



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Oil Conservation Division

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

29-Mar-04

MERIT ENERGY CO

12222 MERIT DR

STE 1500

DALLAS TX 75251-0000

**NOTICE 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

J L KEEL A No.014

30-015-05102-00-00

Active Injection - (All Types)

1-7-17S-31E

Test Date: 3/22/2004 2:18:45 PM

Permitted Injection PSI:

Actual PSI: 1550

Test Reason: Annual IMIT

Test Result: F

Repair Due: 6/25/2004

Test Type: Bradenhead Test

FAIL TYPE: Tubing

FAIL CAUSE:

Comments on MIT: Continuous blow on surface casing valve.

HUDSON FEDERAL No.001

30-015-05208-00-00

Active Injection - (All Types)

A-18-17S-31E

Test Date: 3/22/2004 1:25:41 PM

Permitted Injection PSI:

Actual PSI: 1800

Test Reason: Annual IMIT

Test Result: F

Repair Due: 6/25/2004

Test Type: Bradenhead Test

FAIL TYPE: Permit Violation

FAIL CAUSE:

Comments on MIT: Well is overpressured

TURNER A No.003

30-015-05211-00-00

Active Injection - (All Types)

K-18-17S-31E

Test Date: 3/22/2004 12:37:27 PM

Permitted Injection PSI:

Actual PSI: 1750

Test Reason: Annual IMIT

Test Result: F

Repair Due: 6/25/2004

Test Type: Bradenhead Test

FAIL TYPE: Permit Violation

FAIL CAUSE:

Comments on MIT: Well is overpressured

TURNER A No.011**30-015-05215-00-00**

P-18-17S-31E

Test Date: 3/22/2004 11:02:13 AM
Test Reason: Annual IMIT
Test Type: Bradenhead Test
Comments on MIT: Well is overpressured

Active Injection - (All Types)
Permitted Injection PSI:
Test Result: F
FAIL TYPE: Permit Violation

Actual PSI: 1750
Repair Due: 6/25/2004
FAIL CAUSE:

C A RUSSELL No.006**30-015-05219-00-00**

C-18-17S-31E

Test Date: 3/22/2004 1:01:26 PM
Test Reason: Annual IMIT
Test Type: Bradenhead Test
Comments on MIT: Well is overpressured

Active Injection - (All Types)
Permitted Injection PSI:
Test Result: F
FAIL TYPE: Permit Violation

Actual PSI: 1800
Repair Due: 6/25/2004
FAIL CAUSE:

C A RUSSELL No.008**30-015-05221-00-00**

G-18-17S-31E

Test Date: 3/22/2004 1:37:07 PM
Test Reason: Annual IMIT
Test Type: Bradenhead Test
Comments on MIT: Well is overpressured

Active Injection - (All Types)
Permitted Injection PSI:
Test Result: F
FAIL TYPE: Permit Violation

Actual PSI: 1800
Repair Due: 6/25/2004
FAIL CAUSE:

C A RUSSELL No.009**30-015-05222-00-00**

B-18-17S-31E

Test Date: 3/22/2004 1:14:58 PM
Test Reason: Annual IMIT
Test Type: Bradenhead Test
Comments on MIT: Well is overpressured

Active Injection - (All Types)
Permitted Injection PSI:
Test Result: F
FAIL TYPE: Permit Violation

Actual PSI: 1750
Repair Due: 6/25/2004
FAIL CAUSE:

TURNER A No.012**30-015-05238-00-00**

A-19-17S-31E

Test Date: 3/22/2004 11:05:48 AM
Test Reason: Annual IMIT
Test Type: Bradenhead Test
Comments on MIT: Well is overpressured

Active Injection - (All Types)
Permitted Injection PSI:
Test Result: F
FAIL TYPE: Permit Violation

Actual PSI: 1750
Repair Due: 6/25/2004
FAIL CAUSE:

TURNER A No.014**30-015-05239-00-00**

2-19-17S-31E

Test Date: 3/22/2004 11:15:44 AM
Test Reason: Annual IMIT
Test Type: Bradenhead Test
Comments on MIT: Over pressure limit

Active Injection - (All Types)
Permitted Injection PSI:
Test Result: F
FAIL TYPE: Permit Violation

Actual PSI: 1800
Repair Due: 6/25/2004
FAIL CAUSE:

FREN OIL COMPANY No.013**30-015-05261-00-00**

P-19-17S-31E

Test Date: 3/22/2004 9:29:15 AM
Test Reason: Annual IMIT
Test Type: Bradenhead Test
Comments on MIT: Well is overpressured

Active Injection - (All Types)
Permitted Injection PSI:
Test Result: F
FAIL TYPE: Permit Violation

Actual PSI: 1980
Repair Due: 6/25/2004
FAIL CAUSE:

TURNER B No.054**30-015-05443-00-00**

F-29-17S-31E

Test Date: 3/22/2004 10:15:48 AM
Test Reason: Annual IMIT
Test Type: Bradenhead Test
Comments on MIT: Well is overpressured

Active Injection - (All Types)
Permitted Injection PSI:
Test Result: F
FAIL TYPE: Permit Violation

Actual PSI: 1800
Repair Due: 6/25/2004
FAIL CAUSE:

TURNER B No.059**30-015-05446-00-00**

	Active Injection - (All Types)	
Test Date: 3/22/2004 10:24:09 AM	Permitted Injection PSI:	Actual PSI: 1900
Test Reason: Annual IMIT	Test Result: F	Repair Due: 6/25/2004
Test Type: Bradenhead Test	FAIL TYPE: Permit Violation	FAIL CAUSE:
Comments on MIT: Well is overpressured		

TURNER B No.068**30-015-05452-00-00**

	Active Injection - (All Types)	
Test Date: 3/22/2004 9:58:48 AM	Permitted Injection PSI:	Actual PSI: 1100
Test Reason: Annual IMIT	Test Result: F	Repair Due: 6/25/2004
Test Type: Bradenhead Test	FAIL TYPE: Casing	FAIL CAUSE:
Comments on MIT: SHUT-IN. Continuous blow on int casing valve.		

