Department of Conservation, Division of Oil, Gas, and Geothermal Resources
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STATE OF CALIFORNIA

NATURAL RESOURCES AGENCY

DEPARTMENT OF CONSERVATION

DIVISION OF OIL, GAS, AND GEOTHERMAL RESOURCES

ORDER TO PERFORM

REMEDIAL WORK, NO. 1168

Operator: Griffin Resources, LLC (G3583)

McKittrick Fee Lease in McKittrick Field:
Well 17R (API 029-35319), Well 24 (API 029-35326), Well 2 (API 029-35302),
Tanks (9778, 9779, 9809, 103S), and
Sumps Associated with the McKittrick Fee Lease

Villard Lease in Mount Poso Field:
Well #1 (API 029-12087), Well #2 (API 029-12088),
Tank #4, Tank #5S615, and
Sumps 370' N of Well #6, Sump 460' N of Well #6

Poscal Lease in Mount Poso Field:
Well #1 (API 029-12098), Well #3 (API 029-12100), Well #7 (API 029-66925), Well #8 (API 029-69621), Well #9 API (029-69622), Well #10 (API 029-74823), Well #11 (API 029-62384), Well #14 (API 029-61447), Well #22 (API 029-62385), and
Tanks 20S351, Tank Poscal 3,

Pacific Lease in Mount Poso Field:
Well #1 (API 029-12089), Well #2 (API 029-12099), Well #6 (API 029-58874),
Tank #1, Tank #10S662, and

Pipeline at +35.630887, -118.958444

Mountain View Frick Lease in Mountain View Field:
Tank located at approximately +35.245095, -118.870066

C.C.M.O. Lease in Pyramid Hills Field
Tank Facility at approximately +35.833421, -120.050017

I. Introduction

The State Oil and Gas Supervisor (Supervisor), acting through the Division of Oil, Gas, and Geothermal Resources (Division) and under the authority of Division 3 of the Public Resources Code (PRC; commencing with PRC section 3000) and title 14 of the California Code of Regulations (Regulations), may order tests and remedial work concerning oil and natural gas field operations which, in his judgment, are necessary to prevent damage to life, health, property, and natural resources (See PRC sections 3106 and 3224).

At all times relevant to this Order, Griffin Resources, LLC. has been identified as the "operator" (Operator), as defined in PRC section 3009, of the "well(s)" as defined in PRC section 3008, subdivision (a), and is conducting "operations" as defined in Regulations section 1720, subdivision (f).

II. Definitions

PRC section 3008, subdivision (a), defines "Well" to mean, among other things, "any oil or gas well or well for the discovery of oil or gas; any well on lands producing or reasonably presumed to contain oil or gas," and "any well drilled for the purpose of injecting fluids or gas for stimulating oil or gas recovery[.]"

PRC section 3009 defines "Operator" to mean "a person who, by virtue of ownership, or under the authority of a lease or any other agreement, has the right to drill, operate, maintain, or control a well or production facility."

PRC section 3010 defines production facility to mean "any equipment attendant to oil and gas production or injection operations[.]"

Regulations section 1720, subdivision (f), defines "Operations" to mean "any one or all of the activities of an operator covered by Division 3 of the Public Resources Code."

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III. Statutory and Related Authority

PRC section 3013 states that the oil and gas conservation laws (Division 3 of the PRC, commencing with § 3000) "shall be liberally construed to meet its purposes" and grants the Supervisor "all powers" that may be necessary to carry out those purposes.

PRC section 3106, subdivision (a), authorizes the Supervisor to "supervise the drilling, operation, maintenance, and abandonment of wells and the operation, maintenance, and removal or abandonment of tanks and facilities attendant to oil and gas production … so as to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil and gas deposits from infiltrating water and other causes; losses of oil, gas, or reservoir energy, and damage to underground and surface waters suitable for irrigation or domestic purposes by the infiltration of, or the addition of, detrimental substances."

PRC section 3270 requires the Division, by regulation, to prescribe minimum facility maintenance standards for all product facilities in the state. The regulations shall include "other facility or equipment maintenance that the supervisor deems important for the proper operation of production facilities and that the supervisor determines are necessary to prevent damage to life, health, property, and natural resources[.]"

