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"

26-Apr-16

LINN OPERATING, INC.

600 TRAVIS STREET SUITE 4900 HOUSTON TX 77002-7002

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.

H E WEST B No.026 30-015-05060-00-00 Active Injection - (All Types) I-3-17S-31E **Permitted Injection PSI: Test Date:** Actual PSI: 4/12/2016 160 Test Reason: Test Result: 5-year Test Repair Due: 7/16/2016 F **Test Type:** FAIL TYPE: Other Internal Failure Std. Annulus Pres. Test FAIL CAUSE: Comments on MIT: Well will not hold pressure. 4 attempts to pressure up. J L KEEL B No.007 30-015-05108-00-00 Active Injection - (All Types) C-8-17S-31E **Permitted Injection PSI:** Actual PSI: **Test Date:** 4/11/2016 1380 Test Result: Test Reason: 5-year Test F Repair Due: 7/15/2016 FAIL TYPE: Other Internal Failure Test Type: Std. Annulus Pres. Test FAIL CAUSE: Comments on MIT: Well will not hold pressure. After dumping in 20 bbls, well went on vacuum.

MECHANICAL INTEGRITY TEST DETAIL SECTION

J L KEEL B	No.012	Active Injection - (All Types)		30-015-05111-00-00 A-8-17S-31E
Test Date:	4/11/2016	Permitted Injection PSI:	Actual PSI:	
Test Reason:		Test Result: F	Repair Due:	7/15/2016
Test Type: Comments or	Std. Annulus Pres. Test MIT: Well will not hold pre	FAIL TYPE: Other Internal Failure ssure.	FAIL CAUSE:	:
SKELLY UN	IT No.063			30-015-05317-00-00
		Active Injection - (All Types)		E-21-17S-31E
Test Date:	4/12/2016	Permitted Injection PSI:	Actual PSI:	1340
Test Reason:	- ,	Test Result: F	Repair Due:	7/16/2016
Test Type: Comments on	Std. Annulus Pres. Test MIT: Well will not hold pres	FAIL TYPE: Other Internal Failure	FAIL CAUSE:	:
SKELLY UN	IT No.075			30-015-05333-00-00
		Active Injection - (All Types)		N-21-178-31E
Test Date:	4/25/2016	Permitted Injection PSI:	Actual PSI:	
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	7/29/2016
Test Type:	Bradenhead Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:	
Comments on	MIT: No guage on tubing. C	continuous flow from casing.		
SKELLY UNI	T No.052			30-015-05345-00-00
		Active Injection - (All Types)		J-22-17S-31E
Test Date:	4/12/2016	Permitted Injection PSI:	Actual PSI:	1260
Test Reason:	5-year Test	Test Result: F	Repair Due:	7/16/2016
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:	
Comments on	MIT: Well would not pressur	e-up. Took 12 bbls to load.	•	
SKELLY UNI	T No.088			30-015-05426-00-00
		Active Injection - (All Types)		A-28-17S-31E
Test Date:	4/25/2016	Permitted Injection PSI:	Actual PSI:	
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	7/29/2016
Test Type:	Bradenhead Test	FAIL TYPE: Permit Violation	FAIL CAUSE:	
Comments on I	MIT: Original failure on 4/8/.	2015. Not repaired from previous failure. Out	t of compliance ov	ver 1 year.
TURNER B No	o.047			30-015-05435-00-00
		Active Injection - (All Types)		B-29-17S-31E
Test Date:	4/12/2016	Permitted Injection PSI:	Actual PSI:	1430
Test Reason:	E			
	5-year Test	Test Result: F	Repair Due:	7/16/2016
Test Type: Comments on I	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	Repair Due: FAIL CAUSE:	7/16/2016
Comments on I	Std. Annulus Pres. Test MIT: Well will not hold press	FAIL TYPE: Other Internal Failure	•	
	Std. Annulus Pres. Test MIT: Well will not hold press	FAIL TYPE: Other Internal Failure ure.	•	30-015-05452-00-00
Comments on I	Std. Annulus Pres. Test MIT: Well will not hold press	FAIL TYPE: Other Internal Failure	•	
Comments on I TURNER B NO	Std. Annulus Pres. Test MIT: Well will not hold press 0.068	FAIL TYPE: Other Internal Failure ure. Active Injection - (All Types)	FAIL CAUSE: Actual PSI:	30-015-05452-00-00
