

## NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor Joanna Prukop Cabinet Secretary

Mark E. Fesmire, P.E. Director Oil Conservation Division

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

29-Oct-08

APACHE CORP 6120 S YALE SUITE 1500 TULSA OK 74136-4224

### 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

NORTH MON	IUMENT G/SA UNIT No.00	3	√ 30-025-05641-00-00
		Active Injection - (All Typ	es) C-19-19S-37E
Test Date:	10/16/2008	Permitted Injection PSI:	Actual PSI:
Test Reason:	Annual IMIT	Test Result: F	Repair Due: 1/19/2009
Test Type:	Bradenhead Test	FAIL TYPE: Casing	FAIL CAUSE:
Comments on	MIT: CASING PRESSURE C RUN TO VERIFY CAS	•	OCD REQUEST A PRESSURE TEST BE
NORTH MON	UMENT G/SA UNIT No.00	6	J 30-025-05721-00-00
		Active Injection - (All Typ	es) F-29-19S-37E
Test Date:	10/16/2008	Permitted Injection PSI:	Actual PSI:
Test Reason:	Annual IMIT	Test Result: F	Repair Due: 1/19/2009
Test Type:	Bradenhead Test	FAIL TYPE: Tubing	FAIL CAUSE:
Comments on	MIT: PER OPERATOR HOL	E IN TUBING WILL NOT TEST;	
NORTH MON	UMENT G/SA UNIT No.00	J 30-025-05761-00-00	

Active Injection - (All Types)

G-31-19S-37E

Test Date: 10/17/2008

Permitted Injection PSI:

Actual PSI:

Repair Due: 1/19/2009

Annual IMIT Test Type: Bradenhead Test

Test Reason:

FAIL TYPE: Tubing

Test Result:

FAIL CAUSE:

Comments on MIT: PER OPERATOR CASING WILL NOT BLEED DOWN;

#### NORTH MONUMENT G/SA UNIT No.011

J 30-025-05770-00-00

Active Injection - (All Types)

Test Date:

10/17/2008

Permitted Injection PSI:

Actual PSI:

K-31-19S-37E

Test Reason:

Annual IMIT

Test Result: F Repair Due:

1/20/2009

1/19/2009

Test Type:

Bradenhead Test

FAIL TYPE: Casing

**FAIL CAUSE:** 

Comments on MIT: OIL ON CASING DID NOT BLEED DOWN;

<sup>1</sup> 30-025-05795-00-00

Active Injection - (All Types)

A-32-19S-37E

Test Date:

10/16/2008

NORTH MONUMENT G/SA UNIT No.001

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:

FAILED DUE TO OIL ON SURFACE BRADENHEAD;

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 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.

EMNRD
OIL CONSERVATION DIVISION
1625 N FRENCH DRIVE
HOBBS NM 88240

FIRST CLASS



017H15554612 \$0.830

10/29/2008

Mailed From 88240

APACHE CORP. 6120 S. YALE STE. 1500 TULSA, OK 74136-4224 EMNRD
OIL CONSERVATION DIVISION
1625 N FRENCH DRIVE
HOBBS NM 88240

FIRST CLASS



017H1585367.7 US \$0.830 August 10/29/2005 US Mailed From 88240 US

APACHE CORPORATION ATTN: MIKE WARREN/JIM ELLISON DRAWER D MONUMENT, NM 88265