

From: [Kevin Jones](#)
To: [Goetze, Phillip, EMNRD](#)
Subject: [EXTERNAL] Re: BTA Oil Producers - Vacuum SWD H#35 - 30-025-20207
Date: Monday, April 7, 2025 1:59:13 PM
Attachments: [image001.png](#)

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We will get this done ASAP, thank you for your help.

Kevin

From: Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>
Sent: Monday, April 7, 2025 2:42 PM
To: Kevin Jones <kjones@btaoil.com>
Cc: Chavez, Carl, EMNRD <Carlj.Chavez@emnrd.nm.gov>; Gebremichael, Million, EMNRD <Million.Gebremichael@emnrd.nm.gov>; Sandoval, Stacy, EMNRD <Stacy.Sandoval@emnrd.nm.gov>; Harris, Anthony, EMNRD <Anthony.Harris@emnrd.nm.gov>; Cordero, Gilbert, EMNRD <Gilbert.Cordero@emnrd.nm.gov>
Subject: BTA Oil Producers - Vacuum SWD H#35 - 30-025-20207

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RE: Vacuum SWD H Well No. 35 (API 30-025-20207); UIC permit SWD-109

Having reviewed the well file and the disposal record. My findings:

- Approved under administrative order SWD-109 on November 14, 1969, for the San Andres and Paddock formations from 5230 feet to 6995 feet with injection through 3.5-inch tubing.
- Prior Commission Order R-3239 (June 1, 1967) permitted the well for disposal [through the annulus of the tubing/production casing] in the Paddock formation from 6955 feet to 6995 feet while continuing production from the Abo through the tubing set in a packer at 8743 feet. Though approved, this well designed was never initiated.
- Both C-108 applications for the well (for the hearing and admin order) describes the well operation as gravity injection or under vacuum. This observation on injection was based on area wells at the time of the application.
- This well was originally part of produced water disposal system established by Rice Operating as part of the Vacuum Salt Water Disposal System (closed in 2004) for the Vacuum production fields to the west and southwest.

The well operates under the authority of SWD-109 (due to the completion and current

construction) which pre-dates the primacy agreement which the EPA approved as the OCD's UIC program for Class II wells. This well's order (UIC permit) was grandfathered into the UIC program with EPA's approval. Though SWD-109 does not provide a limiting pressure in its content, the well is limited to a maximum surface injection pressure (MSIP) of 1,046 psi (0.2 psi/ft X 5230 ft [depth to upper perforations in feet]). My recommendation to BTA is to submit C-103Z reporting that the well requires a pump and that the well injection system has a pressure limiting device to keep the surface injection below the MSIP of 1,046 psi. Additionally, the maximum pressure, observed during a month period, needs to be reported along with days of operation and volume injected in the C-115. Otherwise, as long as the well has mechanical integrity and operates below the administratively approved MSIP, the current SWD order is sufficient to maintain injection authority. Please contact me with any questions in this matter. PRG

From: Kevin Jones <kjones@btaoil.com>

Sent: Thursday, April 3, 2025 10:02 AM

To: Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>; Chavez, Carl, EMNRD <Carlj.Chavez@emnrd.nm.gov>

Subject: [EXTERNAL] BTA Oil Producers - Vacuum SWD H#35 - 30-025-20207

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Mr. Goetze and Chavez,

In a recent internal review of the NMOCD admin orders for the Vacuum H#35 SWD well, we noticed on the C-108 filed on this well shows the well to be injection by gravity. This is no longer the case as the well currently has a disposal pump set up to inject via pressure. The only orders we could find are the C-108's on the NMOCD website from 1969. I was not sure if there was an additional C-108 or different form filed that was not on the website that would act as admin orders?

If you could give me some guidance on what needs to be done to stay in compliance, we would be greatly appreciative.

Thank You,

Kevin Jones



Production Superintendent

432-664-5452 cell.
432-682-3753 office.

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/oed/contact-us>

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

CONDITIONS

Action 449357

CONDITIONS

Operator: NEW MEXICO ENERGY MINERALS & NATURAL RESOURCE 1220 S St Francis Dr Santa Fe , NM 87504	OGRID: 264235
	Action Number: 449357
	Action Type: [IM-SD] Admin Order Support Doc (ENG) (IM-AAO)

CONDITIONS

Created By	Condition	Condition Date
pgoetze	None	4/7/2025