Energy, Minerals and Natural Resources Department

Bill Richardson

Governor

Jim Noel Cabinet Secretary Karen W. Garcia Deputy Cabinet Secretary **Mark Fesmire Division Director** Oil Conservation Division



16-Dec-10

CHEVRON USA INC. HCR 60 BOX 423 LOVINGTON, NM 88260

CHEVRON MIDCONTINENT, L.P.

15 Smith Road Midland TX 79705-0000

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

LOVINGTON SAN ANDRES UNIT No.004

30-025-03778-00-00 B-36-16S-36E

3/30/2011

Approved TA Injection - (All Types) 11/18/2010

Permitted Injection PSI: Actual PSI:

Annual IMIT Test Reason: **Test Result:** Repair Due:

Test Type: Bradenhead Test FAIL TYPE: Other Internal Failure FAIL CAUSE:

*****PRESSURE ON INTERMEDIATE BLED DOWN TO 0- COMMUNICATION BETWEEN **Comments on MIT:**

> INTERMEDIATE AND PRODUCTION CASING-WHILE INTERMEDIATE WAS BLED DOWN CASING PRESSURE DECLINED 50#****FAILED BHT****OPERATOR IN VIOLATION OF NMOCD RULE

19.15.26.11*****

LOVINGTON SAN ANDRES UNIT No.012

30-025-03789-00-00

Active Injection - (All Types)

K-36-16S-36E

Test Date:

11/4/2010

Permitted Injection PSI:

Actual PSI:

3/30/2011 Repair Due:

Test Reason: Test Type:

Test Date:

5-year Test

Test Result:

Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

Comments on MIT:

FAIL CAUSE:

TEST-OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11****

OPERATOR CONCEDES WELL WILL NOT SUSTAIN MECHANICAL INTEGRITY FAILED PRE-

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





LOVINGTON SAN ANDRES UNIT No.003

30-025-03790-00-00

Approved TA Injection - (All Types)

C-36-16S-36E

Test Date:

11/18/2010

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

Test Type: Bradenhead Test FAIL TYPE: Other Internal Failure FAIL CAUSE:

CASING HAS EXCESSIVE PRESSURE: BLED DOWN: COMMENCED TO INCREASE IN PRESSURE Comments on MIT:

WITHIN I MINUTE TO 100#*** FAILED BHT *******OPERATOR IN VIOLATION OF NMOCD RULE

19.15.26.11*****

LOVINGTON PADDOCK UNIT No.029

30-025-03793-00-00

Active Injection - (All Types)

K-36-16S-36E

Test Date:

11/4/2010

Permitted Injection PSI:

Actual PSI:

3/30/2011

3/30/2011

Test Reason:

5-year Test

Test Result:

Repair Due:

Test Type:

Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT:

OPERATOR CONCEDES WELL WILL NOT SUSTAIN MECHANICAL INTEGRITY FAILED PRE-

TEST-OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11****

WEST LOVINGTON UNIT No.035

30-025-03872-00-00

Active Injection - (All Types)

N-4-17S-36E

Test Date:

11/23/2010

Permitted Injection PSI:

Actual PSI:

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

Repair Due:

Test Type: Comments on MIT:

Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

****SHUT IN PENDING EVALUATION***** OPERATOR CONCEDES WELL WILL NOT SUSTAIN MECHANICAL INTEGRITY*** ***OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11*****

WEST LOVINGTON UNIT No.032

30-025-03883-00-00 O-5-17S-36E

3/30/2011

3/30/2011

Active Injection - (All Types)

Test Date: 11/23/2010 **Actual PSI:**

Annual IMIT Test Reason:

Permitted Injection PSI: Test Result:

Repair Due:

Bradenhead Test FAIL TYPE: Other Internal Failure Test Type: FAIL CAUSE:

Comments on MIT:

OILY FLUID ON CASING-DID NOT ATTEMPT TO BLEED DOWN****OPERATOR NEEDS TO BLEED

CASING TO TRUCK-PERFORM PT TO SHOW MECHANICAL INTEGRITY***

LOVINGTON PADDOCK UNIT No.054

30-025-05415-00-00

H-6-17S-37E

Approved TA Injection - (All Types)

Test Date: 11/4/2010 5-year Test **Permitted Injection PSI: Actual PSI:**

Test Reason: Test Type:

Test Result:

Repair Due: 3/30/2011

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

OPERATOR CONCEDES WELL WILL NOT SUSTAIN MECHANICAL INTEGRITY FAILED PRE-**Comments on MIT:**

TEST-OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11****

LOVINGTON PADDOCK UNIT No.051

30-025-05426-00-00 C-6-17S-37E

Active Injection - (All Types)

11/18/2010 Test Date: Test Reason: Annual IMIT

Permitted Injection PSI:

Actual PSI: 3/30/2011 Repair Due:

Test Result: Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

*****EXCESSIVE PRESSURE ON CASING**** ALSO SALT WATER ON SURFACE CASING Comments on MIT: *****FAILED BHT****OPERATOR IN VIOLATION OF NMOCD 19.15.26.11*******

WEST LOVINGTON UNIT No.082

30-025-31266-00-00

Active Injection - (All Types)

11/23/2010 Permitted Injection PSI: G-7-17S-36E

Test Date: Actual PSI:

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

Repair Due: 3/30/2011

Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

******CASING HAD 800# BLED TO 0. CASING COMMENCED TO SHOW OILY FLUID ****FAILED Comments on MIT: BHT****OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11*****

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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.

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Figure Type and "Failure Cause" and the properties 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.

RVATION DIVISION NCH DRIVE I 88240



CHEVRON USA INC. ATTN: COMPLIANCE/REGULATIONS 15 SMITH ROAD MIDLAND, TX 79705

RVATION DIVISION NCH DRIVE I 88240



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12/17/10

CHEVRON USA INC. HCR 60 BOX 423 LOVINGTON, NM 88260