

Electronically Received 07/05/2023 03:44 PM

1 Elizabeth Jones, CA Bar No. 326118  
2 Hollin Kretzmann, CA Bar No. 290054  
3 Kassia Siegel, CA Bar No. 209497  
4 CENTER FOR BIOLOGICAL DIVERSITY  
5 1212 Broadway, Suite 800  
6 Oakland, CA 94612  
7 ljones@biologicaldiversity.org  
8 hkretzmann@biologicaldiversity.org  
9 ksiegel@biologicaldiversity.org  
10 Tel: (310) 365-9281  
11 Fax: (510) 844-7150

12 Deborah A. Sivas, CA Bar No. 135446  
13 ENVIRONMENTAL LAW CLINIC  
14 Mills Legal Clinic at Stanford Law School  
15 559 Nathan Abbott Way  
16 Stanford, CA 94305-8610  
17 dsivas@stanford.edu  
18 Tel: (650) 723-0325  
19 Fax: (650) 723-4426

20 *Attorneys for Petitioner Center for Biological Diversity*

21 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
22 **COUNTY OF ALAMEDA**

23 CENTER FOR BIOLOGICAL DIVERSITY, a  
24 non-profit organization,

25 Petitioner,

26 v.

27 CALIFORNIA GEOLOGIC ENERGY  
28 MANAGEMENT DIVISION, a political  
subdivision of the State of California, and  
DOES 1–20, inclusive,

Respondents,

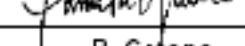
SHADOW WOLF ENERGY, LLC, a Nevada  
limited liability company; CALIFORNIA  
RESOURCES ELK HILLS, LLC, a Delaware  
limited liability company; and DOES 21–40,  
inclusive,

Real Parties in Interest.

**FILED**  
Superior Court of California  
County of Alameda

07/14/2023

Clad Fluke, Executive Officer / Clerk of the Court

By:  Deputy  
P. Greene

Case No.: 22CV023134

**STIPULATED REQUEST FOR  
DISMISSAL**

ASSIGNED FOR ALL PURPOSES TO:  
JUDGE JAMES REILLY  
DEPARTMENT 25



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**IT IS SO STIPULATED.**

Respectfully Submitted,

DATED: June 21, 2023

---

Elizabeth Jones  
Hollin Kretzmann  
Kassia Siegel  
Center for Biological Diversity  
1212 Broadway, Suite 800  
Oakland, CA 94612  
[ljones@biologicaldiversity.org](mailto:ljones@biologicaldiversity.org)  
[hkretzmann@biologicaldiversity.org](mailto:hkretzmann@biologicaldiversity.org)  
[ksiegel@biologicaldiversity.org](mailto:ksiegel@biologicaldiversity.org)

Deborah Sivas  
Environmental Law Clinic  
Mills Legal Clinic at Stanford Law School  
599 Nathan Abbot Way  
[dsivas@stanford.edu](mailto:dsivas@stanford.edu)

*Attorneys for Petitioner Center for Biological Diversity*

**Brandon S.  
Walker**

Digitally signed by Brandon S. Walker  
Date: 2023.06.21 11:50:14 -07'00'

DATED: June 21, 2023

---

Brandon S. Walker  
Thomas Kinzinger  
California Attorney General's Office  
1300 I Street, Suite 1101  
Sacramento, CA 94244-2550  
[Brandon.Walker@doj.ca.gov](mailto:Brandon.Walker@doj.ca.gov)  
[Thomas.Kinzinger@doj.ca.gov](mailto:Thomas.Kinzinger@doj.ca.gov)

*Attorneys for California Geologic Energy Management Division*

DATED: June 30, 2023

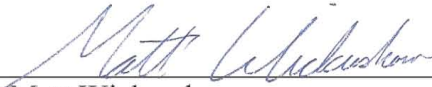
---

Bradley O. Cebeci

1 Eugene Rome  
2 ROME & ASSOCIATES A.P.C.  
3 2029 Century Park East, Suite 450  
4 Los Angeles, CA 90067  
5 [bcebeci@romeandassociates.com](mailto:bcebeci@romeandassociates.com)  
6 [erome@romeandassociates.com](mailto:erome@romeandassociates.com)  
7 Craig M. Lynch  
8 Lynch & Lynch, LLP  
9 P.O Box 13515  
10 Bakersfield, CA 93389-3515  
11 [clynch@lynchandlynchlawfirm.com](mailto:clynch@lynchandlynchlawfirm.com)

