

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

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

ORDER TO PAY A CIVIL PENALTY AND PERFORM REMEDIAL WORK
NO. 1661

Operator: West Energy Operating LLC (11109)
Field Names: Canfield Ranch and Bellevue
Central District, Kern County

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, West Energy Operating, LLC (**Operator**) is the "operator" (as defined in PRC, § 3009) and is responsible for the Wells and associated Production Facilities identified on **Attachment A**, incorporated herein (the "**Wells**" and "**Facilities**"). As described in more detail below, Operator has not maintained compliance with applicable requirements for operation of the Wells and the Facilities. Operator's failure to comply with the Regulations poses a potential threat to life, health, property, and natural resources and constitute violations requiring remedial work and for which the Supervisor has determined imposition of a civil penalty is appropriate. Therefore, pursuant to PRC sections 3013, 3106, 3224, 3225, 3226, 3236.5, and 3270 and Regulations sections 1722, 1773.1, 1773.3, 1773.4, 1773.5, 1775, 1774.1, and 1777, the Supervisor is ordering Operator to (1) perform remedial work to bring the Wells and Facilities into compliance and (2) pay an administrative civil penalty for the violations.

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

II. Alleged Acts and Omissions

Based on CalGEM's records, at all times relevant to this Order, Operator was the operator, as defined in PRC section 3009, of the Wells and Facilities. On or about May 1, 2025, September 15, 2025, and November 4, 2025, CalGEM conducted inspections of the Wells and Facilities where the violations described below were observed and documented in the Canfield Ranch and Bellevue Fields (**Attachments D, E, and F** incorporated herein).

CalGEM records reflect Operator has not maintained compliance with applicable requirements for operation of the Wells and the Facilities. Operator's lack of adherence to the

Regulations poses a potential threat to life, health, property, and natural resources. The violations at issue are identified below.

A. Failure to perform pipeline testing. (Regulations § 1774.1, subd. (f).)

Operators shall perform periodic mechanical integrity testing on all active environmentally sensitive pipelines that are gathering lines, and all urban pipelines over 4" in diameter, and all active gas pipelines in sensitive areas. The mechanical integrity testing shall be conducted every 2 years (Regulations, § 1774.1, subd. (f)).

CalGEM has not received the requested pipeline mechanical integrity data (**Attachment C**, incorporated herein), in violation of Regulations section 1774.1, subdivision (f), at the following production facilities:

Facility Setting ID	Facility Setting Name	District	Facility (Component) ID	Facility (Component) Name	Facility (Component) Type
90318241	Hall-Edgar 73-24 Gas Line	Central	18486	Hall-Edgar 73-24	Pipeline Segment
90318231	Gosford 174-23 Gas Line	Central	18475	Gosford 174-23	Pipeline Segment
90318248	KCL 2 67X-23 Gas Line	Central	18493	KCL 2 67X-23	Pipeline Segment
90318243	KCL 2 47-23 Gas Line	Central	18488	KCL 2 47-23	Pipeline Segment
90318230	Gosford 171-23 Gas Line	Central	18474	Gosford 171-23	Pipeline Segment
90318227	Edgar 51X-24 Gas Line	Central	18471	Edgar 51X-24	Pipeline Segment
90318238	Hall-Edgar 71-24 Gas Line	Central	18482	Hall-Edgar 71-24	Pipeline Segment
90318229	Edgar 52-24 Gas Line	Central	18473	Edgar 52-24	Pipeline Segment
90318250	KCL Gosford A 17-13 Gas Line	Central	18495	KCL Gosf A 17-13	Pipeline Segment

90318226	Edgar 41-24 Gas Line	Central	18470	Edgar 41-24	Pipeline Segment
90318244	KCL 2 56-23 Gas Line	Central	18489	KCL 2 56-23	Pipeline Segment
90318228	Edgar 41X-24 Gas Line	Central	18472	Edgar 41X-24	Pipeline Segment
90318239	Hall-Edgar 72-24 Gas Line	Central	18483	Hall-Edgar 72-24	Pipeline Segment
90318242	Hall-Edgar 82-24 Gas Line	Central	18487	Hall-Edgar 82-24	Pipeline Segment
90318225	Edgar 44X-24 Gas Line	Central	18469	Edgar 44X-24	Pipeline Segment
90318260	KCL Gosford A 48X-13 Gas Line	Central	18503	KCL Gos A 48X-13	Pipeline Segment

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

B. Failure to conduct good oilfield practice. (Regulations § 1722, subd. (a).)

Operators are required to maintain production facilities in good condition and in a manner to prevent leakage or corrosion and to safeguard life, health, property, and natural resources and conduct operations in accordance with good oilfield practices. (Regulations, § 1722, subd. (a).)

During the inspection, CalGEM observed weeds within 5-10ft of the wellhead/pumping unit, in violation of Regulations, section 1722, subdivision (a):

API	Well Designation
0402942840	Houghton 46X-35

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

C. Failure to maintain bull plugs on wellhead. (Regulations, § 1777, subd. (a).)

The wellhead is the structure and pressure-containing component secured to the surface of a well. Missing bull plugs on the wellhead may lead to leaking around the wellhead

or failure to maintain well pressure. Production facilities include wellheads. (PRC, § 3010; Regulations, § 1760, subd. (r).) Operators are required to maintain production facilities in good condition and in a manner to prevent leakage or corrosion and to safeguard life, health, property, and natural resources and conduct operations in accordance with good oilfield practices. (Regulations, §§ 1722, subd. (a); 1777, subd. (a).)

During the inspection, CalGEM observed bull plugs missing from the wellhead at the following well, in violation of Regulations, section 1777, subdivision (a):

API	Well Designation
0403007350	Waterbank Fee 36X-14

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

D. Failure to remove oilfield waste and refuse. (Regulations § 1775, subd. (a).)

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

During the inspection, CalGEM observed oilfield waste comprising soil contaminated with oil due to leaks and overflow from well cellar that had not been properly disposed of, in violation of Regulations section 1775, subdivision (a), at the following well:

API	Well Designation
0402942840	Houghton 46X-35

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

E. Failure to maintain well sign. (Regulations, § 1722.1.1, subd. (a).)

Regulations section 1722.1.1, subdivision (a) requires operators to maintain signs identifying wells on the premises from the time the well is drilled until the well is plugged and abandoned.

