State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

John H. Bemis Cabinet Secretary

Brett F. Woods, Ph.D. **Deputy Cabinet Secretary** Jami Bailey Division Director Oil Conservation Division HOBBS OCD

APR 0 4 2012

RECEIVED



Response Required - Deadline Enclosed

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

03-Apr-12

CONOCOPHILLIPS COMPANY 3300 N A STREET BLDG 6 #247 MIDLAND TX 79710-0000

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

VACUUM ABO UNIT No.018

Active Injection - (All Types)

30-025-03053-00-00

K-4-18S-35E

Test Date:

3/9/2012

Permitted Injection PSI:

Actual PSI:

6/12/2012

Test Reason: Test Type:

5-year Test

Test Result:

Repair Due:

Std. Annulus Pres. Test

Comments on MIT:

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

UNABLE TO PRESSURE TEST; WELL WOULD NOT PRESSURE UP; FAILED PRESSURE TEST; ***OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11****

EAST VACUUM (GSA) UNIT No.009

Active Injection - (All Types)

30-025-26518-00-00 O-32-17S-35E

Test Date:

3/6/2012

Permitted Injection PSI:

Actual PSI:

6/9/2012 Repair Due:

Test Reason: Test Type:

5-year Test

Test Result:

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT:

Std. Annulus Pres. Test PRODUCTION CASING DID NOT BLEED DOWN; ***UNABLE TO PERFORM PRESSURE TEST DUE TO CASING PRESSURE**** ***OPERATOR IN VIOLATION OF NMOCD 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

April 5, 2012 Page 2

EAST VACUUM (GSA) UNIT No.012

30-025-30280-00-00

Active Injection - (All Types)

L-32-17S-35E

Test Date:

3/7/2012

Permitted Injection PSI:

Actual PSI:

6/10/2012

Test Reason: Test Type:

5-year Test

Test Result:

Repair Due:

Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT:

PRESSURED UP ON CASING IMMEDIATELY DROPPED PRESSURE TO 0 WITHIN 15 SECONDS;

OPERATOR IN VIOLATION OF NMOCD 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.

Hobbs OCD District Office

GOMPLIANCE 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



CONOCOPHILLIP'S COMPANY ATTN: REGULATORY COMPLIANCE 3300 N. 'A' STR. BLDG. 6 #247 MIDLAND, TX 79710