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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 **FIRST AMENDED ORDER TO PLUG AND ABANDON WELLS, DECOMMISSION**
15 **ATTENDANT FACILITIES, AND RESTORE WELL SITES**
16 **NO. 1664A**
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18 **Operator: Bridgeland Resources, LLC (11583)**
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This First Amended Order No. 1664A rescinds, supersedes, and replaces Order No. 1664, issued on August 3, 2026.

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 timely pay required annual fees for any idle well is conclusive evidence of desertion. (PRC, § 3206, subds. (a) and (c).) An operator's failure to comply with idle well testing and management requirements for any idle well is conclusive evidence of desertion. (PRC, § 3206.1, subd. (e).)

At all relevant times, Bridgeland Resources, LLC (**Operator**) was the "operator" (as defined in PRC section 3009) of the 69 wells identified on **Attachment A**, incorporated herein (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 production facilities attendant to the Wells (the **Facilities**), and the restoration of the well sites for the Wells. CalGEM records indicate that, under applicable provisions of PRC sections 3206, 3206.1, and 3237, Operator has demonstrated evidence of desertion of the Wells and Facilities in its failure to comply with multiple provisions of the Public Resources Code and Regulations, including failures to comply with idle well fee requirements and failures to comply with idle well testing and maintenance requirements. Based on these ongoing failures to comply with the Public Resources Code and Regulations, the Supervisor has determined that the Wells and the Facilities are deserted.

Therefore, pursuant to PRC sections 3106, 3206, 3206.1, 3224, 3226, and 3237, and as set forth below, the Supervisor is ordering Operator to plug and abandon the Wells, to decommission the Facilities, and to restore the well sites for the Wells, consistent with all

1 applicable requirements, including PRC sections 3208, 3228, 3229, and 3230; Regulations
2 sections 1722, 1723 through 1723.8, 1724 through 1724.1, 1760, 1775, and 1776; and the
3 conditions included in any permit or approval CalGEM may issue pursuant to PRC section
4 3229; and until that work is complete, perform remedial work and testing as necessary to
5 prevent damage to life, health, property, and natural resources.

6 CalGEM issued Order No. 1664 to Operator on August 3, 2026, ordering the plugging
7 and abandonment of the Wells. Order No. 1664 is incorporated herein as **Attachment B**. On
8 August 18, 2026, the Supervisor received an Acknowledgement of Appeal related to Order
9 No. 1664 from the Director's Office of Appeals. The Acknowledgement of Appeal is
10 incorporated herein as **Attachment C**. The Supervisor is now amending Order No. 1664 to:

- 11 1. Add new facts to further support the Supervisor's finding of desertion; and
- 12 2. Clarify violations by well for ease of presentation at hearing.

13 **Attachment D**, incorporated herein, contains a list of definitions and authorities that are
14 applicable to this order.

15 II. 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). The idle start date for each
19 Well is included in the well list in Attachment A.

20 A. Failure to Pay Idle Well Fees (PRC, § 3206, subd. (a))

21 As the operator of the Wells, following the process for idle well management set forth
22 in PRC section 3206, subdivision (a), Operator submitted an Idle Well Management Plan in lieu
23 of paying 2024 idle well fees. However, the Supervisor determined that Operator failed to
24 eliminate the number of long-term idle wells required under the Plan and on February 25, 2025,
25 issued a Notice of Cancellation of the Plan (Notice). This Notice became final on March 12,
26 2025. Operator was thereafter required to pay an idle well fee for each of its wells that
27 were idle in 2024 by May 1, 2025, as provided in the 2025 Idle Well Fee Invoice prepared by
28 CalGEM, and idle in 2025 by May 1, 2026, as provided in the 2026 Idle Well Fee Invoice

prepared by CalGEM. (PRC, § 3206, subds. (a) & (a)(2)(B)(v).) (**Attachments E and F**, incorporated herein.) As of the date of this order, Operator has not paid its idle well fees for the Wells which were idle in 2024 and 2025.

