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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 PAY A CIVIL PENALTY AND PERFORM REMEDIAL WORK**  
15 **NO. 1661**  
16  
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18 **Operator: West Energy Operating LLC (11109)**  
19 **Field Names: Canfield Ranch and Bellevue**  
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 title 14 of the California Code of Regulations (**Regulations**), may impose a civil penalty on a person who violates any statutory provision of the PRC, or any regulation that implements those statutory provisions. (PRC, § 3236.5.)

Based on CalGEM's records, West Energy Operating, LLC (**Operator**) is the "operator" (as defined in PRC, § 3009) and is responsible for the Wells and associated Production Facilities identified on **Attachment A**, incorporated herein (the "**Wells**" and "**Facilities**"). As described in more detail below, Operator has not maintained compliance with applicable requirements for operation of the Wells and the Facilities. Operator's failure to comply with the Regulations poses a potential threat to life, health, property, and natural resources and constitute violations requiring remedial work and for which the Supervisor has determined imposition of a civil penalty is appropriate. Therefore, pursuant to PRC sections 3013, 3106, 3224, 3225, 3226, 3236.5, and 3270 and Regulations sections 1722, 1773.1, 1773.3, 1773.4, 1773.5, 1775, 1774.1, and 1777, the Supervisor is ordering Operator to (1) perform remedial work to bring the Wells and Facilities into compliance and (2) pay an administrative civil penalty for the violations.

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

## II. Alleged Acts and Omissions

Based on CalGEM's records, at all times relevant to this Order, Operator was the operator, as defined in PRC section 3009, of the Wells and Facilities. On or about May 1, 2025, September 15, 2025, and November 4, 2025, CalGEM conducted inspections of the Wells and Facilities where the violations described below were observed and documented in the Canfield Ranch and Bellevue Fields (**Attachments D, E, and F** incorporated herein).

CalGEM records reflect Operator has not maintained compliance with applicable requirements for operation of the Wells and the Facilities. Operator's lack of adherence to the

Regulations poses a potential threat to life, health, property, and natural resources. The violations at issue are identified below.

**A. Failure to perform pipeline testing. (Regulations § 1774.1, subd. (f).)**

Operators 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 2 years (Regulations, § 1774.1, subd. (f)).

CalGEM has not received the requested pipeline mechanical integrity data (**Attachment C**, incorporated herein), in violation of Regulations section 1774.1, subdivision (f), at the following production facilities:

| Facility Setting ID | Facility Setting Name        | District | Facility (Component) ID | Facility (Component) Name | Facility (Component) Type |
|---------------------|------------------------------|----------|-------------------------|---------------------------|---------------------------|
| 90318241            | Hall-Edgar 73-24 Gas Line    | Central  | 18486                   | Hall-Edgar 73-24          | Pipeline Segment          |
| 90318231            | Gosford 174-23 Gas Line      | Central  | 18475                   | Gosford 174-23            | Pipeline Segment          |
| 90318248            | KCL 2 67X-23 Gas Line        | Central  | 18493                   | KCL 2 67X-23              | Pipeline Segment          |
| 90318243            | KCL 2 47-23 Gas Line         | Central  | 18488                   | KCL 2 47-23               | Pipeline Segment          |
| 90318230            | Gosford 171-23 Gas Line      | Central  | 18474                   | Gosford 171-23            | Pipeline Segment          |
| 90318227            | Edgar 51X-24 Gas Line        | Central  | 18471                   | Edgar 51X-24              | Pipeline Segment          |
| 90318238            | Hall-Edgar 71-24 Gas Line    | Central  | 18482                   | Hall-Edgar 71-24          | Pipeline Segment          |
| 90318229            | Edgar 52-24 Gas Line         | Central  | 18473                   | Edgar 52-24               | Pipeline Segment          |
| 90318250            | KCL Gosford A 17-13 Gas Line | Central  | 18495                   | KCL Gosf A 17-13          | Pipeline Segment          |

|          |                               |         |       |                  |                  |
|----------|-------------------------------|---------|-------|------------------|------------------|
| 90318226 | Edgar 41-24 Gas Line          | Central | 18470 | Edgar 41-24      | Pipeline Segment |
| 90318244 | KCL 2 56-23 Gas Line          | Central | 18489 | KCL 2 56-23      | Pipeline Segment |
| 90318228 | Edgar 41X-24 Gas Line         | Central | 18472 | Edgar 41X-24     | Pipeline Segment |
| 90318239 | Hall-Edgar 72-24 Gas Line     | Central | 18483 | Hall-Edgar 72-24 | Pipeline Segment |
| 90318242 | Hall-Edgar 82-24 Gas Line     | Central | 18487 | Hall-Edgar 82-24 | Pipeline Segment |
| 90318225 | Edgar 44X-24 Gas Line         | Central | 18469 | Edgar 44X-24     | Pipeline Segment |
| 90318260 | KCL Gosford A 48X-13 Gas Line | Central | 18503 | KCL Gos A 48X-13 | Pipeline Segment |

As of the date of this Order, CalGEM does not have any records from Operator demonstrating that the violations were corrected.

