Susana Martinez Governor

Ken McQueen Cabinet Secretary-Designate

Matthias Sayer Deputy Cabinet Secretary

15-Jun-17

SELLERS&FULTON OIL LLC 422 W MAIN SUITE 5 PO BOX 1176 Text158: ARTESIA NM 88210David R. Catanach, Division Director Oil Conservation Division



## **LETTER OF VIOLATION - Inactive Well(s)**

Dear Operator:

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 (3) WELLS TO BE PROPERLY ABANDONED 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

- 1. Immediately restore the well(s) to production, injection or disposal as applicable. Submit Form C-103 stating how and when wells became active and monthly file electronically Form C-115
- 2. Request 'Temporary Abandoned' status pursuant to Rule 19.15.25.13 on Form C-103, which requires that
- 3. Submit a proposal to 'Plug and Abandon' the well(s) pursuant to Rule 19.15.25.9 on Form C-103 and, you set a plug and conduct a mechanical integrity test proceed with
- . plugging procedures on a timely basis after the proposal has been evaluated, amended and/or approved .

In the event that a "PLAN OF ACTION "is not received within thirty days of this letter and all compliance issues completed by. the "Corrective Action Due By" date shown above, further enforcement will occur

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## RULE 19.15.16.8 SIGN ON WELLS

**A.** An operator shall identify wells and related facilities the division regulates by a sign, which shall remain in place until the operator plugs and abandons the well and closes the related facilities.

**B.** For drilling wells, the operator shall post the sign on the derrick or not more than 20 feet from the well. **C.** The sign shall be of durable construction and the lettering shall be legible and large enough to be read under normal conditions at a distance of 50 feet.

**D.** The wells on each lease or property shall be numbered in non-repetitive, logical and distinctive sequence. F. An operator shall have 90 days from the effective date of an operator name change to change the operator name on the well sign unless the division grants an extension of time, for good cause shown along with a schedule for making the changes.

Each sign shall show the:

- (1) well number;
- (2) property name;
- (3) operator's name;
- (4) location by footage, quarter-quarter section, township and range (or unit letter can be substituted for the quarter-quarter section), and
- (5) API number.

## **IDLE WELL INSPECTION DETAIL SECTION**

FARMER FEDERA iTWG1716443286	L 002	I-12-16S-29E	30-015-02687-00-	Inspection No.	
Inspection Date: Type Inspection Compliance?	6/13/2017 12	2:01:21 PM Inspector	C: Violatio	orrective Action Due by: 9 n? *Significant No	
Routine/Periodic Comments on Inspection: RUNING. OSCVS OPEN IN BTTY AREA. WIND RULE: 19.15.25.8 VIL	IE J. FLOWLINE SOCK NEEDS	LINE VALVE OPEN	Ye PORTED PRODUCTION - . WHHP. BTTY EQUIPMI	3/15. PJ.NO POWER, F	
	PIC	CTURES TAKEN.			
HIGH LONESOME iTWG1716542216	E PENROSE	UNIT	H-15-16S-29E	30-015-02722-00- Ins	spection No.
Inspection Date: Type Inspection Compliance?	6/14/2017 11	:43:33 AM Inspector	C Violatio	orrective Action Due by: 9 on? *Significant No	
Routine/Periodic Comments on Inspe	ection: ID PR RU	Tim Gum LE W NO DROP POLE ODUCTION11/15. PJ JLE: 19.15.25.8 VILC CTURES TAKEN.			No ORTED