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

B. Failure to Complete Idle Well Testing (Regulations, § 1772.1, subds. (a)(2); (a)(3))

As the operator of the Wells, Operator was required to comply with casing pressure testing requirements for the Wells, as required by Regulations section 1772.1, subdivision (a)(2), and clean out tag requirements for the Wells, as required by Regulations section 1772.1, subdivision (a)(3). Operator failed to comply with casing pressure testing requirements at 56 of the Wells and failed to comply with clean out tag requirements at 60 of the Wells. Most of this testing was required as part of an Idle Well Testing Compliance Work Plan; Operator was required to perform casing pressure testing on 51 of the Wells and a clean out tag on 51 of the Wells in accordance with Regulations section 1772.1.4 and the annual benchmarks outlined in subdivision (b). Between December 2022 and July 2026, CalGEM issued nine Notices of Violation to Operator regarding its outstanding failures to perform casing pressure testing and clean out tags on the Wells, and failures to meet annual benchmarks under a Testing Compliance Work Plan. (**Attachments G, H, I, J, K, L, M, N, and O**, incorporated herein.) To date, Operator has not performed casing pressure testing or clean out tags on any of the Wells due for testing, and remains out of compliance with Regulations sections 1772.1, subdivisions (a)(2) and (a)(3) and section 1772.1.4.

The table below contains a list of the 56 casing pressure tests and 60 clean out tags that Operator failed to perform on the Wells as cited in Attachments G-O, and the date each test was due.

API	Well Designation	Test Type	Test Due Date
0403714447	O'Dea 19	Casing Pressure Test	5/1/2021
0405905369	Hole 52	Casing Pressure Test	5/1/2021
0405905363	Hole 46	Casing Pressure Test	9/1/2021
0403700090	O'Dea 22	Clean out tag	4/1/2022

1	0403700090	O'Dea 22	Casing Pressure Test	4/1/2022
2	0403713647	Trust 5	Clean out tag	4/1/2022
3	0403713647	Trust 5	Casing Pressure Test	4/1/2022
4	0403714452	Rosecrans 2	Clean out tag	4/1/2022
5	0403714452	Rosecrans 2	Casing Pressure Test	4/1/2022
6	0403714669	Rosecrans 19	Clean out tag	4/1/2022
7	0403714669	Rosecrans 19	Casing Pressure Test	4/1/2022
8	0403715509	Wilshire-Peterson 343-P	Clean out tag	4/1/2022
9	0403715509	Wilshire-Peterson 343-P	Casing Pressure Test	4/1/2022
10	0403715725	Santa Fe 513-C	Clean out tag	4/1/2022
11	0403715725	Santa Fe 513-C	Casing Pressure Test	4/1/2022
12	0403715970	Hill-Midway 520-E	Clean out tag	4/1/2022
13	0403715970	Hill-Midway 520-E	Casing Pressure Test	4/1/2022
14	0403716081	S.F.S. 516-P	Clean out tag	4/1/2022
15	0403716081	S.F.S. 516-P	Casing Pressure Test	4/1/2022
16	0405905337	Hole 20	Clean out tag	4/1/2022
17	0405920970	Hole 78	Casing Pressure Test	4/1/2022
18	0403709069	unnamed 414-C	Clean out tag	4/1/2023
19	0403709069	unnamed 414-C	Casing Pressure Test	4/1/2023
20	0403709071	Bell 440-L	Clean out tag	4/1/2023
21	0403709071	Bell 440-L	Casing Pressure Test	4/1/2023
22	0403714768	Bell 459-D	Clean out tag	4/1/2023
23	0403714768	Bell 459-D	Casing Pressure Test	4/1/2023
24	0403714772	Bell 466-C	Clean out tag	4/1/2023
25	0403714772	Bell 466-C	Casing Pressure Test	4/1/2023
26	0403715739	Santa Fe 710-C	Clean out tag	4/1/2023
27	0403715739	Santa Fe 710-C	Casing Pressure Test	4/1/2023
28	0403716229	Off 778-C	Clean out tag	4/1/2023
	0403716229	Off 778-C	Casing Pressure Test	4/1/2023
	0403716270	Santa Fe 731-G	Clean out tag	4/1/2023
	0403716270	Santa Fe 731-G	Casing Pressure Test	4/1/2023
	0403716428	Fulton 4	Clean out tag	4/1/2023
	0403716428	Fulton 4	Casing Pressure Test	4/1/2023
	0403716431	Fulton 1	Clean out tag	4/1/2023
	0403716431	Fulton 1	Casing Pressure Test	4/1/2023
	0403716432	Fulton 2	Clean out tag	4/1/2023
	0403716432	Fulton 2	Casing Pressure Test	4/1/2023
	0405920970	Hole 78	Clean out tag	4/1/2023
	0403716712	unnamed 815-C	Clean out tag	9/18/2023
	0403715016	Rosecrans 37	Clean out tag	9/26/2023
	0403716294	Santa Fe Comm. 536-P	Clean out tag	10/2/2023
	0403713644	Trust 2	Clean out tag	4/1/2024
	0403713644	Trust 2	Casing Pressure Test	4/1/2024

