

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

**IN RE: NOTICE OF VIOLATION ISSUED TO BENTON CRUDE OIL, LLC**

**OGRID # 331974**

**CASE NO. 25922**

**MOTION TO DISMISS AND VACATE HEARING**

The New Mexico Oil Conservation Division (“Division”) and Benton Crude Oil, LLC (collectively “Parties”), hereby request that the Division dismiss the above-referenced matter and vacate the May 5, 2026 hearing. As grounds for the dismissal, the Parties state that they have reached an agreement on an SFO, attached hereto as Exhibit A. Exhibit B is a proposed Order.

Respectfully submitted,



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Michael Hall  
Assistant General Counsel  
New Mexico Energy, Minerals and  
Natural Resources Department  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
Phone: (505) 479-1137  
Michael.Hall@emnrd.nm.gov  
*Attorney for The Oil Conservation Division*

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was electronically mailed to the following party on May 4, 2026:

**Benton Crude Oil, LLC**

[rachel8465@gmail.com](mailto:rachel8465@gmail.com)

[Bentoncrudeoil25@gmail.com](mailto:Bentoncrudeoil25@gmail.com)

A handwritten signature in black ink, appearing to read "Michael Hall", is positioned above a horizontal line.

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Michael Hall

# EXHIBIT A

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

**IN RE: NOTICE OF VIOLATION ISSUED TO BENTON CRUDE OIL, LLC**

**OGRID # 331974**

**CASE NO. 25922**

**STIPULATED FINAL ORDER**

Pursuant to the New Mexico Oil and Gas Act ("Act"), NMSA 1978, Section 70-2-1, *et seq.*, and 19.15.5.10(C) NMAC, the Director of the Oil Conservation Division ("OCD") and Benton Crude Oil, LLC ("Operator"), OGRID # 329319, enter into this Stipulated Final Order ("SFO") to resolve a Notice of Violation ("NOV").

1. OCD is charged with the administration and enforcement of the Oil and Gas Act and its rules and has jurisdiction over Operator and its wells in the state of New Mexico.
2. Operator operates under OGRID # 329319.
3. Operator had failed to submit required monthly reporting of C-115 production reports, as set out more thoroughly in the NOV, a true and correct copy of which is attached hereto as **Exhibit A**.
4. Operator is the responsible party for all required reporting.
5. OCD is authorized to impose sanctions for violations of the Oil and Gas Act and its rules, including denial or revocation of registrations, applications, permits, authorizations and transfers, and the assessment of civil penalties. *See* 19.15.5.10 NMAC.
6. Operator requests this SFO to avoid sanctions for violating the Oil and Gas Act and the specific violations set out more thoroughly in the NOV, which is hereby incorporated by reference.

7. Operator admits the violations alleged in the NOV and waives any right to appeal from this SFO.

8. Additionally, Operator agrees to:

a. Have all unfiled C-115 reports and any other required reporting completed by April 30, 2026. Each well subject to the NOV shall be produced or properly plugged and abandoned by April 30, 2026.

b. Pay a civil penalty of \$15,000.00. Operator may pay out the \$15,000.00 in the following manner:

1. The first payment of \$3,000.00 shall be paid on or before May 1, 2026;

2. The second payment of \$3,000.00 shall be paid on or before June 1, 2026;

3. The third payment of \$3,000.00 shall be paid on or before July 1, 2026;

4. The fourth payment of \$3,000.00 shall be paid on or before August 1, 2026; and

5. The fifth and final payment of \$3,000.00 shall be paid on or before September 1, 2026.

c. Payments shall be made to the State of New Mexico, Oil Conservation Division and sent to the attention of the Melissa Shelley.

9. Operator admits to OCD's jurisdiction to file the NOV, consents to the relief specified herein, and waives the right to review by the Oil Conservation Commission or other judicial relief.

10. The person executing this SFO on behalf of Operator represents that they have the requisite authority to bind Operator to the provisions of this SFO and that such representation shall be legally sufficient to evidence their actual or apparent authority.