*Attorneys for Shadow Wolf Energy LLC*

12 DATED: June 29, 2023



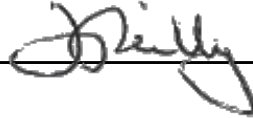
13 Matt Wickersham  
14 Jeffrey Dintzer  
15 Garrett Stanton  
16 ALSTON & BIRD  
17 333 South Hope Street  
18 Los Angeles, CA 90071  
19 [Matt.Wickersham@alston.com](mailto:Matt.Wickersham@alston.com)  
20 [Jeffrey.Dintzer@alston.com](mailto:Jeffrey.Dintzer@alston.com)  
21 [Garrett.Stanton@alston.com](mailto:Garrett.Stanton@alston.com)

*Attorneys for California Resources Elk Hills, LLC*

~~PROPOSED~~ ORDER

GOOD CAUSE APPEARING, and pursuant to the above-referenced stipulation of the Parties, IT IS SO ORDERED.

DATED: 07/14/2023



James Reilly / Judge

# Exhibit 1



California  
**Department of Conservation**  
Geologic Energy Management Division

Gavin Newsom, Governor  
David Shabazian, Director  
715 P Street, MS 1803  
Sacramento, CA. 95814  
T: (916) 445-5986

---

4/24/2023

Robert Bell  
California Resources Elk Hills, LLC  
900 Old River Road  
Bakersfield, CA 93311

Dear California Resources Elk Hills, LLC,

Your notice to New Drill dated 9/21/2022, and received 9/22/2022, and our report No. 7034335 issued 11/3/2022 are cancelled. If you have an individual bond on file covering this notice, it will be returned. No request for such return is necessary.



California  
**Department of Conservation**  
Geologic Energy Management Division

Gavin Newsom, Governor  
David Shabazian, Director  
715 P Street, MS 1803  
Sacramento, CA. 95814  
T: (916) 445-5986

---

4/24/2023

Robert Bell  
California Resources Elk Hills, LLC  
900 Old River Road  
Bakersfield, CA 93311

Dear California Resources Elk Hills, LLC,

Your notice to New Drill dated 9/27/2022, and received 9/27/2022, and our report No. 7034336 issued 11/3/2022 are cancelled. If you have an individual bond on file covering this notice, it will be returned. No request for such return is necessary.





California  
**Department of Conservation**  
Geologic Energy Management Division

Gavin Newsom, Governor  
David Shabazian, Director  
715 P Street, MS 1803  
Sacramento, CA. 95814  
T: (916) 445-5986

---

4/24/2023

Robert Bell  
California Resources Elk Hills, LLC  
900 Old River Road  
Bakersfield, CA 93311

Dear California Resources Elk Hills, LLC,

Your notice to New Drill dated 10/5/2022, and received 10/5/2022, and our report No. 7034337 issued 11/3/2022 are cancelled. If you have an individual bond on file covering this notice, it will be returned. No request for such return is necessary.



California  
**Department of Conservation**  
Geologic Energy Management Division

Gavin Newsom, Governor  
David Shabazian, Director  
715 P Street, MS 1803  
Sacramento, CA. 95814  
T: (916) 445-5986

---

4/24/2023

Robert Bell  
California Resources Elk Hills, LLC  
900 Old River Road  
Bakersfield, CA 93311

Dear California Resources Elk Hills, LLC,

Your notice to New Drill dated 10/10/2022, and received 10/10/2022, and our report No. 7034338 issued 11/3/2022 are cancelled. If you have an individual bond on file covering this notice, it will be returned. No request for such return is necessary.



California  
**Department of Conservation**  
Geologic Energy Management Division

Gavin Newsom, Governor  
David Shabazian, Director  
715 P Street, MS 1803  
Sacramento, CA. 95814  
T: (916) 445-5986

---

4/24/2023

Robert Bell  
California Resources Elk Hills, LLC  
900 Old River Road  
Bakersfield, CA 93311

Dear California Resources Elk Hills, LLC,

Your notice to New Drill dated 10/5/2022, and received 10/5/2022, and our report No. 7034339 issued 11/3/2022 are cancelled. If you have an individual bond on file covering this notice, it will be returned. No request for such return is necessary.



