

## NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

## BILL RICHARDSON

Governor Jim Noel Cabinet Secretary Karen W. Garcia Deputy Cabinet Secretary Mark E. Fesmire, P.E. Director Oil Conservation Division

" Place South Games Sand "It concepts have pay of One Environment"

20-Oct-10

## RHOMBUS OPERATING CO LTD

P. O. BOX 8316 MIDLAND TX 79708-8316

## **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 DETAII	L SECTION		
NORTHWEST EUMONT UNIT No.100			1	Vialati - 9	E-12-19S-36E *Significant	30-025-03997-00- Corrective	
Date	Type Inspection		Inspector	Violation?	Non-Compliance?	Action Due By:	Inspection No.
10/19/2010	Routine/Period Violations Absent Well Identi		Mark Whitaker	Yes	No	11/26/2010	iMAW1029248822
Comments		0		5.8), NEED 7	O REPLACE WELL	SIGN 2ND NOTICE	
NORTHWI	EST EUMONT	UNIT No.115			N-14-19S-36E	30-025-04014-00-	00
Inspection Date	Type Inspection		Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
10/19/2010	Routine/Period	ic	Mark Whitaker	Yes	No	11/26/2010	iMAW1029245955
Comments					VE NEED TO CONT.		161
NORTHWEST EUMONT UNIT No.112 Inspection Date Type Inspection		Inspector	Violation?	L-14-19S-36E *Significant Non-Compliance?	30-025-04016-00- Corrective Action Due By:	00 Inspection No.	
10/19/2010	Routine/Period Violations Idle well (Rule 201		Mark Whitaker	Yes	No	11/26/2010	iMAW1029245155
Comments of			D 575-393-6161 AN		Valves at wellhead c LE TIME TO VERIF		ST
		Oil Conservation	Division 1625 N		<ul> <li>Hobbs, New Mexico itp://www.emnid.state.ni</li> </ul>		

