State of New Mexico

Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

Tony Delfin Acting Cabinet Secretary David R. Catanach, Division Director Oil Conservation Division

Response Required - Deadline Enclosed

Underground Injection Control Program "Protecting Our Underground Sources of Drinking

28-Jul-16

YATES PETROLEUM CORPORATION 105 S 4TH ST

ARTESIA NM 88210

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

DONAHUE FEDERAL SWD No.001

30-015-00087-00-00

Active Salt Water Disposal Well

E-10-20S-24E

7/27/2016 Test Date:

Permitted Injection PSI:

Actual PSI:

0 10/30/2016

10/31/2016

Test Reason:

5-year Test

Test Result:

Repair Due:

Test Type:

Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: Well would not pressure-up. 30+ bbls of water put down hole. Well did not catch pressure.

BIG EDDY UNIT No.079Y

Active Salt Water Disposal Well

30-015-23385-00-00 J-21-21S-28E

Test Date:

7/28/2016

Permitted Injection PSI:

Actual PSI:

Test Reason:

Test Result:

Repair Due:

Test Type:

Annual IMIT

Bradenhead Test

F FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: Operator reports hole in tubing. Casing and tubing have same pressure. Test Reason:



ROUTH DEEP SWD No.002

Active Salt Water Disposal Well

30-015-23585-00-00 B-14-19S-24E

7/27/2016 Test Date: Permitted Injection PSI: Actual PSI:

FAIL CAUSE:

10/30/2016 Repair Due:

Test Type: Bradenhead Test FAIL TYPE: Other Internal Failure-Comments on MIT: Continuous blow from the casing valve. After 20+ minutes pressure did not decrease.

MIMOSA FEDERAL SWD No.001

Annual IMIT

30-015-26449-00-00

Active Salt Water Disposal Well I-4-20S-24E

Permitted Injection PSI: Actual PSI:

7/27/2016 Test Date:

Annual IMIT Test Reason: Test Result: Repair Due: 10/30/2016 FAIL TYPE: Other Internal Failure Bradenhead Test Test Type: FAIL CAUSE:

Comments on MIT: Steady blow from casing valve. Fluid looked oily.

MIMOSA FEDERAL SWD No.003Y

30-015-29123-00-00

Active Salt Water Disposal Well P-4-20S-24E

Test Date: 7/27/2016 Permitted Injection PSI: Actual PSI:

Test Result:

Test Reason: 5-year Test Test Result: 10/30/2016 Repair Due:

Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure Test Type: FAIL CAUSE: Well would not pressure up. 45bbls dumped down hole and pressure would not catch.

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

PICHOED INGE

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,