

California 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
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STATE OF CALIFORNIA
NATURAL RESOURCES AGENCY
DEPARTMENT OF CONSERVATION
GEOLOGIC ENERGY MANAGEMENT DIVISION

TERMS OF SATISFACTION OF ORDER TO PAY CIVIL PENALTIES
NO. 1673

Operator: Sentinel Peak Resources California LLC (\$2641)

This Terms of Satisfaction (**Satisfaction**) is made by and between the State Oil and Gas Supervisor (**Supervisor**), acting through the California Geologic Energy Management Division (**CalGEM**), and Sentinel Peak Resources California LLC (**SPR**), collectively, the "Parties." This Satisfaction will become effective as of the last date of execution below (**Effective Date**).

Recitals

1. CalGEM supervises the drilling, operation, maintenance, and plugging and abandonment of oil, gas, and geothermal wells in the State of California.

2. CalGEM has prepared Order to Pay Civil Penalties, No. 1673, which would impose civil penalties on SPR in the amount of \$4,233,600 for alleged violations of Regulations sections 1724.10, 1724.10.1, 1724.10.2, 1724.13, and 1777. A copy of Order No. 1673 is included herein as **Exhibit A**.
3. SPR is the operator (as defined by Public Resources Code [PRC] section 3009) of the injection wells (as defined in California Code of Regulations, title 14 [Regulations], section 1720.1, subdivision (f)) identified on SPR's Organization Detail page in CalGEM's Well Statewide Tracking and Reporting System (collectively, the **Wells**).
4. SPR has had the opportunity to review Order No. 1673 and does not dispute the allegations therein.
5. The Supervisor acknowledges that prior to CalGEM issuing Order No. 1673, and immediately upon SPR's internal verification of said violations, SPR voluntarily contacted CalGEM in good faith, admitted to the violations, and provided information indicating a rapid proactive response at its own economic detriment, and that diligent corrective actions were being taken to remediate the underlying reasons for the violations.
 - a. In October 2025, as a result of an internally-initiated companywide evaluation of SPR's compliance with mechanical integrity testing (**MIT**) requirements, SPR executive management became aware of a material MIT compliance issue with Wells at SPR's Arroyo Grande field in San Luis Obispo County.
 - b. In response, SPR immediately removed the non-compliant Wells from operation; deployed additional resources and management personnel to support efforts to bring the field into compliance and coordinate with the CalGEM district office; and within a week of discovering the compliance deficiency, SPR leadership met with CalGEM leadership in Sacramento to report the compliance deficiency, describe actions already taken in response, and outline SPR's plan to regain full compliance.
 - c. In parallel, SPR identified the causes of the failure and took corrective action. These actions included personnel actions, establishing a centralized system for all

MIT compliance-related data, and deploying a common workflow task management system across all operating areas to ensure a standard approach for scheduling and executing MITs.

d. All of the non-compliant Wells subsequently passed their MITs, indicating that no out of zone injection occurred while the Wells were operating outside of the required testing period.

6. In consideration of SPR's forthrightness and willingness to accept responsibility for the violations as well as CalGEM's prioritization of the avoidance of unauthorized injection, the Supervisor finds SPR should be afforded the opportunity to demonstrate ongoing compliance with the above Regulations sections in exchange for a reduction in the civil penalties amount to be imposed by Order No. 1673.

7. The Supervisor and SPR have engaged in settlement discussions and intend by this Satisfaction to settle and conclude all issues raised by and alleged in Order No. 1673.

Terms and Conditions

For good and valuable consideration and incorporating the above recitals, the Supervisor hereby delineates, and SPR hereby agrees to, the following Terms of Satisfaction:

1. Order Issuance. As of the Effective Date of this Satisfaction, the Parties stipulate that the Supervisor has issued and served on SPR Order No. 1673 imposing civil penalties on SPR in the amount of \$4,233,600 for violations of Regulations sections 1724.10, 1724.10.1, 1724.10.2, 1724.13, and 1777, relating to a portion of the Wells identified on Attachment A thereto.
2. Waiver. SPR hereby waives any right of appeal of Order No. 1673 with prejudice.
3. Initial Penalty Amount. SPR shall make an initial payment of \$1,700,000 (the "Initial Payment") to CalGEM within 10 business days of the Effective Date.
4. Penalty Amount Reduction.
 - a. Subject to SPR's timely payment of the Initial Payment and compliance with the reporting requirements described in Section 6, the Supervisor reduces the civil penalties amount imposed by Order No. 1673 by \$2,033,600 such that the total

civil penalties owed shall be \$2,200,000, of which \$1,700,000 shall serve as the Initial Payment, with the remaining \$500,000 (the "Contingent Payment") owed by January 31, 2027 (subject to Section 4.b).

b. If at least one Compliance Well (as defined in Section 5.b) accrues more than 30 days of unauthorized injection during the Compliance Obligation Period (as defined in Section 5.a), SPR shall make the Contingent Payment to CalGEM by January 31, 2027, or a later date at CalGEM's request. Notwithstanding the foregoing, if no Compliance Well accrues more than 30 days of unauthorized injection during the Compliance Obligation Period, the Supervisor shall waive SPR's obligation to make the Contingent Payment.

5. Definitions.

a. The "Compliance Obligation Period" shall be September 1, 2026, through December 31, 2026.

b. The "Compliance Wells" shall mean the portion of the Wells which have, pursuant to Regulations sections 1724.10.1 and 1724.10.2, MITs due during the Compliance Obligation Period. A list of the Compliance Wells is included herein as **Exhibit B**.

c. "Unauthorized injection" shall mean, before receiving CalGEM's written authorization to reinitiate injection, injection into a Compliance Well following, but not limited to:

- i. The Well becoming overdue for a test, or
- ii. The Well failing a test as determined at the time testing was performed, or
- iii. CalGEM's notification to SPR, after review of the test results submitted pursuant to Regulations section 1724.10, subdivision (i)(2), that the Well failed the test performed.

6. Reporting:

- a. Within 10 days after the Compliance Obligation Period ends, SPR shall provide a written compliance report for the Compliance Wells in digital spreadsheet format to CalGEM at UIC.Implementation@conservation.ca.gov.
 - b. The report shall contain all information in the Compliance Well list, in addition to clearly identifiable notations for any unauthorized injection into a Well during the Compliance Obligation Period, as well as any additional data requested by CalGEM.
 - c. Once submitted, CalGEM will review SPR's compliance report to determine compliance with MIT requirements and days of unauthorized injection, if any.
7. Notice. During the Compliance Period, upon discovery of unauthorized injection into any of the Compliance Wells, SPR shall immediately notify CalGEM and confirm that injection has ceased in accordance with Regulations section 1724.13.
8. Payment Options.
- a. SPR may submit payment online by visiting <https://www.govone.com/PAYCAL/Home/SelectAgency> and selecting "California Department of Conservation Geologic Energy Management Division," then following the instructions on the screen. When filling out the "order number" field, type the order number followed by the letter "O." Any online payment will be considered timely if made by 11:59 p.m. of the due date.
 - b. Alternatively, SPR may submit payment by mail by sending a check payable to "Department of Conservation" to the following address:

Department of Conservation
CalGEM, Attn: Operational Management Unit
715 P Street, MS 1803
Sacramento, CA 95814

Include "Sentinel Peak Resources California LLC," "Order No. 1673," and the phrase "Oil and Gas Environmental Remediation Account" on the check itself. A mailed payment will be considered timely if postmarked on or before the due date.

