BW - 9

MECHANICAL INTEGRITY TEST (MITs)

DATE: _____

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Tuesday, June 24, 2008 9:48 AM
To: 'Philliber, Mark'
Cc: Price, Wayne, EMNRD; Patterson, Bob; Molleur, Loren; Blevins, Sam; Price, Wayne, EMNRD; Williams, Chris, EMNRD; Jones, William V., EMNRD
Subject: RE: BW-9 MIT Scheduling FY08

Mark:

Good morning. The OCD will record an MIT Fail on BW-9 for June 4, 2008. This will mark the start of the 90 day corrective action period to be completed by September 4, 2008. If Key Energy Services, LLC is planning to plug and abandon (PA) the well, please submit your C-103 for approval to me and the OCD District Office so we can facilitate approval of the PA for BW-9 before September 4, 2008. The well will need to be PA'd by this date. The standard OCD procedure is to pull tubing (cut if off and abandon in hole), scrape the inner casing, set a bridge plug above the casing shoe, pressure up to test seal, fill casing from bottom to top at sufficient pressure, and set marker per OCD Regs.

Please contact me if you have questions. Thank you.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3491
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us
Website: http://www.emnrd.state.nm.us/ocd/index.htm
(Pollution Prevention Guidance is under "Publications")

From: Philliber, Mark [mailto:mphilliber@keyenergy.com]
Sent: Wednesday, June 04, 2008 11:13 AM
To: Chavez, Carl J, EMNRD
Cc: Price, Wayne, EMNRD; Patterson, Bob; Molleur, Loren; Blevins, Sam
Subject: FW: BW-9 MIT Scheduling FY08

Carl,

We recently attempted to run tubing to TD on this well and were unsuccessful. We believe this well will not successfully pass an MIT and have begun preparing a request for NMOCD's approval to plug this well.

Thank you,

Mark Philliber
SWD Compliance Coordinator
Key Energy Services, Inc.
6 Desta Drive, Suite 4400
Midland, Texas 79705
(432) 571-7203 Office
(432) 770-5064 Cell

Sam Blevins
District Manager
Yard 407
Eunice, NM
(505)394-2581
-----Original Message-----
From: Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]
Sent: Wednesday, May 21, 2008 9:36 AM
To: Blevins, Sam
Cc: Patterson, Bob; Price, Wayne, EMNRD
Subject: BW-9 MIT Scheduling FY08

Sam:

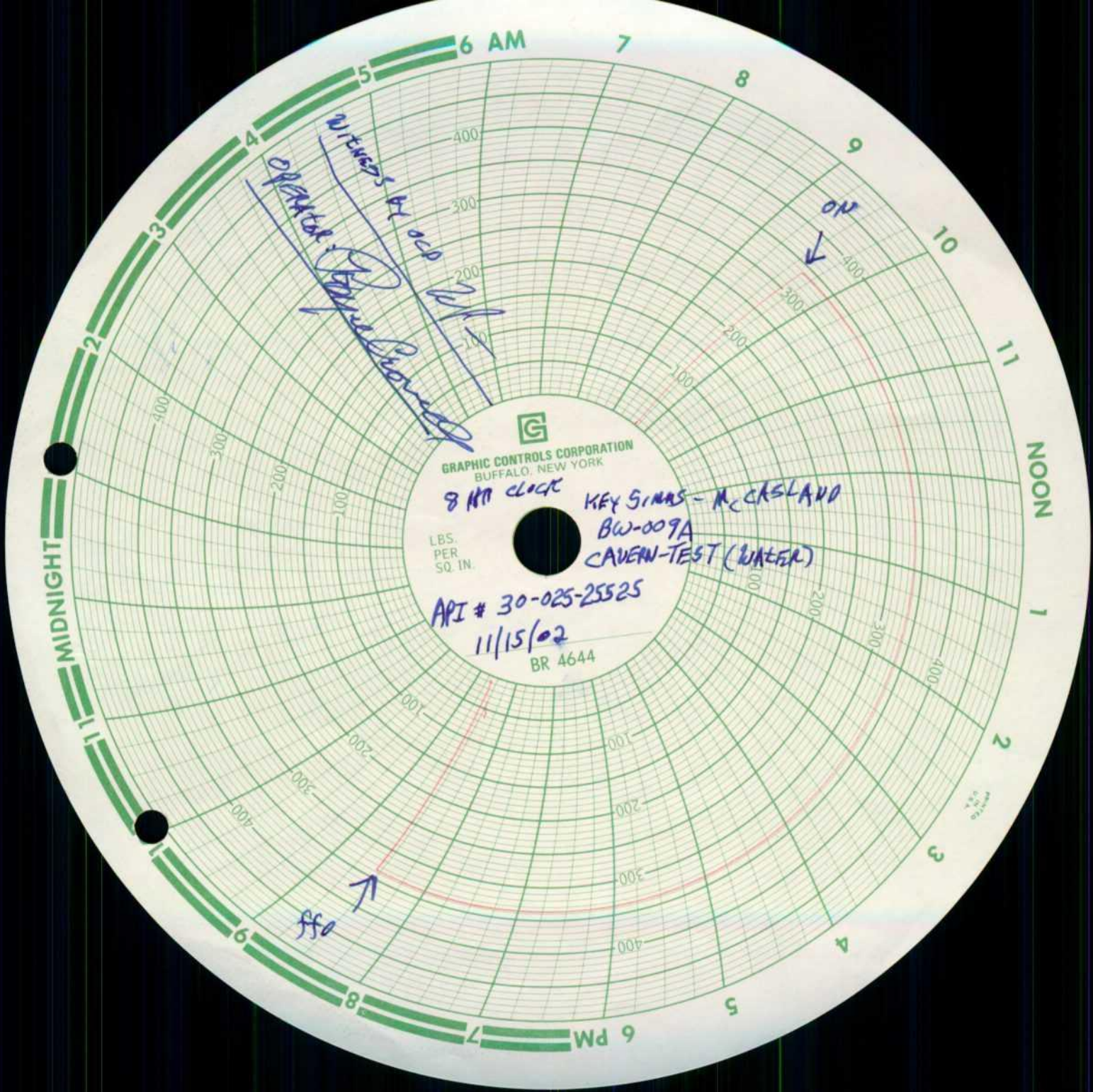
Please find below the MIT schedule for Key Energy Services LLC's BW-9. An MIT is required to be performed before Monday, June 26, 2008 (end of FY08 EPA Reporting Period).

SIMS-MCCASLAND BRINE -EUNICE (GP-Sims #2)	BW-9	30-025-25525	N 32.44152 W103.17691	(UL-A)32-21S-37E	Lea	04/06/2009	A

Please contact me to provide a date, time and type of MIT that Key is required to perform this fiscal year.

