State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez Governor

David Martin Cabinet Secretary

Brett F. Woods, Ph.D. Deputy Cabinet Secretary **David Catanach, Division Director** Oil Conservation Division



Response Required - Deadline Enclosed

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

19-May-15

LINN OPERATING, INC. 600 Travis Street Suite 4900 Houston TX 77002-7002

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

FREN OIL COMPANY No.007				15-05255-00-00
		Active Injection - (All Types)		N-19-17S-31E
Test Date:	3/10/2015	Permitted Injection PSI:	Actual PSI:	1450
Test Reason:	5-year Test	Test Result: F	Repair Due:	6/13/2015
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:	
Comments on MIT: Well will not hold pressure. Pressured up to 300psi then immediate drop. Would not build after that.				
TURNER B No.043			30-0	15-05314-00-00
		Active Injection - (All Types)		M-20-17S-31E
Test Date:	5/5/2015	Permitted Injection PSI:	Actual PSI:	
Test Reason:	5-year Test	Test Result: F	Repair Due:	8/8/2015
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:	
Comments on MIT: Well will not hold pressure				

SKELLY UNIT No.088

30-015-05426-00-00

Active Injection - (All Types) A-28-17S-31E

4/8/2015 Permitted Injection PSI: 1100 Test Date: Actual PSI: Test Reason: 5-year Test Test Result: Repair Due: 7/12/2015

Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE:

Started to pressure up and fluid came from outside of casing just under collar. Comments on MIT:

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

P-29-17S-31E Active Injection - (All Types)

5/5/2015 Test Date: **Permitted Injection PSI:** Actual PSI: 1860 Test Reason: 5-year Test Test Result: F 8/8/2015 Repair Due:

Std. Annulus Pres. Test Test Type: FAIL TYPE: Other Internal Failure **FAIL CAUSE:**

Well will not hold pressure. Comments on MIT:

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

Active Injection - (All Types) C-29-17S-31E

5/5/2015 Test Date: Permitted Injection PSI: 1750 Actual PSI: 5-year Test Test Result: F 8/8/2015 Test Reason: Repair Due:

Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure Test Type: **FAIL CAUSE:**

Comments on MIT: Well will not hold pressure

SKELLY UNIT No.107

30-015-20410-00-00

Active Injection - (All Types) E-27-17S-31E 4/8/2015 Test Date: Permitted Injection PSI: Actual PSI: 1100

5-year Test Test Result: 7/12/2015 Test Reason: Repair Due:

Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure Test Type: FAIL CAUSE:

Well will not hold pressure. Comments on MIT:

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

Active Injection - (All Types) C-19-17S-31E

Test Date: 3/25/2015 Permitted Injection PSI: 1700 Actual PSI: 5-year Test F Test Reason: Test Result: Repair Due: 6/28/2015

Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure **FAIL CAUSE:**

Comments on MIT: Well will not hold pressure.

FRIESS FEDERAL No.005

30-015-29719-00-00

Active Injection - (All Types) J-19-17S-31E 3/10/2015

Test Date: Permitted Injection PSI: **Actual PSI:**

5-year Test Test Reason: Test Result: 6/13/2015 Repair Due:

Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure Test Type: FAIL CAUSE:

Comments on MIT: well will not hold pressure.

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.