9. SPR understands that taking the actions set forth in this Satisfaction is not a substitute for compliance with applicable laws. SPR further understands that any violations of applicable statutory or regulatory requirements may subject SPR to enforcement action, including an order to pay civil penalties. Failure to comply with the terms of this Satisfaction may subject SPR to civil penalties as provided by Public Resources Code section 3236.5 and other applicable provisions of law. By agreeing to this Satisfaction, the Supervisor does not waive the right to take further enforcement actions for violations of applicable statutory or regulatory requirements that occur after the Effective Date of this Satisfaction. The Supervisor expressly waives the right to seek additional penalties for the same conduct and time period alleged in Order No. 1673.

10. This Satisfaction constitutes the entire agreement between SPR and the Supervisor as to the matters addressed herein and supersedes and replaces any and all prior negotiations and agreements of any kind, whether written or oral, between the Parties concerning Order No. 1673. To the extent Order No. 1673 conflicts with this Satisfaction, this Satisfaction shall control. SPR waives any right to challenge this Satisfaction or Order No. 1673 in any California Superior Court or any California appellate level court. This waiver applies solely to Order No. 1673 and does not waive or limit SPR's rights with respect to any future enforcement action, order, or determination unrelated to Order No. 1673.

11. Upon SPR timely complying with the terms in this Satisfaction, SPR will be deemed in full compliance with Order No. 1673 and the matter will be resolved.

12. The Parties agree that the resolution herein shall not be offered or admitted into evidence in any other matter, except as necessary to enforce the terms of this Satisfaction.

13. Persons executing this Satisfaction present and warrant that they are authorized to execute the Satisfaction on behalf of, and to bind, the entity on whose behalf that person executes the Satisfaction.

14. This Satisfaction binds SPR, and any principals, officers, receivers, trustees, successors and assignees, subsidiary and parent corporations and CalGEM and any successor agency that may have responsibility for and jurisdiction over the subject matter in this Satisfaction.

15. No agreement to modify, amend, extend, supersede, terminate, or discharge this Satisfaction, or any portion thereof, is valid or enforceable unless it is in writing and signed by all Parties to this Satisfaction.

16. Each provision of this Satisfaction is severable, and in the event that any provision of this Satisfaction is held to be illegal, invalid, or unenforceable in any jurisdiction, the remainder of this Satisfaction remains in full force and effect.

17. This Satisfaction shall be interpreted and enforced in accordance with the laws of the State of California, without regard to California's choice-of-law rules.

18. This Satisfaction may be executed and delivered in any number of counterparts, each of which when signed and delivered shall be deemed to be an original. Such counterparts shall together constitute one document. Electronic signatures shall be considered as valid signatures.

19. This Satisfaction is deemed to have been drafted equally by the Parties; it will not be interpreted for or against either Party on the grounds that one Party drafted it or a section thereof.

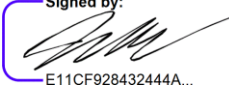
20. Effective Date. This Satisfaction shall take effect on the date of the last signature.

[Signature page follows]

Sentinel Peak Resources California LLC by the execution of its authorized representative below, attests that it has reviewed the terms set forth above, that it has had an opportunity to discuss the terms with its legal counsel, and that after such review and discussion, Sentinel Peak Resources California LLC agrees to all the terms as set forth above.

Sentinel Peak Resources California LLC

Dated: 9/1/2026

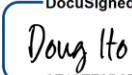
Signed by:

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Jeremy Vanderziel
 Chief Operating Officer

The Supervisor's execution below indicates the Supervisor's finding that, by agreeing to the terms above and executing where indicated, Sentinel Peak Resources California LLC has satisfied, and will satisfy, the actions required by Order No. 1673.

California Department of Conservation, Geologic Energy Management Division

Dated: 9/2/2026

DocuSigned by:

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Doug Ito
 State Oil and Gas Supervisor

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Exhibit A

(Order No. 1673)

1 Department of Conservation
2 Geologic Energy Management Division
3 Doug Ito
4 STATE OIL AND GAS SUPERVISOR
5 715 P Street, MS 19-06 (Legal Office)
6 Sacramento, California 95814
7 Telephone (916) 323-6733
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STATE OF CALIFORNIA
NATURAL RESOURCES AGENCY
DEPARTMENT OF CONSERVATION
GEOLOGIC ENERGY MANAGEMENT DIVISION

ORDER TO PAY CIVIL PENALTIES
NO. 1673

Operator: Sentinel Peak Resources California LLC (\$2641)

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 title 14 of the California Code of Regulations (**Regulations**), may impose a civil penalty on a person who violates any statutory provision of the PRC, or any regulation that implements those statutory provisions. (PRC, § 3236.5.)

Based on CalGEM's records, Sentinel Peak Resources California LLC (**Operator**) is the "operator" (as defined in PRC section 3009) of the injection wells identified on **Attachment A**, incorporated herein (**the Wells**). As described in more detail below, under applicable provisions of Regulations sections 1724.10, 1724.10.1, and 1724.10.2, to maintain uninterrupted approval for injection activity, Operator was required to complete Mechanical Integrity Testing (MIT) Part One and MIT Part Two on the Wells by specified dates and failed to timely perform one or both of the tests on each of the Wells. As a result, Operator automatically lost approval to continue injection operations. (Regulations, § 1724.10, subd. (i)(4).) Operator was therefore required to cease injection into the Wells, immediately notify CalGEM that it had not performed MIT Part One or MIT Part Two, as applicable, on the Wells, and disconnect the injection lines from the Wells, and failed to do so in violation of Regulations sections 1724.10, 1724.10.1, 1724.10.2, 1724.13, and 1777.

Therefore, pursuant to PRC sections 3013, 3106, and 3236.5, and Regulations sections 1724.6, 1724.10, 1724.10.1, 1724.10.2, 1724.13, and 1777, the Supervisor is ordering Operator to pay administrative civil penalties totaling four million two hundred thirty-three thousand six hundred dollars (\$4,233,600.00), imposed for violations of Regulations sections 1724.10, 1724.10.1, 1724.10.2, 1723.13, and 1777.

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

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II. Alleged Acts/Omissions

"Any injection well, including a well not actively injecting, that is not tested as required under Sections 1724.10.1 and 1724.10.2 shall automatically lose approval to inject, and subsequent written approval from the Division is required to reinitiate injection." (Regulations, § 1724.10, subd. (i)(4).) Accordingly, to maintain uninterrupted injection approval for injection wells, that as of April 1, 2019, were approved for injection and were also previously subject to periodic casing pressure testing requirements, MIT Part One is required to be successfully completed on each such injection well every five (5) years (except gas disposal wells); for wells not previously subject to such periodic requirements, MIT Part One was required to be successfully completed by April 1, 2024. (Regulations, §§ 1724.10, subd. (i)(4), 1724.10.1, subd. (e).) In addition, to maintain uninterrupted injection approval for injection wells, commencing April 1, 2019, MIT Part Two (fluid migration testing) is required to be successfully completed on each such injection well every two (2) years, with certain exceptions, including "[d]isposal injection wells shall be tested at least once a year" and "[t]esting is required when requested by the Division, including as may be specified in the Project Approval Letter [PAL]." (Regulations, § 1724.10.2, subd. (b).)

In performing the testing, operators must notify CalGEM at least 48 hours in advance and provide the digital copies of surveys and test results within sixty (60) days. (Regulations, § 1724.10, subd. (i)(1)-(2).) An operator must cease injection into an injection well and immediately notify CalGEM if, among other reasons, MIT Part One and/or MIT Part Two has not been timely performed or the results of such testing has not been timely provided. (Regulations, §§ 1724.6, subd. (e), 1724.10, subd. (i)(4), 1724.10.1, subd. (a), 1724.13, subd. (a)(1).) Further, operators must disconnect injection lines from the injection well if there is no current injection approval from CalGEM. (Regulations, §§ 1724.13, subd. (c), 1777, subd. (c)(4).) Each day an operator injects into an injection well without approval constitutes a separate violation. (Regulations, § 1724.13, subd. (c).)

