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## NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

## BILL RICHARDSON

Governor

Joanna Prukop Cabinet Secretary Mark E. Fesmire, P.E.
Director
Oil Conservation Division

\*Response Required - Deadline Enclosed\*

30 015 20366

23-May-08

FOREST OIL CORPORATION

3504 W. County Rd. Hobbs NM 88240

LOV NO. 2-8-102

**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

SKELLY UNIT No.019

F-15-17S-31E

30-015-05155-00-00

Inspection

Type Inspection

Violation?

\*Significant Non-Compliance? Corrective

Inspection No.

Date 05/19/2008

Bradenhead

Richard Inge

Inspector

Yes

No

Action Due By: 6/6/2008

iREI0812757108

Comments on Inspection:

Violation of OCD rule 19.15.2.50.A - Unregistered pit on location.

Violation of OCD rule 19.15.2.50.F.1 - Pit still open. The lining is down in the pit. A subsequent report of work done was submitted 3/12/07. Pit should have been closed within 6 months of use.

Please submit a C-144 pit closure form by Corrective Action Due By Date.

**SKELLY UNIT No.025** 

I-15-17S-31E

30-015-05160-00-00

Inspection Date

Type Inspection

Inspector Richard Inge Violation? Yes \*Significant Non-Compliance? No Corrective Action Due By: 6/6/2008

Inspection No. iREI0812757112

05/19/2008 Bradenhead Comments on Inspection:

Violation of OCD rule 19.15.2.50.A - Unregistered pit on location.

Violation of OCD rule 19.15.2.50.F.1 - Pit still open. The liner torn and down. There is some

staining on side of pit. Pit should have been closed within 6 months of use.

Please submit a C-144 pit closure form by Corrective Action Due By Date.

Oil Conservation Division \* 1301 W. Grand \* Artesia, New Mexico 88210 Phone: 505-748-1283 \* Fax: 505-748-9720 \* http://www.emnrd.state.nm.us

