2040 South Pacheco Street

Santa Fe, New Mexico 87505

February 5, 1998

Pioneer Natural Resources USA, Inc. P. O. Box 3178
Midland, Texas 79702-3178

Attention:

Scott H. Lackey

Sr. Operations Engineer

Re:

Administrative application for waterflood expansion pursuant to Division General Rules 701.G(6) and 701.C for the Lusk West (Delaware) Unit Waterflood Project in Sections 20, 21, and 29, Township 19 South, Range 32 East, NMPM, designated and Undesignated West Lusk-Delaware Pool, Lusk West (Delaware) Unit, Lea County, New Mexico.

Dear Mr. Lackey:

I am in receipt of your applications dated December 9, 1997 and January 15 and 26, 1998 to expand the subject waterflood project which was the subject of Division Order No. R-10863, issued in Case 11704 and dated August 28, 1997, by including the following described 4 wells as water injectors in Township 19 South, Range 32 East, NMPM, Lea County, New Mexico:

Well Name and Number	API Number	Footage Location	Unit	Section	Injection Interval (feet)	Type of Well
West Lusk Delaware Unit Well No. 903 (filed as the Southern California Federal Well	30-025-34172	990' FNL & 1880' FWL	С	29	6434-6443	New Drill
West Lusk Delaware Unit Well No. 11 (filed as the Lusk Deep Unit "A" Well No. 23)	30-025-34173	1980' FS & WL	К	20	6445-6457	New Drill
Lusk West Delaware Unit Well No. 909	N/A	1980' FSL & 940' FEL	I	29	6452-6464	New Drill
Lusk West Delaware Unit Well No. 915-Y	N/A	450' FSL & 2050' FEL	0	29	6448-6455	New Drill

Said Division Order No. R-10863 included provisions postponing water injection into the subject waterflood project until such time as eight certain existing wellbores (2 producing wells and 6 plugged and abandoned wells), see Decretory Paragraphs (4) and (5) of said Order for

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further detail, see copy attached. What is the current status of the eight wells covered by these directives? Further, please provide me with a detailed report of the work preformed by or the studies done by Parker & Parsley Development, L.P./Pioneer Natural Resources USA, Inc. In cooperation with the Division's District Office in Hobbs to satisfactorily comply with those stipulations?

It would also appear that two of the proposed wells in the immediate applications are replacements for two wells previously authorized by said Order No. R-10863:

- (1) the Lusk West Delaware Unit Well No. 909 for the Southern California Federal Well No. 4 (API No. 30-025-20877) in Unit "I" of said Section 29; and,
- (2) the Lusk West Delaware Unit Well No. 915-Y for the Southern California Federal Well No. 12 in Unit "O" of said Section 29.

What is the current status of and the future plans for these two older Southern California Federal No. 4 and 12 wells? Did their configurations change any since the issuance of said Order No. R-10863? Not mentioned in the application for the No. 915-Y is the current status, configuration, and plans for the Lusk West Delaware Unit Well No. 915 (API No. 30-025-34130), located 450 feet from the South line and 2000 feet from the East line (Unit O) of said Section 29?

To complete my review of these applications the Division further requires:

- (1) Information on the well in Unit "L" of said Section 20 indicated on the map as the Lusk Deep Unit "A" Well No. 7;
- Additional data and/or a detailed explanation showing that injected water into the proposed Lusk West Delaware Unit Well No. 903 will remain confined in the narrow injection interval. The well in Unit "A" of Section 30, Township 19 South, Range 32 East, NMPM, Lea County, New Mexico in within the ½ mile area of review ("AOR") of the proposed Lusk West Delaware Unit Well No. 903 and the information provided me indicates that there is no cement protection behind pipe within the proposed injection interval;
- (3) Since the information provided by Parker & Parsley

Development, L.P. at the time of the hearing is now at least one year old (February 6, 1997), up dated and current information is essential in matters concerning water injection; therefore, Pioneer Natural Resources USA, Inc. needs to indicate any and all: new drills, recompletions, workovers, name/number changes, wellbore configurations, etc. on all wells within each of the four subject well's ½ mile AOR; and,

(4) Please submit a supplemental land plat to support the notification for each of the four proposed injection wells (i.e. - please match those parties that were provided notice with the corresponding acreage and/or owned).

Should you have any questions concerning this matter, please contact me in Santa Fe at (505) 827-8185.

Sincerely,

Michael E. Stogner

Chief Hearing Officer/Engineer

cc: New Mexico Oil Conservation Division - Hobbs

U. S. Bureau of Land Management - Roswell

Conrad Coffield (Legal Counsel Representing Parker & Parsley Development, L.P. in Case 11704) - Santa Fe

Ben Stone, NMOCD - Santa Fe

File: Case 11704