

1 ALLYN L. STERN (SBN 337259)
2 BEVERIDGE & DIAMOND PC
3 600 University Street, Suite 1601
4 Seattle, WA 98101-3109
5 Telephone: +1.206.315.4800
6 Facsimile: +1.206.315.4801
7 Email: AStern@bdlaw.com

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9 Attorney for Petitioner
10 HALLIBURTON ENERGY SERVICES, INC.

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STATE WATER RESOURCES CONTROL BOARD

STATE OF CALIFORNIA

In the Matter of Halliburton Energy Services,
Inc.,

Petitioner,

For Review of Los Angeles Regional Water
Quality Control Board Investigative Order No.
R4-2026-0003, California Water Code Section
13267 Order to Provide a Technical Report for
Subsurface Investigation, dated August 21,
2026, concerning the Patagonia Works property
in Ventura, California

Case No.

**HALLIBURTON'S PETITION FOR
REVIEW; REQUEST FOR HEARING
AND STAY; AND REQUEST FOR
ABEYANCE**

1 **I. PETITION FOR REVIEW**

2 Pursuant to Water Code section 13320 and California Code of Regulations, title 23,
3 section 2050 et seq., Halliburton Energy Services, Inc. (“Halliburton”) petitions the State Water
4 Resources Control Board (“State Board”) for review of Investigative Order No. R4-2026-0003,
5 issued by the Los Angeles Regional Water Quality Control Board (“Regional Board”) on August
6 21, 2026 (“Order”). The Order requires Halliburton and Patagonia Works, formerly known as
7 Lost Arrow Corporation (“Patagonia”), to submit historical information and prepare a work plan
8 for investigation of soil, soil vapor, and groundwater at Patagonia’s property in Ventura,
9 California. A copy of the Order, including its transmittal letter and figures, is attached as Exhibit
10 A.

11 The Regional Board’s basis for naming Halliburton is N.L. Baroid/NL Industries, Inc.’s
12 (“Baroid”) historical operations at portions of the property and a subsequent corporate succession
13 involving Dresser Industries and Halliburton. The Order describes chemical storage, reported
14 spills, soil sampling, and regulatory correspondence concerning Baroid in 1985. It also describes
15 other industrial operations unrelated to Baroid, including petroleum releases, substantial
16 subsequent remediation, and chlorinated solvent contamination at neighboring properties. The
17 Regional Board acknowledges that the contamination may involve a regional plume with multiple
18 sources. Order, pp. 1–6 (Findings 2–4).

19 It is not that the Regional Board lacks authority to investigate suspected discharges. The
20 issue is that the Order does not connect the evidence concerning Baroid to the breadth of the
21 investigation the Order imposes on Halliburton. The Order identifies historical Baroid activities at
22 discrete portions of the Site but requires Halliburton to design and undertake a much larger
23 investigation of VOCs and other contaminants throughout the Site and vicinity, including new
24 monitoring probes and wells, without explaining why the evidence concerning Baroid supports
25 those broader obligations. Order, pp. 8–9 (Requirements 4, 6).

26 This distinction matters because the Order itself identifies multiple historical operators
27 and potential sources, including petroleum operations and contamination at neighboring
28 properties, and expressly recognizes that there may be a regional chlorinated solvent plume from

multiple offsite sources. Order, pp.1–6 (Findings 2–4). This is contrary to Water Code section 13267, which requires the burden imposed on Halliburton to bear a reasonable relationship to the need for the investigative reports, and it requires the Regional Board to identify the evidence supporting the reports it requires from Halliburton. The appropriate remedy is to rescind the Order as applied to Halliburton, or at a minimum, to require a focused first phase that evaluates the Baroid-specific evidence and reasonably available records before developing any plan for field investigation.

Halliburton also requests a hearing and an immediate stay of the Order as applied to Halliburton. If the immediate compliance obligations are stayed or otherwise addressed through a written Regional Board extension or modification, Halliburton requests that the petition then be held in abeyance to permit the parties to attempt to resolve the matter without further State Board proceedings.

II. THE NAME AND ADDRESS OF PETITIONER

The name and address of Petitioner is:

Halliburton Energy Services, Inc.
3000 North Sam Houston Parkway East
Houston, Texas 77032
Telephone: 337-256-7670
Email: Andrea.Bourque@halliburton.com

Petitioner should be contacted through its legal counsel:

Allyn L. Stern
Beveridge & Diamond, PC
600 University Street, Suite 1601
Seattle, WA 98101-3109
Telephone: (206) 620-3065

Email: AStern@bdlaw.com

III. THE REGIONAL BOARD ACTION TO BE REVIEWED

Halliburton requests a review of the Order in its entirety as applied to Halliburton, including its designation as a suspected discharger in Finding 5 and the obligations imposed by Requirements 1 through 9.

1 The Order concerns property identified as the Patagonia Works “Main Campus,”
2 comprising 210, 230, and 280 West Main Street; 43 and 59 South Olive Street; and 235 and 259
3 West Santa Clara Street, Ventura, California 93001 (“Site”). The Regional Board identifies the
4 matter as Site Cleanup Program No. 1666 and GeoTracker Global ID No. T10000024141. Order,
5 p. 1 (Letter); pp. 9–10 (Requirement 8).

6 Requirements 1 through 3 direct Halliburton to submit existing environmental assessment
7 reports, descriptions of current and historical operations, and information concerning chemical
8 and waste handling practices. Requirement 4 directs them to submit an investigation work plan.
9 Each submission is due October 20, 2026. Requirement 6 requires further investigation following
10 implementation of the approved work plan if contamination has not been completely delineated.
11 Order, pp. 8–9 (Requirements 1–6).

12 **IV. DATE OF THE REGULATORY ACTION**

13 The Order is dated August 21, 2026, and was signed by Assistant Executive Officer Russ
14 Colby. Order, p. 12.

15 The petition must be received by the State Board no later than 5:00 p.m. on Monday,
16 September 21, 2026. California Code of Regulations. title 23, section 2050, subdivision (b).
17 Halliburton submits this petition within that period.

18 **V. STATEMENTS OF REASONS WHY THE REGIONAL BOARD’S ACTION WAS** 19 **INAPPROPRIATE AND IMPROPER**

20 The Order relies on an unsupported conclusion that some limited evidence of historical
21 Baroid activities at one parcel, based on reports that have not even been provided to Halliburton,
22 require Halliburton to conduct a broad, open-ended investigation of the entire multi-parcel Site
23 and vicinity. Water Code section 13267 does not require the Regional Board to prove ultimate
24 cleanup liability before ordering an investigation, but it does require the Regional Board to
25 explain why the investigation reports demanded from Halliburton are needed and why the burden
26 of conducting this broad investigation bears a reasonable relationship to the expected benefit. The
27 Order does not make that showing as to Halliburton. The Regional Board’s own findings included
28 in the Order identify multiple historical operations, substantial prior remediation, neighboring

1 contamination, and a possible regional chlorinated solvent plume from multiple off-site sources.
2 Yet the Order does not define or limit Halliburton's obligations. As detailed below, the Regional
3 Board's Order violates Water Code section 13267, is unsupported by the record, is arbitrary,
4 capricious, and in violation of law and policy.

5 **A. Background**

6 **1. The Order addresses a multi-source Site with decades of operations and**
7 **prior remediation unrelated to Halliburton.**

8 Patagonia currently owns the Site, which has supported a wide range of present and
9 historical uses, including retail and office functions, plastics and construction activities,
10 petroleum fueling and distribution, and Baroid's operations. Order, pp. 1–4 (Findings 1–4). The
11 Main-Olive portion of the Site, at 210 West Main Street and 43 South Olive Street, formerly
12 supported petroleum operations involving numerous underground and aboveground storage tanks
13 and documented hydrocarbon contamination associated with those operations. The Order also
14 identifies detection of PCE, tank removals, soil excavation, and soil and groundwater
15 remediation, all of which are not specifically related to Baroid and resulted in a remedial action
16 completion certification in 2013 for the petroleum at 210 West Main Street. *Id.* at pp. 2, 4–5
17 (Findings 3, 4(c)).

