

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

David Martin
Cabinet Secretary-Designate

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

HOBBS OCD
JUN 17 2013
RECEIVED

Jami Bailey, Division Director
Oil Conservation Division



Response Required – Deadline Enclosed
Underground Injection Control Program
"Protecting Our Underground Sources of Drinking"

14-Jun-13

OCCIDENTAL PERMIAN LTD
1017 W STANOLIND ROAD
HOBBS, NM 88240

**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

NORTH HOBBS G/SA UNIT No.121

30-025-05502-00-00
E-25-18S-37E

Approved TA Injection - (All Types)
Test Date: 4/30/2013 Permitted Injection PSI: Actual PSI:
Test Reason: Annual IMIT Test Result: F Repair Due: 8/3/2013
Test Type: Bradenhead Test FAIL TYPE: Other Internal Failure FAIL CAUSE:
Comments on MIT: ***FAILED BHT***2ND YEAR IN A ROW WELL HAS FAILED**OPERATOR HAS NOT
SUBMITTED NOTICE OF INTENT FOR REPAIRS - ***2ND NOTICE OF VIOLATION***
OPERATOR IN VIOLATION OF NMOCDD RULE 19.15.26.11

NORTH HOBBS G/SA UNIT No.221

30-025-07355-00-00
F-19-18S-38E

Active Oil (Producing)
Test Date: 6/3/2013 Permitted Injection PSI: Actual PSI:
Test Reason: Annual IMIT Test Result: F Repair Due: 9/6/2013
Test Type: Bradenhead Test FAIL TYPE: Other Internal Failure FAIL CAUSE:
Comments on MIT: ***FAILED BHT*** PER OPERATOR INTERMEDIATE CASING DID NOT BLEED
DOWN**140# INITIAL PRESSURE ON INTERMEDIATE CASING; **NOTE: OPERATOR
MUST BLEED INTERMEDIATE CASING TO TRUCK TO SEE IF A CONTINUOUS BUILD UP
OCCURS TO VERIFY PROBLEM ***OPERATOR IN VIOLATION OF NMOCDD RULE 19.15.26.11 ***

JUN 17 2013

NORTH HOBBS G/SA UNIT No.422

30-025-26933-00-00
H-25-18S-37E

Active Injection - (All Types)

Test Date: 4/30/2013 Permitted Injection PSI: Actual PSI:
Test Reason: Annual IMIT Test Result: F Repair Due: 8/3/2013
Test Type: Bradenhead Test FAIL TYPE: Other Internal Failure FAIL CAUSE:
Comments on MIT: ***FAILED BHT***PRODUCTION CASING DID NOT BLEED DOWN PER OPERATOR;
OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11

NORTH HOBBS G/SA UNIT No.333

30-025-28955-00-00
J-30-18S-38E

Active Injection - (All Types)

Test Date: 5/3/2013 Permitted Injection PSI: Actual PSI:
Test Reason: Annual IMIT Test Result: F Repair Due: 8/6/2013
Test Type: Bradenhead Test FAIL TYPE: Other Internal Failure FAIL CAUSE:
Comments on MIT: ***FAILED BHT***PER OPERATOR CASING WOULD NOT BLEED DOWN**OPERATOR IN
VIOLATION OF NMOCD RULE 19.15.26.11*** OPERATOR STATES WILL PLACE ON LIST
FOR REPAIRS***NOTE: OPERATOR CALLED IN ON 6/5/2013 FOR NOI OF REPAIRS***

NORTH HOBBS G/SA UNIT No.242

30-025-26832-00-00
N-24-18S-37E

Active Injection - (All Types)

Test Date: 4/29/2013 Permitted Injection PSI: Actual PSI:
Test Reason: Annual IMIT Test Result: F Repair Due: 8/2/2013
Test Type: Bradenhead Test FAIL TYPE: Other Internal Failure FAIL CAUSE:
Comments on MIT: ***FAILED BHT***OPERATOR STATES CASING HAD 451# BLED TO 177#, FLUID
COMMENCED TO SHOW ON CASING, DID NOT BLEED DOWN. ***OPERATOR IN
VIOLATION OF NMOCD RULE 19.15.26.11***

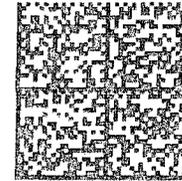
In the event that a satisfactory response is not received to this letter of direction by the "Repair Due:" date shown above, or if the well(s) are not immediately shut-in, further enforcement will occur. Such enforcement may include this office applying to the Division for an order summoning you to a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

Julie A. Dickey
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



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US POSTAGE

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HOBBS, NM 88240