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November 9, 1988

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OIL CONSERVATION DIVISION

William J. LeMay, Director Oil Conservation Division New Mexico Department of Energy, Minerals and Natural Resources State Land Office Building Santa Fe, New Mexico 87503

Re: Oil Conservation Division Case No. 9511
In the Matter of the Application of Phillips Petroleum
Company for Salt Water Disposal, Roosevelt County, New
Mexico; Order No. R-8780

Dear Mr. LeMay:

As you may recall prior to the hearing in the above-referenced case Enserch Exploration, Inc. requested a continuance of this case to enable it to prepare for the Examiner hearing. Enserch also advised that if it was unable to obtain a two week continuance, it would have no choice but to request that the matter be heard <u>denovo</u> before the full Commission.

We, therefore, enclose the application of Enserch Exploration, Inc. for hearing <u>de novo</u> in the above-referenced case. Since Enserch owns and operates wells which offset the injection well and are capable of producing from the Fusselman and Montoya formations, we request that this matter be set for hearing before the full Oil Conservation Commission at the earliest possible date.

Mr. William J. LeMay November 9, 1988 Page Two

By copy of this letter I am advising counsel for Phillips Petroleum Company of this application.

Your attention to this matter is appreciated.

WILLIAM F. CARR

Enclosure WFC:mlh

cc w/enc: W. Thomas Kellahin, Esq. W. D. Hendley

Frank Pope

BEFORE THE

OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

NOV 9 Tools

IN THE MATTER OF THE APPLICATION OF PHILLIPS PETROLEUM COMPANY FOR SALT WATER DISPOSAL, ROOSEVELT COUNTY, NEW MEXICO.

OIL CONSERVATION DIVISION

CASE NO. 9511

ORDER NO. R-8780

APPLICATION OF ENSERCH EXPLORATION INC. FOR A DE NOVO HEARING

COMES NOW ENSERCH EXPLORATION, INC. by and through its undersigned attorneys, Campbell & Black, P.A., and pursuant to Section 70-2-13, N.M.S.A., 1978 states that it is a party adversely affected by Division Order R-8780 entered on November 7, 1988 in Case 9511 (Exhibit "A") and accordingly requests that this case be set for a <u>De Novo</u> hearing before the New Mexico Oil Conservation Commission.

Respectfully submitted,

Campbell & BLACK, P.A.

WILLIAM F. CARR

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ATTORNEYS FOR ENSERCH EXPLORATION INC.

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. 9511 ORDER NO. R-8780

APPLICATION OF PHILLIPS PETROLEUM COMPANY FOR SALT WATER DISPOSAL, ROOSEVELT COUNTY, NEW MEXICO

ORDER OF THE DIVISION

EY THE DIVISION:

This cause came on for hearing at 8:15 a.m. on October 26, 1988, at Santa Fe, New Mexico, before Examiner Michael E. Stogner.

NOW, on this 7th day of November, 1988, 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) The applicant, Phillips Petroleum Company, is the owner and operator of the Lambirth "A" Well No. 6, located 1830 feet from the South line and 1980 feet from the East line (Unit J) of Section 30, Township 5 South, Range 33 East, NMPM, Roosevelt County, New Mexico.
- (3) The applicant proposes to utilize said well to dispose of produced salt water into the South Peterson-Fusselman Pool and Montoya formations, with injection into the perforated interval from approximately 7892 feet to 7944 feet.
- (4) The injection should be accomplished through 2 3/8-inch plastic lined tubing installed in a packer set at approximately 7850 feet; the casing-tubing annulus 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 leakage in the casing, tubing or packer.



Case No. 9511 Order No. R-8780 Page No. 2

- (5) Prior to commencing injection operations, the casing in the subject well should be pressure-tested throughout the interval, from the surface down to the proposed packer setting depth, to assure the integrity of such casing.
- (6) The injection well or system should 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 1475 psi.
- (7) The Director of the Division should be authorized to administratively approve an increase in the injection pressure upon a proper showing by the operator that such higher pressure will not result in migration of the injected waters from the Fusselman and Montoya formations.
- (8) The operator should notify the supervisor of the Hobbs district office of the Division of the date and time of the installation of disposal equipment and of the mechanical integrity pressure test in order that the same may be witnessed.
- (9) The operator should 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.
- (10) Approval of the subject application will prevent the drilling of unnecessary wells and otherwise prevent waste and protect correlative rights.

IT IS THEREFORE ORDERED THAT:

(1) The applicant, Phillips Petroleum Company, is hereby authorized to utilize its Lambirth "A" Well No. 6, located 1830 feet from the South line and 1980 feet from the East line (Unit J), Section 30, Township 5 South, Range 33 East, NMPM, Roosevelt County, New Mexico, to dispose of produced salt water into the South Peterson-Fusselman Pool and Montoya formations, injection to be accomplished through 2 3/8-inch tubing installed in a packer set at approximately 7850 feet, with injection into the perforated interval from approximately 7892 feet to 7944 feet.

PROVIDED HOWEVER THAT, the tubing shall be internally plastic-lined; the casing-tubing annulus shall be filled with an inert fluid; and a pressure gauge shall be attached to the annulus or the annulus shall be equipped with an approved leak detection device in order to determine leakage in the casing, tubing, and/or packer.

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PROVIDED FURTHER THAT, prior to commencing injection operations, the casing in the subject well shall be pressuretested to assure the integrity of such casing in a manner that is satisfactory to the supervisor of the Division's district office at Hobbs.

- (2) The injection well or 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 1475 psi.
- (3) The Director of the Division may authorize an increase in the injection pressure upon a proper showing by the operator that such higher pressure will not result in migration of the injected waters from the Fusselman and Montoya formations.
- (4) The operator shall notify the supervisor of the Hobbs district office of the Division of the date and time of the installation of disposal equipment and of the mechanical integrity pressure test in order that the same may be witnessed.
- (5) The operator shall immediately notify the supervisor of the Division's Hobbs district office of the failure of the tubing, casing or packer in said well or the leakage of water from or around said well and shall take such steps as may be timely and necessary to correct such failure or leakage.
- (6) The applicant shall conduct disposal operations and submit monthly reports in accordance with Rules 702, 703, 704, 705, 706, 708 and 1120 of the Division Rules and Regulations.
- (7) 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

WILLIAM J. LEMAY

Director

SEAL