California
Department of
Conservation
California Geologic Energy
Management Division (CalGEM)

Workshop: Updates to Class II UIC Project Approval Process

March 17, 2026
Facilitation, Sarah Rubin, DOC

Agenda

- **Welcome**
- **Context Setting**
- **Revised UIC Review Process**
- **Updated MOA Checklist**
- **Open Q&A**
- **Wrap-Up**

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Context Setting

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March 2026

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California Geologic Energy Management Division (CalGEM)

Updated UIC Project Approval Process

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March 2026

Overview

- **Objective and Goal**
- **Key Updates**
- **Noteworthy Procedural Changes**
- **Expectations For Operators**
- **New Process Implementation**
- **Questions**

Objective and Goal

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Objective

Update and streamline the UIC project approval process in coordination with the Water Boards (WBs) to incorporate lessons learned, eliminate inefficiencies, clarify roles and requirements, and improve overall process consistency and transparency.

Goal

Reduce UIC project approval processing time to the greatest extent practicable.

Improve review efficiency, enhance coordination among reviewing agencies, and provide a clearer and more predictable process for operators.

Key Updates

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Updated appendices to the revised memorandum of agreement (MOA)

1. Appendix A – Updated Interagency Workflow

- ✓ **Appendix A memorializes the updated UIC project approval workflow and identifies new opportunities for parallel review among CalGEM, the Water Boards (WBs), and CEQA staff, where practicable.**

2. Appendix B – Updated UIC Project Data Requirements (MOA Checklist)

- ✓ **Appendix B contains an updated version of the UIC Project Data Requirements checklist.**
- ✓ **This checklist is used by CalGEM and the WBs to coordinate and document interagency review of Class II underground injection projects.**
- ✓ *Note: The MOA checklist is intended primarily for use by CalGEM and the WBs in implementing the Revised MOA.*
- ✓ *To assist operators in preparing complete, high-quality applications that align with agency expectations.*

Noteworthy Procedural Changes

1. Implement pre-application meetings
2. Updated MOA Checklist
3. Early Area of Review (AOR) Wellbore Diagram Evaluation
4. Early Water Boards (WBs) review for beneficial use waters
5. Direct Communication Between WBs and Operators
6. Parallel CEQA and Technical Review

1. Pre-Application Meeting

Prior to submitting an Application for Underground Injection form in WellSTAR, operators are expected to request a pre-application meeting

Purpose

- **Provide early feedback and identify potential issues before formal submission via WellSTAR.**

How the Pre-Application Meeting Supports Success

- **An early overview of the proposed project**
- **Initial guidance from reviewing agencies**
- **An opportunity for all stakeholders to ask questions and identify potential issues before an application is submitted**

Benefit

- **Improvement of initial application quality and completeness**
- **Limit requests for additional information from operators**

2. Updated MOA Checklist

The updated MOA checklist now consolidates the CalGEM and WBs tabs into a single detailed checklist.

Purpose

- **Reduce the duplication in the current MOA checklists and improve first submission quality**

How the Updated MOA Checklist Supports Success

- **Increased transparency, clarity, and predictability for operators**
- **Enhanced documentation of due diligence for CalGEM application evaluations**
- **Feedback and comments from state and operator experts have been received and incorporated into the final version.**

Benefit

- **Promotes improved completeness and higher quality initial applications from operators**
- **Expedites secondary reviews performed by CalGEM PG, HQ program, and WBs**

3. Early AOR Wellbore Diagram Evaluation

CalGEM districts conduct AOR wellbore evaluation, focusing on cement calculation methodology and well construction accuracy.

Purpose

- **Finds systemic issues with operator methodology and/or wellbore diagrams for early feedback to operators**

How Wellbore Diagram Deep Dive Supports Success

- **Early feedback means the operator can begin to address issues in parallel with CalGEM review of the rest of the application.**
- **Will not delay or block the overall review process by CalGEM or WBs**
- **The results of the evaluation can also be available for distribution to WBs, as needed**

Benefit

- **Early feedback reduces operator wait time when significant issues arise**
- **Parallel reviews improve efficiency and shorten overall project timelines**

4. WBs' Early Review of Beneficial Use Waters

After the Intake (Completeness) Review, CalGEM sends key information to WBs to begin early evaluation of water supply wells and determine the presence of beneficial use waters of concern in parallel with CalGEM application review.

