

CASE NO. 11403
Order No. R-10525
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(21) Applicant testified that it may expand the pilot pressure maintenance project at a later time to include other areas of the Livingston Ridge-Delaware Pool. In this regard, applicant requested an administrative procedure whereby the subject pilot pressure maintenance project may be administratively expanded to include additional lands and/or injection wells.

(22) Given the location of the pilot pressure maintenance project with respect to certain "sensitive areas", the expansion of the subject project should be considered by the Division only after notice and hearing.

(23) The injection of water into the proposed injection well should be accomplished through 2 7/8 inch internally plastic-lined tubing installed in a packer set at approximately 7,000 feet; the casing-tubing annulus should be filled with an inert fluid and a gauge or approved leak-detection device should be attached to the annulus in order to determine leakage in the casing, tubing or packer.

(24) Prior to commencing injection operations into the subject well, and at a frequency of every three years thereafter, the casing should be pressure tested throughout the interval from the surface down to the proposed packer setting depth, to assure the integrity of such casing.

(25) In order to verify the external mechanical integrity of the Neff Federal Well No. 3, the applicant should be required, subsequent to commencing injection operations into the subject well and annually thereafter, to conduct a radioactive tracer survey in accordance with a Division approved method.

(26) The injection well or pressurization system should be initially equipped with a pressure control device or acceptable substitute which will limit the surface injection pressure to no more than 1,410 psi.

(27) The Division Director should have the authority to administratively authorize a pressure limitation in excess of the pressure limitation described above upon a showing by the operator that such higher pressure will not result in the fracturing of the injection formation or confining strata.

(28) The operator should give advance notification to the supervisor of the Artesia District Office of the Division of the date and time of the installation of injection equipment, of any mechanical integrity pressure tests, and of the conductance of the aforesaid radioactive tracer survey in order that the same may be witnessed.