

Department of Conservation, Geologic Energy Management Division
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STATE OF CALIFORNIA
NATURAL RESOURCES AGENCY
DEPARTMENT OF CONSERVATION
GEOLOGIC ENERGY MANAGEMENT DIVISION

ORDER TO PAY CIVIL PENALTIES AND PERFORM REMEDIAL WORK
NO. 1685

Operator: West Energy Operating LLC (11109)
Field Names: Canfield Ranch and Bellevue
Kern County
Central District

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, 1722.1.1, 1773.4, 1775, 1777, and 1777.3 the Supervisor is ordering Operator to (1) perform remedial work to bring the Wells and Facilities into compliance and (2) pay administrative civil penalties 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. CalGEM records reflect Operator has not maintained compliance with applicable requirements for operation of the Wells and the Facilities. Operators' lack of adherence to the Regulations poses a potential threat to life, health, property, and natural resources.

A. Failure to Perform Tank Testing and to Maintain Records of Tank Testing (Regulations § 1773.4, subd. (a) and 1777.3, subds. (a) and (c).)

Under applicable provisions of Regulations sections 1773.4 and 1777.3, Operator was required to perform tank wall thickness and bottom plate thickness testing on all of the facilities, and to keep records of these tests on file, for provision to CalGEM upon request. As the operator of the Facilities, Operator was required to perform tank wall thickness testing on all of the in-service tanks at least once every five years, as required by Regulations section 1773.4, subdivision (a). According to CalGEM's records, Operator has not submitted any required testing data for the Facilities.

On September 10, 2025, CalGEM issued a written request to Operator for copies of all tank wall and bottom plate thickness testing data for the Facilities. A copy of the request is incorporated herein as **Attachment C**. Regulations section 1777.3, subdivision (a) requires Operators to maintain records of required inspections and tests for five years or for the last two times that the inspection or test has been performed, whichever is longer. Regulations section 1777.3, subdivision (c) provides that this documentation shall be available for review by CalGEM and maintained at the Operator's local office or sent to CalGEM upon request. CalGEM provided Operator with 30 days to submit the documentation, however Operator did not timely submit any testing data by the deadline of October 10, 2025. On March 3, 2026, CalGEM issued a Notice of Violation to Operator for failure to perform required tank testing and submit the requested tank test data by March 17, 2026. (**Attachment D**, incorporated herein.) To date, Operator has not responded to CalGEM's request nor provided copies of the requested testing data.

Operator's failure to timely perform tank wall thickness testing and bottom plate thickness testing on the Facilities and to comply with production facility documentation retention requirements constitute violations of Regulations sections 1773.4 and 1777.3. Therefore, pursuant to PRC sections 3013, 3106, 3224, 3236.5, 3270, and Regulations sections 1773.4 and 1777.3, the Supervisor is ordering Operator to bring the Facilities into compliance with tank testing requirements and to pay a civil penalty for each violation.

On or about September 15, 2025, December 8, 2025, March 3, 2026, March 4, 2026, March 19, 2026, March 24, 2026, April 8, 2026, and April 15, 2026, CalGEM conducted inspections of the Wells and Facilities where the violations described below were observed and documented in the Canfield Ranch and Bellevue Field. (**Attachment E**, incorporated herein.)

B. Failure to affix required well sign (Regulations § 1722.1.1, subd. (a).)

Operators are required to post in "a conspicuous place a clearly visible, legible, permanently affixed sign with the name of the operator, name or number of the lease, and number of the well" on the premises from the time drilling operations cease until the well is plugged and abandoned. (Regulations, § 1722.1.1, subd. (a).)

During the inspection of the Canfield Ranch field, CalGEM observed the well signs with incorrect operator information, or no well sign present, in violation of Regulations, section 1722.1.1, subdivision (a):

API	Well Designation
0403003267	KCL Gosford A 48X-13
0402976549	Tenneco-West Gosford 11X-14
0403048254	Hall-Edgar 73-24

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

C. Failure to conduct operations in accordance with good oilfield practice (Regulations § 1722, subd. (a).)

Operators are required to conduct operations in accordance with good oilfield practice including keeping the well area free of weeds and potential fire hazards. (Regulations § 1722, subd. (a).)

During the inspection, CalGEM observed weeds around the well area which poses a fire hazard, in violation of Regulations, section 1722, subdivision (a).) at the well:

API	Well Designation
0403003525	Statex-KCL 58R-13

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) and (c).)

