



# New Mexico Energy, Minerals and Natural Resources Department

**Susana Martinez**

Governor

**John H. Bemis**

Cabinet Secretary-Designate

**Brett F. Woods, Ph. D.**

Acting Cabinet Secretary

**Jami Bailey**

Division Director

Oil Conservation Division



**\*Response Required – Deadline Enclosed\***  
*Underground Injection Control Program*  
*"Protecting Our Underground Sources of Drinking Water"*

08-Apr-11

**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

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***

**MCA UNIT No.084**

**30-025-00639-00-00**

P-22-17S-32E

Active Injection - (All Types)

Test Date: 3/10/2011

Permitted Injection PSI:

Actual PSI:

Test Reason: Annual IMIT

Test Result: F

Repair Due: 6/13/2011

Test Type: Std. Annulus Pres. Test

FAIL TYPE: Casing

FAIL CAUSE:

Comments on MIT: ANNUAL IMIT (PRESSURE TEST) FAILED. MGB.

**MCA UNIT No.123**

**30-025-00705-00-00**

D-26-17S-32E

Active Injection - (All Types)

Test Date: 3/10/2011

Permitted Injection PSI:

Actual PSI:

Test Reason: Annual IMIT

Test Result: F

Repair Due: 6/13/2011

Test Type: Std. Annulus Pres. Test

FAIL TYPE: Communication Between

FAIL CAUSE:

Comments on MIT: ANNUAL IMIT (PRESSURE TEST) FAILED. MGB.



**EAST VACUUM (GSA) UNIT No.002**

**30-025-02836-00-00**

Active Oil (Producing)

L-20-17S-35E

Test Date: 2/24/2011      Permitted Injection PSI:      Actual PSI:  
Test Reason: Annual IMIT      Test Result: F      Repair Due: 7/7/2011  
Test Type: Bradenhead Test      FAIL TYPE: Other Internal Failure      FAIL CAUSE:  
Comments on MIT: FAILED BHT: WELL PRESENTLY HAS CASING BACKFLOWING TO TANK; NO RISER FROM  
SURFACE CASING: PRODUCTION CASING PROBLEM: \*\*\*\*OPERATOR IN VIOLATION OF  
NMOCD RULE 19.15.26.11\*\*\*\*\*

**EAST VACUUM (GSA) UNIT No.043**

**30-025-02884-00-00**

Active Injection - (All Types)

D-26-17S-35E

Test Date: 3/2/2011      Permitted Injection PSI:      Actual PSI:  
Test Reason: Annual IMIT      Test Result: F      Repair Due: 7/7/2011  
Test Type: Bradenhead Test      FAIL TYPE: Other Internal Failure      FAIL CAUSE:  
Comments on MIT: FAILED BHT: CONTINUOUS PRESSURE ON CASING WOULD NOT BLEED DOWN: \*\*\*OPERATOR  
IN VIOLATION OF NMOCD RULE 19.15.26.11\*\*\*\*\*

**EAST VACUUM (GSA) UNIT No.002**

**30-025-02921-00-00**

Active Injection - (All Types)

H-28-17S-35E

Test Date: 3/2/2011      Permitted Injection PSI:      Actual PSI:  
Test Reason: Annual IMIT      Test Result: F      Repair Due: 7/7/2011  
Test Type: Bradenhead Test      FAIL TYPE: Other Internal Failure      FAIL CAUSE:  
Comments on MIT: FAILED BHT: CONTINUOUS PRESSURE ON CASING STRING: \*\*\*\*OPERATOR IN VIOLATION OF  
NMOCD RULE 19.15.26.11\*\*\*\*\*

**EAST VACUUM (GSA) UNIT No.004**

**30-025-02979-00-00**

Active Oil (Producing)

F-32-17S-35E

Test Date: 2/25/2011      Permitted Injection PSI:      Actual PSI:  
Test Reason: Annual IMIT      Test Result: F      Repair Due: 7/7/2011  
Test Type: Bradenhead Test      FAIL TYPE: Other Internal Failure      FAIL CAUSE:  
Comments on MIT: FAILED BHT: 2ND INTERMEDIATE WOULD NOT BLEED DOWN; 320# PRESSURE CONSISTING  
OF GAS AND LIQUID ON INTERMEDIATE CASING; \*\*\*\*OPERATOR IN VIOLATION OF NMOCD  
RULE 19.15.26.11\*\*\*

