



NOTICE TO OPERATORS 2024-02

February 22, 2024

GUIDANCE FOR CEQA COMPLIANCE FOR PROPOSED UNDERGROUND INJECTION CONTROL OPERATIONS

This notice is to clarify the process for submission and review of an Application for Injection Approval (UIC Application) and related Notices of Intention (NOIs) for proposed well-drilling associated with the underground injection project.

The California Geologic Energy Management Division (CalGEM) regulates injection wells associated with California oil and gas production to prevent damage to life, health, property, and natural resources and upholds regulatory requirements designed to ensure that injection will be confined to the approved injection zone and not migrate into a zone where it could degrade valuable groundwater or hydrocarbon resources. Under applicable regulations, applicants must provide geological, engineering, and injection plan documents and data, necessary for evaluation of the project, including:

- The planned well-drilling and plugging-and-abandonment program to complete the project... (Cal. Code. Regs., tit. 14, §1724.7(a)(1)(D))
- Identification of all wells that are part of the underground injection project, including injection wells, affected production wells, water source wells, observation or other wells, and any planned wells to the extent known... (Cal. Code. Regs., tit. 14, §1724.7(a)(3)(D))

Consistent with CalGEM's regulations, and the core principles of the California Environmental Quality Act (CEQA) to evaluate the "whole of an action," operators should submit a UIC Application and NOIs for any wells that are part of an underground injection project¹ as a comprehensive package to every extent possible. (Cal. Code. Regs., tit. 14, §§ 1724.6, 1724.7, and 15378(a).) This will facilitate an efficient environmental review process and enable CalGEM to carry out its responsibilities in reviewing pending and future UIC Applications and NOIs in a more efficient manner.

NOIs to drill or rework a well that are part of a new or expanded underground injection project may not be approved until the environmental review process for the entire project, including review of the planned drilling and injection activities, is complete.

¹ As described in California Code of Regulations, Title 14, Section 1724.7(a)(3)(D).



Operators are informed of the following:

- Some pending NOIs for drilling or reworking a well for the purpose of injection will be returned and will need to be resubmitted to ensure NOIs associated with underground injection projects are correctly associated with the project as a whole.
- Before returning the NOIs, CalGEM will consult operators provide with a list of proposed projects that CalGEM intends to return. Instructions regarding the submission and resubmission of NOIs associated with a new or expanded underground injection project will be provided as part of that consultation. The instructions may address CEQA project descriptions, other necessary materials, and changes to the WellSTAR system.

If you have any questions or concerns regarding compliance with this notice, please submit those to CalGEM Headquarters by email at: CEQA@conservation.ca.gov. In the email subject include NTO 2024-02.

Sincerely,

Doug Ito
State Oil and Gas Supervisor