Inspection		UNIT No.11	1		P-15-19S-36E <sup>*</sup> Significant	30-025-04018-00 Corrective	-00
Date	Type Inspection	1	Inspector	Violation?	Non-Compliance?	Action Due By:	Inspection No.
10/19/2010	Routine/Peric Violations Idle well (Rule 2)		Mark Whitaker	Yes	No	11/23/2010	iMAW102924422
Comments o	on Inspection:	Operator report in tbg. NEED		575-393-61	Fuses on primary line 61 AND SCHEDULE		. Rods
NORTHWE	EST EUMONT	UNIT No.134			N-22-19S-36E	30-025-04032-00	-00
Inspection Date	Type Inspection	h	Inspector	Violation?	*Significant	Corrective	Inspection No.
10/19/2010	Routine/Perio		Mark Whitaker	Yes	Non-Compliance? No	Action Due By: 11/26/2010	1MAW102925921
10/19/2010	Violations			1 00	No	11/20/2010	101700102925921
	General Houseke	eping (Rule 114)					
Comments o	on Inspection:		Pumping unit has no IT FROM LOCATIO		ed from location. NE	ED TO REMOVE	
	EST EUMONT	UNIT No.131			M-23-19S-36E	30-025-04036-00	-00
Inspection Date	Type Inspection	1	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
10/19/2010	Routine/Perio		Mark Whitaker	Yes	Non-Compliance: No	11/26/2010	iMAW102924195
	Violations Idle well (Rule 20	)1)					
Comments (	on Inspection:	line disconnect	ed. Birds nest inside	box. NEED '	Conduit from control FO CONTACT OCD N. 1ST NOTICE. Too	575-393-6161 AND	ower
NORTHWE	ST EUMONT				H-33-19S-36E	30-025-04099-00	-00
						00 020 01000 00	00
Inspection					*Significant	Corrective	
Date	Type Inspection		Inspector	Violation?	Non-Compliance?	Action Due By:	Inspection No.
Date	Routine/Perio Violations	dic	Mark Whitaker	Violation? Yes			•
Date 10/19/2010	Routine/Perio Violations Absent Well Iden	dic tilication Signs (R	Mark Whitaker ule 103)	Yes	Non-Compliance? No	Action Due By: 11/26/2010	Inspection No. iMAW102924015
Date 10/19/2010 Comments o	Routine/Perio Violations Absent Well Iden m Inspection:	dic tification Signs (R No well Sign (I	Mark Whitaker ule 103) Rule 19.15.16.8). NE	Yes	Non-Compliance? No GALL WELL SIGN. 1	Action Due By: 11/26/2010 st notice	iMAW102924015
Date 10/19/2010 Comments o NORTHWE	Routine/Perio Violations Absent Well Iden	dic tification Signs (R No well Sign (I	Mark Whitaker ule 103) Rule 19.15.16.8). NE	Yes	Non-Compliance? No ALL WELL SIGN. 1 L-34-19S-36E	Action Due By: 11/26/2010 st notice 30-025-04111-00	iMAW102924015
Date 10/19/2010 Comments of	Routine/Perio Violations Absent Well Iden m Inspection:	dic tification Signs (R No well Sign (1 ' <b>UNIT No.166</b>	Mark Whitaker ule 103) Rule 19.15.16.8). NE	Yes	Non-Compliance? No GALL WELL SIGN. 1	Action Due By: 11/26/2010 st notice	iMAW102924015
Date 10/19/2010 Comments of NORTHWE Inspection Date	Routine/Perio Violations Absent Well Iden on Inspection: ST EUMONT	dic tilication Signs (R No well Sign (I <b>' UNIT No.166</b>	Mark Whitaker ule 103) Rule 19.15.16.8). NE	Yes ED TO INST	Non-Compliance? No ALL WELL SIGN. 1 L-34-19S-36E *Significant	Action Due By: 11/26/2010 st notice 30-025-04111-00 Corrective	iMAW102924015. -00 Inspection No.
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Date 10/19/2010 Comments of NORTHWE Inspection Date 10/19/2010 Comments of NORTHWE 10/19/2010 Comments of NORTHWE Inspection	Routine/Perio Violations Absent Well Iden in Inspection: ST EUMONT Type Inspection Routine/Perio Violations General Houseke on Inspection: ST EUMONT Type Inspection Routine/Perio Violations Absent Well Iden in Inspection: ST EUMONT	dic tilication Signs (R No well Sign (I <b>'UNIT No.166</b> dic eping (Rule 114) Well plugged I PUMPING UN <b>'UNIT No.161</b> dic tification Signs (R No well Sign (F <b>UNIT No.155</b>	Mark Whitaker ule 103) Rule 19.15.16.8). NE Inspector Mark Whitaker Pumping unit has no IT FROM LOCATIO Inspector Mark Whitaker ule 103) Rule 19 15 16.8 <i>j</i> . NE	Yes ED TO INST Violation? Yes been remov DN_IST NO Violation? Yes ED TO INST	Non-Compliance? No ALL WELL SIGN. 1 L-34-19S-36E *Significant Non-Compliance? No ed from location NEI FICE. O-34-19S-36E *Significant Non-Compliance? No ALL WELL SIGN. 1 F-34-19S-36E *Significant	Action Due By: 11/26/2010 st notice <b>30-025-04111-00</b> Corrective Action Due By: 11/26/2010 ED TO REMOVE <b>30-025-04116-00</b> Corrective Action Due By: 11/26/2010 st notice. <b>30-025-08701-00</b> - Corrective	iMAW102924015 -00 Inspection No. iMAW102923670 -00 Inspection No. iMAW102923846
Date 10/19/2010 Comments of NORTHWE Inspection Date 10/19/2010 Comments of NORTHWE 10/19/2010 Comments of NORTHWE Inspection Date	Routine/Perio Violations Absent Well Iden in Inspection: ST EUMONT Type Inspection Routine/Perio Violations General Houseke in Inspection: ST EUMONT Type Inspection Routine/Perio Violations Absent Well Iden in Inspection: ST EUMONT Type Inspection	dic tification Signs (R No well Sign (I <b>'UNIT No.166</b> dic eping (Rule 114) Well plugged H PUMPING UN <b>'UNIT No.161</b> dic tification Signs (R No well Sign (F <b>UNIT No.155</b>	Mark Whitaker ule 103) Rule 19.15.16.8). NE Inspector Mark Whitaker Pumping unit has no IT FROM LOCATIC Inspector Mark Whitaker ule 103) Rule 19 15 16.8 <i>j</i> . NE	Yes ED TO INST Violation? Yes been remov DN IST NO Violation? Yes ED TO INST Violation?	Non-Compliance? No ALL WELL SIGN. 1 L-34-19S-36E *Significant Non-Compliance? No ed from location NEI FICE. O-34-19S-36E *Significant Non-Compliance? No ALL WELL SIGN. 1 F-34-19S-36E *Significant Non-Compliance?	Action Due By: 11/26/2010 st notice <b>30-025-04111-00</b> Corrective Action Due By: 11/26/2010 ED TO REMOVE <b>30-025-04116-00</b> Corrective Action Due By: 11/26/2010 st notice. <b>30-025-08701-00</b> Corrective Action Due By:	iMAW102924015 -00 Inspection No. iMAW102923670 -00 Inspection No. iMAW102923846 -00 Inspection No.
Date 10/19/2010 Comments of NORTHWE Inspection Date 10/19/2010 Comments of NORTHWE 10/19/2010 Comments of NORTHWE Inspection	Routine/Perio Violations Absent Well Iden in Inspection: ST EUMONT Type Inspection Routine/Perio Violations General Houseke in Inspection: ST EUMONT Type Inspection Routine/Perio Violations Absent Well Iden in Inspection: ST EUMONT Type Inspection Routine/Perio Violations	dic tification Signs (R No well Sign (I <b>'UNIT No.166</b> dic eping (Rule 114) Well plugged H PUMPING UN <b>'UNIT No.161</b> dic tification Signs (R No well Sign (F <b>UNIT No.155</b>	Mark Whitaker ule 103) Rule 19.15.16.8). NE Inspector Mark Whitaker Pumping unit has no IT FROM LOCATIO Inspector Mark Whitaker ule 103) Rule 19 15 16.8). NE Inspector Mark Whitaker	Yes ED TO INST Violation? Yes been remov DN_IST NO Violation? Yes ED TO INST	Non-Compliance? No ALL WELL SIGN. 1 L-34-19S-36E *Significant Non-Compliance? No ed from location NEI FICE. O-34-19S-36E *Significant Non-Compliance? No ALL WELL SIGN. 1 F-34-19S-36E *Significant	Action Due By: 11/26/2010 st notice <b>30-025-04111-00</b> Corrective Action Due By: 11/26/2010 ED TO REMOVE <b>30-025-04116-00</b> Corrective Action Due By: 11/26/2010 st notice. <b>30-025-08701-00</b> - Corrective	iMAW102924015 -00 Inspection No. iMAW102923670 -00 Inspection No. iMAW1029238463

Oil Conservation Division 1625 N French Drive Hobbs, New Mexico 88240 Phone. 575-393-6161 \* Fax 575-393-0720 \* http://www.emnrd.state.nm.us

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 <sup>2</sup> 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



RHOMBUS OPERATING CO LTD P O BOX 8316 MIDLAND, TX 79708-8316

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