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

HOBBS OCD

Underground Injection Control Program

"Protecting Our Underground Sources of Drinking Water"

JUL 16 2018

16-Jul-18

RECEIVED

RIDGEWAY ARIZONA OIL CORP.

777 N. Eldridge Pkwy Suite 150 Houston TX 77079-7079

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

HALEY CHAVEROO SA UNIT No.033

30-005-10440-00-00

Active Injection - (All Types)

B-3-8S-33E

Test Date:

7/16/2018

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

Test Type:

FAIL TYPE: Other Internal Failure

Bradenhead Test

FAIL CAUSE:

Comments on MIT: MIT-FAILURE. RULE:19.15.26.11. WELL HAS NOT BEEN REPAIRED SINCE FAILURE-2/24/17.

HALEY CHAVEROO SA UNIT No.042

30-005-10551-00-00

10/19/2018

Active Injection - (All Types)

P-3-8S-33E

Test Date: Test Reason:

7/16/2018 Annual IMIT

Permitted Injection PSI: **Test Result:**

Actual PSI:

Repair Due: 10/19/2018

Test Type:

Bradenhead Test

F FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: MIT-FAILURE. RULE: 19.15.26.11. WELL HAS NOT BEEN REPAIRED SINCE FAILURE-2/24/17. HALEY CHAVEROO SA UNIT No.014

30-041-10137-00-00

Active Injection - (All Types)

F-33-7S-33E

Test Date:

7/16/2018

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Test Type:

Repair Due:

Comments on MIT:

F FAIL TYPE: Other Internal Failure

Bradenhead Test

FAIL CAUSE:

MIT-FAILURE. RULE: 19.15.26.11. WELL HAS NOT BEEN REPAIRED SINCE FAILURE-2/24/17.

30-041-10138-00-00

10/19/2018

10/19/2018

HALEY CHAVEROO SA UNIT No.018

Active Injection - (All Types)

J-33-7S-33E

Test Date: Test Reason:

7/16/2018

Permitted Injection PSI:

Actual PSI:

Annual IMIT

Test Result:

Repair Due:

Test Type:

Bradenhead Test

F FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: MIT-FAILURE, RULE: 19.15.26.11, WELL HAS NOT BEEN REPAIRED SINCE FAILURE-2/24/17.

HALEY CHAVEROO SA UNIT No.003

Expired TA Injection - (All Types)

30-041-10144-00-00 B-33-7S-33E

Test Date:

7/16/2018

Permitted Injection PSI:

Actual PSI: Repair Due:

10/19/2018

Test Reason:

Annual IMIT

Test Result:

Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: BHT-FAILURE. RULE:19.15.26.11. WELL HAS NOT BEEN REPAIRED SINCE FAILURE-2/24/17.

HALEY CHAVEROO SA UNIT No.025 30-041-10164-00-00

7/16/2018

Active Injection - (All Types)

N-33-7S-33E

Test Date: Test Reason:

Permitted Injection PSI: **Test Result:**

F

Actual PSI: Repair Due:

10/19/2018

Test Type:

Annual IMIT Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: MIT-FAILURE. RULE: 19.15.26.11. WELL HAS NOT BEEN REPAIRED SINCE FAILURE-2/24/17.

HALEY CHAVEROO SA UNIT No.001

30-041-10174-00-00

10/19/2018

Test Date:

7/16/2018

Active Injection - (All Types) Permitted Injection PSI:

Actual PSI:

D-33-7S-33E

Test Reason:

Test Result:

F

Repair Due:

Test Type:

Annual IMIT Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT:

OPERATOR REPORTED BHT-FAILURE. RULE: 19.15.26.11. HAS NOT BEEN REPAIRED SINCE FAILURE- 2/24/17.

HALEY CHAVEROO SA UNIT No.012

30-041-10213-00-00

L-34-7S-33E

Test Date:

7/16/2018

Expired TA Injection - (All Types) **Permitted Injection PSI:**

Actual PSI:

Test Reason:

Annual IMIT

Repair Due:

Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: MIT-FAILURE. RULE:19.15.26.11. WELL HAS NOT BEEN REPAIRED SINCE FAILURE-2/24/17.

Test Result:

10/19/2018

HALEY CHAVEROO SA UNIT No.005

Active Injection - (All Types)

30-041-10218-00-00 D-34-7S-33E

Test Date: Test Reason: 7/16/2018

Permitted Injection PSI:

Actual PSI: Repair Due:

Test Type:

Annual IMIT

F FAIL TYPE: Other Internal Failure

10/19/2018 FAIL CAUSE:

Bradenhead Test MIT-FAILURE. RULE: 19.15.26.11. WELL HAS NOT BEEN REPAIRED SINCE FAILURE-2/24/17.

