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 David Catanach, Division Director Oil Conservation Division



30-015-10825-00-00

Response Required - Deadline Enclosed

Underground Injection Control Program "Protecting Our Underground Sources of Drinking

19-Mar-15

COG OPERATING LLC ONE CONCHO CENTER 600 W. ILLINOIS AVE

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.

COG has injected into two wells that have previously failed their MIT tests. Therefore COG is ordered to immediately shut-in these wells listed in this "Letter of Violation" and must also disconnect these wells from their injection lines. An OCD representative will verify if this instruction has been complied with sometime within the next week.

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

յ	ENKINS B F.	EDEKAL NO.003			30-015-04216-00-00
			Active Injection - (All Types)		C-20-17S-30E
	Test Date:	3/18/2015	Permitted Injection PSI:	Actual PSI:	0
	Test Reason:	5-year Test	Test Result: F	Repair Due:	6/21/2015
	Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:	
	Comments on	MIT: Well built up pressure fro	m 320 to 520 psi in 20 minutes.		

G J WEST COOP UNIT No.019

IZING D EEDEDAT N. 002

		Active Injection - (All Types)		C-28-17S-29E
Test Date:	3/17/2015	Permitted Injection PSI:	Actual PSI:	1470
Test Reason:	5-year Test	Test Result: F	Repair Due:	6/20/2015
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other External Failure	FAIL CAUSE:	
Comments on	MIT: Started to pressure up and	d fluid came outside of casing? Tubing? Wei	ll head is buried b	elow ground

