



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	
		Violations					
		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	
		Violations					
		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
Violations 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
Violations 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
Violations 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
Violations 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.

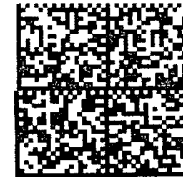
Sincerely,


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