New Mexico Energy, Minerals and Natural Resources Department

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Administrative Order WFX-884

April 28, 2011

Jalyn N. Fiske ConocoPhillips Company 3300 N. "A" Street, Bldg. 6 Midland, TX 79705

ADMINISTRATIVE ORDER OF THE OIL CONSERVATION DIVISION

Under the provisions of Division Order R-10017, ConocoPhillips Company has made application (*administrative application reference No. pTGW1030150710*) to the Division for permission to add 11 water injection wells to its East Vacuum Grayburg-San Andres Unit Waterflood Project in the Vacuum; Grayburg San Andres Pool (62180) in Lea County, New Mexico.

THE DIVISION DIRECTOR FINDS THAT:

The application was filed in due form. No objections have been filed within the waiting period prescribed by Division Rule 26.8C(2). The proposed injection wells are eligible for conversion to injection under the terms of Rule 26.8. The operator is in compliance with Rule 5.9.

The proposed expansion of the above-referenced waterflood project, will prevent waste, is in the best interests of conservation, will not impair correlative rights, and should be approved.

IT IS THEREFORE ORDERED THAT:

ConocoPhillips Company (OGRID No. 217817) is hereby authorized to alternately inject water and CO_2 into the Vacuum, Grayburg and San Andres formations at approximately 4100 feet to approximately 4900 feet through plastic-lined tubing set in packers located within 100 feet of the top of the injection intervals in the following-described wells for purposes of secondary recovery:

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VGEU

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API	Well #	Unit	Sec	Tsp	Rge	Top Perf	Bot Perf	Tubing	Pressure
30-025-20709	002-06		32	17S	35E	5985	6146	2.375	1200
30-025-20829	005-03	0	29	17S	35E	6103	6148	2.375	1200
30-025-37851	002-21	A	32	17S	35E	6040	6104	2.375	1200
30-025-37852	002-22	G	32	17S	35E	6042	6124	2.375	1200
30-025-20864	017-02	I	31	17S	35E	6048	6076	2.375	1200
30-025-20886	025-02	С	32	17S	35E	6080	6158	2.375	1200
30-025-20885	025-03	E	32	17S	35E	6072	6164	2.375	1200
30-025-20370	037-02	A	31	17S	35E	6069	6174	2.375	1200
30-025-20290	037-03	G	31	17S	35E	5997	6165	2.375	1200

IT IS FURTHER ORDERED THAT:

The operator shall take all steps necessary to ensure that the injected water enters only the proposed injection interval and is not permitted to escape to other formations or onto the surface.

Prior to commencing injection operations into these wells, the casing shall be pressure tested from the surface to the packer setting depth to assure casing integrity.

The casing-tubing annulus shall be loaded with an inert fluid and equipped with a pressure gauge at the surface or left open to the atmosphere to facilitate detection of leakage in the casing, tubing or packer.

The injection wells or injection system shall be equipped with pressure limiting devices which will limit the wellhead pressure to the maximum surface injection pressure described above.

The Director of the Division may authorize increases in injection pressure upon a proper showing by the operator that higher pressure will not result in migration of the injected fluid from the permitted injection interval or harmful formation fracturing. Such proper showing shall consist of valid step-rate tests and possibly injection profiles or pressure transient testing run in accordance with and acceptable to this office.

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The operator shall notify the supervisor of the District Office of the date and time of the installation of injection equipment and of all mechanical integrity tests so that the same may be inspected and witnessed.

The operator shall immediately notify the supervisor of the District Office of the failure of the tubing, casing or packer in said wells and shall take such steps as may be timely and necessary to correct such failure or leakage.

The subject wells shall be governed by all provisions of Division Order No. R-10017, and Rules 26.9 through 26.13 not inconsistent herewith.

<u>PROVIDED FURTHER THAT</u>, jurisdiction is retained by the Division for the entry of such further orders as may be necessary for the prevention of waste and/or protection of correlative rights or upon failure of the operator to conduct operations (1) to protect fresh water or (2) consistent with the requirements in this order, whereupon the Division may, after notice and hearing, terminate the injection authority granted herein.

The injection authority granted herein shall terminate two years after the effective date of this order if the operator has not commenced injection operations into at least one of the subject wells, provided however, the Division, upon written request by the operator received prior to the one year deadline, may grant an extension thereof for good cause shown.

Jami Bailey Division Director

JB/tw

cc: Oil Conservation Division -Hobbs