



## NOTICE OF VIOLATION

October 15, 2019

**NOV: V19-0030 Corrected**  
**WellSTAR Compliance ID: 11183058**

### CERTIFIED MAIL

Mr. Thomas Cruise  
Sentinel Peak Resources California  
1200 Discovery Drive, Suite 100  
Bakersfield, CA 93309

### **VIOLATION: SURFACE EXPRESSION**

**FIELD:** McKittrick; 19Z (Richfield) Lease; SEC. 19 T.30S R.22E MD

**DATE OF SURFACE EXPRESSION:** MAY 28, 2019

**INSPECTOR:** Victor Medrano / Mario Ortiz

**Reference:** Public Resources Code (PRC) section 3106, subdivision (a);  
California Code of Regulations, title 14, (CCR) sections 1724.11, 1724.6, 1724.7, and  
1724.10

Dear Mr. Cruise:

On May 28, 2019, Sentinel Peak Resources California (SPR) reported a surface expression that occurred on the Chevron "Richfield" lease at 35.309236, -119.651933 within Section 19 T30S/R22E in the McKittrick Oilfield to the Division of Oil, Gas, and Geothermal Resources (DOGGR). During a technical presentation by Chevron, data shown indicates that no Underground Injection – Steam operations were being conducted by Chevron within 1,500 feet. Data further suggests that operations conducted by SPR on the 19Z lease, roughly 300 feet away, is likely the source. As result, DOGGR is correcting the original Notice of Violation (NOV) sent to Chevron, and thus re-issuing the NOV to SPR, for the expression within Chevron's property on May 28, 2019. **This surface expression is a violation of, at least, CCR section 1724.11, subdivision (a).**

On May 29, 2019, DOGGR staff visited the site (Exhibit A). In addition, DOGGR staff visited the site post-cleanup on August 5, 2019, which showed signs of oil still migrating

to surface post-cleanup (Exhibit B). **The surface expression at 35.309236, -119.651933 within Section 19 T30S/R22E in the McKittrick Oilfield is a violation and needs to be stopped.**

**All surface expressions are violations and SPR must stop the continued flow of all expressions and work to ensure the absence of reoccurrences. As such, the Acting State Oil and Gas Supervisor requires SPR to perform the following required actions to begin to address the occurrence of the surface expressions at the "Richfield" lease at 35.309236, -119.651933 within Section 19 T30S/R22E in the McKittrick Oilfield:**

1. Meet with DOGGR within 10 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.
2. Per CCR section 1724.11 subdivision (d), immediately implement a minimum 150 feet steam restriction radius around the May 28, 2019 surface expression. If the surface expression continues to flow for more than five days, then the operator shall immediately implement a minimum 600 feet steam restriction radius around the surface expression.

Furthermore, per CCR section 1724.11 subdivision (d), if the surface expression(s) continue to flow for more than 10 days, then DOGGR has the authority to expand the radius around the surface expression within which injection shall cease. DOGGR will determine the expanded radius based on consideration of the flow rate of the surface expression, geologic factors, and operational parameters.

3. Place prominent "Danger" or "Warnings" near (as safety dictates) the surface expression and restrict access to the area until the surface expression has stopped flowing and the area deemed safe for reentry by a professional engineer licensed under Chapter 7 of Division 3 of the California Business and Professions Code, as per CCR section 1724.11 subdivision (i).
4. Incorporate the "Richfield" lease (35.309236, -119.651933) event within a Surface Expression Monitoring & Prevention Plan, for review and approval by DOGGR by December 23, 2019. At a minimum, per CCR section 1724.11 subdivision (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 DOGGR; 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 DOGGR 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.

**As indicated above, the occurrence of a surface expression is a violation of CCR section 1724.11, subdivision (a). In addition to any civil penalties that may issue for the occurrences of surface expressions since this prohibition went into effect on April 1, 2019, failure to follow the above requirements, and remedy the current ongoing violations, may result in an additional Notice of Violation and/or enforcement actions. Such enforcement actions could include the issuance of a civil penalty and/or a remedial work order pursuant to PRC sections 3236.5 and/or 3224, respectively.**

If you have any questions, please call the District Deputy, Cameron Campbell at (661) 322-4031.

Sincerely,



Cameron D. Campbell  
District Deputy, Inland District

Enclosure(s):

cc: Jason Marshall  
Nikki Joslin

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Exhibit A

Location of the Surface Expression



Exhibit B

Follow-up Site Visit (Oil still migrating post-cleanup)

