State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

John H. Bemis Cabinet Secretary

Jami Bailey, Division Director Oil Conservation Division



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

Response Required - Deadline Enclosed

Underground Injection Control Program "Protecting Our Underground Sources of Drinking

12-Apr-13

XTO ENERGY, INC.

ATTN: STEPHANIE RABADUE

200 N. LORAINE

STE. 800

MIDLAND, TX 79701

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

EUNICE MONUMENT SOUTH UNIT B No.853

30-025-04198-00-00 A-10-20S-36E

6/22/2013

Active Injection - (All Types)

3/19/2013 Test Date: Permitted Injection PSI:

Actual PSI:

Test Reason: Annual IMIT Test Result: Repair Due:

Test Type: Bradenhead Test FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: PER BHT SURVEY 3/19/2013 OPERATOR REPORTED 580# ON CASING - BLED TO ZERO IN LESS THAN 10 SECS; OPERATOR ALSO STATES A WATER DRIP ON CASING.

OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11 NOTE IF CASING DOES NOT COMPLETELY BLEED DOWN TEST IS CONSIDERED A FAILURE***PLEASE SUBMIT

PRESSURE TEST FOR JUSTIFICATION OF INTEGRITY.

EUNICE MONUMENT SOUTH UNIT No.279

30-025-04581-00-00

Active Injection - (All Types) B-9-21S-36E Test Date: 3/12/2013 Permitted Injection PSI: **Actual PSI:** Annual IMIT Test Reason: Test Result: Repair Due: 6/15/2013

Test Type: Bradenhead Test FAIL TYPE: Other Internal Failure FAIL CAUSE:

THIS WELL FAILED 10/26/2012; NOI C103 APRVD 1/4/2013 TO MONITOR CASING; BHT **Comments on MIT:**

OF 3/12/2013 SHOWS WELL TO HAVE CASING PRESSURE OF 460# **CONTINUOUS

-PRESSURE-BUILD UP ON CASING CONSTITUTES FAILED MECHANICAL -INTEGRITY***OPERATOR-IN-VIOLATION-OF-NMOCD-RULE-19:15:26:11***

EUNICE MONUMENT SOUTH UNIT No.359

30-025-04651-00-00 C-15-21S-36E

Active Injection - (All Types)

Test Date:

3/12/2013

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

6/15/2013

Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT:

BHT FAILUREOPERATOR IN VIOLATION OF NMOCD RULE 19.16.26.11***PRIOR UIC RECORDS SHOW CASING PRESSURE 10/29/2012:

NORTH VACUUM ABO UNIT No.112

Active Injection - (All Types)

30-025-21751-00-00 D-25-17S-34E

Test Date:

3/9/2013

Permitted Injection PSI:

Actual PSI:

Repair Due: 6/12/2013

Test Reason: Test Type:

Annual IMIT

Test Result:

Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT:

BHT FAILUREPER OPERATOR WELL IS DOWN PENDING REPAIRS PER NOI C103

APRVD 4/11/2013; **FOR RECORD**OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11***

NORTH VACUUM ABO UNIT No.213

Active Injection - (All Types)

30-025-23982-00-00 N-23-17S-34E

Test Date:

3/10/2013

Permitted Injection PSI:

Actual PSI:

Test Reason: Test Type:

Annual IMIT

Test Result:

Repair Due:

6/13/2013

Comments on MIT:

Bradenhead Test FAIL TYPE: Other Internal Failure FAIL CAUSE:

***BHT FAILURE**PER NOI C103 APRVD 4/11/2013 OPERATOR STATES WELL IS SHUT

IN PENDING REPAIRS***FOR RECORD*** OPERATOR IS IN VIOLATION OF NMOCD

RULE 19.15.26.11***

EUNICE MONUMENT SOUTH UNIT No.285

30-025-24563-00-00

6/16/2013

Active Injection - (All Types)

D-8-21S-36E

Test Date:

3/13/2013

Permitted Injection PSI:

Actual PSI:

Annual IMIT Test Reason:

Test Result:

Repair Due:

Bradenhead Test Test Type: Comments on MIT:

FAIL TYPE: Other Internal Failure FAIL CAUSE: **BHT FAILURE***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.

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



XTO ENERGY, INC. ATTN: STEPHANIE RABADUE 200 N. LORAINE STE. 800 MIDLAND, TX 79701

