



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

*Well Inspection Program
"Preserving the Integrity of Our Environment"*

15-Nov-05

PURVIS OPERATING CO

3101 N. Pecos St. POB 51990 79710-1990

Midland TX 79705

30-015-33555

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

Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
11/14/2005	Routine/Periodic	Chris Beadle	Yes	No	12/14/2005	iCLB0531853515

Violations

Surface Leaks/Spills

Failure to submit proper documentation (Rul

Comments on Inspection:

Water tank has overflowed impacting soils around un-bermed tank. Contamination has run off to the south east. Drilling pit remains open, oil is on the surface of fluids in the inner horse shoe, wood pallet and other debris are in the muds on east side of outer horseshoe. Liner breached in nothreast side of outer horseshoe, pit walls impacted by pit contents.

Remediation is required. All soil remediation activities that occur on location must comply with the soil remediation guidelines in OCD publication "Guidelines For Remediation of Leaks, Spills, and Releases". This document may be found on the NMOCD web site:

www.emnrd.state.nm.us/ocd, under Publications> Environmental Handbook> Miscellaneous Guidelines> Remediation of Leaks, Spills and Releases.

Notify NMOCD District 2 Office 48 hours prior to any remediation work or prior to taking samples where results of the samples may be submitted to the OCD. Site remediation must begin prior to December 14, 2005.

The NMOCD District II office does not have on file an approved Form C-144 for the registration or closure of this pit as required by NMAC 19.15.2.50. Please have in this office on or before December 14, 2005, a C-144 detailing your closure plan. This plan must include at a minimum:

1. That all excavations are to be delineated for any constituents of concern. This delineation must determine the vertical and horizontal extent of any impacted areas.
2. The NMOCD District II office is to be notified 24 hours prior to commencement of pit closure activities, delineation work, remediation actions and obtaining samples where analysis of such samples are to be submitted to the NMOCD. Failure to notify may result in a requirement to resample.
3. Delineation operations are to commence no later than December 30, 2005.
4. Manner in which the pit will be closed.
5. Fully completed C-144.

A remediation work plan may be required depending on the results of delineation sampling. All oils liquids in this pit must be removed immediately. Notify NMOCD District 2 Office when oil has been removed.

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

Sincerely,


Artesia OCD District Office

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.