

State of New Mexico  
Energy, Minerals and Natural Resources Department

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**Susana Martinez**  
Governor

**Ken McQueen**  
Cabinet Secretary

**Matthias Sayer**  
Deputy Cabinet Secretary

**David R. Catanach, Division Director**  
Oil Conservation Division



**\*Response Required – Deadline Enclosed\***  
*Underground Injection Control Program*  
*"Protecting Our Underground Sources of Drinking Water"*

24-Mar-17

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

**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***

**BURCH KEELY UNIT No.114**

**30-015-03064-00-00**

	Active Injection - (All Types)	P-23-17S-29E
<b>Test Date:</b>	3/22/2017	<b>Permitted Injection PSI:</b>
<b>Test Reason:</b>	5-year Test	<b>Test Result:</b> F
<b>Test Type:</b>	Std. Annulus Pres. Test	<b>Actual PSI:</b> 0
<b>Comments on MIT:</b>	10 bbls to load, lost 40psi in 5 minutes, retried and fluid came from around tubing.	<b>Repair Due:</b> 6/25/2017
		<b>FAIL TYPE:</b> Other Internal Failure
		<b>FAIL CAUSE:</b>

**BURCH KEELY UNIT No.135**

**30-015-03086-00-00**

	Active Injection - (All Types)	C-25-17S-29E
<b>Test Date:</b>	3/21/2017	<b>Permitted Injection PSI:</b>
<b>Test Reason:</b>	5-year Test	<b>Test Result:</b> F
<b>Test Type:</b>	Std. Annulus Pres. Test	<b>Actual PSI:</b> 0
<b>Comments on MIT:</b>	After building up to 300psi, well would not pressure up. Immediate drop off.	<b>Repair Due:</b> 6/24/2017
		<b>FAIL TYPE:</b> Other Internal Failure
		<b>FAIL CAUSE:</b>

March 24, 2017

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**DURANGO 15 STATE COM No.001**

**30-015-31557-00-00**

	Active Salt Water Disposal Well	D-15-17S-29E
Test Date:	3/22/2017	Permitted Injection PSI:
Test Reason:	5-year Test	Test Result: F
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure
Comments on MIT:	Well will not hold pressure	

**JENKINS B FEDERAL No.013**

**30-015-31560-00-00**

	Active Injection - (All Types)	E-20-17S-30E
Test Date:	3/21/2017	Permitted Injection PSI:
Test Reason:	Annual IMIT	Test Result: F
Test Type:	Bradenhead Test	FAIL TYPE: Other Internal Failure
Comments on MIT:	Well would not pressure-up.	

**LOCO HILLS SWD 35 No.002**

**30-015-37268-00-00**

	Active Salt Water Disposal Well	N-35-17S-30E
Test Date:	3/21/2017	Permitted Injection PSI:
Test Reason:	Annual IMIT	Test Result: F
Test Type:	Bradenhead Test	FAIL TYPE: Other Internal Failure
Comments on MIT:	Informed by Operator - well is shut-in for repairs.	

**LAKEWOOD SWD No.001**

**30-015-40717-00-00**

	Active Salt Water Disposal Well	B-8-19S-26E
Test Date:	3/23/2017	Permitted Injection PSI:
Test Reason:	5-year Test	Test Result: F
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure
Comments on MIT:	Well would not pressure-up.	

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.