



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION



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March 25, 1993

Eluid Martinez
State Engineer
Bataan Memorial Building
Santa Fe, NM 87501

RE: Proposed Injection into Capitan Reef

Dear Mr. Martinez:

The Oil Conservation Division has recently received another application to inject produced salt water into a portion of the Capitan Reef, this one being from Pronghorn SWD System of Hobbs, New Mexico. We are informed that the applicant has or is submitting information to your office and soliciting your support or approval for the project.

As you may remember, there has been a previous application for the same type of operation, which the Division denied. At that time we consulted with your staff regarding a long-standing agreement between Steve Reynolds and Pete Porter under which no injection would be allowed in the Reef.

As the agency responsible for protecting fresh water as designated by your office, we are very concerned about permitting injection into the Capitan Reef. We know that there are portions of the Reef which are major sources of fresh water in the area. Our concern is that injection of produced water could at some point contaminate the fresh water.

We would very much appreciate input from the experts in your office on questions within their expertise, specifically questions about the locations of fresh water and the potential alterations of water movement within the Reef which could cause contamination. We may ask that someone from your staff provide testimony at the hearing on this application.

That hearing is currently set for April 8, 1993, in the OCD conference room in the State Land Office Building, but we plan to continue that hearing to a later docket. We would like to hear from you prior to April 8 to help us determine what input your office can provide.

Thank you for your assistance.

Sincerely,

Lawrence O. Van Ryan,
Chief Engineer

LOVR/RGS