1	0403713649	Trust 7	Clean out tag	4/1/2024
2	0403713649	Trust 7	Casing Pressure Test	4/1/2024
3	0403714556	Crawford 21	Clean out tag	4/1/2024
4	0403714556	Crawford 21	Casing Pressure Test	4/1/2024
5	0403714671	Rosecrans 22	Clean out tag	4/1/2024
6	0403714671	Rosecrans 22	Casing Pressure Test	4/1/2024
7	0403714673	Rosecrans 26	Clean out tag	4/1/2024
8	0403714673	Rosecrans 26	Casing Pressure Test	4/1/2024
9	0403714674	Rosecrans 28	Clean out tag	4/1/2024
10	0403714674	Rosecrans 28	Casing Pressure Test	4/1/2024
11	0403714999	Rosecrans 8	Clean out tag	4/1/2024
12	0403714999	Rosecrans 8	Casing Pressure Test	4/1/2024
13	0403715021	Rosecrans 42	Clean out tag	4/1/2024
14	0403715021	Rosecrans 42	Casing Pressure Test	4/1/2024
15	0403715022	Rosecrans 43	Clean out tag	4/1/2024
16	0403715022	Rosecrans 43	Casing Pressure Test	4/1/2024
17	0403715720	Santa Fe 518G	Clean out tag	4/1/2024
18	0403715720	Santa Fe 518G	Casing Pressure Test	4/1/2024
19	0403715831	Matern 041-B	Clean out tag	4/1/2024
20	0403715831	Matern 041-B	Casing Pressure Test	4/1/2024
21	0403715996	Off 743-N	Clean out tag	4/1/2024
22	0403715996	Off 743-N	Casing Pressure Test	4/1/2024
23	0403715997	Off 762-E	Clean out tag	4/1/2024
24	0403715997	Off 762-E	Casing Pressure Test	4/1/2024
25	0403716034	Santa Fe 729-B	Clean out tag	4/1/2024
26	0403716034	Santa Fe 729-B	Casing Pressure Test	4/1/2024
27	0403716722	unnamed 819-C	Casing Pressure Test	4/1/2024
28	0403716724	unnamed 820-C	Clean out tag	4/1/2024
	0403716724	unnamed 820-C	Casing Pressure Test	4/1/2024
	0403722913	Baker-Humble 2 8R	Clean out tag	4/1/2024
	0403722913	Baker-Humble 2 8R	Casing Pressure Test	4/1/2024
	0403723164	Santa Fe 783-B	Clean out tag	4/1/2024
	0403723164	Santa Fe 783-B	Casing Pressure Test	4/1/2024
	0403726486	unnamed 852-F	Clean out tag	4/1/2024
	0403726486	unnamed 852-F	Casing Pressure Test	4/1/2024
	0405907186	Olinda 17B	Clean out tag	4/1/2024
	0405907186	Olinda 17B	Casing Pressure Test	4/1/2024
	0405907561	Olinda Fee Three 6	Clean out tag	4/1/2024
	0405907561	Olinda Fee Three 6	Casing Pressure Test	4/1/2024
	0405907619	unnamed 99-W	Clean out tag	4/1/2024
	0405907619	unnamed 99-W	Casing Pressure Test	4/1/2024
	0405907620	unnamed 100	Clean out tag	4/1/2024
	0405907620	unnamed 100	Casing Pressure Test	4/1/2024

