

1 Department of Conservation, Geologic Energy Management Division
Doug Ito
2 STATE OIL AND GAS SUPERVISOR
715 P Street, MS 19-06 (Legal Office)
3 Sacramento, California 95814
Telephone (916) 323-6733
4
5
6
7

8 **STATE OF CALIFORNIA**
9 **NATURAL RESOURCES AGENCY**
10 **DEPARTMENT OF CONSERVATION**
11 **GEOLOGIC ENERGY MANAGEMENT DIVISION**
12

13
14 **ORDER TO PLUG AND ABANDON WELLS, DECOMMISSION**
15 **ATTENDANT FACILITIES, AND RESTORE WELL SITE**
16 **NO. 1663**
17

18 **Operator: West Side Rentals (W1400)**

19 **Field: Riverdale**

20 **District: Central**

21 **County: Fresno**
22
23
24
25
26
27
28

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 or production facility. (PRC, § 3237, subd. (a).) An operator's failure to conduct a fluid level test for idle wells in accordance with Regulations section 1772.1, subdivision (a)(1), is conclusive evidence of desertion. (PRC, § 3206.1, subds. (d) and (e).) An operator's failure to conduct a casing pressure test in accordance with Regulations section 1772.1, subdivision (a)(2), is conclusive evidence of desertion. (PRC, § 3206.1, subds. (d) and (e).) An operator's failure to maintain the well site in good condition and in a manner to prevent leakage or corrosion and to safeguard life, health, property, and natural resources in accordance with Regulations section 1777, subdivision (a) with respect to its operational history is credible evidence of desertion. (PRC, § 3237, subds. (a)(2).) Based upon conclusive evidence of desertion and credible evidence of desertion described below, the Supervisor has determined that the Well and associated Production Facilities (the "**Well**" and "**Facilities**") identified on **Attachment A** incorporated herein, are deserted.

At all relevant times, West Side Rentals (**Operator**) has been the "operator" (as defined in PRC section 3009) and is responsible for the Well. CalGEM has determined, based on conclusive and credible evidence, that Operator has deserted the Well and Facilities. As a result, Operator is responsible (as specified in PRC section 3237, subdivision (c)(1)) for the plugging and abandonment of the Well, the decommissioning of the Facilities, and the restoration of the well site for the Well.

CalGEM records show that, pursuant to Regulations sections 1772.1, Operator was required to conduct a fluid-level test and casing pressure test to ensure compliance for the Well. However, Operator has failed to fulfill these requirements. CalGEM records indicate that, under applicable provisions of PRC section 3206, Operator was required to timely pay idle well

1 fees for the Wells for years 2023 through 2025, and that Operator has not done so. These
2 failures provide conclusive evidence of desertion, leading the Supervisor to determine that the
3 Well is deserted.

4 CalGEM records indicate that Operator has demonstrated credible evidence of
5 desertion by its operational history by failure to comply with multiple provisions of the Public
6 Resources Code and Regulations, including failure to maintain production facilities in a
7 manner to safeguard life, health, property, and natural resources. These failures provide
8 credible evidence of desertion, leading the Supervisor to determine that the Well is deserted.
9 Therefore, pursuant to PRC sections 3106, 3206, 3206.1, 3224, 3226, and 3237, the Supervisor is
10 ordering Operator to plug and abandon the Well, decommission the Facility, and restore the
11 well site for the Well, consistent with all applicable requirements, including PRC sections 3206,
12 3208, 3228, 3229 and 3230; Regulations sections 1722, 1723 through 1723.8, 1724 through
13 1724.1, 1760, 1775 and 1776; and the conditions included in any permit or approval CalGEM
14 may issue pursuant to PRC section 3229; and until that work is complete, perform remedial
15 work and testing as necessary to prevent damage to life, health, property, and natural
16 resources.

17 **Attachment B**, incorporated herein, contains a list of definitions and authorities that are
18 applicable to this Order.

