

## ALPHA TWENTY-ONE PRODUCTION COMPANY

POST OFFICE BOX 1206  
JAL, NEW MEXICO 88252

505/395-3056

June 12, 1984

*Case 8263*

Oil Conservation Division  
P.O. Box 2088  
Santa Fe, NM 87501

ATTN: Mr. Joe Ramey

RE: Justis "BC" Federal Com No. 2  
Sec. 25, T-11-S, R-37-E,  
Lea County, New Mexico

Gentlemen:

Enclosed for your review and approval, please find our Application for Classification as a Hardship Gas Well on the above referenced well.

To support our request for the Hardship Classification, we can examine the volume of water this well produces. We installed pumping unit equipment to alleviate our problem with the average production of 10 BWPD. Taking into consideration the low bottom hole pressure of the well and the amount of water entering the wellbore during a shut-in, it would be likely that this build-up of water could kill the well. In the event that the well was killed, the water build-up would log the formation causing serious damage due to the lithology of the formation, thus causing premature abandonment of the well. Also, with the water building up during a shut-in, the problem of scale precipitation causes our downhole equipment to corrode and eventually have to be replaced. The average cost for us to get the well producing normally after a shut-in would be approximately \$1500.00 including the cost of repairing the pump, pulling unit time, replacement of rods or tubing, etc. We estimate the amount of gas reserves lost due to premature abandonment would be 476 MMCF if premature abandonment was allowed to happen.

To prevent this waste and protect our correlative rights, we would, therefore, request administrative approval to produce this well at it's present rate or at least the minimum rate of 250 MCF per day and given the circumstances and problems we have had with this well, that our Application for Classification as a Hardship Gas Well be approved.

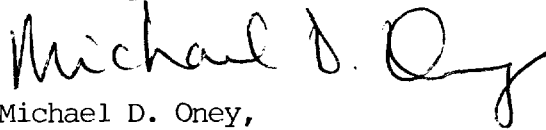
June 12, 1984

Also find for your review and records the following supportive information:

- 1) Ownership map
- 2) Wellbore sketch
- 3) Production history of well
- 4) C-102
- 5) Copy of letter to offset operators
- 6) Certified statement

If you desire any further information, please contact me.

Sincerely,



Michael D. Oney,  
Drilling Superintendent

MDO/tic  
Enclosures

cc: Oil Conservation Division  
P.O. Box 1980  
Hobbs, NM 88240  
ATTN: Mr. Jerry Sexton

El Paso Natural Gas Company  
P.O. Box 1492  
El Paso, TX 79978  
ATTN: Mr. Harvey Rodman

Offset Operators:

Apollo Oil Company  
P.O. Box 1737  
Hobbs, NM 88240

Arco Oil & Gas Company  
P.O. Box 1710  
Hobbs, NM 88240

Cities Services Oil & Gas Corp.  
P.O. Box 1919  
Midland, TX 79702

Conoco, Inc.  
P.O. Box 460  
Hobbs, NM 88240

Gulf Oil Corporation  
P.O. Box 670  
Hobbs, NM 88240

Exxon Corporation  
P.O. Box 1600  
Midland, TX 79701

Alpha Twenty-One Production Company  
2100 First National Bank Building  
Midland, TX 79701  
ATTN: Mr. Tom Phipps

Hartman, Doyle  
508 C & K Petroleum Building  
Midland, TX 79701

Mobil Producing Tex & NM Inc.  
9 Greenway Plaza, Suite 2700  
Houston, TX 77046

Sun Exploration & Production Co.  
P.O. Box 1861  
Midland, TX 79702

Texaco, Inc.  
P.O. Box 728  
Hobbs, NM 88240

Union Texas Petroleum Corp.  
1300 Wilco Building  
Midland, TX 79701

U-F Petroleum Inc.  
One Marienfeld Place, Suite 580  
Midland, TX 79701

APPLICATION FOR CLASSIFICATION AS HARDSHIP GAS WELL

Operator Alpha Twenty-One Production Company Contact Party Michael D. Oney  
Address P.O. Box 1206 Jal, New Mexico 88252 Phone No. 505-395-3056  
Lease Justis BC Federal Com Well No. 2 UT H Sec. 11 TWP 25 South RGE 37 East  
Pool Name Justis Glorieta Minimum Rate Requested 250 MCFPD  
Transporter Name El Paso Natural Gas Company Purchaser (if different) \_\_\_\_\_

Are you seeking emergency "hardship" classification for this well? X yes \_\_\_\_\_ no

Applicant must provide the following information to support his contention that the subject well qualifies as a hardship gas well.

