

Denver/Colorado ◆ Durango/Colorado ◆ Carlsbad/New Mexico

March 2, 2000

Mr. Charlie Perrin New Mexico Oil & Gas Conservation Division 1000 Rio Brazos Road Aztec, New Mexico 87410

Re: Simms Federal #1 Water Disposal Well NW SE Sec.13, T30N, R4W East Blanco Field Rio Arriba County, NM



Dear Mr. Perrin,

In accordance with our telephone conversation please accept this letter as Mallon Oil Company's recognition and acceptance of the conditions of approval for an exemption to running a coated/lined tubing in the Simms Federal #1 water disposal well. The approved water disposal permit (SWD-665) requested that coated/lined tubing be ran in this well. Under normal injection operations, we are injecting approximately 1,800 BWPD with the addition of approximately 30 MCFD of hydrogen sulfide gas. The well is presently set up with all L-80 tubing for the 2 7/8" and 2 1/16" tubing string (Non-coated). The crossovers and packer are nickel plated which holds up very well to the hydrogen sulfide gas. A verbal exemption has been given to Mallon Oil Company by the New Mexico Oil & Gas Conservation Division to leave the non-coated tubing in the well under the following conditions:

- 1) A mechanical integrity test will be preformed to confirm the integrity of the casing and the squeezed perforations intervals as soon as possible.
- 2) A mechanical integrity test will be preformed every six months to confirm the integrity of the casing and squeezed perforation intervals.
- 3) If the well at any time fails an MIT, the non-coated tubing will be pulled from the well and a coated/lined tubing will be ran back into the well after the well has been repaired.
- 4) If the tubing has not been pulled and replaced with coated/lined tubing after a period of two years, the tubing string will be pulled and replaced with coated/lined tubing.

A mechanical integrity test was performed on February 24, 2000 which was witnessed and passed by Bruce Martin with the New Mexico OCD (Aztec Office). This well will be tested again on or before August 24, 2000 for casing integrity. Please refer to the attached diagrams and MIT report.

Sincerely,

John Zellitti

Senior Production Engineer

(970-382-9100)

CC: Mark Ashley

BLM



NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION AZTEC DISTRICT OFFICE 1000 RIO BRAZOS ROAD AZTEC HM 87410 [506] 334-4178 FAX: (505) 334-4170 http://emnrd.state.nm.us/ood/District H/Jdistric.htm

MECHANICAL INTEGRITY TEST REPORT (TA or UIC)

| Date of Test 2/24/2000 Operation | or Mallon O.1 Co API | #30-039-22756 |
|---|----------------------------|---------------------|
| Property Name Simus Feel | • | ec 13 Twn 30 Rge 4 |
| Land Type: | | |
| State | Well Type: | njection |
| Federal | Salt Water D | ijection |
| Private Indian_X | Gas Ir | jection |
| | Producing (| Oil/Gas ervation |
| Temporarily Abandoned Well (YN) | TAR | |
| . , , , | TA Expires: | |
| Casing Pres. | Tbg. SI Pres. | Man Lin |
| Bradenhead Pres. ———————————————————————————————————— | Tbg. Inj. Pres. | Max. Inj. Pres |
| Int. Casing Pres. | | |
| | | |
| Pressured annulus up to 378 psi. for 3 | mins. Test(passed) failed | |
| Casing pressure | Duppad to 350 psi - 1p= 28 | 3psi |
| | DECE | ARV |
| | JAN 1 | 3 2000 |
| | | |
| Operator Removable | Witness Sur Monti | , 3 |
| (Operator Representativė) | (NMOCD) | |
| Field Foreman. (Position) | _ | REVISED 11-17-98 |



