State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

David Martin Cabinet Secretary

Brett F. Woods, Ph.D. **Deputy Cabinet Secretary** Jami Bailey, Division Director Oil Conservation Division



17-Sep-14

CHEVRON USA INC ATTN: SANDY STEDMAN-DANIEL 1400 SMITH HOUSTON TX 77002-

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

VACUUM GRAYBURG SAN ANDRES UNIT No.439

30-025-38786-00-00 B-1-18S-34E

Active Injection - (All Types)

5/5/2014 Test Reason: Annual IMIT Permitted Injection PSI:

Actual PSI:

Test Type:

Test Result:

8/8/2014 Repair Due:

Bradenhead Test FAIL TYPE: Other Internal Failure

Comments on MIT:

Test Date:

FAIL CAUSE:

OPERATOR STATES CASING WOULD NOT BLEED DOWN CO2. ***FAILED BRADENHEAD

TEST 5/5/2014*** OPERATOR HAS NOT SUBMITTED NOI C103 TO REPAIR WELL****

OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11*

CENTRAL VACUUM UNIT No.455

30-025-38637-00-00

Active Injection - (All Types)

D-36-17S-34E

Test Date:

8/19/2014

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

Test Type:

Bradenhead Test

11/22/2014

FAIL TYPE: Other Internal Failure

Comments on MIT:

FAILED BHT 08/19/2014 ***OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11***

FAIL CAUSE:

WELL SHOWS 1350# ON CASING AND 1450# ON INTERMEDIATE CASING.

CENTRAL VACUUM UNIT No.459

30-025-38641-00-00

Active Injection - (All Types)

D-31-17S-35E

Test Date:

8/19/2014

Permitted Injection PSI:

Actual PSI: Repair Due:

Test Reason:

Annual IMIT

Test Result:

11/22/2014

Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

FAILED BHT 08/19/2014; ***OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11*** Comments on MIT:

PRODUCTION CASING SHOWS #1200***

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.

Hobbs OCD District Office

COMPLIANCE OFFICERNote: 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



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