Provide a statement of the problem that leads the applicant to believe that "underground waste" will occur if the subject well is shut-in or is curtailed below its ability to produce. (The definition of underground waste is shown on the reverse side of this form)

2) Document that you as applicant have done all you reasonably and economically can do to eliminate or prevent the problem(s) leading to this application.

- a) Well history. Explain fully all attempts made to rectify the problem. If no attempts have been made, explain reasons for failure to do so.
- b) Mechanical condition of the well (provide wellbore sketch). Explain fully mechanical attempts to rectify the problem, including but not limited to:
  - i) the use of "smallbore" tubing; ii) other de-watering devices, such as plunger lift, rod pumping units, etc.

Present historical data which demonstrates conditions that can lead to waste. Such data should include:

- a) Permanent loss of productivity after shut-in periods (i.e., formation damage).
  - b) Frequency of swabbing required after the well is shut-in or curtailed.
  - c) Length of time swabbing is required to return well to production after being shut-in.
  - d) Actual cost figures showing inability to continue operations without special relief
- 4) If failure to obtain a hardship gas well classification would result in premature abandonment, calculate the quantity of gas reserves which would be lost
- 5) Show the minimum sustainable producing rate of the subject well. This rate can be determined by:
- a) Minimum flow or "log off" test; and/or
  - b) Documentation of well production history (producing rates and pressures, as well as gas/water ratio, both before and after shut-in periods due to the well dying, and other appropriate production data).
- 6) Attach a plat and/or map showing the proration unit dedicated to the well and the ownership of all offsetting acreage.
- 7) Submit any other appropriate data which will support the need for a hardship classification.
- 8) If the well is in a prorated pool, please show its current under- or over-produced status.
- 9) Attach a signed statement certifying that all information submitted with this application is true and correct to the best of your knowledge; that one copy of the application has been submitted to the appropriate Division district office (give the name) and that notice of the application has been given to the transporter/purchaser and all offset operators.

GENERAL INFORMATION APPLICABLE TO HARDSHIP GAS WELL CLASSIFICATION

1) Definition of Underground Waste.

"Underground Waste as those words are generally understood in the oil and gas business, and in any event to embrace the inefficient, excessive, or improper use or dissipation of the reservoir energy, including gas energy and water drive, of any pool, and the locating, spacing, drilling, equipping, operating, or producing, of any well or wells in a manner to reduce or tend to reduce the total quantity of crude petroleum oil or natural gas ultimately recovered from any pool, and the use of inefficient underground storage of natural gas."

