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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,**
15 **DECOMMISSION ATTENDANT FACILITIES, AND RESTORE WELL SITES**
16 **NO. 1655**

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19 **Operator: Redbank Oil Co., Operator (R0505)**
20 **Edison Field**
21 **Kern County, Central District**
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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 must pay an annual fee for each idle well pursuant to section 3206 or file an Idle Well Management Plan to eliminate all idle wells in lieu of paying fees. (PRC, § 3206, subd. (a)(1) and (2).) An operator who fails to comply with the Idle Well Management Plan and does not timely appeal the Supervisor's determination of the operator's failure to comply must file the idle well fees for each year that the operator failed to comply with the plan. (PRC, § 3206, subd. (a)(2)(H).)

Relevant to this Order, the Supervisor may determine whether a well or production facility is deserted based upon evidence, including: (1) an operator's failure to pay idle well fees, which is conclusive evidence of desertion (PRC, § 3206 subd. (c)); (2) an operator's failure to comply with Regulations sections 1772 through 1772.4, which is conclusive evidence of desertion (PRC, § 3206.1, subd. (e)); (3) credible evidence including the operational history of the well or production facility, the response or lack of response of the operator to inquiries and requests from the supervisor or district deputy, the extent of compliance of the operator with oil and gas requirements, and other actions (PRC, § 3237, subd. (a)(2)); and (4) an operator's failure to comply with an order of the Supervisor within the time provided by the order or has failed to challenge the order on a timely basis, which creates a rebuttable presumption of desertion (PRC, § 3237, subd. (a)(3)(C).)

Based on CalGEM's records, at all times relevant to this Order, Redbank Oil Co., Operator (**Operator**) is the "operator" (as defined in PRC section 3009) of the wells identified in **Attachment A (the Wells)**, and is responsible (as specified in PRC section 3237, subdivision (c)(1)) for the plugging and abandonment of the Wells, the decommissioning of the

1 production facilities attendant to the Wells (**the Facilities**), and the restoration of the well sites
2 for the Wells.

3 Based upon conclusive evidence of desertion, a rebuttable presumption of desertion,
4 and credible evidence of desertion, described in more detail below, the Supervisor
5 has determined that the Wells and the Facilities are deserted.

6 Under applicable provisions of PRC section 3206, Operator was required to timely pay
7 idle well fees for the Wells which were idle in 2024 and 2025 since Operator failed to comply
8 with the Operator's Idle Well Management Plan. Operator has not paid these fees. This failure
9 to implement the previously approved Idle Well Management Plan and timely pay idle Well
10 fees is conclusive evidence of desertion. In addition, Operator failed to challenge CalGEM's
11 Notice of Cancellation of Idle Well Management Plan issued on February 11, 2026, which
12 creates a rebuttable presumption of desertion. Further, Operator has failed to submit an
13 annual production report required by PRC section 3406, has not operated the Wells and
14 Facilities for several years, and has failed to comply with CalGEM requirements, all of which is
15 credible evidence of desertion.

16 Therefore, pursuant to PRC sections 3106, 3206, 3206.1, 3224, 3226, 3237, and 3406, and
17 as set forth below, the Supervisor is ordering Operator to plug and abandon the Wells, to
18 decommission the Facilities, and to restore the well site for the Wells, consistent with all
19 applicable requirements, including PRC sections 3208, 3228, 3229, and 3230; Regulations
20 sections 1722, 1723 through 1723.8, 1724 through 1724.1, 1760, 1775, and 1776; and the
21 conditions included in any permit/approval CalGEM may issue pursuant to PRC section 3229;
22 and until that work is complete, perform remedial work and testing as necessary to prevent
23 damage to life, health, property, and natural resources.

24 **Attachment B** contains a list of definitions and authorities that are applicable to this
25 Order.