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HIGH LONESOME PENROSE UNIT G-15-16S-29E 30-015-02728-00- Inspection No. iTWG1716539811 002 **Inspection Date:** 6/14/2017 11:03:27 AM Corrective Action Due by: 9/17/2017 **Type Inspection** Violation? \*Significant Non-Inspector **Compliance?** Routine/Periodic Tim Gum Yes No IDLE WELL, LAST REPORTED PRODUCTION --11/15, PJ.PO.NO ELECTRIC **Comments on Inspection:** SERVICE.OSCVO., BTTY EQUIPMENT- 1 TK NO WIND SOCK & I GB. OLD WTR. STATION NO PUMPS .. RULE :19.15.25.8 VIOLATION. PICTURES TAKEN **HIGH LONESOME PENROSE UNIT** J-15-16S-29E 30-015-02734-00- Inspection No. iTWG1716542806 007 6/14/2017 11:53:22 AM Corrective Action Due by: 9/17/2017 **Inspection Date: Type Inspection** \*Significant Non-Inspector Violation? Compliance? Routine/Periodic Tim Gum Yes No IDLE WELL-LAST REPORTED PRODUCTION -11/15. PJ.PO. WHS. RULE: 19.15.25.8 **Comments on Inspection:** VIOLATION. PICTURES TAKEN. 30-015-02754-00-**ILES FEDERAL 001Y** P-17-16S-29E **Inspection No.** iTWG1716536702 6/14/2017 10:11:34 AM **Inspection Date:** Corrective Action Due by: 9/17/2017 **Type Inspection** Violation? \*Significant Non-Inspector **Compliance?** Routine/Periodic Tim Gum Yes No IDLE WELL . LAST REPORTED PRODUCTION --12/15 . PJ.PO NO DROP POLE NO **Comments on Inspection:** ELECTRIC CONNECTION, OSCVO, WHHP. NO WELL SIGN. WRONG OPERATOR NAME ON BTTY SIGN . BTTY EQUIPMENT - 1 ACTIVE TK, NO WIND SOCK, & 1 TK OUT OF SERVICE. RULES: 19.15.25.8 & 19.15.16.8 VIOLATION . PICTURES TAKEN WELCH ST 001 B-21-18S-28E 30-015-24304-00-**Inspection No.** iTWG1716343720 **Inspection Date:** 6/12/2017 12:08:23 PM Corrective Action Due by: 9/15/2017 **Type Inspection** Violation? \*Significant Non-Inspector **Compliance?** Routine/Periodic Tim Gum Yes No IDLE WELL -LRP- 2/16, PJ. .PO.OSCVO. **Comments on Inspection:** TBG/FLOWLINE VALVE CLOSED, WRONG OPERATOR NAME OFN WELL. SIGN.NO API NO ON WELL SIGN. 2-TK BTTY, NET ON WTR TK NEEDS REPAIR . RULES: 19.15,25.8 & 19.15.16.8 VIOLATION PICTRES TAKEN. WELCH ST 004 30-015-24557-00-A-21-18S-28E **Inspection No.** iTWG1716339912 6/12/2017 11:05:08 AM Corrective Action Due by: 9/15/2017 **Inspection Date: Type Inspection** Inspector Violation? \*Significant Non-Compliance? Routine/Periodic Tim Gum Yes No **Comments on Inspection:** IDLE WELL -- LRP--12/14. PJ.PO.OSCVO. TBG/FLOWLINE VALVE CLOSED. WHHP. 2-TK BTTY OK. NO API NO ON WELL SIGN. RULES: 19.15.25.8 & 19.15.16.8 VIOLATION PICTURES TAKEN

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ELK STATE 002 N-16-18S-28E 30-015-24578-00-Inspection No. iTWG1716347440 **Inspection Date:** 6/12/2017 1:10:36 PM Corrective Action Due by: 9/15/2017 **Type Inspection** Inspector Violation? \*Significant Non-Compliance? Routine/Periodic Tim Gum Yes No IDLE WELL -- LRP---12/13. PJ.PO. TBG ? FLOWLINE VALVE CLOSED. OSCVO. **Comments on Inspection:** WRONG OPERATOR NAME WELL SIGN. NO WELL DATA. . FLOWLINE TO THE ACTIVE ELK ST NO. WELL AND BTTY. RULES: 19.15.25.8 & 19.15.16.8 VIOLATION PICTURES TAKEN. 30-015-31571-00-**TRIGG FEDERAL 004** O-26-17S-27E Inspection No. iTWG1716550714 6/14/2017 2:04:46 PM Corrective Action Due by: 9/17/2017 **Inspection Date:** Inspector Violation? \*Significant Non-**Type Inspection Compliance?** Routine/Periodic Tim Gum Yes No IDLE WELL -- LAST REPORTED PRODUCTION -12/15. PJ.PO. BTTY -EQUIPMENT **Comments on Inspection:** -4 TKS NO WIND SOCK & 1 HT , TRANSFER PUMP IN SMALL TK. 1 FLOAT W/ WT TK & 1 INACTIVE TK ON LOCATION WRONG API NO ON WELL SIGN: 30-015-20116. WELL MISS-SPOTTED IN GIS. RULES: 19.15.25.8 & 19.15.16.8 VIOLATION PICTURES TAKEN.

Thank you for your prompt attention to this matter and your efforts in helping to protect our environment and the infra-

structure of the oil and gas industry.

Sincerely,

m W. Dum

Artesia OCD District Office

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