

# New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez  
Governor

Brett F. Woods, Ph.D.  
Acting Cabinet Secretary

Daniel Sanchez  
Acting Division Director  
Oil Conservation Division



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

Mailed: 3-1-2011  
DJA

24-Feb-11

CBS OPERATING CORP  
PO BOX 2236  
MIDLAND TX 79702

30-015-20536

LOVNO. 02-09-195

## 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

#### NORTH SQUARE LAKE UNIT No.185

Active Injection - (All Types)

30-015-10863-00-00  
A-36-16S-30E

Test Date:	2/21/2011	Permitted Injection PSI:		Actual PSI:	
Test Reason:	Annual IMIT	Test Result:	F	Repair Due:	5/27/2011
Test Type:	Bradenhead Test	FAIL TYPE:	Other Internal Failure	FAIL CAUSE:	
Comments on MIT:	Operator reports tubing out of hole. While they were working on well, packer got stuck half way down. Unable to test.				

#### LOCO HILLS A FEDERAL No.002

Active Injection - (All Types)

30-015-20536-00-00  
N-10-17S-30E

Test Date:	2/21/2011	Permitted Injection PSI:		Actual PSI:	1700
Test Reason:	5-year Test	Test Result:	F	Repair Due:	5/27/2011
Test Type:	Std. Annulus Pres. Test	FAIL TYPE:	Other Internal Failure	FAIL CAUSE:	
Comments on MIT:	Water started coming out of ground around casing.				

Oil Conservation Division  
1301 W. Grand Avenue • Artesia, New Mexico 88210  
Phone (575) 748-1283 • Fax (575) 748-9720 • [www.emnrd.state.nm.us/OCD](http://www.emnrd.state.nm.us/OCD)



**LOCO HILLS B FEDERAL No.001**

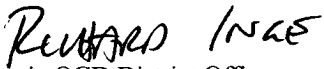
**30-015-20537-00-00**  
P-9-17S-30E

**Active Injection - (All Types)**

<b>Test Date:</b> 2/21/2011	<b>Permitted Injection PSI:</b>	<b>Actual PSI:</b>
<b>Test Reason:</b> 5-year Test	<b>Test Result:</b> F	<b>Repair Due:</b> 5/27/2011
<b>Test Type:</b> Std. Annulus Pres. Test	<b>FAIL TYPE:</b> Operational Violation	<b>FAIL CAUSE:</b>
<b>Comments on MIT:</b> Unable to test. Gas zone perms above injection zone. Operator has not been reporting production since 1996. Advised operator to either squeeze perms if not producing, or set packers to test casing integrity.		

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