

1 Department of Conservation, Geologic Energy Management Division
2 Doug Ito
3 STATE OIL AND GAS SUPERVISOR
4 715 P Street, MS 19-06 (Legal Office)
5 Sacramento, California 95814
6 Telephone (916) 323-6733
7

8 **STATE OF CALIFORNIA**
9 **NATURAL RESOURCES AGENCY**
10 **DEPARTMENT OF CONSERVATION**
11 **GEOLOGIC ENERGY MANAGEMENT DIVISION**

12
13
14 **EMERGENCY ORDER TO PLUG AND ABANDON WELLS, DECOMMISSION ATTENDANT FACILITIES,**
15 **AND RESTORE WELL SITES**
16 **NO. 1618**

17
18 **Operator: Concordia Resources, Inc.**

19 **Field: Lindsey Slough Gas**

20 **County: Solano**
21
22
23
24
25
26
27
28

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 remedial work as in his judgment is necessary to prevent damage to life, health, property, and natural resources. (PRC, § 3224.) Upon the Supervisor's determination an emergency exists, the Supervisor may order or undertake the necessary actions to protect life, health, property, or natural resources. (PRC, § 3226, subd. (b).) Additionally, the Supervisor 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. (PRC, § 3237, subd. (a).) In determining whether a well and facility are deserted the Supervisor may consider the operational history of the well or production facility. (PRC, § 3237, subd. (a)(2).)

Based on CalGEM's records, Concordia Resources, Inc. (**Operator**) is the "operator" (as defined in PRC section 3009) of the wells "Highland-Willows" 4-12, API no. 0409520572 and "Akers" 1-12, API no. 0409520584 (collectively the **Wells**) described in **Attachment A**, incorporated herein, and is responsible (as specified in PRC section 3237, subdivision (c)(1)) for the plugging and abandonment of the Wells, the decommissioning of the production facilities attendant to the Wells, and the restoration of the well sites for the Wells. During a recent inspection, CalGEM determined that the Wells are leaking high concentrations of methane gas which constitutes a danger to the surrounding area, comprised of a residential development. Both of the Wells are idle and are located in a Health Protection Zone (as defined in PRC section 3280, subdivision (b)). "Akers" 1-12 is a critical well (as defined in Regulations section 1720, subdivision (a)) is located in an environmentally sensitive area (as defined in Regulations section 1760, subdivision (f)). CalGEM has determined, based on conclusive and credible evidence, that Operator has deserted the Wells, and is responsible (as specified in PRC section 3237, subdivision (c)(1)) for the plugging and abandonment of the Wells. CalGEM records indicate that, under applicable provisions of PRC sections 3206 and

1 3237, Operator has demonstrated evidence of desertion of the Wells in its failure to comply
2 with multiple provisions of the Public Resources Code and Regulations, including failures to
3 comply with idle well fee requirements and failure to respond to inquiries and requests by the
4 Supervisor.

5 The Supervisor has determined that an emergency exists, and that emergency remedial
6 work is necessary to prevent damage to life, health, property, and natural resources.

7 Therefore, pursuant to PRC sections 3013, 3106, 3206, 3224, 3226, and 3237, and as set
8 forth below, the Supervisor is ordering Operator to plug and abandon the Wells, to
9 decommission the facilities, and to restore the well sites, consistent with all applicable
10 requirements, including PRC sections 3208, 3228, 3229, and 3230; Regulations sections 1722,
11 1723 through 1723.8, 1724 through 1724.1, 1760, 1775, and 1776; and the conditions included in
12 any permit or approval CalGEM may issue pursuant to PRC section 3229; and until that work is
13 complete, perform remedial work and testing as necessary to prevent damage to life, health,
14 property, and natural resources.

15 **Attachment B**, incorporated herein, contains a list of definitions and authorities that are
16 applicable to this order.

17 **II. Factual and Procedural Summary**

18 On February 27, 2026, CalGEM conducted visual inspections and gas leak detection
19 inspections of the Wells. During the inspection of the well "Highlands-Willow Springs" 4-12,
20 CalGEM identified a leak at the well's inner threaded ball valve and detected a
21 concentration of methane gas at 845,000 parts per million (ppm). Operator's subcontractor
22 indicated to CalGEM that the casing valve, the primary isolation mechanism for the well, is
23 stuck in the open position and unable to isolate casing pressure at the wellhead. Typically, the
24 casing valve would function as the primary isolation mechanism at a wellhead, with the ball
25 valve acting as a secondary isolation mechanism. In this instance, only the ball valve is serving
26 as an isolation mechanism at the well, and the ball valve is leaking. Failure of the ball valve
27 would result in an uncontrolled release of methane gas, further endangering the surrounding
28 residents and property. Operator's subcontractor also reported to CalGEM that the pressure

1 rating on the ball valve is 1,500 pounds per square inch (psi), while in December 2025 the last
2 reading on the wellhead was 2,200 psi, significantly higher than the ball valve is rated to
3 withstand.

