

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\***

01-Dec-16

**SCYTHIAN LTD**  
300 N. MARIENFELD SUITE 950  
MIDLAND TX 79701-

**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 the 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***

<b>MILLER FEDERAL 001</b>		<b>H-7-6S-23E</b>	<b>30-005-61850-00-00</b>	<b>Inspection No. iGC1633634569</b>
<b>Inspection Date:</b>	12/1/2016 9:36:07 AM		<b>Corrective Action Due by: 3/6/2017</b>	
<b>Type Inspection</b>	<b>Inspector</b>		<b>Violation?</b>	<b>*Significant Non-Compliance?</b>
Routine/Periodic	Gilbert Cordero		Yes	No
<b>Comments on Inspection:</b>	Violation of rule 19.15.25.8. LAST REPORTED PRODUCTION 2-1-1. OPEN TOP TANK HAS NO NETTING			
<b>CHINA DRAW FEDERAL 001</b>		<b>M-31-6S-23E</b>	<b>30-005-62233-00-00</b>	<b>Inspection No. iGC1633646621</b>
<b>Inspection Date:</b>	12/1/2016 12:56:59 PM		<b>Corrective Action Due by: 3/6/2017</b>	
<b>Type Inspection</b>	<b>Inspector</b>		<b>Violation?</b>	<b>*Significant Non-Compliance?</b>
Routine/Periodic	Gilbert Cordero		Yes	No
<b>Comments on Inspection:</b>	Violation of rule 19.15.25.8. LAST REPORTED PRODUCTION 11-1-12.			

**CHINA DRAW FEDERAL 002**      E-31-6S-23E      **30-005-62234-00-00**      Inspection No. iGC1633645050

Inspection Date: 12/1/2016 12:30:48 PM

Corrective Action Due by: 3/6/2017

Type Inspection

Inspector

Violation?

\*Significant Non-Compliance?

Routine/Periodic

Gilbert Cordero

Yes

No

Comments on Inspection: Violation of rule 19.15.25.8. LAST REPORTED PRODUCTION 5-1-12.

**CHINA DRAW FEDERAL 004**      M-30-6S-23E      **30-005-62319-00-00**      Inspection No. iGC1633644295

Inspection Date: 12/1/2016 12:18:13 PM

Corrective Action Due by: 3/6/2017

Type Inspection

Inspector

Violation?

\*Significant Non-Compliance?

Routine/Periodic

Gilbert Cordero

Yes

No

Comments on Inspection: Violation of rule 19.15.25.8. LAST REPORTED PRODUCTION 5-1-12.

**ROYALE FEE 001**      E-19-6S-23E      **30-005-62334-00-00**      Inspection No. iGC1633641894

Inspection Date: 12/1/2016 11:38:13 AM

Corrective Action Due by: 3/6/2017

Type Inspection

Inspector

Violation?

\*Significant Non-Compliance?

Routine/Periodic

Gilbert Cordero

Yes

No

Comments on Inspection: Violation of rule 19.15.25.8. LAST REPORTED PRODUCTION 5-1-12.

**ROYALE FED 001**      L-19-6S-23E      **30-005-62335-00-00**      Inspection No. iGC1633642293

Inspection Date: 12/1/2016 11:44:52 AM

Corrective Action Due by: 3/6/2017

Type Inspection

Inspector

Violation?

\*Significant Non-Compliance?

Routine/Periodic

Gilbert Cordero

Yes

No

Comments on Inspection: Violation of rule 19.15.25.8. LAST REPORTED PRODUCTION 5-1-12.

**MIDDLE FORK FEDERAL 003**      F-8-6S-23E      **30-005-62398-00-00**      Inspection No. iGC1633637659

Inspection Date: 12/1/2016 10:27:37 AM

Corrective Action Due by: 3/6/2017

Type Inspection

Inspector

Violation?

\*Significant Non-Compliance?

Routine/Periodic

Gilbert Cordero

Yes

No

Comments on Inspection: Violation of rule 19.15.25.8. LAST REPORTED PRODUCTION 5-1-12. NO WELL SIGN RULE 19.15.16.8

**MILLER FEDERAL 002**      F-7-6S-23E      **30-005-62400-00-00**      Inspection No. iGC1633636232

Inspection Date: 12/1/2016 10:03:51 AM

Corrective Action Due by: 3/6/2017

Type Inspection

Inspector

Violation?

\*Significant Non-Compliance?

Routine/Periodic

Gilbert Cordero

Yes

No

Comments on Inspection: Violation of rule 19.15.25.8. LAST REPORTED PRODUCTION 5-1-12.

**MIDDLE FORK FEDERAL 005**      M-5-6S-23E      **30-005-62416-00-00**      Inspection No. iGC1633638111

Inspection Date: 12/1/2016 10:35:09 AM

Corrective Action Due by: 3/6/2017

Type Inspection

Inspector

Violation?

\*Significant Non-Compliance?

Routine/Periodic

Gilbert Cordero

Yes

No

Comments on Inspection: Violation of rule 19.15.25.8. LAST REPORTED PRODUCTION 5-1-12.

**MILLER FEDERAL 005**      M-6-6S-23E      **30-005-62417-00-00**      Inspection No. iGC1633636442

Inspection Date: 12/1/2016 10:07:21 AM

Corrective Action Due by: 3/6/2017

Type Inspection

Inspector

Violation?

\*Significant Non-Compliance?

Routine/Periodic

Gilbert Cordero

Yes

No

Comments on Inspection: Violation of rule 19.15.25.8. LAST REPORTED PRODUCTION 4-1-12. OPEN TOP TANK HAS NO NETTING

**SNAKEWEED FEDERAL 001**      M-18-6S-23E      **30-005-62426-00-00**      Inspection No. iGC1633639779

Inspection Date: 12/1/2016 11:02:57 AM

Corrective Action Due by: 3/6/2017

Type Inspection

Inspector

Violation?

\*Significant Non-Compliance?

Routine/Periodic

Gilbert Cordero

Yes

No

Comments on Inspection: Violation of rule 19.15.25.8. LAST REPORTED PRODUCTION 5-1-12.

**M & M FEDERAL 005**

**A-19-6S-23E**

**30-005-62606-00-00**

**Inspection No. iGC1633639219**

**Inspection Date:** 12/1/2016 10:53:37 AM

**Corrective Action Due by:** 3/6/2017

**Type Inspection**

**Inspector**

**Violation?**

**\*Significant Non-Compliance?**

Routine/Periodic

Gilbert Cordero

Yes

No

**Comments on Inspection:** Violation of rule 19.15.25.8. LAST REPORTED PRODUCTION 5-1-12.

Thank you for your prompt attention to this matter and your efforts in helping to protect our environment and the infrastructure of the oil and gas industry.

Sincerely,

*Gilbert Cordero*  
Compliance Officer

Artesia OCD District Office

\* Significant Non-Compliance events are reported directly to the U.S. Environmental Protection Agency, Region VI, Dallas, Texas.