LAW OFFICES OF MICHAEL DANOFF & ASSOCIATES, P.C.

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OUR FILE NO

4661 A26

July 29, 2015

VIA EMAIL ONLY

Einest L Padilla, Esq PO Box 2523

Santa Fe, NM 87504-2523

VIA EMAIL ONLY

Mi Michael McMillan 1220 South St Francis Drive Santa Fe, NM 87505

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VIA EMAIL ONLY

Mi William V Jones 1220 South St Francis Drive Santa Fe, NM 87505

VIA EMAIL ONLY

Mt Katherine Moss, Esq PO Box 1148 Santa Fe, NM 87504-1148

Re Protest of Drilling of New Salt Water Disposal, Cooper 17 Well #1

Dear Ladies and Gentlemen

I am writing on behalf of my client Randy Briggs in regard to the above captioned matter I previously sent a letter on February 16, 2015 and in anticipation of the hearing on August 6, 2015, I am providing a revised copy of the letter. My client is providing this notice of protest in response to Oasis Water Solutions, LLC's public notice of application to the NMOCD to drill and complete a salt water disposal well (the Cooper 17 well #1) for the following reasons,

- 1 You should be advised that notice of intent was not published in the Hobbs NM newspaper, which is the appropriate newspaper for where subject well is to be located
- 2 A form was submitted by Horizon Oil and Gas reports the original drilling, casing, and cementing operations. It indicates 13 3/8 inch surface casing set at 250 feet, cemented to surface, 8 5/8 inch casing set at 1215 feet, also with cemented circulated to surface. Please see the Oil Conservation Division report dated July 9, 1987 attached hereto as Exhibit 1

- A form submitted by Horizon Oil and Gas reports five and a half inch (5 1/2") casing ran to 6539 feet, and cemented with 820 sacks cement. Of important note is that this cement job was evidently done in one operation without the use of a DV tool. There is no report of circulation, no report of waiting on cement after first stage cementing, and no verification of cement top by bond log or temperature survey. The only TOC notes is an estimation by calculation. Please see the Oil Conservation Division report dated August 13, 1987 attached hereto as Exhibit 2.
- 4 Attached hereto as Exhibit 3 is a portion of the original drilling report in which formation tops were noted
- A form submitted by Smith & Mair, Inc details the steps taken to convert this well from a producing well to a salt water disposal well. The top and bottom perforations permitted for SWD service are in "the lower San Andres". The well was put into SWD service in February 2006. Please see Oil Conservation Division Report dated February 20, 2006 attached hereto as Exhibit 4.
- On or about July 1, 2014 subsequent to the well being transferred to J Cooper enterprises, notice was given to the NMOCD that a pressurized water flow had been discovered at surface (in the 5 1/2" x 8 5/8" annulus), the well had been shut in, and disposal activities were ceased Please see Oil Conservation Division Reported dated July 1, 2014 attached hereto as Exhibit 5
- A form dated October 1, 2014 was submitted to NMOCD on October 1, 2014 reporting the remedial work that had been done to the well during the months of July 2014, and August 2014 Please see Oil Conservation Division Reported dated October 1, 2014 attached hereto as Exhibit 6
- 8 On or about July 2014, work was done on the well to attempt down hole repairs On July 7, 2014, twelve (12) joints of three and a half inch (3 1/2") injection tubing were being pulled and laid down. Three (3) of those joints had holes due to corrosion. On July 8, 2014 thrity-five (35) joints were pulled and laid down that had holes, and one hundred seven (107) joints were pulled and laid down that did not have holes. On July 11, 2014 a retrievable bridge plug was ran to 4,253 feet and set in the five and a half inch (5 1/2") casing. A packer was then set immediately above the bridge plug, and there was an unsuccessful attempt to pressure test the bridge plug. The bridge plug was subsequently moved to 4,237 feet and reset. Again a successful pressure test could not be achieved on the bridge plug. During the day, the plug was moved a total of nine (9) times and retested, all testing events resulting in failed pressure tests. The bridge plug was then ran back down to 4,188 feet and reset in the five and a half (5 ½) casing. Fourteen (14) subsequent pressure tests with the packer set at depths ranging from 1,159 feet to 3,517 feet resulted in

