

State Of New Mexico
Energy, Minerals and Natural Resources Department

07-Aug-24

OWL SWD OPERATING, LLC

20 Greenway Plaza
Suite 500
Houston, TX 77046

Pre Enforcement Notification

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

[30-025-37799] LOTUS SWD #012

OGRID: 308339

B-32-22S-32E 330 FNL 2310 FEL

Inspection Date	Type Inspection	Inspector	Inspection No.
8/7/2024	Routine Inspection	[GR] Gary Robinson	iGR2422038186
Violation	Title		Corrective Action Due
cGR2422039279	19.15.26 Injection Pressure exceeds permit pressure (<i>FAILED 2024 UIC testing, well has not been repaired since 2023 failure. Well had high injection pressure and nothing has been done to drop pressure. WELL IS TO STAY SHUT IN.</i>)		11/5/2024
cGR2422039280	19.15.26 Injection Detection of Deficient Mechanical Integrity (<i>FAILED 2024 UIC testing, well has not been repaired since 2023 failure. Well had high injection pressure and nothing has been done to drop pressure. WELL IS TO STAY SHUT IN.</i>)		11/5/2024
cGR2422039281	19.15 Oil and Gas Mechanical Integrity Failure Recorded (<i>Auto Generated Violation - MIT Failure exits.</i>)		11/5/2024

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