			d
3 DATE IN	MIOS SUSPEN	SE U JONEA 318,08 WFX PKURO80	1826256
	more the	ABOVE THIS LINE FOR DIVISION USE ONLY STATE NEW MEXICO OIL CONSERVATION DIVISION - Engineering Bureau - 1220 South St. Francis Drive, Santa Fe, NM 87505	K, C. K, C. K, C.
		ADMINISTRATIVE APPLICATION CHECKLIST	
		IANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND R WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE	EGULATIONS
Аррисо	[DHC-Dow [PC-Po	ndard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedicat nhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingl ool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement] [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion] [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase] lified Enhanced Oil Recovery Certification] [PPR-Positive Production Respon	ingj ¹
[1]	TYPE OF AI [A]	PPLICATION - Check Those Which Apply for [A] Location - Spacing Unit - Simultaneous Dedication NSL NSP SD	
	Checl [B]	Cone Only for [B] or [C] Commingling - Storage - Measurement DHC CTB PLC PC OLS OLM	, va as
	[C]	Injection - Disposal - Pressure Increase - Enhanced Oil Recovery	
		Other: Specify CONVERSION OF PRODUCTION WELL PITNJECTION	CE CE
[2]	NOTIFICAT [A]	ION REQUIRED TO: - Check Those Which Apply or Does Not Apply Working, Royalty or Overriding Royalty Interest Owners	PM
	[B]	Offset Operators, Leaseholders or Surface Owner	
	[C]	Application is One Which Requires Published Legal Notice	Q
	[D]	Notification and/or Concurrent Approval by BLM or SLO U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office	
	[E]	For all of the above, Proof of Notification or Publication is Attached, and/or	,
	[F]	Waivers are Attached	
[3]		CURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS TATION INDICATED ABOVE.	ГНЕ ТҮРЕ

 $\mathbf{E} \rightarrow$

[4] **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

Note	: Statement must be completed by an individua	I with managerial and/or su	pervisory capacity.	
JIM SKURNER	Allow	MANAGER	RESERVOIR ENGINEERING	3-2-08
Print or Type Name	Signature	Title	Date	
		C-mail Address	ER@enhancedoilres. Co	o <i>m</i>

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, New Mexico 87505

APPLICATION FOR AUTHORIZATION TO INJECT

I.	PURPOSE: X Secondary Recovery Pressure Maintenance Disposal Storage
	Application qualifies for administrative approval? X Yes No
II.	OPERATOR:EOR Operating Company
	ADDRESS:One Riverway Suite 610, Houston, TX 77056
	CONTACT PARTY: Jim Skurner, P.E. PHONE: (832) 485-8500 x505
III.	WELL DATA: Complete the data required on the reverse side of this form for each well proposed for injection. Additional sheets may be attached if necessary.
IV.	Is this an expansion of an existing project?YesXNo If yes, give the Division order number authorizing the project:No
V.	Attach a map that identifies all wells and leases within two miles of any proposed injection well with a one-half mile radius circle drawn around each proposed injection well. This circle identifies the well's area of review. – (See Attachment A)
VI.	Attach a tabulation of data on all wells of public record within the area of review which penetrate the proposed injection zone. Such data shall include a description of each well's type, construction, date drilled, location, depth, record of completion, and a schematic of any plugged well illustrating all plugging detail. (See Attachment B)
VII.	Attach data on the proposed operation, including:
	 Proposed average and maximum daily rate and volume of fluids to be injected; 375 MCFPD - 600 MCFPD CO2 100 BWPD - 300 BWPD
	 Whether the system is open or closed; - Closed (see Attachment D) Proposed average and maximum injection pressure; 1500 psi average (2000 psi max)
	 4. Sources and an appropriate analysis of injection fluid and compatibility with the receiving formation if other than reinjected produced water; and, 3rd party trucked liquid CO2 (guaranteed 99.9% pure) / produced water / produced gas (see Attachment C)
	 5. If injection is for disposal purposes into a zone not productive of oil or gas at or within one mile of the proposed well, attach a chemical analysis of the disposal zone formation water (may be measured or inferred from existing literature, studies, nearby wells, etc.) N/A
*VIII.	Attach appropriate geologic data on the injection zone including appropriate lithologic detail, geologic name, thickness, and depth. Give the geologic name, and depth to bottom of all underground sources of drinking water (aquifers containing waters with total dissolved solids concentrations of 10,000 mg/l or less) overlying the proposed injection zone as well as any such sources known to be immediately underlying the injection interval.
IX.	Describe the proposed stimulation program, if any. N/A
*X.	Attach appropriate logging and test data on the well. (If well logs have been filed with the Division, they need not be resubmitted).
*XI.	Attach a chemical analysis of fresh water from two or more fresh water wells (if available and producing) within one mile of any injection or disposal well showing location of wells and dates samples were taken.
XII.	Applicants for disposal wells must make an affirmative statement that they have examined available geologic and engineering data and find no evidence of open faults or any other hydrologic connection between the disposal zone and any underground sources of drinking water.
XIII.	Applicants must complete the "Proof of Notice" section on the reverse side of this form.
XIV.	Certification: I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.
	NAME:James A. Skutter,
	SIGNATURE: DU MULL DATE: 3-2-2018
	E-MAIL ADDRESS:jskurner@enhancedoilres.com

* If the information required under Sections VI, VIII, X, and XI above has been previously submitted, it need not be resubmitted. Please show the date and circumstances of the earlier submittal: ____Original permit to drill API# 30041002550000_____

III. WELL DATA

- A. The following well data must be submitted for each injection well covered by this application. The data must be both in tabular and schematic form and shall include:
 - (1) Lease name; Well No.; Location by Section, Township and Range; and footage location within the section.
 - (2) Each casing string used with its size, setting depth, sacks of cement used, hole size, top of cement, and how such top was determined.
 - (3) A description of the tubing to be used including its size, lining material, and setting depth.

(4) The name, model, and setting depth of the packer used or a description of any other seal system or assembly used.

Division District Offices have supplies of Well Data Sheets which may be used or which may be used as models for this purpose. Applicants for several identical wells may submit a "typical data sheet" rather than submitting the data for each well.

- B. The following must be submitted for each injection well covered by this application. All items must be addressed for the initial well. Responses for additional wells need be shown only when different. Information shown on schematics need not be repeated.
 - (1) The name of the injection formation and, if applicable, the field or pool name.
 - (2) The injection interval and whether it is perforated or open-hole.
 - (3) State if the well was drilled for injection or, if not, the original purpose of the well.
 - (4) Give the depths of any other perforated intervals and detail on the sacks of cement or bridge plugs used to seal off such perforations.
 - (5) Give the depth to and the name of the next higher and next lower oil or gas zone in the area of the well, if any.

XIV. PROOF OF NOTICE

All applicants must furnish proof that a copy of the application has been furnished, by certified or registered mail, to the owner of the surface of the land on which the well is to be located and to each leasehold operator within one-half mile of the well location.

Where an application is subject to administrative approval, a proof of publication must be submitted. Such proof shall consist of a copy of the legal advertisement which was published in the county in which the well is located. The contents of such advertisement must include:

- (1) The name, address, phone number, and contact party for the applicant;
- (2) The intended purpose of the injection well; with the exact location of single wells or the Section, Township, and Range location of multiple wells;
- (3) The formation name and depth with expected maximum injection rates and pressures; and,

(4) A notation that interested parties must file objections or requests for hearing with the Oil Conservation Division, 1220 South St. Francis Dr., Santa Fe, New Mexico 87505, within 15 days.

NO ACTION WILL BE TAKEN ON THE APPLICATION UNTIL PROPER PROOF OF NOTICE HAS BEEN SUBMITTED.

NOTICE: Surface owners or offset operators must file any objections or requests for hearing of administrative applications within 15 days from the date this application was mailed to them.

