



# New Mexico Energy, Minerals and Natural Resources Department

**Susana Martinez**  
Governor

**HOBBS OCD**

**JAN 31 2012**

**RECEIVED**

**John H. Bemis**  
Cabinet Secretary - Designee

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

**Jami Bailey**  
Division Director  
Oil Conservation Division



**\*Response Required – Deadline Enclosed\***

*Underground Injection Control Program*

*"Protecting Our Underground Sources of Drinking Water"*

31-Jan-12

**SEELY OIL CO**  
815 W 10TH ST  
FORT WORTH TX 76102-

**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**

**E-K QUEEN UNIT No.013**

Expired TA Injection - (All Types)

**30-025-01632-00-00**  
G-24-18S-33E

Test Date: 1/27/2012

Permitted Injection PSI:

Actual PSI:

Test Reason: TA Status Test

Test Result: F

Repair Due: 5/1/2012

Test Type: Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: WHILE LOADING WELL FOR PRESSURE TEST, OIL COMMENCED ON SURFACE CASING;  
FAILED PT ATTEMPT FOR TA STATUS REINSTATEMENT; \*\*\*\*OPERATOR IN VIOLATION OF  
NMOC RULE 19.15.26.11 \*\*\*\*

**E-K QUEEN UNIT No.611**

Active Injection - (All Types)

**30-025-01644-00-00**  
I-24-18S-33E

Test Date: 1/26/2012

Permitted Injection PSI:

Actual PSI:

Test Reason: Annual IMIT

Test Result: F

Repair Due: 4/30/2012

Test Type: Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: COMMUNICATION BETWEEN TUBING AND CASING \*\*\*\*OPERATOR IN VIOLATION OF  
NMOC RULE 19.15.26.11 \*\*\*\*

Oil Conservation Division  
1625 N. French Drive • Hobbs, New Mexico 88240  
Phone (575) 393-6161 • Fax (575) 393-0720 • [www.emnrd.state.nm.us/OCD](http://www.emnrd.state.nm.us/OCD)



**JAN 31 2012**

**E-K PENROSE SAND UNIT No.122****30-025-02345-00-00**

Active Injection - (All Types)

K-19-18S-34E

Test Date: 1/27/2012

Permitted Injection PSI:

Actual PSI:

Test Reason: 5-year Test

Test Result: F

Repair Due: 5/1/2012

Test Type: Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: WOULD NOT LOAD TO PRESSURE TEST; \*\*\*OPERATOR IN VIOLATION OF NMOC Rule 19.15.26.11\*\*\*\*

**CENTRAL EK QUEEN UNIT No.012****30-025-34048-00-00**

Active Injection - (All Types)

L-8-18S-34E

Test Date: 1/26/2012

Permitted Injection PSI:

Actual PSI:

Test Reason: Annual IMIT

Test Result: F

Repair Due: 4/30/2012

Test Type: Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: COMMUNICATION BETWEEN TUBING AND CASING; \*\*\*OPERATOR IN VIOLATION OF NMOC Rule 19.15.26.11\*\*\*\*

**CENTRAL EK QUEEN UNIT No.013****30-025-34181-00-00**

Active Injection - (All Types)

N-7-18S-34E

Test Date: 1/26/2012

Permitted Injection PSI:

Actual PSI:

Test Reason: Annual IMIT

Test Result: F

Repair Due: 4/30/2012

Test Type: Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: SALT WATER ON SURFACE DID NOT BLEED DOWN \*\*\*\*OPERATOR IN VIOLATION OF NMOC Rule 19.15.26.11\*\*\*\*

**E-K PENROSE SAND UNIT No.701****30-025-37572-00-00**

Active Injection - (All Types)

D-30-18S-34E

Test Date: 1/27/2012

Permitted Injection PSI:

Actual PSI:

Test Reason: 5-year Test

Test Result: F

Repair Due: 5/1/2012

Test Type: Std. Annulus Pres. Test

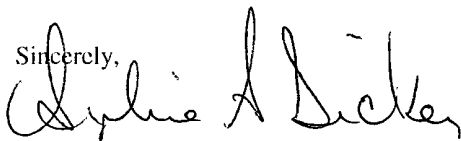
FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: WOULD NOT LOAD TO PRESSURE TEST; CASING WENT ON STRONG VACUUM AFTER ATTEMPT TO PRESSURE TEST; \*\*\*OPERATOR IN VIOLATION OF NMOC Rule 19.15.26.11\*\*\*\*

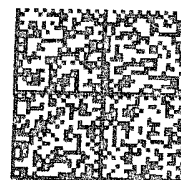
In the event that a satisfactory response is not received to this letter of direction by the "Repair Due:" date shown above, or if the well(s) are not immediately shut-in, further enforcement will occur. Such enforcement may include this office applying to the Division for an order summoning you to a 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,

Hobbs OCD District Office  
**COMPLIANCE OFFICER**

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.

EMNRD  
OIL CONSERVATION DIVISION  
1625 N FRENCH DRIVE  
HOBBS NM 88240



HASLER	015H14 150977	US POSTAGE
	<b>\$0.45</b>	
	01/31/12	
	Mailed From 88240	

Seely Oil Company  
815 W. 10th Street  
Fort Worth, TX 76102