



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**  
Cabinet Secretary

**Lori Wrotenbery**

Director

**Oil Conservation Division**

December 4, 2003

Mr. Michael Feldewert  
Holland & Hart L.L.P.  
P.O. Box 2208  
Santa Fe, New Mexico 87504-2208

Re: Form C-108 Application  
Mack Energy Corporation  
Federal "18" Well No. 2  
Section 18, T-19S, R-33E, NMPM,  
Lea County, New Mexico

Dear Mr. Feldewert:

On August 29, 2003, Mr. William F. Carr filed a Form C-108 (Application to Inject) on behalf of Mack Energy Corporation for the Federal "18" Well No. 2. By letter dated September 9, 2003, Mr. Carr submitted additional information necessary to process the application. By letter from myself to Mr. Carr dated October 21, 2003, I advised him that I had concerns regarding two plugged and abandoned wells within the "area of review" of the Federal "18" Well No. 2. My concern is that these wells are not plugged sufficiently so as to preclude the migration of injected fluid from the injection interval to the Capitan Reef. In my letter, I gave Mr. Carr the opportunity to submit additional geologic and/or engineering data that would demonstrate that these wellbores would not pose a threat to the Capitan Reef through the proposed injection operations. I further advised him that if no additional data was submitted, an injection permit would be issued for the Federal "18" Well No. 2, with a stipulation that these two "area of review" wells be re-plugged.

As of this date I have not been contacted either by Mr. Carr or by Mack Energy Corporation. In addition, I have reconsidered by earlier position that an injection permit would be issued for this well in the absence of additional evidence. Based upon the data submitted, I do not feel that it is appropriate to issue an injection permit for the well at this time. Consequently, I am returning the application to you unprocessed.

If Mack Energy Corporation wishes to pursue approval of this application, a hearing before a Division examiner will be required.

**RECEIVED**

DEC 05 2003

Holland & Hart L.L.P.  
BEFORE THE OIL CONSERVATION DIVISION

Santa Fe, New Mexico

Case No. 13220 Exhibit No. 2

Submitted by:

**MACK ENERGY CORPORATION**

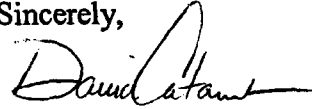
Hearing Date: February 19, 2004

*Mack Energy Corporation  
Application to Inject  
Federal "18" Well No. 2  
December 4, 2003*

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If you should have any questions, please contact me at (505) 476-3466.

Sincerely,



David Catanach  
Engineer

Xc: OCD-Hobbs  
Mack Energy Corporation

# Confirmation Report - Memory Send

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Tel line :  
Name :

Job number : 445  
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To : 5104#44822\*0010#15057462362  
Document pages : 003  
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End time : Dec-05 04:59pm  
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\*\*\* SEND SUCCESSFUL \*\*\*

**HOLLAND & HART.**



Friday, December 5, 2003

To: Ron Lanning  
Mack Energy Corporation  
To:

Fax : (505) 746-2362  
Phone: (505) 748-1288  
Fax :  
Phone:

From: Michael H. Feldewert

Fax : (505) 983-6043  
Phone: (505) 988-4421

Message:

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Attorney Number:	5104	Client/Matter:	44822-0010	Time Deadline:	
Operator Initials:	ilp	Date Transmitted:	12/5/03	Time Transmitted:	

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