

1 Department of Conservation, Geologic Energy Management Division
Doug Ito
2 STATE OIL AND GAS SUPERVISOR
715 P Street, MS 19-06 (Legal Office)
3 Sacramento, California 95814
Telephone (916) 323-6733
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8 **STATE OF CALIFORNIA**
9 **NATURAL RESOURCES AGENCY**
10 **DEPARTMENT OF CONSERVATION**
11 **GEOLOGIC ENERGY MANAGEMENT DIVISION**
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14 **ORDER TO PLUG AND ABANDON WELLS, DECOMMISSION**
15 **ATTENDANT FACILITIES, AND RESTORE WELL SITE**
16 **NO. 1595**
17

18 **Operator: Tetra Oil Company (T1525)**
19 **Fields: Kern Front and Poso Creek**
20 **Central District, Kern County**
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I. Introduction

The State Oil and Gas Supervisor (**Supervisor**), acting through the Geologic Energy Management Division (**CalGEM**), and under the authority of Division 3 of the Public Resources Code (PRC) (commencing with PRC section 3000) and California Code of Regulations, Title 14 (**Regulations**), may order the plugging and abandonment of a well or the decommissioning of a production facility that has been deserted, whether or not any damage is occurring, or threatened, by reason of that deserted well or production facility. (PRC, § 3237, subd. (a).) An operator's failure to submit an idle well Testing Compliance Work Plan, failure to meet the testing benchmarks of an idle well Testing Compliance Work Plan, or failure to remediate any idle well in accordance with Regulations section 1772.1, subdivision (b), is conclusive evidence of desertion. (PRC, § 3206.1, subds. (d)-(e).)

At all relevant times, Tetra Oil Company (**Operator**) has been the "operator" (as defined in PRC section 3009) of the idle wells (the **Wells**) and the production facilities attendant to the Wells (the **Facilities**), described in **Attachment A**, incorporated herein. As described in more detail below, based on conclusive evidence, the Supervisor has determined that Operator has deserted the Wells. As a result, Operator is responsible for the plugging and abandonment of the Wells, the decommissioning of the Facilities, and the restoration of the well site for the Wells. (PRC, § 3237, subd. (c)(1).)

Therefore, pursuant to PRC sections 3106, 3206.1, 3224, 3226, and 3237, the Supervisor is ordering Operator to plug and abandon the Wells, decommission the Facilities, and restore the well site for the Wells, consistent with all applicable requirements, including PRC sections PRC sections 3208, 3224, 3228, 3229, and 3230; Regulations sections 1722, 1723 through 1723.8, 1724 through 1724.1, 1760, 1775, and 1776; and the conditions included in any permit or approval CalGEM may issue pursuant to PRC section 3229; and until that work is complete, perform remedial work and testing as necessary to prevent damage to life, health, property, and natural resources.

Attachment B, incorporated herein, contains a list of definitions and authorities that are applicable to this Order.

II. Conclusive Evidence of Desertion

PRC section 3206.1, subdivision (e), provides that failure "to comply with the requirements of the regulations implementing this section [e.g., Regulations sections 1772.1, subdivisions (a) and (b), 1772.1.4, subdivisions (a) and (b).] shall be conclusive evidence of desertion of the well, permitting the supervisor to order the well abandoned pursuant to Section 3237."

The Wells have been designated as idle by CalGEM as outlined in the table below. Therefore, at all times relevant to this Order, the Wells were each an idle well as defined in PRC section 3008, subdivision (d).

API	Well Designation	Idle Start Date
0402900887	Snow-G.P. 1	12/1/2020
0402900888	Snow-G.P. 2	12/1/2020
0402900889	Snow-G.P. 3	12/1/1986
0402900890	Snow-G.P. 4	1/1/1979
0402900891	Snow-G.P. 5	8/1/1980
0402916565	Cauley 1	12/1/2020
0402916566	Cauley 2	1/1/2018
0402916567	Cauley 3	4/1/2019
0402916568	Cauley 4	4/1/2019
0402916570	Cauley 6	3/1/2019

0402916571

Cauley 7

2/1/2017

Because the Wells were each an idle well, Operator was required to submit an idle well Testing Compliance Work Plan (TCWP) and comply with applicable idle well testing requirements. (Regulations, §§ 1772.1, 1772.1.4.) As indicated below, Operator failed to submit a TCWP or meet the testing requirements, providing conclusive evidence that the Wells are deserted. (PRC, § 3206.1, subd. (e).)

A. Failure to submit an Idle Well Testing Compliance Work Plan (TCWP) (Regulations, § 1772.1.4, subd. (a))

Regulations section 1772.1.4, subdivision (a), requires that an operator must submit an TCWP for all idle wells by June 1, 2019. To date, CalGEM has not received a TCWP from Operator for the applicable Wells in violation of Regulation section 1772.1.4, subdivision (a).

