

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 CIVIL PENALTIES
NO. 1669

Operator: CalNRG Operating, LLC (E0455)

Field Name: Richfield

County: Orange

District: Southern

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, CalNRG Operating, LLC (**Operator**) is the "operator" (as defined in PRC, § 3009) and is responsible for the Well and associated Production Facilities identified on **Attachment A**, incorporated herein (the "**Well**" and "**Facilities**"). As described in more detail below, Operator has not maintained compliance with applicable requirements for operation of the Well and the Facilities. Operator's failure to comply with the Regulations poses a potential threat to life, health, property, and natural resources for which the Supervisor has determined imposition of a civil penalty is appropriate. Therefore, pursuant to PRC sections 3013, 3106, 3225, 3236.5, and 3270 and Regulations sections 1775 and 1777, the Supervisor is ordering Operator to 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 Well and Facilities. On or about March 3, 2026, CalGEM conducted an inspection of the Well and Facilities where the violations described below were observed and documented in the Richfield Field. (**Attachment C**, incorporated herein.)

These violations reflect Operator has not maintained compliance with applicable requirements for operation of the Well and the Facilities. Operator's lack of adherence to the Regulations poses a potential threat to life, health, property, and natural resources.

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

Operators are required to dispose of oilfield wastes, including but not limited to oil, water, chemicals, mud, and cement, and 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 crude oil in open buckets and open plastic containers and oilfield waste that had not been properly disposed of, in violation of Regulations, sections 1775, subdivision (a), at the following well and production facilities:

API	Well Designation
0405906497	Yarnell (nct-1) 29

Facility Setting ID	Facility Setting Name	District	Facility (Component) ID	Facility (Component) Name	Facility (Component) Type
90295483	Richfield Consolidated Tank Farm	Southern	N/A	N/A	Setting
90295483	Richfield Consolidated Tank Farm	Southern	14072	T1 Produce Water (Injection Water T-001)	Tank

The three violations were remediated by Operator on or around March 3, 2026, and March 10, 2026.

B. Failure to maintain production facilities in good condition and in a manner to prevent leakage or corrosion. (Regulations, § 1777, 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, §

1777, subd. (a).) Production facilities include wellheads. (PRC, § 3010; Regulations, § 1760, subd. (r).)

During the inspection, CalGEM observed a liquid leak at the following wellhead, and the well therefore not being maintained in a good condition and in a manner to prevent leakage or corrosion, in violation of the Regulations, section 1777, subdivision (a):

API	Well Designation
0405906497	Yarnell (nct-1) 29

The one violation was remediated by Operator on or around March 3, 2026.

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 one thousand two hundred fifty dollars (\$1,250.00) for the four violations.

Violation Description	Number of Violations	Associated Civil Penalty per Violation	Civil Penalties Totals
Failure to Remove Oilfield Waste and Refuse in Urban Area (Regulations, § 1775, subd. (a)) Facility ID 90295483 Facility ID 14072 API 0405906497	3	\$250.00	\$750.00
Failure to Maintain Production Facilities in Good Condition and in a Manner to Prevent Leakage or Corrosion; Leaking Wellhead in Urban Area and Health Protection Zone (Regulations, § 1777, subd. (a).) API 0405906497	1	\$500.00	\$500.00
		Total Civil Penalties:	\$1,250.00

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), the Well and Facilities are located in an urban area, as defined by Regulations section 1760, subdivision (y), the Well is located in a Health Protection Zone as defined by Regulations section 1765.1, subdivision (b), and the mitigating factor of Operator’s timeliness of remediating the violations.

IV. Operator’s Required Actions

For the reasons stated herein, pursuant to PRC sections 3013, 3106, 3225, and 3236.5, and Regulations sections 1775 and 1777, **IT IS HEREBY ORDERED** that within 30 days, Operator pay administrative civil penalties of one thousand two hundred fifty dollars (\$1,250.00);

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 1803
Sacramento, California 95814

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

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

1 receive the appeal within fifteen (15) days from the date the Supervisor mails the Order. To file
2 an appeal, a written notice of appeal may be sent via U.S. mail to:

3 Department of Conservation
4 Director's Office of Appeals
5 715 P Street, MS 19-06 (Legal Office, Chief Counsel)
6 Sacramento, California 95814

7 Or via electronic mail to:

8 OfficeofAppeals@conservation.ca.gov

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

12 If Operator does not file a timely written notice of appeal, or if the Order is affirmed
13 following an appeal, this Order will become a final order. Any costs incurred by CalGEM to
14 obtain compliance with this Order (which may include penalties and interest) will
15 constitute a lien against Operator's real or personal property per PRC section 3423. (PRC, §
16 3356.)

