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1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy, Minerals and Natural Resources

Form C-103
Revised July 18, 2013

OIL CONSERVATION DIVISION
1220 South St. Francis Dr.
Santa Fe, NM 87505

WELL API NO. 30-015-23358
5. Indicate Type of Lease STATE [X] FEE [ ]
6. State Oil & Gas Lease No.
7. Lease Name or Unit Agreement Name Delhi State
8. Well Number #8
9. OGRID Number 372279
10. Pool name or Wildcat Empire; Yates-7 Rivers
11. Elevation (Show whether DR, RKB, RT, GR, etc.) 3,617' GR

SUNDRY NOTICES AND REPORTS ON WELLS
(DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH PROPOSALS.)
1. Type of Well: Oil Well [X] Gas Well [ ] Other [ ]
2. Name of Operator LLJ Ventures, LLC DBA Marker Oil & Gas, ("LLJ")
3. Address of Operator PO Box 3188 Roswell, NM 88202
4. Well Location
Unit Letter C : 369 feet from the N line and 2293 feet from the W line
Section 36 Township 17S Range 27E NMPM County Eddy
11. Elevation (Show whether DR, RKB, RT, GR, etc.) 3,617' GR

12. Check Appropriate Box to Indicate Nature of Notice, Report or Other Data

NOTICE OF INTENTION TO:
PERFORM REMEDIAL WORK [ ] PLUG AND ABANDON [X]
TEMPORARILY ABANDON [ ] CHANGE PLANS [ ]
PULL OR ALTER CASING [ ] MULTIPLE COMPL [ ]
DOWNHOLE COMMINGLE [ ]
CLOSED-LOOP SYSTEM [ ]
OTHER: [ ]
SUBSEQUENT REPORT OF:
REMEDIAL WORK [ ] ALTERING CASING [ ]
COMMENCE DRILLING OPNS. [ ] P AND A [ ]
CASING/CEMENT JOB [ ]
OTHER: [ ]

13. Describe proposed or completed operations. (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work). SEE RULE 19.15.7.14 NMAC. For Multiple Completions: Attach wellbore diagram of proposed completion or recompletion.

OCD hereby authorizes COP, to plug and abandon the above-identified well on OCD's behalf pursuant to its authority under R-23494

- 1. RIH & tag TD @ 530'. Spot 140 sxs class C cmt @ 530' & circulate to surface.
2. Cut off wellhead, verify/top off cmt at surface, & install DHM. Dig up anchors, backfill cellar, clean location, & move off.

Spud Date: [ ]

Rig Release Date: [ ]

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE Jeanette Barron TITLE Regulatory Coordinator DATE 04.28.25

Type or print name Jeanette Barron E-mail address: jeanette.barron@conocophillips.com PHONE: 575-748-6974

For State Use Only

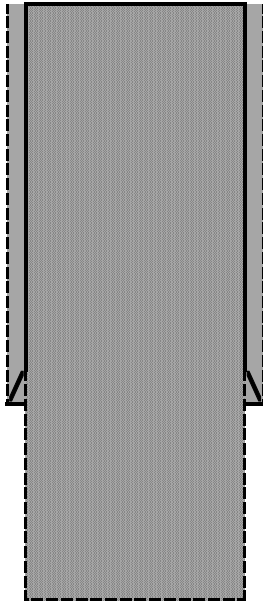
APPROVED BY: TITLE DATE

Conditions of Approval (if any):

COP on behalf of LLJ Bentures, LLC DBA Marker Oil & Gas		Proposed	
Author:	<b>Abby @ JMR</b>	Well No.	<b>#8</b>
Well Name	<b>Delhi</b>	API #:	<b>30-015-23358</b>
Field/Pool	<b>Empire; Yates-7Rvs</b>	Location:	<b>Sec 36, T17S, R27E</b>
County	<b>Eddy</b>		<b>369 FNL &amp; 2293 FWL</b>
State	<b>NM</b>	GL:	<b>3617</b>
Spud Date	<b>3/1/2012</b>		

Description	O.D.	Grade	Weight	Depth	Hole	Cmt Sx	TOC
Prod Csg	<b>7</b>		<b>32#</b>	<b>474</b>	<b>8</b>	<b>140</b>	<b>0</b>