Purpose

- **To streamline the approval process through early engagement of WBs in the review process.**

How Early WBs Review Supports Success

- **Reduce duplication of CalGEM review of water quality material.**
- **WBs will work directly with operators to resolve their comments and questions.**

Benefit

- **Reduce review timelines via early engagement.**

5. Direct Communication Between WBs and Operators

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During the review, the WBs will work directly with operators to address comments and questions. WB comments will no longer be routed through CalGEM for operator coordination.

Purpose

- **Expedite the process for addressing WBs' concerns**

How WBs' Direct Communication with Operators Supports Success

- **Reduce time and workload for CalGEM district staff while providing operators with clearer communication of WBs' concerns**
- **Evaluation outcomes should be shared directly with operators during multiple review steps, with CalGEM copied, so deficiencies can be addressed**
- **Revised documents submitted via WellSTAR**

Benefit

- **Operators receive clear communication directly from Water boards, improving operator turnaround time.**
- **WBs reviews are more streamlined.**

6. Parallel CEQA and Technical Review

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Key Modifications

1. **Developed a CEQA checklist and included; and**
2. **CEQA representatives in pre-application meetings**
   - **Purpose**
     - **Receive a complete package, including the project description, early to initiate CEQA review**
   - **Benefits**
     - **Increased transparency and predictability**
     - **Early feedback allows operators to address issues in parallel with CalGEM review**
     - **Identify possible exemptions or need for full CEQA evaluation**
3. **Initiate CEQA review earlier in the process (Parallel Review)**
   - **Purpose**
     - **Reduce overall UIC CEQA review timeline**
     - **CEQA review begins after the**
   - **Benefits**
     - **CEQA comments can be addressed alongside district/WBs review**
     - **Shortens total processing time**

EXPECTATIONS FOR OPERATORS

Expectations For Operators

Incomplete or low-quality applications cause repeated requests for information, delaying projects and straining agency resources.

To fully realize the benefits of the updated workflow, operators are expected to:

- **Submit complete, well-prepared applications that address all regulatory requirements**
- **Use the updated MOA checklist and CEQA checklist to guide application readiness**
- **Respond promptly and thoroughly to agency comments**

Note: Applications that do not meet completeness requirements found during the intake review will not continue in the review process and will be returned to the operator

Note: CalGEM recommends operators take advantage of pre-application meetings to help ensure applications are complete and of sufficient quality at the time of submittal.

New Process Implementation

New Process Implementation

- **The new process will be implemented beginning April 1, 2026.**

- **Applications Submitted on or After April 1, 2026**
  - i. **New workflow will apply**
    - **Utilize the updated MOA checklist and the CEQA checklist**
  - ii. **A pre-application meeting is expected prior to application submittal.**
  - iii. **Operators are expected to come prepared to pre-application meetings to ensure productive use of agency time.**
  - iv. **Pre-application meeting expectations, meeting request form and a proposed agenda topics will be available on the "For Operators - Underground Injection Control" webpage.**

New Process Implementation cont.

The following steps apply to all applications in process as of April 1 and will be determined by the application's status in the WellSTAR review workflow.

i. Before Legacy Completeness Checks

- Applications may be returned to operators
  - Returning applications to operators will be based on the quality and completeness of the submitted application.
  - If returned, operators should review and resubmit the application using the updated MOA checklist and the CEQA checklist.

ii. Past Legacy Completeness Check and under CalGEM review

- CalGEM will continue technical review and communicate with operators if additional information is necessary.
- CalGEM districts will inform WBs of applications ready for water supply well evaluation and beneficial use waters of concern determination.
- When necessary, CEQA information guided by the CEQA checklist should be emailed to the CalGEM district technical lead.

New Process Implementation cont.

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iii. Under Water Boards review

- Applications will continue with WBs review
- WBs will communicate new comments directly to operators.
- Operators should respond to comments received before April 1, 2026, using the pre-April 1 process by submitting responses to the CalGEM district technical lead for transmittal to the WBs.
- When necessary, CEQA information guided by the CEQA checklist should be emailed to the CalGEM district technical lead.

iv. Under CEQA review

- Process remains unchanged for projects where CalGEM is the lead agency.
- When necessary, CEQA information guided by the CEQA checklist should be emailed to the CalGEM district technical lead.