California  
**Department of Conservation**  
Geologic Energy Management Division

Gavin Newsom, Governor  
David Shabazian, Director  
715 P Street, MS 1803  
Sacramento, CA. 95814  
T: (916) 445-5986

---

4/24/2023

Robert Bell  
California Resources Elk Hills, LLC  
900 Old River Road  
Bakersfield, CA 93311

Dear California Resources Elk Hills, LLC,

Your notice to New Drill dated 10/5/2022, and received 10/5/2022, and our report No. 7034340 issued 11/3/2022 are cancelled. If you have an individual bond on file covering this notice, it will be returned. No request for such return is necessary.



California  
**Department of Conservation**  
Geologic Energy Management Division

Gavin Newsom, Governor  
David Shabazian, Director  
715 P Street, MS 1803  
Sacramento, CA. 95814  
T: (916) 445-5986

---

4/24/2023

Robert Bell  
California Resources Elk Hills, LLC  
900 Old River Road  
Bakersfield, CA 93311

Dear California Resources Elk Hills, LLC,

Your notice to New Drill dated 10/11/2022, and received 10/11/2022, and our report No. 7034341 issued 11/3/2022 are cancelled. If you have an individual bond on file covering this notice, it will be returned. No request for such return is necessary.



California  
**Department of Conservation**  
Geologic Energy Management Division

Gavin Newsom, Governor  
David Shabazian, Director  
715 P Street, MS 1803  
Sacramento, CA. 95814  
T: (916) 445-5986

---

4/24/2023

Robert Bell  
California Resources Elk Hills, LLC  
900 Old River Road  
Bakersfield, CA 93311

Dear California Resources Elk Hills, LLC,

Your notice to New Drill dated 10/18/2022, and received 10/18/2022, and our report No. 7034342 issued 11/3/2022 are cancelled. If you have an individual bond on file covering this notice, it will be returned. No request for such return is necessary.

# Exhibit 2



**VIA ELECTRONIC MAIL**

May 5, 2023

Mr. Craig M. Lynch  
 Lynch and Lynch  
 P.O Box 13515  
 Bakersfield, CA 93389-3515  
[clynch@lynchandlynchlawfirm.com](mailto:clynch@lynchandlynchlawfirm.com)

Dear Mr. Lynch:

CENTER FOR BIOLOGICAL DIVERSITY (CBD) V. CALIFORNIA GEOLOGIC ENERGY MANAGEMENT DIVISION (CALGEM) ALAMEDA COUNTY SUPERIOR COURT, CASE NO. 22CV023134

This letter is to notify Shadow Wolf Energy, LLC (Shadow Wolf) that the California Geologic Energy Management Division (CalGEM) is rescinding approval of the following notices of intention (NOI) to drill new wells and voiding the associated determinations made pursuant to the California Environmental Quality Act (CEQA) for these NOIs:

| Well Name        | Well API   | Date Approved | NOI Number |
|------------------|------------|---------------|------------|
| KC Lupus 2       | 0403730583 | 11/2/2022     | 7034291    |
| KC Lupus 1       | 0403730584 | 11/2/2022     | 7034292    |
| KC Lupus 3       | 0403730585 | 11/2/2022     | 7034296    |
| KC Lupus 4       | 0403730586 | 11/2/2022     | 7034303    |
| KC Lupus 5       | 0403730587 | 11/2/2022     | 7034304    |
| Castruccio SWE 2 | 0403730588 | 11/16/2022    | 7034550    |
| Castruccio SWE 4 | 0403730589 | 11/16/2022    | 7034568    |
| Castruccio SWE 1 | 0403730590 | 11/16/2022    | 7034570    |
| Castruccio SWE 3 | 0403730591 | 11/16/2022    | 7034635    |

Any action to drill the above-referenced NOIs is no longer approved by CalGEM.