B. Failure to Meet Idle Well Testing Compliance Work Plan (TCWP) Benchmarks (Regulations, § 1772.1.4, subds. (a)-(b))

Regulations section 1772.1.4, subdivisions (a) and (b), provides that an operator must meet annual testing benchmarks under a TCWP. The casing pressure testing and performance of a clean out tag on each well, as required by the TCWP, were due starting April 1, 2020, as indicated in the table below. (Regulations, §§ 1772.1, subd. (a)(2)-(3), 1772.1.4, subds. (a)-(b).) To date, CalGEM has not received evidence of casing pressure testing or performance of clean out tags for any of the Wells due for testing in violation of Regulations section 1772.1.4, subdivisions (a) and (b).

API	Designation	Date pressure test due	Date cleanout tag due
0402900890	Snow-G.P. 4	4/1/2020	4/1/2020
0402900891	Snow-G.P. 5	4/1/2021	4/1/2021
0402900889	Snow-G.P. 3	4/1/2022	4/1/2022
0402916571	Cauley 7	4/1/2023	4/1/2023
0402916566	Cauley 2	4/1/2024	N/A

0402916570	Cauley 6	4/1/2024	N/A
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C. Failure To Conduct Fluid Level Testing (Regulations, § 1772.1, subd. (a)(1))

Within 24 months of a well becoming an idle well, the operator must conduct a fluid-level test for the well. (Regulations § 1772.1, subd. (a)(1).) However, a “well that became an idle well on or before April 1, 2019, is not required to have a fluid-level test under this section until April 1, 2021.” (*Id.*)

The fluid level testing for each of the Wells was due as follows:

API	Well Designation	Idle Date	Fluid Level Due Date
0402900887	Snow-G.P. 1	12/1/2020	12/1/2022
0402900888	Snow-G.P. 2	12/1/2020	12/1/2022
0402900889	Snow-G.P. 3	12/1/1986	4/1/2021
0402900890	Snow-G.P. 4	1/1/1979	4/1/2021
0402900891	Snow-G.P. 5	8/1/1980	4/1/2021
0402916565	Cauley 1	12/1/2020	12/1/2022
0402916566	Cauley 2	1/1/2018	1/1/2020
0402916567	Cauley 3	4/1/2019	4/1/2021
0402916568	Cauley 4	4/1/2019	4/1/2021
0402916570	Cauley 6	3/1/2019	3/1/2021

To date, CalGEM has not received evidence of fluid level testing on any of the Wells due for testing in violation of Regulations section 1772.1, subdivision (a)(1).

D. Failure To Conduct Casing Pressure Testing (Regulations, § 1772.1, subd. (a)(2))

Within 24 months of a well becoming an idle well, an operator must conduct a casing pressure test for the well. (Regulations § 1772.1, subd. (a)(2).) The casing pressure testing for each of the Wells was due as follows:

API	Well Designation	Test type	Test due date	Remediation due date
0402900887	Snow-G.P. 1	Casing pressure test	12/1/2022	12/1/2023
0402900888	Snow-G.P. 2	Casing pressure test	12/1/2022	12/1/2023
0402916565	Cauley 1	Casing pressure test	12/1/2022	12/1/2023
0402916567	Cauley 3	Casing pressure test	4/1/2021	4/1/2022
0402916568	Cauley 4	Casing pressure test	4/1/2021	4/1/2022

To date, CalGEM has not received evidence of casing pressure testing on any of the Wells due for testing in violation of Regulations section 1772.1, subdivision (a)(2).

E. Failure To Remediate After Failing to Successfully Complete Idle Well Testing (Regulations, § 1772.1, subd. (b))

Within 12 months of failing to conduct a successful casing pressure test or cleanout tag consistent with Regulations sections 1772.1, subdivision (a)(2) and (3), and 1772.1.4, subdivisions (a) and (b), an operator must do one of the following: (1) bring the well into compliance, (2) partially plug and abandon the well in accordance with Regulations section 1752, (3) plug and abandon the well in accordance with PRC section 3208, or (4) schedule the well for plugging and abandonment under an approved Idle Well Management Plan or an approved Testing Waiver Plan. (Regulations, § 1772.1, subd. (b).)

To date, CalGEM has not received evidence of a successful casing pressure test or cleanout tag for each of the Wells, as applicable. Therefore, Operator was required to perform remedial action in accordance with Regulations section 1772.1, subdivision (b). The applicable testing and remediation due dates for each of the Wells is as follows:

API	Well Designation	Test type	Test due date	Remediation due date
0402900887	Snow-G.P. 1	Casing pressure test	12/1/2022	12/1/2023

