



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

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Director

Oil Conservation Division

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

08-Mar-04

BP AMERICA PRODUCTION COMPANY

PO Box 1089

Eunice NM 88231-0000

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

EMPIRE ABO UNIT No.018

Temporarily Abandoned Oil (Producing)

30-015-01218-00-00
N-36-17S-27E

Test Date:	3/3/2004 1:20:54 PM	Permitted Injection PSI:	Actual PSI:
Test Reason:	TA Status Test	Test Result: F	Repair Due: 6/6/2004
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Casing	FAIL CAUSE:
Comments on MIT:	Pumped 20 bbls fluid- well on vacuum- unable to obtain pressure.		

EMPIRE ABO UNIT No.028C

Active Oil (Producing)

30-015-01669-00-00
I-32-17S-28E

Test Date:	3/3/2004 11:59:15 AM	Permitted Injection PSI:	Actual PSI:
Test Reason:	TA Status Test	Test Result: F	Repair Due: 6/6/2004
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Casing	FAIL CAUSE:
Comments on MIT:	Well on vaccum. Pumped 43 bbls fluid-unable to obtain pressure. Bradenhead valve connection broken off at casing.		

EMPIRE ABO UNIT No.271

Active Oil (Producing)

30-015-21540-00-00
O-32-17S-28E

Test Date:	3/3/2004 12:11:59 PM	Permitted Injection PSI:	Actual PSI:
Test Reason:	TA Status Test	Test Result: F	Repair Due: 6/6/2004
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Casing	FAIL CAUSE:
Comments on MIT:	Pumped 23 bbls fluid- well on vaccum- unable to obtain pressure.		

EMPIRE ABO UNIT No.131

Temporarily Abandoned Oil (Producing)

30-015-21828-00-00

M-2-18S-27E

Test Date:	3/3/2004	Permitted Injection PSI:		Actual PSI:	
Test Reason:	TA Status Test	Test Result:	F	Repair Due:	6/6/2004
Test Type:	Std. Annulus Pres. Test	FAIL TYPE:	Casing	FAIL CAUSE:	
Comments on MIT:	Strong continuous blow from bradenhead valve when annulus pressured up.				

EMPIRE ABO UNIT No.122

Active Oil (Producing)

30-015-22842-00-00

P-3-18S-27E

Test Date:	3/3/2004 8:28:31 AM	Permitted Injection PSI:		Actual PSI:	
Test Reason:	TA Status Test	Test Result:	F	Repair Due:	6/6/2004
Test Type:	Std. Annulus Pres. Test	FAIL TYPE:	Casing	FAIL CAUSE:	
Comments on MIT:	Strong gas flow from annulus valve. Unable to test.				

EMPIRE ABO UNIT No.123

Active Oil (Producing)

30-015-22849-00-00

P-3-18S-27E

Test Date:	3/3/2004 8:42:52 AM	Permitted Injection PSI:		Actual PSI:	
Test Reason:	TA Status Test	Test Result:	F	Repair Due:	6/6/2004
Test Type:	Std. Annulus Pres. Test	FAIL TYPE:	Casing	FAIL CAUSE:	
Comments on MIT:	Strong gas flow at annulus valve. Unable to test.				

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

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.