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

29-Sep-16

HEYCO DEVELOPMENT CORPORATION

P.O. BOX 1933 ROSWELL NM 88202-

LETTER OF VIOLATION - Inactive Well(s)

Dear Operator:

A review of our records and recent inspection(s) indicate that the subject well(s) has been shut-in for an extended period of time. Rule 19.15.25.8 of the Rules and Regulation of the Oil Conservation Division provides that a well may be shut-in no longer than sixty days after suspension of drilling operations, upon determining that ther well is no longer usable (e.g., a dry hole), or one year after last production. To comply with guidelines as established in the Rules and Regulations, corrective actions must be taken immediately and the well(s) brought into compliance.

The detail section below indicates preliminary findings and/or probable nature of the violation.

The following options are available:

Comments on Inspection:

1. Immediately restore the well(s) to production, injection or disposal as applicable.

Idie Well (Rule 19.15.25.8)

- 2. Request Temporary Abandoned' status pursuant to Rule 19.15.25.13, which requires that you set a plug and conduct a mechanical integrity test.
- 3. Submit a proposal to 'Plug and Abandon' the well(s) pursuant to Rule 19.15.25.8, proceed with plugging procedures on a timely basis after the proposal has been evaluated, amended and/or approved.

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. Such a hearing may result in imposition of CIVIL PENALTIES for your violation of OCD rules.

IDLE WELL INSPECTION DETAIL SECTION Inspection No. iGC1627240776 **BENNETT RANCH UNIT 001Y** B-14-26S-12E 30-035-20028-00-00 **Inspection Date:** 9/28/2016 11:19:34 AM Corrective Action Due by: 1/1/2017 Type Inspection Violation? *Significant Non-Compliance? Inspector Yes Routine/Periodic Gilbert Cordero No Comments on Inspection: Idle Well (Rule 19.15.25.8) **BENNETT RANCH 25 UNIT 001** G-25-26S-12E 30-035-20031-00-00 Inspection No. iGC1627243636 Corrective Action Due by: 1/1/2017 **Inspection Date:** 9/28/2016 12:07:14 PM *Significant Non-Compliance? Type Inspection Inspector Violation? Gilbert Cordero Yes No Routine/Periodic

Thank you for your prompt attention to this matter and your efforts in helping to protect our environment and the infrastructure of the oil and gas industry.

Sincerely,

Gilbert Cordero

Compliance Officer

Artesia OCD District Office

* Significant Non-Compliance events are reported directly to the U.S. Environmental Protection Agency, Region VI, Dallas, Texas.