EOR Operating Company, Milnesand Unit, Injection Wells, Roosevelt County	pany, M	lilne	sand	l Un	it, II	njecti	on Well;	э, Ro	sevel	It Co	unty		0			
API WELL #	Well #	±	Type St	Stat S	s S	UL Sec	Twp	S/N	Rng W/E	V/E	Feet NS	ť	N E N	Last Insp	Order_No	Pressure Limit
30-041-10149-00-00	026	_	F	<u> </u>	<u> </u>	19		8 S	35 E		660 S	660 E	 	8/14/2007 R-3770	R-3770	None
30-041-00087-00-00	036	_	<u>ح</u>	ш	z	1 18		8 S	35 E		660 S	1980 W	N	6/14/2007 R-3770	R-3770	None
30-041-00251-00-00	054	_	<u>ح</u>	ш	T	13		8 S	34 E		2050 N	660 E	<u></u> п	8/14/2007 R-3770	R-3770	None
30-041-00253-00-00	056	_	4	ш	<u>u</u> _	13		8 S	34 E		1980 N	1980 W	N	6/14/2007 R-3770	R-3770	None
30-041-00029-00-00	122	_	4		z		7 8	8 S	35 E		660 S	1980 W	2	8/14/2007 R-3770	R-3770	None
30-041-10017-00-00	127	_	4		<u>u</u>		7 8	8 S	35 E		1975 N	1901 W	~	8/14/2007 R-3770	R-3770	None
30-041-00243-00-00	162	_	4	٩.		12		8 S	34 E		660 S	660 E	U1	6/14/2007 R-3770	R-3770	None
30-041-00136-00-00	183	_	<	٩.	<u>u</u> .	18		8 S	35 E		1980 N	1980 W	N	9/26/2007 R-3770	R-3770	None
30-041-00137-00-00	195	_	∢	۵.		13		8 S	34 E		660 S	660 E	П	8/14/2007 R-3770	R-3770	None
30-041-10059-00-00	310	_	4	ш	Ш.,	19		8 S	35 E		1980 N	1909 W	3	8/14/2007 R-3770	R-3770	None
30-041-10195-00-00	317	_	4	<u>u</u>	I	19		8 S S	35 E		2310 N	990 E	<u></u> и	8/14/2007 R-3770	R-3770	None
30-041-10158-00-00	517	_	ш	<u>LĽ</u>		24		8 S	34 E		660 S	660 E		8/14/2007 R-3770	R-3770	None
30-041-00141-00-00	031	_	4	<u> </u>		18		8 S	35 E		1986 S	660 W	>	8/14/2007	8/14/2007 WFX-440	None
30-041-00143-00-00	033	_	۲	<u>Ľ</u>	-	18		8 8	35 E		1981 S	1980 E	<u></u>	6/14/2007	6/14/2007 WFX-440	None
30-041-00142-00-00	035	_	۲	ш		19		8 S	35 E		660 N	660 W	>	8/14/2007	8/14/2007 WFX-440	None
30-041-00131-00-00	182		4	۵.		18		8 S	35 E		660 N	660 W	×	8/14/2007	8/14/2007 WFX-440	None
30-041-00138-00-00	192	-	<	٩.	~	13		8 S 8	34 E	 	1980 S	1980 E	μ	8/14/2007	8/14/2007 WFX-440	None
30-041-10057-00-00	187		∢	٩	<u>m</u>		18	8 S	35 E		660 N	1980 E	μ	11/1/2007	11/1/2007 WFX-464	None
30-041-00256-00-00	059	-	4	LL_	Ω.		13 8	8 S	34 E	 	660 N	1980 E	ш	8/14/2007	8/14/2007 WFX-519	916
30-041-10147-00-00	024	_	<	<u> </u>	<u> </u>	19		8 S	35 E		1980 S	1980 E	ш.	8/14/2007	8/14/2007 WFX-574	931
30-041-10060-00-00	311	–	4	뜨	<u>m</u>	19		8 S	35 E		660 N	1980 E	<u> </u>	8/14/2007	8/14/2007 WFX-574	930
30-041-00261-00-00	514	0	ш	<u> </u>	~	24		8 S S	34 E		1980 S	1980 E	<u> </u>	8/14/2007	8/14/2007 WFX-574	913
30-041-00255-00-00	058	0	4	<u>ц</u>	<		13 8	8 8	34 E	,	660 N	660 E	ш	8/14/2007 WFX-83	WFX-83	72.000/CO2

H3 Ъ3 ĥ3 Method Determined: _returns 75sx_ RANGE 34E Method Determined: _calculated_ 4 1/2" 9.5# 8 5/8" WELL CONSTRUCTION DATA Method Determined: ; indicate which) 4646 TOWNSHIP Casing Size: Casing Size: Casing Size: Intermediate Casing - n/a SS SS **Production Casing** Injection Interval Surface Casing or or 0 feet to SX. SX. SX. SECTION (Perforated or 13 4696' surface 250 12 3/4" 3950' 150 7 7/8" **INJECTION WELL DATA SHEET** 4536 Cemented with: Top of Cement: Cemented with: Top of Cement: Cemented with: Top of Cement: Total Depth: UNIT LETTER Hole Size: Hole Size: Hole Size: Junk to TO 🔮 4696, LD Fish r, Circulate Clean EOR Operating Company. Casing Repar JUG7 Lear Found (152-1653 Set 22 Day (2) - 152-1653 Setemana 200 et. Rur Out 12 et Dited 22 Dill and 417 Cement w/ 3/8° BH Casing Tes Successful 12/1/2007 Junk in Hole @ 4365' Tubing, Rock, and Pump Pushed to Botton Perforations 4558-61, 82-85, 80-64 4568-4600 4504-600 Milnesand Unit 58 Assembly - Propo PC Tubing to 4000 cints 2-3/8" Talipipe florations 4 SPF 4538-48 FOOTAGE LOCATION 660 FNL & 660 FEL Milnesand Unit Well #58 - Recompletion WELLBORE SCHEMATIC +++-+++-√ X X WELL NAME & NUMBER: Π 8-5/8= 244 @ 366' Cemented w/ 150 sx Circutated 75 sx to Surface WELL LOCATION: __ Formation Tops Rustler 2147 Vales 2628 Queen 3322 San Andres 3811 4-1/2" 9.54 @ 4896' Centented w/ 250 sx Celoutated TOC 3950' 660 FNL, 660 FEL Unit Letter A Section 13, Township 85, Range 34E Drilled and Completed March 1962 **OPERATOR:** Side 1

INJECTION WELL DATA SHEET Tubing Size: 2 3/8" Lining Material: Corvell IPC Type or Packer: Halliburton G:4 4 ½", 9.5# - 13.5#, 2 3/8" API-EU, B-P Corvell IPC Packer Setting Depth: 4000 T + 426 riv n/a	
Rustler 2147'	
Yates 2628'	
Queen 3322'	
	Lining Material: Lining Material: 3.5#, 2 3/8" API-EU, B-P 3.5#, 2 3/8" API-EU, B-P a.n/a n/a n/a n/a n/a Na n/a n/a n/a n/a n/a n/a n/a n/

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Attachment C





22C World's Fair Drive, Somerset, NJ 08873 Tel E-Mail: airbornelabs@aol.com

Tel: 732-302-1950 Fax: 732-302-3035 Website: www. airbornelabs.com

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Carbon Dioxide (CO₂) Analysis ISBT Beverage-Grade Program[®]

Reliant Processing 3700 Kermit Highway Odessa, TX 79764 Phone: Tel: 806-925-6654 (Fax: 806-925-6659) Attn.: Mr. Chris Kennemer, Mr. Joshua Jones, and Mr. Heath Babcock E-Mail: <u>chrisk@flococo2.com</u> , <u>dherrera@floco2.com</u> , <u>joshuaj@floco2.com</u> , <u>heath@floco2.com</u>	ALI Track No.: Received On: Report Date: Payment Mode:	12/08/07 01/04/08
Sample ID. : Liquid CO ₂ , 'Muleshoe Plant M12230751" Sample ID. : Received in a 1L passivated ALI cylinder #1L-Sulf-D-08	Sampled On: Process Stage:	12/23/07 Final
Test Description/Units	<u>Result</u>	<u>M.D.L.</u>
CO2 Purity (% v/v, ISBT 2.0 [GC/DID]):	99.99+	99.00
Water Vapor (H ₂ O, ppm v/v, ISBT 3.0 [CH]):	nd	1
Oxygen (O ₂ , ppm v/v, ISBT 4.0 [GC/DID]): Comments: H ₇ = nd I ppm, Ar = nd I ppm v/v	3.6	1
Nitrogen (N ₂ , ppm v/v, ISBT 4.0 [GC/DID]):	38	1
Carbon Monoxide (CO, ppm v/v, ISBT 5.0 [GC/DID]):	nd	1 0.5
	nd	
	nd	0.5
Nitric Oxide (NO, ppm v/v, ISBT 7.1 [DT]):	nd nd	0.5 0.5
Non-Volatile Residue (NVR, ppm w/w, ISBT 8.0 [Grav]):	nd	2
Comments: Non-Volatile Organic Residue (NVOR, ppm w/w, ISBT 8.0 [Grav]):	nd	2
Comments: Phosphine (PH ₃ , ppm v/v, ISBT 9.0 [DT]):	nd	0.25
Total Hydrocarbons (THC, ppm v/v as Methane, ISBT 10.0):		
Vapor Phase:	0.7	0.1
Liquid Phase:	0.5	0.1
Total Non-Methane Hydrocarbons (TNMHC, ppm v/v as Methane, ISBT 10.1):	0.1	0.1
Methane (CH4, ppm v/v, ISBT 10.1 [GC]):	0.4	0.1
Acetaldehyde (AA, ppm v/v, ISBT 11.0 [GC]):	nd	0.05
Total Other Volatile Oxygenates (TOVO, ppm v/v, ISBT 11.0 [GC]);	nd	0.1
Comments: Obtained by summation of all speciated VOX target impurities Jess AA, McOH & EtOH. Aromatic Hydrocarbon Content (ppb v/v as Benzenc, ISBT 12.0 [GC]): Comments: No Target AHC's detected.	nd	2
Total Sulfur Content* (TSC* ppm v/v as S, ISBT 14.0): Comments: Obtained by summation of all speciated VSC target impurities less SO ₂	nd	0.01
Sulfur Dioxide (SO ₂ , ppm v/v, ISBT 14.0 [GC]):	ba	0.05
Sensory Tests		
Odor of Snow (Pass/Fail, ISBT 15.0):	**	08
Appearance in Water (Pass/Fail, ISBT 16.0):	pass	na
Comments: ** Odor of snow test requires a 20 lb. tank sample	pass	ná
Supplemental Tests		
Hydrogen Cyanide (HCN, ppm v/v by ISBT SM-1.0, [GC]):	nd	0.2
Vinyl Chloride (ppm v/v by ISBT SM-2.0 [GC]):	nđ	0.1
Ethylene Oxide (ETO, ppm v/v by ISBT 11.0 [GC]):	nd	0.1

