

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 PERFORM REMEDIAL WORK AND PAY CIVIL PENALTIES**  
**NO. 1517**

**Operator: Sentinel Peak Resources California LLC (\$2641)**

## 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, section 3236.5.)

Based on CalGEM's records, Sentinel Peak Resources California LLC (**Operator**) is the "operator" (as defined in PRC section 3009) of the waterflood projects identified on **Attachment A**, including Underground Injection Control (UIC) Project No. 324-00-015 of the Inglewood field, the East Unit pool, which includes projects C63, ST2, ST6 and ST7, collectively converted to PX3 and is located East of the Newport-Inglewood fault associated with Underground Injection Control (UIC) Project No. 324-00-015, and the West Unit pool which includes projects C60, C61, C62, T71, and T72, collectively converted to PX2 and is located West of the Newport-Inglewood fault associated with UIC Project No. 324-00-016, incorporated herein (**the Projects**). Under applicable provisions of Regulations section 1724.7, Operator was required to support the Projects by ensuring that submitted UIC project data are current and accurately reflect the project setting, specifically the wellbore casing diagrams (in accordance with Regulations section 1724.7.1), and that the Projects are not causing damage to life, health, property, or natural resources, and Operator failed to do so. Operator's failure to submit the required UIC project data constitutes violations of Regulations section 1724.7.

Therefore, pursuant to PRC sections 3013, 3106, 3224, and 3236.5, and Regulations section 1724.7, the Supervisor is ordering Operator to within thirty (30) days of this Order: (1) pay civil penalties, totaling one thousand five hundred dollars (\$1,500.00), imposed for violations of Regulations section 1724.7; and (2) submit the required UIC project data for the Projects as described in Section III of this Order and **Attachments C-F**, incorporated herein.

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

## **Failure to Provide Required Data for UIC Projects 324-000-15 and 324-000-16**

### **(Regulations § 1724.7)**

Regulations section 1724.7 describes the data that must be provided, and updated for accuracy and completeness, as necessary, for each UIC project. These data are essential for CalGEM's ongoing evaluation of an existing project's continued safe operation in compliance with current standard requirements and any pertinent project-specific conditions. The data provided must be current and accurate along with providing a detailed list of requirements for wellbore diagrams to comply with. As described in more detail below, CalGEM's records indicate that Operator has not submitted sufficient required UIC project data for the Projects in violation of Regulations section 1724.7. Failure to provide the required UIC project data impedes CalGEM's ability to ensure injected fluid is being confined to the approved injection zone and to prevent damage to life, health, property, and natural resources.

### **A. Failure to Provide Accurate or Ample Wellbore Diagrams for UIC Projects 324-000-15 and 324-000-16**

CalGEM has determined that the wellbore diagrams submitted for UIC Projects 324-000-15 and 324-000-16 do not comply with the requirements set forth in Regulations sections 1724.7, subdivision (a), and 1724.7.1. The deficiencies include failure to provide accurate true vertical depths at all depths (CCR section 1724.7.1, subdivision (d)), formation locations (CCR section 1724.7, subdivision (a)(15)), and the spud date of the wellbore (CCR section 1724.7.1, subdivision (a)(2)). The most commonly observed inaccuracies or missing information include the following:

1. **Inaccurate Wellbore Data:** Failure to provide accurate wellbore information constitutes a violation of Regulations section 1724.7, subdivision (a), which states, in part, that the "operator is responsible for ensuring that the data are current and accurate . . ."
2. **Improper Kickoff Point Documentation:** The kickoff points, which represent casing cuts or modifications, were not properly documented. These data are required under Regulations section 1724.7.1, subdivision (a)(9).
3. **Data Inconsistencies:** The graphical wellbore diagrams do not align with the flat file

data sets, in violation of Regulations section 1724.7.1, subdivision (e).