	lo.047	Active Solt Water Dispesel Wa	11	30-015-20408-00-0 J-22-17S-29E
Test Date:	3/17/2015	Active Salt Water Disposal We Permitted Injection PSI:	Actual PSI:	J-22-1/S-29E
Test Date: Test Reason:	5-year Test	Test Result: F	Actual PS1: Repair Due:	6/20/2015
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:	
Comments on		1 twice, lost 40psi within 3 minutes.	FAIL CAUSE	
TZ STATE	UNIT No.107			30-015-20551-00-0
		Active Injection - (All Types)		E-16-17S-30E
Test Date:	3/18/2015	Permitted Injection PSI:	Actual PSI:	
Test Reason:	5-year Test	Test Result: F	Repair Due:	6/21/2015
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other External Failure	FAIL CAUSE:	
	•	ce valve. No valve handle, handle stem twisted o	II. NOT able to to	
M ROBINS	ON NO.001	A stive Salt Water Discord Wei	1	30-015-22037-00-0
Test Detes	2/17/2015	Active Salt Water Disposal Wel		E-27-17S-29E
Test Date: Test Reason:	3/17/2015 5-year Test	Permitted Injection PSI: Test Result: F	Actual PSI:	0 6/20/2015
	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	Repair Due: FAIL CAUSE:	
Test Type: Comments on	MIT: Continuous blow of f		TAIL CAUSE:	
	RAL UNIT No.023	-		30-015-25790-00-0
		Active Injection - (All Types)		D-14-17S-29E
Test Date:	3/17/2015	Permitted Injection PSI:	Actual PSI:	
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	6/28/2014
Test Type:	Bradenhead Test	FAIL TYPE: Operational Violation	FAIL CAUSE:	
ODD FEDEI	RAL UNIT No.043	Active Injection - (All Types)		30-015-26198-00-0 L-14-17S-29E
Test Date:	3/17/2015	Permitted Injection PSI:	Actual PSI:	
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	6/28/2014
Test Type:	Annual IMIT Bradenhead Test	Test Result: F FAIL TYPE: Operational Violation	Repair Due: FAIL CAUSE:	
	Annual IMIT Bradenhead Test MIT: Well was ordered sh	Test Result: F	Repair Due: FAIL CAUSE: . Well is conne	cted to flow line,
Test Type:	Annual IMIT Bradenhead Test MIT: Well was ordered sh looks like no repair o well for 10/2014.	Test Result: F FAIL TYPE: Operational Violation ut-in on 4/8/2014 due to mechanical test failure	Repair Due: FAIL CAUSE: . Well is conne	ected to flow line, tion reported for this
Test Type: Comments on	Annual IMIT Bradenhead Test MIT: Well was ordered sh looks like no repair o well for 10/2014. RAL No.001	Test Result: F FAIL TYPE: Operational Violation ut-in on 4/8/2014 due to mechanical test failure	Repair Due: FAIL CAUSE: Well is conne plug well. Injec	ected to flow line, ation reported for this 30-015-27882-00-0 0 B-11-17S-29E
Test Type: Comments on	Annual IMIT Bradenhead Test MIT: Well was ordered sh looks like no repair o well for 10/2014.	Test Result: F FAIL TYPE: Operational Violation ut-in on 4/8/2014 due to mechanical test failure done on well. No paperwork filed to repair or	Repair Due: FAIL CAUSE: Well is conne plug well. Injec	ected to flow line, action reported for this 30-015-27882-00-00
Test Type: Comments on B BER FEDE	Annual IMIT Bradenhead Test MIT: Well was ordered sh looks like no repair o well for 10/2014. RAL No.001 3/18/2015 Annual IMIT	Test Result: F FAIL TYPE: Operational Violation ut-in on 4/8/2014 due to mechanical test failure done on well. No paperwork filed to repair or Active Salt Water Disposal Well Permitted Injection PSI: Test Result: F	Repair Due: FAIL CAUSE: e. Well is conne plug well. Injec	ected to flow line, ation reported for this 30-015-27882-00-0 0 B-11-17S-29E
Test Type: Comments on i ABER FEDE Test Date: Test Reason: Test Type:	Annual IMIT Bradenhead Test MIT: Well was ordered sh looks like no repair o well for 10/2014. RAL No.001 3/18/2015 Annual IMIT Bradenhead Test	Test Result: F FAIL TYPE: Operational Violation ut-in on 4/8/2014 due to mechanical test failure done on well. No paperwork filed to repair or Active Salt Water Disposal Well Permitted Injection PSI: Test Result: F FAIL TYPE: Other Internal Failure	Repair Due: FAIL CAUSE: Well is conne plug well. Injec Actual PSI: Repair Due: FAIL CAUSE:	ected to flow line, etion reported for this 30-015-27882-00-00 B-11-17S-29E 500