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).) Unused equipment and scraps attendant to oilfield operations shall be removed from a production or injection operations to prevent damage to life, health, or property, or become a public nuisance or a menace to public safety, and trash and other waste materials attendant to oilfield operations shall be removed and disposed of properly. (Regulations, § 1775, subd. (c).).

During the inspection, CalGEM observed oilfield waste and refuse that had not been properly disposed of, and large quantity of debris present on the lease, in violation of Regulations, sections 1775, subdivision (a) and (c), at the following well and production facility:

API	Well Designation
0402976549	Tenneco-West Gosford 11X-14

Facility Setting ID	Facility Setting Name	District	Facility (Component) ID	Facility (Component) Name	Facility (Component) Type
90317693 (90295159*)	Statex-KCL	Central	25904	Blue Portable Tank	Tank
90317693 (90295159*)	Statex-KCL	Central	25905	Tan Portable Tank	Tank
90317693 (90295159*)	Statex-KCL	Central	5143	Tank 1	Tank

90317693 (90295159*)	Statex-KCL	Central	5144	Tank 2	Tank
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*Setting identification in the lease.

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

E. Failure to maintain bolts on wellhead. (Regulations § 1777, subd. (a).)

The wellhead is equipment secured to the upper part of a well, located above the casing and is held in place by a series of bolts. Damaged or missing bolts on the wellhead may lead to leaking around the wellhead. 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 bolts missing from the wellhead at the following well, in violation of Regulations, section 1777, subdivision (a):

API	Well Designation
0403003525	Statex-KCL 58R-13

As of the date of this Order, CalGEM does not have any records from Operator demonstrating that the violation has been 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 covered and kept drained. Grating or flooring shall be installed and maintained in good condition so as to exclude people and animals. (Regulations, § 1777, subd. (c)(3).)

During the inspections, CalGEM observed fluids in the well cellar, an opening to the grate covering, and the well cellar not properly covered, in violation of Regulations, section 1777, subd. (c)(3), at the following wells:

API	Well Designation
0402976549	Tenneco-West Gosford 11X-14
0403003267	KCL Gosford A 48X-13
0402904499	KCL Gosford A 38-13
0403003525	Statex-KCL 58R-13

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

Civil Penalties/Remedial Work

A. Civil Penalties

Based on the foregoing Alleged Acts and Omissions and pursuant to PRC section 3236.5, by this Order the Supervisor imposes on Operator administrative civil penalties totaling sixteen thousand four hundred fifty dollars (\$16,450.00) for the 38 violations.

Violation Description	Number of Violations	Associated Civil Penalty per Violation	Civil Penalties Totals
Failure to Perform Testing and Submit Test Data Regulations § 1773.4, subd. (a) and 1777.3, subds. (a) and (c). Facility ID 14003 Facility ID 3498 Facility ID 3499 Facility ID 3500 Facility ID 14004 Facility ID 5140 Facility ID 5142 Facility ID 14336 Facility ID 14337 Facility ID 25904 Facility ID 25905 Facility ID 5143 Facility ID 5144 Facility ID 25906 Facility ID 25907 Facility ID 5145 Facility ID 5146 Facility ID 5147 Facility ID 3501	25	\$500.00	\$12,500.00

1	Facility ID 3502			
2	Facility ID 3503			
3	Facility ID 3504			
4	Facility ID 3505			
5	Facility ID 3506			
6	Facility ID 5907			
7				
8	Failure to Affix Well Sign in Health Protection Zone. (Regulations, § 1722.1.1, subd. (a).)	3	\$200.00	\$600.00
9	API 0403003267			
10	API 0402976549			
11	API 0403048254			
12	Failure to Keep Well Free of Weeds in Health Protection Zone. (Regulations, § 1722, subd. (a).)	1	\$400.00	\$400.00
13	API 0403003525			
14	Failure to remove oilfield waste and refuse in Health Protection Zone. (Regulations, § 1775, subd. (a) and (c).)	2	\$400.00	\$800.00
15	API 0402976549			
16	Lease/Setting 90317693 / 90295159			
17	Failure to maintain bolts on wellhead in Health Protection Zone. (Regulations, § 1777, subd. (a).)	1	\$350.00	\$350.00
18	API 0403003525			
19	Failure to Keep Well Cellar Drained in Health Protection Zone. (Regulations, § 1777, subd. (c)(3).)	2	\$300.00	\$600.00
20	API 0402976549			
21	API 0403003525			
22	Failure to Keep Well Cellar Covered in Health Protection Zone. (Regulations, § 1777, subd. (c)(3).)	4	\$300.00	\$1,200.00
23	API 0402976549			
24	API 0403003267			
25	API 0402904499			
26	API 0403003525			
27			Total Civil Penalties:	\$16,450.00

For purposes of this Order, the Supervisor considered relevant circumstances when establishing the amount of the administrative civil penalties, 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 Facilities are inside a health protection zone, as defined by Regulations section 1765.1, subdivision (b).

