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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2021 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

AMPLIFY ENERGY CORP.,
BETA OPERATING COMPANY, LLC,
d/b/a "Beta Offshore," and
SAN PEDRO BAY PIPELINE COMPANY,

Defendants.

CR 8:21-CR-00226-CJC

I N D I C T M E N T

[33 U.S.C. §§ 1321(b) (3),
1319(c) (1) (A): Negligent Discharge
of Oil into the Contiguous Zone of
the United States]

[CLASS A MISDEMEANOR]

The Grand Jury charges:

[33 U.S.C. §§ 1321(b) (3), 1319(c) (1) (A); 18 U.S.C. § 2(b)]

On or about October 1 and 2, 2021, within the Central District
of California, upon the high seas, or elsewhere out of the
jurisdiction of any particular State or district, defendants AMPLIFY
ENERGY CORP., BETA OPERATING COMPANY, LLC, doing business as "Beta
Offshore," and SAN PEDRO BAY PIPELINE COMPANY (collectively,
"defendants") negligently discharged, and caused to be negligently
discharged, oil into the waters of the contiguous zone of the United
States, namely, in the San Pedro Bay approximately 4.7 miles off the

1 coast of Orange County, California, in a quantity that may be harmful
2 to the public health, welfare, and environment of the United States.

3 Specifically, defendants negligently discharged, and caused to
4 be negligently discharged, oil into the waters of the contiguous zone
5 by, among other things:

6 (1) failing to properly respond to eight alarms, at
7 approximately 4:10 p.m., 5:52 p.m., 7:15 p.m., 8:39 p.m., 9:23 p.m.,
8 10:01 p.m., and 11:30 p.m. on or about October 1, 2021, and at
9 approximately 5:28 a.m. on or about October 2, 2021, from the
10 automated leak detection system on the 16-inch San Pedro Bay Pipeline
11 (the "Pipeline") that defendants owned and operated;

12 (2) after the first leak alarm at approximately 4:10 p.m. on or
13 about October 1, 2021, shutting down and restarting the Pipeline five
14 times, from approximately 5:10 p.m. to approximately 10:33 p.m. on or
15 about October 1, 2021, and consequently pumping oil through the
16 Pipeline for an aggregate of more than three hours during that time;

17 (3) restarting and pumping oil through the Pipeline from
18 approximately 11:15 p.m. on or about October 1, 2021, to
19 approximately 2:27 a.m. on or about October 2, 2021, while
20 crewmembers conducted a manual leak detection test;

21 (4) restarting and pumping oil through the Pipeline from
22 approximately 5:11 a.m. to approximately 6:04 a.m. on or about
23 October 2, 2021, in reliance on the inability of non-crewmembers in a
24 boat to locate an oil discharge from the Pipeline in darkness in the
25 middle of the night;

26 (5) operating the Pipeline on or about October 1 and 2, 2021,
27 with crewmembers who had not been provided sufficient training
28 regarding the Pipeline's automated leak detection system; and

1 (6) operating the Pipeline on or about October 1 and 2, 2021,
2 with an understaffed and fatigued crew.

3
4 A TRUE BILL

5 /S/

6 _____
Foreperson

7 TRACY L. WILKISON
United States Attorney

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9
10 SCOTT M. GARRINGER
Assistant United States Attorney
11 Chief, Criminal Division

12 MARK A. WILLIAMS
Assistant United States Attorney
13 Chief, Environmental & Community
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14 MATTHEW W. O'BRIEN
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Crimes Section