Formation	Top



1. RIH & tag TD @ 530'. Spot 140 sxs class C cmt @ 530' & circulate to surface.

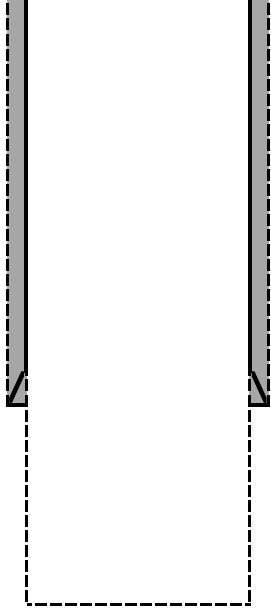
7 32# CSG @ 474  
Hole Size: 8

TD @ 530'

<b>COP on behalf of LLJ Bentures, LLC DBA Marker Oil &amp; Gas</b>		<b>CURRENT</b>	
Author:	<b>Abby @ JMR</b>	Well No.:	<b>#8</b>
Well Name	<b>Delhi</b>	API #:	<b>30-015-23358</b>
Field/Pool	<b>Empire; Yates-7Rvs</b>	Location:	<b>Sec 36, T17S, R27E</b>
County	<b>Eddy</b>		<b>369 FNL &amp; 2293 FWL</b>
State	<b>NM</b>	GL:	<b>3617</b>
Spud Date	<b>3/1/2012</b>		

Description	O.D.	Grade	Weight	Depth	Hole	Cmt Sx	TOC
Prod Csg	<b>7</b>		<b>32#</b>	<b>474</b>	<b>8</b>	<b>140</b>	<b>0</b>

Formation	Top



**7 32# CSG @ 474**  
**Hole Size: 8**

**TD @ 530'**

State of New Mexico  
Energy, Minerals and Natural Resources Department

**Michelle Lujan-Grisham**  
Governor

**Melanie A. Kenderdine**  
Cabinet Secretary-Designate

**Benjamin Shelton**  
Deputy Secretary (Acting)

**Gerasimos Razatos**, Division Director (Acting)  
Oil Conservation Division



**BY ELECTRONIC MAIL**

Beth Ryan  
Lead Counsel, New Mexico  
COG Operating LLC  
600 W. Illinois Ave  
Midland, Texas 79701  
[Beth.Ryan@conocophillips.com](mailto:Beth.Ryan@conocophillips.com)

**Re: Oil Conservation Division Authorization for ConocoPhillips to Plug and Abandon Well(s)**

Ms. Ryan:

The Oil Conservation Division (“OCD”) received your request of November 11, 2024, requesting authorization for ConocoPhillips (“COP”), to plug and abandon the following wells: Delhi No. 8, API No. 30-015-23358. LLJ Ventures, LLC DBA Marker Oil & Gas, (“LLJ”) is the registered operator of this well and COP is the leaseholder where the well is located. As the leaseholder, COP may be deemed a responsible operator for purposes of plugging and remediation activities or for indemnification of costs incurred by OCD for such activities.

On October 11, 2024, OCD issued Final Order No. R-23494 (“R-23494”). R-23494 setting forth plugging compliance deadlines to be met by LLJ. That R-23494 and R-23494-A is incorporated herein as though set forth in full.

OCD hereby authorizes COP, to plug and abandon the above-identified well on OCD’s behalf pursuant to its authority under R-23494.

Please contact Assistant General Counsel, Christy Treviño at (505)-607-4524 or [Christy.Trevino@emnrd.nm.gov](mailto:Christy.Trevino@emnrd.nm.gov), with questions, including the submission of plugging sundries as OCD will not be transferring operatorship to you and will need to place the plugging sundries into the well files.

Regards,

Gerasimos Razatos  
Director (Acting)

4/15/2025

Date

cc: EMNRD-OGC

**STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION**

OIL CONSERVATION DIVISION  
PETITIONER

v.

LLJ VENTURES, LLC  
DBA MARKER OIL & GAS  
RESPONDENT

CASE NO. 24801  
ORDER NO. R-23484-A

**NUNC PRO TUNC ORDER**

The Director of the New Mexico Oil Conservation Division (“OCD”), having determined that an error occurred in Order R-23484 in this matter, which requires correction, issues the following *Nunc Pro Tunc* Order.

**FINDINGS OF FACT**

1. Order R-23484, issued October 11, 2024, (“Order”) contains an error the number of wells in paragraph 21 of the Order.
2. Exhibit 8-A is not reflective of the total number of wells OCD requested authorization over.
3. An administrative error was discovered in that Exhibit 8-A was missing a well that was included in the original filings, Exhibit 2-A of the Notice of Violation. API # 30-015-00689 GATES STATE #001 was to be included in the supplemental Exhibit 8-A. Exhibit 2-A was generated on July 24, 2024, showing one hundred and fifty wells. API # 30-015-00689 GATES STATE #001 was plugged on August 12, 2024. Amended exhibits were filed on October 11, 2024, showing one hundred and forty-seven wells. Exhibit 8-A was a regeneration of Exhibit 2-A, which was intended to show the two wells transferred off the inactive well list. However, since API # 30-015-00689 GATES STATE #001 was plugged, not released it was inadvertently removed from the inactive well list report as well.
4. Unbeknownst to OCD API # 30-015-00689 GATES STATE #001, was plugged and certain site inspections still need to be complete to release the well.
5. The number of wells OCD was seeking authorization over was indicated as one hundred and forty-eight throughout the record for Case No. 24801 on page 28 through page 40 of the transcript.

