

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

18-Jun-09

MELROSE OPERATING COMPANY 1000 W. WILSHIRE BLVD. SUITE 223 OKLAHOMA CITY OK 73116-

LOV NO. 02-09-026

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

ARTESIA UN	NIT No.001			30-015-01564-00-00
Test Date:	6/9/2009	Active Injection - (All Types) Permitted Injection PSI: 394	Actual PSI:	L-26-17S-28E 1150
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	9/12/2009
Test Type: Comments on	Bradenhead Test MIT: Injection pressure of	FAIL TYPE: Permit Violation over limit	FAIL CAUSE:	
ARTESIA UNIT No.053		Active Injection (All Tymes)		30-015-01788-00-00
Test Date:	6/9/2009	Active Injection - (All Types) Permitted Injection PSI: 436	Actual PSI:	J-3-18S-28E 920
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	9/12/2009
Test Type:	Bradenhead Test	FAIL TYPE: Permit Violation	FAIL CAUSE:	
Comments on	MIT: Injection pressure o	ver limit		
ARTESIA UNIT No.054				_30-015-01801-00-00
		Active Injection - (All Types)		K-3-18S-28E
Test Date:	6/9/2009	Permitted Injection PSI: 434	Actual PSI:	1000
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	9'12/2009
Test Type:	Bradenhead Test	FAIL TYPE: Permit Violation	FAIL CAUSE:	
Comments on I	MIT: Injection pressure ov	ver limit		

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

STATE 14 B No.003 30-015-01855-00-00

Active Injection - (All Types)

F-14-18S-28E

Test Date:

6'9/2009

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

510 9/12/2009

Test Type:

Bradenhead Test

FAIL TYPE: Tubing

FAIL CAUSE:

ARTESIA UNIT No.046

Comments on MIT: Operator reported a hole in the tubing.

30-015-02541-00-00

Active Injection - (All Types)

F-3-18S-28E

Test Date:

6/9/2009

Permitted Injection PSI: 550

Actual PSI: 1050

Test Reason:

Annual IMIT

Test Result:

Repair Due:

9/12/2009

Test Type:

Bradenhead Test

FAIL TYPE: Permit Violation

FAIL CAUSE:

Comments on MIT: Injection pressure over limit. Raised from 425 to 850 by IPI-301 on 6/30/2008.

CONOCO 7 STATE No.006

GUAJALOTE STATE No.002

Active Injection - (All Types)

30-015-23921-00-00 C-7-19S-29E

Test Date:

6/9/2009

Permitted Injection PSI: 435

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

9/12/2009

Test Type:

Bradenhead Test

FAIL TYPE: Permit Violation

FAIL CAUSE:

Comments on MIT: Injection pressure over limit

30-015-24930-00-00

Test Date:

6/9/2009

Active Salt Water Disposal Well Permitted Injection PSI: 455

Actual PSI:

O-5-19S-29E 600

Test Reason:

Annual IMIT

Test Result:

to the Division for an order summoning you to a hearing before a Division Examiner in Santa Fe to show cause why you

Repair Due:

9/12/2009

Test Type:

Bradenhead Test Comments on MIT: Injection pressure over limit Shut-in.

FAIL TYPE: Permit Violation **FAIL CAUSE:**

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

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.