

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 PLUG AND ABANDON WELLS, DECOMMISSION ATTENDANT FACILITIES,
AND RESTORE WELL SITES
NO. 1566

Operator: Paul M. Woodward (W3600)

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. (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).)

Based on CalGEM's records, Paul M. Woodward (**Operator**) is the "operator" (as defined in PRC section 3009) of the six 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 and the three facilities identified on Attachment A (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 numerous failures to comply with idle well fee and idle well testing requirements, failure to comply with an order of the Supervisor, and failure to respond to Supervisor inquiries and requests. 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 applicable requirements, including PRC sections 3208, 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/approval CalGEM may issue pursuant to PRC section 3229; and until that work is complete, perform remedial work and testing as necessary to prevent damage to life, health, property, and natural resources.

Attachment B, incorporated herein, contains a list of definitions and authorities that are applicable to this order.

II. Conclusive Evidence of Desertion

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. At all times relevant to this order, the Wells were idle wells as defined in PRC section 3008, subdivision (d).

As the operator of the Wells, following the process for idle well management set forth in PRC section 3206, subdivision (a), Operator did not submit an Idle Well Management Plan in lieu of paying idle well fees. Operator was therefore required to pay an idle well fee for each of its idle wells that were idle in 2024 by May 1, 2025, as provided in the 2025 Idle Well Fee Invoice prepared by CalGEM. (PRC, § 3206, subds. (a) & (a)(2)(B)(v).) (**Attachment C** 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.

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

As the operator of the Wells, Operator was required to submit an Idle Well Testing Compliance Work Plan for the Wells by June 1, 2019, as required by Regulations section 1772.1.4, subdivision (a), and Operator failed to do so. As the operator of the Wells, Operator was required to comply with annual testing benchmarks of the Wells under an Idle Well Testing Compliance Work Plan, as required by Regulations section 1772.1.4, subdivision (b), and operator failed to do so. CalGEM issued Notices of Violation to Operator regarding the outstanding Plan and the failure to meet testing benchmarks, and when the violations were not remediated, CalGEM issued Order No. 1354 to Pay a Civil Penalty to Operator on December 21, 2023. (**Attachment D**, incorporated herein.) Operator did not submit a Testing

Compliance Work Plan and did not perform any idle well testing under the plan. Operator was required to complete testing on all the Wells covered by the Testing Compliance Work Plan by April 1, 2025, in accordance with Regulations section 1772.1.4, subdivision (b). As of the date of this order, Operator has not remediated the outstanding violations for the Wells which are overdue for testing.

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

III. Rebuttable Presumption of Desertion

As the operator of the Wells, Operator was required to comply with orders issued by the Supervisor. In 2023, the Supervisor issued a civil penalty order to Operator for its failure to comply with the Public Resources Code and Regulations. The Supervisor issued Order No. 1354 to Pay a Civil Penalty on December 21, 2023. (Attachment D, incorporated herein.) To date, Operator has not complied with this order; Operator has not paid the outstanding civil penalties nor remediated the outstanding violations for the Wells and Facilities.

Operator's failure to comply with an order of the Supervisor within the time provided in the order and failure to challenge the order on a timely basis create a rebuttable presumption of desertion. (PRC, § 3237, subd. (a)(3)(C).)

IV. Credible Evidence of Desertion

In addition to issuing a civil penalty order, CalGEM has issued multiple Notices of Violation to Operator since 2023 and attempted to contact Operator regarding its many violations and idle wells. To date, Operator has failed to respond to CalGEM's notices and outreach regarding the Wells and Facilities. The lack of response by Operator to inquiries and requests from CalGEM constitutes credible evidence of desertion. (PRC, § 3237, subd. (a)(2).)

As the Operator of the Wells, Operator is required to maintain the Wells and Facilities in accordance with the requirements of the Public Resources Code, and Operator has failed to do so. Operator's widespread noncompliance and multitude of violations at the Wells and Facilities constitutes credible evidence of desertion. (PRC, § 3237, subd. (a)(2).)

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1 **V. Operator's Required Actions**

2 For the reasons stated herein, CalGEM has determined that the Wells and the Facilities
3 are deserted. Therefore, pursuant to PRC sections 3106, 3206, 3206.1, 3224, 3226, and 3237, **IT IS**
4 **HEREBY ORDERED** that Operator plug and abandon the Wells, decommission the Facilities, and
5 restore the well sites) for the Wells consistent with all applicable requirements of PRC sections
6 3208, 3224, 3228, 3229, and 3230; Regulations sections 1722, 1723 through 1723.8, 1724 through
7 1724.1, 1760, 1775, and 1776; and the conditions included in any permit CalGEM may issue
8 pursuant to PRC section 3229. Until that work is complete, Operator is ordered to perform
9 remedial work and testing on the Wells and the Facilities as necessary to prevent damage to
10 life, health, property, and natural resources.

11 **VI. Operator's Appeal Rights**

12 Operator may appeal this Order by filing a timely written notice of appeal with the
13 Director as described in Article 6 (Appeals and Review) of Division 3 of the PRC, commencing
14 with PRC section 3350. (PRC, §§ 3225, subd. (d); 3236.5, subd. (c); 3237, subd. (b).) If this Order
15 is mailed to you, the Director must receive the appeal within (15) days from the date the
16 Supervisor mails the Order. To file an appeal, a written notice of appeal may be sent via U.S.
17 mail to:

18 Department of Conservation
19 Director's Office of Appeals
20 715 P Street, MS 19-06 (Legal Office, Chief Counsel)
21 Sacramento, California 95814

22 Or via electronic mail:

23 OfficeofAppeals@conservation.ca.gov

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

27 If Operator does not file a timely written notice of appeal, or if the order is affirmed
28 following an appeal, this order will become a final order and CalGEM may contract for

1 performance of the work, pursuant to PRC section 3226, if, within 30 days of this order,
2 Operator has not, in good faith, commenced the work ordered. Any costs incurred by
3 CalGEM to obtain compliance with this order (which may include penalties and interest) will
4 constitute a lien against Operator's real or personal property per PRC section 3423. (PRC, §
5 3356.)

6 **VII. Consequences of Non-Compliance**

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

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3 DATED: 10/9/2025

DocuSigned by:
Lindsey Miller
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4 Lindsey Miller
5 CalGEM Enforcement Chief, on
6 behalf of the State Oil and Gas
7 Supervisor
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