During the inspection, CalGEM observed the following well to lack a well sign, in violation of Regulations, section 1722.1.1, subd. (a):

API	Well Designation
0403007350	Waterbank Fee 36X-14

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

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

The well cellar is an excavated area around the wellhead that provides space for equipment at the top of the wellbore. Operators are required to keep well cellars drained. Well cellars are to be covered with grating or flooring and shall be maintained in good condition so as to exclude people and animals. (Regulations, § 1777, subd. (c)(3).)

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

API	Well Designation
0403020995	Hall-Edgar 82-24

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

III. Civil Penalty/Remedial Work

A. Civil Penalty

Based on the foregoing Alleged Acts and Omissions and pursuant to PRC section 3236.5, by this Order the Supervisor imposes on Operator an administrative civil penalty totaling seven thousand two hundred twenty-five dollars (\$7,225.00) for the 22 violations.

Violation Description	Number of Violations	Associated Civil Penalty per Violation	Civil Penalty Totals
Failure to perform pipeline testing. (Regulations, § 1774.1, subd. (f).) 18486 18475 18493 18488 18474 18471 18482 18473	16	\$300	\$4,800

1	18495			
2	18470			
3	18489			
4	18472			
5	18483			
6	18487			
7	18469			
8	18503			
9	Failure to conduct good oilfield practices (Regulations, § 1722, subd. (a).) 0402942840	1	\$525	\$525
10	Failure to maintain well sign (Regulations, § 1722.1.1, subd. (a).) 0403007350	1	\$200	\$200
11	Failure to remove oilfield waste and refuse (Regulations, § 1775, subd. (a).) 0402942840	1	\$750	\$750
12	Failure to Maintain Bull Plugs on Wellhead (Regulations, § 1777, subd. (a).) 0403007350,	1	\$350	\$350
13	Failure to Keep Well Cellar <u>Drained</u> and <u>Covered</u> (Regulations, § 1777, subd. (c)(3).) 0403020995	2	\$300	\$600
14			Total Civil Penalty:	\$7,225

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 following: the Wells and pipelines are inside a health protection zone, as defined by Regulations section 1765.1, subdivision (b), a Well and pipelines are environmentally sensitive, as defined by Regulations section 1760, subdivision (f), a Well is critical well, as defined by Regulations section 1720, subdivision (a), and the pipelines are located in an urban area, as defined by Regulations section 1760, subdivision (y).

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B. Remedial Work

Pursuant to PRC sections 3224 and 3226, the Supervisor hereby orders Operator to complete remedial work to come into compliance with Regulations sections 1722, 1773.1, 1773.3, 1773.4, 1773.5, 1775, and 1777, as outlined below in Operator’s Required Actions.

IV. Operator’s Required Actions

For the reasons stated herein, pursuant to PRC sections 3013, 3106, 3224, 3225, 3226, and 3236.5, and Regulations sections 1722, 1773.1, 1773.3, 1773.4, 1773.5, 1775, and 1777, **IT IS HEREBY ORDERED** that within 30 days, Operator:

- 1) Pay an administrative civil penalty of seven thousand two hundred twenty-five dollars (\$7,225.00); and

To remit payment of the civil penalty 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 penalty 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 1803
Sacramento, California 95814

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

- 2) In accordance with PRC section 3224 and Regulations sections 1722, 1773.1, 1773.3, 1773.4, 1773.5, 1775, and 1777 Operator is required to:
 - a. Perform pipeline testing:

Facility Setting ID	Facility Setting Name	District	Facility (Component) ID	Facility (Component) Name	Facility (Component) Type
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90318241	Hall-Edgar 73-24 Gas Line	Central	18486	Hall-Edgar 73-24	Pipeline Segment
90318231	Gosford 174-23 Gas Line	Central	18475	Gosford 174-23	Pipeline Segment
90318248	KCL 2 67X-23 Gas Line	Central	18493	KCL 2 67X-23	Pipeline Segment
90318243	KCL 2 47-23 Gas Line	Central	18488	KCL 2 47-23	Pipeline Segment
90318230	Gosford 171-23 Gas Line	Central	18474	Gosford 171-23	Pipeline Segment
90318227	Edgar 51X-24 Gas Line	Central	18471	Edgar 51X-24	Pipeline Segment
90318238	Hall-Edgar 71-24 Gas Line	Central	18482	Hall-Edgar 71-24	Pipeline Segment
90318229	Edgar 52-24 Gas Line	Central	18473	Edgar 52-24	Pipeline Segment
90318250	KCL Gosford A 17-13 Gas Line	Central	18495	KCL Gosf A 17-13	Pipeline Segment
90318226	Edgar 41-24 Gas Line	Central	18470	Edgar 41-24	Pipeline Segment
90318244	KCL 2 56-23 Gas Line	Central	18489	KCL 2 56-23	Pipeline Segment
90318228	Edgar 41X-24 Gas Line	Central	18472	Edgar 41X-24	Pipeline Segment
90318239	Hall-Edgar 72-24	Central	18483	Hall-Edgar 72-24	Pipeline Segment

	24 Gas Line				
90318242	Hall-Edgar 82-24 Gas Line	Central	18487	Hall-Edgar 82-24	Pipeline Segment
90318225	Edgar 44X-24 Gas Line	Central	18469	Edgar 44X-24	Pipeline Segment
90318260	KCL Gosford A 48X-13 Gas Line	Central	18503	KCL Gos A 48X-13	Pipeline Segment

b. Dispose oilfield waste and refuse:

API	Well Designation
0402942840	Houghton 46X-35

c. Remove weeds from wellhead/pumping unit:

API	Well Designation
402942840	Houghton 46X-35

d. Drain the well cellar and replace missing cellar covering (grating or flooring), at the following Well:

API	Well Designation
403020995	Hall-Edgar 82-24

e. Maintain well sign, at the following Well:

API	Well Designation
403007350	Waterbank Fee 36X-14

f. Maintain bull plugs, at the following Well:

API	Well Designation
403007350	Waterbank Fee 36X-14

1 Upon performing the required remedial work, please contact CalGEM's Central District
2 via email at CalGEMCentralEnvironmental@conservation.ca.gov.