0402900888	Snow-G.P. 2	Casing pressure test	12/1/2022	12/1/2023
0402916565	Cauley 1	Casing pressure test	12/1/2022	12/1/2023
0402916567	Cauley 3	Casing pressure test	4/1/2021	4/1/2022
0402916568	Cauley 4	Casing pressure test	4/1/2021	4/1/2022
0402900890	Snow-G.P. 4	Casing pressure test	4/1/2020	4/1/2022
0402900891	Snow-G.P. 5	Casing pressure test	4/1/2021	4/1/2022
0402900889	Snow-G.P. 3	Casing pressure test	4/1/2022	4/1/2023
0402916571	Cauley 7	Casing pressure test	4/1/2023	4/1/2024
0402916566	Cauley 2	Casing pressure test	4/1/2024	4/1/2025
0402916570	Cauley 6	Casing pressure test	4/1/2024	4/1/2025
0402900890	Snow-G.P. 4	Cleanout tag	4/1/2020	4/1/2022
0402900891	Snow-G.P. 5	Cleanout tag	4/1/2021	4/1/2022
0402900889	Snow-G.P. 3	Cleanout tag	4/1/2022	4/1/2023
0402916571	Cauley 7	Cleanout tag	4/1/2023	4/1/2024

To date, Operator has not remediated any of the Wells in violation of Regulations section 1772.1, subdivision (b).

In conclusion, Operator failed to submit a TCWP, comply with the testing benchmarks of the TCWP, conduct idle well testing, and remediate the Wells as required. (PRC, §§ 3206.1,

subd. (e), 3237, subd. (a); Regulations, §§ 1772.1, subds. (a)(1)-(2), (b), and (d), 1772.1.4, subd. (b).) These idle well violations constitute conclusive evidence of desertion and permit the Supervisor to order the Wells be plugged and abandoned.

III. Operator's Required Actions

For the reasons stated herein, the Supervisor has determined that the Wells are deserted. Therefore, pursuant to PRC sections 3106, 3206.1, 3224, 3226, and 3237, **IT IS HEREBY ORDERED** that Operator plug and abandon the Wells, decommission the Facilities, and restore the well site for the Wells consistent with all applicable requirements of PRC sections 3208, 3224, 3228, 3229, and 3230; Regulations sections 1722, 1723 through 1723.8, 1724 through 1724.1, 1760, 1775, and 1776; and the conditions included in any permit CalGEM may issue pursuant to PRC section 3229. Until that work is complete, Operator is ordered to perform remedial work and testing on the Wells as necessary to prevent damage to life, health, property, and natural resources.

IV. Operator's Appeal Rights

Operator may appeal this Order by filing a timely written notice of appeal with the Director as described in Article 6 (Appeals and Review) of Division 3 of the PRC, commencing with PRC section 3350. (PRC, §§ 3225, subd. (d); 3236.5, subd. (c); 3237, subd. (b).) 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
715 P Street, MS 19-06 (Legal Office, Chief Counsel)
Sacramento, California 95814

Alternatively, a written notice of appeal may be sent via electronic mail to:

OfficeofAppeals@conservation.ca.gov

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

1 If Operator does not file a timely written notice of appeal, or if the order is affirmed
2 following an appeal, this Order will become a final order and CalGEM may contract for
3 performance of the work, pursuant to PRC section 3226, if, within 30 days of this Order,
4 Operator has not, in good faith, commenced the work ordered. Any costs incurred by
5 CalGEM to obtain compliance with this Order (which may include penalties and interest) will
6 constitute a lien against Operator's property per PRC section 3423. (PRC, § 3356.)

7 **V. Consequences of Non-Compliance**

8 Failure to comply with Section III (Operator's Required Actions) of this Order could
9 subject Operator to further enforcement action. PRC section 3236 makes it a misdemeanor for
10 any person who violates, fails, neglects, or refuses to comply with any of the provisions of the
11 oil and gas conservation laws commencing at PRC section 3000. PRC sections 3236.2 and
12 3236.3 authorizes the Supervisor to refer for civil penalties and injunctive relief for failure to
13 comply with an order or for violation of any provision in Chapter 1 of Division 3 of the PRC or
14 any regulation that implements those statutes. PRC section 3236.5 authorizes the Supervisor to
15 impose a civil penalty on a person who violates any provision in Chapter 1 of Division 3 of the
16 PRC or any regulation that implements those statutes, and the Supervisor may in the future
17 impose further civil penalties based on the facts and omissions underlying this Order. PRC
18 section 3237 authorizes the Supervisor to order the plugging and abandonment of a well or
19 the decommissioning of a production facility if an operator has failed to comply with an order
20 of the Supervisor within the time provided by the order or has failed to challenge the order on
21 a timely basis. PRC section 3359 makes it a misdemeanor to fail or neglect to comply with an
22 order of the Supervisor. Each day's further failure, refusal, or neglect is a separate and distinct
23 offense. (PRC, § 3359.) By issuance of this Order, the Supervisor does not waive the right to take
24 further enforcement actions. PRC sections 3236.2 and 3236.3 authorizes the Supervisor to seek
25 civil penalties and injunctive relief for failure to comply with an order or for violation of any
26 provision in Chapter 1 of Division 3 of the PRC or any regulation that implements those statutes.

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DATED: 2/5/2026

Lindsey Miller

Lindsey Miller
CalGEM Enforcement Chief, on
behalf of the State Oil and Gas
Supervisor