## **NOTICE OF VIOLATION**

May 20, 2019

V19-0008

Mr. Nadim Hosn Chevron USA Inc. 9525 Camino Media Bakersfield, CA 93311

FIELD: Cymric; LEASE: SEC. 1 T.30S R.21E DATE OF SURFACE EXPRESSION: 05/10/2019

INSPECTOR: Allan Koch

Reference: Chevron Cymric 1Y Gauge Setting 17 Surface Expression 5-10-2019

Dear Mr. Hosn:

On 05/10/2019, Chevron reported a new high energy surface expression at Cymric 1Y near Gauge Setting 17 to both DOGGR and OES (OES #19-3040). The occurrence of this surface expression is in violation of the California Code of Regulation, Title 14, CCR 1724.11(a) which states "Underground injection projects shall not result in any surface expression".

## The following actions should be performed to address the occurrence of the surface expression:

- Meet with the Division within 30 days of the date of this letter to present a root cause analysis of the surface expression, diagnostic testing performed, and corrective actions taken to prevent future surface expressions.
- Prepare a Surface Expression Monitoring & Prevention Plan for review and approval by the Division by November 20, 2019. The Plan should be an area review that includes the Cymric 1Y continuous Gauge Setting 5 surface expression. At a minimum, per CCR 1724.11(b)(1), the plan shall include the following:
  - (A) A subsurface injection-production mass balancing surveillance system utilizing a continuous tilt meter array or other ground monitoring system approved by the Division; or implementation of a real-time pressure/flow monitoring system that will give adequate warning to prevent surface expressions.
  - (B) A map of the project area with all surface expressions, including cracks, fissures, and sink holes related to underground injection, and containment measures prominently marked. A current map of these features shall be provided to the Division and shall be updated as these features are discovered, installed, or changed.
  - (C) Protocols for restriction of access to areas where there are surface expressions or surface expression containment measures.
  - (D) Training, including safety measures and identification of possible hazards, for field personnel working in areas where there are surface expressions or where surface expressions may occur.

Failure to follow these requirements may result in an additional violation and/or enforcement action, including issuance of a civil penalty or a remedial work order pursuant to PRC Sections 3236.5 or 3224.

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If you have any questions, please call the Associate Oil and Gas Engineer, Allan Koch at (661) 334-3658.

Sincerely,

Cameron D. Campbell

District Deputy, Inland District

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