- failed tests On July 14, 2014 the compression type packer was pulled and a tension type packer was ran Good casing was subsequently proven by pressure testing only ABOVE the packer when set at 1,159 feet Please see the daily log attached hereto as Exhibit 7
- 9 There is no record of the bridge plug that had been set at 4,188 feet ever having been pulled However, on this day a cast from bridge plug was ran and set on wire line at 4,300 feet in the five and a half (5 ½) casing Also on this date a gamma ray log was pulled "to 3,200 feet" It is not reported from what depth the log was pulled If the log was run to discover top of cement no TOC was subsequently reported
- 10 On July 18, 2014 it was reported that the casing was squeezed with twenty (20) BBLS water glass, and seven hundred (700) sacks cement. The method used to squeeze was not reported.
- 11 On July 21, 2014 a drill bit was run, and cement was tagged at 1325 feet However, the hole could not be circulated for drilling
- 12 On July 22, 2014 the well was squeezed with twenty (20) BBLS water glass and 200 sacks cement. This was accomplished by displacement down casing behind a wiper plug.
- 13 On August 8, 2014 a cement retainer was run to 1105 feet and set
- 14 On August 19, 2014 one hundred fifty (150) sacks cement were pumped through the retainer at 1105 feet. No pump pressures were reported
- 15 Exhibit 8 is a graphic of assumed current well conditions

Because of the above reported activities and indicated well conditions at the T. Anderson well #1, my client objects to the permitting of the Cooper 17 well #1 for disposal use. During the course of all work done to the Anderson #1, no successful casing test was ever accomplished between the packer and bridge plug. The only successful pressure was above the packer and only identified the upper extent of bag casing, not the lower extent Also, the CIPB currently set at 4300' was not tested, and there is no verification whatsoever that the plug is properly set or is holding properly. There is also no report of the CIBP being capped with the cement, as is common practice. Because the casing is obviously has breeches to the salt, and the salt is well known in this area to be wet, there is no reason to believe that any squeeze resulted in cement staying behind the five and a half inch (5 1/2") production string as would be required to prevent brine flow from the salt. It would also be reasonable to expect that flow could be passing the untested CIBP currently set above the San Andres, potentially resulting in flow to higher productions zones. It is logical that the radioactive log that was ran was to identify TOC, however, no TOC was reported. Considering that original reports suggest this well was cemented from

6,539 feet in one stage without the use of a multi stage cementing tool, and considering the great extent of five and a half inch (5 1/2") casing that would not test, it would be very reasonable to predict a very poor TOC Further, this well is located in an area of high pressure secondary recovery efforts (water flooding), which makes casing integrity especially important. Allowing further injection in this area might only increase the likelihood of cross flow and subsequent damage to valuable producing formations in the area, as well as potential damage to the casings in surrounding wells. For the aforementioned reasons, my client provides this notice in protest, and believes that the Cooper 17 well #1 should not be permitted.

Should you need any further information or supporting documentation, please do not hesitate to contact my office. I look forward to hearing from you with regard to this matter

Very truly yours,

MICHAEL DANOFF & ASSOCIATES, P C

Michael L Danoff

MLD/aal Enclosures

cc Di Randy Briggs

STATE OF NEW MEXICO ENERGY AND MINERALS DEPARTMENT

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	PHONE 575- 92 23_(
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APIROVED BY Majeut Blain Title Dist Super	MAON DAY 10/1/2014
Condition of App as I cit mill	′ ′ ′ ′
•	Oct 0 1 30141



#### 7 7 2014

Miru Tyler Pulling unit nipple down well head and nipple up blow out preventer. OP release paker in 4 hours lay down 12 joints and had holes in 3 of those joints. Shut down over night

#### J Cooper Enterprises

#### 782014

Continue trip out of the hole laying down 3 1/2 tubing laid down 35 joints with holes and 107 of good joints. Shut down over night

#### J Cooper Enterprises

#### 7 9 2014

Unload and rack up joints of 3 1/8 EUE 8rd 9 3# J 55 tubing Pick up arrow set packer trip in hole Picking up 3 A" Lubing to 4255 and set packer Unable to load casing with 160 barrels packer fluid. Shut down over night

#### J Cooper Enterprises

## 7 10 2014

Stood by wreline truck from 9 00 am until 12 00 Pick up 2 313 profile plug. Till and set plug in packer unable to lock plug in packer in 2 runs. Relief arrow set packer trip out of hold with 3 3 " tubing and packer SDON.

