

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop Cabinet Secretary AKIMENI

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

Response Required - Deadline Enclosed

Underground Sajection Control Program
"Protecting Our Underground Society of Wrintee" Water"

18-Feb-09

CONOCOPHILLIPS COMPANY

3300 N A STREET BLDG 6 #247 MIDLAND TX 79710-0000

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

VACUUM ABO UNIT No.061

30-025-03003-00-00 G-34-17S-35E

30-025-03004-00-00

J-34-17S-35E

Expired TA Oil (Producing)

Test Date: 2/18/2009 Permitted Injection PSI: Actual PSI:

Test Reason: 5-year Test Test Result: F Repair Due: 5/24/2009

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

Comments on MIT: MIT FAILURE. SIGNIFICNT PRESSURE DROP MORE THAN 10% DURING TEST.

VACUUM ABO UNIT No.064

Expired TA Oil (Producing) A-34-17S-35E

Test Date: 2/18/2009 Permitted Injection PSI: Actual PSI:

Test Reason: TA Status Test Test Result: F Repair Due: 5/24/2009

Test Type: Std. Annulus Pres. Test FAIL TYPE: Communication Between FAIL CAUSE:

Comments on MIT: PRESSURE UP TO 380, SHOW OF OIL ON SURFACE CSG, TEST WAS TERMINATED.

VACUUM ABO UNIT No.009 30-025-03015-00-00

Active Injection - (All Types)

Test Date: 2/18/2009 Permitted Injection PSI: Actual PSI:

Test Reason: 5-year Test Test Result: F Repair Due: 5/24/2009

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

Comments on MIT: MIT FAIL. WELL HAD MORE THAN 10% INCREASE IN PRESSURE DURING TEST.

EAST VACUUM (GSA) UNIT No.005

30-025-26862-00-00

Active Injection - (All Types)

P-31-17S-35E

Test Date:

2/18/2009

Permitted Injection PSI:

Actual PSI:

Test Reason:

5-year Test

Test Result:

Repair Due: 5/24/2009

Test Type:

Std. Annulus Pres. Test

FAIL TYPE: Communication Between

FAIL CAUSE:

Comments on MIT: MIT FAILURE. PRESSURE UP TO 200 PSI, SHOW OF OIL FROM BELOW GROUND SURFACE.

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,

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



02/19/2009

Mailed From 88240

CONOCOPHILLIPS COMPANY 3300 N A STREET BLDG 6 #247 MIDLAND, TX 79710