State of New Mexico ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT Santa Fe, New Mexico 87505



OIL CONSERVATION DIVISION



February 20, 1995

Enron Oil & Gas Company P. O. Box 2267 Midland, Texas 79702

Attention: Betty Gildon

Administrative Order TX-215

Dear Ms. Gildon:

Reference is made to your request for an exception to the tubing setting requirements as contained in Division Rule 107 (d) (3) for the below-named well.

Pursuant to the authority granted me by Rule 107 (d) (4), you are hereby authorized to make a tubingless completion in the following well:

Well Name and Number: Diamond "7" State Well No. 2

Location: Section 7, Township 25 South, Range 34 East, NMPM,

Lea County, New Mexico

Remarks: Production tubing will be required when subject well ceases to flow.

The Division reserves the right to rescind this authority in the event that waste appears to be resulting therefrom.

Sincerely,

William J. LeMay

Director

WJL/RJ/kv

cc: Oil Conservation Division - Hobbs

VILLAGRA BUILDING - 408 Galisteo

Forestry and Resources Conservation Division P.O. Box 1948 87504-1948 827-5830 Park and Recreation Division

Park and Recreation Division P.O. Box 1147 87504-1147 827-7465 2040 South Pacheco

Office of the Secretary 827-5950

Administrative Services 827-5925

Energy Conservation & Management 827-5900

Mining and Minerals 827-5970

Oil Conservation

PVZV 2005535445

ENRVN Oil & Gas Company

OIL CONSERVE TON DIVISION

Midland, Texas 79702 (915) 686-3600

RECEIVED

Mr.Jerry Sexton

New Mexico Oil Conservation Commission

P.O. Box 2088

Sante Fe. New Mexico 87501

January: 16, 199595 JAN 23 AM 8 52

Re:

Diamond "7" State No. 2

Sec 7, T25S, R34E

Red Hills Filed

Lea County, New Mexico

Dear Mr. Sexton:

Enron Oil & Gas respectfully requests your approval to complete and produce the above-referenced well from the Bone Spring formation (perforations 12290 to 12340) without the use of production tubing. The referenced well contains the following tubulars:

CASING	<u>GRADE</u>	DEPTH	TOP OF CEMENT
11-3/4"	H-40	679	Circulated
8-5/8"	S-80	5040	Circulated
5-1/2"	P-110	12545	5300

The well was fracture treated via the 5-1/2" production casing and has been allowed to flowback through that casing to achieve faster cleanup and to minimize the risk of formation damage. Our plans are to install 2-/78" production tubing when the well ceases to flow, which should occur within the first year or two of production.

We believe this "tubingless" completion technique is completely safe and effective for the following reasons:

- The well is in a known producing field
- No corrosive or pressure problems are know to exist
- The well is a single completion
- The 5-1/2" production string has been cemented into the base of the 8-5/8" casing
- The 5-1/2" is very high strength casing

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- The stabilized after-frac flowing tubing pressures are low (less than 1,000 psig)
- The technique lowers the cost of the completion, thereby improving the economics of the project

Thank you for your consideration of this request. If you need additional information, please contact me.

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Sincerely,

Betty A. Gildon

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Part of the Enron Group of Energy Companies