

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

Ken McQueen
Cabinet Secretary

Matthias Sayer
Deputy Cabinet Secretary

Heather Riley
Division Director



Response Required - Deadline Enclosed

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

29-Jun-18

EOR OPERATING COMPANY
777 N. Eldridge Pkwy Suite 150
Houston TX 77079-7079

**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

MILNESAND UNIT No.036

30-041-00087-00-00
N-18-8S-35E

Expired TA Injection - (All Types)		
Test Date: 6/27/2018	Permitted Injection PSI:	Actual PSI:
Test Reason: Annual IMIT	Test Result: F	Repair Due: 9/30/2018
Test Type: Bradenhead Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:
Comments on MIT: BHT-FAILURE. HAS NOT BEEN REPAIRED SINCE FAILURE 3/1/2017. RULE:19.15.26.11		

MILNESAND UNIT No.182

30-041-00131-00-00
D-18-8S-35E

Active Injection - (All Types)		
Test Date: 6/27/2018	Permitted Injection PSI:	Actual PSI:
Test Reason: Annual IMIT	Test Result: F	Repair Due: 9/30/2018
Test Type: Bradenhead Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:
Comments on MIT: BHT-FAILURE. RULE:19.15.26.11		

Active Injection - (All Types)

F-30-8S-35E

Test Date:	6/27/2018	Permitted Injection PSI:	Actual PSI:
Test Reason:	Annual IMIT	Test Result:	F
Test Type:	Bradenhead Test	FAIL TYPE:	Other Internal Failure
Comments on MIT:	MIT-FAILURE. RULE:19.15.26.11. WELL HAS NOT BEEN REPAIRED SINCE FAILURE-3/1/2017		

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.

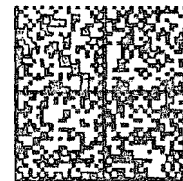
Sincerely,



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**



HASLER

FIRST-CLASS MAIL

\$000.47⁰

06/29/2018 ZIP 88240
012E14642224

US POSTAGE

EOR OPERATING COMPANY
777 N. Eldridge Pkwy Suite 150
Houston TX 77079-7079