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7 **STATE OF CALIFORNIA**
8 **NATURAL RESOURCES AGENCY**
9 **DEPARTMENT OF CONSERVATION**
10 **DIVISION OF OIL, GAS, AND GEOTHERMAL RESOURCES**
11
12 **ORDER TO REMEDIATE WELLS AND**
13 **PRODUCTION FACILITIES**
14 **TO PREVENT DAMAGE TO LIFE, HEALTH,**
15 **PROPERTY, AND NATURAL RESOURCES**

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18
19 **ORDER NO. 1112**

20 **Dated: April 11, 2016**

21 **Operator: Rincon Island Limited Partnership**

22 **BY**

23 **Kenneth A. Harris Jr.**

24 **STATE OIL AND GAS SUPERVISOR**

25 **1**

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27 **ORDER TO REMEDIATE WELLS AND PRODUCTIONS FACILITIES TO PREVENT DAMAGE TO LIFE,**
28 **HEALTH, PROPERTY, AND NATURAL RESOURCES**

1 **I. Introduction**

2
3 Pursuant to Public Resources Code section 3224, the State's Oil and Gas
4 Supervisor (Supervisor) may order tests to prevent damage to life, health, property and
5 natural resources.

6 **Rincon Island Limited Partnership (RILP)** (hereinafter, "Operator") is the
7 "operator" (as defined in Public Resources Code section 3009) of various oil and/or gas
8 wells and "production facilities" (as defined by Public Resources Code section 3010)
9 located on Rincon Island, situated in Ventura County, California. Rincon Island is under
10 the custody and control of RILP as part of its lease of state lands from the California
11 State Lands Commission, by way of lease PRC 1466. Based on the credible evidence
12 described in section IV below and attached hereto, the Supervisor in the exercise of his
13 judgment, is ordering RILP to remediate, repair, or replace the oil wells, tanks, and/or
14 other attendant production facilities and infrastructure present on Rincon Island, in order
15 to prevent possible damage to life, health, property and natural resources.

16
17 **II. Definitions**

18
19 **"Operator"** means "a person who, by virtue of ownership, or under the authority
20 of a lease or any other agreement, has the right to drill, operate, maintain, or control a
21 well or production facility." (Pub. Resources Code, § 3009.)

22 **"Idle well"** means a well that has not produced oil or natural gas, or been used for
23 injection, for six consecutive months during the last 5 (five) or more years. (Pub.
24 Resources Code, § 3008, subd. (e).)

1 **“Long –term idle well”** means a well that has not produced oil or natural gas, or
2 been used for injection, for six consecutive months during the last 10 (ten) or more years.
3 (Pub. Resources Code, § 3008, subd. (e).)

4 **“Production facility”** means any equipment attendant to oil and gas production or
5 injection operations. (Pub. Resources Code, § 3010.)

6
7 **III. State Oil and Gas Supervisor Authority**

8
9 **Public Resources Code section 3106, and Title 14, California Code of**
10 **Regulations, section 1740.1,** authorizes the Supervisor to supervise the operation of oil
11 and gas wells and production facilities to “prevent, as far as possible, damage to life,
12 health, property, and natural resources”

13 **Public Resources Code section 3235** provides that the Supervisor may upon his
14 or her own initiative make an investigation of wells within the State.

15 **Public Resources Code section 3224** provides that the Supervisor shall order
16 remedial work which, in his or her judgement, is necessary to prevent damage to life,
17 health, property, and natural resources.

18 **Public Resources Code section 3013** provides that Division 3 of the Public
19 Resources Code (sections 3000 through 3865) pertinent to oil and gas, shall be construed
20 to allow the Supervisor to have all powers necessary to carry out the purposes of the
21 Division.

22 **Public Resources Code section 3270, subdivision (d)** requires operators to
23 maintain records of maintenance and repair operations, tests and inspections, and to
24 provide the Supervisor with access to such records upon request.

1 **Title 14 of the California Code of Regulations, section 1724.4, subdivision (d)**
2 requires operators to maintain and make available to the Division records pertinent to the
3 status and history of any well safety device installed in any well, and the records of
4 inspections, tests, and replacements thereof.

