State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

Ken McQueen

Cabinet Secretary Designate

David R. Catanach, Division Director

Oil Conservation Division

Matthias Sayer

Deputy Cabinet Secretary

Response Required - Deadline Enclosed

Underground Injection Control Program

"Protecting Our Underground Sources of Drinking Water"

24-Feb-17

EOR OPERATING COMPANY

777 N. Eldridge Pkwy Suite 150 Houston TX 77079-7079

> 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

MILNESAND UNIT No.182

Active Injection - (All Types)

30-041-00131-00-00

Test Date:

2/24/2017

Permitted Injection PSI:

Actual PSI:

D-18-8S-35E

Test Reason:

Annual IMIT

Test Result:

Test Type:

Repair Due:

5/30/2017

Comments on MIT:

Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

OPERATOR REPORTED MIT-FAILURE. RULE: 19.15.26.11. 3RD LETTER OF VIOLATION

MILNESAND UNIT

No.310

30-041-10059-00-00 F-19-8S-35E

Test Date:

2/24/2017

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Expired TA Injection - (All Types)

Repair Due:

5/30/2017

Test Type:

Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: OPERATOR REPORTED MIT-FAILURE. RULE: 19.15.26.11. 3RD LETTER OF VIOLATION.