State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez Governor

Tony Delfin Acting Cabinet Secretary

David R. Catanach, Division Director Oil Conservation Division



Response Required - Deadline Enclosed

16-Dec-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				
ROSE FEDERAL 003	A-19-5S-25E	30-005-61758-00-00	Inspection No. iGC1635144179	
Inspection Date: 12/16/2016 12:16:17 PM		Corrective Action Due by: 3/21/2017		
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic	Gilbert Corder	o Yes LAST REPORTED PRODU	No	
Comments on Inspection: ROSE FEDERAL 004	C-19-5S-25E	30-005-61759-00-00	Inspection No. jGC1635144593	
	016 12:23:12 PM	Corrective Action Due by: 3/21/2017		
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic Comments on Inspection:	Gilbert Corder Violation of rule 19.15.25.8.	o Yes LAST REPORTED PRODU	No CTION 4-1-15	
ROSE FEDERAL COM 011	A-21-58-25E	30-005-61760-00-00	Inspection No. iGC1635137135	

Oil Conservation Division * 811 S. First St. * Artesia, New Mexico 88210 Phone: 575-748-1283 * Fax: 575-748-9720 * http://www.emnrd.state.nm.us

Inspection Date: 12/16/2	2016 10:18:54 AM	Correc	Corrective Action Due by: 3/21/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic	Gilbert Corde	ro Yes	No	
Comments on Inspection:	Violation of rule 19.15.25.8	B. LAST REPORTED PRODU	CTION 12-1-15	
CROWLEY FEDERAL CO	DM 001 E-8-5S-25E	30-005-61805-00-00	Inspection No. iGC1635132475	
Inspection Date: 12/16/2	2016 9:01:13 AM	Correc	tive Action Due by: 3/21/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic	Gilbert Corde	ro Yes	No	
Comments on Inspection:	Violation of rule 19.15.25.8	3. LAST REPORTED PRODU	CTION 12-1-15	
ROSE FEDERAL 006	K-19-5S-25E	30-005-61927-00-00	Inspection No. iGC1635144958	
Inspection Date: 12/16/2	2016 12:29:17 PM	Correc	tive Action Due by: 3/21/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic	Gilbert Corde	ro Yes	No	
Comments on Inspection:	Violation of rule 19.15.25.8	B. LAST REPORTED PRODU	CTION 5-1-15	
ROSE FEDERAL 015	E-20-5S-25E	30-005-63404-00-00	Inspection No. iGC1635143975	
Inspection Date: 12/16/2	2016 12:12:54 PM	Correc	Corrective Action Due by: 3/21/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic	Gilbert Corde	ro Yes	No	
Comments on Inspection:	Violation of rule 19.15.25.8	8. LAST REPORTED PRODU	CTION 5-1-14	
ROSE FEDERAL 014	M-19-5S-25E	30-005-63413-00-00	Inspection No. iGC1635145077	
Inspection Date: 12/16/2	2016 12:31:15 PM	Correc	tive Action Due by: 3/21/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic	Gilbert Corde	ero Yes	No	
Comments on Inspection:	Violation of rule 19.15.25.8	B. LAST REPORTED PRODU	CTION 12-1-14	

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.