State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez Governor

Tony DelfinActing Cabinet Secretary

David R. Catanach, Division Director

Oil Conservation Division



Response Required - Deadline Enclosed

15-Dec-16

VANGUARD OPERATING, LLC 5847 SAN FELIPE, SUITE 3000 HOUSTON TX 77057-

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:

- 1. Immediately restore the well(s) to production, injection or disposal as applicable.
- 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 19.15.25.9, 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.

INTERMEDITATION DETAIL GEOTION

	IDLE WELL INSPE	CTION DETAIL SECT	ION	
MARGARET RQ STATE 00	1 K-36-4S-24E	30-005-61122-00-00	Inspection No. iGC1635037343	
Inspection Date: 12/15/2016 10:22:22 AM		Corrective Action Due by: 3/20/2017		
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic	Gilbert Corder	o Yes	No	
Comments on Inspection:	Violation of rule 19.15.25.8.	LAST REPORTED PRODUC	CTION 1-1-15.	
REDMAN OY STATE 003	O-26-4S-24E	30-005-61431-00-00	Inspection No. iGC1635035883	
Inspection Date: 12/15/20	16 9:58:02 AM	Correc	Corrective Action Due by: 3/20/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic	Gilbert Corder	o Yes	No	
Comments on Inspection:	Violation of rule 19.15.25.8.	LAST REPORTED PRODUC	CTION 5-1-15	
REDMAN OY STATE 004	N-35-4S-24E	30-005-61432-00-00	Inspection No. iGC1635036780	

Inspection Date: 12/15/2	2016 10:12:58 AM	Correc	tive Action Due by: 3/20/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic	Gilbert Corde	ero Yes	No	
Comments on Inspection:	Violation of rule 19.15.25.	8. LAST REPORTED PRODUC	CTION 3-1-14	
REDMAN OY STATE 005	F-35-4S-24E	30-005-61464-00-00	Inspection No. iGC1635036493	
Inspection Date: 12/15/2	2016 10:08:11 AM	Correct	tive Action Due by: 3/20/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic	Gilbert Corde	ero Yes	No	
Comments on Inspection:	Violation of rule 19.15.25.	8. LAST REPORTED PRODUC	CTION 10-1-15	
WILLOW CREEK BFI ST. 004	ATE G-31-4S-25E	30-005-62077-00-00	Inspection No. iGC1635042621	
Inspection Date: 12/15/2	2016 11:50:20 AM	Correc	Corrective Action Due by: 3/20/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic	Gilbert Corde	ero Yes	No	
Comments on Inspection:	Violation of rule 19.15.25.	8. LAST REPORTED PRODUC	CTION 12-1-14	
WILLOW CREEK BFI ST. 006	ATE C-30-4S-25E	30-005-63691-00-00	Inspection No. iGC1635039204	
Inspection Date: 12/15/2	2016 10:53:23 AM	Correc	Corrective Action Due by: 3/20/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic	Gilbert Corde	ero Yes	No	
Comments on Inspection:	Violation of rule 19.15.25.	8. LAST REPORTED PRODUC	CTION 6-1-15	
WILLOW CREEK BFI STATE 007	G-30-4S-25E	30-005-63692-00-00	Inspection No. iGC1635039080	
Inspection Date: 12/15/2	2016 10:51:18 AM	Correct	tive Action Due by: 3/20/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic	Gilbert Corde	ero Yes	No	
Comments on Inspection:	Violation of rule 19.15.25.	8. LAST REPORTED PRODUC	CTION 9 -1-15	
WILLOW CREEK BFI ST. 010	ATE I-30-4S-25E	30-005-64070-00-00	Inspection No. iGC1635038954	
Inspection Date: 12/15/2	2016 10:49:13 AM	Correc	tive Action Due by: 3/20/2017	
Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	
Routine/Periodic	Gilbert Corde	ero Yes	No	
Comments on Inspection:	Violation of rule 19.15.25.	8. LAST REPORTED PRODUC	CTION 5-1-15	

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.