5 **Title 14 of the California Code of Regulations, section 1722, subdivision (a)**
6 requires that all oil and gas operations be conducted in accordance with good oilfield
7 practice.

8 **Title 14 of the California Code of Regulations section 1742, subdivision (b),**
9 requires well designations to be affixed to the wellhead or guard rail of each completed
10 well. Identifying signs shall be maintained in a legible condition.

11 **Title 14 of the California Code of Regulations section 1742, subdivision (c),**
12 requires platforms, islands, or other fixed structures to be identified at two diagonal
13 corners of the structure by a sign with letters and figures not less than 12 inches in height,
14 identifying the structure designation, the name of lease operator, and the lease
15 designation.

16 **Title 14 of the California Code of Regulations section 1747.3** requires that all
17 oil field containment infrastructure be constructed and maintained in good condition in all
18 deck areas and in a manner necessary to collect all contaminants, to prevent discharge of
19 oil into the ocean waters, including the prevention of any oil flow into the wellhead area
20 of a platform.

21 **Title 14 of the California Code of Regulations section 1773.5** requires
22 operators to manage out-of-service production facilities by certain specific methods, i.e.:

- 23 ● removing fluids, sludge, hydrocarbons, and solids from any pipelines and other
24 in-service equipment, and disconnecting such production facilities.
- 25 ● properly managing associated gas with local air district requirements.

1 ● removing “clean-out” doors or hatches on out-of-service tanks and installing
2 heavy gauge steel mesh grates over openings to allow for visual inspection and
3 prevent unauthorized access.

4 ● properly labeling out-of-service tanks and vessels.

5 ● removing valves and fittings to prevent unauthorized use.

6 ● properly managing pipelines associated with out-of-service tanks and vessels.

7 **Title 14 of the California Code of Regulations section 1775, subdivision (a),**
8 requires oilfield wastes, including but not limited to oil, water, chemicals, mud, and
9 cement, to be disposed of a manner as not to cause damage to life, health, property,
10 surface waters, or natural resources, or be a menace to public safety.

11 **Title 14 of the California Code of Regulations section 1775, subdivision (c),**
12 requires that any unused equipment, scrap materials, or trash/waste attendant to oilfield
13 operations be removed from a production or injection operations area and/or stored in
14 such a manner as to not cause damage to life, health, or property, or become a public
15 nuisance or a menace to public safety.

16 **Title 14 of the California Code of Regulations section 1777** requires operators
17 to maintain production facilities in good condition and in a manner to prevent leakage or
18 corrosion, and to safeguard life, health, property, and natural resources. Such
19 maintenance obligations include, but are not limited to, conducting external visual
20 inspections at least once a month of aboveground production facilities for leaks and
21 corrosion, and repairing or replacing facilities that are not operating properly or are
22 leaking, as well as ensuring that well cellars are kept drained.

23 **Title 14 of the California Code of Regulations, section 1748.3, subdivision (d)**
24 requires that operators maintain an accurate, operating pressure gauge at the wellhead at
25 all times.

1 **IV. Facts**

2
3 RILP operates wells within State lease PRC1466. State lease 1466 includes within
4 its boundary, Rincon Island, a manmade island situated close to shore off the coastline in
5 Ventura County, California. Rincon Island is accessed by motor vehicles by way of a
6 “causeway” or pier, running from shore to the island, and is accessed by ocean-going
7 vessels via a wharf constructed on the island. A schematic diagram of Rincon Island and
8 the facilities present there is attached hereto as Exhibit A.

9 On February 23, 2016 Division inspectors were present at Rincon Island and
10 inspected the island, the island’s wells, and other equipment attendant to oil and gas
11 production or injection operations. During the February 23, 2016 inspection, numerous
12 aspects of the production facilities and infrastructure attendant to oil and gas operations
13 were observed to be in a severe state of disrepair. Attached hereto as Exhibits B(1)
14 through B(4) are photographic images of some of the production facilities (i.e., pipes,
15 valves, fluid lines, well slot covers, etc.) observed on February 23, 2016 by Division
16 inspectors. Exhibits B(1) through B(4) are included here to depict examples of the state
17 of disrepair of the facilities and infrastructure on Rincon Island. During the February 23,
18 2016 inspection, numerous violations of law and regulations were noted by Division
19 inspectors. The violations observed on February 23, 2016 are specifically notated on
20 Exhibit C attached hereto. The violations observed on February 23, 2016 can be generally
21 summarized as follows:

- 22 ● numerous “well slots” and/or “risers” situated in the “wellbay” are improperly
23 covered and in a severe and unsafe state of disrepair and dysfunction;
- 24 ● numerous wells, valves, pipes, pressure gauges, and other equipment attendant
25 to oil and gas production or injection operations are severely corroded and in an unsafe

1 state of disrepair and dysfunction;

2 • numerous tanks, lines, pipes, are improperly managed in the form of improper or
3 non-existent labeling, improper or non-existent disconnections, improper or non-existent
4 treatment of “manway” openings, improper failure to empty tanks and pipelines of fluids
5 or gases, and un-remedied leaks, corrosion and disrepair of tanks and pipelines.

6 After the inspection occurring on February 23, 2016, Division inspector(s)
7 communicated the existence of the violations notated on Exhibit C attached hereto to
8 RILP field personnel at Rincon Island. Based on information and belief, the Division
9 understands that since February 23, 2016, some of the violations at Rincon Island notated
10 on Exhibit C attached hereto may have been cured or remediated. To the extent any such
11 violations remain, Operator is hereby ordered to undertake the following remedial
12 actions.

13
14 **V. Operator’s Required Actions**

15
16 For the reasons stated above, **IT IS HEREBY ORDERED**, pursuant to Public
17 Resources Code sections 3106, subdivision (a), 3224, and 3225, that **Operator shall, on**
18 **or before June 1, 2016:**

19
20 **A.** Repair, replace and/or remediate, to the satisfaction of the Supervisor (through
21 Division inspectors), each violation appearing in the column labeled “Violation” on
22 Exhibit B attached hereto;

23
24 **B.** Provide the Supervisor with copies of all records (pertinent to the wells and
25 production facilities on Rincon Island) of maintenance, repairs, test, and inspections, in

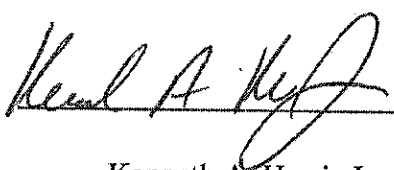
1 accordance with Public Resources Code section 3270, subdivision (d) and Title 14 of the
2 California Code of Regulations, section 1724.4, subdivision (d), and as required by this
3 Order pursuant to Title 14 of the California Code of Regulations, section 1724,
4 subdivision (d), if applicable.

5
6 C. Prepare and submit to the Supervisor a report describing the work undertaken
7 by RILP to achieve the above-required repair, replacement or remediation, which
8 includes but is not limited to, (a) a written description of the repair, replacement and/or
9 remediation undertaken, and (b) photographic imagery of the repair, replacement and/or
10 remediation work.

11 12 VI. Operator's Right to Appeal

13
14 Operator may appeal this Order by filing a written notice of appeal with the
15 Director of the California Department of Conservation as described in Article 6 (Appeals
16 and Review) of Division 3 of the Public Resources Code, commencing with Public
17 Resources Code section 3350. (See also, Pub. Resources Code, § 3225, subd. (d).)
18 Failure to timely file a notice of appeal will waive Operator's right to challenge this
19 Order. If not timely appealed, this Order will become final. When the order becomes
20 final, the required actions become due, as described above in Section "V." (Operator's
21 Required Actions). If Operator timely files a notice of appeal, the Director will inform
22 the Operator of the appeal hearing date, time, and place. Following the hearing, Operator
23 will receive a written decision that affirms, sets aside, or modifies the Order.