18 **2. The evidence relating to Baroid is limited, location-specific, and not**
19 **clearly differentiated from other operators.**

20 The evidence specific to Baroid concerns discrete historical activities and locations.
21 Finding 4(a) recounts a 1992 Phase II Site Assessment Report that attributed halogenated solvent
22 contamination to historical runoff and leakage during operations involving Baroid, Looman
23 Distributing, and others. Finding 4(b) identifies a reported spill near the loading dock at 59 South
24 Olive Street, historical chemical storage north of 259 West Santa Clara Street, an excess storage
25 yard, 1985 soil sampling, and removal of a 550-gallon underground tank. The same finding
26 merely recounts a consultant's belief that Baroid and other hydrocarbon distributors contributed
27 organic contaminants to the Lost Arrow property. Order, pp. 2–4 (Finding 4(b)).
28

1 Despite this broader site activity, the Order names only Patagonia and Baroid as suspected
2 dischargers, even though its own findings identify other historical operators and potential sources
3 within and adjacent to the Site. This history speaks directly to whether Halliburton should be
4 required to investigate contamination throughout the entire Site based on evidence concerning
5 Baroid's more limited historical activities.

6 **3. The Regional Board's own groundwater findings point to multiple**
7 **potential sources rather than a single Baroid source.**

8 The Order's groundwater analysis describes concentration and groundwater-flow data that
9 suggests that portions of the neighboring Texaco property may be affected by upgradient or cross-
10 gradient sources. Order, pp. 5–6 (Findings 4(d)–(e)). It further posits that fluctuating
11 concentrations of PCE and TCE at nearby properties “indicat[e] that there may be a regional
12 chlorinated solvents plume from multiple off-site sources.” *Id.* at p. 6 (Finding 4(f)).

13 These findings should temper the scope of Halliburton's investigation. Where the
14 Regional Board identifies multiple potential sources of contamination, Halliburton's investigation
15 should be tailored to determine whether and how Baroid's specific operations contributed to Site
16 conditions. Halliburton should not be obligated to investigate and delineate contamination
17 throughout the entire Site and nearby vicinity.

18 **4. Despite uncertainty as to the sources, the Order requires information**
19 **gathering and a broad investigation on the same initial schedule.**

20 The Order requires historical reports, operational information, and chemical handling
21 information by October 20, 2026. The work plan for the site investigation is due the same day. It
22 must address VOCs and other contaminants in soil, soil vapor, and groundwater, including
23 installation of an adequate number of probes and wells at the Site and vicinity. Order, p. 8
24 (Requirements 1–4). Requirement 6 extends the obligation beyond the initial work plan.
25 Following implementation, additional investigations must continue until the vertical and lateral
26 extent of contamination originating from the Site is adequately defined on and off the Site. *Id.* at
27 p. 9 (Requirement 6).

1 This is all required without allowing sufficient time for Halliburton to evaluate the
2 information demanded by the Regional Board, nor has the Regional Board provided any of the
3 reports or data cited in the Order to Halliburton. In fact, this Order is the first time the Regional
4 Board has contacted Halliburton about this Site. Although the Regional Board estimates report
5 costs of \$5,000 to \$30,000 and investigation costs of \$10,000 to \$300,000, depending on the
6 number and depth of sampling locations and the methods employed, *Id.* at, p. 7 (Finding 8), the
7 Regional Board has no idea how much this investigation will cost since it has neither received
8 any information from Halliburton, nor has Halliburton provided any scope for the investigation.

9 **B. Section 13267 requires the Regional Board to tie the investigation to the**
10 **evidence and the burden imposed.**

11 Water Code section 13267 gives the Regional Board broad investigatory authority but not
12 unlimited discretion. The Regional Board must identify the evidence supporting the reports
13 demanded. *Sweeney v. Cal. Reg'l Water Quality Control Bd.*, 61 Cal.App.5th 1093, 1114 (2021)
14 (requiring the Regional Board to “identify the evidence that supports requiring that person to
15 provide the reports”). The burden, including costs, must bear a reasonable relationship to the need
16 for the reports and their anticipated benefits. Water Code section 13267, subdivision (b)(1).

17 The State Board has applied these limits by modifying monitoring requirements despite
18 finding that monitoring was warranted. *In re Pacific Lumber Co. & Scotia Pacific Co. LLC*,
19 October 18, 2001, Cal. State Water Res. Control Bd., Order WQ 2001-14 (eliminating suspended-
20 sediment monitoring where “there was little evidence presented on additional benefits of
21 monitoring suspended sediment” and concluding that additional monitoring stations were “not
22 necessary”). The State Board has also remanded monitoring requirements whose scope lacked an
23 adequate explanation. *In re Petitions of Napa Sanitation Dist., Bay Area Clean Water Agencies,*
24 *& San Francisco BayKeeper*, Dec. 5, 2001, Cal. State Water Res. Control Bd., Order No. WQ
25 2001-16 (directing findings “clarifying the scope of the year-round monitoring requirement and
26 the rationale for it”).

27 State Board Resolution No. 92-49 reinforces the limitations on the Regional Board. In
28 deciding whether to require an investigation, the Regional Board must consider not only historical

1 operations and chemical use, but also the Site’s relationship to other potential sources and
2 relevant hydrogeologic information, and it must make a reasonable effort to identify the entities
3 associated with the discharge. State Water Resources Control Bd., Resolution No. 92-49, *Policies*
4 *and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code*
5 *Section 13304*, section I, subdivisions (A)–(C), as amended Apr. 21, 1994 and Oct. 2, 1996
6 (“Resolution 92-49”). The required investigation must follow from those findings.

7 **C. The Order does not justify requiring Halliburton to investigate**
8 **contamination throughout the Site and vicinity.**

9 The Order’s evidence concerning Baroid identifies particular historical operating and
10 storage areas. Requirements 4 and 6 nevertheless extend Halliburton’s obligations to VOCs and
11 other contaminants throughout the Site and vicinity and require continued investigation until
12 contamination originating from the Site is delineated. Order, pp. 3–4 (Finding 4(b)); pp. 8–9
13 (Requirements 4, 6). The Order does not explain why the evidence concerning Baroid warrants
14 that broader obligation, particularly given its account of other industrial operations and a possible
15 regional chlorinated solvent plume. *Id.* at pp. 4–6 (Findings 4(c)–(f)).

16 Those other potential sources are relevant to the investigation’s design. *See* Resolution 92-
17 49 at section I, subdivision (A)(2)–(3) (identifying “[s]ite characteristics and location in relation
18 to other potential sources of a discharge” and “[h]ydrologic and hydrogeologic information, such
19 as differences in upgradient and downgradient water quality,” as relevant evidence).

20 The initial information requests present a similar problem. Requirements 1 through 3 seek
21 environmental reports and descriptions of current and historical operations and chemical handling
22 throughout the Site, including activities of the current owner and other operators. Order, pp. 1–2
23 (Findings 1–3); p. 8 (Requirements 1–3). Those requests should identify the information
24 reasonably sought from Halliburton concerning Baroid’s operations and distinguish it from
25 information concerning other entities. The continuing obligation under Requirement 6 should
26 likewise be reconsidered as the investigation identifies the sources and extent of contamination.
27 The existence of several properties within the defined Site does not explain why Halliburton must
28 investigate all contamination originating within those boundaries.

1 **D. A phased investigation is appropriate to identify information gaps before**
2 **broader work is required.**

3 Resolution 92-49 provides for investigation in a “progressive sequence,” ordinarily
4 beginning with a preliminary site assessment to “confirm the discharge and the identity of the
5 dischargers.” It then contemplates soil and water investigation sufficient to determine the source,
6 nature, and extent of the discharge. Resolution 92-49, section II, subdivision (A)(1)(a)–(b). The
7 policy also identifies as a cost-effective initial assessment technique the use of historical
8 photographs and records to “focus investigative activities on locations and wastes or materials
9 handled at the site.” *Id.* at section III, subdivision (D)(1)(a). The policy permits adjustments for
10 site conditions and does not require the same sequence in every case. *Id.* at section II, subdivision
11 (A)(1) (“the sequence shall be adjusted to accommodate site-specific circumstances, if
12 necessary”).

