Jones, William V, EMNRD

From: Jones, William V, EMNRD

Sent: Tuesday, September 01, 2015 3:33 PM

To: 'Maunder, Susan B'

Cc: Goetze, Phillip, EMNRD; McMillan, Michael, EMNRD; Dade, Randy, EMNRD; Inge,

Richard, EMNRD; Edward Fernandez; Holm, Anchor E.

Subject: Application from ConocoPhillipsCo for expansion of the James A State Pressure

Maintenance Project: James A #10 30-015-26314 Cherry/Brushy

Hello Susan,

Please add this to any previous correspondence you may have on this proposed injection well.

The [well done] application states this well would be a PMX/SWD addition in order to add pressure and dispose of project waters.

This would be the third injection well in that Section 2. Those wells seem to be capable of 1500 to 2000 barrels per day of injection.

I see the reported water production from this project varies from 1100 to 4600 – no project plot of production/injection was included with the application.

Portions of Section 2 were permitted as a Pressure Maintenance Project by R-9500 on May 6, 1991 with injection from 5600 to 7400 feet into the Cherry and Brushy Canyon members.

This is inside the Potash Area – and I see you sent notice to Mosaic, BLM, SLO, and others, but don't have the green cards or mailers in my packet.

We also have no logs for this well in the OCD files – please send copies of all logs you have on this well including Temp Surveys and CBL's to our District Office for scanning.

This area is about 2 miles northwest of the WIPP site.

The Delaware in this area seems to extend from 3634 to 7440 feet and is overlain by the Salado or other evaporates and underlain by the Bone Spring.

The biggest issue I see is you are asking to extend the injection interval up hole from that permitted in R-9500 and therefore it extends up into an unprotected bradenhead [annulus] on an offsetting well in Unit letter O (30-015-10806). That well has a cement top reported at 4865 feet and is still an active producer from a lower formation.

Your requested interval is 4440 to 7300 feet gross with immediate perfs from 4705 to 7273 feet.

I regret to say, we can't approve this one because of the unprotected offsetting bradenhead.

Due partially to proximity to WIPP/Potash/Bone Spring, prior to approval of another injection well (or this one with an adjusted depth interval), we may need an update on this project (probably at hearing) including pressures, injection/withdrawals, response of producers, and effect on the reservoir to the south of this project.

Regards,



William V. Jones, P.E., Engineer and District IV Supervisor
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