



U.S. Department of Energy Categorical Exclusion Determination Form

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Proposed Action Title: National Renewable Energy Laboratory -- RIGS UP: Repurposing Infrastructure for Gravity Storage using Underground Potential energy

Program or Field Office: Advanced Research Projects Agency - Energy

Location(s) (City/County/State): Golden, Colorado; Sanger, Texas; Bakersfield, California (Lat: 35.61228260, Long: -119.72094150)

Proposed Action Description:

Funding will support the project team's small-scale research and development of a long-term energy storage technology for use within inactive upstream oil and gas wells. Specifically, the project team will (1) research abandoned oil and gas wells and collect data to identify appropriate design parameters and develop a model of in-well design for the Repurposing Infrastructure for Gravity Storage using Underground Potential energy "RIGS UP" technology, (2) test and verify the model for scaling to full size design, and (3) build, field test, and redesign full-scale prototypes of RIGS UP for optimal function. If successful, this project will enable the project team to plug abandoned oil and gas wells resulting in both reduced methane emissions and long-term storage of energy generated by renewable sources.

Project activities will be conducted at existing facilities at National Renewable Energy Laboratory (NREL) (Golden, CO), Renewell (Sanger, TX), and on private property (Bakersfield, Kern County, CA [Lat: 35.61228260, Long: -119.72094150]) designed for the applicable activities. Project tasks will be conducted in accordance with established safety and materials/waste management protocols and pursuant to applicable Federal, State, and local regulatory requirements. NREL has not obtained all necessary permits and approvals for the activities planned in project milestones 2.2 and 2.5, including electrical modifications, construction, conditional use, and for the California Environmental Quality Act. The project team is prohibited from commencing milestones 2.2 and 2.5 before (1) obtaining the necessary permits and approvals and (2) providing written assurances to ARPA-E of the same

Categorical Exclusion(s) Applied:

- B3.6 - Small-scale research and development, laboratory operations, and pilot projects
- B3.11 - Outdoor tests and experiments on materials and equipment components
- B5.12 - Workover of existing wells

For the complete DOE National Environmental Policy Act regulations regarding categorical exclusions, including the full text of each categorical exclusion, see Subpart D of [10 CFR Part 1021](#).

Regulatory Requirements in 10 CFR 1021.410(b): (See full text in regulation)

The proposal fits within a class of actions that is listed in Appendix A or B to 10 CFR Part 1021, Subpart D.

To fit within the classes of actions listed in 10 CFR Part 1021, Subpart D, Appendix B, a proposal must be one that would not: (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE 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 CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases; (4) have the potential to cause significant impacts on environmentally sensitive resources, including, but not limited to, those listed in paragraph B(4) of 10 CFR Part 1021, Subpart D, Appendix B; (5) involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those listed in paragraph B(5) of 10 CFR Part 1021, Subpart D, Appendix B.

There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal.

The proposal has not been segmented to meet the definition of a categorical exclusion. This proposal is not connected to other actions with potentially significant impacts (40 CFR 1508.25(a)(1)), is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1508.27(b)(7)), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211 concerning limitations on actions during preparation of an environmental impact statement.

Based on my review of the proposed action, as NEPA Compliance Officer (as authorized under DOE Order 451.1B), I have determined that the proposed action fits within the specified class(es) of action, the other regulatory requirements set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.

NEPA Compliance Officer:

Approved via email

Date Determined: 06/06/2022