Additional Information

Inactive Well Status
Raybaw Regulator 29
SWD-2607

Harris, Anthony, EMNRD

Nancy Winn (nwinn@sbcg bal.net); Tom Campbell; Goetze, Phillip, EMNRD; Gebremichael, Million, EMNRD; "nate

[EXTERNAL] RE: Raybaw Regulator 29 SWD#1 API 30-015-41034 - Inactive well non compliance as of June 10, 2024 Wednesday, June 19, 2024 8:19:49 AM

image001.png

C-103U Subsequent TA Sundry Pearson SWD 1 05-10-2024 Approved .pdf Inactive Well List Excludes TA Wells (15 mos) As of 06-19-2024.pdf

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

Good morning.

Raybaw Operating appreciates the assistance of OCD to reduce the number of wells on the inactive list to five with the recognized change of status to TA of the Pearson #1 SWD. This well's status change was filed on 5/9/2024 and approved 6/18/2024. The current OCD list of inactive wells is attached for your verification review. Following your review of the Inactive wells and if you concur in this respect with Raybaw Operating being in compliance, respectfully requested is your continued processing of the Application for Reauthorizing the Injection Permit for the Regulator 29 SWD #1.

Upon a finding by you that the permit for this well is approved Raybaw plans to expedite bringing the well back to active service. This action will also have the effect of taking it off the inactive well list in the continuance of addressing compliance standards. Please let me know if I can in any additional way, either by data transmission or other input, facilitate the application review. Again thank you for your time and direction in moving the application forward.

Jack M Carter Manager Carbon Energy Partners 171 Waterfront Drive Montgomery, Texas 77356 Ph: 281-387-6515 Email: imcarter2@sbcglobal.net

From: Jack Carter **Sent:** Monday, June 10, 2024 2:23 PM **To:** Harris, Anthony, EMNRD

Cc: Nancy Winn (nwinn@sbcglobal.net); Tom Campbell; Goetze, Phillip, EMNRD; Gebremichael, Million, EMNRD; 'nate.alleman@aceadvisors.com'

Subject: RE: Raybaw Regulator 29 SWD#1 API 30-015-41034 - Inactive well non compliance as of June 10, 2024

Appreciate your continued review. I will look into this new wrinkle and see how we can resolve.

Thank you

From: Harris, Anthony, EMNRD [mailto:Anthony.Harris@emnrd.nm.gov] Sent: Monday, June 10, 2024 2:21 PM

To: Jack Carter

Cc: Nancy Winn (nwinn@sbcglobal.net); Tom Campbell; Goetze, Phillip, EMNRD; Gebremichael, Million, EMNRD; 'nate.alleman@aceadvisors.com'
Subject: Raybaw Regulator 29 SWD#1 API 30-015-41034 - Inactive well non compliance as of June 10, 2024

Importance: High

Good Afternoon, Jack

During the review of your SWD application for Regulator 29, it was noted that Raybaw recently had another well move into the Inactive category, bringing your inactive well count up to 6. See snapshot below for details.



Please take the necessary action(s) to resolve the non-compliance issue, and please notify me once compliance has been achieved.

Regards

Tony Harris

Petroleum Specialist

Anthony.harris@emnrd.nm.gov

505 549 8131.



From: Jack Carter < jack@oaknrg.com>

Sent: Sunday, June 2, 2024 7:36 PM

To: Harris, Anthony, EMNRD < Anthony. Harris@emnrd.nm.gov>

Cc: Nancy Winn (nwinn@sbcglobal.net) <nwinn@sbcglobal.net>; Tom Campbell <tom@oaknrg.com>; Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>; Gebremichael, Million,

EMNRD < Million.Gebremichael@emnrd.nm.gov>; 'nate.alleman@aceadvisors.com' < nate.alleman@aceadvisors.com Subject: [EXTERNAL] RE: Raybaw Regulator 29 SWD#1 API 30-015-41034 - Inactive well non compliance

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

Good morning.

