



MICHELLE LUJAN GRISHAM  
GOVERNOR

JAMES C. KENNEY  
CABINET SECRETARY

**SENT BY ELECTRONIC MAIL AND CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

5/6/2026

Casey Snow  
Matador Production Company  
One Lincoln Centre  
5400 LBJ Freeway  
Dallas, TX 75240  
Sent by electronic mail to: CSnow@matadorresources.com

**Notice of Violation for Matador Production Company, EPCEB Air Case No. MAT-Multi-2501**

Dear Casey Snow,

The New Mexico Environment Department ("NMED") has identified Matador Production Company ("Matador") as having violated state and federal regulations for air quality. This Notice of Violation (NOV) is regarding the seven facilities ("Facilities") owned by Matador. The location and identifying information for the Facilities can be found in Attachment A.

Pursuant to the NMED Delegation Order dated June 23, 2025, the Cabinet Secretary ("Secretary") has delegated to the Environmental Protection Compliance and Enforcement Bureau ("EPCEB") Chief the authority to seek administrative enforcement for alleged violations of the United States Clean Air Act ("CAA"), the New Mexico Air Quality Control Act ("AQCA"), federal and state regulations, and the air quality permits issued thereunder. EPCEB is the Bureau within NMED responsible for compliance with and enforcement of air quality regulations.

This NOV is issued pursuant to NMSA 1978, Section 74-2-5.1(A), which states that NMED's "investigations shall be reduced to writing if any enforcement action is contemplated, and a copy shall be furnished to the owner or occupants of the premises before the action is filed."

**Alleged Violations**

On September 10, 2025, a compliance reports specialist completed a review of Excess Emissions Reports ("EERs") submitted by Matador for the seven facilities listed in Attachment A. Matador submitted the EERs through the Air Quality Bureau Compliance Reporting app (AQBCR). The investigation found evidence of the following violations:

1. **Failure to meet permitted allowable emission limits for regulated pollutants, pursuant to General Construction Permit for Oil and Gas (GCP-O&G) 10421, Specific Conditions A106, A107, and Table 2-I of the approved Registration Forms (12/23/2024).** Between April 24, 2025 and May 5, 2025, Matador submitted two (2) Final EERs for events at the Cedar Fed TB (AI# 12702) that started on

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March 20, 2024 and April 22, 2025. Together, these Final EERs reported the following excess emissions:

Pollutant	CO	NO <sub>x</sub>	PM	SO <sub>2</sub>	VOC	H <sub>2</sub> S
Excess (lbs)	11,762.61	2,581.08	2.31	47.18	9,232.18	0.51

Pollutant	Total HAPs	Formaldehyde	Acetaldehyde	Acrolein	Benzene
Excess (lbs)	446	2.44	0.33	0.31	0.19

Pollutant	Ethylbenzene	Toluene	Xylenes
Excess (lbs)	0.003	0.07	0.02

Matador submitted two (2) Affirmative Defense Demonstrations (ADDs) for the two events. The ADDs did not meet acceptability criteria and were denied.

