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

20-Oct-16

VANGUARD OPERATING, LLC 5847 SAN FELIPE, SUITE 3000

HOUSTON TX 77057-

LETTER OF VIOLATION - Inactive Well(s)

Dear Operator:

A review of our records and recent inspection(s) indicate that the subject well(s) has been shut-in for an extended period of time. Rule 19.15.25.8 of the Rules and Regulation of the Oil Conservation Division provides that a well may be shut-in no longer than sixty days after suspension of drilling operations, upon determining that ther well is no longer usable (e.g., a dry hole), or one year after last production. To comply with guidelines as established in the Rules and Regulations, corrective actions must be taken immediately and the well(s) brought into compliance.

The detail section below indicates preliminary findings and/or probable nature of the violation.

The following options are available:

1. Immediately restore the well(s) to production, injection or disposal as applicable.

2. Request 'Temporary Abandoned' status pursuant to Rule 19.15.25.13, which requires that you set a plug and conduct a mechanical integrity test.

3. Submit a proposal to 'Plug and Abandon' the well(s) pursuant to Rule 19.15.25.9, proceed with plugging procedures on a timely basis after the proposal has been evaluated, amended and/or approved.

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 Division Examiner in Santa Fe to show cause why you should not be ordered to permanently plug and abandon this well. Such a hearing may result in imposition of CIVIL PENALTIES for your violation of OCD rules.

IDLE WELL INSPECTION DETAIL SECTION CHINA FEDERAL 001 B-18-7S-23E 30-005-60863-00-00 Inspection No. iUNK1629443352 **Inspection Date:** 10/20/2016 12:02:31 PM Corrective Action Due by: 1/23/2017 **Type Inspection** Inspector Violation? *Significant Non-Compliance? Routine/Periodic Ves No Violation of rule 19.15.25.8. MUST BE PROPERLY PLUGGED AND ABANDONED. LAST **Comments on Inspection:** REPORTED PRODUCTION 4-1-12. Well Sign (Rule 19.15.16.8), OPERATOR NAME NOT ON SIGN. FIRE HAZARD MUST BE CLEARED AT LEAST 150' FROM WELL RULE 19.15.10.8 30-005-60998-00-00 Inspection No. jUNK1629445482 **ROUND TOP STATE 004** F-9-7S-23E

Inspection Date: 10/20/2	2016 12:38:01 PM	Correc	Corrective Action Due by: 1/23/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic		Yes	No	
Comments on Inspection:	FIRE HAZARD- MUST BI	E CLEARED AT LEAST 150'	FROM WELL RULE 19.15.10.8	
CAROL FEDERAL 001	A-13-7S-22E	30-005-61080-00-00	Inspection No. iUNK1629442844	
Inspection Date: 10/20/2	2016 11:54:02 AM	Correc	Corrective Action Due by: 1/23/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic		Yes	No	
Comments on Inspection:	Violation of rule 19.15.25.8 REPORTED PRODUCTIO SIGN		JGGED AND ABANDONED. LAST 19.15.16.8). OPERATOR NAME NOT C	
CHINA FEDERAL 002	E-18-7S-23E	30-005-61085-00-00	Inspection No. iUNK1629442599	
Inspection Date: 10/20/2	2016 11:49:57 AM	Correc	tive Action Due by: 1/23/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic		Yes	No	
Comments on Inspection:	Violation of rule 19.15.25.8 REPORTED PRODUCTIO SIGN		IGGED AND ABANDONED. LAST 19.15.16.8). OPERATOR NAME NOT (
CHINA FEDERAL 004	K-17-7S-23E	30-005-61117-00-00	Inspection No. iUNK1629441560	
Inspection Date: 10/20/2	2016 11:32:38 AM	Correc	tive Action Due by: 1/23/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic		Yes	No	
Comments on Inspection:	Violation of rule 19.15.25.8 REPORTED PRODUCTIO SIGN		JGGED AND ABANDONED. LAST 19.15.16.8). OPERATOR NAME NOT C	
CHINA FEDERAL 005	J-18-7S-23E	30-005-61605-00-00	Inspection No. iUNK1629432117	
Inspection Date: 10/20/2	2016 8:55:12 AM	Correc	Corrective Action Due by: 1/23/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic		Yes	No	
Comments on Inspection:	Violation of rule 19.15.25.8 REPORTED PRODUCTIO SIGN		JGGED AND ABANDONED. LAST 19.15.16.8). OPERATOR NAME NOT C	
CHINA FEDERAL 007	K-18-7S-23E	30-005-61628-00-00	Inspection No. iUNK1629432541	
Inspection Date: 10/20/2	2016 9:02:20 AM	Correc	tive Action Due by: 1/23/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic		Yes	No	
Comments on Inspection:	Violation of rule 19.15.25.8 REPORTED PRODUCTIC SIGN		JGGED AND ABANDONED. LAST 19.15.16.8). OPERATOR NAME NOT (
CHINA FEDERAL 008	A-19-7S-23E	30-005-61638-00-00	Inspection No. iUNK1629433029	
Inspection Date: 10/20/	2016 9:10:28 AM	Correc	tive Action Due by: 1/23/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic		Yes	No	
Comments on Inspection:	Violation of rule 19.15.25.8 REPORTED PRODUCTIO		JGGED AND ABANDONED. LAST 19.15.16.8). SIGN IS NOT LEGIBLE	

