

# 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 Demking Water"

21-Jan-09

#### FOREST OIL CORPORATION

3504 W. County Rd. Hobbs NM 88240-0000

## LETTER OF VIOLATION and SHUT-IN DIRECTIVE **Failed Mechanical Integrity Test**

Repair Due:

FAIL CAUSE:

4/26/2009

#### Dear Operator:

Test Reason:

Test Type:

Annual IMIT

Comments on MIT: BHT FAIL.

Bradenhead Test

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** 

MALJAMAR	<b>GRAYBURG UNIT No.012</b>		minimum or on	30-025-00445-00-00
		Active Injection - (All Types)		O-3-17S-32E
Test Date:	1/21/2009	Permitted Injection PSI:	Actual PSI:	
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	4/26/2009
Test Type:	Bradenhead Test	FAIL TYPE: Communication Between	FAIL CAUSE:	
Comments on	MIT: OPERATOR CONCEE	OS, BHT FAILURE.		
CAPROCK MALJAMAR UNIT No.013				30-025-00528-00-00
		Active Injection - (All Types)		J-13-17S-32E
Test Date:	1/21/2009	Permitted Injection PSI:	Actual PSI:	
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	4/26/2009
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:	
Comments on	MIT: Well will not hold pressu	ure ·		
CAPROCK M	ALJAMAR UNIT No.049	3		30-025-00662-00-00
		Active Injection - (All Types)		H-24-17S-32E
Test Date:	1/21/2009	Permitted Injection PSI:	Actual PSI:	.,

F

FAIL TYPE: Other Internal Failure

Test Result:

CAPROCK MALJAMAR UNIT No.052 30-025-01480-00-00 G-19-17S-33E Active Injection - (All Types) Actual PSI: Test Date: Permitted Injection PSI: 1/21/2009 Test Reason: Test Result: Repair Due: 4/26/2009 5-year Test Test Type: FAIL TYPE: Other Internal Failure **FAIL CAUSE:** Std. Annulus Pres. Test Comments on MIT: Well would not pressure-up. 30-025-01490-00-00 CAPROCK MALJAMAR UNIT No.070 Active Injection - (All Types) J-20-17S-33E Actual PSI: Permitted Injection PSI: Test Date: 1/21/2009 Test Reason: Test Result: Repair Due: 4/26/2009 Annual IMIT Test Type: FAIL TYPE: Tubing FAIL CAUSE: Bradenhead Test Comments on MIT: OPERATOR CONCESSION WELL WOULD NOT TEST AND HAS BEEN SI CAPROCK MALJAMAR UNIT No.084 30-025-01494-00-00 P-20-17S-33E Active Injection - (All Types) Actual PSI: Test Date: 1/21/2009 Permitted Injection PSI: Test Reason: Test Result: Repair Due: 4/26/2009 5-year Test F

**CAPROCK MALJAMAR UNIT No.069** 

30-025-01496-00-00

Active Injection - (All Types)

K-20-17S-33E

Permitted Injection PSI: 1/21/2009

4/26/2009

Test Date: Test Reason: Annual IMIT Test Result:

Std. Annulus Pres. Test

Actual PSI: Repair Due:

**FAIL CAUSE:** 

Test Type: Bradenhead Test

F FAIL TYPE: Other Internal Failure

FAIL TYPE: Other Internal Failure

Comments on MIT: OPERATOR CONCEEDS WELL WILL NOT TEST. IDLE WELL W/ PROD 73 MOS. OUT.

**FAIL CAUSE:** 

Comments on MIT: BHT FAILURE, HIGH PRESSURE CB W/ SHOW OF OIL ON PROD

CAPROCK MALJAMAR UNIT No.094

30-025-01531-00-00

Active Injection - (All Types)

K-28-17S-33E

Test Date:

1/21/2009

Permitted Injection PSI:

Actual PSI:

Test Reason: Annual IMIT Test Result: Repair Due:

4/26/2009

Test Type:

Test Type:

Bradenhead Test

FAIL TYPE: Communication Between

FAIL CAUSE:

Comments on MIT: BHT FAIL. OPERATOR CONCEEDS TEST FAILURE.

30-025-20318-00-00

MALJAMAR GRAYBURG UNIT No.008

Active Injection - (All Types)

K-3-17S-32E

Test Date: Test Reason: 1/21/2009

Permitted Injection PSI:

F

Actual PSI:

4/26/2009

Annual IMIT

Test Result:

Repair Due:

Test Type:

Bradenhead Test

**FAIL TYPE:** 

FAIL CAUSE:

Comments on MIT: BHT OK, OVER INJ. 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.

Hobbs OCD District Office

Sincerely

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



FOREST OIL CORPORATION 3504 W. COUNTY RD. HOBBS NM 88240