**B. Failure to conduct good oilfield practice. (Regulations § 1722, subd. (a).)**

Operators are required 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 and conduct operations in accordance with good oilfield practices. (Regulations, § 1722, subd. (a).)

During the inspection, CalGEM observed weeds within 5-10ft of the wellhead/pumping unit, in violation of Regulations, section 1722, subdivision (a):

| API        | Well Designation |
|------------|------------------|
| 0402942840 | Houghton 46X-35  |

As of the date of this Order, CalGEM does not have any records from Operator demonstrating that the violation has been corrected.

**C. Failure to maintain bull plugs on wellhead. (Regulations, § 1777, subd. (a).)**

The wellhead is the structure and pressure-containing component secured to the surface of a well. Missing bull plugs on the wellhead may lead to leaking around the wellhead

or failure to maintain well pressure. Production facilities include wellheads. (PRC, § 3010; Regulations, § 1760, subd. (r).) Operators are required 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 and conduct operations in accordance with good oilfield practices. (Regulations, §§ 1722, subd. (a); 1777, subd. (a).)

During the inspection, CalGEM observed bull plugs missing from the wellhead at the following well, in violation of Regulations, section 1777, subdivision (a):

| API        | Well Designation     |
|------------|----------------------|
| 0403007350 | Waterbank Fee 36X-14 |

As of the date of this Order, CalGEM does not have any records from Operator demonstrating that the violation has been corrected.

**D. Failure to remove oilfield waste and refuse. (Regulations § 1775, subd. (a).)**

Oilfield waste shall be disposed of in such a manner as not to cause damage to life, health, property, freshwater aquifers or surface waters, or natural resources, or be a menace to public safety. (Regulations, § 1775, subd. (a).)

During the inspection, CalGEM observed oilfield waste comprising soil contaminated with oil due to leaks and overflow from well cellar that had not been properly disposed of, in violation of Regulations section 1775, subdivision (a), at the following well:

| API        | Well Designation |
|------------|------------------|
| 0402942840 | Houghton 46X-35  |

As of the date of this Order, CalGEM does not have any records from Operator demonstrating that the violation has been corrected.

**E. Failure to maintain well sign. (Regulations, § 1722.1.1, subd. (a).)**

Regulations section 1722.1.1, subdivision (a) requires operators to maintain signs identifying wells on the premises from the time the well is drilled until the well is plugged and abandoned.

During the inspection, CalGEM observed the following well to lack a well sign, in violation of Regulations, section 1722.1.1, subd. (a):

| API        | Well Designation     |
|------------|----------------------|
| 0403007350 | Waterbank Fee 36X-14 |

As of the date of this Order, CalGEM does not have any records from Operator demonstrating that the violation was corrected.

**F. Failure to Keep Well Cellar Covered and Drained. (Regulations, § 1777, subd. (c)(3).)**

The well cellar is an excavated area around the wellhead that provides space for equipment at the top of the wellbore. Operators are required to keep well cellars drained. Well cellars are to be covered with grating or flooring and shall be maintained in good condition so as to exclude people and animals. (Regulations, § 1777, subd. (c)(3).)

During the inspection, CalGEM observed fluids in the well cellar and partly uncovered, in violation of Regulations, section 1777, subd. (c)(3), at the following Well:

| API        | Well Designation |
|------------|------------------|
| 0403020995 | Hall-Edgar 82-24 |

As of the date of this Order, CalGEM does not have any records from Operator demonstrating that the violations were corrected.

**III. Civil Penalty/Remedial Work**

**A. Civil Penalty**

Based on the foregoing Alleged Acts and Omissions and pursuant to PRC section 3236.5, by this Order the Supervisor imposes on Operator an administrative civil penalty totaling seven thousand two hundred twenty-five dollars (\$7,225.00) for the 22 violations.