13 A focused initial phase is appropriate. The Regional Board relies on historical reports and
14 correspondence to connect Baroid to the Site. Those materials must be provided to Halliburton
15 and should be evaluated with reasonably available operational and corporate records and any
16 other relevant information to identify the work needed to evaluate the suspected Baroid releases
17 and distinguish that work from a broader source investigation.

18 Here, the historical submissions and the investigation work plan are due on the same date.
19 Order, p. 8 (Requirements 1–4). That schedule requires Halliburton to design the field
20 investigation before the Regional Board evaluates the information it has requested. A revised
21 order should first provide for review of the reports cited in the Order, reasonably available Baroid
22 records, and existing Site and neighboring groundwater data.

23 Halliburton requests that available information be used to define its obligations. The
24 Regional Board can preserve any necessary protective measures and require further investigation
25 where the evidence supports it. It should thoroughly explain any determination that concurrent
26 field work is necessary before historical and source information can be evaluated.

1 **VI. MANNER IN WHICH HALLIBURTON IS AGGRIEVED**

2 The Order names Halliburton as a suspected discharger and requires it to produce sitewide
3 information, design a multi-media investigation, and undertake additional work until
4 contamination originating from the Site is delineated. These obligations require expenditures and
5 technical commitments before the Regional Board has adequately defined the work reasonably
6 associated with the suspected Baroid releases. The Order also provides for enforcement
7 consequences if the required submissions are not made. Order, pp. 8–9 (Requirements 1–7).

8 Halliburton is aggrieved by the imposition of these obligations in their present form. Its
9 objections concern both the basis for requiring the work from Halliburton and the scope,
10 sequence, and burden of that work.

11 **VII. STATE BOARD ACTION REQUESTED**

12 As discussed above, Halliburton respectfully requests that the State Board rescind the
13 Order as applied to Halliburton. Alternatively, Halliburton requests that the Order be modified to
14 require a phased approach: First, the Regional Board provides to Halliburton all information it
15 relies on in the Order and Halliburton produces reasonably available information concerning
16 Baroid’s historical operations. Subsequently, the Regional Board evaluates that information
17 together with existing Site and neighboring property data to tailor any investigatory requirements.
18 Halliburton further requests a hearing and an immediate stay of the Order as applied to
19 Halliburton. After the stay request is resolved, Halliburton requests that the petition be held in
20 abeyance so the parties may attempt to resolve whether the Order should be withdrawn or how it
21 should be modified.

22 **VIII. STATEMENT OF POINTS AND AUTHORITIES**

23 For purposes of this protective filing, Section V constitutes Halliburton’s statement of
24 points and authorities. Halliburton reserves the right to file a Supplemental Statement of Points
25 and Authorities. Halliburton also reserves its right to supplement its request for a hearing to
26 consider testimony, other evidence, and argument.
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1 **IX. SERVICE ON THE REGIONAL BOARD AND OTHER DISCHARGER**

2 A copy of this petition, the abeyance request, the stay application, and all supporting
3 exhibits is being served on the Los Angeles Regional Water Quality Control Board and
4 Patagonia, the other entity named in the Order. California Code of Regulations, title 23, section
5 2050, subdivision (a)(8).

6 The Regional Board's address is 320 West Fourth Street, Suite 200, Los Angeles,
7 California 90013. The Order identifies Stephanie Burns as the case contact. Patagonia's address
8 in the transmittal letter is 259 West Santa Clara Street, Ventura, California 93001. Order, pp 1-2
9 (Letter); pp. 8–9 (Requirement 5).

10 **X. REQUEST TO HOLD PETITION IN ABEYANCE**

11 Pursuant to California Code of Regulations, title 23, section 2050.5, subdivision (d),
12 Halliburton requests that the petition be held in abeyance after the State Board resolves the stay
13 request, or after a written Regional Board modification or extension otherwise addresses the
14 immediate compliance obligations. Abeyance would permit Halliburton and Regional Board staff
15 to discuss the historical information, the basis for the Order, and an appropriate investigation.
16 This request is being provided to the Regional Board and Patagonia with the petition. Halliburton
17 does not request abeyance in lieu of substantive relief sought in this petition; rescission remains
18 Halliburton's primary requested relief with modification as the alternative.

19 **XI. REQUEST FOR STAY**

20 Halliburton requests the State Board immediately stay the Regional Board's Order as
21 applied to Halliburton pending resolution of this petition or until the Regional Board provides
22 written relief from the imminent compliance obligations. Pursuant to the California Code of
23 Regulations, title 23, section 2053, subdivision (a), a petitioner must allege facts and produce
24 proof of: (1) substantial harm to petitioner or to the public interest if a stay is not granted; (2) a
25 lack of substantial harm to other interested persons and to the public interest if a stay is granted;
26 and (3) substantial questions of fact or law regarding the disputed action. Petitioner's burden to
27 demonstrate substantial harm must be relevant to the time the petition is under review. *In re*
28 *Boeing Co.*, June 21, 2006, Cal. State Water Res. Control Bd., Order WQ 2006–0007 at 4 (“the

1 issue of whether a stay is appropriate must be judged in the temporal sense—[petitioner] must
2 prove that it will suffer substantial harm if a stay is not granted for the period of time pending
3 resolution of the petition on the merits.”) While a stay is considered an extraordinary relief, the
4 State Board has acknowledged that “substantial cost alone may meet the first prong of a stay
5 determination if the requesting party shows that it constitutes substantial harm.” *In re Ocean Mist*
6 *Farms & RC Farms*, Sept. 19, 2012, Cal. State Water Res. Control Bd., Order WQ 2012-0012 at
7 4.

8 **A. Halliburton will suffer substantial harm without interim relief.**

9 Requirement 4 requires Halliburton to design a broad investigation of several properties,
10 environmental media, and potential sources before the Regional Board has evaluated the
11 historical submissions due on the same date. That sequencing forces Halliburton to make
12 consequential technical and financial commitments to prepare a plan that includes sampling
13 locations, analytes, methods, and new monitoring installations without knowing whether the
14 Regional Board will agree that those commitments are tied to the evidence concerning Baroid. If
15 the petition is successful, much of the work could require substantial redesign or prove
16 unnecessary.

17 The Regional Board’s estimates show that the Order contemplates a material investigative
18 undertaking. Although the costs could be substantially underestimated as the Regional Board does
19 not yet know the scope of the investigation, the Order contemplates investigation costs ranging up
20 to \$300,000. Order, p.7 (Finding 8). A limited stay would permit the scope questions to be
21 resolved before Halliburton incurs expenditures on work that may require material revision while
22 preserving the Regional Board’s ability to require appropriately tailored work once the scope
23 questions are resolved.

24 **B. The public will not be substantially harmed if a stay is granted.**

25 The public will not be substantially harmed by a temporary stay limited to Halliburton.
26 Such a stay would leave Patagonia’s obligations under the Order unchanged and would not
27 prevent the Regional Board from taking future appropriate action concerning the Site. The Order
28 does not identify an imminent or site-specific risk that would be exacerbated by temporarily

1 deferring Halliburton's work while the scope of its investigative obligations is reviewed. A pause
2 to determine the proper scope of Halliburton's obligations will promote an efficient investigation
3 by avoiding duplicative or misdirected work.

4 **C. The petition presents substantial questions of fact and law.**

5 The petition presents substantial questions concerning whether the evidence identified in
6 the Order supports the scope of Halliburton's obligations under Requirements 4 and 6 and
7 whether requiring the historical submissions and investigation work plan on the same date
8 satisfies Water Code section 13267's reasonable-relationship requirement. Section V explains
9 those issues, supported by State Board precedent concerning modification of unnecessary or
10 insufficiently explained monitoring requirements. A stay would permit review before Halliburton
11 must commit to an investigation whose scope it disputes.

