Board Agenda Item

TO: Air Pollution Control District Board
FROM: Aeron Arlin Genet, Air Pollution Control Officer
CONTACT: Kaitlin McNally, Compliance Division Manager, (805) 979-8298
SUBJECT: Status Update on Oil and Gas Operations

RECOMMENDATION:
Receive and file a presentation on the status of oil and gas operations in Santa Barbara County.

BACKGROUND:

On May 24, 2022 the District participated in a Planning and Development (P&D) presentation to the Santa Barbara County Board of Supervisors related to the 2021 Idle Oil Wells in Santa Barbara County Grand Jury report. In response, several Supervisors requested that a regular oil and gas update be brought to the Santa Barbara County Air Pollution Control District Board of Directors at a future date. This is the first oil and gas status update in response to that request. Prior to the 2022 Board of Supervisors presentation, the District also contributed to similar informational updates on February 12, 2019 and December 5, 2017.

DISCUSSION:

The District regulates stationary sources of air pollution within Santa Barbara County, including onshore and offshore oil and gas sources, under the authority of the federal Clean Air Act and the California Health and Safety Code. The District issues permits to oil and gas operators that specify limits on the air pollutants they may emit from the facility, and then performs inspections to ensure operators comply with the specified emission limits. The District permits oil and gas operations including active, idle, and orphan wells; oil and gas plants; an asphalt refinery; oil and gas pump stations; a natural gas storage facility; and natural gas odorant and metering stations. An interactive map, available on the District’s website (https://map.ourair.org/), shows the locations of oil and gas facilities and other air pollution sources permitted by the District.
**Onshore Operations**

Onshore oil and gas operations are generally located in northern Santa Barbara County and concentrated in the Santa Maria Valley, Orcutt Hill, Cat Canyon, Los Alamos, and Cuyama areas. Attachment A provides a map showing the locations of onshore oil wells, as well as state-designated oilfield boundaries in Santa Barbara County. Attachment B includes the status of onshore oil and gas facilities that are undergoing recent/upcoming changes.

There are two significant pipeline systems within Santa Barbara County: the Plains All-American Pipeline and the Phillips 66 Pipeline. Until its rupture and closure in May 2015, the Plains All-American Pipeline (consisting of Line 901 along the Gaviota coast, and Line 903, running from Gaviota to Kern County) provided crude oil transportation for six offshore platforms. The Plains All-American Pipeline was recently sold to Pacific Pipeline Company (an ExxonMobil subsidiary) and remains out of service. The second pipeline system, the Phillips 66 Pipeline (consisting of Line 300 and its associated feeder lines which originate at the Lompoc Oil and Gas Plant and transport oil to the Phillips 66 Santa Maria Refinery in San Luis Obispo County), is also currently idle. This pipeline system carried crude oil from Platform Irene, the Lompoc Field, and other onshore sources to the Phillips 66 Santa Maria Refinery until it closed in January 2023. The District does not have direct regulatory authority over these pipelines, but does regulate the pumps, tanks, fugitive components, emission control systems, diesel generators and other equipment at the associated pump stations and gate valves.

**Offshore Platforms**

There are sixteen offshore oil and gas platforms located in the State Tidelands and Outer Continental Shelf adjacent to Santa Barbara County. The District directly regulates all 16 platforms, based on delegated authority from the United States Environmental Protection Agency (US EPA). Attachment C provides a map showing the location of these offshore platforms and the related onshore facilities, as well as the major pipeline systems. Attachment D includes the status of these 16 platforms. Of note, only five of the 16 platforms are currently operational. Seven platforms are in various stages of being decommissioned. Four platforms are shut-in due to the pipeline closures noted above and are awaiting a method to get oil to the market.

**Inspections**

District inspectors perform inspections of new oil and gas sources after initial operations have commenced, and then conduct routine inspections at each source on a regular basis thereafter. Major oil and gas sources (those that have the potential to emit 100 tons per year or more of any pollutant) are routinely inspected two to four times per year. The remaining small and medium oil and gas sources are routinely inspected once per year, once every two years, or once every three years. The inspection frequency for the small and medium sources is determined by considering District priorities and workload, inspector staffing levels, and the compliance history of the source.

