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Geologic Energy Management Division  
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8 **STATE OF CALIFORNIA**  
9 **NATURAL RESOURCES AGENCY**  
10 **DEPARTMENT OF CONSERVATION**  
11 **GEOLOGIC ENERGY MANAGEMENT DIVISION**  
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14 **ORDER TO PAY CIVIL PENALTIES AND PERFORM REMEDIAL WORK**  
15 **NO. 1650**  
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18 **Operator: Longbow, LLC (L2505)**  
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1 **I. Introduction**

2 The State Oil and Gas Supervisor (**Supervisor**), acting through the Geologic Energy  
3 Management Division (**CalGEM**), and under the authority of Division 3 of the Public Resources  
4 Code (**PRC**) (commencing with PRC section 3000) and title 14 of the California Code of  
5 Regulations (**Regulations**), may order tests and remedial work which, in the Supervisor's  
6 judgment, are necessary to prevent damage to life, health, property, and natural resources,  
7 and may impose a civil penalty on a person who violates any statutory provision of the PRC,  
8 or any regulation that implements those statutory provisions. (PRC, §§ 3224, 3236.5.)

9 Based on CalGEM's records, Longbow, LLC (**Operator**) is the "operator" (as defined in  
10 PRC section 3009) of the "injection wells" (as defined in Regulations section 1720.1, subdivision  
11 (f)) identified on **Attachment A**, incorporated herein (**the Wells**). As described in more detail  
12 below, under applicable provisions of Regulations sections 1724.10, 1724.10.1, and 1724.10.2,  
13 to maintain uninterrupted approval for injection activity, Operator was required to complete  
14 Mechanical Integrity Testing (MIT) Part One and Part Two on the Wells by specified dates and  
15 failed to timely perform one or both of the tests on each of the Wells and also failed to submit  
16 required test results. As a result, Operator automatically lost approval to continue injection  
17 operations following the respective testing due date(s). (Regulations, § 1724.10, subd. (i)(4).)  
18 Operator was therefore required to cease injection into the Wells, immediately notify CalGEM  
19 that it had not performed MIT Part One or Part Two on the Wells, as applicable, and  
20 disconnect the injection lines from the Wells, and failed to do so in violation of Regulations  
21 sections 1724.10, 1724.10.1, 1724.10.2, 1724.13, and 1777.

22 Therefore, pursuant to PRC sections 3013, 3106, 3224, and 3236.5, and Regulations  
23 sections 1724.6, 1724.10, 1724.10.1, 1724.10.2, 1724.13, and 1777, the Supervisor is ordering  
24 Operator to (1) as soon as it safe to do so, cease injection into and disconnect the injection  
25 lines from all wells without current injection approval, (2) submit MIT Part Two test results for well  
26 Tejon Ranch 24, and (3) within thirty (30) days of this Order pay civil penalties totaling seventy-  
27 nine thousand dollars (\$79,000.00), imposed for violations of Regulations sections 1724.10,  
28 1724.10.1, 1724.10.2, 1724.13, and 1777.



1724.10.2, including an explanation that MIT Part One and Part Two must be completed for subject wells by April 1, 2024, or other date per the testing frequency stated in the applicable PAL, to maintain uninterrupted approval for injection activity. (**Attachment C**, incorporated herein.)

During all times relevant to this Order, CalGEM's records indicate that the Wells were each a "disposal injection well" (as defined in Regulations section 1720.1, subdivision (c).) As indicated in Operator's PAL, as of April 1, 2019, the Wells were previously subject to periodic casing pressure testing and annual fluid migration testing requirements.

Based on CalGEM's records, Operator last successfully performed mechanical integrity tests on the Wells as described in the table below.

API	Well Designation	Date of Previous MIT Part One	Date of Most Recent MIT Part One	Date of Previous MIT Part Two	Date of Most Recent MIT Part Two
0403046608	Tejon Ranch 24	1/24/2018	5/1/2024	12/19/2018 1/2/2020; 1/2/2021; 1/19/2023; 2/21/2024	2/6/2026 (missing test results)
0402966044	Tejon Ranch 12	12/6/2017	5/1/2024	12/19/2018; 1/2/2020; 1/2/2021; 1/19/2023	2/21/2024
0402966045	Tejon Ranch 13	--	5/9/2014	12/19/2018 1/2/2020	2/6/2026

As indicated, Operator failed to perform MIT Part One on the Wells within five years from previously successful tests. In addition, on multiple instances, Operator failed to perform MIT Part Two on the Wells within one year from previously successful tests and has not submitted the test results for the most recent MIT Part Two performed on the Tejon Ranch 24 well.

1 After the first instance of missing a testing due date, Operator automatically lost  
 2 approval for injection into each respective well, and Operator would have continued to lack  
 3 injection approval unless subsequent written approval from CalGEM was provided.  
 4 (Regulations, §§ 1724.6, subd. (e), 1724.10, subd. (i)(4), 1724.10.1, subd. (a) & (e), 1724.10.2,  
 5 1724.13, subd. (b).) Following this automatic loss of injection approval, Operator was required  
 6 to cease injection into the Wells, immediately notify CalGEM of its failure to timely perform the  
 7 testing, and disconnect the Wells from any injection lines, and Operator failed to do so in  
 8 violation of Regulations sections 1724.10, 1724.10.1, 1724.10.2, 1724.13, and 1777.

9 On April 5, 2024, CalGEM staff sent a courtesy notice, via email, alerting Operator that it  
 10 had been identified as (1) having one or more injection wells with an active status and (2)  
 11 having failed to notify CalGEM of ceasing injection operations or a record of passing the  
 12 required testing for its injection wells. (**Attachment D**, incorporated herein.).