0405920142	unnamed 110	Clean out tag	4/1/2024
0405920142	unnamed 110	Casing Pressure Test	4/1/2024
0405920935	unnamed 132	Clean out tag	4/1/2024
0405920935	unnamed 132	Casing Pressure Test	4/1/2024
0403716722	unnamed 819-C	Clean out tag	2/22/2025
0403709047	unnamed 208-C	Clean out tag	3/2/2025
0403716225	Off 763-C	Clean out tag	3/5/2025
0403716225	Off 763-C	Clean out tag	3/5/2025
0403715749	Santa Fe 750-E	Clean out tag	3/8/2025
0403727381	Bell 400-06	Clean out tag	3/23/2025
0403709038	unnamed W-411-D	Clean out tag	4/1/2025
0403709038	unnamed W-411-D	Casing Pressure Test	4/1/2025
0403715506	Springs W-274-C	Clean out tag	4/1/2025
0403715506	Springs W-274-C	Casing Pressure Test	4/1/2025
0403716271	Santa Fe 781-S	Clean out tag	4/1/2025
0403716271	Santa Fe 781-S	Casing Pressure Test	4/1/2025
0405905055	Stern Realty 25	Clean out tag	4/1/2025
0405905055	Stern Realty 25	Casing Pressure Test	4/1/2025
0405906697	Olinda 38B	Clean out tag	4/1/2025
0405906697	Olinda 38B	Casing Pressure Test	4/1/2025
0405920312	unnamed 112	Clean out tag	4/1/2025
0405920312	unnamed 112	Casing Pressure Test	4/1/2025
0405921169	unnamed 141	Clean out tag	4/1/2025
0405921169	unnamed 141	Casing Pressure Test	4/1/2025
0403715016	Rosecrans 37	Casing Pressure Test	9/30/2025
0403716294	Santa Fe Comm. 536-P	Casing Pressure Test	10/7/2025

Operator's failure to perform casing pressure testing and clean out tags on the Wells is conclusive evidence of desertion. (PRC, § 3206.1, subd. (e).)

C. Failure to Remediate After Failing to Successfully Complete Idle Well Testing

(Regulations, § 1772.1, subd. (b)).

56 of the Wells are overdue for remediation following Operator's failure to perform successful idle well testing in accordance with Regulations section 1772.1, subdivision (b). Within 12 months of failing to conduct a successful casing pressure test or clean out tag on each well pursuant to Regulations section 1772.1, subdivisions (a)(2) or (a)(3), Operator was required to do one of the following: (1) bring the Wells into compliance with idle well testing requirements, (2) partially plug and abandon the Wells in accordance with Regulations section 1752, (3) plug and abandon the Wells in accordance with PRC section 3208, or (4)

schedule the Wells for plugging and abandonment under an approved Idle Well Management Plan or an approved Testing Waiver Plan (Regulations, § 1772.1, subd. (b)), and Operator failed to do so. Between November 2022 and July 2026, CalGEM issued six Notices of Violation to Operator regarding its outstanding failures to remediate after unsuccessful idle well testing. (**Attachments P, Q, R, S, T, and U**, incorporated herein.) To date, Operator has not remediated any of the 56 Wells, and remains out of compliance with Regulations section 1772.1, subdivision (b).

The table below contains a list of the unsuccessful casing pressure tests and clean out tags that Operator failed to remediate at 56 of the Wells, as cited in Attachments P-U, and the date remediation was due following each unsuccessful test.

API	Well Designation	Test Type	Unsuccessful Test Date	Remediation Due Date
0403714447	O'Dea 19	Casing Pressure Test	5/1/2021	5/1/2022
0405905369	Hole 52	Casing Pressure Test	5/1/2021	5/1/2022
0405905363	Hole 46	Casing Pressure Test	9/1/2021	9/1/2022
0403700090	O'Dea 22	Casing Pressure Test	4/1/2022	4/1/2023
0403700090	O'Dea 22	Clean out tag	4/1/2022	4/1/2023
0403713647	Trust 5	Casing Pressure Test	4/1/2022	4/1/2023
0403713647	Trust 5	Clean out tag	4/1/2022	4/1/2023
0403714452	Rosecrans 2	Casing Pressure Test	4/1/2022	4/1/2023
0403714452	Rosecrans 2	Clean out tag	4/1/2022	4/1/2023
0403714669	Rosecrans 19	Casing Pressure Test	4/1/2022	4/1/2023
0403714669	Rosecrans 19	Clean out tag	4/1/2022	4/1/2023
0403715509	Wilshire-Peterson 343-P	Casing Pressure Test	4/1/2022	4/1/2023
0403715509	Wilshire-Peterson 343-P	Clean out tag	4/1/2022	4/1/2023
0403715725	Santa Fe 513-C	Casing Pressure Test	4/1/2022	4/1/2023
0403715725	Santa Fe 513-C	Clean out tag	4/1/2022	4/1/2023
0403715970	Hill-Midway 520-E	Casing Pressure Test	4/1/2022	4/1/2023
0403715970	Hill-Midway 520-E	Clean out tag	4/1/2022	4/1/2023
0403716081	S.F.S. 516-P	Casing Pressure Test	4/1/2022	4/1/2023
0403716081	S.F.S. 516-P	Clean out tag	4/1/2022	4/1/2023
0405905337	Hole 20	Clean out tag	4/1/2022	4/1/2023
0403709069	unnamed 414-C	Casing Pressure Test	4/1/2023	4/1/2024
0403709069	unnamed 414-C	Clean out tag	4/1/2023	4/1/2024
0403709071	Bell 440-L	Casing Pressure Test	4/1/2023	4/1/2024
0403709071	Bell 440-L	Clean out tag	4/1/2023	4/1/2024
0403714444	O'Dea 16	Casing Pressure Test	4/1/2023	4/1/2024

