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

27-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.

	DLE WELL INSPE	CTION DETAIL SECT	ION
EVERETTE OO FEDERAL 004	K-25-5S-24E	30-005-60889-00-00	Inspection No. iGC1636234206
Inspection Date: 12/27/2016 9::	30:04 AM	Correc	tive Action Due by: 4/1/2017
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?
Routine/Periodic	Gilbert Cordere	Yes	No
Comments on Inspection: Viol	ation of rule 19.15.25.8.	LAST REPORTED PRODU	JCTION 11-1-15
GRYNBERG LZ STATE 004	E-36-5S-24E	30-005-61535-00-00	Inspection No. iGC1636236330
Inspection Date: 12/27/2016 10:05:29 AM		Corrective Action Due by: 4/1/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?
Routine/Periodic	Gilbert Corder	Yes	No
Comments on Inspection: Viol	ation of rule 19.15.25.8.	LAST REPORTED PRODU	JCTION 11-1-15
MONAGHAN QY FEDERAL 011	C-34-5S-24E	30-005-62121-00-00	Inspection No. iGC1636243070

Inspection Date: 12/27/2016 11:57:49 AM Corrective Action Due by: 4/1/2017

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 1-1-15

GRYNBERG LZ STATE 006 K-36-5S-24E 30-005-63334-00-00 Inspection No. iGC1636236910

Inspection Date: 12/27/2016 10:15:09 AM Corrective Action Due by: 4/1/2017

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 6-1-15

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.