Susana Martinez Governor

David Martin Cabinet Secretary-Designate

Brett F. Woods, Ph.D. Deputy Cabinet Secretary Jami Bailey, Division Director Oil Conservation Division



February 4, 2014

Ms. Jana Spraberry PPC Operating Company LLC 1500 Industrial, Suite 102 Abilene, Texas 79603

RE: Packer Setting Depth Exception

Injection Authority: Order No. R-4521(as amended by R-9848); Rhodes Yates UnitWaterflood ProjectPool: Rhodes; Yates-Seven RiversRhodes Yates Unit Well No. 10API 30-025-12058(Identified as the Morris Well No. 2 in Order R-4521)Unit L, Sec 27, T26S, R37E, NMPM, Lea County, New Mexico

Ms. Spraberry:

Reference is made to your request on behalf of PPC Operating Company (OGRID 288774; the "operator") received by the Division on January 10, 2014, for the above named well. The operator applied for exception for setting the packer within 100 feet of the top of the approved injection interval.

It is our understanding that mechanical integrity testing conducted on this well following the replacement of tubing and packer system was only successful with the packer set at a depth of 2963 feet. This location of the packer is approximately 159 feet above the top of the perforated injection interval that begins at 3112 feet. The approved injection interval is from 3112 feet to 3327 feet.

For the reasons stated in the application and because it appears that correlative rights are protected, waste will not occur and this modification will not endanger any fresh water aquifer or the environment, the exception is granted. The packer location within this well shall not be set higher than 159 feet unless the operator receives written approval from the Division Director.

Packer Setting Depth Exception PPC Operating Co. LLC February 4, 2014 Page 2 of 2

The Division Director may rescind this exception if it becomes apparent that the injected fluid is not being confined to the permitted interval or is endangering any fresh water aquifer.

Sincerely,

JAMT BAILEY Director

JB/prg

cc: Oil Conservation Division – Hobbs Office Case File 4936 Well File API 30-025-12058



January 10, 2014

New Mexico Oil Conservation District Attn: Phillip Goetze 1220 South St. Francis Dr. Santa Fe, NM 87505

RE: Well API #30-025-12058-0000 Rhodes Yates Unit Well No. 010 Rhodes; Yates-Seven Rivers Pool Lea County, NM

We have worked on this injection well this week, replacing the tubing and packer. During workover operations, the packer was found to be at 2,963 feet which is 159 feet above the top perforation of 3,122 feet. Our field foreman reset the packer where he found it at 2,963. Unfortunately, the paperwork filed by the previous operator, shows the packer set at 3,063 feet. A mechanical integrity test was run on the well 1/10/2014 and witnessed by Mark Whitaker of the NMOCD Hobbs office. The well held a steady pressure for 30 minutes.

We are requesting permission to leave the packer at 2,963 feet rather than have to rig back up on the well and reset it.

Please advise if you have any questions or need any other information. You can reach me at 325-267-6046 or ispraberry@plantationpetro.com.

Sincerely,

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Jana Spraberry Office Administrator PPC Operating Company LLC

-2-Case No. 4936 Order No. R-4521

IT IS THEREFORE ORDERED:

(1) That the applicant, Texaco Inc., is hereby authorized to institute a waterflood project in the Rhodes Yates Unit Area, Rhodes-Yates Pool, by the injection of water into the Yates-Seven Rivers formations through the following-described seven wells in Township 26 South, Range 37 East, NMPM, Lea County, New Mexico:

	LEASE WELL N								
Rhodes Vates Unit#5	State "JD" Unit	2	660'	FNL and	660'	FWL,	Sec.	27 30 - 025-	120720
Rhodes Vates UNC# J Rhodes Vates Unit# 7	State "JD" Unit	4	650'	FNL and	2310'	FWL,	Sec.	27 20 - 025 -	12063
Rhedes recesure	N.M. "AD" State	1	660'	FNL and	1980'	FWL,	Sec.	28-	
	Morris		<u>1980'</u>	FNL and					e
	State "A" 28		1980	FSL and FNL and	660'				-A
	H.G. Moberly "C"	3	660'	FSL and	660'	FEL,	Sec.	21) - P	G
	(NCT-2)					-			

(2) That injection into each of said wells shall be through internally plastic-coated tubing set in a packer which shall be located as near as is practicable to the uppermost perforation, or in the case of open-hole completions, as near as is practicable to the casing-shoe; that the casing-tubing annulus of each injection well shall be loaded with an inert fluid and equipped with a pressure gauge at the surface.

