exico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

John H. Bemis

Cabinet Secretary-Designate

HOBBS OCD

Jami Bailey Division Director

Oil Conservation Division

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

SFP 28 2011

RECEIVED

Response Required – Deadline Enclosed

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

28-Sep-11

FULFER OIL & CATTLE LLC

P.O. BOX 1224 JAL NM 88252-

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

Harrison Federal No.002

Active Salt Water Disposal Well

30-025-11690-00-00 I-22-25S-37E

Test Date:

9/28/2011

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Repair Due:

1/1/2012

Test Type:

Test Result:

Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT:

FAILED PT; WOULD NOT HOLD PRESSURE; ****OPERATOR IN VIOLATION OF NMOCD

RULE 19.15.26.11****

KIMMY K No.002

Active Salt Water Disposal Well

30-025-26490-00-00 F-29-24S-37E

Test Date:

9/28/2011

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

1/1/2012

Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

NO CHANGE IN STATUS; STRONG PRESSURE ON CASING; FAILED BHT; ***OPERATOR IN

VIOLATION OF NMOCD RULE 19.15.26.11***

September 28, 2011 Page 2

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.

Hobbs OCD DistiFRE

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.

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT Oil Conservation Division 1625 N. French Drive Hobbs, NM 88240



Mailed From 88240

US POSTAGE

FULFER OIL & CATTLE LLC ATTN: GREGG FULFER P.O. BOX 1224 JAL, NM 88252