Test Type: Comments on i ABER FEDE Test Date: Test Reason: Test Type: Comments on !	Annual IMIT Bradenhead Test MIT: Well was ordered sh looks like no repair o well for 10/2014. RAL No.001 3/18/2015 Annual IMIT Bradenhead Test MIT: Blow of fluid from cas	Test Result: F FAIL TYPE: Operational Violation ut-in on 4/8/2014 due to mechanical test failure done on well. No paperwork filed to repair or Active Salt Water Disposal Well Permitted Injection PSI: Test Result: F	Repair Due: FAIL CAUSE: Well is conne plug well. Injec Actual PSI: Repair Due: FAIL CAUSE:	ected to flow line, ection reported for this 30-015-27882-00-00 B-11-17S-29E 500 6/21/2015
Test Type: Comments on i ABER FEDE Test Date: Test Reason: Test Type: Comments on !	Annual IMIT Bradenhead Test MIT: Well was ordered sh looks like no repair o well for 10/2014. RAL No.001 3/18/2015 Annual IMIT Bradenhead Test	Test Result: F FAIL TYPE: Operational Violation ut-in on 4/8/2014 due to mechanical test failure done on well. No paperwork filed to repair or p Active Salt Water Disposal Well Permitted Injection PSI: Test Result: F FAIL TYPE: Other Internal Failure sing valve, continuous blow of air from surface value	Repair Due: FAIL CAUSE: Well is conne plug well. Injec Actual PSI: Repair Due: FAIL CAUSE:	acted to flow line, etion reported for this 30-015-27882-00-00 B-11-17S-29E 500 6/21/2015 30-015-33472-00-00
Test Type: Comments on i ABER FEDE Test Date: Test Reason: Test Type: Comments on N ENKINS B FI	Annual IMIT Bradenhead Test MIT: Well was ordered sh looks like no repair of well for 10/2014. RAL No.001 3/18/2015 Annual IMIT Bradenhead Test MIT: Blow of fluid from cas EDERAL No.015Q	Test Result: F FAIL TYPE: Operational Violation ut-in on 4/8/2014 due to mechanical test failure done on well. No paperwork filed to repair or Active Salt Water Disposal Well Permitted Injection PSI: Test Result: F FAIL TYPE: Other Internal Failure sing valve, continuous blow of air from surface va Active Injection - (All Types)	Repair Due: FAIL CAUSE: Well is conne plug well. Inject Actual PSI: Repair Due: FAIL CAUSE: alve.	ected to flow line, ection reported for this 30-015-27882-00-00 B-11-17S-29E 500 6/21/2015 30-015-33472-00-00 F-20-17S-30E
Test Type: Comments on i ABER FEDE Test Date: Test Reason: Test Type: Comments on N ENKINS B FI Test Date:	Annual IMIT Bradenhead Test MIT: Well was ordered sh looks like no repair of well for 10/2014. RAL No.001 3/18/2015 Annual IMIT Bradenhead Test MIT: Blow of fluid from cas EDERAL No.015Q 3/18/2015	Test Result: F FAIL TYPE: Operational Violation ut-in on 4/8/2014 due to mechanical test failure done on well. No paperwork filed to repair or Active Salt Water Disposal Well Permitted Injection PSI: Test Result: F FAIL TYPE: Other Internal Failure sing valve, continuous blow of air from surface va Active Injection - (All Types) Permitted Injection PSI:	Repair Due: FAIL CAUSE: . Well is conne plug well. Injec Actual PSI: Repair Due: FAIL CAUSE: dive. Actual PSI:	ected to flow line, ection reported for this 30-015-27882-00-00 B-11-17S-29E 500 6/21/2015 30-015-33472-00-00 F-20-17S-30E 700
Test Type: Comments on i ABER FEDE Test Date: Test Reason: Test Type: Comments on N ENKINS B FI Test Date: Test Date: Test Reason:	Annual IMIT Bradenhead Test MIT: Well was ordered sh looks like no repair of well for 10/2014. RAL No.001 3/18/2015 Annual IMIT Bradenhead Test MIT: Blow of fluid from cas EDERAL No.015Q 3/18/2015 5-year Test	Test Result: F FAIL TYPE: Operational Violation ut-in on 4/8/2014 due to mechanical test failure done on well. No paperwork filed to repair or Active Salt Water Disposal Well Permitted Injection PSI: Test Result: F FAIL TYPE: Other Internal Failure sing valve, continuous blow of air from surface va Active Injection - (All Types) Permitted Injection PSI: Test Result: F	Repair Due: FAIL CAUSE: . Well is conne plug well. Injec Actual PSI: Repair Due: FAIL CAUSE: dve. Actual PSI: Repair Due:	ected to flow line, ection reported for this 30-015-27882-00-00 B-11-17S-29E 500 6/21/2015 30-015-33472-00-00 F-20-17S-30E
