



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

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Oil Conservation Division

*New Mexico Department of Energy, Minerals and Natural Resources
"Preserving the Integrity of our Environment"*

02-Dec-05

MERIT ENERGY CO

PO Box 69

Loco Hills NM 88255

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

TURNER B No.039

G-20-17S-31E

30-015-05309-00-00

Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
11/29/2005	Routine/Periodic	Chris Beadle	Yes	No	12/16/2005	iCLB0533347510
Violations						
Absent Well Identification Signs (Rule 103)						
Surface Leaks/Spills						

Comments on Inspection: Road into location is not passable by motor vehicle due to drop off into gully at location entrance. Well sign shows Devon Energy as operator. What appears to be a bradenhead has leaked produced fluids onto location and flowed down slope approximately 40 feet. Chloride residues at wellhead.

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 16, 2005.

Notify NMOCD District 2 Office when well sign has been corrected.

Notify NMOCD District 2 Office when remediation of chlorides on location is completed.

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.

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.