12 **XII. ISSUES PRESENTED TO THE REGIONAL BOARD**

13 Halliburton first received notice of this matter through the Order and has not had an
14 opportunity to present these objections. Halliburton raises those objections in this petition and
15 requests rescission or modification and an immediate stay to provide an opportunity to discuss
16 with the Regional Board.

17 **XIII. CONCLUSION**

18 The Order raises a question as to Baroid's historical activities but it does not explain, as it
19 must, why that evidence warrants making Halliburton responsible at the outset for investigating
20 the entire Site and vicinity or for delineating all contamination originating from the Site. The
21 Regional Board itself recognizes in the Order that multiple historical operators, neighboring
22 contamination, and a possible regional chlorinated solvent plume from multiple off-site sources
23 contributed to the Site contamination. Water Code section 13267 requires the Regional Board to
24 tie the investigatory reports demanded from Halliburton to the evidence supporting those
25 demands and to the need and benefit of the work. The Order as currently written does not do so.

26 Halliburton therefore respectfully requests that the State Board rescind the Order as
27 applied to Halliburton or in the alternative, to modify it to require the focused, appropriately
28 sequenced investigation supported by the evidence and required under Water Code section 13267

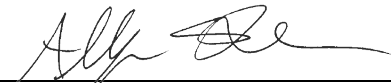
1 and Resolution 92-49. Halliburton further requests a hearing, an immediate stay of the Order as
2 applied to Halliburton and abeyance following resolution of the immediate compliance issues

3 For the foregoing reasons, Petitioner respectfully requests that the State Board grant the
4 relief requested herein.

5
6 Dated: September 21, 2026

BEVERIDGE & DIAMOND PC

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9 By:



ALLYN L. STERN

10 Attorney for Petitioner
11 HALLIBURTON
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Exhibit A



Los Angeles Regional Water Quality Control Board

August 21, 2026

Patagonia Works fka Lost Arrow Corporation
259 West Santa Clara Street
Ventura, CA 93001

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO.: 9589 0710 5270 0416 9456 95

Halliburton Company
3000 N Sam Houston Pkwy E
Houston, TX 77032

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO.: 9589 0710 5270 0416 9463 95

SUBJECT: REQUIREMENT FOR TECHNICAL REPORT PURSUANT TO CALIFORNIA WATER CODE SECTION 13267 ORDER NO. R4-2026-0003

SITE: PATAGONIA WORKS, 210, 230, AND 280 WEST MAIN STREET, 43 AND 59 SOUTH OLIVE STREET, 235 AND 259 WEST SANTA CLARA STREET, VENTURA, CALIFORNIA (SCP NO. 1666, GLOBAL ID NO. T10000024141)

Dear Patagonia Works and Halliburton Company:

The California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board) is the public agency with the primary responsibility for the protection of ground and surface water for all beneficial uses within major portions of Los Angeles and Ventura counties, including the above-referenced site (Site). To accomplish this, the Los Angeles Water Board issues investigative orders authorized by the Porter-Cologne Water Quality Control Act (California Water Code [CWC], Division 7).

Enclosed is a California Water Code section 13267 Order No. R4-2026-0003 (Order) requiring Patagonia Works, fka Lost Arrow Corporation and Halliburton Company to submit technical reports, including a work plan to investigate groundwater, soil, and soil vapor at the Site. This Order is issued to you due to suspected discharges at the Site, as explained in more detail in the attached Order. You have been identified as a suspected discharger, which is also explained in more detail in the attached Order.

DAVID NAHAI, CHAIR | SUSANA ARREDONDO, EXECUTIVE OFFICER

If you have any questions regarding this letter or the enclosed Order, please contact Ms. Stephanie Burns, Water Resource Control Engineer at (213) 576-6718 or via email at stephanie.burns@waterboards.ca.gov or contact Mr. Joshua Cwikla, supervisor of Site Cleanup Program Unit I, at (213) 576-6735 or by email at joshua.cwikla@waterboards.ca.gov.

Sincerely,

 Digitally signed
by Russ Colby
Date: 2026.08.21
10:53:51 -07'00'

Russ Colby
Assistant Executive Officer

Enclosure: Investigative Order No. R4-2026-0003

cc: Mr. Dale R. Pelch, Hahn & Hahn LLP

INVESTIGATIVE ORDER NO. R4-2026-0003

**CALIFORNIA WATER CODE SECTION 13267 ORDER
ORDER TO PROVIDE A TECHNICAL REPORT FOR SUBSURFACE
INVESTIGATION**

**DIRECTED TO
PATAGONIA WORKS, FKA LOST ARROW CORP.**

HALLIBURTON COMPANY

PATAGONIA WORKS

210, 230, AND 280 WEST MAIN STREET, VENTURA, CA 93001

43 AND 59 SOUTH OLIVE STREET, VENTURA, CA 93001

235 AND 259 WEST SANTA CLARA STREET, VENTURA, CA 93001

(SCP NO. 1666)

**ON
AUGUST 21, 2026**

The California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board) makes the following findings and issues this Order pursuant to California Water Code section 13267 requiring Patagonia Works, formerly known as (fka) Lost Arrow Corporation and Halliburton Company to further investigate the site located at 210, 230, and 280 West Main Street; 43 and 59 South Olive Street; and 235 and 259 West Santa Clara Street, Ventura, CA 93001 (the Site).

1. The Site, also known as the "Main Campus", is located in a mixed commercial and industrial area of Ventura. The Site is currently developed with offices, retail sales, on-Site employee childcare (259 West Santa Clara and 280 West Main Street), a parking area (230 West Main Street), a surfboard shaping, wetsuit repair, and sewing room in the Quonset Hut building (59 South Olive Street), and the "Main-Olive Property", which is currently used as a parking area and surf shop known as Fletcher Chouinard Designs (210 West Main Street and 43 South Olive Street). Patagonia Works headquarters is also currently located at 259 West Santa Clara Street, and the Patagonia clothing store is located at 235 West Santa Clara Street in the Great Pacific Iron Works building. The Site is currently owned by Patagonia Works (Patagonia), formerly known as Lost Arrow Corp (LAC).
2. According to the *Final Report on the Health and Safety Investigations of Potential Soil Contamination at the Lost Arrow Corporate Headquarters Building and the Great Pacific Child Development Center*, dated June 2, 1987, prepared by Woodward-Clyde Consultants (WCC) and submitted to the Ventura City Fire Department (VCFD), the Site was all under one address (209 West Santa Clara Avenue) until 1963. At that

time, the three buildings on the western boundary of the Site became occupied by Ventura Laminated Plastics, a formica workshop, which used 245 West Santa Clara Avenue as its address. In 1974, that address was taken over by Landberg Construction Company for two years before it became part of Great Pacific Iron Works, which became known as LAC in 1984, and used 235 West Santa Clara Street as its address. LAC is now known as Patagonia.

3. Activities at the Site historically included petroleum fueling operations (gasoline and diesel) and lubricant mixing and distribution by General Petroleum at the Main-Olive Property until March 29, 2002, when the property was sold to LAC. Twenty fuel/waste oil underground storage tanks (USTs) of various sizes were removed from the Main-Olive Property from September 1998 through June 1999, and four 12,000-gallon fuel USTs were removed from the site in August 2002. The 210 West Main Street property received a "Remedial Action Completion Certification" from the County of Ventura Resource Management Agency for petroleum releases on August 12, 2013, after completion of a site investigation and corrective action for the USTs.

