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"

31-Aug-18

COG OPERATING LLC

One Concho Center 600 W. Illinois Ave Midland TX 79701-9701

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

FEDERAL 19 No.001 30-025-24676-00-00 Active Salt Water Disposal Well A-19-23S-34E **Actual PSI:** Test Date: **Permitted Injection PSI:** 8/29/2018 Test Result: Test Reason: **Annual IMIT** Repair Due: 12/2/2018 FAIL TYPE: Other Internal Failure Test Type: **Bradenhead Test FAIL CAUSE:** Comments on MIT: 8-29-2018 JOSH MCMILLEN CONCEEDED FAILURE, RULE: 19,15.26.11 **NEW MEXICO EF STATE No.003** 30-025-28697-00-00 Active Injection - (All Types) M-17-23S-33E **Actual PSI:** Test Date: 8/29/2018 **Permitted Injection PSI: Test Result:** Test Reason: Annual IMIT Repair Due: 12/2/2018 Test Type: **Bradenhead Test** FAIL TYPE: Other Internal Failure **FAIL CAUSE:** Comments on MIT: 8-29-2018 JOSH MCMILLEN CONCEEDED FAILURE, RULE: 19.15.26.11

GUNNER 16 STATE SWD No.001

30-025-40890-00-00

12/2/2018

12/2/2018

Active Salt Water Disposal Well

D-16-26S-34E

Test Date:

8/29/2018

Permitted Injection PSI:

DROPED, PRES UP ON PROD CSG & TBG PRES STARTED TO RISE

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

Test Type:

FAIL TYPE: Other Internal Failure

Comments on MIT:

Std. Annulus Pres. Test

FAIL CAUSE:

WELL DISCONNECTED, FAILED MIT, RULE: 19.15.26.11, BLED DOWN PROD CSG & TBG PRES

PINTAIL 3 FEDERAL SWD No.001

Active Salt Water Disposal Well

30-025-41208-00-00 J-3-26S-32E

Test Date:

8/29/2018

Permitted Injection PSI:

Actual PSI:

Test Reason:

Test Result: F Repair Due:

Test Type:

Annual IMIT **Bradenhead Test**

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT:

8-29-2018 JOSH MCMILLEN CONCEEDED FAILURE, RULE: 19.15.26.11

GOLD COAST 26 FEDERAL SWD

No.001 Active Salt Water Disposal Well 30-025-41570-00-00

K-26-24S-32E

Test Date:

8/29/2018

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

12/2/2018

Test Type:

Bradenhead Test

Lary Kolinson

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT:

8-29-2018 JOSH MCMILLEN CONCEEDED FAILURE, RULE: 19.15.26.11

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.

sandlot

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.

US POSTAGE

EMNRD
OIL CONSERVATION DIVISION
1625 N FRENCH DRIVE
HOBBS NM 88240



HASLER FIRST-CLASS MAIL

\$000.47^o

08/31/2018 ZIP 882 012E14642224

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