The above-referenced NOIs were approved by the State Oil and Gas Supervisor on November 2, 2022, and November 16, 2022, respectively. Subsequent litigation (Alameda County Superior Court, Case No. 22CV023134) was initiated by Center for Biological Diversity (CBD) against both Shadow Wolf and CalGEM, asserting (in part) that the environmental review under the CEQA was inadequate in connection with above-referenced NOIs, and other approvals.

Although CalGEM does not necessarily agree that the CEQA review was inadequate, the approvals are not consistent with CalGEM's current practices. Consistent with



CalGEM's mission to protect public health and safety while safeguarding the environment, CalGEM believes that further analysis must take place before the wells can be used for oil and gas extraction.

The environmental review process may be reinitiated through CalGEM's permitting process, which will initiate CalGEM's further environmental review through the CEQA process. If you would like to discuss the process for further environmental review of Shadow Wolf's notices of intention to drill, please contact Senior Environmental Scientist Supervisor Meri A. Meraz.

Thank you,

DocuSigned by:  
  
1202B4855ED7493...

Gabe Tiffany  
Acting State Oil and Gas Supervisor

cc: Eugene Rome  
ROME & ASSOCIATES A.P.C.  
[erome@romeandassociates.com](mailto:erome@romeandassociates.com)  
Attorney for Shadow Wolf Energy, LLC

Meri A. Meraz  
Senior Environmental Scientist Supervisor  
California Geologic Energy Management Division CEQA Unit  
[Meri.Meraz@conservation.ca.gov](mailto:Meri.Meraz@conservation.ca.gov)

# Exhibit 3



**VIA ELECTRONIC MAIL**

May 5, 2023

Mr. Matt Wickersham  
 ALSTON & BIRD  
 333 South Hope Street  
 Los Angeles, CA 90071  
[Matt.Wickersham@alston.com](mailto:Matt.Wickersham@alston.com)

Dear Mr. Wickersham:

**CANCELLATION OF PERMITS IN THE ELK HILLS OIL FIELD**

On March 23, 2023, California Geologic Energy Management Division (CalGEM) received a request from Deborah Young of California Resources Corporation (CRC) to cancel the following permits:

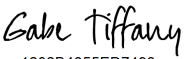
| <b>Well Designation</b> | <b>Well API</b> | <b>Date Approved</b> | <b>Permit Number</b> |
|-------------------------|-----------------|----------------------|----------------------|
| 16H-27S                 | 0403069647      | 11/2/2022            | 7034337              |
| 17H-6G                  | 0403069645      | 11/2/2022            | 7034335              |
| 48SEH-5G                | 0403069650      | 11/2/2022            | 7034340              |
| 54XH-29S                | 0403069649      | 11/2/2022            | 7034339              |
| 66H-1B                  | 0403069648      | 11/2/2022            | 7034338              |
| 71SH-2B                 | 0403069652      | 11/2/2022            | 7034342              |
| 83NWH-35S               | 0403069651      | 11/2/2022            | 7034341              |
| 87WH-1B                 | 0403069646      | 11/2/2022            | 7034336              |

Pursuant to CRC's request, the above-referenced permits were cancelled on April 24, 2023.

As you are aware, the above-referenced permits are the subject of litigation initiated by Center for Biological Diversity (CBD) against and California Resources Elk Hills (CREH). (Alameda County Superior Court, Case No. 22CV023134)

This letter serves to acknowledge the cancellation of the above-referenced permits and CREH's decision to not proceed forward with drilling the above-referenced new wells. Please note, the associated determinations made pursuant to the California Environmental Quality Act (CEQA) are now void for the above-referenced permits. Should CREH wish to proceed with these new wells, the environmental review process may be reinitiated through CalGEM's permitting process, which will initiate CalGEM's further environmental review through the CEQA process.

Sincerely,

DocuSigned by:  
  
1202B4855ED7493...

Gabe Tiffany  
Acting State Oil and Gas Supervisor

Enclosures: Permit Cancellation Email, March 23, 2023.  
CalGEM Cancellation Letters, April 24, 2023.  
RE: E-Service: Center for Biological Diversity v CalGEM, Case No.  
22CV023134 Email, April 25, 2023.

