

## Jones, William V., EMNRD

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**From:** Jones, William V., EMNRD  
**Sent:** Friday, September 10, 2010 5:26 PM  
**To:** 'Pam Inskeep'; 'William Carr'; 'Ocean Munds-Dry'  
**Cc:** Sanchez, Daniel J., EMNRD; Macquesten, Gail, EMNRD; Davidson, Florene, EMNRD; 'Wesley\_Ingram@blm.gov'  
**Subject:** Disposal application from BTA Oil Producers, LLC: BTA 20504 JV-P Owl #5 30-015-35435 (Reinstate SWD-1091)

*Case 14459*

Hello Pam:

The director has today instructed me to not proceed further with administrative approval and suggested the Division will only consider this application after notice and an examiner hearing. You probably know about the 30 day wait to get a case heard, so please let your management know immediately about this and ask your attorney to open a case with Florene Davidson as soon as is prudent.

In the hearing, please be prepared to address at least the following:

- a. The schedule to re-plug the 30-015-10730 well as part of the Area of Review work – per request below and with BLM guidance.
- b. Any Rule 5.9 issues.
- c. New, updated, corrected, wellbore diagrams (with API numbers on top) for all AOR wells and for the subject well (showing at least casing, cement, tubing, and packer depth)
- d. MIT status of the subject well.

For the hearing, please again provide “notice” of this application for SWD to:

- a. the Division’s Compliance and Enforcement director (or his attorney),
- b. the surface owner, and
- c. all “affected persons” within ½ mile of this well, according to OCD Rule **19.15.26.7**

### DEFINITIONS:

A. “Affected person” means the division designated operator; in the absence of an operator, a lessee whose interest is evidenced by a written conveyance document either of record or known to the applicant as of the date the applicant files the application; or in the absence of an operator or lessee, a mineral interest owner whose interest is evidenced by a written conveyance document either of record or known to the applicant as of the date the applicant filed the application for permit to inject.

Will Jones

New Mexico

Oil Conservation Division

Images Contacts

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**From:** Jones, William V., EMNRD  
**Sent:** Thursday, June 17, 2010 9:20 AM  
**To:** 'Pam Inskeep'  
**Cc:** 'Dustin\_Winkler@blm.gov'; Sanchez, Daniel J., EMNRD; Phillips, Dorothy, EMNRD; Ezeanyim, Richard, EMNRD; Dade, Randy, EMNRD  
**Subject:** RE: BTA 20504 JV-P Owl #5 App to Inject

Hello Pam:

Thanks for the updated diagrams and information. This clears up a lot, but some loose ends remain.

- a. Sounds like the 30-015-34749 well is still a valid producer. Since the BLM has protested this application because of this 30-015-34749 well, please send an explanation and those new wellbore diagrams to Dustin Winkler in Carlsbad with BLM and ask him to retract the protest. Once a protest is received, we cannot proceed until retracted.

- b. On the 30-015-10730 well, it appears a plug should have been placed over the 9-5/8 inch cut/pull point at 1783 feet. Would you please find out from your field people the likely reason this was not done? (for my information and for the records in this application)

The plugging bond issue. As I understand it, you get the individual well bonds back as soon as the well no longer requires this bond and they can be posted very quickly with Dorothy Phillips of this office. I can't release any injection/disposal permit until bonds are posted – per OCD Rule 5.9.

- c. Clearly BTA needs an individual well bond posted for one well of the 94 wells listed for OGRID 260297.
- d. The stranded OGRID 3019 has 5 wells and from your information it appears they are being taken care of. The trouble is they show up in our records as each well needing a bond. I will ask Dorothy and Daniel if this is OK but it would be better if you would work with them and the Artesia district office on this issue.

Will Jones  
New Mexico  
Oil Conservation Division  
Images Contacts