

**UIC - 1 - 8**

**EPA FALL-OFF/  
SRT MONITORING**

**DATE:**

**2008 - Present**

**Chavez, Carl J, EMNRD**

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**From:** Chavez, Carl J, EMNRD  
**Sent:** Monday, July 14, 2008 3:08 PM  
**To:** 'Moore, Darrell'  
**Cc:** Price, Wayne, EMNRD; 'Lackey, Johnny'; Gum, Tim, EMNRD; Sanchez, Daniel J., EMNRD; Jones, William V., EMNRD  
**Subject:** Navajo WDWs # 1, 2 & 3 UIC Class I Well MITs

Mr. Moore:

I am in receipt of your 2008 Annual Bottom-Hole Pressure Surveys and Pressure Fall-Off Tests for WDW# 1, WDW# 2 and WDW# 3 (June 2008). However, it appears that Navajo did not perform the Annual MIT or Standard Annulus Pressure Test on the wells for the EPA reporting period ending June 30, 2008. OCD prefers that these annual MITs be performed before conducting a Fall-Off Test at each of the above wells, since equipment is mobilized and may be on-site. Please provide a tentative date and time for the MITs of the above subject injection wells for OCD to be present to witness.

Regarding the Fall-Off Test, Navajo did not submit a Test Plan for OCD approval in advance the Fall-Off Tests as requested in past correspondence. I notice that Appendix K Well Build Up/Falloff Test Plan was included in the report, but does not address the OCD Fall-Off Test Guidance and section on what a Test Plan shall consist of. The OCD will need to receive a Fall-Off Test Plan that addresses OCD Fall-Off Test Guidance at <http://www.emnrd.state.nm.us/ocd/documents/UICGuidance.pdf> (see section on "Test Plan") for approval. A properly completed Test Plan would have provided a schedule for the Fall-Off Test and MITs for each of the wells for the OCD to be present to witness the tests, once approved by the OCD. Unfortunately, all testing was performed without OCD knowledge of the exact dates and times for activities and the OCD was not present to witness the testing.

Finally, the OCD will review the Fall-Off Tests conducted in advance of submittal of an official Test Plan (see paragraph above); however, the OCD requires that a Test Plan be submitted for OCD review and approval in advance of any future Fall-Off Testing to ensure proper procedures are followed while conducting a Fall-Off Test (see Internet link provided above). The OCD recommends that Navajo compare and contrast the Test Plan requirements with its submittal in order to submit an approvable Test Plan.

Please contact me to arrange for an MIT and if you have questions. Thank you.

Carl J. Chavez, CHMM  
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(Pollution Prevention Guidance is under "Publications")

7/14/2008