- 2) The only acceptable basis for obtaining a "hardship" classification is prevention of waste with the burden of proof solely on the applicant. The applicant must not only prove waste will occur without the "hardship" classification, but also that he has acted in a responsible and prudent manner to minimize or eliminate the problem prior to requesting this special consideration. If the subject well is classified as a "hardship" well, it will be permitted to produce at a specified minimum sustainable rate without being subject to shut-in by the purchaser due to low demand. The Division can rescind approval at any time without notice and require the operator to show cause why the classification should not be permanently rescinded if abuse of this special classification becomes apparent.
- 3) The minimum rate will be the minimum sustainable rate at which the well will flow. If data from historical production is insufficient to support this rate (in the opinion of the Director), or if an offset operator or purchaser objects to the requested rate, a minimum flow ("log off") test may be required. The operator may, if he desires, conduct the minimum flow test, and submit this information with his application.
- 4) If a minimum flow test is to be run, either at the operator's option or at the request of the Division, the offset operators, any protesting party, the purchaser and OCD will be notified of the date of the test and given the opportunity to witness, if they so desire.
- 5) Any interested party may review the data submitted at either the Santa Fe office or the appropriate OCD District Office.
- 6) The Director can approve uncontested applications administratively if, in his opinion, sufficient justification is furnished. Notice shall be given of intent to approve by attaching such notice to the regular examiner's hearing docket. Within 20 days following the date of such hearing, the affected parties will be permitted to file an objection. If no objection has been filed, the application may be approved.
- 7) Should a protest be filed in writing, the applicant will be permitted to either withdraw the application, or request it to be set for hearing.
- 8) An emergency approval, on a temporary basis for a period not to exceed 90 days, may be granted by the District Supervisor, pending filing of formal application and final action of the OCD Director. This temporary approval may be granted only if the District Supervisor is convinced waste will occur without immediate relief. If granted, the District Supervisor will notify the purchaser.
- 9) After a well receives a "hardship" classification, it will be retained for a period of one year unless rescinded sooner by the Division. The applicant will be required to certify annually that conditions have not changed substantially in order to continue to retain this classification.
- 10) Nothing here withstanding, the Division may, on its own motion, require any and all operators to show cause why approval(s) should not be rescinded if abuse is suspected or market conditions substantially change in the State of New Mexico.
- 11) A well classified as a "hardship well" will continue to accumulate over and under production (prorated pools). Should allowables exceed the hardship allowable assigned, the well will be permitted to produce at the higher rate, if capable of doing so, and would be treated as any other non-hardship well. Any cumulative overproduction accrued either before or after being classified "hardship" must, however, be balanced before the well can be allowed to produce at the higher rate.

<p> <b>AMERADA (OPER.)</b>          Tr. 12          Tr. 13          Tr. 14          Tr. 15          Tr. 16          Tr. 17          Tr. 18          Tr. 19          Tr. 20          Tr. 21          Tr. 22          Tr. 23          Tr. 24          Tr. 25          Tr. 26          Tr. 27          Tr. 28          Tr. 29          Tr. 30          Tr. 31          Tr. 32          Tr. 33          Tr. 34          Tr. 35          Tr. 36          Tr. 37          Tr. 38          Tr. 39          Tr. 40          Tr. 41          Tr. 42          Tr. 43          Tr. 44          Tr. 45          Tr. 46          Tr. 47          Tr. 48          Tr. 49          Tr. 50          Tr. 51          Tr. 52          Tr. 53          Tr. 54          Tr. 55          Tr. 56          Tr. 57          Tr. 58          Tr. 59          Tr. 60          Tr. 61          Tr. 62          Tr. 63          Tr. 64          Tr. 65          Tr. 66          Tr. 67          Tr. 68          Tr. 69          Tr. 70          Tr. 71          Tr. 72          Tr. 73          Tr. 74          Tr. 75          Tr. 76          Tr. 77          Tr. 78          Tr. 79          Tr. 80          Tr. 81          Tr. 82          Tr. 83          Tr. 84          Tr. 85          Tr. 86          Tr. 87          Tr. 88          Tr. 89          Tr. 90          Tr. 91          Tr. 92          Tr. 93          Tr. 94          Tr. 95          Tr. 96          Tr. 97          Tr. 98          Tr. 99          Tr. 100          Tr. 101          Tr. 102          Tr. 103          Tr. 104          Tr. 105          Tr. 106          Tr. 107          Tr. 108          Tr. 109          Tr. 110          Tr. 111          Tr. 112          Tr. 113          Tr. 114          Tr. 115          Tr. 116          Tr. 117          Tr. 118          Tr. 119          Tr. 120          Tr. 121          Tr. 122          Tr. 123          Tr. 124          Tr. 125          Tr. 126          Tr. 127          Tr. 128          Tr. 129          Tr. 130          Tr. 131          Tr. 132      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Tr. 368          Tr. 369          Tr. 370          Tr. 371          Tr. 372          Tr. 373          Tr. 374          Tr. 375          Tr. 376          Tr. 377          Tr. 378          Tr. 379          Tr. 380          Tr. 381          Tr. 382          Tr. 383          Tr. 384          Tr. 385          Tr. 386          Tr. 387          Tr. 388          Tr. 389          Tr. 390          Tr. 391          Tr. 392          Tr. 393          Tr. 394          Tr. 395          Tr. 396          Tr. 397          Tr. 398          Tr. 399          Tr. 400          Tr. 401          Tr. 402          Tr. 403          Tr. 404          Tr. 405          Tr. 406          Tr. 407          Tr. 408          Tr. 409          Tr. 410          Tr. 411          Tr. 412          Tr. 413          Tr. 414          Tr. 415          Tr. 416          Tr. 417          Tr. 418          Tr. 419          Tr. 420          Tr. 421          Tr. 422          Tr. 423          Tr. 424          Tr. 425          Tr. 426          Tr. 4</p>
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NEW MEXICO OIL CONSERVATION COMMISSION  
WELL LOCATION AND ACREAGE DEDICATION AT