PRC section 3224 authorizes the Supervisor to order "remedial work as in his judgment are necessary to prevent damage to life, health, property, and natural resources[.]"

PRC section 3226 states: "[I]f the supervisor determines that an emergency exists, the supervisor may order or undertake the actions he or she deems necessary to protect life, health, property, or natural resources." PRC section 3226 also allows the Supervisor, based the Supervisor's final or affirmed order, to appoint agents to enter the premises and perform necessary remedial work if the operator did not complete the remedial work as ordered. Any amount the Supervisor expends to complete the necessary remedial work constitutes a lien against the operator's real or personal property according to PRC section 3423.

Regulations section 1714 states: "[T]emporary approval to commence . . . operations may be granted by the Supervisor or a representative of the Supervisor when such operations are necessary to avert a threat to life, health, property, or natural resources."

Regulations section 1722, subdivision (a), requires that an Operator to conduct all operations "in accordance with good oilfield practice."

Regulations section 1770 (b) requires sumps to be designed, constructed, and maintained so as to not be a hazard to people, livestock, or wildlife including birdlife. The Regulations further require sumps in urban areas shall be enclosed in accordance with Section 1778 (a) or (e) and (c). The Regulations require that sumps in non-urban areas, to protect people and livestock and to deter wildlife, have an enclosure shall be constructed around sumps in accordance with Section 1778 (b) or (e). Any sump, except an operations or drilling sump, which contains oil or a mixture of oil and water shall be covered with screening to restrain entry of wildlife in accordance with Section 1778(d). A sump need not be individually fenced if the property or the production facilities of which the sump is a part is enclosed by proper perimeter fencing.

Regulations section 1773.1(c) requires Secondary containment be capable of confining liquid for a minimum of 72 hours.

Regulations section 1773.3 requires all tanks be properly identified with the operator's tank identification number, tank type (production, stock, water, etc.), and with appropriate materials hazard placards or labels. Additionally, Operators shall inspect in-service tanks at least once a month for the following:

(1) Leakage at the base, seams, associated piping, tank shell plugs, or any other fitting that could leak.

(2) The presence of corrosion or shell distortions.

(3) The general condition of the foundation, including any signs of settling or erosion that may undermine the foundation.

(4) The condition of paint coatings, insulation systems and tank grounding system components, if present.

Leaking tanks shall be reported to the appropriate Division district office within 48 hours and shall be taken out of service and designated as an Out-of-Service tank.

Regulations section 1773.5(a) requires, within six months after the determination that a production facility is Out-of-Service, the following:

(1) Out-of-Service production facilities shall have fluids, sludge, hydrocarbons, and solids removed and shall be disconnected from any pipelines and other in-service equipment.

(2) Out-of-Service production facilities shall be properly degassed in accordance with local air district requirements.

(3) Clean-out doors or hatches on Out-of-Service tanks shall be removed and a heavy gauge steel mesh grating (less than 1" spacing) shall be secured over the opening to allow for visual inspection and prevent unauthorized access.

(4) Out-of-Service tanks and vessels shall be labeled with Out-of-Service or OOS. "Out-of-Service" or "OOS" shall be painted in bold letters at least one foot high, if possible, on the side of the tank or vessel at least five feet from the ground surface, or as high as possible, along with the date it was taken out of service.

(5) Out-of-Service production facilities shall have valves and fittings removed or secured to prevent unauthorized use.

(6) Pipelines associated with Out-of-Service tanks and pressure vessels shall be removed or flushed, filled with an inert fluid, and blinded.

(b) Out-of-Service production facilities shall not be reactivated unless all needed repairs have been completed and the production facility is in compliance with all applicable testing and inspection requirements.

Regulations section 1774 states: Newly installed pipelines shall be designed, constructed, and all pipelines shall be tested, operated, and maintained in accordance with good oil field practice and applicable standards in California Code of Regulations, title 8, section 6533, or other methods approved by the Supervisor. The Supervisor may require design or construction modifications, and/or additional testing and maintenance if he or she determines that good oil field practices and applicable standards have not been used.

Good oilfield practice includes, but is not limited to:

(a) Utilization of preventative methods such as cathodic protection and corrosion inhibitors, as appropriate, to minimize external and internal corrosion.