Raybaw Operating appreciates the assistance of OCD to reduce the number of wells on the inactive list to five with the recognized plugging of the Carlsbad 13 Com #001. The current OCD list of inactive wells is attached for your verification review. Following your review of the Inactive wells and if you concur in this respect with Raybaw Operating being in compliance, respectfully requested is your continued processing of the Application for Reauthorizing the Injection Permit for the Regulator 29 SWD #1.

Upon a finding by you that the permit for this well is approved Raybaw plans to expedite bringing the well back to active service. This action will also have the effect of taking it off the inactive well list in the continuance of addressing compliance standards. Please let me know if I can in any additional way, either by data transmission or other input, facilitate the application review. Again thank you for your time and direction in moving the application forward.

Jack

Jack M Carter

Manager

Carbon Energy Partners

171 Waterfront Drive

Montgomery, Texas 77356

Ph: 281-387-6515

Email: imcarter2@sbcglobal.net

From: Harris, Anthony, EMNRD [mailto:Anthony.Harris@emnrd.nm.gov]

Sent: Thursday, May 9, 2024 2:46 PM To: Jack Carter

Cc: Nancy Winn (nwinn@sbcglobal.net); Tom Campbell; Goetze, Phillip, EMNRD; Gebremichael, Million, EMNRD; 'nate.alleman@aceadvisors.com'
Subject: Raybaw Regulator 29 SWD#1 API 30-015-41034 - Inactive well non compliance
Importance: High

Good Afternoon, Jack

During the review process of your application, it is noted that Raybaw is non-compliant with Section 19.15.5.9.4 NMAC with respect to Inactive wells. Refer to snapshots below for details.

```
IANCE:

Tota is in compliance with Subsection A of 19.15.59 NMAC (if the operator:
currently meets the financial assurance requirements of 19.15.8 NMAC.

is not subject to a division or commission order, issued after notice and bearing, finding the operator to be in violation of an order requiring corrective action;

does not have a penalty assessment that is unopul more than the John apply assessment that is unopul more than the John apply assessment that is unopul more than the following number of wells out of compliance with 19.15.25.8 NMAC and imposing sanctions if the schedule is not mee
than the following number of wells out of compliance with 19.15.25.8 NMAC and imposing sanctions if the schedule is not mee
than the following number of wells out of compliance with 19.15.25.8 NMAC and imposing sanctions if the schedule is not mee
than the following number of wells out of compliance with 19.15.25.8 NMAC and imposing sanctions if the schedule is not mee
than the following number of wells out of compliance with 19.15.25.8 NMAC and imposing sanctions if the schedule is not mee
than the following number of wells out of compliance with 19.15.25.8 NMAC and imposing sanctions if the schedule is not mee
than the following number of wells out of compliance with 19.15.25.8 NMAC and imposing sanctions if the schedule is not mee
than the following number of wells out of compliance with 19.15.25.8 NMAC and imposing sanctions if the schedule is not mee
than the following number of wells out of compliance with 19.15.25.8 NMAC and imposing sanctions if the schedule is not mee
than the following number of wells out of compliance with 19.15.25.8 NMAC and imposing sanctions if the schedule is not mee
than the following number of wells out of compliance with 19.15.25.8 NMAC and imposing sanctions if the schedule is not mee
than the following number of wells out of compliance with 19.15.25.8 NMAC and imposing sanctions if the schedule is not mee
than the following number of wells out of compliance with 19.15.25.8 NMAC and impo
    19.15.5.9
A
                                                                                                                                                             COMPLIANCE:
B. Inactive wells.

(1) The division shall make available on its website, and update daily, an "inactive well list" latting each well, by operator, that according to division records:
(a) thown so production or injection for past 15 months.
(b) does not have twell below polguegie in accordance with 19.15.25 9 NMAC through 19.15.25.11 NMAC,
(c) in not in approved temporary abundonment in accordance with 19.15.25 12 NMAC through 19.15.25 14 NMAC, and
(d) in not subspect to an agreed compliance of land order setting a schedule for bringing he well into compliance with 19.15.25 18 NMAC.
(2) A well inactive for more than 15 months creates a rebuttable presumption that the well is our of compliance with 19.15.25 8 NMAC.
(C) Financial assurance. The divisions half make available on its website and update weekly the status of operators "financial assurance that 19.15 8 NMAC requires, according to divisions of the compliance of the compliance
```



If there is something I have mis-interpreted, or if you have an Agreed Compliance Order in place, please advise ASAP.

