## State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez Governor

David Martin Cabinet Secretary

**Tony Delfin** Deputy Cabinet Secretary David Catanach, Director Oil Conservation Division



## \*Response Required - Deadline Enclosed\*

Field Inspection Program "Preserving the Integrity of Our Environment"

18-Jul-16

## GFG OPERATING LLC 4701 TEAKWOOD TRACE MIDLAND TX 79707

**LETTER OF VIOLATION - Inspection** 

Dear Operator:

The following inspection(s) indicate that the well, equipment, location or operational status of the well(s) failed to meet standards of the New Mexico Oil Conservation Division as described in the detail section below. To comply with standards imposed by Rules and Regulations of the Division, corrective action must be taken immediately and the situation brought into compliance. The detail section indicates preliminary findings and/or probable nature of the violation. This determination is based on an inspection of your well or facility by an inspector employed by the Oil Conservation Division on the date(s) indicated.

Please notify the proper district office of the Division, in writing, of the date corrective actions are scheduled to be made so that arrangements can be made to reinspect the well and/or facility.

		INSPECTIO	N DETAII	L SECTION		
TOOMEY Inspection Date	ALLEN No.004 Type Inspection	Inspector	Violation?	J-28-18S-28E *Significant Non-Compliance?	30-015-02097-00-0 Corrective Action Due By:	)0 Inspection No.
07/18/2016	Routine/Periodic Violations	Tony Morales	Yes	No	10/21/2016	iTM1620046500
	Absent Well Identification S General Housekeeping (Rule					
Comments .		Equipment and Location in ON SIGN NOT VISIBLE	Good Shape	. PJ. STAINING AR	OUND WELL HEAD	
TOOMEY Inspection Date	ALLEN No.006 Type Inspection	Inspector	Violation?	I-28-18S-28E *Significant Non-Compliance?	30-015-02099-00-0 Corrective Action Due By:	O Inspection No.
07/18/2016	Routine/Periodic Violations	Tony Morales	Yes	No	10/21/2016	iTM1620045047
	Absent Well Identification Si General Housekeeping (Rule	•				
Comments of	on Inspection: OK. All E	iquipment and Location in G AROUND WELL HEA	•			

