State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

David Martin

Cabinet Secretary

Tony Delfin

Deputy Cabinet Secretary

David Catanach, Director Oil Conservation Division

Response Required - Deadline Enclosed



20-Oct-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

CHINA FEDERAL 001

B-18-7S-23E

30-005-60863-00-00

Inspection No. iUNK 1629443352

Inspection Date:

10/20/2016 12:02:31 PM

Corrective Action Due by: 1/23/2017

Type Inspection

Inspector

Violation?

*Significant Non-Compliance?

Routine/Periodic

Yes

Comments on Inspection:

Violation of rule 19.15.25.8. MUST BE PROPERLY PLUGGED AND ABANDONED. LAST REPORTED PRODUCTION 4-1-12. Well Sign (Rule 19.15.16.8). OPERATOR NAME NOT ON

SIGN. FIRE HAZARD MUST BE CLEARED AT LEAST 150' FROM WELL RULE 19.15.10.8

ROUND TOP STATE 004

F-9-7S-23E

30-005-60998-00-00

Inspection No. iUNK1629445482

Inspection Date: 10/20/2016 12:38:01 PM Corrective Action Due by: 1/23/2017 Violation? *Significant Non-Compliance? Type Inspection Inspector Routine/Periodic Yes No Comments on Inspection: FIRE HAZARD- MUST BE CLEARED AT LEAST 150' FROM WELL RULE 19.15.10.8 **CAROL FEDERAL 001** A-13-7S-22E 30-005-61080-00-00 Inspection No. iUNK 1629442844 **Inspection Date:** 10/20/2016 11:54:02 AM Corrective Action Due by: 1/23/2017 Type Inspection Violation? *Significant Non-Compliance? Inspector Routine/Periodic Yes Nο Comments on Inspection: Violation of rule 19.15.25.8. MUST BE PROPERLY PLUGGED AND ABANDONED. LAST REPORTED PRODUCTION 9-1-15. Well Sign (Rule 19.15.16.8). OPERATOR NAME NOT ON SIGN **CHINA FEDERAL 002** E-18-7S-23E 30-005-61085-00-00 Inspection No. iUNK1629442599 Inspection Date: 10/20/2016 11:49:57 AM Corrective Action Due by: 1/23/2017 **Type Inspection** Violation? *Significant Non-Compliance? Inspector Routine/Periodic Yes No Violation of rule 19.15.25.8. MUST BE PROPERLY PLUGGED AND ABANDONED. LAST Comments on Inspection: REPORTED PRODUCTION 9-1-15. Well Sign (Rule 19.15.16.8). OPERATOR NAME NOT ON SIGN **CHINA FEDERAL 004** K-17-7S-23E 30-005-61117-00-00 Inspection No. iUNK 1629441560 Corrective Action Due by: 1/23/2017 **Inspection Date:** 10/20/2016 11:32:38 AM Violation? *Significant Non-Compliance? **Type Inspection** Inspector Routine/Periodic Yes Violation of rule 19.15.25.8, MUST BE PROPERLY PLUGGED AND ABANDONED, LAST Comments on Inspection: REPORTED PRODUCTION 9-1-14. Well Sign (Rule 19.15.16.8). OPERATOR NAME NOT ON **SIGN** 30-005-61605-00-00 Inspection No. iUNK1629432117 **CHINA FEDERAL 005** J-18-7S-23E **Inspection Date:** Corrective Action Due by: 1/23/2017 10/20/2016 8:55:12 AM Type Inspection Inspector Violation? *Significant Non-Compliance? Routine/Periodic Yes No Comments on Inspection: Violation of rule 19.15.25.8. MUST BE PROPERLY PLUGGED AND ABANDONED. LAST REPORTED PRODUCTION 9-1-15. Well Sign (Rule 19.15.16.8). OPERATOR NAME NOT ON **SIGN CHINA FEDERAL 007** K-18-7S-23E 30-005-61628-00-00 Inspection No. iUNK 1629432541 **Inspection Date:** 10/20/2016 9:02:20 AM Corrective Action Due by: 1/23/2017 Type Inspection Violation? *Significant Non-Compliance? Inspector Yes Routine/Periodic No Comments on Inspection: Violation of rule 19.15.25.8, MUST BE PROPERLY PLUGGED AND ABANDONED. LAST REPORTED PRODUCTION 9-1-15. Well Sign (Rule 19.15.16.8). OPERATOR NAME NOT ON **SIGN CHINA FEDERAL 008** A-19-7S-23E 30-005-61638-00-00 Inspection No. iUNK1629433029 **Inspection Date:** 10/20/2016 9:10:28 AM Corrective Action Due by: 1/23/2017 *Significant Non-Compliance? Type Inspection Inspector Violation? Routine/Periodic Yes No Comments on Inspection: Violation of rule 19.15.25.8. MUST BE PROPERLY PLUGGED AND ABANDONED. LAST Well Sign (Rule 19.15.16.8). SIGN IS NOT LEGIBLE REPORTED PRODUCTION 9-1-15.

