

From: [Goetze, Phillip, EMNRD](#)
To: [Harris, Anthony, EMNRD](#); [Gebremichael, Million, EMNRD](#)
Subject: RE: Current Status: NOI for the Sand 18 Fed 1 SWD [Action ID: 248703]
Date: Wednesday, September 13, 2023 11:14:28 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Thank you Tony. If Million returns, we should have a group discussion on Monday (or Tuesday) and render a final decision. PRG

From: Harris, Anthony, EMNRD <Anthony.Harris@emnrd.nm.gov>
Sent: Wednesday, September 13, 2023 10:51 AM
To: Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>; Gebremichael, Million, EMNRD <Million.Gebremichael@emnrd.nm.gov>
Subject: RE: Current Status: NOI for the Sand 18 Fed 1 SWD [Action ID: 248703]

Good morning

A couple comments / observations:

1. After pulling the tubing, they plan to run a 4-5/8" bit and 5.5" casing scraper to OH PBTD at 18,000 ft (ie. Note 5.5" casing shoe is at 16,700 ft).
 - a. ID of 5.5" 20# casing is 4.778" with Drift ID = 4.653"
 - b. Assuming that run (ie. 4.625" bit) is completed successfully, running the 4" tubing should not pose any issues.

With respect to running 3.5" vs 4.0" tubing:

1. I'm assuming the recommended guideline to run 3.5" inside 5.5" was adopted based upon issues encountered in the past with overshot limitations?
 - a. That constraint should only arise if fishing was required to retrieve parted 4" pipe.
 - b. If we highlight that issue to Devon, and they are willing to accept that risk, I don't see a compelling reason not to run the 4".

Regards

Tony

From: Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>
Sent: Tuesday, September 12, 2023 9:06 PM
To: Gebremichael, Million, EMNRD <Million.Gebremichael@emnrd.nm.gov>
Cc: Harris, Anthony, EMNRD <Anthony.Harris@emnrd.nm.gov>
Subject: FW: Current Status: NOI for the Sand 18 Fed 1 SWD [Action ID: 248703]

Updated the SWD order imaging to have a copy of the hearing order. You are correct that the hearing order has 3.5-inch. See attached guidance and comment when you have time. PRG

From: Goetze, Phillip, EMNRD
Sent: Tuesday, September 12, 2023 3:57 PM
To: Gebremichael, Million, EMNRD <Million.Gebremichael@emnrd.nm.gov>
Cc: Harris, Anthony, EMNRD <Anthony.Harris@emnrd.nm.gov>
Subject: FW: Current Status: NOI for the Sand 18 Fed 1 SWD [Action ID: 248703]

I will need to track down the UIC permit for this and make a chronology. SWD-2218 appears only to be an application but the image file shows an approved order date of 6/9/2020. This application was protested, but there is no record of the protest being withdrawn. So, don't approve the NOI until I have some time this week to sort this one out. Meanwhile, enjoy Tampa. PRG

From: Goetze, Phillip, EMNRD
Sent: Tuesday, September 12, 2023 11:49 AM
To: Green, Chelsey <Chelsey.Green@dyn.com>
Cc: Gebremichael, Million, EMNRD <Million.Gebremichael@emnrd.nm.gov>; Chavez, Carl, EMNRD <CarlJ.Chavez@emnrd.nm.gov>; Wrinkle, Justin, EMNRD <Justin.Wrinkle@emnrd.nm.gov>
Subject: Current Status: NOI for the Sand 18 Fed 1 SWD [Action ID: 248703]

Chelsey:

Million and I will be discussing the proposed actions for the identified NOI this week. At this time, Million is attending the GWPC and I am reviewing his recommendations with the intent to have this item resolved shortly. As to the referenced citation on Minor Modification, UIC Permit Section H.4.a.iii (as found in 40 CFR 144.11) is a determination for a requirement of notice. You are correct that the NOI could be approved administratively, but the modification of the tubing set is being considered an alteration (as found in 40 CFR 144.39(a)(1)) of the permit and is being considered in relation to its operational history and the content of the C-108 as approved under SWD-1427. Thank you for your inquiry on its status. PRG

From: Green, Chelsey <Chelsey.Green@dvn.com>

Sent: Monday, September 11, 2023 12:47 PM

To: Gebremichael, Million, EMNRD <Million.Gebremichael@emnrd.nm.gov>; Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>; Chavez, Carl, EMNRD <Carlj.Chavez@emnrd.nm.gov>

Cc: Harrison, John, EMNRD <John.Harrison@emnrd.nm.gov>

Subject: RE: [EXTERNAL] Sand 18 Fed 1 SWD_Action ID: 248703

Good afternoon,

I am following up to see if we have an estimated timeframe on the subject sundry?

