

NEW MEXICO ENERGY, MINERALS NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop Cabinet Secretary

Director Oil Conservation Division

Response Required - Deadline Enclosed

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

11-Jan-10

APACHE CORP

6120 S YALE SUITE 1500 TULSA OK 74136-4224

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

Mark E. Fesmire, P.E.

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

EAST BLINEBRY DRINKARD UNIT No.003

30-025-06325-00-00

Active Injection - (All Types)

M-1-21S-37E

Test Date:

1/6/2010

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

4/11/2010 Repair Due:

Test Type: Comments on MIT: BHT FAILURE. CONTINUOUS BLOW OF OIL FROM SURFACE CSG. WELL IS SHUT IN.

Bradenhead Test

FAIL TYPE: Communication Between

FAIL CAUSE:

EAST BLINEBRY DRINKARD UNIT No.056

Plugged (SITE RELEASED) Injection - (All Types)

30-025-06334-00-00 M-1-21S-37E

Test Date:

1/7/2010

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

4/12/2010

Test Type:

Bradenhead Test

FAIL TYPE: Communication Between

FAIL CAUSE:

Comments on MIT:

BHT FAILURE. WATER ON SURFACE CSG.

30-025-06465-00-00

NORTHEAST DRINKARD UNIT No.506

Active Injection - (All Types)

O-10-21S-37E

Test Date:

1/8/2010

Permitted Injection PSI:

Actual PSI:

4/13/2010

Test Reason: Test Type:

5-year Test

Test Result:

Repair Due:

FAIL CAUSE:

Std. Annulus Pres. Test

FAIL TYPE: Communication Between

MIT FAILURE. FLUID FLOW FROM SURFACE CSG. Comments on MIT:

EAST BLINEBRY DRINKARD UNIT No.018 30-025-06479-00-00 Active Injection - (All Types) A-11-21S-37E Test Date: 1/7/2010 Permitted Injection PSI: Actual PSI: Test Reason: Annual IMIT Test Result: F Repair Due: 4/12/2010 Test Type: Bradenhead Test FAIL TYPE: Casing **FAIL CAUSE:** Comments on MIT: BHT FAILURE. 2ND NOTICE, OF NON-COMPLIANCE. CONTINUOUS BLOW OF OIL ON PRODUCTION. NORTHEAST DRINKARD UNIT No.216 30-025-06483-00-00 Active Injection - (All Types) K-2-21S-37E Test Date: 1/7/2010 Permitted Injection PSI: Actual PSI: Test Reason: Annual IMIT Test Result: Repair Due: 4/12/2010 Test Type: FAIL TYPE: Tubing Bradenhead Test **FAIL CAUSE:** BHT FAILURE. PRODUCTION CSG EQUALIZED TBG PRESSURE (295PSI) WITH CONTINUOUS Comments on MIT: BLOW OF WATER. NORTHEAST DRINKARD UNIT No.308 30-025-06494-00-00 Active Injection - (All Types) I-3-21S-37E Test Date: 1/7/2010 Permitted Injection PSI: Actual PSI: Test Reason: Annual IMIT Test Result: Repair Due: 4/12/2010 Test Type: FAIL TYPE: Casing Bradenhead Test **FAIL CAUSE:** Comments on MIT: BHT FAILURE. CONTINUOUS BLOW OIL ON INTERMEDIATE CSG. NORTHEAST DRINKARD UNIT No.309 30-025-06499-00-00 Active Injection - (All Types) I-3-21S-37E Test Date: 1/8/2010 Permitted Injection PSI: Actual PSI: Test Reason: 5-year Test Test Result: Repair Due: 4/13/2010 Test Type: Std. Annulus Pres. Test FAIL TYPE: Tubing **FAIL CAUSE:** Comments on MIT: Well will not hold adequate pressure NORTHEAST DRINKARD UNIT No.207 30-025-06519-00-00 Active Injection - (All Types) 14-3-21S-37E Test Date: Permitted Injection PSI: 1/11/2010 Actual PSI: Test Reason: 5-year Test Test Result: F Repair Due: 4/16/2010 Test Type: Std. Annulus Pres. Test FAIL TYPE: Communication Between **FAIL CAUSE:** Comments on MIT: MIT FAILURE. FLUID FLOW FROM SURFACE CSG. NORTHEAST DRINKARD UNIT No.511 30-025-06532-00-00 Active Injection - (All Types) M-11-21S-37E Test Date: 1/8/2010 Permitted Injection PSI: Actual PSI: Test Reason: 5-year Test Test Result: Repair Due: 4/13/2010 Test Type: Std. Annulus Pres. Test FAIL TYPE: Wellhead Assembly **FAIL CAUSE:** MIT FAILURE. UNABLE TO TEST WELL, FAULTY WELLHEAD ASSEMBLY, WELL WOULD NOT Comments on MIT: HOLD ADEQUATE PRESSURE. EAST BLINEBRY DRINKARD UNIT No.027 30-025-06535-00-00 Active Injection - (All Types) E-11-21S-37E Test Date: 1/7/2010 Permitted Injection PSI: Actual PSI: Test Reason: Annual IMIT Test Result: Repair Due: 4/12/2010 Test Type: Bradenhead Test FAIL TYPE: Casing **FAIL CAUSE:** Comments on MIT: BHT FAILURE. FLUID ON SURFACE CSG. NORTHEAST DRINKARD UNIT No.806 30-025-06727-00-00