11. This Order only satisfies the violations set out in the NOV attached hereto as Exhibit A. This Order shall not be construed to relieve the Operator from other regulatory compliance with OCD or resolve liability with any other regulatory authority or agency.
12. Notwithstanding the foregoing provisions, OCD reserves the right to sanction Operator for any alleged violation not addressed in this Order.
13. Should Operator fail to meet any deadline in this SFO, OCD may immediately plug and abandon, restore, and/or remediate any of the wells. Operator agrees that it will forfeit any financial assurance associated with any well which is plugged and abandoned by OCD.
14. This SFO shall not be construed as a resolution or to absolve Operator from any costs or liabilities associated with the plugging and abandonment, restoration, or remediation of a well by OCD. Operator is liable for any and all costs associated with the plugging and abandonment, restoration, and/or remediation on Operator's wells incurred by OCD.
15. Operator may request an extension of any deadline in this SFO from OCD. OCD, at its sole discretion, may grant such extension if good cause is shown.
16. This Order will remain in full force and effect as to all successors-in-interest of Operator, including, but not limited to, any entity or entities that procure or acquire from Operator individual wells or sites referenced in the NOV that resulted in this Order or that are found in Exhibit A to this Order. Operator shall provide a copy of this Order, including Exhibit A, to any entity to which Operator intends to transfer assets covered by this Order or any entity that is otherwise a successor-in-interest of Operator.
17. This SFO becomes effective on the date of final execution by the OCD Director.

NEW MEXICO OIL CONSERVATION DIVISION

*Albert Chang*

4/16/2026

Albert C.S. Chang, Director

Date

OPERATOR, BENTON CRUDE OIL, LLC

*Ty Guffey*

Signature

4/14/26

Date

Ty Guffey

Printed Name

EXHIBIT A

State of New Mexico  
Energy, Minerals and Natural Resources Department

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**Michelle Lujan-Grisham**  
Governor

**Erin Taylor**  
Acting Cabinet Secretary

**Ben Shelton**  
Deputy Secretary

**Albert C.S. Chang**  
Division Director  
Oil Conservation Division



**BY CERTIFIED MAIL AND ELECTRONIC MAIL**

January 20, 2026

Benton Crude Oil, LLC  
2201 Menaul Blvd NE Ste A  
Albuquerque, NM 87107

Ty Guffey, Manager  
[Bentoncrudeoil25@gmail.com](mailto:Bentoncrudeoil25@gmail.com)

**NOTICE OF VIOLATION**

The Director of the Oil Conservation Division (“OCD”) issues this Notice of Violation (“NOV”) pursuant to 19.15.5.10 NMAC.

1. **Alleged Violator:** Benton Crude Oil LLC, OGRID # 331974 (“Operator”).
2. **Factual and Legal Basis for Alleged Violation(s):**

Operator is the registered operator of thirty-six (36) wells. The thirty-six (36) wells identified in **Exhibit A** have been continuously inactive since at least February 2024, and therefore out of compliance with 19.15.25.8 NMAC and are not already subject to an agreed compliance or final order.

These alleged facts constitute violations of the following:

***19.15.25.8 NMAC:***

A. *The operator of wells drilled for oil or gas or services wells including seismic, core, exploration or injection wells, whether cased or uncased, shall plug the wells as Subsection B of 19.15.25.8 NMAC requires.*

B. *The operator shall either properly plug and abandon a well or place the well in approved temporary abandonment in accordance with 19.15.25 NMAC within 90 days after:*

1. *a 60 day period following suspension of drilling operations;*

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2. *a determination that a well is no longer usable for beneficial purposes; or*
3. *a period of one year in which a well has been continuously inactive.*

**19.15.5.9(A) NMAC:**

*An operator is in compliance with Subsection A of 19.15.5.9 NMAC if the operator...*

4. *has no more than the following number of wells out of compliance with 19.15.25.8 NMAC that are not subject to an agreed compliance or final order setting a schedule for bringing the wells into compliance with 19.15.25.8 NMAC and imposing sanctions if the schedule is not met:*
  - (a) *two wells or fifty percent of the wells the operator operates, whichever is less, if the operator operates 100 wells or less;*
  - (b) *five wells if the operator operates between 101 and 500 wells;*
  - (c) *seven wells if the operator operates between 501 and 1000 wells;*  
*and*
  - (d) *10 wells if the operator operates more than 1000 wells.*

3. **Compliance:** No later than thirty (30) days after receipt of this NOV, Operator shall:

- a. plug and abandon the thirty-six (36) well listed in **Exhibit A**.

4. **Sanction(s):** OCD may impose one or more of the following sanctions:

- a. civil penalty;
- b. modification, suspension, cancellation, or termination of a permit or authorization;
- c. plugging and abandonment of well(s);
- d. remediation and restoration of well location(s) and associated facilities, including the removal of surface and subsurface equipment and other materials;
- e. remediation and restoration of location(s) affected by a spill or release;
- f. forfeiture of financial assurance;
- g. shutting in well(s); and
- h. any other remedy authorized by law.

