

March 17, 2022

Melanie Barnes
Acting State Director
New Mexico Bureau of Land Management
301 Dinosaur Trail
Santa Fe, NM 87508

Re: Potential Violations of Federal Laws, Rules, and Policies Concerning Inactive Wells

Dear Acting State Director Barnes:

We are writing concerning the growing number of inactive wells on federal lands in New Mexico and whether owners and operators of those wells are complying with applicable legal requirements. These wells have profound implications for lands and waters throughout New Mexico, as well as the fish, wildlife, wilderness, and recreation values they support, and are detrimental to achieving the Biden Administration's climate goals, as inactive wells are a significant source of greenhouse gas emissions.

We are specifically concerned for two types of inactive wells: orphaned and "temporarily abandoned" wells. As explained below, there appears to be widespread noncompliance among parties that are responsible for these wells. Of added concern, many of these parties have continued to acquire federal oil and gas leases, which raises questions about whether those acquisitions violate section 17 of the Mineral Leasing Act (MLA). *See* 30 U.S.C. § 226(g) (prohibiting any party that "has failed or refused to comply in any material respect with the reclamation requirements and other standards" from obtaining federal oil and gas leases).

Accordingly, as soon as possible, we respectfully request that the New Mexico State Office undertake an audit to verify whether:

1. Any parties identified in this letter are, in fact, violating applicable legal requirements concerning inactive wells over which they have legal ownership or control;
2. Any other party that is suspected of violating applicable legal requirements concerning inactive wells over which they have legal ownership or control is, in fact, violating those requirements; and
3. Any party that is or may be violating applicable legal requirements concerning inactive wells over which they have legal ownership or control has acquired any leases – by purchase or assignment – since the onset of any violation(s).

We further request that BLM refrain from processing and/or authorizing any applications for permit to drill, rights-of-way, or other activities related to exploration and development of the leases identified in the Appendix unless and until BLM completes the audit and determines whether any or all of these leases should be cancelled. *See* 43 C.F.R. § 3108.3 ("Leases shall be subject to cancellation if improperly issued.").

I. INTRODUCTION

According to the New Mexico Oil Conservation Division (OCD), as of March 17, 2022, there were thousands of long-term inactive wells on federal lands in the state:¹

Period of Inactivity	# of Inactive Wells on Federal Lands
6+ months	3,504
1+ year	2,675
5+ years	641
15+ years	115

Some of these inactive wells are “orphaned,” while others are “temporarily abandoned.” Regardless of their status, the MLA requires the “complete and timely reclamation” of all lease tracts “after the abandonment or cessation of oil and gas operations on the lease.” 30 U.S.C. § 226(g). Operators must “promptly plug and abandon” all wells that are not producing or serving as injection or disposal wells, remove “drilling or producing equipment from the site,” and reclaim “the surface of the lands disturbed in connection with the conduct of operations. . .” 43 C.F.R. § 3162.3-4(a), (c). Operators may delay final reclamation by “temporarily abandoning” wells, but must first obtain approval from BLM – within thirty days and annually thereafter. *Id.* § 3162.3-4(c).

These duties are not the sole responsibility of lease operators. Under the MLA and BLM’s rules, lessees are “responsible for performing all obligations under the lease,” including the “responsibility to plug and abandon all wells which are no longer capable of producing, reclaim the lease site, and remedy all environmental problems. . .” 43 C.F.R. §§ 3106.7-2(a), 3106.7-6(a). IBLA and federal courts have consistently upheld this obligation. In *Realza del Spear*, IBLA ruled that,

[u]nder BLM’s regulations and Board precedent, the record title owner retains its obligations to satisfy, and bears ultimate responsibility for adherence to, lease terms, including the requirement to plug and abandon wells. The transfer of operating rights is simply a subsidiary arrangement between the leaseholder and the operator that does not affect the relationship imposed by the lease between the leaseholder and the United States.

190 IBLA 318, 319 (2017); *see also Monahan v. United States DOI*, No. 05-8068, 2007 U.S. App. LEXIS 24211, *9 (10th Cir. Oct. 15, 2017) (concurring with IBLA). Thus, lessees are liable for any inactive well violations that stem from acts or omissions of their operators.

Employing records from New Mexico OCD and BLM, we attempted to identify federal lease owners and operators that may be violating applicable legal requirements for “orphaned” and “temporarily abandoned” wells. We also attempted to identify whether any of those parties may have obtained federal oil and gas leases in violation of section 17 of the MLA. The results of our analysis are presented below.

¹ <https://wwwapps.emnrd.nm.gov/ocd/ocdpermitting/Reporting/Compliance/InactiveWells.aspx>

II. POTENTIAL VIOLATIONS INVOLVING “ORPHANED” WELLS

A. Overview

By definition, “orphaned” wells involve a party (or parties) that is unwilling or unable to comply with reclamation requirements. Under current BLM policy, an “orphaned well” has “no legally responsible or liable party to perform permanent well plugging, abandonment and reclamation. . . .” BLM Instruction Memorandum 2021-039. Thus, when a well is “orphaned,” a *per se* violation exists.

As of April 12, 2021, there were over 100 “orphaned” wells on federal lands in New Mexico.² Many of these wells are located on lease tracts whose owners have continued to acquire new leases. The following table summarizes lease acquisitions that occurred: (1) within the past five years;³ and (2) after the presumed orphaning of a well on a federal lease tract for which the companies identified below are listed as lessees of record.

COMPANY	LEASES PURCHASED	LEASES ACQUIRED BY ASSIGNMENT
Chevron	4 leases / 3,734 acres	14 leases / 5,367 acres
EOG	56 leases / 56,333 acres	71 leases / 65,123 acres
Marshall & Winston	3 leases / 2,816 acres	0
Occidental	9 leases / 1,654 acres	22 leases / 7,149 acres
XTO	5 leases / 1,560 acres	6 leases / 1,561 acres

² To the best of our knowledge, OCD has not publicly updated this list since April 12, 2021.

³ Technically, the period from 01/01/2017 to 01/01/2022.

B. Notable Examples

1. **API# 30-005-20588 / BLM Lease# NMNM 088748**
Operator of Record: Cano Petroleum of New Mexico
Lessee of Record: Occidental Petroleum
Location: Southeastern New Mexico (Chaves County)



Google Earth imagery dated June 2019

According to OCD, this well was spud in November 1977 and last produced in October 1988.⁴ In 2010, BLM notified Cano Petroleum that it had 60 days to resume production or the lease would terminate, neither of which occurred. In 2012, Cano Petroleum filed for bankruptcy,⁵ and OCD subsequently placed API# 30-005-20588 on its orphaned well list, along with dozens of other wells owned and/or operated by Cano Petroleum.