Comments on I TURNER B No Test Date:	Std. Annulus Pres. Test MIT: Well will not hold press 0.068 4/13/2016	FAIL TYPE: Other Internal Failure ure. Active Injection - (All Types) Permitted Injection PSI:	FAIL CAUSE: Actual PSI:	30-015-05452-00-00 P-29-17S-31E
Comments on I TURNER B No Test Date: Test Reason:	Std. Annulus Pres. Test MIT: Well will not hold press 0.068 4/13/2016 Annual IMIT Bradenhead Test MIT: Repaired? Surface is cert	FAIL TYPE: Other Internal Failure ure. Active Injection - (All Types) Permitted Injection PSI: Test Result: F	FAIL CAUSE: Actual PSI: Repair Due: FAIL CAUSE:	30-015-05452-00-00 P-29-17S-31E 7/17/2016
Comments on I TURNER B No Test Date: Test Reason: Test Type:	Std. Annulus Pres. Test MIT: Well will not hold press 5.068 4/13/2016 Annual IMIT Bradenhead Test MIT: Repaired? Surface is cer Original failure on 5/5/2	FAIL TYPE: Other Internal Failure ure. Active Injection - (All Types) Permitted Injection PSI: Test Result: F FAIL TYPE: Permit Violation mented. No paperwork on repair.	FAIL CAUSE: Actual PSI: Repair Due: FAIL CAUSE:	30-015-05452-00-00 P-29-17S-31E 7/17/2016
Comments on N TURNER B No Test Date: Test Reason: Test Type: Comments on N	Std. Annulus Pres. Test MIT: Well will not hold press 5.068 4/13/2016 Annual IMIT Bradenhead Test MIT: Repaired? Surface is cer Original failure on 5/5/2	FAIL TYPE: Other Internal Failure ure. Active Injection - (All Types) Permitted Injection PSI: Test Result: F FAIL TYPE: Permit Violation mented. No paperwork on repair.	FAIL CAUSE: Actual PSI: Repair Due: FAIL CAUSE:	30-015-05452-00-00 P-29-17S-31E 7/17/2016 er 1 year.
Comments on N TURNER B No Test Date: Test Reason: Test Type: Comments on N	Std. Annulus Pres. Test MIT: Well will not hold press 5.068 4/13/2016 Annual IMIT Bradenhead Test MIT: Repaired? Surface is cer Original failure on 5/5/2	FAIL TYPE: Other Internal Failure ure. Active Injection - (All Types) Permitted Injection PSI: Test Result: F FAIL TYPE: Permit Violation mented. No paperwork on repair. 015. Not repaired from previous failure. Out	FAIL CAUSE: Actual PSI: Repair Due: FAIL CAUSE:	30-015-05452-00-00 P-29-17S-31E 7/17/2016 er l year. 30-015-05472-00-00
Comments on N TURNER B No Test Date: Test Reason: Test Type: Comments on N TURNER B No	Std. Annulus Pres. Test MIT: Well will not hold press 5.068 4/13/2016 Annual IMIT Bradenhead Test MIT: Repaired? Surface is cer Original failure on 5/5/2 5.053	FAIL TYPE: Other Internal Failure ure. Active Injection - (All Types) Permitted Injection PSI: Test Result: F FAIL TYPE: Permit Violation mented. No paperwork on repair. 015. Not repaired from previous failure. Out Active Injection - (All Types)	FAIL CAUSE: Actual PSI: Repair Due: FAIL CAUSE: of compliance over Actual PSI:	30-015-05452-00-00 P-29-17S-31E 7/17/2016 er l year. 30-015-05472-00-00
Comments on N TURNER B No Test Date: Test Reason: Test Type: Comments on N TURNER B No Test Date:	Std. Annulus Pres. Test MIT: Well will not hold press 5.068 4/13/2016 Annual IMIT Bradenhead Test MIT: Repaired? Surface is cer Original failure on 5/5/2 5.053 4/13/2016	FAIL TYPE: Other Internal Failure ure. Active Injection - (All Types) Permitted Injection PSI: Test Result: F FAIL TYPE: Permit Violation nented. No paperwork on repair. 015. Not repaired from previous failure. Out Active Injection - (All Types) Permitted Injection PSI:	FAIL CAUSE: Actual PSI: Repair Due: FAIL CAUSE: of compliance over Actual PSI:	30-015-05452-00-00 P-29-17S-31E 7/17/2016 er 1 year. 30-015-05472-00-00 I-30-17S-31E