In the meantime, we cannot process your application until this issue is resolved.

Regards Tony Harris Petroleum Specialist Anthony.harris@emnrd.nm.gov 505 549 8131.



From: Jack Carter < jack@oaknrg.com>

Sent: Thursday, April 25, 2024 12:37 PM

To: Harris, Anthony, EMNRD < Anthony. Harris@emnrd.nm.gov>

Cc: Nancy Winn (nwinn@sbcglobal.net) <nwinn@sbcglobal.net); Tom Campbell <tom@oaknrg.com>; Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>; Gebremichael, Million,

Subject: RE: [EXTERNAL] RE: Inj Permit: Raybah Regulator 29 SWD#1 API 30-015-41034

Good afternoon. Please find attached the additional information requested (per directive email of 2/20/2024 and 2/28/2024) on Raybaw Operating, LLC's C-108 application for reauthorization of produced water disposal into the Raybaw Operating Regulator 29 SWD #1 (30-015-41034). I regret the time delay in providing the material. The services of ACE Energy Advisors were instrumental in helping us address several of the issues. Appreciate your proceeding with the review of our request under the existing application. Please don't hesitate $to \ \ contact \ me \ if \ additional \ information \ is \ necessary \ to \ complete \ the \ re-authorization. \ Thank \ you \ for \ your \ time.$

Flint Oak Energy/Raybaw Operating VP Land/Advisor 21123 Eva Street, Suite 200 Montgomery, Texas 77356

Direct Phone: 281-387-6515

From: Harris, Anthony, EMNRD [mailto:Anthony.Harris@emnrd.nm.gov]
Sent: Wednesday, February 28, 2024 4:39 PM
To: Jack Carter

Cc: Nancy Winn (nwinn@sbcglobal.net); Tom Campbell; Goetze, Phillip, EMNRD; Gebremichael, Million, EMNRD Subject: RE: [EXTERNAL] RE: Inj Permit: Raybah Regulator 29 SWD#1 API 30-015-41034

Hi Jack

I checked the system and noted that the C-108 was submitted. So it should not be necessary to re-submit.

For the items outlined in my Feb 20 e-mail (see snapshot below), I suggest compiling all items into a single document and send it via e-mail. We will then incorporate it with your existing application and proceed with our review

- 1. A new permit must be obtained.
 - a. Please submit a revised C-108 (ie. incorporating the additional items listed below) via the e-permitting portal
- 2. For Devonian wells, the Area of Review (AOR) must be 1 mile.
 - a. Please update the application (C-108 item VI) to include all wells within 1 mile.
 - b. Proof of Notice (C-108 item XIII) must also be revised to one mile
- 3. Include a chemical analysis for fresh water wells within the 1 mile AOR (C-108 Item XI)
 - a. Cursory review shows multiple water wells (RA 04160, RA08976,RA02786,RA13336 and RA13308) within a 1 mile radius
- 4. Further to item 3, an affirmative statement (C-108 item XII) by qualified professional is required
- 5. The subject well is completed in the Devonian and is approximately 4 miles North-East of a Magnitude 3.3 Seismic event.
 - a. An assessment of potential for Induced Seismicity mut be included with the application
 - b. Refer to attached example that can be used as a guideline

Best Regards

Regards Tony Harris Petroleum Specialist Anthony.harris@emnrd.nm.gov 505 549 8131.