Thank you.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3491
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us
Website: http://www.emnrd.state.nm.us/ocd/index.htm
(Pollution Prevention Guidance is under "Publications")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GRAPHIC CONTROLS CORPORATION
BUFFALO, NEW YORK
LBS. PER SQ. IN.
8 HR CLOCK
KEY SIMMS - McCASLAND
BW-009A
CAVEIN-TEST (WATER)
API # 30-025-25525
11/15/02
BR 4644
WITNESS BY OCD
OPERATOR

BW-09A
GRAPHIC CONTROLS CORPORATION
BUFFALO, NEW YORK
LBS. PER SQ. IN.
API 30-025-25525
KEY ENERGY
GP-SIMS WELL #2
A-32-21S-34E
CASING + FORMATION (OPEN HOLE)
WATER
11/29/01 19
BR 4644
API 30-025-25525
9AM
WAYNE PRICE - OCD
SAM BLEVINS J.B.
1:00PM
6 AM
NOON
6 PM
MIDNIGHT

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

October 20, 2001

KEY ENERGY
[redacted], 18, 19128

CERTIFIED MAIL
RETURN RECEIPT NO. 5357 7546

Attention: Brine Well Operators

Re: Mechanical Integrity Testing of Brine Supply Wells

The Underground Injection Control Program of the Federal Safe Drinking Water Act requires that operators demonstrate mechanical integrity of all injection wells by ensuring there are no leaks in the tubing, casing, or packer, and injected/produced fluids are confined within the piping and injection zones.

The Oil Conservation Division (OCD) requires operators of brine supply wells to perform the following mechanical integrity test:

1. At least once every five years isolate the cavern formation from the casing/tubing annuals and hydrostatic fluid pressure test the casing at 300 psig for 30 minutes. New brine wells and wells being worked over will have to be tested in this manner before operations begin.

2. Annually perform an open hole cavern formation pressure test by pressuring up the formation with fluids to one and one-half times the normal operating pressure or 300 psig whichever is greater for four hours. However, no operator may exceed surface injection or test pressures that may cause formation fracturing or system failures. Systems requiring test pressures less than 300 psig or methods that use testing media other than fluids, i.e. gas, must be approved by OCD prior to testing. Brine supply wells operating with isolation packers will have to pressure test both the cavern formation and casing/tubing annuals.

Please find enclosed an "OCD Brine Well Test Schedule November 2001" and "Brine Well Test Procedure Guidance Document" for this November 26 through November 30, 2001. Please have your well ready for testing on the date and time you are scheduled. Please refer to the Well Test Schedule attached for the **Type of Test** you are scheduled to perform. You must receive prior OCD approval to alter the scheduled time or type of test.

What's New!! Please note that operators are required to have their pressure recording devices calibrated to 500 psig and 8-hour clock. See Guidance Document attached.

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

October 20, 2001

KEY ENERGY
BW-9A, 18, 19128

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RETURN RECEIPT NO. 5357 7546

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What's New!! Please note that operators are required to have their pressure recording devices calibrated to 500 psig and 8-hour clock. See Guidance Document attached.

What's New!! All operators will provide to the OCD the maximum test pressure that will not cause formation fracturing or system failures.

Operators will be responsible for providing equipment and shall bear all costs incurred. All tests must be witnessed by the New Mexico Oil Conservation Division. Operators failing to abide by the procedures, type of test, and time schedules listed herein may be required to shut-in their systems until OCD has an opportunity to approve and witness testing.

If you require any further information or assistance please do not hesitate to write or call me at 505-476-3487 or E-mail WPRICE@state.nm.us.

Sincerely Yours,

Wayne Price- Senior Envr. Engr..
Environnemental Bureau

cc: OCD District Offices

Attachments- 1. OCD Brine Well Test Schedule November 2001
2. Brine Well Testing Procedure Guidance Document

Brine Well Testing Procedure Guidance Document

1) The cavern and all piping must be filled, pressured up and stabilized for a period of at least 24 hours prior to testing. If this test requires a packer then casing/tubing annulus must be loaded with inert fluid 24 hours prior to testing.

2) Have manpower and equipment available for pressure test. Wellhead shall be prepared for test and all valves and gauges should be in good working order.

3) Pumps, tanks, external lines etc. must be isolated from the wellhead during test.

4) A continuous recording pressure device with an 8-hour clock (min) shall be installed on the casing/tubing annulus. The pressure range shall not be greater than 500 psig. The operator must provide proof that the pressure-recording device has been calibrated within the past 6 months. **Note: Wells with packer installed: *If this test requires both the casing/tubing annulus and cavern to be tested then two recording devices* must be supplied or one recording device with two pins.**

5) A minimum of one pressure gauge shall be installed on the casing/tubing annulus.

6) OCD must witness the beginning of test (putting chart on) and ending of test (removing chart). At the end of test operator may be required to bleed-off well pressure to demonstrate recorder and gauge response.

7) The Operator will supply the following information on the pressure chart:

   A. Company Name, Well Name, API #, Legal Location.
   B. Test Procedure (1) Casing + Formation (2) Casing Test Only (3) Both (4) Other
   C. Testing Media: Water, Gas, Oil, Etc.
   D. Date, time started and ending.
   E. Name (printed) and signature of company representative and OCD Inspector

8) <u>TEST ACCEPTANCE:</u> The OCD will use the following criteria in determining if a well has passed the Mechanical Integrity Test:

   A. <u>Passes</u> if Zero Bleed-Off during the test.
   B. <u>Passes</u> if Final Test Pressure is within ± 1% of Starting Pressure, if approved by the OCD inspector.
   C. <u>Fails</u> if any Final Test Pressure is greater than ± 1% of Starting Pressure. Operators must investigate for leaks and demonstrate that mechanical integrity of the well(s) by ensuring there are no leaks in the tubing, casing, or packer, and injected/produced fluids are confined within the piping and injection zones. Wells shall not resume operations until approved by OCD.

Note: **OCD recognizes that different operations, well designs, formation characteristics and field conditions may cause variations in the above procedures. If operator wishes to make or anticipate changes please notify the OCD for approval. All operators are responsible to notify OCD of any procedure that may cause harm to the well system or formation. Please be advised that OCD approval does not relieve any operator of liability should operations result in pollution of surface water, groundwater, or the environment.**

