30.015.02961

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson Governor

Joanna Prukop Cabinet Secretary Reese Fullerton Deputy Cabinet Secretary Mark Fesmire Division Director Oil Conservation Division



Response Required – Deadline Enclosed

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

11-Mar-10

TANDEM ENERGY CORPORATION 11490 WESTHEIMER RD, STE 1000 HOUSTON, TX 77077



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

SOUTH LUCKY LAKE QUEEN UNIT No.001C 30-005-60303-00-00 Active Injection - (All Types) E-27-15S-29E 3/10/2010 **Permitted Injection PSI:** Test Date: **Actual PSI:** Test Reason: 5-year Test **Test Result:** F **Repair Due:** 6/13/2010 Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure **Test Type:** FAIL CAUSE: Comments on MIT: Well will not hold pressure. SOUTH LUCKY LAKE QUEEN UNIT No.004 30-005-60381-00-00 Active Injection - (All Types) N-22-15S-29E 3/10/2010 **Test Date: Permitted Injection PSI: Actual PSI:** Test Reason: 5-year Test **Test Result:** F 6/13/2010 **Repair Due:** Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure Test Type: FAIL CAUSE: Comments on MIT: Injection fluid leaking from surface valve. SQUARE LAKE 12 UNIT No.102 30-015-02837-00-00 Active Injection - (All Types) P-1-17S-29E 3/10/2010 **Test Date: Permitted Injection PSI:** Actual PSI: Test Reason: Annual IMIT Test Result: F **Repair Due:** 6/13/2010 **Bradenhead Test** FAIL TYPE: Other Internal Failure **Test Type:** FAIL CAUSE: Comments on MIT: Well would not pressure-up.

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SQUARE LAKE 12 UNIT No.115

		Active Injection - (All Types)		L-12-17S-29E
Test Date:	3/10/2010	Permitted Injection PSI:	Actual PSI:	
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	6/13/2010
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:	
Comments on	MIT: Well will not hold press	sure		
SQUARE LA	KE 12 UNIT No.113			30-015-02962-00-00
		Active Injection - (All Types)		J-12-17S-29E
Test Date:	3/10/2010	Permitted Injection PSI:	Actual PSI:	
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	6/13/2010
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:	
Comments on]	MIT: Well will not hold press	ure		
SQUARE LAK	KE 12 UNIT No.117			30-015-02964-00-00
·		Active Injection - (All Types)		N-12-17S-29E
Test Date:	3/10/2010	Permitted Injection PSI:	Actual PSI:	
Test Reason:	5-year Test	Test Result: F	Repair Due:	6/13/2010
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:	
Comments on M	MIT: Well will not hold press	ure		,
OLD LOCO U	NIT No.015			30-015-03214-00-00
		Active Injection - (All Types)		O-32-17S-29E

30-015-02961-00-00

1100

6/12/2010

6/13/2010

6/13/2010

6/12/2010

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30-015-10453-00-00

O-34-18S-29E

30-015-10472-00-00

N-34-18S-29E

30-015-24267-00-00 F-8-18S-29E

		Active Injection - (All Types)	
Test Date:	3/9/2010	Permitted Injection PSI:	Actual PSI:
Test Reason:	5-year Test	Test Result: F	Repair Due:
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:
Comments on	MIT: Well will not hold press	sure	

BRAINARD No.008

		Active Injection - (All Types)	
Test Date:	3/10/2010	Permitted Injection PSI:	Actual PSI:
Test Reason:	Annual IMIT	Test Result: F	Repair Due:
Test Type:	Bradenhead Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:
Comments on l	MIT: Operator reported hol	e in casing.	

BRAINARD No.007

		Active Injection - (All Types)	
Test Date:	3/10/2010	Permitted Injection PSI:	Actual PSI:
Test Reason:	Annual IMIT	Test Result: F	Repair Due:
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:
Comments on	MIT: Well will not hold press	ure	

BALLARD GRAYBURG SAN ANDRES UNIT No.008J

	Active Injection - (All Types)		
Test Date:	3/9/2010	Permitted Injection PSI:	Actual PSI:
Test Reason:	5-year Test	Test Result: F	Repair Due:
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:
Comments on	MIT: Well will not hold press	sure	

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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. Such a hearing may result in imposition of CIVIL PENALTIES for your violation of OCD rules.

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.