



Kay C. Havenor, Ph.D

Office: 575-626-4518
e-mail: KHavenor@GeoResources.com
904 Moore Ave
Roswell, New Mexico 88201-1144

RECEIVED OCD

2013 SEP 23 P 1:31

September 19, 2013

Ms. Jamie Bailey, Director
NM Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Request Extension SWD-1306
Cotton Draw Unit #66
30-025-22024 Lea Co. NM

Dear Ms. Bailey:

As agent for Mesquite SWD, Inc., Carlsbad, NM, this is a request for an extension of one year to re-enter and complete the subject well for salt water disposal.

This time request is considered necessary due to significant delays in permitting by BLM and the need to thereafter obtain electrical service at this location.

This SWD permit is scheduled to expire October 27th, 2013.

Your assistance in this extension will be greatly appreciated.

Respectfully yours,

A handwritten signature in black ink that reads "Kay Havenor". The signature is written in a cursive, flowing style.

Kay Havenor
Agent



New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

John H. Bemis
Cabinet Secretary-Designate

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

Jami Bailey
Division Director
Oil Conservation Division



Administrative Order SWD-1306
October 28, 2011

ADMINISTRATIVE ORDER OF THE OIL CONSERVATION DIVISION

Under the provisions of 19.15.26.8B NMAC, Mesquite SWD, Inc. seeks an administrative order to re-enter and utilize its Cotton Draw Unit Well No. 66 (API 30-025-22024) located 2080 feet from the North line and 760 feet from the West line, Unit letter E of Section 10, Township 25 South, Range 32 East, NMPM, Lea County, New Mexico, for produced water disposal purposes.

THE DIVISION DIRECTOR FINDS THAT:

The application has been duly filed under the provisions of 19.15.26.8B NMAC and satisfactory information has been provided that affected parties as defined in said rule have been notified and no objections have been received within the prescribed waiting period. The applicant has presented satisfactory evidence that all requirements prescribed in 19.15.26.8 NMAC have been met and the operator is in compliance with 19.15.5.9 NMAC.

IT IS THEREFORE ORDERED THAT:

The applicant, Mesquite SWD, Inc., is hereby authorized to re-enter and utilize its Cotton Draw Unit Well No. 66 (API 30-025-22024) located 2080 feet from the North line and 760 feet from the West line, Unit letter E of Section 10, Township 25 South, Range 32 East, NMPM, Lea County, New Mexico, for disposal of oil field produced water (UIC Class II only) into the Bell Canyon and Cherry Canyon members of the Delaware Mountain Group through perforations from approximately 4980 to 6904 feet through lined tubing and a packer set less than 100 feet above the permitted disposal interval.

As preparation and prior to disposal, the operator shall verify whether the cement top is at or above 6904 feet by running a cement bond log or as specified by the Bureau of Land Management. If the cement top is below this depth, the well shall be squeeze cemented, ensuring the disposal interval is bounded by cement – conditions of squeeze determined by the BLM.



Within one year of commencing disposal, the operator shall run an injection survey to determine at which depths the disposal fluids enter the formation and those results supplied to the Division and placed into this permit file.

IT IS FURTHER ORDERED THAT:

The operator shall take all steps necessary to ensure that the disposed water enters only the proposed disposal interval and is not permitted to escape to other formations or onto the surface.

After installing tubing, the casing-tubing annulus shall be loaded with an inert fluid and equipped with a pressure gauge or an approved leak detection device in order to determine leakage in the casing, tubing, or packer. The casing shall be pressure tested from the surface to the packer setting depth to assure casing integrity.

The well shall pass an initial mechanical integrity test ("MIT") prior to initially commencing disposal and prior to resuming disposal each time the disposal packer is unseated. All MIT testing procedures and schedules shall follow the requirements in Division Rule 19.15.26.11A. NMAC.

The wellhead injection pressure on the well shall be limited to **no more than 996 psi**. In addition, the disposal well or system shall be equipped with a pressure limiting device in workable condition which shall, at all times, limit surface tubing pressure to the maximum allowable pressure for this well.

The Director of the Division may authorize an increase in tubing pressure upon a proper showing by the operator of said well that such higher pressure will not result in migration of the disposed fluid from the target formation. Such proper showing shall be demonstrated by sufficient evidence including but not limited to an acceptable Step-Rate-Test.

The operator shall notify the supervisor of the Division's district office of the date and time of the installation of disposal equipment and of any MIT test so that the same may be inspected and witnessed. The operator shall provide written notice of the date of commencement of disposal to the Division's district office. The operator shall submit monthly reports of the disposal operations on Division Form C-115, in accordance with Division Rules 19.15.26.13 and 19.15.7.24 NMAC.

Without limitation on the duties of the operator as provided in Division Rules 19.15.29 and 19.15.30 NMAC, or otherwise, the operator shall immediately notify the Division's district office of any failure of the tubing, casing or packer in the well, or of any leakage or release of water, oil or gas from around any produced or plugged and abandoned well in the area, and shall take such measures as may be timely and necessary to correct such failure or leakage.

The injection authority granted under this order is not transferable except upon division approval. The division may require the operator to demonstrate mechanical integrity of any injection well that will be transferred prior to approving transfer of authority to inject.

The division may revoke this injection permit after notice and hearing if the operator is in violation of 19.15.5.9 NMAC.

The disposal authority granted herein shall terminate two years after the effective date of this order if the operator has not commenced injection operations into the subject well. One year after the last date of reported disposal into this well, the Division shall consider the well abandoned, and the authority to dispose will terminate *ipso facto*. The Division, upon written request mailed by the operator prior to the termination date, may grant an extension thereof for good cause.

Compliance with this order does not relieve the operator of the obligation to comply with other applicable federal, state or local laws or rules, or to exercise due care for the protection of fresh water, public health and safety and the environment.

Jurisdiction is retained by the Division for the entry of such further orders as may be necessary for the prevention of waste and/or protection of correlative rights or upon failure of the operator to conduct operations (1) to protect fresh or protectable waters or (2) consistent with the requirements in this order, whereupon the Division may, after notice and hearing, terminate the disposal authority granted herein.


JAMH BAILEY
Director

JB/wvjj

cc: Oil Conservation Division – Hobbs
Bureau of Land Management - Carlsbad