19 **Evidence of Desertion of the Wells**

20 **A. Conclusive Evidence of Desertion**

21 PRC section 3206.1, subdivision (e), provides that failure to comply with any
22 requirements of the regulations implementing this section (e.g., Regulations, § 1772.1, subds.
23 (a)(1), (a)(2), and (b)), shall be conclusive evidence of desertion of the Well, permitting the
24 Supervisor to order the Well abandoned pursuant to PRC section 3237. Operator failed to
25 comply with these requirements, and this failure constitutes conclusive evidence that the Well
26 and Facilities are deserted.

27 On December 1, 2019, CalGEM designated the Well as "idle". Therefore, at all times
28 relevant to this Order, the Well was an "idle well" as defined in PRC section 3008, subdivision

(d). As the operator of the Well, 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 2022 by May 1, 2023, as provided in the 2023 Idle Well Fee Invoice prepared by CalGEM; 2023 by May 1, 2024, as provided in the 2024 Idle Well Fee Invoice prepared by CalGEM; and 2024 by May 1, 2025, as provided in the 2025 Idle Well Fee Invoice prepared by CalGEM. (PRC, § 3206, subd. (a).) As of the date of this order, Operator has not paid its idle well fees for its Well idle in 2022, 2023, and 2024. (**Attachments F, G, H, and K** incorporated herein.) Operator's failure to pay the required idle well fees for the Well is conclusive evidence of desertion. (PRC, § 3206, subd. (c).)

B. Idle Well Violations Supporting Conclusive Evidence of Desertion

Because the Well is an idle well, Operator was required to conduct idle well testing required by Regulations section 1772.1, subdivision (a).

1. Failure To Conduct Fluid Level Testing (Regulations, § 1772.1, subd. (a)(1))

Within 24 months of a well becoming an idle well, Operator shall conduct a fluid-level test for all idle wells, pursuant to Regulations section 1772.1, subdivision (a)(1). To date, CalGEM has not received any evidence indicating that Operator conducted the fluid level testing (**Attachment I**, incorporated herein). As a result, Operator has failed to comply with the requirements of Regulations section 1772.1, subdivision (a)(1).

API	Well Designation	Idle Date	Fluid Level by Due Date
0401920670	Spolsdoff 1-27	12/01/2019	12/1/2021

2. Failure To Conduct Casing Pressure Test (Regulations, § 1772.1, subd. (a)(2))

Within 24 months of a well becoming an idle well, Operator shall conduct a casing pressure test, pursuant to Regulations section 1772.1, subdivision (a)(2). The casing pressure test for the well was due starting December 1, 2021, as indicated in the table below. To date, CalGEM has not received any records indicating a casing pressure test was performed. As a result,

Operator has failed to comply with the requirements of Regulations section 1772.1, subdivision (a)(2).

API	Well Designation	Idle Date	Casing Pressure Test by Due Date
0401920670	Spolsdoff 1-27	12/01/2019	12/1/2021

3. Failure To Remediate After Failing to Successfully Complete Idle Well Testing (Regulations, § 1772.1, subd. (b))

Within 12 months of failing to conduct a successful casing pressure test pursuant to Regulations section 1772.1, subdivision (a)(2), Operator was required to do one of the following: (1) bring the Wells into compliance, (2) partially plug and abandon the Wells in accordance with Regulations section 1752, (3) plug and abandon the Wells in accordance with PRC section 3208, or (4) schedule the Wells for plugging and abandonment under an approved Idle Well Management Plan or an approved Testing Waiver Plan. (Regulations, § 1772.1, subd. (b).).

API	Well Designation	Casing Pressure Test Due	Remediation Due Date
0401920670	Spolsdoff 1-27	12/1/2021	12/1/2022

Regulations section 1772.1, subdivision (b), provides that operators shall remediate idle wells after failing to successfully perform idle well testing on them, including failing to conduct a successful casing pressure test with Regulations section 1772.1, subdivision (a)(2). The remediation for each of the Wells was due as indicated in the table above. To date, Operator has not remediated any of the Wells. As a result, Operator has failed to comply with the requirements of Regulations section 1772.1, subdivision (b).