**B. CalGEM's Request for Project Data and Communication with Operator**

On October 1, 2024, CalGEM sent an email outlining the deficient and/or incorrect data as it relates to the wellbore casing diagrams and requested Operator to submit this information by October 18, 2024. (**Attachment C**, incorporated herein.) On October 21, 2024, CalGEM granted Operator's request for an extension to submit project data to December 20, 2024. (**Attachment D**, incorporated herein.) On December 18, 2024, Operator requested an additional twelve-week extension. (**Attachment E**, incorporated herein.) On December 24, 2024, CalGEM issued a Notice of Violation (NOV) for failure to submit requested updated wellbore diagrams for UIC Project Numbers 324-00-015 and 324-00-016. (**Attachment F**, incorporated herein.) As of the date of this Order, Operator has not provided all of the required accurate wellbore diagrams for UIC Project Numbers 324-00-015 and 324-00-016.

In summary, the Operator has not provided UIC project data that:

- (a) complies with the requirements of Regulations sections 1724.7 and 1724.7.1;
- (b) is current, complete, and accurately demonstrates that the injected fluid is confined to the approved injection zone; or
- (c) demonstrates that the underground injection project does not pose a risk to life, health, property, or natural resources.

**II. Civil Penalties**

Based on information, belief, and a review of CalGEM's records, Operator is the current operator of the Wells. Based on the foregoing and pursuant to PRC section 3236.5, by this Order the Supervisor imposes on Operator administrative civil penalties totaling one thousand five hundred dollars (\$1,500.00) for two (2) violations of Regulations section 1724.7.

Type of Violation	Number of Violations	Total Civil Penalty per Violation
Failure to submit required UIC project data (Regulations § 1724.7)	2	\$750.00
	<b>Total Civil Penalty:</b>	<b>\$1,500.00</b>

For purposes of this Order, the Supervisor considered relevant circumstances, 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 ongoing period of non-compliance. Because of these violations and based on consideration of relevant circumstances consistent with PRC section 3236.5, subdivision (a), by this Order the Supervisor is imposing on Operator civil penalties totaling one thousand five hundred dollars (\$1,500.00).

### III. Operator's Required Actions

For the reasons stated herein, pursuant to the PRC sections 3013, 3106, 3224, 3236.5, 3270, and Regulations section 1724.7, **IT IS HEREBY ORDERED** that Operator:

1) Pay civil penalties in the amount of one thousand five hundred dollars (\$1,500.00); and

a. Submit the required UIC project data for the Projects as described in Section II of this Order and Attachments C-F.

2) The work plan shall be submitted electronically to:

Name: Chris Phillips

Email: [Chris.Phillips@conservation.ca.gov](mailto:Chris.Phillips@conservation.ca.gov)

Any questions concerning CalGEM's expectations for the work plan can be directed to Chris Phillips at [Chris.Phillips@conservation.ca.gov](mailto:Chris.Phillips@conservation.ca.gov).

Operator is required to pay the civil penalties amount and submit the required detailed work plan for CalGEM's review and approval for the Projects within **thirty (30) days** from the date this Order is issued. Daily violations and penalties will continue to accrue if these requirements are not addressed to CalGEM's satisfaction within thirty (30) days of this Order.

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.

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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 18-03  
Sacramento, California 95814

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

Please contact Chris Phillips via electronic mail at [Chris.Phillips@conservation.ca.gov](mailto:Chris.Phillips@conservation.ca.gov) with any questions concerning the violations or the data required to be submitted.

#### **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 the PRC section 3350. (PRC, § 3225, subd. (d).) If this Order is mailed to you, the Director must receive the appeal within fifteen (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](mailto:OfficeofAppeals@conservation.ca.gov)

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

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

Failure to comply with Section IV (Operator's Required Actions) of this Order could subject Operator to further enforcement action. PRC section 3236 makes it a misdemeanor for

any person who violates, fails, neglects, or refuses to comply with any of the provisions of the oil and gas conservation laws commencing at PRC section 3000. 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.)

*Elizabeth Yura*

DATED: 4/24/2025

Elizabeth Yura on behalf of  
Doug Ito  
State Oil and Gas Supervisor