State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

Ken McQueen

Cabinet Secretary

Matthias Saver

Deputy Cabinet Secretary

Heather Riley

Division Director

Response Required - Deadline Enclosed

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

HOBBS OCD

18-Jul-18

CANO PETRO OF NEW MEXICO, INC.

P O Box 4470 Tulsa OK 74159-4159 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

CATO SAN ANDRES UNIT No.081

Active Injection - (All Types)

30-005-10572-00-00 A-14-8S-30E

Test Date:

7/17/2018

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

10/20/2018

10/20/2018

Test Type:

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Bradenhead Test

Comments on MIT: OPER. REPORTED MIT FAILED RULE: 19.15.26.11. FAILURE FROM 2017, STILL NOT REPAIRED

CATO SAN ANDRES UNIT No.171

Active Injection - (All Types)

30-005-20165-00-00 G-33-8S-30E

Test Date: Test Reason: 7/17/2018 **Annual IMIT** **Permitted Injection PSI: Test Result:**

F

Actual PSI: Repair Due:

FAIL TYPE: Other Internal Failure **Test Type: Bradenhead Test**

FAIL CAUSE:

Comments on MIT: OPER. REPORTED MIT FAILED RULE: 19.15.26.11. FAILURE FROM 2017, STILL NOT REPAIRED CATO SAN ANDRES UNIT

No.180

30-005-20169-00-00 O-33-8S-30E

Active Injection - (All Types)

Test Date:

7/17/2018

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

Test Type:

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Bradenhead Test

Comments on MIT: OPER. REPORTED MIT FAILED RULE: 19.15.26.11. FAILURE FROM 2017, STILL NOT REPAIRED

CATO SAN ANDRES UNIT No.172

Active Injection - (All Types)

30-005-20177-00-00 E-33-8S-30E

Test Date: Test Reason: 7/17/2018 **Annual IMIT** Permitted Injection PSI:

Actual PSI:

Repair Due:

10/20/2018

10/20/2018

Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: OPER. REPORTED MIT FAILED RULE: 19.15.26.11. FAILURE FROM 2017, STILL NOT REPAIRED

CATO SAN ANDRES UNIT No.181

Active Injection - (All Types)

30-005-20178-00-00 M-33-8S-30E

Test Date:

7/17/2018

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Test Result:

F

Repair Due:

10/20/2018

Test Type: Comments on MIT:

Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

OPER. REPORTED MIT FAILED RULE: 19.15.26.11. FAILURE FROM 2017, STILL NOT REPAIRED

CATO SAN ANDRES UNIT

No.200

Active Injection - (All Types)

30-005-20529-00-00

Test Date:

7/17/2018 **Annual IMIT** **Permitted Injection PSI:**

Actual PSI:

P-6-9S-30E

Test Result:

Repair Due:

10/20/2018

Test Reason: Test Type:

Bradenhead Test

F FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT:

OPER. REPORTED MIT FAILED RULE: 19.15.26.11. FAILURE FROM 2017, STILL NOT REPAIRED

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. 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.

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Hobbs OCD District Office

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EMNRD
OIL CONSERVATION DIVISION
1625 N FRENCH DRIVE
HOBBS NM 88240



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FIRST-CLASS M

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