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

Susana Martinez

Governor

John H. Bemis 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

22-Mar-13

HOBBS OCD

LINN OPERATING, INC. 600 TRAVIS SUITE 5100 HOUSTON TX 77002MAR 2 5 2013

RECEIVED

ATTN: REGULATORY MANAGER

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

## **CAPROCK MALJAMAR UNIT No.011**

30-025-01445-00-00

Test Date: 3/12/2013 Active Injection - (All Types)

G-17-17S-33E

Test Reason:

**Annual IMIT** 

Permitted Injection PSI:

**Test Result:** 

Actual PSI:

Repair Due: 6/15/2013

Test Type:

FAIL TYPE: Other Internal Failure

Bradenhead Test

FAIL CAUSE:

Comments on MIT:

BHT FAILURE;8 5/8 CASING HAS 30#; FLUID WOULD NOT BLEED DOWN; \*\*\*OPERATOR

IN VIOLATION OF NMOCD RULE 19.15.26.11\*\*\*

30-025-01478-00-00 A-19-17S-33E

Test Date:

3/12/2013

**CAPROCK MALJAMAR UNIT No.040** 

Permitted Injection PSI:

Actual PSI:

Repair Due: 6/15/2013

Test Reason: Test Type:

**Annual IMIT** Bradenhead Test **Test Result:** 

Comments on MIT:

FAIL TYPE: Operational Violation

FAIL CAUSE:

OVER PRESSURE LIMIT; APPROVED PRESSURE LIMIT IS 2200#: OPERATOR STATES

2250# ON BHT SURVEY\*\*\*\*OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.10

Active Injection - (All Types)

(OPERATION & MAINTENANCE)\*\*\*\*

#### **CAPROCK MALJAMAR UNIT No.041**

30-025-01503-00-00

Active Injection - (All Types)

Test Date:

3/12/2013

Permitted Injection PSI:

**Actual PSI:** 

D-20-17S-33E

6/15/2013

Test Reason:

Annual IMIT

**Test Result:** 

Repair Due:

Test Type:

Bradenhead Test

FAIL CAUSE:

FAIL TYPE: Operational Violation

Comments on MIT: OVER PRESSURE LIMIT; APPROVED PRESSURE LIMIT IS 2168#:OPERATOR STATES ON

BHT SURVEY 2200# \*\*\*\*OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.10

(OPERATION & MAINTENANCE)\*\*\*\*

#### MALJAMAR GRAYBURG UNIT No.155

30-025-33874-00-00

Active Injection - (All Types)

F-10-17S-32E

Test Date: Test Reason: 3/12/2013

**Permitted Injection PSI:** 

**Actual PSI:** 

6/15/2013

5-year Test

**Test Result:** 

Repair Due:

Test Type:

Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

**FAIL CAUSE:** 

Comments on MIT:

FAILED PT; DURING PRESSURE TEST WELL LOST MORE THAN 10% ALLOWED;

\*\*\*OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11\*\*\*\*

#### EAST HOBBS SAN ANDRES UNIT No.999

30-025-39209-00-00

6/16/2013

Active Injection - (All Types)

A-31-18S-39E

Test Date:

3/13/2013

Permitted Injection PSI:

**Actual PSI:** 

Repair Due:

Test Reason: Test Type:

5-year Test

**Test Result:** 

FAIL CAUSE:

Comments on MIT:

Std. Annulus Pres. Test

FAIL TYPE: Operational Violation

OVER PRESSURE LIMIT; OPERATOR REPORTED 1200 PSI; APPROVED PRESSURE LIMIT IS 890#\*\*\*OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.10\*\*\*

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.

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



015H14150977

SOLUTION

03/25/13

Mailed From 88240

LINN OPERATING INC. ATTN: REGULATORY MANAGER 600 TRAVIS, STE. 5100 HOUSTON, TX 77002