

**Goetze, Phillip, EMNRD**

**From:** Swartz, Paul <pswartz@blm.gov>  
**Sent:** Friday, March 24, 2017 8:16 AM  
**To:** Goetze, Phillip, EMNRD; James Glover  
**Subject:** Re: Request for Comments: OCD Case No. 15654

Gentlemen:

While BLM regulations do not address tubing size, 4 1/2" tubing ran in 7 5/8" casing is a prudent condition. The closest BLM guidance is for a minimum of 0.42" centered clearance of casing in open hole. The 5 1/2" casing inside 7 5/8" casing is rather tight 0.41" using flush joint 5 1/2". Moving tubing (at Devonian depths) inside casing that can be expected to be corkscrewed (no drilled hole is vertical) with little centered clearance may encounter substantial difficulty and the loss of beneficial use of the wellbore.

The loss of resistance to flow through increasing tubing I.D. delivers increased wellhead pressure to the formation. There is a concern that for some combinations fracture pressure of a formation will be exceeded. Continual pressure monitoring at the formation is being accomplished for some gas plant residual disposal wells.

pswartz  
575-200-7902

On Thu, Mar 9, 2017 at 5:11 PM, Swartz, Paul <pswartz@blm.gov> wrote:

Would you BLM engineers have thoughts on this? Seems to me the weight due to depth and inability of fishing parted tubing with an overshot (much stronger than an internal catch) would scare operators off.

----- Forwarded message -----

**From:** Goetze, Phillip, EMNRD <Phillip.Goetze@state.nm.us>  
**Date:** Thu, Mar 9, 2017 at 4:30 PM  
**Subject:** Request for Comments: OCD Case No. 15654  
**To:** "Swartz, Paul (pswartz@blm.gov)" <pswartz@blm.gov>, James Glover <jglover@blm.gov>

Gentlemen:

Mesquite has made an application for the March 30<sup>th</sup> Division hearing.

**Case No. 15654: Application of Mesquite SWD, Inc. to Amend Approvals for Salt Water Disposal Wells in Lea and Eddy Counties.** Applicant seeks an order from the Division: Amending Order Numbers SWD-1667 for the San Dunes SWD #2 well, SWD-1642 for the Scott B SWD #1 well, SWD-1638 for the VL SWD #1 well, SWD-1558 for the Station SWD #1 well, SWD-1636 for the Cypress SWD #1 well, SWD-1610 for the Gnome East SWD #1 well, SWD-1602 for the Uber East SWD #1 well, and SWD-1600 for the Uber North SWD #1 well, to allow for injection to occur through internally-coated, 5 1/2 inch or smaller tubing. The orders issued by the Division currently only allow for tubing to be used if its 4 1/2 inches or smaller. The Station SWD #1 well is located approximately 31.7 miles Northwest of Jal, New Mexico. The San Dunes SWD #2, Scott B SWD #1, and Scott B SWD #1 are located within 17 miles of Malaga, New Mexico. The Cypress SWD #1,

Gnome East SWD #1, Uber East SWD #1, and Uber North SWD #1 are located approximately 21 - 37 miles southeast of Carlsbad, New Mexico.

They are attempting to have 5 1/2-inch tubing inside of 7 5/8 casing for a number of their Devonian wells. The actual application with details is attached. Since this may include attempts to have such consideration given to wells with federal APDs, I am requesting the BLM consider this tubing configuration and provide comment on such well construction for disposal permits. Any comments should be sent in correspondence addressed to the Director and should be submitted no later than the 23<sup>rd</sup>. Please forward me a PDF copy of any document that the BLM wishes to be made part of the case record.

Thank you for your time. PRG

Phillip Goetze, PG

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