3 **V. Operator's Appeal Rights**

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

9 Department of Conservation
10 Director's Office of Appeals
11 715 P Street, MS 19-06 (Legal Office, Chief Counsel)
Sacramento, California 95814

12 Or via electronic mail to:

13 OfficeofAppeals@conservation.ca.gov

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

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

24 **VI. Other Potential Actions to Enforce This Order**

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

DATED: 7/23/2026

Doug Ito

Doug Ito
State Oil and Gas Supervisor

Service List

Via Certified Mail

William Kelleher
c/o West Energy Operating
351 Dayloma Ave.
Ventura, CA. 93001

West Energy Operating
1201 North Catalina Ave., #577
Redondo Beach, CA. 90277

Via Email

Wkelleher@westenergyoperating.com

Attachment A

(Wells and Production Facilities)

Operator Name: West Energy Operating, LLC

Operator Code: 11109

API	Well Designation	District
403020995	Hall-Edgar 82-24	Central
403007350	Waterbank Fee 36X-14	Central
402942840	Houghton 46X- 35	Central

Facility Setting ID	Facility Setting Name	District	Facility (Component) ID	Facility (Component) Name	Facility (Component) Type
90318241	Hall-Edgar 73-24 Gas Line	Central	18486	Hall-Edgar 73- 24	Pipeline Segment
90318231	Gosford 174-23 Gas Line	Central	18475	Gosford 174- 23	Pipeline Segment
90318248	KCL 2 67X-23 Gas Line	Central	18493	KCL 2 67X-23	Pipeline Segment
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90318230	Gosford 171-23 Gas Line	Central	18474	Gosford 171- 23	Pipeline Segment
90318227	Edgar 51X-24 Gas Line	Central	18471	Edgar 51X-24	Pipeline Segment
90318238	Hall-Edgar 71-24 Gas Line	Central	18482	Hall-Edgar 71- 24	Pipeline Segment
90318229	Edgar 52-24 Gas Line	Central	18473	Edgar 52-24	Pipeline Segment
90318250	KCL Gosford A 17-13 Gas Line	Central	18495	KCL Gosf A 17-13	Pipeline Segment

90318226	Edgar 41-24 Gas Line	Central	18470	Edgar 41-24	Pipeline Segment
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90318228	Edgar 41X-24 Gas Line	Central	18472	Edgar 41X-24	Pipeline Segment
90318239	Hall-Edgar 72-24 Gas Line	Central	18483	Hall-Edgar 72-24	Pipeline Segment
90318242	Hall-Edgar 82-24 Gas Line	Central	18487	Hall-Edgar 82-24	Pipeline Segment
90318225	Edgar 44X-24 Gas Line	Central	18469	Edgar 44X-24	Pipeline Segment
90318260	KCL Gosford A 48X-13 Gas Line	Central	18503	KCL Gos A 48X-13	Pipeline Segment

Attachment B

Definitions and Authorities

Definitions

PRC section 3008, subdivision (a), defines “well” to mean, among other things, “any oil or gas well or well for the discovery of oil or gas; any well on lands producing or reasonably presumed to contain oil or gas.”

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 (a), defines critical well to mean a well within: 300 feet of any building intended for human occupancy that is not necessary to the operation of the well or any airport runway; or 100 feet of any dedicated public street, highway, or nearest rail of an operating railway that is in general use, any navigable body of water or watercourse perennially covered by water, any public recreational facility such as a golf course, amusement park, picnic ground, campground, or any other area of periodic high-density population, or any officially recognized wildlife preserve.

Regulations section 1760, subdivision (f), defines environmentally sensitive as any of the following:

(1) A production facility within 300 feet of any public recreational area, or a building intended for human occupancy that is not necessary to the operation of the production operation, such as residences, schools, hospitals, and businesses.

(2) A production facility within 200 feet of any officially recognized wildlife preserve or environmentally sensitive habitat that is designated on a United States Geological Survey

topographical map, designated waterways, or other surface waters such as lakes, reservoirs, rivers, canals, creeks, or other water bodies that contain water throughout the year.

(3) A production facility within the coastal zone as defined in Section 30103(b) of the Public Resources Code.

(4) Any production facility which the Supervisor determines may be a significant potential threat to life, health, property, or natural resources in the event of a leak, or that has a history of chronic leaks.

Regulations section 1760, subdivision (y), defines urban area as a cohesive area of at least twenty-five business establishments, residences, or combination thereof, the perimeter of which is 300 feet beyond the outer limits of the outermost structures.

State Oil and Gas Supervisor Authority

PRC section 3013 provides “this division shall be liberally construed to meet its purposes, and the director and the supervisor, acting with the approval of the director, shall have all powers, including the authority to adopt rules and regulations, which may be necessary to carry out the purposes of this division.”

PRC section 3106 authorizes the Supervisor to supervise the drilling, operation, maintenance, and abandonment of oil and gas wells to “prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil and gas deposits from infiltrating water and other causes; loss of oil, gas, or reservoir energy, and damage to underground and surface waters suitable for irrigation or domestic purposes by the infiltration of, or the addition of, detrimental substances.”

PRC section 3224 mandates that the Supervisor “order such tests or remedial work as in his judgment are necessary to prevent damage to life, health, property, and natural resources; to protect oil and gas deposits from damage by underground water; or to prevent the escape of water into underground formations, or to prevent the infiltration of detrimental substances into underground or surface water suitable for irrigation or domestic purposes, to the best interests of the neighboring property owners and the public.”