District inspectors use the following equipment when conducting oil and gas inspections:

- FLIR GFX 320 Infrared Camera: Detects the presence of fugitive hydrocarbons (does not quantify).
- Toxic Vapor Analyzer (TVA) 2020: Detects and quantifies fugitive hydrocarbons.
- Jerome J605 Hydrogen Sulfide (H₂S) Analyzer: Measures H₂S in the ambient air.
- Personal H₂S Monitor: Alerts the individual that there is 10 ppm (low level warning) or 15 ppm (high level warning) H₂S in the ambient air.
- H₂S Colorimetric Tube and Pump: Quantifies H₂S in a gas stream.

**Enforcement**

The District issues Notices of Violation (NOV) for failing to comply with permit conditions, and/or local, state, and federal rules and regulations. The primary purpose of a NOV is to initiate corrective action by a stationary source to reduce air pollution and comply with the applicable requirements. To provide an incentive for continuing compliance, NOVs may result in monetary penalties. If an NOV is not immediately rectified, District staff follow up with the source to ensure compliance is achieved.

**Compliance Statistics**

Summaries of the District’s stationary source inspections, the number of NOVs issued, the number of methane leak violations found, and the amount of monetary penalties collected by company are found in Attachment E.

Over the last 4.5 years, the District has seen decreases in oil and gas production in Santa Barbara County, due in part to the 2015 Plains All-American Pipeline rupture, the 2023 Phillips 66 Santa Maria Refinery closure, bankruptcies, and relinquished oil leases. With the associated onshore and offshore oil and gas well plugging and abandoning efforts, the District has already experienced workload decreases: 182 oil and gas inspections were conducted in 2019, which decreased to 154 inspections in 2022 (a 15% decrease). The District anticipates additional workload decreases as these projects are completed; for 2023 we expect to conduct less than 125 oil and gas inspections. The District has also experienced decreased revenue from fees associated with annual emissions, source testing, monitoring, and reimbursable labor collected from the affected oil industry, and we expect to see further declines in the future.

**Efforts to Address Methane Emissions**

Since 1979, the District has enforced Rule 331, Fugitive Emissions Inspection and Maintenance, which regulates fugitive leaks at onshore and offshore oil and gas facilities. In addition, the District also implements the California Air Resources Board (CARB) Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities Regulation (Oil and Gas Methane Regulation), which was adopted in 2017. The Oil and Gas Methane Regulation is designed to reduce methane emissions from oil and gas production, processing, storage, and transmission stations, which account for four percent of methane emissions in California.

On June 22, 2023, the CARB Board adopted amendments to the Oil and Gas Methane Regulation. These amendments better align the regulation with US EPA requirements, make improvements based on implementation experience, and include administrative changes that will make it easier for regulated sources to understand and adhere to the regulation. The significant changes include:

- Additional testing and reporting to verify vapor collection and control system performance.
- Additional inspections of separator and tank systems subject to emission control requirements.
- Development and maintenance of Leak Detection and Repair plans.
- A more rigorous process for obtaining delays of repair.
- Expanded recordkeeping and reporting.
- Remotely detected emission plume inspection and mitigation.

On a statewide level, the California Department of Conservation, Geologic Energy Management Division (CalGEM) and CARB are jointly leading the Methane Task Force, with the goal of identifying and responding to methane leaks from oil infrastructure near communities, as well as addressing the impact methane has on climate change. The Task Force convenes on a regular basis to share updates on statewide efforts aimed at addressing methane leaks from oil and gas infrastructure, and to elevate opportunities for public and local agency engagement. More information is available at: [www.conservation.ca.gov/calgem/Pages/Methane-Task-Force.aspx](http://www.conservation.ca.gov/calgem/Pages/Methane-Task-Force.aspx).