From: Jack Carter < iack@oaknrg.com>

Sent: Wednesday, February 28, 2024 2:38 PM

To: Harris, Anthony, EMNRD < Anthony. Harris@emnrd.nm.gov >

Cc: Nancy Winn (nwinn@sbcglobal.net) <nwinn@sbcglobal.net>; Tom Campbell <tom@oaknrg.com>; Goetze, Phillip, EMNRD <phillip,goetze@emnrd.nm.gov>; Gebremichael, Million,

EMNRD < Million.Gebremichael@emnrd.nm.gov>

Subject: RE: [EXTERNAL] RE: Inj Permit: Raybah Regulator 29 SWD#1 API 30-015-41034

Appreciate your taking the time to evaluate and review.

Thank you

From: Harris, Anthony, EMNRD [mailto:Anthony.Harris@emnrd.nm.gov]

Sent: Wednesday, February 28, 2024 3:36 PM

To: Jack Carter

Cc: Nancy Winn (nwinn@sbcglobal.net); Tom Campbell; Goetze, Phillip, EMNRD; Gebremichael, Million, EMNRD Subject: RE: [EXTERNAL] RE: Inj Permit: Raybah Regulator 29 SWD#1 API 30-015-41034

Good Afternoon, Jack

Please allow some time for me to check /confirm and I will get back to you. Our UIC group is out of the office this week, so please bear me and I will get back to you ASAP with a definitive answer.

Regards

Tony

From: Jack Carter < jack@oaknrg.com>

Sent: Wednesday, February 28, 2024 2:07 PM

To: Harris, Anthony, EMNRD < Anthony, Harris@emnrd.nm.gov>

 $\textbf{Cc:} \ Nancy \ Winn \ (\underline{nwinn@sbcglobal.net}) < \underline{nwinn@sbcglobal.net} > ; Tom \ Campbell \\ < \underline{tom@oaknrg.com} > ; Goetze, Phillip, EMNRD \\ < \underline{phillip.goetze@emnrd.nm.gov} > ; Gebremichael, Million, \\ < \underline{phillip.goetze@emnrd.nm.gov} > ; Gebremichael, \\ < \underline{phill$

EMNRD < Million.Gebremichael@emnrd.nm.gov>

Subject: RE: [EXTERNAL] RE: Inj Permit: Raybah Regulator 29 SWD#1 API 30-015-41034

Good afternoon. I believe I may have been unclear in my question. Raybaw filed a new application for the Regulator 29 SWD #1 on January 31, 2024. Certain deficiencies were noted in the filing and stated were requirements that need to be met. Instead of filing for a New Permit and paying an additional Permit fee, May we not work with you to submit the requested additional material and revised exhibits under the existing permit filed in January 2024?

Thanks

From: Harris, Anthony, EMNRD [mailto:Anthony,Harris@emnrd.nm.gov]
Sent: Wednesday, February 28, 2024 12:43 PM
To: Jack Carter

Cc: Nancy Winn (nummingsbcglobal.nei); Tom Campbell; Goetze, Phillip, EMNRD; Gebremichael, Million, EMNRD Subject: RE: [EXTERNAL] RE: Inj Permit: Raybah Regulator 29 SWD#1 API 30-015-41034

Good morning

The disposal permit expired Ipso Facto after one year without injection. You have to start from the beginning.

The disposal authority granted herein shall terminate two years after the effective date of this order if the operator has not commenced injection operations into the subject well. One year after the last date of reported disposal into this well, the Division shall consider the well abandoned, and the authority to dispose will terminate ipso facto. The Division, upon written request mailed by the operator prior to the termination date, may grant an extension thereof for good cause.

Regards Tony Harris Petroleum Specialist Anthony.harris@emnrd.nm.gov 505 549 8131.