**VACUUM ABO UNIT No.003**

**30-025-03045-00-00**

Active Oil (Producing)

C-4-18S-35E

Test Date: 2/25/2011      Permitted Injection PSI:      Actual PSI:  
Test Reason: Annual IMIT      Test Result: F      Repair Due: 7/7/2011  
Test Type: Bradenhead Test      FAIL TYPE: Other Internal Failure      FAIL CAUSE:  
Comments on MIT: \*\*\*\*VIOLATION ON INSPECTION OF INTERMEDIATE AND SURFACE\*\*\*PER MAXEY G. BROWN  
OPERATOR HAS MIRU PULLING UNIT FOR REPAIRS\*\*\*\*\*

**EAST VACUUM (GSA) UNIT No.093**

**30-025-20787-00-00**

Active Oil (Producing)

G-5-18S-35E

Test Date: 2/28/2011      Permitted Injection PSI:      Actual PSI:  
Test Reason: Annual IMIT      Test Result: F      Repair Due: 7/7/2011  
Test Type: Bradenhead Test      FAIL TYPE: Other Internal Failure      FAIL CAUSE:  
Comments on MIT: BHT FAILURE; SURFACE CASING WOULD NOT BLEED DOWN; PER OPERATOR REP. HAS WORK  
ORDER TO REPAIR SURFACE CASING IN PROCESS: \*\*\*\*OPERATOR IN VIOLATION OF NMOCD  
RULE 19.15.26.11\*\*\*\*\*

**LEA No.031**

**30-025-21728-00-00**  
C-30-17S-34E

Active Oil (Producing)

|                         |                                                                                                                                                                                                                                                                                                                                             |                                 |                        |                    |          |
|-------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|------------------------|--------------------|----------|
| <b>Test Date:</b>       | 3/7/2011                                                                                                                                                                                                                                                                                                                                    | <b>Permitted Injection PSI:</b> |                        | <b>Actual PSI:</b> |          |
| <b>Test Reason:</b>     | Annual IMIT                                                                                                                                                                                                                                                                                                                                 | <b>Test Result:</b>             | F                      | <b>Repair Due:</b> | 7/7/2011 |
| <b>Test Type:</b>       | Bradenhead Test                                                                                                                                                                                                                                                                                                                             | <b>FAIL TYPE:</b>               | Other Internal Failure | <b>FAIL CAUSE:</b> |          |
| <b>Comments on MIT:</b> | FAILED BHT; CONTINUOUS BLOW OF GAS ON SURFACE; PRESSURE BUILDS BACK UP IMMEDIATELY ON SURFACE CASING; ALSO PRIOR OIL STAIN OFF SURFACE CASING AND CHECK VALVE ON FLOWLINE FROM PRODUCTION CASING; PER OPERATOR REP. WORK ORDER IN PROCESS FOR PULLING UNIT REPAIR ON SURFACE CASING: *****OPERTOR IN VIOLATION OF NMOCD RULE 19.15.26.11*** |                                 |                        |                    |          |

**MCA UNIT No.273**

**30-025-23730-00-00**  
L-26-17S-32E

Active Injection - (All Types)

|                         |                         |                                 |                       |                    |           |
|-------------------------|-------------------------|---------------------------------|-----------------------|--------------------|-----------|
| <b>Test Date:</b>       | 3/10/2011               | <b>Permitted Injection PSI:</b> |                       | <b>Actual PSI:</b> |           |
| <b>Test Reason:</b>     | Annual IMIT             | <b>Test Result:</b>             | F                     | <b>Repair Due:</b> | 6/13/2011 |
| <b>Test Type:</b>       | Std. Annulus Pres. Test | <b>FAIL TYPE:</b>               | Communication Between | <b>FAIL CAUSE:</b> |           |
| <b>Comments on MIT:</b> | MIT FAILED. MGB.        |                                 |                       |                    |           |