It appears that Occidental Petroleum (Oxy) – then doing business as Altura Energy – acquired NMNM 088748 in 1997.⁶ Since 2012, when Cano Petroleum filed for bankruptcy, Oxy has acquired scores of federal oil and gas leases in New Mexico, including nearly thirty over the past five years.

⁴ All information concerning this well was obtained from OCD's online file:

<https://wwwapps.emnrd.nm.gov/ocd/ocdpermitting/Data/WellDetails.aspx?api=30-005-20588>

⁵ <https://www.reuters.com/article/us-cano/cano-petroleum-units-file-for-bankruptcy-idUSBRE8270T520120308>

⁶ All information concerning this leases was obtained BLM's Legacy Rehost 2000:

<https://reports.blm.gov/xmlpserver/servlet/xdo?xdo=%2FLR2K+Public%2FBIP+Reports%2FPub+CR+SRP%2F2+New+Format+Serial+Entry%2FPub+CR+SRP+New+Format+Serial+Entry.xdo&fromLoadingPage=true&sTkn=136a5dbb17ec71d8b80&id=fe3363a8-4f32-44a7-a8e5-8f487f9ca092&dFlag=false>

2. **API# 30-005-20191 / BLM Lease# NMNM 0155494-A**
Operator of Record: Cano Petroleum of New Mexico
Lessee of Record: Marshall & Winston
Location: Southeastern New Mexico (Chaves County)



Google Earth imagery dated June 2019

According to OCD, this well was spud in December 1967 and last produced oil or gas in July 2011.⁷ In 2010, following “repeated request and strict direction of the Oil Conservation Division,” BLM ordered Cano Petroleum to undertake “corrective action” at this well site, including “[t]he removal of stained soil and/or asphaltenes surrounding wellhead and well pipe. . .”⁸ It is not clear if this corrective action was ever undertaken; however, according to a recent news story, there are currently “16,000 backlogged remediation cases [in New Mexico] running from the 2000s up to 2018. . .”⁹ As noted previously, Cano Petroleum filed for bankruptcy in 2012,¹⁰ and OCD subsequently placed API# 30-005-20191 on its orphaned well list.

It appears that Marshall & Winston first acquired an interest in NMNM 0155494-A in 1996.¹¹ Since 2012, when Cano Petroleum filed for bankruptcy, Marshall & Winston has acquired several federal oil and gas leases in New Mexico, including three over the past five years.

⁷ <https://wwwapps.emnrd.nm.gov/ocd/ocdpermitting/Data/WellDetails.aspx?api=30-005-20191>

⁸ https://ocdimage.emnrd.nm.gov/Imaging/FileStore/hobbs/wf/302028/30005201910000_36_wf.pdf

⁹ <https://capitalandmain.com/by-not-hiring-enough-staff-new-mexico-leaves-private-contract-money-on-the-table>

¹⁰ <https://www.reuters.com/article/us-cano/cano-petroleum-units-file-for-bankruptcy-idUSBRE8270T520120308>

¹¹

<https://reports.blm.gov/xmlpserver/servlet/xdo? xdo=%2FLR2K+Public%2FBIP+Reports%2FPub+CR+SRP%2F2+New+Format+Serial+Entry%2FPub+CR+SRP+New+Format+Serial+Entry.xdo&fromLoadingPage=true& sTkn=1612d93917ed5b688eb& id=06551498-f8cb-427c-8a1f-4d25a6fcc625& dFlag=false>

3. **API# 30-005-20557/ BLM Lease# NMNM 15016**
Operator of Record: Cano Petroleum of New Mexico
Lessee of Record: XTO Holdings
Location: Southeastern New Mexico (Chaves County)



Google Earth imagery dated June 2019

According to OCD, this well was spud in October 1976 and last produced in Nov. 2009.¹² As noted previously, Cano Petroleum filed for bankruptcy in 2012,¹³ and OCD subsequently placed API# 30-005-20557 on its orphaned well list.

XTO Holdings acquired NMNM 15016 in 2018, but its parent company, ExxonMobil, has owned an interest in this lease since at least 1973.¹⁴ Since 2012, when Cano Petroleum filed for bankruptcy, XTO and ExxonMobil have obtained several federal oil and gas leases in New Mexico, including at least ten over the past five years

III. POTENTIAL VIOLATIONS INVOLVING WELLS WITH EXPIRED “TEMPORARY ABANDONMENT” APPROVALS

A. Overview

While lease owners and operators may delay final reclamation for “temporarily abandoned” wells, they must obtain BLM’s approval at the outset and then annually. 43 C.F.R. § 3162.3-4(c). When these approvals expire and operators fail to promptly reclaim their lease tracts, they are violating reclamation requirements.

¹² <https://www.wapps.emnrd.nm.gov/ocd/ocdpermitting/Data/WellDetails.aspx?api=30-005-20557>

¹³ <https://www.reuters.com/article/us-cano/cano-petroleum-units-file-for-bankruptcy-idUSBRE8270T520120308>

¹⁴

<https://reports.blm.gov/xmlpserver/servlet/xdo? xdo=%2FLR2K+Public%2FBIP+Reports%2FPub+CR+SRP%2F2+New+Format+Serial+Entry%2FPub+CR+SRP+New+Format+Serial+Entry.xdo&fromLoadingPage=true& sTkn=fcd791b17ed6278f48& id=1f9fc3b4-26d5-4920-afd3-87c7620220e9& dFlag=false>

According to New Mexico OCD, as of March 17, 2022, there were 83 wells on federal lands with expired “temporary abandonment” authorizations.¹⁵ Many of these operators have continued to acquire leases, as have owners of the underlying leases. The following table summarizes acquisitions that occurred: (1) within the past five years;¹⁶ and (2) following the onset of potential violations related to wells with expired “temporary abandonment” authorizations:

COMPANY	LEASES PURCHASED	LEASES ACQUIRED BY ASSIGNMENT
COG	0	3 leases / 1,200 acres
Chevron	4 leases / 3,734 acres	14 leases / 5,367 acres
Devon Energy	2 leases / 120 acres	5 leases / 840 acres
EOG	56 leases / 56,333 acres	71 leases / 65,123 acres
Extex	0	6 leases / 4,920 acres
Marshall & Winston	3 leases / 2,816 acres	0
Occidental	9 leases / 1,654 acres	22 leases / 7,149 acres
XTO	7 leases / 1,800 acres	6 leases / 1,561 acres

¹⁵ This refers to “temporary abandonment” authorized by OCD. BLM does not share data on federal authorizations with the public, but it is available for some wells via OCD’s online files.