### J Cooper Enterprises

#### 7 11 2014

Continue trip in hole with tubing to 4253 and set retrievable breech plug pull up hole and set packer at 4220. Set packer test RBP to 1000// and lost 120// in 7 min. Move plug to 4237, and set RBP and packer at 4220, and test to 800// and lost 60/// in 3 min. drop siv. and test tubing to 1000/// (ok) move RBP to 4220, and set packer at 4183, and test to 1000/// and lost 300 / jn 45 min. Move RBP to 4205// and packer at 4183, and test to 940/// and lost 100/// in 4 min. Move RBP to 4188, and packer to 4150// and test to 950/// and lost 100/// in 5 min. Move RBP to 4052, and test to 900/// and lost 50/// in 3 min. Move RBP to 4027// and packer to 3988, test to 950/// and lost 100/// in 5 min. Move RBP to 3707, and packer to 3668, and telet to 1000/// and lost 120/// in 5 min. Rim in hole to 4188, and set RBP pull up hole to 3517, and test to 940/// and lost 120/// in 5 min. Pull up hole with packer to 2549, and set packer and test to 900/// lost.



104 m 5 min PuH with packer to 1582 and rest to 1704 lbs 1000 m in 1 min 14H with tubing it 18 to and on yack At 2 bp in Run in hole to 2003 and or rack at 5 tpm. Run in hole to Brit 2132, and se packer 65 to 940 fair of lost 100 fin in in Pull of hole to 70 m in 8 min Pull of hole to 70 m in Pull of hole to 2063 and set packer and on sack 2 bpm. All and et packer at 8 m in Pull of hole to 2063 and et packer by 10 m in Pull of hole to 2063 and et packer by 10 m in Pull of hole to 2063 and et packer by 10 m in Pull of hole to 2063 and et packer by 10 m in Pull of hole to 2063 and et packer by 10 m in Pull of hole to 2063 and et packer by 10 m in Pull of hole to 2063 and et packer by 10 m in Pull of hole to 2063 and et packer by 10 m in Pull of hole to 2063 and et packer by 10 m in Pull of hole to 2063 and et packer by 10 m in Pull of hole to 2063 and et packer by 10 m in Pull of hole to 2063 and et packer by 10 m in Pull of hole to 2063 and et packer by 10 m in Pull of hole to 2063 and et packer by 10 m in Pull of hole to 2063 and et packer by 10 m in Pull of hole to 2063 and et packer by 10 m in Pull of hole to 2063 and et packer by 10 m in Pull of hole to 2063 and et packer by 10 m in Pull of hole to 2063 and et packer by 10 m in Pull of hole to 2063 and et packer by 10 m in Pull of hole to 2063 and et packer by 10 m in Pull of hole to 2063 and et packer by 10 m in Pull of hole to 2063 and et packer by 10 m in Pull of hole to 2063 and et packer by 20 m in Pull of hole to 2063 and et packer by 20 m in Pull of hole to 2063 and et packer by 20 m in Pull of hole to 2063 and et packer by 20 m in Pull of hole to 2063 and et packer by 20 m in Pull of hole to 2063 and et packer by 20 m in Pull of hole to 2063 and et packer by 20 m in Pull of hole to 2063 and et packer by 20 m in Pull of hole to 2063 and et packer by 20 m in Pull of hole to 2063 and et packer by 20 m in Pull of hole to 2063 and et packer by 20 m in Pull of hole to 2063 and et packer by 20 m in Pull of hole to 2063 and et packer by 20 m in Pull of hole

Couper Fr terprises

7 _4 2011

André sun au S'ND

Pulluphole of 1745 selpacker and unable to fradicating Pulliphiole to 4.9 set packer it all le to load daying Trip out of licies ith tubin and compression packer Ripup fension pinker. Trip in Jule to 1419 and set packer or able to load doing Peleuse picker PUH to 1996 set a cker test calling to 500 handles 50 min Release packer RIH to 1225 and set packer. Test had neglected by lest SUOP in 5 min 2011 to 1159 soft packer to sticker of 550 from 15 min look) Isolate casing leak between (1159, 2094), 940

