State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez Governor

John Bemis Cabinet Secretary

Brett F. Woods, Ph.D. Deputy Cabinet Secretary Jami Bailey Division Director Oil Conservation Division



Administrative Order WFX-898-A Application Reference No. pTWG1208240780

March 25, 2013

Mr. Gary Womack Chi Operating, Inc P.O. Box 1799 Midland, TX 79702

ADMINISTRATIVE ORDER OF THE OIL CONSERVATION DIVISION

Under the provisions of Division Order R-13262, Chi Operating, Inc. (OGRID No. 4378) has made application to the Division for permission to add injection wells to its Benson Delaware Secondary Recovery Project located within the Brushy Canyon member of the Delaware formation, Benson-Delaware Pool (97083) in Eddy County, New Mexico.

THE DIVISION DIRECTOR FINDS THAT:

The application was filed in due form. No objections have been filed within the waiting period prescribed by Division Rule 19.15.26.8C (2). The proposed injection well is eligible for conversion to injection under the terms of Rule 19.15.26.8. The operator is in compliance with Rule 19.15.5.9.

The proposed **expansion** of the above-referenced waterflood project, will prevent waste, is in the best interests of conservation, will not impair correlative rights, and should be approved. It is our understanding that the E/2 of Section 11, and the W/2 of Section 12 are subject to the Federal lease NM 0560353, and this acreage has common ownership in the Delaware formation.

IT IS THEREFORE ORDERED THAT:

Chi Operating, Inc. is hereby authorized to inject water into the unitized interval, through plastic-lined tubing set in packers located within 100 feet of the top of the injection intervals in the following-described wells for purposes of secondary recovery.

Benson Delaware Unit Well No. 3W, (API No. 30-015-32210), 1980 FSL, 2310 FEL, Unit J, Section 1, T-19-S, R-30-E, Perfs: 4962-5142 feet, Surf. Pressure: 992 psi

Benson Delaware Unit Well No. 10, (API No. 30-015-35085), 2200 FNL, 330 FEL, Unit H, Section 11, T-19-S, R-30-E, Perfs: 4500-5100 feet, Surf. Pressure: 900 psi

Benson Delaware Unit Well No. 15 (API No. 30-015-38298), 150 FSL,1550 FWL, Unit N, Section1, of T-19-S, R-30-E, Perfs: 4400-5200 feet, Surf. Pressure: 880 psi

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Benson Delaware Unit Well No. 20 (API No. 30-015-38299), 1250 FNL, 350 FWL, Unit D, Section 12, T-19-S, R-30-E, Perfs: 4500-5100 feet, Surf. Pressure: 900

All the conditions contained in the original order No. R-13262 shall remain the same and there have been no additional wells drilled or plugged in the area of review.

IT IS FURTHER ORDERED THAT:

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The operator shall take all steps necessary to ensure that the injected water enters only the proposed injection interval and is not permitted to escape to other formations or onto the surface.

Prior to commencing injection operation into this well, the casing shall be pressure tested from the surface to the packer setting depth to assure casing integrity.

The casing-tubing annulus shall be loaded with an inert fluid and equipped with a pressure gauge at the surface or left open to the atmosphere to facilitate detection of leakage in the casing, tubing or packer.

The wells shall pass an initial mechanical integrity test ("MIT") prior to initially commencing disposal and prior to resuming disposal each time the disposal packer is unseated. All MIT testing procedures and schedules shall follow the requirements in Division Rule 19.15.26.11A. NMAC.

The injection well or system shall be equipped with a pressure limiting device which will limit the wellhead pressure to 0.2 psi/ft. to the uppermost injection perforations, as shown above.

The Director of the Division may authorize an increase in injection pressure upon a proper showing by the operator of said well that such higher pressure will not result in migration of the injected fluid from the permitted injection interval or harmful formation fracturing. Such proper showing shall consist of a valid step-rate test run in accordance with and acceptable to the Artesia District Office.

The operator shall notify the supervisor of the Artesia District Office of the date and time of the installation of injection equipment and of all mechanical integrity tests so that the same may be inspected and witnessed.

The operator shall immediately notify the supervisor of the Artesia District Office of the failure of the tubing, casing or packer in said wells and shall take such steps as may be timely and necessary to correct such failure or leakage.

The subject wells shall be governed by all provisions of Division Order No. R-13262, and Rules 19.15.26.9 through 19.15.26.13 not inconsistent herewith.

Jurisdiction is retained by the Division for the entry of such further orders as may be necessary for the prevention of waste and/or protection of correlative rights or upon failure of the operator to conduct operations (1) to protect fresh water or (2) consistent with the requirements in this order, whereupon the Division may, after notice and hearing, terminate the injection authority granted herein.

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Sincerely,

Bulg Jami Bailey

Director

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cc: New Mexico Oil Conservation Division District Office - Artesia United States Bureau of Land Management (BLM)