

JAMES BRUCE
ATTORNEY AT LAW

POST OFFICE BOX 1056
SANTA FE, NEW MEXICO 87504

SUITE B
612 OLD SANTA FE TRAIL
SANTA FE, NEW MEXICO 87501

(505) 982-2043
(505) 982-2151 (FAX)

March 19, 1998

Hand Delivered

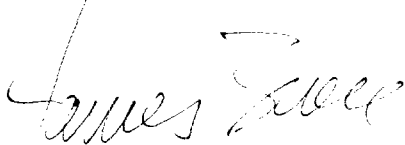
Michael E. Stogner
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Re: Case 11947

Dear Mr. Stogner:

Enclosed (on disk) is Exxon's proposed order. Exxon is interested in commencing injection as soon as possible, so your attention to this matter is greatly appreciated.

Very truly yours, .



James Bruce

Attorney for Exxon Corporation

6

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
DIVISION FOR THE PURPOSE OF
CONSIDERING:

CASE NO. 11947
ORDER NO. R-10736-A

APPLICATION OF EXXON CORPORATION FOR A COOPERATIVE LEASEHOLD
WATERFLOOD PROJECT AND QUALIFICATION OF SAID PROJECT FOR THE
RECOVERED OIL TAX RATE PURSUANT TO THE "NEW MEXICO ENHANCED OIL
RECOVERY ACT", LEA COUNTY, NEW MEXICO.

ORDER OF THE DIVISION

BY THE DIVISION:

This case came on for hearing at 8:15 a.m. on March 19, 1998
at Santa Fe, New Mexico, before Examiner Michael E. Stogner.

NOW, on this _____ day of March, 1998 the Division Director,
having considered the testimony, the record and the recommendations
of the Examiner, and being fully advised in the premises,

FINDS THAT:

(1) Due public notice having been given as required by law,
the Division has jurisdiction of this cause and the subject matter
thereof.

(2) Exxon Corporation ("Exxon") seeks authority to institute
a cooperative leasehold waterflood project within a 640-acre area
comprising all of Section 10, Township 21 South, Range 36 East,
NMPM, Lea County, New Mexico by the injection of water into the Oil
Center-Blinbry Pool through selected perforated intervals from
approximately 5,800 feet to 6,000 feet in the following two wells:

(a) the A. J. Adkins Well No. 11, located in the SE $\frac{1}{4}$ NW $\frac{1}{4}$
(Unit F) of said Section 10; and

(b) the J. D. Knox Well No. 14, located in the NW $\frac{1}{4}$ SE $\frac{1}{4}$
(Unit J) of said Section 10.

(3) The applicant proposed that the project area consist of
the following described fee leases, all in said Section 10:

<u>Lease Name</u>	<u>Acreage</u>	<u>Area</u>
Exxon's J. D. Knox	320	E½
Exxon's A. J. Adkins	300	S ½ N E ¼ N W ¼ , W ½ N W ¼ , S E ¼ N W ¼ , and S W ¼
the A. J. Adkins lease, operated by Texaco Exploration and Production Inc. ("Texaco")	20	N ½ N E ¼ N W ¼

(4) Exxon testified that although Texaco will share in the benefits of the waterflood project, the applicant will bear the full cost of the project.

(5) From testimony presented by the applicant and from Division records cumulative primary oil recovery from the Oil Center-Blinbry Pool encompassing the proposed project area is approximately 1.8 million barrels.

(6) The Oil Center-Blinbry oil production from the proposed project area can be considered to be in an advanced state of depletion and should therefore be properly classified as "stripper production".

(7) Exxon testified that approximately 500,000 barrels of additional incremental oil production is expected to be recovered from the proposed project area by spending an estimated \$1,000,000.00 to drill and complete the two initial injection wells and to recompleate existing wellbores in order to complete an efficient flood pattern with six producing wells within said Section 10.

(8) The proposed waterflood project should result in the recovery of otherwise unrecoverable oil thereby preventing waste, exhibits sound engineering practices, is in the best interest of conservation, and will not impair correlative rights.

(9) The applicant submitted data on the two subject injection wells, water wells in the area, and all other wells (including plugged wells) which penetrate the zone of interest within the 1/2 mile "area-of-review" of the two subject injection wells. This data shows that the wells in the area are cased and plugged so as to protect fresh water and prevent fluid migration from the injection zone, and includes testimony indicating no evidence of open faults or any other hydrologic connection between the injection zone and the fresh water resources in the area.

(10) The operator should take all steps to ensure that the injected water enters only the proposed injection interval and is

not permitted to escape into other formations or onto the surface from injection, production, or plugged and abandoned wells.

(11) Injection into each of the two wells should be accomplished through 2 3/8-inch internally plastic or cement lined tubing installed in a packer set no higher than 100 feet above the top of the upper most perforation; the casing-tubing annulus in each well should be filled with an inert fluid; and a pressure gauge or approved leak-detection device should be attached to the annulus in order to determine leaks in the casing, tubing or packer.

(12) The injection wells or pressurization system for each well should be initially equipped with a pressure control device or acceptable substitute which will limit the surface injection pressure at the wellhead to no more than 0.2 psi per foot of depth to the top most perforation.

(13) Prior to commencing injection operations, the casing in each of the subject wells should be pressure tested throughout the interval, from the surface down to the proposed packer-setting depth, to assure integrity of such casing.

(14) The operator should give advance notice to the supervisor of the Hobbs District Office of the Division of the date and time of the installation of injection equipment and of the mechanical integrity pressure-test in order that the same may be witnessed.

