

## NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON** 

Governor

Joanna Prukop Cabinet Secretary Lori Wrotenbery
Director
Oil Conservation Division

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

16-Mar-04

DEVON ENERGY PRODUCTION COMPANY, LP 20 N BROADWAY STE 1500 OKLAHOMA CITY OK 73102-0000

## NOTICE 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  |   |  |                            |  |
|---|---|--|----------------------------|--|
| WEST RED LAKE UNIT No.017  Active Injection - (All Types)  Test Date: 3/16/2004 2:22:24 PM Permitted Injection PSI: Actual PSI: |   |  |                            | <b>30-015-00788-00-00</b><br>M-5-18S-27E |
| Test Reason: Test Type: Comments on   | Annual IMIT<br>Bradenhead Test<br>MIT: Well must be shut-in per | Test Result: F FAIL TYPE: No Company Rep to Witn nding reschedule. | Repair Due:<br>FAIL CAUSE: | 5/31/2004                                |
| PATON FEDE  | 3/16/2004 2:19:46 PM  | Active Injection - (All Types) Permitted Injection PSI:            | Actual PSI:                | <b>30-015-00800-00-00</b><br>N-6-18S-27E |
| Test Reason:<br>Test Type:<br>Comments on l   | Annual IMIT<br>Bradenhead Test                                  | Test Result: F FAIL TYPE: No Company Rep to Witn nding reschedule. | Repair Due:<br>FAIL CAUSE: | 5/31/2004                                |
| WEST RED L Test Date:   | AKE UNIT No.013  3/16/2004 2:17:53 PM                           | Active Injection - (All Types) Permitted Injection PSI:            | Actual PSI:                | <b>30-015-00804-00-00</b><br>A-7-18S-27E |
| Test Reason:<br>Test Type:<br>Comments on l   | Annual IMIT<br>Bradenhead Test                                  | Test Result: F FAIL TYPE: No Company Rep to Witn                   | Repair Due:<br>FAIL CAUSE: | 5/31/2004                                |

30-015-00805-00-00 WEST RED LAKE UNIT No.007 Active Injection - (All Types) B-7-18S-27E Actual PSI: **Permitted Injection PSI:** Test Date: 3/16/2004 2:17:03 PM Test Result: Repair Due: Test Reason: **Annual IMIT** 5/31/2004 FAIL TYPE: No Company Rep to Witn **FAIL CAUSE:** Test Type: **Bradenhead Test** Well must be shut-in pending reschedule. Comments on MIT: WEST RED LAKE UNIT No.008 30-015-00806-00-00 Active Injection - (All Types) G-7-18S-27E Actual PSI: Test Date: 3/16/2004 2:16:10 PM **Permitted Injection PSI:** Test Reason: Test Result. Repair Due: **Annual IMIT** 5/31/2004 Test Type: FAIL TYPE: No Company Rep to Witn Bradenhead Test FAIL CAUSE: Comments on MIT: Well must be shut-in pending reschedule. WEST RED LAKE UNIT No.025 30-015-00819-00-00 Active Injection - (All Types) A-8-18S-27E Actual PSI: Test Date: Permitted Injection PSI: 3/16/2004 2:14:05 PM Annual IMIT Test Reason: Test Result: Repair Due: 5/31/2004 Test Type: FAIL TYPE: No Company Rep to Witn FAIL CAUSE: **Bradenhead Test** Well must be shut-in pending reschedule. Comments on MIT: WEST RED LAKE UNIT No.026 30-015-00821-00-00 Active Injection - (All Types) I-8-18S-27E Test Date: **Permitted Injection PSI:** Actual PSI: 3/16/2004 2:03:51 PM Test Reason: **Annual IMIT** Test Result: Repair Due: 5/31/2004 FAIL TYPE: No Company Rep to Witn Test Type: **FAIL CAUSE:** Bradenhead Test Comments on MIT: Well must be shut-in pending reschedule. WEST RED LAKE UNIT No.019 30-015-00826-00-00 Active Injection - (All Types) E-8-18S-27E **Actual PSI:** Test Date: 3/16/2004 2:10:08 PM **Permitted Injection PSI:** Test Reason: Test Result: Repair Due: **Annual IMIT** 5/31/2004 Test Type: FAIL TYPE: No Company Rep to Witn **FAIL CAUSE:** Bradenhead Test Comments on MIT: Well must be shut-in pending reschedule. WEST RED LAKE UNIT No.018 30-015-00828-00-00 Active Injection - (All Types) D-8-18S-27E Test Date: 3/16/2004 2:11:09 PM **Permitted Injection PSI:** Actual PSI: Test Reason: Test Result: Repair Due: Annual IMIT F 5/31/2004 Test Type: **Bradenhead Test** FAIL TYPE: No Company Rep to Witn FAIL CAUSE: Well must be shut-in pending reschedule. Comments on MIT: WEST RED LAKE UNIT No.015 30-015-10174-00-00 Active Injection - (All Types) H-7-18S-27E Actual PSI: Test Date: Permitted Injection PSI: 3/16/2004 2:15:10 PM Test Reason: Test Result: **Annual IMIT** Repair Due: 5/31/2004 Test Type: FAIL TYPE: No Company Rep to Witn FAIL CAUSE: **Bradenhead Test** Well must be shut-in pending reschedule. Comments on MIT: WEST RED LAKE UNIT No.050 30-015-26428-00-00