**Orphan Oil and Gas Operations**

CalGEM is currently conducting the permanent closure of approximately 171 orphan oil and gas wells and associated pipelines and production facilities in Santa Barbara County of the 210 wells that were orphaned through the HVI Cat Canyon bankruptcy process. The remaining 39 HVI Cat Canyon orphan wells will be addressed separately by CalGEM, as they may require more complex remedial work. For more information: [www.conservation.ca.gov/calgem/Pages/CatCanyon.aspx](http://www.conservation.ca.gov/calgem/Pages/CatCanyon.aspx). The project timeline is occurring as follows:

- Fall 2022: Site investigation, methane sampling, planning, and permitting commenced.
- January 2023: Plugging commenced.
- July 2023: 67 of the 171 wells have been plugged.
- End of 2024: Work is expected to be completed.

The District is working closely with CalGEM to ensure the project complies with all District regulatory requirements. In addition, we are jointly exploring services the District could provide to ensure wells are properly plugged with no remaining methane emissions or leaks.

**FISCAL IMPACT:**

The costs for the efforts and activities described above are included in the budget approved by your Board. There are no additional fiscal impacts.

**ATTACHMENTS:**

A. Map of Existing Onshore Oil & Gas Wells & State-designated Oil Field Boundaries
B. Status of Onshore Oil and Gas Facilities with Recent/Upcoming Changes
C. Map Showing Offshore Production Facilities and Pipeline Transportation Infrastructure
D. Status of Offshore Oil and Gas Platforms
E. Oil and Gas Compliance Statistics, January 2019 - June 2023
ATTACHMENT A