10 120 58 Unit # 10 30-025-12058 100 FUL 2130 FSL 660 FUL (3) That the subject waterflood project is hereby designated the Texaco Rhodes-Yates Waterflood Project and shall be governed by the provisions of Rules 701, 702, and 703 of the Commission Rules and Regulations.

(4) That monthly progress reports of the waterflood project herein authorized shall be submitted to the Commission in accordance with Rules 704 and 1120 of the Commission Rules and Regulations.

(5) That jurisdiction of this cause is retained for the entry of such further orders as the Commission may deem necessary.

DONE at Santa Fe, New Mexico, on the day and year hereinabove designated.

STATE OF NEW MEXICO OIL CONSERVATION COMMISSION TRUJILLO Chairman Member Jr., Member'& Secretary

SEAL

dr/

Entered May 17, 1913

BEFORE THE OIL CONSERVATION COMMISSION OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION COMMISSION OF NEW MEXICO FOR THE PURPOSE OF CONSIDERING:

> CASE NO. 4936 Order No. R-4521

APPLICATION OF TEXACO INC. FOR A WATERFLOOD PROJECT, LEA COUNTY, NEW MEXICO.

ORDER OF THE COMMISSION

BY THE COMMISSION:

This cause came on for hearing at 9 a.m. on April 11, 1973, at Santa Fe, New Mexico, before Examiner Elvis A. Utz.

NOW, on this <u>17th</u> day of May, 1973, the Commission, a quorum being present, having considered the testimony, the record, and the recommendations of the Examiner, and being fully advised in the premises,

FINDS:

(1) That due public notice having been given as required by law, the Commission has jurisdiction of this cause and the subject matter thereof.

(2) That the applicant, Texaco Inc., seeks authority to institute a waterflood project in the Rhodes Yates Unit Area, Rhodes-Yates Pool, by the injection of water into the Yates-Seven Rivers formations through seven injection wells in Sections 21, 27 and 28, Township 26 South, Range 37 East, NMPM, Lea County, New Mexico.

(3) That the wells in the project area are in an advanced state of depletion and should properly be classified as "stripper" wells.

(4) That the proposed waterflood project should result in the recovery of otherwise unrecoverable oil, thereby preventing waste.

(5) That the subject application should be approved and the project should be governed by the provisions of Rules 701, 702, and 703 of the Commission Rules and Regulations.

FROM C-10B Jar R-9848 PO-108

INJECTION WELL DATA SHEET

OPERATOR: Texaco Exploration & Production Inc. WELL: Rhodes Yates Unit #10 WIW FOOTAGE LOCATION: 2310 FSL, 660 FWL Sec./Twn/Rng: Unit L, Section 27, T-26-S, R-37-E Additional pay will be added to Middle Yates. DF = 2996' Lea County, New Mexico TABULAR DATA SCHEMATIC Surface Casing: Set at: 595 ' Size 8 5/8, 28# Cemented with 175 sx. 2987' GL Gr 595' TOC surface ' determined by circulated_ 8 5/8", 28#, H-40, 175 sx, cem circ. Hole Size NR Comp. Date 4-26-43 Intermediate casing: Set at: _____' Size none Cemented with _____sx. TOC _____ ' determined by _____ Hole Size 3100' Gibrsn Uni-VI Packer 5 1/2", 15#, H-40, 3158' 650 sx, cem circ. Production Casing: Set at: 3158 ' TD - Open Hole 3327' Size 5 1/2", 15# Cemented with 650 sx. 3287 - 3307 Shot w/ 100 gts TOC _____surface ' determined by _____irelated 20/40 Resin-Coated 3260'-TD Sand Pack Hole Size 7 7/8' Estimated Tops: Injection Interval: Salt 1400'- 2870' Yates 3008' Oil Pay 3122 ' to 3327 ' through: Open Hole 3287' ** Additional perfs from 3122'-3153' Tubing: 2 3/8", 4.7#, J-55, ICC, 2000# WP