

State of New Mexico  
Energy, Minerals and Natural Resources Department

Susana Martinez  
Governor

David Martin  
Cabinet Secretary

Tony Delfin  
Deputy Cabinet Secretary

David Catanach, Director  
Oil Conservation Division



**\*Response Required - Deadline Enclosed\***

*Field Inspection Program*  
*"Preserving the Integrity of Our Environment"*

18-Jul-16

GFG OPERATING LLC  
4701 TEAKWOOD TRACE  
MIDLAND TX 79707

**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.

**INSPECTION DETAIL SECTION**

TOOMEY ALLEN No.004				J-28-18S-28E	30-015-02097-00-00		
Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.	
07/18/2016	Routine/Periodic	Tony Morales	Yes	No	10/21/2016	iTM1620046500	
<b>Violations</b>							
Absent Well Identification Signs (Rule 103)							
General Housekeeping (Rule 114)							
<b>Comments on Inspection:</b>		OK. All Equipment and Location in Good Shape. PJ. STAINING AROUND WELL HEAD. LOCATION SIGN NOT VISIBLE					

TOOMEY ALLEN No.006				I-28-18S-28E	30-015-02099-00-00		
Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.	
07/18/2016	Routine/Periodic	Tony Morales	Yes	No	10/21/2016	iTM1620045047	
<b>Violations</b>							
Absent Well Identification Signs (Rule 103)							
General Housekeeping (Rule 114)							
<b>Comments on Inspection:</b>		OK. All Equipment and Location in Good Shape. PJ. LOCATION SIGN NOT VISIBLE. STAINING AROUND WELL HEAD STAINED AREA APPROX 25' X 60'					

**TOOMEY ALLEN No.007**

O-28-18S-28E

30-015-02100-00-00

Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
07/18/2016	Routine/Periodic	Tony Morales	Yes	No	10/21/2016	iTM1620048780
Violations						
Absent Well Identification Signs (Rule 103)						
General Housekeeping (Rule 114)						

**Comments on Inspection:** OK. All Equipment and Location in Good Shape. PJ. STAINING AROUND WELL HEAD. OLD TUBING ON LOCATION LOCATION SIGN NOT VISBLE.

**TOOMEY ALLEN No.009**

J-28-18S-28E

30-015-02103-00-00

Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
07/18/2016	Routine/Periodic	Tony Morales	Yes	No	10/21/2016	iTM1620044081
Violations						
Tank Battery Equipment (Rules 114, 115)						
Fire Walls and Dikes						
General Housekeeping (Rule 114)						

**Comments on Inspection:** OK. All Equipment and Location in Good Shape. PJ. TANK BATTERY NO CONTAINMENT STAINING TANK BATTERY HOLES

**TOOMEY ALLEN No.008**

O-28-18S-28E

30-015-06113-00-00

Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
07/18/2016	Routine/Periodic	Tony Morales	Yes	No	10/21/2016	iTM1620047121
Violations						
Absent Well Identification Signs (Rule 103)						
General Housekeeping (Rule 114)						

**Comments on Inspection:** OK. All Equipment and Location in Good Shape. PJ STAINING AROUND WELL HEAD FRESH OIL LOCATION SIGN. NOT VISIBLE.

**TOOMEY ALLEN No.017**

O-28-18S-28E

30-015-24448-00-00

Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
07/18/2016	Routine/Periodic	Tony Morales	Yes	No	10/21/2016	iTM1620048494
Violations						
General Housekeeping (Rule 114)						

**Comments on Inspection:** OK. All Equipment and Location in Good Shape. PJ. STAINING AROUND WELL HEAD. OLD TUBING ON LOCATION

**TOOMEY ALLEN No.018**

I-28-18S-28E

30-015-24484-00-00

Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
07/18/2016	Routine/Periodic	Tony Morales	Yes	No	10/21/2016	iTM1620044639
Violations						
Absent Well Identification Signs (Rule 103)						
General Housekeeping (Rule 114)						
Surface Release						

**Comments on Inspection:** OK. All Equipment and Location in Good Shape. PJO. STAINING AROUND WELL HEAD. FRESH OIL ON FLOWLINE LOCATION SIGN NOT VISIBLE.

**TOOMEY ALLEN No.019**

O-28-18S-28E

30-015-24771-00-00

Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
07/18/2016	Routine/Periodic	Tony Morales	Yes	No	10/21/2016	iTM1620049206
Violations						
Absent Well Identification Signs (Rule 103)						
General Housekeeping (Rule 114)						

**Comments on Inspection:** OK. All Equipment and Location in Good Shape. PJ STAINING AROUND WELL HEAD. LOCATION SIGN NOT MOUNTED/WORN

TOOMEY ALLEN No.020

I-28-18S-28E

30-015-24967-00-00

Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
07/18/2016	Routine/Periodic	Tony Morales	Yes	No	10/21/2016	ITM1620046847
<b>Violations</b>						
Absent Well Identification Signs (Rule 103)						
General Housekeeping (Rule 114)						

**Comments on Inspection:** OK. All Equipment and Location in Good Shape. PJ STAINING AROUND WELL HEAD.  
LOCATION SIGN NOT VISIBLE.

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.

Sincerely,



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.