**EAST VACUUM (GSA) UNIT No.129**

**30-025-24906-00-00**  
E-5-18S-35E

Active Injection - (All Types)

|                         |                                                                                                            |                                 |                        |                    |          |
|-------------------------|------------------------------------------------------------------------------------------------------------|---------------------------------|------------------------|--------------------|----------|
| <b>Test Date:</b>       | 2/23/2011                                                                                                  | <b>Permitted Injection PSI:</b> |                        | <b>Actual PSI:</b> |          |
| <b>Test Reason:</b>     | Annual IMIT                                                                                                | <b>Test Result:</b>             | F                      | <b>Repair Due:</b> | 7/7/2011 |
| <b>Test Type:</b>       | Std. Annulus Pres. Test                                                                                    | <b>FAIL TYPE:</b>               | Other Internal Failure | <b>FAIL CAUSE:</b> |          |
| <b>Comments on MIT:</b> | FAILED PRESSURE TEST; WELL WOULD NOT HOLD PRESSURE: ***OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11**** |                                 |                        |                    |          |

**EAST VACUUM (GSA) UNIT No.009**

**30-025-26518-00-00**  
O-32-17S-35E

Active Injection - (All Types)

|                         |                                                                                                            |                                 |                        |                    |          |
|-------------------------|------------------------------------------------------------------------------------------------------------|---------------------------------|------------------------|--------------------|----------|
| <b>Test Date:</b>       | 3/2/2011                                                                                                   | <b>Permitted Injection PSI:</b> |                        | <b>Actual PSI:</b> |          |
| <b>Test Reason:</b>     | Annual IMIT                                                                                                | <b>Test Result:</b>             | F                      | <b>Repair Due:</b> | 7/7/2011 |
| <b>Test Type:</b>       | Bradenhead Test                                                                                            | <b>FAIL TYPE:</b>               | Other Internal Failure | <b>FAIL CAUSE:</b> |          |
| <b>Comments on MIT:</b> | FAILED BHT: CONTINUOUS PRESSURE ON CASING STRING: ****OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11***** |                                 |                        |                    |          |

**EAST VACUUM (GSA) UNIT No.003**

**30-025-26520-00-00**  
M-33-17S-35E

Active Injection - (All Types)

|                         |                                                                                                               |                                 |                        |                    |          |
|-------------------------|---------------------------------------------------------------------------------------------------------------|---------------------------------|------------------------|--------------------|----------|
| <b>Test Date:</b>       | 3/2/2011                                                                                                      | <b>Permitted Injection PSI:</b> |                        | <b>Actual PSI:</b> |          |
| <b>Test Reason:</b>     | Annual IMIT                                                                                                   | <b>Test Result:</b>             | F                      | <b>Repair Due:</b> | 7/7/2011 |
| <b>Test Type:</b>       | Bradenhead Test                                                                                               | <b>FAIL TYPE:</b>               | Other Internal Failure | <b>FAIL CAUSE:</b> |          |
| <b>Comments on MIT:</b> | BHT FAILURE: ***CONTINUOUS PRESSURE ON CASING STRING: ****OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11**** |                                 |                        |                    |          |

**EAST VACUUM (GSA) UNIT No.007**

**30-025-26649-00-00**  
K-32-17S-35E

Active Injection - (All Types)

|                         |                                                                                                          |                                 |                        |                    |          |
|-------------------------|----------------------------------------------------------------------------------------------------------|---------------------------------|------------------------|--------------------|----------|
| <b>Test Date:</b>       | 3/2/2011                                                                                                 | <b>Permitted Injection PSI:</b> |                        | <b>Actual PSI:</b> |          |
| <b>Test Reason:</b>     | Annual IMIT                                                                                              | <b>Test Result:</b>             | F                      | <b>Repair Due:</b> | 7/7/2011 |
| <b>Test Type:</b>       | Bradenhead Test                                                                                          | <b>FAIL TYPE:</b>               | Other Internal Failure | <b>FAIL CAUSE:</b> |          |
| <b>Comments on MIT:</b> | FAILED BHT: CONTINUOUS PRESSURE ON CASING STRING: ***OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11**** |                                 |                        |                    |          |

