

**BEFORE THE OIL CONSERVATION COMMISSION
COMMISSION HEARING SEPTEMBER 8, 2022**

CASE No. 22977

INDEPENDENCE AGI #1 & #2 WELLS

LEA COUNTY, NEW MEXICO



**STATE OF NEW MEXICO
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES
OIL CONSERVATION COMMISSION**

**IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
COMMISSION FOR THE PURPOSE OF
CONSIDERING:**

**APPLICATION OF PINON MIDSTREAM,
LLC TO AMEND COMMISSION ORDER
NO. R-21455-A TO INCREASE THE
MAXIMUM DAILY INJECTION RATES
FOR THE INDEPENDENCE AGI #1 AND
#2 WELLS, LEA COUNTY, NEW
MEXICO.**

CASE NO. 22977

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**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION COMMISSION**

**APPLICATION OF PIÑON MIDSTREAM,
LLC TO AMEND COMMISSION ORDER NO.
R-21455-A TO INCREASE THE MAXIMUM
DAILY INJECTION RATES FOR THE
INDEPENDENCE AGI #1 AND #2 WELLS,
LEA COUNTY, NEW MEXICO.**

**CASE NO. 22977
COMMISSION ORDER NO. R-21455-A**

APPLICATION

Piñon Midstream, LLC (“Piñon”) (OGRID 330718) through its undersigned attorneys, hereby makes application to the Oil Conservation Commission pursuant to the provisions of NMSA 1978, Sections 70-2-11 and 70-2-12, to amend Commission Order No. R-21455-A to increase the maximum daily injection rate of treated acid gas for disposal through the Independence AGI #1 and #2 wells from 12 MMSCFD to 20 MMSCFD. In support of this application, Piñon states as follows:

1. The Independence AGI #1 well (API No. 30-025-48081) is an existing vertical well with a surface and bottom hole location approximately 829 feet from the north line and 1,443 feet from the west line (Unit C) of Section 20, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico. It was originally approved by the Commission as an injection well for disposal of treated acid gas (“TAG”) under Commission Order No. R-21455-A in Case No. 21381.

2. Commission Order No. R-21455-A authorized a maximum daily injection rate of 12 MMSCFD into the target injection interval within the Devonian and Silurian formations from a depth of approximately 16,230 to 17,900 feet deep. The order also required a second acid gas

BEFORE THE OIL CONSERVATION COMMISSION

Santa Fe, New Mexico

Exhibit No. A

Submitted by: **Piñon Midstream, LLC**

Hearing Date: September 8, 2022

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injection well (“AGI”) to be approved and capable of receiving volumes of TAG “equal to or greater than the volumes approved for injection into” the Independence AGI #1. *See* Order No. R-21455-A, ¶ 18.

3. Under the terms of Order No. R-21455-A, Piñon timely filed an administrative C-108 application for a redundant injection well, the Independence AGI #2 well (API No. 30-025-49974), which will be a deviated well with a surface location approximately 1,180 feet from the north line and 1,578 feet from the west line (Unit C) and a bottom hole location approximately 1,033 feet from the south line and 2,132 feet from the west line (Unit L) in Section 20, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico. It will inject into the same target reservoir as the AGI #1 well, from approximately 16,080 to 17,683 feet deep within the Devonian and Silurian formations.

4. In the C-108 application, Piñon sought authority to inject up to 20 MMSCFD between the Independence AGI #1 and #2 wells.

5. Order No. R-21455-A authorized the Division to approve an administrative C-108 application for the required second well “that is capable of receiving volumes of TAG that is equal to or greater than the volumes approved for injection into the Independence AGI Well No. 1.” *See* Order No. R-21455-A, ¶ 18. The Division issued its approval through administrative order SWD-2462 on March 31, 2022.

6. Notwithstanding the fact that Order No. R-21455-A authorized the Division to administratively approve a second well “that is capable of receiving volumes of TAG that is equal to or greater than the volumes approved for injection into the Independence AGI Well No. 1” and to increase the maximum operating surface injection pressure for the Independence AGI #2, it has taken the position that the Order limits the combined maximum rate of injection for

both AGI wells to 12 MMSCFD and that the Division does not have authority to administratively increase the maximum daily injection rate to 20 MMSCFD. SWD-2462 states that “Under Order No. R-21455-A, a combined total of 12 MMSCFD for both Independence AGI wells injecting concurrently” is the maximum daily injection rate.