Test Type: Comments on i ABER FEDE Test Date: Test Reason: Test Type: Comments on N ENKINS B FI Test Date:	Annual IMIT Bradenhead Test MIT: Well was ordered sh looks like no repair of well for 10/2014. RAL No.001 3/18/2015 Annual IMIT Bradenhead Test MIT: Blow of fluid from cas EDERAL No.015Q 3/18/2015 5-year Test Std. Annulus Pres. Test	Test Result: F FAIL TYPE: Operational Violation ut-in on 4/8/2014 due to mechanical test failure done on well. No paperwork filed to repair or p Active Salt Water Disposal Well Permitted Injection PSI: Test Result: F FAIL TYPE: Other Internal Failure sing valve, continuous blow of air from surface va Active Injection - (All Types) Permitted Injection PSI: Test Result: F FAIL TYPE: Other Internal Failure	Repair Due: FAIL CAUSE: . Well is conne plug well. Injec Actual PSI: Repair Due: FAIL CAUSE: dive. Actual PSI:	ected to flow line, ection reported for this 30-015-27882-00-00 B-11-17S-29E 500 6/21/2015 30-015-33472-00-00 F-20-17S-30E 700
Test Type: Comments on i ABER FEDE Test Date: Test Reason: Test Type: Comments on N ENKINS B FI Test Date: Test Reason: Test Reason: Test Type: Comments on N	Annual IMIT Bradenhead Test MIT: Well was ordered sh looks like no repair of well for 10/2014. RAL No.001 3/18/2015 Annual IMIT Bradenhead Test MIT: Blow of fluid from cas EDERAL No.015Q 3/18/2015 5-year Test Std. Annulus Pres. Test	Test Result: F FAIL TYPE: Operational Violation ut-in on 4/8/2014 due to mechanical test failure done on well. No paperwork filed to repair or p Active Salt Water Disposal Well Permitted Injection PSI: Test Result: F FAIL TYPE: Other Internal Failure sing valve, continuous blow of air from surface va Active Injection - (All Types) Permitted Injection PSI: Test Result: F FAIL TYPE: Other Internal Failure	Repair Due: FAIL CAUSE: . Well is conne plug well. Injec Actual PSI: Repair Due: FAIL CAUSE: dve. Actual PSI: Repair Due:	ected to flow line, ection reported for this 30-015-27882-00-00 B-11-17S-29E 500 6/21/2015 30-015-33472-00-00 F-20-17S-30E 700
Test Type: Comments on i ABER FEDE Test Date: Test Reason: Test Type: Comments on N ENKINS B FI Test Date: Test Reason: Test Reason: Test Type: Comments on N	Annual IMIT Bradenhead Test MIT: Well was ordered sh looks like no repair of well for 10/2014. RAL No.001 3/18/2015 Annual IMIT Bradenhead Test MIT: Blow of fluid from cas EDERAL No.015Q 3/18/2015 5-year Test Std. Annulus Pres. Test MIT: Well would not pressu SWD 33 No.004	Test Result: F FAIL TYPE: Operational Violation ut-in on 4/8/2014 due to mechanical test failure done on well. No paperwork filed to repair or p Active Salt Water Disposal Well Permitted Injection PSI: Test Result: F FAIL TYPE: Other Internal Failure sing valve, continuous blow of air from surface va Active Injection - (All Types) Permitted Injection PSI: Test Result: F FAIL TYPE: Other Internal Failure rest Result: F FAIL TYPE: Other Internal Failure re-up. Active Salt Water Disposal Well	Repair Due: FAIL CAUSE: Well is conne plug well. Inject Actual PSI: Repair Due: FAIL CAUSE: dve. Actual PSI: Repair Due: FAIL CAUSE:	ected to flow line, stion reported for this 30-015-27882-00-00 B-11-17S-29E 500 6/21/2015 30-015-33472-00-00 F-20-17S-30E 700 6/21/2015 30-015-37269-00-00 P-33-17S-30E
