State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

John Bemis Cabinet Secretary

Brett F. Woods, Ph.D. Deputy Cabinet Secretary Jami Bailey Division Director Oil Conservation Division



Response Required - Deadline Enclosed

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

19-Mar-13

COG OPERATING LLC ONE CONCHO CENTER 600 W. ILLINOIS AVE MIDLAND TX 79701

LETTER OF VIOLATION and SHUT-IN DIRECTIVE **Failed Mechanical Integrity Test**

Repair Due:

FAIL CAUSE:

6/21/2013

Dear Operator:

Test Type:

Test Reason:

Annual IMIT

Bradenhead Test

Comments on MIT:

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

	MECHANIC	al integniti test detail s	ECHON	
DODD FEDERAL UNIT No.027		•	30-015-02978-00-00	
		Active Injection - (All Types)		C-14-17S-29E
Test Date:	3/18/2013	Permitted Injection PSI: Test Result:	Actual PSI:	. 0
Test Reason:	5-year Test	Test Result: F	Repair Due:	6/21/2013
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:	
Comments on	MIT: Well will not hold press	sure		
RJ UNIT No.119			30-015-03146-00-00	
		Active Injection - (All Types)		O-27-17S-29E
Test Date:	3/18/2013	Permitted Injection PSI:	Actual PSI:	
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	6/21/2013
Test Type:	Bradenhead Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:	•
Comments on l	MIT: Operator reports well w	ill not pass an mit test. Test not run.	*	,
G J WEST CO	OP UNIT No.001		30-015-03176-00-00	
		Active Injection - (All Types)		M-28-17S-29E
Test Date:	3/18/2013	Permitted Injection PSI:	Actual PSI:	

811 South First St. • Artesia, New Mexico 88210 Phone (575) 748-1283 - Fax (575) 748-9720 - www.emnrd.state.nm.us

Operator reports well will not pass

FAIL TYPE: Other Internal Failure

Test Result:

NEW MEXICO E O STATE COM No.001

30-015-25077-00-00

Active Salt Water Disposal Well

Active Salt Water Disposal Well

E-20-17S-29E

Test Date:

3/19/2013

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

6/22/2013

FAIL CAUSE:

Comments on MIT:

Blow of fluid from casing. Hooked up truck to bleed off, shut in valve and already had fluid when re-

OXY SPUMONI STATE No.001

30-015-33089-00-00 P-16-17S-31E

Test Date:

3/18/2013

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due: 6/21/2013

Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: Operator reports well will not pass test. Test not run.

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,

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.