

Krysten Moore <krysten@advancedwirelessllc.com>

Notice of Violation

1 message

Krysten Moore <krysten@advancedwirelessllc.com> To: "Kuehling, Monica, EMNRD" <monica.kuehling@state.nm.us> 30-045.24242

Good afternoon, Monica

We received the Notice of Violation dated 2/24/2020 in today's mail, 2/27/2020. The Notice requests a written confirmation by end of day today. I hope that this email will suffice to meet the requested deadline.

January 14, 2020 we received a call that the high discharge kill on the pump was incorrectly set to 980 psi instead of 890 psi. The kill was adjusted back to 890 psi that day. We found that a new employee had misunderstood what the set point was to be. The cause of this violation was human error and miscommunication.

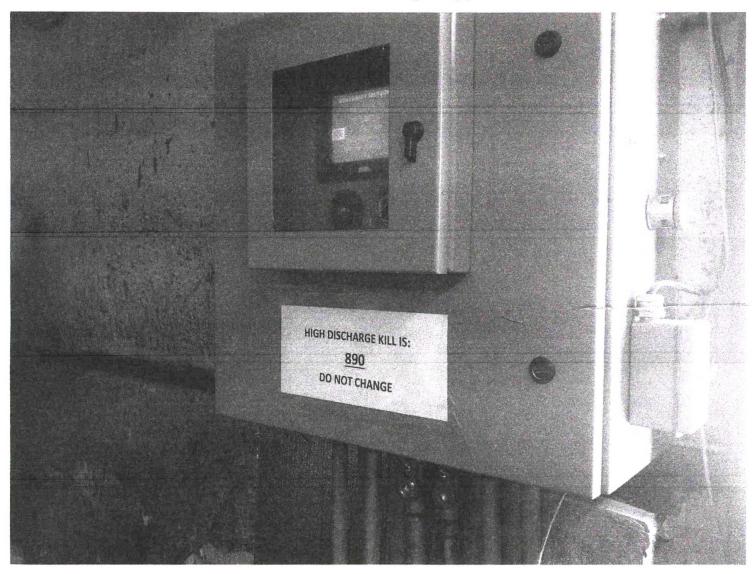
To combat this and prevent it from happening again we have made sure to educate all personnel on the proper discharge kill/pressure limiting device set point and have also posted the correct pressure limit at the facility, see attached.

The pressure limiting device was reset to 890 psi on 1/14/2020, the date of violation. All personnel were refreshed and sign posted shortly thereafter.

Thank you for your attention to this matter,

Krysten Moore Vice President Advanced Wireless Communications, LLC Cell: 505-486-0045 krysten@advancedwirelesslic.com





State of New Mexico Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham Governor

Sarah Cottrell Propst Cabinet Secretary

Todd E. Leahy, JD, PhD Deputy Cabinet Secretary Adrienne Sandoval, Division Director Oil Conservation Division



BY ELECTRONIC AND FIRST-CLASS MAIL

February 24, 2020

RECEIVED FEB 2 7 2020

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NOTICE OF VIOLATION

The Oil Conservation Division (OCD) has determined that Advanced Wireless Communication L.L.C violated and continues to violate Administrative Order SWD-698 ("Order"), issued on April 14, 1998, and amended by letter dated June 9, 1998 ("Amendment").

The Order states:

The injection well or system shall be equipped with a pressure limiting device which will limit the wellhead pressure on the injection well to no more than 892 psi.

The Amendment increased the allowed wellhead pressure to 940 psi.

During an inspection on June 14, 2019, OCD observed that the pressure limiting device was set for 999 psi.

During an inspection on January 14, 2020, OCD observed that the pressure limiting device was set for 980 psi.

Advanced Wireless Communication must set the pressure limiting device correctly and provide written confirmation to OCD no later than the close of business on Thursday, February 27, 2020.

OCD may enforce the Order, as amended, by seeking a sanction, including suspension or cancellation of the authorization for the injection well, pursuant to 19.15.5.10(B) NMAC.

For more information, please contact me at (505) 334-6178, ext. 123 or Monica. Kuehling@state.nm.us.

Regards.

cc:

Monica Kuehling

Deputy Oil and Gas Inspector

NMOCD

MAR 1 2 2020

DISTRICT III

Eric Ames, Office of General Counsel