Active Injection - (All Types)

Actual PSI:

B-22-21S-37E

Permitted Injection PSI:

Test Reason: 5-year Test Test Result: F Repair Due: 4/16/2010

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

Test Date:

1/11/2010

Comments on MIT: COMMUNICATION BETWEEN CSG STRINGS. TBG AND CSG HAVE EQUAL PRESSURE 400PSI

NORTHEAST DRINKARD UNIT No.907

30-025-06745-00-00

Active Injection - (All Types)

J-22-21S-37E

Test Date:

1/7/2010

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

F

Repair Due:

Test Type: Bradenhead Test FAIL TYPE: Communication Between FAIL CAUSE:

Comments on MIT: BHT FAILURE. COMMUNICATION BETWEEN CSG STRINGS, BLOW OF FLUID ON BOTH

SURFACE CSG & PRODUCTION CSG(300PSI)

NORTHEAST DRINKARD UNIT No.915

30-025-06766-00-00

4/12/2010

4/12/2010

Active Injection - (All Types)

Actual PSI:

Test Date:

1/7/2010

Permitted Injection PSI: Test Result:

Test Reason: Annual IMIT Test Type:

Bradenhead Test

FAIL TYPE: Casing

Repair Due: FAIL CAUSE:

BHT FAILURE - FLUID ON SURFACE CSG. Comments on MIT:

NORTHEAST DRINKARD UNIT No.811

30-025-06771-00-00

Active Injection - (All Types)

E-23-21S-37E

J-23-21S-37E

Test Date: Test Reason:

Test Date:

1/11/2010 5-year Test Permitted Injection PSI:

Actual PSI:

Test Result: Repair Due:

4/16/2010

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

Active Injection - (All Types)

Active Injection - (All Types)

FAIL CAUSE:

Comments on MIT: FLUID FLOW FROM SURFACE - (FUEL - GASOLINE) SMELL TO IT.

NORTHEAST DRINKARD UNIT No.813

30-025-06772-00-00 F-23-21S-37E

Active Injection - (All Types)

1/11/2010 Test Reason: 5-year Test Permitted Injection PSI: Test Result:

Actual PSI:

Repair Due: 4/16/2010

Test Type: Std. Annulus Pres. Test FAIL TYPE: Tubing

FAIL CAUSE:

COMMUNICATION BETWEEN TBG AND CSG STRINGS. TBG AND CSG HAVE EQUAL Comments on MIT:

PRESSURE, 400PSI.

SOUTH EUNICE SEVEN RIVERS QUEEN UNIT No.502

30-025-09033-00-00

M-26-22S-36E

Test Date:

1/7/2010

Permitted Injection PSI:

FAIL TYPE: Tubing

Actual PSI:

4/12/2010

Test Reason: Test Type:

5-year Test

Test Result:

Repair Due:

FAIL CAUSE:

Comments on MIT: Well will not hold pressure

Std. Annulus Pres. Test

SOUTH EUNICE SEVEN RIVERS QUEEN UNIT No.401

30-025-09036-00-00 O-26-22S-36E

Test Date:

1/7/2010

Permitted Injection PSI:

Test Reason:

Actual PSI:

Test Type:

5-year Test

Test Result:

Repair Due:

Std. Annulus Pres. Test

FAIL TYPE: Tubing

FAIL CAUSE:

Comments on MIT: Well will not hold adequate pressure

NORTHEAST DRINKARD UNIT No.803

30-025-09929-00-00

Active Injection - (All Types)

Permitted Injection PSI:

C-22-21S-37E

4/16/2010

4/16/2010

4/12/2010

Test Reason:

Test Date:

1/11/2010 5-year Test

Test Result:

Actual PSI: Repair Due:

Test Type:

Std. Annulus Pres. Test

FAIL TYPE: Tubing

FAIL CAUSE:

Comments on MIT: Well will not hold adequate pressure

Active Injection - (All Types)

30-025-09932-00-00 K-23-21S-37E

Test Date:

1/11/2010

NORTHEAST DRINKARD UNIT No.913

Permitted Injection PSI:

Actual PSI:

Test Reason:

5-year Test

Test Result:

Repair Due:

Test Type:

Std. Annulus Pres. Test

FAIL TYPE: Casing

Comments on MIT: MIT FAILURE, OIL FLOW FROM SURFACE.

FAIL CAUSE:

NORTHEAST DRINKARD UNIT No.202

30-025-26990-00-00 9-4-21S-37E

4/13/2010

Active Injection - (All Types)

Test Date: 1/8/2010 Pe

Permitted Injection PSI:

Actual PSI:

Test Reason: 5-year Test Test Result: F

Test Type: Std

Std. Annulus Pres. Test

FAIL TYPE: Tubing

Repair Due:

FAIL CAUSE:

Comments on MIT: Well will not hold adequate 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.

Chal S

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



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