Test Type: Comments on i ABER FEDE Test Date: Test Reason: Test Type: Comments on N ENKINS B FI Test Date: Test Reason: Test Reason: Test Type: Comments on N	Annual IMIT Bradenhead Test MIT: Well was ordered sh looks like no repair of well for 10/2014. RAL No.001 3/18/2015 Annual IMIT Bradenhead Test MIT: Blow of fluid from cas EDERAL No.015Q 3/18/2015 5-year Test Std. Annulus Pres. Test MIT: Well would not pressu SWD 33 No.004 3/18/2015	Test Result: F FAIL TYPE: Operational Violation ut-in on 4/8/2014 due to mechanical test failure done on well. No paperwork filed to repair or p Active Salt Water Disposal Well Permitted Injection PSI: Test Result: F FAIL TYPE: Other Internal Failure sing valve, continuous blow of air from surface va Active Injection - (All Types) Permitted Injection PSI: Test Result: F FAIL TYPE: Other Internal Failure rest Result: F FAIL TYPE: Other Internal Failure re-up.	Repair Due: FAIL CAUSE: Well is conne plug well. Inject Actual PSI: Repair Due: FAIL CAUSE: dve. Actual PSI: Repair Due: FAIL CAUSE:	ected to flow line, stion reported for this 30-015-27882-00-00 B-11-17S-29E 500 6/21/2015 30-015-33472-00-00 F-20-17S-30E 700 6/21/2015 30-015-37269-00-00 P-33-17S-30E 1400
Test Type: Comments on i ABER FEDE Test Date: Test Reason: Test Type: Comments on N ENKINS B FI Test Date: Test Date: Test Reason: Test Type: Comments on N DCO HILLS	Annual IMIT Bradenhead Test MIT: Well was ordered sh looks like no repair of well for 10/2014. RAL No.001 3/18/2015 Annual IMIT Bradenhead Test MIT: Blow of fluid from cas EDERAL No.015Q 3/18/2015 5-year Test Std. Annulus Pres. Test MIT: Well would not pressu SWD 33 No.004 3/18/2015 5-year Test	Test Result: F FAIL TYPE: Operational Violation ut-in on 4/8/2014 due to mechanical test failure done on well. No paperwork filed to repair or p Active Salt Water Disposal Well Permitted Injection PSI: Test Result: F FAIL TYPE: Other Internal Failure sing valve, continuous blow of air from surface va Active Injection - (All Types) Permitted Injection PSI: Test Result: F FAIL TYPE: Other Internal Failure result: F FAIL TYPE: Other Internal Failure result: F FAIL TYPE: Other Internal Failure re-up. Active Salt Water Disposal Well Permitted Injection PSI: Test Result: F	Repair Due: FAIL CAUSE: . Well is conne plug well. Inject Actual PSI: Repair Due: FAIL CAUSE: dve. Actual PSI: Repair Due: FAIL CAUSE:	ected to flow line, stion reported for this 30-015-27882-00-00 B-11-17S-29E 500 6/21/2015 30-015-33472-00-00 F-20-17S-30E 700 6/21/2015 30-015-37269-00-00 P-33-17S-30E
Test Type: Comments on i ABER FEDE Test Date: Test Reason: Test Type: Comments on N ENKINS B FI Test Date: Test Reason: Test Type: Comments on N DCO HILLS Test Date:	Annual IMIT Bradenhead Test MIT: Well was ordered sh looks like no repair of well for 10/2014. RAL No.001 3/18/2015 Annual IMIT Bradenhead Test MIT: Blow of fluid from cas EDERAL No.015Q 3/18/2015 5-year Test Std. Annulus Pres. Test MIT: Well would not pressu SWD 33 No.004 3/18/2015 5-year Test Std. Annulus Pres. Test	Test Result: F FAIL TYPE: Operational Violation ut-in on 4/8/2014 due to mechanical test failure done on well. No paperwork filed to repair or p Active Salt Water Disposal Well Permitted Injection PSI: Test Result: F FAIL TYPE: Other Internal Failure sing valve, continuous blow of air from surface va Active Injection - (All Types) Permitted Injection PSI: Test Result: F FAIL TYPE: Other Internal Failure ire-up. Active Salt Water Disposal Well Permitted Injection PSI:	Repair Due: FAIL CAUSE: . Well is conne plug well. Inject Actual PSI: Repair Due: FAIL CAUSE: dve. Actual PSI: Repair Due: FAIL CAUSE: FAIL CAUSE:	ected to flow line, stion reported for this 30-015-27882-00-00 B-11-17S-29E 500 6/21/2015 30-015-33472-00-00 F-20-17S-30E 700 6/21/2015 30-015-37269-00-00 P-33-17S-30E 1400

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,

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.

> Oil Conservation Division * 811 S. First St. * Artesia, New Mexico 88210 Phone: 575-748-1283 * Fax: 575-748-9720 * http://www.emnrd.state.nm.us