Sample ID: Reliant Processing

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ALI Track No.: 5184

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<u>Speciated Volatile Hydrocarbons (VHC, ppm v/v by ISBT 10.1)</u>	Result	<u>M.D.L.</u>
Ethane:	trace	0.1
Ethylene:	nd	0.1
Propane:	trace	Ô.1
Propylene:	nd	0.1
Isobutane:	nd	0.1
n-Butane:	nd	0.1
Butene:	nd	0.1
Isopentane:	nd	0.1
n-Pentane:	nd	0,1
Hexanes +:		0.1
Comments: Peak ID based upon tr match against target analyte standards. Note: Methane results reported on pg		MARY
Speciated Volatile Sulfur Compounds (VSC, ppm v/v by ISBT 14.0)	<u>Result</u>	<u>M.D.L.</u>
Hydrogen Sulfide (H ₂ S):		0.01
Carbonyl Sulfide (COS):		0.01
Methyl Mercaptan:	nd	0.01
Ethyl Mercaptan:	nd	0.01
Dimethyl Sulfide:	nd	0.01
Carbon Disulfide:	nd	0.01
t-Butyl Mercaptan:	nd	0.01
Isopropyl Mercaptan:	nd	0.01
n-Propyl Mercaptan:	nd	0.01
Methyl Ethyl Sulfide:	nd	0:01
2-Butyl Mercaptan:	- nd	0.01
Diethyl Sulfide:	nd nd	0.01 0.01
n-Butyl Mercaptan:	_	0.01
Dimethyl Disulfide:	nd	0.01
Unknown VSC:	nd	0.01
Comments: Peak ID based upon t- match against target analyte standards. Note: SO ₂ + TSC* results reported on		
Speciated Volatile Oxygenates (VOX, ppm v/v, by ISBT 11.0)		
Dimethyl Ether:	nd	0.1
Diethyl Ether:	nd	0.1
Propanal:	nd	0.1
Acetone:	nd	0.1
Methanol:	nd	0.1
t-Butanol:	nd	0.1
Ethanol:	nd	0.1
Isopropanol:	nd	0.1
Ethyl Acetate:	щ	0.1
Methyl Ethyl Ketone:	<u>nd</u>	0.1
2-Butanol:	ne	0.1
n-Propanol:	ńd	0.1
Isobutanol:	na	0.1
n-Butanol:	mu.	0.1
Unknown VOX:	110	0.1
Comments: Peak ID based upon i. match against target analyte standards. Acetaldehyde & Ethylene Oxide result		0.1

Comments: Peak ID based upon in match against target analyte standards. Acetaldehyde & Ethylene Oxide results reported on pg. 1.

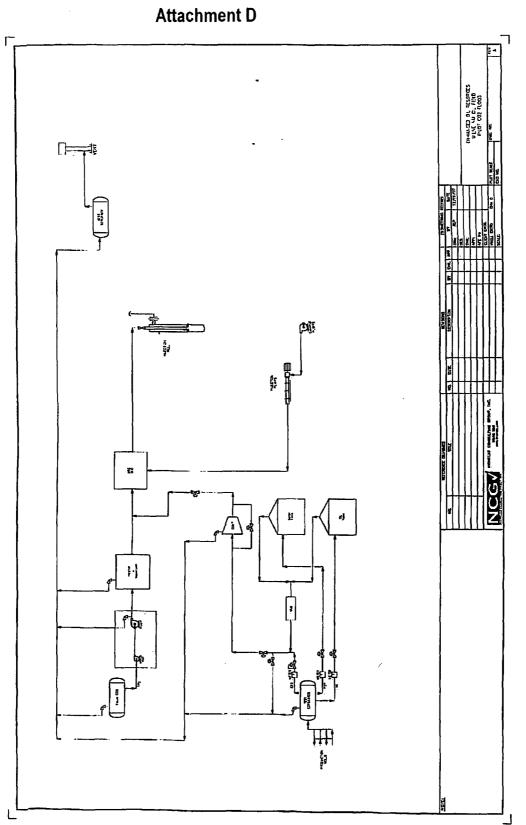
M.D.L. = report detection limit (for quantitation), tr = Trace amount less than the report detection limit was observed, ad = indicates the impurity was not detectable and below the report detection limit. == i test not performed, na = not available. L.T. = test than the amount specified. G.T. = greater than the amount specified. % = percent. ppm = parts per million. ppb = parts per million. v/r = volume analyte/volume sample. w/w = weight analyte/weight sample. (result) indicates the result was obtained by the method listed within brackets. TSC* = ISBT total sulfur content excluding SO₂. Unit Conversions: 1 ppm v/r = 1µL/L = 1,000 ppb = 0.0001% v/v.

Report Summary: Customer request for full ISBT LCO2 test program. This sample meets ISBT purity guidelines for beveragegrade LCO₂.

Reviewed By,

<u>Joseph Angeloni</u>

Joseph Angeloni-Laboratory Director.



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Enhanced Oil Suurces

C104AReport

JUT UNCOON

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Page 1 of 1

Form C-145

Permit 70145

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505

Change of Operator

Provious Open	ator Information	New Operator	le formation	
		Effective Date:	1/1/2008	
OGRID:	11182	OGRID:	257420	-
Name:	J CLEO THOMPSON	Name:	EOR OFERATING COMPANY	
Address;	325 N ST PAUL STE 4300	Address:	One Riverway, Suite 610	_
Address:		Address:		
City, State, Zip:	DALLAS, TX 75201	City, State, Zip:	Houston , TX 77056	-

I hereby certify that the rules of the Oil Conservation Division have been complied with and that the information on this form and the certified list of wells is true to the best of my knowledge and balief.

Previous Operator	New Operator
Signature: 1971/ A Treeman Printed Name: VONda FReeman	Signature: Printed Name: N. Kyle Willis
Tile Agent	Title: VICE PRESIDENT
Date: 2/22/08 Phone 432) 550-8887	Date: 2/22/2008 Phone: 832.4858502-

NMOCD Approv	<u>al</u>		
Electronic Signature:	Chris	Williams,	District 1
Date: February 22, 20	<u>008</u>		

http://www.cmnrd.state.run.us/OCD/OCDPermitting/Report/C104A/C104AReport_aspx?P... 2/22/2008

Submit 3 Copies To Appropriate District	Form C-103
Office Office A Provide and Natural Resources	May 27, 2004
District I 1625 N. French Dr., Hobbs, NAUS249 District II	WELL API NO. 30-041-00255
District III ADD 0.7 2008 1220 South St. Formula Dr.	5. Indicate Type of Lease
I301 W Grand Ave., Artesia, NM 88210 OIL CONSERVATION DIVISION District III APR 0 7 2008 1220 South St. Francis Dr. 1000 Rio Brazos Rd., Aztec, NM 87410 District IV	STATE FEE X
District IV 1220 S. St. Francis Dr., Sart ANBBS OCATA 87505	6. State Oil & Gas Lease No. 257420
SUNDRY NOTICES AND REPORTS ON WELLS	7. Lease Name or Unit Agreement Name
(DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH PROPOSALS.)	MILNESAND UNIT
1. Type of Well: Oil Well Gas Well Other INJECTION	MSU # 58
2. Name of Operator EOR OPERATING COMPANY	9. OGRID Number 257420
3. Address of Operator	10. Pool name or Wildcat
ONE RIVERWAY, SUITE 610, HOUSTON, TX 77056	MILNESAND (SAN ANDRES)
4. Well Location Unit Letter A : 660 feet from the NORTH line and	660 feet from the EAST line
	660 feet from the EAST line ' NMPM County ROOSEVELT
11. Elevation (Show whether DR, RKB, RT, GR, etc.)	
4254' GL	
Pit or Below-grade Tank Application or Closure Pit type Depth to Groundwater Distance from nearest fresh water well	and from monost our food water
	nstruction Material
12. Check Appropriate Box to Indicate Nature of Notice,	
	-
	SEQUENT REPORT OF:
PERFORM REMEDIAL WORK PLUG AND ABANDON REMEDIAL WORK	— — —
	_
OTHER: ADD PERFS, STIMULATE INJECTION WELL X OTHER: 13. Describe proposed or completed operations. (Clearly state all pertinent details, and	give pertinent dates including estimated date
of starting any proposed work). SEE RULE 1103. For Multiple Completions: Att or recompletion.	ach wellbore diagram of proposed completion
START DATE: 4/10/08	
1.) RU, POOH W/TBG & EXISTING PKR. RIH W/ BIT & SCRAPER TO BOTTON	& CLEAN OUT FILL
2.) RIH W/PKR & PLUG, TEST CSG. IF CSG NEEDS REPAIR. LOCATE HOLE &	
 3.) ADD PERFORATION 4536'-4646' 4JSPF. 4.) STIMULATE PERFORATIONS W/ 12,000 GALS OF 15% HCL ACID. 	
5.) RIH W/ NEW 2 3/8" IPC TBG & NEW 4 1/2" HES G6 PKR. SET PKR @ APPR(OXIMATELY 4000'.
6.) CIRCULATE PACKER FLUID. SET PKR & TEST ANNULUS TO 500 DSI	· · -
7.) NIPPLE UP WELL HEAD. RD, MOVE OFF PULLING. "CON 8.) (4 ½",9.5# CGS @ 4696',PERFS 4536'-4646') for Dril	DITION FOR APPROVAL" Approval ling only. CANNOT Inject into the wellbore
withou	t an Injection order approved by
the Sa	nta Fe OCD Office
I hereby certify that the information above is true and complete to the best of my knowledge	and belief. I further certify that any sit on below
grade tank has been/will be constructed or closed according to NMOCD guidelines \vec{X} , a general permit \Box of	or an (attached) alternative OCD-approved plan [].
SIGNATURE	upervisorDATE4/4/08
Type or print name: Lawrence A. Spittler, Jr. E-mail address: lspittler@enhancedoilres For State Use Only	
APPROVED BY: here Williams OC DISTRICT SUPERVISOR/GENER	APR 16 2008
APPROVED BY: <u>Mus Williams</u> Conditions of Approval (if any):	ALMANAGER DATE

,

.