(b) Utilization of pipeline coating or external wrapping for new or replaced buried or partially buried pipelines to minimize external corrosion. The coating or external wrapping should have a high electrical resistance, be an effective moisture barrier, have good adhesion to the pipe, and be able to resist damage during handling.

(c) Employment, where practical, of equipment such as low-pressure alarms and safety shut-down devices to minimize spill volume in the event of a leak.

(d) If feasible, locating above ground, preferably on supports or racks, any new pipelines or parts of a pipeline system that are being relocated or replaced.

Regulations section 1774.1 states:

(a) Operators shall visually inspect all aboveground pipelines for leaks and corrosion at least once a year.

(b) Operators shall inspect all active gas pipelines in sensitive areas that are 10 or more years old for leaks or other defects at least once a year, or at a frequency approved by the Supervisor and listed in the operator's Pipeline Management Plan. The operator shall conduct the inspection in accordance with applicable regulatory standards or, in the absence thereof, an accepted industry standard that is specified by the operator and listed in the Pipeline Management Plan.

(c) The Supervisor may order such tests or inspections deemed necessary to establish the reliability of any pipeline system. Repair, replacement, or cathodic protection may be required.

(d) Operators shall conduct pressure testing in accordance with subdivision (f)(2) on any pipeline that has had a leak resulting in the release of a fluid in a quantity that triggers reporting of the release under any regulatory, statutory, or other legal requirement. The pipeline shall not be returned to service unless the pressure testing has been successfully completed. Test results shall be provided to the Division for review within seven days following the test.

(e) Pipe clamps, wooden plugs or screw-in plugs shall not be used for permanent repair of pipeline leaks.

(f) The operator shall perform periodic mechanical integrity testing on all active environmentally sensitive pipelines that are gathering lines, and all urban pipelines over 4″ in diameter, and all active gas pipelines in sensitive areas. The mechanical integrity testing shall be

conducted every two years, or at an alternative frequency approved by the Supervisor based on demonstrated wall thickness and remaining service life over a period of at least two years. The testing frequencies shall be specified in the operator's Pipeline Management Plan. Pipelines less than 10 years old are exempt from the testing requirements of this subdivision. Subject to review and approval by the Division, the operator shall identify effective mechanical integrity testing methods based on pipeline type and use. The mechanical integrity testing methodology for compliance with this subdivision shall be specified in the operator's Pipeline Management Plan and shall include at least one of the following:

(1) Nondestructive testing using ultrasonic or other techniques approved by the Supervisor, to determine wall thickness;

(2) Pressure testing using:

(A) The guidelines recommended by industry standards, such as the American Petroleum Institute, American Society of Mechanical Engineers for oil or gas pipelines; or

(B) The method approved by the State Fire Marshal, Pipeline Safety Division for liquid pipelines or US Department of Transportation, Pipeline and Hazardous Materials Safety Administration for gas pipelines.

(3) Internal inspection devices such as a smart pig, as approved by the Supervisor; or

(4) Any other method approved by the Supervisor that ensures mechanical integrity so as to protect life, health, property, and natural resources.

Copies of mechanical integrity test results shall be maintained in a local office of the operator for ten years and made available to the Division, upon request. The operator shall assess all test results to determine continued safe operations and that risks identified in the Pipeline Management Plan are adequately addressed. The operator shall repair and retest or remove from service any pipeline that fails the mechanical integrity test. The operator shall promptly notify the Division in writing of any pipeline taken out of service due to a test failure.

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(g) Vapor recovery pipelines are exempt from mechanical integrity testing under subdivision (f) if they are equipped with safeguards, such as oxygen detectors and are leak tested at least annually. The operator shall document the safeguards and inspection regime in its Pipeline Management Plan.

(h) A county board of Supervisors, a city council, or another state agency may petition the Supervisor to include other pipelines within their jurisdiction as environmentally sensitive or within a sensitive area. The request must be in writing and based on findings of a competent, professional evaluation that shows there is a probability of significant public danger or environmental damage if a leak were to occur.

(1) Within 30 days of receipt of a petition, the Supervisor shall notify any affected operator.

(2) Within 60 days of notification to the operators, the Supervisor shall schedule a hearing with the petitioner and operators to allow all parties to be heard.

