

NEW MEXICO ENERGY, MINERALS NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop Cabinet Secretary Mark E. Fesmire, P.E. Director

Oil Conservation Division

Response Required - Deadline Enclosed

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

23-May-08

OXY USA INC PO BOX 4294 HOUSTON TX 77210-

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

EVA E BLINEBRY FEDERAL No.012

30-025-10941-00-00

Active Oil (Producing)

Test Date:

5/19/2008

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

8/22/2008

8/17/2008

Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: BHT FOR WATERFLOW CHECK

30-025-22337-00-00 N-27-23S-37E

J-34-23S-37E

E C HILL B No.002

Active Oil (Producing)

Permitted Injection PSI:

Actual PSI:

Test Date: Test Reason: 5/14/2008 Annual IMIT

Test Result:

Repair Due:

Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT:

CHECK W/TONY SUMMERS; SURFACE WATER FLOW CALLED IN LATER PART OF APRIL

CHECK STATUS OF REPORT

M K STEWART No.004 30-025-22500-00-00

Active Oil (Producing)

I-28-23S-37E

30-025-33445-00-00

30-025-33448-00-00

Test Date: 5/14/2008

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

Test Type:

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Bradenhead Test

SURFACE HAD 290# ON FIRST TEST; 45 MINUTES THE BUILT UP TO 125# DID NOT ATTEMPT Comments on MIT:

TO BLEED DOWN:

C E LAMUNYON No.057

Active Oil (Producing)

E-27-23S-37E

8/17/2008

8/17/2008

Test Date:

5/14/2008

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: E C HILL B No.006 PER OPERATOR IS SHUT IN DUE TO HOLE IN TUBING:

Active Oil (Producing)

K-27-23S-37E

Test Date:

5/14/2008

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

8/17/2008

Test Type:

Bradenhead Test

FAIL TYPE: Other External Failure

FAIL CAUSE:

Comments on MIT: PARTED RODS: BHT FOR WATERFLOW CHECK

E C HILL B FEDERAL No.018

Active Oil (Producing)

30-025-33493-00-00 G-34-23S-37E

Test Date:

5/19/2008

Permitted Injection PSI:

Actual PSI:

Test Reason: Test Type:

Sincerely,

Annual IMIT

Test Result:

Repair Due: **FAIL CAUSE:**

8/22/2008

Bradenhead Test Comments on MIT:

LEAK ON SURFACE VISIBLE CRYSTALS ON SURFACE: VALVE DID NOT HOLD BLEW

FAIL TYPE: Other Internal Failure

METHANOL ON CREW AND MYSELF; CHECKED W/STEVE BISHOP OKAY; BHT FOR

WATERFLOW CHECK

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. Such a hearing may result in imposition of CIVIL PENALTIES for your violation of OCD rules.

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