State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

Ken McOueen **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"

20-Jun-18

XTO ENERGY, INC 500 W. ILLINOIS, STE 100 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.872** 30-025-04265-00-00 Active Injection - (All Types) C-14-20S-36E Permitted Injection PSI: **Actual PSI:** Test Date: 6/11/2018 Test Result: Test Reason: Repair Due: 9/14/2018 5-year Test Test Type: FAIL TYPE: Other Internal Failure FAIL CAUSE: Std. Annulus Pres. Test Comments on MIT: UIC-MIT-FAILURE. RULE: 19.15.26.11. WOULD NOT HOLD PRESSURE **EUNICE MONUMENT SOUTH UNIT No.227** 30-025-04502-00-00 Active Injection - (All Types) H-5-21S-36E Test Date: **Permitted Injection PSI: Actual PSI:** 6/13/2018 Test Result: Test Reason: 5-year Test Repair Due: 9/16/2018 Test Type: FAIL TYPE: Other Internal Failure **FAIL CAUSE:** Std. Annulus Pres. Test Comments on MIT: UIC-MIT-FAILURE. RULE:19.15.26.11. WOULD NOT HOLD PRESSURE

EUNICE MONUMENT SOUTH UNIT No.242 30-025-04519-00-00 Active Injection - (All Types) I-5-21S-36E **Test Date: Permitted Injection PSI: Actual PSI:** 6/13/2018 Test Reason: Test Result: 5-year Test Repair Due: 9/16/2018 Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE: Comments on MIT: UIC-MIT-FAILURE. WOULD NOT PRESSURE UP. RULE:19.15.26.11 **EUNICE MONUMENT SOUTH UNIT No.223** 30-025-04530-00-00 Active Injection - (All Types) P-6-21S-36E **Test Date:** Permitted Injection PSI: **Actual PSI:** 6/12/2018 Test Reason: Test Result: 5-year Test Repair Due: 9/15/2018 FAIL TYPE: Other Internal Failure Test Type: Std. Annulus Pres. Test FAIL CAUSE: UIC-MIT-FAILURE, RULE:19.15.26.11, WOULD NOT HOLD PRESSURE. Comments on MIT: **EUNICE MONUMENT SOUTH UNIT No.374** 30-025-04685-00-00 Active Injection - (All Types) F-18-21S-36E **Actual PSI:** Test Date: Permitted Injection PSI: 6/15/2018 Test Reason: Test Result: 5-year Test Repair Due: 9/18/2018 Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE: Comments on MIT: UIC-MIT-FAILURE, RULE: 19.15.26.11, WOULD NOT LOAD UP **EUNICE MONUMENT SOUTH UNIT No.438** 30-025-04740-00-00 Active Injection - (All Types) B-21-21S-36E **Test Date: Permitted Injection PSI: Actual PSI:** 6/18/2018 Test Reason: 5-year Test Test Result: F Repair Due: 9/21/2018 FAIL TYPE: Other Internal Failure Test Type: Std. Annulus Pres. Test FAIL CAUSE: UIC-MIT - FAILURE, WOULD NOT HOLD PRESSURE, RULE:19.15.26.11 Comments on MIT: **EUNICE MONUMENT SOUTH UNIT No.446** 30-025-04753-00-00 Active Injection - (All Types) F-22-21S-36E Test Date: Permitted Injection PSI: **Actual PSI:** 6/18/2018 Test Reason: Test Result: 5-year Test Repair Due: 9/21/2018 Test Type: FAIL TYPE: Other Internal Failure Std. Annulus Pres. Test FAIL CAUSE: UIC-MIT-FAILURE. RULE: 1915.26.11, WOULD NOT HOLD PRESSURE. Comments on MIT: **EUNICE MONUMENT SOUTH UNIT No.126** 30-025-06288-00-00 M-30-20S-37E Active Injection - (All Types) **Test Date:** 6/12/2018 Permitted Injection PSI: **Actual PSI:** Test Reason: Test Result: 5-year Test Repair Due: 9/15/2018 FAIL TYPE: Other Internal Failure Test Type: Std. Annulus Pres. Test FAIL CAUSE: **Comments on MIT:** UIC-MIT-FAILURE. RULE:19.15.26.11. WOULD NOT HOLD PRESSURE **EUNICE MONUMENT SOUTH UNIT No.144** 30-025-12543-00-00 Active Injection - (All Types) G-36-20S-36E Test Date: Permitted Injection PSI: **Actual PSI:** 6/12/2018 Test Reason: Test Result: 5-year Test Repair Due: 9/15/2018 Test Type: FAIL TYPE: Other Internal Failure Std. Annulus Pres. Test FAIL CAUSE: UIC-MIT-FAILURE. WATER AND PRESSURE ON SURFACE VALVE. RULE:19.15.26.11 **Comments on MIT:** SEVEN RIVERS QUEEN WATERFLOOD, NORTH No.011 30-025-28924-00-00 Active Injection - (All Types) G-4-22S-36E

Test Date: 6/19/2018 Permitted Injection PSI: **Actual PSI:**

Test Reason: Test Result: 5-year Test Repair Due: 9/22/2018

FAIL TYPE: Other Internal Failure Test Type: FAIL CAUSE: Std. Annulus Pres. Test

UIC-MIT-FAILURE. RULE:19.15.26.11. WOULD NOT HOLD PRESSURE Comments on MIT:

EUNICE MONUMENT SOUTH UNIT No.211

30-025-29615-00-00

Active Injection - (All Types)

L-4-21S-36E

9/15/2018

Test Date:

6/12/2018

Permitted Injection PSI:

Actual PSI:

Test Reason:

5-year Test

Test Result:

Repair Due:

Test Type:

Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

Comments on MIT:

FAIL CAUSE:

OPERATOR REPORTED (ALAN MILLER) MIT -FAILURE. 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

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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