## State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez Governor

Ken McQueen Cabinet Secretary

Matthias Sayer Deputy Cabinet Secretary **David Catanach** Division Director



\*Response Required - Deadline Enclosed\*

Field Inspection Program
"Preserving the Integrity of Our Environment"

11-Jan-18

## DEVON ENERGY PRODUCTION COMPANY, LP

PO Box 250 Artesia NM 88210

## **LETTER OF VIOLATION - Inspection**

Dear Operator:

The following inspection(s) indicate that the well, equipment, location or operational status of the well(s) failed to meet standards of the New Mexico Oil Conservation Division as described in the detail section below. To comply with standards imposed by Rules and Regulations of the Division, corrective action must be taken immediately and the situation brought into compliance. The detail section indicates preliminary findings and/or probable nature of the violation. This determination is based on an inspection of your well or facility by an inspector employed by the Oil Conservation Division on the date(s) indicated.

Please notify the proper district office of the Division, in writing, of the date corrective actions are scheduled to be made so that arrangements can be made to reinspect the well and/or facility.

			INSPECTIO	N DETAIL	SECTION		
TODD 15 K FEDERAL Inspection Date Type Inspection		No.011 Inspector		Violation?	K-15-23S-31E *Significant Non-Compliance?	30-015-32154-00-0 Corrective Action Due By:	) Inspection No.
01/11/2018	Routine/Perio Violations General Houseke		Tony Morales	Yes	No	4/16/2018	iTM1801146066
Comments	on Inspection:	OK. All Equipm 19.15.10.8	nent and Location in	n Good Shape.	PJ. STAINING	G AROUND WELL H	EAD
TODD 22 H FEDERAL No.008 Inspection Date Type Inspection			Inspector	Violation?	H-22-23S-31E *Significant Non-Compliance?	30-015-32729-00- Corrective Action Due By:	00 Inspection No.
01/11/2018	Routine/Perio Violations General Houseke		Tony Morales	Yes	No	4/16/2018	iTM1801143397
Comments	on Inspection:	OK. All Equipm 19.15.10.8	nent and Location ir	n Good Shape	PJ. STAINING	G AROUND WELL H	EAD