(15) The subject application should be approved and the project should be governed by the provision of Rules 701 through 708 of the Division Rules and Regulations.

(16) The applicant further requests that the subject waterflood project be approved by the Division as a qualified "Enhanced Oil Recovery Project" pursuant to the "Enhanced Oil Recovery Act" (Laws 1992, Chapter 38, Sections 1 through 5).

(17) The evidence presented indicates that the subject waterflood project meets all the criteria for approval.

(18) The approved "project area" should be designated the "*Knox-Adkins Cooperative Leasehold Waterflood Project*" and is to comprise the 640 acres as described above in Finding Paragraph Nos. (2) and (3).

(19) To be eligible for the EOR credit, prior to commencing injection operations, the operator must request from the Division a Certificate of Qualification, which certificate will specify the proposed project area as described above.

(20) At such time as a positive production response occurs and within five years from the date of the Certificate of

Qualification, the applicant must apply to the Division for certification of positive production response, which application shall identify the area actually benefitting from enhanced recovery operations, and identifying the specific wells which the operator believes are eligible for the credit. The Division may review the application administratively or set it for hearing. Based upon evidence presented, the Division will certify to The Department of Taxation and Revenue those lands and wells which are eligible for the credit.

(21) The injection authority granted herein for the injection wells should terminate one year after the effective date of this order if the operator has not commenced injection operations into the subject wells, provided however, the Division, upon written request by the operator, may grant an extension thereof for good cause shown.

IT IS THEREFORE ORDERED THAT:

(1) The applicant, Exxon Corporation ("Exxon"), is hereby authorized to institute a cooperative leasehold waterflood project within a 640-acre area comprising all of Section 10, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico, by the injection of water into the Oil Center-Blinebry Pool through selected perforated intervals from approximately 5,800 feet to 6,000 feet in the following two wells:

- (a) the A. J. Adkins Well No. 11, located in the SE $\frac{1}{4}$ NW $\frac{1}{4}$ (Unit F) of said Section 10; and,
- (b) the J. D. Knox Well No. 14, located in the NW $\frac{1}{4}$ SE $\frac{1}{4}$ (Unit J) of said Section 10.

(2) The subject waterflood project is hereby designated the "*Knox-Adkins Cooperative Leasehold Waterflood Project*".

(3) Exxon, as operator, shall take all steps necessary to ensure that the injected water only enters and remains confined to the proposed injection interval and is not permitted to escape to other formations or onto the surface from injection, production, or plugged and abandoned wells.

(4) Injection shall be accomplished through 2-3/8 inch internally plastic or cement lined tubing installed in a packer set within 100 feet of the uppermost injection perforation; the casing-tubing annulus in each well shall be filled with an inert fluid and equipped with an approved pressure gauge or attention-attracting leak detection device.

(5) The Division Director shall have the authority to administratively authorize an increase in the injection pressure limitation placed upon any well upon a proper showing by the

operator that such higher pressure will not result in the migration of the injected water from its respective interval or fracture the confining strata.

(6) Each injection well or respective pressurization system shall be equipped with a pressure-limiting switch or other acceptable device which will limit the wellhead pressure on the injection well to no more than 1160 psi.

(7) Prior to commencing injection operations, the casing in each injection well shall be pressure-tested throughout the interval from the surface down to the proposed packer setting depth, to assure the integrity of such casing.

(8) The applicant shall immediately notify the supervisor of the Hobbs District Office of the Division of the failure of the tubing, casing or packer in either one of the injection wells, the leakage of water or oil from any plugged and abandoned well within the project area, and shall take such steps as may be timely and necessary to correct such failure or leakage.

(9) Should it become necessary, the supervisor of the Hobbs District Office of the Division or the Director may at any time order a decrease of the injection pressure on any of the subject injection wells.

(10) The operator of the Knox-Adkins Cooperative Leasehold Waterflood Project shall conduct injection operations in accordance with all applicable Division rules, regulations, and policies, including Division General Rules 701 through 708 and shall submit monthly progress reports in accordance with Division General Rules 706 and 1115.

IT IS FURTHER ORDERED THAT:

(11) The subject waterflood project is hereby approved as an "Enhanced Oil Recovery Project" pursuant to the "Enhanced Oil Recovery Act" (Laws 1992, Chapter 38, Sections 1 through 5).

(12) The approved "project area" shall be limited to that 640-acre area described in Decretory Paragraph No. (1) above.

(13) To be eligible for the EOR credit, prior to commencing injection operations, the operator must request from the Division a Certificate of Qualification, which certificate will specify the proposed project area as described above.

(14) At such time as a positive production response occurs and within five years from the date of the Certificate of Qualification, the applicant must apply to the Division for certification of positive production response, which application shall identify the area actually benefitting from enhanced recovery

operations, and identifying the specific wells which the operator believes are eligible for the credit. The Division may review the application administratively or set it for hearing. Based upon evidence presented, the Division will certify to The Department of Taxation and Revenue those lands and wells which are eligible for the credit.

(15) The injection authority granted herein for the proposed injection wells shall terminate one year after the effective date of this order if the operator has not commenced injection operations into the subject wells, provided however, the Division, upon written request by the operator, may grant an extension thereof for good cause shown.

(16) Jurisdiction of this cause is retained for the entry of such further orders as the Division may deem necessary.

DONE at Santa Fe, New Mexico, on the day and year hereinabove designated.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

LORI WROTENBERY
Director

S E A L