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

Susana Martinez Governor

**Tony Delfin** 

Acting Cabinet Secretary

David R. Catanach, Division Director

Oil Conservation Division



## \*Response Required - Deadline Enclosed\*

Underground Injection Control Program

HOBBS OCD

"Protecting Our Underground Sources of Drinking Water"

NOV 2 8 2016

28-Nov-16

RHOMBUS OPERATING CO LTD

P.O. BOX 627 LITTLETON CO 80160-0627 RECEIVED

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

## NORTHWEST EUMONT UNIT No.146

30-025-04089-00-00

O-27-19S-36E

Active Injection - (All Types)

Actual PSI:

**Test Date:** 11/28/2016 Test Reason: Annual IMIT Permitted Injection PSI:

**Test Result:** 

Repair Due: 3/3/2017

Test Type:

Comments on MIT:

Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

OPERATOR REPORTED WELL HAS NOT BEEN REPAIRED SINCE FAILURE 6/12/2012. RULE:

19.15.26.11. 2ND NOTICE

30-025-04097-00-00

NORTHWEST EUMONT UNIT No.158

Active Injection - (All Types)

I-33-19S-36E

**Test Date:** 

11/28/2016

Permitted Injection PSI:

**Actual PSI:** 

3/3/2017

Test Reason:

Annual IMIT

**Test Result:** 

Repair Due:

Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

**FAIL CAUSE:** 

Comments on MIT:

OPERATOR REPORTED BHT-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.

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.

**HOBBS NM 88240 1625 N FRENCH DRIVE OIL CONSERVATION DIVISION** EMNRD

P.O. BOX 627 RHOMBUS OPERATING CO LTD **LITTLETON CO 80160-0627** 



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