(3) Within 30 days after the conclusion of the hearing, the Supervisor shall make a determination as to whether the areas or pipelines should be considered environmentally sensitive.

(i) For pipelines that are subject to mechanical integrity testing under subdivision (f), but that were not subject to mechanical integrity testing under subdivision (f) prior to January 1, 2018, mechanical integrity testing is not required to be completed until January 2, 2020. For these pipelines, mechanical integrity testing shall be scheduled, completed, and mechanical integrity test results documented per subdivision (f) prior to January 2, 2020.

Regulations section 1775, subdivisions (a) and (c), requires Operator to address oilfield wastes, harmful chemicals, unused equipment, scrap and other trash so as not to cause damage to life, health, property, freshwater aquifers or surface waters, other natural resources, or such that its operations become a public nuisance or a menace to public safety. Unused equipment and scrap attendant to oilfield operations shall be removed from a production or injection operations area and/or stored in such a manner as to not cause damage to life, health, or property, or become a public nuisance or a menace to

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public safety. Trash and other waste materials attendant to oilfield operations shall be removed and disposed of properly.

Regulations section 1777, subdivision (a), requires, among other things, that Operators maintain production facilities in good condition and in a manner to prevent leakage or corrosion and to safeguard life, health, property, and natural resources.

Regulations section 1777(c)(2) requires weeds and debris be removed from secondary containment areas or catch basins, and the integrity of all berms shall be inspected monthly. Fluids, including rainwater, shall be removed.

Regulations section 1777, subdivision (c)(3), requires well cellars to be covered and kept drained. Grating or flooring shall be installed and maintained in good condition so as to exclude people and animals. Cellars should be protected from as much runoff water as practical.

Regulations section 1777(d), requires all equipment and facilities in urban areas be enclosed individually or with perimeter fencing in accordance with Section 1778(a) or Section 1778(e) where it is necessary to protect life and property. Enclosures in nonurban areas are to be constructed in accordance with Section 1778(a) or Section 1778(b) where necessary to protect life and property.

Regulations section 1778 provides enclosure specifications as follows:

(a) Chain link fences. All chain link fences shall be constructed to meet the following specifications:

(1) Fences shall be not less than 5 feet high and mounted on 1 1/4" diameter steel posts with at least three strands of barbed wire mounted at a 45-degree angle from the top of the fence.

(2) The fence shall be constructed of chain link or other industrial-type fencing of not less than 11-gauge wire and of not greater than 2-inch nominal mesh.

(3) Supporting posts shall be securely anchored to the surface, spaced no more than 14 feet apart. Provisions for removable posts may be approved provided that the anchoring device is an integral part of the fence.

(4) Tension wires of at least No. 9 gauge coil spring wire, or equivalent, shall be stretched at the top and bottom of the fence fabric and shall be fastened to the fabric at

24-inch intervals. There shall be no aperture below the fence large enough to permit any child to crawl under.

(b) Wire fences. All wire fences shall be constructed to meet the following specifications:

(1) There shall be either: (1) four strands of barbed wire spaced 12 inches between strands and maintained with sufficient tension to preclude sagging; or (2) commercial livestock wire netting with a minimum height of 4 feet and sufficient tension.

(2) Posts may be of any material of sufficient strength and rigidity to support the wire and restrain people or livestock from pushing them over. Posts shall be set no more than 10 feet apart and buried at least 12 inches into the ground.

(c) Gates. Gates shall be of a structure substantially the same as the required fences and shall be kept secured when not attended by an adult.

(d) Screening. All screening to cover sumps shall meet the following specifications:

(1) Be not greater than 2-inch nominal mesh.

(2) Be of sufficient strength to restrain entry of wildlife.

(3) Be supported in such a manner so as to prevent contact with the sump fluid.

(e) Other Types of Materials. Any material that can be used effectively to restrict access may be substituted for the materials indicated in (a), (b), (c), and (d), if approved by the Supervisor.

Regulations section 1779 authorizes the Supervisor in individual cases to set forth other requirements where justified or called for.

