

DOYLE HARTMAN

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NOV 24 1999

Via Facsimile (505) 827-8177 and FedEx

November 24, 1999

Lori Wrotenbery, Director
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Re: Amerada Hess' November 17, 1999 Water Injection Application
North Monument Grayburg San Andres Unit

Dear Ms. Wrotenbery:

Reference is made to Amerada Hess' November 17, 1999 application to convert additional wells to water injection within the Amerada Hess-operated North Monument Grayburg San Andres Unit (NMGSAU) waterflood project (copy of application enclosed).

In order that we do not inadvertently waive any legal rights, while waiting to be assured that Amerada Hess' newly proposed injection wells will be operated in accordance with industry-accepted injection practice, please initially consider this letter as our objection to Amerada Hess' application.

However, please be assured that Doyle Hartman is not opposed to additional injection wells being added to the NMGSAU waterflood project providing that Amerada Hess will make a satisfactory showing that its proposed additional injection wells can be installed and operated in accordance with the following set of industry-accepted injection practices and standards:

- 1) The proposed additional NMGSAU water injection will be kept, at all times, within Amerada Hess' originally approved NMGSAU water injection interval.
- 2) The proposed new NMGSAU injection wells have been properly cemented with adequate volumes of API sulfate-resistant cement and each individual injection well cement job demonstrates satisfactory bonding and pipe characteristics using a state-of-the-art 360° bond-pipe evaluation tool such as Schlumberger's USI-GR-CCL log.

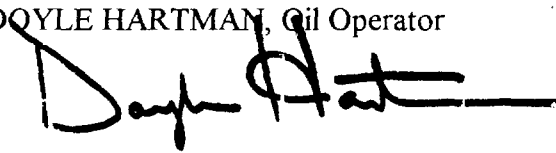
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- 3) The wellhead injection pressure for the proposed injection wells will always be kept at or below the NMOCD's maximum surface injection pressure limit of 0.2 psi/ft.
- 4) The primary cement job for the proposed injection wells has not been compromised by nitro-glycerin stimulation or excessive acid treatments.
- 5) Each individual well (as well as the overall project) injection-to-withdrawal ratio is kept at 1.0 or less minimizing the likelihood that out-of-zone non-oil-recovery injection will occur.
- 6) The proposed new injection wells do not exhibit injection profiles that indicate a large volume (or percentage) of injection water is exiting the wellbore at the upper part of the injection interval.

We are respectfully requesting adherence to the foregoing conditions since we have experienced significant negative impact (on the order of several million dollars), in the Eunice-Monument-Jalmat trend, due to water injection projects that have injected substantial volumes of water out of zone, although such injection projects were to have originally been operated in accordance with NMOCD rules and regulations, which rules and regulations prohibit high-pressure water from escaping the approved injection interval and invading overlying strata.

Very truly yours,

DOYLE HARTMAN, Oil Operator



Doyle Hartman

enclosures

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cc: **Via Facsimile (505) 827-8177 and FedEx**
Michael Stogner, Chief Hearing Examiner
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New Mexico Oil Conservation Division
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