nergy, Minerals and Natural Resources Department

Bill Richardson

Governor

Jon Goldstein Cabinet Secretary

Jim Noel **Deputy Cabinet Secretary**

Mark Fesmire Division Director Oil Conservation Division



Response Required - Deadline Enclosed

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

22-Apr-10

LINN OPERATING, INC. 600 TRAVIS SUITE 5100 HOUSTON TX 77002

LOVNO 02-09-148

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

H E WEST B No.016

Active Injection - (All Types)

30-015-05056-00-00 M-3-17S-31E

Test Date:

4/15/2010

Permitted Injection PSI:

Actual PSI:

Test Result:

1850

Test Reason:

5-year Test

Repair Due:

7/19/2010

Test Type:

Std. Annulus Pres. Test

FAIL CAUSE:

Comments on MIT:

FAIL TYPE: Other Internal Failure

Well will not hold pressure. Casing had 500 psi on back side. Once this was bleed off, well took over 5 bbls to start to pressure up. Once pressured up to 400 psi, it dropped 60 psi in less than 1 minute.

H E WEST B No.026

Active Injection - (All Types)

30-015-05060-00-00 I-3-17S-31E

Test Date:

4/15/2010

Permitted Injection PSI:

Actual PSI:

Test Reason: Test Type:

5-year Test

Test Result:

Repair Due:

7/19/2010

7/18/2010

Comments on MIT:

Std. Annulus Pres. Test Well will not hold pressure

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

30-015-05065-00-00

H E WEST A No.006

Active Injection - (All Types)

H-4-17S-31E

Test Date:

4/14/2010

Permitted Injection PSI:

Actual PS1:

2000

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: Water came outside of casing when pressuring up.

TURNER B No.056

Test Date:

Test Type:

Test Reason:

4/6/2010

5-year Test

Comments on MIT: Well will not hold pressure

Std. Annulus Pres. Test

Active Injection - (All Types) Is50 Is50 Test Reason: 5-year Test Test Reason: 5-year Test Test Reason: 5-year Test Test Reason: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE: Test Date: 4/8/2010 Permitted Injection PSI: Active Injection - (All Types) Active Injection - (All Types) Test Reason: S-year Test Test Reason: S-	2-00-00 -31E 8-00-00 31E
Test Reason: 5-year Test	8-00-00 31E
Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure Comments on MIT: Well will not hold pressure	8-00-00 31E
Comments on MIT: Well will not hold pressure	8-00-00 31E
Active Injection - (All Types) K-7-17S-17S-17S-17S-17S-17S-17S-17S-17S-1	8-00-00 31E
Test Date: 4/8/2010 Permitted Injection PSI: Actual PSI: Test Reason: 5-year Test Test Result: F Repair Due: 7/12/2010 Test Type: Std. Annulus Pres. Test Test Result: F Repair Due: 7/12/2010 Test Type: Std. Annulus Pres. Test Test Result: F Repair Due: 7/12/2010 Test Type: Std. Annulus Pres. Test Active Injection - (All Types) I-7-17S-2 Test Date: 4/16/2010 Permitted Injection PSI: Actual PSI: Test Result: F Repair Due: 7/20/2010 Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE: Comments on MIT: Fluid started coming out of casing after pressure blew down. Pressure also on intermediate string. J L KEEL A No.012 Active Injection - (All Types) A-7-17S-1 Test Date: 4/16/2010 Permitted Injection PSI: Actual PSI: 1830 Test Reason: 5-year Test Test Result: F Repair Due: 7/20/2010 Test Reason: 5-year Test Test Result: F Repair Due: 7/20/2010 Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE: Comments on MIT: Well will not hold pressure. Dropped 80 psi in 30 minutes. H E WEST B No.012 Active Injection - (All Types) G-9-17S-2 Test Date: 4/15/2010 Permitted Injection PSI: Actual PSI: 1860 Test Reason: 5-year Test Test Result: F Repair Due: 7/19/2010 Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE: Test Date: 4/15/2010 Permitted Injection PSI: Actual PSI: 1860 Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE: Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE: Test Type: Std. Annulus Pres. Test FAIL Type: Other Internal Failure FAIL CAUSE: Test Type: Std. Annulus Pres. Test FAIL Type: Other Internal Failure FAIL CAUSE: Test Type: Std. Annulus Pres. Test FAIL Type: Other Internal Failure FAIL CAUSE: Test Type:	8-00-00 31E 0-00-00
Test Reason: 5-year Test Test Result: F Repair Due: 7/12/2010 Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure Comments on MIT: Well will not hold pressure. When we started to pressure up on casing, water came out of intermediate. J L KEEL A No.010 Active Injection - (All Types) Test Date: 4/16/2010 Permitted Injection PSI: Repair Due: 7/20/2010 Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE: Comments on MIT: Fluid started coming out of casing after pressure blew down. Pressure also on intermediate string. J L KEEL A No.012 Active Injection - (All Types) Test Reason: 5-year Test Test Result: F Repair Due: 7/20/2010 Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE: Comments on MIT: Well will not hold pressure. Dropped 80 psi in 30 minutes. H E WEST B No.012 Active Injection - (All Types) Test Date: 4/15/2010 Permitted Injection PSI: Actual PSI: 1860 Test Reason: 5-year Test Test Result: F Repair Due: 7/19/2010 Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE: Comments on MIT: Well will not hold pressure. Well had immediate bleed off. TURNER A No.015 Active Injection - (All Types) Active Injection - (All Types) F-19-178-2	31E 0-00-00
Test Type: Std. Annulus Pres. Test	31E 0-00-00
Comments on MIT: Well will not hold pressure. When we started to pressure up on casing, water came out of intermediate. J L KEEL A No.010 Active Injection - (All Types) Test Date: 4/16/2010 Permitted Injection PSI: Actual PSI: Test Reason: 5-year Test FAIL TYPE: Other Internal Failure Comments on MIT: Fluid started coming out of casing after pressure blew down. Pressure also on intermediate string. J L KEEL A No.012 Active Injection - (All Types) Active Injection - (All Types) Actual PSI: Actual PSI: FAIL CAUSE: Comments on MIT: Fluid started coming out of casing after pressure blew down. Pressure also on intermediate string. J L KEEL A No.012 Active Injection - (All Types) Active Injection PSI: Actual PSI: 1830 Test Reason: 5-year Test Test FAIL TYPE: Other Internal Failure Comments on MIT: Well will not hold pressure. Dropped 80 psi in 30 minutes. H E WEST B No.012 Active Injection - (All Types) Active Injection - (All Types) Active Injection - (All Types) G-9-17S-2 Active Injection - (All Types) Fail CAUSE: G-9-17S-2 Active Injection - (All Types) Fail CAUSE: G-9-17S-2 Active Injection - (All Types) Fail CAUSE: Test Reson: 5-year Test Test Fail TYPE: Other Internal Failure Failure Comments on MIT: Well will not hold pressure. Well had immediate bleed off. TURNER A No.015 Fermitted Injection PSI: Active Injection - (All Types) Active Injection - (All Types) Fail CAUSE: 30-015-05240- Active Injection - (All Types) Failure Comments on MIT: Well will not hold pressure. Well had immediate bleed off. TURNER A No.015 Fermitted Injection PSI: Active Injection - (All Types) Failure Cause: Active Injection - (All Types) Failure Cause: Active Injection - (All Types) Failure Cause: Failure Cause: Failure Cause: Failure Cause: Active Injection - (All Types) Failure Cause: Failure Cause: Active Injection - (All Types) Failure Cause: Failure Cause: Active Injection - (All Types) Failure Cause: Failure Cause: Active Injection - (All Types) Failure Cause: Active Injection	31E 0-00-00
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Test Reason: 5-year Test Test Result: F Repair Due: 7/20/2010 Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure Comments on MIT: Fluid started coming out of casing after pressure blew down. Pressure also on intermediate string. J L KEEL A No.012 Active Injection - (All Types) Test Date: 4/16/2010 Permitted Injection PSI: Actual PSI: 1830 Test Reason: 5-year Test Test Result: F Repair Due: 7/20/2010 Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure Comments on MIT: Well will not hold pressure. Dropped 80 psi in 30 minutes. H E WEST B No.012 Active Injection - (All Types) Test Reason: 5-year Test Test Result: F Repair Due: 7/19/2010 Test Reason: 5-year Test Test Result: F Repair Due: 7/19/2010 Test Reason: 5-year Test FAIL TYPE: Other Internal Failure Comments on MIT: Well will not hold pressure. Well had immediate bleed off. TURNER A No.015 Active Injection - (All Types) Active Injection - (All Types) Active Injection - (All Types) F-19-17S-2 Active Injection - (All Types) Active Injection - (All Types) F-19-17S-2	
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Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure Comments on MIT: Well will not hold pressure. Well had immediate bleed off. TURNER A No.015 Active Injection - (All Types) Test Date: 4/7/2010 Permitted Injection PSI: Actual PSI: 1650 Test Reason: 5-year Test Test Result: F Repair Due: 7/11/2010	-
Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure Comments on MIT: Well will not hold pressure. Well had immediate bleed off. TURNER A No.015 Active Injection - (All Types) Test Date: 4/7/2010 Permitted Injection PSI: Actual PSI: 1650 Test Reason: 5-year Test Test Result: F Repair Due: 7/11/2010	
TURNER A No.015 30-015-05240-052	
Active Injection - (All Types) Test Date: 4/7/2010 Permitted Injection PSI: Actual PSI: 1650 Test Reason: 5-year Test Test Result: F Repair Due: 7/11/2010	_00_00
Test Date: 4/7/2010 Permitted Injection PSI: Actual PSI: 1650 Test Reason: 5-year Test Test Result: F Repair Due: 7/11/2010	
Test Reason: 5-year Test Test Result: F Repair Due: 7/11/2010	, 1 6
Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE:	
Comments on MIT: Leak from intermediate string as soon as we started to pressure up.	
FREN OIL COMPANY No.007 30-015-05255-	.00_00
Active Injection - (All Types) N-19-17S-3	
Test Date: 4/6/2010 Permitted Injection PSI: Actual PSI:	
Test Reason: 5-year Test Test Result: F Repair Due: 7/10/2010	
Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE:	
Comments on MIT: Well will not hold pressure	
TURNER B No.051 30-015-05298-	00-00
Active Injection - (All Types) I-20-17S-3	1E
Test Date: 4/21/2010 Permitted Injection PSI: Actual PSI: 1790	
Test Reason: 5-year Test Test Result: F Repair Due: 7/25/2010	
Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE: Comments on MIT: Just as well was pressured up, fluid started coming outside of casing.	