On September 8, 2023, CalGEM sent a Notice to Operators (NTO 2023-09) as a reminder to Operator of the testing requirements set forth in Regulations sections 1724.10.1 and

1 1724.10.2, including an explanation that MIT Part One must be completed for subject wells by
2 April 1, 2024, or other date per the testing frequency stated in the applicable PAL, to maintain
3 uninterrupted approval for injection activity, and commencing April 1, 2019, subsequent
4 testing for MIT Part Two must be completed at various frequencies depending on well type, to
5 maintain uninterrupted approval for injection activity. (**Attachment C**, incorporated herein.)

6 During all times relevant to this Order, CalGEM's records indicate that the Wells were
7 each an "injection well" (as defined in Regulations section 1720.1, subdivision (f)). As specified
8 in Operator's PALs, many of the Wells were previously subject to five (5) year casing pressure
9 testing and annual fluid migration testing requirements. As indicated, on multiple instances,
10 Operator failed to timely perform MIT Part One and/or MIT Part Two.

11 After the first instance of missing a testing due date for each respective well, Operator
12 automatically lost approval for injection activity and would have continued to lack injection
13 approval unless subsequent written approval from CalGEM was provided. (Regulations, §§
14 1724.6, subd. (e), 1724.10, subd. (i)(4), 1724.10.1, subds. (a) & (e), 1724.10.2, 1724.13, subd. (b).)
15 Following the automatic loss of injection approval, Operator was required to cease injection
16 into the well, immediately notify CalGEM of its failure to timely perform the testing, and
17 disconnect the well from any injection lines, and Operator failed to do so in violation of
18 Regulations sections 1724.10, 1724.10.1, 1724.10.2, 1724.13, and 1777.

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

23 Based on Operator's self-reported injection activity, Operator continued injection into
24 the Wells without approval, combining into a total of 21,087 days of unauthorized injection
25 during the specified civil penalty date ranges. This total only includes daily unauthorized
26 injection once, on per well basis, regardless of whether a particular well may have been
27 overdue for both MIT Part One and MIT Part Two.
28

III. Civil Penalties

Based on the foregoing Alleged Acts and Omissions and pursuant to PRC section 3236.5, by this Order the Supervisor imposes on Operator administrative civil penalties totaling four million two hundred thirty-three thousand six hundred dollars (\$4,233,600.00) as follows:

Violation Description	Number of Violations	Civil Penalty Amount Per Violation	Total Civil Penalties Amount
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))	21,087	\$200.00	\$4,217,400.00
Failure to disconnect injection lines from a well without injection approval (Regulations, § 1777, subd. (c)(4))	81	\$200.00	\$16,200.00
		Grand Total:	\$4,233,600.00

For purposes of this Order, the Supervisor considered relevant circumstances when establishing the amount of the administrative civil penalty, 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, for purposes of this Order, the Supervisor is exercising his discretion to limit the civil penalties imposed by this Order. 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 other unauthorized injection violations not addressed by this Order.

IV. Operator's Required Actions

For the reasons stated herein, pursuant to the PRC sections 3013, 3106, and 3236.5, and Regulations sections 1724.6, 1724.10, 1724.10.1, 1724.10.2, 1724.13, and 1777, **IT IS HEREBY ORDERED** that Operator pay administrative civil penalties in the amount of four million two hundred thirty-three thousand six hundred dollars (\$4,233,600.00).

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

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

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

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

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

V. 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).) 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 email to 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.)

9/2/2026
DATED: _____

DocuSigned by:

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Doug Ito
State Oil and Gas Supervisor

Service List

Via Certified Mail:

Sentinel Peak Resources California LLC
c/o Michael S. James
1200 Discovery Dr., Ste. 500
Bakersfield, CA 93309

Sentinel Peak Resources California LLC
c/o Thomas Cruise
1200 Discovery Dr., Ste. 100
Bakersfield, CA 93309

Via Email:

Michael S. James
mjames@sentinelpeakresources.com

Thomas Cruise
tcruise@sentinelpeakresources.com

Attachment A

(Wells)

Operator Name: Sentinel Peak Resources California LLC**Operator Code:** S2641

API	Well Designation	District	County
0401926398	25A-WD03	Central	Fresno
0402905467	211	Central	Kern
0402944950	5-9	Central	Kern
0402956147	115-16	Central	Kern
0402960880	136-16	Central	Kern
0402972997	10-6AW	Central	Kern
0403013002	D81	Central	Kern
0403016304	A-7	Central	Kern
0403019807	E41-GD	Central	Kern
0403023112	D71-GD	Central	Kern
0403025790	SI-10H	Central	Kern
0403026168	E61-WD	Central	Kern
0403026953	E51-WD	Central	Kern
0403027669	GD-1	Central	Kern
0403028653	7951	Central	Kern
0403039998	608SWD	Central	Kern

0403052213	WD-1	Central	Kern
0403060914	WD-3	Central	Kern
0403060916	WD-7	Central	Kern
0403060919	WD-6	Central	Kern
0403060924	WD-5	Central	Kern
0403062274	WD-8	Central	Kern
0403062277	WD-11	Central	Kern
0403064480	479-10	Central	Kern
0403064481	499-10	Central	Kern
0403064915	900-9	Central	Kern
0403066886	SI-H122	Central	Kern
0403067282	901-10	Central	Kern
0403067283	902-10	Central	Kern
0403067387	GD-2R	Central	Kern
0403067396	905-9	Central	Kern
0403068997	907-9	Central	Kern
0403069728	2 I-25	Central	Kern
0403726830	1-10	Southern	Los Angeles
0403730300	6-2	Southern	Los Angeles
0407920394	14	Northern	San Luis Obispo

0407920419	135	Northern	San Luis Obispo
0407920433	142	Northern	San Luis Obispo
0407920476	4R	Northern	San Luis Obispo
0407920498	169	Northern	San Luis Obispo
0407920655	16M	Northern	San Luis Obispo
0407920657	14M	Northern	San Luis Obispo
0407920667	16I	Northern	San Luis Obispo
0407920688	20K	Northern	San Luis Obispo
0407920691	12M	Northern	San Luis Obispo
0407920782	11-5K	Northern	San Luis Obispo
0407920783	11-5L	Northern	San Luis Obispo
0407920804	15 SIN	Northern	San Luis Obispo
0407920824	18 SIM	Northern	San Luis Obispo
0407920828	17 SIN	Northern	San Luis Obispo
0407920834	16 SIP	Northern	San Luis Obispo
0407920836	15 SIK	Northern	San Luis Obispo
0407920837	13 SIN	Northern	San Luis Obispo
0407920860	11 SIL	Northern	San Luis Obispo
0407920877	17 SIL	Northern	San Luis Obispo
0407921105	4	Northern	San Luis Obispo

