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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 PLUG AND ABANDON WELLS, DECOMMISSION**
15 **ATTENDANT FACILITIES, AND RESTORE WELL SITE**
16 **NO. 1645**

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18 **Operator: Glenn Woodward (03452)**

19 **Field: Unspecified**

20 **District: Central**
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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 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 submit an Idle Well Testing Compliance Work Plan, failure to meet the testing benchmarks of an Idle Well Testing Compliance Work Plan, failure to remediate any idle well, in accordance with Regulations section 1772.1, subdivision (b), or wells being idle for more than 25 years, is conclusive evidence of desertion. (PRC, §§ 3206.1, subds. (d) and (e), 3237, subd. (d)(1).) Based upon conclusive evidence of desertion and rebuttable presumption of desertion, described below, the Supervisor has determined that the Wells is deserted.

At all relevant times, Glenn Woodward (**Operator**) has been the "operator" (as defined in PRC section 3009) of the long-term idle well (**Well**) and the production facility attendant to the Well (**Facility**) described in **Attachment A**, incorporated herein. CalGEM has determined, based on conclusive and rebuttable evidence, that Operator has deserted the Well and Facility. 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 Facility, and the restoration of the well site for the Well.

CalGEM records show that, pursuant to Regulations sections 1772.1 and 1772.1.4, Operator was required to submit an Idle Well Testing Compliance Work Plan, meet the testing benchmarks outlined in the Idle Well Testing Compliance Work Plan, and remediate the Well. However, Operator has failed to fulfill these requirements. Furthermore, CalGEM records indicate that the Operator has never paid idle well fees pursuant to the applicable provisions of PRC section 3206. These failures provide conclusive evidence of desertion, leading the Supervisor to determine that the Well and Facility is deserted.

1 Therefore, pursuant to PRC sections 3106, 3206.1, 3224, 3226, and 3237, the Supervisor is
2 ordering Operator to plug and abandon the Well and restore the well site for the Well,
3 consistent with all applicable requirements, including PRC sections 3206, 3208, 3228, 3229,
4 3230, 3237, 3285, and 3406; Regulations sections 1722, 1753, 1772, 1773, 1775, and 1777; and
5 the conditions included in any permit or approval CalGEM may issue pursuant to PRC section
6 3229; and until that work is complete, perform remedial work and testing as necessary to
7 prevent damage to life, health, property, and natural resources.

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

10 II. There is Evidence of Desertion of the Wells

11 A. Conclusive Evidence of Desertion

12 PRC section 3206.1, subdivision (e), provides that failure to comply with any
13 requirements of the regulations implementing this section (e.g., Regulations, §§ 1772.1, subds.
14 (a)(1), 1772.1, subds. (a)(2), 1772.1, subds. (b), 1772.1.4, subds. (b),)), shall be conclusive
15 evidence of desertion of the Well, permitting the Supervisor to order the Well abandoned
16 pursuant to PRC section 3237. Operator failed to comply with these requirements, and this
17 failure constitutes conclusive evidence that the Well and Facility is deserted.

18 Based on CalGEM's records, at all times relevant to this Order, Operator was the
19 "operator" of the Well, as defined in PRC section 3009. CalGEM designated the Well as "idle".
20 Therefore, at all times relevant to this Order, the Well was an "idle well" as defined in PRC
21 section 3008, subdivision (d). As the operator of the Well, following the process for idle well
22 management set forth in PRC section 3206, subdivision (a), Operator did not submit an Idle
23 Well Management Plan in lieu of paying idle well fees. Operator has never paid an idle well
24 fee as required by PRC section 3206, subdivision (c). Operator's history indicates the well was
25 deemed non-productive and deserted (PRC, § 3237, subd. (a)(2)), **Attachment C**,
26 incorporated herein.

1 Idle Well Violations Supporting Conclusive Evidence of Desertion

2 Because the Well is an idle well, Operator was required to submit an idle well Testing
3 Compliance Work Plan (TCWP) and comply with the testing benchmarks of the TCWP for the
4 Well. Operator failed to submit a TCWP or comply with the testing benchmarks of that plan as
5 required by Regulations section 1772.1.4, subdivision (b).

6 1. Failure to submit an Idle Well Testing Compliance Work Plan (Regulations, § 1772.1.4,
7 subd. (a))

8 Regulations section 1772.1.4, subdivision (a), provides that operators shall submit a
9 TCWP by June 1, 2019, for all wells that are idle as of April 1, 2019. To date, CalGEM has not
10 received a TCWP from Operator for the Well. Operator has failed to comply with the
11 requirements of Regulations section 1772.1.4, subdivision (a).

12 2. Failure to Meet Idle Well Testing Compliance Work Plan Benchmarks Due to Failure
13 to Casing Pressure Test and Perform Clean Out Tag (Regulations, §§ 1772.1, subds.
14 (a)(2) and 1772.1.4, subd. (b)).

15 Regulations section 1772.1.4, subdivision (b), provide that operators shall comply with
16 conducting annual testing benchmarks of well under a TCWP. The casing pressure testing and
17 performance of a clean out tag on each well, as required by the TCWP, were due starting
18 April 1, 2020, until April 1, 2024. (Regulations, §§ 1772.1, subds. (a)(2) and 1772.1.4, subd. (b).) To
19 date, CalGEM has not received evidence of casing pressure testing or performance of clean
20 out tags for the Well. Therefore, Operator has failed to comply with the requirements of
21 Regulations section 1772.1.4, subdivision (b).