In conclusion, the above idle well violations constitute conclusive evidence of desertion and permits the Supervisor to order the Well plugged and abandoned.

///

///

C. Credible Evidence of Desertion

Credible evidence of desertion arises based on the operational history of the well or production facility and due to an Operator's lack of response to the Supervisor and District Deputy to inquiries and requests (PRC, § 3237, subd. (a)(2)). Operator's failure to maintain its production facilities and failure to provide and maintain communication with CalGEM, as required by PRC Section 3237, provides credible evidence that the Well is deserted.

On or about January 20, 2026, and July 1, 2026, CalGEM conducted inspections of the Well and Facilities where the violations described below were observed and documented in the Riverdale Field. (**Attachments C, D, E, and L** incorporated herein.) CalGEM records reflect Operator has not maintained compliance with applicable requirements for operation of the Well and the Facilities.

1. Failure to Cover Sump. (Regulations, § 1770, subd. (b)(3).)

Sumps shall be designed, constructed, and maintained so as not to be a hazard to people, livestock, or wildlife including birdlife. Operators are required to cover the sump with screening to restrain entry of wildlife in accordance with Regulations section 1778, subdivision (d). (Regulations, § 1770, subd. (b)(3).)

During the inspection, CalGEM observed the sump was open and observed wildlife take in sump fluid, in violation of Regulations, section 1770, subdivision (b)(3), at the following production facilities:

Facility Setting ID	Facility Setting Name	District	Facility (Component) ID	Facility (Component) Name	Facility (Component) Type
90319777	Sump	Central	Unspecified	Unspecified	Sump

As of the date of this Order, CalGEM does not have any records from Operator demonstrating that the violations were corrected.

2. Tank Maintenance and Inspections. (Regulations, § 1773.3, subds. (b) and (c).)

Operators shall inspect in-service tanks at least once a month for the following:

(1) Leakage at the base, seams, associated piping, tank shell plugs, or any other fitting that could leak. (Regulations, § 1773.3, subd. (b)(1).)

(2) The presence of corrosion or shell distortions. (Regulations, § 1773.3, subd. (b)(2).)

During the inspection, CalGEM observed oil saturated soil indicating a leak, corrosion at the base of the tanks, and fluid present around the base of the tanks. Leaking tanks shall be reported to the appropriate Division district office within 48 hours and shall be taken out of service and designated as an Out-of-Service tank per Regulations, section 1773.3, subdivision (c). The following production facility shall be taken out of service:

Facility Setting ID	Facility Setting Name	District	Facility (Component) ID	Facility (Component) Name	Facility (Component) Type
902963136	Unspecified	Central	12018	4	Tank

As of the date of this Order, CalGEM does not have any records from Operator demonstrating that the violation was corrected.

3. Failure to Keep Well Cellar Drained. (Regulations, § 1777, subd. (c)(3).)

The well cellar is an excavated area around the wellhead that provides space for equipment at the top of the wellbore. Operators are required to keep well cellars drained. (Regulations, § 1777, subd. (c)(3).)

During the inspection, CalGEM observed fluids in the well cellar, in violation of Regulations, section 1777, subd. (c)(3), at the following Well:

API	Well Designation
0401920670	Spolsdoff 1-27

As of the date of this Order, CalGEM does not have any records from Operator demonstrating that the violation has been corrected.

4. Failure to remove oilfield waste and refuse. (Regulations § 1775, subds. (a) and (c).)

Oilfield waste shall be disposed of in such a manner as not to cause damage to life, health, property, freshwater aquifers or surface waters, or natural resources, or be a menace to public safety. (Regulations, § 1775, subd. (a).) Unused equipment and scrap attendant to oilfield

operations shall be removed from production or injection operations to prevent damage to life, health, or property, or become a public nuisance or a menace to public safety. (Regulations, § 1775, subd. (c).)

During the inspection, CalGEM observed oilfield waste and refuse that had not been properly disposed of, in violation of Regulations, sections 1775, subdivision (a), at the following production facility:

Facility Setting ID	Facility Setting Name	District	Facility (Component) ID	Facility (Component) Name	Facility (Component) Type
90296136	Unspecified	Central	12019	5	Tank

As of the date of this Order, CalGEM does not have any records from Operator demonstrating that the violation was corrected.

