State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez Governor

Ken McQueen Cabinet Secretary

Matthias Sayer Deputy Cabinet Secretary Heather Riley Division Director



Response Required - Deadline Enclosed

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

30-May-18

RAM ENERGY LLC

5100 East Skelly Drive Suite 600 Tulsa OK 74135-4135

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, <u>the well(s) must be shut-in</u> <u>immediately</u> 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

WEST DOLLA	30-025-12276-00-00						
		Active Injection - (All Types)		B-31-24S-38E			
Test Date:	5/29/2018	Permitted Injection PSI:	Actual PSI:				
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	9/1/2018			
Test Type:	Bradenhead Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:				
Comments on MIT: BHT-FAILURE. RULE: 19.15.26.11							
WEST DOLLA	30-025-30297-00-00						
		Expired TA Injection - (All Types)		K-32-24S-38E			
Test Date:	5/29/2018	Permitted Injection PSI:	Actual PSI:				
Test Reason:	TA Status Test	Test Result: F	Repair Due:	9/2/2018			
Test Reason: Test Type:	TA Status Test Std. Annulus Pres. Test	Test Result: F FAIL TYPE: Other Internal Failure	Repair Due: FAIL CAUSE:	9/2/2018			

WEST DOLLARHIDE QUEEN SAND UNIT No.148

30-025-30305-00-00 M-32-24S-38E

30-025-30345-00-00

	receive injection (rin 1)pes)		WI-52-2-0-50L			
Test Date: 5/29/2018	Permitted Injection PSI:	Actual PSI:				
Test Reason: Annual IMIT	Test Result: F	Repair Due:	9/1/2018			
Test Type: Bradenhead Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:				
Comments on MIT: BHT-FAILURE. RULE: 19.15.26.11						

Active Injection - (All Types)

WEST DOLLARHIDE QUEEN SAND UNIT No.136

		Active Injection - (All Types)		E-32-24S-38E			
Test Date:	5/29/2018	Permitted Injection PSI:	Actual PSI:				
Test Reason:	5-year Test	Test Result: F	Repair Due:	9/1/2018			
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:				
Comments on MIT: UIC-MIT-FAILURE. WPULD NOT HOLD PRESSURE. 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.

Down 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

> RAM ENERGY LLC Paul Homan 5100 East Skelly Drive Suite 600 Tulsa, OK 74135