22 3. Failure to Perform Casing Pressure Test (Regulations, §§ 1772.1, subd. (a)(2)).

23 Regulations section 1772.1, subdivision (a)(2), provides that within 24 months of a well
24 becoming an idle well, the Operator shall conduct a casing pressure test on the well
25 according to the parameters of the Regulation. The casing pressure test on the well was due
26 starting April 1, 2021, until December 1, 2022. (Regulations § 1772.1, subd. (a)(2)). To date,
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1 CalGEM has not received evidence of casing pressure testing for the Well. Therefore, Operator
2 has failed to comply with the requirements of Regulations section 1772.1, subd. (a)(2).

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

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

12 Regulations section 1772.1, subdivision (b), provides that operators shall remediate idle
13 wells after failing to successfully perform idle well testing on them, including failing to conduct
14 a successful casing pressure test and cleanout tag consistent with Regulations section 1772.1,
15 subdivisions (a)(1) and (a)(2). To date, Operator has not remediated the Well. As a result,
16 Operator has failed to comply with the requirements of Regulations section 1772.1, subdivision
17 (b).

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19 B. Credible Evidence of Desertion

20 Credible evidence of desertion arises if an operator's history indicates the well is non-
21 productive and deserted and due to an Operator's lack of response to the Supervisor and
22 District Deputy to inquiries and requests (PRC, § 3237, subd. (a)(2)). Operator's failure to
23 provide and maintain communication with CalGEM, as required by PRC 3237, is credible
24 evidence that the Well is deserted.

25 C. Rebuttable Evidence of Desertion

26 A rebuttable presumption of desertion arises if an operator has removed a well's
27 production facilities or injection equipment from the well site for at least two years (PRC, §
28 3237, subd. (a)(3)(B)), failed to designate an agent of record (PRC, § 3237, subd. (a)(3)(D)),

1 failed to comply with PRC 3202, subject to a purchase, transfer, assignment, conveyance,
2 exchange, or other disposition (PRC § 3237 (a)(3)(E)), and failed to maintain an access road
3 (PRC § 3237 (a)(3)(F)). Operator's failure to have equipment for over 90 years and provide and
4 maintain the aforementioned documentation on file with CalGEM, as required by PRC 3237,
5 creates a rebuttable presumption that the Well is deserted.

6 1. Failure to remove oilfield waste and refuse. (Regulation § 1775, subd. (a).)

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

10 During the inspection, CalGEM observed oilfield waste and refuse that had not been
11 properly disposed of, in violation of Regulations, sections 1775, subdivision (a).

12 2. Failure to Maintain Access Route. (Regulations, § 1777, subd. (f).)

13 Vehicle access routes to all production facilities must be maintained in a safe and
14 passable condition. (Regulations, § 1777, subd. (f).)

15 During the inspection, CalGEM observed the access route in an unsafe and unpassable
16 condition, in violation of Regulations section 1777, subd. (f).

17 3. Failure to Maintain Production Facilities in Good Condition (Regulations, § 1777,
18 subd. (a).)

19 Operators shall maintain production facilities in good condition and in a manner to
20 prevent leakage or corrosion and to safeguard life, health, property, and natural resources.
21 (Regulations, § 1777, subd. (a).)

22 During the inspection, CalGEM observed leaking coming from the bull plug, in violation
23 of Regulations, section 1777, subd. (a).

24 4. Failure to Identify Well (Regulations, § 1722.1.1, subd. (a).)

25 Each well location shall have posted in a conspicuous place a clearly visible, legible,
26 permanently affixed sign with the name of the operator, name or number of the lease, and
27 number of the well. These signs shall be maintained on the premises from the time drilling
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1 operations cease until the well is plugged and abandoned. (Regulations, § 1722.1.1 subd.
2 (a).)

3 During the inspection of the facility, (**Attachment D**, incorporated herein), CalGEM
4 observed the missing identifying well sign, in violation of Regulations, section 1722.1.1, subd.
5 (a).

6 **III. Operator's Required Actions**

7 For the reasons stated herein, CalGEM has determined that the Wells are deserted.
8 Therefore, pursuant to PRC sections 3106, 3206.1, 3224, 3226, 3237, and 3285, **IT IS HEREBY**
9 **ORDERED** that Operator plug and abandon the Wells, decommission the Facilities, and restore
10 the well site for the Well consistent with all applicable requirements of PRC sections 3208, 3224,
11 3228, 3229, and 3230; Regulations section 1722, 1753, 1772, 1773, 1775, and 1777; and the
12 conditions included in any permit CalGEM may issue pursuant to PRC section 3229. Until that
13 work is complete, Operator is ordered to perform remedial work and testing on the Wells as
14 necessary to prevent damage to life, health, property, and natural resources.

15 **IV. Operator's Appeal Rights**

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

22 Department of Conservation
23 Director's Office of Appeals
24 715 P Street, MS 19-06 (Legal Office, Chief Counsel)
25 Sacramento, California 95814

26 Or via electronic mail:

27 OfficeofAppeals@conservation.ca.gov

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

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

10 **V. Consequences of Non-Compliance**

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

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DATED: 6/18/2026

Doug Ito
Doug Ito
State Oil and Gas Supervisor