Comments on MIT: Well must be shut-in pending reschedule.

Test Result:

Permitted Injection PSI:

Test Date:

Test Type:

Test Reason:

3/16/2004 2:12:05 PM

**Annual IMIT** 

**Bradenhead Test** 

Active Injection - (All Types)

FAIL TYPE: No Company Rep to Witn

C-8-18S-27E

5/31/2004

Actual PSI:

Repair Due:

**FAIL CAUSE:** 

WEST RED LAKE UNIT No.035 30-015-27473-00-00 Active Injection - (All Types) D-9-18S-27E 3/16/2004 1:57:49 PM Permitted Injection PSI: Actual PSI: **Test Date:** Test Reason: **Annual IMIT** Test Result: Repair Due: 5/31/2004 FAIL TYPE: No Company Rep to Witn **FAIL CAUSE: Test Type:** Bradenhead Test Comments on MIT: Well must be shut-in pending reschedule. WEST RED LAKE UNIT No.036 30-015-27474-00-00 Active Injection - (All Types) H-8-18S-27E Actual PSI: **Permitted Injection PSI: Test Date:** 3/16/2004 2:04:50 PM Test Reason: Test Desnite Repair Due: 5/31/2004 **Annual IMIT** FAIL TYPE: No Company Rep to Witn **FAIL CAUSE:** Test Type: **Bradenhead Test** Comments on MIT: Well must be shut-in pending reschedule. WEST RED LAKE UNIT No.044 30-015-28444-00-00 N-5-18S-27E Active Injection - (All Types) Actual PSI: **Test Date: Permitted Injection PSI:** 3/16/2004 2:21:36 PM Test Reason: Test Result: Repair Due: 5/31/2004 **Annual IMIT** Test Type: FAIL TYPE: No Company Rep to Witn FAIL CAUSE: Bradenhead Test Well must be shut-in pending reschedule. WEST RED LAKE UNIT No.047 30-015-28471-00-00 Active Injection - (All Types) G-8-18S-27E **Permitted Injection PSI:** Actual PSI: **Test Date:** 3/16/2004 2:07:59 PM Test Result: Repair Due: 5/31/2004 Test Reason: **Annual IMIT** Test Type: FAIL TYPE: No Company Rep to Witn FAIL CAUSE: Bradenhead Test Well must be shut-in pending reschedule. Comments on MIT: 30-015-28539-00-00 WEST RED LAKE UNIT No.057 Active Injection - (All Types) P-6-18S-27E Permitted Injection PSI: Actual PSI: Test Date: 3/16/2004 2:18:52 PM Test Reason: **Annual IMIT** Test Result: Repair Due: 5/31/2004 FAIL CAUSE: FAIL TYPE: No Company Rep to Witn Test Type: Bradenhead Test Well must be shut-in pending reschedule. **Comments on MIT:** 30-015-28564-00-00 **WEST RED LAKE UNIT No.043** 7-4-18S-27E Active Injection - (All Types) Actual PSI: Test Date: **Permitted Injection PSI:** 3/16/2004 2:23:16 PM Test Result: Repair Due: Test Reason: **Annual IMIT** 5/31/2004 F FAIL TYPE: No Company Rep to Witn FAIL CAUSE: Test Type: Bradenhead Test Comments on MIT: Well must be shut-in pending reschedule. WEST RED LAKE UNIT No.061 30-015-28709-00-00 Active Injection - (All Types) C-9-18S-27E Actual PSI: Test Date: **Permitted Injection PSI:** 3/16/2004 2:02:30 PM Test Reason: Test Result: Repair Due: **Annual IMIT** 5/31/2004 Test Type: FAIL TYPE: No Company Rep to Witn FAIL CAUSE: **Bradenhead Test** Comments on MIT: Well must be shut-in pending reschedule. WEST RED LAKE UNIT No.063 30-015-28733-00-00 Active Injection - (All Types) H-8-18S-27E **Test Date: Permitted Injection PSI:** Actual PSI: 3/16/2004 2:05:58 PM Test Reason: **Annual IMIT** Test Result: Repair Due: 5/31/2004 FAIL TYPE: No Company Rep to Witn Test Type: Bradenhead Test **FAIL CAUSE:** Well must be shut-in pending reschedule. Comments on MIT:

