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, Director
Oil Conservation Division

Response Required - Deadline Enclosed

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

18-Aug-15

HUDSON OIL COMPANY OF TEXAS
616 TEXAS ST
FORT WORTH TX 76102-

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

PUCKETT B No.021 — **30-015-05391-00-00**

Active Injection - (All Types) — O-24-17S-31E

Test Date:	8/18/2015	**Permitted Injection PSI:**		**Actual PSI:**	320
Test Reason:	5-year Test	**Test Result:**	F	**Repair Due:**	11/21/2015
Test Type:	Std. Annulus Pres. Test	**FAIL TYPE:**	Other Internal Failure	**FAIL CAUSE:**	

Comments on MIT: Well will not hold pressure. Pressured up to 500 psi 3 times, immediately dropped back to zero pressure.

PUCKETT A No.022 — **30-015-05393-00-00**

Active Injection - (All Types) — I-24-17S-31E

Test Date:	8/18/2015	**Permitted Injection PSI:**		**Actual PSI:**	0
Test Reason:	Annual IMIT	**Test Result:**	F	**Repair Due:**	11/21/2015
Test Type:	Bradenhead Test	**FAIL TYPE:**	Casing	**FAIL CAUSE:**	

Comments on MIT: Fluid leaking from casing just below cap.

PUCKETT A No.019 **30-015-05394-00-00**

Active Injection - (All Types) G-24-17S-31E

Test Date:	8/18/2015	**Permitted Injection PSI:**		**Actual PSI:**	600
Test Reason:	5-year Test	**Test Result:**	F	**Repair Due:**	11/21/2015
Test Type:	Std. Annulus Pres. Test	**FAIL TYPE:**	Casing	**FAIL CAUSE:**	

Comments on MIT: Fluid started coming from around casing when pressuring up.

PUCKETT A No.020 **30-015-05395-00-00**

Active Injection - (All Types) F-24-17S-31E

Test Date:	8/18/2015	**Permitted Injection PSI:**		**Actual PSI:**	480
Test Reason:	5-year Test	**Test Result:**	F	**Repair Due:**	11/21/2015
Test Type:	Std. Annulus Pres. Test	**FAIL TYPE:**	Other Internal Failure	**FAIL CAUSE:**	

Comments on MIT: Started to load well. Built up to 100psi, then pressure dropped and casing went on vacuum.

PUCKETT B No.007 **30-015-05430-00-00**

Active Injection - (All Types) B-25-17S-31E

Test Date:	8/18/2015	**Permitted Injection PSI:**		**Actual PSI:**	
Test Reason:	5-year Test	**Test Result:**	F	**Repair Due:**	11/21/2015
Test Type:	Std. Annulus Pres. Test	**FAIL TYPE:**	Other Internal Failure	**FAIL CAUSE:**	

Comments on MIT: Went to open surface valve and valve and pipe came up out of the ground. The ground end was corroded. Well initially pressured up, then dropped down to zero and would not build pressure after that.

PUCKETT A No.028 **30-015-10458-00-00**

Active Injection - (All Types) C-24-17S-31E

Test Date:	8/18/2015	**Permitted Injection PSI:**		**Actual PSI:**	180
Test Reason:	5-year Test	**Test Result:**	F	**Repair Due:**	11/21/2015
Test Type:	Std. Annulus Pres. Test	**FAIL TYPE:**	Casing	**FAIL CAUSE:**	

Comments on MIT: Fluid came out from outside of casing.

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,

Richard Inge

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.