| Violation Description                                                                                                                               | Number of Violations | Associated Civil Penalty per Violation | Civil Penalty Totals |
|-----------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------------------------|----------------------|
| Failure to perform pipeline testing.<br>(Regulations, § 1774.1, subd. (f).)<br>18486<br>18475<br>18493<br>18488<br>18474<br>18471<br>18482<br>18473 | 16                   | \$300                                  | \$4,800              |

|    |                                                                                                                  |   |                             |         |
|----|------------------------------------------------------------------------------------------------------------------|---|-----------------------------|---------|
| 1  | 18495                                                                                                            |   |                             |         |
| 2  | 18470                                                                                                            |   |                             |         |
| 3  | 18489                                                                                                            |   |                             |         |
| 4  | 18472                                                                                                            |   |                             |         |
| 5  | 18483                                                                                                            |   |                             |         |
| 6  | 18487                                                                                                            |   |                             |         |
| 7  | 18469                                                                                                            |   |                             |         |
| 8  | 18503                                                                                                            |   |                             |         |
| 9  | Failure to conduct good oilfield practices<br>(Regulations, § 1722, subd. (a).)<br>0402942840                    | 1 | \$525                       | \$525   |
| 10 | Failure to maintain well sign<br>(Regulations, § 1722.1.1, subd. (a).)<br>0403007350                             | 1 | \$200                       | \$200   |
| 11 | Failure to remove oilfield waste and refuse<br>(Regulations, § 1775, subd. (a).)<br>0402942840                   | 1 | \$750                       | \$750   |
| 12 | Failure to Maintain Bull Plugs on Wellhead<br>(Regulations, § 1777, subd. (a).)<br>0403007350,                   | 1 | \$350                       | \$350   |
| 13 | Failure to Keep Well Cellar <u>Drained</u> and <u>Covered</u> (Regulations, § 1777, subd. (c)(3).)<br>0403020995 | 2 | \$300                       | \$600   |
| 14 |                                                                                                                  |   | <b>Total Civil Penalty:</b> | \$7,225 |

For purposes of this Order, the Supervisor considered relevant circumstances when establishing the amount of the administrative civil penalty, including: characterizing the violations as "minor" (as defined in PRC section 3236.5, subdivision (b)), the eight factors identified in PRC section 3236.5, subdivision (a), and the following: the Wells and pipelines are inside a health protection zone, as defined by Regulations section 1765.1, subdivision (b), a Well and pipelines are environmentally sensitive, as defined by Regulations section 1760, subdivision (f), a Well is critical well, as defined by Regulations section 1720, subdivision (a), and the pipelines are located in an urban area, as defined by Regulations section 1760, subdivision (y).

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**B. Remedial Work**

Pursuant to PRC sections 3224 and 3226, the Supervisor hereby orders Operator to complete remedial work to come into compliance with Regulations sections 1722, 1773.1, 1773.3, 1773.4, 1773.5, 1775, and 1777, as outlined below in Operator's Required Actions.

**IV. Operator's Required Actions**

For the reasons stated herein, pursuant to PRC sections 3013, 3106, 3224, 3225, 3226, and 3236.5, and Regulations sections 1722, 1773.1, 1773.3, 1773.4, 1773.5, 1775, and 1777, **IT IS HEREBY ORDERED** that within 30 days, Operator:

- 1) Pay an administrative civil penalty of seven thousand two hundred twenty-five dollars (\$7,225.00); and

To remit payment of the civil penalty online, please visit <https://www.govone.com/PAYCAL/Home/SelectAgency> and select "California Department of Conservation Geologic Energy Management Division," then follow the instructions on the screen. When filling out the "order number" field, please type the order number followed by the letter "O."

To remit payment of the civil penalty by mail, please send a check payable to "Department of Conservation" to the following address:

Department of Conservation  
CalGEM, Attn: Operational Management Unit  
715 P Street, MS 1803  
Sacramento, California 95814

Please include the Operator name, Order number, and phrase "Oil and Gas Environmental Remediation Account" on the check itself.

- 2) In accordance with PRC section 3224 and Regulations sections 1722, 1773.1, 1773.3, 1773.4, 1773.5, 1775, and 1777 Operator is required to:

a. Perform pipeline testing:

| Facility<br>Setting ID | Facility<br>Setting<br>Name | District | Facility<br>(Component)<br>ID | Facility<br>(Component)<br>Name | Facility<br>(Component)<br>Type |
|------------------------|-----------------------------|----------|-------------------------------|---------------------------------|---------------------------------|
|------------------------|-----------------------------|----------|-------------------------------|---------------------------------|---------------------------------|