OCD BRINE WELL TESTING SCHEDULE 2001 OCD Contact Wayne Price cell 505-660-1067

Company	DP#	Facility Name		Date of Test	Start	Stop		Type of Test(s) Required	Contact Person	Telephone	FAX #/cell
		Crossroads Area									
Stearns Inc.	BW-013	Crossroads	Mon	26-Nov-01	12 noon	4:00 PM	2	Pressure test cavern	L.A. Stearns	1-505-675-2358	1-505-675-2339
		Loco Hills Area									
Marbob Brine Well	BW-029	M. Dodd "A" BW#1	Tue	27-Nov	9:00 AM	1:00 PM	2	Pressure test cavern	Doyle Davis	748-5975 cell	1-505-748-2523
Jims Water Ser.	BW-005	SE of Artesia	Tue	27-Nov	10:00 AM	2:00 PM	*	Pressure test cavern or casing	Sammy Stoneman	1-505-748-1352	1-505-748-3227
								* 1,2 or 3			
		Hobbs Area									
Key Energy	BW-018	Truckers #2 (Hobbs)	Wen	28-Nov-01	8:00 AM	12 noon	2	Pressure test cavern	Royce Crowell	(505) 393-9171	505-910-4185
Scurlock-Permian	BW-012	Hobbs Station	Wen	28-Nov-01	9:00 AM	1:00 PM	2	Pressure test cavern	Richard Lentz	505-392-8212	392-6988
Zia Transportation	BW-018	Salty Dog-Ark Jct	Wen	28-Nov-01	10:00 AM	2:00 PM	2	Pressure test cavern	Piter Bergstein	806-741-1080	
Marathon Brine St	BW-015	Marathon Road	Wen	28-Nov-01	11:30 AM	3:30 PM	1	Pressure Test Casing	CW Trainer		
		Eunice Area									
P&S Brine	BW-002	Eunice Brine Station	Thur	29-Nov-01	8:00 AM	12 noon	2	Pressure test cavern	Dink Prather	505-394-2545	394-2426
Key Simms-McCasland	BW-009A	Eunice Brine Station	Thur	29-Nov-01	9:00 AM	1:00 PM	2	Pressure test cavern	Royce Crowell	(505) 393-9171	505-910-4185
Yale E. Key (Old Goldstar)	BW-028	Eunice Brine Station	Thur	29-Nov-01	10:00 AM	2:00 PM	2	Pressure test cavern	Royce Crowell	1-505-394-2504	1-505-394-2560
		Carlsbad Area									
I & W	BW-06	Carlsbad -Euginie	Fri	30-Nov-01	8:00 AM	12 noon	2	Pressure test cavern	George Parchman	505-885-8663	885-8477
Key Energy-Carlsbad	BW-019	Rowland Truckers	Fri	30-Nov-01	9:00 AM	1:00 PM	2	Pressure test cavern	John Hutcheson	1-505-885-2053	cell 390-1833
Scurlock/Permian	BW-027 &27A	Carlsbad Brine St.	Fri	30-Nov-01	10:00 AM	2:00 PM	2	Pressure test cavern	Richard Lentz	505-392-8212	392-6988
		Wells Already Tested in 2001									
Gandy	BW-04	Wasserhund-Edison									
Gandy	BW-22	Tatum Brine St.									
Ray Westall	BW-21	Loco Hills Brine St.									
		Wells Being Repaired-									
Chaparral SWD	BW-25	Salado Brine #2- Jal									

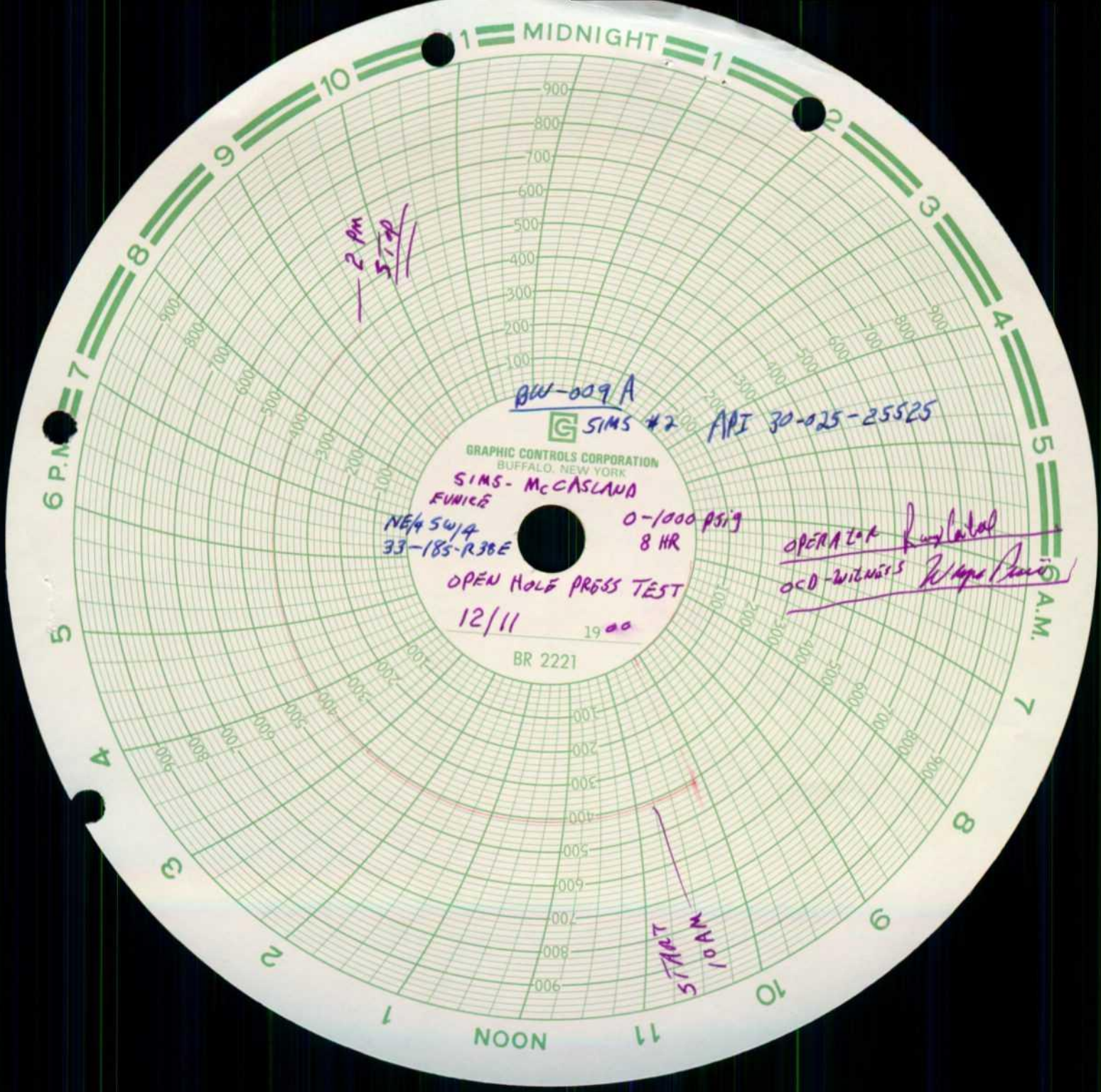
Notes:

Type of Pressure Test:

1 Casing Test — Isolate cavern formation from the casing/tubing annuals and hydrostatic fluid pressure test the casing at 300 psig for 30 minutes.

2 Open Hole Cavern Pressure Test — Open hole cavern formation pressure test by pressuring up the formation with fluid to one and one-half times the normal operating pressure or 300 psig whichever is greater for four hours. Operators shall not exceed surface pressures that may cause formation fracturing or system failures. OCD prior to test shall approve test pressures below 300 psig and methods that use media other than fluids. Brine supply wells operating with packers will have to pressure both the cavern formation and casing/tubing annuals.