**EAST VACUUM (GSA) UNIT No.001**

**30-025-26777-00-00**  
M-27-17S-35E

Active Injection - (All Types)

|                         |                                                                                                           |                                 |                        |                    |          |
|-------------------------|-----------------------------------------------------------------------------------------------------------|---------------------------------|------------------------|--------------------|----------|
| <b>Test Date:</b>       | 3/2/2011                                                                                                  | <b>Permitted Injection PSI:</b> |                        | <b>Actual PSI:</b> |          |
| <b>Test Reason:</b>     | Annual IMIT                                                                                               | <b>Test Result:</b>             | F                      | <b>Repair Due:</b> | 7/7/2011 |
| <b>Test Type:</b>       | Bradenhead Test                                                                                           | <b>FAIL TYPE:</b>               | Other Internal Failure | <b>FAIL CAUSE:</b> |          |
| <b>Comments on MIT:</b> | FAILED BHT: CONTINUOUS PRESSURE ON CASING STRING: ****OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11**** |                                 |                        |                    |          |

**EAST VACUUM (GSA) UNIT No.008**

**30-025-26865-00-00**  
E-32-17S-35E

Active Injection - (All Types)

|                         |                                                                                                            |                                 |                        |                    |          |
|-------------------------|------------------------------------------------------------------------------------------------------------|---------------------------------|------------------------|--------------------|----------|
| <b>Test Date:</b>       | 3/2/2011                                                                                                   | <b>Permitted Injection PSI:</b> |                        | <b>Actual PSI:</b> |          |
| <b>Test Reason:</b>     | Annual IMIT                                                                                                | <b>Test Result:</b>             | F                      | <b>Repair Due:</b> | 7/7/2011 |
| <b>Test Type:</b>       | Bradenhead Test                                                                                            | <b>FAIL TYPE:</b>               | Other Internal Failure | <b>FAIL CAUSE:</b> |          |
| <b>Comments on MIT:</b> | FAILED BHT: CONTINUOUS PRESSURE ON CASING STRING; ****OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11***** |                                 |                        |                    |          |

**EAST VACUUM (GSA) UNIT No.006**

**30-025-27116-00-00**  
H-27-17S-35E

Active Injection - (All Types)

|                         |                                                                                                                     |                                 |                        |                    |          |
|-------------------------|---------------------------------------------------------------------------------------------------------------------|---------------------------------|------------------------|--------------------|----------|
| <b>Test Date:</b>       | 3/2/2011                                                                                                            | <b>Permitted Injection PSI:</b> |                        | <b>Actual PSI:</b> |          |
| <b>Test Reason:</b>     | Annual IMIT                                                                                                         | <b>Test Result:</b>             | F                      | <b>Repair Due:</b> | 6/5/2011 |
| <b>Test Type:</b>       | Bradenhead Test                                                                                                     | <b>FAIL TYPE:</b>               | Other Internal Failure | <b>FAIL CAUSE:</b> |          |
| <b>Comments on MIT:</b> | FAILED BHT: CONTINUOUS PRESSURE BUILD UP ON CASING STRING; ****OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11***** |                                 |                        |                    |          |

**EAST VACUUM (GSA) UNIT No.600**

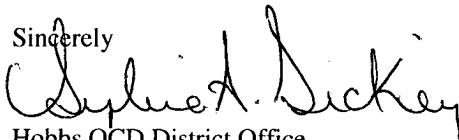
**30-025-27345-00-00**  
B-27-17S-35E

Active Injection - (All Types)

|                         |                                                                                                             |                                 |                        |                    |          |
|-------------------------|-------------------------------------------------------------------------------------------------------------|---------------------------------|------------------------|--------------------|----------|
| <b>Test Date:</b>       | 2/22/2011                                                                                                   | <b>Permitted Injection PSI:</b> |                        | <b>Actual PSI:</b> |          |
| <b>Test Reason:</b>     | Annual IMIT                                                                                                 | <b>Test Result:</b>             | F                      | <b>Repair Due:</b> | 7/7/2011 |
| <b>Test Type:</b>       | Std. Annulus Pres. Test                                                                                     | <b>FAIL TYPE:</b>               | Other Internal Failure | <b>FAIL CAUSE:</b> |          |
| <b>Comments on MIT:</b> | FAILED PRESSURE TEST: WELL WOULD 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.

Sincerely



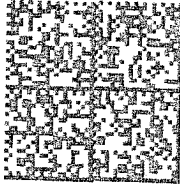
Hobbs OCD District Office

**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.

EMNRD  
OIL CONSERVATION DIVISION  
1625 N FRENCH DRIVE  
HOBBS NM 88240

CONOCOPHILLIPS COMPANY  
3300 N. 'A' STREET  
BLDG. 6 #247  
MIDLAND, TX 79710



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