1 DATED: April 11, 2016



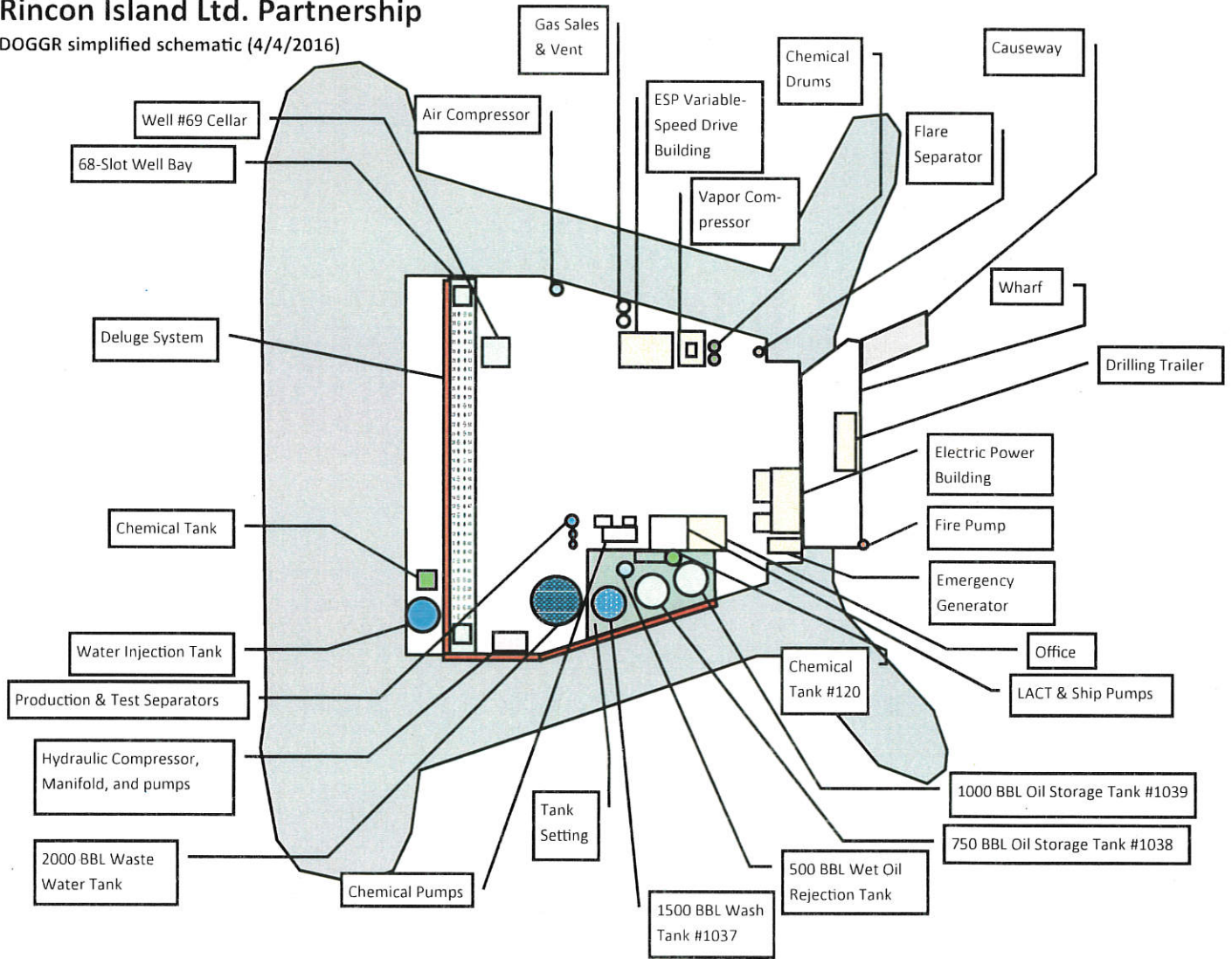
Kenneth A. Harris Jr.
State Oil and Gas Supervisor