3 Others — Nitrogen-Brine Interface Test, Nitrogen Test, Etc.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OCD-WITNESS
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NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

October 20, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. 5051 ~~4454~~ 4485 BW-009 S-M

Attention: Brine Well Operators

Re: Mechanical Integrity Testing of Brine Supply Wells

The Underground Injection Control Program of the Federal Safe Drinking Water Act requires that operators demonstrate mechanical integrity of all injection wells by ensuring there are no leaks in the tubing, casing, or packer, and injected/produced fluids are confined within the piping and injection zones.

The Oil Conservation Division (OCD) requires operators of brine supply wells to perform the following mechanical integrity tests:

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Please find enclosed an "OCD Brine Well Test Schedule December 2000" and "Brine Well Test Procedure Guidance Document" for this December 8th through 18th 2000. Please have your well ready for testing on the date and time you are scheduled. Please refer to the Well Test Schedule attached for the **type of test** you are scheduled to perform. You must receive prior OCD approval to alter the scheduled time or type of test.

Operators will be responsible for providing equipment and shall bear all costs incurred. All tests must be witnessed by the New Mexico Oil Conservation Division. Operators failing to abide by the procedures, type of test, and time schedules listed herein may be required to shut-in their systems until OCD has an opportunity to approve and witness testing.

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,

Wayne Price

Wayne Price-Pet. Engr. Spec.
Environmental Bureau

cc: OCD District Offices

Attachments- 1. OCD Brine Well Test Schedule December 2000.
2. Brine Well Testing Procedure Guidance Document.

OCD BRINE WELL TEST SCHEDULE December of 2000

Company	DP#	Facility Name	Date of Test	Start	Stop	Type of Test(s) Required	Contact Person	Telephone	FAX #
Marbob Brine Well	BW-029	M. Dodd "A" BW#1	December 08, 2000	1:00 PM	5:00 PM	2 Pressure test cavern	Doyle Davis Raye Miller	748-5975 cell 748-3303	1-505-746-2523
P&S Brine	BW-002	Eunice Eunice Water ST.	December 11, 2000	8 am	12 noon	2 Pressure test cavern	Paul Prather	1-505-394-2545	1-505-394-2426
Simms-McCasland	BW-009A	Eunice Brine Station	December 11, 2000	9:30 am	1:30 pm	2 Pressure test cavern	Bob Patterson	1-505-394-2581	1-505-394-2584
Salty Dog, Inc.	BW-008	Arkansas-Jct	December 11, 2000	11 am	3 pm	2 Pressure test cavern	Mr. Piter Bergstein Walter Brisco	1-806-741-1080	
Steams Inc.	BW-013	Crossroads	December 12, 2000	8:00 AM	12 noon	2 Pressure test cavern	L.A. Steams	1-505-675-2356	1-505-675-2339
Gandy Corp.	BW-022	Tatum Water St.	December 12, 2000	9:00 AM	1:00 PM	2 Pressure test cavern	Larry Gandy	1-505-398-4960	cell 369-5721
Key Energy	BW-018	Truckers #2 (Hobbs)	December 12, 2000	10:30 AM	2:30 PM	2 Pressure test cavern	Pete Turner	1-505-397-4994	1-505-393-9023
I&W Trucking	BW-006 &6A	Carlsbad Yard	December 13, 2000	8:00 AM	12 noon	2 Pressure test cavern	George Parchman	1-505-885-6663	1-505-885-8477
Loco Hills Brine	BW-021	Loco Hills	December 13, 2000	1:30 PM	5:30 PM	2 Pressure test cavern	D. Maloney or R. Harris	1-505-677-2370	1-505-677-2361
Goldstar	BW-028	Eunice Brine Station	December 14, 2000	9:30 am	1:30 pm	2 Pressure test cavern	Royce Crowell	1-505-394-2504	1-505-394-2560
Quality Oil (Salado Brine Sales)	BW-025	Salado Brine St. #2	December 14, 2000	11am	3 pm	2 Pressure test cavern	see P&S		
Key Energy-Carlsbad	BW-019	Rowland Truckers	December 15, 2000	8:00 AM	12 noon	2 Pressure test cavern	John Hutcheson		1-505-887-3011
Scurlock/Permian	BW-027 &27A	Carlsbad Brine St.	December 15, 2000	9:00 AM	1:00 PM	2 Pressure test cavern	Jim Ephraim	1-713-672-8092	1-713-672-7609
Jims Water Ser.	BW-005	SE of Artesia	December 15, 2000	10:30 AM	2:30 PM	2 Pressure test cavern	Sammy Stoneman	1-505-748-1352	1-505-746-3227
Scurlock-Permian	BW-012	Hobbs Station	December 18, 2000	8:00 AM	12 noon	2 Pressure test cavern	Richard Lentz	1-505-392-8212	1-505-392-6988
Gandy- WasserHaun	BW-004	Buckeye St.	December 18, 2000	9:00 AM	1:00 PM	2 Pressure test cavern	Larry Gandy	1-505-398-4960	cell 369-5721

Notes:

Type of Pressure Test:

1 Casing Test — Isolate cavern formation from the casing/tubing annuals and hydrostatic fluid pressure test the casing at 300 psig for 30 minutes.

2 Open Hole Cavern Pressure Test — Open hole cavern formation pressure test by pressuring up the formation with fluid to one and one-half times the normal operating pressure or 300 psig whichever is greater for four hours. Operators shall not exceed surface pressures that may cause formation fracturing or system failures. OCD prior to test shall approve test pressures below 300 psig and methods that use media other than fluids.
Brine supply wells operating with packers will have to pressure both the cavern formation and casing/tubing annuals.

3 Others — Nitrogen-Brine Interface Test, Nitrogen Test, Etc.

Brine Well Testing Procedure Guidance Document

1) The cavern and all piping must be filled, pressured up and stabilized for a period of at least 24 hours prior to testing. If this test requires or utilizes a packer then the casing/tubing annulus must be loaded with inert fluid 24 hours prior to testing.

2) Have manpower and equipment available for pressure test. Well head shall be prepared for test and all valves and gauges should be in good working order.

3) Pressure devices i.e pumps, truck pumps, etc. must be isolated from the well head during test.

4) A continuous recording pressure chart with an 8 hour clock shall be installed on the casing/tubing annulus, as directed by the OCD, with a pressure range of not greater than 500 psig. The operator must provide proof that pressure recording device has a range of 0-500 psig and has been calibrated within the past 6 months. Wells, with isolation packers installed, which requires both the casing/tubing annulus and cavern to be tested will require two recording devices or one recording device with two pins. Operators may utilize other types of pressure recording devices, such as electronic data loggers, etc., if approved by OCD.

