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June 14, 2000

J.E. GALLEGOS *

VIA HAND-DELIVERY

Lori Wrotenbery, Director
New Mexico Oil Conservation Division
2040 S. Pacheco Street
Santa Fe, New Mexico 87505

VIA HAND-DELIVERY

William F. Carr
Campbell, Carr, Berge & Sheridan, P.A.
110 N. Guadalupe, Suite 1
Santa Fe, NM 87501

Re: Application of Amerada Hess Corporation for Approval to Conver the NMGSAU wells Nos. 215 and 503 to Injection in the North Monument Grayburg San Andres Unit, Lea County, New Mexico

Dear Ms. Wrotenbery and Mr. Carr:

Please accept this letter as a statement on behalf of Doyle Hartman, Oil Operator, to be made part of the record in this case.

Hartman wishes to alert the Division to the widespread and ever increasing waterflows being encountered in Lea County due to the out-of-zone water from various waterflood, secondary recovery units. This is a serious problem requiring attention by the Division. Hartman and other operators are encountering the out-of-zone waters (1) in gas formations in proximity to the target oil formations, (2) in the salt formation and (3) recently even in the shallow fresh water formations.

The specific injection well conversions sought by Amerada Hess are not objected to by Hartman, but he requests that the Hearing Examiner inquire and the Division order that the applicant demonstrate the following:

A. The primary cement job for the proposed wells has not been compromised by nitro-glycerin stimulation or by acid treatments.

B. The injection wells demonstrate acceptable cement bonding and pipe through state-of-the-art test tools.

C. The wellhead injection pressure for the proposed wells will be kept at or below the NMOC maximum surface injection pressure limit of 0.2 psi/ft

D. The injected water will always be contained in the unitized interval of the Eunice Monument Grayburg San Andres pool

E. Each well and the overall project injection-to-withdrawal ratios are kept at 1.0 or less.

We appreciate the Division's consideration of this request and of the issues raised and stand ready to provide any further data or information that the Division might consider of assistance pertaining to this application or generally to the escape of waterflood injection water.

Sincerely,

GALLEGOS LAW FIRM, P.C.

BY: 
J.E. GALLEGOS

JEG:sa

cc: Chris Williams, District Supervisor, Hobbs
Michael Stogner, Chief Hearing Examiner,
Chad McGee, Amerada Hess
Doyle Hartman