1 **PRC section 3225**, in relevant part, provides that “an order of the supervisor or a district
2 deputy issued pursuant to this chapter shall provide a clear and concise recitation of the acts
3 or omissions with which the operator is charged. The order shall state all penalties and
4 requirements imposed on the operator in connection with the acts or omissions charged and
5 the order shall provide references to the provisions of this code and the regulations that
6 support the imposition of the penalties and requirements. An order of the supervisor or a district
7 deputy shall be in writing and shall be served on the operator by personal service or by
8 certified mail. When the supervisor or a district deputy issues a written order concerning an
9 operation, an appeal may be made from the order pursuant to the procedures contained in
10 Article 6 (commencing with Section 3350). The order shall inform the operator of its right to
11 appeal the order.”

12 **PRC section 3226, subdivision (a)**, provides that “within 30 days after service of an order
13 pursuant to Sections 3224 and 3225, or Section 3237, or if there has been an appeal from the
14 order to the director, within 30 days after service of the decision of the director, or if a review
15 has been taken of the order of the director, within 10 days after affirmance of the order, the
16 owner or operator shall commence in good faith the work ordered and continue it until
17 completion. If the work has not been commenced and continued to completion, the
18 supervisor may appoint necessary agents to enter the premises and perform the work. An
19 accurate account of the expenditures shall be kept. Any amount so expended shall constitute
20 a lien against real or personal property of the operator pursuant to the provisions of Section
21 3423. Before performing such work, the division may impose a lien against the real or personal
22 property of the operator pursuant to Section 3423 in an amount equal to an estimate of the
23 cost of the work based on a bid from a contractor or previous costs to perform comparable
24 work.”

25 **PRC section 3236.5** authorizes the Supervisor to impose a civil penalty on a person who
26 violates any statutory provision in Chapter 1 of Division 3 of the PRC (PRC sections 3000 through
27 3473), or any regulation that implements those statutory provisions. Subject to the Supervisor’s
28 discretion, the penalty amount may be up to \$25,000 per violation, per day.

1 **PRC section 3270** mandates that CalGEM prescribe by regulation minimum facility
2 maintenance standards for all production facilities in the state.

3 **Regulations section, subdivision 1722, (a)** provides all operations shall be conducted in
4 accordance with good oilfield practice.

5 **Regulations section, subdivision 1722.1.1, (a)** provides that each well shall have posted
6 in a conspicuous place a clearly visible, legible, permanently affixed sign with the name of the
7 operator, name or number of the lease, and number of the well. These signs shall be
8 maintained on the premises from the time drilling operations cease until the well is plugged
9 and abandoned.

10 **Regulations section 1765.1, subdivision (b)** defines a "health protection zone" as the
11 area within 3,200 feet of a sensitive receptor.

12 **Regulations section 1765.1, subdivision (c)** provides a "sensitive receptor" means any of
13 the following:

14 (1) A residence, including a private home, condominium, apartment, and living
15 quarter.

16 (2) An education resource, including a preschool, school maintaining transitional
17 kindergarten, kindergarten, or any of grades 1 to 12, inclusive, daycare center, park,
18 playground, university, and college. Where a university or college is the only sensitive receptor
19 within 3,200 feet of the operator's wellheads or production facilities, the university or college is
20 not a sensitive receptor if the operator demonstrates to the Division's satisfaction that no
21 building with nominal daily occupancy on the university or college campus is located within
22 3,200 feet of the operator's wellheads or production facilities.

23 (3) A community resource center, including a youth center.

24 (4) A health care facility, including a hospital, retirement home, and nursing home.

25 (5) Live-in housing, including a long-term care hospital, hospice, prison, detention
26 center, and dormitory.

27 (6) Any building housing a business that is open to the public.

1 **Regulations section 1774.1, subdivision (f)** provides that “The operator shall perform
2 periodic mechanical integrity testing on all active environmentally sensitive pipelines that are
3 gathering lines, and all urban pipelines over 4” in diameter, and all active gas pipelines in
4 sensitive areas. The mechanical integrity testing shall be conducted every two years, or at an
5 alternative frequency approved by the Supervisor based on demonstrated wall thickness and
6 remaining service life over a period of at least two years. The testing frequencies shall be
7 specified in the operator’s Pipeline Management Plan...”

8 **Regulations section 1775, subdivision (a)** provides that oilfield wastes, including but not
9 limited to oil, water, chemicals, mud, and cement, shall be disposed of in such a manner as
10 not to cause damage to life, health, property, freshwater aquifers or surface waters, or natural
11 resources, or be a menace to public safety. Disposal sites for oilfield wastes shall also conform
12 to State Water Resources Control Board and appropriate California Regional Water Quality
13 Control Board regulations.

14 **Regulations section 1777, subdivision (a)** provides that operators shall maintain
15 production facilities in good condition and in a manner to prevent leakage or corrosion and
16 to safeguard life, health, property, and natural resources.

17 **Regulations section 1777, subdivision (c)(3)** requires that well cellars are covered and
18 kept drained.

Attachment C
(Notice of Violation, 1.21.2025)

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NOTICE OF VIOLATION

January 21, 2025

WellSTAR Compliance ID: 12405782

VIA WELLSTAR AND E-MAIL

Danniella Kelleher
ellan@westenergyoperating.com
West Energy Operating, LLC
2300 Alessandro Drive Suite 210
Ventura, CA, 93001

Dear Danniella Kelleher:

RE: FAILURE TO PERFORM PIPELINE MECHANICAL INTEGRITY TESTING, WEST ENERGY OPERATING, LLC, CANFIELD RANCH FIELD(S)

On August 28, 2024, the California Geologic Energy Management Division (CalGEM) sent an email to West Energy Operating, LLC requesting submittal of pipeline test data for the pipelines listed in the table below. CalGEM has not received the requested pipeline mechanical integrity data. The pipelines operated by West Energy Operating, LLC at Canfield Ranch field are past due for mechanical integrity testing.

CCR section 1774.1 (f) states, in part, that “[t]he operator shall perform periodic mechanical integrity testing on all active environmentally sensitive pipelines that are gathering lines, and all urban pipelines over 4” in diameter, and all active gas pipelines in sensitive areas. The mechanical integrity testing shall be conducted every two years, or at an alternative frequency approved by the Supervisor based on demonstrated wall thickness and remaining service life over a period of at least two years.”