According to the Chemical Use Questionnaire (CUQ), submitted to the Los Angeles Water Board on September 10, 2014 by Patagonia, present operations at the Site include common household/bathroom/kitchen cleaning materials and office supply storage, retail sales, Patagonia headquarters, and employee childcare (280 West Main Street, 235 West Santa Clara Street, and 259 West Santa Clara), surfboard shaping, wetsuit repair, and a sewing room at the Quonset Hut building (59 South Olive Street), Fletcher Chounard Designs (43 South Olive Street), a parking area (230 West Main Street), and the Main-Olive Property, which is currently being used as a parking area. According to the Safety Data Sheets for AquaSEAL 1400XE Gloss, Styrofoam™ 6.50x24 Butt Edge Surfboard NFR Core Extruded Foam Board, and Stabond 0836, provided with the CUQ, chemicals used at 59 South Olive Street for wetsuit repair, surfboard shaping, and sewing included n-methylpyrrolidone, isopropyl alcohol, styrene polymers, methyl ethyl ketone, hexane, toluene, and cyclohexane.

4. Environmental sampling data suggests that there is or has been a discharge of waste at or from the Site that has affected the quality of waters of the State.
 - a. According to the *Phase II Site Assessment Report*, dated November 4, 1992, prepared for Texaco E&P, Inc. (Texaco E&P) and submitted by West Coast Environmental (WCE), LAC began investigations of potential soil and groundwater contamination in 1985 at 235 and 259 West Santa Clara Street to assess possible releases from past oil field and petrochemical operations on LAC and adjacent properties. Halogenated solvent contamination was found on the property and was determined to be from past surface runoff and leakage during the oil field and petrochemical operations at the adjacent 59 South Olive

Street property by N.L Baroid/NL Industries, Inc. (Baroid), Looman Distributing, and two other distributors. Three USTs were removed from the northern end of the 235 West Santa Clara Street property in 1986 and groundwater wells were installed. The solvents that were discovered at the Texaco E&P monitoring wells, located at 133 West Santa Clara Street, Ventura, were also detected in the LAC wells, located upgradient, at higher concentrations, indicating that LAC may be closer to the source (Attached Figure 1). Petroleum distribution facilities were located on both sides of Olive Street and former employees indicated that a common practice was to clean the facility and rinse empty drums with water or solvent, allowing the wash water to run off to soil. According to environmental assessments conducted by Holguin & Associates (Holguin) in 1986 and WCC in 1987, solvents detected at the LAC wells included chloroethane, 1,1-dichloroethane, 1,1-dichloroethene, trans-1,2-dichloroethene, tetrachloroethene (PCE), 1,1,1-trichloroethane, trichloroethene (TCE), vinyl chloride, freon-TF, and 2-Butanone.

- b. In 1985, Baroid was questioned regarding their handling and storage of hazardous materials at the 59 South Olive Street property. There had evidently been a spill in the back of the facility near the loading dock and LAC's consultants, Holguin, believed that many of the organic contaminants at LAC were from Baroid and the other hydrocarbon distribution companies in the area. According to the *Interim Report and Proposed Modification to Contract*, dated January 8, 1985, Holguin acquired historical aerial photographs from Whittier College and Wilvert-Pencek, Inc., dated August 7, 1979 and October 28, 1970, which showed that Baroid used to occupy property that was used as a chemical storage area for drums, tanks, and pallets of material, which was later used as a parking area immediately in front (north) of LAC's corporate headquarters building (259 Santa Clara Street). On August 15, 1985, Baroid responded to the County of Ventura Resource Management Agency's requirement for soil assessment and soil cleanup and noted that they would collect two composite soil samples (0-4 inch depth and 1-1.5 inch depth), two control samples for comparative analysis, and submit a soil cleanup and UST removal plan if soil contamination was present. Baroid completed the composite soil sampling on August 19, 1985, although the County of Ventura Resource Management Agency required Baroid to reanalyze the composite samples individually, resample the storage area, and remove and dispose of all contaminated soil on the property. On October 2, 1985, VCFD issued a letter to Baroid containing requirements for the storage and handling of chemicals on the property, which included obtaining a Hazardous Materials permit, removing the flammable liquids UST from the rear yard of the property, and sampling and removal of

contaminated soil in order to remove the UST. VCFD also noted that Baroid was occupying a lot on Santa Clara Street (259 Santa Clara Street) as an excess storage yard and stated that "our investigation has revealed further improper storage practices on this lot. Spills have been observed by members of this Department" and "be advised that the City of San Buenaventura Fire Department is fully prepared to request the office of the City Attorney to initiate appropriate legal action if you are not in compliance with our necessary and reasonable requests by November 18, 1985." Baroid had a 550-gallon UST removed from the property in 1985, and, according to a Holguin correspondence dated October 26, 1985, the results from Baroid's October 7, 1985 soil sampling event indicated the presence of significant concentrations of contaminants. It was noted that multiple hazardous chemicals, including oxyethylated alkylphenol, paraformaldehyde powder, chlorinated phenol, isopropyl alcohol, microbicide, methanol, kerosene, caustic soda (NaOH), hexavalent chromium, ferrochrome, isopropanol, and zinc were stored on the property. On January 22, 1994, Baroid was acquired by Dresser Industries Inc. Dresser Industries became part of Halliburton Company through a merger that was finalized on April 1, 1998, and the combined company operates under the Halliburton name.

- c. At the 210 West Main Street and 43 South Olive Street properties, located at the southwest corner of the West Main Street and Olive Street intersection, GP Resources and Looman Distributing (later known as Chemsol Distributing, Inc.) operated 24 USTs and numerous above ground storage tanks. Holguin and O&E Associates (O&E) both performed soil vapor surveys at the properties in 1990, and O&E also completed a groundwater assessment in November 1990. These assessments detected a plume of hydrocarbons in the groundwater, concentrated in the pump locations, which extended off-site to the north, east, and southeast. Benzene, toluene, and lead were detected in the groundwater at levels exceeding state drinking water standards, although no solvent or halogenated hydrocarbon testing was reported during these assessments. However, numerous unidentified peaks were recorded during soil vapor benzene, toluene, ethylbenzene, and xylenes analyses by a field photoionization detector. At VCFD's request for additional assessment at the site, four monitoring wells were installed and hydrocarbon contamination was detected in soil and groundwater. No solvents or halogenated hydrocarbon analyses were performed for soil or groundwater samples during these assessments. In 1998, Applied Environmental Technologies performed chemical analysis for chlorinated solvents which detected PCE in samples taken from groundwater monitoring wells MW-1 (5.7 micrograms per liter

[µg/L]), MW-2 (283 µg/L), MW-3 (54.3 µg/L), and MW-4 (8.6 µg/L), all of which exceeded the maximum contaminant level (MCL) of 5 µg/L. In September 1998, six USTs were removed, which consisted of two 12,000-gallon USTs and one 10,000-gallon UST used to store diesel fuel, two 12,000-gallon USTs used to store gasoline, and one 5,000-gallon UST used to store waste oil. After removal of the six USTs, four new double-walled 12,000-gallon USTs were installed in December 1998. In January 1999, one fuel dispenser and three USTs were removed from the northeastern portion of the site, which consisted of two 5,000-gallon USTs used to store diesel fuel and one 3,000-gallon UST used to store gasoline and/or diesel fuel. In May and June 1999, four USTs were removed from the northwestern portion of the site, which consisted of one 10,000-gallon UST used to store diesel fuel and three 10,000-gallon USTs used to store gasoline, and seven USTs were removed from the southeastern portion of the site, which consisted of one 6,000-gallon UST used to store diesel fuel, four 8,000-gallon USTs used to store gasoline, one 8,000-gallon UST used to store waste oil, and one 6,000-gallon UST used to store isopropyl alcohol. In August 2002, the four double-walled 12,000-gallon USTs previously installed in December 1998 were removed by GP Resources under the supervision of VCFD. Impacted soils were excavated during the UST removal actions, which resulted in the removal of approximately 14.325 tons of soil. From 2006 to 2007, Padre Associates, Inc. (Padre) performed fuel-hydrocarbon impacted soil and groundwater remediation at this former Leaking Underground Storage Tank site using a high vacuum dual phase extraction system, consisting of seven dual phase extraction wells and six air sparge wells, which removed approximately 8,945 pounds of hydrocarbon vapors and the extraction of 825,000 gallons of groundwater. This remedial technology was used until it was no longer feasible to continue due to low inlet concentrations. The remediation was focused mainly on the 210 West Main Street site and likely removed PCE from soil and groundwater, resulting in a reduction in PCE concentrations at the site and immediate surrounding area. The 210 West Main Street site received a "Remedial Action Completion Certification" from the County of Ventura Resource Management Agency for petroleum releases on August 12, 2013.