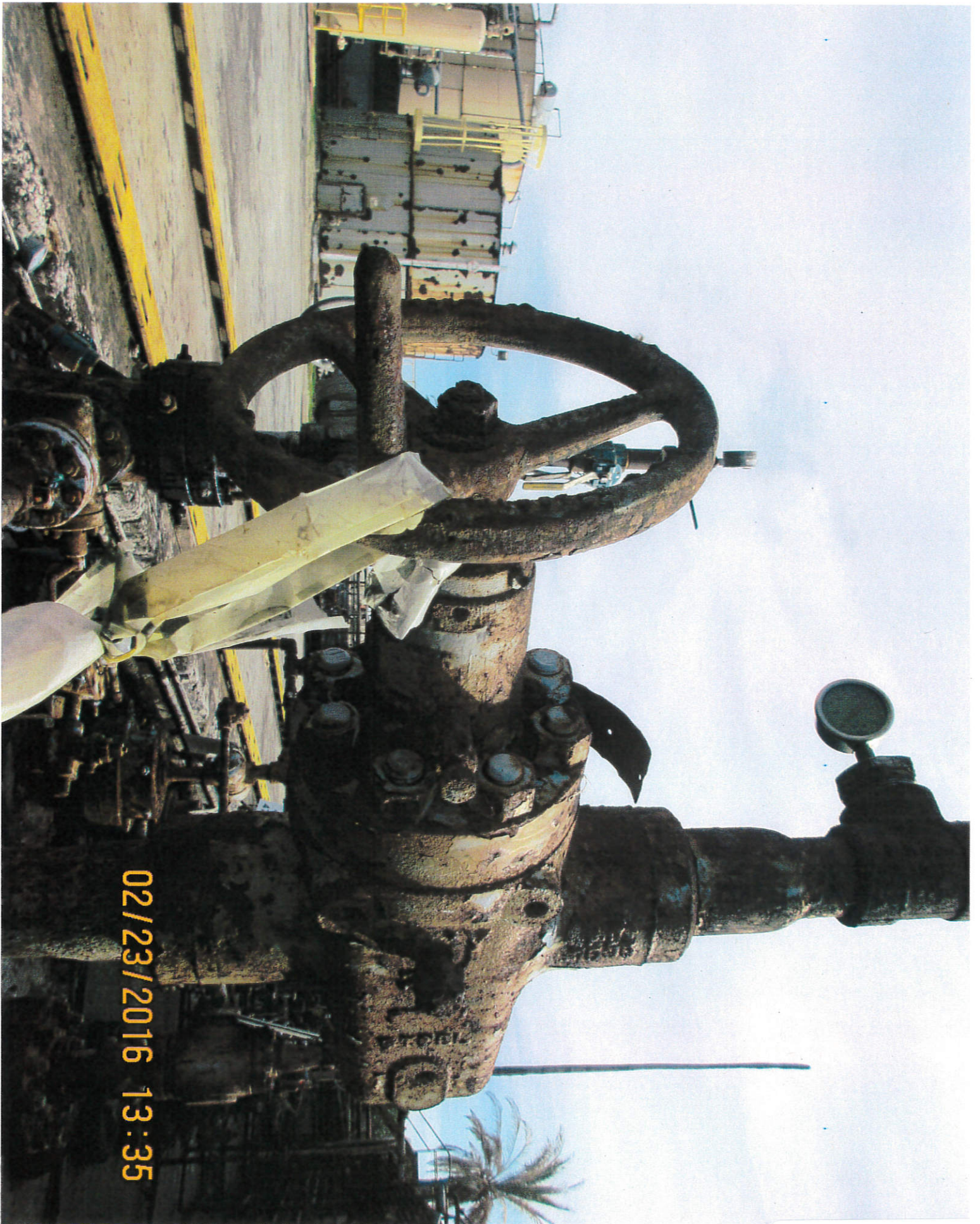
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**ORDER TO REMEDIATE WELLS AND PRODUCTIONS FACILITIES TO PREVENT DAMAGE TO LIFE,
HEALTH, PROPERTY, AND NATURAL RESOURCES**

Rincon Island Ltd. Partnership
DOGGR simplified schematic (4/4/2016)





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EXHIBIT B(1)



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EXHIBIT B(2)



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EXHIBIT B(3)



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EXHIBIT B(4)

DIVISION OF OIL, GAS GEOTHERMAL RESOURCES

Inspection Report Table - Exhibit C to Order No. 1112

Site: Rincon Island, Ventura County / Operator: Rincon Island Limited Partnership