Map of Existing Onshore Oil & Gas Wells & State-designated Oil Field Boundaries

August 17, 2023

Santa Barbara County Air Pollution Control District
Board of Directors

260 San Antonio Road, Suite A
Santa Barbara, California 93110
ATTACHMENT B

Status of Onshore Oil & Gas Facilities with Recent/Upcoming Changes

August 17, 2023

Santa Barbara County Air Pollution Control District Board of Directors

260 San Antonio Road, Suite A
Santa Barbara, California 93110
<table>
<thead>
<tr>
<th>Facility</th>
<th>Company</th>
<th>Status</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>26 Onshore Oil and Gas Leases</td>
<td>HVI Cat Canyon, Inc. Orphaned Oil Leases</td>
<td>Shut-In</td>
<td>In the process of being plugged and abandoned by CalGEM.</td>
</tr>
<tr>
<td>147 Oil and Gas Wells</td>
<td>Angel Petroleum, LLC.</td>
<td>Transfer Application</td>
<td>Pending transfer application for 147 oil and gas wellbores transferred from Team Operating, LLC. to Angel Petroleum, LLC.</td>
</tr>
<tr>
<td>28 Onshore Oil and Gas Leases</td>
<td>Pacific Coast Energy Company LP</td>
<td>Transfer Application</td>
<td>In the process of transferring from Team Operating, LLC. to Pacific Coast Energy Company LP. Some of these leases will be combined into the PCEC Orcutt Hill stationary source.</td>
</tr>
<tr>
<td>Beachfront Lease (a.k.a. PRC-421)</td>
<td>Venoco, LLC.</td>
<td>Fully Decommissioned</td>
<td>District permit cancelled and site restored. Emission Reduction Credits in process.</td>
</tr>
<tr>
<td>Ellwood Marine Terminal</td>
<td>University of California - Santa Barbara</td>
<td>Fully Decommissioned</td>
<td>District permit cancelled. Site restoration to commence following Environmental Review. Emission Reduction Credits processed.</td>
</tr>
<tr>
<td>Ellwood Onshore Facility</td>
<td>Venoco, LLC.</td>
<td>Idle and For Sale</td>
<td>Listed for sale by Venoco, LLC. bankruptcy trust.</td>
</tr>
<tr>
<td>Escolle Lease - Amrich</td>
<td>Pacific Coast Energy Company LP</td>
<td>Transfer Application</td>
<td>In the process of transferring operator from Amrich Energy to Pacific Coast Energy Company LP.</td>
</tr>
<tr>
<td>Gato Ridge/West Cat Canyon</td>
<td>Cat Canyon Resources</td>
<td>Pipeline Application</td>
<td>Application for gas pipeline to connect Tognazzini Lease to Cat Canyon submitted to SBC P&amp;D.</td>
</tr>
<tr>
<td>Gaviota Oil Heating Facility</td>
<td>Freeport-McMoRan Oil &amp; Gas, LLC.</td>
<td>Fully Decommissioned</td>
<td>District permit cancelled. Emission Reduction Credits processed.</td>
</tr>
<tr>
<td>Gaviota Pump Station</td>
<td>Pacific Pipeline Company / ExxonMobil Pipeline Company, LLC.</td>
<td>Idle</td>
<td>Transferred from Plains Pipeline LP to Pacific Pipeline Company in October 2022. Idle due to Plains All-American Pipeline rupture in May 2015.</td>
</tr>
<tr>
<td>Las Flores Pump Station</td>
<td>Pacific Pipeline Company / ExxonMobil Pipeline Company, LLC.</td>
<td>Idle</td>
<td>Transferred from Plains Pipeline LP to Pacific Pipeline Company in October 2022. Idle due to Plains All-American Pipeline rupture in May 2015.</td>
</tr>
<tr>
<td>Lompoc Oil and Gas Plant</td>
<td>Freeport-McMoRan Oil &amp; Gas, LLC.</td>
<td>Non-Operational</td>
<td>Non operational due to shut-in status of Platform Irene.</td>
</tr>
<tr>
<td>Lompoc Oil Plant</td>
<td>Sentinel Peak Resources</td>
<td>Trucking Application</td>
<td>Application for new truck loading rack and related trucking operations submitted to SBC P&amp;D.</td>
</tr>
<tr>
<td>Orcutt Hill</td>
<td>Pacific Coast Energy Company LP</td>
<td>Pipeline Application</td>
<td>Due to Phillips 66 Santa Maria Refinery closure in January 2023.</td>
</tr>
<tr>
<td>Orcutt Pump Station</td>
<td>Phillips 66 Pipeline</td>
<td>Idle</td>
<td>Shut down and hasn't operated since June 2021 due to Santa Barbara County Fire stop work order. Listed for sale.</td>
</tr>
<tr>
<td>Santa Maria Asphalt Refinery</td>
<td>California Asphalt Production, Inc.</td>
<td>Shut Down and For Sale</td>
<td>Due to Phillips 66 Santa Maria Refinery closure in January 2023.</td>
</tr>
<tr>
<td>Santa Maria Pump Station</td>
<td>Phillips 66 Pipeline</td>
<td>Idle</td>
<td>In preservation mode (hydrocarbon-free). District Part 70 permit renewals issued in February 2023.</td>
</tr>
<tr>
<td>Santa Ynez Unit Oil and Gas Plant (Las Flores Canyon and</td>
<td>ExxonMobil Upstream Company</td>
<td>Preservation Mode</td>
<td>Application for additional steam generator submitted to SBC P&amp;D.</td>
</tr>
<tr>
<td>Sisquoc/North Garey</td>
<td>Asphalta, LLC. (f.k.a. PetroRock, LLC.)</td>
<td>Steam Generator Application</td>
<td>Transferred from Plains Pipeline LP to Pacific Pipeline Company in October 2022. Idle due to Plains All-American Pipeline rupture in May 2015.</td>
</tr>
<tr>
<td>Sisquoc Pump Station</td>
<td>Pacific Pipeline Company / ExxonMobil Pipeline Company, LLC.</td>
<td>Idle</td>
<td>Four legacy wells re-abandoned since 2018. Two additional wells scheduled for re-abandonment starting August 2023.</td>
</tr>
<tr>
<td>Summerland Legacy Well Re-Abandonment</td>
<td>California State Lands Commission</td>
<td>Re-Abandonment</td>
<td>Facility has been decommissioned and wells have been plugged and abandoned. District permit cancellation pending.</td>
</tr>
<tr>
<td>Waite Bradley/Brookings Lease</td>
<td>BE Conway Energy, Inc.</td>
<td>Decommissioned</td>
<td></td>
</tr>
</tbody>
</table>
ATTACHMENT C

Map Showing Offshore Production Facilities and Pipeline Transportation Infrastructure