Inspection Date: 10/20	nșpection Date: 10/20/2016 9:41:19 AM		Corrective Action Due by: 1/23/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic		Yes	No	
Comments on Inspection:	Violation of rule 19.15.25. REPORTED PRODUCTION SIGN		JGGED AND ABANDONED. LAST 19.15.16.8). OPERATOR NAME NOT OI	
CHINA FEDERAL 009	E-20-7S-23E	30-005-61657-00-00	Inspection No. iUNK1629437958	
Inspection Date: 10/20	/2016 10:32:36 AM	Correc	ctive Action Due by: 1/23/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic		Yes	No	
Comments on Inspection:	REPORTED PRODUCTION	ON 4-1-15. Well Sign (Rule	JGGED AND ABANDONED. LAST 19.15.16.8). OPERATOR NAME NOT O AST 150' FROM VICINITY OF WELL,	
CHINA FEDERAL 011	B-20-7S-23E	30-005-61658-00-00	Inspection No. iUNK1629440660	
Inspection Date: 10/20	/2016 11:17:38 AM	Correc	ctive Action Due by: 1/23/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic		Yes	No	
Comments on Inspection:			JGGED AND ABANDONED. LAST 19.15.16.8). OPERATOR NAME NOT O	
CHINA FEDERAL 012	E-19-7S-23E	30-005-61659-00-00	Inspection No. iUNK1629434220	
Inspection Date: 10/20	/2016 9:30:19 AM	Correc	Corrective Action Due by: 1/23/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic		Yes	No	
Comments on Inspection:		.8. MUST BE PROPERLY PLU ON 3-1-15. No Well Sign (Ru	JGGED AND ABANDONED. LAST ule 19.15.16.8).	
CHINA FEDERAL 014	I-19-7S-23E	30-005-61669-00-00	Inspection No. iUNK1629433567	
Inspection Date: 10/20	/2016 9:19:26 AM	6 9:19:26 AM Corrective Action Due by: 1/23/2017		
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic		Yes	No	
Comments on Inspection:	Violation of rule 19.15.25 REPORTED PRODUCTION		JGGED AND ABANDONED. LAST 19.15.16.8). OPERATOR NAME NOT O	
CHINA FEDERAL 015	K-19-7S-23E	30-005-61670-00-00	Inspection No. iUNK1629435941	
Inspection Date: 10/20	Corrective Action Due by: 1/23/201		ctive Action Due by: 1/23/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic		Yes	No	
Comments on Inspection:			UGGED AND ABANDONED. LAST 19.15.16.8). OPERATOR NAME NOT O	
CHINA FEDERAL 013	L-20-7S-23E	30-005-61688-00-00	Inspection No. iUNK1629437623	
Inspection Date: 10/20	/2016 10:27:01 AM	Corre	ctive Action Due by: 1/23/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic		Yes	No	
Comments on Inspection:	Violation of rule 19.15.25 REPORTED PRODUCTI SIGN. ROAD WASHED	ON 4-1-15. Well Sign (Rule	UGGED AND ABANDONED. LAST 19.15.16.8). OPERATOR NAME NOT C	

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Sincerely Gilbert Cordero Compliance Officer

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.