



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

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Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

14-Mar-07

**BEPCO, LP**

PO BOX 2760

MIDLAND TX 79702

**LOV NO. 027007**

## 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

#### POKER LAKE UNIT No.165

M-32-23S-30E

30-015-31334-00-00

| Inspection Date      | Type Inspection  | Inspector  | Violation? | *Significant Non-Compliance? | Corrective Action Due By: | Inspection No. |
|----------------------|------------------|------------|------------|------------------------------|---------------------------|----------------|
| 03/14/2007           | Routine/Periodic | Ron Harvey | Yes        | No                           | 6/17/2007                 | iREH0707337875 |
| <b>Violations</b>    |                  |            |            |                              |                           |                |
| Surface Leaks/Spills |                  |            |            |                              |                           |                |

**Comments on Inspection:** Wellhead actively leaking with fresh contamination on and around wellhead. Area needs to be cleaned up as soon as possible. Violation of Rule 13. Photos taken.

#### POKER LAKE UNIT No.163

F-6-24S-30E

30-015-31692-00-00

| Inspection Date                             | Type Inspection  | Inspector  | Violation? | *Significant Non-Compliance? | Corrective Action Due By: | Inspection No. |
|---------------------------------------------|------------------|------------|------------|------------------------------|---------------------------|----------------|
| 03/14/2007                                  | Routine/Periodic | Ron Harvey | Yes        | No                           | 4/16/2007                 | iREH0707338638 |
| <b>Violations</b>                           |                  |            |            |                              |                           |                |
| Absent Well Identification Signs (Rule 103) |                  |            |            |                              |                           |                |

**Comments on Inspection:** Pit closed, surface contoured. Location and equipment ok. Well sign does not have API on it in violation of Rule 103. Photo taken.

**POKER LAKE UNIT No.164**

K-6-24S-30E

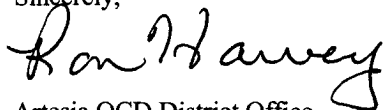
30-015-31694-00-00

| Inspection<br>Date                          | Type Inspection  | Inspector  | Violation? | *Significant<br>Non-Compliance? | Corrective<br>Action Due By: | Inspection No. |
|---------------------------------------------|------------------|------------|------------|---------------------------------|------------------------------|----------------|
| 03/14/2007                                  | Routine/Periodic | Ron Harvey | Yes        | No                              | 4/16/2007                    | iREH0707339088 |
| <b>Violations</b>                           |                  |            |            |                                 |                              |                |
| Absent Well Identification Signs (Rule 103) |                  |            |            |                                 |                              |                |

**Comments on Inspection:** Pit closed, surface contoured. Location and equipment ok. Information on well sign does not contain API number in violation of Rule 103. Photo taken.

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.