IV. Alleged Acts/Omissions

During inspections on or about June 26, 2018, February 5, 2019, and/or August 9, 2019, Division staff observed the following conditions during one and/or all inspections at the Operator's facility associated with the McKittrick Fee Lease:

i. Tank 9779 – Leaking (See Administrative Record 1)

ii. Tank 9809 – Leaking (See Administrative Record 2)

iii. Tank 9778 – Unmet Out of Service Standards (See Administrative Record 5)

iv. Tank 103S – Unmet Out of Service Standards (See Administrative Record 4)

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v. Tank, Unknown Tank Name, located at 35.3193345, -119.6670467 – Unmet Out of Service Standards (See Administrative Record 3)

vi. Well 17R (API 0402935319) – Leaking (See Administrative Record 6)

vii. Well 24 (API 0402935326) – Leaking (See Administrative Record 7)

viii. Well 2 (API 0402935302) – Leaking (See Administrative Record 8)

ix. Sump Pond 1 / Robertson Sump located at or near +35.319555, -119.666788 – Previous unauthorized discharge (See Administrative Record 9)

x. Sump Pond 1 – Holes in netting (See Administrative Record 10)

xi. Sump Pond 4 – Holes in netting (See Administrative Record 11)

Associated with the Frick Lease in Mountain View Field:

xii. During an inspection of the Frick Lease in Mountain View Field on January 29, 2019, Division staff observed Out of Service standards were unmet and the berm around the tank was inadequate (See Exhibit 12)

Associated with the Mount Poso Field:

xiii. During inspections in March 19, 2019, Division staff observed the conditions associated with the Villard, Poscal, and Pacific Leases in the Mount Poso Field as referenced in the Notice of Violation dated April 8, 2019 (attached as Exhibit 13).

Associated with the C.C.M.O. Lease in Pyramid Hills Field:

xiv. During an inspection of the C.C.M.O. Lease in Pyramid Fields on July 17 2019, Division staff observed the following conditions during one and/or all inspections at the Operator's facility associated with the C.C.M.O. Lease as referenced in the Notice of Violation dated July 22, 2019 (attached as Exhibit 14)

i. Well 60-17 flow line – Leaking (Exhibit 15 & Exhibit 16)

ii. Tank facility at approximately +35.833421, -120.050017 – Leaking (Exhibit 17)

V. Required Remedial Actions

For the reasons described above in this Order, the Supervisor hereby determines that remedial work is necessary to prevent damage to life, health, property, and natural resources. Therefore, pursuant to PRC sections 3013, 3106, 3222, 3224, and 3226, and Regulations sections 1714, 1722, subdivision

(a), 1775, and 1777, among others, **the Supervisor hereby orders Operator, Griffin Resources, LLC., within ten days of the date this Order is signed by the Supervisor, to submit a workplan to correct referenced violations for review and approval by the Inland District Office:**

A. McKittrick Fee Lease: Tank 9779, Tank 9809, Well 17R, Well 24, Well 2, and Sump Pond 1 / Robertson Sump located at or near +35.319555, -119.666788

Villard Lease: Well #2

Poscal Lease: Well #1, Well #2, Well #3, Well #7, Well #9, Well #11, Well #21,

Pacific Lease: Well #1, Tank #10S662, Tank #1

1. Repair leaks, cease unauthorized discharges, remove and properly dispose of any contaminated soil and/or oil buckets attributed to the leaking tanks.

B. McKittrick Fee Lease: Tank 9778, Tank 103S, and Unknown Tank Name, located at 35.3193345, -119.6670467

Villard Lease: Tank #4 and Tank #5S615

Mountain View Frick Lease: Tank

C.C.M.O. Lease in Pyramid Hills Field: Tank Facility at approximately +35.833421, -120.050017

1. Comply with Out of Service Requirements in a manner consistent with Regulations section 1773.5.
2. Install secondary containment at facility, in if service consistent with Regulations section 1773.1(c).

C. McKittrick Fee Lease: Well 2 (API 402935302)

Poscal Lease: Poscal 20S351 Tank, Poscal 3

1. Drain cellar and implement a monitoring and maintenance plan to ensure that the cellar remains free from fluid consistent with Regulations section 1777(c)(3). Install grating on openings and ensure any leaks at the facility are properly repaired.

D. Poscal Lease: Well #14, Well #22

1. Install bull plugs on pipes coming from the wellhead consistent with Regulations section 1777(a) which requires operators to maintain production facilities in good

condition and in a manner to prevent leakage or corrosion and to safeguard life, health, property, and natural resources.