1 **II. Evidence of Desertion**

2 **A. Conclusive Evidence of Desertion**

3 PRC section 3206, subdivision (c), provides that failure to file the required idle well fee
 4 shall be conclusive evidence of desertion of the Wells, permitting the Supervisor to order the
 5 Wells plugged and abandoned pursuant to PRC section 3237.

6 CalGEM designated the Wells as "idle" for the length of time outlined in the below
 7 table. Therefore, at all times relevant to this Order, the Wells were each an "idle well" as
 8 defined in PRC section 3008, subdivision (d).

9 As of May 28, 2026, Operator's Wells below have been idle as follows:

API	Well Designation	Years Idle
0402961425	RNS- Venture 1	15.5
0402962091	Scott- Venture 1	14.33
0402964086	RNS- Venture 2	15.5

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 16 Following the process for idle well management set forth in PRC section 3206,
 17 subdivision (a), Operator submitted an Idle Well Management Plan on April 30, 2025, in lieu of
 18 paying idle well fees. The Idle Well Management Plan required Operator to eliminate one well
 19 on or before December 31, 2025. However, CalGEM staff reviewed the Plan on or about
 20 January 7, 2026, and determined that Operator failed to eliminate any idle wells as required.
 21 Accordingly, CalGEM issued a Notice of Cancellation of Idle Well Management Plan No.
 22 R0505-IWMP-2025, Notice No. 2026-0014, on February 11, 2026 (**Attachment C**, incorporated
 23 herein), to which no timely appeal was received.

24 In accordance with PRC section 3206, subdivision (a)(2)(H), because the Supervisor has
 25 determined that the Operator failed to comply with the Idle Well Management Plan, Operator
 26 is not eligible to use the Plan for purposes of compliance with PRC section 3206. Operator was
 27 instead required to file annual well fees for each of the wells that were idle in 2024 and 2025.
 28 (PRC, § 3206, subd. (a)(2)(H).)

1 As of the date of this Order, Operator has not paid its idle well fees for its Wells nor
2 responded to notices from CalGEM regarding the cancellation of the Idle Well Management
3 Plan, Final Delinquency Notice of 2024 Idle Well Fees, or the 2025 Idle Well Fee Invoice
4 (**Attachment C, Attachment D, and Attachment E**, incorporated herein). Operator's failure to
5 pay the required idle well fees for the Wells is conclusive evidence of desertion. (PRC, § 3206,
6 subd. (c).)

7 **B. Rebuttable Presumption of Desertion**

8 PRC section 3237, subdivision (a)(3)(C), provides that a rebuttable presumption of
9 desertion arises "[i]f an operator has failed to comply with an order of the supervisor within the
10 time provided by the order or has failed to challenge the order on a timely basis."

11 As indicated above, on February 11, 2026, CalGEM issued a cancellation order
12 regarding Operator's Idle Well Management Plan (**Attachment C**), and Operator did not
13 appeal, pursuant to PRC sections 3206, subdivision (a)(2)(H), and 3350. Operator's failure to
14 timely challenge the order creates a rebuttable presumption of desertion.

15 **C. Credible Evidence of Desertion**

16 Pursuant to PRC section 3237, subdivision (a)(2), credible evidence of desertion includes,
17 but is not limited to, the operational history of the well or production facility, the response or
18 lack of response of the operator to inquiries and requests from the supervisor or district deputy,
19 the extent of compliance of the operator with oil and gas requirements, and other actions.
20 Pursuant to PRC section 3406, each operator is required to submit an annual production
21 report, even if the wells are idle.