TODD 22 I FEDERAL No.009 Inspection Date Type Inspection			Inspector Violation?	I-22-23S-31E *Significant Non-Compliance?	30-015-32730-00-( Corrective Action Due By:	)0 Inspection No.	
01/11/2018	Routine/Peri Violations General Housek	odic	Tony Morales	Yes	No	4/16/2018	iTM1801142236
Comments o	on Inspection:		ment and Location in	Good Shape.	PJ. STAINING	G AROUND WELL H	EAD
TODD 23 M FEDERAL No.022					M-23-23S-31E 30-015-32800-00-00		
Inspection Date	Type Inspectio	on	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
01/11/2018	Routine/Peri Violations		Tony Morales	Yes	No	4/16/2018	iTM1801141882
		ment and Location in FAGGED 19.15.10.		e. PJ. STAINING AROUND WELL HEAD		EAD	
TODD 15 O	FEDERAL N	No.015			O-15-23S-31E	30-015-32879-00-0	00
Inspection Date	Type Inspectio	n	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
01/11/2018	Routine/Peri Violations	odic	Tony Morales	Yes	No	4/16/2018	iTM1801146534
Comments o	General Housek on Inspection:	ceeping (Rule 114) OK. All Equipt POWER OFF	ment and Location in 19.15.10.8	Good Shape.	PJ. STAINING	G AROUND WELL H	EAD
TODD 23 E	FEDERAL N	No.020T			E-23-23S-31E	30-015-33948-00-0	00
Inspection Date	Type Inspectio	n	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
01/11/2018	Routine/Peri Violations		Tony Morales	Yes	Non-Compliance? No	4/16/2018	iTM1801142987
	General Housek	ceeping (Rule 114)					
Comments of	on Inspection:		ment and Location in 19.15.10.8	i Good Shape.	PJ. STAINING	G AROUND WELL H	EAD
TODD 27 K	on Inspection: FEDERAL I	OK. All Equip POWER OFF		Good Shape.	K-27-23S-31E	30-015-34431-00-0	<u> </u>
	-	OK. All Equip POWER OFF No.011		Good Shape.	K-27-23S-31E *Significant	30-015-34431-00-0 Corrective	<u> </u>
TODD 27 K Inspection Date	FEDERAL I Type Inspectic Routine/Peri Violations	OK. All Equip POWER OFF No.011 on iodic	19.15.10.8		K-27-23S-31E	30-015-34431-00-0	00 Inspection No.
TODD 27 K Inspection Date 01/11/2018	FEDERAL I Type Inspectic Routine/Peri Violations	OK. All Equip POWER OFF No.011 on iodic sceping (Rule 114) OK. All Equip	19.15.10.8 Inspector Tony Morales ment and Location ir	Violation? Yes	K-27-23S-31E *Significant Non-Compliance? No	<b>30-015-34431-00-</b> Corrective Action Due By: 4/16/2018 G AROUND WELL H	00 Inspection No. iTM1801138119
TODD 27 K Inspection Date 01/11/2018 Comments of TODD 23 L	FEDERAL I Type Inspectio Routine/Peri Violations General Housek	OK. All Equip POWER OFF No.011 on odic seeping (Rule 114) OK. All Equip TANK BATTE	19.15.10.8 Inspector Tony Morales ment and Location ir	Violation? Yes	K-27-23S-31E *Significant Non-Compliance? No PJ. STAINING INATED MATERIAI	30-015-34431-00-0 Corrective Action Due By: 4/16/2018 G AROUND WELL H L ON LOCATION 30-015-35034-00-0	00 Inspection No. iTM1801138119 IEAD
TODD 27 K Inspection Date 01/11/2018 Comments of TODD 23 L Inspection	FEDERAL I Type Inspectio Routine/Peri Violations General Housek on Inspection: FEDERAL N	OK. All Equip POWER OFF No.011 on iodic eceping (Rule 114) OK. All Equip TANK BATTE No.021	19.15.10.8 Inspector Tony Morales ment and Location ir ERIES OK 19.15.10	Violation? Yes	K-27-23S-31E *Significant Non-Compliance? No . PJ. STAINING INATED MATERIA L-23-23S-31E *Significant	30-015-34431-00-0 Corrective Action Due By: 4/16/2018 G AROUND WELL H L ON LOCATION 30-015-35034-00-0 Corrective	00 Inspection No. iTM1801138119 IEAD
TODD 27 K Inspection Date 01/11/2018 Comments of TODD 23 L	FEDERAL I Type Inspection Routine/Peri Violations General Housek on Inspection: FEDERAL N Type Inspection Routine/Peri Violations	OK. All Equip POWER OFF No.011 on iodic ecceping (Rule 114) OK. All Equip TANK BATTE No.021 on	19.15.10.8 Inspector Tony Morales ment and Location ir	Violation? Yes 1 Good Shape 8 CONTAM	K-27-23S-31E *Significant Non-Compliance? No PJ. STAINING INATED MATERIAI	30-015-34431-00-0 Corrective Action Due By: 4/16/2018 G AROUND WELL H L ON LOCATION 30-015-35034-00-0	00 Inspection No. iTM1801138119 IEAD 00 Inspection No.
TODD 27 K Inspection Date 01/11/2018 Comments of TODD 23 L Inspection Date 01/11/2018	FEDERAL I Type Inspection Routine/Peri Violations General Housek on Inspection: FEDERAL N Type Inspection Routine/Peri Violations	OK. All Equip POWER OFF No.011 on odic ecceping (Rule 114) OK. All Equip TANK BATTE No.021 on iodic	19.15.10.8 Inspector Tony Morales ment and Location ir ERIES OK 19.15.10 Inspector Tony Morales ment and Location ir	Violation? Yes a Good Shape 8 CONTAM Violation? Yes	K-27-23S-31E *Significant Non-Compliance? No PJ. STAINING INATED MATERIA L-23-23S-31E *Significant Non-Compliance? No	30-015-34431-00-0 Corrective Action Due By: 4/16/2018 G AROUND WELL H L ON LOCATION 30-015-35034-00-0 Corrective Action Due By:	00 Inspection No. iTM1801138119 IEAD 00 Inspection No. iTM1801142548