SKELLY UNIT No.072 Inspection					K-23-17S-31E *Significant	30-015-05372-00-00 Corrective	
Date	Type Inspection	ı	Inspector	Violation?	Non-Compliance?		Inspection No.
05/20/2008	Bradenhead		Richard Inge	Yes	No	6/6/2008	1REI081275717
Comments	on Inspection:	Violation of OCD rule 19.15.2.50 A - Unregistered pit on location					
			D rule 19 15.2.50.1 nould have been cl			ort of workover subm	itted
		Please submit a C	2-144 pit closure f	form by Corre	ctive Action Due By I	Date.	
LEA D No.	001			•	B-26-17S-31E	30-015-05411-00-	00
Inspection	Toma Immantia		Lannadan	Violetie 9	*Significant	Corrective	Inspection No.
Date 05/20/2008	Type Inspection Bradenhead		Inspector Richard Inge	Violation? Yes	Non-Compliance? No	Action Due By: 6/6/2008	iREI081275718
		17.1.7. 6001	_			0/0/2008	IKE10012/3/10
Comments	on Inspection:	Violation of OCL	) rule 19.15.2.50.	A - Unregister	red pit on location.		
			O rule 19.15.2.50.1 ould have been clo			ort of workover subm	itted
		Please submit a C	2-144 pit closure f	orm by Correc	ctive Action Due By [	Date.	
LEA D No.002					A-26-17S-31E	30-015-05412-00-0	00
Inspection	T		F	1/2-1-41 O	*Significant	Corrective	Francetion No.
Date	Type Inspection		Inspector	Violation?	Non-Compliance?	Action Due By:	Inspection No.
05/20/2008	Bradenhead		Richard Inge	Yes	No	6/6/2008	iREI081275718
Comments on Inspection:		Violation of OCD rule 19.15.2.50.F.1 - Pit still open. Subsequent report of workover submitted 05/04/07. Pit should have been closed within 6 months of use.					
		Please submit a C	-144 pit closure fo	orm by Correc	tive Action Due By D	Date.	
SKELLY UNIT No.083		D-26-17S-31E <b>30-015-05418-00-00</b>					
Inspection	Type Inspection		Inspector	Violation?	*Significant	Corrective	Inspection No.
Date 05/20/2008	Bradenhead		Richard Inge	Yes	Non-Compliance? No	Action Due By: 6/6/2008	iREI0812757188
			rule 19.15.2.50.A			0/0/2008	IKL10812/3/186
Comments	n mspection.	Violation of OCD	Tule 19.13.2.30.7	i - Omegister	su pit on location.		
			rule 19.15.2.50.F ald have been close			ort of workover submit	tted
		Please submit a C	-144 pit closure fo	orm by Correc	tive Action Due By D	ate	
SKELLY UN	VIT No.084			** *** ***	A-27-17S-31E		0
SKELLY UN					*Significant	30-015-05423-00-0 Corrective	
Inspection Date	Type Inspection		Inspector	Violation?	*Significant Non-Compliance?	30-015-05423-00-0 Corrective Action Due By:	Inspection No.
Inspection Date 05/19/2008	Type Inspection Bradenhead	1	Richard Inge	Violation? Yes	*Significant Non-Compliance? No	30-015-05423-00-0 Corrective Action Due By: 6/6/2008	
Inspection Date	Type Inspection Bradenhead Inspection:	I Violation of OCD	Richard Inge rule 19.15.2.50.F.	Violation? Yes .1 - Pit still op	*Significant Non-Compliance?	30-015-05423-00-0 Corrective Action Due By: 6/6/2008 ort of work completed	Inspection No.
Inspection Date 05/19/2008	Type Inspection Bradenhead In Inspection:	I Violation of OCD submitted 04/10/0°	Richard Inge rule 19.15.2.50.F. 7. Pit should hav	Violation? Yes 1 - Pit still op e been closed	*Significant Non-Compliance? No No sen. Subsequent repo	30-015-05423-00-0 Corrective Action Due By: 6/6/2008 ort of work completed se.	Inspection No.
Inspection Date 05/19/2008	Type Inspection Bradenhead n Inspection:	I Violation of OCD submitted 04/10/0°	Richard Inge rule 19.15.2.50.F. 7. Pit should hav	Violation? Yes 1 - Pit still ope been closed	*Significant Non-Compliance? No en. Subsequent repo within 6 months of us	30-015-05423-00-0 Corrective Action Due By: 6/6/2008 ort of work completed se.	Inspection No. iREI0812757198
Inspection Date 05/19/2008 Comments of KELLY UN Inspection	Type Inspection Bradenhead In Inspection: S IT No.096	Violation of OCD submitted 04/10/0 Please submit a C-	Richard Inge rule 19.15.2.50.F. 7. Pit should hav	Violation? Yes 1 - Pit still ope been closed	*Significant Non-Compliance? No ten. Subsequent repo within 6 months of us ive Action Due By Da W-27-17S-31E *Significant	30-015-05423-00-0 Corrective Action Due By: 6/6/2008 ort of work completed se. ate. 30-015-05424-00-06 Corrective	Inspection No. iREI0812757198
Inspection Date 05/19/2008 Comments of KELLY UN Inspection Date	Type Inspection Bradenhead In Inspection: S IT No.096 Type Inspection	Violation of OCD submitted 04/10/0 Please submit a C-	Richard Inge rule 19.15.2.50.F. 7. Pit should hav 144 pit closure for	Violation? Yes 1 - Pit still ope been closed rm by Correct Violation?	*Significant Non-Compliance? No  en. Subsequent repo within 6 months of us  ive Action Due By Da  W-27-17S-31E  *Significant Non-Compliance?	Corrective Action Due By: 6/6/2008 ort of work completed se. ate. 30-015-05424-00-06 Corrective Action Due By:	Inspection No. iREI0812757198
Inspection Date 05/19/2008 Comments of KELLY UN Inspection Date	Type Inspection Bradenhead In Inspection:  IT No.096 Type Inspection Bradenhead	Violation of OCD submitted 04/10/0' Please submit a C-	Richard Inge rule 19.15.2.50.F. 7. Pit should hav	Violation? Yes A - Pit still ope been closed rm by Correct Violation? Yes	*Significant Non-Compliance? No  ben. Subsequent repo within 6 months of us  ive Action Due By Da  W-27-17S-31E  *Significant Non-Compliance? No	Corrective Action Due By: 6/6/2008 ort of work completed se. ate. 30-015-05424-00-06 Corrective Action Due By:	Inspection No. iREI0812757198
Inspection Date 05/19/2008 Comments of KELLY UN Inspection Date 5/19/2008	Type Inspection Bradenhead In Inspection:  IT No.096 Type Inspection Bradenhead Inspection:	Violation of OCD submitted 04/10/0 Please submit a C-	Richard Inge rule 19.15.2.50.F. 7. Pit should hav 144 pit closure for nspector Richard Inge rule 19.15.2.50.A	Violation? Yes 1 - Pit still ope been closed rm by Correct  Violation? Yes - Unregistered 1 - Pit still ope	*Significant Non-Compliance? No  ben. Subsequent repo within 6 months of us  ive Action Due By Da  W-27-17S-31E  *Significant Non-Compliance? No	30-015-05423-00-0  Corrective Action Due By: 6/6/2008 ort of work completed se. ate.  30-015-05424-00-00  Corrective Action Due By: 6/6/2008 rt of work completed	Inspection No. iREI0812757198
Inspection Date 05/19/2008 Comments of KELLY UN Inspection Date 5/19/2008	Type Inspection Bradenhead In Inspection:  IT No.096 Type Inspection Bradenhead Inspection:	Violation of OCD submitted 04/10/0 Please submit a C-	Richard Inge rule 19.15.2.50.F. 7. Pit should have 144 pit closure for nspector Richard Inge rule 19.15.2.50.A rule 19.15.2.50.F. 6. Pit should have	Violation? Yes 1 - Pit still ope been closed rm by Correct  Violation? Yes - Unregistered 1 - Pit still ope been closed	*Significant Non-Compliance? No  nen. Subsequent repo within 6 months of us  ive Action Due By Da  W-27-17S-31E  *Significant Non-Compliance? No d pit on location.  en. Subsequent repoi	Corrective Action Due By: 6/6/2008 ort of work completed se.  30-015-05424-00-00 Corrective Action Due By: 6/6/2008 rt of work completed se.	Inspection No. iREI0812757198  O Inspection No.

