State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

HOBBS OCD

John H. Bemis Cabinet Secretary MAR 18 2013

Jami Bailey, Division Director Oil Conservation Division

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

RECEIVED



Response Required - Deadline Enclosed

Underground Injection Control Program "Protecting Our Underground Sources of Drinking

18-Mar-13

ConocoPhillips Co ATTN: SUSAN MAUNDER P O Box 51810 Midland, TX 79710

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

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

MCA UNIT No.074

Active Injection - (All Types)

30-025-00627-00-00 J-22-17S-32E

Test Date:

3/7/2013

Permitted Injection PSI:

Actual PSI:

Test Reason:

5-year Test

Test Result:

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

6/10/2013 Repair Due:

Comments on MIT:

OPERATOR STATES THAT WELL FAILED MIT PT PER BRADENHEAD SURVEY APRVD

3/13/2013; ***OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11***

MCA UNIT No.171

Active Injection - (All Types)

30-025-00764-00-00 J-29-17S-32E

6/9/2013

Test Date: Test Reason: 3/6/2013

Permitted Injection PSI:

Actual PSI:

Test Type:

5-year Test

Test Result:

Repair Due:

Comments on MIT:

Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

PER OPERATOR WELL FAILED MIT PT AS NOTED ON BHT SURVEY SHEET APRVD

3/13/2013***OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11***

VACUUM GLORIETA EAST UNIT No.003

30-025-20785-00-00

Active Oil (Producing)

A-33-17S-35E

Test Date:

3/15/2013

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

6/18/2013

Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT:

MCA UNIT No.485

PER NOI C103 APPROVED 3/12/2013; ***OPERATOR STATES WELL FAILED

BRADENHEAD TEST***OPERATOR WILL ISOLATE LEAK FOUND DURING BRADENHEAD

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

30-025-39403-00-00 K-28-17S-32E

Test Date:

Active Injection - (All Types)

Actual PSI:

Test Reason:

2/12/2013

Permitted Injection PSI:

Repair Due:

5/18/2013

Test Type:

Annual IMIT

Test Result: F

FAIL CAUSE:

Comments on MIT:

Bradenhead Test

FAIL TYPE: Other Internal Failure OPERATOR STATES WELL FAILED MIT FAILURE 2/19/2013 PER NOI (BLM) SUNDRY

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

APRVD FOR RECORD 3/11/2013; ***OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11***

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 Détail 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 \$0.46 \$0.46 03/18/13 Mailed From 88240

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