State Of New Mexico Energy, Minerals and Natural Resources Department

07-Aug-24

OWL SWD OPERATING, LLC

Pre Enforcement Notification

20 Greenway Plaza Suite 500 Houston, TX 77046

Dear Operator:

The following inspection indicates that the well, equipment, location or operational status of the well 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 indicated.

Please notify the Compliance Officer copied on this letter, 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.

INSPECTION DETAIL SECTION

[30-025-36004] LOTUS SWD #001 OGRID: 308339 A-32-22S-32E 660 FNL 660 FEL

Inspection DateType InspectionInspectorInspection No.8/7/2024Routine Inspection[GR] Gary RobinsoniGR2422035974

Violation Title Corrective Action Due

cGR2422039532 19.15.26 Injection Detection of Deficient Mechanical Integrity 11/5/2024

(FAILED 2024 UIC testing, well has not been repaired since 2022 failure. WELL IS TO STAY SHUT IN.)

cGR2422039533 19.15 Oil and Gas Mechanical Integrity Failure Recorded 11/5/2024

(Auto Generated Violation - MIT Failure exits.)

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.

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

Oil Conservation Division * 1625 N. French Drive * Hobbs, NM 88240 Phone: 575-393-6161 * Fax: 575-393-0720 * www.emnrd.nm.gov