State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

Ken McQueen

Cabinet Secretary

Matthias Saver

Deputy Cabinet Secretary

David Catanach Division Director



Response Required - Deadline Enclosed

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

08-Sep-17

RHOMBUS OPERATING CO LTD

P.O. Box 627

Littleton CO 80160-0627

LETTER OF VIOLATION and SHUT-IN DIRECTIVE **Failed Mechanical Integrity Test**

Dear Operator:

Test Date:

Test Type:

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

NORTHWEST EUMONT UNIT No.146

30-025-04089-00-00

FAIL CAUSE:

Active Injection - (All Types)

Permitted Injection PSI: **Actual PSI:** 9/8/2017

Test Result: Repair Due: Test Reason: 5-year Test 12/12/2017

FAIL TYPE: Other Internal Failure Test Type: Std. Annulus Pres. Test FAIL CAUSE:

OPERATOR REPORTED MIT-FAILURE. RULE:19.15.26.11. FAILURE FROM 11/28/17 Comments on MIT:

NORTHWEST EUMONT UNIT No.158

Std. Annulus Pres. Test

30-025-04097-00-00

O-27-19S-36E

I-33-19S-36E

Active Injection - (All Types) Actual PSI: Permitted Injection PSI:

Test Date: 9/8/2017 **Test Result:** Test Reason:

5-year Test Repair Due: 12/12/2017 FAIL TYPE: Other Internal Failure

OPERATOR REPORTED MIT-FAILURE. RULE: 19.15.26.11. FAILURE FROM 11/28/15 Comments on MIT:

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

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



FIRST-CLASS MA

\$000.46⁹

09/08/2017 ZIP 882 012E14642224

RHOMBUS OPERATING CO LTD P.O. Box 627 Littleton CO. 80160-0627