FREEDOM NEWSPAPERS OF NEW MEXICO PORTALES NEWS-TRIBUNE P.O. BOX 848 PORTALES, NM 88130 (505) 356-4481 March 12, 2008



ENHANCED OIL RESOURCES, INC. ONE RIVERWAY, SUITE 610 HOUSTON, TX 77056

ACCT NO	861017

LEGAL # 6734 PO

LEGAL NOTICE

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DATES RUN:	# OF LINES	RATE	CHARGE
March 12, 2008	33	1.100	36.30
	0	1.100	0.00
	0	1.100	0.00
	0	1.100	0.00
	0	1.100	0.00
	0	1.100	0.00
	0	1.100	0.00
AFFIDAVIT FEE	1	21.00	21.00
TEAR SHEET FEE	0	1.00	0.00
SALES TAX	-		4.26
TOTAL		TOTAL	61.56

ADVERTISING DUE AND PAYABLE 15 DAYS AFTER BILLING DATE. A 1 1/2% FINANCE CHARGE WILL BE ADDED ON ALL BALANCES OVER 30 DAYS.

AFFIDAVIT OF LEGAL PUBLICATION

LEGAL # 6734

STATE OF NEW MEXICO COUNTY OF CURRY:

Terri Ann Gutierrez, being duly sworn, says: That she is the Legal Clerk of The Portales New-Tribune, a daily Newspaper of general circulation, published in English at Clovis, said county and state, and that the hereto attached

LEGAL NOTICE

was published in said Portales New-Tribune, a daily newspaper duly qualified for that purpose within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico for 1 consecutive days/weeks on the same days as follows:

First Publication: Second Publication: Third Publication: Fourth Publication: March 12, 2008

Subscribed and sworn to before me March 12, 2008

Notary Public

My Commission Expires: NOVEMBER 7, 2009



OFFICIAL SEAL CINDY L. COLE NOTARY PUBLIC - STATE OF NEW MEXICO My commession expires

Legal 6734 March 12, 2008
EOR Operating Company 200 N: Loraine
Sulte 1440 Midland TX 79701
(Contact Jim Skurner (832) 485-8500)
Permit Application (CO2/Water Injection Well
Milnesand Unit #58, 660" FNL & 660 FEL, T8S-
R34E-S13 Roosevelt County San Andres Formation, 4536-4646-ft
600: MCFD/300, BWPD, maximum injection rate, 2000: psi/maximum injec-
tion pressure:
Interested parties must, file objections or requests
for hearing within 15 days to, the OI Conservation Division, 1220 South St.
Francis Dr. Santa Fe. New/Mexico 87505

First-Class Mail UNITED STATES POSTAL SERVICE Postage & Fees Paid GAND NA USPS Permit No. G-10 • Sender: Please print your name, address, and ZIP+4, Enhanced and Resources Jim Skumer One Riverway ste. 4 TO USPS Honston, TK 770526 in this box C027 COMPLETE THIS SECTION ON DELIV SENDER: COMPLETE THIS SECTION Complete items 1, 2, and 3. Also complete Α. Signature C Agent item 4 if Restricted Delivery is desired. IMAN □ Addressee Print your name and address on the reverse so that we can return the card to you. B. Received by (Printed Name) C. Date of Delivery Attach this card to the back of the mailpiece, or on the front if space permits. 🖸 Yes D. Is delivery address different from item 1? 1. Article Addressed to: If YES, enter delivery address below: brie Luman P.O. BOX 100 milnesand, NM 88125 Septice Type Express Mail DRegistered Return Receipt for Merchandise Insured Mail C.O.D. 4. Restricted Delivery? (Extra Fee) C Yes 2. Article Number 7006 0810 0002 5883 0307 (Transfer from service label) PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

Attachment A

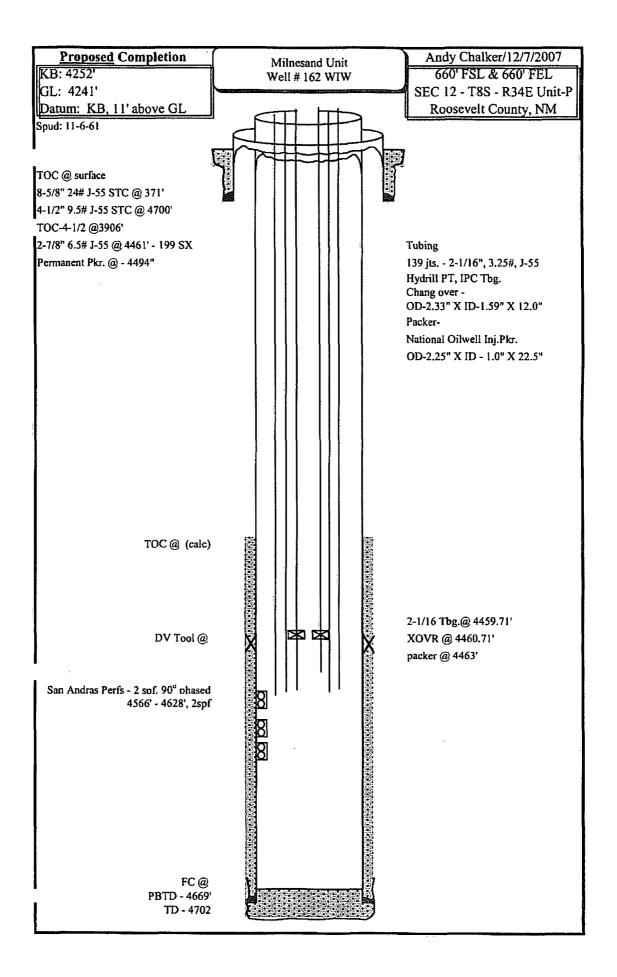
Area Map

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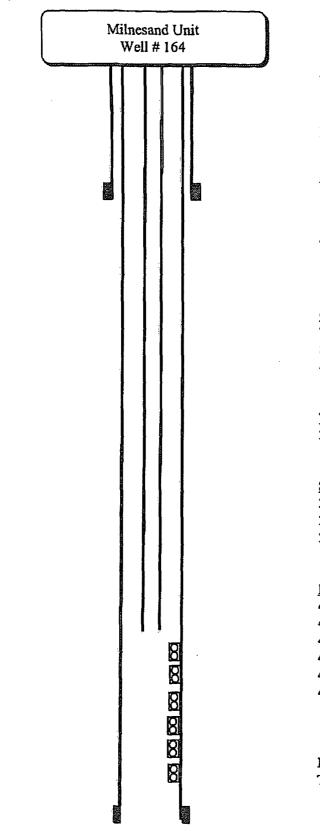
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H MEIT		MILNESAND UNIT	LIN	102:	30041002430000	Injector	4700		4533	4628	ACTIVE	33.63018	-103,41072	11/26/1962	
PI WELL	1	MILNESAND UNIT	Init	184	30041002450000	Producer	4700		4578	4638	INACTIVE - TA	33.63381	-103,41073	12/17/1982	
PI WELL		MILNESAND UNIT	INI	×.	30041002510000	Injector	4663		4652	4630	ACTIVE	33.62273	-103,41062	12/8/1981	
PI WELL		MILNESAND UNIT	LINI	33	3004100252001	Producer	4697		4555	4625	ACTIVE	33.82284	-103,41496	12/5/1962	
PI WELL		MILNESAND UNIT	FINE	86	30041002560000	Injector	4697		4580	4623	ACTIVE	33.82657	-103.41502	4/11/1962	
PI WELL		MILNESAND UNIT	TNT TNT	510	30041002580000	Producer	4666		4577	4620	DIACTIVE - TA	33.62659	-103,41637	1/23/1962	
PI WELL		MILNESAND UNIT	LIN	. 89:	30041002650000	Producer	4700		4559	4630	ACTIVE	33.02055	-103.41068	3/31/1962	
PI WELL		MILNESAND UNIT	LLIN.	121	3004100026000	Producer	4670		4502	4638	INACTINE - TA	31053.55	-103.40638	6/18/1962	
PI WELL		MILNESAND UNIT	INIT	101	30041000830000	Producer	4695		4524	4830	INACTIVE - TA	33.01834	-103,41057	8/20/1961	
DI WELL		MILNESAND UNIT	LIN	182	30041001310001	Injector	0100	1769	4543	4612	ACTIVE	33.62655	-103.40834	ev10/1962	
PI WELL		MILNESAND UNIT	ULT NIT	181	30041000860000	Producer	4718		4528	4854	INACTIVE - PA	33.62292	-103,40829	1901/12/12	7/1/2001
		MILNESAND UNIT	LIN	223	30041208470000	Producer	4750		4929	4625	ACTIVE	33,62813	-103,413	7/1/1982	
PI WELL		MILNESAND UNIT	LIN.	523	30041208480000	Producer	4715		4544	4619	ACTINE	33.62811	-103.40863	7/2//1982	
PI WELL		MILNESAND UNIT	LIN	524	30041206490000	Producer	4750		4553	4826	INAGTIVE-TA	33.62462	-103,40878	7/8/1982	
		MILNESAND UNIT	LIN.	525:	30041206500000	Producer	4750		4548	4822	INACTINE - TA	33.62491	103.41276	7128/1982	
PI WELL		MILNESAND UNIT	LUL IN	185	30041100580000	Producer	4683		(673	4622	INACTIVE - TA	33,62656	103.40228	S/8/1963	
PI WELL		TINU CUASAND UNIT	LIN	161	30041007420000	Producer	1771		AMK.	(LAN)	INACTIVE - PA	33,63024	-113,41500	10/18/1982	4/1/1890

