State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

David Martin

Cabinet Secretary

David Catanach, DirectorOil Conservation Division

Tony Delfin

Deputy Cabinet Secretary

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	
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TOOMEY ALLEN No.004

J-28-18S-28E

30-015-02097-00-00

Inspection Date

Type Inspection

Violation?

*Significant
? Non-Compliance?

Corrective
Action Due By:

Inspection No.

07/18/2016

Routine/Periodic

Tony Morales

Inspector

Yes No

10/21/2016

iTM1620046500

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 VISIBLE

TOOMEY ALLEN No.006

I-28-18S-28E

30-015-02099-00-00

Inspection Date

Type Inspection

Inspector

*Sign Violation? Non-Cor

*Significant Corr Non-Compliance? Action

Corrective
Action Due By: Insp

07/18/2016

Routine/Periodic

Tony Morales

Yes

No

10/21/2016

Inspection No. iTM1620045047

Violations

Absent Well Identification Signs (Rule 103)

General Housekeeping (Rule 114)

Comments on Inspection:

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 *Significant Corrective Type Inspection Inspector Violation? Date Inspection No. Non-Compliance? Action Due By: 07/18/2016 Routine/Periodic Tony Morales Yes iTM1620048780 No 10/21/2016 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 *Significant Corrective Type Inspection Inspector Violation? Inspection No. Date Non-Compliance? Action Due By: 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 *Significant Corrective Type Inspection Inspector Violation? Inspection No. Date Non-Compliance? Action Due By: 07/18/2016 Routine/Periodic iTM1620047121 Tony Morales Yes No 10/21/2016 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 *Significant Inspection Corrective Type Inspection Violation? Inspection No. Inspector Date Non-Compliance? Action Due By: 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 *Significant Corrective Type Inspection Violation? Inspection No. Inspector Date Non-Compliance? Action Due By: 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 30-015-24771-00-00 O-28-18S-28E

Inspection *Significant Corrective Violation? Inspection No. Type Inspection Inspector Date Non-Compliance? Action Due By: 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 Ty

Type Inspection
Routine/Periodic

Inspector

Violation?

*Significant Non-Compliance? No Corrective Action Due By:

Inspection No.

07/18/2016 Routine

Tony Morales

Yes

10/21/2016

iTM1620046847

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 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 Divison 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.