SKELLY UNIT No.090 C-28-17S-31E 30-015-05428-00-00 Inspection \*Significant Corrective Inspector Inspection No. Type Inspection Violation? Non-Compliance? Action Due By: Date iREI0812757208 6/6/2008 05/19/2008 Bradenhead Richard Inge Yes Comments on Inspection: Violation of OCD rule 19.15.2.50.A - Unregistered pit on location. Violation of OCD rule 19.15.2.50.F 1 - Pit still open The liner is down in the pit. Subsequent report of work completed submitted 10/11/06. Pit should have been closed within 6 months of use. Please submit a C-144 pit closure form by Corrective Action Due By Date. **SKELLY UNIT No.089** B-28-17S-31E 30-015-05429-00-00 Inspection \*Significant Corrective Type Inspection Inspector Violation? Inspection No. Non-Compliance? Date Action Due By: iREI0812757207 05/19/2008 Bradenhead Richard Inge 6/6/2008 Yes No Comments on Inspection: Violation of OCD rule 19.15.2.50.A - Unregistered pit on location. Violation of OCD rule 19.15.2.50.F.1 - Pit still open There is a hole in the liner. Subsequent report of work completed submitted 8/22/07. Pit should have been closed within 6 months of use. Please submit a C-144 pit closure form by Corrective Action Due By Date. **SKELLY UNIT No.106** C-15-17S-31E 30-015-20366-00-00 \*Significant Corrective Inspection Type Inspection Inspector Violation? Inspection No. Date Non-Compliance? Action Due By: 05/19/2008 Bradenhead Richard Inge Yes No 6/6/2008 iREI0812757103 Violation of OCD rule 19.15.2.50.A - Unregistered pit on location. Comments on Inspection: Violation of OCD rule 19.15.2.50.F.1 - Pit still open. The lining is down in the pit. A subsequent report of work done was submitted 3/12/07. Pit should have been closed within 6 months of use. Please submit a C-144 pit closure form by Corrective Action Due By Date. G-14-17S-31E 30-015-20469-00-00 SKELLY UNIT No.110 \*Significant Inspection Corrective Type Inspection Inspector Violation? Inspection No. Date Non-Compliance? Action Due By: 05/19/2008 Bradenhead Richard Inge Yes 6/6/2008 iREI0812757092 No Comments on Inspection: Violation of OCD rule 19.15.2.50.F.1 - Pit still open. Pit was registered 3/15/07 and subsequent report of work done submitted 4/20/07. Pit should have been closed within 6 months of use. Please submit a C-144 pit closure form by Corrective Action Due By Date. **SKELLY UNIT No.300** J-23-17S-31E 30-015-29452-00-00 Inspection \*Significant Corrective Type Inspection Inspector Violation? Inspection No. Date Non-Compliance? Action Due By: 05/20/2008 Bradenhead 6/6/2008 iREI0812757173 Richard Inge Yes Comments on Inspection: Violation of OCD rule 19.15.2.50.A - Unregistered pit on location. Violation of OCD rule 19.15.2.50.F.1 - Pit still open. Subsequent report of workover submitted 10/11/06. Pit should have been closed within 6 months of use. Please submit a C-144 pit closure form by Corrective Action Due By Date. SKELLY UNIT No.301 E-28-17S-31E 30-015-29496-00-00 Inspection \*Significant Corrective Type Inspection Inspector Violation? Inspection No. Date Non-Compliance? Action Due By: 05/19/2008 Routine/Periodic Richard Inge iREI0814047428 Yes No 6/6/2008 Comments on Inspection: Violation of OCD rule 19.15.2.50.A - Unregistered pit on location.

Violation of OCD rule 19.15.2.50.F.1 - Pit still open. Pit should have been closed within 6 months of use.

Please submit a C-144 pit closure form by Corrective Action Due By Date.

Trease submit a C-144 pit closure form by Corrective Action Due by Date.

Oil Conservation Division \* 1301 W. Grand \* Artesia, New Mexico 88210 Phone: 505-748-1283 \* Fax: 505-748-9720 \* http://www.emnrd.state.nm.us

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.