¹⁶ Technically, the period from 01/01/2017 to 01/01/2022.

B. Notable Examples

1. **API# 30-015-36306 / BLM Lease# NMNM 002747**
Operator of Record: Burnett Oil
Lessee of Record: EOG Resources (and others)
Location: Southeastern New Mexico (Eddy County)



Google Earth imagery dated Nov. 2017

According to OCD, the state and BLM's temporary abandonment authorizations for this well expired in Feb. 2017,¹⁷ and OCD's records do not show that this well has been plugged or the site reclaimed. Further, at some point, this well was converted into a water injection well, but there are no reported injections since 2014.

EOG, which has been one of the largest purchasers of federal oil and gas leases in New Mexico – if not the largest – for the past several years, acquired NMNM 002747 in 2000.¹⁸ Over the past five years, EOG has acquired well over one hundred new federal leases in New Mexico.

¹⁷ https://wwwapps.emnrd.nm.gov/ocd/ocdpermitting/Data/WellDetails.aspx?api=30-015-36306;https://ocdimage.emnrd.nm.gov/Imaging/FileStore/artesia/wf/304189/30015363060000_18_wf.pdf.

¹⁸

https://reports.blm.gov/xmlpserver/loading.jsp?_xdo=%2FLR2K+Public%2FBIP+Reports%2FPub+CR+SRP%2F2+New+Format+Serial+Entry%2FPub+CR+SRP+New+Format+Serial+Entry.xdo&_id=7cdbc092-335e-4a8d-89bf-9ce5afbc99d5&_sTkn=1664e4e017ed64c2272&_dFlag=false&_genstatus=

2. **API# 30-005-00891/ BLM Lease# NMNM 02509**
Operator of Record: Remnant Oil Operating
Lessee of Record: Chevron
Location: Southeastern New Mexico (Chaves County)



Google Earth imagery dated June 2019

According to OCD, the state's temporary abandonment authorization for this well expired in Feb. 2017,¹⁹ while BLM's expired in Jan. 2018.²⁰ In Sept. 2018, BLM rejected Remnant Oil's request to extend the abandonment period for another year because it failed to provide a "time frame w/ justification."²¹ At some point, this well was converted into a water injection well, but there are no reported injections since 2014.

It appears that Chevron acquired this lease in 2000 when it bought Texaco.²² Chevron remains one of the largest operators in the Permian Basin, and since early 2018, has acquired nearly twenty leases on federal lands in southeastern New Mexico.

¹⁹ <https://wwwapps.emnrd.nm.gov/ocd/ocdpermitting/Data/WellDetails.aspx?api=30-015-36306>

²⁰ https://ocdimage.emnrd.nm.gov/Imaging/FileStore/artesia/wf/315721/30005008910000_41_wf.pdf

²¹ *Id.*

²² <https://reports.blm.gov/report/LR2000/65/Pub-CR-Serial-Register-Page;>
[https://www.nytimes.com/2000/10/16/business/chevron-agrees-to-buy-texaco-for-stock-valued-at-36-billion.html.](https://www.nytimes.com/2000/10/16/business/chevron-agrees-to-buy-texaco-for-stock-valued-at-36-billion.html)

Operator of Record: BXP Operating

Location: Southeastern New Mexico (Lea County)



According to OCD, the state and BLM’s “temporary abandonment” authorizations for this well expired in Oct. 2018.²³ In Oct. 2018, a former operator – Pogo Oil and Gas Operating – applied to plug and abandon this well; BLM denied that application, however, because of questions about the well’s status and integrity.²⁴ This well has not produced since June 2008.

IV. POTENTIAL VIOLATIONS INVOLVING “TEMPORARILY ABANDONED” WELLS THAT LACK THE REQUISITE JUSTIFICATION

Operators must provide “detailed economic and engineering” information to support “temporarily abandonment” applications. “[V]ague assertions that the well might produce . . . are not enough to justify granting another 12-month delay.” *Goldmark Engineering, Inc.*, 146 IBLA 225, 227 (1998); *see also ERC Industries*, 124 IBLA 331, 334 (upholding BLM’s denial of a temporary abandonment

²³ https://wwwapps.emnrd.nm.gov/ocd/ocdpermitting/Data/WellDetails.aspx?api=30-025-29448;https://ocdimage.emnrd.nm.gov/Imaging/FileStore/hobbs/wf/314377/30025294480000_32_wf.pdf

25

https://reports.blm.gov/xmlpserver/servlet/xdo?_xdo=%2FLR2K+Public%2FBIP+Reports%2FPub+CR+SRP%2F2+New+Format+Serial+Entry%2FPub+CR+SRP+New+Format+Serial+Entry.xdo&fromLoadingPage=true&_stkn=1664e4e017ed64c2272&_id=58aba42a-c3a2-4103-94fb-6d1c8aeb8aea&_dFlag=false

application after the operator had repeatedly – over the course of several years – cited the need for “improved economics”). As IBLA has warned, “a risk of environmental harm persists” as operators “await improved economics and financial support. . . .” *Chaveroo Operating Co., Inc.*, 136 IBLA 102, 104 (1996).

Accordingly, operators must provide “adequate, detailed economic and engineering justification” to support “temporary abandonment” requests. *Stove Creek Oil Inc.*, 162 IBLA 97, 100 (2004). “Temporary abandonments” that are based on “vague assertions” about future plans or conditions and that lack “detailed economic and engineering justification” are invalid. In such cases, the operator lacks a legitimate basis for delaying final reclamation.

Based on records obtained through OCD’s online well files, we identified numerous instances where operators provided no justification whatsoever to support “temporary abandonment” requests or offered nothing more than “vague assertions” about future market conditions or development plans. These “temporary abandonment” authorizations, which BLM appears to be rubberstamping, do not comport with applicable rules, policies, and IBLA case law. Accordingly, lease owners and operators which have obtained these legally deficient authorizations are likely violating reclamation requirements. Many of these parties have continued to acquire leases. The following table summarizes acquisitions that occurred: (1) within the past five years;²⁶ and (2) following the onset of potential violations related to “temporary abandonments” that lack the requisite justification:

COMPANY	LEASES PURCHASED	LEASES ACQUIRED BY ASSIGNMENT
Devon Energy	0	4 leases / 600 acres
DJR	0	18 leases / 11,413 acres
Dugan Production Co.	0	21 leases / 18,225 acres
Hilcorp	0	13 leases / 16,004 acres
Legacy Reserves Operating Co.	1 lease / 240 acres	0
SG Interests	0	2 leases / 1,520 acres

²⁶ Technically, the period from 01/01/2017 to 01/01/2022.

