State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

Ken McQueen

Cabinet Secretary

Matthias Sayer

Deputy Cabinet Secretary

David Catanach

Division Director



Response Required - Deadline Enclosed

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

08-Sep-17

CANO PETRO OF NEW MEXICO, INC.

P O Box 4470

Tulsa OK 74159-4159

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

CATO SAN A	30-005-10572-00-00			
		Active Injection - (All Types)		A-14-8S-30E
Test Date:	9/6/2017	Permitted Injection PSI:	Actual PSI:	
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	12/10/2017
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:	
Comments on 1	MIT: OPER. REPORTED MI	T FALED RULE: 19.15.26.11. FAILURE F	ROM 2016	
CATO SAN A	30-005-20067-00-00			
		Active Injection - (All Types)		A-9-8S-30E
Test Date:	9/6/2017	Permitted Injection PSI:	Actual PSI:	
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	12/10/2017
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:	
Comments on 1	MIT: OPER. REPORTED MI	T FALED RULE: 19.15.26.11. FAILURE F	ROM 2011	

CATO SAN AI	NDRES UNIT No.171			30-005-20165-00-00		
OTAL O DIAL (TA		Active Injection - (All Types)		G-33-8S-30E		
Test Date:	9/6/2017	Permitted Injection PSI:	Actual PSI:	0 00 00 002		
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	12/10/2017		
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:			
Comments on I	MIT: OPER. REPORTED MIT	FALED RULE: 19.15.26.11. FAILURE FR	OM 2016			
CATO SAN AI	30-005-20169-00-00					
		Active Injection - (All Types)		O-33-8S-30E		
Test Date:	9/6/2017	Permitted Injection PSI:	Actual PSI:			
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	12/10/2017		
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:			
Comments on I	MIT: OPER. REPORTED MIT	FAILED RULE: 19.15.26.11. FAILURE FR	OM 2016			
CATO SAN AI	30-005-20177-00-00					
		Active Injection - (All Types)		E-33-8S-30E		
Test Date:	9/6/2017	Permitted Injection PSI:	Actual PSI:			
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	12/10/2017		
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:			
Comments on MIT: OPER. REPORTED MIT FALED RULE: 19.15.26.11. FAILURE FROM 2016						
CATO SAN AI	30-005-20178-00-00					
		Active Injection - (All Types)		M-33-8S-30E		
Test Date:	9/6/2017	Permitted Injection PSI:	Actual PSI:			
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	12/10/2017		
Test Reason: Test Type:	Annual IMIT Std. Annulus Pres. Test	Test Result: F FAIL TYPE: Other Internal Failure	Repair Due: FAIL CAUSE:	12/10/2017		
	Std. Annulus Pres. Test		FAIL CAUSE:	12/10/2017		

Active Injection - (All Types)

P-6-9S-30E

Permitted Injection PSI: 9/6/2017

Actual PSI:

Test Result: Repair Due: 12/10/2017

Test Type: Std. Annulus Pres. Test

Annual IMIT

Day Kolinson

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Test Date:

Test Reason:

OPER. REPORTED MIT FAILED RULE: 19.15.26.11. FAILURE FROM 2016

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

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
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CANO PETRO OF NEW MEXICO, INC P.O. BOX 4470 TULSA, OK, 74159-4159