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2026 Updated MOA UIC Checklist

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March 2026

Revised MOA Checklist Summary

- **Checklist Objective**
  - Support both applicants and regulators in achieving a more streamlined, predictable, and technically robust UIC review process
  - Shorten review timelines

- **Checklist Goals**
  - Decrease incomplete submissions
  - Enhance submission quality
  - Reduce redundancy between CalGEM and the Water Boards
  - Standardize review process across the State (CalGEM Districts and Regional Water Boards)

- **Notable Changes**
  - Single consolidated checklist replaces separate Water Boards and CalGEM checklists
  - Project Summary tab was added
  - Discrete items in separate cells replace grouped items in cells
  - Reorganized content, including new Project Overview section
  - Checkboxes for Operator submission (intake review) and CalGEM technical review
  - Additional information provided to enhance clarity

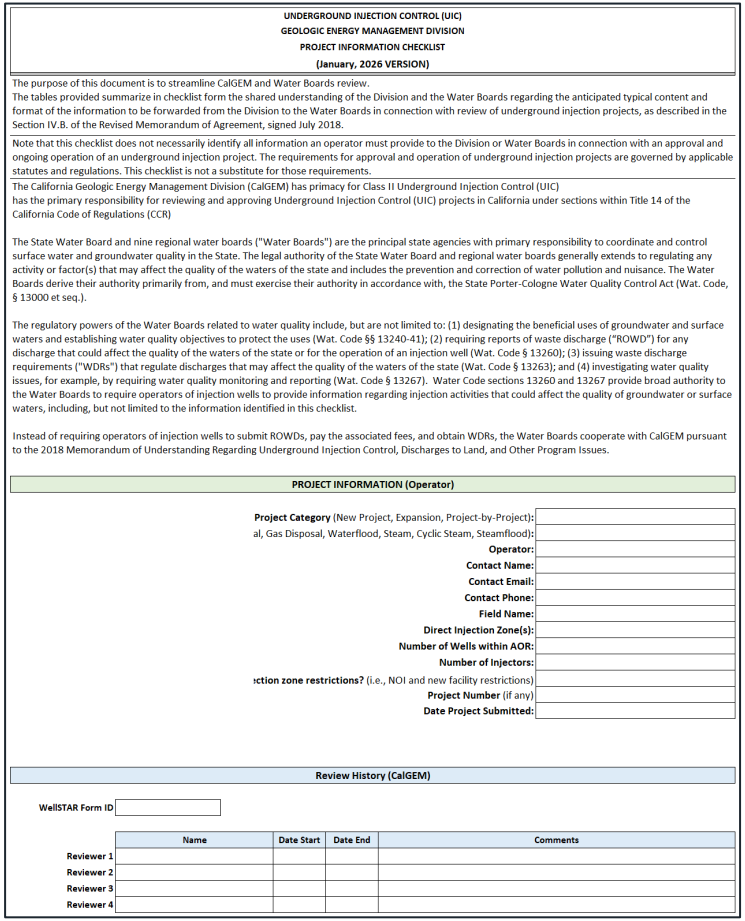
- **Contributors:**
  - Experts from each CalGEM District, CalGEM HQ, the State and Regional Water Boards, both CalGEM and WB Legal departments, and select operators and consultants
  - All comments and suggestions were considered, though not all were incorporated into checklist

Project Summary Tab

- **Purpose, scope, and interagency regulatory authority of checklist section**
  - **Disclaimer: the checklist is intended for CalGEM and Water Boards review and provided to applicants as guidance. The checklist is not a replacement for regulations.**
  - **The Water Boards cooperate with CalGEM via the MOA by requiring information in the checklist (but not limited to) in lieu of requiring operators to:**
    - **Submit reports of waste discharge**
    - **Pay additional fees**
    - **Obtain waste discharge requirements**

- **Project Information section**
  - **Provides CalGEM and Water Boards with project information and points of contact.**

- **CalGEM Review History section**
  - **Documents the review history for CalGEM evaluations.**



UNDERGROUND INJECTION CONTROL (UIC)
GEOLOGIC ENERGY MANAGEMENT DIVISION
PROJECT INFORMATION CHECKLIST
(January, 2026 VERSION)

The purpose of this document is to streamline CalGEM and Water Boards review.
The tables provided summarize in checklist form the shared understanding of the Division and the Water Boards regarding the anticipated typical content and format of the information to be forwarded from the Division to the Water Boards in connection with review of underground injection projects, as described in the Section IV.B. of the Revised Memorandum of Agreement, signed July 2018.