Attachment B

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Location 1980' FSL & 660' FNL SEC 12 - T8S - R34E Roosevelt County, NM Date: 12/1/1962

Elevation KB: 4255 ft

TA'd CIBP@4495' 6/73

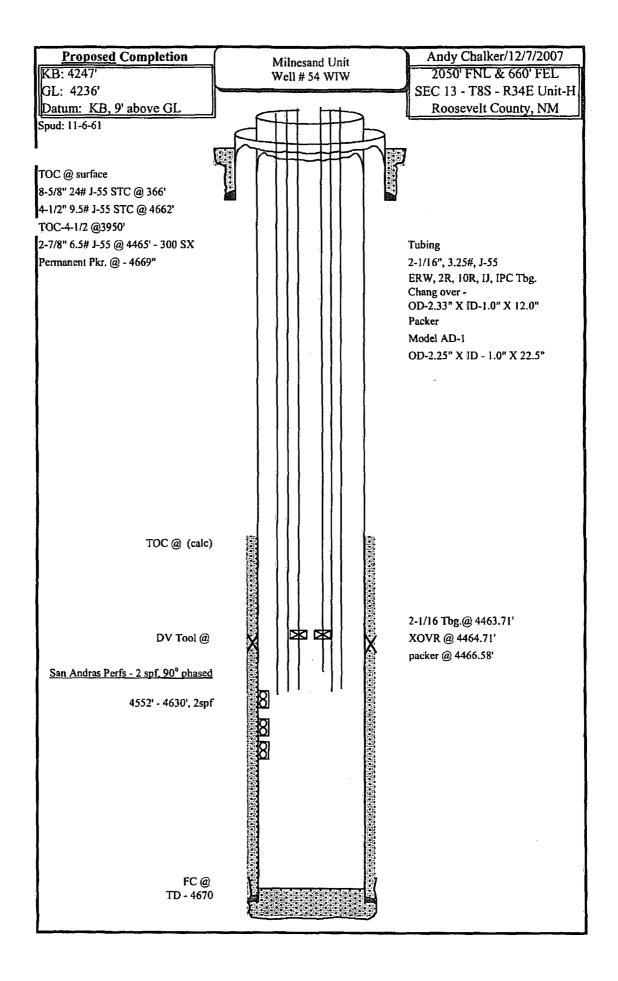
Casing Detail TOC @ surface 8 5/8",24#@ 353' 225sks 4-1/2",9.5#,@4700' 225sks

<u>Tubing</u> 2" tbg @4602'

Stimulation 2000 gals acid 20000 gals refined oil 20000# sand

Perforation Data 4576-4578' 4594-4596' 4602-4605' 4612-4613' 4620-4624' 4632-4636'

PBTD:	4670 ft
TD:	4700 ft



lnesand U Well # 55	
X V poorooge	

Location 1980' FNL & 1980' FEL SEC 13 - T8S - R34E Roosevelt County, NM Date: 2/7/1962

Elevation KB: 4253 ft

Casing Detail TOC @ surface 8 5/8",24#@ 372' 225sks 4-1/2",9.5#,@4697' 200 sks

<u>Tubing</u> 2-1/16", 3.25# @4554' <u>Packer-</u> Baker "K" Model @4626'

