

## NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON** 

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

Field Inspection Program
"Preserving the Integrity of Our Environment"

10-Oct-08

## EOR OPERATING COMPANY

One Riverway SUITE 610 Houston TX 77056

**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.

|                                |                 |                | INSPECTIO                          | N DETAIL   | SECTION                                       | ,   |                   |
|--------------------------------|-----------------|----------------|------------------------------------|------------|---|---|-------------------|
| MILNESAN<br>Inspection<br>Date | ND UNIT No.1    |                | Inspector                          | Violation? | E-18-8S-35E<br>*Significant<br>Non-Compliance | 30-041-00086-00-<br>Corrective<br>Action Due By:        | 00 Inspection No. |
| 10/10/2008                     | Plugged Well    | Surface Restor | Maxey Brown                        | Yes        | No  | 1/13/2009   | iMGB0828433637    |
| Comments                       | on Inspection:  |                | ASE. RULE 202.<br>HIS IS IST LETTI |            | EMOVE STEEL FLO<br>COMPLIANCE.                | OWLINE FROM   |                   |
| MILNESAND UNIT No.173          |                 |                |                                    |            | A-14-8S-34E                                   | /30-041-00120-00-                                       | 00                |
| Inspection<br>Date             | Type Inspection | 1              | Inspector                          | Violation? | *Significant<br>Non-Compliance                | Corrective ? Action Due By:                             | Inspection No.    |
| 10/10/2008                     | Plugged Well    | Surface Restor | Maxey Brown                        | Yes        | No  | 1/13/2009   | iMGB0828435866    |
| Comments                       | on Inspection:  | CONDUIT, ALS   | O REMOVE FLO<br>CES OF WOOD SO     | WLINE FROI | M LOCATION. IN                                | C STUB POLE AND<br>ADDITON REMOVE<br>THIS IS IST LETTER | R OF              |
| MILNESAND UNIT No.135          |                 |                |                                    |            | O-7-8S-35E                                    | √ 30-041-10045-00-                                      | 00                |
| Inspection<br>Date             | Type Inspection | 1              | Inspector                          | Violation? | *Significant<br>Non-Compliance                | Corrective ? Action Due By:                             | Inspection No.    |
| 10/10/2008                     | Plugged Well    | Surface Restor | Maxey Brown                        | Yes        | No  | 1/13/2009   | iMGB0828437230    |
| Comments                       | on Inspection:  |                |                                    |            | EMOVE 2 JTS OF T<br>I LETTER OF NON           | TBG, POLISH ROD, RO<br>N-COMPLIANCE.                    | OD                |

MILNESAND UNIT No.137

I-7-8S-35E

30-041-10050-00-00

Inspection Date Type Inspection Inspector Violation? Significant Non-Compliance? Action Due By: Inspection No.

10/10/2008 Plugged Well Surface Restor Maxey Brown Yes No 1/13/2009 iMGB0828437901

Comments on Inspection: DO NOT RELEASE. RULE 202. NEED TO REMOVE ELEC STUB POLE AND CONDUIT,

ELECTRIC CONTROL BOX, 1 JT OF TBG. THIS IS 1ST LETTER OF NON-COMPLIANCE.

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,

**COMPLIANCE OFFICER** 

Hobbs 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

EMNRD
OIL CONSERVATION DIVISION
1625 N FRENCH DRIVE
HOBBS NM 88240

FIRST CLASS



017H15554612 \$0.429 10/10/2008 Mailed From 88240

EOR OPERATING COMPANY ONE RIVERWAY SUITE 610 HOUSTON TX 77056