



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

FOR INFORMATION ONLY

Response Required – Deadline Enclosed

Underground Injection Control Program

"Protecting Our Underground Sources of Drinking Water"

10-Sep-08

BC OPERATING, INC.
P. O. BOX 50820
MIDLAND TX 79710-

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

SOUTH LAGLIE JAL UNIT No.018

✓ **30-025-11642-00-00**
E-17-25S-37E

Test Date:	9/4/2008	Expired TA Injection - (All Types)	Permitted Injection PSI:	Actual PSI:
Test Reason:	TA Status Test	Test Result:	F	Repair Due:
Test Type:	Std. Annulus Pres. Test	FAIL TYPE:	Other Internal Failure	12/8/2008
Comments on MIT:	WOULD NOT PRESSURE UP			
		FAIL CAUSE:		

RHODES YATES UNIT No.001

✓ **30-025-12033-00-00**
I-21-26S-37E

Test Date:	9/3/2008	Active Injection - (All Types)	Permitted Injection PSI:	Actual PSI:
Test Reason:	Annual IMIT	Test Result:	F	Repair Due:
Test Type:	Std. Annulus Pres. Test	FAIL TYPE:	Other Internal Failure	12/7/2008
Comments on MIT:	SALT WATER ON SURFACE WHEN PRESSURING UP. FAILURE NO CHART			
		FAIL CAUSE:		

W H RHODES A FEDERAL No.005

✓ **30-025-12037-00-00**
O-22-26S-37E

Test Date:	9/3/2008	Expired TA Injection - (All Types)	Permitted Injection PSI:	Actual PSI:
Test Reason:	Annual IMIT	Test Result:	F	Repair Due:
Test Type:	Std. Annulus Pres. Test	FAIL TYPE:	Other Internal Failure	12/7/2008
Comments on MIT:	PrESSURED UP TWICE DROPPED WITHIN 5 MINS. PT FOR TA STATUS			
		FAIL CAUSE:		

RHODES YATES UNIT No.012

Expired TA Injection - (All Types)

✓ 30-025-12062-00-00

N-27-26S-37E

Test Date: 9/3/2008

Permitted Injection PSI:

Actual PSI:

Test Reason: Annual IMIT

Test Result: F

Repair Due: 12/7/2008

Test Type: Std. Annulus Pres. Test

FAIL TYPE: Equipment - Specify in Co

FAIL CAUSE:

Comments on MIT: FLANGE ON WELL HEAD LEAKING DID NOT TEST; NO CHART

W H RHODES B FEDERAL NCT-1 No.009

Active Injection - (All Types)

/ 30-025-12070-00-00

P-27-26S-37E

Test Date: 9/3/2008

Permitted Injection PSI:

Actual PSI:

Test Reason: Annual IMIT

Test Result: F

Repair Due: 12/7/2008

Test Type: Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: WOULD NOT HOLD PRESSURE;

W H RHODES B FEDERAL NCT-1 No.013

Active Injection - (All Types)

30-025-12071-00-00

O-27-26S-37E

Test Date: 9/3/2008

Permitted Injection PSI:

Actual PSI:

Test Reason: Annual IMIT

Test Result: F

Repair Due: 12/7/2008

Test Type: Std. Annulus Pres. Test

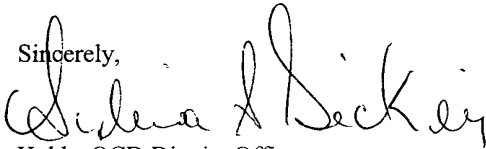
FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: NIPPLE/SWEDGE NEEDS TO BE REPLACED; POSSIBLE CASING LEAK; NO CHART

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. Such a hearing may result in imposition of CIVIL PENALTIES for your violation of OCD rules.

Sincerely,

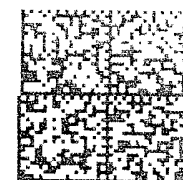


Hobbs OCD District Office

COMPLIANCE OFFICER

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.

EMNRD
OIL CONSERVATION DIVISION
1625 N FRENCH DRIVE
HOBBS NM 88240



09/17/2008
HASLER
\$0.422
09/17/2008
Mailed From 88240
US POSTAGE

BC OPERATING INC.
P.O. BOX 50820
MIDLAND, TX 79710