WEST RED LAKE UNIT No.062

30-015-28734-00-00 D-9-18S-27E

Active Injection - (All Types)

Test Date:

3/16/2004 1:59:35 PM

**Permitted Injection PSI:** 

Actual PSI:

Test Reason:

**Annual IMIT** 

**Test Result:** 

Repair Due:

Test Type:

Bradenhead Test

FAIL TYPE: No Company Rep to Witn

**FAIL CAUSE:** 

Comments on MIT:

Well must be shut-in pending reschedule.

WEST RED LAKE UNIT No.060

Active Injection - (All Types)

30-015-28781-00-00 N-5-18S-27E

Test Date:

3/16/2004 2:20:37 PM

**Permitted Injection PSI:** 

Actual PSI:

Test Reason:

**Annual IMIT** 

**Test Result:** 

Repair Due:

5/31/2004

Test Type:

5/31/2004

Bradenhead Test

FAIL TYPE: No Company Rep to Witn

**FAIL CAUSE:** 

Well must be shut-in pending reschedule. Comments on MIT:

WEST RED LAKE UNIT No.071

Active Injection - (All Types)

30-015-28940-00-00 B-8-18S-27E

Test Date:

3/16/2004 2:13:11 PM

**Permitted Injection PSI:** 

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

5/31/2004

Test Type:

Bradenhead Test

FAIL TYPE: No Company Rep to Witn

FAIL CAUSE:

Well must be shut-in pending reschedule. Comments on MIT:

WEST RED LAKE UNIT No.072

Active Injection - (All Types)

30-015-28941-00-00 F-8-18S-27E

Test Date:

3/16/2004 2:09:02 PM

**Permitted Injection PSI:** 

**Actual PSI:** 

Test Reason:

**Annual IMIT** 

Test Result:

5/31/2004

Test Type:

Bradenhead Test

FAIL TYPE: No Company Rep to Witn

Repair Due: FAIL CAUSE:

Comments on MIT: Well must be shut-in pending reschedule.

WEST RED LAKE UNIT No.074

Active Injection - (All Types)

30-015-28943-00-00

Test Date:

3/16/2004 2:07:01 PM

Actual PSI:

G-8-18S-27E

Test Reason:

Annual IMIT

**Permitted Injection PSI:** 

Test Result:

Repair Due:

5/31/2004

Test Type:

Bradenhead Test

FAIL TYPE: No Company Rep to Witn FAIL CAUSE:

Comments on MIT:

Well must be shut-in pending reschedule.

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.

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.