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

18 Failure to comply with Section IV (Operator's Required Actions) of this Order could
19 subject Operator to further enforcement action. PRC section 3236 makes it a misdemeanor for
20 any person who violates, fails, neglects, or refuses to comply with any of the provisions of the
21 oil and gas conservation laws commencing at PRC section 3000. PRC sections 3236.2 and
22 3236.3 authorize the Supervisor to seek for civil penalties and injunctive relief for failure to
23 comply with an order or for violations of any provision in Chapter 1 of Division 3 of the PRC or
24 any regulation that implements those statutes. PRC section 3236.5 authorizes the Supervisor to
25 impose a civil penalty on a person who violates any provision in Chapter 1 of Division 3 of the
26 PRC or any regulation that implements those statutes, and the Supervisor may in the future
27 impose further civil penalties based on the facts and omissions underlying this order. PRC
28 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: 8/12/2026

Doug Ito

Doug Ito
State Oil and Gas Supervisor

Service List

Via certified mail:

CalNRG Operating, LLC
c/o Clifton Simonson
1746-F South Victoria Avenue, 245
Ventura, CA 93003

CalNRG Operating, LLC
c/o Clifton Simonson
63223 Deadmans Gulch Rd.
San Ardo, CA 93450

CalNRG Operating, LLC
1536 Eastman Avenue, Suite C
Ventura, CA 93003

CalNRG Operating, LLC
2815 Townsgate Rd, #320
Westlake Village, CA 91361

Via email:

Clifton Simonson
CalGemAgent@calnrg.com
eagle@eagle-petroleum.com

Attachment A
(Well and Production Facilities)

Operator Name: CalNRG Operating, LLC

Operator Code: E0455

API	Well Designation	Field	District
0405906497	Yarnell (nct-1) 29	Richfield	Southern

Facility Setting ID	Facility Setting Name	Field	District	Facility (Component) ID	Facility (Component) Name	Facility (Component) Type
90295483	Richfield Consolidated Tank Farm	Richfield	Southern	N/A	N/A	Setting
90295483	Richfield Consolidated Tank Farm	Richfield	Southern	14072	T1 Produce Water (Injection Water T-001)	Tank

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 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.

Regulations section 1765.1, subdivision (b), defines “Health Protection Zone” as the area within 3,200 feet of a sensitive receptor.

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

1 from infiltrating water and other causes; loss of oil, gas, or reservoir energy, and damage to
2 underground and surface waters suitable for irrigation or domestic purposes by the infiltration
3 of, or the addition of, detrimental substances.”

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

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

21 **PRC section 3226, subdivision (a)**, provides that “within 30 days after service of an order
22 pursuant to Sections 3224 and 3225, or Section 3237, or if there has been an appeal from the
23 order to the director, within 30 days after service of the decision of the director, or if a review
24 has been taken of the order of the director, within 10 days after affirmance of the order, the
25 owner or operator shall commence in good faith the work ordered and continue it until
26 completion. If the work has not been commenced and continued to completion, the
27 supervisor may appoint necessary agents to enter the premises and perform the work. An
28 accurate account of the expenditures shall be kept. Any amount so expended shall constitute

1 a lien against real or personal property of the operator pursuant to the provisions of Section
2 3423. Before performing such work, the division may impose a lien against the real or personal
3 property of the operator pursuant to Section 3423 in an amount equal to an estimate of the
4 cost of the work based on a bid from a contractor or previous costs to perform comparable
5 work.”

6 **PRC section 3236.5** authorizes the Supervisor to impose a civil penalty on a person who
7 violates any statutory provision in Chapter 1 of Division 3 of the PRC (PRC sections 3000 through
8 3473), or any regulation that implements those statutory provisions. Subject to the Supervisor’s
9 discretion, the penalty amount may be up to \$25,000 per violation, per day.

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

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

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

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Attachment C
Inspection Summary 12456493



California
Department of Conservation
Geologic Energy Management Division

Gavin Newsom, Governor
Jennifer Lucchesi, Director

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

Inspection Summary

Inspection Information					
Inspection ID	Inspection Type	Inspection Date	Inspection Name	Follow-Up Date	
12456493	Environmental Lease Inspection	3/3/2026	Bilma Kaufman		
Compliance Summary					
New Violation(s)		Resolved Violation(s)		Unresolved Violation(s)	
5		0		0	
Operator Information					
Operator Code		Operator Name			
E0455		CalNRG Operating, LLC			
Agent Name		Clifton Simonson			
Agent Address		1746-F South Victoria Avenue #245			
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, CalNRG Operating, LLC has been found in violation of the regulation section(s) listed in this table. 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.					
Compliance ID:		12456494			
See list of Violations on subsequent page.					