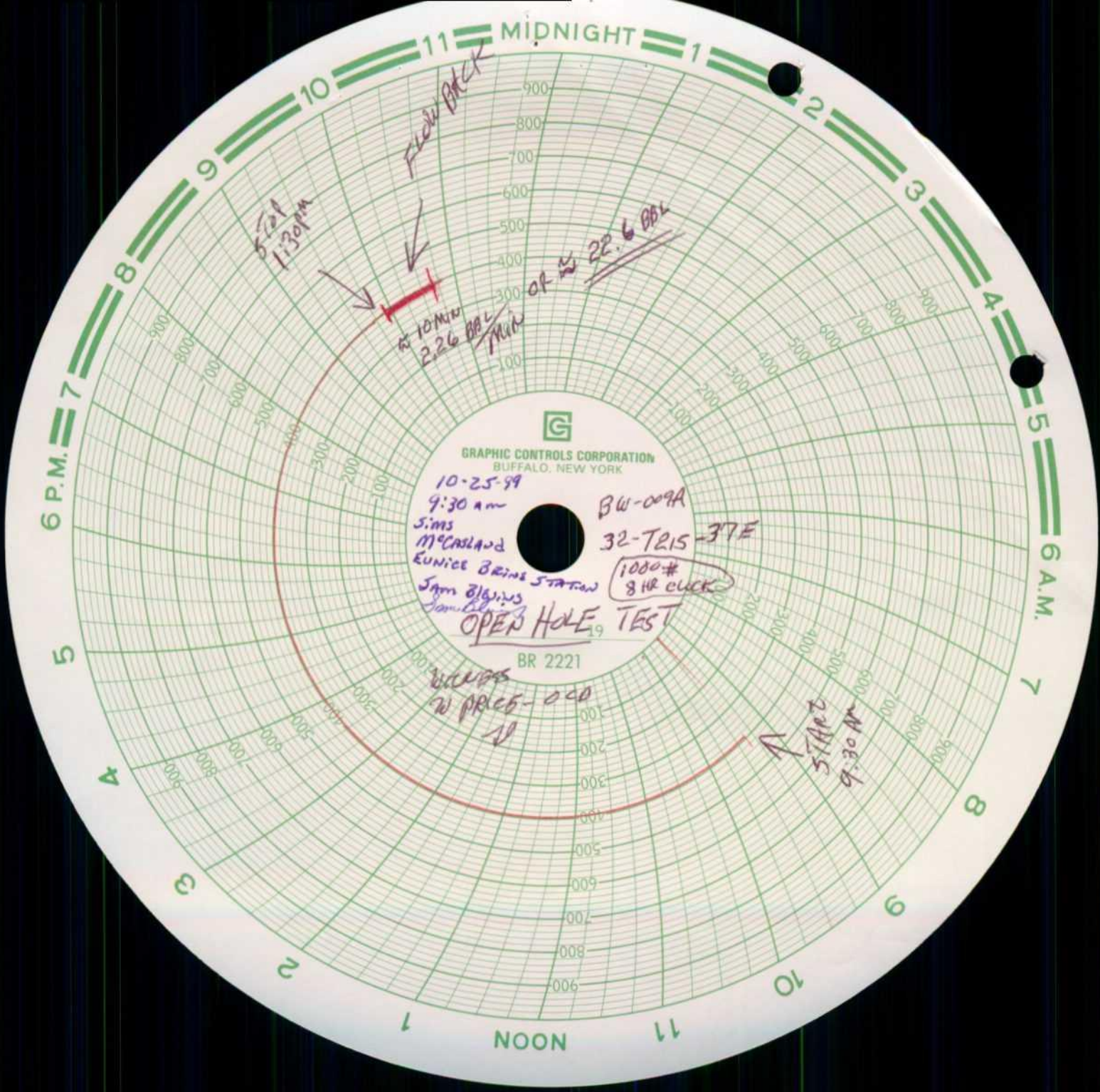
5) A minimum of one pressure gage shall be installed in the system as directed by OCD.

6) OCD must witness the beginning of test (putting chart on) and ending of test (removing chart). At the end of test operator may be required to bleed-off pressure to demonstrate recorder response.

7) **The Operator will supply the following information on the pressure chart before starting test:**

   1. Company name, discharge plan #, well name and number, legal location UL, section, township, range and county.
   2. Type of Test: Open Hole, Casing Test, or Both.
   3. Date, time test started, time stop.
   4. Chart and Recorder information. (can be attached)
   5. Normal operating surface and formation fracture pressure. (can be attached)
   6. **After Test Completed:**
      Name (printed) and signature of company representative and OCD inspector.

Note: NMOCD recognizes that different operations, well constructions, well designs and field conditions may cause variations in the above procedures. Operator is responsible to notify OCD of any procedure that may cause harm to the well or formation. If operator wishes to make or anticipate changes you must notify the OCD for approval.


MIDNIGHT
NOON
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FLOW BACK
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GRAPHIC CONTROLS CORPORATION
BUFFALO, NEW YORK
10-25-99
9:30 a.m
Sims
McCasland
EUNICE BRINE STATION
Sam Elgins
BW-009A
32-T21S-37E
1000#
8 HR CLOCK
OPEN HOLE TEST
BR 2221
W PRESS - 0 CO
START 9:30 AM

