

# NEW MEXICO ENERGY, MINERALS 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"

11-May-11

### OCCIDENTAL PERMIAN LTD

1017 W STANOLIND ROAD

## 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.412

30-025-05468-00-00

Approved TA Oil (Producing)

A-23-18S-37E

Test Date:

5/3/2011

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

8/6/2011

Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT:

BHT FAILURE SURFACE CASING HAS SALT WATER WILL NOT BLEED DOWN \*\*\*\*OPERATOR

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

NORTH HOBBS G/SA UNIT No.121

30-025-05502-00-00

Approved TA Injection - (All Types)

E-25-18S-37E

Test Date:

4/27/2011

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due: 7/31/2011

Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: PrESSURE ON CASING WOULD NOT BLEED DOWN; FAILED BHT: \*\*\*\*OPERATOR IN

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

NORTH HOBBS G/SA UNIT No.431

30-025-07474-00-00 I-30-18S-38E

Active Oil (Producing)

Test Date: 4/28/2011 Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

Test Type:

F

Bradenhead Test

FAIL TYPE: Other Internal Failure

Comments on MIT:

FAIL CAUSE:

H2S ON SURFACE CASING FAILED BHT 2PPM \*\*\*\*\*OPERATOR IN VIOLATION OF NMOCD

RULE 19.15.26.11\*\*\*\*

NORTH HOBBS G/SA UNIT No.331

30-025-07538-00-00 J-32-18S-38E

8/1/2011

Test Date:

5/9/2011

Active Injection - (All Types) Permitted Injection PSI:

Actual PSI:

Test Reason:

Test Type:

Annual IMIT

Test Result:

Repair Due:

Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: FAILED PT DID NOT LOAD WENT ON VACUUM; \*\*\*OPERATOR IN VIOLATION OF NMOCD

RULE 19.15.26.11\*\*\*\*

NORTH HOBBS G/SA UNIT No.341 Active Injection - (All Types)

30-025-07539-00-00

O-32-18S-38E

Test Date:

4/28/2011

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

8/12/2011

Test Type:

Bradenhead Test

8/1/2011

Comments on MIT:

FAIL TYPE: Other Internal Failure OIL ON INTERMEDIATE CASING DID NOT BLEED DOWN; \*\*\*OPERATOR IN VIOLATION OF

FAIL CAUSE:

NMOCD RULE 19.15.26.11\*\*\*\*\*

NORTH HOBBS G/SA UNIT No.221

Active Injection - (All Types)

30-025-07560-00-00 F-33-18S-38E

Test Date:

5/9/2011

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

8/12/2011

Test Type:

Std. Annulus Pres. Test

FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT:

SOUTH HOBBS G/SA UNIT No.053

Active Injection - (All Types)

30-025-07612-00-00 M-4-19S-38E

Test Date:

5/4/2011

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

Repair Due:

8/7/2011

Test Type: Bradenhead Test FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: \*\*\*FAILED BHT\*\*\*\*\*OPERATOR SUBMITTED NOI TO CHECK CASING\*\*\*\*WELL FAILED BHT

NMOCD RULE 19.16.26.11\*\*\*\*

5/4/2011 DUE TO CONTINUOUS BLOW ON SURFACE CASING AND CONTINUOUS BLOW ON PRODUCTION CASING \*\*\*\*OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11\*\*\*\*\*

SOUTH HOBBS G/SA UNIT No.066

30-025-07672-00-00 D-10-19S-38E

Test Date:

Active Injection - (All Types) Permitted Injection PSI:

Test Reason:

5/2/2011 Annual IMIT

Test Result:

Actual PSI:

Repair Due: 8/5/2011

Test Type:

Bradenhead Test

FAIL TYPE: Other Internal Failure

Approved TA Injection - (All Types)

FAIL CAUSE:

\*\*\*FAILED BHT CASING WOULD NOT BLEED DOWN\*\*\*\*\*OPERATOR IN VIOLATION OF Comments on MIT: NMOCD RULE 19.15.26.11\*\*\*\*\*\*

SOUTH HOBBS G/SA UNIT No.068

30-025-07679-00-00

Test Date:

5/2/2011

Permitted Injection PSI:

Actual PSI:

B-10-19S-38E

8/5/2011

Test Reason:

Annual IMIT

Test Result:

Repair Due:

Test Type: FAIL TYPE: Other Internal Failure Bradenhead Test FAIL CAUSE: \*\*\*FAILED BHT TA'D WELL CASING WOULD NOT BLEED\*\*\*OPERATOR IN VIOLATION OF Comments on MIT:

#### NORTH HOBBS G/SA UNIT No.341

Active Oil (Producing)

30-025-24665-00-00

O-30-18S-38E

Test Date:

5/4/2011

Permitted Injection PSI:

Actual PSI:

Test Reason:

Annual IMIT

Test Result:

F

Repair Due:

Test Type:

Comments on MIT:

Bradenhead Test FAIL TYPE: Other Internal Failure FAIL CAUSE:

\*\*\*\*FAILED 2ND BHT FOR SURFACE CASING 180# DID NOT HAS H2S MEASUREMENT/ DOES

HAVE C02. BUILDS BACK UP IMMEDIATELY. \*\*\*\*OPERATOR IN VIOLATION OF NMOCD RULE

19.15.26.11\*\*\*\*

NORTH HOBBS G/SA UNIT No.242

30-025-28413-00-00

Test Date:

5/3/2011

Active Injection - (All Types) Permitted Injection PSI:

N-29-18S-38E

Test Reason:

Test Result:

Actual PSI:

8/6/2011

8/1/2011

Annual IMIT

Repair Due:

Test Type:

FAIL TYPE: Other Internal Failure Bradenhead Test

FAIL CAUSE:

Comments on MIT: FAILED BHT CASING WOULD NOT BLEED DOWN \*\*\*\*OPERATOR IN VIOLATION OF NMOCD RULE 19.15.26.11\*\*\*\*\*

NORTH HOBBS G/SA UNIT No.547

Active Oil (Producing)

30-025-36242-00-00 P-30-18S-38E

Test Date:

4/28/2011

Permitted Injection PSI:

Actual PSI

Test Reason: Test Type:

Annual IMIT

Test Result:

Repair Due:

Bradenhead Test FAIL TYPE: Other Internal Failure

FAIL CAUSE:

Comments on MIT: FAILED BHT DUE TO SURFACE CASING; 2ND BHT CHECK SHOWS 680# ON SURFACE CASING;

C02PRESSURE BUILDS BACK UP IMMEDIATELY \*\*\*\*OPERATOR IN VIOLATION OF NMOCD

RULE 19.15.26.11\*\*\*\*

NORTH HOBBS G/SA UNIT No.546

30-025-36280-00-00

Active Oil (Producing)

I-30-18S-38E

Test Date:

5/4/2011

Permitted Injection PSI:

Actual PSI: Repair Due: 8/7/2011

Test Reason: Test Type:

Annual IMIT Bradenhead Test

Test Result: FAIL TYPE: Other Internal Failure

FAIL CAUSE:

\*\*\*2ND BHT FOR SURFACE CASING 100#. BLED OFF AND BUILDS BACK UP ON SURFACE Comments on MIT: CASING. 6 PPM HS2 ON SURFACE WILL FAIL AT THIS TIME\*\*\*\* CPROX WELL\*\*\*\*

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

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



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