2. **Failure to meet permitted allowable emission limits for regulated pollutants, pursuant to GCP-O&G number 6771-M11, Specific Conditions A106 and A107.** On April 2, 2025, Matador submitted one (1) Final EER for an event at the Tiger 14 Facility (AI # 36618) that started on October 18, 2024. This Final EER reported 7,403.03 pounds of excess carbon monoxide (CO), 1,623.89 pounds of excess nitrogen oxides (NO<sub>x</sub>), and 5,473.98 pounds of excess volatile organic compounds (VOC). Matador submitted an ADD for the event. The ADD did not meet acceptability criteria and was denied.
3. **Failure to meet permitted allowable emission limits for regulated pollutants, pursuant to GCP-O&G number 7929-M9, Specific Conditions A106 and A107.** On March 27, 2025, Matador submitted one (1) Final EER for an event at the Janie Conner Facility (AI# 38395) that started on November 2, 2024. This Final EER reported 7,285.07 pounds of excess CO, 3,649.14 pounds of excess NO<sub>x</sub>, and 5,900.96 pounds of excess VOCs. Matador submitted an ADD for the event. The ADD did not meet acceptability criteria and was denied.
4. **Failure to meet permitted allowable emission limits for regulated pollutants, pursuant to GCP-O&G number 8297-M4, Specific Conditions A106 and A107.** On February 14, 2025, Matador submitted one (1) Final EER for an event at the Biggers Fed West TB (AI# 38954) that started on December 30, 2024. This Final EER reported 15,875.26 pounds of excess CO, 3,482.31 pounds of excess NO<sub>x</sub>, 73.01 pounds of excess SO<sub>2</sub>, and 9,452.91 pounds of excess VOCs. Matador submitted an ADD for the event. The ADD did not meet acceptability criteria and was denied.
5. **Failure to meet permitted allowable emission limits for regulated pollutants, pursuant to GCP-O&G number 8718-M3, Specific Conditions A106 and A107.** On February 14, 2025, Matador submitted one (1) Final EER for an event at the Biggers Fed East TB (AI# 39433) that started on December 1, 2024. This Final EER reported 11,621.27 pounds of excess CO, 2,549.18 pounds of excess NO<sub>x</sub>, 114.41 pounds of excess SO<sub>2</sub>, and 5,519.22 pounds of excess VOCs. Matador submitted an ADD for the event. The ADD did not meet acceptability criteria and was denied.
6. **Failure to meet permitted allowable emission limits for regulated pollutants, pursuant to GCP-O&G number 8839-M4, Specific Conditions A106 and A107.** On March 27, 2025, Matador submitted one

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(1) Final EER for an event at the Boros West Facility (AI# 39564) that started on June 6, 2024. The Final EER reported 16,581.94 pounds of excess CO, 3,637.33 pounds of excess NO<sub>x</sub>, and 10,587.72 pounds of excess VOCs. Matador submitted an ADD for the event. The ADD did not meet acceptability criteria and was denied.

7. **Failure to meet permitted allowable emission limits for regulated pollutants, pursuant to GCP-O&G number 9628-M2, Specific Conditions A106 and A107.** On March 27, 2025, Matador submitted one (1) Final EER for an event at the Dee Osborne TB (AI# 40485) that started on June 11, 2024. The Final EER reported 22,982.50 pounds of excess CO, 5,041.32 pounds of excess NO<sub>x</sub>, 2,888.36 pounds of excess SO<sub>2</sub>, and 20,349.56 pounds of excess VOCs. Matador submitted an ADD for the event. The ADD did not meet acceptability criteria and was denied.
8. **Failure to submit an Initial Excess Emissions Report no later than the next regular business day after the time of discovery of an excess emission, pursuant to 20.2.7.110.A(1) NMAC.** The Initial EER for event 012702-05022025-01 at Cedar Fed TB was due on April 25, 2025. Matador submitted the Initial EER on May 2, 2025, seven (7) days late.
9. **Failure to submit a Final Excess Emissions Report no later than ten (10) days after the end of the excess emission event, pursuant to 20.2.7.110.A(2) NMAC.** Between February 14, 2025, and May 5, 2025, Matador failed to submit six (6) Final EERs within the defined regulatory timelines:

Facility	Event	Due	Submitted	Total Days Late
Tiger 14 Facility (AI# 36618)	036618-03182025-01	3/4/2025	4/2/2025	29
Janie Conner Facility (AI# 38395)	038395-03122025-01	3/4/2025	3/27/2025	23
Biggers Fed West TB (AI# 38954)	038954-01302025-01	2/11/2025	2/14/2025	3
Biggers Fed East TB (AI# 39433)	039433-01302025-01	2/11/2025	2/14/2025	3
Boros West Facility (AI# 39564)	039564-02272025-01	3/4/2025	3/27/2025	23
Dee Osborne TB (AI# 40485)	040485-03122025-01	3/4/2025	3/27/2025	23

Please note that the Facilities will appear on NMED’s Enforcement Watch as a result of this NOV (see: <https://www.env.nm.gov/enforcement-watch/>). Further, NMED may issue a press release to local media highlighting your facility as appearing on this webpage. The Facility will remain on the Enforcement Watch website as an active matter until this matter is fully resolved, including the payment of the assessed civil penalty.