1	0403714444	O'Dea 16	Clean out tag	4/1/2023	4/1/2024
	0403714768	Bell 459-D	Casing Pressure Test	4/1/2023	4/1/2024
2	0403714768	Bell 459-D	Clean out tag	4/1/2023	4/1/2024
	0403714772	Bell 466-C	Casing Pressure Test	4/1/2023	4/1/2024
3	0403714772	Bell 466-C	Clean out tag	4/1/2023	4/1/2024
	0403715739	Santa Fe 710-C	Casing Pressure Test	4/1/2023	4/1/2024
4	0403715739	Santa Fe 710-C	Clean out tag	4/1/2023	4/1/2024
	0403716229	Off 778-C	Casing Pressure Test	4/1/2023	4/1/2024
5	0403716229	Off 778-C	Clean out tag	4/1/2023	4/1/2024
	0403716270	Santa Fe 731-G	Casing Pressure Test	4/1/2023	4/1/2024
6	0403716270	Santa Fe 731-G	Clean out tag	4/1/2023	4/1/2024
	0403716428	Fulton 4	Casing Pressure Test	4/1/2023	4/1/2024
7	0403716428	Fulton 4	Clean out tag	4/1/2023	4/1/2024
	0403716431	Fulton 1	Casing Pressure Test	4/1/2023	4/1/2024
8	0403716431	Fulton 1	Clean out tag	4/1/2023	4/1/2024
	0403716432	Fulton 2	Casing Pressure Test	4/1/2023	4/1/2024
9	0403716432	Fulton 2	Clean out tag	4/1/2023	4/1/2024
	0405920970	Hole 78	Casing Pressure Test	4/1/2023	4/1/2024
10	0405920970	Hole 78	Clean out tag	4/1/2023	4/1/2024
	0403715016	Rosecrans 37	Clean out tag	9/26/2023	9/26/2024
11	0403716712	unnamed 815-C	Clean out tag	9/26/2023	9/26/2024
	0403716294	Santa Fe Comm. 536-P	Clean out tag	10/2/2023	10/2/2024
12	0403713644	Trust 2	Casing Pressure Test	4/1/2024	4/1/2025
	0403713644	Trust 2	Clean out tag	4/1/2024	4/1/2025
13	0403713649	Trust 7	Clean out tag	4/1/2024	4/1/2025
	0403713649	Trust 7	Casing Pressure Test	4/1/2024	4/1/2025
14	0403714556	Crawford 21	Casing Pressure Test	4/1/2024	4/1/2025
	0403714556	Crawford 21	Clean out tag	4/1/2024	4/1/2025
15	0403714671	Rosecrans 22	Casing Pressure Test	4/1/2024	4/1/2025
	0403714671	Rosecrans 22	Clean out tag	4/1/2024	4/1/2025
16	0403714673	Rosecrans 26	Casing Pressure Test	4/1/2024	4/1/2025
	0403714673	Rosecrans 26	Clean out tag	4/1/2024	4/1/2025
17	0403714674	Rosecrans 28	Casing Pressure Test	4/1/2024	4/1/2025
	0403714674	Rosecrans 28	Clean out tag	4/1/2024	4/1/2025
18	0403714999	Rosecrans 8	Casing Pressure Test	4/1/2024	4/1/2025
	0403714999	Rosecrans 8	Clean out tag	4/1/2024	4/1/2025
19	0403715021	Rosecrans 42	Casing Pressure Test	4/1/2024	4/1/2025
	0403715021	Rosecrans 42	Clean out tag	4/1/2024	4/1/2025
20	0403715022	Rosecrans 43	Casing Pressure Test	4/1/2024	4/1/2025
	0403715022	Rosecrans 43	Clean out tag	4/1/2024	4/1/2025
21	0403715720	Santa Fe 518G	Casing Pressure Test	4/1/2024	4/1/2025
	0403715720	Santa Fe 518G	Clean out tag	4/1/2024	4/1/2025
22	0403715831	Matern 041-B	Casing Pressure Test	4/1/2024	4/1/2025

