State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

David Martin
Cabinet Secretary

Tony Delfin
Deputy Cabinet Secretary

David Catanach, Director
Oil Conservation Division

Response Required - Deadline Enclosed

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

08-Sep-16

DEVON ENERGY PRODUCTION COMPANY, LP
PO Box 250
Artesia NM 88210-0000

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

COTTON DRAW UNIT **No.084** **30-015-29728-00-00**

Active Salt Water Disposal Well I-2-25S-31E

Test Date:	8/23/2016	**Permitted Injection PSI:**		**Actual PSI:**	1100
Test Reason:	Annual IMIT	**Test Result:**	F	**Repair Due:**	11/26/2016
Test Type:	Bradenhead Test	**FAIL TYPE:**	Other Internal Failure	**FAIL CAUSE:**	

Comments on MIT: 8/23 - Perform bradenhead test. Operator unable to open intermediate valve. It had pressure. Decided to get a crew out to change the valve.
9/8 - Conversation with Devon Engineer - Brent. They did a hot-tap into this string and found it has 2500psi on the string.
Surface casing - cemented to surface
1st intermediate 13 3/8 to 4350' no pressure
2nd intermediate 9 5/8 to 12200' 2500 psi
7" production casing - no pressure.

They put 14.5 mud down the string to block the pressure at 2800 lbs. They were not able to establish a flow rate. They are working on bleeding the pressure down so they can change out the valves rated for the pressure they are seeing. They have also set up monitoring this string. Brent said he would keep me informed of their progress.

Since there is no pressure on the casing, you can continue injection.

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,

Richard Inge

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.