TOOMEY ALLEN No.007 Inspection		7		O-28-18S-28E *Significant	30-015-02100-00-00 Corrective		
Date	Type Inspection	n	Inspector	Violation?	Non-Compliance?		Inspection No
07/18/2016	Routine/Peri Violations	odic	Tony Morales	Yes	No	10/21/2016	j <b>TM16200487</b> 8
		ntification Signs eeping (Rule 114					
Comments	on Inspection:	OK. Ali Equ	ipment and Location in G ON LOCATION L	n Good Shape DCATION SI	. PJ. STAINING AF GN NOT VISBLE.	ROUND WELL HEAD	<b>)</b> .
TOOMEY	ALLEN No.00	)9		u	J-28-18S-28E	30-015-02103-00-00	
Inspection Date	Type Inspectio	n	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
07/18/2016	Routine/Peri Violations	odic	Tony Morales	Yes	No	10/21/2016	iTM162004408
	Tank Battery Equipment (Rules 114, 115) Fire Walls and Dikes General Housekeeping (Rule 114)						
Comments	on Inspection:	OK. All Equi	ipment and Location in ENT STAINING TA			ITERY NO	
TOOMEY ALLEN No.008					O-28-18S-28E <b>30-015-06113-00-00</b> *Significant Corrective		
Inspection Date	Type Inspectio	n	Inspector	Violation?	Non-Compliance?	Action Due By:	Inspection No.
07/18/2016	Routine/Peric Violations	odic	Tony Morales	Yes	No	10/21/2016	iTM162004712
	Absent Well Ider General Houseke	+					
Comments	on Inspection:			<b>.</b>			
Comments						OUND WELL HEAD	
	ALLEN No.01	FRESH OIL	DESCRIPTION AND LOCATION IN LOCATION SIGN, NO			30-015-24448-00-0	00
	<u> </u>	FRESH OIL		OT VISIBLE. Violation?			00 Inspection No.
TOOMEY Inspection Date	ALLEN No.01	FRESH OIL	LOCATION SIGN. N	OT VISIBLE.	O-28-18S-28E *Significant	30-015-24448-00-0 Corrective	Inspection No.
TOOMEY Inspection Date	ALLEN No.01 Type Inspection Routine/Peric	FRESH OIL   7 odic eeping (Rule 114	Inspector Tony Morales	OT VISIBLE. Violation? Yes	O-28-18S-28E *Significant Non-Compliance? No	30-015-24448-00-0 Corrective Action Due By: 10/21/2016	Inspection No. iTM1620048494
TOOMEY Inspection Date 07/18/2016	ALLEN No.01 Type Inspection Routine/Peric Violations	FRESH OIL   7 odic eeping (Rule 114	Inspector Tony Morales	OT VISIBLE. Violation? Yes	O-28-18S-28E *Significant Non-Compliance? No	30-015-24448-00-0 Corrective Action Due By: 10/21/2016	Inspection No. iTM1620048494
TOOMEY / Inspection Date 07/18/2016 Comments of	ALLEN No.01 Type Inspection Routine/Peric Violations General Houseke	FRESH OIL 1 7 ndic eeping (Rule 114 OK. All Equi TUBING ON	Inspector Tony Morales	OT VISIBLE. Violation? Yes	O-28-18S-28E *Significant Non-Compliance? No PJ. STAINING AR	30-015-24448-00-0 Corrective Action Due By: 10/21/2016 OUND WELL HEAD 30-015-24484-00-0	Inspection No. iTM1620048494 . OLD
TOOMEY Inspection Date 07/18/2016 Comments of	ALLEN No.01 Type Inspection Routine/Peric Violations General Houseke on Inspection:	FRESH OIL 1 7 ndic eeping (Rule 114 OK. All Equi TUBING ON 8	Inspector Tony Morales	OT VISIBLE. Violation? Yes	O-28-18S-28E *Significant Non-Compliance? No PJ. STAINING AR	<b>30-015-24448-00-0</b> Corrective Action Due By: 10/21/2016 OUND WELL HEAD	Inspection No. iTM1620048494 . OLD
TOOMEY Inspection Date 07/18/2016 Comments Comments FOOMEY Inspection Date	ALLEN No.01 Type Inspection Routine/Peric Violations General Houseke on Inspection: ALLEN No.01	FRESH OIL 1 7 odic weping (Rule 114 OK. All Equi TUBING ON 8	Inspector Tony Morales pment and Location in LOCATION	OT VISIBLE. Violation? Yes Good Shape.	O-28-18S-28E *Significant Non-Compliance? No PJ. STAINING AR I-28-18S-28E *Significant	30-015-24448-00-0 Corrective Action Due By: 10/21/2016 OUND WELL HEAD 30-015-24484-00-0 Corrective	Inspection No. iTM1620048494 . OLD 00 Inspection No.
TOOMEY / Inspection Date 07/18/2016 Comments of FOOMEY / Inspection	ALLEN No.01 Type Inspection Routine/Peric Violations General Houseke on Inspection: ALLEN No.01 Type Inspection Routine/Perio	FRESH OIL 7 a bdic eeping (Rule 114 OK. All Equi TUBING ON 8 dic tification Signs (	Inspector Tony Morales pment and Location in LOCATION Inspector Tony Morales Rule 103)	OT VISIBLE. Violation? Yes Good Shape. Violation?	O-28-18S-28E *Significant Non-Compliance? No PJ. STAINING AR I-28-18S-28E *Significant Non-Compliance?	30-015-24448-00-0 Corrective Action Due By: 10/21/2016 OUND WELL HEAD 30-015-24484-00-0 Corrective Action Due By:	Inspection No. iTM1620048494 . OLD 00 Inspection No.