B. Notable Examples

1. **API# 30-039-23264 / BLM Lease# NMSF 078640**
Operator of Record: Hilcorp Energy Co.
Lessee of Record: Hilcorp San Juan
Location: Northwestern New Mexico (Rio Arriba County)



Google Earth imagery dated Oct. 2016

According to OCD, this well was spud in Nov. 1983, last produced in Nov. 2009,²⁷ and has been temporarily abandoned since at least 2010.²⁸ Hilcorp and its predecessor operators have consistently offered-up vague assertions to support their “temporary abandonment” requests – e.g., “due to uneconomic production” (2010),²⁹ “to evaluate the well for further production” (2013),³⁰ “to evaluate the well for future use” (2017),³¹ and “to review for future potential” (2020)³² – all of which BLM has approved.

Hilcorp acquired NMSF 078640 in 2018.³³ Since that time, it has acquired several other leases on federal lands in northwestern New Mexico. Hilcorp is also the owner and operator of thousands of inactive wells in New Mexico, many of which have not produced oil or gas in years and may suffer from some of the same regulator infirmities as API# 30-039-23264.

²⁷ <https://wwwapps.emnrd.nm.gov/ocd/ocdpermitting/Data/WellDetails.aspx?api=30-039-23264>

²⁸ https://ocdimage.emnrd.nm.gov/Imaging/FileStore/aztec/wf/90336/3003923264_21_wf.pdf

²⁹ *Id.*

³⁰ https://ocdimage.emnrd.nm.gov/Imaging/FileStore/aztec/wf/250996/30039232640000_28_wf.pdf

³¹ https://ocdimage.emnrd.nm.gov/Imaging/FileStore/aztec/wf/310946/30039232640000_38_wf.pdf

³²

https://ocdimage.emnrd.nm.gov/Imaging/FileStore/aztec/wf/20200911/30039232640000_09_11_2020_09_51_51.pdf

³³

https://reports.blm.gov/xmlpserver/loading.jsp?_xdo=%2FLR2K+Public%2FBIP+Reports%2FPub+CR+SRP%2F2+New+Format+Serial+Entry%2FPub+CR+SRP+New+Format+Serial+Entry.xdo&_id=ccb9a506-e913-4e70-b8ad-f06a32141198&_sTkn=e3429d8617ed6863d59&_dFlag=false&_genstatus=

2. **API# 30-045-27101/ BLM Lease# NMNM 076857**
Operator of Record: DJR Operating
Lessee of Record: DRJ Nominee Corp. (and other)
Location: Northwestern New Mexico (San Juan County)



Google Earth imagery dated Apr. 2019

According to OCD, this well, which is located just outside of the Bisti/De-Na-Zin Wilderness Area, was spud in Nov. 1988, last produced in Sept. 2013,³⁴ and has been temporarily abandoned since at least Mar. 2014.³⁵ DJR and its predecessor operator have consistently failed to articulate any basis for abandoning the well – e.g., 2014,³⁶ 2017,³⁷ and 2019.³⁸

DJR acquired NMNM 076857 in 2017.³⁹ Since that time, DJR has acquired nearly twenty other federal leases in northwestern New Mexico.

³⁴ <https://wwwapps.emnrd.nm.gov/oed/oedpermitting/Data/WellDetails.aspx?api=30-045-27101>

³⁵ https://oedimage.emnrd.nm.gov/Imaging/FileStore/aztec/wf/255709/30045271010000_24_wf.pdf

³⁶ *Id.*

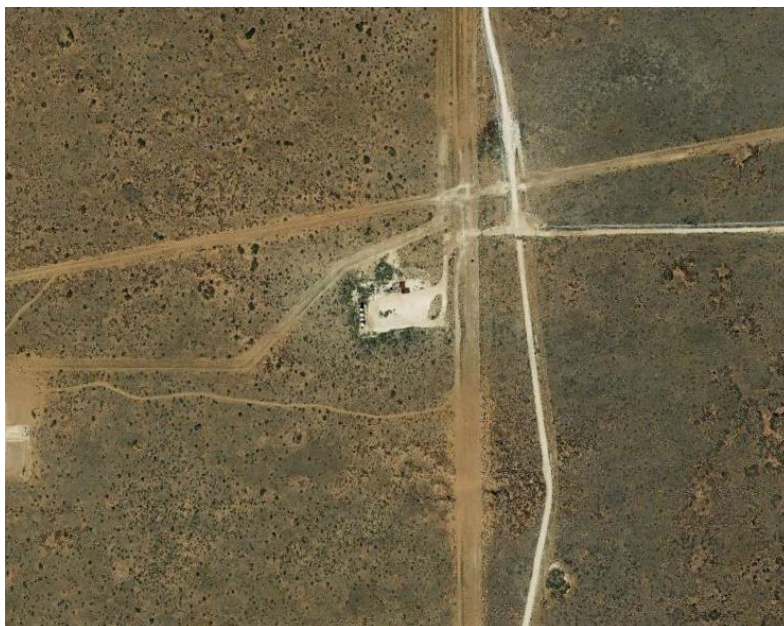
³⁷ https://oedimage.emnrd.nm.gov/Imaging/FileStore/aztec/wf/307670/30045271010000_28_wf.pdf

³⁸ https://oedimage.emnrd.nm.gov/Imaging/FileStore/aztec/wf/318621/30045271010000_08_27_2019_11_52_55_a.pdf

³⁹

https://reports.blm.gov/xmlpserver/loading.jsp?_xdo=%2FLR2K+Public%2FBIP+Reports%2FPub+CR+SRP%2F2+New+Format+Serial+Entry%2FPub+CR+SRP+New+Format+Serial+Entry.xdo&_id=b3004c5f-fefb-4456-8d62-384746c4a2cd&_sTkn=e3429d8617ed6863d59&_dFlag=false&_genstatus=

3. **API# 30-015-29551 / BLM Lease# NMNM 89055**
Operator of Record: Extex Operating Co.
Lessee of Record: Devon Energy & Legacy Reserves Operating
Location: Southeastern New Mexico (Eddy County)



Google Earth imagery dated Nov. 2017

According to OCD, this well was spud in May 2007 and last produced in Mar. 2016.⁴⁰ In 2017, Legacy Reserves, which previously operated this well, asked BLM for permission to temporarily abandon the well. BLM granted the request, but indicated that since the “well has not produced since 03/2016,” Liberty would need to “plug or produce by 08/24/2018.”⁴¹ Since that time and even though the well was not plugged or brought back on-line, BLM has granted at least two abandonment extension requests.⁴²

Devon acquired an interest in NMNM 89055 in 1997, and Legacy Reserves acquired an interest in 2015.⁴³ Over the past two-to-three years, Devon and Legacy have continued to acquire new federal leases in New Mexico.