0407921106	14 SIH	Northern	San Luis Obispo
0407921109	17 SIH	Northern	San Luis Obispo
0407921115	9 SIM	Northern	San Luis Obispo
0407921116	11 SIN	Northern	San Luis Obispo
0407921146	9 SIN	Northern	San Luis Obispo
0407921154	6	Northern	San Luis Obispo
0407921163	11 SIP	Northern	San Luis Obispo
0407921170	10 SIG	Northern	San Luis Obispo
0407921171	12 SIH	Northern	San Luis Obispo
0407921176	15 SIG	Northern	San Luis Obispo
0407921210	16SIK	Northern	San Luis Obispo
0407921216	15SIJ	Northern	San Luis Obispo
0407921218	15SIH-2	Northern	San Luis Obispo
0407921221	9SIK	Northern	San Luis Obispo
0407921226	14NR	Northern	San Luis Obispo
0407921229	12SIK	Northern	San Luis Obispo
0407921230	12SIM	Northern	San Luis Obispo
0407921231	10SIM	Northern	San Luis Obispo
0407921234	12SIP	Northern	San Luis Obispo
0407921272	10-5K R	Northern	San Luis Obispo

0407921286	9L R	Northern	San Luis Obispo
0408301920	20	Northern	Santa Barbara
0408320501	86	Northern	Santa Barbara
0408321866	A83-19	Northern	Santa Barbara
0408322150	A31-19	Northern	Santa Barbara

Attachment B

(Definitions and Authorities)

Definitions

PRC section 3008, subdivision (a), defines "well" to mean, among other things, "any well drilled for the purpose of injecting fluids or gas for stimulating oil or gas recovery, repressuring or pressure maintenance of oil or gas reservoirs, or disposing of waste fluids from an oil or gas field...."

PRC section 3009, defines "operator" to mean "a person who, by virtue of ownership, or under the authority of a lease or any other agreement, has the right to drill, operate, maintain, or control a well or production facility."

PRC section 3010 defines "production facility" to mean "any equipment attendant to oil and gas production or injection operations including, but not limited to, tanks, flowlines, headers, gathering lines, wellheads, heater treaters, pumps, valves, compressors, injection equipment, and pipelines that are not under the jurisdiction of the State Fire Marshal pursuant to Section 51010 of the Government Code." (See also Regulations, § 1760, subd. (r).)

Regulations section 1720, subdivision (f), defines "operations" to mean "any one or all of the activities of an operator covered by Division 3 of the Public Resources Code."

Regulations section 1720.1, subdivision (f), defines an "injection well" to mean "a well into which fluids are being injected as part of an underground injection project, or that is approved by the Division for such purpose."

State Oil and Gas Supervisor Authority

PRC section 3013 states that the oil and gas conservation laws (Division 3 of the PRC, commencing with § 3000) "shall be liberally construed to meet its purposes" and grants the Supervisor "all powers" that may be necessary to carry out those purposes.

PRC section 3106, subdivision (a), mandates that the Supervisor "supervise the drilling, operation, maintenance, and abandonment of wells and the operation, maintenance, and

1 removal or abandonment of tanks and facilities attendant to oil and gas production ... so as
2 to prevent, as far as possible, damage to life, health, property, and natural resources[.]”

3 **PRC section 3236.5** authorizes the Supervisor to impose a civil penalty on a person who
4 violates any statutory provision in Chapter 1 of Division 3 of the PRC (PRC sections 3000 through
5 3473), or any regulation that implements those statutory provisions.

6 **Regulations section 1724.6, subdivision (e)**, states that “[u]nderground injection projects
7 or injection operations suspended upon written notice from the Division or for any of the
8 reasons specified under Section 1724.13 shall not resume without subsequent written approval
9 from the Division.”

10 **Regulations section 1724.10, subsection (i)**, states that “[m]echanical integrity testing
11 must be performed on all injection wells to ensure the injected fluid is confined to the
12 approved injection zone. Mechanical integrity testing shall consist of a two-part demonstration
13 in accordance with Sections 1724.10.1 and 1724.10.2.”

14 **Regulations section 1724.10, subsection (i)(1)**, requires that the “operator shall notify the
15 appropriate Division district office at least 48 hours before performing any testing under
16 Sections 1724.10.1 and 1724.10.2 so that Division staff may witness the operations, unless the
17 Division approves shorter notice. This notification requirement also applies to subsequent
18 schedule changes the operator may make for a previously noticed test.”

19 **Regulations section 1724.10, subsection (i)(2)**, requires that “[d]igital copies of surveys
20 and test results shall be submitted to the Division within 60 days of the tests.”

21 **Regulations section 1724.10, subsection (i)(4)**, states that “[a]ny injection well, including
22 a well not actively injecting, that is not tested as required under Sections 1724.10.1 and
23 1724.10.2 shall automatically lose approval to inject, and subsequent written approval from
24 the Division is required to reinitiate injection. “

25 **Regulations section 1724.10.1, subdivision (a)**, requires that “[p]rior to commencing
26 injection operations for the first time after a well is approved or reapproved by the Division for
27 injection, each injection well shall pass a pressure test of the casing to determine the absence
28 of leaks. Thereafter, the casing of each well shall be tested at least once every five years, prior

to recommencing injection operations following the repositioning or replacement of downhole equipment, or whenever requested by the Division. If an injection well is a gas disposal well, then the casing of the well shall be tested at least once every year. If a required pressure test is not successfully completed, then the operator shall immediately notify the Division and the well shall not be used for injection without subsequent written approval from the Division."

Regulations section 1724.10.1, subdivision (e), states that "for injection wells that as of April 1, 2019, were approved for injection but were not previously subject to periodic casing pressure testing requirements, testing under this section is not required to be completed until April 1, 2024...."

Regulations section 1724.10.2, subdivision (a), states "[i]n addition to testing under Section 1724.10.1, operators shall periodically test injection wells to demonstrate that there is no fluid migration behind the casing, tubing, or packer. This testing may be accomplished by any of the methods set forth in subdivisions (d) through (f), or other method approved by the Division (including modifications of the methods below when approved by the Division in writing). Operators shall obtain written approval from the Division regarding the testing method prior to performing the tests."

Regulations section 1724.10.2, subdivision (b), states that "[t]esting under this section is required within three months after injection has commenced for the first time after a well is approved or reapproved by the Division for injection. Commencing April 1, 2019, subsequent testing under this section is required at least once every two years, with the following exceptions:

(1) Disposal injection wells shall be tested at least once a year;

(2) Low-use cyclic steam injection wells are required to be tested at least once every five years;

(3) If a well that previously met the definition of a low-use cyclic steam injection well has not been tested in over one year, then testing is required within one year of the time that the well stopped being a low-use cyclic steam injection well.

(4) Steamflood injection wells equipped with tubing and packer are required to be tested at least once every five years;

(5) Testing is required following an unplanned variance in injection pressure of more than 25 percent within a 48-hour period, unless the operator demonstrates to the Division that the variance was the result of an issue that does not relate to well integrity; and

(6) Testing is required when requested by the Division, including as may be specified in the Project Approval Letter."

Regulations section 1724.13, subsection (a)(1), states that "[t]he operator shall cease injection into the affected injection well and immediately notify CalGEM if any of the following occur: (1) The operator has not performed mechanical integrity testing on the well as required by Regulations section 1724.10(i) or the notification and results required under Section 1724.10(i) have not been provided to the Division...."

Regulations section 1724.13, subsection (b), states that "[t]he operator shall comply with all operational and remedial directives of the Division related to the reason for ceasing injection, and shall not resume injection into the well without subsequent written approval from the Division."

Regulations section 1724.13, subsection (c), states that "[e]ach day that injection occurs into an injection well in violation of this section shall be considered a separate violation. As required under Section 1777(c)(4), the operator shall disconnect injection lines from the injection well if there is no current approval from the Division for injection into the well."

Regulations section 1777, subsection (c)(4), states that "[i]njection lines shall be disconnected from injection wells unless there is current approval from the Division for injection of fluid."

