State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez Governor

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



October 18, 2016

Mr. Patrick McMahon, Attorney 311 North First Street Lovington, NM 88260

RE: DENIAL OF APPLICATION FOR CHANGE IN TUBING SIZE Russell Federal 35 SWD Well No. 2 (API 30-015-05891) 433° FNL, 660° FEL; Unit A, Sec 35, T26S, R31E, NMPM, Eddy County, New Mexico

Mr. McMahon:

The Division has received the application for authority to change the tubing size in the subject reference well submitted on behalf of MNA Enterprises LTD Company (OGRID 124768; the "Applicant"). The referenced well was authorized for injection into the Delaware Mountain Group by Administrative Order SWD-471 issued April 8, 1992. Further, on May 6, 2016 Applicant requested that the produced water disposal well be changed from a lease only well to a commercial disposal well, with certain stipulations.

The Applicant has failed to meet the requirements stipulated in the May 6, 2016 letter. The first requirement that was not satisfied was for verification of the total depth of the subject well. Next, the Applicant has not supplied a contact person to the Division. The Division requested logs on the subject well which have not been submitted. Next, the C-115 report submitted by the Applicant did not contain the required pressure data. Lastly, a chart recorder or other approved devise was required to ensure that the pressure was below 821 psi.

Consequently, the application submitted for the subject well cannot be approved administratively and is <u>denied</u>.

The Application can be re-submitted for consideration at such time as all requirements contained within the May 6, 2016 letter are completed with by the Applicant.

Application for Change in Tubing Size MNA Enterprises LTD Company October 18, 2016 Page 2 of 2

Sincerely,

DAVID R. CATANACH

DAVID R. CATAN Director

DRC/mam

Cc: Well file 30-015-05891 Administrative Application – SWD-471 Oil Conservation Division - Artesia Bureau of Land Management - Carlsbad

LAW OFFICES

HEIDEL, SAMBERSON, COX & McMAHON

C. GENE SAMBERSON LEWIS C. COX, III PATRICK B. McMAHON 311 NORTH FIRST STREET POST OFFICE DRAWER 1599 LOVINGTON, NM 88260 TELEPHONE (575) 396-5303 FAX (575) 396-5305 F.L. HEIDEL (1913-1985)

October 14, 2016

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

> RE: MNA Enterprises, Ltd. Co. Russell Fed 35 #2 API 30-015-05891 SWD-471

Dear Mr. Jones:

This firm's client, MNA Enterprises, Ltd., Co., purchased the above referenced leasehold and SWD some time ago. The #2 well passed its most recent MIT, but the tubing has been in the hole for a long time. MNA wants to do some remedial work on this well, clean out scale in the bottom and change out tubing. The well currently has 2 3/8" tubing. MNA has found a bargain on a string of 2 7/8" IPC tubing which they would like to put back in the well. Before MNA files a C-103 with the District on remedial work and testing, can MNA exchange the 2 3/8" tubing for the 2 7/8"?

Your attention to this matter is greatly appreciated.

HEIDEL, SAMBERSON, COX & MCMAHON

By:

PBM:st Enclosures cc: MNA Eddie Seay