WFX-651 OUT GOM. DIN.

April 28, 1995

Mr. Ken Townsend

Bureau of Land Management 1235 La Plata Highway Farmington, NM 87401

070 FARMINGTON, NM

Chief, Branch of Drilling and Production

GIANT EXPLORATION & PRODUCTION COMPANY 2200 Bloomfield Highway Post Office Box 2810 Farmington, New Mexico

87499-2810

FAX 505 505 326-3325 327-7987 1 & E 3PEC FLUIDS DIA P FLUIDOI 1 I I ALL SUPV.

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Dear Mr. Townsend,

This letter is in reference to your notice dated April 25, 1995 regarding (10) wells located in San Juan County, New Mexico. Four of the wells in question (CBU #WI-3, #WI-4, #WI-13, and #WI-78) are water injectors in Giant's existing Central Bisti Unit waterflood project. Due to recent work on other injection wells and injection flowlines in the field, the injection pressure is down from pressures which were experienced in early 1994 (the last time these wells had water injection). These wells are open to the system and are capable of taking water. Due to the changing quality of the reservoir in each wellbore, some wells will take water at lower pressures due to higher porosity and permeability values. For the four wells in question, the injection pressure would need to approach 750 psi before they will take water. The current average injection pressure is 500 psi. These wells have current Mechanical Integrity Tests (MITs).

Review of the remaining six wells on your notice (CBU #13, #37, #52, #73, #WI-5, and #WI-54) has indicated that these wells have suffered failures and were temporarily shut-in after the Five Year Plan of Development was established. These wells will be included in the Five Year Plan of Development which has been expanded (please refer to the attached list of wells).

Again, I would like to bring to your attention that although work has been slow in completing the list of wells on the Plan of Development for the Central Bisti and Carson Units, Giant Exploration & Production Company has not ignored its obligation to bring its shut-in wells to regulatory compliance. During 1994, Giant plug and abandoned 5 wells in San Juan County, Utah. Additionally, 10 Fruitland Coal wells and 2 Dakota wells were plugged in the vicinity of the Central Bisti and Carson Units. Every reasonable effort is being made to complete all of Giant's wells in a timely manner.

If you have any further questions or need any more information, please do not hesitate to call me at 326-3325.

Jeffrey R \ Vaughan

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Giant Exploration & Production Company Plan of Development

Carson/Central Bisti Units

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