For the alleged violations described above, OCD proposes the following sanctions:

- a. **Plug and Abandon Wells:** OCD will request an order requiring Operator to plug and abandon wells listed in **Exhibit A**, and/or an order authorizing OCD to plug and abandon those wells.
- b. **Termination of Authorization to Transport:** OCD will request an order terminating Operator's authority to transport from all wells listed in **Exhibit A**.
- c. **Civil Penalties:** OCD proposes to assess civil penalties as specified below. The civil penalty calculations are attached. OCD has taken into consideration the alleged

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violator's good faith effort (or lack thereof) to comply with the applicable requirements. Copies of the civil penalty calculations are attached as **Exhibit B**.

Civil Penalty: \$16,200.00

5. **Informal resolution**: A process is available to informally discuss and resolve the NOV. This process will run for 30 days from the date of your receipt of this letter. To initiate this process, contact the OCD employee identified at the end of this letter.

6. **Hearing**: OCD will docket this matter for March 5, 2026, at which time this case will move forward to a formal hearing should informal resolution be unsuccessful. Please see 19.15.5.10 NMAC for more information regarding the hearing.

For more information regarding this NOV, contact Michael Hall at (505) 479-1137 or [Michael.Hall@emnrd.nm.gov](mailto:Michael.Hall@emnrd.nm.gov)

Regards,



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Albert C.S. Chang  
Director, Oil Conservation Division