O-13-7S-22E

CAROL FEDERAL 003

30-005-61656-00-00

Inspection No. iUNK1629434881

Inspection Date: 10/20/2016 9:41:19 AM Corrective Action Due by: 1/23/2017 *Significant Non-Compliance? Type Inspection Inspector Violation? Routine/Periodic Yes No Comments on Inspection: Violation of rule 19.15.25.8. MUST BE PROPERLY PLUGGED AND ABANDONED. LAST REPORTED PRODUCTION 4-1-15. Well Sign (Rule 19.15.16.8). OPERATOR NAME NOT ON **SIGN CHINA FEDERAL 009** E-20-7S-23E 30-005-61657-00-00 Inspection No. iUNK1629437958 Corrective Action Due by: 1/23/2017 **Inspection Date:** 10/20/2016 10:32:36 AM Type Inspection Violation? *Significant Non-Compliance? Inspector Routine/Periodic Yes Violation of rule 19.15.25.8. MUST BE PROPERLY PLUGGED AND ABANDONED. LAST **Comments on Inspection:** REPORTED PRODUCTION 4-1-15. Well Sign (Rule 19.15.16.8). OPERATOR NAME NOT ON SIGN. FIRE HAZARD -MUST BE CLEARED AT LEAST 150' FROM VICINITY OF WELL, RULE 19.15.10.8. B-20-7S-23E 30-005-61658-00-00 Inspection No. iUNK1629440660 **CHINA FEDERAL 011 Inspection Date:** 10/20/2016 11:17:38 AM Corrective Action Due by: 1/23/2017 **Type Inspection** Violation? *Significant Non-Compliance? Inspector Yes Routine/Periodic Violation of rule 19.15.25.8. MUST BE PROPERLY PLUGGED AND ABANDONED. LAST Comments on Inspection: REPORTED PRODUCTION 9-1-15. Well Sign (Rule 19.15.16.8). OPERATOR NAME NOT ON **SIGN** E-19-7S-23E 30-005-61659-00-00 Inspection No. iUNK1629434220 **CHINA FEDERAL 012** 10/20/2016 9:30:19 AM Corrective Action Due by: 1/23/2017 **Inspection Date:** Violation? *Significant Non-Compliance? Type Inspection Inspector Routine/Periodic Yes No Comments on Inspection: Violation of rule 19.15.25.8. MUST BE PROPERLY PLUGGED AND ABANDONED. LAST REPORTED PRODUCTION 3-1-15. No Well Sign (Rule 19.15.16.8). **CHINA FEDERAL 014** I-19-7S-23E 30-005-61669-00-00 Inspection No. iUNK1629433567 Corrective Action Due by: 1/23/2017 10/20/2016 9:19:26 AM **Inspection Date:** *Significant Non-Compliance? **Type Inspection** Violation? Inspector Yes No Routine/Periodic Violation of rule 19.15.25.8. MUST BE PROPERLY PLUGGED AND ABANDONED. LAST **Comments on Inspection:** REPORTED PRODUCTION 4-1-15. Well Sign (Rule 19.15.16.8). OPERATOR NAME NOT ON SIGN **CHINA FEDERAL 015** K-19-7S-23E 30-005-61670-00-00 Inspection No. iUNK 1629435941 Corrective Action Due by: 1/23/2017 **Inspection Date:** 10/20/2016 9:58:59 AM Violation? *Significant Non-Compliance? **Type Inspection** Inspector Routine/Periodic Yes No Violation of rule 19.15.25.8, MUST BE PROPERLY PLUGGED AND ABANDONED. LAST **Comments on Inspection:** REPORTED PRODUCTION 4-1-15. Well Sign (Rule 19.15.16.8). OPERATOR NAME NOT ON **SIGN** Inspection No. iUNK1629437623 **CHINA FEDERAL 013** L-20-7S-23E 30-005-61688-00-00 Corrective Action Due by: 1/23/2017 **Inspection Date:** 10/20/2016 10:27:01 AM *Significant Non-Compliance? Violation? **Type Inspection** Inspector

SIGN. ROAD WASHED OUT

Yes

Violation of rule 19.15.25.8. MUST BE PROPERLY PLUGGED AND ABANDONED. LAST

REPORTED PRODUCTION 4-1-15. Well Sign (Rule 19.15.16.8). OPERATOR NAME NOT ON

Routine/Periodic

Comments on Inspection:

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 Divison Examiner in Santa Fe to show cause why you should not be ordered to permanently plug and abandon this well.

Sincerely,

Compliance Officer

Artesia OCD District Office

Note: Information in Detail Section comes directly from field inspector data entries - not all blanks will contain data.

*Significant Non-Compliance events are reported directly to the EPA, Region VI, Dallas, Texas.