13 Based on Operator's self-reported injection activity, Operator continued injection into  
 14 the Wells without approval as described in the below table, combining into a total of 392 days  
 15 of unauthorized injection. The date ranges only include days of unauthorized injection once,  
 16 on a per well basis.

API	Well Designation	Date Ranges for Civil Penalties	# Days of Unauthorized Injection for Civil Penalties	
0403046608	Tejon Ranch 24	Due to MIT Part One Non-Compliance: April 2024	29	300
		Due to MIT Part Two Non-Compliance: February 2024, February 2025 – June 2025, September 2025 – December 2025	271	

1	0402966044	Tejon Ranch 12	Due to MIT Part One Non-Compliance: April 2024	29	61
2			Due to MIT Part Two Non-Compliance: January 2024 – February 2024	32	
3	0402966045	Tejon Ranch 13	Due to MIT Part One Non-Compliance: December 2025	31	31
4			Due to MIT Part Two Non-Compliance: December 2025	31	
5				<b>Total Days:</b>	392

13 In addition, on or about April 4, 2025, CalGEM staff conducted inspections of the Wells  
14 and observed the injection line(s) to be connected.

15 As of the date of this Order, based on CalGEM's records, no written approval to  
16 reinstate injection operations has been provided for any of the Wells, and Operator has not  
17 notified CalGEM of ceasing injection operations, a well status change, nor demonstrated that  
18 injection lines are disconnected from the Wells.

19 **III. Civil Penalties**

20 Based on the foregoing Alleged Acts and Omissions and pursuant to PRC section  
21 3236.5, by this Order the Supervisor imposes on Operator administrative civil penalties totaling  
22 seventy-nine thousand dollars (\$79,000.00) as follows:

23 <b>Violation Description</b>	<b>Number of Violations</b>	<b>Civil Penalty Amount Per Violation</b>	<b>Total Civil Penalties Amount</b>
24 Injection into a well without injection approval (collectively, Regulations, §§ 1724.10, subd. (i)(4), 1724.10.1, subd. (e), 1724.10.2, subd. (b)(6), 1724.13, subd. (a)(1) & (3))	25 392	26 \$200.00	27 \$78,400.00

Failure to disconnect injection lines from a well without injection approval (Regulations, § 1777, subd. (c)(4))	3	\$200.00	\$600.00
		<b>Total Civil Penalties</b>	\$79,000.00

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 extended and ongoing period of non-compliance as well as the mandated regulatory assessment of daily penalties for unauthorized injection pursuant to Regulations section 1724.13, subsection (c).

In addition, the Supervisor is exercising his discretion to limit the civil penalties imposed by this Order to violations for unauthorized injection which occurred after September 8, 2023, on a per well basis. Further, regardless of the number of days of unauthorized injection, the Supervisor is imposing a civil penalty for only one violation of Regulations section 1777, subdivision (c)(4), for failure to disconnect injection lines, on a per well basis.

Nothing in this Order is intended nor shall it be construed to limit or preclude CalGEM from taking any action authorized by law, including imposing civil penalties for the other violations addressed by this Order.

**IV. Operator's Required Actions**

For the reasons stated herein, pursuant to the PRC sections 3013, 3106, 3224, and 3236.5, and Regulations sections 1724.6, 1724.10, 1724.10.1, 1724.13, and 1777, **IT IS HEREBY ORDERED** that Operator:

- 1) As soon as it is safe to do so, cease injection into and disconnect the injection lines from all wells without current injection approval.
- 2) Immediately submit the February 6, 2026, MIT Part Two test results for well Tejon Ranch 24 (API 0403046608). Test results can be submitted in CalGEM's Well Statewide Tracking and Reporting System (WellSTAR).

1 3) Within thirty (30) days from the date this Order is issued, pay civil penalties in the  
2 amount of seventy-nine thousand dollars (\$79,000.00).

3 Daily violations and penalties may continue to accrue if these requirements are not addressed  
4 to CalGEM's satisfaction.

5 To remit payment of the civil penalties online, please visit  
6 <https://www.govone.com/PAYCAL/Home/SelectAgency> and select "California Department  
7 of Conservation Geologic Energy Management Division," then follow the instructions on the  
8 screen. When filling out the "order number" field, please type the order number followed by  
9 the letter "O."

10 To remit payment of the civil penalties by mail, please send a check payable to  
11 "Department of Conservation" to the following address:

12 Department of Conservation  
13 CalGEM, Attn: Operational Management Unit  
14 715 P Street, MS 18-03  
15 Sacramento, California 95814

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

18 Please contact Daniel Woldemariam via email at  
19 [Daniel.Woldemariam@conservation.ca.gov](mailto:Daniel.Woldemariam@conservation.ca.gov) with any questions concerning the violations and  
20 to confirm compliance with Required Actions #1 and #2.

21 For wells without current injection approval, injection operations shall not resume  
22 without subsequent written approval from CalGEM. (Regulations, §§ 1724.6, subd. (e), 1724.10,  
23 subd. (i)(4), 1724.10.1, subd. (a) & (e), 1724.10.2, 1724.13, subd. (b).)

24 **V. Operator's Appeal Rights**

25 Operator may appeal this Order by filing a timely written notice of appeal with the  
26 Director as described in Article 6 (Appeals and Review) of Division 3 of the PRC, commencing  
27 with the PRC section 3350. (PRC, § 3225, subd. (d).) If this Order is mailed to you, the Director  
28 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 email to:

[OfficeofAppeals@conservation.ca.gov](mailto:OfficeofAppeals@conservation.ca.gov)

or 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

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.

**VI. 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.)

DATED: 6/24/2026

Doug Ito  
Doug Ito  
State Oil and Gas Supervisor