## Jones, William V., EMNRD

From:	Jones, William V., EMNRD
Sent:	Tuesday, September 28, 2010 11:49 AM
То:	'danjei08@yahoo.com'
Cc:	Warnell, Terry G, EMNRD; Gonzales, Elidio L, EMNRD; Sanchez, Daniel J., EMNRD
Subject:	Disposal application from DC Energy LLC: Crosby Deep #2 30-025-24287 San Andres formation from 3750 to 4600 feet
Attachments:	CrosbyDeep2_SanAndresApplication.xlsx

Hello Dan:

I looked over this application and it appears the cement is not high enough in offset well: Crosby Deep #1. The records I found indicate cement is at either 5710 or 6777 feet which would leave the intended disposal interval unprotected from those depths to the intermediate casing shoe and above to the surface. I am not permitted to leave bradenheads exposed in Area of Review wells when evaluating SWD applications. If this cement top is not as stated, let me know.

Until then, this application must be denied.

For your info, listing below the other items noticed while looking this over. These would also have to be addressed prior to approval:

- a. Please send a copy of the CBL on the Crosby Deep #2 to the Hobbs district office for scanning into the well file I know you ran one, but can't find it in the OCD file.
- b. Please send wellbore diagrams of all wells in the attached EXCEL file showing placement of cement over the San Andres intended disposal interval. You sent some wellbore diagrams on some plugged wells, but no cement data on the Active or TAed wells. Wellbore diagrams on all these wells in the attachment would cover this requirement.
- c. Send a "before conversion" wellbore diagram on the subject well.
- d. What is the range of intended perforations in the San Andres. I read that 3750 to 4600 was the target, but the packer setting depth was deeper than 3750, so I must be sure what you want to do.
- e. Newspaper notice you said this was in the mail.
- f. This would be a commercial disposal well, but we need to know what are the formations that will be supplying water to this disposal well and a water analysis for each one as soon as it is available.
- g. The affirmative statement needs to be done specifically for this application.
- h. The surface owner seems to know you want to use this well for disposal and is OK with it. But since the disposal interval has changed to the San Andres from the Fusselman, all parties which should be "noticed" should get a copy of the new application:
  - a. Surface owner
  - b. San Andres Mineral owner in Unit Letter E of offset Section 34 who is this?
  - c. San Andres Mineral owner in Unit Letters N, O, and P of offset Section 28 who are these?
  - d. Does DC Energy LLC own the San Andres minerals in all of Section 33?
  - e. The attached Area of Review listing shows all wells within ½ mile that penetrate at least the top of the San Andres. This listing is from OCD records and shows Herman L. Loeb LLC and BC&D Operating Inc. still are operator of record for wells in the AOR must send them notice.

Regards,

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