State Of New Mexico Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham Governor Sarah Cottrell Propst **Cabinet Secretary** Todd E. Leahy, JD, PhD

Deputy Cabinet Secretary

Adrienne Sandoval **Division Director**



"Response Required - Deadline Enclosed"

Field Inspection Program "Preserving the Integrity of Our Environment"

30-Aug-19

Flint Oak Energy, LLC 1703 Westfield Loop Rd Houston, TX 77073

LETTER OF VIOLATION - Field Inspection

Dear Operator:

The following inspection indicates that the well, equipment, location or operational status of the well failed to meet standards of the New Mexico Oil Conservation Division as described in the detail section below. To comply with standards imposed by Rules and Regulations of the Division, corrective action must be taken immediately and the situation brought into compliance. The detail section indicates preliminary findings and/or probable nature of the violation. This determination is based on an inspection of your well or facility by an inspector employed by the Oil Conservation Division on the date indicated.

Please notify the proper district office of the Division, in writing, of the date corrective actions are scheduled to be made so that arrangements can be made to reinspect the well and/or facility.

INSPECTION DETAIL SECTION

[30-025-01433] SHAHARA STATE UNIT #006

OGRID: 328733

K-16-17S-33E 1960 FSL 1650 FWL

Inspection Date

Type Inspection

Inspector

Corrective Action Due By

Inspection No.

8/30/2019

Routine Inspection

[GR] Gary Robinson

11/28/2019

iGR1924234355

Violations:

Rule

Violation

19.15.26 Injection

Detection of Deficient Mechanical Integrity

Comment:

Operator reported and conceded failure.

19.15 Oil and Gas

Mechanical Integrity Failure Recorded

Comment:

Auto Generated Violation - MIT Failure exits.

In the event that a satisfactory response is not received to this letter of direction by the "Corrective Action Due By;" date shown above, 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: Information in Detail Section comes directly from field inspector data entries - not all blanks will contain data.

Oil Conservation Division * 1625 N. French Drive * Hobbs, NM 88240 Phone: 575-393-6161 * Fax: 575-393-0720 * www.emnrd.state.nm.us

State of New Mexico

Energy, Minerals and Natural Resources Department Oil Conservation Division Hobbs District Office

		BRADENHEAD T	CEST REI	PORT	·				
Elist Don	Operator N	anie			32	F118	*API Numb	432	
FINI UPT	Energy	perty Name			ا ا	-00	•	vell No.	
SPHARA	ST.						#6		
		¹ Surface Lo	cation					:	
UL-Lot Section Township Range		Feet from N/S Line			Feet Fr		E/W Line	County	
1/2 1/2	<u>0 050 </u>	Well Sta	T	٠.	100			1 2 2 3	
TA'D WELL	SHUT-IN	INJECTO	·	. • 1	PRODUCE		T	DATE	
YES NO		NO INJ	SWD	OIL	7	GAS	8-	30-19	
					:				
		<u>OBSERVEI</u>	DATA		:				
	(A)Surface		(C)Inter	(C)Interm(2)		(D)Prod Csng		(E)Tubing	
Pressure		•	 -						
Flow Characteristics	-								
Pun	Y / N	Y / N		Y/N		Y	/ N	CO2	
Steady Flow	Y/N	Y / N		Y / N Y / N Y / N Y / N Y / N		Υ Υ	/ N	WTR	
Surges	YIN	Y/N				 	1 N	GAS	
Down to nothing	YIN	YIN				1	7.8	Injected for	
Gas or Oil	YIN	Y / N				7	Waterfield if applies		
Water	YIN	Y / N				7	/ N		
<u> </u>		- 				:			
Remarks – Please state for ea	A SECTION DESIGNATION					· - ''6' a 1' - a			
Remarks - Please state for ea	icu struš (*77°C'D'F) ber	anent information regardin	ā piesa gowu o	rconunt	ious build u	p ii appues.		:	
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Signature:									
,					OIL CONSERVATION DIVISION				
Printed name:					Entered into RBDMS				
Title:					Re-test			700	
E-mail Address:						:			
Date:	Phone:	1 /1 -							
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PERFORMING BRADENHEAD TEST

General Procedure for Bradenhead Test

Identify: All valves prior to testing

Gauges: Install on each casing string to record pressure.

Assure: That all valves are in good working condition and <u>closed at least 24 hours prior</u> to testing.

Open: Each valve (Bradenhead, intermediate and casing valves) is to be opened

separately.

Check Gauges: Record pressure on each gauge and casing string on BHT form. Open valves to atmosphere and record results on BHT form.

Designate what applies to the result of opening the valves for each string:

Blow or Puff
Bled down to Nothing
Steady Flow
Oil or Gas
Water
Yes or No
Yes or No
Yes or No
Yes or No

Start: Injection or SWD pump so tubing pressure can be read.

Instructions below apply to the District 1 Hobbs office since this must be reported on a form.

In case of pressure:

- 1. Record pressure reading on gauge.
- 2. Bleed and note time elapsed to bleed down.
- 3. Leave valve open for additional observation.
- 4. Note any fluids expelled.

In absence of Pressure:

- 1. Leave valve open for additional observation.
- 2. Note types of fluids expelled.
- 3. Note if fluids persist throughout test.

Note: Tubing pressure on injection or SWD wells.

Test will be signed by person performing test with a contact phone number.

EMNRD OIL CONSERVATION DIVISION 1625 N FRENCH DRIVE HOBBS NM 88240



NEOPOST
FIRST-CLASS MAIL

\$000.50°
08/30/2019 ZIP 88240
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FLINT OAK ENERGY, LLC 1703 WESTFIELD LOOP RD. HOUSTON, TX, 77073