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You may obtain a copy of the AQB Civil Penalty Policy located on the Compliance and Enforcement website at: <https://www.env.nm.gov/air-quality/compliance-and-enforcement/>.

### **Requested Information**

In the response to this NOV please provide this information for each violation:

1. A description of the cause of the violation;
2. Documentation of the steps taken to correct the violation to date for violations 1 through 7; and
3. Documentation of steps taken or to be taken to prevent the recurrence of the violation.

With the documentation, please include specific, measurable, and time-bound changes made or to be made addressing any problems causing the violations. Attachment C has been included at the end of the NOV and can be used as a checklist for organizing the response.

Use these instructions to submit the response:

1. All correspondence pertaining to this NOV must be submitted under cover of a properly completed Reporting Submittal Form, emailed to the Enforcement Specialist (contact information below). A copy of the form can be found online at: <https://www.env.nm.gov/air-quality/compliance-and-enforcement/>
2. Submit requested information no later than thirty (30) days after the date of this NOV.
3. Any documents claimed as Confidential Business Information (CBI) pursuant to 20.2.1.115 NMAC must be submitted in separate electronic files from non-CBI documents and identified as CBI.
4. If files cannot be submitted by electronic mail, contact the Enforcement Specialist to request a link to a file transfer platform, or submit records on a thumb drive mailed to the Air Quality Bureau, 525 Camino de los Marquez, Suite 1, Santa Fe, NM 87505 to the attention of Michael Sponseller.
5. Please include any facts, information, or documentation to refute the alleged violations, with the requested information.

After receiving the response to this NOV, NMED may send a settlement offer or compliance order outlining the penalties and corrective actions associated with each of the violations. As NMED's review of the alleged violations is ongoing, NMED reserves the right to assert additional violations at the Facilities if new information becomes available.

If you have questions or believe any statement in this notice is erroneous, please contact Michael Sponseller, Enforcement Specialist, at (505) 629-6968 or [michael.sponseller@env.nm.gov](mailto:michael.sponseller@env.nm.gov) or Kerra Roudebush, Enforcement Manager, at (505) 699-9627 or [kerra.roudebush@env.nm.gov](mailto:kerra.roudebush@env.nm.gov). If you are represented by counsel, please contact Brian Yardman-Frank, Assistant General Counsel, at (505) 709-8671 or [brian.yardman-frank@env.nm.gov](mailto:brian.yardman-frank@env.nm.gov).

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Thank you for your prompt attention to this matter.

Sincerely,

Signed by:



58AA1E562FA4422...

Bret Anderson

Bureau Chief

Environmental Protection Compliance and Enforcement Bureau

cc: Brian Yardman-Frank, OGC  
Kerra Roudebush, EPCEB  
Michael Sponseller, EPCEB

Attachments:

Attachment A: Facility Identifying Information  
Attachment B: Affirmative Defense Evaluations  
Attachment C: Additional Information Form

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Attachment A  
 Facility Identifying Information

AI#	Facility Name	Lat	Long	AIRS#	Permit #
12702	Cedar Fed TB	32.784493	-103.885146	350153023	GCP-O&G 10421
36618	Tiger 14 Facility	32.21105	-104.0508	350151471	GCP-O&G 6771-M11
38395	Janie Conner Facility	32.22198	-104.05078	350151987	GCP-O&G 7929-M9
38954	Biggers Fed West TB	32.125171	-103.410865	350251648	GCP-O&G- 8297-M4
39433	Biggers Fed East TB	32.12338	-103.40212	350251811	GCP-O&G 8718-M3
39564	Boros West Facility	32.049	-103.77	350152362	GCP-O&G 8839-M4
40485	Dee Osborne TB	32.47118	-103.409742	350252239	GCP-O&G 9628-M2

