nergy, Minerals and Natural Resources Department

Bill Richardson

Governor

Jon Goldstein Cabinet Secretary

Jim Noel

Deputy Cabinet Secretary

Mark Fesmire **Division Director** Oil Conservation Division



Response Required - Deadline Enclosed

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

14-May-10

LINM 02-09-149

SANDRIDGE EXPLORATION AND PRODUCTION, LLC

123 ROBERT S. KERR AVENUE OKLAHOMA CITY OK 73102-6406

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

SKELLY UNIT No.094

30-015-04884-00-00 G-28-17S-31E

Active Injection - (All Types)

5/13/2010 Permitted Injection PSI: **Test Date:** Actual PSI: 1950

5-year Test 8/16/2010 Test Reason: Test Result: Repair Due:

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

Well will not hold pressure Comments on MIT:

SKELLY UNIT No.061

30-015-05315-00-00 Active Injection - (All Types) C-21-17S-31E

5/12/2010 Permitted Injection PSI: 1190 Test Date: Actual PSI:

5-year Test Test Result: 8/15/2010 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:

SKELLY UNIT No.079 30-015-05369-00-00

> Active Injection - (All Types) N-23-17S-31E

5/13/2010 Test Date: Permitted Injection PSI: Actual PSI: 5-year Test Test Reason: Test Result: 8/16/2010 Repair Due:

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

Comments on MIT: Well will not hold pressure

Oil Conservation Division * 1301 W. Grand * Artesia, New Mexico 88210 Phone. 505-748-1283 * Fax: 505-748-9720 * http://www.emnrd.state.nm.us



SKELLY UNIT No.081

30-015-05371-00-00

Active Injection - (All Types)

P-23-17S-31E

Test Date:

5/13/2010

Permitted Injection PSI:

Actual PSI:

1000

Test Reason:

Annual IMIT

Test Result:

Repair Due:

8/16/2010

Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: SKELLY UNIT No.043

Strong blow of fluids from casing valve.

30-015-10500-00-00

Active Injection - (All Types)

C-22-17S-31E

Test Date:

5/11/2010

Permitted Injection PSI:

1300 Actual PSI:

Test Reason:

5-year Test

Test Result:

Repair Due:

8/14/2010

Test Type:

Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: SKELLY UNIT No.107

Well will not hold pressure

30-015-20410-00-00

Active Injection - (All Types) Permitted Injection PSI:

E-27-17S-31E

Test Date:

5/13/2010

Actual PSI:

8/16/2010

Test Reason: Test Type:

5-year Test

Test Result:

FAIL TYPE: Other Internal Failure

Repair Due:

FAIL CAUSE:

Comments on MIT:

Std. Annulus Pres. Test 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

12 WARD INGE

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.