State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

David Martin

Cabinet Secretary

David Catanach, Director

Tony Delfin

Deputy Cabinet Secretary

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 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 INSF	PECTION DETAIL SECT	ION
MILLER FEDERAL 001	H-7-6S-23E	30-005-61850-00-00	Inspection No. iGC1633634569
Inspection Date: 12/1/20	16 9:36:07 AM	Correct	tive Action Due by: 3/6/2017
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?
Routine/Periodic	Gilbert Cord	lero Yes	No
Comments on Inspection:	Violation of rule 19.15.25 NETTING	.8. LAST REPORTED PRODU	CTION 2-1-1. OPEN TOP TANK HAS
CHINA DRAW FEDERAL	001 M-31-6S-23E	30-005-62233-00-00	Inspection No. iGC1633646621
Inspection Date: 12/1/20	16 12:56:59 PM	Correct	tive Action Due by: 3/6/2017
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?
Routine/Periodic	Gilbert Cord	ero Yes	No
Comments on Inspection:	Violation of rule 19.15.25	.8. LAST REPORTED PRODU	ICTION 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 Violation? *Significant Non-Compliance? Inspector Routine/Periodic Yes Gilbert Cordero Comments on Inspection: Violation of rule 19.15.25.8. LAST REPORTED PRODUCTION 5-1-12. E-19-6S-23E **ROYALE FEE 001** 30-005-62334-00-00 Inspection No. iGC1633641894 **Inspection Date:** Corrective Action Due by: 3/6/2017 12/1/2016 11:38:13 AM *Significant Non-Compliance? Type Inspection Inspector Violation? Gilbert Cordero Routine/Periodic 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 Corrective Action Due by: 3/6/2017 **Inspection Date:** 12/1/2016 11:44:52 AM *Significant Non-Compliance? Violation? Type Inspection Inspector Routine/Periodic Gilbert Cordero Yes No Comments on Inspection: Violation of rule 19.15,25.8. LAST REPORTED PRODUCTION 5-1-12. Inspection No. iGC1633637659 MIDDLE FORK FEDERAL 003 F-8-6S-23E 30-005-62398-00-00 Corrective Action Due by: 3/6/2017 **Inspection Date:** 12/1/2016 10:27:37 AM Type Inspection Inspector Violation? *Significant Non-Compliance? Gilbert Cordero Routine/Periodic 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 F-7-6S-23E 30-005-62400-00-00 Inspection No. iGC1633636232 MILLER FEDERAL 002 Corrective Action Due by: 3/6/2017 **Inspection Date:** 12/1/2016 10:03:51 AM *Significant Non-Compliance? Type Inspection Violation? Routine/Periodic Gilbert Cordero Yes No Violation of rule 19.15.25.8. LAST REPORTED PRODUCTION 5-1-12. Comments on Inspection: MIDDLE FORK FEDERAL 005 M-5-6S-23E 30-005-62416-00-00 Inspection No. iGC1633638111 Corrective Action Due by: 3/6/2017 **Inspection Date:** 12/1/2016 10:35:09 AM Type Inspection Violation? *Significant Non-Compliance? Inspector Yes Routine/Periodic Gilbert Cordero No Violation of rule 19.15.25.8. LAST REPORTED PRODUCTION 5-1-12. Comments on Inspection: **MILLER FEDERAL 005** M-6-6S-23E 30-005-62417-00-00 Inspection No. iGC1633636442 Corrective Action Due by: 3/6/2017 **Inspection Date:** 12/1/2016 10:07:21 AM Violation? *Significant Non-Compliance? Type Inspection Inspector Routine/Periodic Gilbert Cordero Yes No Violation of rule 19.15,25.8. LAST REPORTED PRODUCTION 4-1-12. OPEN TOP TANK HAS Comments on Inspection: NO NETTING Inspection No. iGC1633639779 M-18-6S-23E 30-005-62426-00-00 **SNAKEWEED FEDERAL 001** Corrective Action Due by: 3/6/2017 Inspection Date: 12/1/2016 11:02:57 AM Violation? *Significant Non-Compliance? Type Inspection Inspector No Yes Gilbert Cordero Routine/Periodic **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

Comments on Inspection:

Yes

No

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.