**From:** [Stikes\\_Matt@DOC](mailto:Stikes_Matt@DOC)  
**To:** [Young\\_Deborah\\_G](mailto:Young_Deborah_G)  
**Subject:** RE: Permit Cancellation  
**Date:** Monday, April 24, 2023 2:45:00 PM  
**Attachments:** [image001.jpg](#)

Deborah,

During field inspections at the locations listed below, no conductor casings were found. Therefore, these permits to drill have been cancelled.

Regards,

Matt Stikes  
Senior Oil & Gas Engineer  
Central District, Central Area  
Department of Conservation  
Geologic Energy Management  
11000 River Run Blvd.  
Bakersfield, CA 93311  
(661) 326-6034 Desk  
(661) 322-4031 Office  
[matt.stikes@conservation.ca.gov](mailto:matt.stikes@conservation.ca.gov)

**From:** Young, Deborah G <[Deborah.Young@crc.com](mailto:Deborah.Young@crc.com)>  
**Sent:** Thursday, March 23, 2023 3:59 PM  
**To:** Stikes, Matt@DOC <[Matt.Stikes@conservation.ca.gov](mailto:Matt.Stikes@conservation.ca.gov)>  
**Subject:** Permit Cancellation

Good afternoon Mr. Stikes, can you please cancel the following permits? Also, can I please receive confirmation when they are canceled?:

| District | Notice Type     | Issued Date | Operator                            | Well Designation | Well Type | Well API   | County | Field     | Permit # |
|----------|-----------------|-------------|-------------------------------------|------------------|-----------|------------|--------|-----------|----------|
| Inland   | NOI - New Drill | 11/2/2022   | California Resources Elk Hills, LLC | 16H-27S          | Oil & Gas | 0403069647 | Kern   | Elk Hills | 7034337  |
| Inland   | NOI - New Drill | 11/2/2022   | California Resources Elk Hills, LLC | 17H-6G           | Oil & Gas | 0403069645 | Kern   | Elk Hills | 7034335  |
| Inland   | NOI - New Drill | 11/2/2022   | California Resources Elk Hills, LLC | 48SEH-5G         | Oil & Gas | 0403069650 | Kern   | Elk Hills | 7034340  |
| Inland   | NOI - New Drill | 11/2/2022   | California Resources Elk Hills, LLC | 54XH-29S         | Oil & Gas | 0403069649 | Kern   | Elk Hills | 7034339  |
| Inland   | NOI - New Drill | 11/2/2022   | California Resources Elk Hills, LLC | 66H-1B           | Oil & Gas | 0403069648 | Kern   | Elk Hills | 7034338  |
| Inland   | NOI - New Drill | 11/2/2022   | California Resources Elk Hills, LLC | 71SH-2B          | Oil & Gas | 0403069652 | Kern   | Elk Hills | 7034342  |
| Inland   | NOI - New Drill | 11/2/2022   | California Resources Elk Hills, LLC | 83NWH-35S        | Oil & Gas | 0403069651 | Kern   | Elk Hills | 7034341  |
| Inland   | NOI - New Drill | 11/2/2022   | California Resources Elk Hills, LLC | 87WH-1B          | Oil & Gas | 0403069646 | Kern   | Elk Hills | 7034336  |

Respectfully,  
DEBORAH YOUNG  
Regulatory Affairs Analyst



900 Old River Road  
Bakersfield, CA 93311  
C: 661.440.1833  
P: 661.763.6224  
[Deborah.Young@crc.com](mailto:Deborah.Young@crc.com)



California  
**Department of Conservation**  
Geologic Energy Management Division

Gavin Newsom, Governor  
David Shabazian, Director  
715 P Street, MS 1803  
Sacramento, CA. 95814  
T: (916) 445-5986

4/24/2023

Robert Bell  
California Resources Elk Hills, LLC  
900 Old River Road  
Bakersfield, CA 93311

Dear California Resources Elk Hills, LLC,

Your notice to New Drill dated 9/21/2022, and received 9/22/2022, and our report No. 7034335 issued 11/3/2022 are cancelled. If you have an individual bond on file covering this notice, it will be returned. No request for such return is necessary.



