

From: Jones, William V, EMNRD
Sent: Monday, March 23, 2015 7:13 PM
To: 'stan_wagner@eogresources.com'
Cc: Goetze, Phillip, EMNRD; Sanchez, Daniel J., EMNRD; Dade, Randy, EMNRD; 'efernand@blm.gov'; Wade, Gabriel, EMNRD
Subject: EOG SWD application for the Ramblin Rose 14 Federal SWD Well No. 1 30-015-41796 Bell Canyon and Cherry Canyon Perforations
Attachments: NoticeExample_CiscoCanyon_MapView.pdf; NoticeExample_MapView_EddyNM_NASH_53_SWD.pdf

Hello Stan,
Hope all is well today.

I just reviewed your SWD application for this well.

Apparently it is still a decently producing vertical Bone Spring well with little water production after a large completion and treatment – so I can't release an SWD permit at this time. You didn't include any data from your oil field accounting as to costs for this well or economic limit calculations – and it is not clear that the OCD is free to allow conversion of producing wells into SWD wells, even with this economic limit calculation. Also the lower Cherry Canyon and the Brushy Canyon were decent producers for a while on a Yates/Lime Rock well just over ½ mile to the West of this location – so this well may have a bail out production interval that should be tried prior to being used for SWD.

It takes time for you to send us information and also time for us to evaluate. So I should mention other issues that I would ask about if this permit were going forward:

- a. The top proposed perf is at 4050 feet which is above the Lamar LS – probably would want to get more explanation of this or we should just lower the top perf to the Bell Canyon at 4135 feet.
- b. There are still no logs in our imaging system even though the application says they were sent to the OCD.
- c. I don't think the proposed interval is productive, but to cover the bases, would need to get a mudlog or elog analysis over this proposed interval, probably from an offsetting Bone Spring horizontal well – or from logs run on this well.
- d. The noticed parties (Devon and BLM) may be all that are affected, but Lime Rock did take over the Yates well in Section 15 prior to plugging and may still have mineral interests? We do ask that the applicant for SWD talk to the Landman in your company and identify all separately owned tracts within the proposed disposal interval within ½ mile of this well – a map such as the ones attached does that.
- e. And our attorneys say that the newspaper notices should always include a layman's description of the location of the well – such as "10 miles NE of Red Bluff reservoir".

Regards,
Will Jones



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