State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

David MartinCabinet Secretary-Designate

Brett F. Woods, Ph.D. Deputy Cabinet Secretary Jami Bailey, Division Director Oil Conservation Division



October 2, 2013

Mr. Billy Prichard Mar Oil and Gas Corporation P. O. Box 5155 Santa Fe, NM 87502

RE: Packer Setting Depth Exception

Injection Authority: Order No. R-3115; Eumont Hardy Waterflood Unit

Pool: Eumont; Yates-Seven Rivers-Queen

Eumont Hardy Unit Well No. 37 API 30-025-09902 Unit F, Sec 5, T21S, R37E, NMPM, Lea County, New Mexico

Mr. Prichard:

Reference is made to your request on behalf of Mar Oil and Gas Corporation (OGRID 151228; the "operator") received by the Division on September 19, 2013, for the above named well. The operator applied for exception for setting the packer within 100 feet of the top of the approved injection interval.

It is our understanding that mechanical integrity testing conducted on this well following the replacement of tubing and packer system was only successful with the packer set at a depth of 3402 feet. This location of the packer is approximately 120 feet above the top of the open-hole injection interval that begins at 3522 feet. The approved injection interval is from 3522 feet to 3780 feet.

For the reasons stated in the application and because it appears that correlative rights are protected, waste will not occur and this modification will not endanger any fresh water aquifer or the environment, the exception is granted. The packer location within this well shall not be set higher than 120 feet unless the operator receives written approval from the Division Director.

The Division Director may rescind this exception if it becomes apparent that the injected fluid is not being confined to the permitted interval or is endangering any fresh water aquifer.

Packer Setting Depth Exception Mar Oil and Gas Corp. October 2, 2013 Page 2 of 2

Sincerely,

JAMI BAILEY

Director

JB/prg

cc: Oil Conservation Division – Hobbs Office

Case File 3429

Well File API 30-025-09902

September 17, 2013

Mr. Phillip Goetze EMNRD Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87504 RECEIVED OCD

Dear Mr. Goetze

Exception to Rule 19.15.26.10A
Mar Oil and Gas Corporation
Eumont Hardy Unit # 037
API 30-025-09902
Lea County, New Mexico

Mar Oil and Gas Corporation request an exception to Rule 19.15.26.10A, concerning the US EPA guidance of 100 feet rule for injection packer setting depth.

Mar has pulled and replaced the internally plastic coated tubing and plastic coated packer on the Eumont Hardy Unit # 037. Several attempts were made to pressure test the well with the injection packer set at 3431 feet. Only after pulling the packer to a depth of 3402 feet were we able to get a successful pressure test. The casing shoe on EHU # 37 is set at 3522 feet above the open hole injection interval 3522 feet – 3780 feet.

A well bore schematic and a copy of the C103 that was submitted to NMOCD District 1 office for information and review.

Your administrative approval of this request will be appreciated. If additional information is desired, please contact me at 432-934-7680 or email at billy@pwllc.net

Yours truly,

Billy E. Prichard Field Supervisor

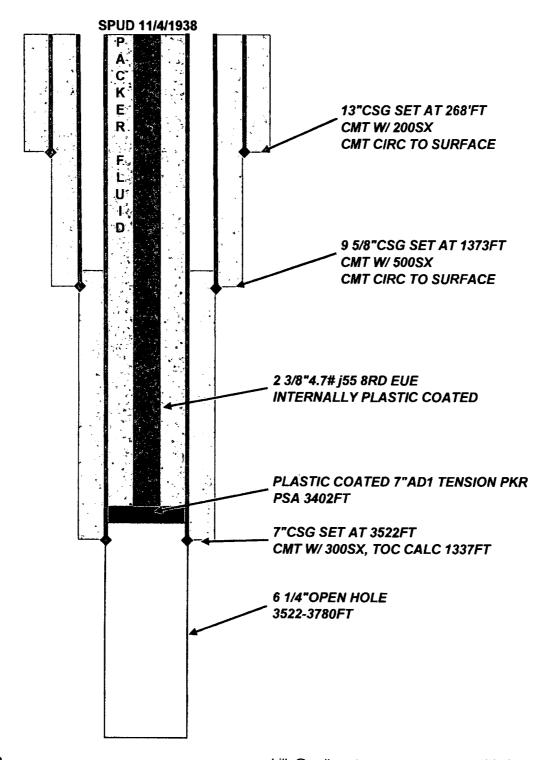
Mar Oil and Gas Corporation

Billy E. Pruhm

Attachments

Mar Oil and Gas Corporation

Eumont Hardy Unit # 37 WBD 9/3/2013 API 30-025-009902



BEP