TODD 27 K Inspection Date 01/11/2018 Comments of TODD 23 L Inspection Date 01/11/2018 Comments of	FEDERAL I Type Inspectio Routine/Peri Violations General Housek on Inspection: FEDERAL N Type Inspectio Routine/Peri Violations General Housek	OK. All Equip POWER OFF No.011 on iodic seeping (Rule 114) OK. All Equip TANK BATTE No.021 on iodic seeping (Rule 114) OK. All Equip POWER OFF	19.15.10.8 Inspector Tony Morales ment and Location ir ERIES OK 19.15.10 Inspector Tony Morales ment and Location ir	Violation? Yes a Good Shape 8 CONTAM Violation? Yes	K-27-23S-31E *Significant Non-Compliance? No PJ. STAINING INATED MATERIA L-23-23S-31E *Significant Non-Compliance? No	30-015-34431-00-0 Corrective Action Due By: 4/16/2018 G AROUND WELL H L ON LOCATION 30-015-35034-00-0 Corrective Action Due By: 4/16/2018	00 Inspection No. iTM1801138119 IEAD 00 Inspection No. iTM1801142548 IEAD
TODD 27 K Inspection Date 01/11/2018 Comments of TODD 23 L Inspection Date 01/11/2018 Comments of TODD 27 C Inspection	FEDERAL I Type Inspection Routine/Peri Violations General Housek on Inspection: FEDERAL N Type Inspection Routine/Peri Violations General Housek on Inspection:	OK. All Equip POWER OFF No.011 on iodic seeping (Rule 114) OK. All Equip TANK BATTE No.021 on iodic seeping (Rule 114) OK. All Equip POWER OFF No.003	19.15.10.8 Inspector Tony Morales ment and Location ir ERIES OK 19.15.10 Inspector Tony Morales ment and Location ir 19.15.10.8	Violation? Yes a Good Shape 8 CONTAM Violation? Yes	K-27-23S-31E *Significant Non-Compliance? NO PJ. STAINING INATED MATERIAL L-23-23S-31E *Significant Non-Compliance? NO PJ. STAINING C-27-23S-31E *Significant	30-015-34431-00-0 Corrective Action Due By: 4/16/2018 G AROUND WELL H L ON LOCATION 30-015-35034-00-0 Corrective Action Due By: 4/16/2018 G AROUND WELL H 30-015-35516-00-0 Corrective	00 Inspection No. iTM1801138119 IEAD 00 Inspection No. iTM1801142548 IEAD
TODD 27 K Inspection Date 01/11/2018 Comments of TODD 23 L Inspection Date 01/11/2018 Comments of TODD 27 C	FEDERAL I Type Inspection Routine/Peri Violations General Housek on Inspection: FEDERAL N Type Inspection Routine/Peri Violations General Housek on Inspection:	OK. All Equip POWER OFF No.011 on iodic ecceping (Rule 114) OK. All Equip TANK BATTE No.021 on iodic ecceping (Rule 114) OK. All Equip POWER OFF No.003 on	19.15.10.8 Inspector Tony Morales ment and Location ir ERIES OK 19.15.10 Inspector Tony Morales ment and Location ir	Violation? Yes a Good Shape 8 CONTAM Violation? Yes a Good Shape	K-27-23S-31E *Significant Non-Compliance? NO PJ. STAINING INATED MATERIA L-23-23S-31E *Significant Non-Compliance? NO PJ. STAINING C-27-23S-31E	30-015-34431-00-0 Corrective Action Due By: 4/16/2018 G AROUND WELL H L ON LOCATION 30-015-35034-00-0 Corrective Action Due By: 4/16/2018 G AROUND WELL H 30-015-35516-00-0	00 Inspection No. iTM1801138119 IEAD 00 Inspection No. iTM1801142548 IEAD 00 Inspection No.
TODD 27 K Inspection Date 01/11/2018 Comments of TODD 23 L Inspection Date 01/11/2018 Comments of TODD 27 C Inspection Date	FEDERAL I Type Inspectio Routine/Peri Violations General Housek on Inspection: FEDERAL N Type Inspectio Routine/Peri Violations General Housek on Inspection: FEDERAL N Type Inspectio Routine/Peri Violations	OK. All Equip POWER OFF No.011 on iodic ecceping (Rule 114) OK. All Equip TANK BATTE No.021 on iodic ecceping (Rule 114) OK. All Equip POWER OFF No.003 on	19.15.10.8 Inspector Tony Morales ment and Location ir ERIES OK 19.15.10 Inspector Tony Morales ment and Location ir 19.15.10.8 Inspector	Violation? Yes a Good Shape 8 CONTAM Violation? Yes a Good Shape Violation?	K-27-23S-31E *Significant Non-Compliance? No PJ. STAINING INATED MATERIA L-23-23S-31E *Significant Non-Compliance? No C-27-23S-31E *Significant Non-Compliance?	30-015-34431-00-0 Corrective Action Due By: 4/16/2018 G AROUND WELL H L ON LOCATION 30-015-35034-00-0 Corrective Action Due By: 4/16/2018 G AROUND WELL H 30-015-35516-00-0 Corrective Action Due By:	00 Inspection No. iTM1801138119 IEAD 00 Inspection No. iTM1801142548 IEAD

TODD 27 F Inspection Date	FEDERAL N Type Inspection		Inspector	Violation?	F-27-23S-31E *Significant Non-Compliance?	30-015-35518-00- Corrective Action Due By:	00 Inspection No.
01/11/2018	Routine/Peri Violations General Housek	odic eeping (Rule 114)	Tony Morales	Yes	No	4/16/2018	iTM1801139459
Comments	on Inspection:	OK. All Equipn 19.15.10.8	nent and Location in	Good Shape.	PJ. STAINING	G AROUND WELL H	IEAD
	FEDERAL N	No.001			A-22-23S-31E	30-015-36828-00-	00
Inspection Date	Type Inspectio	on	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
01/11/2018	Routine/Peri Violations General Housek	odic eeping (Rule 114)	Tony Morales	Yes	No	4/16/2018	iTM1801144740
Comments	on Inspection:		nent and Location in	Good Shape	PJ. STAININ	G AROUND WELL H	IEAD

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,

0 'sel 600 Jones 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.