# New Mexico Energy, Minerals and Natural Resources Department

#### Susana Martinez Governor

Harrison R. Schmitt Cabinet Secretary-Designate **Daniel Sanchez** Acting-Division Director Oil Conservation Division



### \*Response Required - Deadline Enclosed\*

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

02-Feb-11 APACHE CORP. 303 VETERANS AIRPARK I ANF STE. 3000 MIDLAND, TX 79705

## 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 MONUMENT G/SA UNIT No.003

30-025-04155-00-00

C-2-20S-36E

Test Date:

1/6/2011

**Permitted Injection PSI:** 

**Actual PSI:** 

Test Reason:

Annual IMIT

Test Result:

Repair Due: 4/11/2011

Test Type:

Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

Active Injection - (All Types)

Active Injection - (All Types)

FAIL CAUSE:

Comments on MIT:

WOULD NOT HOLD PRESSURE \*\*\*FAILED PRESSURE TEST \*\*\*OPERATOR IN VIOLATION OF

30-025-05623-00-00

M-18-19S-37E

NMOCD RULE 19.15.26.11\*\*\*\*

Test Date:

1/10/2011

NORTH MONUMENT G/SA UNIT No.013

**Permitted Injection PSI:** 

**Actual PSI:** 

Test Reason:

**Annual IMIT** 

Test Result:

Repair Due:

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

4/15/2011

Comments on MIT: \*\*\*FAILED PRESSURE TEST\*\*\*\*OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11\*\*\*\*\*

NORTH MONUMENT G/SA UNIT No.004

30-025-05910-00-00 D-5-20S-37E

4/15/2011

4/17/2011

Active Injection - (All Types)

Test Date: 1/10/2011 Permitted Injection PSI:

**Actual PSI:** 

Test Reason:

Annual IMIT

Test Result:

Repair Due:

Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT:

\*\*\*CONTINUOUS FLOW OF FLUID ON SURFACE\*\*\*FAILED BHT\*\*\*OPERATOR IN

VIOLATION OF NMOCD RULE 19.15.26.11\*\*\*\*\*\*

EAST BLINEBRY DRINKARD UNIT No.003

30-025-06325-00-00

Active Injection - (All Types)

**Actual PSI:** 

M-1-21S-37E

Test Date: Test Reason: 1/12/2011

**Permitted Injection PSI:** 

Test Type:

Annual IMIT

Test Result:

Repair Due:

Std. Annulus Pres. Test

FAIL CAUSE:

Comments on MIT:

FAIL TYPE: Other Internal Failure

ATTEMPTED PRESSURE TEST; SURFACE CASING OPEN-OIL FLOW WHEN PRESSURING UP ON WELL TO CONDUCT TEST \*\*\*\*FAILED PRESSURE TEST\*\*\*\*OPERATOR IN VIOLATION OF

NMOCD RULE 19.15.26.11\*\*\* \*\*\*NOTE - PRIOR YEAR FAILURES ON SURFACE CASING \*\*\*NO REPAIRS HAVE BEEN SUBMITTED OR APPROVED TO HOBBS DISTRICT OFFICE.

\*\*NOTE OPERATOR IS SHOWING INJECTION VOLUMES REPORTED\*\*\*

EAST BLINEBRY DRINKARD UNIT No.018

Active Injection - (All Types)

30-025-06479-00-00 A-11-21S-37E

Test Date:

1/12/2011

Permitted Injection PSI:

**Actual PSI:** 

Test Reason:

Annual IMIT

**Test Result:** 

Repair Due:

4/17/2011

Bradenhead Test Test Type:

FAIL CAUSE:

FAIL TYPE: Other Internal Failure

Comments on MIT:

\*\*\*3RD NOTICE OF VIOLATION\*\*\*PRIOR YEAR FAILURES ON PRODUCTION CASING\*\*\*NO REPAIRS HAVE BEEN SUBMITTED OR APPROVED TO HOBBS DISTRICT OFFICE. \*\*NOTE

OPERATOR IS SHOWING INJECTION VOLUMES REPORTED\*\*\*

EAST BLINEBRY DRINKARD UNIT No.031

30-025-06541-00-00

Test Date: 1/12/2011 Active Injection - (All Types)

C-12-21S-37E

Test Reason:

Annual IMIT

Permitted Injection PSI: Test Result:

Actual PSI:

Repair Due: 4/17/2011

Test Type:

Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

**Comments on MIT:** 

ATTEMPTED PT- WELL FAILED DUE TO VACUUM ON CASING \*\*\*\*OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11\*\*\*\*

NORTHEAST DRINKARD UNIT No.805

30-025-06736-00-00 F-22-21S-37E

Test Date:

1/18/2011

Active Injection - (All Types) **Permitted Injection PSI:** 

**Actual PSI:** 

4/23/2011

Test Reason:

**Annual IMIT** 

Test Result:

Repair Due:

Test Type:

Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT:

SOUTH EUNICE SEVEN RIVERS QUEEN UNIT No.427

FAILED PRESSURE TEST \*\*\*\*COMMUNICATION BETWEEN PRODUCTION CASING AND

SURFACE CASING; WHILE PRESSURING UP ON CASING SURFACE CASING SHOWED OILY SALT WATER FLUID; \*\*\*OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11\*\*\*\*\*

> 30-025-09025-00-00 C-25-22S-36E

**Test Date:** 

1/20/2011

Active Injection - (All Types) **Permitted Injection PSI:** 

Actual PSI:

Test Reason:

**Annual IMIT** 

Test Result:

4/25/2011 Repair Due:

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

Comments on MIT: FAILED PRESSURE TEST; \*\*\*OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11\*\*\*\* NORTHEAST DRINKARD UNIT No.103

30-025-09897-00-00

Active Injection - (All Types)

D-3-21S-37E

**Test Date:** 

1/13/2011

Permitted Injection PSI:

**Actual PSI:** 

4/18/2011

Annual IMIT Test Reason: Bradenhead Test Test Type:

**Test Result:** FAIL TYPE: Other Internal Failure

Repair Due: **FAIL CAUSE:** 

FAILED BHT \*\*\*\*COMMUNICATION BETWEEN TUBING AND CASING; CASING=1000#-Comments on MIT: TUBING=1000# \*\*\*\*OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11\*\*\*\*\*

#### NORTH MONUMENT G/SA UNIT No.002B

30-025-12466-00-00

4/11/2011

Active Injection - (All Types)

B-36-19S-36E

**Test Date:** 

1/6/2011

Permitted Injection PSI:

**Actual PSI:** 

Test Reason:

**Annual IMIT** 

**Test Result:** 

Repair Due:

Test Type:

Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

**FAIL CAUSE:** 

Comments on MIT:

WOULD NOT HOLD PRESSURE-FAILED PRESSURE TEST\*\*\*\*OPERATOR IN VIOLATION OF

WEST BLINEBRY DRINKARD UNIT No.023

Active Injection - (All Types)

30-025-21225-00-00 D-9-21S-37E

**Test Date:** 

1/18/2011

Permitted Injection PSI:

Actual PSI:

Test Reason:

**Annual IMIT** 

**Test Result:** 

Repair Due:

4/23/2011

Test Type:

Sincerely

FAIL CAUSE:

Bradenhead Test

FAIL TYPE: Other Internal Failure

Comments on MIT:

FLUID ON SURFACE CASING\*\*\*FAILED BHT\*\*\* OPERATOR IN VIOLATION OF NMOCD RULE

19.15.26.11\*\*\*\*

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



US POSTAGE

APACHE CORP. 303 VETERANS AIRPARK LANE STE. 3000 MIDLAND, TX 79705