V. CONFLICTS WITH OTHER USES AND VALUES ON FEDERAL LANDS IN NEW MEXICO

Many of the inactive wells and leases identified in this letter and Appendix are threats to the health and well-being of New Mexico’s public lands, waters, fish and wildlife, and communities. First, inactive wells are major sources of greenhouse gas emissions, including methane. According to one estimate, each inactive well “emits around 0.13 metric tons of methane per year. . . Since methane is

⁴⁰ <https://wwwapps.emnrd.nm.gov/ocd/ocdpermitting/Data/WellDetails.aspx?api=30-015-29551>

⁴¹ https://ocdimage.emnrd.nm.gov/Imaging/FileStore/artesia/wf/310725/30015295510000_31_wf.pdf

⁴² https://ocdimage.emnrd.nm.gov/Imaging/FileStore/artesia/wf/316692/30015295510000_35_wf.pdf;

https://ocdimage.emnrd.nm.gov/Imaging/FileStore/artesia/wf/321185/30015295510000_40_wf.pdf.

⁴³

<https://reports.blm.gov/xmlpserver/servlet/xdo? xdo=%2FLR2K+Public%2FBIP+Reports%2FPub+CR+SRP%2F2+New+Format+Serial+Entry%2FPub+CR+SRP+New+Format+Serial+Entry.xdo&fromLoadingPage=true& sTkn=c86227417eea41591d& id=87772d60-94b5-4049-93de-de86e4c99496& dFlag=false>

a more potent greenhouse gas than carbon dioxide, this 0.13 metric tons of methane has the warming equivalent of 11 tons of CO₂ using a 20-year GWP, or 4 tons of CO₂ using a 100-year GWP.”⁴⁴ These impacts will only increase the longer these wells are unplugged and not reclaimed, as required by federal law.

Second, dozens of inactive wells identified in this letter are located in sensitive big game habitats and conservation areas. In fact, there are more than 120 inactive wells, including sixty-eight orphaned wells, within big game habitats identified as priorities for management and protection by the State of New Mexico. The existence of these unreclaimed wells is a detriment to the state’s efforts to reduce habitat fragmentation in these sensitive areas.

Finally, over thirty of the leases identified in this letter, all of which may have been issued or assigned in violation of 30 U.S.C. Section 226(g), are located in sensitive wilderness, wildlife, or conservation areas. For example, there over 14,000 acres of potentially illegal leases that overlap with lands that harbor wilderness values. There are also more than 63,000 acres of potentially illegal leases within big game priority areas and nearly 3,000 acres of potentially illegal leases within “areas of critical environmental concern.” BLM must thoroughly examine each of these leases to determine whether they were unlawfully issued and should be cancelled.

VI. CONCLUSION

Please let me know if you have any questions or concerns regarding the findings and information presented in this letter. I would be more than happy to discuss them with you.

Sincerely,

Mark Allison
New Mexico Wild

⁴⁴ Resources for the Future, Plugging Abandoned Wells: Effects of the Draft Energy Infrastructure Act 1 (July 2021), available at https://media.rff.org/documents/IB_21-06_v3.pdf.

APPENDIX

Orphaned Wells

Well API#	Operator	Federal Lease #	Lessee(s)	Est. Violation Start Date	Federal Leases Acquired After Est. Violation Start Date
30-015-04788	Canyon E&P Company	NMNM 081381A	Chevron USA, Joseph O'Neill, Jr.	June 14, 2018 – Certificate of business license revocation issued to operator by N.M. Sec. of State	Chevron leases only: NMNM 121472 NMNM 126489 NMNM 126490 NMNM 132074 NMNM 134866 NMNM 114970 NMNM 104684 NMNM 138826 NMNM 138827 NMNM 113418 NMNM 129262 NMNM 123518 NMNM 124661 NMNM 141002 NMNM 138826 NMNM 138827 NMNM 138828 NMNM 136219
30-015-04839	Canyon E&P Company	NMNM 026418	Chevron USA	June 14, 2018 – Certificate of business license revocation issued to operator by N.M. Sec. of State	See leases listed for API# 30-015-04788
30-015-27560	Canyon E&P Company	NMNM 081381A	Chevron USA, Joseph O'Neill, Jr.	June 14, 2018 – Certificate of business license revocation issued to operator by N.M. Sec. of State	See leases listed for API# 30-015-04788 (Chevron only)
30-015-25943	Canyon E&P Company	NMNM 026418	Chevron USA	June 14, 2018 – Certificate of business license revocation issued to operator by N.M. Sec. of State	See leases listed for API# 30-015-04788
30-025-02449	Chestnut Exploration & Production Inc.	NMLC 061144	XTO	Nov. 29, 2017 – Operator filed for bankruptcy	NMNM 138834 NMNM 138849 NMNM 139846 NMNM 141412

					NMNM 137454 NMNM 115416 NMNM 119755 NMNM 119756 NMNM 120362 NMNM 136218 NMNM 137454
30-015-23604	Flare Oil Inc.	NMNM 6026	EOG Resources, CXY Energy	June 18, 2003 – Certificate of business license revocation issued to operator by N.M. Sec. of State	EOG leases only: NMNM136224 NMNM 138799 NMNM 138800 NMNM 138805 NMNM 138807 NMNM 138809 NMNM 138810 NMNM 138811 NMNM 139318 NMNM 139319 NMNM 139321 NMNM 139322 NMNM 139325 NMNM 139326 NMNM 139328 NMNM 139376 NMNM 139377 NMNM 139378 NMNM 139379 NMNM 139380 NMNM 139381 NMNM 139382 NMNM 139383 NMNM 139384 NMNM 139385 NMNM 139386 NMNM 139387 NMNM 139388 NMNM 139389 NMNM 139390 NMNM 139391 NMNM 139392 NMNM 139396 NMNM 139397 NMNM 139398 NMNM 139399 NMNM 139400 NMNM 139401 NMNM 139402 NMNM 139403 NMNM 139404 NMNM 139405 NMNM 139406 NMNM 139407 NMNM 139408