Perforation Data

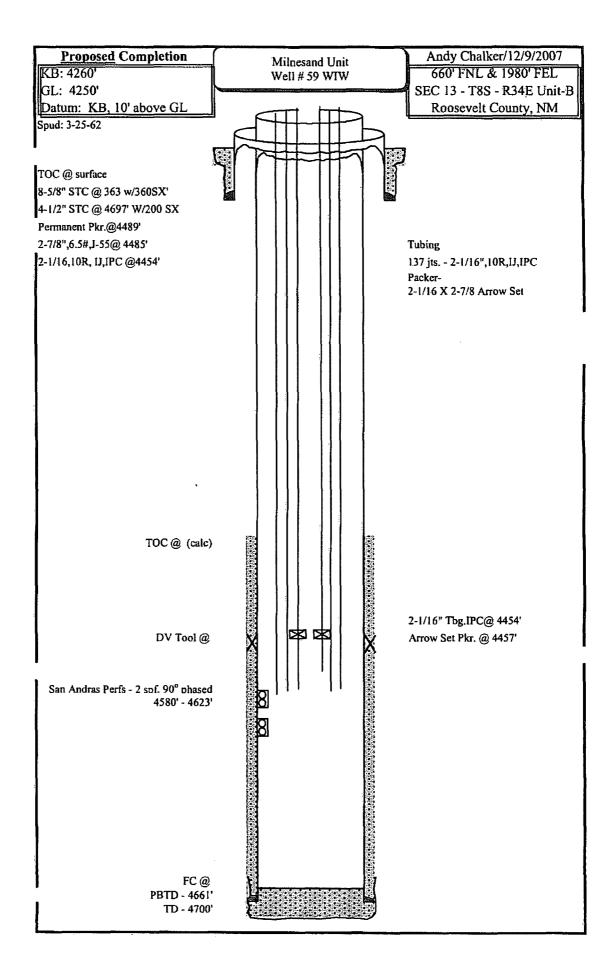
4555-4625' 4626-4654' - squeezed off

<u>Stimulation</u> 2000 gals acid 20000 gals refined oil 20000# sand

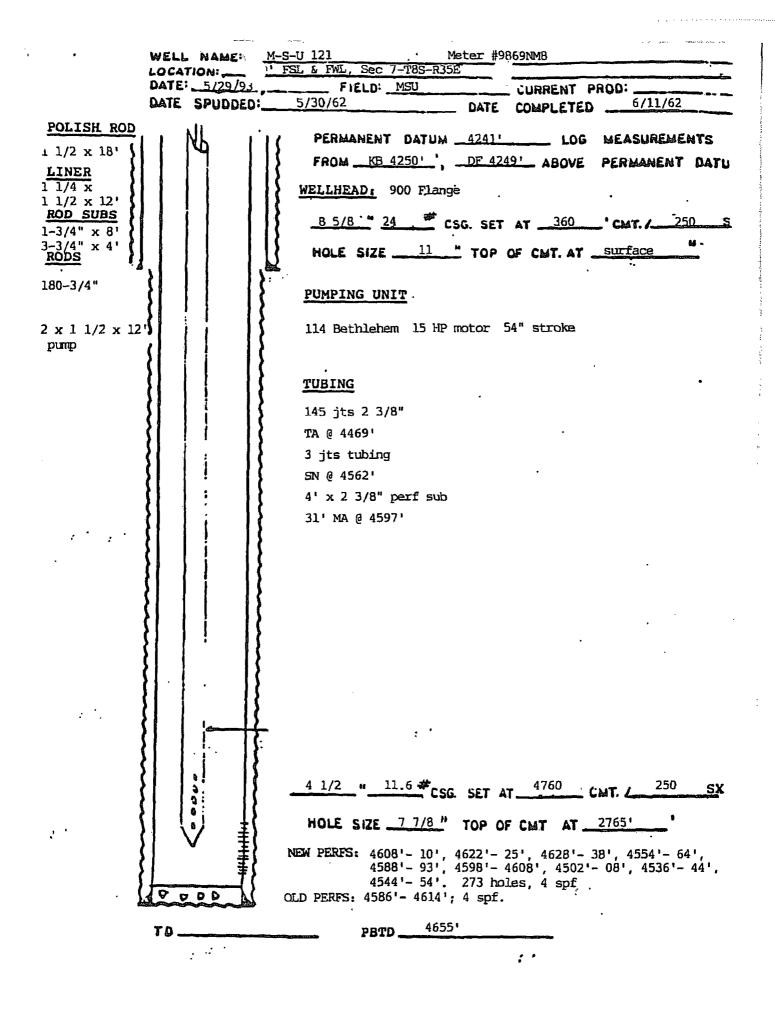
PBTD:	4626 ft
TD:	4648 ft

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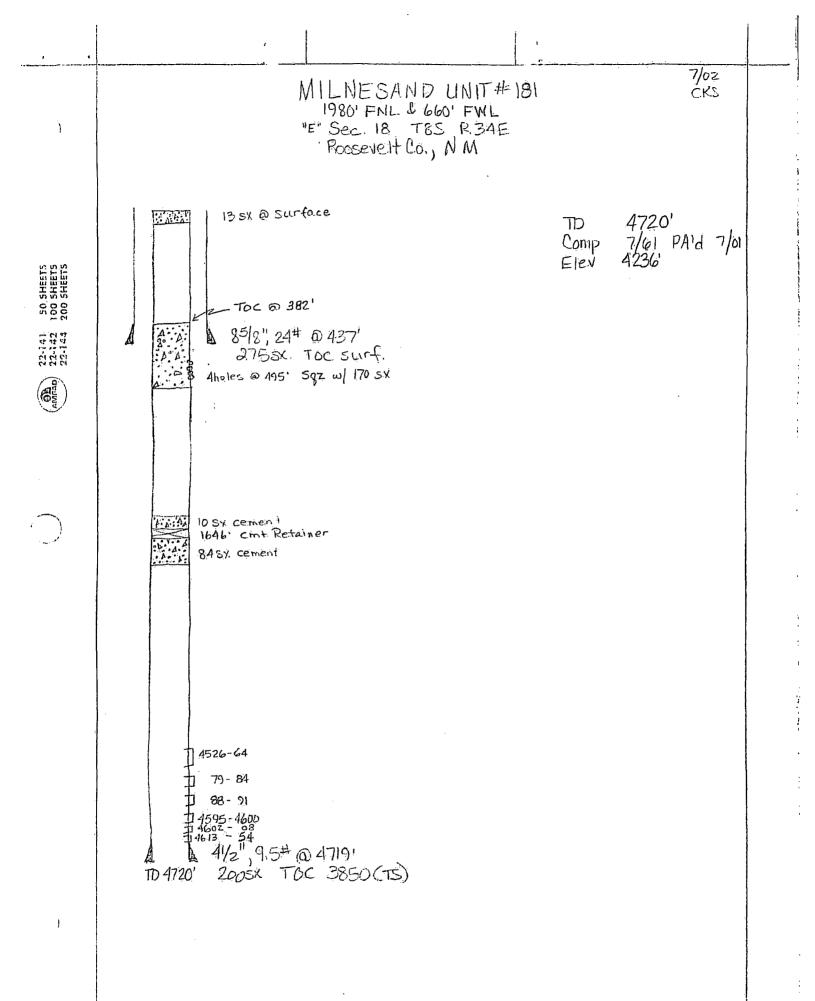


UNINN TEXAS PETROLFUM FIELD: Milnesand LEASE: Milnes and Idnit WELL NO. 5-10 DATE: 9/24/80 SPUDDED: 4-6-62 COMP 4-23-62 LOCATION: 660 ENL & 1980 EWL I-8-5, R-74-E, Roase County; 34-E. Roasene New Mexico Joga, GR/N Inside (55. <u>24</u> # 85/8" CSG. 01 371 W1 250 SX. R. 29, 29, Colla 12/2 " HOLE TOC <u>Cin. to Surf.</u> -23/8" EVE 4.7# J-55 8rd. - Baker Tubring Anchor @ 4542 Porf. 4597-80, 4583-87, 4591-93, 4602-05, 4614-20 W/ 2 JSPF A/2000 gal. 15% & F/20,000 gal 0 + 20,000# IPF 325 BOPD No WAR. GOR 4610 4607-11 MAE +4+2 <u>9.5 # 4/2 " CSG. at 4699 W1200 SX. Inca-P-</u> <u>63/4</u> " HOLE TOC <u>3690 T. S.</u> 7 % "hole to 3909 то <u>4700</u> Рето <u>со То</u> 4666 Pulling Report of 9-12-80. Not yet received

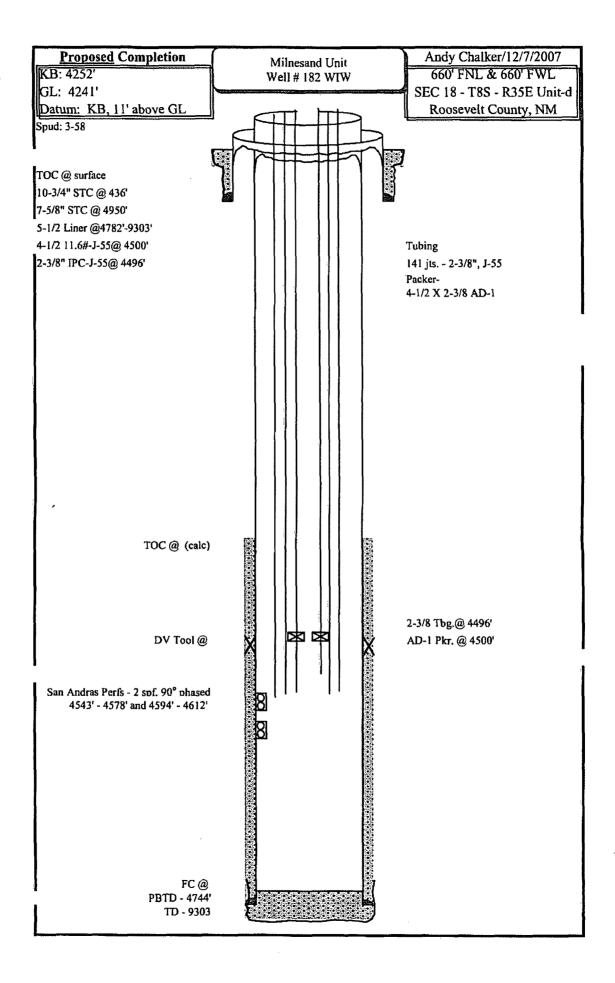


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WELL NAME: MILNESAND (S.A.) UNII WELL # 191 LOCATION: 660'FE.L.+ 1980'F.S.L., SEC 13, 7.8.5. R.34.6; RODSEVEN N.M. FIELD: MILNESAND CURRENT PROD: DATE: 6/3/77_ 7/15/61 DATE SPUDDED: DATE COMPLETED 8/1/61 PERMANENT DATUM ______ LOG MEASUREMENTS FROM _____ ABOVE PERMANENT DATUM HOLE SIZE 1214 " TOP OF CMT. AT SURFACE " PERF: 4524-66; 4580-4600 TREAT: 1000 GAL. MCA + 250 GAL GEL. ACID + 4000 GAL NE ACIO (7163) FRAC W/ 20,000 GAL. LEASE OIL + 20,000 7 20/40 SN. AIR = 22.4 APM @ 3400# 156 B.O. + O B.O. ON 32/64" de. O.P.T. - 2" EUE PROD. TUB. W/ ROD PUMA 0 412 " 11.6 # CSG. SET AT 4718 ' CMT. 1 200 SX. HOLE SIZE ______ TOP OF CMT AT ______. PAY ZONE: 4524 TO 4600 TD 4720 PB 4698 EL CHORRO EXP. INC. HALEY #1



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MILNESAND #522 30-041-20647 90' FNL & 1360'FEL SEC. 13, T8S R34E ROOSEVELT Co., NM Completion date: 5/82

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5/82: 4525'-4529' acidized w/5700 gals 15% NEFE acid

8 5/8", 24#, K-55 csg @ 378' 300 sxs "C" TOC SURFACE Hole size 12 1/4"

Perforations: (1JSPF) 4529'-4531' 4538'-4540' 4547'-4556' 4581'-4584' 4509'-4599' 4603'-4605' 4603'-4625'

TD 4750' 51/2", 14#,K-55 csg @ 4750'. 1290 sxs "C" TOC 2110'(TS)

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Current Well bore Diagram

G.L.

tbg @ 4519'

Hole size 7 7/8"	
Well Name & Number:	522
County or Parish	BOOSEVELT

Well Name & Number:	522	Lease:	MIL	NESAND
County or Parish:	ROOSEVELT	State/Prov.	NM	Country:
Prepared By:	L.A.SPITTLER, JR.	Last Revison	Date:	1/16/2008



MILNESAND #525 30-041-20650 1260' FNL & 1300'FEL SEC. 13, T&S R34E ROOSEVELT Co., NM Spud date 5/23/82

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6/82: Treated perfs w/ 5100 gals15% NEFE acid 7/82: Treated pers w/20,000 gals & 50,000 gals # 20/40

Hole in weld below bell nipple.

8 5/8", 24# csg @ 408' 220 sxs "C" TOC SURFACE Hole size 12 1/4"

5 1/2" 14#, CIBP @ 4500'.

Perforations: (1JSPF) 4549'-4552' 4555'-4562' 4579'-4580' 4582'-4584' 4587'-4592' 4595'-4604' 4620'-4622'

TD 4750' 5 1/2", 14# csg @ 4750'. 700 sxs "H" TOC 2750' Hole size 7 7/8"

Well Name & Number:

County or Parish:

Prepared By:

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525

ROOSEVELT

L.A.SPITTLER, JR.

Lease:

State/Prov.

Last Revison Date:

Current Well Bore Diagram

ELEV: 4244.5' G.R.

MILNESAND

Country:

1/9/2008

NM



MILNESAND #524 30-041-20649 1360' FNL & 90'FEL SEC. 13, T8S R34E ROOSEVELT Co., NM Spud date 5/14/82

5/82: Treated perfs w/ 4000 gals of acid

8 5/8", 24# csg @ 407' 300 sxs "C" TOC SURFACE

5 1/2" 14#, CIBP @ 4525'.

