changes to the proposed project over the course of the process.</p> <p>Once the CEQA review is complete, the CEQA Unit will notify the Project Engineer that the Project Approval Letter (PAL) for the project application can be issued.</p> <p>The Geothermal Program Manager will decide whether to issue the PAL. Once the PAL is issued, the Project Engineer will notify the CEQA Unit that same day so that the required CEQA notice can be filed with the State Clearinghouse (SCH) in a timely manner.</p>
<b>Imperial County as Lead Agency</b>	<p>DOGGR regulations (CCR 14 §§1683.6 &amp; 1683.7) state that its Lead Agency responsibility may be delegated to a County. Imperial County is the only county to have authority granted to it by DOGGR to act as Lead Agency for exploratory geothermal projects. If a geothermal exploratory project is in unincorporated Imperial County, the County will act as the Lead Agency. They will prepare the appropriate environmental documents per CEQA and send them to DOGGR to review as the Commenting Agency.</p> <p>DOGGR will provide comments as necessary and rely on the final CEQA document prepared by Imperial County to conduct its CEQA review for exploratory NOI's prior to issuance. See instruction below for exploratory NOI's.</p>

<b>Joint CEQA NEPA Documents</b>	<p>Per the <a href="#">1979 MOU between DOGGR and the USGS</a> (Now managed by BLM):</p> <p>Geothermal resources not belonging to the Federal Government are under the jurisdiction of the respective local, County, or State agencies.</p> <ul style="list-style-type: none"> <li>▪ When drilling from Federal land into a non-Federal geothermal resource, DOGGR is responsible for permitting. The BLM is required to be consulted.</li> <li>▪ When drilling from private or State lands into a federal geothermal resource, BLM will permit the geothermal resource and consult with DOGGR. <ul style="list-style-type: none"> <li>○ There is a question whether in this situation DOGGR would still issue a permit. This will be reviewed on a case by case basis. Consult with the Geothermal Program Manager for guidance.</li> </ul> </li> <li>▪ Projects that include both Federal and non-Federal geothermal resources will require permitting by both the Federal government and DOGGR.</li> </ul> <p>For any geothermal project (applications/NOI's) that involve Federal land or resources, the CEQA Unit will conduct the CEQA review regardless of DOGGR is to act as Lead or Responsible agency.</p> <p>Once the District has completed <i>Step 1. CEQA Documentation Completeness Review</i>, a copy of the Checklist and associated documentation should be sent to the CEQA Unit and a joint meeting with the Geothermal Project Engineer should be scheduled as soon as possible. The meeting can be initiated by either the District or CEQA Unit.</p>
<b>Exploratory NOI's</b>	
<b>Completeness Review</b>	<p>If Checklist Section II indicates: geothermal, exploratory, and new drill or rework/supplementary or abandon, and the project is NOT located in Imperial County – forward to the CEQA Unit once both the Checklist and NOI are found to be complete.</p> <p>See DOGGR as Lead Agency below.</p> <p>If Checklist Section II indicates: geothermal, exploratory, and new drill or rework or abandon <b>and</b> the NOI is in Imperial County – forward to the District permit staff once both the Checklist and NOI are found to be complete.</p> <p>See DOGGR as Responsible Agency below.</p> <p>For any geothermal NOI's (regardless of the county) that involve Federal land or resources, the CEQA Unit will conduct the CEQA review regardless of DOGGR's lead or responsible agency role.</p>
<b>DOGGR as Lead Agency</b>	<p>If DOGGR is the Lead Agency for the geothermal project approval (issues a PAL), DOGGR will also be the Lead Agency for any exploratory NOI's associated with the project.<sup>1</sup></p> <p>NOIs are their own discretionary action under CEQA and will require their own CEQA review. The review will rely on and refer to the CEQA document prepared by DOGGR for the PAL. Because DOGGR is the Lead Agency the CEQA Unit will conduct the CEQA review for the exploratory NOIs.</p>

<sup>1</sup> CCR 14 § 15075(a)