**ORDER**

6. Paragraph 21 of the Order is corrected to read as follows:

“21. Operator shall plug and abandon all remaining non-compliant wells listed in OCD Ex. 2-A no later than 30 days after issuance of this Order.”

7. The corrections are effective *nunc pro tunc* as of the date of the Order.

8. All other provisions of the Order remain in full force and effect.

**STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION**



**Gerasimos Razatos  
ACTING DIRECTOR**

**Date:** 12/24/2024

CASE NO. 24801  
ORDER NO. R-23484-A

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**STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION**

**OIL CONSERVATION DIVISION,  
PETITIONER**

**v.**

**LLJ VENTURES, LLC  
DBA MARKER OIL & GAS,  
RESPONDENT**

**CASE NO. 24801  
ORDER NO. R-23494**

**ORDER**

This matter came before the Director of the New Mexico Oil Conservation Division (“Division” or “OCD”) on the Notice of Violation (“NOV”) dated on or about July 23, 2024, issued to LLJ Ventures, LLC DBA Marker Oil & Gas, OGRID #372279 (“Operator”). The Division’s Hearing Examiner conducted a public hearing on October 3, 2024. The Director, having considered the testimony and evidence presented, and being otherwise fully advised in the premises, finds, concludes and orders:

**FINDINGS OF FACT**

1. The Division has jurisdiction over the parties and the subject matter herein.
2. On or about July 9, 2024, the Division issued the NOV, which alleged three violations:
  - a. Operator allegedly violated 19.15.5.9(A)(4)(a) NMAC. At the time of the NOV, Operator was the registered operator of one hundred and fifty wells in New Mexico. Under 19.15.5.9(A)(4)(a) NMAC, as the operator of 100 wells or less, Operator was not permitted to have more than two inactive wells out of compliance with 19.15.25.8 NMAC, which requires inactive wells to be plugged and abandoned or placed into approved temporary abandonment status. At the time of the NOV, Operator had one hundred and fifty inactive

**FINAL ORDER  
CASE NO. 24801  
1**

wells, which were not plugged and abandoned or placed into temporary abandonment status as demonstrated by OCD Ex. 4-A.

- b. Operator allegedly violated 19.15.8.9 NMAC by lacking financial assurance for fifty wells.
- c. Operator allegedly violated 19.15.7.24 NMAC by not filing the required monthly production reports, form C-115, as demonstrated by OCD Ex 4-B. Operator had not submitted a C-115 for any well since at least June 2022.

OCD Ex.4

- 3. Operator transferred two wells, authorized by OCD to another operator. On October 2, 2024, OCD filed updated Inactive Well Report, Financial Assurance Report, and Civil Penalty Calculator to reflect the approved transfer. OCD Ex. 8A-D.
- 4. Based on the approved transfer of two wells, the correct number of inactive wells is one hundred and forty-eight (OCD Ex. 8-A), and the wells lacking sufficient financial assurance is forty-eight. OCD Ex. 8-C.
- 5. The NOV demanded the following relief:
  - a. Operator shall plug and abandon all one hundred and forty-eight wells listed in by a certain date or failing to do so, the Division would assume that duty,
  - b. Operator's financial assurance shall be forfeited,
  - c. Operator's authority to transport from the one hundred and forty-eight registered wells identified in shall be terminated,
  - d. Operator is civilly liable for violations of 19.15.5.9(A)(4)(a), 19.15.8.9 and 19.15.7.24 NMAC in the amount of \$414,000.00.

