Caller Service 4104 Parmington, New Ferico 87499

Pun #2 J.9-23~ Jw

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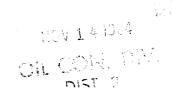
Union Texas Petroleum Corporation P. C. Box 1290 Farmington, NY 87499

Gentlemen:

Enclosed with no action taken is your Sundry Notice of October 24, 1984, for your well No. 2 Dunn, 1768' FSL and 2235' FFL, sec. 9, T. 23 M., k. 7 M., San Juan County, New Mexico, Federal lease SF-078272-A. The intent is to redrill an existing hole through the Ojo Alamo formation and attempt a cement squeeze, in the Ojo, to fracture (hopefully) into a wellbore that was inadvertantly sidetracked in a plastic shale section. You indicate that NMOCD has requested this action.

After carefully considering the proposed action and the potential ramifications it is the position of the BLM to deny the proposal, for the following reasons:

- 1. The original wellbore was closed off by plastic shale in the vicinity of 600'-650' and subsequent attempts to re-enter it resulted in inadvertant sidetracks. It is very unlikely that a drill bit will follow a cement plug through a section of plastic shale and another sidetrack would result in the drilling of an additional hole through the Ojo Alamo.
- 2. The holes have been plugged, by Union Texas in a manner that falls short of our normal requirements but in a manner that was about the best that could be reasonably expected under the conditions existing at the time.
- 3. It is felt that an effort to drill through the Ojo Alamo and fracture into the old wellbore may create further problems, and could conceivably result in an uncontrolable situation. The well was in a stable condition at the time the bole was lost and may reasonably be expected to remain as such unless disturbed. If the cement squeeze would fracture into the original wellbore, the influx of fluids could create pressures which may result in an uncontrolled fracturing of the wellbore with unpredictible results such as; (1) an underground blowout condition, (2) pressuring up of a porous zone which may presently contain non-hazardous pressures, (3) subsurface contamination of formations due to crossflow from other formations, (4) loss of bydrocarbon reserves due to the breaching of the reservoir.
- 4. The proposed action is little wore than a shot in the dark with very low probability of attaining the desired objectives and no way of verifying the results. It also has as much or wore potential for creating further damage.



The existing abandoned well appears to be stable and as such should be left undisturbed, unless or until someone can provide a proposal that assures a higher degree of safety and protection to the environment, both subsurface and surface. The fracturing /cementing of the 0.10 Alamo arbitrarily would have a very remote chance of attaining constructive results.

We will ask our Albuquerque District Office to review this matter.

Sincerely yours,

Ist J. Stan McKee

%7. Area Manager

Enclosure

cc: NMOCD (Aztec)/