

UIC - 1 - _008_

**NOTICE OF
VIOLATIONS
(NOVs)**

New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

John H. Bemis
Cabinet Secretary-Designate

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

Jami Bailey
Division Director
Oil Conservation Division



OCTOBER 20, 2011

Mr. Darrell Moore
Environmental Manager for Water and Waste
Navajo Refining Company
501 East Main Street, P.O. Drawer 159
Artesia, New Mexico 88211-0159

Via U.S. Certified Mail No.: 7001 1940 0004 7923 1190

Re: **LETTER OF VIOLATION Class I (Non-Hazardous) Injection Well Discharge Permits (UICI-008): Oil Field Waste Disposal Wells, Eddy County, New Mexico [WDW - 1 API# 30-015- 27592; WDW - 2 API# 30-015- 20894; and WDW - 3 API# 30-015-26575]**

Dear Mr. Moore:

The New Mexico Oil Conservation Division (OCD) is writing to inform the Navajo Refining Company (Navajo) that it is in violation of the Underground Injection Control (UIC) Program Annual Mechanical Integrity Test (MIT) requirement for its three injection wells.

Navajo failed to conduct the annual MIT before September 30, 2011, the end of the Federal Environmental Protection Agency (EPA) Fiscal Year 2011 (Oct. 1, 2010 – Sept. 30, 2011). The OCD had sent out an e-mail reminder to operators on June 14, 2011.

The MITs require advanced notification to the OCD in order to witness the MIT; the original MIT pressure chart with signatures and test information that reflects a "pass/fail" on the chart; and a copy of the calibration sheet (every 6 months) from the used chart recorder that is scanned into the OCD well files as confirmation that the MIT requirement has been met.

Please contact Mr. Carl Chavez of my staff at (505) 476-3490 or Carl.Chavez@state.nm.us to schedule MITs for your injection wells to be completed before December 31, 2011. Failure to meet this date may result in escalated enforcement actions. Thank you in advance for your cooperation in this matter

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Sanchez", is written over a faint, dotted signature line.

Daniel Sanchez
UIC Director

Mr. Darrell Moore
Navajo Refining Company
October 20, 2011

DS/cje

Xc: UICI-008 Well File "MITs"
OCD District Office