Attachment C
(Notice to Operators 2023-09)

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**NOTICE TO OPERATORS
NTO 2023-09**

September 8, 2023

**REMINDER OF APRIL 1, 2024 MECHANICAL INTEGRITY TESTING COMPLIANCE DEADLINE
FOR CERTAIN CATEGORIES OF INJECTION WELLS**

This notice is a courtesy reminder to operators that April 1, 2024 marks an important regulatory deadline for certain categories of injection wells to demonstrate compliance with the “part 1” and “part 2” components of mechanical integrity testing (MIT) necessary to maintain uninterrupted approval for injection activity under California’s Underground Injection Control Program. Operators are required to conduct mechanical integrity testing in accordance with the law by April 1, 2024, and submit tests results to CalGEM, as outlined below.

April 1, 2024 MIT Deadlines for Certain Categories of Injection Wells

“Part 1” MIT Requirements

The regulatory provisions governing the frequency and procedures for “part 1” mechanical integrity testing of injection wells appear in California Code of Regulations, title 14, section 1724.10.1. These rules require operators to complete a “part 1” testing demonstration every five years for most injection wells in order to maintain uninterrupted approval for injection activity. The regulatory requirements for “part 1” testing was amended in 2019, and those changes include extending the requirement for routine “part 1” testing to some types of wells that were not previously subject to “part 1” testing,¹ including steamflood and cyclic steam injection wells without tubing and packer approved for operation before April 1, 2019.

For these types of wells, the 2019 update to the regulations allowed for five years—effectively a full testing cycle—for operators to continue injection operations while making arrangements to complete “part 1” testing. That five-year period ends on April 1, 2024.²

¹ Links to published sources of important statutes and regulations administered by CalGEM, including the underground injection control regulations, are available via the Department of Conservation website [here](#). Copies of many important materials associated with the 2019 Updated Underground Injection Control Regulations rulemaking action also are available on the Department of Conservation website [here](#).

² See California Code of Regulations, title 14, section 1724.10.1, subdivision (e).

Operators with well types that became subject to “part 1” testing requirements as part of the 2019 update to regulations must perform testing by April 1, 2024.

“Part 2” MIT Requirements

The regulatory provisions governing the frequency and procedures for “part 2” mechanical integrity testing of injection wells appear in California Code of Regulations, title 14, section 1724.10.2. These rules, also amended in 2019, require a “part 2” testing demonstration to be completed at various frequencies to maintain uninterrupted approval for injection activity, depending on the type of the well. For two categories of wells, the default “part 2” testing frequency is once every five years: low-use cyclic steam injection wells³ and steamflood injection wells equipped with tubing and packer. Consequently, for wells in these two categories, unless the “part 2” test requirement has been satisfied with testing completed at some time after April 1, 2019, the deadline to demonstrate “part 2” testing compliance is April 1, 2024.⁴

Operators with wells that fall into these two categories must perform “part 2” testing by April 1, 2024.

Submission of MIT Results to CalGEM

CalGEM encourages operators to submit MIT results to CalGEM substantially in advance of the April 1, 2024 deadline, as early submittal can help provide sufficient time in advance of the deadline to address any concerns that may arise, minimizing potential interruptions in injection approval. However, all required tests must be performed by April 1, 2024 and the results submitted to CalGEM within 60 days from the test date.⁵

CalGEM strongly urges all operators to submit MIT results using the Upload Test Results form in WellSTAR. Using the Upload Test Results form ensures submitted MIT results are logged and tracked correctly within CalGEM's records. MIT results submitted in any other way, including as documents associated with the Well Summary form in WellSTAR, will not interface with the WellSTAR systems for tracking MIT compliance status. MIT results submitted outside of the Upload Test Results form thus risk going unnoticed, leading to avoidable and potentially costly confusion for both CalGEM and operators.

Relatedly, CalGEM also strongly urges all operators to review as soon as possible prior MIT result submissions made during the past several years to confirm that the MIT results were submitted using the Upload Test Results form. Because MIT results not submitted using the Upload Test Results form in WellSTAR do not interface with WellSTAR systems for tracking MIT compliance status, CalGEM recommends resubmitting those MIT results as soon as possible using the Upload Test Results form. CalGEM recognizes that reviewing

³ “Low-use cyclic steam injection well” is a special category of well defined by certain criteria specified in California Code of Regulations, title 14, section 1720.1, subdivision (i).

⁴ See California Code of Regulations, title 14, section 1724.10.2, subdivisions (b)(2) and (b)(6).

⁵ See California Code of Regulations, title 14, section 1724.10, subdivision (i)(2).

and potentially resubmitting these MIT results may involve a measure of administrative inconvenience for operators. Overall, however, the additional administrative effort spent reviewing and resubmitting recent MIT results in this way likely will yield a net savings of time and inconvenience both for operators and CalGEM because it will ensure the MIT results interface with the WellSTAR systems that CalGEM and operators use for tracking regulatory compliance.

For guidance on the procedures to submit MIT results, please consult the WellSTAR User Reference Guide: Uploading MIT Test Procedure:

https://www.conservation.ca.gov/calgem/for_operators/Documents/Uploading%20MIT%20Test%20Procedure_8%2031%2023_final.pdf

This guide and other relevant WellSTAR information and training materials are available on CalGEM's website: CalGEM WellSTAR Training Materials:

https://www.conservation.ca.gov/calgem/for_operators/Pages/wellstar-training-materials.aspx

Cessation of Injection in Lieu of MIT

In lieu of providing test results demonstrating satisfaction of the "part 1" or "part 2" mechanical integrity testing requirements, an operator may elect to cease injection into the well and notify CalGEM of its intention not to complete mechanical integrity testing on the routine regulatory schedule.⁶ Approval for injection into the well will be effectively suspended by action of the regulations once the well becomes overdue for MIT and, consequently, the operator will need to obtain written approval from CalGEM before the well may be used for injection activity again.⁷ Obtaining CalGEM's approval to resume injection into the well will require, at a minimum, ensuring the well is compliant with "part 1" and "part 2" testing requirements.

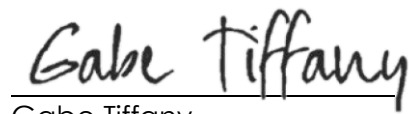
⁶ See California Code of Regulations, title 14, section 1724.13.

⁷ See California Code of Regulations, title 14, sections 1724.6, subdivision (e), 1724.10, subdivision (i)(4), and 1724.13.

Injection into a Well Overdue for MIT is a Violation of Law

Routine, periodic demonstrations of "part 1" and "part 2" mechanical integrity are important elements of the underground injection control regulatory framework. Failure to comply with regulatory requirements, including by continuing injection into a well that is overdue for "part 1" or "part 2" testing, is a violation of law. CalGEM may address regulatory violations by imposing civil penalties and taking other enforcement actions.⁸

If you have any questions or concerns regarding compliance with the regulatory requirements addressed in this notice, please contact the CalGEM UIC Program at uic.implementation@conservation.ca.gov.

A handwritten signature in black ink that reads "Gabe Tiffany". The signature is written in a cursive, slightly slanted style. Below the signature is a horizontal line.

Gabe Tiffany
Acting State Oil and Gas Supervisor

⁸ See Public Resources Code section 3236.5.