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NORTH BEN	SON QUEEN UNIT No.025			30-015-10127-00-00		
		Active Injection - (All Types)		N-28-18S-30E		
Test Date:	4/13/2016	Permitted Injection PSI:	Actual PSI:			
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	7/17/2016		
Test Type:	Bradenhead Test	FAIL TYPE: Permit Violation	FAIL CAUSE			
Comments on	MIT: Original failure on 2/17/	2015. Not repaired from previous failure. O	ut of compliance	e over 1 year.		
SKELLY UNI	IT No.107			30-015-20410-00-00		
		Active Injection - (All Types)		E-27-17S-31E		
Test Date:	4/25/2016	Permitted Injection PSI:	Actual PSI:			
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	7/29/2016		
Test Type:	Bradenhead Test	FAIL TYPE: Permit Violation	FAIL CAUSE	:		
Comments on	MIT: Original failure on 4/8/2	015. Not repaired from previous failure. Out	of compliance of	over 1 year.		
RED LAKE U	NIT No.016			30-015-23122-00-00		
		Active Injection - (All Types)		O-25-16S-28E		
Test Date:	4/13/2016	Permitted Injection PSI:	Actual PSI:			
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	7/17/2016		
Test Type:	Bradenhead Test	FAIL TYPE: Permit Violation	FAIL CAUSE:			
Comments on	MIT: Original failure on 2/17/2	2015. Not repaired from previous failure. Ou	it of compliance	over 1 year.		
RED LAKE U	NIT No.012			30-015-24016-00-00		
		Active Injection - (All Types)		I-25-16S-28E		
Test Date:	4/13/2016	Permitted Injection PSI:	Actual PSI:			
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	7/17/2016		
Test Type:	Bradenhead Test	FAIL TYPE: Permit Violation	FAIL CAUSE:			
Comments on		2015. Not repaired from previous failure. Ou				
J L KEEL B N	30-015-25447-00-00					
-		Active Injection - (All Types)		H-6-17S-31E		
Test Date:	4/11/2016	Permitted Injection PSI:	Actual PSI:	1250		
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	7/15/2016		
Test Type:	Bradenhead Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:			
Comments on l	MIT: Took a while to load, but	would not hold pressure.				
J L KEEL B N	o.037	· · · · · · · · · · · · · · · · · · ·	-*	30-015-25934-00-00		
		Active Injection - (All Types)		E-5-17S-31E		
Test Date:	4/11/2016	Permitted Injection PSI:	Actual PSI:	1450		
Test Reason:	5-year Test	Test Result: F	Repair Due:	7/15/2016		
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:			
 Comments on N 		Need to replace gasket and re-test				
TURNER A No	0.057		- <u>, , </u>	30-015-29000-00-00		
		Active Injection - (All Types)		C-19-17S-31E		
Test Date:	4/14/2016	Permitted Injection PSI:	Actual PSI:			
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	7/18/2016		
Test Type:	Bradenhead Test	FAIL TYPE: Permit Violation	FAIL CAUSE:			
Comments on MIT: Original failure on 3/25/2015. Not repaired from previous failure. Out of compliance over 1 year. Part of WFX946 implementation.						
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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

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.