



September 18, 2026

Matthew Thomas
Bureau of Land Management
National NEPA Register ePlanning Site
Bakersfield Field Office

Re: Comments on the Central California District Oil and Gas Lease Sale (NEPA No. DOI-BLM-C060-2026-0090-EA)

Dear Bureau of Land Management:

The California Department of Conservation and its Geologic Energy Management Division (DOC/CalGEM) appreciates the opportunity to provide comments on the Bureau of Land Management's (BLM) proposed **Central California Oil and Gas Lease Sale** (NEPA No. DOI-BLM-C060-2026-0090-EA).

DOC/CalGEM recognizes BLM's authority over leasing federal mineral interests and appreciates our agencies' longstanding coordination regarding oil and gas development activities within California. As the state agency responsible for regulating oil, gas, and geothermal operations pursuant to Division 3 of the California Public Resources Code (PRC), DOC/CalGEM offers the following comments for consideration as the BLM completes its environmental review under the National Environmental Policy Act (NEPA).

As an initial matter, federal mineral estate leasing proposals do not alter an operator's obligation to comply with California law or diminish CalGEM's independent regulatory authority over oil and gas operations in California, including on federally managed lands. Oil and gas operations conducted on federal lands in California are subject to applicable California statutes, regulations, and permitting requirements. Operators must obtain all required state approvals and comply with applicable operational, environmental, well integrity, plugging and abandonment, public health and safety, and bonding requirements before conducting regulated activities.

DOC/CalGEM encourages continued early coordination between the BLM and CalGEM throughout both the lease sale process and any subsequent project-specific review. Early consultation allows both agencies to identify applicable regulatory

requirements, evaluate potential operational constraints, exchange technical information, and ensure that the project proponents are aware of the approvals that may be required before development activities may commence. Continued collaboration between our agencies will promote efficient permitting while ensuring that public health and safety, environmental protection, tribal consultation, and resource conservation objectives are appropriately met and addressed.

I. Health Protection Zones

In California, oil and gas development proposed within Health Protection Zones (HPZs) is subject to additional statutory and regulatory requirements. CalGEM's permitting authority is subject to SB 1137, codified in PRC section 3280 et seq. SB 1137 creates HPZs within a 3,200-foot area around "sensitive receptors," as defined in subdivision (b) of PRC section 3280. SB 1137 sets forth new requirements related to HPZs and to wells and production facilities based on the wells' location relative to an HPZ.

DOC/CalGEM has identified the following lease parcels that appear to be partially or wholly located within HPZs. (See Figures 1 and A-D):

- **Parcels Partially within HPZ:**
 - CA-2099-01-0136 (Figure A)
 - CA-2099-01-0132 (Figure A)
 - CA-2099-01-0175 (Figure A)
 - CA-2099-01-0144 (Figure A)
 - CA-2099-01-0081 (Figure B)
 - CA-2099-01-0103 (Figure B)
 - CA-2099-01-0149 (Figure B)
 - CA-2099-01-0123 (Figure B)
 - CA-2099-01-0162 (Figure B)
 - CA-2099-01-0165 (Figure B)
 - CA-2099-01-0167 (Figure B)
 - CA-2099-01-0147 (Figure C)
 - CA-2099-01-0188 (Figure C)
- **Parcels Entirely within HPZ:**
 - CAP106818522 (Figure A)
 - CA-2099-01-0177 (Figure A)
 - CA-2099-01-0135 (Figure B)
 - CAP106820777 (Figure D)

DOC/CalGEM's HPZ mapping tool can be accessed here: [Health Protection Zones in California](#).

DOC/CalGEM recommends that the BLM identify these parcels in its environmental analysis and coordinate with DOC/CalGEM regarding any proposed future development within these areas. These parcels should receive particular attention and analysis, and future lessees should be advised of applicable California requirements that may affect project planning, permitting, and operations. Some of these requirements are discussed below.