August 17, 2023

Santa Barbara County Air Pollution Control District
Board of Directors

260 San Antonio Road, Suite A
Santa Barbara, California 93110
ATTACHMENT D

Status of Offshore Oil and Gas Platforms

August 17, 2023

Santa Barbara County Air Pollution Control District
Board of Directors

260 San Antonio Road, Suite A
Santa Barbara, California 93110
<table>
<thead>
<tr>
<th>Facility</th>
<th>Company</th>
<th>Status</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Platform A</td>
<td>DCOR, LLC.</td>
<td>Operational</td>
<td></td>
</tr>
<tr>
<td>2 Platform B</td>
<td>DCOR, LLC.</td>
<td>Operational</td>
<td></td>
</tr>
<tr>
<td>3 Platform C</td>
<td>DCOR, LLC.</td>
<td>Operational</td>
<td></td>
</tr>
<tr>
<td>4 Platform Habitat</td>
<td>DCOR, LLC.</td>
<td>Shut-In</td>
<td>Well abandonment activities planned to begin by 2024, following facility/rig modifications and well diagnostics. Emission Reduction Credits in process.</td>
</tr>
<tr>
<td>5 Platform Harmony</td>
<td>ExxonMobil Upstream Company</td>
<td>Shut-In</td>
<td>Due to Plains All-American Pipeline rupture in May 2015. Facility restart is awaiting method to get oil to market.</td>
</tr>
<tr>
<td>6 Platform Harvest</td>
<td>Freeport-McMoRan Oil &amp; Gas, LLC.</td>
<td>Plugged and Abandoned</td>
<td>Conductors have been removed. Platform decommissioning will follow Environmental Review. Emission Reduction Credits in process.</td>
</tr>
<tr>
<td>7 Platform Henry</td>
<td>DCOR, LLC.</td>
<td>Operational</td>
<td>Due to Plains All-American Pipeline rupture in May 2015. Facility restart is awaiting method to get oil to market.</td>
</tr>
<tr>
<td>8 Platform Heritage</td>
<td>ExxonMobil Upstream Company</td>
<td>Shut-In</td>
<td>Conductors have been removed. Platform decommissioning will follow Environmental Review. Emission Reduction Credits in process.</td>
</tr>
<tr>
<td>9 Platform Hermosa</td>
<td>Freeport-McMoRan Oil &amp; Gas, LLC.</td>
<td>Plugged and Abandoned</td>
<td>Conductors have been removed. Platform decommissioning will follow Environmental Review. Emission Reduction Credits in process.</td>
</tr>
<tr>
<td>10 Platform Hidalgo</td>
<td>Freeport-McMoRan Oil &amp; Gas, LLC.</td>
<td>Plugged and Abandoned</td>
<td>Conductors have been removed. Platform decommissioning will follow Environmental Review. Emission Reduction Credits in process.</td>
</tr>
<tr>
<td>11 Platform Hillhouse</td>
<td>DCOR, LLC.</td>
<td>Operational</td>
<td>Being maintained by Beacon West and ConocoPhillips until the appeal regarding the party responsible for platform decommissioning is decided by the US Interior Board of Land Appeals.</td>
</tr>
<tr>
<td>12 Platform Hogan</td>
<td>Pacific Operators Offshore, LLC. Oil Leases Relinquished to the Federal Bureau of Safety and Environmental Enforcement</td>
<td>Shut-In</td>
<td>Awaiting conductor removal. Platform decommissioning will follow Environmental Review. Emission Reduction Credits in process.</td>
</tr>
<tr>
<td>13 Platform Holly</td>
<td>California State Lands Commission</td>
<td>Plugged and Abandoned</td>
<td>Due to Plains All-American Pipeline rupture in May 2015. Facility restart is awaiting method to get oil to market.</td>
</tr>
<tr>
<td>14 Platform Hondo</td>
<td>ExxonMobil Upstream Company</td>
<td>Shut-In</td>
<td>Being maintained by Beacon West and ConocoPhillips until the appeal regarding the party responsible for platform decommissioning is decided by the US Interior Board of Land Appeals.</td>
</tr>
<tr>
<td>15 Platform Houchin</td>
<td>Pacific Operators Offshore, LLC. Oil Leases Relinquished to the Federal Bureau of Safety and Environmental Enforcement</td>
<td>Shut-In</td>
<td>Due to Phillips 66 Santa Maria Refinery closure in January 2023. Restart awaiting method to get oil to market.</td>
</tr>
<tr>
<td>16 Platform Irene</td>
<td>Freeport-McMoRan Oil &amp; Gas, LLC.</td>
<td>Shut-In</td>
<td></td>
</tr>
</tbody>
</table>
ATTACHMENT E