4 CalGEM's inspection of the well "Akers" 1-12 identified two leaks, one at the lower
5 master valve of the wellhead at 1,000,000 ppm, and another from the surface casing valve.
6 The detected buildup of pressure in the production casing by surface casing annulus suggests
7 the presence of a hole in the production casing, which endangers the surrounding residents
8 and property.

9 Both of the Wells are located within a Health Protection Zone (HPZ). (PRC, § 3280, subds.
10 (b) & (c).) The well "Highlands-Willow Springs" 4-12 is located within 500 feet of residential
11 housing, and the well "Akers" 1-12 is located within 200 feet of residential housing. Based on
12 the close proximity of the Wells to residential housing, the high concentrations of methane gas
13 being released by the Wells, and the significant safety concern posed by pressures exceeding
14 the valves rating, the Supervisor has determined an emergency exists.

15 **III. Conclusive Evidence of Desertion**

16 Based on CalGEM's records, at all times relevant to this order, Operator was the
17 "operator," as defined in PRC section 3009, of the Wells. At all times relevant to this order, the
18 Wells were idle wells as defined in PRC section 3008, subdivision (d).

19 As the operator of the Wells, following the process for idle well management set forth in
20 PRC section 3206, subdivision (a), Operator submitted an Idle Well Management Plan (**Plan**) in
21 2025 in lieu of paying idle well fees. In accordance with PRC section 3206, subdivision (a)(2)(H),
22 CalGEM conducted an annual review of Operator's Plan and determined that Operator
23 failed to eliminate the required number of idle wells under the Plan. In February 2026, CalGEM
24 notified Operator of its failure to comply with the Plan, the resultant ineligibility of the Plan for
25 use for compliance with PRC section 3206, and invoiced Operator for outstanding annual fees
26 for each of Operator's wells which were idle in 2024 (**Attachment C**, included herein). As of the
27 date of this order, Operator has not paid idle well fees for the Wells which were idle in 2024.
28

1 Operator's failure to pay the required idle well fees for the Wells is conclusive evidence
2 of desertion. (PRC, § 3206, subd. (c).)

3 **IV. Credible Evidence of Desertion**

4 On or about March 5, 2026, CalGEM notified Operator of active methane gas leaks at
5 the Wells (**Attachment D**, included herein). CalGEM instructed Operator to perform immediate
6 maintenance to prevent leakage or corrosion and correction of the violations referenced,
7 and to provide an update within five (5) days of receipt of CalGEM's letter. As of the date of
8 this order, Operator has not performed the required maintenance and corrective work at the
9 Wells and has failed to respond to the Supervisor's inquiry. An operator's failure to respond to
10 inquiries and requests from the Supervisor constitutes credible evidence of desertion of a well.
11 (PRC, § 3237, subd. (a)(2).)

12 Operator's failure to respond to the Supervisor's inquiry or perform the required remedial
13 work at the Wells is credible evidence of desertion. (PRC, § 3237, subd. (a)(2).)

14 **V. Ordered Actions**

15 For the reasons stated herein, CalGEM has determined that the Wells are deserted.
16 Based on information, belief, and a review of the above referenced facts, and in accord with
17 the legal authorities described in this Order, the Supervisor has determined that an emergency
18 exists, and immediate action is necessary to protect life, health, property, and natural
19 resources. Therefore, **IT IS HEREBY ORDERED**, pursuant to PRC sections 3013, 3106, 3222, 3224,
20 and 3226, 3237, and Regulations section 1722.5, among others, that Operator plug and
21 abandon the Wells, decommission the Facilities, and restore the well sites consistent with all
22 applicable requirements of PRC sections 3208, 3224, 3228, 3229, and 3230; Regulations sections
23 1722, 1723 through 1723.8, 1724 through 1724.1, 1760, 1775, and 1776; and the conditions
24 included in any permit CalGEM may issue pursuant to PRC section 3229.

25 **VI. Operator's Appeal Rights**

26 Any party claiming to be an Operator of the Well may appeal this Order by filing a
27 timely written notice of appeal with the Director as described in Article 6 (Appeals and
28 Review) of Division 3 of the PRC, commencing with PRC section 3350. (PRC, §§ 3225, subd. (d);

1 3236.5, subd. (c); 3237, subd. (b).) To file an appeal, a written notice of appeal may be sent
2 via U.S. mail to:

3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Department of Conservation
Director's Office of Appeals
715 P Street, MS 19-06 (Legal Office, Chief Counsel)
Sacramento, California 95814

Or via electronic mail:

OfficeofAppeals@conservation.ca.gov

If a claimed Operator files a timely written notice of appeal, they will be informed of the
appeal hearing date, time, and place. Following the hearing, the claimant will receive a
written decision that affirms, sets aside, or modifies the appealed order. Any costs incurred by
CalGEM under this order (which may include penalties and interest) may constitute a lien
against Operator's real or personal property per PRC section 3423. (PRC, § 3356.)

DATED: 4/6/2026

Doug Ito

Doug Ito
State Oil and Gas Supervisor