CCR section 1774.1 (i) states, “[f]or pipelines that are subject to mechanical integrity testing under subdivision (f), but that were not subject to mechanical integrity testing under subdivision (f) prior to January 1, 2018, mechanical integrity testing is not required to be completed until January 2, 2020. For these pipelines, mechanical integrity testing shall be scheduled, completed, and mechanical integrity test results documented per subdivision (f) prior to January 2, 2020.”

ComponentID	ComponentName	TestDueDate
18471	Edgar 51X-24	1/27/2024
18482	Hall-Edgar 71-24	1/27/2024
18487	Hall-Edgar 82-24	1/25/2024
18483	Hall-Edgar 72-24	1/27/2024
18469	Edgar 44X-24	1/25/2024

West Energy Operating, LLC

January 21, 2025

Page 2 of 2

ComponentID	ComponentName	TestDueDate
18470	Edgar 41-24	1/25/2024
18472	Edgar 41X-24	1/25/2024
18486	Hall-Edgar 73-24	1/27/2024
18473	Edgar 52-24	1/25/2024
18489	KCL 2 56-23	1/25/2024
18488	KCL 2 47-23	1/25/2024
18495	KCL Gosf A 17-13	1/25/2024
18493	KCL 2 67X-23	1/25/2024
18475	Gosford 174-23	1/28/2024
18503	KCL Gos A 48X-13	1/27/2024
21466	Gos 4 33X-13 Gas	2/27/2024
18474	Gosford 171-23	1/28/2024

West Energy Operating, LLC is requested to provide CalGEM the pipeline mechanical integrity data that meets the requirements of CCR section 1774.1 by February 4, 2025. Please submit the required data by emailing

CalGEMCentralEnvironmental@conservation.ca.gov, attention [11109: West Energy Operating, LLC, Compliance ID: 12405782], or by submitting an "Upload Test Results" form in WellSTAR for each pipeline.

If the pipelines failed the mechanical integrity testing, the lines must be repaired and re-tested, or removed from service immediately. CalGEM must be notified of the failed test immediately upon discovery.

Violations of CalGEM statutes and regulations may result in enforcement action including, but not limited to, administrative, civil or criminal action pursuant to Public Resources Code sections 3224, 3236, 3236.2, and/or 3236.5.

If you have any questions, please contact Victor Medrano at (661) 201-8607 or Victor.Medrano@conservation.ca.gov.

Sincerely,

David Cooley-Gam

David Cooley-Gam
Senior Oil and Gas Engineer
Central District, Field Engineering Unit

Attachment D
(Inspection Summary, 5.1.2025)

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California
Department of Conservation
Geologic Energy Management Division

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Jennifer Lucchesi, Director

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Inspection Summary

Inspection Information					
Inspection ID	Inspection Type	Inspection Date	Inspection Name	Follow-Up Date	
12419133	Re-Inspection	5/1/2025	Alexandria Garcia		
Compliance Summary					
New Violation(s)		Resolved Violation(s)		Unresolved Violation(s)	
4		2		4	
Operator Information					
Operator Code		Operator Name			
11109		West Energy Operating, LLC			
Agent Name		Danniella Kelleher			
Agent Address		351 Dayloma Avenue			
City	Ventura	State	CA	Zip Code	93003
Inspected Subject(s)					
See list of Inspected Subjects on subsequent page.					
Inspection Document(s)					
See list of Inspection Documents on subsequent page.					
New Violation(s)					
Notice of Violation According to the records maintained by the California Geologic Energy Management Division, West Energy Operating, LLC has been found in violation of the regulation section(s) listed in this table. Failure to correct a violation may result in enforcement action, including, but not limited to, issuance of a civil penalty or a remedial work order pursuant to Public Resources Code § 3236.5 and/or § 3224.					
Compliance ID:		12419134			
See list of Violations on subsequent page.					
Resolved Violation(s)					
Notice of Violation(s) Corrected According to the records maintained by the California Geologic Energy Management Division(CalGEM), West Energy Operating, LLC has been found to have corrected the violation(s) listed below in this table. Correction of the listed violations does not preclude CalGEM from taking enforcement action including, but not limited to issuance of a civil penalty pursuant to Public Resource Code § 3236.5.					
See list of Resolved Violations on subsequent page.					
Unresolved Violation(s)					

Notice of Unresolved Violation(s)

According to the records maintained by the California Geologic Energy Management Division (CalGEM), West Energy Operating, LLC has been found to have not corrected the violation(s) listed below in this table. Failure to correct a violation may result in enforcement action, including, but not limited to, issuance of a civil penalty or a remedial work order pursuant to Public Resources Code § 3236.5 and/or § 3224.

See list of Unresolved Violations on subsequent page.



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Jennifer Lucchesi, Director

715 P Street, MS 1803
Sacramento, CA. 95814
T: (916) 445-5986

Inspected Subject(s)					
Field	Lease	Subject ID	Subject Name	Subject Type	Form Name
Bellevue	Houghton	0402904226	Houghton 36-35	Well	Environmental Well Site Inspection
Bellevue	Houghton	0402904230	Houghton 58-35	Well	Environmental Well Site Inspection
Bellevue	Houghton	0402942840	Houghton 46X-35	Well	Environmental Well Site Inspection
Bellevue	Houghton	0402904224	Houghton 28-35	Well	Environmental Well Site Inspection



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Inspection Document(s)					
Subject Type	Subject ID	Type	Description	Filename	Document ID
Well	0402904230	Photo	ENV Reinspect_05-01- 2025	402904230_Hough ton 58-35_ENV Reinspect_05-01- 2025.zip	1241555
Well	0402942840	Photo	ENV Reinspect_05-01- 2025	402942840_Hough ton 46X-35_ENV Reinspect_05-01- 2025.zip	1241556
Well	0402904226	Photo	ENV Reinspect_05-01- 2025	402904226_Hough ton 36-35_ENV Reinspect_05-01- 2025.zip	1241557
Well	0402904224	Photo	ENV Reinspect_05-01- 2025	402904224_Hough ton 28-35_ENV Reinspect_05-01- 2025.zip	1241558



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New Violation(s)

Notice Of Violation

According to the records maintained by the California Geologic Energy Management Division, West Energy Operating, LLC has been found in violation of the regulation section(s) listed in this table. Failure to correct a violation may result in enforcement action, including, but not limited to, issuance of a civil penalty or a remedial work order pursuant to Public Resources Code § 3236.5 and/or § 3224.