	<p>Once the District has finished the completeness review for the NOI(s) and CEQA Operator Checklist, the CEQA Unit should be notified.</p> <p>The CEQA Unit will conduct the CEQA review concurrently with NOI review and notify the Geothermal Project Engineer when it is complete. Once the permits are issued the Project Engineer will notify the CEQA Unit that same day, so that the required CEQA notice can be filed with the State Clearinghouse (SCH) in a timely manner.</p>
<b>DOGGR as Responsible Agency</b>	<p>If Imperial County is the Lead Agency, DOGGR will rely on the County's CEQA document to conduct a Responsible Agency CEQA review for the NOI(s). Follow the procedures outlined in <i>Step 3. CEQA Reviews</i> to complete a Responsible Agency review.</p> <p>Project titles in District prepared RA Review forms and NODs for geothermal wells should follow the pattern explained in Table 5. Project Activity Titles by Program and Type.</p>
<b>Joint CEQA NEPA</b>	See instruction under Joint CEQA NEPA Documents above under Exploratory Project Approval.
<b>FIELD DEVELOPMENT</b>	
<b>Completeness Review</b>	<p>If Checklist Section II indicates: geothermal, development <b>and</b> Yes is checked in Section III – forward to the District staff once both the Checklist and Application are found to be complete.</p> <p>See Local Lead Agency below.</p> <p>If Checklist Section II indicates: geothermal, development <b>and</b> No is checked in Section III – forward to the CEQA Unit once both the Checklist and Application are found to be complete.</p> <p>See DOGGR as Lead Agency below.</p>
<b>Local Agency as Lead Agency (≤ 49.9 MW)</b>	<p>The local agency (city/county) is the Lead Agency for geothermal field development of a project, if the proposed facility will be generating less than 50MW. The local agency will prepare an environmental document that will cover the project in its entirety. It could be a specific environmental document prepared for a geothermal project or an EIR prepared for their General Plan that covers the Geothermal Resource Area.</p> <p>DOGGR will be the Responsible Agency for field development of a 49.9MW or smaller geothermal facility and will rely on the local Lead Agency's CEQA document for the CEQA review of any field development NOI's.</p> <p>See Field Development NOI's below.</p>
<b>DOGGR as Lead Agency (≤ 49.9 MW)</b>	<p>In the rare case that the local agency does not have an adequate environmental document for the proposed project, and/or does not intend to prepare one, DOGGR will become the Lead Agency.</p> <p>The CEQA Operator Checklist and the District Responsible Agency (RA) Review form are both designed to catch issues like this, if one arises. Following the review instructions for each form will direct the Project Engineer to include the CEQA Unit in the process, should this issue arise.</p> <p>See DOGGR as Lead Agency under NOI's below.</p>

<p><b>California Energy Commission as Lead Agency</b> <b>(≥ 50 MW)</b></p>	<p>For proposed geothermal facilities 50MW or greater, the California Energy Commission's (CEC) regulatory authority makes it the Lead Agency. The CEC has its own certified regulatory program. The regulatory program of a state agency is exempt from standard CEQA review sequence. Instead the CEC conducts its environmental analysis and prepares substitute document that is the functional equivalent of CEQA document.</p> <p>The CEC has exclusive jurisdiction, even on Federal lands.</p> <p>If an operator is required to submit an Application for a Certification to the CEC, DOGGR will be the Responsible Agency and the Districts will comment on the substitute documents prepared for the project, when the CEC makes them available. When the substitute document is finalized, local and State agencies will rely on the CEC's substitute documents when issuing their respective permits.</p> <p>DOGGR will rely on the CEC's substitute documents when conducting a Responsible Agency CEQA review for field development NOI's.</p> <p>See Field Development NOI's below.</p>
<p><b>Field Development NOI's</b></p>	
<p><b>Completeness Review</b></p>	<p>If Checklist Section II indicates: geothermal, development <b>and</b> YES in Section III – forward to the District staff once both the Checklist and NOI are found to be complete.</p> <p>See DOGGR as Responsible Agency below.</p> <p>If Checklist Section II indicates: geothermal, development <b>and</b> No in Section III – forward to the CEQA Unit once both the Checklist and NOI are found to be complete.</p> <p>See DOGGR as Lead Agency below.</p>
<p><b>DOGGR as Responsible Agency</b></p>	<p>If the local agency or CEC prepared the environmental document for field development, follow the procedures outlined in <i>Step 3. CEQA Review</i> to complete a Responsible Agency review.</p> <p>Project titles in District prepared RA Review forms and NODs for geothermal wells should follow the pattern explained in Table 5. Project Activity Titles by Program and Type.</p> <p><i>Note: When reviewing a CEC substitute document, the project description and detailed environmental analysis is contained in the Final Staff Assessment of the substitute document. Information can also be found in the Commission Decision.</i></p>
<p><b>DOGGR as Lead Agency</b> <b>(≤ 49.9 MW)</b></p>	<p>In the rare case that DOGGR is the Lead Agency for the geothermal field development project, DOGGR will also be the Lead Agency for any field development NOI's associated with the project.</p> <p>Once the District has finished the completeness review for the NOI(s) and CEQA Operator Checklist, the CEQA Unit should be notified.</p> <p>The CEQA Unit will process the CEQA review concurrently with NOI review and notify the Geothermal Project Engineer when it is complete. Once the permits are issued the Project Engineer will notify the CEQA Unit that same day, so that the required CEQA notice can be filed with the State Clearinghouse (SCH) in a timely manner.</p>



## Underground Gas Storage

The California Public Utilities Commission (CPUC) has primary regulatory authority over utility-owned and independently-owned natural gas storage facilities. The CPUC issues a Certificate of Convenience and Necessity and conducts CEQA review as part of their certificate approval process. Because of their regulatory authority, the CPUC will act as the Lead Agency for all Underground Gas Storage (UGS) projects. As a result, DOGGR will always be the CEQA Responsible Agency for UGS project approvals and UGS related well NOI's.

UGS Project Approval	
<b>Completeness Review</b>	<p>Districts - Follow Step 1 of the CEQA Document Completeness Review (see Table of Contents).</p> <p>Operator must identify the CPUC environmental document prepared for the UGS facility.</p> <p>WellSTAR will forward the CEQA review to the CEQA HQ Workgroup once the completeness task is signed off.</p>
<b>CEQA Review</b>	The CEQA Unit will conduct Responsible Agency reviews on <b>UGS project approvals</b> (for new, or major modification, or merge of projects).