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Attachment D
(April 5, 2024, Notification Regarding MIT Compliance)

From: UIC.Implementation@DOC

Cc: [Ito, Douglas@DOC](mailto:Ito.Douglas@DOC); [Smith, Courtney@DOC](mailto:Smith.Courtney@DOC); [Sharma, Rohit@DOC](mailto:Sharma.Rohit@DOC); [Yura, Elizabeth@DOC](mailto:Yura.Elizabeth@DOC); [Reader, Emily@DOC](mailto:Reader.Emily@DOC); [Jones, Chris@DOC](mailto:Jones.Chris@DOC); [Powell, Trey@DOC](mailto:Powell.Trey@DOC); [Beskas, Pete@DOC](mailto:Beskas.Pete@DOC); [Koch, Allan@DOC](mailto:Koch.Allan@DOC); [Nadimi, Siavash@DOC](mailto:Nadimi.Siavash@DOC)

Bcc: RyanJones@chevron.com; [DOGGR Agent **Shared**](#); [AeraCalGEMAgent](#); [Young JA \(Jeff\) at Aera](#); [Ryan Nelson](#); [Dshepherd@sentinelpeakresources.com](#); [ogr@crc.com](#); [Faisal.Latif@crc.com](#); [snixon@crimsonrm.com](#); [ebdoggragent@ebresources.com](#); [SGrodewald@holmeswestern.com](#); [hameri@naftex.com](#); [ben@grade6oil.com](#); [charlie@trcopco.com](#); [rnelson@bry.com](#); [Ruben.villa@crudecorp.com](#); [jnahama@vaqueroenergy.com](#); [philip.brown@pceclp.com](#); [ericalex@shadowwolfenergy.com](#); [msanders@catcanyonresources.com](#); [jnahama@vaqueroenergy.com](#); [CalGemAgent@calnrg.com](#); [chuge@hathawayllc.com](#); [jmeadors@valleywatermanagement.org](#); [abarbey@carbonenergycorp.com](#); [philip.brown@pceclp.com](#); [clud@petro-lud.com](#); [wkelleher@westenergycapital.com](#); [jsantiago@sifmtrcor.com](#); [brett.black@jpoil.com](#); [cathy@cmoilinvestments.com](#); [sfaulkenburg@envirotechteam.com](#); [shpdoggr@shpi.net](#); [hcaywood@westamericanservice.com](#); [sfc@prllca.com](#); [droach@pacediversified.com](#); [Myers, Brandon M](#); [jgabel@archer-longbow.com](#); [jeff@maranathapetroleum.com](#); [sbowman@l-binc.com](#); [Billb@termoco.com](#); [STIM@calcoastacidizing.com](#); [mike@legacyoilfieldservices.com](#); [jerryapcr@gmail.com](#); [cbgofrogs@att.net](#); [oil.gas@qte.net](#); [jeffb@sir.com](#); [jmoran429@gmail.com](#); [dkelly@kelpetro.net](#); [brett.cooper3345@gmail.com](#); [dshay@hellmanprop.com](#); [herleyoffices@herley-kelleyco.com](#); [vast.star.corp7@gmail.com](#); [rowlee@trioilpetroleum.com](#); [graylease@gmail.com](#); [steve-mcgowan@mimi-services.com](#); [harris@numericssolutions.com](#); [tom.harter4@gmail.com](#); [rnelson@bry.com](#); [steve@renpetllc.com](#); [dbradley@dcorllc.com](#); [zack@towneexploration.com](#); [mark@chemassist.net](#); [spalmer@kingsoiltools.com](#); [ba925jeff@yahoo.com](#); [ckrummrich@kecorp.us](#)

Subject: Notification Regarding April 1 Mechanical Integrity Testing Compliance Deadline

Date: Friday, April 5, 2024 3:20:40 PM

Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[MIT1 Overdue List ForOperators.xlsx](#)

To Whom It May Concern,

According to the WellSTAR database, operators receiving this courtesy notice have been identified, as of March 31, to (1) have one or more injection well(s) with an active status and (2) have failed to notify CalGEM of cessation of injection or record of a passing "Part One" mechanical integrity test (MIT). As of April 1, 2024, if "Part One" MIT has not been done on an injection well as required, then approval for injection activity has been automatically suspended pursuant to California Code of Regulations, title 14 (CCR), section 1724.10, subdivision (i)(4). A Notice to Operators (NTO) 2023-09, *Reminder of April 1, 2024 Mechanical Integrity Testing Compliance Deadline for Certain Categories of Injection Wells* ([link](#)), was issued September 8, 2023. This NTO provides a summary of the April 1, 2024 regulatory requirements and expectations of operators to ensure accurate record of compliance.

For efficiency, CalGEM is providing the attached preliminary dataset to afford operators the opportunity to notify CalGEM of the current status of "Part One" MIT and/or well injection status for their well(s). As noted in the NTO, in lieu of providing test results demonstrating satisfaction of the "Part One" MIT requirements, an operator may elect to cease injection into the well and notify CalGEM of its intention not to complete MIT on the routine regulatory schedule. CalGEM will consider response to this notice as fulfillment of the regulatory notification requirement in accordance with CCR section 1724.13, subdivision (a).

As advised in the NTO, CalGEM strongly urges all operators to submit MIT results using the Upload Test Results form in WellSTAR. Using the Upload Test Results form ensures submitted MIT results are logged and tracked correctly within CalGEM's

records. MIT results submitted in any other way, including as documents associated with the Well Summary form in WellSTAR, will not interface with the WellSTAR systems for tracking MIT compliance status. MIT results submitted outside of the Upload Test Results form thus risk going unnoticed, leading to avoidable and potentially costly confusion for both CalGEM and operators.

CalGEM recognizes operators have 60 days to submit test results from the test date and some of the wells listed in the attached dataset may have passing tests as of April 1, 2024, and records have not yet been received by CalGEM. Through response of this email, affirmative confirmation of wells that fall within this scenario will help CalGEM to reduce the list of perceived non-compliant wells.

Failure to comply with regulatory requirements, including by continuing injection into a well that is overdue for "Part One" MIT would be a serious violation of CalGEM's Underground Injection Control regulations. CalGEM will be addressing any such violations by imposing civil penalties and taking other enforcement actions as necessary. Responding to this notification as soon as possible and providing an up-to-date portrayal of your injection well(s) will clarify the compliance status of the listed wells, benefiting both you and CalGEM.

If there are questions regarding testing or compliance of particular wells, contact the district the well is located in. For responses to this notification, respond to CalGEM UIC Program at uic.implementation@conservation.ca.gov with a Subject title "April 1 Mechanical integrity Testing Compliance Deadline_[operator name]".

Sincerely,



Siavash Nadimi, Ph.D.

Senior Oil & Gas Engineer (Supervisor)
UIC HQ Program | CalGEM

California Department of Conservation

715 P Street, Sacramento, CA 95814

Cel: (916) 917-3793

Email: Siavash.Nadimi@conservation.ca.gov



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Exhibit B

(Compliance Wells List)