Southwestern Instrument Company
Clock - Meter and Gauge Repair Service

PHONE (505) 394 - 2377
EUNICE, NEW MEXICO 88231
P. O. BOX 1352

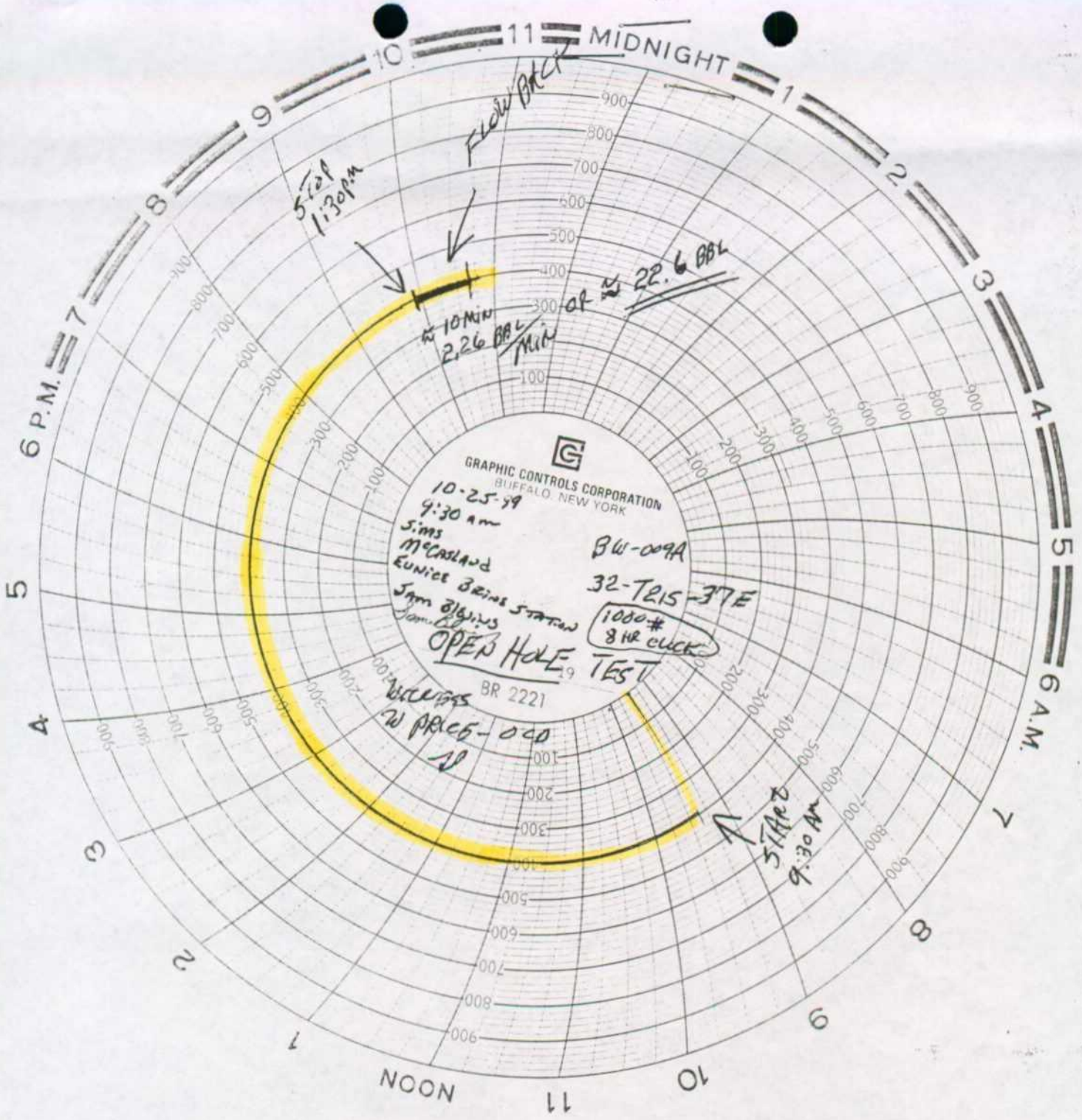
10-21-99

TO WHOM IT MAY CONCERN:

We hereby repairing and calibrating a 8" Metserco pressure recorder 0-1000 for Key Energy Service Inc. on the above date.

William S. Cottrell

William S. Cottrell


MIDNIGHT
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@ 10 MIN 2.26 BBL/MIN
@ 22.6 BBL
GRAPHIC CONTROLS CORPORATION
BUFFALO, NEW YORK
10-25-99
9:30 A.M.
Sims
McCasland
Eunice Brine Station
Sam Bigbins
OPEN HOLE
BR 2221
BW-009A
32-T21S-37E
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8 HR CLOCK
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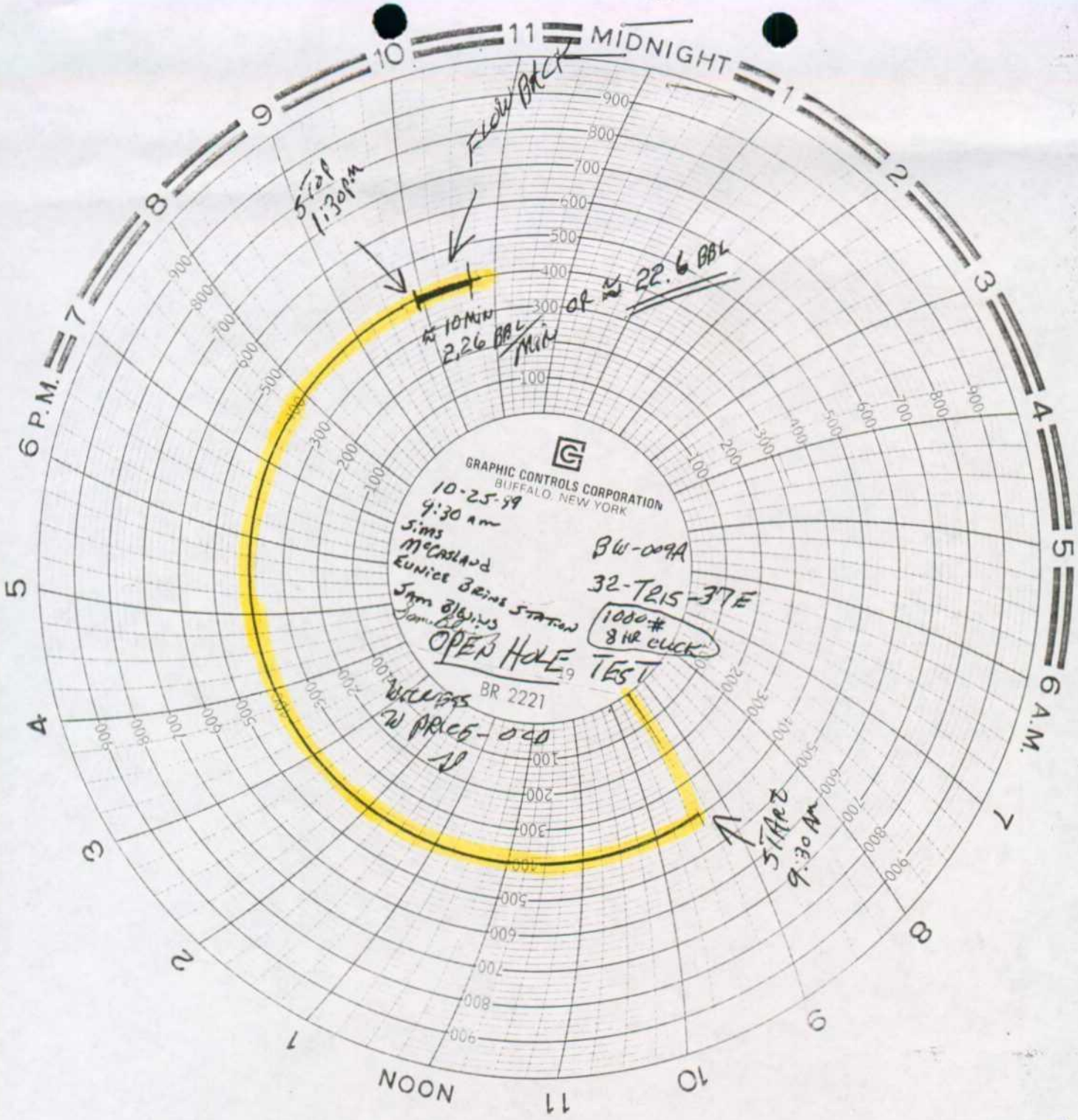
COPY


MIDNIGHT
NOON
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Flow Back
Stop 1:30 p.m.
@ 10 Min 2.26 BBL/Min
or 22.6 BBL
GRAPHIC CONTROLS CORPORATION
BUFFALO, NEW YORK
10-25-99
9:30 a.m.
Sims
McCasland
Eunice Brine Station
Sam Bibbins
OPEN HOLE
BR 2221
BW-009A
32-T21S-37E
1000#
8 HR CLOCK
TEST
Start 9:30 AM

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Fax: 1-505-394-2584

October 19, 1999

Mr. Bob Patterson
Sims-McCasland Water Sales
P.O. Box 99
Eunice, New Mexico 88231

Re: Mechanical Integrity Testing of Brine Supply Wells.

