

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 Drinking Water"

12-Apr-10

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

EAST VACUUM (GSA) UNIT No.003

30-025-02897-00-00 - J-27-17S-35E

Active Injection - (All Types)

Test Date: 2/8/2010 Permitted Injection PSI:

Actual PSI:

Test Reason:

Test Result:

Repair Due: 5/14/2010

Test Type:

Annual IMIT

Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

NO CHART, OPERTOR STATED WILL NOT PASS MECHANICAL INTEGRITY; ***** OPERATOR

IN VIOLATION OF NMOCD RULES ***19.15.26.11****

EAST VACUUM (GSA) UNIT No.036

2/1/2010

30-025-03058-00-00

Active Oil (Producing)

Permitted Injection PSI: Actual PSI: C-5-18S-35E

Test Date: Test Reason:

Annual IMIT

Test Result:

Repair Due:

Test Type:

Bradenhead Test

FAIL TYPE: Communication Between FAIL CAUSE:

BHT FAILURE ****OPERATOR IN VIOLATION OF NMOCD RULE 19..526.11*******

30-025-03110-00-00 **VACUUM ABO UNIT No.003** B-8-18S-35E Active Injection - (All Types) Actual PSI: Permitted Injection PSI: **Test Date:** 2/10/2010 Repair Due: 5/16/2010 Test Result: Test Reason: Annual IMIT FAIL TYPE: Other Internal Failure **FAIL CAUSE: Test Type:** Std. Annulus Pres. Test STOPPED TEST 5 MINS INTO THE PRESSURE TEST; OIL COMMENCED FROM INTERMEDIATE Comments on MIT: DID NOT STOP FLOWING; ****OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11***** 30-025-07864-00-00 **SEMU PERMIAN No.026** E-30-20S-38E Active Injection - (All Types) **Actual PSI: Permitted Injection PSI: Test Date:** 4/6/2010 -Repair Due: 7/10/2010 Test Result: **Test Reason:** Annual IMIT FAIL TYPE: Other Internal Failure **FAIL CAUSE:** Test Type: Std. Annulus Pres. Test NO TEST OPERATOR CONCEDED COMMUNICATION (BACKSIDE). ***OPERATOR IN Comments on MIT: .VIOLATION OF NMOCD RULE 19.15.26.11**** 30-025-20516-00-00 PHILMEX No.009 B-26-17S-33E Active Injection - (All Types) Permitted Injection PSI: Actual PSI: **Test Date:** 2/16/2010 Repair Due: 5/22/2010 Test Result: F Test Reason: Annual IMIT FAIL TYPE: Other Internal Failure **FAIL CAUSE:** Test Type: Std. Annulus Pres. Test 3 PRE TESTS WELL FAILED ALL THREE WITHIN 10 MINUTES; ***OPERATOR IN VIOLATION Comments on MIT: OF NMOCD RULE 19.15.26.11**** 30-025-25203-00-00 WARREN UNIT BLINEBRY TUBB WF No.039 B-34-20S-38E Active Injection - (All Types) **Actual PSI: Permitted Injection PSI:** Test Date: 4/6/2010 Repair Due: 7/10/2010 **Test Result: Test Reason:** Annual IMIT **FAIL CAUSE:** FAIL TYPE: Other Internal Failure Test Type: Std. Annulus Pres. Test WOULD NOT LOAD TO PRESSURE TEST; ****OPERATOR IN VIOLATION OF NMOCD RULE Comments on MIT: 19.15.26.11 ****** 30-025-26520-00-00 EAST VACUUM (GSA) UNIT No.003 Active Injection - (All Types) .M-33-17S-35E **Actual PSI: Permitted Injection PSI: Test Date:** 2/10/2010 Repair Due: 5/16/2010 **Test Result:** Test Reason: Annual IMIT FAIL TYPE: Other Internal Failure **FAIL CAUSE:** Test Type: Std. Annulus Pres. Test WHILE PRESSURING UP CASING WATER COMMENCED TO EMERGE FROM SURFACE CASING: Comments on MIT: FAILED PT; *****OPERATOR IN VIOLATION OF NMOCD RULE****19.15.26.11 30-025-26780-00-00 EAST VACUUM (GSA) UNIT No.012 M-28-17S-35E

Active Injection - (All Types)

Actual PSI:

5/14/2010

2/9/2010 Annual IMIT Test Reason:

Permitted Injection PSI:

Test Result:

Repair Due: 5/15/2010

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

Test Date:

FAIL CAUSE:

SURFACE CASING STARTED TO LEAK; FAILED MECHANICAL INTEGRITY **** OPERATOR IN Comments on MIT: VIOLATION OF NMOCD RULE 19.15.26.11 ****

EAST VACUUM (GSA) UNIT No.001

Active Injection - (All Types)

30-025-27315-00-00 O-21-17S-35E

Test Date: 2/8/2010

Permitted Injection PSI:

Actual PSI:

Test Reason: **Annual IMIT** **Test Result:**

Repair Due:

Test Type: **Bradenhead Test** FAIL TYPE: Packer

FAIL CAUSE:

MIT FAILURE 900# ON CSG. PACKER PROBLEM. WELL WAS SHUT IN. *****OPERATOR IN Comments on MIT:

VIOLATION OF NMOCD RULE 19.15.26.11******

EAST VACUUM (GSA) UNIT No.387

Active Injection - (All Types)

30-025-32665-00-00 L-33-17S-35E

Test Date:

2/10/2010

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due: 5/16/2010

Test Type:

Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

DID NOT HOLD PRESSURE; ****OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11*****

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**



04/12/2010 Malled From 88240

CONOCO PHILLIPS CO. ATTN: REG.DEPT. 3300 N. 'A' STR., BLDG 6 #247 MIDLAND, TX 79705

EMNRD
OIL CONSERVATION DIVISION
1625 N FRENCH DRIVE
HOBBS NM 88240



CONOCO PHILLIPS ATTN:KENNY KIDD/ RUDY QUIROZ HC 60 BOX 66 LOVINGTON, NM 88260 EMNRD
OIL CONSERVATION DIVISION
1625 N FRENCH DRIVE
HOBBS NM 88240



017H15554612 C W \$0.440 C SV 04/12/2010 G Melled From88240 G

CONOCO PHILLIPS ATTN: VERNON MACKEY 1410 N. WEST COUNTY ROAD HOBBS, NM 88240