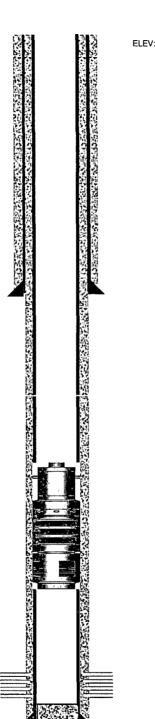
Perforations: (1JSPF) 4553'-4561' 4580'-4586' 4593'-4608' 4624'-4626'

PBTD 4740' TD 4750' 5 1/2", 14# csg @ 4750'. 700 sxs "H" TOC 2176

Well Name & Number:

County or Parish:

Prepared By:



524

ROOSEVELT

L.A.SPITTLER, JR.

Lease:

State/Prov.

Last Revison Date:

Current Well Bore Diagram

ELEV: 4239.7' G.R.

MILNESAND

Country:

1/9/2008

NM



MILNESAND #523 30-041-20648 90' FNL & 90'FEL SEC. 13, T8S R34E ROOSEVELT Co., NM Completion date: 7/82

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5/82: 4544'-4619' 4100 gals 15% NEFE acid 7/82: 4544'-4619' 20,000 gals acid & 50,000 # 20/40 san 1/94: 4240'-4286' 3000 gals 15% NEFE acid

8 5/8", 24# csg @ 395' 300 sxs "C" TOC SURFACE Hole size 12 14"

Perforations: (1JSPF) 4240'-4286' (1/1994) 4544'-4545' 4553'-4558' 4578'-4579' 4583'-4586' 4591'-4593' 4598'-4599' 4613'-4614' 4618'-4619'

PBTD 4702' TD 4750' 5 1/2", 14# csg @ 4750'. 700 sxs "H" TOC 2330'(TS) Hole size 7 7/8"

Well Name & Number:

County or Parish:

Prepared By:

and			ELEV
		N. T. S. S. S.	

523

ROOSEVELT

L.A.SPITTLER, JR.

Lease:

State/Prov.

Last Revison Date:

MILNESAND

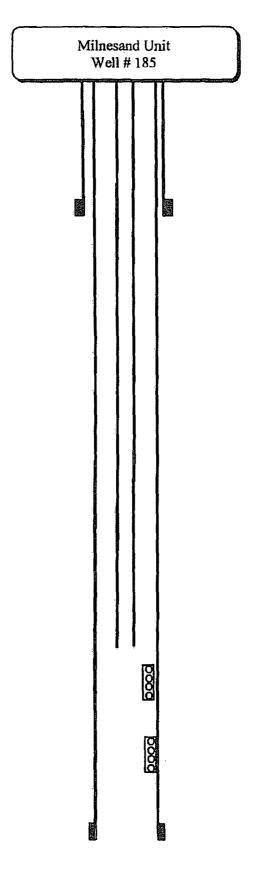
Country

1/16/2008

NM

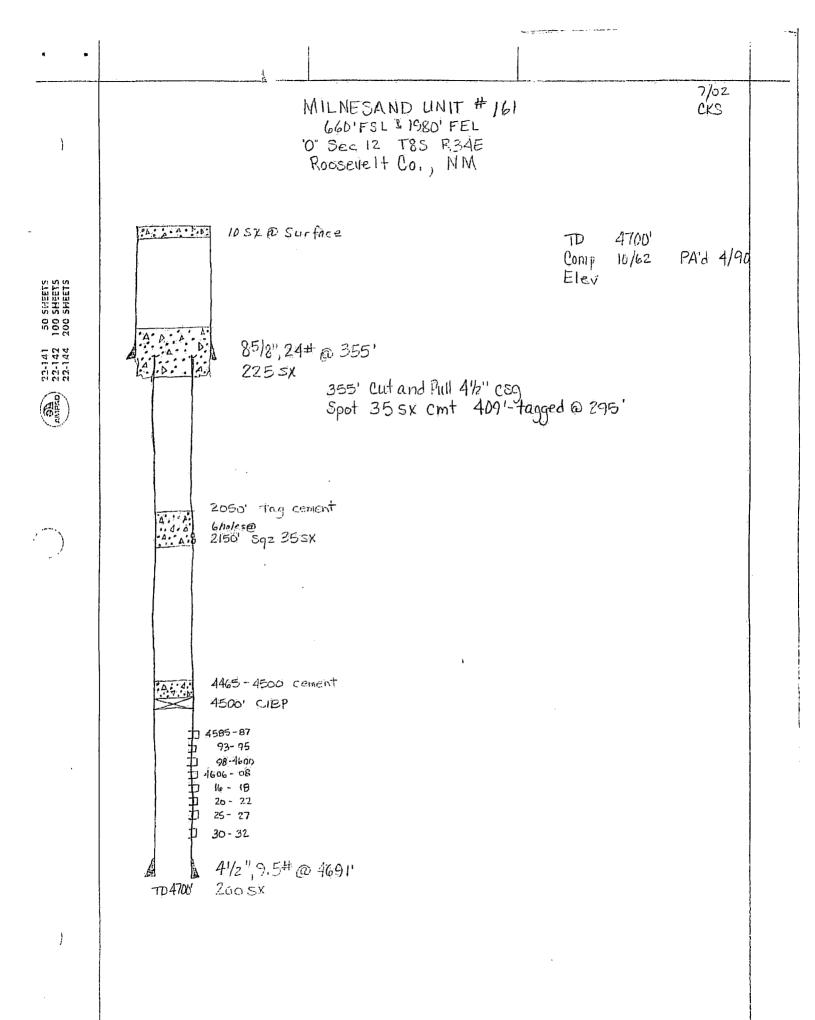
Current Well Bore Diagram

ELEV: 4238.6' G.R.



Location 660' FNL & 1903' FWL SEC 18 - T8S - R35E Roosevelt County, NM Date: 4/16/1963 **Elevation** KB: 4249 ft Casing Detail TOC @ surface 8 5/8",24#@ 356' 225sks 4-1/2",10.5#,@4699' 200sks Tubing 2 3/8" tbg @4673' **Stimulation** 1000 gals 15% acid 20000 gals refined oil 20000# 20-40 sand Perforation Data 4573-4586' 4604-4622'

PBTD:	4632 ft
TD:	4700 ft



Page 1 of 3

Jones, William V., EMNRD

From: Jones, William V., EMNRD

Sent: Wednesday, April 30, 2008 12:00 PM

- To: 'Jim Skurner'
- Cc: Ezeanyim, Richard, EMNRD; Warnell, Terry G, EMNRD; Brooks, David K., EMNRD

Subject: RE: SWD_CO2 injection application from EOR Operating Company: Milnesand Unit #58 API No. 30-041-00255

Hey Jim:

Thanks for this. It looks like every concern was covered - we will set some pressure limits for water injection and for CO2 injection on this permit and you guys can run some more representative Step Rate Tests spaced around this Unit before coming in for the CO2 flood certification hearing. (don't want to limit your injection pressure too much because it might damage your injection test results?).

As I understand it, this CO2 will not be anthropogenic and EOR is not considering this to be any type of carbon sequestration project?

No word from Chris or Wayne (figured they would not comment), so I will release this permit - probably Friday or Monday, I am the hearing person tomorrow.

Let me know any other concerns you have as I write this permit - we want the test to go well also.

Good luck with this.

William V. Jones PE New Mexico Oil Conservation Division 1220 South St. Francis Santa Fe, NM 87505 505-476-3448

From: Jim Skurner [mailto:jskurner@enhancedoilres.com]
Sent: Wednesday, April 30, 2008 11:23 AM
To: Jones, William V., EMNRD; Williams, Chris, EMNRD; Price, Wayne, EMNRD; Ezeanyim, Richard, EMNRD; Brooks, David K., EMNRD; Warnell, Terry G, EMNRD
Cc: rlongmire@enhancedoilres.com
Subject: RE: SWD_CO2 injection application from EOR Operating Company: Milnesand Unit #58 API No. 30-041-00255

Hello Mr. Jones,

Sorry for the slow reply but wanted to include our new Land Manager, Russell Longmire, on the e-mail who started this week. My answers are below to the questions. If I've missed one please advise. Thanks.

- 1. Yes, the person we noticed was Orbrie Luman the land owner of the proposed injection well site. We did not provide any additional literature on dangers of CO2 release in the area but can send that via registered mail if required.
- 2. The proposed injection well site is private land, federal minerals. Per contact with Gary Gourley in the Roswell, NM BLM office, the conversion to injection of an existing well is a sundry notice. He would prefer to have the notice filed once there is a signed & approved copy from the State OCD to make "it easier to track and prevent repetitive work" versus putting it into their system early under "pending"
- 3. The nearest residence is 1.25 miles from the proposed well and is the land owner noticed above.
- 4. Well injection pressure max was estimated using an approximate CO2 density of 43 lbm/ft"3 which corresponds to roughly 120 deg. F. This represents a high-end temperature operating condition for the proposed location. The attached spreadsheet contains the rate projections graphs for the "low, expected &

- high" cases based off of the KinderMorgan scoping model which uses a San Andres Type curve response. On the second tab, in the spreadsheet is step-rate test data from the Milnesand Unit #182 well taken this winter which is 1320' from the proposed well. The test estimated a fracture gradient of 0.74 psi/ft. Please advise if I need to break out water injection versus CO2 injection wellhead limits on the application to further insure we stay below the fracture gradient until we can run a step-rate test on the proposed well.
- 5. Also attached is the printable version of the surface diagram. The diagram is not to scale and contains a good portion of the existing infrastructure in the field. Parts A-F represent the proposed CO2 injection, parts G&H are existing facilities and how they relate to the proposed well.
- 6. We will set the packer no more than 100' above the injection zone and have made changes to our well procedure
- 7. We will have the proposed well casing tested to State specifications prior to any injection and understand if it fails this test we cannot us it in the proposed project.

