Susana Martinez Governor

David Martin Cabinet Secretary

Tony Delfin Deputy Cabinet Secretary David R. Catanach, Division Director Oil Conservation Division



May 6, 2016

Mr. Eddie Seay, agent MNA Enterprises LTD Co. 601 W. Illinois Hobbs, NM 88242 575-392-2236

RE: Administrative Order SWD-471; Commercial Disposal

Russell Federal 35 SWD Well No. 2 (API 30-015-05891) Unit A, Sec 35, T26S, R31E, NMPM, Eddy County, New Mexico Order Date: April 8, 1992 Disposal into the upper Delaware formation; approved OH interval: 4106 feet to 4118 feet

Dear Mr. Seay:

Reference is made to your letter, received May 6, 2016, on behalf of MNA Enterprises LTD Co. providing notice of your intent to convert this disposal well from lease-only into a commercial disposal well. Your letter asks the Division to consider this action and provide feedback.

This well has been used to re-inject the water produced from surrounding producing wells completed also in the Delaware Mountain Group [Mason; Delaware, North Pool (44859)] and operated by MNA Enterprises LTD Co. It is surrounded on all sides by producers, some of which are still producing oil. Two of these wells seem to have watered out. The conversion to commercial disposal will have either a positive or negative effect on the remaining producing wells. It is our understanding that the BLM has not objected to this.

There are a few items that the Division asks:

- a. Supply the Division with recent verification of the total depth of this well. This should be by wireline or tubing tally witnessed by or approved by the Artesia district office inspectors. Any deepening of this open hole must be approved by the BLM and the Division and also approved by the Santa Fe office after submission of another form C-108.
- b. Provide a contact person for this operator to Denise Gallegos in the Santa Fe office.
- c. Supply the Division with copies of any logs the operator has in its files on this well.
- d. Begin henceforth reporting tubing pressures on the C-115 report for this well.
- e. Verify to the Artesia district inspectors by chart recorder or other approved device that this well always remains below the 821 psi tubing pressure limit.

SWD-471: Conversion to Commercial Disposal Eddie Seay, agent for MNA Enterprises LTD Co. May 6, 2016 Page 2 of 2

All requirements of the above referenced administrative order remain in effect. In addition, without a revised or updated C-108 application, the submissions of the 1992 application remain in full force and effect.

Sincerely,

David R. Catanad

DAVID R. CATANACH Director

DRC/wvjj

cc: Oil Conservation Division – Artesia District Office
Well File API 30-015-05891 and SWD-471
Bureau of Land Management – Carlsbad Field Office

Mr. Patrick McMahon, Esq., Heidel Samberson Cox & McMahon Law Firm 311 North 1st Street, Lovington, NM, 88260 May 2016

RECEIVED 005

NMOCD Engineering ATTN: Will Jones 1220 South St. Francis Drive Santa Fe, NM 87505

RE: MNA Enterprises LTD Co. Russell Federal 35 #2 SWD-471 Convert to Commercial

Mr. Jones:

As required, MNA is giving notice that they plan to convert the above listed well to a "Commercial SWD", a copy of the SWD approval is attached.

MNA has notified BLM, as they required, with a 3160 sundry notice, a copy is attached. The Russell Federal 35 #2 is in compliance with the OCD and BLM rules and regulations.

Please let us know if we need anything further. Your consideration is appreciated.

Thanks,

Eddie Seay Consulting, Agent Eddie W. Seay 601 W. Illinois Hobbs, Nm 88242 575-392-2236 seay04@leaco.net

Cc: Patrick McMahon, MNA Legal David Catanach, Director

Form 3160-5 UNITED STATES			FORM APPROVED OMB No. 1004-0137			
(June 2015) DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT				5. Lease Serial No.	ires: January 31, 2018	
SUNDRY NOTICES AND REPORTS ON WELLS				NMLC 068282 A		
Do not use this form for proposals to drill or to re-enter an abandoned well. Use Form 3160-3 (APD) for such proposals.				6. If Indian, Allottee or Tribe Name		
SUBMIT IN TRIPLICATE - Other instructions on page 2				7. If Unit of CA/Agreement, Name and/or No.		
1. Type of Well		····		P. Wall Name and No.		
Oil Well Gas Well Other SWD 471				8. Well Name and No. Russell 35 Federal #002		
2. Name of Operator MNA Enterprises LTD CO				9. API Well No. 30-015-05891		
3a, Address 106 W. Alabama Stre	lo. (include area coa 2702	le)	10. Field and Pool or Exploratory Area SWD; Delaware			
4. Location of Well (Footage, Sec., T., R.M., or Survey Description)				11. Country or Parish, State		
433' FNL & 660' FEL Section 35 Tws. 26S, Rng 31E				Eddy Co., New Mexico		
12. CI	ECK THE APPROPRIATE BOX(ES) TO I	INDICATE NATURI	E OF NOT	ICE, REPORT OR OTHI	ER DATA	
TYPE OF SUBMISSION			TPE OF AC			
Notice of Intent		eepen ydraulie Fracturing	=	luction (Start/Resume) amation	Water Shut-Off	
		w Construction		mplete	Other	
Subsequent Report		ug and Abandon		porarily Abandon		
Final Abandonment Notice	Convert to Injection	ug Back	Vate	r Disposal		
is ready for final inspection.) Convert SWD 471 to comme 1. Injection will be through 2 2. Inject into Delaware forma 3. Packer set within 100 ft. o 4. MiT will be run when requ 5. File monthly reports as re-	in. tubing. ition 4106'- 4118'. f top perfs. approximately 4005'. ested.		·	ł		
14. I hereby certify that the foregoing	is true and correct. Name (Printed/Typed)					
Eddie W. Seay		Agent Title				
Signature Eddie W Seam		Date	te 04/10/2016			
	THE SPACE FOR FEL	DERAL OR ST	ATE OFI	CE USE	· · · · · · · · · · · · · · · · · · ·	
Approved by			<u> </u>			
		Title		Dat	le	
	ched. Approval of this notice does not warra equitable title to those rights in the subject l nduct operations thereon.			······································		
Fitle 18 U.S.C Section 1001 and Title any false, fictitious or fraudulent stater	43 U.S.C Section 1212, make it a crime for a nents or representations as to any matter with	any person knowingl hin its jurisdiction.	y and willf	ully to make to any depa	rtment or agency of the United St	lates

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(Instructions on page 2)