

Brown, Maxey G, EMNRD

30-025-31515

From: Goetze, Phillip, EMNRD
Sent: Thursday, April 23, 2015 2:41 PM
To: Brown, Maxey G, EMNRD
Cc: Sanchez, Daniel J., EMNRD; Catanach, David, EMNRD; Jones, William V, EMNRD; McMillan, Michael, EMNRD
Subject: RE: Tubing size

Maxey:

After discussion and since the Hobbs folks do compliance so much better than us technocrats at the higher elevation of Santa Fe, the process will be:

1. Notify the operator that the authority under IPI order (IPI-479 for 2260 psi) is suspended since the order states approval of the IPI is based on tubing size not changing (specifically tubing size being increased) and that the well may continue to inject under the original injection order Amended SWD-486 with the administrative gradient of 0.2 psi per foot to top of open-hole (or 969 psi).
2. If the operator wishes to utilize IPI-479, then the size of tubing used for the step-rate test shall be installed; or the operator can apply for a new IPI order following a step-rate test conducted with the larger tubing in place.

You can then have them call Santa Fe with any questions or comments of concern – either Daniel or me. I also have concerns for this well since it is an open-hole completion in the Delaware Mountain group which was expanded from a 100-foot interval to over 1300 feet under the amended order mixed with some Bone Spring development in the township. PRG

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