Energy, Minerals and Natural Resources Department

Susana Martinez Governor

John Bemis Cabinet Secretary

Brett F. Woods, Ph.D. Deputy Cabinet Secretary Jami Bailey Division Director Oil Conservation Division



Response Required - Deadline Enclosed

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

19-Mar-13

COG OPERATING LLC ONE CONCHO CENTER 600 W. ILLINOIS AVE

MIDLAND TX 79701

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

RAL UNIT No.027	<u>}</u> ,	30-015-02978-00-00		
	Active Injection - (All Types)		C-14-17S-29E	
3/18/2013	Permitted Injection PSI:	Actual PSI:	. 0	
5-year Test	Test Result: F	Repair Due:		
Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:		
MIT: Well will not hold pressu	ire		-	
19 ·		30-015-03146-00-00		
	Active Injection - (All Types)		O-27-17S-29E	
3/18/2013	Permitted Injection PSI:	Actual PSI:		
Annual IMIT	Test Result: F	Repair Due:	6/21/2013	
Bradenhead Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:	•	
MIT: Operator reports well wil	1 not pass an mit test. Test not run.		·	
OP UNIT No.001		30-015-03176-00-00		
	Active Injection - (All Types)		M-28-17S-29E	
3/18/2013	Permitted Injection PSI:	Actual PSI:		
Annual IMIT	Test Result: F	Repair Due:	6/21/2013	
Bradenhead Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:		
	3/18/2013 5-year Test Std. Annulus Pres. Test MIT: Well will not hold pressu 19 3/18/2013 Annual IMIT Bradenhead Test MIT: Operator reports well wil OP UNIT No.001 3/18/2013 Annual IMIT	3/18/2013Active Injection - (All Types)3/18/2013Permitted Injection PSI:5-year TestTest Result:Std. Annulus Pres. TestFAIL TYPE: Other Internal FailureMIT:Well will not hold pressure19Active Injection - (All Types)3/18/2013Permitted Injection PSI:Annual IMITTest Result:Bradenhead TestFAIL TYPE: Other Internal FailureMIT:Operator reports well will not pass an mit test. Test not run.OP UNIT No.001Active Injection - (All Types)3/18/2013Permitted Injection PSI:Annual IMITTest Result:S/18/2013Permitted Injection PSI:Annual IMITTest Result:	3/18/2013Active Injection - (All Types)3/18/2013Permitted Injection PSI:Actual PSI:5-year TestTest Result:FRepair Due:Std. Annulus Pres. TestFAIL TYPE: Other Internal FailureFAIL CAUSE:MIT:Well will not hold pressure30-0119Active Injection - (All Types)3/18/2013Permitted Injection PSI:Actual PSI:Annual IMITTest Result:FRepair Due:Bradenhead TestFAIL TYPE: Other Internal FailureFAIL CAUSE:MIT:Operator reports well will not pass an mit test.Test not run.OP UNIT No.001Active Injection - (All Types)30-013/18/2013Active Injection PSI:Actual PSI:3/18/2013Permitted Injection PSI:Actual PSI:3/18/2013Permitted Injection PSI:Actual PSI:Annual IMITTest Result:FBradenhead TestFail Type: Other Internal FailureFAIL CAUSE:Fail CAUSE:MIT:Operator reports well will not pass an mit test.Test not run.OP UNIT No.001Active Injection - (All Types)3/18/2013Permitted Injection PSI:Actual PSI:Annual IMITTest Result:FRepair Due:	

Operator reports well will not pass

Comments on MIT:

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NEW MEXICO E O STATE COM No.001

30-015-25077-00-00

			•	Active Salt Water Disposal Well
	Test Date:	3/19/2013	· · ·	Permitted Injection PSI:
•	Test Reason:	Annual IMIT		Test Result: F
	Test Type:	Bradenhead Test		FAIL TYPE: Other Internal Failure
	Comments on !	MIT: Blow of fluid	from casing.	Hooked up truck to bleed off, shut in valve a

E-20-17S-29E Actual PSI:

Repair Due: 6/22/2013

al Failure FAIL CAUSE: off, shut in valve and already had fluid when re-

OXY SPUMONI STATE No.001

XY SPUMONI STATE No.001		30-015-33089-00-00					
		Active Salt Water Disposal Wel	1	P-16-17S-31E			
Test Date:	3/18/2013	Permitted Injection PSI:	Actual PSI:				
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	6/21/2013			
Test Type:	Bradenhead Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:				
Comments on MIT: Operator reports well will not pass test. Test not run.							

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,

MALT SCHOOL

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.