



# NEW MEXICO ENERGY, MINERALS and 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"***

30-Apr-10

OCCIDENTAL PERMIAN LTD.  
ATTN: GLEN HUBBARD  
1017 W. STANOLIND RD.  
HOBBS, NM 88240

## **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***

#### **NORTH HOBBS G/SA UNIT No.241**

**30-025-07508-00-00**

N-31-18S-38E

Test Date:	4/29/2010	Approved TA Oil (Producing)	Permitted Injection PSI:	Actual PSI:
Test Reason:	Annual IMIT	Test Result:	F	Repair Due:
Test Type:	Std. Annulus Pres. Test	FAIL TYPE:	Other Internal Failure	FAIL CAUSE:
Comments on MIT:	WOULD NOT HOLD PRESSURE DURING PRESURE TEST; ATTEMPTED TWO PRESSURE TESTS; FAILED BOTH; *****OPERATOR IN VIOLATION OF NMOC D RULE 19.15.26.11*****			

#### **NORTH HOBBS G/SA UNIT No.221**

**30-025-07520-00-00**

F-32-18S-38E

Test Date:	4/22/2010	Active Oil (Producing)	Permitted Injection PSI:	Actual PSI:
Test Reason:	Annual IMIT	Test Result:	F	Repair Due:
Test Type:	Bradenhead Test	FAIL TYPE:	Other Internal Failure	FAIL CAUSE:
Comments on MIT:	PKR IN HOLE CASING WOULD NOT BLEED DOWN FLOWING GAS WELL; *****OPERATOR IN VIOLATION OF NMOC D RULE 19.15.26.11*****			

**SOUTH HOBBS G/SA UNIT No.053****30-025-07612-00-00**

Active Injection - (All Types)

M-4-19S-38E

Test Date: 4/28/2010 Permitted Injection PSI: Actual PSI:  
Test Reason: Annual IMIT Test Result: F Repair Due: 8/1/2010  
Test Type: Bradenhead Test FAIL TYPE: Other Internal Failure FAIL CAUSE:  
Comments on MIT: CASING WOULD NOT BLEED DOWN; COMMUNICATION BETWEEN CASING AND TUBING;  
\*\*\*OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11\*\*\*\*

**SOUTH HOBBS G/SA UNIT No.011****30-025-07635-00-00**

Active Injection - (All Types)

A-6-19S-38E

Test Date: 4/28/2010 Permitted Injection PSI: Actual PSI:  
Test Reason: Annual IMIT Test Result: F Repair Due: 8/1/2010  
Test Type: Bradenhead Test FAIL TYPE: Other Internal Failure FAIL CAUSE:  
Comments on MIT: CASING CONTINUOUSLY BUILDS BACK UP PRESSURE AND FLUID; HAS PASSED PRESSURE  
TESTS IN PAST; CONTINUOUS BUILD UP AND FLUID FLOW ON CASING NEEDS TO BE  
ADDRESSED;\*\*\*OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11\*\*\*

**NORTH HOBBS G/SA UNIT No.342****30-025-28884-00-00**

Active Injection - (All Types)

O-29-18S-38E

Test Date: 4/28/2010 Permitted Injection PSI: Actual PSI:  
Test Reason: Annual IMIT Test Result: F Repair Due: 8/1/2010  
Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE:  
Comments on MIT: FAILED PT; CONTINUOUS WATER ON CASING WOULD NOT BLEED DOWN-(200# ON CSG)  
\*\*\*OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11\*\*\*\*

**NORTH HOBBS G/SA UNIT No.223****30-025-28944-00-00**

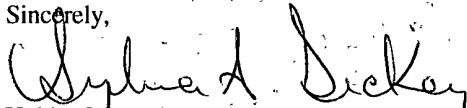
Active Injection - (All Types)

F-32-18S-38E

Test Date: 4/28/2010 Permitted Injection PSI: Actual PSI:  
Test Reason: Annual IMIT Test Result: F Repair Due: 8/1/2010  
Test Type: Std. Annulus Pres. Test FAIL TYPE: Other Internal Failure FAIL CAUSE:  
Comments on MIT: CASING WOULD NOT BLEED DOWN TO CONDUCT PT; \*\*\*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.

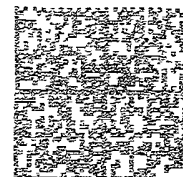
Sincerely,



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.

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