- d. LAC completed an environmental audit at 235 and 259 West Santa Clara Street which included the construction of three groundwater monitoring wells (MW#1 through MW#3). WCC collected groundwater samples from the wells in February 1987, which contained PCE concentrations up to 2,300 µg/L in MW#3. Higher PCE concentrations at MW#3 and documented groundwater flow directions of south to southeast suggests that PCE concentrations in

groundwater at the Texaco E&P site (133 West Santa Clara Street, Ventura) are being affected by an off-site upgradient or cross-gradient source(s).

- e. Initial concentrations in groundwater at the Texaco E&P site (133 West Santa Clara Street, Ventura) located downgradient/cross gradient of the Site in April 1992 indicated PCE concentrations to be 600 µg/L (MW-1), 190 µg/L (MW-2), 620 µg/L (MW-3), and <0.005 µg/L (MW-4). The PCE impacts to groundwater are greatest at the western portion of the site at the locations of groundwater monitoring wells MW-1 and MW-3R (replacement well for MW-3). The higher PCE concentrations at the locations of off-site groundwater monitoring wells MW#3 and LACGW-2 (now called ABC-1) and hydropunch groundwater sample DH-8B relative to on-site wells MW-1 and MW-3R on the Texaco E&P site, as well as the reported groundwater flow directions of south to southeast, suggest PCE concentrations in groundwater at the southwestern and northwestern portions of the site are being affected by off-site upgradient or cross-gradient source(s).
 - f. The most recent (May 2025) PCE concentrations in groundwater at the Texaco E&P site are 140 µg/L at MW-1, 56 µg/L at MW-2, 6.4 µg/L at MW-3R, and 36 µg/L at MW-4. TCE concentrations at this site ranged from 0.77 µg/L (MW-4) to 64 µg/L (MW-3R). The most recent (April 2025) PCE concentrations in shallow groundwater at the cross-gradient Ventura Muffler and Brake site (150 West Main Street, Ventura) range from 36 µg/L (MW-10S) to 840 µg/L (ABC-2), and 0.59J µg/L (MW-9D) to 510 µg/L (MW-11D) in deep groundwater. TCE concentrations in shallow groundwater ranged from 0.44J µg/L (MW-10S) to 87 µg/L (ABC-2), and 3.2 µg/L (MW-14D) to 26 µg/L (MW-11D) in deep groundwater at the Ventura Muffler and brake site. PCE and TCE concentrations at these adjacent sites continue to fluctuate, indicating that there may be a regional chlorinated solvents plume from multiple off-site sources (Figure 2 and Figure 3).
5. This Order identifies Patagonia Works fka Lost Arrow Corporation and Halliburton Company as suspected dischargers because they own or owned and/or operate or operated the activity that resulted in the discharge of waste or suspected discharge of waste that could affect the quality of waters of the State.
 6. California Water Code section 13267, subdivision (b)(1) states:

“In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or, discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has

discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports."

7. This Order requires the entities named herein to prepare and submit a work plan and technical report(s) to investigate chemicals of concern in groundwater, soil, and soil vapor at the Site. You are expected to submit a complete workplan and technical report(s) as required by this Order. The Los Angeles Water Board may reject the reports if they are deemed incomplete and/or require revisions to the report under this Order.
8. The burdens, including costs, of these reports bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. The information is necessary to protect human health and groundwater quality, which may be impacted from wastes discharged to soil and groundwater as a result of the activities performed at the Site, to adequately determine the extent of discharges of waste at and from the Site, to assure adequate cleanup of the Site, if necessary, and to assure that discharges of waste that could impact water quality will be addressed. These activities all protect human health and the environment. The technical report(s) required by this Order may cost in the range of \$5,000 to \$30,000, depending upon the number and depths of sampling locations. Soil vapor, soil, and groundwater investigation costs are estimated to be in the range of \$10,000 to \$300,000 depending upon the number and depths of sampling locations, and sample collection and testing methodology appropriate for the Site.
9. The issuance of this Order is an enforcement action by a regulatory agency and is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to California Code of Regulations, title 14, section 15321, subdivision (a)(2). This Order requires submittal of work plan(s) and technical report(s). Information collection is exempt from CEQA pursuant to California Code of Regulations, title 14, section 15306. It is unlikely that compliance with this Order, including implementation of the work plans, could result in anything more than minor physical changes to the environment. (Pub. Res. Code § 15061, subd. (b)(3) [common sense exemption].) If the implementation of this Order may result in significant impacts

on the environment, the appropriate lead agency will address the CEQA requirements prior to approval of any work plan.

10. Any person aggrieved by this action of the Los Angeles Water Board may petition the State Water Resources Control Board (State Water Board) to review the action in accordance with California Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Note that filing a petition does not stay the requirements of this Order. Copies of the law and regulations applicable to filing petitions may be found on the Internet at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

THEREFORE, IT IS HEREBY ORDERED that Patagonia Works fka Lost Arrow Corporation and Halliburton Company, pursuant to Water Code section 13267, subdivision (b), is required to complete the following:

1. Submit any environmental assessment reports for the Site that have been produced to date by **October 20, 2026**.
2. Submit a description of current and historical business and facility operations at the site by **October 20, 2026**.
3. Submit management procedures and general practices regarding the handling of on-Site chemicals and any wastes generated during facility operations by **October 20, 2026**.
4. By **October 20, 2026**, submit a work plan to evaluate the extent of volatile organic compounds and other contaminants in the soil, soil vapor, and groundwater beneath the Site, including the installation of an adequate number of soil vapor monitoring probes and groundwater monitoring wells at the Site and vicinity. The work plan shall include the proposed sampling locations, methods, and data quality objectives. The locations of the proposed sampling locations must be presented on a scaled facility map;
5. The above items shall be submitted to:

Ms. Stephanie Burns
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013
Phone: (213) 576-6718

Email: stephanie.burns@waterboards.ca.gov

6. Following the implementation of the approved work plan required in item 4 above, if the vertical and lateral extent of the contamination in soil, soil vapor, and groundwater is not completely delineated, additional investigations shall be conducted until the vertical and lateral extent of the soil, soil vapor, and groundwater contamination originating from the Site is adequately defined both on-site and off-site.
7. Pursuant to Water Code section 13268, subdivision (a), any person who fails to submit reports in accordance with the Order is guilty of a misdemeanor. Pursuant to Water Code section 13268, subdivision (b)(1), failure to submit the required technical report described above by the specified due date(s) may result in the imposition of administrative civil liability by the Los Angeles Water Board in an amount up to one thousand dollars (\$1,000) per day for each day the technical report is not received after the above due date. These civil liabilities may be assessed by the Los Angeles Water Board for failure to comply, beginning with the date that the violations first occurred, and without further warning.
8. Chapter 30, Division 3 of Title 23 of California Code of Regulations (CCR) requires persons responsible for submitting reports to ensure the electronic submission of laboratory analytical data (i.e., soil or water chemical analysis) and locational data (i.e., location and elevation of groundwater monitoring wells) via the Internet to the State Water Resources Control Board's GeoTracker database. The regulations and other background information regarding GeoTracker, and electronic submission of data are available at https://www.waterboards.ca.gov/ust/electronic_submission/.

In accordance with the regulations, you must upload the following information to the State Water Resources Control Board's GeoTracker database: reports and work plans (in PDF format), laboratory analytical data (in electronic data format [EDF]), monitoring event information in GEO_WELL format, an updated site map (GEO_MAP) showing any monitoring well locations, boring logs in PDF (GEO_BORE) to be used to link to well locations, monitoring well latitude and longitude (GEO_XY) survey data, and well elevation data (GEO_Z). EDF files shall be formatted in accordance with current EDF guidance letters available at <https://geotracker.waterboards.ca.gov/edfletters/>.