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					NMNM 110838
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					NMNM 112935
					NMNM 113930
					NMNM 115425
					NMNM 119276
					NMNM 122619
					NMNM 126493
					NMNM 131587
					NMNM 132943
					NMNM 135251
					NMNM 136224
					NMNM 138799
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30-025-27359	Flare Oil Inc.	NMNM 13647	Occidental Permian	June 18, 2003 – Certificate of business license revocation issued to operator by N.M. Sec. of State	NMNM 139369 NMNM 139847 NMNM 136214 NMNM 137444 NMNM 137455 NMNM 137458 NMNM 137803 NMNM 138847 NMNM 138872 NMNM 136214 NMNM 118712 NMNM 120897 NMNM 117120 NMNM 117120 NMNM 137455 NMNM 138847 NMNM 138872 NMNM 130863 NMNM 134864 NMNM 117551 NMNM 119273 NMNM 139369 NMNM 137458 NMNM 137803 NMNM 139847 NMNM 137444 NMNM 135240

					NMNM 104619 NMNM 108476 NMNM 108968
30-005-20588	Cano Petro of New Mexico, Inc.	NMNM 088748	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20610	Cano Petro of New Mexico, Inc.	NMNM088748	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20013	Cano Petro of New Mexico, Inc.	NMNM 0403706	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-10473	Cano Petro of New Mexico, Inc.	NMNM 0403706	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-10483	Cano Petro of New Mexico, Inc.	NMNM 0403706	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20095	Cano Petro of New Mexico, Inc.	NMNM 0354427-A	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20038	Cano Petro of New Mexico, Inc.	NMNM 0354427-A	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-10525	Cano Petro of New Mexico, Inc.	NMNM 0177517	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20056	Cano Petro of New Mexico, Inc.	NMNM 0177517	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20008	Cano Petro of New Mexico, Inc.	NMNM 0177517	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20015	Cano Petro of New Mexico, Inc.	NMNM 0177517	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20115	Cano Petro of New Mexico, Inc.	NMNM 0177517	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20016	Cano Petro of New Mexico, Inc.	NMNM 0444628	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20211	Cano Petro of New Mexico, Inc.	NMNM 0444628	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20292	Cano Petro of New Mexico, Inc.	NMNM 0444628	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20081	Cano Petro of New Mexico, Inc.	NMNM 0444628	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359

30-005-20031	Cano Petro of New Mexico, Inc.	NMNM 0177517	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20094	Cano Petro of New Mexico, Inc.	NMNM 0177517	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20137	Cano Petro of New Mexico, Inc.	NMNM 0177517	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20146	Cano Petro of New Mexico, Inc.	NMNM 0354427-A	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20045	Cano Petro of New Mexico, Inc.	NMNM 0177517	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20116	Cano Petro of New Mexico, Inc.	NMNM 0177517	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20058	Cano Petro of New Mexico, Inc.	NMNM 0354427	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20297	Cano Petro of New Mexico, Inc.	NMNM 0354427-A	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20129	Cano Petro of New Mexico, Inc.	NMNM 0354427-A	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20125	Cano Petro of New Mexico, Inc.	NMNM 0177517	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20096	Cano Petro of New Mexico, Inc.	NMNM 0177517	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20191	Cano Petro of New Mexico, Inc.	NMNM 0155494-A	Marshall & Winston Inc.	Mar. 7, 2012 – Operator filed for bankruptcy	NMNM 139352 NMNM 140714 NMNM 141413 NMNM 128835
30-005-20192	Cano Petro of New Mexico, Inc.	NMNM 0155494-A	Marshall & Winston Inc.	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-005-20191
30-005-20193	Cano Petro of New Mexico, Inc.	NMNM 0155494-A	Marshall & Winston Inc.	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-005-20191
30-005-20167	Cano Petro of New Mexico, Inc.	NMNM 0155494-A	Marshall & Winston Inc.	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-005-20191
30-005-20172	Cano Petro of New Mexico, Inc.	NMNM 0155494-A	Marshall & Winston Inc.	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-005-20191
30-005-20151	Cano Petro of New Mexico, Inc.	NMNM 0155494-A	Marshall & Winston Inc.	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-005-20191

30-005-20150	Cano Petro of New Mexico, Inc.	NMNM 0155494-A	Marshall & Winston Inc.	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-005-20191
30-005-20139	Cano Petro of New Mexico, Inc.	NMNM 0155494-A	Marshall & Winston Inc.	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-005-20191
30-005-20140	Cano Petro of New Mexico, Inc.	NMNM 0155494-A	Marshall & Winston Inc.	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-005-20191
30-005-20188	Cano Petro of New Mexico, Inc.	NMNM 0155494-A	Marshall & Winston Inc.	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-005-20191
30-005-20189	Cano Petro of New Mexico, Inc.	NMNM 0155494-A	Marshall & Winston Inc.	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-005-20191
30-005-29123	Cano Petro of New Mexico, Inc.	NMNM 0177517	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-29124	Cano Petro of New Mexico, Inc.	NMNM 0177517	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-29125	Cano Petro of New Mexico, Inc.	NMNM 0444628	Occidental Permian	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-29126	Cano Petro of New Mexico, Inc.	NMNM 85897	Cano Petroleum of NM, Oxy Y-1 Co.	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-025-27359
30-005-20557	Cano Petro of New Mexico, Inc.	NMNM 15016	XTO Holdings	Mar. 7, 2012 – Operator filed for bankruptcy	NMNM 138834 NMNM 138849 NMNM 139846 NMNM 141412 NMNM 136218 NMNM 136220 NMNM 137454 NMNM 115416 NMNM 119755 NMNM 119756 NMNM 120362 NMNM 136218
30-005-20584	Cano Petro of New Mexico, Inc.	NMNM 15016	XTO Holdings	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-005-20557
30-005-20585	Cano Petro of New Mexico, Inc.	NMNM 15016	XTO Holdings	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-005-20557
30-005-20611	Cano Petro of New Mexico, Inc.	NMNM 15016	XTO Holdings	Mar. 7, 2012 – Operator filed for bankruptcy	See leases listed for API # 30-005-20557