Form No. 1  
Superseded G-123  
Effective 1-1-65

All distances must be from the outer boundaries of the Section

Alpha 21 Production Co.			Justis BC Federal Com		Well No. 2
Quarter H	Section 11	Township 25 South	Range 37 East	County Lea	
Location of Well:					
1980		feet from the North	line and 990	feet from the East	line
Well Level Elev 3152.6	Producing Formation Glorieta		Pool Justis Glorieta		Estimated Acreage 320

1. Outline the acreage dedicated to the subject well by colored pencil or hatchure marks on the plat below.
2. If more than one lease is dedicated to the well, outline each and identify the ownership thereof (both as to working interest and royalty).
3. If more than one lease of different ownership is dedicated to the well, have the interests of all owners been consolidated by communitization, unitization, force-pooling, etc?

☒ Yes ☐ No If answer is "yes," type of consolidation Communitization

If answer is "no," list the owners and tract descriptions which have actually been consolidated. (Use reverse side of this form if necessary.)

No allowable will be assigned to the well until all interests have been consolidated (by communitization, unitization, forced-pooling, or otherwise) or until a non-standard unit, eliminating such interests, has been approved by the Commission.

NE/4	Alpha Twenty-One Production Co 100% W. I. (Gas Rights) United States of America 12½% R. I.
SE/4	El Paso Natural Gas Company 100% W. I. (Gas Rights) United States of America 12½% R. I.

Justis Federal No. 1

CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.

*[Signature]*  
Name Tommy Phipps  
Position Executive Vice President  
Company Alpha Twenty-One Production Co.  
Date February 18, 1981

I have carefully examined the plat shown on this page and attested that the same is a true and correct copy of the original survey made by me or under my supervision, and that the same is true and correct to the best of my knowledge and belief.

*[Signature]*  
Name  
Position  
Company

Justis Federal No. 1

JOHN W. 4237 473  
PATRICK A. 40340 4383  
RICHARD E. 4212

ILLEGIBLE

ALPHA TWENTY-ONE PRODUCTION COMPANY

Justis BC Federal Com #2

1980' FNL-990' FEL

Section 11, T25S, R37E

Lea County, New Mexico

8-5/8" casing set at 432'. Cemented with 300 sacks of Class 'C' cement. Circulated 90 sacks.

5-1/2" casing set at 4998'. Cemented with 775 sacks Halliburton Lite and 575 sacks of 50/50 Pozmix. Circulated 260 sacks.

2-3/8" tubing set at 4858'.

Perforations at 4684'-4830'.

TD at 5000'.



## ALPHA TWENTY-ONE PRODUCTION COMPANY

POST OFFICE BOX 1206  
JAL, NEW MEXICO 88252

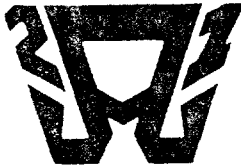
505/395-3056

June 21, 1984

I, Michael D. Oney, certify that all foregoing information submitted with the Application for Classification as Hardship Gas Well on the Justis "BC" Federal Com No. 2, Section 25, T-11-S, R-37-E, Lea County, New Mexico is true and correct to the best of my knowledge and further attest that one copy of the Application has been submitted to the appropriate Division district office (Oil Conservation Division, P.O. Box 1980, Hobbs, NM 88240), and that notice of this application has been given to the transporter/purchaser (El Paso Natural Gas Company, P.O. Box 1492, El Paso, Texas 79978), and that notice of this application has been given to all offset operators.

