



# 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\***

*Field Inspection Program*

*"Preserving the Integrity of Our Environment"*

18-Nov-08

**BC OPERATING, INC.**

P. O. BOX 50820

MIDLAND TX 79710

**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***

**W H RHODES B FEDERAL NCT-1 No.012**

O-26-26S-37E ✓ **30-025-11980-00-00**

Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
11/18/2008	Routine/Periodic	Mark Whitaker	Yes	No	2/21/2009	iMAW0832346124
<b>Violations</b>						
Idle well (Rule 201)						

**Comments on Inspection:** No reported injection. Well shows to be T/A'd. T/A status has expired. Recent MIT does not meet the standard for T/A status. NEED TO SUBMIT PROPER PAPERWORK SHOWING WELL IS ACTIVE, RETURN WELL TO ACTIVE STATUS, PLUG AND ABANDON WELL, OR APPLY TO RETURN WELL TO T/A STATUS. 1st letter of non-compliance. MW

**W H RHODES A FEDERAL No.006**

L-22-26S-37E ✓ **30-025-12038-00-00**

Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
11/18/2008	Routine/Periodic	Mark Whitaker	Yes	No	2/21/2009	iMAW0832345508
<b>Violations</b>						
Idle well (Rule 201)						

**Comments on Inspection:** No reported injection. Well shows to be T/A'd. T/A status has expired. Recent MIT does not meet the standard for T/A status. NEED TO SUBMIT PROPER PAPERWORK SHOWING WELL IS ACTIVE, RETURN WELL TO ACTIVE STATUS, PLUG AND ABANDON WELL, OR APPLY TO RETURN WELL TO T/A STATUS. 1st letter of non-compliance. MW

**W H RHODES B FEDERAL NCT-1 No.016**

F-26-26S-37E ✓ 30-025-25424-00-00

Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
11/18/2008	Routine/Periodic	Mark Whitaker	Yes	No	2/21/2009	iMAW0832346292
<b>Violations</b> Idle well (Rule 201)						

**Comments on Inspection:** No reported injection. Well shows to be T/A'd. T/A status has expired. Recent MIT does not meet the standard for T/A status. NEED TO SUBMIT PROPER PAPERWORK SHOWING WELL IS ACTIVE, RETURN WELL TO ACTIVE STATUS, PLUG AND ABANDON WELL, OR APPLY TO RETURN WELL TO T/A STATUS. 1st letter of non-compliance. MW

**W H RHODES B FEDERAL NCT-1 No.017**

D-26-26S-37E ✓ 30-025-25425-00-00

Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
11/18/2008	Routine/Periodic	Mark Whitaker	Yes	No	2/21/2009	iMAW0832346400
<b>Violations</b> Idle well (Rule 201)						

**Comments on Inspection:** No reported injection. Well shows to be T/A'd. T/A status has expired. Recent MIT does not meet the standard for T/A status. NEED TO SUBMIT PROPER PAPERWORK SHOWING WELL IS ACTIVE, RETURN WELL TO ACTIVE STATUS, PLUG AND ABANDON WELL, OR APPLY TO RETURN WELL TO T/A STATUS. 1st letter of non-compliance. MW

**W H RHODES B FEDERAL NCT-1 No.019**

J-26-26S-37E ✓ 30-025-25426-00-00

Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
11/18/2008	Routine/Periodic	Mark Whitaker	Yes	No	2/21/2009	iMAW0832346505
<b>Violations</b> Idle well (Rule 201)						

**Comments on Inspection:** No reported injection. Well shows to be T/A'd. T/A status has expired. Recent MIT does not meet the standard for T/A status. NEED TO SUBMIT PROPER PAPERWORK SHOWING WELL IS ACTIVE, RETURN WELL TO ACTIVE STATUS, PLUG AND ABANDON WELL, OR APPLY TO RETURN WELL TO T/A STATUS. 1st letter of non-compliance. MW

**W H RHODES B FEDERAL NCT 2 No.005**

J-28-26S-37E ✓ 30-025-25692-00-00

Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
11/18/2008	Routine/Periodic	Mark Whitaker	Yes	No	2/21/2009	iMAW0832345951
<b>Violations</b> Idle well (Rule 201)						

**Comments on Inspection:** No reported injection. Well shows to be T/A'd. T/A status has expired. Recent MIT does not meet the standard for T/A status. NEED TO SUBMIT PROPER PAPERWORK SHOWING WELL IS ACTIVE, RETURN WELL TO ACTIVE STATUS, PLUG AND ABANDON WELL, OR APPLY TO RETURN WELL TO T/A STATUS. 1st letter of non-compliance. MW

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,

  
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



HASLER

017H15554612

\$0.420

11/18/2008

Mailed From 88240

US POSTAGE

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