Note that this checklist does not necessarily identify all information an operator must provide to the Division or Water Boards in connection with an approval and ongoing operation of an underground injection project. The requirements for approval and operation of underground injection projects are governed by applicable statutes and regulations. This checklist is not a substitute for those requirements.

The California Geologic Energy Management Division (CalGEM) has primacy for Class II Underground Injection Control (UIC) has the primary responsibility for reviewing and approving Underground Injection Control (UIC) projects in California under sections within Title 14 of the California Code of Regulations (CCR)

The State Water Board and nine regional water boards ("Water Boards") are the principal state agencies with primary responsibility to coordinate and control surface water and groundwater quality in the State. The legal authority of the State Water Board and regional water boards generally extends to regulating any activity or factor(s) that may affect the quality of the waters of the state and includes the prevention and correction of water pollution and nuisance. The Water Boards derive their authority primarily from, and must exercise their authority in accordance with, the State Porter-Cologne Water Quality Control Act (Wat. Code, § 13000 et seq.).

The regulatory powers of the Water Boards related to water quality include, but are not limited to: (1) designating the beneficial uses of groundwater and surface waters and establishing water quality objectives to protect the uses (Wat. Code §§ 13240-41); (2) requiring reports of waste discharge ("ROWD") for any discharge that could affect the quality of the waters of the state or for the operation of an injection well (Wat. Code § 13260); (3) issuing waste discharge requirements ("WDRs") that regulate discharges that may affect the quality of the waters of the state (Wat. Code § 13263); and (4) investigating water quality issues, for example, by requiring water quality monitoring and reporting (Wat. Code § 13267). Water Code sections 13260 and 13267 provide broad authority to the Water Boards to require operators of injection wells to provide information regarding injection activities that could affect the quality of groundwater or surface waters, including, but not limited to the information identified in this checklist.

Instead of requiring operators of injection wells to submit ROWDs, pay the associated fees, and obtain WDRs, the Water Boards cooperate with CalGEM pursuant to the 2018 Memorandum of Understanding Regarding Underground Injection Control, Discharges to Land, and Other Program Issues.

PROJECT INFORMATION (Operator)

Project Category (New Project, Expansion, Project-by-Project):
al, Gas Disposal, Waterflood, Steam, Cyclic Steam, Steamflood):
Operator:
Contact Name:
Contact Email:
Contact Phone:
Field Name:
Direct Injection Zone(s):
Number of Wells within AOR:
Number of Injectors:
ction zone restrictions? (i.e., NOI and new facility restrictions)
Project Number (if any)
Date Project Submitted:

Review History (CalGEM)

WellSTAR Form ID

	Name	Date Start	Date End	Comments
Reviewer 1				
Reviewer 2				
Reviewer 3				
Reviewer 4				

Discrete Items Replace Grouped Items

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Previous Checklist Format: Grouped Items

GS(1)	Geologic information describing the reservoir characteristics of the injection zone, such as porosity, permeability, average thickness, areal extent, fracture gradient, original and present temperature and pressure, and original and residual oil, gas, and water saturations. The scope of the geologic characterization shall encompass the caprock and sealing mechanisms, the injection zone including the vertical interval above and below the approved injection zone, and the areas where potential migration of fluid or entrapment of migrated fluid could occur. *The Division and Water Boards agree all supporting data shall be the most current, accurate and relevant. All data sources shall be cited.*	1724.7(a)(2)(A)	☐

New Checklist Format: Discrete Items in Individual Cells

Section Code	Reference Authority	Item	Completed (Operator)
GS(1)	§1724.7 CWC - 13260/13267	The scope of the geologic characterization needs to encompass:	
		Stratigraphy of project area	☐
		Injection Zone	☐
		Sealing mechanism	☐
		Upper confining layer (caprock)	☐
		Lower confining layer, if any	☐
		Areas/zones of potential migration or entrapment of fluid	☐
		Discussion of any identified geologic features that could result in the migration of fluid out of the approved injection zone	☐
		All supporting data which is most current, accurate, and relevant	☐
		Method and data used to determine the base of the USDW	☐
	§1724.6(a)	*All data sources cited*	☐
	§1724.7(a)(2)(A) §1724.7(a)(2)(C)	Geologic information describing the reservoir characteristics of the injection zone, such as:	
		Porosity (min, max, average)	☐
		Permeability (min, max, average)	☐
		Thickness (min, max, average)	☐
		Fracture gradient	☐
		Original temperature	☐
		Current temperature	☐
		Original pressure	☐
		Current pressure	☐
		Original oil saturation	☐
		Residual oil saturation	☐
		Original gas saturation	☐
		Residual gas saturation	☐
		Original water saturation	☐
		Residual water saturation	☐

