State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

HOBBS OCD

John H. Bemis Cabinet Secretary

DEC 2 0 2012

Jami Bailey, Division Director Oil Conservation Division



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

RECEIVED

Response Required - Deadline Enclosed

Underground Injection Control Program

20-Dec-12

XTO ENERGY, INC. P.O. BOX 700 **EUNICE, NEW MEXICO 88231**

XTO ENERGY, INC. P.O. BOX 700 **EUNICE, NEW MEXICO 88231**

LETTER OF VIOLATION and SHUT-IN **DIRECTIVE Failed Mechanical Integrity Test**

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

EUNICE MONUMENT SOUTH UNIT B No.903

30-025-04290-00-00

Active Injection - (All Types)

E-23-20S-36E

Test Date:

10/24/2012

Permitted Injection PSI:

Actual PSI:

1/27/2013

Test Reason: Test Type:

5-year Test

Test Result:

Repair Due:

Std. Annulus Pres. Test

FAIL CAUSE:

Comments on MIT:

FAIL TYPE: Other Internal Failure

OPERATOR CONCEDES WELL WILL NOT PASS PRESSURE TEST ***OPERATOR IN

VIOLATION OF NMOCD RULE 19.15.26.11****

EUNICE MONUMENT SOUTH UNIT B No.897

30-025-04312-00-00

Active Injection - (All Types)

C-24-20S-36E

Test Date: Test Reason: 10/24/2012

Permitted Injection PSI:

Actual PSI:

Test Type:

5-year Test

Test Result:

Repair Due:

1/27/2013

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

FAIL CAUSE:

Comments on MIT: FAILED PRESSURE TEST; WELL WOULD NOT LOAD; ON VACUUM***OPERATOR IN

VIOLATION OF NMOCD RULE 19715726711***

EUNICE MONUMENT SOUTH UNIT No.261

30-025-04471-00-00 P-4-21S-36E

Active Injection - (All Types)

Test Date: 10/26/2012 Permitted Injection PSI:

Actual PSI:

1/29/2013

Test Reason:

Annual IMIT

Test Result:

Repair Due:

Test Type:

Bradenhead Test

FAIL CAUSE:

Comments on MIT:

FAIL TYPE: Other Internal Failure FAILED BHT; SALT WATER ON INTERMEDIATE CASING STRING WOULD NOT BLEED

DOWN; ***OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11****

EUNICE MONUMENT SOUTH UNIT No.241

Active Injection - (All Types)

30-025-04489-00-00 L-4-21S-36E

Test Date:

10/26/2012

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

1/29/2013

Test Type: Comments on MIT:

FAIL TYPE: Other Internal Failure Bradenhead Test

FAIL CAUSE:

COMMUNICATION BETWEEN TUBING AND CASING 700# ON PROD. CASING AND 739#

ON TUBING; FAILED BHT***OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11***

EUNICE MONUMENT SOUTH UNIT No.215

Active Injection - (All Types)

30-025-04508-00-00 L-5-21S-36E

Test Date:

10/25/2012

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

1/27/2013

Bradenhead Test Test Type:

Repair Due:

Comments on MIT:

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

CASING BUILDS BACK UP IMMEDIATELY; FAILED TEST: ***OPERATOR IN VIOLATION

OF NMOCD RULE 19.15.26.11***

EUNICE MONUMENT SOUTH UNIT No.223

30-025-04530-00-00

10/24/2012

Active Injection - (All Types) Permitted Injection PSI:

P-6-21S-36E

Test Date: Test Reason:

Test Result:

Actual PSI: Repair Due:

1/27/2013

Test Type:

5-year Test Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: FAILED PRESSURE TEST ***OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11 ****

EUNICE MONUMENT SOUTH UNIT No.279

30-025-04581-00-00 B-9-21S-36E

Active Injection - (All Types)

Test Date:

10/26/2012

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

Test Type: Bradenhead Test FAIL TYPE: Other Internal Failure

1/29/2013

FAIL CAUSE:

Comments on MIT:

FAILED BHT; FLUID DID NOT BLEED DOWN ON CASING: ****OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11***

EUNICE MONUMENT SOUTH UNIT No.438

30-025-04740-00-00 B-21-21S-36E

3/31/2013

1/29/2013

Test Date:

10/26/2012

Active Injection - (All Types) Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

Test Type:

Bradenhead Test

FAIL CAUSE:

FAIL TYPE: Other Internal Failure

PROD. CSG. DID NOT ATTEMPT TO BLEED DOWN OILY FLUID; 711# ON TUBING;

Comments on MIT:

FAILED BHT: POSSIBLE COMMUNICATION BETWEEN TUBING AND CASING; 680# ON

OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11*

EUNICE MONUMENT SOUTH UNIT No.446

30-025-04753-00-00

Active Injection - (All Types)

F-22-21S-36E

Test Date:

10/26/2012

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: BHT FAILURE: PROD. CASING WOULD NOT BLEED DOWN: ***OPERATOR IN

VIOLATION OF NMOCD RULE 19.15.26.11***

EUNICE MONUMENT SOUTH UNIT No.144

30-025-12543-00-00 G-36-20S-36E

Active Injection - (All Types)

Test Date:

10/24/2012

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

1/27/2013

Test Type:

Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT:

FAILED TEST DUE TO SURFACE CASING; PRIOR TO PT SURFACE SHOWED 200#-BLED SURFACE TO TRUCK GAS AND FLUID; PRESSURED UP ON CASING; 6 MIN'S INTO PT SURFACE CASING COMMENCED TO FLOW WITH SALT WATER***OPERATOR IN

VIOLATION OF NMOCD RULE 19.15.26.11***

EUNICE MONUMENT SOUTH UNIT No.225

30-025-29683-00-00

Active Injection - (All Types)

N-5-21S-36E

Test Date:

10/25/2012

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

1/28/2013

Test Type:

Bradenhead Test

FAIL CAUSE:

FAIL TYPE: Other Internal Failure

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Comments on MIT:

FAILED BHT; 1400# ON INTERMEDIATE CASING; 450# ON PROD. CASING; FAILED DUE

TO PRESSURE AMOUNT ON INTERM. CASING: **OPERATOR IN VIOLATION OF NMOCD

RULE 19.15.26.11***

EUNICE MONUMENT SOUTH UNIT No.696

30-025-34137-00-00 F-10-21S-36E

Active Injection - (All Types) Permitted Injection PSI:

Actual PSI:

Test Date: Test Reason: 10/29/2012 Annual IMIT

Test Result:

Repair Due:

2/1/2013

Test Type:

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Bradenhead Test FAILED BHT; OILY FLUID ON CASING DOES NOT BLEED DOWN; ****OPERATOR IN Comments on MIT:

VIOLATION OF NMOCD RULE 19.15.26.11*****

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.

Sincerely,

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.

EMNRU
OIL CONSERVATION DIVISION
1625 N FRENCH DRIVE
HOBBS NM 88240



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XTO ENERGY, INC. 200 N. LORAINE STE. 800 MIDLAND, TX 79701

EMNRD OIL CONSERVATION DIVISION 1625 N FRENCH DRIVE HOBBS NM 88240



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