7. The Independence AGI wells serve Piñon’s Dark Horse Gas Treatment Plant, which has an anticipated disposal need of up to 20 MMSCFD. Accordingly, Piñon requires authority to increase the total maximum injection rate of TAG that may be injected between both of its AGI wells from 12 MMSCFD to 20 MMSCFD.

WHEREFORE, Piñon Midstream, LLC requests that this application be set for hearing before the Oil Conservation Commission on August 11, 2022, and, after notice and hearing as required by law, the Commission amend Order No. R-21455-A to increase the maximum daily injection rate of TAG from 12 MMSCFD to 20 MMSCFD.

Respectfully submitted,

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**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION COMMISSION**

**APPLICATION OF AMEREDEV
OPERATING, LLC FOR
AUTHORIZATION TO INJECT, LEA
COUNTY, NEW MEXICO.**

**CASE No. 21381
ORDER No. R-21455-A**

ORDER OF THE COMMISSION

THIS MATTER comes before the New Mexico Oil Conservation Commission (“Commission”) on Ameredev Operating, LLC’s (“Ameredev”) *Application for Authorization to Inject, Lea County, New Mexico* (“Application”). The Commission, having conducted a hearing on October 8, 2020, and having considered the testimony and the record in this case, enters the following findings of fact, conclusions of law, and order.

FINDINGS OF FACT

1. On July 10, 2020, Ameredev filed its Application seeking authorization to inject treated acid gas (“TAG”) into the proposed Independence AGI No. 1 well (“Well”).
2. The Well is an Underground Injection Control (“UIC”) Class II well subject to the requirements of 19.15.26 NMAC.
3. The Well is vertical with an approximate surface and bottom hole location approximately 829 feet from the north line and 1,443 feet from the west line (Unit C) of Section 20, Township 25 South, Range 36 East in Lea County.
4. The target injection zone will be from approximately 16,230 to 17,900 feet deep in the Devonian Thirty-One and Upper Silurian Wristen and Fusselman formations.
5. The Well’s maximum daily injection rate is twelve million standard cubic feet per day (“MMSCFD”).
6. The Well’s maximum surface injection pressure is approximately 4,779 pounds per square inch gauge (“psig”).
7. Ameredev gave personal notice of the Application and the Commission’s hearing via certified mail, return receipt requested to the State Land Office and all operators, surface owners, and lessees within a one-mile radius of the location for the Well, but did not give notice to the Oil Conservation Division or the City of Jal, which is located approximately six miles from the Well.

BEFORE THE OIL CONSERVATION COMMISSION

Santa Fe, New Mexico

Exhibit No. B

Submitted by: **Piñon Midstream, LLC**

Hearing Date: September 8, 2022

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8. The Commission gave public notice of the Application and the Commission's hearing by publication in a newspaper of general circulation in Lea County.

9. Tap Rock Operating, LLC ("Tap Rock") filed an Entry of Appearance on September 10, 2020.

10. The OCD filed an Entry of Appearance and Notice of Intervention on September 22, 2020.

11. The Commissioner of Public Lands of the State of New Mexico, Stephanie Garcia Richard, and the New Mexico State Land Office ("SLO") filed an Entry of Appearance on October 1, 2020.

12. OCD filed a Pre-Hearing Statement on October 1, 2020, stating that OCD's witness would testify that OCD does not oppose Ameredev's Application provided that the Order includes the specific and general conditions stated in OCD Exhibits 2 and 3 (collectively, "Conditions"), and contingent on OCD's review of Ameredev's revised plume dispersion modeling which was not completed at the time of filing the Pre-Hearing Statement.

13. SLO filed a Pre-Hearing Statement on October 1, 2020, stating that SLO's witnesses would testify that SLO concurred with the OCD's Conditions, and also would testify regarding the potential effect of injection into the proposed well on state trust resources.

14. No other person filed an objection to the Application or an entry of appearance.

15. The Commission held a hearing on the Application on October 8, 2020.

16. In support of the Application, Ameredev presented the testimony of three witnesses: Mr. Floyd Hammond, Chief Operating Officer, Ameredev; Mr. Alberto Gutierrez, President, Geolex, Inc.; and Mr. David White, Geologist, Geolex, Inc.

17. Mr. Hammond provided background regarding Ameredev, including its future H₂S treating investment plans and proposal for TAG disposal. Mr. Hammond also testified regarding the benefits of disposing of TAG through an acid gas injection ("AGI") well. Specifically, Mr. Hammond testified that authorization for the Well will allow Ameredev to design and construct a gas treating facility and will provide necessary capacity for needed TAG disposal in the area of the proposed injection. Mr. Hammond testified that the proposed treating facility and Well are needed to resume production in at least nine horizontal wells operated by Ameredev that have been shut-in or curtailed due to a lack of TAG disposal capacity in the area and will allow Ameredev to complete six additional horizontal wells and to drill and develop 89 additional horizontal wells, and to provide services to other operators. Mr. Hammond testified that, in his opinion, Ameredev's proposal to dispose of TAG through the Well will increase reliability of production operations in the area, help prevent shut-ins, and prevent waste and protect correlative rights.