- **Benefits**
  - **Clearer expectations decrease incomplete submissions**
  - **Applicants can more easily self-audit against checklist sections**
  - **Fewer requests for missing items or for clarification improves overall review timelines**
  - **Improved documentation and tracking of review**

UIC Checklist Content

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- **Reorganized content**
  1. **Data Format**
  2. **Cover Letter**
  3. **Project Overview (new section)**
  4. **Geologic Study**
  5. **Engineering Study**
  6. **Injection Plan**
  7. **Situational Information**
  8. **Other Information**

- **Logical technical workflow**
  - **Aligns with how risk assessment and regulatory review are typically conducted**
    - **Geologic characterization precedes engineering design**
    - **Engineering design supports the injection plan**
    - **Operational details follow foundational technical analyses**

- **Benefits**
  - **Reduces ambiguity about where information should be included**
  - **Minimizes duplication of information across sections**

Checklist Structure and Layout

Section	Section Code	Reference Authority	Item	Completed
Data Format	DF(1)	§1724.7(c)	All data supporting the underground injection project are in digital format.	☐
	DF(2)	§1724.7(c)	Maps are clearly and appropriately labeled with:	
			Title	☐
			Scale	☐
			North arrow	☐
			UIC project number, if any	☐
			Legend describing symbols, colors, and other key features shown on map	☐
			Well symbols and well identifiers are clearly posted on each map	☐
			Significant Boundaries, including the area of review, project area, and existing exemption boundaries	☐
			Other relevant data	☐
			Diagrams and exhibits are clearly and appropriately labeled.	☐
Cover Letter	CL(1)	§1724.7(d)	Cover letter including a statement that appropriate California-licensed professional(s) are responsible for all data, interpretations, and calculations, if any, in accordance with Business and Professions Code sections (BPC) 6730-6749, 7835, and 7835.1 as applicable. Include the following:	☐
		CWC - 13260	*A statement with supporting rationale identifying whether injected Class II fluids have migrated beyond the exempt aquifer or into a USDW for ongoing projects, and demonstrating that such migration will not occur for any project*	☐
			Stamp and signature of appropriate licensed professional(s) at bottom of page	☐
		§1724.7(d)	If the operator determines that the submission does not include data, interpretations, or calculations subject to the requirements of BPC sections 7835 and 7835.1, the cover page must so indicate, and must provide the name(s) and signature(s) of the individual(s) responsible for preparing the submission.	☐
Project Overview	PO(1)	§1724.6(a)	Project summary, including:	
		§1724.7(a)(3)(A)	*Statement of primary purpose of the project*	☐
		§1724.6(a)	*Location details, including principal meridian(s), section(s), township(s), and range(s)*	☐
			UIC project number, if any	☐
			Current PAL date, if any	☐
			Injection zone name(s)	☐
			Clearly stated method used to define the AOR (e.g., fixed ¼-mile radius, calculated ZEI, or other)	☐
			Project duration	☐
			Volume (including historical, if applicable)	☐
			Number of injection wells	☐
			Presence or absence of freshwater and/or USDW	☐
			A regional location map showing oilfield and other significant boundaries, if any, is recommended to aid reviews	☐
		§1724.7(a)(1)(B) §1724.8 §1724.6 CWC - 13260/13267	Map of the AOR showing: *(The historical term 'project area' may be shown as the map view projection of the injection zone defined in 1720.1(g). The 'project area' can include a single AOR, multiple AORs, or any overlapping cumulative effects of the AORs.)*	
			All wells within and adjacent to the boundary of the AOR, including surface and bottom-hole locations, wellbore paths, well identifiers, and symbols which display their well type and status (e.g. active steamflood injector)	☐
			All water supply wells that are within the AOR and identified in public records or known to operator	☐
		CWC - 13260/13267	*All wells which have been identified as potential conduits to a USDW*	☐
		§1724.7(a)(1)(B) §1724.8	*Any underground disposal, horizons, mining, and other subsurface industrial activities not associated with oil and gas production within the AOR, to the extent such information is publicly available*	☐
			Traces of the geologic cross-sections provided as part of the Geologic Study	☐
		CWC - 13260/13267	*All faults within the project area*	☐
	GS(1)	§1724.7 CWC - 13260/13267	The scope of the geologic characterization needs to encompass:	
			Stratigraphy of project area	☐
			Injection Zone	☐
			Sealing mechanism	☐
			Upper confining layer (caprock)	☐
			Lower confining layer, if any	☐
			Areas/zones of potential migration or entrapment of fluid	☐
			Discussion of any identified geologic features that could result in the migration of fluid out of the approved injection zone	☐
			All supporting data which is most current, accurate, and relevant	☐
			Method and data used to determine the base of the USDW	☐
		§1724.6(a)	*All data sources cited*	☐
			Geologic information describing the reservoir characteristics of the injection zone, such as:	
			Porosity (min, max, average)	☐
			Permeability (min, max, average)	☐
			Thickness (min, max, average)	☐
			Fracture gradient	☐

