



**NOTICE TO OPERATORS  
2025-05**

**May 15, 2025**

**MODIFIED LICENSED PROFESSIONAL SIGNATURE AND SEAL  
REQUIREMENTS FOR UIC WATER DISPOSAL PROJECTS**

The Department of Conservation, California Geologic Energy Management Division (CalGEM) is updating its February 2, 2021 guidance, issued in NTO 2021-01, regarding licensed professional signature and seal requirements for Underground Injection Control (UIC) water disposal projects.

Previously, CalGEM informed operators that the Board of Professional Engineers, Land Surveyors, and Geologists (BPELSG) had advised that engineering associated with a disposal injection project under CalGEM's UIC program is civil engineering and is not petroleum engineering. Therefore, data and analysis submitted to CalGEM in support of a disposal injection project must be submitted under the signature and seal of a licensed civil engineer, in accordance with California Code of Regulations, title 14, (Regulations), section 1724.7, subdivision (d).

After additional engagement with BPELSG, **CalGEM will no longer require the signature and seal of a civil engineer for UIC water disposal projects** on the basis that safe and effective disposal injection operations generally require the specific knowledge and expertise of petroleum engineers, and such activities do not ordinarily fall within the work of a civil engineer. Petroleum engineers are essential to the comprehensive analysis of water disposal projects required under CalGEM's UIC Program, due to the knowledge possessed within the specialty and the role of water disposal injection within the oil and gas industry. Evaluating the underground injection of water into a known oil field requires knowledge of specific concepts. Petroleum engineers, by practice, have a more nuanced understanding of fluid flow in deep sedimentary reservoirs than most civil engineers.

As a reminder, California Code of Regulations, title 14, section 1724.7, subdivision (d) requires the following: All data required under this section shall be submitted to the Division with a cover page including a statement that appropriate licensed professionals, whose signatures and seals appear at the bottom of the page, are responsible for all data, if any, subject to the requirements of Business and Professions Code sections 6735, 7835, or 7835.1. If the operator determines that the submission does not include material subject to the requirements of Business and Professions Code sections 6735, 7835, or 7835.1, the cover page shall so indicate and shall provide the name(s) and signature(s) of the individual(s) responsible for preparing the submission.

BPELSG staff have emphasized to CalGEM that they welcome inquiries from the regulated community. Questions about the Professional Engineers Act, the Professional Land Surveyors' Act, or the Geologist and Geophysicist Act, and the associated regulations, should be directed to BPELSG's Enforcement Unit at 1-866-780-5370 or [BPELSG.Enforcement.Information@dca.ca.gov](mailto:BPELSG.Enforcement.Information@dca.ca.gov).



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