Compliance ID:

12419134

Violation ID	Section	Code Type	Subject Name	Subject ID	Remedy Due Date
12419138	1722(a) - General	California Code of Regulations - Title 14	Houghton 46X-35	0402942840	5/31/2025
Comment		Weeds within 5-10ft of the wellhead/pumping unit should be removed to reduce the risk of fire. Some of the weeds have been contaminated by oily fluids from the cellar along the East and North sides of the pumping unit and should be removed.			
Corrective Actions:		Bring into compliance.			
Violation ID	Section	Code Type	Subject Name	Subject ID	Remedy Due Date
12419137	1775(a) - Oilfield Wastes and Refuse	California Code of Regulations - Title 14	Houghton 46X-35	0402942840	5/31/2025
Comment		Oilfield waste has not been removed and disposed of properly. It appears that oily fluids from the cellar overflowed at some point, contaminating the ground around the cellar and flowing away to the East and North. Some oily fluid has also soaked into the soil directly behind the pumping unit. The Operator Rep stated he has a bulldozer available to remove the waste and will send timestamp photos upon completion.			
Corrective Actions:		Bring into compliance.			
Violation ID	Section	Code Type	Subject Name	Subject ID	Remedy Due Date
12419135	1777(c)(3) - Maintenance and Monitoring of Production Facilities, Safety Systems, and Equipment	California Code of Regulations - Title 14	Houghton 36-35	0402904226	5/31/2025
Comment		The cellar contains oily fluids and is nearly full. The Operator's Rep will be scheduling a vac truck shortly and will send timestamp photos when complete.			
Corrective Actions:		Bring into compliance.			

Violation ID	Section	Code Type	Subject Name	Subject ID	Remedy Due Date
12419136	1777(c)(3) - Maintenance and Monitoring of Production Facilities, Safety Systems, and Equipment	California Code of Regulations - Title 14	Houghton 46X-35	0402942840	5/31/2025
Comment		The cellar contains oily fluids and is nearly full. The Operator's Rep will be scheduling a vac truck shortly and will send timestamp photos when complete.			
Corrective Actions:		Bring into compliance.			



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Resolved Violation(s)

Notice of Violation(s) Corrected

According to the records maintained by the California Geologic Energy Management Division(CalGEM), West Energy Operating, LLC has been found to have corrected the violation(s) listed below in this table. Correction of the listed violations does not preclude CalGEM from taking enforcement action including, but not limited to issuance of a civil penalty pursuant to Public Resource Code § 3236.5.

Compliance ID:		12362936			
Violation ID	Section	Code Type	Subject ID	Subject Name	Resolved Date
12362937	1722(a) - General	California Code of Regulations - Title 14	0402904230	Houghton 58-35	5/1/2025
Compliance ID:		12362940			
Violation ID	Section	Code Type	Subject ID	Subject Name	Resolved Date
12362941	1722(a) - General	California Code of Regulations - Title 14	0402904224	Houghton 28-35	5/1/2025



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Unresolved Violation(s)

Notice of Unresolved Violation(s)

According to the records maintained by the California Geologic Energy Management Division (CalGEM), West Energy Operating, LLC has been found to have not corrected the violation(s) listed below in this table. Failure to correct a violation may result in enforcement action, including, but not limited to, issuance of a civil penalty or a remedial work order pursuant to Public Resources Code § 3236.5 and/or § 3224.

Compliance ID:	12320045			
Violation ID	Section	Code Type	Subject Name	Subject ID
12320047	1722.1.1(a) - Well and Operator Identification	California Code of Regulations - Title 14	Houghton 58-35	0402904230
12320050	1722.1.1(a) - Well and Operator Identification	California Code of Regulations - Title 14	Houghton 36-35	0402904226
Compliance ID:	12362938			
Violation ID	Section	Code Type	Subject Name	Subject ID
12362939	1722(a) - General	California Code of Regulations - Title 14	Houghton 46X-35	0402942840
Compliance ID:	12362940			
Violation ID	Section	Code Type	Subject Name	Subject ID
12362942	1777(c)(3) - Maintenance and Monitoring of Production Facilities, Safety Systems, and Equipment	California Code of Regulations - Title 14	Houghton 28-35	0402904224

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Attachment E
(Inspection Summary, 9.15.2025)



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Jennifer Lucchesi, Director

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Inspection Summary

Inspection Information					
Inspection ID	Inspection Type	Inspection Date	Inspection Name	Follow-Up Date	
12434781	Environmental Lease Inspection	9/15/2025	Marco Ceja		
Compliance Summary					
New Violation(s)		Resolved Violation(s)		Unresolved Violation(s)	
5		0		0	
Operator Information					
Operator Code		Operator Name			
11109		West Energy Operating, LLC			
Agent Name		Danniella Kelleher			
Agent Address		351 Dayloma Avenue			
City	Ventura	State	CA	Zip Code	93003
Inspected Subject(s)					
See list of Inspected Subjects on subsequent page.					
Inspection Document(s)					
See list of Inspection Documents on subsequent page.					
New Violation(s)					
Notice of Violation According to the records maintained by the California Geologic Energy Management Division, West Energy Operating, LLC has been found in violation of the regulation section(s) listed in this table. Failure to correct a violation may result in enforcement action, including, but not limited to, issuance of a civil penalty or a remedial work order pursuant to Public Resources Code § 3236.5 and/or § 3224.					
Compliance ID:		12434782			
See list of Violations on subsequent page.					



