



# NEW MEXICO ENERGY, MINERALS and 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  
ATTN: BILLY PRICHARD  
P.O. BOX 444  
SEMINOLE, TX 79360

**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***

|                                                                                                                                                               |                                   |                             |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|-----------------------------|
| <b>MALMAR UNIT No.414</b>                                                                                                                                     |                                   | <b>J 30-025-01301-00-00</b> |
| Active Injection - (All Types)                                                                                                                                |                                   | N-7-17S-33E                 |
| Test Date: 9/10/2008                                                                                                                                          | Permitted Injection PSI:          | Actual PSI:                 |
| Test Reason: Annual IMIT                                                                                                                                      | Test Result: F                    | Repair Due: 12/14/2008      |
| Test Type: Std. Annulus Pres. Test                                                                                                                            | 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; |                                   |                             |
| <b>MALMAR UNIT No.410</b>                                                                                                                                     |                                   | <b>J 30-025-01311-00-00</b> |
| Active Injection - (All Types)                                                                                                                                |                                   | J-7-17S-33E                 |
| Test Date: 9/10/2008                                                                                                                                          | Permitted Injection PSI:          | Actual PSI:                 |
| Test Reason: Annual IMIT                                                                                                                                      | Test Result: F                    | Repair Due: 12/14/2008      |
| 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.                                                          |                                   |                             |

**EUMONT HARDY UNIT No.042**✓ 30-025-04435-00-00  
I-1-21S-36E

## Active Injection - (All Types)

Test Date: 10/9/2008 Permitted Injection PSI: Actual PSI:  
Test Reason: Annual IMIT Test Result: F Repair Due: 1/12/2009  
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: 9/11/2008 Permitted Injection PSI: Actual PSI:  
Test Reason: Annual IMIT Test Result: F Repair Due: 12/15/2008  
Test Type: Bradenhead Test FAIL TYPE: Other Internal Failure FAIL CAUSE:  
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)

Test Date: 9/10/2008 Permitted Injection PSI: Actual PSI:  
Test Reason: Annual IMIT Test Result: F Repair Due: 12/14/2008  
Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE:  
Comments on MIT: well not in use at this time;

**EUMONT HARDY UNIT No.019**✓ 30-025-06227-00-00  
L-36-20S-37E

## Expired TA Injection - (All Types)

Test Date: 10/9/2008 Permitted Injection PSI: Actual PSI:  
Test Reason: Annual IMIT Test Result: F Repair Due: 1/12/2009  
Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE:  
Comments on MIT: PER BILLY PRICHARD NO CHANGE IN STATUS; WILL NOT TEST AT THIS TIME;

**EUMONT HARDY UNIT No.010**✓ 30-025-06229-00-00  
E-36-20S-37E

## Active Injection - (All Types)

Test Date: 10/9/2008 Permitted Injection PSI: Actual PSI:  
Test Reason: Annual IMIT Test Result: F Repair Due: 1/12/2009  
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.009**✓ 30-025-06230-00-00  
D-36-20S-37E

## Active Injection - (All Types)

Test Date: 9/10/2008 Permitted Injection PSI: Actual PSI:  
Test Reason: Annual IMIT Test Result: F Repair Due: 12/14/2008  
Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE:  
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  
D-5-21S-37E

## Active Injection - (All Types)

Test Date: 10/7/2008 Permitted Injection PSI: Actual PSI:  
Test Reason: Annual IMIT Test Result: F Repair Due: 1/10/2009  
Test Type: Bradenhead Test FAIL TYPE: Other Internal Failure FAIL CAUSE:  
Comments on MIT: 1100# ON CASING; OILY MIX ON CASING; 1100 ON TUBING;

**EUMONT HARDY UNIT No.047**✓ 30-025-06412-00-00  
K-6-21S-37E

## Expired TA Injection - (All Types)

Test Date: 10/9/2008 Permitted Injection PSI: Actual PSI:  
Test Reason: Annual IMIT Test Result: F Repair Due: 1/12/2009  
Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE:  
Comments on MIT: PER BILLY PRICHARD NO STATUS CHANGE, WILL NOT TEST

**EUMONT HARDY UNIT No.038**J 30-025-06414-00-00  
I-6-21S-37E

Expired TA Injection - (All Types)

Test Date: 10/7/2008  
Test Reason: Annual IMIT  
Test Type: Std. Annulus Pres. Test  
Comments on MIT: WILL NOT TEST; FAILURE

Permitted Injection PSI:

Test Result: F

FAIL TYPE: Other Internal Failure

Actual PSI:

Repair Due: 1/10/2009

FAIL CAUSE:

**EUMONT HARDY UNIT No.035**J 30-025-06422-00-00  
G-6-21S-37E

Active Injection - (All Types)

Test Date: 10/7/2008  
Test Reason: Annual IMIT  
Test Type: Std. Annulus Pres. Test  
Comments on MIT: LOADED WITH 26 BBLS OF FLUID; NO PRESSURE TEST; FAILURE

Permitted Injection PSI:

Test Result: F

FAIL TYPE: Other Internal Failure

Actual PSI:

Repair Due: 1/10/2009

FAIL CAUSE:

**SANTA FE No.002**J 30-025-25241-00-00  
D-35-10S-36E

Active Salt Water Disposal Well

Test Date: 10/9/2008  
Test Reason: Annual IMIT  
Test Type: Std. Annulus Pres. Test  
Comments on MIT: well will not hold pressure;

Permitted Injection PSI:

Test Result: F

FAIL TYPE: Other Internal Failure

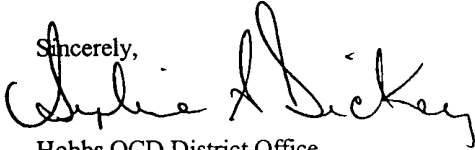
Actual PSI:

Repair Due: 1/12/2009

FAIL CAUSE:

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.

Sincerely,



Hobbs OCD District Office

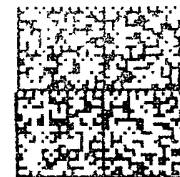
**COMPLIANCE OFFICER**

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.

✓  
mld

EMNRD  
OIL CONSERVATION DIVISION  
1625 N FRENCH DRIVE  
HOBBS NM 88240

FIRST  
CLASS

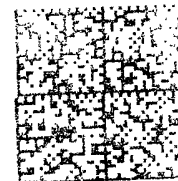


|        |                   |            |
|--------|-------------------|------------|
| HASLER | 7-115554612       | US POSTAGE |
|        | \$0.830           |            |
|        | 10/09/2008        |            |
|        | Mailed From 88240 |            |

MAR OIL & GAS  
ATTN: BILLY PRICHARD  
P.O. BOX 444  
SEMINOLE, TX 79360

EMNRD  
OIL CONSERVATION DIVISION  
1625 N FRENCH DRIVE  
HOBBS NM 88240

FIRST  
CLASS



4451 PM

50.830

From 12C40

US POSTAGE

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

✓ Pld