22 On April 2, 2026, CalGEM sent a Notice of Failure to File Annual Production Volume
23 Report to Operator due to Operator's failure to submit the report due on March 15, 2026
24 (**Attachment F**, incorporated herein). As of the date of this Order, Operator has not responded
25 to this notice nor remediated the violation, which is credible evidence of desertion (PRC, §
26 3237(a)(2)).
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1 In addition, as indicated in the table above, Operator has not produced from the Wells
 2 for several years. Operator also stopped reporting production data for the Wells after 2017, in
 3 violation of PRC section 3227. The most recent production value above zero was reported for
 4 Scott-Venture 1 (API 0402962091) in December 2013, 13 years ago. Further, all but two
 5 components associated with the Facilities have a designated status of Out-of-Service. Lastly,
 6 on or about October 22, 2024, CalGEM staff observed RNS-Venture 1 (API 0402961425) to have
 7 missing bolts on the wellhead in violation of Regulations section 1777, subdivision (a). As of the
 8 date of this Order, Operator has failed to remediate this violation.

9 The operational history of the Wells and Facilities and non-compliance with CalGEM's
 10 requirements is credible evidence of desertion (PRC, § 3237(a)(2)).

11 **III. Operator's Required Actions**

12 For the reasons stated herein, CalGEM has determined that the Wells and Facilities are
 13 deserted. Therefore, pursuant to PRC sections 3106, 3206.1, 3224, 3226, 3237, and 3406, **IT IS**
 14 **HEREBY ORDERED** that Operator plug and abandon the Wells, decommission the Facilities, and
 15 restore the well site for the Wells consistent with all applicable requirements of PRC sections
 16 3208, 3224, 3228, 3229, and 3230; Regulations section 1722, 1723 through 1723.8, 1724 through
 17 1724.1, 1753, 1772, 1773, 1775, 1776, and 1777; and the conditions included in any permit
 18 CalGEM may issue pursuant to PRC section 3229. Until that work is complete, Operator is
 19 ordered to perform remedial work and testing on the Wells as necessary to prevent damage
 20 to life, health, property, and natural resources.

21 **IV. Operator's Appeal Rights**

22 Operator may appeal this Order by filing a timely written notice of appeal with the
 23 Director as described in Article 6 (Appeals and Review) of Division 3 of the PRC, commencing
 24 with PRC section 3350. (PRC, §§ 3225, subd. (d); 3236.5, subd. (c); 3237, subd. (b).) If this Order
 25 is mailed to you, the Director must receive the appeal within fifteen (15) days from the date
 26 the Supervisor mails the Order. To file an appeal, a written notice of appeal may be sent via
 27 U.S. mail to:

1 Department of Conservation
2 Director's Office of Appeals
3 715 P Street, MS 19-06 (Legal Office, Chief Counsel)
4 Sacramento, California 95814

5 Or via electronic mail:

6 OfficeofAppeals@conservation.ca.gov

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

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

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

17 Failure to comply with Section III (Operator's Required Actions) of this Order could
18 subject Operator to further enforcement action. PRC section 3236 makes it a misdemeanor for
19 any person who violates, fails, neglects, or refuses to comply with any of the provisions of the
20 oil and gas conservation laws commencing at PRC section 3000. PRC sections 3236.2 and
21 3236.3 authorizes the Supervisor to refer for civil penalties and injunctive relief for failure to
22 comply with an order or for violation of any provision in Chapter 1 of Division 3 of the PRC or
23 any regulation that implements those statutes. PRC section 3236.5 authorizes the Supervisor to
24 impose a civil penalty on a person who violates any provision in Chapter 1 of Division 3 of the
25 PRC or any regulation that implements those statutes, and the Supervisor may in the future
26 impose further civil penalties based on the facts and omissions underlying this Order. PRC
27 section 3237 authorizes the Supervisor to order the plugging and abandonment of a well or
28 the decommissioning of a production facility if an operator has failed to comply with an order

1 of the Supervisor within the time provided by the order or has failed to challenge the order on
2 a timely basis. PRC section 3359 makes it a misdemeanor to fail or neglect to comply with an
3 order of the Supervisor. Each day's further failure, refusal, or neglect is a separate and distinct
4 offense. (PRC, § 3359.) By issuance of this Order, the Supervisor does not waive the right to take
5 further enforcement actions.

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DATED: 7/1/2026

Doug Ito
Doug Ito
State Oil and Gas Supervisor