

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

**APPLICATION OF OXY USA, INC.  
FOR APPROVAL OF A PRESSURE  
MAINTENANCE PROJECT, EDDY  
COUNTY, NEW MEXICO.**

**CASE NO. 20449  
ORDER NO. R-21383**

**ORDER OF THE DIVISION**

This case came in for hearing before the Oil Conservation Division (“OCD”) at 8:15 a.m. on May 2, 2019, in Santa Fe, New Mexico.

The OCD Director, having considered the testimony, the record, the recommendations of Hearing Examiner Scott Dawson, these findings of fact, and conclusions of law issues this Order.

**FINDINGS OF FACT**

(1) Due notice has been given, and the OCD has jurisdiction of the subject matter of this case.

(2) By this application, OXY USA, Inc. ("Applicant" or “OXY”) seeks approval of a pressure maintenance project in the Bone Spring formation, Pierce Crossing; Bone Spring, East pool (Pool code 96473), within the following 480 acres, more or less, within Eddy County, New Mexico:

Township 24 South, Range 29 East, NMPM  
S/2 N/2 and S/2 of Section 15

(3) Applicant proposes to inject produced gas, produced water and produced CO<sub>2</sub> into the existing Cedar Canyon 15 No. 3H at a true vertical depth interval from approximately 8736 feet to approximately 8810 feet below the surface, through the following horizontal well:

(a) Cedar Canyon 15 No. 3H (API No. 30-015-41594) with a surface location of 1888 feet from the South line and 700 feet from the West line (Unit letter L) of Section 15, Township 24 South, Range 29 East, NMPM, and a terminus of 2007 feet from the South line and 230 feet from the East line (Unit letter I) of Section 15, Township 24 South, Range 29 East, NMPM.

(b) The injection will benefit two producing offsetting wells: the Cedar Canyon 15 No. 2H (API No. 30-015-41032) and the Cedar Canyon 15 No. 4H (API No. 30-015-41291).

(4) No other party appeared at the hearing or otherwise opposed the application.

(5) Applicant appeared through counsel and presented engineering testimony and exhibits to the effect that:

- (a) In this area of Eddy County, the 2nd Bone Spring sand is a productive interval within the Bone Spring formation and is well delineated and characterized.
- (b) The Cedar Canyon 15 No. 3H (the “proposed injection well”) is a horizontal well in the Bone Spring formation that is producing from the 2nd Bone Spring sand.
- (c) Applicant has designed a pressure maintenance project limited to the S/2 N/2 and S/2 of Section 15 utilizing the proposed injection well to benefit these two existing horizontal oil wells, the Cedar Canyon 15 No. 2H (API No. 30-015-41032) and the Cedar Canyon 15 No. 4H (API No. 30-015-41291).
- (d) Applicant will utilize produced water for injection as a component of pressure maintenance in conjunction with the produced gas injection to mitigate early offset breakthrough at low injection pressures.
- (e) Applicant will utilize the proposed injection well with existing perforations and well construction. Applicant additionally stated that the proposed injection well will not be stimulated prior to the beginning of the pilot project.
- (f) Applicant provided analyses of the produced water and produced gas along with testimony demonstrating compatibility with well components and the reservoir conditions.
- (g) Applicant has proposed maximum surface injection pressures for each injection fluid: 1745 pounds per square inch (psi) for produced water, 4350 psi for produced gas and 2300 psi for carbon dioxide. Applicant submitted pressure analyses in support of the proposed maximum surface injection pressures.
- (h) Applicant has proposed the placement of the packer in the vertical portion of the production casing at a depth of approximately 7900 feet, which is below the top of the confining barrier but more than 100 feet above the first perforations in the horizontal part of the well bore. Applicant requested an exception for the 100-foot packer setting depth requirement applied to vertical injection wells.
- (i) Applicant has requested that unlined tubing be allowed for use in the injection operation of produced gas and CO<sub>2</sub> and lined tubing when injecting water. Applicant stated that the unlined tubing would be preferable due to the increased use of wireline equipment in the proposed injection well, and the lack of significantly corrosive fluids being used for injection.
- (j) Applicant established a modified area of review (AOR) using the horizontal segment of each well (as defined by the surface location, the first take point, and the terminus) as the

center line for the one-half mile radius, the AOR being defined as the area within one-half mile of any point on the horizontal well lateral. Applicant looked at the injection interval and analyzed any part of the wellbore penetrating the Bone Spring formation. All 46 active wells within the two AORs are properly cemented. There are no plugged wells in the AOR.

- (k) Applicant found no fresh water wells within one mile of the proposed injection wells.
- (l) Applicant has provided proper notice to affected persons. Applicant has also published notice of the pilot project in Carlsbad Current-Argus, a newspaper with general circulation in the county where the project is located.

### **CONCLUSIONS OF LAW**

(6) All of the wells in the one-half mile modified AOR surrounding the proposed injection well appear to be adequately cased and cemented, so that none will become a conduit for the escape of injected fluid or gas from the permitted injection formation. Accordingly, there is no requirement for remedial work on any wells within the modified AOR for the injection well.

(7) Applicant should be authorized to inject fluids at a surface injection pressure not to exceed 1745 pounds per square inch (psi) for produced water, 4350 psi for produced gas and 2300 psi for carbon dioxide. Applicant may apply to the OCD for a higher injection pressure upon satisfactorily demonstrating that an increase in injection pressure will not result in fracturing of the injection formation or confining strata.