Inspection Date: 2/23/2016

TANK, SPECIFIC LOCATION, WELL SLOT OR WELL NO. SPECIFIED	VIOLATION	DOGGR Notes	
		DOGGR Notes	CCR or PRC
Island	No signs at diagonal corners		1742(c)
Well Bay	Fluid in bay; Drains (2) uncovered	Entire well bay has oil on the floor. Fluid is in the bay because the waste fluid tank is full.	1747.3 1775(a) 1777(a)
2	Cover not adequately secured to safeguard life, health, property, and natural resources	Riser only	1777(a)
3	Cover not adequately secured to safeguard life, health, property, and natural resources	Riser only	1777(a)
4	Cover not adequately secured to safeguard life, health, property, and natural resources	Riser only	1777(a)
5	Cover not adequately secured to safeguard life, health, property, and natural resources	Riser only	1777(a)
6	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Unused equipment on site	Valve and fitting sitting on floor causing tripping hazard	1775(c) 1777(a)
7	Cover not adequately secured to safeguard life, health, property, and natural resources	Riser only	1777(a)
8	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe		1777(a)
9	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable		1777(a)
10	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable		1777(a)
811	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable		1777(a)

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TANK, SPECIFIC LOCATION, WELL SLOT OR WELL NO. SPECIFIED	VIOLATION	DOGGR Notes	
			CCR or PRC
12	Corroded cover; Cover not adequately secured to safeguard life, health, property, and natural resources	Riser only	1777(a)
13	Cover not adequately secured to safeguard life, health, property, and natural resources	Riser only	1777(a)
14	Cover not adequately secured to safeguard life, health, property, and natural resources	Riser only	1777(a)
15	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts; potentially unsafe; Ball valve inoperable; No pressure gauges		1777(a) 1748.3(d)
16	Cover not adequately secured to safeguard life, health, property, and natural resources	Riser only	1777(a)
17	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable		1777(a)
18	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe		1777(a)
19	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Unable to verify functionality of pressure gauges		1777(a) 1748.3(d)
20	Corroded cover; Cover not adequately secured to safeguard life, health, property, and natural resources		1777(a)
21	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable; No well sign		1742(b) 1777(a)

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TANK, SPECIFIC LOCATION, WELL SLOT OR WELL NO. SPECIFIED	VIOLATION	DOGGR Notes	CCR or PRC
22	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe;		1777(a)
23	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable		1777(a)
24	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe;		1777(a)
25	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe;		1777(a)
26	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe;		1777(a)
27	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable		1777(a)
28	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe;		1777(a)
29	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe;	Tubing gauge and master valve ARE operable	1777(a)
30	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe;		1777(a)
31	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe;		1777(a)

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		DOGGR Notes	CCR or PRC
32	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe;		1777(a)
33	Unused equipment on site; Cover not adequately secured to safeguard life, health, property, and natural resources	Riser only. Control box sitting on top of riser cover.	1775(c) 1777(a)
34	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe;		1777(a)
36	Cover not adequately secured to safeguard life, health, property, and natural resources	Riser only	1777(a)
37	Cover not adequately secured to safeguard life, health, property, and natural resources	Riser only	1777(a)
38	Cover not adequately secured to safeguard life, health, property, and natural resources; Uncovered bucket of fluid	Riser only	1775(a) 1777(a)
39	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable; Unable to verify functionality of gauge	Injection source well	1777(a) 1748.3(d)
40	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable		1777(a)
941	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable		1777(a)
42	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe;		1777(a)

DIVISION OF OIL, GAS GEOTHERMAL RESOURCES

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TANK, SPECIFIC LOCATION, WELL SLOT OR WELL NO. SPECIFIED	VIOLATION	DQGGR Notes	
			CCR or PRC
43	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Unable to verify functionality of pressure gauges	casing gauge closed	1777(a) 1748.3(d)
44	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable; Unable to verify functionality of pressure gauges		1777(a) 1748.3(d)
45	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable		1777(a)
46	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable		1777(a)
47	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable		1777(a)
48	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Unable to verify functionality of pressure gauges		1777(a) 1748.3(d)
49	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable	Abandoned injection line open at one end with standing oil in it	1777(a)

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		DOGGR Notes	CCR or PRC
50	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable; Leaking from top of master valve		1777(a) 1777(c)(1)
51	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable		1777(a)
52	Cover not adequately secured to safeguard life, health, property, and natural resources	Riser only	1777(a)
53	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Unable to verify functionality of pressure gauges		1777(a) 1748.3(d)
54	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable; No pressure gauges		1777(a) 1748.3(d)
55	Corroded cover; Cover not adequately secured to safeguard life, health, property, and natural resources	Riser only	1777(a)
56	Corroded cover; Cover not adequately secured to safeguard life, health, property, and natural resources	Riser only	1777(a)
57	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe;		1777(a)
58	Corroded cover; Cover not adequately secured to safeguard life, health, property, and natural resources	Riser only	1777(a)