Best Regards,

Jim Skurner, P.E.

Manager Reservoir Engineering Enhanced Oil Resources, Inc. Bus. - (832) 485-8500 x505 Mob. - (713) 299-0267 Fax - (832) 485-8506 www.EnhancedOilRes.com

From: Jones, William V., EMNRD [mailto:William.V.Jones@state.nm.us]
Sent: Wednesday, April 23, 2008 12:30 PM
To: jskurner@enhancedoilres.com
Cc: Williams, Chris, EMNRD; Price, Wayne, EMNRD; Ezeanyim, Richard, EMNRD; Brooks, David K., EMNRD; Warnell, Terry G, EMNRD
Subject: SWD CO2 injection application from EOR Operating Company: Milnesand Unit #58 API No. 30-041-00255

Hello Mr. Jim Skurner, P.E.: This is my first formal reply to your application:

I have looked over your application for your proposed one well pilot CO2 injection project in the Milnesand San Andres Unit and have a few questions below.

<u>Also, am copying Chris Williams and Wayne Price to make sure all bases are covered from their angles such as safety etc.</u> Hopefully they will let me know ASAP if they see any problems - I will hold this a few days for their feedback and for your answers. EOR Operating will be continually working with Chris and Wayne or their personnel as the project gets started. I see that you noticed only one party in this application - can we assume that is the surface owner? So the State Land Office or the US BLM is not involved here at all? Is this surface owner aware of any dangers of possible CO2 releases in this area? Where is the nearest residence to this proposed injection well?

Background I found on this Project:

The Unit was approved in Case 4139 with R-3766 on May 28, 1969. The waterflood was approved by the Commission in Case No. 4140 with R-3770 on May 28, 1969. The Commission in Case No. 4433 with Order R-3770-A prohibited the use of Fresh Water as makeup fluid - apparently this area has or had LOTS of Devonian water available. If EOR will need fresh makeup water for any CO2 injection project - you will need to ask for R-3770-A to be rescinded.

Order R-3770 approved the use of 28 wells for injection. Apparently all but 12 of those original injection wells have been plugged. Administrative Orders No. WFX-440, 464, 519, and 574 approved a total of another 10 wells for injection. I am attaching a list of wells operated by EOR Operating Company in this Unit, showing the production wells and the wells that are approved for injection and have listed the maximum pressure allowable in the right hand column. The older orders did not limit injection pressure - the Division decided years ago that these older injection permits are grandfathered as to pressure limits. However, if and when EOR Operating comes to hearing to certify this Unit as a bigger scale CO2 injection project, then pressure limits would be imposed in any resulting order. Please let me know if any info on this attachment is inconsistent with what you understand.

As you know, our policy is to first impose a surface injection pressure limit for water injection of 0.2 psi per (foot - to the top of the injection zone). The operators then run step rate tests sometimes accompanied with injection profiles to justify increased pressure limits. CO2 density is

obviously less than water and other CO2/Water/Produced gas injection projects impose different pressure limits depending on what Fluid is being injected.

Your application asks for 2000 psi as the maximum surface pressure needed for CO2 injection into this well. Please expound on why this pressure is needed and whether that much pressure poses a risk for fracturing. Also, what maximum surface injection pressure is needed under only water injection into this well and why? What is the expected schedule of injection of CO2 alternating with Water?

The CO2 facility diagram with the application is so small it is difficult to read - would you please send by email or mail a bigger version and send a written explanation of what is happening with this little plant?

The OCD policy is to require the injection packer to be set within 100 feet of the top of the injection interval and the rathole below the injection interval to be limited in length also. The goal is to ensure isolation of injection into only the permitted injection interval and to enable a maximum length of tubing-casing annulus to monitor for competence or "integrity". Your application shows the injection packer to be set approximately 500 feet above the injection interval - the order will specify only 100 feet maximum unless you have some valid reason otherwise?

This Unit is full of very old wellbores - but cement tops appear to be above the San Andres injection interval in all wells. This well picked for injection of CO2 seems to have had casing repairs in the past. All injection wells must have casing that can withstand 500 psi over a column of water for 30 minutes or as the district inspectors direct. I am sure you are aware that if this casing cannot hold pressure, another well will be required for this trial injection project - and that would require another C-108 form and application to inject.

Congratulations on being the operator of many old wells and also being in compliance with the Division's Rule 40 - must have took some work.

Can't think of anything else - let me know answers to the above concerns as soon as is practical.

Regards,

William V. Jones PE New Mexico Oil Conservation Division 1220 South St. Francis Santa Fe, NM 87505 505-476-3448

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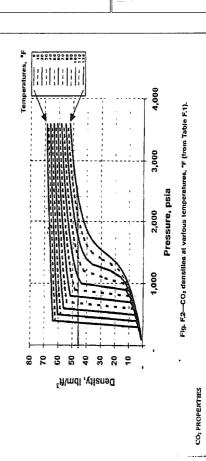
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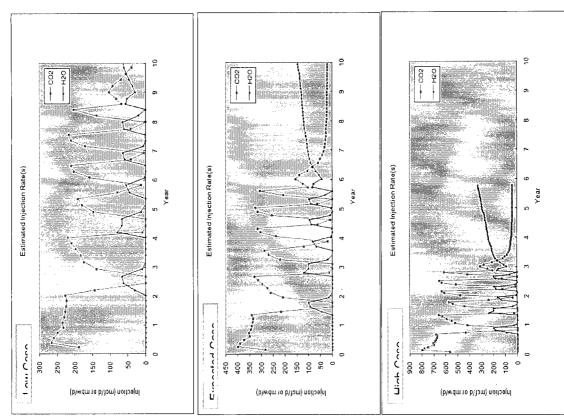
Additional Attachments

EOR Operating Company Milnesand Unit #58 Injection Permit Forecast

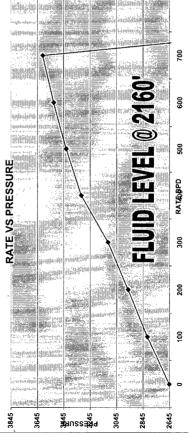
Expected UUZ INJ. Rate =	375 MCFPD
Max. CO2 Inj. Rate =	800 MCFPD
Expected H2O Inj. Rate=	100 BWPD
Max. H2O Inj. Rate=	300 BWPD
Max. Total CO2 Inj =	561 MMCF
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Max. Inj. Pressure=	2000 psi

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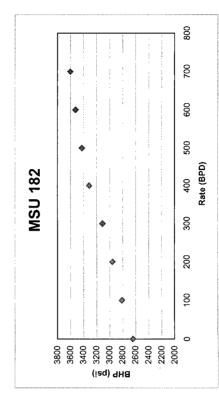
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Reservoir Estimation Spreadsheet

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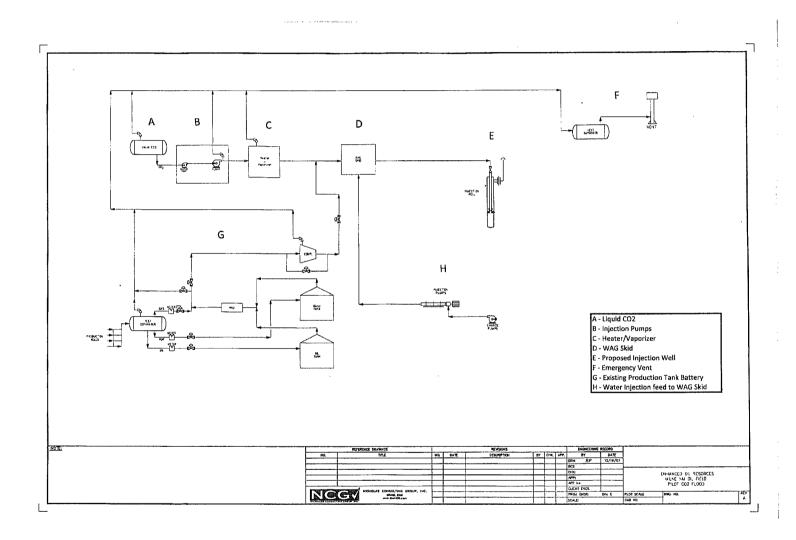
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Gray Wireline Data - MSU #182	Reservoir Estimation Spreadsheet Gray Wireline - MSU #182	Fracture Pressure Step-Rate Test Fracture Pressure= Depth= Frac Gradient=	Bottomhole Injection Pressure - Water Max Surface Pressure=FracPressure- where	Hydrostatic Gradient= Depth= Max. Inj. Surf. Pressure=	Bottomhole Injection Pressure - CO2 Max Surface Pressure=FracPressure where:	CO2 Gradient= Depth= Max. Ini. Surf. Pressure=



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