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18. Mr. Hammond testified that Ameredev agrees to the Conditions. With respect to the redundant well, Mr. Hammond testified that Ameredev would shut in wells to deal with operational or maintenance issues that might arise after the Well begins to operate and before the redundant well begins to operate; that Ameredev factored the cost of the redundant well into its economic analysis for the Well and the proposed natural gas processing plant; and that if Ameredev does not build the redundant well or tries to back out of the agreement to build the redundant well, it must shut down the Well. Mr. Hammond also testified that Ameredev understands that the Conditions give OCD the discretion to decide whether the final design for the Well is acceptable, and that the redundant well must be built in essentially the same manner as approved for the Well.

19. Mr. Gutierrez testified regarding the information contained in the Application and regarding the site geology and hydrogeology and stated that, in his opinion, the proposed injection zone provides a sufficient capacity and geologic seal to contain the injected TAG and prevent its migration into other zones; the injection zone is sufficiently isolated from any protectable groundwater sources; and there is no evidence that injection will impair existing or potential hydrocarbon production in the area.

20. Mr. Gutierrez testified regarding the design and operation of the Well, and observed that Ameredev had made significant changes to the well design as a result of concerns raised by OCD and SLO after the agencies learned about the Application.

21. Mr. Gutierrez testified that Ameredev will submit its H₂S Contingency Plan for OCD approval prior to commencement of injection, and that Ameredev will certify that it coordinated the plan with the State Emergency Response Commission and the local emergency planning committee, including representatives of the City of Jal, and will provide them with regular updates during operation of the Well.

22. Mr. Gutierrez testified that, in his opinion, the Well will not pose health and safety risks, and the Well will not cause waste or damage correlative rights in any formations in the area.

23. Mr. White testified regarding Geolex's evaluation of the potential for induced seismicity, including seismic review of the area and the preparation of fault-slip modeling. Based on this evaluation, Mr. White testified that the Well can be operated under the proposed operating conditions without contributing significantly to the total risk of injection-induced fault slip.

24. Mr. White further testified the injected TAG is not anticipated to present any risk for vertical migration out of the injection zone based on Geolex's evaluation of local subsurface pressure conditions to assess reservoir containment, including the over-pressure conditions overlying the injection interval, drilling-fluid characteristics, and drilling-fluid programs for the Well. Mr. White confirmed that the injected TAG is not expected to migrate vertically out of the injection zone due to the presence of a dense caprock and because the target injection zone is expected to be under-pressured relative to the overlying strata.

25. Mr. White also testified on plume dispersion modeling over a 30-year period of injection, which included the influence of offsetting injection from saltwater disposal wells. Mr.

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White testified that the maximum lateral dispersion of TAG from the Well is predicted to be from approximately 1.6 miles to 1.8 miles, with TAG dispersion at 20% saturation extending to approximately one mile to 1.3 miles from the Well. He testified that, based on the data analyzed, the proposed injection zone is a good candidate for the injection of TAG; the TAG plume and pressure front will not reach producing intervals; the TAG plume will be contained within the injection interval; and TAG can safely be injected into the Well. Mr. White concluded that, in his opinion, the Well will not result in waste, impair correlative rights, or have a negative impact on public health or the environment.

26. OCD presented the testimony of one witness, Baylen Lamkin, along with six exhibits in support of his testimony. Mr. Lamkin testified that OCD worked closely with SLO to develop the Conditions, and that Ameredev had told OCD and SLO that it would accept and comply with the Conditions.

27. Mr. Lamkin testified that the condition requiring a redundant well is important to prevent waste associated with flaring as a result of mechanical issues or maintenance on the Well, and that the condition concerning well construction is important to protect hydrologic flows in the Salado formation and the protectable water source in the Capitan Reef given historic problems with cement returns for long intermediate casing strings. Mr. Lamkin also testified that the remaining conditions were the same conditions adopted in orders granting applications for AGI wells in two prior cases, except for the addition of the certification requirement for the H₂S Contingency Plan.

