State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

David Martin

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"

25-Apr-14

LINN OPERATING, INC. 600 TRAVIS SUITE 5100

HOUSTON TX 77002-

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

E WEST B	No.003			30-015-05068-00-00
	·	Active Injection - (All Types)		C-4-17S-31E
Test Date:	4/23/2014	Permitted Injection PSI:	Actual PSI:	
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	7/27/2014
Test Type:	Bradenhead Test	FAIL TYPE: Operational Violation	FAIL CAUSE:	
Comments on 1	MIT: Well has not been used	since 2/1/1992. Well must be plugged or repa	ired and returned	to injection.
		1 00 1		
ELLY UNI				30-015-05154-00-00
KELLY UNI		Active Injection - (All Types)		
ELLY UNI Test Date:			Actual PSI:	30-015-05154-00-00
	Т No.018	Active Injection - (All Types)		30-015-05154-00-00 D-15-17S-31E
Test Date:	Γ No.018 4/15/2014	Active Injection - (All Types) Permitted Injection PSI:	Actual PSI:	30-015-05154-00-00 D-15-17S-31E

SKELLY UNIT No.067

30-015-05339-00-00

Active Injection - (All Types)

J-21-17S-31E

Test Date:

4/14/2014

Permitted Injection PSI:

Actual PSI:

Test Reason:

5-year Test

Test Result:

1310

7/18/2014

Test Type:

Repair Due:

Comments on MIT:

Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Fluid started coming out from around wellhead just as it started to pressure up.

30-015-05350-00-00

SKELLY UNIT No.056

Active Injection - (All Types)

N-22-17S-31E

Test Date:

4/14/2014

Permitted Injection PSI:

Actual PSI:

Test Reason:

1270

5-year Test

Test Result:

Repair Due:

7/18/2014

Test Type:

Std. Annulus Pres. Test

Comments on MIT:

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Well will not hold pressure. Pressured up twice. Pressure immediately dropped off.

SKELLY UNIT No.081

Active Injection - (All Types)

30-015-05371-00-00 P-23-17S-31E

Test Date:

4/24/2014

Permitted Injection PSI:

Actual PSI:

Test Reason:

Repair Due:

7/28/2014

Test Type:

Annual IMIT

Test Result:

FAIL CAUSE:

Comments on MIT:

Bradenhead Test

FAIL TYPE: Other Internal Failure

Guage on casing showed 500psi. Tried to blow down and did not appear to slow down. Brought in a vac truck. After blowing down several minutes, casing psi was still 500psi.

SKELLY UNIT No.086

Active Injection - (All Types)

30-015-05421-00-00

Actual PSI:

C-27-17S-31E

Test Date: Test Reason: 4/24/2014 Annual IMIT Permitted Injection PSI:

Test Result:

Repair Due:

7/28/2014

Test Type:

FAIL TYPE: Other Internal Failure. Bradenhead Test

FAIL CAUSE:

Guage showed 900psi on casing string. Opened up valve and saw a strong blow of oil. Did not blow down Comments on MIT: any further so we would not cause a clean up.

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,

D 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.