TOOMEY / Inspection Date 07/18/2016 Comments of FOOMEY / Inspection Date 07/18/2016	ALLEN No.01 Type Inspection Routine/Perio Violations General Houseke on Inspection: ALLEN No.01 Type Inspection Routine/Perio Violations Absent Well Iden General Houseke	FRESH OIL   7 a bdic eeping (Rule 114 OK. All Equip TUBING ON 8 dic tification Signs ( eping (Rule 114) OK. All Equip	Inspector Tony Morales pment and Location in LOCATION Inspector Tony Morales Rule 103)	OT VISIBLE. Violation? Yes Good Shape. Violation? Yes Good Shape.	O-28-18S-28E *Significant Non-Compliance? No PJ. STAINING AR I-28-18S-28E *Significant Non-Compliance? No PJO. STAINING AI	30-015-24448-00-0 Corrective Action Due By: 10/21/2016 OUND WELL HEAD 30-015-24484-00-0 Corrective Action Due By: 10/21/2016	Inspection No. iTM1620048494 OLD Inspection No. iTM1620044639
TOOMEY / Inspection Date 07/18/2016 Comments of TOOMEY / Inspection Date 07/18/2016	ALLEN No.01 Type Inspection Routine/Perio Violations General Houseke on Inspection: ALLEN No.014 Type Inspection Routine/Perio Violations Absent Well Iden General Houseke Surface Release	FRESH OIL   7 a dic eeping (Rule 114, OK. All Equip TUBING ON 8 dic tification Signs ( eping (Rule 114) OK. All Equip FRESH OIL C	Inspector Tony Morales pment and Location in LOCATION Inspector Tony Morales Rule 103)	OT VISIBLE. Violation? Yes Good Shape. Yes Good Shape. ATION SIGN	O-28-18S-28E *Significant Non-Compliance? NO PJ. STAINING AR I-28-18S-28E *Significant Non-Compliance? NO PJO. STAINING AL NOT VISIBLE.	30-015-24448-00-0 Corrective Action Due By: 10/21/2016 OUND WELL HEAD 30-015-24484-00-0 Corrective Action Due By: 10/21/2016	Inspection No. iTM1620048494 OLD 00 Inspection No. iTM1620044639 D.
TOOMEY / Inspection Date 07/18/2016 Comments of TOOMEY / Inspection Date 07/18/2016	ALLEN No.01 Type Inspection Routine/Peric Violations General Houseke on Inspection: ALLEN No.01 Type Inspection Routine/Perio Violations Absent Well Iden General Houseke Surface Release in Inspection:	FRESH OIL   7 a dic eeping (Rule 114, OK. All Equip TUBING ON 8 dic tification Signs ( eping (Rule 114) OK. All Equip FRESH OIL C	Inspector Tony Morales pment and Location in LOCATION Inspector Tony Morales Rule 103)	OT VISIBLE. Violation? Yes Good Shape. Violation? Yes Good Shape. ATION SIGN	O-28-18S-28E *Significant Non-Compliance? No PJ. STAINING AR I-28-18S-28E *Significant Non-Compliance? No PJO. STAINING AI NOT VISIBLE. O-28-18S-28E	30-015-24448-00-0 Corrective Action Due By: 10/21/2016 OUND WELL HEAD 30-015-24484-00-0 Corrective Action Due By: 10/21/2016 ROUND WELL HEAD	Inspection No. iTM162004849 OLD Inspection No. iTM1620044639
TOOMEY / Inspection Date 07/18/2016 Comments of TOOMEY / Inspection Date 07/18/2016	ALLEN No.01 Type Inspection Routine/Peric Violations General Houseke on Inspection: ALLEN No.014 Type Inspection Routine/Perio Violations Absent Well Idem General Houseke Surface Release in Inspection:	FRESH OIL   7 a bdic eeping (Rule 114 OK. All Equip TUBING ON 8 dic tification Signs ( eping (Rule 114) OK. All Equip FRESH OIL C dic	Inspector Tony Morales pment and Location in LOCATION Inspector Tony Morales Rule 103) Diment and Location in DN FLOWLINE LOC Inspector Tony Morales Rule 103)	OT VISIBLE. Violation? Yes Good Shape. Yes Good Shape. ATION SIGN	O-28-18S-28E *Significant Non-Compliance? NO PJ. STAINING AR I-28-18S-28E *Significant Non-Compliance? NO PJO. STAINING AI NOT VISIBLE. O-28-18S-28E *Significant	30-015-24448-00-0 Corrective Action Due By: 10/21/2016 OUND WELL HEAD 30-015-24484-00-0 Corrective Action Due By: 10/21/2016 ROUND WELL HEAD 30-015-24771-00-0 Corrective	Inspection No. iTM1620048494 OLD 00 Inspection No. iTM1620044639 D.

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TOOMEY ALLEN No.020		• •			30-015-24967-00-00				
Inspection Date	Type Inspectio	n	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.		
07/18/2016	Routine/Periodic Violations		Tony Morales	Yes	No	10/21/2016	iTM1620046847		
	Absent Well Identification Signs (Rule 103)								
	General Housekeeping (Rule 114)								
			ment and Location in Good Shape. PJ STAINING AROUND WELL HEAD. IGN NOT VISIBLE.						

In the event that a satisfactory response is not received to this letter of direction by the "Corrective Action Due By:" date shown above, further enforcement will occur. Such enforcement may include this office applying to the Division for an order summoning you to a hearing before a Divison Examiner in Santa Fe to show cause why you should not be ordered to permanently plug and abandon this well.

Sincerely,

Artesia OCD District Office

Note: Information in Detail Section comes directly from field inspector data entries - not all blanks will contain data. \*Significant Non-Compliance events are reported directly to the EPA, Region VI, Dallas, Texas.