Thank you,

Chelsey Green

Regulatory Compliance Professional

Devon Energy Production Co, L.P.
333 W. Sheridan Ave.
Oklahoma City, OK 73102
(405) 228-8595

From: Green, Chelsey

Sent: Friday, September 1, 2023 1:08 PM

To: Gebremichael, Million, EMNRD <Million.Gebremichael@emnrd.nm.gov>; Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>; Chavez, Carl, EMNRD <Carlj.Chavez@emnrd.nm.gov>

Cc: Harrison, John, EMNRD <John.Harrison@emnrd.nm.gov>

Subject: RE: [EXTERNAL] Sand 18 Fed 1 SWD_Action ID: 224460

Mr. Gebremichael,

The Sand 18 Fed 1 SWD sundry was resubmitted after the additional request had been completed based on the 224460 rejection. The new sundry id is 248703. I wanted to check on this sundry and see if we had an estimated time of review? Please let me know if anything additional is needed.

Thank you,

Chelsey Green

Regulatory Compliance Professional

Devon Energy Production Co, L.P.
333 W. Sheridan Ave.
Oklahoma City, OK 73102
(405) 228-8595

From: Gebremichael, Million, EMNRD <Million.Gebremichael@emnrd.nm.gov>

Sent: Monday, June 12, 2023 5:42 PM

To: Green, Chelsey <Chelsey.Green@dvn.com>; Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>; Chavez, Carl, EMNRD <Carlj.Chavez@emnrd.nm.gov>

Cc: Harrison, John, EMNRD <John.Harrison@emnrd.nm.gov>

Subject: RE: [EXTERNAL] Sand 18 Fed 1 SWD_Action ID: 224460

The API in our record is "30-025-25017 SAND 18 FEDERAL #001 [325480]" and the API in your application is as pasted below.



Sand 18 Federal 1 SWD - General Repair Procedure

5/31/2023

Well Name: Sand 18 Fed 1 SWD
Location: 1,180' FNL, 660' FEL, Sec. 4-T23S-R32E

API: 30-015-32274
County: Lea, NM

And the sundry submitted was for casing leak repair – the tubing change plan was written in the detailed program. Please resubmit a new NOI titled casing repair and tubing upsize and also please rectify the API mismatch.

Thank you,

Million Gebremichael

Petroleum Specialist- A
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
Cell : 505-4791137



From: Green, Chelsey <Chelsey.Green@dvn.com>

Sent: Monday, June 12, 2023 4:06 PM

To: Gebremichael, Million, EMNRD <Million.Gebremichael@emnrd.nm.gov>; Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>; Chavez, Carl, EMNRD <CarlJ.Chavez@emnrd.nm.gov>

Cc: Harrison, John, EMNRD <John.Harrison@emnrd.nm.gov>

Subject: RE: [EXTERNAL] Sand 18 Fed 1 SWD_Action ID: 224460

To Whom it May Concern,

Devon recently had the below application rejected due to the outside diameter tubing size changing to 4 inch from 3 ½ inch, the latter being stipulated in Order SWD -1481.

Devon feels this change to 4 inch OD tubing would fall under section H.4.a.iii of the Division's UIC guidance (dated Dec. 18, 2020) as a Minor Modification and hopes we can proceed with approval administratively. The relevant portion of section H.4.a.iii is copied below:

4. Permittee Request to Modify Permit. Permittee may apply to modify the terms of this Permit.

a. **Minor Modifications.** OCD may make a minor modification to this Permit without notice and an opportunity for hearing for:

- i. Non-substantive changes such as correction of typographical errors;
- ii. Requirements for more frequent monitoring or reporting;
- iii. Changes to the Well construction requirements provided that any alteration shall comply with the conditions of the

Permit and does not change the Area of Review considered in the application for the Permit;

- iv. Amendments to the plugging and abandonment plan;
- v. Changes in the types of fluids injected which are consistent with sources listed in the application for the Permit and do not change the classification of the Well;
- vi. Corrections of the actual injection interval if within the approved formation; or
- vii. Transfer of a Permit for a Well that has been spud. [40 CFR 144.41]

b. **Major Modifications.** OCD shall require notice and an opportunity for hearing for any modification that is not minor. For such modifications, Permittee shall submit Form C-108 and comply with the notice requirements of 19.15.26 NMAC

The proposed change to 4 inch OD injection tubing will not affect the permitted maximum injection rate, permitted maximum surface injection pressure, AOR, nor any other permit conditions. The increase in tubing size would strictly reduce pipe friction pressure.