API10	WellName	WellType	MIT Type	TestDueDate
0402944950	15A 5-9	DISPOSAL - Gas	MIT1	10/15/2026
0402944950	15A 5-9	DISPOSAL - Gas	MIT2	10/16/2026
0403013002	15A D81	DISPOSAL - Gas	MIT1	11/26/2026
0403013002	15A D81	DISPOSAL - Gas	MIT2	12/16/2026
0403064735	19Z 133D	CYCLIC	MIT2	11/12/2026
0403005736	WILLIAMS 9	CYCLIC	MIT2	11/27/2026
0403049163	19Z 146D	CYCLIC	MIT2	10/1/2026
0403047298	19Z 147D	CYCLIC	MIT2	9/20/2026
0403068925	19Z 1-WD	DISPOSAL - Water	MIT2	11/11/2026
0403066202	19Z 2-WD	DISPOSAL - Water	MIT2	11/11/2026
0403067316	19Z 3-WD	DISPOSAL - Water	MIT2	11/12/2026
0403049148	19Z 40D	CYCLIC	MIT2	11/1/2026
0403064732	19Z 42RD	CYCLIC	MIT2	11/15/2026
0403056397	19Z 43D	CYCLIC	MIT2	12/4/2026
0403056396	19Z 45D	CYCLIC	MIT2	12/19/2026
0403049151	19Z 47D	CYCLIC	MIT2	10/24/2026
0403068924	19Z 4-WD	DISPOSAL - Water	MIT2	11/13/2026
0403049155	19Z 50D	CYCLIC	MIT2	9/4/2026
0403047295	19Z 51D	CYCLIC	MIT2	10/25/2026
0403049156	19Z 53D	CYCLIC	MIT2	11/4/2026
0403047297	19Z 54D	CYCLIC	MIT2	10/22/2026
0403049158	19Z 56D	CYCLIC	MIT2	10/25/2026
0403067317	19Z 5-WD	DISPOSAL - Water	MIT2	11/14/2026
0403052768	19Z 62D	CYCLIC	MIT2	10/22/2026
0403049161	19Z 66D	CYCLIC	MIT2	10/24/2026
0403055678	19Z 67D	CYCLIC	MIT2	9/20/2026
0403055677	19Z 68D	CYCLIC	MIT2	11/15/2026
0403037823	19Z 72	DISPOSAL - Gas	MIT1	9/8/2026
0403037823	19Z 72	DISPOSAL - Gas	MIT2	9/9/2026
0403050362	19Z 73	DISPOSAL - Gas	MIT1	9/10/2026
0403050362	19Z 73	DISPOSAL - Gas	MIT2	9/11/2026
0403056395	19Z 76D	CYCLIC	MIT2	11/3/2026
0403056394	19Z 77D	CYCLIC	MIT2	10/21/2026
0403726925	BALDWIN 1-11	INJECTOR-WF	MIT2	9/10/2026
0403726925	BALDWIN 1-11	INJECTOR-WF	MIT1	10/6/2026
0403725136	BALDWIN 223	INJECTOR-WF	MIT2	9/12/2026
0403730300	BALDWIN 6-2	INJECTOR-WF	MIT2	9/10/2026
0403730220	BALDWIN 6-7	INJECTOR-WF	MIT2	9/12/2026
0403723389	BC 302	INJECTOR-WF	MIT2	9/30/2026
0403730120	BC 6642	INJECTOR-WF	MIT2	10/1/2026
0403725354	BC STOCKER LAI COM 1	INJECTOR-WF	MIT2	11/17/2026
0402956147	BREMER 115	DISPOSAL - Gas	MIT1	12/2/2026
0402956147	BREMER 115	DISPOSAL - Gas	MIT2	12/15/2026

0402960880	BREMER 136	DISPOSAL - Gas	MIT1	10/15/2026
0402960880	BREMER 136	DISPOSAL - Gas	MIT2	10/16/2026
0403053360	BREMER DSI-35	INJECTOR-SF	MIT2	9/6/2026
0403033012	BREMER MSI-18	INJECTOR-SF	MIT2	12/20/2026
0403026710	BREMER MSI-33	INJECTOR-SF	MIT2	12/27/2026
0403051011	BREMER MSI-7	INJECTOR-SF	MIT2	12/20/2026
0403040384	WILLIAMS 23	CYCLIC	MIT2	9/17/2026
0403040383	WILLIAMS 22	CYCLIC	MIT2	10/24/2026
0403006909	WILLIAMS 10	CYCLIC	MIT2	11/25/2026
0403069156	WELPORT I-53	INJECTOR-SF	MIT1	11/1/2026
0402941083	DOME 12	DISPOSAL - Gas	MIT1	12/2/2026
0402941083	DOME 12	DISPOSAL - Gas	MIT2	12/15/2026
0403069155	WELPORT I-52	INJECTOR-SF	MIT1	10/22/2026
0403069239	WELPORT I-50	INJECTOR-SF	MIT1	10/31/2026
0403069361	WELPORT I-48	INJECTOR-SF	MIT1	11/18/2026
0403069346	WELPORT I-46	INJECTOR-SF	MIT1	11/18/2026
0403067104	GAMBLE_1 E10-1	CYCLIC	MIT1	9/27/2026
0403067102	GAMBLE_1 E11-1	CYCLIC	MIT1	9/27/2026
0403067081	GAMBLE_1 H16-1	CYCLIC	MIT2	9/6/2026
0403725253	VRU LAI_1 218	INJECTOR-WF	MIT2	10/27/2026
0403726702	VRU 804	INJECTOR-WF	MIT2	10/8/2026
0403069318	GAMBLE_1 I-24R	INJECTOR-SF	MIT1	12/14/2026
0403069312	GAMBLE_1 I-32	INJECTOR-SF	MIT1	12/30/2026
0403069327	GAMBLE_1 I-6R	INJECTOR-SF	MIT1	12/17/2026
0403069315	GAMBLE_1 I-7R	INJECTOR-SF	MIT1	12/28/2026
0403016385	GAMBLE_1 I-8	INJECTOR-SF	MIT2	10/8/2026
0402935203	HONDO PEERLESS 57	DISPOSAL - Gas	MIT1	11/26/2026
0402935203	HONDO PEERLESS 57	DISPOSAL - Gas	MIT2	12/16/2026
0403730214	VRU 4332	INJECTOR-WF	MIT1	11/7/2026
0403726728	VRU 294	INJECTOR-WF	MIT1	11/28/2026
0403725006	VRU 272	INJECTOR-WF	MIT2	12/3/2026
0403723486	VRU 264	INJECTOR-WF	MIT2	11/13/2026
0403709088	VRU 118	INJECTOR-WF	MIT2	12/3/2026
0403709083	VRU 114	INJECTOR-WF	MIT2	12/4/2026
0403027884	HOPKINS 247A-10	INJECTOR-SF	MIT2	9/19/2026
0403038385	HOPKINS 275-10	INJECTOR-SF	MIT2	9/23/2026
0403727079	VICKERS_1 VRU LAI_1 900	INJECTOR-WF	MIT2	10/28/2026
0403708772	VICKERS_1 LAI_1 1	INJECTOR-WF	MIT1	9/11/2026
0403708710	VICKERS_1 84	INJECTOR-WF	MIT2	12/2/2026
0403726608	VICKERS_1 400	INJECTOR-WF	MIT2	10/29/2026
0403726607	VICKERS_1 300	INJECTOR-WF	MIT2	10/23/2026
0403066843	HOYT SI-H117	INJECTOR-SF	MIT1	12/20/2026
0403708736	VICKERS_1 115	INJECTOR-WF	MIT1	11/28/2026
0407920667	HYLA 16I	DISPOSAL - Gas	MIT1	10/22/2026