Test Result:

Test Result:

30-041-10232-00-00 J-34-7S-33E

Test Date:

Test Reason:

7/16/2018

HALEY CHAVEROO SA UNIT No.022

Expired TA Injection - (All Types) **Permitted Injection PSI:**

Actual PSI:

Repair Due: 10/19/2018

Test Type:

Annual IMIT Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: MIT-FAILURE. RULE: 19.15.26.11. WELL HAS NOT BEEN REPAIRED SINCE FAILURE-2/24/17. HALEY CHAVEROO SA UNIT No.007

30-041-10243-00-00

Active Injection - (All Types)

B-34-7S-33E

Test Date:

7/16/2018

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

10/19/2018

Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

Comments on MIT: MIT-FAILURE. RULE:19.15.26.11. WELL HAS NOT BEEN REPAIRED SINCE FAILURE-2/24/17.

FAIL CAUSE:

HALEY CHAVEROO SA UNIT No.008

Expired TA Injection - (All Types)

30-041-10413-00-00 H-34-7S-33E

Test Date:

7/16/2018

Permitted Injection PSI:

Actual PSI:

10/19/2018

Test Reason: Test Type:

-Annual-IMIT

Test Result: F

Repair Due: FAIL CAUSE:

Bradenhead Test

FAIL TYPE: Other Internal Failure

Comments on MIT: MIT-FAILURE. RULE:19.15.26.11. WELL HAS NOT BEEN REPAIRED SINCE FAILURE-2/24/17.

HALEY CHAVEROO SA UNIT No.031

Active Injection - (All Types)

30-041-10421-00-00 P-34-7S-33E

Test Date: Test Reason:

7/16/2018 Annual IMIT Permitted Injection PSI:

Actual PSI:

Test Type:

Bradenhead Test

Test Result:

Repair Due:

10/19/2018

Comments on MIT:

FAIL TYPE: Other Internal Failure MIT-FAILURE. RULE:19.15.26.11. WELL HAS NOT BEEN REPAIRED SINCE FAILURE-2/24/17.

FAIL CAUSE:

HALEY CHAVEROO SA UNIT No.029

Active Injection - (All Types)

F

30-041-10450-00-00 N-34-7S-33E

Test Date:

7/16/2018

Permitted Injection PSI:

Actual PSI:

Test Reason: Test Type:

Annual IMIT

Test Result:

Repair Due:

10/19/2018

FAIL TYPE: Other Internal Failure Bradenhead Test Comments on MIT: MIT-FAILURE. RULE:19.15.26.11. WELL HAS NOT BEEN REPAIRED SINCE FAILURE-2/24/17.

FAIL CAUSE:

JENNIFER CHAVEROO SA UNIT No.042

30-041-10553-00-00

Test Date:

7/16/2018

Active Injection - (All Types) **Permitted Injection PSI:**

M-25-7S-33E **Actual PSI:**

Test Reason:

Annual IMIT

Test Result: F Repair Due:

10/19/2018

Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

Comments on MIT:

MIT-FAILURE. RULE: 19.15.26.11. WELL HAS NOT BEEN REPAIRED SINCE FAILURE-2/24/17.

FAIL CAUSE:

MIDWEST MORGAN FEDERAL No.001

30-041-10588-00-00 I-13-7S-33E

Test Date:

7/16/2018

Active Salt Water Disposal Well **Permitted Injection PSI:**

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

Test Type: FAIL TYPE: Other Internal Failure Bradenhead Test

10/19/2018

Comments on MIT:

FAIL CAUSE: MIT-FAILURE. RULE:19.15.26.11. WELL HAS NOT BEEN REPAIRED SINCE FAILURE-2/24/17.

JENNIFER CHAVEROO SA UNIT No.072

30-041-10593-00-00 I-25-7S-33E

Test Date:

Active Injection - (All Types) **Permitted Injection PSI:**

Actual PSI:

Test Reason:

7/16/2018 Annual IMIT

Test Result:

Repair Due:

Test Type:

FAIL TYPE: Other Internal Failure

10/19/2018 **FAIL CAUSE:**

Comments on MIT: MIT-FAILURE. RULE:19.15.26.11. WELL HAS NOT BEEN REPAIRED SINCE FAILURE-2/24/17.

Bradenhead Test

JENNIFER CHAVEROO SA UNIT No.053

Active Injection - (All Types)

30-041-20100-00-00 G-36-7S-33E

10/19/2018

Test Date:

7/16/2018

Permitted Injection PSI:

Actual PSI: Repair Due:

Test Reason: Test Type:

Annual IMIT

Test Result:

Bradenhead Test

Comments on MIT:

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

MIT-FAILURE. RULE:19.15.26.11. WELL HAS NOT BEEN REPAIRED SINCE FAILURE-2/24/17.

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.

EMNRD
OIL CONSERVATION DIVISION
1625 N FRENCH DRIVE
HOBBS NM 88240



E HA

ASLER

FIRST-CLASS MAIL

\$000.479

07/16/2018 ZIP 88240 012E14642224

RIDGEWAY ARIZONA OIL CORP. 777 N. Eldridge Pkwy Suite 150 Houston TX 77079-7079