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Inspected Subject(s)					
Field	Lease	Subject ID	Subject Name	Subject Type	Form Name
Richfield	WRKZU-Union-Hartwell	0405906417	WRKZU-Union-Hartwell 4	Well	UIC Well Inspection
Olive	Dowling	0405905871	Dowling 3	Well	Environmental Well Site Inspection
Olive	Dowling	0405905869	Dowling 1	Well	Environmental Well Site Inspection
Richfield	WRKZU-Union-Hartwell	0405906415	WRKZU-Union-Hartwell 2	Well	Environmental Well Site Inspection
Olive	Dowling	0405905870	Dowling 2	Well	Environmental Well Site Inspection
Olive	Dowling	0405905872	Dowling 4	Well	Environmental Well Site Inspection
Richfield	Yarnell (nct-1)	0405906497	Yarnell (nct-1) 29	Well	Environmental Well Site Inspection
Richfield	WRKZU-Union-Hartwell	0405906416	WRKZU-Union-Hartwell 3	Well	UIC Well Inspection
Olive	Dowling	90295393	Dowling Site B Tank Farm (Frontera-Main Farm)	Setting	Environmental Facility Inspection
Olive	Dowling	90295392	Dowling Site A Tank Farm	Setting	Environmental Facility Inspection
Richfield	Yarnell (nct-1)	90295483	Richfield Consolidated Tank Farm	Setting	Environmental Facility Inspection
Richfield	Yarnell (nct-1)	14075	T4 Wash Tank (North Wash Tank T-004)	Tank	Environmental Facility Inspection
Richfield	Yarnell (nct-1)	23275	T17 Lube Oil	Tank	Environmental Facility Inspection
Richfield	Yarnell (nct-1)	14076	T5 Oily Wastewater (Sand Draw Tank T-005)	Tank	Environmental Facility Inspection
Olive	Dowling	14064	1890	Tank	Environmental Facility Inspection
Olive	Dowling	14070	Wastewater tank	Tank	Environmental Facility Inspection
Olive	Dowling	14065	1889	Tank	Environmental Facility Inspection
Olive	Dowling	23363	OOS West Gas	Vessel	Environmental

			Scrubber		Facility Inspection
Olive	Dowling	14069	T-1604 crude oil	Tank	Environmental Facility Inspection
Richfield	Yarnell (nct-1)	23268	V1 FWKO	Vessel	Environmental Facility Inspection
Olive	Dowling	23370	V7	Vessel	Environmental Facility Inspection
Richfield	Yarnell (nct-1)	14079	T8 Surge Tank (Skim Tank T-008)	Tank	Environmental Facility Inspection
Richfield	Yarnell (nct-1)	14077	T6 Stock Tank (T-006)	Tank	Environmental Facility Inspection
Richfield	Yarnell (nct-1)	14078	T7 Stock Tank (T-007)	Tank	Environmental Facility Inspection
Richfield	Yarnell (nct-1)	23271	Intake Scrubber	Vessel	Environmental Facility Inspection
Richfield	Yarnell (nct-1)	23270	V10 Scrubber	Vessel	Environmental Facility Inspection
Olive	Dowling	14068	T-1606 crude oil	Tank	Environmental Facility Inspection
Olive	Dowling	14208	Wash Tank	Tank	Environmental Facility Inspection
Olive	Dowling	23367	V6	Vessel	Environmental Facility Inspection
Richfield	Yarnell (nct-1)	23267	V6	Vessel	Environmental Facility Inspection
Richfield	Yarnell (nct-1)	23269	Test Separator	Vessel	Environmental Facility Inspection
Olive	Dowling	23366	OOS North Tester	Vessel	Environmental Facility Inspection
Richfield	Yarnell (nct-1)	14072	T1 Produced Water (Injection Water T-001)	Tank	Environmental Facility Inspection
Olive	Dowling	23371	VRU 3	Vessel	Environmental Facility Inspection
Olive	Dowling	28219	Clarifier 1	Tank	Environmental Facility Inspection
Olive	Dowling	14209	T-1600 Crude Oil Tank	Tank	Environmental Facility Inspection
Olive	Dowling	14071	T-1556 Waste Water Tank	Tank	Environmental Facility Inspection
Richfield	Yarnell (nct-1)	14074	T3 Wash Tank (South Wash Tank T-003)	Tank	Environmental Facility Inspection
Olive	Dowling	23369	OOS South Tester	Vessel	Environmental Facility Inspection
Richfield	Yarnell (nct-1)	23280	Yarnell 26 gas scrubber	Vessel	Environmental Facility Inspection