From: Jack Carter < iack@oaknrg.com>

Sent: Wednesday, February 28, 2024 9:38 AM

To: Harris, Anthony, EMNRD < Anthony. Harris@emnrd.nm.gov>

Cc: Nancy Winn (<u>nwinn@sbcglobal.net</u>) < <u>nwinn@sbcglobal.net</u>>; Tom Campbell < <u>tom@oaknrg.com</u>>

Subject: RE: [EXTERNAL] RE: Inj Permit: Raybah Regulator 29 SWD#1 API 30-015-41034

Anthony:

Good morning. Very much appreciate your time to respond and the clarification. One additional question. In your initial review and response to our C-108 filing indicated was the need to obtain a new Permit. Instead of filing for a New Permit and paying an additional Permit fee, May we not submit the requested additional material and revised exhibits under the existing permit?

Thanks

Jack

From: Harris, Anthony, EMNRD [mailto:Anthony.Harris@emnrd.nm.gov]
Sent: Wednesday, February 28, 2024 8:25 AM
Tou lack Carter

Subject: RE: [EXTERNAL] RE: Inj Permit: Raybah Regulator 29 SWD#1 API 30-015-41034

Good morning, Jack

The C-108 does specify a ½ mile AOR. However, for wells that inject into the Devonian, the required AOR is 1 mile. My understanding is that specific requirement came from an Oil Conservation Commission ruling.

Unfortunately, the C-108 has not yet been updated to reflect the expanded AOR requirement

Hope this helps.

Regards Tony Harris Petroleum Specialist Anthony.harris@emnrd.nm.gov

505 549 8131.



From: Jack Carter < jack@oaknrg.com> Sent: Tuesday, February 27, 2024 8:31 AM

To: Harris, Anthony, EMNRD < Anthony. Harris@emnrd.nm.gov>

Subject: [EXTERNAL] RE: Inj Permit: Raybah Regulator 29 SWD#1 API 30-015-41034

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

New Mexico State Oil Conservation Division Tony Harris Petroleum Specialist

RE: Permit Application for re-instatement of Permit to inject Lease Water into the Regulator 29 SWD #1

Good morning. Appreciate your response with required need corrections to our request for the reinstatement of the permit for salt water disposal in the Regulator Well of Raybaw's lease produced water. Attempted to reach by the phone number provided below but the voice response indicated the mail box had not been activated. I am involved with revising our submissions and am working toward a timely re submission. Would note that the Form C-108 Revised June 10, 2003 in paragraph V sets out an "one-half mile radius circle drawn around each proposed injection well. This circle identifies the well's area of review" (AOR). By your email this AOR is now 1 mile. Is there a revised more current Form C-108 that we should be using? In advance thank you for your time and assistance.

Thank you

lack

Flint Oak Energy/Raybaw Operating

VP Geology & Land/Adviso 21123 Eva Street, Suite 200 Montgomery, Texas 77356 Direct Phone: 281-387-6515

From: Harris, Anthony, EMNRD [mailto:Anthony.Harris@emnrd.nm.gov]
Sent: Tuesday, February 20, 2024 4:45 PM
To: nwinn@sbcglobal.ne

Cc: Gebremichael, Million, EMNRD; Goetze, Phillip, EMNRD
Subject: RE: [EXTERNAL] Re: Inj Permit: Raybah Regulator 29 SWD#1 API 30-015-41034

Good Afternoon, Nancy

With respect to the subject well, and the expired SWD permit, please note the following:

- A new permit must be obtained.
 - a. Please submit a revised C-108 (ie. incorporating the additional items listed below) via the e-permitting portal
- 2. For Devonian wells, the Area of Review (AOR) must be 1 mile.
 - a. Please update the application (C-108 item VI) to include all wells within 1 mile.
 - b. Proof of Notice (C-108 item XIII) must also be revised to one mile
- 3. Include a chemical analysis for fresh water wells within the 1 mile AOR (C-108 Item XI)
 - a. Cursory review shows multiple water wells (RA 04160, RA08976,RA02786,RA13336 and RA13308) within a 1 mile radius
- 4. Further to item 3, an affirmative statement (C-108 item XII) by qualified professional is required
- 5. The subject well is completed in the Devonian and is approximately 4 miles North-East of a Magnitude 3.3 Seismic event.
 - a. An assessment of potential for Induced Seismicity mut be included with the application
 - b. Refer to attached example that can be used as a guideline