1	0403715831	Matern 041-B	Clean out tag	4/1/2024	4/1/2025
2	0403715996	Off 743-N	Casing Pressure Test	4/1/2024	4/1/2025
3	0403715996	Off 743-N	Clean out tag	4/1/2024	4/1/2025
4	0403715997	Off 762-E	Casing Pressure Test	4/1/2024	4/1/2025
5	0403715997	Off 762-E	Clean out tag	4/1/2024	4/1/2025
6	0403716034	Santa Fe 729-B	Casing Pressure Test	4/1/2024	4/1/2025
7	0403716034	Santa Fe 729-B	Clean out tag	4/1/2024	4/1/2025
8	0403716722	unnamed 819-C	Casing Pressure Test	4/1/2024	4/1/2025
9	0403716724	unnamed 820-C	Casing Pressure Test	4/1/2024	4/1/2025
10	0403716724	unnamed 820-C	Clean out tag	4/1/2024	4/1/2025
11	0403722913	Baker-Humble 2 8R	Casing Pressure Test	4/1/2024	4/1/2025
12	0403722913	Baker-Humble 2 8R	Clean out tag	4/1/2024	4/1/2025
13	0403723164	Santa Fe 783-B	Casing Pressure Test	4/1/2024	4/1/2025
14	0403723164	Santa Fe 783-B	Clean out tag	4/1/2024	4/1/2025
15	0403726486	unnamed 852-F	Casing Pressure Test	4/1/2024	4/1/2025
16	0403726486	unnamed 852-F	Clean out tag	4/1/2024	4/1/2025
17	0405907186	Olinda 17B	Casing Pressure Test	4/1/2024	4/1/2025
18	0405907186	Olinda 17B	Clean out tag	4/1/2024	4/1/2025
19	0405907561	Olinda Fee Three 6	Casing Pressure Test	4/1/2024	4/1/2025
20	0405907561	Olinda Fee Three 6	Clean out tag	4/1/2024	4/1/2025
21	0405907619	unnamed 99-W	Casing Pressure Test	4/1/2024	4/1/2025
22	0405907619	unnamed 99-W	Clean out tag	4/1/2024	4/1/2025
23	0405907620	unnamed 100	Casing Pressure Test	4/1/2024	4/1/2025
24	0405907620	unnamed 100	Clean out tag	4/1/2024	4/1/2025
25	0405920142	unnamed 110	Casing Pressure Test	4/1/2024	4/1/2025
26	0405920142	unnamed 110	Clean out tag	4/1/2024	4/1/2025
27	0405920935	unnamed 132	Casing Pressure Test	4/1/2024	4/1/2025
28	0405920935	unnamed 132	Clean out tag	4/1/2024	4/1/2025
	0403716722	unnamed 819-C	Clean out tag	2/22/2025	2/22/2026
	0403709047	unnamed 208-C	Casing Pressure Test	3/2/2025	3/2/2026
	0403709047	unnamed 208-C	Clean out tag	3/2/2025	3/2/2026
	0403715749	Santa Fe 750-E	Clean out tag	3/8/2025	3/8/2026
	0403716294	Santa Fe Comm. 536-P	Casing Pressure Test	10/7/2025	10/7/2026
	0403727381	Bell 400-06	Clean out tag	3/23/2025	3/23/2026
	0403716225	Off 763-C	Clean out tag	3/5/2025	3/5/2026

Operator's failure to remediate after unsuccessful idle well testing of the Wells is conclusive evidence of desertion. (PRC, § 3206.1, subd. (e).)

D. Failure to Conduct Fluid Level Testing (Regulations, § 1772.1, subdivision (a)(1))

As the operator of the Wells, Operator was required to comply with fluid level testing requirements for the Wells, as required by Regulations section 1772.1, subdivision (a)(1).