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, 1722.1, 1773.4, 1775, 1777, and 1777.3 as outlined below in Operator's Required Actions.

III. 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, 1722.1, 1773.4, 1775, 1777, and 1777.3, **IT IS HEREBY ORDERED** that within 30 days, Operator:

- 1) Pay administrative civil penalties of sixteen thousand four hundred fifty dollars (\$16,450.00); and

To remit payment of the civil penalties 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 penalties 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.

1) In accordance with PRC section 3224 and Regulations sections 1722, 1722.1, 1773.4, 1775, 1777, and 1777.3 Operator is required to:

- a. Perform tank wall and bottom plate thickness testing on all of the Facilities listed on Attachment A, in accordance with Regulations section 1773.4.
- b. Submit copies of all tank wall and bottom plate thickness testing performed for all Facilities to CalGEM. Test results may be uploaded to WellSTAR following each test.
- c. Affix correct well signs, per Regulations, section 1722.1.1, subdivision (a):

API	Well Designation
0403003267	KCL Gosford A 48X-13
0402976549	Tenneco-West Gosford 11X-14
0403048254	Hall-Edgar 73-24

- d. Remove weeds from well area:

API	Well Designation
0403003525	Statex-KCL 58R-13

- e. Properly dispose of oilfield waste, refuse, and debris, per Regulations, section 1775, subdivisions (a) and (c), at the following well and production facility:

API	Well Designation
0402976549	Tenneco-West Gosford 11X-14

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Facility Lease/ Setting ID	Facility Setting Name	District	Facility (Component) ID	Facility (Component) Name	Facility (Component) Type
90317693 (90295159*)	Statex-KCL	Central	25904	Blue Portable Tank	Tank
90317693 (90295159*)	Statex-KCL	Central	25905	Tan Portable Tank	Tank
90317693 (90295159*)	Statex-KCL	Central	5143	Tank 1	Tank
90317693 (90295159*)	Statex-KCL	Central	5144	Tank 2	Tank

*Setting identification in the lease.

- f. Replace all missing and/or damaged bolts from the wellhead at the following wells:

API	Well Designation
0403003525	Statex-KCL 58R-13

- g. Drain the well cellar, at the following wells:

API	Well Designation
0402976549	Tenneco-West Gosford 11X-14
0403003267	KCL Gosford A 48X-13
0402904499	KCL Gosford A 38-13
0403003525	Statex-KCL 58R-13

Upon performing the required remedial work, please contact David Cooney-Gam at CalGEM's Central District via email at calgemcentralenvironmental@conservation.ca.gov.

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).) If this Order is mailed to you, the Director must

1 receive the appeal within fifteen (15) days from the date the Supervisor mails the Order. To file
2 an appeal, a written notice of appeal may be sent via U.S. mail to:

3 Department of Conservation
4 Director's Office of Appeals
5 715 P Street, MS 19-06 (Legal Office, Chief Counsel)
6 Sacramento, California 95814

7 Or via electronic mail to:

8 OfficeofAppeals@conservation.ca.gov

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

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

19 **V. Other Potential Actions to Enforce This Order**

20 Failure to comply with Section IV (Operator's Required Actions) of this Order could
21 subject Operator to further enforcement action. PRC section 3236 makes it a misdemeanor for
22 any person who violates, fails, neglects, or refuses to comply with any of the provisions of the
23 oil and gas conservation laws commencing at PRC section 3000. PRC sections 3236.2 and
24 3236.3 authorize the Supervisor to seek for civil penalties and injunctive relief for failure to
25 comply with an order or for violations of any provision in Chapter 1 of Division 3 of the PRC or
26 any regulation that implements those statutes. PRC section 3236.5 authorizes the Supervisor to
27 impose a civil penalty on a person who violates any provision in Chapter 1 of Division 3 of the
28 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: 10/9/2026

Cari Anderson

Cari Anderson
CalGEM Enforcement Chief