E. Poscal Lease: Well #11, Well #14, Well #1, Well #7, Well #8, Well #10

1. Install a belt guard consistent with Regulations section 1722 which requires all operations to be conducted in accordance with good oilfield practices.

F. McKittrick Fee Lease: Sump Pond 1 and Sump Pond 4

Villard Lease: Well #1, Sump 370'N of Well #6, and Sump 460' N of Well #6

Pacific Lease: Well #1, Well #16, Well #4

Poscal Lease: Well #2, Well #6

1. Repair enclosure and perimeter fencing consistent with requirements in Regulations sections 1777(d) and 1778.

G. Pacific Lease in Mount Poso Field: Pipeline at 35.630887, -118.958444

1. Repair pipeline in a manner consistent with good oil field practice pursuant to Regulations section 1774. The use of pipe clamps, wooden plugs, or screw-in plugs shall not be used for permanent repair of pipeline leaks per Regulations section 1774.1(e).
2. All leaking tanks shall be placed Out of Service (OOS). The OOS tanks shall not be reactivated unless all required repairs and testing have been competed according to CCR 1773.5.

The workplan shall be submitted to:

Rohit Sharma, PhD
Senior Oil and Gas Engineer, Inspections Supervisor
Division of Oil, Gas, and Geothermal Resources
4800 Stockdale Hwy., Suite 100
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VI. Operator's Appeal Rights

A notice of appeal must be timely made, in writing, and filed with the Director. (See PRC beginning at PRC section 3350.) If this Order is mailed to you, the Director must receive the appeal

within (15) days from the date the Supervisor mails the Order. To file an appeal, a written notice of appeal may be sent via U.S. mail to:

Department of Conservation
Director's Office of Appeals
801 K Street, MS 24-03 (Legal Office, Chief Counsel)
Sacramento, California 95814-3530

Or via electronic mail:

Appeals.DOGGR@conservation.ca.gov

(Attached is a voluntary form for such a written appeal.)

If Operator does not file a timely written notice of appeal, this Order will become a final order and the Division may contract for performance of the work, pursuant to PRC section 3226, if, within 30 days of this Order, Operator has not, in good faith, commenced the work ordered. Any costs incurred by the Supervisor to obtain compliance with this Order (which may include penalties and interest) will constitute a lien against Operator's real or personal property per PRC section 3423.

If Operator submits a timely written notice of appeal, it, and interested parties, will receive notice of the appeal hearing date, time, and place. Following the hearing, Operator, and interested parties, will receive a written decision that affirms, sets aside, or modifies the appealed order.

If the work is not immediately commenced upon approval of the workplan and continued to completion within 30 days after the remediation work commences, the Supervisor may appoint necessary agents to enter the premises and perform the work consistent with PRC section 3226. Any amount the Supervisor expends will constitute a lien against Operator's real and/or personal property. (PRC, § 3226.) Upon completion of the work, contact Mr. Sharma, to inspect the work performed and verify compliance with this order.

VII. Court Order and Other Potential Actions to Enforce This Order

PRC section 3236 makes it a misdemeanor for any person who violates, fails, neglects, or refuses to comply with any of the provisions of the oil and gas conservation laws commencing at PRC section 3000. The misdemeanor is punishable by a fine of not less than one hundred dollars ($100) nor more than one thousand dollars ($1,000), or by imprisonment not exceeding six months, or by both the fine

and imprisonment for each separate offense. PRC section 3359 makes it a misdemeanor to fail or neglect to comply with an order of the Supervisor. Each day's further failure, refusal, or neglect is a separate and distinct offense. (PRC, § 3359.)

Failure to comply with Section V (Required Remedial Actions) could result in additional enforcement orders and/or actions by the Division or other entities. For example, the Supervisor could deny approval of proposed well operations until compliance is achieved, order the plugging and abandonment of the associated well, and/or assess a civil penalty. (PRC, §§ 3203, subd. (c), 3236.5, 3237, subd. (a)(3)(C).)

Dated: 12/20/19

Uduak-Joe Ntuk
State Oil and Gas Supervisor

ATTACHMENTS