Vapor and air analytical data collected for vapor intrusion investigations related to the Site should also be uploaded to GeoTracker. Vapor probe and sampling locations not surveyed should be manually entered into GeoTracker. Additionally, vapor intrusion building profile(s) should be created in GeoTracker with the data. Please see the State Water Resources Control Board's August 2019 Guidance on Uploading Vapor Intrusion Information into GeoTracker, available at

https://www.waterboards.ca.gov/water_issues/programs/site_cleanup_program/vapo

[r_intrusion/docs/2020/viesi_guide_v1.pdf](#), for information on uploading vapor data, manually entering in field points and how to create a vapor intrusion building profile.

To comply with the above referenced regulation, you are required to upload all technical reports, documents, and well data to GeoTracker by the due dates specified in the Los Angeles Water Board letters and orders issued to you or for the Site. However, the Los Angeles Water Board may request that you submit hard copies of selected documents and data in addition to electronic submittal of information to GeoTracker. For your convenience, the GeoTracker Global ID for this site is T10000024141.

9. The Los Angeles Water Board, under the authority given by Water Code section 13267, subdivision (b)(1), requires you to include a perjury statement in all reports as required by this Order. The perjury statement shall be signed by a senior authorized company representative (not by a consultant). The perjury statement shall be in the following format:

"I, [NAME], certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

SO ORDERED.

 Digitally signed
by Russ Colby
Date: 2026.08.21
10:54:23 -07'00'

Russ Colby
Assistant Executive Officer

August 21, 2026
Date

Attachments:

- a. Figure 1. Area Map, Phase II Site Assessment Report, November 2, 1992.
- b. Figure 2. Ventura Muffler and Brake Site Map with shallow groundwater gradient, 2Q25.
- c. Figure 3. Texaco E&P Site map.

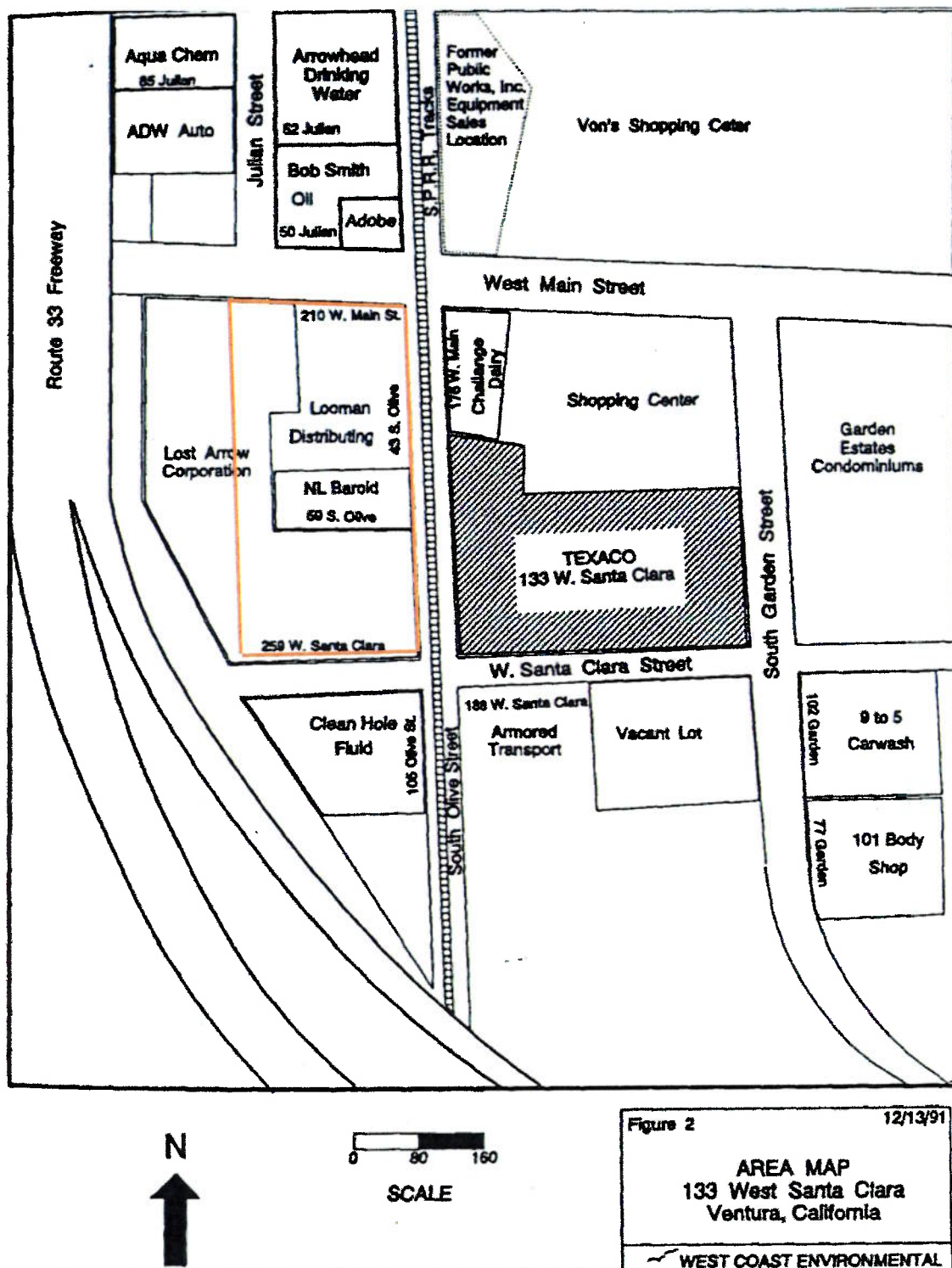
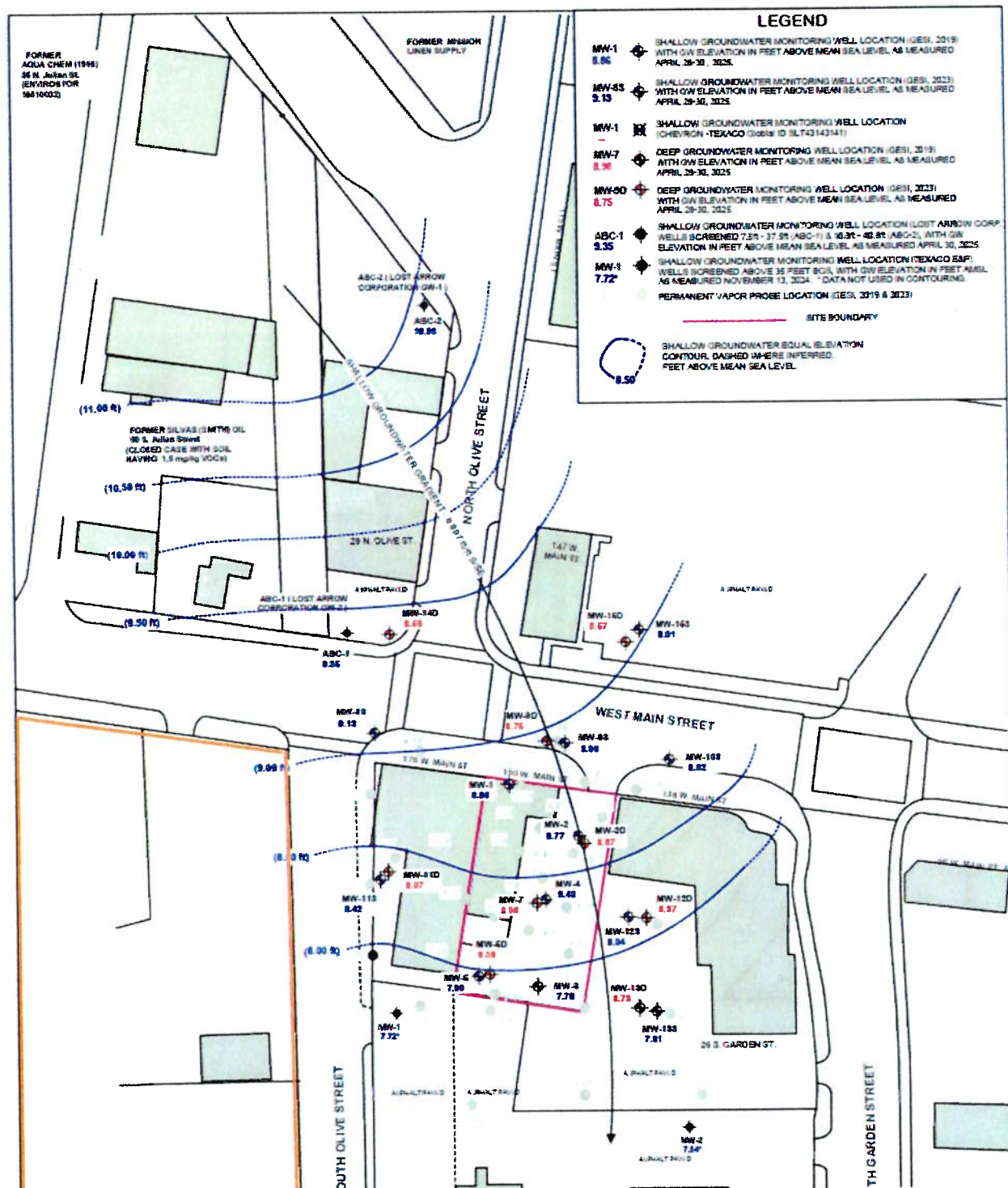