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TANK, SPECIFIC LOCATION, WELL SLOT OR WELL NO. SPECIFIED	VIOLATION	DOGGR Notes	
			CCR or PRC
59	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable		1777(a)
60	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; No pressure gauges		1777(a) 1748.3(d)
61	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable		1777(a)
62	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable; No pressure gauges		1777(a) 1748.3(d)
63	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe;		1777(a)
64	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable		1777(a)
65	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable; Gauges inoperable		1777(a) 1748.3(d)
66	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable		1777(a)

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		DOGGR Notes	CCR or PRC
67	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Ball valve inoperable; Unable to verify functionality of pressure gauges		1777(a) 1748.3(d)
68	Cover not adequately secured to safeguard life, health, property, and natural resources	Riser only	1777(a)
69	Corroded equipment on wellhead including valves, handles, piping, flanges, plugs, nuts and bolts - potentially unsafe; Fluid in cellar; Cellar uncovered; Gas bubbles rising from under the cellar fluid	Fluid is still in the cellar because the tank is full	1777(a) 1777(c)(3)
Water Injection Tank	No tank type; No tank ID; No Hazard placard; No secondary containment	Unknown to employee if tank is idle or Out Of Service (OOS)-DOGGR to be notified. If OOS-all OOS regulations need to be complied with	1773.3(a) 1773.1
Chemical tank	No tank type; No tank ID; No Hazard placard	Next to Water injection Tank	1773.3(a)
Tank Setting	Weeds; Unused equipment on site; Refuse on site	Located on south side of island	1777(c)(2) 1775(a) 1775(c)
2000 BBL Waste Water Tank	Not disconnected from all pipe; No OOS date on tank; Manways not open & screened; Not emptied & degassed	OOS	1773.5(a)
500 BBL Wet Oil Rejection Tank	Not disconnected from all pipe; No OOS date on tank; Manways not open & screened; Not emptied & degassed	OOS-500 bbl	1773.5(a)

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		DOGGR Notes	CCR or PRC
1500 BBL Wash Tank #1037	No tank ID; No tank type	wash-1500 bbl	1773.3(a)
750 BBL Oil Storage Tank #1038	No tank ID; No tank type	Stock-750bbl	1773.3(a)
1000 BBL Oil Storage Tank #1039	Not disconnected from all pipe; No OOS date on tank; Manways not open & screened; Not emptied & degassed	OOS because of leaks-will be repaired, Stock 1,000 bbl	1773.5(a)
Production & Test Separators	Flare line corroded with holes	OOS	1777(a)
Gas Sales & Vent Scrubbers	Corroded equipment including valves, handles, piping, and plugs - potentially unsafe		1777(a)
Vapor Compressor	Corroded equipment including valves, handles, piping and plugs - potentially unsafe		1777(a)

PROOF OF SERVICE BY CERTIFIED U.S. MAIL

- 1) I am at least 18 years of age, not a party to this action, and I am a resident of or employed in the county where the mailing took place.
- 2) My business address is: Department of Conservation, Division of Oil, Gas, and Geothermal Resources, Headquarters, 801 K Street, MS 18-05, Sacramento, CA 95814-3530

- 3) I served a copy of the following documents:

ORDER TO REMEDIATE WELLS AND PRODUCTION FACILITIES TO PREVENT DAMAGE TO LIFE, HEALTH, PROPERTY, AND NATURAL RESOURCES ORDER NO. 1112

by enclosing them in an envelope and placing the envelope for collection and mailing by certified U.S. mail on the date and at the place shown in item 4 following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

- 4) The envelope was addressed and mailed as follows:

- a. Name of person served:

Ms. Susan Whalen, Agent
Rincon Island Limited Partnership

- b. Address:

5750 W. Pacific Coast Hwy.
Ventura, CA 93001-9748

- c. Date mailed: April 11, 2016

- d. Place of mailing: Sacramento, California

- 5) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 4/11/16

Name: DANA Lolmaugh

Signature: 