Oil and Gas Compliance Statistics
January 2019 - June 2023

August 17, 2023

Santa Barbara County Air Pollution Control District
Board of Directors

260 San Antonio Road, Suite A
Santa Barbara, California 93110
## Oil and Gas Compliance Statistics

### 2019

<table>
<thead>
<tr>
<th>Company</th>
<th>Number of Oil and Gas Stationary Sources ¹</th>
<th>Number of Inspections</th>
<th>Number of Notices of Violation</th>
<th>Number of Methane Leak Violations ²</th>
<th>Notice of Violation Penalties Received ³</th>
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<tr>
<td>1 BE Conway Energy, Inc.</td>
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<td>4 California State Lands Commission</td>
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<td>5 Chevron Phillips Chemical Company LP</td>
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<td>7 DCOR, LLC.</td>
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<td>21</td>
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<td>E&amp;B Natural Resources Management Corporation</td>
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<td>8 Elysium Russell, LLC.</td>
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<tr>
<td>9 ERG Operating Company, LLC.</td>
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<td>10 ExxonMobil Upstream Company</td>
<td>1</td>
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<td>11 Freeport-McMoRan Oil &amp; Gas, LLC.</td>
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<td>12 Globe Oil Exploration LTD</td>
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<td>14 HVI Cat Canyon, Inc.</td>
<td>19</td>
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<td>15 Krummrich Engineering Corporation</td>
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<td>18 Pacific Coast Energy Company LP</td>
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<td>19 Pacific Operators Offshore, LLC.</td>
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<td>23 Plains Pipeline LP</td>
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<td>24 PRE Resources, Inc.</td>
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<td>25 Purisima Hills, LLC.</td>
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<td>27 Sentinel Peak Resources California, LLC.</td>
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<td>28 Sierra Resources, Inc.</td>
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<td>29 Soladino Energy Partners</td>
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### Notes

3. Penalties received in 2019 are for 18 NOVs that were issued between March 2016 and September 2019.
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<th>Number of Methane Leak Violations</th>
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**Notes**


3. Penalties received in 2020 are for 115 NOVs that were issued between May 2019 and September 2020.

# Oil and Gas Compliance Statistics 2021

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<tr>
<th>Company</th>
<th>Number of Oil and Gas Stationary Sources</th>
<th>Number of Inspections</th>
<th>Number of Notices of Violation</th>
<th>Number of Methane Leak Violations</th>
<th>Notice of Violation Penalties Received</th>
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</thead>
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**Notes**

3. Penalties received in 2021 are for 61 NOVs that were issued between June 2019 and September 2021.
## Oil and Gas Compliance Statistics

### 2022

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<th>Number of Oil and Gas Stationary Sources ¹</th>
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<td>California State Lands Commission</td>
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</tr>
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### Notes

3. Penalties received in 2022 are for 55 NOVs that were issued between December 2020 and September 2022.
## Oil and Gas Compliance Statistics

### January - June 2023

<table>
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<tr>
<th>Company</th>
<th>Number of Oil and Gas Stationary Sources</th>
<th>Number of Inspections</th>
<th>Number of Notices of Violation</th>
<th>Number of Methane Leak Violations</th>
<th>Notice of Violation Penalties Received</th>
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<td>1  BE Conway Energy, Inc.</td>
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</tbody>
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### Notes

3. Penalties received in 2023 January - June are for 14 NOVs that were issued between April 2021 and April 2023.