This is a reminder that New Mexico Oil Conservation Division (NMOCD) will be witnessing mechanical integrity test for all brine supply wells during the time period between October 25 through November 2, 1999. A schedule was sent to each operator on September 11, 1999.

Please note that if you were scheduled to "isolate the cavern and pressure test casing, and run a cavern survey", you will have the option this time to defer this procedure and just perform the annual open hole pressure test, however no bleed-off will be allowed. The NMOCD will notify you when these other conditions will be required.

Please have your well(s) ready for testing on the date and time you are scheduled. If there is some emergency which interferes with the scheduled date and time please call and notify NMOCD.

Failure to notify NMOCD may result in your operations being suspended until testing is complete.

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155) or notify Mr. Roger Anderson at (505-827-7152).

Sincerely Yours,

Wayne Price-Pet. Engr. Spec.
Environmental Bureau

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

September 11, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z 357 870 160

Mr. Bob Patterson
Sims-McCasland Water Sales
P.O. Box 99
Eunice, New Mexico 88231

Re: Mechanical Integrity Testing of Brine Supply Wells

Dear Mr. Bob Patterson:

The Underground Injection Control Program of the Federal Safe Drinking Water Act requires that operators demonstrate mechanical integrity of all injection wells by ensuring there are no leaks in the tubing, casing, or packer, and injected/produced fluids are confined within the piping and injection zones.

The Oil Conservation Division (OCD) requires operators of brine supply wells to perform the following mechanical integrity test:

1. At least once every five years isolate the cavern formation from the casing/tubing annuals and pressure test the casing at 300 psig for 30 minutes. New brine wells and wells being worked over will have to be tested in this manner before operations begin.

2. Annually perform an open hole cavern formation pressure test by pressuring up the formation one and one-half times the normal operating pressure (not to exceed formation fracture pressure) or 300 psig whichever is greater for four hours. Brine supply wells operating with packers will have to pressure both the cavern formation and casing/tubing annuals.

Please find enclosed an OCD Brine Well Test Schedule and Test Procedure for this Fall October 25, 1999 through November 2, 1999. Please have your well ready for testing on the date and time you are schedule. Operators will be responsible for providing equipment and shall bear all costs incurred. All test must be witnessed by the New Mexico Oil Conservation Division.

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,

Wayne Price-Pet. Engr. Spec.
Environmental Bureau

cc: OCD District Offices
attachments- OCD Brine Well Test Schedule & Brine Well Testing Procedure Guidance Document

OCD BRINE WELL TEST SCHEDULE

FALL OF 1999

Company		DP#	Facility Name	Date of Test	Start	Stop	Type of Test(s) Required
P&S Brine	**	BW-002	Eunice Eunice Water ST.	October 25 1999	8 am	12 noon	Isolate cavern & pressure test casing + Cavern survey***
Simms-McCasland	**	BW-009A	Eunice Brine Station	October 25 1999	9:30 am	1:30 pm	Isolate cavern & pressure test casing + Cavern survey***
Goldstar		BW-028	Eunice Brine Station	October 25 1999	11 am	3 pm	Pressure test cavern
Key Energy	**	BW-018	Rowland Truckers #2	October 26 1999	8 am	12 noon	Pressure test cavern + Cavern survey***
Scurlock-Permian	**	BW-012	Hobbs Station	October 26 1999	9:30 am	1:30 pm	Isolate cavern & pressure test casing + Cavern survey***
Salty Dog, Inc.	**	BW-008	Arkansas-Jct	October 26 1999	11 am	3 pm	Pressure test cavern + Cavern survey***
Quality Oil (Salado Brine Sales)	**	BW-025	Salado Brine St. #2	October 27 1999	8 am	12 noon	Isolate cavern & pressure test casing + Cavern survey***
Conoco	**	BW-001	Warren -McKee #3	October 27 1999	1:30 pm	5:30 pm	Isolate cavern & pressure test casing
Conoco	**	BW-001	Warren -McKee #4	October 27 1999	1:30 pm	5:30 pm	Isolate cavern & pressure test casing
[illegible]dality Brine		BW-022	Tatum Water St.	October 28 1999	9 am	1 pm	Pressure test cavern
Kenneth Tank Service		BW-013	Crossroads	October 28 1999	11 am	3 pm	Pressure test cavern
WasserHaun		BW-004	Buckeye	October 29 1999	9 am	1 pm	Pressure test cavern
Marathon Brine St.		BW-015	Marthon Road	October 29 1999	11 am	3 pm	Pressure test cavern
Loco Hills Brine		BW-021	Loco Hills	November 1 1999	9 am	1 pm	Pressure test cavern
Jims Water Ser.		BW-005	SE of Artesia	November 1 1999	11 am	3 pm	Pressure test cavern
I&W Trucking		BW-006 &6A	Carlsbad Yard	November 2 1999	8 am	12 noon	Pressure test cavern
Key Energy-Carlsbad		BW-019	Rowland Truckers	November 2 1999	9:30 am	1:30 pm	Pressure test cavern
Scurlock/Permian	**	BW-027 &27A	Carlsbad Brine St.	November 2 1999	11 am	3 pm	Isolate cavern & pressure test casing + Cavern survey***

Notes:

** Discharge Plan up for renewal

*** Cavern Surveys are Discharge Plan Requirments Companies have the option to perform now are at a later date approved by OCD.

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Brine Well Testing Procedure Guidance Document

1) The cavern and all piping must be filled, pressured up and stabilized for a period of at least 24 hours prior to testing. If this test requires a packer then casing/tubing annulus must be loaded with inert fluid 24 hours prior to testing.

2) Have manpower and equipment available for pressure test. Well head shall be prepared for test and all valves and gauges should be in good working order.

3) Pressure devices i.e pumps, truck pumps, etc. must be isolated from the well head before and during test.

4) A continuous recording pressure chart with an 8 hour clock shall be installed on the casing/tubing annulus. The pressure range shall not be greater than 1,000 psig. The operator must provide proof that the recording device has been calibrated within the past 6 months. **Note: Wells with packer installed: If this test requires both the casing/tubing annulus and cavern to be tested then two recording devices must be supplied or one recording device with two pins.**

