

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

Ken McQueen
Cabinet Secretary

Matthias Sayer
Deputy Cabinet Secretary

Heather Riley
Division Director



Response Required - Deadline Enclosed

21-Sep-18

VANGUARD OPERATING, LLC

5847 San Felipe, Suite 3000
Houston TX 77057-7057

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 19.15.25.8, 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

MILLMAN H. D. STATE COM. O-17-19S-28E 30-015-22023-00-00 Inspection No. iGC1826447812
001

Inspection Date: 9/21/2018 1:16:49 PM

Corrective Action Due by: 12/25/2018

Type Inspection

Inspector

Violation?

*Significant Non-Compliance?

Routine/Periodic

Gilbert Cordero

Yes

No

Comments on Inspection: 2nd NOTICE - Violation of rule 19.15.25.8. LAST REPORTED PRODUCTION 10-1-15

MILLMAN H. D. STATE COM. B-17-19S-28E 30-015-22249-00-00 Inspection No. iGC1826447480
002

Inspection Date: 9/21/2018 1:11:18 PM

Corrective Action Due by: 12/25/2018

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 5-1-17

NORTH MILLMAN UNIT 003

K-8-19S-28E

30-015-23838-00-00

Inspection No. iGC1826447043

Inspection Date: 9/21/2018 1:04:01 PM

Corrective Action Due by: 12/25/2018

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 3-1-17.

MILLMAN SB STATE COM 001

G-16-19S-28E

30-015-23998-00-00

Inspection No. iGC1826437846

Inspection Date: 9/21/2018 10:30:44 AM

Corrective Action Due by: 12/25/2018

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 3-1-17. LOCATION NEEDS MAJOR ATTENTION - TRASH, TUBING, RODS AND WEEDS NEED TO BE REMOVED

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
Staff Mgr

Artesia OCD District Office

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