

# 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\*

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05-Oct-10

# MAR OIL & GAS CORP. P.O. BOX 5155 SANTA FE, NM 87502

### 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 <u>immediately</u> 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

#### EUMONT HARDY UNIT No.023 30-025-06216-00-00 Active Injection - (All Types) P-36-20S-37E Test Date: 10/4/2010 Permitted Injection PSI: Actual PSI: Test Reason: Annual IMIT Test Result: F Repair Due: 1/7/2011 Test Type: Bradenhead Test FAIL TYPE: Other Internal Failure FAIL CAUSE: Comments on MIT: PEG'D 600# GAGE \*\*\* "FAILED BHT \*\*\* OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26 11 \*\*\*\* \* EUMONT HARDY UNIT No.013 30-025-06224-00-00 Active Injection - (All Types) H-36-20S-37E Test Date: 10/4/2010 Permitted Injection PSI: Actual PSI: Fest Reason: Annual IMIT Test Result: F **Repair Due:** 1/7/2011 Test Type: Std. Annulus Pres. Test. FAIL TYPE: Other Internal Failure FAIL CAUSE:

Comments on MIT: PESSURE TEST FAILURE, 112 TOPERATOR IN VIOLATION OF NMOCD RULE 19/15/26/11/2020

Oil Conservation Division 1625 N French Drive Hobbs, New Mexico 88240 Phone 505-393-6161 Fax 505-393-0720 http://www.emnid.state.nm.us

EUMONT HA	RDY UNIT No.015			30-025-07865-00-00
		Expired TA Injection - (All Types)		L-31-20S-38E
Test Date:	10/4/2010	Permitted Injection PSI:	Actual PSI:	
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	1/7/2011
Test Type:	Bradenhead Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:	
Comments on M		WATER ON WHAT MAY BE INTERMED IEDIATE STRING WOULD NOT BLEED D		
EUMONT HA	RDY UNIT No.026			30-025-09899-00-00
		Active Injection - (All Types)		C-5-21S-37E
Test Date:	10/4/2010	Permitted Injection PSI:	Actual PSI:	
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	1/7/2011
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:	
Comments on MIT: FAILED PRESSURE TEST Control OPERATOR IN VIOLATION OF NMOCD RULE 19.15 26 11 (201				
EUMONT HARDY UNIT No.037				30-025-09902-00-00
		Active Injection - (All Types)		F-5-21S-37E
Test Date:	10/4/2010	Permitted Injection PSI:	Actual PSI:	
Test Reason:	Annual IMIT	Test Result: F	Repair Due:	1/7/2011
Test Type:	Std. Annulus Pres. Test	FAIL TYPE: Other Internal Failure	FAIL CAUSE:	
Comments on N	MIT: PT FAILURE OPE	ERATOR IN VIOLATION OF NMOCD RUL	E 19 15 26 11**	12 A 42

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

Sincerel Hobbs District Office

COMPLIANCE OFFICEB med 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