This screenshot shows only a partial view of the checklist.

Clarifying Information

- **Clarification and//or contextual information**
  - **Provided where deemed useful or important**
  - **Largely based on recurring gaps identified across prior submissions and repeated requests for additional material and from CalGEM, Water Boards, operator, and consultant input**

Example Clarifications and Contextual Information

Faults identified in area (with displacement information).
If faults are identified, an analysis addressing whether or not the faults are capable of confining the fluid to the approved injection zone (e.g., pressure data, water quality data, juxtaposition analysis, shale gouge ratio for clay smear analysis, or relevant analog)

Identifies freshwater aquifers and the base of freshwater (defined in §1720.1(e) as water containing TDS ≤3000 mg/L, regardless of hydrocarbon content or exemption status)

Well Construction diagrams for all wells and boreholes within the AOR which penetrate the injection zone need to be provided. Each diagram should identify all of the data specified in Section 1724.7.1, including but not limited to:
Depth
Perforated /Slotted Interval (s)
Cement (e.g., annular seal, plugs, and squeezes)
Casing Damage
Key Geologic Markers (e.g. injection zone , confining zone, all oil and gas zones)
Base of Freshwater
Base of USDW
Each well and borehole diagram needs to depict the entire history (e.g. sidetracks, redrills, and other mechanical changes)

The blue text indicates clarifications and contextual additions

CalGEM Reviews and Checkboxes

- **Operator Checklist / Notes, and CalGEM Intake Review (Formerly Called "Completeness Check")**
  - **Operator completes checklist to document and track submitted materials**
    - **Identifies specific location of each item within the application package**
    - **Provides any clarifying or contextual information for CalGEM consideration, including explanations for any missing or omitted materials or why material differs from traditional or standard material, for example**
  - **This section also supports CalGEM's intake review process (formerly referred to as the "completeness check")**
    - **facilitates a more efficient review, helping to reduce intake review timelines**

- **CalGEM Technical Review Notes (Formerly Called "Detailed Review")**
  - **Supplements and supports CalGEM HQ and Water Boards reviews, promoting more efficient evaluation and reduced review timelines**

Completed by operator and confirmed by CalGEM (intake review)

CalGEM technical review

Check box if submitted

Identify location

Explanations for omitted items or additional context

Section	Section Code	Reference Authority	Item	Completed (Operator)	Location in Package (Operator)	Notes (Operator)	Reviewed (CalGEM)	Notes (CalGEM)
Data Format	DF(1)	§1724.7(e)	All data supporting the underground injection project are in digital format.	☐			☐	
	DF(2)	§1724.7(e)	Maps are clearly and appropriately labeled with:					
			Title	☐			☐	
			Scale	☐			☐	
			North arrow	☐			☐	
			UIC project number, if any	☐			☐	
			Legend describing symbols, colors, and other key features shown on map	☐			☐	
			Well symbols and well identifiers are clearly posted on each map	☐			☐	
			Significant Boundaries, including the area of review, project area, and existing exemption boundaries	☐			☐	
			Other relevant data	☐			☐	
			Diagrams and exhibits are clearly and appropriately labeled.	☐			☐	

THANK YOU

Questions?

California
Department of Conservation

Open Q&A

Questions can be emailed to UIC.Implementation@conservation.ca.gov

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