Operator failed to comply with fluid level testing requirements for 58 of the Wells which are due for testing. Between September 2022 and June 2026, CalGEM issued four Notices of Violation to Operator regarding its outstanding failures to perform fluid level testing on the Wells. (**Attachments V, W, X, and Y**, incorporated herein.) To date, CalGEM has not received records of fluid level testing at any of the Wells from Operator.

The table below contains a list of the 58 fluid level tests that Operator failed to perform on the Wells as cited in Attachments V-Y, and the date each test was due.

API	Well Designation	Fluid Level Due Date
0405907186	Olinda 17B	4/1/2021
0405906697	Olinda 38B	4/7/2023
0405920312	unnamed 112	4/7/2023
0405921169	unnamed 141	4/7/2023
0405907619	unnamed 99-W	4/7/2023
0405907620	unnamed 100	4/7/2023
0405920142	unnamed 110	4/7/2023
0405920935	unnamed 132	4/9/2023
0405907561	Olinda Fee Three 6	4/9/2023
0403709069	unnamed 414-C	4/13/2023
0403709071	Bell 440-L	4/13/2023
0403714768	Bell 459-D	4/13/2023
0403714772	Bell 466-C	4/13/2023
0403715831	Matern 041-B	4/13/2023
0403715509	Wilshire-Peterson 343-P	4/14/2023
0403709038	unnamed W-411-D	4/14/2023
0403716428	Fulton 4	4/14/2023
0403716431	Fulton 1	4/14/2023
0403716432	Fulton 2	4/14/2023
0403715720	Santa Fe 518G	4/16/2023
0403715725	Santa Fe 513-C	4/16/2023
0403715970	Hill-Midway 520-E	4/16/2023
0403716034	Santa Fe 729-B	4/16/2023
0403716081	S.F.S. 516-P	4/16/2023
0403715506	Springs W-274-C	4/16/2023
0403723164	Santa Fe 783-B	4/16/2023
0403714452	Rosecrans 2	4/21/2023
0403714671	Rosecrans 22	4/21/2023
0403714673	Rosecrans 26	4/21/2023
0403714674	Rosecrans 28	4/21/2023
0403714999	Rosecrans 8	4/21/2023

0403714556	Crawford 21	4/21/2023
0403715021	Rosecrans 42	4/21/2023
0403700090	O'Dea 22	4/22/2023
0403713647	Trust 5	4/22/2023
0403714669	Rosecrans 19	4/22/2023
0403715022	Rosecrans 43	4/22/2023
0405905337	Hole 20	4/1/2024
0403716712	unnamed 815-C	8/19/2024
0403715735	Santa Fe 720-E	9/19/2024
0403715749	Santa Fe 750-E	9/19/2024
0403716225	Off 763-C	9/19/2024
0403716722	unnamed 819-C	9/19/2024
0403727381	Bell 400-06	9/19/2024
0403709047	unnamed 208-C	9/20/2024
0403716294	Santa Fe Comm. 536-P	9/20/2024
0403715016	Rosecrans 37	9/22/2024
0403715739	Santa Fe 710-C	10/27/2025
0403715997	Off 762-E	10/27/2025
0403716229	Off 778-C	10/27/2025
0403716271	Santa Fe 781-S	10/27/2025
0403716270	Santa Fe 731-G	10/27/2025
0403716724	unnamed 820-C	10/27/2025
0403722913	Baker-Humble 2 8R	10/27/2025
0403715996	Off 743-N	10/27/2025
0403726486	unnamed 852-F	10/27/2025
0403714444	O'Dea 16	11/6/2025
0403714447	O'Dea 19	11/6/2025

Operator's failure to comply with fluid level testing requirements for the Wells is conclusive evidence of desertion. (PRC, § 3206.1, subd. (e).)

E. Failure to Submit Engineering Analysis (Regulations, § 1772.1.2)

As the operator of the Wells, Operator was required to submit an engineering analysis for each of the Wells which has been idle for 15 years, as required by Regulations section 1772.1.2. Operator failed to submit engineering analyses for 40 of the Wells for which analyses are due. Between July 2022 and July 2026, CalGEM issued three Notices of Violation to Operator regarding its outstanding failures to submit engineering analyses for the Wells. (**Attachments Z, AA, and AB**, incorporated herein.) To date, CalGEM has not received an engineering analysis for any of the Wells from Operator.

