

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

Susana Martinez Governor

John H. Bemis Cabinet Secretary

Response Required - Deadline Enclosed

Conderground Insection Control Program "Principles Car Underground Sources of Drinking Voler" Jami Bailey Division Director Oil Conversation Division

07-Jul-11

DORAL ENERGY CORP. 22610 US HIGHWAY 281, N. SUITE 218 SAN ANTONIO TX 78258--756

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, <u>the well(s) must be shut-in</u> <u>immediately</u> 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

MILLER FED	30-005-20530-00-00			
		Active Salt Water Dispos	sal Well	M-34-7S-31E
Test Date:	7/7/2011	Permitted Injection PSI:	Actual PSI:	
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	10/10/2011
Test Type:	Bradenhead Test	FAIL TYPE: Tubing	FAIL CAUSE:	
Comments on I		IT FAILED. NEED TO REPAIR AN CAN RETURN TO INJ. THIS IS IST		
HAHN FEDEF	30-005-20532-00-00			
		Active Salt Water Dispos	sal Well	K-27-78-31E
Test Date:	7/7/2011	Permitted Injection PSI:	Actual PSI:	
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	10/10/2011
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Equipment - Specil	y in Co FAIL CAUSE:	
Comments on I		VABLE TO RUN MIT/PRESSURE T PAIR AND RETURN TO INJ, T/A OF		

Oil Conservation Division 1625 N. French Drive 1 Hobbs, New Mexico 88240 Phone 575-393-6161 Fax 575-393-0720 http://www.emrid.state.nm.us

TOM 36 STATE No.001

		Active Salt Water Disposa	1 Well	A-36-78-31E
Test Date:	7/7/2011	Permitted Injection PSI:	Actual PSI:	
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	10/10/2011
Test Type:	Bradenhead Test	FAIL TYPE: Tubing	FAIL CAUSE:	
Comments on	MIT: RULE 19/15.26.11. COMPLIANCE.	FAILED BHT. STRONG VAC ON PROE	OCSG. THIS IS 1ST L	ETTER OF NON-
WATTAM FE	DERAL No.006			30-005-20814-00-00
		Active Salt Water Disposa	A-7-8S-31E	
Test Date:	7/7/2011	Permitted Injection PSI:	Actual PSI:	
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	10/10/2011
Test Type:	Std. Annulus Pres Test	FAIL TYPE: Tubing	FAIL CAUSE:	
Comments on	MIT: RULE 19 15 26 11	FAILED MIT/ PRESSURE TEST. BARR	Y LEE REPORTED TH	HAT WELL WOULD

30-005-20686-00-00

NOT PT. SCHEDULED FOR REPAIRS 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

Sincerely.

PENALTIES for your violation of OCD rules 2* * COMPLIANCE OFFICER

Hobbs 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

> Oil Conservation Division * 1625 N. French Drive 3: Hobbs, New Mexico 88240 Phone 575-393-6161 * Fax 575-393-0720 . http://www.emnid.state.nm.us

EMNRD OIL CONSERVATION DIVISION 1625 N FRENCH DRIVE HOBBS NM 88240



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