CalGEM may not approve a permit for any well with a wellhead (i.e., a surface location) located within an HPZ, unless a specific exception applies. Construction and operation of new production facilities within an HPZ are also prohibited unless necessary to protect public health and safety. Existing oil and gas production operations within an HPZ are subject to additional operational requirements and noise, light and dust restrictions. (See PRC, § 3282.) In addition, by July 1, 2030, all existing oil and gas production operations within an HPZ must have a fully implemented leak detection and response plan, approved by CalGEM with concurrence of the California Air Resources Board. (PRC, § 3283.)

II. CEQA Compliance

CalGEM's discretionary approvals of oil and gas well drilling permits and injection approval requests must comply with the California Environmental Quality Act (CEQA) (Public Resources Code § 21000 et seq.). Because BLM's Environmental Assessment (EA) does not include a CEQA or equivalent analysis, CalGEM will require an environmental assessment that complies with California law before reviewing and approving any oil and gas permits or requests. This includes separate discussions of mitigation measures, cumulative impacts, greenhouse gas emissions, tribal cultural resources and growth-inducing impacts of the proposed action. See Appendix G of the CEQA Handbook for further information.

III. NEPA Compliance

The BLM should analyze the reasonably foreseeable environmental effects from the variety of oil and gas activities that may be authorized under the project to support reasoned decision-making regarding the proposed action. (NEPA, § 106(b)(2); Department of Interior Handbook of NEPA Procedures February 2026, section 1.5 (c)(3), p. 8.) The draft EA, "...assumes that up to 4 of the 40 wells which may result from the proposed lease sale could be completed using hydraulic fracturing technology," despite California's prohibition on this method of well stimulation. In California, an operator must obtain a permit from CalGEM prior to conducting hydraulic fracturing operations on a well. (PRC, § 3160, subd. (d).) Effective October 1, 2024, CalGEM may not permit new well stimulation treatments. (Cal. Code Regs, tit. 14, § 1780, subd. (d).)

A full understanding of the risks from oil and gas production requires studying all types of production wells. Although hydraulic fracturing is no longer permitted in California, the EA should evaluate other enhanced recovery techniques used in California oilfields for potential impacts to the environment. These recovery techniques include water flood, steam flood, cyclic steam, and dual type that alternates between steam and water flood.

The draft EA includes a Finding of No Significant Impact (FONSI) despite the fact that consultation with the United States Fish and Wildlife Service pursuant to Section 7 of the Endangered Species Act has not yet occurred and surveys for certain species have not been completed. CalGEM recommends completing these activities before determining whether a FONSI applies to this project.

The draft EA states that because the *leasing* of oil and gas parcels does not entail ground disturbing activities, a lease would not result in direct impacts to cultural resources. It is reasonably foreseeable and directly stated in the draft EA and FONSI that ground disturbing activities will likely result from oil and gas leases. Additionally, the draft EA includes a list of parcels that were surveyed for cultural resources. However, many do not actually appear to have been surveyed, and most surveys covered only a small percentage of the acreage of each land lease. (See Appendix H.) Since a tribe's trust land may be located outside of the tribe's ancestral territory, we recommend that BLM contact the California's Native American Heritage Commission for assistance in compiling an exhaustive list of tribes with sacred lands and ancestral territory located within the affected area. Additionally, extra care should be taken to work with tribes to identify and protect sensitive cultural resources.

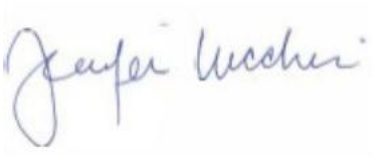
IV. Conclusion

DOC/CalGEM welcomes continued coordination with the BLM during completion of the environmental documentation associated with this lease sale and any subsequent project-specific environmental review. Although leasing itself does not authorize surface-disturbing activities, a future Application for Permit to Drill and other development proposals may require additional environmental analysis and coordination between federal and state agencies. Early engagement will help ensure that relevant technical information, regulatory requirements, and environmental considerations are incorporated into future environmental documents and facilitate efficient review of proposed development activities.

