

NEW MEXICO ENERGY, MINERALS NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

rude aspection Program "Perse view the Integrity of the fundament"

16-Dec-05

BROTHERS PROD CO INC

PO BOX 7515 MIDLAND TX 79708

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

JOHNSON B FEDERAL A\C 2 No.001

Inspection

Type Inspection Date

Inspector Chris Beadle Violation?

Yes

D-15-18S-31E *Significant Non-Compliance?

No

30-015-05556-00-00 Corrective

1/5/2006

Inspection No. Action Due By:

iCLB0533944390

Violations

12/05/2005

Surface Leaks/Spills

Routine/Periodic

Comments on Inspection:

Equipment and Location needs minor attention. Pumpjack operating, packing is leaking, fresh oill pooled at wellhead. Older contamination around base of pumpjack.

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 be completed prior to January 9, 2005.

Notify NMOCD District 2 Office when remediation 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 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.