The table below contains a list of the 40 engineering analyses that Operator failed to submit for the Wells as cited in Attachments Z-AB, and the date each submittal was due.

API	Well Designation	Engineering Analysis Due Date
0403700090	O'Dea 22	5/2/2025
0403709069	unnamed 414-C	5/2/2025
0403709071	Bell 440-L	5/2/2025
0403713644	Trust 2	5/2/2025
0403713647	Trust 5	5/2/2025
0403713649	Trust 7	5/2/2025
0403714444	O'Dea 16	5/2/2025
0403714452	Rosecrans 2	5/2/2025
0403714669	Rosecrans 19	5/2/2025
0403714671	Rosecrans 22	5/2/2025
0403714673	Rosecrans 26	5/2/2025
0403714674	Rosecrans 28	5/2/2025
0403714768	Bell 459-D	5/2/2025
0403714772	Bell 466-C	5/2/2025
0403714999	Rosecrans 8	5/2/2025
0403715022	Rosecrans 43	5/2/2025
0403715509	Wilshire-Peterson 343-P	5/2/2025
0403715720	Santa Fe 518G	5/2/2025
0403715725	Santa Fe 513-C	5/2/2025
0403715831	Matern 041-B	5/2/2025
0403715970	Hill-Midway 520-E	5/2/2025
0403715997	Off 762-E	5/2/2025
0403716034	Santa Fe 729-B	5/2/2025
0403716081	S.F.S. 516-P	5/2/2025
0403716229	Off 778-C	5/2/2025
0403716270	Santa Fe 731-G	5/2/2025
0403716428	Fulton 4	5/2/2025
0403716431	Fulton 1	5/2/2025
0403716432	Fulton 2	5/2/2025
0403716722	unnamed 819-C	5/2/2025
0403716724	unnamed 820-C	5/2/2025
0403722913	Baker-Humble 2 8R	5/2/2025
0403723164	Santa Fe 783-B	5/2/2025
0405907186	Olinda 17B	5/2/2025
0405907619	unnamed 99-W	5/2/2025
0405907620	unnamed 100	5/2/2025
0405920142	unnamed 110	5/2/2025
0405920935	unnamed 132	5/2/2025

0403715739	Santa Fe 710-C	6/1/2026
0405907561	Olinda Fee Three 6	7/1/2026

Operator's failure to comply with 15-year engineering analysis submittal requirements for the Wells is conclusive evidence of desertion. (PRC, § 3206.1, subd. (e).)

III. Operator's Required Actions

For the reasons stated herein, CalGEM has determined that the Wells are deserted. Therefore, pursuant to PRC sections 3106, 3206, 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

Or via electronic mail:

OfficeofAppeals@conservation.ca.gov

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

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

10 **V. Consequences of Noncompliance**

11 Failure to comply with Section III (Operator's Required Actions) of this Order could
12 subject Operator to further enforcement action. PRC section 3236 makes it a misdemeanor for
13 any person who violates, fails, neglects, or refuses to comply with any of the provisions of the
14 oil and gas conservation laws commencing at PRC section 3000. PRC sections 3236.2 and
15 3236.3 authorizes the Supervisor to refer for civil penalties and injunctive relief for failure to
16 comply with an order or for violation of any provision in Chapter 1 of Division 3 of the PRC or
17 any regulation that implements those statutes. PRC section 3236.5 authorizes the Supervisor to
18 impose a civil penalty on a person who violates any provision in Chapter 1 of Division 3 of the
19 PRC or any regulation that implements those statutes, and the Supervisor may in the future
20 impose further civil penalties based on the facts and omissions underlying this Order. PRC
21 section 3237 authorizes the Supervisor to order the plugging and abandonment of a well or
22 the decommissioning of a production facility if an operator has failed to comply with an order
23 of the Supervisor within the time provided by the order or has failed to challenge the order on
24 a timely basis. PRC section 3359 makes it a misdemeanor to fail or neglect to comply with an
25 order of the Supervisor. Each day's further failure, refusal, or neglect is a separate and distinct
26 offense. (PRC, § 3359.) By issuance of this Order, the Supervisor does not waive the right to take
27 further enforcement actions.
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DATED: 9/17/2026

Doug Ito

Doug Ito
State Oil and Gas Supervisor