

Pursuant to the request of the County Commission at the last meeting concerning Oil and Gas regulations, below are the OCD recommendation for rules with respect to the inspection of Injection wells and Flow lines.

INJECTION WELLS

Rule (): All injection wells with a surface location in the county shall be subject to the testing requirements of New Mexico Oil Conservation Division (“Division”) rule 19.15.9.704 (A), except that such testing shall be conducted at a minimum of once every _____ years, and not a minimum of once every five years as required in 19.15.9.704(A)(2). When OCD Rule 704 requires notification of the Division, the Operator shall also notify the county. A copy of all forms, reports, notes or other documents resulting from such test and filed with the Division shall be filed with the County within the time period specified for filing with the Division.

FLOW LINE TESTING

Rule (): Surface and buried flowlines shall be tested once every _____ years. Such flowlines shall be shut in, isolated and pressure tested using inert gas to a pressure equaling the API test pressure or manufacturers recommended test pressure for the tested pipe. The tested line shall hold pressure for a period of thirty minutes and shall experience no more than a 5% pressure decrease during that thirty minute period.

The operator shall notify the county no less than 72 hours prior to the test and shall provide sufficient information to allow a county representative to be present during the test. Each operator shall report the results of the test to the county no more than 30 days after the completion of each test. Such report shall be signed by the operators’ representative present during the testing and shall attest to the accuracy of the information provided.

Our Rule 21 (the Otero Mesa Rule) requires annual testing of the mechanical integrity of injection wells, although I left the time period blank here. If you need anything else, please don’t hesitate to call.

Sincerely,

Mark Fesmire, OCD Director