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Inspected Subject(s)					
Field	Lease	Subject ID	Subject Name	Subject Type	Form Name
Canfield Ranch	Hall-Edgar	90324080	Hall-Edgar	Lease	Environmental Miscellaneous Lease Inspection
Canfield Ranch	Hall-Edgar	0403040856	Hall-Edgar 71-24	Well	Gas Leak Detection
Canfield Ranch	Hall-Edgar	0403040856	Hall-Edgar 71-24	Well	Environmental Well Site Inspection
Canfield Ranch	Hall-Edgar	0403048254	Hall-Edgar 73-24	Well	Gas Leak Detection
Canfield Ranch	Hall-Edgar	0403020995	Hall-Edgar 82-24	Well	Environmental Well Site Inspection
Canfield Ranch	Hall-Edgar	0403048254	Hall-Edgar 73-24	Well	Environmental Well Site Inspection
Canfield Ranch	Hall-Edgar	0402900337	Hall-Edgar 61-24	Well	Environmental Well Site Inspection
Canfield Ranch	Hall-Edgar	0402904476	Hall-Edgar 72-24	Well	Environmental Well Site Inspection
Canfield Ranch	Hall-Edgar	0403020995	Hall-Edgar 82-24	Well	Gas Leak Detection
Canfield Ranch	Hall-Edgar	0402904476	Hall-Edgar 72-24	Well	Gas Leak Detection



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Inspection Document(s)					
Subject Type	Subject ID	Type	Description	Filename	Document ID
Well	0403040856	Photo	0403040856_Hall-Edgar 71-24_09-15-2025_InspectionPhotos	0403040856_Hall-Edgar 71-24_09-15-2025_InspectionPhotos.pdf	1328848
Well	0402900337	Photo	0402900337_Hall-Edgar 61-24_09-15-2025_InspectionPhoto	0402900337_Hall-Edgar 61-24_09-15-2025_InspectionPhotos.pdf	1328849
Well	0403048254	Photo	0403048254_Hall-Edgar 73-24_09-15-2025_InspectionPhotos	0403048254_Hall-Edgar 73-24_09-15-2025_InspectionPhotos.pdf	1328850
Well	0402904476	Photo	0402904476_Hall-Edgar 72-24_09-15-2025_InspectionPhotos	0402904476_Hall-Edgar 72-24_09-15-2025_InspectionPhotos.pdf	1328851
Well	0403020995	Photo	0403020995_Hall-Edgar 82-24_09-15-2025_InspectionPhotos	0403020995_Hall-Edgar 82-24_09-15-2025_InspectionPhotos.pdf	1328852



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New Violation(s)

Notice Of Violation

According to the records maintained by the California Geologic Energy Management Division, West Energy Operating, LLC has been found in violation of the regulation section(s) listed in this table. Failure to correct a violation may result in enforcement action, including, but not limited to, issuance of a civil penalty or a remedial work order pursuant to Public Resources Code § 3236.5 and/or § 3224.

Compliance ID:

12434782

Violation ID	Section	Code Type	Subject Name	Subject ID	Remedy Due Date
12434787	1775(a) - Oilfield Wastes and Refuse	California Code of Regulations - Title 14	Hall-Edgar 72-24	0402904476	10/16/2025
Comment		Oilfield wastes have not been properly disposed of.			
Corrective Actions:		Bring into compliance.			
Violation ID	Section	Code Type	Subject Name	Subject ID	Remedy Due Date
12434783	1775(c) - Oilfield Wastes and Refuse	California Code of Regulations - Title 14	Hall-Edgar 73-24	0403048254	10/16/2025
Comment		Oilfield refuse was observed.			
Corrective Actions:		Bring into Compliance.			
Violation ID	Section	Code Type	Subject Name	Subject ID	Remedy Due Date
12434785	1775(c) - Oilfield Wastes and Refuse	California Code of Regulations - Title 14	Hall-Edgar 82-24	0403020995	10/16/2025
Comment		Oilfield refuse was observed.			
Corrective Actions:		Bring into compliance.			
Violation ID	Section	Code Type	Subject Name	Subject ID	Remedy Due Date
12434784	1777(c)(3) - Maintenance and Monitoring of Production Facilities, Safety Systems, and Equipment	California Code of Regulations - Title 14	Hall-Edgar 82-24	0403020995	10/16/2025
Comment		The cellar is not properly covered.			

Corrective Actions:		Bring into compliance.			
Violation ID	Section	Code Type	Subject Name	Subject ID	Remedy Due Date
12434786	1777(c)(3) - Maintenance and Monitoring of Production Facilities, Safety Systems, and Equipment	California Code of Regulations - Title 14	Hall-Edgar 82-24	0403020995	10/16/2025
Comment		The cellar contains fluid.			
Corrective Actions:		Bring into compliance.			

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Attachment F
(Inspection Summary, 11.4.2025)



California
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Gavin Newsom, Governor
Jennifer Lucchesi, Director

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Inspection Summary

Inspection Information					
Inspection ID	Inspection Type	Inspection Date	Inspection Name	Follow-Up Date	
12441873	Environmental Lease Inspection	11/4/2025	Jose Gonzalez Ortiz		
Compliance Summary					
New Violation(s)		Resolved Violation(s)		Unresolved Violation(s)	
5		0		0	
Operator Information					
Operator Code		Operator Name			
11109		West Energy Operating, LLC			
Agent Name		Danniella Kelleher			
Agent Address		351 Dayloma Avenue			
City	Ventura	State	CA	Zip Code	93003
Inspected Subject(s)					
See list of Inspected Subjects on subsequent page.					
Inspection Document(s)					
No documents were uploaded during this inspection.					
New Violation(s)					
Notice of Violation According to the records maintained by the California Geologic Energy Management Division, West Energy Operating, LLC has been found in violation of the regulation section(s) listed in this table. Failure to correct a violation may result in enforcement action, including, but not limited to, issuance of a civil penalty or a remedial work order pursuant to Public Resources Code § 3236.5 and/or § 3224.					
Compliance ID:		12441874			
See list of Violations on subsequent page.					