Michael D. Oney, Drilling Superintendent





## ALPHA TWENTY-ONE PRODUCTION COMPANY

POST OFFICE BOX 1206  
JAIL NEW MEXICO 88252

505/395-3056

June 12, 1984

Apollo Oil Company  
P.O. Box 1737  
Hobbs, NM 88240

RE: Justis "BC" Federal Com No. 1, Sec. 25, T-11-S, R-37-E, Lea County, New Mexico  
Gentlemen:

As an offset operator, please be informed that we are applying for a Hardship Gas Well Classification for the above referenced well.

Enclosed for your review and records, please find one copy each of the Application for Classification as a Hardship Gas Well and an ownership map showing the proration unit dedication and ownership of all offsetting acreage.

If you have any questions concerning this application, please direct them to the Oil Conservation Division of New Mexico in Santa Fe, New Mexico

Sincerely,

*Michael D. Oney*  
Michael D. Oney,  
Drilling Superintendent

MDO/tic  
Enclosures

cc: Arco Oil & Gas Company  
P.O. Box 1710  
Hobbs, NM 88240

Cities Services Oil & Gas Corp.  
P.O. Box 1919  
Midland, TX 79702

Conoco, Inc.  
P.O. Box 460  
Hobbs, NM 88240

Exxon Corporation  
P.O. Box 1600  
Midland, TX 79701

Gulf Oil corporation  
P.O. Box 670  
Hobbs, NM 88240

Doyle Hartman  
508 C & K Petroleum Building  
Midland, TX 79701

Mobil Producing Tex & NM Inc.  
9 Greenway Plaza, Suite 2700  
Houston, TX 77046

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U-F Petroleum Inc.  
One Marienfeld Place, Suite 580  
Midland, TX 79701

Alpha Twenty-One Production Company  
2100 First National Bank Building  
Midland, TX 79701  
ATTN: Mr. Tom Phipps

ALPHA TWENTY-ONE PRODUCTION COMPANY  
 Tabulation of Production  
 Justis BC Federal Com #2  
 NM 4355  
 Justis Glorieta  
 Lea County, New Mexico

	<u>Gas</u> <u>MCF</u>	<u>Annual</u> <u>Cumulative</u>	<u>Total</u> <u>Cumulative</u>	<u>Oil</u> <u>Bbls</u>	<u>Annual</u> <u>Cumulative</u>	<u>Total</u> <u>Cumulative</u>
<u>1981</u>						
1st.						
<del>8-28-81-</del>						
9-1-81	1,746	1,746	1,746			
October	16,512	18,258	18,258			
November	13,956	32,214	32,214			
December	11,154	43,368	43,368			
<u>1982</u>						
January	9,999	9,999	53,367			
February	1,375	11,374	54,742			
March	9,288	20,662	64,030			
April	11,043	31,705	75,073			
May	9,436	41,141	84,509			
June	7,410	48,551	91,919			
July	8,847	57,398	100,766			
August	8,443	65,841	109,209			
September	8,005	73,846	117,214			
October	8,128	81,974	125,342	65	65	65
November	7,331	89,305	132,673	70	135	135
December	7,654	96,959	140,327	24	159	159
<u>1983</u>						
January	5,975	5,975	146,302	45	45	204
February	7,131	13,106	153,433	19	64	223
March	7,160	20,266	160,593	10	74	233
April	6,552	26,818	167,145	23	97	256
May	6,217	33,035	173,362	17	114	273
June	5,908	38,943	179,270	16	130	289
July	5,485	44,428	184,755	14	144	303
August	5,230	49,658	189,985	15	159	318
September	4,570	54,228	194,555	17	176	335
October	6,657	60,885	201,212	22	198	357
November	11,711	72,596	212,923	102	300	459
December	10,494	83,090	223,417	70	370	529
<u>1984</u>						
January	10,533	10,533	233,950	27	27	556
February	8,663	19,196	242,613	31	58	618
March	8,923	28,119	251,536	27	85	699
April	8,162	36,281	259,698	26	111	810