California  
**Department of Conservation**  
Geologic Energy Management Division

Gavin Newsom, Governor  
David Shabazian, Director  
715 P Street, MS 1803  
Sacramento, CA. 95814  
T: (916) 445-5986

4/24/2023

Robert Bell  
California Resources Elk Hills, LLC  
900 Old River Road  
Bakersfield, CA 93311

Dear California Resources Elk Hills, LLC,

Your notice to New Drill dated 9/27/2022, and received 9/27/2022, and our report No. 7034336 issued 11/3/2022 are cancelled. If you have an individual bond on file covering this notice, it will be returned. No request for such return is necessary.



California  
**Department of Conservation**  
Geologic Energy Management Division

Gavin Newsom, Governor  
David Shabazian, Director  
715 P Street, MS 1803  
Sacramento, CA. 95814  
T: (916) 445-5986

4/24/2023

Robert Bell  
California Resources Elk Hills, LLC  
900 Old River Road  
Bakersfield, CA 93311

Dear California Resources Elk Hills, LLC,

Your notice to New Drill dated 10/5/2022, and received 10/5/2022, and our report No. 7034337 issued 11/3/2022 are cancelled. If you have an individual bond on file covering this notice, it will be returned. No request for such return is necessary.





California  
**Department of Conservation**  
Geologic Energy Management Division

Gavin Newsom, Governor  
David Shabazian, Director  
715 P Street, MS 1803  
Sacramento, CA. 95814  
T: (916) 445-5986

4/24/2023

Robert Bell  
California Resources Elk Hills, LLC  
900 Old River Road  
Bakersfield, CA 93311

Dear California Resources Elk Hills, LLC,

Your notice to New Drill dated 10/10/2022, and received 10/10/2022, and our report No. 7034338 issued 11/3/2022 are cancelled. If you have an individual bond on file covering this notice, it will be returned. No request for such return is necessary.



California  
**Department of Conservation**  
Geologic Energy Management Division

Gavin Newsom, Governor  
David Shabazian, Director  
715 P Street, MS 1803  
Sacramento, CA. 95814  
T: (916) 445-5986

4/24/2023

Robert Bell  
California Resources Elk Hills, LLC  
900 Old River Road  
Bakersfield, CA 93311

Dear California Resources Elk Hills, LLC,

Your notice to New Drill dated 10/5/2022, and received 10/5/2022, and our report No. 7034339 issued 11/3/2022 are cancelled. If you have an individual bond on file covering this notice, it will be returned. No request for such return is necessary.



California  
**Department of Conservation**  
Geologic Energy Management Division

Gavin Newsom, Governor  
David Shabazian, Director  
715 P Street, MS 1803  
Sacramento, CA. 95814  
T: (916) 445-5986

4/24/2023

Robert Bell  
California Resources Elk Hills, LLC  
900 Old River Road  
Bakersfield, CA 93311

Dear California Resources Elk Hills, LLC,

Your notice to New Drill dated 10/5/2022, and received 10/5/2022, and our report No. 7034340 issued 11/3/2022 are cancelled. If you have an individual bond on file covering this notice, it will be returned. No request for such return is necessary.



California  
**Department of Conservation**  
Geologic Energy Management Division

Gavin Newsom, Governor  
David Shabazian, Director  
715 P Street, MS 1803  
Sacramento, CA. 95814  
T: (916) 445-5986

4/24/2023

Robert Bell  
California Resources Elk Hills, LLC  
900 Old River Road  
Bakersfield, CA 93311

Dear California Resources Elk Hills, LLC,

Your notice to New Drill dated 10/11/2022, and received 10/11/2022, and our report No. 7034341 issued 11/3/2022 are cancelled. If you have an individual bond on file covering this notice, it will be returned. No request for such return is necessary.



California  
**Department of Conservation**  
Geologic Energy Management Division

Gavin Newsom, Governor  
David Shabazian, Director  
715 P Street, MS 1803  
Sacramento, CA. 95814  
T: (916) 445-5986

4/24/2023

Robert Bell  
California Resources Elk Hills, LLC  
900 Old River Road  
Bakersfield, CA 93311

Dear California Resources Elk Hills, LLC,

Your notice to New Drill dated 10/18/2022, and received 10/18/2022, and our report No. 7034342 issued 11/3/2022 are cancelled. If you have an individual bond on file covering this notice, it will be returned. No request for such return is necessary.

