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

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 SITE NO. 1693

Operator: Leah C. Sewell & Barbara C. Jones (05247)

Field: Newhall

Northern District, Los Angeles County

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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).)

At all relevant times, Leah C. Sewell & Barbara C. Jones (**Operator**) has been the "operator" (as defined in PRC section 3009) of the idle wells (**Wells**) and the production facilities attendant to the Wells (**Facilities**) described in **Attachment A**, incorporated herein. CalGEM has determined, based upon rebuttable presumptions and conclusive evidence of desertion, that Operator has deserted the Wells and Facilities. As a result, Operator is responsible (as specified in PRC section 3237, subdivision (c)(1)) for the plugging and abandonment of the Wells, the decommissioning of the Facilities, and the restoration of the well site for the Wells.

Therefore, pursuant to PRC sections 3013, 3106, 3206, 3206.1, 3224, 3226, and 3237, the Supervisor is ordering Operator to plug and abandon the Wells, decommission the Facilities, and restore the well site 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, 1775, and 1776; and the conditions included in any permit or approval CalGEM may issue pursuant to PRC section 3229.

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

II. Evidence of Desertion of the Wells

A. Conclusive Evidence of Desertion

CalGEM records indicate that, under applicable provisions of PRC sections 3206 and 3206.1, Operator has demonstrated conclusive evidence of desertion of the Wells in its failure to comply with multiple provisions of the PRC and Regulations.

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1. Failure To Pay Idle Well Fees (PRC § 3206, subd. (c))

PRC section 3206, subdivision (c), provides that failure to file the required idle well fee shall be conclusive evidence of desertion of the Wells pursuant to PRC section 3237.

Based on CalGEM's records, at all times relevant to this Order, Operator was the "operator" of the Wells, as defined in PRC section 3009. At all times relevant to this Order, the Wells below were each an "idle well" as defined in PRC section 3008, subdivision (d):

API	Well Designation
0403713227	Well No. 9
0403713228	Well No. 10

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 the calendar year 2023 by May 1, 2024, as provided in the 2024 Idle Well Fee Invoice prepared by CalGEM, idle in the calendar year 2024 by May 1, 2025, as provided in the 2025 Idle Well Fee Invoice, and idle in the calendar year 2025 by May 1, 2026, as provided in the 2026 Idle Well Fee Invoice. (**Attachments C, D,** and **E,** incorporated herein.)

As of the date of this order, Operator has not paid its idle well fees for its Wells idle in the calendar years 2023, 2024, and 2025. Operator's failure to pay the required idle well fees for the Wells is conclusive evidence of desertion. (PRC, § 3206, subd. (c).)

2. Failure to Comply with Idle Well Testing (PRC § 3206.1, subd. (e), and Regulations §§ 1772.1; 1772.1.4, subd. (b))

Pursuant to Regulations sections 1772.1 and 1772.1.4, Operator was required to submit an Idle Well Testing Compliance Work Plan (**TCWP**) and meet the testing benchmarks. PRC section 3206.1, subdivision (e), provides that failure to comply with any requirements of the regulations implementing idle well testing and management requirements shall be conclusive evidence of desertion of the Wells, permitting the Supervisor to order the Wells abandoned.

Because the Wells were each an idle well, Operator was required to submit an Idle Well TCWP and comply with the testing requirements for each of the Wells. Operator failed to

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submit a TCWP or comply with the testing requirements as required by Regulations sections 1772.1 and 1772.1.4, subdivision (b).

Operator's failure to submit a TCWP, failure to meet the testing requirements, and failure to remediate any idle well in accordance with Regulations section 1772.1, subdivision (b), is conclusive evidence of desertion. (PRC, § 3206.1, subds. (d) and (e).) Operator failed to comply with these requirements, and this failure constitutes conclusive evidence that the Wells and Facilities are deserted.

B. Rebuttable Evidence of Desertion

A rebuttable presumption of desertion arises if an operator removes production facilities and injection equipment from the wellsite for at least two years (PRC, § 3237, subd. (a)(3)(B)), fails to designate an agent (PRC, § 3237, subd. (a)(3)(D), and fails to maintain access routes (PRC, § 3237, subd. (a)(3)(F)). Operator's failure to upkeep production equipment, maintain access routes, and designate an agent create a rebuttable presumption that the Wells are deserted.

1. Desertion of Well Site (PRC, § 3237, subd. (a)(3)(B))

Based on CalGEM's records, Operator's production and injection equipment has been removed from the wellsite for at least two years. Operator's lack of production or injection equipment on the wellsite constitutes rebuttable evidence that the Wells and Facilities are deserted. (PRC, § 3237, subd. (a)(3)(B).)

2. Failure to Designate an Agent (PRC, § 3237, subd. (a)(3)(D))

Based on CalGEM's records, Operator failed to designate an agent, as required by Section 3200. Operator's failure to designate an agent constitutes rebuttable evidence that the Wells and Facilities are deserted. (PRC 3237, subdivision (a)(3)(D).)

3. Failure to Maintain Access Route. (PRC, § 3237, subd. (a)(3)(F))

Vehicle access routes to all production facilities must be maintained in a safe and passable condition, pursuant to Regulations section 1777, subdivision (f). Poorly maintained

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and impassable access roads are rebuttable evidence of desertion. (PRC §3237, subd. (a)(3)(F).

During the inspection on or about July 22, 2026, (**Attachments F** and **G,** incorporated herein), CalGEM observed the access routes in an unsafe and not passable condition at the following Wells:

API	Well Designation
0403713227	Well No. 9
0403713228	Well No. 10

Operator's lack of maintenance of access routes to the Wells constitutes rebuttable evidence that the Wells and Facilities are deserted.

III. Operator's Required Actions

For the reasons stated herein, CalGEM has determined that the Wells are deserted. Therefore, pursuant to PRC sections 3013, 3106, 3206, 3206.1, 3224, 3226, and 3237, **IT IS HEREBY ORDERED** that Operator plug and abandon the Wells, decommission the Facilities, and restore the well site for the Wells consistent with all applicable requirements of PRC sections 3208, 3224, 3228, 3229, and 3230; Regulations sections 1722, 1723 through 1723.8, 1724 through 1724.1, 1775, and 1776; and the conditions included in any permit CalGEM may issue pursuant to PRC section 3229.

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 PRC section 3350. (PRC, §§ 3225, subd. (d); 3236.5, subd. (c); 3237, subd. (b).) If this Order is mailed to you, the Director must receive the appeal within (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

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Or via electronic mail:

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.

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

V. Consequences of Non-Compliance

Failure to comply with Section III (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 sections 3236.2 and 3236.3 authorizes the Supervisor to refer for civil penalties and injunctive relief for failure to comply with an order or for violation of any provision in Chapter 1 of Division 3 of the PRC or any regulation that implements those statutes. 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

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offense. (PRC, § 3359.) By issuance of this Order, the Supervisor does not waive the right to take further enforcement actions.

DATED: 11/5/2026

Cari Anderson

Cari Anderson
CalGEM Enforcement Chief, on behalf of the State Oil and Gas Supervisor