cc: Office of General Counsel, EMNRD

# EXHIBIT A

# Inactive Well List

Total Well Count: 36 Inactive Well Count: 36

Printed On: Monday, December 29 2025

District	API	Well	UL STR	OCU Unit	Ogrid	Operator	Lease Type	Surface Owner	Well Type	Last Production	Formation/Notes	Status	TA Exp Date
1	30-025-11445	HUMPHREY QUEEN UNIT #001	1-04-25S-37E	A	331974	Benton Crude Oil LLC	P	P	O	02/2024			
1	30-025-11422	HUMPHREY QUEEN UNIT #002	4-03-25S-37E	D	331974	Benton Crude Oil LLC	P	P	I	02/2024			
1	30-025-11421	HUMPHREY QUEEN UNIT #003	3-03-25S-37E	C	331974	Benton Crude Oil LLC	P	P	O	02/2024			
1	30-025-11431	HUMPHREY QUEEN UNIT #005	1-03-25S-37E	A	331974	Benton Crude Oil LLC	F	P	O	02/2024			
1	30-025-11446	HUMPHREY QUEEN UNIT #007	H-04-25S-37E	H	331974	Benton Crude Oil LLC	P	P	O	02/2024			
1	30-025-11424	HUMPHREY QUEEN UNIT #010	G-03-25S-37E	G	331974	Benton Crude Oil LLC	P	P	O	02/2024			
1	30-025-11432	HUMPHREY QUEEN UNIT #011	H-03-25S-37E	H	331974	Benton Crude Oil LLC	F	P	O	08/2023			
1	30-025-23184	HUMPHREY QUEEN UNIT #012	H-03-25S-37E	H	331974	Benton Crude Oil LLC	F	P	O	02/2024			
1	30-025-20612	HUMPHREY QUEEN UNIT #016	K-03-25S-37E	K	331974	Benton Crude Oil LLC	P	P	O	03/2024			
1	30-025-11426	HUMPHREY QUEEN UNIT #017	J-03-25S-37E	J	331974	Benton Crude Oil LLC	P	P	I	02/2024	SEVEN RIVERS-QUEEN		
1	30-025-21196	HUMPHREY QUEEN UNIT #021	M-03-25S-37E	M	331974	Benton Crude Oil LLC	P	P	O	02/2024	04/02/2008 RETURN TO PROD		
1	30-025-11430	HUMPHREY QUEEN UNIT #022	N-03-25S-37E	N	331974	Benton Crude Oil LLC	P	P	O	02/2024			
1	30-025-11427	HUMPHREY QUEEN UNIT #024	O-03-25S-37E	O	331974	Benton Crude Oil LLC	F	P	O	02/2024			
1	30-025-11434	HUMPHREY QUEEN UNIT #025	P-03-25S-37E	P	331974	Benton Crude Oil LLC	F	P	O	08/2023			
1	30-025-23899	HUMPHREY QUEEN UNIT #026	J-03-25S-37E	J	331974	Benton Crude Oil LLC	P	P	O	02/2024			
1	30-025-23968	HUMPHREY QUEEN UNIT #029	3-03-25S-37E	C	331974	Benton Crude Oil LLC	P	P	O	02/2024			
1	30-025-28012	HUMPHREY QUEEN UNIT #030	E-03-25S-37E	E	331974	Benton Crude Oil LLC	P	P	O	02/2024			
1	30-025-28013	HUMPHREY QUEEN UNIT #031	N-03-25S-37E	N	331974	Benton Crude Oil LLC	P	P	I	02/2024	04/02/2008 RETURN TO PROD		
1	30-025-11522	LANGLIE MATTIX QUEEN UNIT #004	N-10-25S-37E	N	331974	Benton Crude Oil LLC	P	P	O	02/2024	04/02/2008 RETURN TO PROD		
1	30-025-11517	LANGLIE MATTIX QUEEN UNIT #006	O-10-25S-37E	O	331974	Benton Crude Oil LLC	P	P	O	02/2024			
1	30-025-11518	LANGLIE MATTIX QUEEN UNIT #007	P-10-25S-37E	P	331974	Benton Crude Oil LLC	P	P	I	02/2024			
1	30-025-23863	LANGLIE MATTIX QUEEN UNIT #009	P-10-25S-37E	P	331974	Benton Crude Oil LLC	P	P	O	02/2024			
1	30-025-11603	LANGLIE MATTIX QUEEN UNIT #010	C-15-25S-37E	C	331974	Benton Crude Oil LLC	P	P	O	02/2024			
1	30-025-11607	LANGLIE MATTIX QUEEN UNIT #011	B-15-25S-37E	B	331974	Benton Crude Oil LLC	P	P	I	03/2024	RWTI 08/12/2011		
1	30-025-11609	LANGLIE MATTIX QUEEN UNIT #012	A-15-25S-37E	A	331974	Benton Crude Oil LLC	P	P	O	02/2024			
1	30-025-11601	LANGLIE MATTIX QUEEN UNIT #019	J-15-25S-37E	J	331974	Benton Crude Oil LLC	P	P	I	02/2024			
1	30-025-11599	LANGLIE MATTIX QUEEN UNIT #020	I-15-25S-37E	I	331974	Benton Crude Oil LLC	P	P	O	02/2024			
1	30-025-23186	LANGLIE MATTIX QUEEN UNIT #022	N-15-25S-37E	N	331974	Benton Crude Oil LLC	F	P	I	02/2024	SI STATUS RWTI 08/23/2011		
1	30-025-11600	LANGLIE MATTIX QUEEN UNIT #024	O-15-25S-37E	O	331974	Benton Crude Oil LLC	P	P	O	02/2024			
1	30-025-11596	LANGLIE MATTIX QUEEN UNIT #027	M-14-25S-37E	M	331974	Benton Crude Oil LLC	F	P	I	02/2024			
1	30-025-11695	LANGLIE MATTIX QUEEN UNIT #029	B-22-25S-37E	B	331974	Benton Crude Oil LLC	P	P	O	02/2024			
1	30-025-23300	LANGLIE MATTIX QUEEN UNIT #032	G-22-25S-37E	G	331974	Benton Crude Oil LLC	P	P	I	02/2024			
1	30-025-11689	LANGLIE MATTIX QUEEN UNIT #034	H-22-25S-37E	H	331974	Benton Crude Oil LLC	P	P	O	02/2024			
1	30-025-23780	LANGLIE MATTIX QUEEN UNIT #037	K-15-25S-37E	K	331974	Benton Crude Oil LLC	F	P	O	02/2024			
1	30-025-23766	LANGLIE MATTIX QUEEN UNIT #038	O-15-25S-37E	O	331974	Benton Crude Oil LLC	P	P	O	02/2024	LANGLIE MATTIX; SEVEN RIVERS QUEEN		
1	30-025-30747	LANGLIE MATTIX QUEEN UNIT #041	A-15-25S-37E	A	331974	Benton Crude Oil LLC	P	P	O	02/2024			

## EXHIBIT B



## EXHIBIT B

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

**IN RE: NOTICE OF VIOLATION ISSUED TO BENTON CRUDE OIL, LLC**

**OGRID # 331974**

**CASE NO. 25922**

**ORDER DISMISSING CASE AND VACATING HEARING**

**NOW**, having considered the New Mexico Oil Conservation Division's Motion Dismiss and Vacate Hearing in the above-referenced case, it is hereby **ORDERED** that this case is dismissed and the hearing vacated.

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**PRESIDING HEARING OFFICER**