(8) The proposed project will, in reasonable probability, result in production of substantially more hydrocarbons from the project area that would otherwise be produced therefrom, will prevent waste, and will not impair correlative rights.

- (9) Accordingly, the application should be approved.

### **ORDER**

(1) OXY USA, Inc. ("OXY" or "operator") is hereby authorized to inject produced water and produced gas into the Bone Spring formation [Pierce Crossing; Bone Spring, East pool (Pool code: 96473)], at a true vertical depth interval from approximately 8376 feet to approximately 8810 feet below the surface, through one of its horizontal wells located within its OXY fee lease.

(2) This project is hereby designated the Cedar Canyon Pressure Maintenance Pilot Project and shall consist of the Bone Spring formation underlying the following lands in Eddy County, New Mexico:

Township 24 South, Range 29 East, NMPM  
S/2 N/2 and S/2 of Section 15

(3) OXY USA, Inc. (OGRID 16696) is designated operator of the project.

(4) The existing horizontal well (the “injection well”) is approved for injection:

(a) Cedar Canyon 15 No. 3H (API No. 30-015-41594) with a surface location of 1888 feet from the South line and 700 feet from the West line (Unit letter L) of Section 15, Township 24 South, Range 29 East, NMPM, and a terminus of 2007 feet from the South line and 230 feet from the East line (Unit letter I) of Section 15, Township 24 South, Range 29 East, NMPM.

(5) The operator shall take all steps necessary to ensure that the injected fluid enters only the injection interval and is not permitted to escape to other formations or onto the surface from injection, production, or plugged and abandoned wells.

(6) The injection wells shall use the existing construction with injection occurring through perforations currently in place.

(7) Water from outside the operator’s Cedar Canyon Treating Facility shall not be injected into these wells. Produced water is treated and sourced from wells completed in the Bone Springs and Delaware Formations. The operator shall utilize its Cedar Canyon Central Delivery Point for the source of the produced gas to be used in the injection phases of the pilot project. The source of the produced gas is from nearby wells in the Delaware and 1<sup>st</sup> and 2<sup>nd</sup> Bone Spring.

(8) Injection shall be accomplished through tubing installed in a packer set in the production casing so as to provide a proper seal. Applicant has proposed the placement of the packer in the vertical portion of the production casing at a depth of approximately 7900 feet, which is below the top of the confining barrier but more than 100 feet above the first perforation in the horizontal part of the well bore. Applicant requested an exception for the 100-foot packer setting depth requirement applied to vertical injection wells.

(9) The injection well shall be initially equipped with a pressure control device or acceptable substitute that will limit the maximum surface injection pressure to no more than 1745 pounds per square inch (psi) for produced water, 4350 psi for produced gas and 2300 psi for carbon dioxide.

(10) The casing-tubing annulus shall be filled with an inert fluid, and a gauge or approved leak-detection device shall be attached to the annulus in order to detect leakage in the casing, tubing or packer.

(11) The injection well shall pass a mechanical integrity test prior to initial commencement of injection and prior to resumption of injection each time the packer is unseated. All testing procedures and schedules shall conform to the requirements of Rule 19.15.26.11(A) NMAC. The Division Director retains the right to require at any time wireline verification of completion and packer setting depths.

(12) The injection well shall be tied into a SCADA monitoring system which will provide immediate notification of any failure or release.

(13) The Division Director shall have the authority to administratively authorize an increase in injection pressure upon a showing by the operator that such higher pressure will not result in fracturing of the injection formation or confining strata. The operator shall give at least 72 hours advance notice to the supervisor of the OCD's District II office of the date and time (i) injection equipment will be installed, and (ii) the mechanical integrity pressure test will be conducted, so these operations may be witnessed.

(14) The operator shall provide written notice of the date of commencement of injection into each of the wells to the OCD's District II office.

(15) The operator shall immediately notify the supervisor of the OCD's District II office of the failure of the tubing, casing or packer in the injection well, or the leakage of water, oil, gas or other fluid from or around any producing or abandoned well within one-half mile of the injection well, and shall take all steps as may be timely and necessary to correct such failure or leakage.

(16) The Project shall be governed by OCD Rules 19.15.26.8 through 19.15.26.15 NMAC. The operator shall submit monthly reports of the injection operations on OCD Form C-115, in accordance with Rules 19.15.26.13 and 19.15.7.28 NMAC.

(17) The injection authority granted herein shall terminate two years after the effective date of this order if the operator has not commenced injection operations; provided, however, the OCD, upon written request by the operator filed prior to the expiration of the two-year time period, may grant an extension for good cause.

(18) The operator shall provide written notice to the OCD upon permanent cessation of injection into the Project.

(19) This Order does not relieve the operator of responsibility should its operations cause any actual damage or threat of damage to protectable fresh water, human health or the environment; nor does it relieve the operator of responsibility for complying with applicable OCD rules or other state, federal or local laws or regulations.

(20) Upon failure of the operator to conduct operations (1) in such manner as will protect fresh water or (2) in a manner consistent with the requirements in this Order, the OCD may, after notice and hearing (or without notice and hearing in event of an emergency, subject to the provisions of NMSA 1978 Section 70-2-23), terminate the injection authority granted herein.

(21) Jurisdiction of this case is retained for the entry of such further orders as the OCD may deem necessary.

DONE at Santa Fe, New Mexico, on this 21st day of July, 2020.

**STATE OF NEW MEXICO**  
**OIL CONSERVATION DIVISION**

A handwritten signature in black ink, appearing to read 'ASD', is written over a horizontal line.

**ADRIENNE SANDOVAL**  
**DIRECTOR**