

Case File 11297/98

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AS HINKLE, COX, EATON,
COFFIELD & HENSLEY, P.L.L.C., LTD., CO.

*NOT LICENSED IN NEW MEXICO
*FORMERLY COMPRISING THE FIRM OF
CULTON, MORGAN, BRITAIN & WHITE, P.C.

October 25, 1995

HAND-DELIVERY

Michael E. Stogner
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87501

RECEIVED
OCT 25 1995
Oil Conservation Division

Re: Avalon (Delaware) Unit; Order No. R-10460

Dear Mr. Stogner:

Further to Exxon's request for a change of Decretory Paragraph 10 of the Order, enclosed is a copy of page 7 of Exhibit 32 (the Form C-108) from the hearing, modified to show Exxon's proposal for drilling injection wells. As I believe Exxon has discussed with you, it would like changes in the injection order to permit some flexibility in drilling the injection wells. In addition, the cement between the lines and casing will be pressure tested.

Very truly yours,

HINKLE, COX, EATON, COFFIELD
& HENSLEY, P.L.L.C., Ltd., Co.



James Bruce

Enclosure
JB/sp

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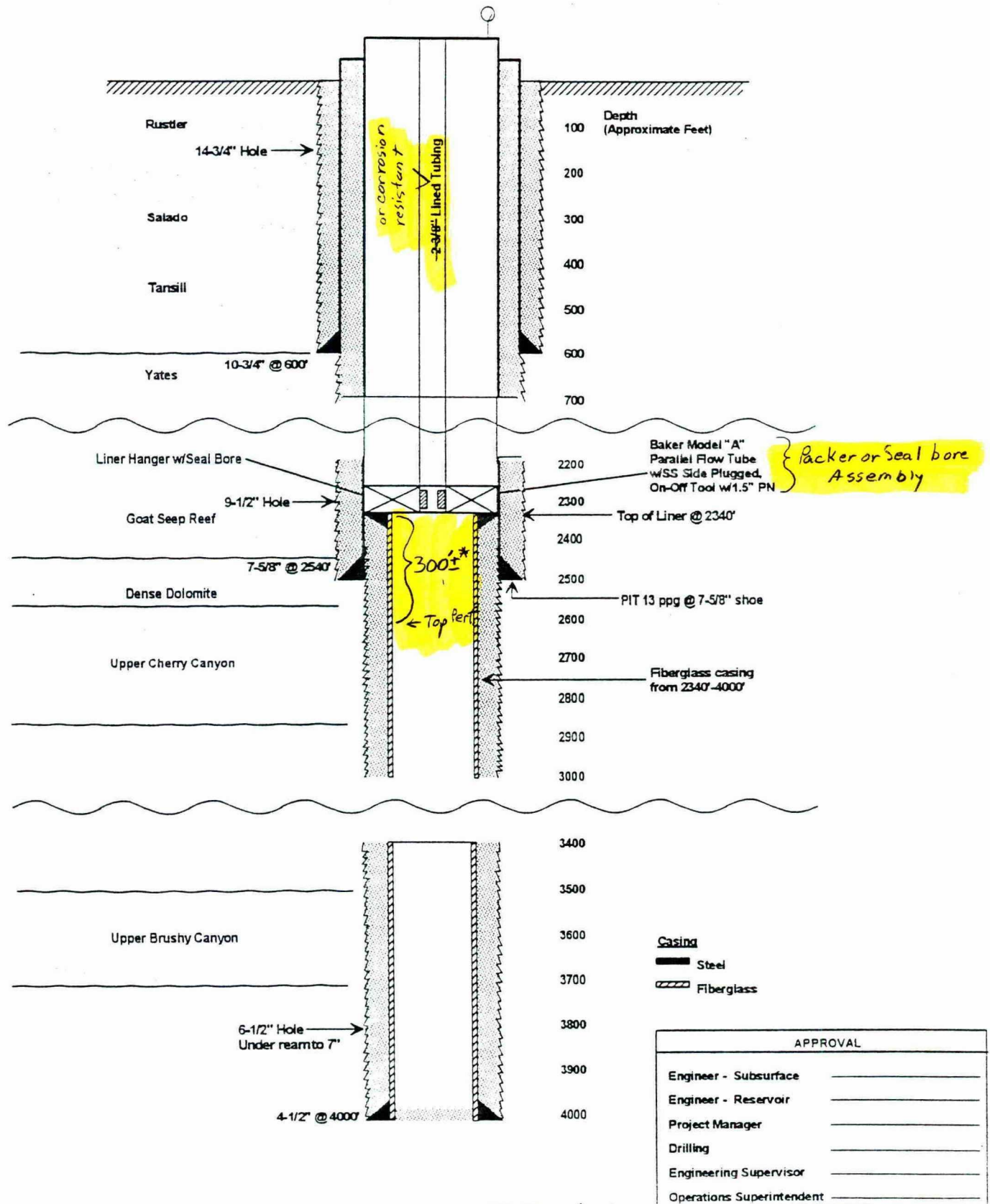
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Avalon Project Proposed Drillwell Waterflood



* NMOC District Director may administratively authorize other depths.

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October 20, 1995

HAND DELIVERY

Michael E. Stogner
Oil Conservation Division
2040 So. Pacheco Street
Santa Fe, New Mexico 87505

Re: Order No. R-10460, Avalon (Delaware) Unit

Dear Mr. Stogner:

I know Exxon has been in touch with you regarding the configuration of the injection wells. Due to inattention on our part, we failed to recognize that the Avalon (Delaware) Unit Order contained language regarding the injection wells which was inconsistent with our presentation at the hearing. As a result, in order to conform to Exhibit No. 32 submitted at the hearing by Exxon, Exxon proposes the following substitute language for Decretory Paragraph (10) of the Order:

(10) Injection shall be accomplished through lined or otherwise corrosion-resistant tubing installed in a packer or seal bore assembly to isolate the casing-tubing annulus set approximately within 300 feet of the uppermost injection perforation; the casing-tubing annulus in each well shall be filled with an inert fluid and equipped with an approved pressure gauge or attention-attracting leak detection device. The Division District Office may administratively authorize the setting of the casing-tubing isolation device at a shallower depth if appropriate.

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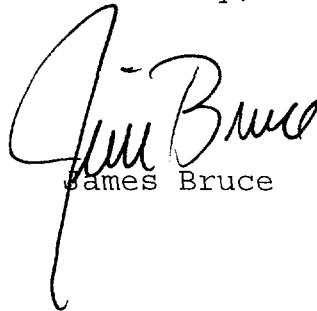
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Michael E. Stogner
October 20, 1995
Page 2

Finding Paragraph (29) will also have to be revised accordingly. Bill Duncan will be in town Monday and is available to meet with you on this matter.

Very truly yours,

Hinkle, Cox, Eaton, Coffield
& Hensley, P.L.L.C., Ltd., Co.



James Bruce

JB/sp