Active Injection - (All Types)

FAIL TYPE: Other Internal Failure

Permitted Injection PSI:

Test Result:

30-015-05473-00-00

J-30-17S-31E

1700

7/10/2010

Actual PSI:

Repair Due:

FAIL CAUSE:

TURNER A No.035

30-015-20097-00-00 Active Injection - (All Types) H-19-17S-31E

Test Date: 4/7/2010 Permitted Injection PS1:
Test Reason: 5-year Test Test Result: F

Repair Due: 7/11/2010

Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE:

Comments on MIT: Well will not hold pressure

J L KEEL B No.032

30-015-24694-00-00

30-015-29001-00-00

Active Injection - (All Types) B-6-17S-31E

Actual PS1:

Test Date: 4/13/2010 Permitted Injection PSI: Actual PSI: 1780

Test Reason: 5-year Test Test Result: F Repair Due: 7/17/2010

Test Type: Std. Annulus Pres. Test FAIL TYPE: Operational Violation FAIL CAUSE:

Comments on MIT: Continuous flow of fluid from the casing.

J L KEEL B No.034

30-015-25447-00-00

Active Injection - (All Types) H-6-17S-31E

Test Date: 4/13/2010 Permitted Injection PSI: Actual PSI: 1900

Test Reason: 5-year Test Test Result: F Repair Due: 7/17/2010

Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE:

Comments on MIT: Well will not hold pressure

J L KEEL B No.038

30-015-25919-00-00

Active Injection - (All Types) I-6-17S-31E

Test Date: 4/13/2010 Permitted Injection PSI: Actual PSI: 1840

Test Reason: 5-year Test Test Result: F Repair Due: 7/17/2010

Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE:

Comments on MIT: Well will not hold pressure

J L KEEL B No.037

30-015-25934-00-00

Active Injection - (All Types) E-5-17S-31E

Test Date: 4/13/2010 Permitted Injection PSI: Actual PSI: 1900

Test Reason: 5-year Test Test Result: F Repair Due: 7/17/2010

Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE:

Comments on MIT: Well will not hold pressure

J L KEEL B No.077

30-015-28279-00-00

Active Injection - (All Types) H-8-17S-31E

Test Date: 4/21/2010 Permitted Injection PSI: Actual PSI: 1650
Test Reason: Annual IMIT Test Result: F Repair Due: 7/25/2010

Test Type: Bradenhead Test FAIL TYPE: Other Internal Failure FAIL CAUSE:

Comments on MIT: Blow of fluid from casing

TURNER A No.058

Active Injection - (All Types) O-18-17S-31E

Test Date: 4/7/2010 Permitted Injection PSI: Actual PSI:

Test Reason: 5-year Test Test Result: F Repair Due: 7/11/2010

Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE:

Comments on MIT: 300 PSI on casing when hooked on. Bleed down to 60 psi and no further. Closed valve and pressure

started building back up on casing.

April 22, 2010 Page 4

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,

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.