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## New Mexico Bureau of Mines & Mineral Resources

Socorro, NM 87801

A DIVISION OF  
NEW MEXICO INSTITUTE OF MINING & TECHNOLOGY

May 16, 1983



Mr. Joe Ramey  
Oil Conservation Commission  
P.O. Box 2088  
Santa Fe, NM 87501

Dear Mr. Ramey:

Dr. Kottlowski has asked me to respond to your proposed geothermal rule changes. Most changes seem straightforward, however, we do have specific comments on the following items:

page A-1, definition of GEOTHERMAL OBSERVATION WELL

The words "geothermal resources" seem to exclude the use of existing wells (drilled for other purposes) for observation. If this is not the intent of the rule change, why not delete these two words?

Suggested revision:

"GEOTHERMAL OBSERVATION WELL shall mean any well which is to be utilized for the express purpose of evaluating or monitoring a geothermal reservoir by pressure observation or limited production."

page A-2, definition of THERMAL GRADIENT WELL

This suggestion concerns the existing wording not the proposed change but follows from the comment on p. A-1. Again, the word "drilled" excludes the use of existing wells for this purpose. How about adding "or used" after "drilled"?

Suggested revision:

"THERMAL GRADIENT WELL shall mean a well drilled or used solely for temperature observation purposes, and which shall not be completed as a geothermal producing well or as an injection or disposal well."

page H-1, rule 601, 2nd paragraph

Is depth (<500 ft) the criterion? If so, why not clarify by deleting other qualifiers?

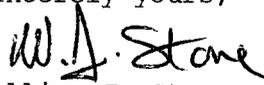
Also, should it be the only criterion? Surely BP's should be required even for shallow depths in areas where steam is expected.

Suggested revision:

"Blowout preventers shall not be required for the drilling of holes less than 500 feet deep and not expected to produce steam."

Hope these comments are of use. If I may be of further assistance, don't hesitate to contact me.

Sincerely yours,

  
William J. Stone, Ph.D.  
Hydrogeologist

WJS:lm