TURNER B No.048**30-015-05458-00-00**

	Active Injection - (All Types)	
Test Date: 3/22/2004 10:30:49 AM	Permitted Injection PSI:	Actual PSI: 1900
Test Reason: Annual IMIT	Test Result: F	Repair Due: 6/25/2004
Test Type: Bradenhead Test	FAIL TYPE: Permit Violation	FAIL CAUSE:
Comments on MIT: Over Pressure		

MAX FRIESS MA No.001**30-015-05459-00-00**

	Active Injection - (All Types)	
Test Date: 3/22/2004 9:34:30 AM	Permitted Injection PSI:	Actual PSI: 1900
Test Reason: Annual IMIT	Test Result: F	Repair Due: 6/25/2004
Test Type: Bradenhead Test	FAIL TYPE: Permit Violation	FAIL CAUSE:
Comments on MIT: Well is overpressured		

MAX FRIESS MA No.002**30-015-05469-00-00**

	Active Injection - (All Types)	
Test Date: 3/22/2004 10:39:23 AM	Permitted Injection PSI:	Actual PSI: 1750
Test Reason: Annual IMIT	Test Result: F	Repair Due: 6/25/2004
Test Type: Bradenhead Test	FAIL TYPE: Permit Violation	FAIL CAUSE:
Comments on MIT: Over Pressure Limit.		

TURNER B No.053**30-015-05472-00-00**

	Active Injection - (All Types)	
Test Date: 3/22/2004 9:47:50 AM	Permitted Injection PSI:	Actual PSI: 1825
Test Reason: Annual IMIT	Test Result: F	Repair Due: 6/25/2004
Test Type: Bradenhead Test	FAIL TYPE: Permit Violation	FAIL CAUSE:
Comments on MIT: Well is overpressured		

TURNER A No.035**30-015-20097-00-00**

	Active Injection - (All Types)	
Test Date: 3/22/2004 10:52:30 AM	Permitted Injection PSI:	Actual PSI: 1750
Test Reason: Annual IMIT	Test Result: F	Repair Due: 6/25/2004
Test Type: Bradenhead Test	FAIL TYPE: Permit Violation	FAIL CAUSE:
Comments on MIT: Well is overpressured		

TURNER A No.036**30-015-20098-00-00**

	Active Injection - (All Types)	
Test Date: 3/22/2004 10:54:48 AM	Permitted Injection PSI:	Actual PSI: 1900
Test Reason: Annual IMIT	Test Result: F	Repair Due: 6/25/2004
Test Type: Bradenhead Test	FAIL TYPE: Permit Violation	FAIL CAUSE:
Comments on MIT: Well is overpressured		

C A RUSSELL No.011**30-015-21258-00-00**

C-18-17S-31E

Test Date: 3/22/2004 1:10:00 PM
Test Reason: Annual IMIT
Test Type: Bradenhead Test
Comments on MIT: Well is overpressured

Active Injection - (All Types)
Permitted Injection PSI:
Test Result: F
FAIL TYPE: Permit Violation

Actual PSI: 1800
Repair Due: 6/25/2004
FAIL CAUSE:

HUDSON FEDERAL No.006**30-015-26008-00-00**

H-18-17S-31E

Test Date: 3/22/2004 1:19:48 PM
Test Reason: Annual IMIT
Test Type: Bradenhead Test
Comments on MIT: Well is overpressured

Active Injection - (All Types)
Permitted Injection PSI:
Test Result: F
FAIL TYPE: Permit Violation

Actual PSI: 1950
Repair Due: 6/25/2004
FAIL CAUSE:

HUDSON FEDERAL No.009**30-015-28790-00-00**

H-18-17S-31E

Test Date: 3/22/2004 1:31:11 PM
Test Reason: Annual IMIT
Test Type: Bradenhead Test
Comments on MIT: Well is overpressured

Active Injection - (All Types)
Permitted Injection PSI:
Test Result: F
FAIL TYPE: Permit Violation

Actual PSI: 1650
Repair Due: 6/25/2004
FAIL CAUSE:

TURNER A No.057**30-015-29000-00-00**

C-19-17S-31E

Test Date: 3/22/2004 12:49:57 PM
Test Reason: Annual IMIT
Test Type: Bradenhead Test
Comments on MIT: Well is overpressured

Active Injection - (All Types)
Permitted Injection PSI:
Test Result: F
FAIL TYPE: Permit Violation

Actual PSI: 1770
Repair Due: 6/25/2004
FAIL CAUSE:

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. Such a hearing may result in imposition of CIVIL PENALTIES for your violation of OCD rules.

Sincerely,



Artesia 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.