008 1140 0001 4145

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson

Governor

Joanna Prukop Cabinet Secretary Reese Fullerton **Deputy Cabinet Secretary** Mark Fesmire Division Director Oil Conservation Division



Response Required - Deadline Enclosed

20-Mar-09

LOV NO. 02-09-00

DORAL ENERGY CORP. 415 W. WALL ST, SUITE 500 MIDLAND TX 79701-

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.

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

WEST ARTESIA GRAYBURG UNIT No.001

30-015-02645-00-00

30-015-02655-00-00

6/8/2009

C-8-18S-28E

Active Injection - (All Types)

Test Date: Test Reason:

3/18/2009 Annual IMIT

Permitted Injection PSI: Test Result:

Actual PSI:

Repair Due: 6/21/2009

Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: Operator reported that well would not pass and must be repaired.

WEST ARTESIA GRAYBURG UNIT No.011

Active Injection - (All Types)

K-8-18S-28E

Test Date:

3/5/2009

Permitted Injection PSI:

Test Result:

Actual PSI:

Test Reason:

5-year Test

Repair Due:

Std. Annulus Pres. Test

FAIL TYPE: Tubing

Comments on MIT:

Unable to pressure up. Casing pressure same as tubing pressure 220psi. Shut-in well.

FAIL CAUSE:



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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.

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.