DOC/CalGEM appreciates the opportunity to provide these comments and looks forward to continuing its partnership with the BLM to support responsible resource development while protecting public health, safety, natural resources, and the environment.

If you have any questions regarding these comments or wish to coordinate on future environmental review, please contact DOC/CalGEM at your convenience.

Sincerely,

A handwritten signature in blue ink that reads "Jennifer Lucchesi". The signature is written in a cursive style with a large initial "J" and a long, sweeping underline.

Jennifer Lucchesi
Director, Department of Conservation

Figure 1

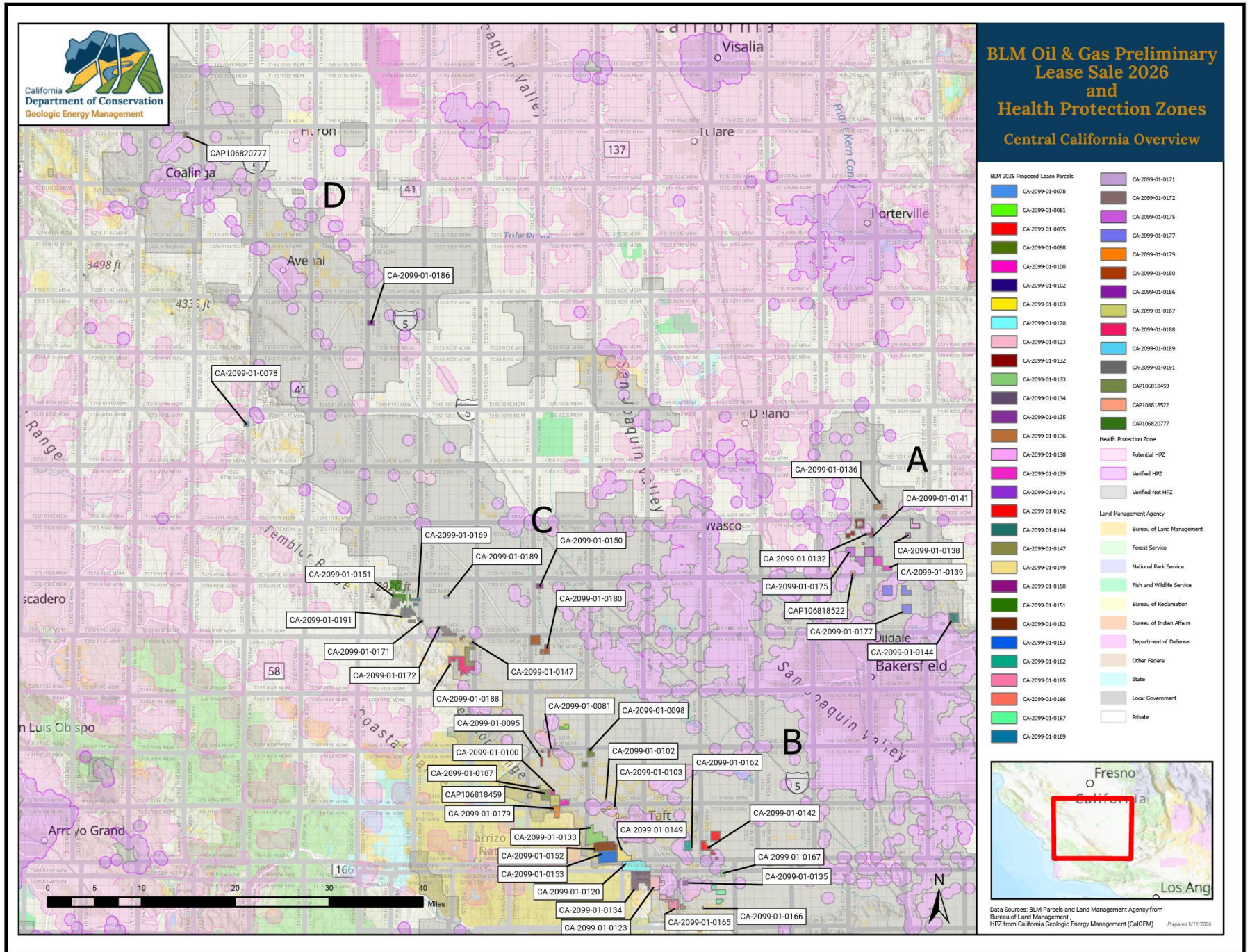


Figure A

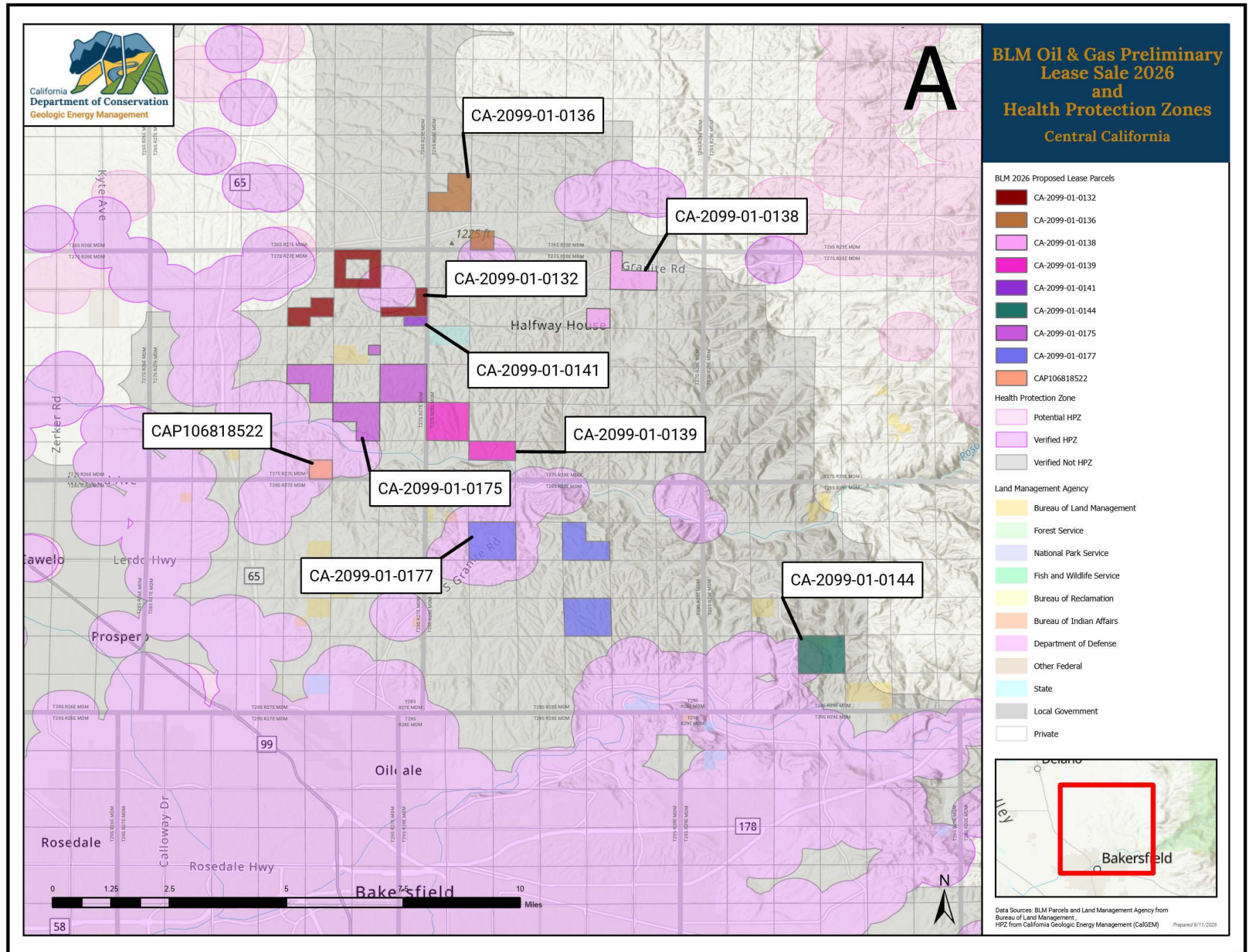


Figure B

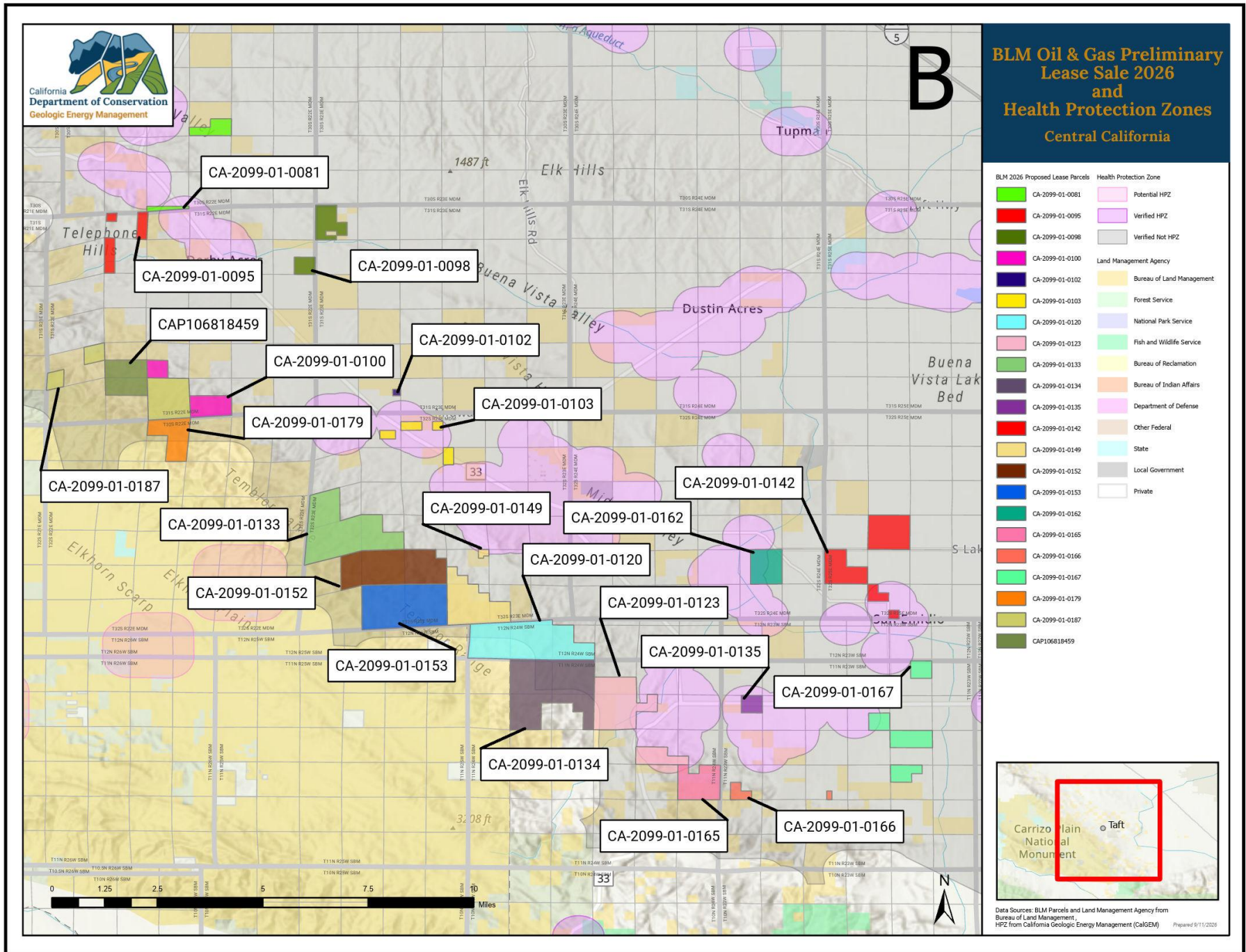


Figure C

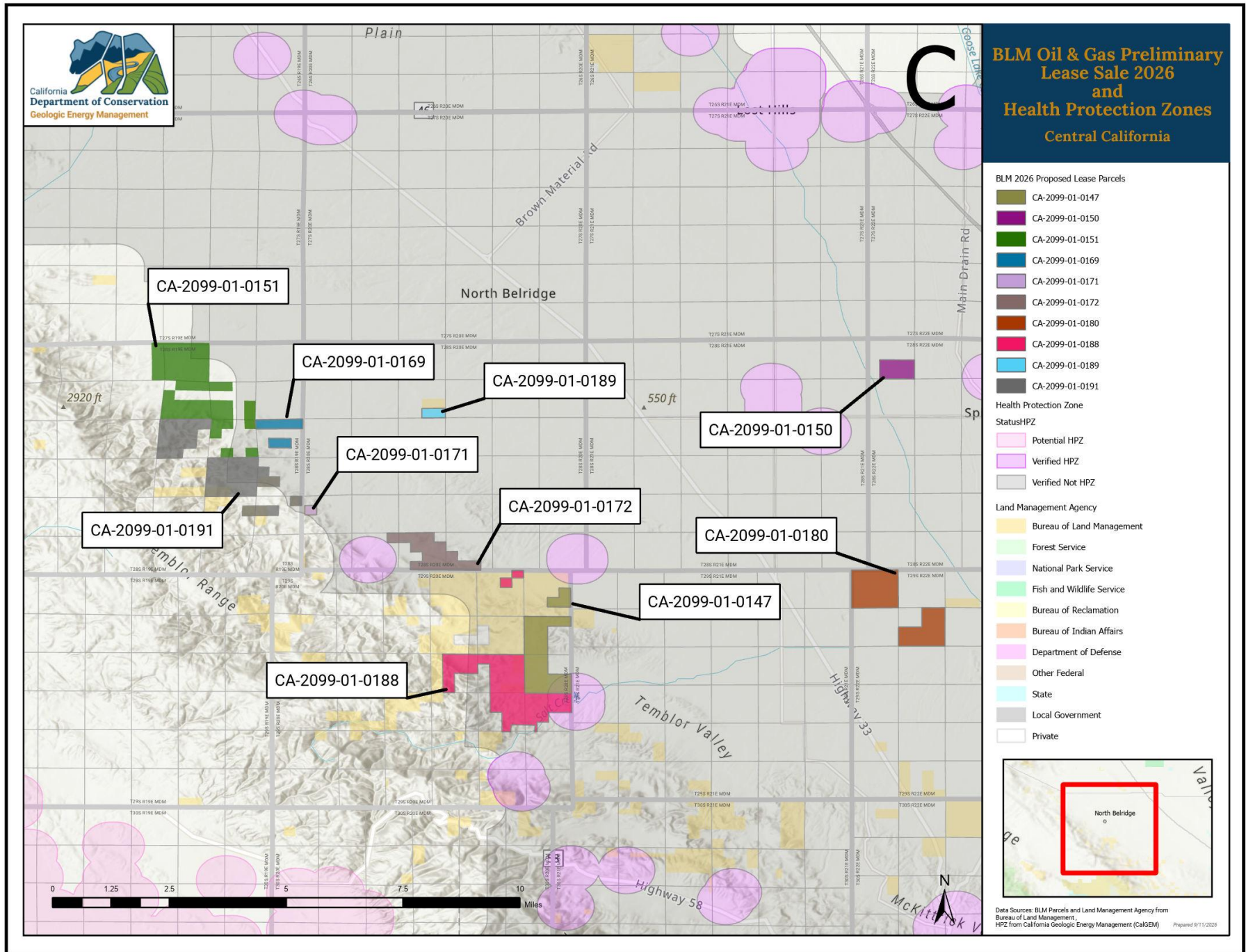


Figure D

