

Additional Information

PVACD Protest
(Items of Concern)

Mack Glacier
SWD-2617

Jan 16 ,2025



HENNIGHAUSEN OLSEN & McCREA

LLP

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October 4, 2024

Via Federal Express

OIL CONSERVATION DIVISION

1220 South St. Francis Drive
Santa Fe, NM 87505

**Re: *Objection to Application for SWD;
Mack Energy Corporation,
Glacier SWD #1, API 30-015-31436***

To Whom it May Concern:

This firm represents the Pecos Valley Artesian Conservancy District ("PVACD"), and more specifically, relating to the Application by Mack Energy Corporation for a Salt Water Disposal Well, as received by PVACD, an interest holder, on September 19, 2024.

The Applicant proposes to drill Glacier SWD #1, (30-015-31436) as an injection well located at 1979 FSL and 1981 FWL, Section 32, Township 16 South, Range 27 East, Eddy County, New Mexico.

The PVACD is a quasi-governmental agency and an artesian conservancy district created pursuant to state law. This letter will serve as formal objection to the granting of the application on the basis that granting such application would contaminate the underground sources of drinking water of the people of the State of New Mexico. This letter will also serve as a request for hearing on the application.

You are requested to deny the application and send all notices and written materials regarding this matter to this firm.

Sincerely yours,

HENNIGHAUSEN OLSEN & McCREA LLP



Robert J. McCrea

A.J. OLSEN
Of Counsel

ROBERT J. McCREA
Certified Public Accountant

MITCHELL E. McCREA
Special Counsel
Licensed in Texas & New Mexico

FRED R. HENNIGHAUSEN
1924-2017

ALVIN F. JONES
1944-2019

From: [Olivia R. M. Standish](#)
To: [Goetze, Phillip, EMNRD](#); [Aron Balok](#); [Wrinkle, Justin, EMNRD](#); [Moander, Chris, EMNRD](#); [Bob McCrea](#); [Malina Kauai](#)
Subject: [EXTERNAL] Glacier SWD No. 1 - Mack Energy Corporation; Items of Concern for Today's Discussion
Date: Thursday, January 16, 2025 8:07:48 AM
Attachments: [2025-01-16 PVACD Concerns for Discussion.pdf](#)

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

All,

Thank you for your flexibility in rescheduling our meeting to today. I am also sending a summary of the items PVACD would like to discuss, based upon our experts review of the proposed permit that was provided last month.

Looking forward to our discussion,
-Olivia

[Olivia R. M. Standish](#)



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PVACD Concerns for Discussion on January 16, 2025**Compliance with Special Rule for the Roswell Basin:**

- 19.15.39.A(2) NMAC which applies to all of T16S, R27E and all well drilling
- Surface casing must be set 50 ft below the bottom of the artesian aquifer.
- Determination of whether an "artesian aquifer" exists at this location is necessary.
 - Concerns regarding stratigraphic interval equivalent to the artesian aquifer is beyond the area where the high-transmissivity aquifer has developed

Casing Details:

- The existing 8-5/8-in. casing is set slightly below the top of the San Andres Limestone and may not fully cover the artesian aquifer interval.
 - Verify the exact position of the casing shoe at 1,381 ft (elev. 2,011) relative to formation tops.
 - Welder's map (fig. 3) has the top of the San Andres at about elev. 2,150
 - The OCD file for the original well has a list of formation tops that puts the top of the San Andres at 1,220 ft (elev. 2,172)
- Cross-sections suggest the artesian aquifer interval may include the upper San Andres at this location.
 - Welder's cross-sections (fig. 4c and 4d) indicate that the artesian aquifer is mostly in the Grayburg, above the San Andres, to the south of the proposed well, but includes the upper part of the San Andres to the north of the well. The artesian aquifer interval may be partly in the upper San Andres in the well.
 - PVACD's experts were unable to find any sample description or geophysical logs for the upper 1,381 ft in the OCD records to help with this question

Verification of Cement Coverage:

- Bond logs for both the 8-5/8-in. and 5-1/2-in. casing strings are needed to confirm adequate cement coverage and bonding.
 - If the cemented 8-5/8-in. casing does not quite cover the artesian aquifer interval, there would be only the cemented 5-1/2-in. casing to fully protect the zone.
- Determine if cement circulated to the surface after setting the 8-5/8-in. and 5-1/2-in. casing strings.

Mechanical Integrity Testing:

- Perform a mechanical integrity test (MIT) before injection.
- Stop injection immediately if injection pressure decreases and perform an MIT.

Plugging and Abandonment:

- Plug the well with cement from total depth to the ground surface due to the karst nature of the formations.
- Avoid using heavy fluid for plugging.

Additional Data and Documentation:

- Identify whether there are sample descriptions or geophysical logs for the upper 1,381 ft to clarify the extent of the artesian aquifer interval.

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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 441848

CONDITIONS

Operator: MACK ENERGY CORP P.O. Box 960 Artesia, NM 882110960	OGRID: 13837
	Action Number: 441848
	Action Type: [IM-SD] Admin Order Support Doc (ENG) (IM-AAO)

CONDITIONS

Created By	Condition	Condition Date
anthony.harris	None	3/12/2025