Attachment B  
 Affirmative Defense Evaluations

Affirmative Defense Evaluation for PIN #: MAT-Multi-2501						
Activity No	Event Type (E, M, SS)	Facility Comment	ADDF Accept	If NO, Regulation Citation	Notes	
012702-04232025-01	SS	Underproducing gas rates were redirected to flare because the gas sales pipeline operates at a pressure that requires onsite compression. Onsite compression was unable to stay running due to lower-than-expected gas rates.	No	20.2.7.112.A.9 NMAC	Denied due to the lack of supporting documentation for the method for determining the magnitude and duration of the excess emissions per 20.2.7.110.B.9 NMAC.	
012702-05022025-01	SS	A new compressor (Eng-4) was set on location to provide takeaway and prevent onsite flaring. Unexpectedly low gas production rates were insufficient for current onsite compression.	No	20.2.7.112.A.9 NMAC	Denied due to failure to comply with the notification requirements in Section 110 of 20.2.7 NMAC. The Initial EER was submitted seven (7) days late, per 20.2.7.110.A.1 NMAC.	
036618-03182025-01	SS	Onsite compression experienced intermittent issues. Without onsite compression, gas was unable to reach sales line pressure and resulted in onsite flaring. Well reopening and compressor startup. Gas may be flared as wells on location are reopened and brought up to the required flow rates necessary for compressor startup.	No	20.2.7.112.A.9 NMAC	Denied due to failure to comply with the notification requirements in Section 110 of 20.2.7 NMAC. The Final EER was submitted 29 days late, per 20.2.7.110.A.2 NMAC.	
038395-03122025-01	SS	Onsite compression experienced intermittent issues. Without onsite compression, gas was unable to reach sales line pressure and resulted in onsite flaring. Intermittent takeaway will affect the wells, equipment, and tanks on locations. Resuming operations requires a start procedure to be followed which can result in additional emissions due to restarting equipment or removing unsalable gas from the system.	No	20.2.7.112.A.9 NMAC	Denied due to failure to comply with the notification requirements in Section 110 of 20.2.7 NMAC. The Final EER was submitted 23 days late, per 20.2.7.110.A.2 NMAC.	
038954-01302025-01	M	Third party takeaway was having issues, causing them not to accept all gas from this location. Third Party limited pipeline capacity resulting in high sales line pressure.	No	20.2.7.112.A.9 NMAC	Denied due to failure to comply with the notification requirements in Section 110 of 20.2.7 NMAC. The Final EER was submitted three (3) days late, per 20.2.7.110.A.2 NMAC.	
039433-01302025-01	M	Third party takeaway was having issues, causing them not to accept all gas from this location. Third Party limited pipeline capacity resulting in high sales line pressure.	No	20.2.7.112.A.9 NMAC	Denied due to failure to comply with the notification requirements in Section 110 of 20.2.7 NMAC. The Final EER was submitted three (3) days late, per 20.2.7.110.A.2 NMAC.	
039564-02272025-01	SS	Midstream takeaway was having issues, causing them not to accept all gas from this location. Pipeline capacity was limited resulting in high sales line pressure. Intermittent line pressure/inconsistent takeaway will affect the wells, equipment, and tanks on locations. Resuming operations requires a start procedure to be followed which can result in additional emissions due to restarting equipment or removing unsalable gas from the system.	No	20.2.7.112.A.9 NMAC	Denied due to failure to comply with the notification requirements in Section 110 of 20.2.7 NMAC. The Final EER was submitted 23 days late, per 20.2.7.110.A.2 NMAC.	
040485-03122025-01	SS	Third party takeaway was having issues, causing them not to accept all gas from this location. Third Party limited pipeline capacity resulting in high sales line pressure. Intermittent line pressure/inconsistent takeaway will affect the wells, equipment, and tanks on locations. Resuming operations requires a start procedure to be followed which can result in additional emissions due to restarting equipment or removing unsalable gas from the system.	No	20.2.7.112.A.9 NMAC	Denied due to failure to comply with the notification requirements in Section 110 of 20.2.7 NMAC. The Final EER was submitted 23 days late, per 20.2.7.110.A.2 NMAC.	

