

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

David Martin
Cabinet Secretary

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

Jami Bailey, Division Director
Oil Conservation Division



Response Required - Deadline Enclosed

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

30-Sep-14

AVRA OIL CO
4925 GREENVILLE AVE. STE. 460
DALLAS TX 75206-

**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

CHARLCIA A TAYLOR No.001

30-025-07329-00-00

Active Salt Water Disposal Well

I-11-18S-38E

Test Date:	9/30/2014	Permitted Injection PSI:	Actual PSI:
Test Reason:	5-year Test	Test Result:	Repair Due:
Test Type:	Std. Annulus Pres. Test	FAIL TYPE:	FAIL CAUSE:

Comments on MIT: TMIT test was scheduled for September 29, 2014. George Bower, with OCD west to location for 3 different testing times, no one showed up to perform the test. Deemed a failure. On September 30, 2014, I contacted Mitch by phone to inform him the SWD well needs to be shut in this morning until it passes the required MIT test. While at the well I observed that the injection pressure is above the permitted pressure of 2100#. I called Mitch and requestec the well be shut in immediately, the MIT test be performed, and a 3000# gauge be installed at the SWD well head to allow pressure monitoring:

SEP 30 2014

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,

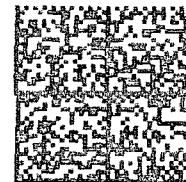
Bel Semanah
Staff Manager

Hobbs 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.

EMNRD
OIL CONSERVATION DIVISION
1625 N FRENCH DRIVE
HOBBS NM 88240

Avra Oil Co
4925 Greenville Ave, Ste 460
Dallas, Texas 75206
Attn: Saeed Afghahi



HASLER	015H14150977	US POSTAGE
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	09/30/14	
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