Additionally, this would allow our pumps to run in the manufacturer-recommended pump curve preventing damage to the equipment reducing potential environmental impact. As an added measure to remain within the conditions of the permit, maximum injection rate and maximum surface injection pressure controls are programmed into the control logic to prevent exceeding the permitted parameters. Standard fishing/spear tools will allow the tubing to be extracted, if necessary.

If you require additional information or have any questions, please do not hesitate to reach out. Hopefully this context provides the necessary justification for a Minor Modification and we are able to proceed with the attached plan.

Thank you,
Chelsey Green
Regulatory Compliance Professional

Devon Energy Production Co, L.P.
333 W. Sheridan Ave.
Oklahoma City, OK 73102
(405) 228-8595

From: Gebremichael, Million, EMNRD <Million.Gebremichael@emnrd.nm.gov>

Sent: Tuesday, June 6, 2023 2:52 PM

To: Harrison, John, EMNRD <John.Harrison@emnrd.nm.gov>; Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>; Green, Chelsey <Chelsey.Green@dyn.com>

Cc: Chavez, Carl, EMNRD <Carl.Chavez@emnrd.nm.gov>

Subject: RE: [EXTERNAL] Sand 18 Fed 1 SWD_Action ID: 224460

The Sundry note was rejected due to the following reasons:

- API on the application is not same as the API in OCD's record.
- The tubing size stipulated in Order SWD -1481 is 3 1/2 " and after remediation work, only same size tubing could be replaced.

Should you have any question, please don't hesitate to reach out to UIC group.

Thanks,

Million Gebremichael

Petroleum Specialist-A
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
Cell : 505-4791137



From: Harrison, John, EMNRD <John.Harrison@emnrd.nm.gov>
Sent: Tuesday, June 6, 2023 1:26 PM
To: Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>
Cc: Gebremichael, Million, EMNRD <Million.Gebremichael@emnrd.nm.gov>; Chavez, Carl, EMNRD <Carlj.Chavez@emnrd.nm.gov>
Subject: FW: [EXTERNAL] Sand 18 Fed 1 SWD_Action ID: 224460

Please see below...

Regards,

John Harrison

Oil Conservation Division
1625 N. French Dr.
Hobbs, New Mexico 88240



From: Green, Chelsey <Chelsey.Green@devon.com>
Sent: Tuesday, June 6, 2023 12:03 PM
To: Harrison, John, EMNRD <John.Harrison@emnrd.nm.gov>
Subject: [EXTERNAL] Sand 18 Fed 1 SWD_Action ID: 224460

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Hi John,

I just submitted the subject sundry for workover operations on a SWD that is on a tight time frame. Can you please look at this for approval? If I need to send this to someone else since it is a SWD please let me know.

Thank you,

Chelsey Green

Regulatory Compliance Professional

Devon Energy Production Co, L.P.
333 W. Sheridan Ave.
Oklahoma City, OK 73102
(405) 228-8595

Confidentiality Warning: This message and any attachments are intended only for the use of the intended recipient(s), are confidential, and may be privileged. If you are not the intended recipient, you are hereby notified that any review, retransmission, conversion to hard copy, copying, circulation or other use of all or any portion of this message and any attachments is strictly prohibited. If you are

not the intended recipient, please notify the sender immediately by return e-mail, and delete this message and any attachments from your system.

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 267171

CONDITIONS

| | |
|---|--|
| Operator: STRATA PRODUCTION CO P.O. Box 1030 Roswell, NM 882021030 | OGRID: 21712 |
| | Action Number: 267171 |
| | Action Type: [IM-SD] Admin Order Support Doc (ENG) (IM-AAO) |

CONDITIONS

| Created By | Condition | Condition Date |
|---------------|-----------|----------------|
| mgebremichael | None | 9/19/2023 |