

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

David Martin
Cabinet Secretary

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

David R. Catanach, Division Director
Oil Conservation Division



Administrative Order WFX-950
December 15, 2015

**ADMINISTRATIVE ORDER
OF THE OIL CONSERVATION DIVISION**

Under the provisions of Commission Order Division Order R-2403 (as amended), ConocoPhillips Company (OGRID No. 217817) has made application to the Division for approval to add 6 injection wells to its Maljamar Cooperative Agreement (MCA) Unit in the Maljamar; Grayburg-San Andres Pool (Pool code 43329) in Lea County, New Mexico.

These wells are being proposed for injection to complement existing injection wells for enhanced oil recovery in the Grayburg-San Andres formation of the MCA Unit.

For the well locations listed in this application, the vertical description of the Maljamar; Grayburg-San Andres Pool includes the Grayburg-San Andres formation as described in Division Order No. R-2403 issued on December 31, 1962.

THE DIVISION DIRECTOR FINDS THAT:

The application has been duly filed under the provisions of Division Rule 19.15.26.8B. NMAC and satisfactory information has been provided that affected parties as defined in said rule have been notified and no objections remain outstanding. The applicant has presented satisfactory evidence that all requirements prescribed in Rule 19.15.26.8 NMAC have been met and the operator is in compliance with Rule 19.15.5.9 NMAC.

The proposed expansion of the above-referenced water flood project, will prevent waste, is in the best interests of conservation, will not impair correlative rights, and should be approved.

IT IS THEREFORE ORDERED THAT:

ConocoPhillips Company, as operator, is hereby authorized to inject water into the following wells for the purpose of secondary recovery through plastic-lined tubing set into a packer:

Table One

API No.	Well Name [Applicant Well ID]	UL-S-T-R	Surface Footage N/S	Surface Footage E/W	BHL Unit	Bottom Hole Footage N/S	Bottom Hole Footage E/W	Approved Injection Interval (TVD ft.)
30-025- Pending	MCA Unit No. 535	M-23-17S- 32E	567' FSL	128' FWL	M	Same as surface	Same as surface	3572' to 4632'
30-025- Pending	MCA Unit No. 548	D-27-17S- 32E	1040' FNL	457' FWL	E	1352' FNL	700' FWL	3519' to 4539'
30-025- Pending	MCA Unit No. 561	K-28-17S- 32E	2442' FSL	2375' FWL	F	1980' FNL	2630' FWL	3490' to 4480'
30-025- Pending	MCA Unit No. 562	K-28-17S- 32E	2311' FSL	2529' FWL	K	2608' FSL	2021' FWL	3488' to 4475'
30-025- Pending	MCA Unit No. 564	D-29-17S- 32E	771' FNL	397' FWL	D	1310' FNL	660' FWL	3389' to 4409'
30-025- Pending	MCA Unit No. 565	D-29-17S- 32E	1315' FNL	1059' FWL	D	660' FNL	1309' FWL	3439' to 4439'

The approved maximum surface injection pressure shall be **2150** pounds per square inch (psi) for the wells listed in Table One, as stated in Division Order R-2403-B, issued on June 8, 2010. The operator shall set the injection packer in individual wells no more than 100 feet above the shallowest perforation for the permitted injection interval.

IT IS FURTHER ORDERED THAT:

The operator shall take all steps necessary to ensure that the injected fluid enters only the approved injection interval and is not permitted to escape to other formations or onto the surface. This includes the completion and construction of the wells as proposed in the application.

After installing tubing, the casing-tubing annulus for each well shall be loaded with an inert fluid and equipped with a pressure gauge or an approved leak detection device in order to determine leakage in the casing, tubing, or packer. The casing shall be pressure tested from the surface to the packer setting depth to assure casing integrity.

All wells shall pass an initial mechanical integrity test ("MIT") prior to initially commencing injection and prior to resuming injection each time any injection packer is unseated. All MIT procedures and schedules shall follow the requirements in Division Rule 19.15.26.11A. NMAC. The Division Director retains the right to require at any time wireline verification of completion and packer setting depths in the subject wells.

The wellhead injection pressure on the subject wells shall be limited as listed above. In addition, the injection well or header system shall be equipped with a pressure limiting device in

workable condition which shall, at all times, limit surface tubing pressures to the maximum allowable pressures for these wells.

Subject to the limitations within the hearing order permitting this project, the Director of the Division may authorize an increase in tubing pressure upon a proper showing by the operator of said wells that such higher pressure will not result in migration of the injected fluids from the approved injection interval. Such proper showing shall be demonstrated by sufficient evidence including but not limited to an acceptable Step-Rate Test.

The operator shall notify the supervisor of the Division's District I office of the date and time of the installation of injection equipment and of any MIT test so that the same may be inspected and witnessed. The operator shall provide written notice of the date of commencement of injection for each well to the Division's District I office. The operator shall submit monthly reports of the injection operations on Division Form C-115, in accordance with Division Rules 19.15.26.13 and 19.15.7.24 NMAC.

Without limitation on the duties of the operator as provided in Rules 19.15.29 and 19.15.30 NMAC, or otherwise, the operator shall immediately notify the District I office of any failure of the tubing, casing or packer in the approved injection wells, or of any leakage or release of water, oil or gas from around any produced or plugged and abandoned well in the area, and shall take such measures as may be timely and necessary to correct such failure or leakage.

The injection authority granted under this order is not transferable except upon Division approval. The Division may require the operator to demonstrate mechanical integrity of any injection well that will be transferred prior to approving transfer of authority to inject.

The Division may revoke this injection permit after notice and hearing if the operator is in violation of Rule 19.15.5.9 NMAC.

Compliance with this order does not relieve the operator of the obligation to comply with other applicable federal, state or local laws or rules, or to exercise due care for the protection of fresh water, public health and safety and the environment.

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 or protectable waters or (2) consistent with the requirements in this order, whereupon the Division may, after notice and hearing, terminate the disposal authority granted herein. The subject wells shall be governed by all provisions of Order R-10020 (as amended) and associated administrative orders.

The injection authority granted herein shall terminate two (2) years after the effective date of this order if the operator has not commenced injection operations into at least one of the subject wells, provided however, the Division, upon written request by the operator received prior to the two-year deadline, may grant an extension thereof for good cause shown.



DAVID R. CATANACH
Director

DRC/mam

cc: Oil Conservation Division – Hobbs
Bureau of Land Management - Carlsbad
File Case No. 14421
Application number – pMAM1533640871