UGS Well NOIs	
<b>Completeness Review</b>	<p>Districts - Follow Step 1 of the CEQA Document Completeness Review (see Table of Contents).</p> <p>Operator must identify the CPUC environmental document prepared for the UGS facility for the associated wells. WellSTAR will forward Responsible Agency reviews to the District CEQA Workgroups once the completeness task is signed off.</p> <p>If the CPUC environmental document prepared for the UGS facility does not cover work proposed (rework or abandonment) for the associated wells, the document cannot be used. WellSTAR will be filled out accordingly and will forward Lead Agency reviews to the CEQA HQ Workgroup once the completeness task is signed off.</p>
<b>DOGGR RA Review</b>	Districts staff will conduct CEQA Responsible Agency reviews on <b>UGS well NOIs</b> . District staff will follow procedures described earlier in this document.
<b>UGS Project Activity Titles</b>	<p>Project activity titles in District prepared CEQA review documents (CEQA RA Review forms and NODs) for UGS wells should follow the pattern explained in Table 5. Project Activity Titles by Program and Type.</p> <p>Example UGS project activity titles:</p> <p style="padding-left: 40px;">Single well – UGS SoCalGas 0403062751</p> <p style="padding-left: 40px;">Multiple well – UGS SoCalGas 3 wells 10022018</p>

# Underground Injection Control

UIC Application for Injection Approval	
<b>Completeness Review</b>	<p>Districts - Follow Step 1 of the CEQA Document Completeness Review (see Table of Contents).</p> <p>WellSTAR will forward Responsible Agency reviews to the District CEQA Workgroups once the completeness task is signed off, or</p> <p>WellSTAR will forward Lead Agency reviews to the CEQA HQ Workgroup once the completeness task is signed off.</p>
<b>CEQA Review</b>	<p><b>Beginning October 28, 2019 Districts will process Responsible Agency Applications for Injection Approval.</b> Districts will carry out the CEQA Responsible Agency Qualitative Review in WellSTAR. <b>A RA Review Form and Draft NOD is required for all UIC Application for Injection Approvals.</b></p> <p>Once completed, WellSTAR will generate a 2<sup>nd</sup> CEQA review task for the CEQA HQ Workgroup (this may need to be assigned to the individual who is assigned to the program. See CEQA Staff Project Assignment table on the <a href="#">CEQA Doc Insider webpage</a>). CEQA HQ reviews all 2<sup>nd</sup> CEQA review tasks, regardless of CEQA Agency Role (RA or LA).</p> <p>Districts are required to accept the CEQA language in the COA list.</p> <p>Once 2<sup>nd</sup> CEQA review task is completed, Districts can decide on whether to issue the PAL. If issued, they are required to <b>file a NOD with the State Clearinghouse.</b></p>

UIC Well NOIs	
<b>Completeness Review</b>	<p>Districts - Follow Step 1 of the CEQA Document Completeness Review (see Table of Contents).</p> <p>WellSTAR will forward Responsible Agency reviews to the District CEQA Workgroups once the completeness task is signed off, or</p> <p>WellSTAR will forward Lead Agency reviews to the CEQA HQ Workgroup once the completeness task is signed off.</p>
<b>UIC Project Activity Titles</b>	<p>Project activity titles in District prepared CEQA review documents (CEQA RA Review forms and NODs) for injection wells should follow the pattern explained in Table 5. Project Activity Titles by Program and Type.</p> <p>Example UIC project activity titles:</p> <p style="padding-left: 40px;">Single well – UIC Olsen 0403062751</p> <p style="padding-left: 40px;">Multiple well – UIC Olsen 3 wells 10022018</p>

## Supplemental Permits

The CEQA Unit is reviewing how each program uses supplemental permits in order to develop consistent related CEQA procedures statewide. Updates to this section will be made as needed.

**In any situation where a supplemental permit might be approving activities outside the scope of the CEQA review conducted for the original permit, a new CEQA review may be needed. This includes moving the surface location of the project.** Please see the table below to determine how to process supplemental permits at this time.

**Table 7. Supplemental Permit Processing**

CEQA Review Conducted on Original DOGGR Permit?	NOD or NOE filed for Original DOGGR Permit?	Is a CEQA Review Required for the Supplementary Permit?	What do I do with the Supplementary Permit?
No	None	No	No additional CEQA review required
Yes	NOE	Not required. Project already determined exempt	No additional CEQA review required
Yes	NOD	<ul style="list-style-type: none"> <li>Yes, if the surface location of the project changes</li> <li>Yes, if the changes are outside the scope of the environmental document used to approve CEQA review of the original permit</li> </ul>	<ul style="list-style-type: none"> <li>Process RA CEQA review</li> <li>Save to file</li> <li>File another NOD if it's for a new well</li> </ul>

NOD = Notice of Determination. Responsible Agency review. Conducted by Districts.

NOE = Lead Agency review. Conducted by CEQA Unit.