Wells with Expired “Temporary Abandonment” Approvals

Well API#	Operator	Federal Lease #	Lessee(s)	Est. Violation Start Date	Federal Leases Acquired After Est. Violation Start Date
30-041-10148	EOR Operating Co.	NMLC 060978	XTO Holdings	Likely prior to Jan. 1, 2017 – well last produced in 2000 and OCD's TA authorization expired in June 1994	NMNM 138834 NMNM 138849 NMNM 139846 NMNM 141412 NMNM 136218 NMNM 136220 NMNM 137454 NMNM 115416 NMNM 119755 NMNM 119756 NMNM 120362 NMNM 136218
30-041-10059	EOR Operating Co.	NMLC 060978	XTO Holdings	June 2, 2010 – date of BLM's TA expiration	See leases listed for API # 30-041-10148
30-025-29448	BXP Operating, LLC	NMLC 055546	Rosley Corp., Devon Energy, Kerr-McGee OG Onshore	Mar. 21, 2019 – date of BLM's TA expiration	Devon Energy leases only: NMNM 139370 NMNM 139371 NMNM 105213 NMNM 121955 NMNM 136216 NMNM 139370 NMNM 139371
30-005-00891	Remnant Oil Operating Co.	NMNM 02509	Chevron USA	Jan. 12, 2018 – date of BLM's TA expiration	NMNM 121472 NMNM 126489 NMNM 126490 NMNM 132074 NMNM 134866 NMNM 114970 NMNM 104684 NMNM 138826 NMNM 138827 NMNM 113418 NMNM 129262 NMNM 123518 NMNM 124661 NMNM 141002 NMNM 138826 NMNM 138827 NMNM 138828 NMNM 136219
30-015-36306	Burnett Oil Co.	NMNM 2747	EOG Resources, Anne Windfohr, Anne B. Tandy Est., Anne P. Phillips Trust, Oxy	Feb. 22, 2017 – date of BLM's TA expiration	NMNM136224 NMNM 138799 NMNM 138800 NMNM 138805 NMNM 138807

			Y-1 Co., Burnett L. Ollie Trust		NMNM 138809 NMNM 138810 NMNM 138811 NMNM 139318 NMNM 139319 NMNM 139321 NMNM 139322 NMNM 139325 NMNM 139326 NMNM 139328 NMNM 139376 NMNM 139377 NMNM 139378 NMNM 139379 NMNM 139380 NMNM 139381 NMNM 139382 NMNM 139383 NMNM 139384 NMNM 139385 NMNM 139386 NMNM 139387 NMNM 139388 NMNM 139389 NMNM 139390 NMNM 139391 NMNM 139392 NMNM 139396 NMNM 139397 NMNM 139398 NMNM 139399 NMNM 139400 NMNM 139401 NMNM 139402 NMNM 139403 NMNM 139404 NMNM 139405 NMNM 139406 NMNM 139407 NMNM 139408 NMNM 141012 NMNM 141013 NMNM 141014 NMNM 141015 NMNM 141364 NMNM 141365 NMNM 141366 NMNM 141367 NMNM 141368 NMNM 141370 NMNM 141527 NMNM 108454 NMNM 108971 NMNM 110838 NMNM 112917
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30-025-33381	BXP Operating, LLC	NMNM 09015	Chevron USA Inc.	Aug. 6, 2008 – date of BLM’s TA expiration	See leases listed for API # 30-005-00891
30-025-35238	Chevron USA	NMLC 057509	Chevron USA Holdings	Sept. 26, 2020 – date of BLM’s TA expiration	NMNM 121472 NMNM 126489 NMNM 126490 NMNM 132074 NMNM 134866 NMNM 141002

30-041-20756	EOR Operating Co.	NMNM 0145685	Occidental Permian LP	Likely prior to Jan. 1, 2017 – well last produced in 2009 and OCD's TA authorization expired in July 2004	See Oxy leases listed for API # 30-015-36306
30-015-34422	Extex Operating Company	NMNM 108958	Extex Operating	Nov. 1, 2019 – date of OCD's TA expiration (date of BLM's TA expiration unknown)	NMNM 108478 NMNM 108954 NMNM 108958 NMNM 108963 NMNM 109412 NMNM 114361
30-015-31651	Fasken Oil & Ranch Ltd.	NMLC 072015C	COG Operating LLC	Apr. 25, 2020 – date of BLM's TA expiration	NMNM 126491 NMNM 108476 NMNM 108968
30-005-00886	Remnant Oil Operating Co.	NM-03844	Marshall & Winston	Sept. 16, 2014 – date of BLM's TA expiration	NMNM 139352 NMNM 140714 NMNM 141413 NMNM 128835
30-005-00897	Remnant Oil Operating Co.	NMNM 003927	Oxy USA	Feb. 17, 2018 – date of BLM's TA expiration	NMNM 120897 NMNM 117120 NMNM 117120 NMNM 137455 NMNM 138847 NMNM 138872 NMNM 130863 NMNM 134864 NMNM 117551 NMNM 119273 NMNM 139369 NMNM 137458 NMNM 137803 NMNM 139847 NMNM 137444 NMNM 135240 NMNM 104619 NMNM 108476 NMNM 108968 NMNM 137444 NMNM 137455 NMNM 137458 NMNM 137803 NMNM 138847 NMNM 138872 NMNM 139369 NMNM 139847

Potential Violations Involving “Temporarily Abandoned” Wells That Lack the Requisite Justification

Well API#	Operator	Federal Lease #	Lessee(s)	Est. Violation Start Date	Federal Leases Acquired After Est. Violation Start Date
30-045-30864	Hilcorp Energy Co.	NMSF080117	Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2012	NMNM 111921 NMNM 112962 NMNM 114379 NMNM 114381 NMNM 114382 NMNM 114383 NMNM 114384 NMNM 114385 NMNM 117147 NMNM 117579 NMNM 120385 NMNM 120923
30-015-29551	Extex Operating Company	NMNM 89055	Legacy Reserves Operating & Devon Energy	Aug. 24, 2017 – date operators began providing similarly vague justifications	Legacy lease: NMNM 142570 Devon leases: NMNM 139370 NMNM 139371 NMNM 105213 NMNM 121955 NMNM 136216 NMNM 139370 NMNM 139371
30-039-20972	Hilcorp Energy Co.	NMSF078640	Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2012	See leases listed for API # 30-045-30864
30-039-21807	Hilcorp Energy Co.	NMSF078999	Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2014	See leases listed for API # 30-045-30864
30-039-23264	Hilcorp Energy Co.	NMSF 078875	Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2013	See leases listed for API # 30-045-30864