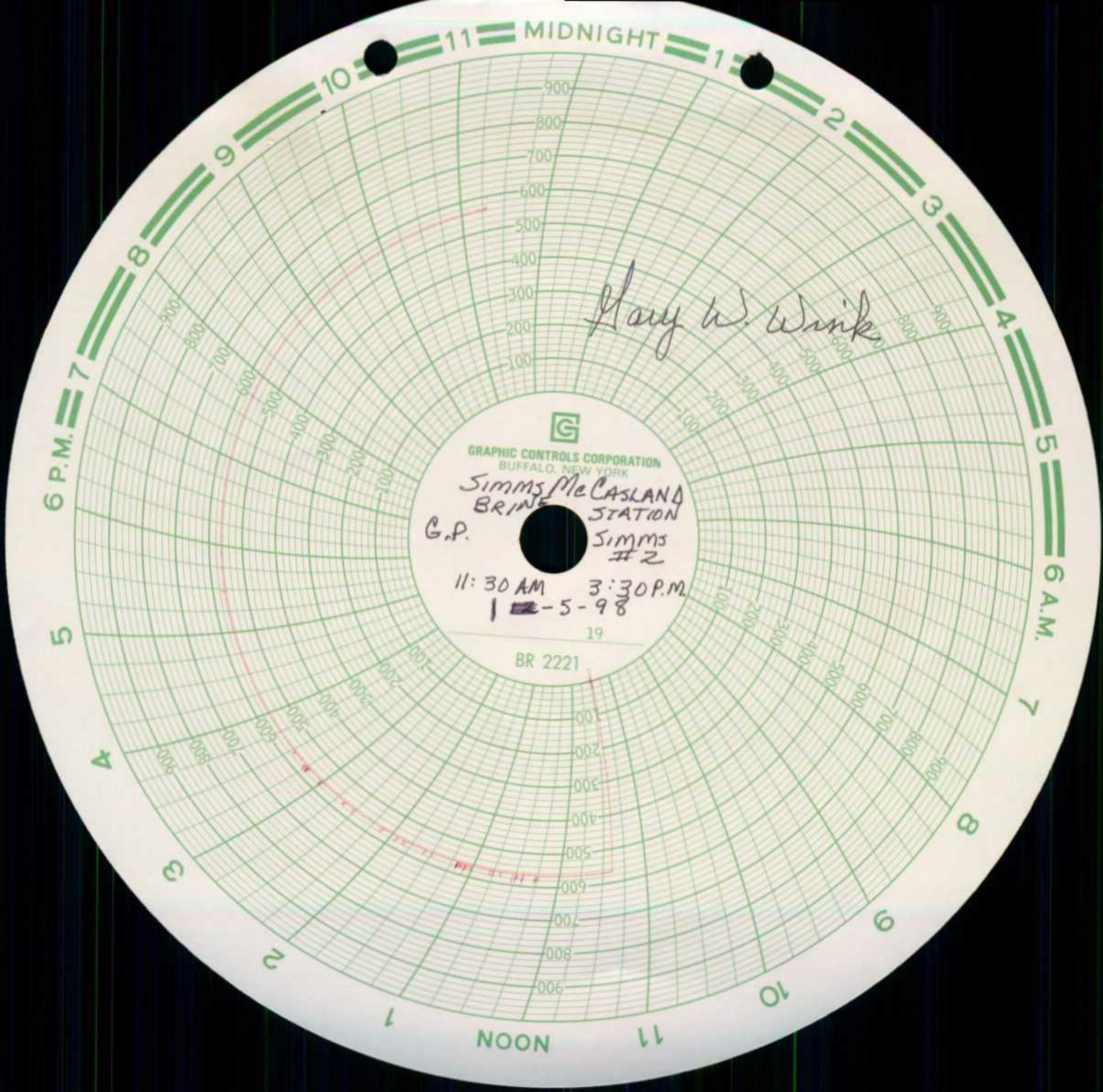
5) A minimum of one pressure gage shall be installed in the system.

6) OCD must witness the beginning of test (putting chart on) and ending of test (removing chart). At the end of test operator shall bleed-off pressure by 10% to demonstrate recorder response.

7) The following information shall be place on the chart:

   1. Date, time test started, time stop.
   2. Company name, Discharge Plan #, well name and number, legal location UL, section, township, range and county.
   3. Type of Test; Open hole, Casing Test, or Both.
   4. Printed name and signature of company representative and OCD representative.

Note: NMOCD recognizes that different operations, well constructions and field conditions may cause variations in the above procedures. If operator wishes to make or anticipate changes please notify the OCD for approval.


MIDNIGHT
NOON
6 P.M.
6 A.M.
GRAPHIC CONTROLS CORPORATION
BUFFALO, NEW YORK
Simms McCasland Brine Station
G.P.
Simms #2
11:30 AM 3:30 P.M.
1[redacted]-5-98
19
BR 2221
Gary W. Wink

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

August 12, 1997

Certified Mail
Return Receipt No. P-288-258-952

Mr. Bob Patterson
Sims-McCasland Water Sales
P.O. Box 99
Eunice, New Mexico 88231

RE: Mechanical Integrity Testing of Brine Supply Wells
Annual Test
Sims McCasland Water Sales BW-009
G.P. Sims #1 and #2
Lea County, New Mexico

Dear Mr. Patterson:

The Underground Injection Control Program of the Federal Safe Drinking Water Act requires that operators demonstrate mechanical integrity of all injection wells by ensuring that there are no leaks in the tubing, casing, or packer, and that the injected fluid is confined within the injection zone through proper cementing.

All brine wells that operate without a packer will be required to have an annual open hole pressure test equal to 1.5 times the normal operating pressure or 300 psi, whichever is greater, for four hours with a maximum of 10 percent bleed-off allowed. Every five years or at the time of discharge plan renewals they will be required to have an open hole pressure test equal to 1.5 times the normal operating pressure or 300 psi, whichever is greater, for four hours with zero bleed-off.

All brine wells that operate with a packer will be required to have an annual casing/tubing annulus pressure test equal to 300 psi for 30 minutes.

Operators will be responsible for providing equipment and shall bear all costs incurred. The date and time of all tests will be scheduled and witnessed by the New Mexico Oil Conservation Division.

Please have your wells ready for testing on September 17, 1997 at 10:30 AM as outlined below.

For brine wells operating without a packer:

1) The cavern must be pressured up and stabilized for a period of at least 24 hours prior to testing.

2) The system shall be tested to 1.5 times the normal operating pressure or 300 psi, whichever is greater, for a period of four hours. A maximum of 10 percent bleed-off will be allowed for annual tests. Testing conducted every five years or at the time of discharge plan renewal will have zero bleed-off.

3) A continuous recording pressure chart with an 8 hour clock shall be installed on the casing/tubing annulus. The pressure range shall not be greater than 1,000 psi.

4) Have well head prepared for test. All valves should be in good working order.

5) All gauges shall be in good working order.

6) Have manpower and equipment available for pressure test.

For brine wells operating with a packer:

1) Have the casing/tubing annulus and tubing loaded with inert fluid prior to testing.

2) The casing/tubing annulus shall be tested to 300 psi for 30 minutes.

3) A continuous recording pressure chart with an 8 hour clock shall be installed on the casing/tubing annulus. The pressure range shall not be greater than 1,000 psi.

4) Have well head prepared for test. All valves should be in good working order.

5) All gauges shall be in good working order.

6) Have manpower and equipment available for pressure test.

If you have any questions regarding this matter, please feel free to contact me at (505) 827-7155.

Sincerely,

Mark Ashley
Geologist

PS Form **3800**, April 1995

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

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Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	

P 288 258 452

NOON

MIDNIGHT

6 A.M.

6 P.M.

PALMER INSTRUMENTS, INC
CINCINNATI, OHIO

DATE ON

NUMBER

Sims - McCasland
9:00am 1/28 1987
12-B-62