0407920667	HYLA 16I	DISPOSAL - Gas	MIT2	10/27/2026
0407920655	HYLA 16M	DISPOSAL - Water	MIT2	11/5/2026
0407920476	HYLA 4R	DISPOSAL - Gas	MIT1	10/22/2026
0407920476	HYLA 4R	DISPOSAL - Gas	MIT2	10/28/2026
0403003285	KEENE 21	CYCLIC	MIT2	9/12/2026
0403029642	KEENE 57	CYCLIC	MIT2	12/6/2026
0403029627	KEENE 60	CYCLIC	MIT2	9/22/2026
0403720042	TVIC 64	INJECTOR-WF	MIT2	12/3/2026
0403029645	KEENE 64	CYCLIC	MIT1	12/6/2026
0403709095	TVIC 3A	INJECTOR-WF	MIT1	10/10/2026
0403045136	KEENE 82	CYCLIC	MIT2	11/4/2026
0403063037	KEENE 91	CYCLIC	MIT2	10/18/2026
0403043633	KELLY 21	CYCLIC	MIT2	10/18/2026
0403009967	KELLY 9	CYCLIC	MIT2	10/28/2026
0403708192	LAI_1 226	INJECTOR-WF	MIT2	10/1/2026
0403707825	LAI_1 267	INJECTOR-WF	MIT2	12/1/2026
0403700527	LAI_1 279	INJECTOR-WF	MIT2	12/4/2026
0403722983	LAI_1 358	INJECTOR-WF	MIT2	11/14/2026
0403723365	LAI_1 362	INJECTOR-WF	MIT2	11/14/2026
0403725076	LAI_1 376	INJECTOR-WF	MIT2	10/2/2026
0403725255	LAI_1 383	INJECTOR-WF	MIT2	10/2/2026
0403726402	LAI_1 411	INJECTOR-WF	MIT2	11/17/2026
0403726483	LAI_1 417	INJECTOR-WF	MIT2	11/13/2026
0403726499	LAI_1 425	INJECTOR-WF	MIT2	10/3/2026
0403726590	LAI_1 435	INJECTOR-WF	MIT2	10/22/2026
0403726657	LAI_1 446	INJECTOR-WF	MIT2	12/2/2026
0403726740	LAI_1 454	INJECTOR-WF	MIT2	10/28/2026
0403727231	LAI_1 5654	INJECTOR-WF	MIT2	11/14/2026
0403708240	LAI_1 83A	INJECTOR-WF	MIT2	11/18/2026
0403707876	MACHADO 5	INJECTOR-WF	MIT2	10/7/2026
0403709095	TVIC 3A	INJECTOR-WF	MIT2	10/7/2026
0403063911	TUMBADOR 93	INJECTOR-SF	MIT1	12/29/2026
0402941516	TUMBADOR 11	DISPOSAL - Gas	MIT2	11/5/2026
0403006488	MCKITTRICK FEE 401	CYCLIC	MIT2	9/3/2026
0403008536	MCKITTRICK FEE 402	CYCLIC	MIT2	9/5/2026
0403033297	MCKITTRICK FEE 404	CYCLIC	MIT2	9/3/2026
0403033303	MCKITTRICK FEE 410	CYCLIC	MIT2	9/4/2026
0402941516	TUMBADOR 11	DISPOSAL - Gas	MIT1	10/29/2026
0403004557	MCKITTRICK FEE I-4	INJECTOR-SF	MIT2	12/18/2026
0403726939	TEMPLE 7-4	INJECTOR-WF	MIT2	12/5/2026
0403039998	MCKITTRICK FRONT 608 SWD	DISPOSAL - Water	MIT2	12/1/2026
0403726935	TEMPLE 6-3	INJECTOR-WF	MIT2	11/19/2026
0403064242	MCKITTRICK FRONT A22-1	CYCLIC	MIT1	10/5/2026
0403726934	TEMPLE 6-1	INJECTOR-WF	MIT2	12/8/2026

0403723468	TEMPLE 26	INJECTOR-WF	MIT2	9/15/2026
0403062274	SUNSET WD-8	DISPOSAL - Water	MIT2	11/25/2026
0403062274	SUNSET WD-8	DISPOSAL - Water	MIT1	11/12/2026
0403060916	SUNSET WD-7	DISPOSAL - Water	MIT2	10/8/2026
0403060924	SUNSET WD-5	DISPOSAL - Water	MIT2	11/18/2026
0403069233	MCKITTRICK UNIT_1 I-1R	INJECTOR-SF	MIT1	12/1/2026
0403064321	MCKITTRICK UNIT_1 I-20	INJECTOR-SF	MIT1	11/22/2026
0403064323	MCKITTRICK UNIT_1 I-21	INJECTOR-SF	MIT1	11/12/2026
0403064322	MCKITTRICK UNIT_1 I-22	INJECTOR-SF	MIT1	11/16/2026
0403064163	MCKITTRICK UNIT_1 I-23	INJECTOR-SF	MIT1	12/7/2026
0403064164	MCKITTRICK UNIT_1 I-24	INJECTOR-SF	MIT1	12/8/2026
0403064165	MCKITTRICK UNIT_1 I-25	INJECTOR-SF	MIT1	12/22/2026
0403069234	MCKITTRICK UNIT_1 I-2R	INJECTOR-SF	MIT1	12/8/2026
0403069232	MCKITTRICK UNIT_1 I-32	INJECTOR-SF	MIT1	10/27/2026
0403069247	MCKITTRICK UNIT_1 I-33	INJECTOR-SF	MIT1	12/8/2026
0403069244	MCKITTRICK UNIT_1 I-34	INJECTOR-SF	MIT1	10/24/2026
0403069245	MCKITTRICK UNIT_1 I-35	INJECTOR-SF	MIT1	11/2/2026
0403069246	MCKITTRICK UNIT_1 I-36	INJECTOR-SF	MIT1	10/25/2026
0403069307	MCKITTRICK UNIT_1 I-37	INJECTOR-SF	MIT1	11/22/2026
0403069248	MCKITTRICK UNIT_1 I-38	INJECTOR-SF	MIT1	11/24/2026
0403069243	MCKITTRICK UNIT_1 I-39	INJECTOR-SF	MIT1	10/31/2026
0403069252	MCKITTRICK UNIT_1 I-3R	INJECTOR-SF	MIT1	10/19/2026
0403069254	MCKITTRICK UNIT_1 I-41	INJECTOR-SF	MIT1	10/13/2026
0403069253	MCKITTRICK UNIT_1 I-42	INJECTOR-SF	MIT1	10/3/2026
0403069255	MCKITTRICK UNIT_1 I-4R	INJECTOR-SF	MIT1	10/9/2026
0403069309	MCKITTRICK UNIT_1 I-5R	INJECTOR-SF	MIT1	12/3/2026
0403060914	SUNSET WD-3	DISPOSAL - Water	MIT2	11/25/2026
0403062278	SUNSET WD-12	DISPOSAL - Water	MIT2	12/30/2026
0403016304	SUNSET A-7	DISPOSAL - Water	MIT2	10/8/2026
0403054230	SUNSET 252TO-1	INJECTOR-SF	MIT1	10/26/2026
0403708324	STOCKER 17	INJECTOR-WF	MIT2	10/6/2026
0403063657	STAR FEE D27-1	CYCLIC	MIT2	9/3/2026
0403053625	STAR FEE 8440	CYCLIC	MIT2	9/6/2026
0403033757	REARDON 324K	CYCLIC	MIT2	10/30/2026
0403033634	REARDON 330K	CYCLIC	MIT2	10/30/2026
0403051312	REARDON 334I	CYCLIC	MIT2	11/1/2026
0403033662	REARDON 334K	CYCLIC	MIT2	11/1/2026
0407920657	ROCK 14M	DISPOSAL - Gas	MIT1	10/22/2026
0407920657	ROCK 14M	DISPOSAL - Gas	MIT2	10/29/2026
0403052444	SECURITY 383	CYCLIC	MIT2	10/24/2026
0407920433	SIGNAL 142	DISPOSAL - Water	MIT2	11/5/2026
0403015615	SOUTH CERRITOS 19	CYCLIC	MIT2	10/31/2026
0403022392	SOUTH CERRITOS 22	CYCLIC	MIT1	11/23/2026
0403029632	SOUTH CERRITOS 26	CYCLIC	MIT2	10/16/2026