## State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

**Ken McQueen**Cabinet Secretary

Matthias Sayer
Deputy Cabinet Secretary

David Catanach
Division Director

Division Director



### \*Response Required - Deadline Enclosed\*

Underground Injection Control Program
"Protecting Our Underground Sources of Drinking Water"

07-Nov-17

### **CAMBRIAN MANAGEMENT LTD**

PO BOX 272 MIDLAND TX 79702-0272

# 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

KE No.00	1		30-015-21499-00-00
	Active Salt Water Disposal We	ell	C-22-24S-28E
10/25/2017	Permitted Injection PSI:	Actual PSI:	
Annual IMIT	Test Result: F	Repair Due:	1/28/2018
Bradenhead Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:	
MIT: Blow from casing valve	down to zero. Tubing pressure pinned out 2	2000 psi guage.	
WD No.001			30-015-23728-00-00
	Active Salt Water Disposal We	ell	H-27-25S-28E
11/3/2017	Permitted Injection PSI:	Actual PSI:	600
Annual IMIT	Test Result: F	Repair Due:	2/6/2018
		FAIL CAUSE:	
•	10/25/2017 Annual IMIT Bradenhead Test MIT: Blow from casing valve WD No.001	Active Salt Water Disposal We 10/25/2017 Permitted Injection PSI: Annual IMIT Test Result: F Bradenhead Test FAIL TYPE: Other Internal Failure MIT: Blow from casing valve down to zero. Tubing pressure pinned out 2 WD No.001  Active Salt Water Disposal We 11/3/2017 Permitted Injection PSI:	Active Salt Water Disposal Well  10/25/2017 Permitted Injection PSI: Actual PSI:  Annual IMIT Test Result: F Repair Due:  Bradenhead Test FAIL TYPE: Other Internal Failure FAIL CAUSE:  MIT: Blow from casing valve down to zero. Tubing pressure pinned out 2000 psi guage.  WD No.001  Active Salt Water Disposal Well  11/3/2017 Permitted Injection PSI: Actual PSI:

### **DELAWARE RIVER No.002**

30-015-24784-00-00

Active Salt Water Disposal Well

E-11-26S-28E

2/6/2018

**Test Date:** 11/3/2017

**Permitted Injection PSI:** 

**Actual PSI:** 

Test Reason:

Annual IMIT

Test Result:

F

Repair Due:

Test Type: Bradenhead Test FAIL TY

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: Reports casing leak. Will blow down fluid but does not stop flowing. Close valve and pressure builds back

up.

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.

Sincerely,

Artesia OCD District Office

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.