State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

Ken McQueen Cabinet Secretary

Matthias Sayer

Deputy Cabinet Secretary

David Catanach Division Director

Response Required - Deadline Enclosed

Underground Injection Control Program HOBBS OCD

"Protecting Our Underground Sources of Drinking Water

04-Apr-17

APR 04 2017

RECEIVED

LEGACY RESERVES OPERATING, LP P.O. BOX 10848

MIDLAND TX 79702-

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

COOPER JAL UNIT No.132

COOPER JAL UNIT No.242

30-025-09639-00-00 I-24-24S-36E

Active Injection - (All Types) Permitted Injection PSI: Actual PSI:

Active Injection - (All Types)

Test Date: 4/4/2017

Test Reason: Annual IMIT Test Result: Repair Due: 7/8/2017

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

MIT-FAILURE. RULE:19.15.26.11 Comments on MIT:

30-025-11149-00-00

C-19-24S-37E

Actual PSI: **Test Date:** 4/3/2017 Permitted Injection PSI:

Test Result: Repair Due: Test Reason: Annual IMIT 7/7/2017

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

MIT-FAILURE. RULE:19.15.26.11. 2nd and Final Notice of Failure. Need to submit 103, intent to repair or Comments on MIT:

plug well.

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,

Hobbs 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.

EMNRD OIL CONSERVATION DIVISION 1625 N FRENCH DRIVE HOBBS NM 88240



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