5. Failure to Submit Annual Production Report (PRC, § 3406)

PRC section 3406 provides that on or before March 15th of each year, Operator is required to file a report with the department. To date, CalGEM has not received an Annual Production Report therefore, Operator has failed to comply with the requirements of PRC section 3406. (**Attachment J**, incorporated herein.)

6. Failure to maintain production facilities (Regulations, §1777(a))

Operator has failed to maintain the facilities in good condition and failed prevent leakage or corrosion to safeguard life, health, property and natural resources. CalGEM conducted inspections of the Well and Facilities where the violations described were observed and documented in the Riverdale Field between two visits, on or around January 20, 2026, and June 17, 2026, respectively. (**Attachments D, and L** incorporated herein.)

II. Operator's Required Actions

For the reasons stated herein, CalGEM has determined that the Wells are deserted. Therefore, pursuant to PRC sections 3106, 3206.1, 3224, 3226, and 3237, **IT IS HEREBY ORDERED** that Operator plug and abandon the Wells, decommission the Facilities, and restore the well

1 site for the Wells consistent with all applicable requirements of PRC sections 3208, 3224, 3228,
2 3229, and 3230; Regulations section 1722, 1723 through 1723.8, 1724 through 1724.1, 1760, 1775
3 and 1776; and the conditions included in any permit CalGEM may issue pursuant to PRC
4 section 3229. Until that work is complete, Operator is ordered to perform remedial work and
5 testing on the Wells as necessary to prevent damage to life, health, property, and natural
6 resources.

7 **III. Operator's Appeal Rights**

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

14 Department of Conservation
15 Director's Office of Appeals
16 715 P Street, MS 19-06 (Legal Office, Chief Counsel)
17 Sacramento, California 95814

18 Or via electronic mail:

19 OfficeofAppeals@conservation.ca.gov

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

23 If Operator does not file a timely written notice of appeal, or if the order is affirmed
24 following an appeal, this Order will become a final order and CalGEM may contract for
25 performance of the work, pursuant to PRC section 3226, if, within 30 days of this Order,
26 Operator has not, in good faith, commenced the work ordered. Any costs incurred by
27 CalGEM to obtain compliance with this Order (which may include penalties and interest) will
28 constitute a lien against Operator's property per PRC section 3423. (PRC, § 3356.)

///

1 **IV. Consequences of Non-Compliance**

2 Failure to comply with Section II (Operator's Required Actions) of this Order could
3 subject Operator to further enforcement action. PRC section 3236 makes it a misdemeanor for
4 any person who violates, fails, neglects, or refuses to comply with any of the provisions of the
5 oil and gas conservation laws commencing at PRC section 3000. PRC sections 3236.2 and
6 3236.3 authorizes the Supervisor to refer for civil penalties and injunctive relief for failure to
7 comply with an order or for violation of any provision in Chapter 1 of Division 3 of the PRC or
8 any regulation that implements those statutes. PRC section 3236.5 authorizes the Supervisor to
9 impose a civil penalty on a person who violates any provision in Chapter 1 of Division 3 of the
10 PRC or any regulation that implements those statutes, and the Supervisor may in the future
11 impose further civil penalties based on the facts and omissions underlying this Order. PRC
12 section 3237 authorizes the Supervisor to order the plugging and abandonment of a well or
13 the decommissioning of a production facility if an operator has failed to comply with an order
14 of the Supervisor within the time provided by the order or has failed to challenge the order on
15 a timely basis. PRC section 3359 makes it a misdemeanor to fail or neglect to comply with an
16 order of the Supervisor. Each day's further failure, refusal, or neglect is a separate and distinct
17 offense. (PRC, § 3359.) By issuance of this Order, the Supervisor does not waive the right to take
18 further enforcement actions.

19
20
21 DATED: 7/30/2026

Doug Ito

Doug Ito
State Oil and Gas Supervisor