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Jennifer Lucchesi, Director

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Inspected Subject(s)					
Field	Lease	Subject ID	Subject Name	Subject Type	Form Name
Canfield Ranch	Waterbank Fee	90324086	Waterbank Fee	Lease	Environmental Miscellaneous Lease Inspection
Canfield Ranch	Waterbank Fee	0403007350	Waterbank Fee 36X-14	Well	Environmental Well Site Inspection
Canfield Ranch	Waterbank Fee	0403007350	Waterbank Fee 36X-14	Well	Miscellaneous Inspection Form



California
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New Violation(s)

Notice Of Violation

According to the records maintained by the California Geologic Energy Management Division, West Energy Operating, LLC has been found in violation of the regulation section(s) listed in this table. Failure to correct a violation may result in enforcement action, including, but not limited to, issuance of a civil penalty or a remedial work order pursuant to Public Resources Code § 3236.5 and/or § 3224.

Compliance ID:

12441874

Violation ID	Section	Code Type	Subject Name	Subject ID	Remedy Due Date
12441875	1722.1.1(a) - Well and Operator Identification	California Code of Regulations - Title 14	Waterbank Fee 36X-14	0403007350	12/5/2025
Comment		Waterbank Fee 36X-14: Missing well sign			
Corrective Actions:		Bring into compliance			
Violation ID	Section	Code Type	Subject Name	Subject ID	Remedy Due Date
12441878	1775(a) - Oilfield Wastes and Refuse	California Code of Regulations - Title 14	Waterbank Fee 36X-14	0403007350	12/5/2025
Comment		Waterbank Fee 36X-14: Oil field refuse present			
Corrective Actions:		Bring into compliance			
Violation ID	Section	Code Type	Subject Name	Subject ID	Remedy Due Date
12441879	1777(a) - Maintenance and Monitoring of Production Facilities, Safety Systems, and Equipment	California Code of Regulations - Title 14	Waterbank Fee 36X-14	0403007350	12/5/2025
Comment		Waterbank Fee 36X-14: Open ended pipeline missing bull plugs/valve is open			
Corrective Actions:		Bring into compliance			
Violation ID	Section	Code Type	Subject Name	Subject ID	Remedy Due Date
12441876	1777(c)(3) - Maintenance and Monitoring of Production	California Code of Regulations - Title 14	Waterbank Fee 36X-14	0403007350	12/5/2025

	Facilities, Safety Systems, and Equipment				
Comment		Waterbank Fee 36X-14: Cellar inadequately covered			
Corrective Actions:		Bring into compliance			
Violation ID	Section	Code Type	Subject Name	Subject ID	Remedy Due Date
12441877	1777(c)(3) - Maintenance and Monitoring of Production Facilities, Safety Systems, and Equipment	California Code of Regulations - Title 14	Waterbank Fee 36X-14	0403007350	12/5/2025
Comment		Waterbank Fee 36X-14: Cellar not free of fluids			
Corrective Actions:		Bring into compliance			

**NOTICE OF APPEAL TO THE
DIRECTOR OF THE DEPARTMENT OF CONSERVATION**

Use of this form is optional. You may use this form to prepare a Notice of Appeal from the enclosed Order. The style and content of this form are only suggestions. You may file a written notice of appeal in a different format.

Mail the completed form to the address at the bottom of this page.

Box 1: Statement of Intent to Appeal

(Review the text in this box to confirm that the operator information Order No. 1661 are accurate. Make any necessary corrections directly on the form.)

Operator, West Energy Operating LLC, hereby appeals from State Oil and Gas Supervisor Order No. 1661

Box 2: Basis of Appeal

(Explain the reasons why you are appealing the order. Make your explanation as clear and complete as you can. If you need more space to write your explanation, attach additional pages. Label any attached additional pages with "Notice of Appeal re: Order No.1661")

The reasons for this appeal are as follows:

☐ (Attach additional pages as necessary.)

Box 3: Contact Information for Operator Representative

(Provide contact information for the preferred operator representative with whom the Appeals Officer and Supervisor's legal counsel may communicate regarding the appeal.)

Name: _____

Physical Mail:

(Address) _____

(City, State, Zip) _____

Phone: (_____) _____ - _____

Email: _____

☐ I agree to document service using the email address above.

Box 4: Certification of Authority

Mail or E-mail this Notice of Appeal to the following the following address, as appropriate:

Department of Conservation, Director's Office of Appeals
715 P Street, MS 1906 (Legal Office, Chief Counsel)
Sacramento, CA 95814-3530
OfficeofAppeals@conservation.ca.gov

rev. 10/2/2024

(Verify that all information on or attached to the form is correct, then sign and date the certification where indicated.)

I am the operator named in Box 1, above, or I have authority to act on behalf of that operator for purposes of preparing and filing this Notice of Appeal.

Signature: _____

Date: _____

Printed Name: _____

Affiliation with operator: _____

(e.g., self, owner, president, legal counsel, etc.)

Mail or E-mail this Notice of Appeal to the following the following address, as appropriate:

Department of Conservation, Director's Office of Appeals
715 P Street, MS 1906 (Legal Office, Chief Counsel)
Sacramento, CA 95814-3530
OfficeofAppeals@conservation.ca.gov

rev. 10/2/2024

PROOF OF SERVICE BY CERTIFIED U.S. MAIL

I declare that I am employed in the County of Sacramento, California. I am over the age of 18 and not a party to the within captioned cause. My business address is 715 P Street, MS 1803, Sacramento, California 95814. On July 23, 2026 I served the following document(s):

**ORDER TO PAY A CIVIL PENALTY AND PERFORM REMEDIAL WORK
NO. 1661**

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 below listed address(es) 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 mailing service in a sealed envelope with postage fully prepaid.

This mailing was sent to the operator's updated address of record, which was provided by the operator's agent on July 23, 2026.

I served the documents on the person or persons below, as follows:

William Kelleher c/o West Energy Operating 351 Dayloma Ave. Ventura, CA. 93001	West Energy Operating 1201 North Catalina Ave., #577 Redondo Beach, CA. 90277
Certified Mail Number: 9589 0710 5270 3983 2585 40	Certified Mail Number: 9589 0710 5270 3983 2585 33

I declare under penalty of perjury of the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on July 23, 2026 at Sacramento, CA.

Shannon Kiely
Shannon Kiely