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September 14, 1988

Ron Fellows Area Manager Bureau of Land Management Farmington Resource Area 1235 La Plata Highway Farmington, New Mexico 87401

Subject: Carson Unit Wells SF-078064 et. al. (WC)

3162.3-4 (019)

OIL COM. DIV

\ DIST. 3

Dear Mr. Fellows:

The intents to plug and abandon the seven wells addressed in your August 15, 1988 letter were submitted by Shell Oil from 1975 to 1977 who, as operator at the time, had adopted a massive plugging program in the Carson unit due to the low price of oil. Hixon Development Company purchased the Carson Unit on May 1, 1982 and assumed operatorship. Since that time the Unit has produced 180,651 barrels of oil and 182,259 mcf of casinghead gas from the Bisti Lower Gallup.

The Carson Unit has 4.8 million barrels of remaining recoverable oil. This unit has been actively waterflooded since 1962. To recover these remaining reserves it is critical that all existing wellbores be kept available for use as injection and/or producing wells. Future waterflooding and enhanced recovery operations are dependent on use of all available wellbores. To plug any wells in the unit would mean the loss of recoverable hydrocarbons and result in the loss of revenue to the producer and royalties to the Federal Government.

We are currently making an in-depth study of the Carson Unit's waterflood and production operations. Included in the study are future plans to return additional wells to production and injection as the price of oil increases.

In addition to the waterflood study, we are also initiating a study of the Fruitland Coal in the Unit. This study is the first step in evaluating the Unit's untapped coal gas potential. The study will be followed by extensive testing of the Fruitland Coal using existing wellbores in the Unit

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Hixon Development Company does not wish to plug the seven addressed wells and requests that the wells be kept in a shut-in status to allow them to be utilized in future production operations.

Please contact the undersigned at (505) 326-3325 if you have any questions.

Sincerely,

Bruce C. Delventhal

Bruce E. Delventhal Vice President - Operations

## BED/das

1. No. 33-13 Carson Unit, Mt/451/4 sec. 13, T. 25 M., d. 12 M., Tan June Founty, New Mexico, lease Sx+078654, Intention to Abordon arrenaed August 22, 1977.

2. No. 34-24 Careon Dutt, SW/486/4 sec. 24, T. 25 M., R. 12 W., Son John County, New Newtoo, lease SF-075064, Intention to Alandon approved Country 8, 1977.

2. No. 34-14 Caraon Unit, Sb/4SF/A sec. 74, T. 25 N., R. 12 W., Sen Juan County, New Yexfao, lense SF-072057, Intention to Abendon approved Cetaler 14, 1975.

S. Sc. 14-14 Carbon Unit, SV/4SM/4 sec. 14, T. 25 N., 3. 12 U., Eun Juan County, New Mexico, lease SF-076007. Intention to Abandon approved fatoler 14, 1975.

1. Vic. 31-15 Cornon Init, SWANE/4 sec. 15, 1. 25 N., A. 12 W., Sen June tounty, New Prizeco, lence 54-070322, Intention to Alandon approved October 1, 1873.

0.1 To. 43-15 Carson Unit, METASETA sec. 15, T. 25 N., R. 12 W., San Juan Courty, New Ferice, lease MM-070342. Intention to Abardon approved Ortolys 1, 1975.

7. Fo. 23-19 Carson boit, ME/489/4 sec. 19, T. 25 N., R. 11 W., Ear Juan County, New Mexico, lease SP-675663, Intention to Mandon approved October 4, 1977.