## State of New Mexico Energy, Minerals and Natural Resources Department

**Susana Martinez** 

Governor

HOEBS OCO

APR 2 4 2013

RECEIVED

Jami Bailey, Division Director Oil Conservation Division

**David Martin** 

Cabinet Secretary-Designate

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

\*Response Required - Deadline Enclosed\*

Underground Injection Control Program "Protecting Our Underground Sources of Drinking

24-Apr-13

PPC OPERATING COMPANY LLC 4700 W. SAM HOUSTON PKWY N. STE 140 HOUSTON TX 77041-

> 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**

## W H RHODES B FEDERAL NCT-1 No.008

30-025-12055-00-00

M-26-26S-37E

**Test Date:** 

4/5/2013

Permitted Injection PSI:

**Actual PSI:** 

7/9/2013

Test Reason:

5-year Test

Test Result:

Repair Due: FAIL CAUSE:

Test Type: Comments on MIT:

Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

\*\*FAILED MIT\*\*\*PER OPERATOR NOI C103 SUBMITTAL APPROVED

4/18/2013\*\*\*LETTER OF VIOLATION FOR RECORD ONLY\*\*\* OPERATOR IN VIOLATION OF

Active Injection - (All Types)

NMOCD RULE 19.15.26.11\*\*\*

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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

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



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PPC OPERATING COMPANY LLC. ATTN: REGULATORY DEPT. 4700 W. SAM HOUSTON PRKWY N. STE. 140 HOUSTON, TX 77041