

1 STATE OF NEW MEXICO

COUNTY OF SAN JUAN

2 IN THE DISTRICT COURT

3
4 NEW MEXICO OIL CONSERVATION
5 COMMISSION,

6 Plaintiff,

7 vs.

No. 78-241

8 NOEL REYNOLDS,

9 Defendant.

10
11 A N S W E R

12 Comes now the Defendant and for his Answer:

13 (1) Admits the allegations of I and III through VI.

14 (2) Denies the allegations of II and VII and affirm-
15 tively states that only recently did Defendant become the owner
16 of the Federal oil and gas lease on which the well complained of
17 is located, and affirmatively alleges that he has applied to the
18 federal authorities for permission to re-enter and cement said
19 hole, a copy of his proposal being attached hereto.

20 (3) Denies the allegations of IX and denies the remain-
21 der of the allegations of the complaint insofar as they pertain
22 to the hole or well in this case, and affirmatively alleges that
23 it is necessary to produce the water well in order that the
24 United States of America may realize its just share of the oil and
25 gas beneath its lands.

26 (4) Defendant further affirmatively alleges that he
27 has made arrangements with Coleman Drilling Company to re-enter
28 the hole, but that all rigs, not just those of Coleman, in north-
29 west New Mexico are extremely busy and cannot be obtained quickly.

30 WHEREFORE Defendant prays that he be allowed to complete his re-
31
32



1 entry and workover of the water well for his production purposes
2 without penalty.

Marvin Baggett

MARVIN BAGGETT
Attorney for Defendant
109 Northwest Energy Building
Farmington, New Mexico 87401

I hereby certify that a copy of the
foregoing pleading was mailed to
opposing counsel of record this
3 day of April

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

SUBMIT IN TRIPLICATE*
(Other instructions on reverse side)

Form approved.
Budget Bureau No. 42-R1424

SUNDRY NOTICES AND REPORTS ON WELLS

(Do not use this form for proposals to drill or to deepen or plug back to a different reservoir.
Use "APPLICATION FOR PERMIT—" for such proposals.)

1. <input type="checkbox"/> OIL WELL <input type="checkbox"/> GAS WELL <input type="checkbox"/> OTHER <u>Water Supply Well</u>		5. LEASE DESIGNATION AND SERIAL NO <u>S F 081160-F</u>
2. NAME OF OPERATOR <u>Noel Reynolds</u>		6. IF INDIAN, ALLOTTEE OR TRIBE NAME
3. ADDRESS OF OPERATOR <u>Box 356 Flora Vista N.M. 87415</u>		7. UNIT AGREEMENT NAME
4. LOCATION OF WELL (Report location clearly and in accordance with any State requirements.* See also space 17 below.) At surface <u>1980' From South Line, 2310' From East Line</u> <u>Sec. 21, Township 18N, Range 3 W</u>		8. FARM OR LEASE NAME <u>Torreón</u>
14. PERMIT NO.		9. WELL NO. <u>Water Well No 1</u>
15. ELEVATIONS (Show whether DF, RT, GR, etc.) <u>6800 GL</u>		10. FIELD AND POOL, OR WILDCAT <u>San Luis Mesa Verde</u>
		11. SEC., T., R., M., OR BLE. AND SURVEY OR AREA <u>Sec 21</u> <u>T18N, R3W</u>
		12. COUNTY OR PARISH <u>Sandoval</u>
		13. STATE <u>N.M.</u>

16. Check Appropriate Box To Indicate Nature of Notice, Report, or Other Data

NOTICE OF INTENTION TO:

TEST WATER SHUT-OFF <input type="checkbox"/>	PULL OR ALTER CASING <input type="checkbox"/>
FRACTURE TREAT <input type="checkbox"/>	MULTIPLE COMPLETE <input type="checkbox"/>
SHOOT OR ACIDIZE <input type="checkbox"/>	ABANDON* <input type="checkbox"/>
REPAIR WELL <input type="checkbox"/>	CHANGE PLANS <input type="checkbox"/>
(Other) <u>Completion</u>	<u>X</u>

SUBSEQUENT REPORT OF:

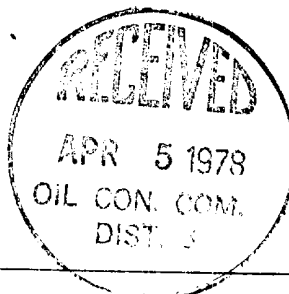
WATER SHUT-OFF <input type="checkbox"/>	REPAIRING WELL <input type="checkbox"/>
FRACTURE TREATMENT <input type="checkbox"/>	ALTERING CASING <input type="checkbox"/>
SHOOTING OR ACIDIZING <input type="checkbox"/>	ABANDONMENT* <input type="checkbox"/>
(Other) <input type="checkbox"/>	

(NOTE: Report results of multiple completion on Well Completion or Recompletion Report and Log form.)

17. DESCRIBE PROPOSED OR COMPLETED OPERATIONS (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work. If well is directionally drilled, give subsurface locations and measured and true vertical depths for all markers and zones pertinent to this work.) *

Operator proposes to reinter Torreón #1 well, Originally drilled by Petroleum Development Corporation.
Run 4½" 10.50 J55 Casing to TD (4660') With stage collar @ 1450'
Cement lower section with 60 Sx. 210' fill-up
Cement upper section with 269 Sx. 900' fill-up

Perforate the Entrada formation and complete for a water supply well for Proposed water-flood project.
Work to begin by April 15 1978, Subject to Rig availability.



RECEIVED

APR 4 1978

U. S. GEOLOGICAL SURVEY
DURANGO, COLO.

18. I hereby certify that the foregoing is true and correct

SIGNED Noel Reynolds

TITLE operator

DATE 4/1/ 78

(This space for Federal or State office use)

APPROVED BY

TITLE

DATE

CONDITIONS OF APPROVAL, IF ANY:

~~DISTANCE OF WELL FROM~~
*See Instructions on Reverse Side

Replacement page - and filed not being