

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"

09-Oct-08

MAR OIL & GAS CORP. P.O. BOX 5155 SANTA FE, NM 87502

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

MALMAR UNIT No.414

Active Injection - (All Types)

J 30-025-01301-00-00 N-7-17S-33E

12/14/2008

12/14/2008

Test Date:

9/10/2008

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

Test Type:

Std. Annulus Pres. Test

F FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT:

TUBING READS 2450#; SHUT IN IMMEDIATELY; WHILE PRESSURING UP GROUND AROUND

WELLHEAD CRACKED AND ROSE; POSSIBLE CASING LEAK CLOSE TO SURFACE;

MALMAR UNIT No.410

Active Injection - (All Types)

√ 30-025-01311-00-00 J-7-17S-33E

Test Date:

9/10/2008

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

Test Type:

Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT:

WELL IN USE; WOULD NOT HOLD PRESSURE; OPERATOR DISCONNECTED AND SHUT IN

AFTER TEST.

/ 30-025-04435-00-00 **EUMONT HARDY UNIT No.042** Active Injection - (All Types) I-1-21S-36E Permitted Injection PSI: Actual PSI: Test Date: 10/9/2008 Test Result: Repair Due: 1/12/2009 Annual IMIT F Test Reason: Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure **FAIL CAUSE:** Comments on MIT: PER BILLY PRICHARD NO CHANGE OF STATUS; WILL NOT TEST AT THIS TIME, **EUMONT HARDY UNIT No.031** 30-025-04436-00-00 A-1-21S-36E Active Injection - (All Types) Test Date: Permitted Injection PSI: Actual PSI: 9/11/2008 Test Result: Repair Due: 12/15/2008 Test Reason: Annual IMIT FAIL TYPE: Other Internal Failure **FAIL CAUSE:** Test Type: Bradenhead Test Comments on MIT: NEED TO BLEED TO TRUCK **EUMONT HARDY UNIT No.007** ✓ 30-025-06220-00-00 B-36-20S-37E Active Injection - (All Types) Actual PSI: Test Date: Permitted Injection PSI: 9/10/2008 Test Result: Repair Due: 12/14/2008 Test Reason: Annual IMIT FAIL TYPE: Other Internal Failure FAIL CAUSE: Test Type: Std. Annulus Pres. Test Comments on MIT: well not in use at this time; 30-025-06227-00-00 **EUMONT HARDY UNIT No.019** Expired TA Injection - (All Types) L-36-20S-37E Actual PSI: Test Date: 10/9/2008 Permitted Injection PSI: Test Result: Repair Due: 1/12/2009 Test Reason: Annual IMIT FAIL TYPE: Other Internal Failure **FAIL CAUSE:** Test Type: Std. Annulus Pres. Test PER BILLY PRICHARD NO CHANGE IN STATUS; WILL NOT TEST AT THIS TIME: Comments on MIT: **EUMONT HARDY UNIT No.010** 30-025-06229-00-00 Active Injection - (All Types) E-36-20S-37E **Actual PSI:** Permitted Injection PSI: Test Date: 10/9/2008 Test Result: Repair Due: 1/12/2009 Test Reason: Annual IMIT FAIL TYPE: Other Internal Failure Test Type: **FAIL CAUSE:** Std. Annulus Pres. Test Comments on MIT: PER BILLY PRICHARD NO CHANGE OF STATUS WILL NOT TEST AT THIS TIME: **EUMONT HARDY UNIT No.009** 30-025-06230-00-00 Active Injection - (All Types) D-36-20S-37E **Actual PSI:** Permitted Injection PSI: Test Date: 9/10/2008 Test Result: Repair Due: 12/14/2008 Test Reason: Annual IMIT Test Type: FAIL TYPE: Other Internal Failure FAIL CAUSE: Std. Annulus Pres. Test Comments on MIT: PER BILLY PRICHARD (MAR REPRESENTATIVE) WELL WILL NOT TEST AT THIS TIME. **EUMONT HARDY UNIT No.036** 30-025-06407-00-00 Active Injection - (All Types) D-5-21S-37E Actual PSI: Permitted Injection PSI: Test Date: 10/7/2008 Test Result: Repair Due: Test Reason: Annual IMIT 1/10/2009 Test Type: FAIL TYPE: Other Internal Failure **FAIL CAUSE:** Bradenhead Test 1100# ON CASING; OILY MIX ON CASING; 1100 ON TUBING; Comments on MIT: **EUMONT HARDY UNIT No.047** 30-025-06412-00-00 Expired TA Injection - (All Types) K-6-21S-37E Actual PSI: Permitted Injection PSI: Test Date: 10/9/2008 Annual IMIT Test Result: Repair Due: Test Reason: 1/12/2009 FAIL TYPE: Other Internal Failure Test Type: Std. Annulus Pres. Test FAIL CAUSE: Comments on MIT: PER BILLY PRICHARD NO STATUS CHANGE; WILL NOT TEST

EUMONT HARDY UNIT No.038

Expired TA Injection - (All Types)

√30-025-06414-00-00 I-6-21S-37E

1/10/2009

Actual PSI:

10/7/2008 Permitted Injection PSI: Test Date:

Annual IMIT Test Reason:

Test Result:

Repair Due:

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

Comments on MIT:

WILL NOT TEST; FAILURE

√ 30-025-06422-00-00

Active Injection - (All Types)

G-6-21S-37E

Test Date: 10/7/2008

Annual IMIT Test Reason:

EUMONT HARDY UNIT No.035

Permitted Injection PSI:

Actual PSI:

Repair Due: 1/10/2009

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

FAIL CAUSE:

Comments on MIT:

LOADED WITH 26 BBLS OF FLUID; NO PRESSURE TEST; FAILURE

30-025-25241-00-00

FAIL TYPE: Other Internal Failure

Active Salt Water Disposal Well

D-35-10S-36E

Test Date: 10/9/2008 Permitted Injection PSI:

Actual PSI:

Test Reason:

SANTA FE No.002

Annual IMIT

Test Result:

Repair Due: **FAIL CAUSE:**

1/12/2009

Test Type: Std. Annulus Pres. Test

Comments on MIT: well will not hold pressure;

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.

ncerely.

Hobbs OCD District Office COMPLIANCE OFFICER

lote: 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

FIRST CLASS



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MAR OIL & GAS CORP. P.O. BOX 5155 SANTA FE, NM 87502