Figure 1. Area Map, Phase II Site Assessment Report, November 2, 1992
(approximate Patagonia Site outlined in orange).



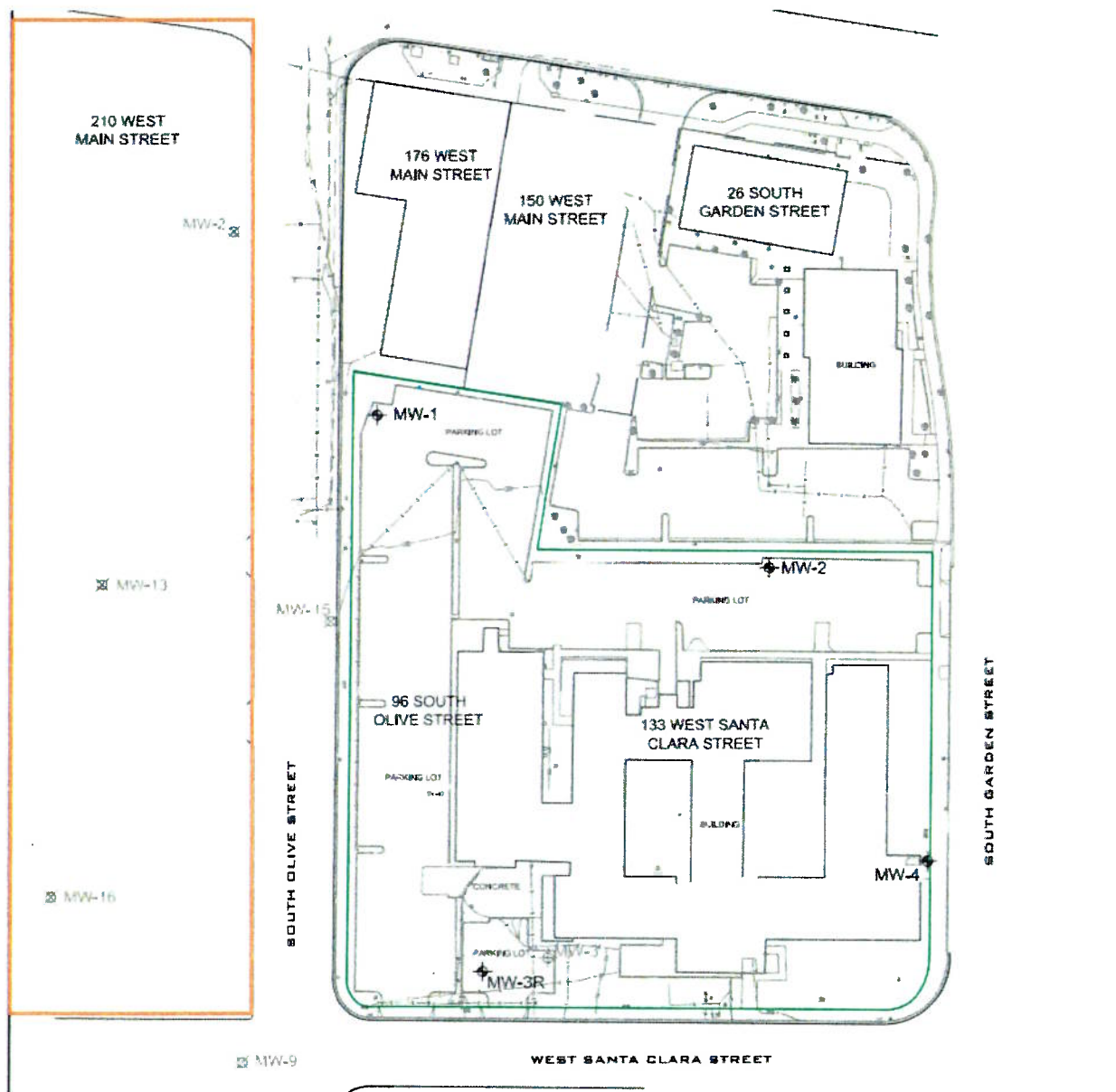


Figure 3. Texaco E&P Site map (approximate Patagonia Site outlined in orange).

PROOF OF ELECTRONIC SERVICE

I, Carlotta G. Datanagan, declare that I am employed in the City of San Francisco; I am over the age of eighteen years and not a party to the within entitled action; my business address is Beveridge & Diamond PC, 333 Bush St #1500, San Francisco, CA 94104. My electronic service notification is CDatanagan@bdlaw.com.

I further declare that on September 21, 2026, I electronically served the following documents:

HALLIBURTON'S PETITION FOR REVIEW; REQUEST FOR HEARING; REQUEST TO HOLD IN ABEYANCE; AND REQUEST FOR STAY

on the interested parties in this action as follows:

State Water Resources Control Board Office of Chief Counsel Adrianna M. Jerome P.O. Box 100 Sacramento, CA 95812-0100 Email: waterqualitypetitions@waterboards.ca.gov	Susana Arredondo, Executive Officer Russ Colby, Assistant Executive Officer Stephanie Burns, Case Contact Los Angeles Regional Water Quality Control Board 320 West 4 th Street, Suite 200 Los Angeles, CA 90013 Email: Susana.Arredondo@waterboards.ca.gov Email: Russ.Colby@waterboards.ca.gov Email: Stephanie.Burns@waterboards.ca.gov
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The documents were served by the following means:

X	<u>BY ELECTRONIC SERVICE:</u> On September 21, 2026, I caused the documents to be sent to the person(s) at the electronic notification address(es) listed above. Within a reasonable time, the transmission was reported as complete and without error.
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Hilary Dessouky, General Counsel Patagonia Works 259 W. Santa Clara Street Ventura, CA 93001 Email: hilary.dessouky@patagonia.com	
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X	<u>BY ELECTRONIC SERVICE:</u> On September 21, 2026, I caused the documents to be sent to the person(s) at the electronic notification address(es) listed above. Within a reasonable time, the transmission was reported as complete and without error.
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1 2 3	X <u>BY CERTIFIED MAIL:</u> I caused such envelope(s) with postage thereon fully prepaid via Certified Mail Return Receipt Requested to be placed in the United States Mail in El Sobrante, California.
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4 I declare under penalty of perjury under the laws of California that the foregoing is true
5 and correct. Executed on September 21, 2026, at El Sobrante, California.

6 By: Carlotta Datanagan
7 Carlotta G. Datanagan
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