**From:** [Wickersham, Matt](#)  
**To:** [Sylvia Regan](#); [Liz Jones](#); [Hollin Kretzmann](#); [Kassie Siegel](#); [Deborah Ann Sivas](#)  
**Cc:** [Thomas Kinzinger](#); [clynch@lynchandlynchlawfirm.com](#); [bcebeci@romeandassociates.com](#); [Brandon Walker](#); [Dintzer, Jeffrey](#); [erome@romeandassociates.com](#)  
**Subject:** RE: E-Service: Center for Biological Diversity v CalGEM, Case No. 22CV023134  
**Date:** Tuesday, April 25, 2023 9:17:17 AM  
**Attachments:** [2023.04.24 CalGEM Cancellation Letters.pdf](#)  
[CalGEM WellSTAR summaries.pdf](#)

---

**EXTERNAL EMAIL:** This message was sent from outside DOJ. Please do not click links or open attachments that appear suspicious.

Hi all,

California Resources Elk Hills (“CREH”) has decided not to proceed with the new wells that are the subject of the claims against it in this CEQA litigation. Per the attached letter from CalGEM, the identified NOIs have been cancelled by CalGEM, as also reflected on the WellSTAR webpages. Given the cancellation of all relevant approvals involving CREH, CREH requests that CBD stipulate to a dismissal of its claims as against CREH, by dismissing the Second Cause of Action and amending Exhibit A to omit the 8 NOIs initially issued to CREH. (See, e.g., *Coal. for a Sustainable Future in Yucaipa v. City of Yucaipa* (2011) 198 Cal.App.4th 939, 942.) If CBD will not agree to a stipulated dismissal, CREH requests some available times for a meet and confer with CBD this week regarding CREH’s intention to file a demurrer and motion to dismiss on the grounds of mootness.

Thanks,

Matt Wickersham

**ALSTON & BIRD**

333 South Hope Street

Los Angeles, CA 90071

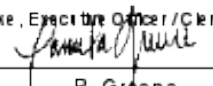
+1 213 576 1185 (O)

+1 310 699 0931 (M)

[Matt.Wickersham@alston.com](mailto:Matt.Wickersham@alston.com)

---

NOTICE: This e-mail message and all attachments may contain legally privileged and confidential information intended solely for the use of the addressee. If you are not the intended recipient, you are hereby notified that you may not read, copy, distribute or otherwise use this message or its attachments. If you have received this message in error, please notify the sender by email and delete all copies of the message immediately.

|                                                                                             |                                                                                                                                                                   |
|---------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>SUPERIOR COURT OF CALIFORNIA<br/>COUNTY OF ALAMEDA</b>                                   | Reserved for Clerk's File Stamp                                                                                                                                   |
| COURTHOUSE ADDRESS:<br>Rene C. Davidson Courthouse<br>1225 Fallon Street, Oakland, CA 94612 | <b>FILED</b><br>Superior Court of California<br>County of Alameda<br>07/17/2023                                                                                   |
| PLAINTIFF/PETITIONER:<br>Center for Biological Diversity                                    | Chad Finke, Executive Officer / Clerk of the Court<br>By:  Deputy<br>P. Greene |
| DEFENDANT/RESPONDENT:<br>California Geologic Energy Management Division et al               |                                                                                                                                                                   |
| <b>CERTIFICATE OF ELECTRONIC SERVICE CODE OF CIVIL<br/>PROCEDURE 1010.6</b>                 | CASE NUMBER:<br>22CV023134                                                                                                                                        |

I, the below named Executive Officer/Clerk of Court of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served one copy of the Stipulation and Order Stipulated Request for Dismissal entered herein upon each party or counsel of record in the above entitled action, by electronically serving the document(s) from my place of business, in accordance with standard court practices.

Elizabeth Jones  
Center for Biological Diversity  
ljones@biologicaldiversity.org

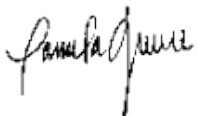
Jeffrey David Dintzer  
Alston & Bird  
jeffrey.dintzer@alston.com

Michael Nathan Mills  
Stoel Rives LLP  
michael.mills@stoel.com

Dated: 07/17/2023

Chad Finke, Executive Officer / Clerk of the Court

By:

  
P. Greene, Deputy Clerk