Richfield	Yarnell (nct-1)	23281	V9 Gas Scrubber	Vessel	Environmental Facility Inspection
Richfield	Yarnell (nct-1)	14073	T2 Produced Water (Clarifier T-002)	Tank	Environmental Facility Inspection
Richfield	Yarnell (nct-1)	23274	T18 Lube Oil	Tank	Environmental Facility Inspection
Olive	Dowling	14207	T-1602 Crude Oil Tank	Tank	Environmental Facility Inspection
Olive	Dowling	23364	OOS Gas Scrubber	Vessel	Environmental Facility Inspection
Richfield	Yarnell (nct-1)	23285	Spherical test separator	Vessel	Environmental Facility Inspection
Richfield	Yarnell (nct-1)	23273	V8 Gas Scrubber	Vessel	Environmental Facility Inspection
Olive	Dowling	23365	Water Tank	Tank	Environmental Facility Inspection
Richfield	Yarnell (nct-1)	23266	V5	Vessel	Environmental Facility Inspection
Olive	Dowling	23368	OOS East Gas Scrubber	Vessel	Environmental Facility Inspection
Richfield	Yarnell (nct-1)	23272	V12 Blowcase	Vessel	Environmental Facility Inspection



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New Violation(s)

Notice Of Violation

According to the records maintained by the California Geologic Energy Management Division, CalNRG Operating, LLC has been found in violation of the regulation section(s) listed in this table. 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.

Compliance ID:

12456494

Violation ID	Section	Code Type	Subject Name	Subject ID	Remedy Due Date
12456495	1775(a) - Oilfield Wastes and Refuse	California Code of Regulations - Title 14	Yarnell (nct-1) 29	0405906497	3/3/2026

Comment

Oil field waste and refuse next to the well, open bucket with crude oil catching some of the oil leaking from well. CCR 1775(a). BK 3/3/2026

Corrective Actions:

Bring into compliance.

Violation ID	Section	Code Type	Subject Name	Subject ID	Remedy Due Date
12456496	1777(a) - Maintenance and Monitoring of Production Facilities, Safety Systems, and Equipment	California Code of Regulations - Title 14	Yarnell (nct-1) 29	0405906497	3/3/2026

Comment

Well was leaking crude oil during time of inspection. CCR 1777(a). BK 3/3/2026

Corrective Actions:

Bring into compliance.

Violation ID	Section	Code Type	Subject Name	Subject ID	Remedy Due Date
12456499	1773.3(a) - Tank Maintenance and Inspections	California Code of Regulations - Title 14	Clarifier 1	28219	3/3/2026

Comment

Missing hazard label. CCR 1773.3(a). 3/3/2026 BK

Corrective Actions:

Bring into compliance.

Violation ID	Section	Code Type	Subject Name	Subject ID	Remedy Due Date
12456497	1775(a) - Oilfield Wastes and	California Code of Regulations - Title	T1 Produced Water (Injection Water T-	14072	3/3/2026

	Refuse	14	001)		
Comment	Oil field waste and refuse, open bucket with crude oil next to tank. 1775(a).				
Corrective Actions:	Bring into compliance.				
Violation ID	Section	Code Type	Subject Name	Subject ID	Remedy Due Date
12456498	1775(a) - Oilfield Wastes and Refuse	California Code of Regulations - Title 14	Richfield Consolidated Tank Farm	90295483	3/3/2026
Comment	Oil field waste and refuse inside secondary containment, open rectangular plastic container with crude oil inside of it. CCR 1775(a).				
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. 1669 are accurate. Make any necessary corrections directly on the form.)

Operator, CalNRG Operating, LLC, hereby appeals from State Oil and Gas Supervisor Order No. 1669

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. 1669")

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 August 12, 2026, I served the following document(s):

**ORDER TO PAY CIVIL PENALTIES
NO. 1669**

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 August 12, 2026.

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

CaINRG Operating, LLC c/o Clifton Simonson 1746-F South Victoria Avenue, 245 Ventura, CA 93003 Certified Mail Number: 9589 0710 5270 3983 7900 64	CaINRG Operating, LLC c/o Clifton Simonson 63223 Deadmans Gulch Rd. San Ardo, CA 93450 Certified Mail Number: 9589 0710 5270 3983 7900 71
CaINRG Operating, LLC 1536 Eastman Avenue, Suite C Ventura, CA 93003 Certified Mail Number: 9589 0710 5270 3983 7900 88	CaINRG Operating, LLC 2815 Townsgate Rd, #320 Westlake Village, CA 91361 Certified Mail Number: 9589 0710 5270 3983 7900 95

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 August 12, 2026, at Sacramento, CA.


Ayleen Mehdizadeh