

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E. Director Oil Conservation Division

Undergrand Infection Control Program "Projecting See Endergoes to Segrees of Got Eng Water"

21-Jun-06

MELROSE OPERATING COMPANY

PO BOX 953

MIDLAND TX 79702-0000

LETTER OF VIOLATION and SHUT-IN **DIRECTIVE Failed Mechanical Integrity Test**

Dear Operator:

The following test(s) were performed on the listed dates on the following well(s) shown below in the test detail section.

LOV N. 020641

The test(s) indicates that the well or wells failed to meet mechanical integrity standards of the New Mexico Oil Conservation Division. To comply with guidelines established by the U.S. Environmental Protection Agency, the well(s) must be shut-in immediately until it is successfully repaired. The test detail section which follows indicates preliminary findings and/or probable causes of the failure. This determination is based on a test of your well or facility by an inspector employed by the Oil Conservation Division. Additional testing during the repair operation may be necessary to properly identify the nature of the well failure.

Please notify the proper district office of the Division at least 48 hours prior to the date and time that the well(s) will be retested so the test may be witnessed by a field representative.

MECHANICAL INTEGRITY TEST DETAIL SECTION

ARTESIA UNIT No.029

Active Injection - (All Types)

30-015-01742-00-00 N-35-17S-28E

Test Date:

6/20/2006

Permitted Injection PSI:

Actual PSI:

1000

Test Reason:

Test Result:

9/23/2006 Repair Due:

Test Type:

Annual IMIT

FAIL TYPE: Permit Violation

FAIL CAUSE:

Bradenhead Test

Comments on MIT:

Injection pressure over limit. Bradenhead valve not plumbed to surface. Top of Cement, per well records, on

production casing @ 1730'.

ARTESIA UNIT No.023

Active Injection - (All Types)

30-015-01746-00-00 L-35-17S-28E

Test Date:

6/20/2006

Permitted Injection PSI:

Actual PSI:

950 9/23/2006

Test Reason:

Test Result:

Repair Due:

Test Type:

5-year Test

FAIL TYPE: Casing

FAIL CAUSE:

Std. Annulus Pres. Test

Comments on MIT: Water circulating behind casing.

CONOCO 7 STATE No.005

Active Injection - (All Types)

30-015-23920-00-00 F-7-19S-29E

Test Date:

6/20/2006

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

9/23/2006

Test Type:

Bradenhead Test

FAIL TYPE: Casing

FAIL CAUSE:

Comments on MIT: Hole in casing (Foreman)

CONOCO 7 STATE No.006

Active Injection - (All Types)

30-015-23921-00-00

Test Date:

6/20/2006

Permitted Injection PSI:

Actual PSI:

C-7-19S-29E

Test Reason:

Annual IMIT

Test Result:

Repair Due:

9/23/2006

800

Test Type:

Bradenhead Test

FAIL TYPE: Permit Violation

FAIL CAUSE:

Comments on MIT: Injection pressure over limit

30-015-25160-00-00

CONOCO 7 STATE No.012

Active Injection - (All Types)

Test Date:

6/20/2006

Permitted Injection PSI:

Actual PSI:

K-7-19S-29E

F

660

Test Reason:

Annual IMIT

Test Result:

Repair Due:

9/23/2006

Test Type:

Bradenhead Test

FAIL TYPE: Permit Violation

FAIL CAUSE:

Comments on MIT: Injection pressure over limit

In the event that a satisfactory response is not received to this letter of direction by the "Repair Due:" date shown above, or if the well(s) are not immediately shut-in, 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: Pressure Tests are performed prior to initial injection, after repairs and otherwise, every 5 years; Bradenhead Tests are performed annually. Information in Detail Section comes directly from field inspector data entries - not all blanks will contain data. "Failure Type" and "Failure Cause" and any Comments are not to be interpreted as a diagnosis of the condition of the wellbore. Additional testing should be conducted by the operator to accurately determine the nature of the actual failure. * Significant Non-Compliance events are reported directly to the EPA, Region VI, Dallas, Texas.