



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

*Underground Injection Control Program  
"Protecting the Long-term Health of Drinking Water"*

31-Mar-05

## MELROSE OPERATING COMPANY

PO BOX 953

MIDLAND TX 79702-0000

### 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

##### ARTESIA UNIT No.001

30-015-01564-00-00

##### Active Injection - (All Types)

L-26-17S-28E

Test Date: 3/21/2005

Permitted Injection PSI:

Actual PSI: 1340

Test Reason: 5-year Test

Test Result: F

Repair Due: 6/24/2005

Test Type: Std. Annulus Pres. Test

FAIL TYPE: Permit Violation

FAIL CAUSE:

Comments on MIT: Injection pressure over limit

##### ARTESIA UNIT No.029

30-015-01742-00-00

##### Active Injection - (All Types)

N-35-17S-28E

Test Date: 3/21/2005

Permitted Injection PSI:

Actual PSI: 1000

Test Reason: Annual IMIT

Test Result: F

Repair Due: 6/24/2005

Test Type: Bradenhead Test

FAIL TYPE: Permit Violation

FAIL CAUSE:

Comments on MIT: Injection pressure over limit. No bradenhead connection visible.

##### ARTESIA UNIT No.023

30-015-01746-00-00

##### Active Injection - (All Types)

L-35-17S-28E

Test Date: 3/21/2005

Permitted Injection PSI:

Actual PSI: 1050

Test Reason: Annual IMIT

Test Result: F

Repair Due: 6/24/2005

Test Type: Bradenhead Test

FAIL TYPE: Lack of Bradenhead Conn

FAIL CAUSE:

Comments on MIT: No bradenhead connection visible

**ARTESIA UNIT No.032****30-015-01764-00-00**

M-36-17S-28E

**Active Injection - (All Types)**

<b>Test Date:</b>	3/21/2005	<b>Permitted Injection PSI:</b>		<b>Actual PSI:</b>	
<b>Test Reason:</b>	5-year Test	<b>Test Result:</b>	F	<b>Repair Due:</b>	6/24/2005
<b>Test Type:</b>	Std. Annulus Pres. Test	<b>FAIL TYPE:</b>	Casing	<b>FAIL CAUSE:</b>	
<b>Comments on MIT:</b> Well would not pressure-up.					

**ARTESIA UNIT No.044****30-015-01796-00-00**

E-3-18S-28E

**Active Injection - (All Types)**

<b>Test Date:</b>	3/22/2005	<b>Permitted Injection PSI:</b>		<b>Actual PSI:</b>	
<b>Test Reason:</b>	Annual IMIT	<b>Test Result:</b>	F	<b>Repair Due:</b>	6/25/2005
<b>Test Type:</b>	Bradenhead Test	<b>FAIL TYPE:</b>	Cement	<b>FAIL CAUSE:</b>	
<b>Comments on MIT:</b> Failure to repair previous violation.					

**STATE 14 B No.003****30-015-01855-00-00**

F-14-18S-28E

**Active Injection - (All Types)**

<b>Test Date:</b>	3/23/2005	<b>Permitted Injection PSI:</b>		<b>Actual PSI:</b>	300
<b>Test Reason:</b>	5-year Test	<b>Test Result:</b>	F	<b>Repair Due:</b>	6/26/2005
<b>Test Type:</b>	Std. Annulus Pres. Test	<b>FAIL TYPE:</b>	Casing	<b>FAIL CAUSE:</b>	
<b>Comments on MIT:</b> Well would not pressure-up.					

**STATE 647 AC 711 No.093****30-015-02053-00-00**

C-27-18S-28E

**Active Injection - (All Types)**

<b>Test Date:</b>	3/23/2005	<b>Permitted Injection PSI:</b>		<b>Actual PSI:</b>	550
<b>Test Reason:</b>	5-year Test	<b>Test Result:</b>	F	<b>Repair Due:</b>	6/26/2005
<b>Test Type:</b>	Std. Annulus Pres. Test	<b>FAIL TYPE:</b>	Casing	<b>FAIL CAUSE:</b>	
<b>Comments on MIT:</b> Well would not pressure-up.					

**STATE 647 AC 711 No.089****30-015-02055-00-00**

K-27-18S-28E

**Active Injection - (All Types)**

<b>Test Date:</b>	3/23/2005	<b>Permitted Injection PSI:</b>		<b>Actual PSI:</b>	
<b>Test Reason:</b>	5-year Test	<b>Test Result:</b>	F	<b>Repair Due:</b>	6/26/2005
<b>Test Type:</b>	Std. Annulus Pres. Test	<b>FAIL TYPE:</b>	Equipment - Specify in Co	<b>FAIL CAUSE:</b>	
<b>Comments on MIT:</b> Well will not hold pressure					

**GUAJALOTE STATE No.002****30-015-24930-00-00**

O-5-19S-29E

**Active Salt Water Disposal Well**

<b>Test Date:</b>	3/24/2005	<b>Permitted Injection PSI:</b>		<b>Actual PSI:</b>	720
<b>Test Reason:</b>	5-year Test	<b>Test Result:</b>	F	<b>Repair Due:</b>	6/27/2005
<b>Test Type:</b>	Std. Annulus Pres. Test	<b>FAIL TYPE:</b>	Casing	<b>FAIL CAUSE:</b>	
<b>Comments on MIT:</b> 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,

*Harry Huzl*  
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.