Warnell, Terry G, EMNRD

To:

wingram@blm.gov

Cc:

Ezeanyim, Richard, EMNRD

Subject:

RE: Resaca Operating Company Waterflood Expansion

ase 14672

Hi Wesley,

I appreciate the information and your objection.

I do have an Administrative Application on my desk from Resaca It's a Water Flood Expansion for seven existing (P&A'd or TA'd) wells in the Cooper Jal Unit:

Cooper Jal Unit Well No. 108 [4] 30-025-1/142

Jalmat and Langlie Mattix Pools

Cooper Jal Unit Well No. 109 Fed 30-025- #/33

Jalmat Pool Only

Cooper Jal Unit Well No. 114 30-025-09559 Jalmat and Langlie Mattix Pools Fell

Cooper Jal Unit Well No. 148

30-025-09642 Jalmat and Langlie Mattix Pools FCC 30-025-09621 Jalmat Pool Only FCC and Longlie Mattix

Cooper Jal Unit Well No. 206

Cooper Jal Unit Well No. 213 dd 30-025-09623

30-025-09649 Jalmat Pool Only / € € € Cooper Jal Unit Well No. 230

Jalmat and Langlie Mattix Pools

Starting back in 1993 OCD has approved four Water Flood Expansion for this unit WFX-648, WFX-657, WFX-671 and WFX-876.

I will let Resaca's agent Keith Master know that we have received an objection to their WFX application and said application has been denied. They do have the option to ask for a hearing. If Resaca sets a hearing date then you or one of your staff will need to testify at the hearing here in Santa Fe. I will let you know when that is if it happens.

Thanks again

Terry

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----Original Message----

From: wingram@blm.gov [mailto:wingram@blm.gov]

Sent: Wednesday, April 20, 2011 6:23 PM

To: Warnell, Terry G, EMNRD

Subject: Resaca Operating Company Waterflood Expansion

Terry,

The BLM is objecting to the proposal to expand the waterflood due to previous history with projects operated by Range Operating, OXY and Devon where the injection created multiple problems. In addition, the cementing of these wellbores is questionable and it was similar well cement jobs that created the problems with water flows outside of the proposed injection zone for the other operators.

For your information, the operator has submitted Notice of Stakings on the three Federal wells. I do not know the status of the wells on the Fee leases, but it appears that APDs have been submitted. They did list these wells in their 2011 Unit Plan of Development.

If the operator can satisfy our objections on the waterflood expansion, the BLM will require a CBL to determine the actual cement situation behind the production casing with remedial work to be done as needed. In addition, they will be required to run Casing Integrity Tests.

If the diagrams attached to the proposal are accurate, the BLM will not be able to approve CO2 injection as there are too many possibilities for CO2 to impact other formations.

Also, these wellbores are probably indicative of the condition of the other wells in the field.

Has NMOCD approved the combination of these pools? I know that was a hearing item, but I don't know the outcome.

Please let me know if you have any questions regarding the objection.

Thanks,
Wesley W. Ingram
Supervisory Petroleum Engineer
Bureau of Land Management
575-234-5982
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