J Conpet Enterp ises

3 15 2014

Rib up called to a Wireling touck Camphagur and CM CIBP TIM and pull correlation ing to 3200 and set Cibp at 4430 TOHing do in wire line TIM until 3.5 IPC to bing TOH In the Journ 3.5 tubing. Shut do anotel and to

J Cooper Enterprises

7 16 2014

Shut dos n

Couper Enterprises

71/211

Set rac ack and half tank lay line from 8 3/8 to tank

JCoope Ente prises

7 18 2014

QU Pass I newly Services a cistar 5 of cisting with 70 bbl 1 q i della siand 200 sks. The otiopic continued at 14 bf ppg and distilace into 13.8 bb 51% CWI and silvid do you light

I Cooper En erprises

/ 21 2014

Pick up 1% bit and bit sub-11H with tubing to 1325 and tip cmt. Rup reverse unit and chable to cir. hole With 100 BFV* TOH with tubing and bit CWI and shuld on novel might. Viailing on cir.

I Cooper Enterp ises

7 22 2014

Stood by for Basic until 11 00 am Rightpland pump 20 bb inquided is and 200 sks til worrip cmixed at 13 2 ppg and 13 00 sks. CLS i Clineat city oth 74 cct id act 4 8 pbg and 12 bill FW behind where ing All down 5 of citig Citiand SDON.

I Couper hi terprises

7 22 2014

Nipple dot in plug head and in pplotup BOP Pullup 13 bit "IH with tubit ato 1752, and tag top of common 10th such tubing and bit. Nipple dot in BOP and nipple tip a is picy need CM and SOOK.

Cooper Enterpri es

174 2014

Rigiou Basic Energy Scientes and purip 20 bbilliou digitas, and 200 sks This strop comised at 13.7 ppc and 200 sks This strop comised at 13.7 ppc and 200 sks This strop comised at 13.7 ppc and 200 sks This strop comised at 13.7 ppc and 200 CCL and displacing and 3.8 of behind wheer place Cowland SDON

Jucoper En Lipris S

7 25 2011

tilppedowr plub head and nipple up BOP Politu4" bit TI (vi hitubing of 1251) and tag top of cmt had 1 of fill Rig up release to 11 Broke in out tubing at 3.91 pm with a bPM releases TOH with that is and Lit CWI and SDON

20 70 4

Pip Up Brilic in eight Services Pump 70 bhf liquid glass and 200 iks in not opic mixed a 13.2 ppp and 200 sks Cls. Chineat in xi ci at 14 8 pps and 28 CCL Displaced with 9 bit Violated in in plug (Villard S) Ott

J Couper En erori es

7 28 2011

to the first of the standard completion BOP Pullup 47 by TIM with tubing to _2~5 and tagem op 3 g to testing the first of the same of the standard complete standard companies and the same of the sam

J'Cooper interp es

~ 29 2014

Right program to Pomp 20 bbl figuidigiess and 200 sks Cls. C. With 690 gcl and 190 so thind 3 PPS kgl seal mixed at 17 5ppg and 100 lks Cl. "C. peut mixed at 14 8 ppg and 100 lks Cls. C. With 2% CCL mixed at 14 8 ppg 0 fo 290 to 3 with le pumping cm). Inplaced with 6 5(17 kind day in Basic Chy) and 500M.

J Cooper Enterprilles

7 30 20_4

Nipple cown plug 1 ead and pipple up BOP Pull up 4 % bit TIH in the ubing and tag top of cmt at 1725. Rig up reverse unit and load hole with 18 BW or flore a 2 % bpm with _# 3BL. Recurs shut in for 30 min and to k abbit to regain or shut in 15 min and to k abbit to regain or 7 TOH with 16 bins and bit TIH with open a ced tubing to 274. CWI and 570.

