

# NEW MEXICO ENERGY, MINERALS 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"

10-Dec-08

CRAZY HORSE, LLC 3540 S POPLAR ST, SUITE 100 DENVER CO 80237-

### 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

#### **HOBBS SWD No.016**

30-025-07701-00-00

Active Salt Water Disposal Well

P-16-19S-38E

3/15/2009

Test Date:

12/10/2008

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:

0 PRESS. ON SURF., 0 PRESS. ON PROD. CSG., TBG ON 18" VAC. FLOWLINE CLOSED OFF; COMMENCED TO LOAD WELL; LOADED WITH 30 BBLS. NEVER WOULD LOAD COMPLETELY TO PERFORM PRESSURE TEST; WORKED WELL-OPENED UP FLOWLINE AND TUBING WHILE TRUCK LOADED, TUBING GAGE COMMENCED TO RISE AS PUMP TRUCK STARTED TO LOAD ON CASING; TEST RESULT BY STATE- POSSIBLE COMMUNICATION WITHIN TUBING AND PRODUCTION CASING AND/OR PACKER PROBLEM. \*\*PRIOR VIOLATION ON WELL SIGN -OPERATOR HAS ORDERED SIGN OUT OF LUBBOCK, TX.\*\* VIOLATION NMOCD RULE 103,

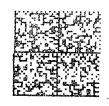
**RULE 107.** 

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

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



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