**FINAL ORDER**  
**CASE NO. 24801**  
**2**



6. The NOV informed Operator of OCD's informal resolution process, and in the event Operator did not respond to the NOV, that a formal hearing would occur on the October 3, 2024 docket.
7. Operator did not contact the Division during the informal resolution period or provide any evidence that the alleged violations had not occurred. Operator did not file a prehearing statement to enter an appearance or otherwise present evidence pursuant to 19.15.5 NMAC.
8. On August 14, 2024, OCD filed and served the Docketing Notice and formally requested a hearing. Operator did not answer the NOV as contemplated by 19.15.5.10(E)(2)(b) NMAC.
9. The Division provided Operator with notice of the October 3, 2024 hearing as required under 19.15.5.10 NMAC.
10. A hybrid hearing (in-person at Pecos Hall in Santa Fe, NM and virtually through Microsoft Teams) on the NOV was held on October 3, 2024 before a Division Hearing Examiner. Operator did not appear.
11. The Division presented the Affidavits of Nicholas Karns, Compliance Officer and Bond Administrator with the Division's Administrative and Compliance Bureau, and Sara Griego, OCD Law Clerk and corresponding exhibits.
12. The Division provided evidence of notice of the Docketing Statement. OCD Ex. 6.
13. Eight Exhibits were admitted into evidence without objection in support of the NOV.
14. Mr. Karns, who was previously qualified as an expert in administrative compliance before the Division, provided the following evidence in support of the ongoing violations:
  - a. As of October 3, 2024, Operator remained out of compliance with the inactive well requirements of 19.15.5.9(A)(4)(a) NMAC. As of October 1, 2024, Operator had one hundred and forty-eight wells, all of which were

inactive wells that had not been plugged and abandoned or placed in approved temporary abandonment status. OCD Ex. 8-A.

- b. Operator remained out of compliance with 19.15.8.9 NMAC by lacking financial assurance for forty-eight wells. OCD Ex. 8-C.
- c. Operator remained out of compliance with 19.15.7.24 NMAC, because Operator had not filed the required C-115 production reports since June 2022. OCD Ex 4-C.

15. The Oil and Gas Act provides that “[i]n assessing a penalty authorized by this section, the division shall take into account the seriousness of the violation, any good faith efforts to comply with the applicable requirements, any history of noncompliance under the Oil and Gas Act and other relevant factors.” NMSA 1978, §70-2-31(C). OCD provided evidence that the penalties were reasonable and in accordance with the law. OCD Ex. 8-D

#### **CONCLUSIONS OF LAW**

- 16. The Division has met its burden to show by a preponderance of evidence that Operator has violated 19.15.5.9(A)(4)(a) NMAC by failing to plug and abandon one hundred and forty-eight inactive wells.
- 17. Operator has violated 19.15.8.9 NMAC by lacking financial assurance for forty-eight of the subject wells.
- 18. Operator has violated 19.15.7.24 NMAC by failing to submit the required C-115 forms for all subject wells.
- 19. The civil penalties calculated by the Division are allowed by law, reasonable under 19.15.5.10(B) NMAC, and are supported by the evidence in the Administrative and Hearing Records.

**FINAL ORDER**  
**CASE NO. 24801**  
**4**

**ORDER**

20. Operator's authority to transport from subject wells is hereby suspended until such time as Operator is compliant with this Order and the NM Oil and Gas Act.
21. Operator shall plug and abandon all twelve wells listed in OCD Ex. 8-A no later than 30 days after issuance of this Order.
22. If Operator fails to plug and abandon the subject wells as directed herein, the Division shall be authorized to plug and abandon the wells and to forfeit the financial assurance for the wells. Such plugging activities may include necessary reclamation or remediation work associated with wells that have been partially plugged and abandoned, Operator shall pay the excess cost to plug and abandon the wells no later than 30 days after actual or attempted service of the Division's written demand. If the excess costs to the Division are not received, the Division may seek indemnification.
23. The Division retains jurisdiction of this matter for the entry of such further orders as it may deem necessary.

**STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION**



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**GERASIMOS RAZATOS  
ACTING DIRECTOR**

**FINAL ORDER  
CASE NO. 24801  
5**

Sante Fe Main Office  
Phone: (505) 476-3441

General Information  
Phone: (505) 629-6116

Online Phone Directory  
<https://www.emnrd.nm.gov/ocd/contact-us>

**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

CONDITIONS

Action 456307

**CONDITIONS**

Operator: CONOCOPHILLIPS COMPANY 600 W. Illinois Avenue Midland, TX 79701	OGRID: 217817
	Action Number: 456307
	Action Type: [C-103] NOI Plug & Abandon (C-103F)

**CONDITIONS**

Created By	Condition	Condition Date
loren.diede	Notify the OCD inspection supervisor via email 24 hours prior to beginning Plug & Abandon (P&A) operations.	4/29/2025
loren.diede	A CBL will be required, submit CBL tif file to OCD for upload into Well Log File	4/29/2025
loren.diede	This well is not within LPCH restricted area. An above ground P&A marker is approved.	4/29/2025