RECORD OF CATEGORICAL EXCLUSION DETERMINATION

Page 1 of 2

Project ID No. SPR Workover Services Contract

Project ID No.: SPR Workover Services Contract

Title: SPR Site Support Workover Activities

Description: This document covers the support activities of equipment rental, purchase of materials, and services under FFPO supervision for oil caverns and brine disposal wells associated with SPR Site Workovers. Subcontractor shall furnish all materials, tools, equipment, supplies, transportation facilities, labor, supervision, and services required to provide the following:

- Rental of blow out preventers
- Drill pipe and pipe handling rental equipment
- · Auxiliary rig rental equipment
- Cavern depressurization equipment
- Mechanical bridge plug/packer equipment and services
- Disposal of E&P waste
- Perform final flange makeup on wellhead flanges or removal of nuts and studs from existing wellheads that are being prepared for workover
- Hydraulic tongs, equipment, and services
- Spear and fishing equipment services

Regulatory Requirements National Environmental Policy Act (NEPA) Implementing Procedures (10 Code of Federal Regulations (CFR) 1021)

10 CFR 1021.410 (Application of Categorical Exclusions)

- (a) The actions listed in Appendices A and B of Subpart D are classes of actions that Department of Energy (DOE) has determined do not individually or cumulatively have a significant effect on the human environment (categorical exclusions).
- (b) To find that a proposal is categorically excluded, DOE shall determine the following:
 - (1) The proposed action fits within a class of actions that is listed in Appendix A or B of Subpart D;
 - (2) There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal; and
 - (3) The proposal is not "connected" (40 CFR 1508.25(a)(1)) to other actions with potentially significant impact, is not related to other proposed actions with cumulatively significant impacts (40 CFR 1508.25(a)(2)), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211.

Appendix B (Categorical Exclusions Applicable to Specific Agency Actions)

The proposed action must not:

- 1. Threaten a violation of statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE and/or Executive Orders;
- 2. Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), but the proposal may include categorically excluded waste storage, disposal, recovery, or treatment actions or facilities;
- 3. Disturb hazardous substances, pollutants, contaminants, or Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)-excluded petroleum and natural gas products that preexist in the environment such that would be uncontrolled or un-permitted releases;
- 4. Have the potential to cause significant impacts on environmentally sensitive resources, which includes (i) property (sites, buildings, structures, and objects) of historical, archeological, or architectural significance; (ii) federally-listed and state-listed threatened or endangered species or their habitat, federally-protected marine mammals and essential fish habitat and otherwise federally-protected species; (iii) floodplains and wetlands; (iv) federally and state designated areas (wilderness areas, national parks, national monuments, national natural landmarks, wild and scenic rivers, wildlife refuges, scenic areas, and marine sanctuaries); (v) prime or unique farmland; (vi) special sources of water (sole-source aquifers, wellhead protection areas, and other vital water resources); and (vii) tundra, coral reefs, or rain forests); or
- 5. Involve genetically engineered organisms, synthetic biology, governmentally designated noxious

RECORD OF CATEGORICAL EXCLUSION DETERMINATION

Page 2 of 2

Project ID No. SPR Workover Services Contract

weeds, or invasive species.

NEPA Preparer: Matthew Dubuc Creation Date: 12/19/2019

Environmental Analysis: (mark all environmental aspects that are applicable to this project)

Air Emissions		Environmental Monitoring		Fire	
Green Procurement		Project Design		Waste	Х
Spills/Releases	Χ	Cavern Integrity		Discharges	
Energy Use		Natural Resource Conservation		Water Use	
Transportation		Chemical Use/Selection	Χ	Public Involvement	
Sustainable Building		Electronic Stewardship		Wetlands Permitting	
Clean Water		Pollution Prevention			

Categorical Exclusion (CX) Determination

NEPA review suggests this project is a Categorical Exclusion. This suggestion is based on review of the project description. If there are changes in the scope of this project additional NEPA review may be required.

CX to be applied A8

Award of contracts for technical support services, management and operation of a government-owned facility and personal services.

CX to be applied B5.12

Workover (operations to restore production, such as deepening, plugging back, pulling and resetting lines, and squeeze cementing) of existing wells (including, but not limited to, activities associated with brine, carbon dioxide, coalbed methane, gas hydrate, geothermal, natural gas, oil) to restore functionality, provided that workover operations are restricted to the existing wellpad and do not involve any new site preparation or earthwork that would have the potential to cause significant impacts on nearby habitats; that sit characterization has verified a low potential for seismicity, subsidence, and contamination of freshwater aquifers; and he actions are otherwise consistent with best practices and DOE protocols, including those that protect against uncontrolled releases if harmful materials.

NEPA Approval

Based on my review of information conveyed to me and in my possession the proposed action, as NEPA Compliance Officer (as authorized under DOE Order 451.1) I have determined that the proposed action fits within the specified actions, the other regulatory requirements set forth above are met, and the action is hereby excluded from further NEPA review.

Approved By

DOE NEPA Compliance Officer

<u>Stephen Reese</u>

NEPA Review Summary

 Created By:
 Dubuc, Matthew

 Date NEPA Review Initiated:
 12/19/2019

 Type of NEPA Review:
 Type B

 Project ID Number:
 SPR Workover Services Contract

 Title:
 SPR Site Support Workover Activities

 Workflow Status:
 Approved

If Workflow Status is Rejected, see below for Reason:

Concurrence Details:

<u>Auger, Jennifer</u> 12/23/2019

FFPO Environmental Concurrence Compliance Date

(not required for Type A-DOE Only Record of NEPA Review or Type B-DOE Only Record of Categorical Exclusion Determination)

Crosby, Thomas 12/19/2019

SPR Derivative Classifier Compliance Date

(only required for Type B)

Woods, Will 1/6/2020

DOE ES&H Director (or Acting) Compliance Date

(only required for Type B & Type A-DOE Only

Record of NEPA Review)

Reese, Stephen 1/6/2020

DOE NEPA Compliance Officer (or

Acting)

Compliance Date

ALL SIGNATURES WERE CAPTURED VIA THE ELECTRONIC WORKFLOW SYSTEM.

Click on the following Link to view the associated NEPA Document:

https://myspr.spr.doe.gov/sites/sprworkflow/nepa/NEPA Uploaded Documents/Site Support Workover Activities.docx, NEPA Doc Lin