I Coopér Enterprises

7 31 2011

制しい Basin Tringy Services Spot 75 SSS cl C neatmined will 上をclut 122.1 OH with oblig Inadices its into 3 http:// TIH wait 4 hr TIH with tubing and tag cont at 455 TOH SDON

Į

8 1 2014

Pull up 4 A bit and 6 3 Y drill collars TiH with tubing to rig up reverse unit 0 0 good cmt from 455 to 6/3 $^{\circ}$  (218) circlean CWI and SDON

J Cooper Enterprises

8-4 2014

Continue D O good cmt from 73 to 897 (224) and cir clean CWI and SDON

J Cooper Enterprises

8 5 2014

TOH with tubing and bit pull up 4 more 3/4 drift collars (total 10) TiH with bit and tubing to 897' Rig up reverse unit Continue D O good cmt to 1108' and cir clean Test casing to 500# for 10 min (ok) CWI and SDON

J Cooper Enterprises

8 6 2014

Rig up reverse unit Continue DO good crit from 1108 to 1173 and cir clean Test casing to 500 / for 10 min (ok) Drill to 1205 cir Clean and test to 510 for 15 min and lost 20# in 15 min Continue DO cmt to 1224 and fell out to 1234 and tag lost cir Unable to regain with 40 bits IOH with Jubing bit SDON

J Cooper Enterprises

8 7 2014

Waiting on cmt.

J Cooper Enterprises

8-8 2014

Stood by for Basic until 10 00 am Rig up and pump 10 bbl liquid glass and 300 sks. Cls. C. with 6% gel and 5% sait and 3# ppg. Kol seal mixed at 12 5 ppg. 100 sks cls. C" neat mixed at 14 8 ppg and 100 sks Cls. C' with 2% CCL mixed at 14 8 ppg and flushed with 10 8FW. CWI and SDON

8 11 2014

Pull up 4% bit T/H with tubing to 1228 and tag cmt TOH with tubing and bit Pull up 10 3 ½" drill collars and bit T/H with tubing to 1228' Rig up reverse unit D O to 1234 and test casing to 300# and 500# (ok) D O to 1237 and started losing water Test to 300# and lost to 0# in 2 min Unable to regain or With 40 BFW at 4 bpm sucking 8 bpm TOH with tubing and bit SDON

J Cooper Enterprises

8 12 2014

Shut down walting on cement trucks

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8 13 2014

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8 14 2014

WOC

J Cooper Enterprises

2014 د 8

WOC

J Cooper Enterprises

8 16 2014

WOC

8 17 7311

740C

J Coope et terorises

4 18 7911

Pull up 1 to bit 11 with 10 an Icollars and ubirg to 120/ and tapking it group it to 10 fair cont to 235 and lost cir. Unable to load hole with 25 31/ 10H with to bing and by down 10 dr it collar bull up 5 1/2 contine and one of the collar form recainer land casing

J Cooper Ente prises

8 19 2014

Right desirences Pump 150 sks L s "Concert mixed at 148 ppg thru retail or full out of retainer receive in 1 abject 10H laying down 27/8 tubin. Numberlove BOP With CV and righter pulling and 10 of non-left

WELLBORE SCHEMATIC AND HISTORY COMPLETION SCHEMATIC AP AUH 130-025-20062 OPERATOF J CODEN ENTERPRISOS FOR TOPPIN EL_10 O SE 205 FY TOUTEN 330 FSL SBO 6033 PBD Dr 3535 PCOL الح الم 5118 5178 DAL 4 HOLL Honument Paddock 1233 5 93-5776 @ 250 PERFS Honomant I Imebry 6362-6460 ddd Inemirao i JPENH LL PERFS OPE LILLE Cenera Retainer 1105 RPUS F 1080 41500 Hale ,s & 7215 CASING RECORD 1224 CIT 260 Xs ㅋ^ <u>- 디 E</u> Circ 1238 1328 250 17 8 5.8 1215 6 1/2 6539 470 sxs 1214 Cira 620 sxs 77/8 劉文OC 1600 ost H has IN has Aq 2014 \$ 2068 2432 tos PK.L Soven A v 3171 Osean 0181 4300 PAC Fun 4350 to 4800 eraybe 3 3636 Son Ar d 5165 G rieta 를 Pora 118 178 평 Paddren 5170 وديد أقرأ 5590 Ports 5..93 5700 Perta 5708 726 Tu-b € 35 Ports 6362-6371 Ports 6-52-6466 Sqz 5172 O 6, p PREMATORY U DA FD



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