



New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

John H. Bemis
Cabinet Secretary

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

Jami Bailey
Division Director
Oil Conservation Division



Administrative Order SWD-1318
February 10, 2012
Corrected March 5, 2012

ADMINISTRATIVE ORDER OF THE OIL CONSERVATION DIVISION

Under the provisions of 19.15.26.8B NMAC, Dugan Production Corp seeks an administrative order to utilize its St. Moritz SWD Well No. 2 (API 30-045-35281) located 2200 feet from the South line and 1780 feet from the East line, Unit letter J of Section 26, Township 24 North, Range 10 West, NMPM, San Juan 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, Dugan Production Corp, is hereby authorized to utilize its St. Moritz SWD Well No. 2 (API 30-045-35281) located 2200 feet from the South line and 1780 feet from the East line, Unit letter J of Section 26, Township 24 North, Range 10 West, NMPM, San Juan County, New Mexico, for disposal of oil field produced water (UIC Class II only) into the Entrada formation through perforations from **approximately 6860 to 7077** feet through lined tubing and a packer set less than 100 feet above the permitted disposal interval.

Prior to commencing disposal, the operator must either run open hole induction resistivity logs (or equivalent) or it must swab and recover a representative formation water sample from the overall perforated disposal interval, have the sample analyzed by a laboratory and that sample result supplied to the Division.

If the salinity of the insitu formation waters, as inferred by logging or determined by



swab testing, is less than 10,000 mg/l TDS, the operator shall initiate a hearing before Division examiners asking for a defined aquifer exemption area around this well.

The operator may commence disposal after showing insitu waters are greater than 10,000 mg/l of TDS or after obtaining an Aquifer Exemption through an Examiner hearing.

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 1372 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.


JAMI BAILEY
Director

JB/wvj

cc: Oil Conservation Division – Aztec
Bureau of Land Management – Farmington

Jones, William V., EMNRD

From: Kurt Fagrellius [kfagrellius@duganproduction.com]
Sent: Monday, March 05, 2012 2:27 PM
To: Jones, William V., EMNRD
Subject: Correction to Injection Interval

Hello Mr. Jones, as per our phone conversation concerning Administrative Order SWD-1318: 1) the top of the Entrada in the subject well is at 6851 and the base is at 7077' as stated in Part VIII. Geologic Data correctly.
2) the proposed interval to be perforated (6842-6070) as stated in Part III. Well Data is incorrect. The Entrada will be perforated from approximately 6860-7077. All perforations will be in zone (Entrada), however, I do not want to shoot the very uppermost part of the Entrada in order to avoid complications with the overlying Todilto Anhydrite. Please amend the approval for SWD-1318 to reflect the disposal of produced water (UIC Class II only) into the Entrada formation will be through perforations from 6860-~~6077~~.
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If you have any questions or require additional information, please contact me.

Sincerely,

Kurt Fagrellius
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