Feel free to contact me if you have any questions or require clarification

Regards Tony Harris Petroleum Specialist Anthony.harris@emnrd.nm.gov



From: Nancy Winn < nwinn@sbcglobal.net > Sent: Wednesday, January 31, 2024 7:01 AM

To: Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>

Cc: Wrinkle, Justin, EMNRD < ! Gebremichael, Million, EMNRD < " Harris, Anthony, EMNRD < " Harris, Million.gebremichael@emnrd.nm.gov <a href="mailto:million.gebremichael@emnrd.nm.

Subject: Re: [EXTERNAL] Re: Ini Permit

Dhillin

Having never tried to file for an Injection Permit, I was hoping someone could give me a little guidance regarding the process. I believe we have all of the required documents (file attached). They are combined into one PDF file. Will they have to be separated out into individual files, or can it be uploaded as one file with tags added?

Please advise. Any assistance is appreciated.

Regards,

Nancy

Nancy J. Winn Geoscience Analyst Raybaw Operating, LLC 281-793-5452 (cell)

On Thursday, December 14, 2023 at 04:50:21 PM CST, Goetze, Phillip, EMNRD <phillip, goetze@emnrd.nm.gov> wrote:

Nancy, your request was noted among many others with a reply provided in the order it was received. To the basic question, the rules are specific. Since the well has lost its injection authority due to abandonment, then a new permit must be obtained. This means a new C-108 application for the well by the operator of record.

My observations: The ability of a new UIC permit for the well seems reasonable but would be dependent on Raybaw's proposed operation. The operation of the well for disposal of Raybaw produced water only would be preferable since this well design is from an earlier time where the Mississippian was included with injection in formations below the Woodford. This configuration is no longer approved. Also, OCD has been working with NMBGMR on regional mapping of the Devonian and Montoya. Since this well predates this effort, selection of the original depths for the formations would be required. If a new correlation of the stratigraphic units shows the well was drilled deeper than originally interpreted, then there may be a requirement in any new permit to plugback as to increase the vertical section that isolates the Precambrian. Please contact me with any questions you may have concerning the process or content of this e-mail. PRG

From: Nancy Winn < nwinn@sbcglobal.net > Sent: Thursday, December 14, 2023 3:08 PM

To: Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>

Subject: [EXTERNAL] Re: Inj Permit

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

Sorry to bug you again, Phil, but I was hoping you could let me know about how to reactivate a disposal well that has not had any injection in over 12 months. See email below.

Any information you can provide will be greatly appreciated.

Thank you!

Nancy

Nancy J. Winn Geoscience Analyst Raybaw Operating, LLC 281-793-5452 (cell)

On Tuesday, December 12, 2023 at 09:45:19 AM CST, Nancy Winn < nwinn@sbcglobal.net > wrote:

Phil,

Raybaw Operating acquired a SWD (Effective 3/24/2023) in Eddy County that has had no injection volumes since Jan of 2020. I looked up the rules regarding disposal/injection permits and found that the permit would have automatically been terminated after 12 months of non-injection.

The well in question is the Regulator 29 SWD #1 (API 30-015-41034).
If we choose to reactivate this disposal well, as opposed to plugging it, what process would we need to go through? I was unable to find this online.
Thank you!
Nancy
Nancy J. Winn Geoscience Analyst Raybaw Operating, LLC 281-793-5452 (cell)

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

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 369761

CONDITIONS

Operator:	OGRID:	
RAYBAW Operating, LLC	330220	
2626 Cole Avenue	Action Number:	
Dallas, TX 75204	369761	
	Action Type:	
	[IM-SD] Admin Order Support Doc (ENG) (IM-AAO)	

CONDITIONS

Created By	Condition	Condition Date
anthony.harris	None	8/2/2024