|          |                              |         |       |                  |                  |
|----------|------------------------------|---------|-------|------------------|------------------|
| 90318241 | Hall-Edgar 73-24 Gas Line    | Central | 18486 | Hall-Edgar 73-24 | Pipeline Segment |
| 90318231 | Gosford 174-23 Gas Line      | Central | 18475 | Gosford 174-23   | Pipeline Segment |
| 90318248 | KCL 2 67X-23 Gas Line        | Central | 18493 | KCL 2 67X-23     | Pipeline Segment |
| 90318243 | KCL 2 47-23 Gas Line         | Central | 18488 | KCL 2 47-23      | Pipeline Segment |
| 90318230 | Gosford 171-23 Gas Line      | Central | 18474 | Gosford 171-23   | Pipeline Segment |
| 90318227 | Edgar 51X-24 Gas Line        | Central | 18471 | Edgar 51X-24     | Pipeline Segment |
| 90318238 | Hall-Edgar 71-24 Gas Line    | Central | 18482 | Hall-Edgar 71-24 | Pipeline Segment |
| 90318229 | Edgar 52-24 Gas Line         | Central | 18473 | Edgar 52-24      | Pipeline Segment |
| 90318250 | KCL Gosford A 17-13 Gas Line | Central | 18495 | KCL Gosf A 17-13 | Pipeline Segment |
| 90318226 | Edgar 41-24 Gas Line         | Central | 18470 | Edgar 41-24      | Pipeline Segment |
| 90318244 | KCL 2 56-23 Gas Line         | Central | 18489 | KCL 2 56-23      | Pipeline Segment |
| 90318228 | Edgar 41X-24 Gas Line        | Central | 18472 | Edgar 41X-24     | Pipeline Segment |
| 90318239 | Hall-Edgar 72-24             | Central | 18483 | Hall-Edgar 72-24 | Pipeline Segment |

|          |                               |         |       |                  |                  |
|----------|-------------------------------|---------|-------|------------------|------------------|
|          | 24 Gas Line                   |         |       |                  |                  |
| 90318242 | Hall-Edgar 82-24 Gas Line     | Central | 18487 | Hall-Edgar 82-24 | Pipeline Segment |
| 90318225 | Edgar 44X-24 Gas Line         | Central | 18469 | Edgar 44X-24     | Pipeline Segment |
| 90318260 | KCL Gosford A 48X-13 Gas Line | Central | 18503 | KCL Gos A 48X-13 | Pipeline Segment |

b. Dispose oilfield waste and refuse:

| API        | Well Designation |
|------------|------------------|
| 0402942840 | Houghton 46X-35  |

c. Remove weeds from wellhead/pumping unit:

| API       | Well Designation |
|-----------|------------------|
| 402942840 | Houghton 46X-35  |

d. Drain the well cellar and replace missing cellar covering (grating or flooring), at the following Well:

| API       | Well Designation |
|-----------|------------------|
| 403020995 | Hall-Edgar 82-24 |

e. Maintain well sign, at the following Well:

| API       | Well Designation     |
|-----------|----------------------|
| 403007350 | Waterbank Fee 36X-14 |

f. Maintain bull plugs, at the following Well:

| API       | Well Designation     |
|-----------|----------------------|
| 403007350 | Waterbank Fee 36X-14 |

1 Upon performing the required remedial work, please contact CalGEM's Central District  
2 via email at [CalGEMCentralEnvironmental@conservation.ca.gov](mailto:CalGEMCentralEnvironmental@conservation.ca.gov).

3 **V. Operator's Appeal Rights**

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

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

12 Or via electronic mail to:

13 [OfficeofAppeals@conservation.ca.gov](mailto:OfficeofAppeals@conservation.ca.gov)

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

17 If Operator does not file a timely written notice of appeal, or if the Order is affirmed  
18 following an appeal, this Order will become a final order and CalGEM may contract for  
19 performance of the work, pursuant to PRC section 3226, if, within 30 days of this Order,  
20 Operator has not, in good faith, commenced the work ordered. Any costs incurred by  
21 CalGEM to obtain compliance with this Order (which may include penalties and interest) will  
22 constitute a lien against Operator's real or personal property per PRC section 3423. (PRC, §  
23 3356.)

24 **VI. Other Potential Actions to Enforce This Order**

25 Failure to comply with Section IV (Operator's Required Actions) of this Order could  
26 subject Operator to further enforcement action. PRC section 3236 makes it a misdemeanor for  
27 any person who violates, fails, neglects, or refuses to comply with any of the provisions of the  
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oil and gas conservation laws commencing at PRC section 3000. PRC sections 3236.2 and 3236.3 authorize the Supervisor to seek for civil penalties and injunctive relief for failure to comply with an order or for violations of any provision in Chapter 1 of Division 3 of the PRC or any regulation that implements those statutes. PRC section 3236.5 authorizes the Supervisor to impose a civil penalty on a person who violates any provision in Chapter 1 of Division 3 of the PRC or any regulation that implements those statutes, and the Supervisor may in the future impose further civil penalties based on the facts and omissions underlying this order. PRC section 3237 authorizes the Supervisor to order the plugging and abandonment of a well or the decommissioning of a production facility if an operator has failed 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. 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.) By issuance of this Order, the Supervisor does not waive the right to take further enforcement actions.

DATED: 7/23/2026

*Doug Ito*

Doug Ito  
State Oil and Gas Supervisor