30-039-23575	Hilcorp Energy Co.	NMSF078922	Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2014	See leases listed for API # 30-045-30864
30-039-23859	Hilcorp Energy Co.	NMSF078913	Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2014	See leases listed for API # 30-045-30864
30-039-24867	Hilcorp Energy Co.	NMSF078741	Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2014	See leases listed for API # 30-045-30864
30-039-25379	Hilcorp Energy Co.	NMSF078882	Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2012	See leases listed for API # 30-045-30864
30-039-25965	Hilcorp Energy Co.	NMSF078048	Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2014	See leases listed for API # 30-045-30864
30-039-27305	Hilcorp Energy Co.	NMSF079383	McElvain Energy, Hilcorp San Juan, J & M Raymond Ltd.	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2012	Hilcorp only – see leases listed for API # 30-045-30864

30-039-29411	Hilcorp Energy Co.	NMSF079382	McElvain Energy, Hilcorp San Juan, J & M Raymond Ltd., TH McElvain, Jr.	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2012	Hilcorp only – see leases listed for API # 30-045-30864
30-039-29962	Hilcorp Energy Co.	NMSF078884	Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2015	See leases listed for API # 30-045-30864
30-039-30439	Hilcorp Energy Co.	NMSF078884	Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2015	See leases listed for API # 30-045-30864
30-043-21049	SG Interests I	NMNM 99737	SG Interests VII & Catamount Investments	Mar. 1, 2019 – operator provided no justification to support TA application	SG Interests leases only: NMNM 109381 NMNM 109382
30-045-05774	Hilcorp Energy Co.	NMSF078433	Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2012	See leases listed for API # 30-045-30864
30-045-22422	Hilcorp Energy Co.	NMSF 078387A	Simcoe LLC & Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2012	Hilcorp only – see leases listed for API # 30-045-30864
30-045-24299	Hilcorp Energy Co.	NMNM02874A	Hilcorp San Juan & Cross Timbers Energy	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2013	Hilcorp only – see leases listed for API # 30-045-30864

30-045-26141	Hilcorp Energy Co.	NMSF077922	Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2015	
30-045-26278	Hilcorp Energy Co.	NMSF 078267A	Hilcorp San Juan & Cross Timbers Energy	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2013	Hilcorp only – see leases listed for API # 30-045-30864
30-045-27101	DJR Operating	NMNM76857	DJR Nominee Corp. & Key Prod. Co.	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2014	DJR leases only: NMNM 117570 NMNM 118127 NMNM 118128 NMNM 118130 NMNM 118132 NMNM 118133 NMNM 118136 NMNM 120374 NMNM 120375 NMNM 121494 NMNM 121495 NMNM 121963 NMNM 122637 NMNM 127899 NMNM 128372 NMNM 128838 NMNM 130878 NMNM 136038
30-045-30184	Hilcorp Energy Co.	NMSF 078092	Hilcorp San Juan & Cross Timbers Energy	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2012	Hilcorp only – see leases listed for API # 30-045-30864
30-045-30252	Hilcorp Energy Co.	NMSF078390A	Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2014	See leases listed for API # 30-045-30864

30-045-30334	Hilcorp Energy Co.	NMNM0546	Simcoe LLC & Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2012	Hilcorp only – see leases listed for API # 30-045-30864
30-045-30336	Hilcorp Energy Co.	NMNM0546	Hilcorp San Juan & Simcoe LLC	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2014	Hilcorp only – see leases listed for API # 30-045-30864
30-045-30468	Hilcorp Energy Co.	NMSF 077317	Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2012	See leases listed for API # 30-045-30864
30-045-31042	DJR Operating	NMNM76867	DJR Nominee Corp. & Key Prod. Co.	Apr. 11, 2019 – operator provided no justification to support TA application	See leases listed for API # 30-045-27101
30-045-31793	Hilcorp Energy Co.	NMSF081239	Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2013	See leases listed for API # 30-045-30864
30-045-32833	Hilcorp Energy Co.	NMSF081239	Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2012	See leases listed for API # 30-045-30864
30-045-32890	Hilcorp Energy Co.	NMNM-024158	Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2012	See leases listed for API # 30-045-30864

30-045-32903	Hilcorp Energy Co.	NMNM 6890	Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2012	See leases listed for API # 30-045-30864
30-045-32929	Hilcorp Energy Co.	NMNM024158	Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2013	See leases listed for API # 30-045-30864
30-045-33734	Dugan Production Co.	NMNM10757	Dugan Prod. Co.	July 17, 2018 – operator provided no justification to support TA application	NMNM 104606 NMNM 104607 NMNM 104608 NMNM 104609 NMNM 109403 NMNM 109404 NMNM 109405 NMNM 109406 NMNM 109407 NMNM 112955 NMNM 112957 NMNM 112958 NMNM 112959 NMNM 114376 NMNM 114377 NMNM 117578 NMNM 118138 NMNM 120380 NMNM 120381 NMNM 127899 NMNM 130878
30-045-33993	Hilcorp Energy Co.	NMSF078212	Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2012	See leases listed for API # 30-045-30864
30-045-34051	Hilcorp Energy Co.	NMNM 0546	Simcoe LLC & Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2012	Hilcorp only – see leases listed for API # 30-045-30864

30-045-34073	Hilcorp Energy Co.	NMNM0546	Simcoe LLC & Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2012	Hilcorp only – see leases listed for API # 30-045-30864
30-045-34086	Hilcorp Energy Co.	NMNM0546	Simcoe LLC & Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2012	Hilcorp only – see leases listed for API # 30-045-30864
30-045-34134	Dugan Production Co.	NMNM 112955	Dugan Production Co.	Nov. 6, 2020 – operator provided no justification to support TA application	NMNM 104606 NMNM 104607 NMNM 104608 NMNM 104609 NMNM 109403 NMNM 109404 NMNM 109405 NMNM 109406 NMNM 109407 NMNM 112955 NMNM 112957 NMNM 112958 NMNM 112959 NMNM 114376 NMNM 114377 NMNM 117578 NMNM 118138 NMNM 120380 NMNM 120381
30-045-34141	Hilcorp Energy Co.	NMNM0546	Simcoe LLC & Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2012	Hilcorp only – see leases listed for API # 30-045-30864
30-045-34835	Hilcorp Energy Co.	NMNM03717B	Hilcorp San Juan	Likely prior to Jan. 1, 2017 – operators have been providing similarly vague TA justifications since at least 2012	See leases listed for API # 30-045-30864