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Attachment C

This form must be completed and signed by the facility's Responsible Official (Title V) or other designee and returned no later than thirty (30) days after the date of this Notice of Violation. Documentation for additional information (in addition to this form) must be submitted electronically to Enforcement Specialist Michael Sponseller at [michael.sponseller@env.nm.gov](mailto:michael.sponseller@env.nm.gov) or Enforcement Manager Kerra Roudebush at [kerra.roudebush@env.nm.gov](mailto:kerra.roudebush@env.nm.gov).

All submittals must be submitted using the Reporting Submittal Form. The Reporting Submittal Form and instructions can be located at: <https://www.env.nm.gov/air-quality/compliance-and-enforcement/#>.

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*I hereby verify that Matador Production Company has initiated the required additional information response outlined in this Notice of Violation. The following information has been submitted or will be submitted by the dates indicated below for each violation. All required documentation will be submitted electronically no later than thirty (30) days after the date of this Notice of Violation.*

Date NOV received: \_\_\_\_\_

*Alleged Violation 1*

\_\_\_\_\_ *A description of the cause of the violation*

\_\_\_\_\_ *Documentation of the steps taken to correct the violation to date*

\_\_\_\_\_ *Documentation of steps taken (or to be taken) to prevent recurrence of this violation (include date if not yet completed)*

*Alleged Violation 2*

\_\_\_\_\_ *A description of the cause of the violation*

\_\_\_\_\_ *Documentation of the steps taken to correct the violation to date*

\_\_\_\_\_ *Documentation of steps taken (or to be taken) to prevent recurrence of this violation (include date if not yet completed)*

*Alleged Violation 3*

\_\_\_\_\_ *A description of the cause of the violation*

\_\_\_\_\_ *Documentation of the steps taken to correct the violation to date*

\_\_\_\_\_ *Documentation of steps taken (or to be taken) to prevent recurrence of this violation (include date if not yet completed)*

*Alleged Violation 4*

\_\_\_\_\_ *A description of the cause of the violation*

\_\_\_\_\_ *Documentation of the steps taken to correct the violation to date*

\_\_\_\_\_ *Documentation of steps taken (or to be taken) to prevent recurrence of this violation (include date if not yet completed)*

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*Alleged Violation 5*

- \_\_\_\_\_ *A description of the cause of the violation*
- \_\_\_\_\_ *Documentation of the steps taken to correct the violation to date*
- \_\_\_\_\_ *Documentation of steps taken (or to be taken) to prevent recurrence of this violation (include date if not yet completed)*

*Alleged Violation 6*

- \_\_\_\_\_ *A description of the cause of the violation*
- \_\_\_\_\_ *Documentation of the steps taken to correct the violation to date*
- \_\_\_\_\_ *Documentation of steps taken (or to be taken) to prevent recurrence of this violation (include date if not yet completed)*

*Alleged Violation 7*

- \_\_\_\_\_ *A description of the cause of the violation*
- \_\_\_\_\_ *Documentation of the steps taken to correct the violation to date*
- \_\_\_\_\_ *Documentation of steps taken (or to be taken) to prevent recurrence of this violation (include date if not yet completed)*

*Alleged Violation 8*

- \_\_\_\_\_ *A description of the cause of the violation*
- \_\_\_\_\_ *Documentation of steps taken (or to be taken) to prevent recurrence of this violation (include date if not yet completed)*

*Alleged Violation 9*

- \_\_\_\_\_ *A description of the cause of the violation*
- \_\_\_\_\_ *Documentation of steps taken (or to be taken) to prevent recurrence of this violation (include date if not yet completed)*

\_\_\_\_\_  
**Signature**

\_\_\_\_\_  
**Date**

Printed Name:

Title: