State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

David Martin

Cabinet Secretary

David Catanach, Director

Oil 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

TOOMEY ALLEN No.004 J-28-18S-28E 30-015-02097-00-00 Inspection *Significant Corrective Inspection No. Date Type Inspection Inspector Violation? Non-Compliance? Action Due By: 07/18/2016 Routine/Periodic **Tony Morales** 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 *Significant Corrective Inspection No. Type Inspection Inspector Violation? Date Non-Compliance? Action Due By: 07/18/2016 Routine/Periodic Yes 10/21/2016 iTM1620045047 **Tony Morales**

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 Date Violation? Inspection No. Non-Compliance? Action Due By: 07/18/2016 Routine/Periodic Tony Morales iTM1620048780 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. 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? Date Non-Compliance? Inspection No. Action Due By: 07/18/2016 Routine/Periodic **Tony Morales** Yes iTM1620044081 No 10/21/2016 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 Violation? Inspection No. Inspector Date Non-Compliance? Action Due By: 07/18/2016 Routine/Periodic Tony Morales Yes No iTM1620047121 10/21/2016 Violations Absent Well Identification Signs (Rule 103) General Housekeeping (Rule 114) OK. All Equipment and Location in Good Shape. PJ STAINING AROUND WELL HEAD Comments on Inspection: FRESH OIL LOCATION SIGN. NOT VISIBLE. **TOOMEY ALLEN No.017** O-28-18S-28E 30-015-24448-00-00 *Significant Inspection Corrective Violation? Inspection No. Date Type Inspection Inspector Non-Compliance? Action Due By: TM1620048494 07/18/2016 Routine/Periodic **Tony Morales** Yes 10/21/2016 No **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 Violation? Inspection No. Date Type Inspection Inspector Non-Compliance? Action Due By: 07/18/2016 Routine/Periodic Tony Morales iTM1620044639 Yes No 10/21/2016 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. FRESHOIL ON FLOWLINE LOCATION SIGN NOT VISIBLE. **TOOMEY ALLEN No.019** O-28-18S-28E 30-015-24771-00-00

IOOMEY ALLEN No.019

Inspection

Date Type Inspection

Inspector

O-28-18S-28E

Significant

*Significant

Corrective

Non-Compliance?

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

07/18/2016

Date

Type Inspection Routine/Periodic Inspector

Violation?

*Significant Non-Compliance?

Corrective **Action Due By:**

Inspection No.

Tony Morales

Yes No 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,

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.