28. Mr. Lamkin testified that OCD does not oppose the Application, provided that the Commission adopt the Conditions, because they would ensure that the Well prevents waste and does not harm correlative rights, public health, or the environment. Mr. Lamkin testified that OCD has residual concerns about certain assumptions used in Ameredev's fault-slip and plume dispersion modeling, such as porosity, permeability, water saturation, zone definitions, and fault sealing, but that these concerns would be somewhat ameliorated by the condition requiring Ameredev to recalculate its models using observed data five years after commencing injection into the Well.

29. The Commission accepted Ameredev's late-filed Exhibit 3—Updated 2. The Commission also adopted the Conditions with certain modifications reflected below.

CONCLUSIONS OF LAW

1. The Commission has jurisdiction over the Parties and the subject matter of this case.
2. Proper public notices of the Application and the Commission's hearing were given, including personal notices to all operators, surface owners, and lessees within a one-mile radius of the Well.
3. The Application is complete.

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4. OCD records show that Ameredev Operating, LLC (OGRID No. 372224) is in compliance with Subsection A of 19.15.5.9 NMAC.

5. The Well, if constructed and operated in accordance with the Conditions, as modified by the Commission, will comply with the requirements of 19.15.26 NMAC.

6. Ameredev's injection of TAG, if conducted in accordance with the Conditions, as modified by the Commission, will not cause waste, impair correlative rights, or harm public health or the environment.

ORDER

1. The Application is approved, and Ameredev is authorized to drill and operate the Well with an approximate surface and bottom hole location at approximately 829 feet from the north line and 1,443 feet from the west line (Unit C) of Section 20, Township 25 South, Range 36 East, N.M.P.M., Lea County, New Mexico, to dispose of TAG at a maximum daily injection rate of 12 MMSCFD into the Devonian Thirty-One and Wristen Fusselman formations at depths of approximately 16,230 to 17,900 feet deep and a maximum surface injection pressure not to exceed 4,779 psig, subject to these Conditions.

2. Ameredev shall construct the Independence AGI Well No. 1 in accordance with the design and plan of construction approved by OCD, including the use of corrosion-resistant casing, cement, tubing, and packer, and shall isolate and protect the Salado and Capitan intervals, by (1) installing and cementing an intermediate casing string through the Salado interval before drilling into the Capitan interval; and (2) cementing the subsequent intermediate casing to protect the Capitan interval from the Delaware Mountain Group.

3. Ameredev shall circulate cement for all casing to the surface.

4. Ameredev shall use a corrosion-inhibiting diesel with a biocide component as the annular fluid of the well.

5. Ameredev shall equip the Well with a pressure-limiting device and a one-way safety valve (with the appropriate interior drift diameter) on the tubing approximately 250 feet below the surface.

6. No later than forty-five (45) days after drilling the Well, Ameredev shall submit to OCD's district office the well drilling logs including mudlogs, electric logs, daily reports, static bottom-hole pressure measured at completion of drilling the well, and a written evaluation of the hydrocarbon resource potential for the approved injection interval. If a significant hydrocarbon show occurs during drilling the Well, Ameredev shall submit a Form C-103 and obtain OCD's written approval prior to commencing injection.

7. No later than forty-five (45) days after completing the Well, Ameredev shall submit to OCD the final reservoir evaluation and confirm that the open-hole portion of the Well does not intersect the fault plane of any identified fault that occurs within the approved injection interval.

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8. No later than thirty (30) days prior to commencing injection into the Well, Ameredev shall:

a. Obtain OCD's approval of a hydrogen-sulfide contingency plan that complies with Rule 19.15.11.9 NMAC, and that (i) includes a contingency plan for and a GIS mapping layer showing the gathering lines associated with the natural gas processing plant(s) served by the Well; and (ii) certifies that Ameredev has contacted and coordinated with appropriate representatives of the city of Jal, Lea County, the State Emergency Response Commission, and the local emergency preparedness committee and will provide regular updates to the same at least annually;

b. Determine the salinity of the formation fluid from the approved injection interval and submit to OCD either a calculation of the estimated salinity based on open-hole logs or the actual salinity based on a laboratory analysis. If OCD determines that the salinity of the formation fluid from the approved injection interval contains a total dissolved solids (TDS) concentration of 10,000 milligrams or less, the injection authority under this Order shall be suspended and Ameredev shall not commence injection until Ameredev complies with 19.15.26.8(E) NMAC;

c. Conduct step-rate and fall-off tests. Ameredev may adjust the maximum surface injection pressure for the Well after these tests with OCD's written approval; and

d. Obtain OCD's approval of immediate notification parameters for annulus pressure and tubing and casing differential pressure at a set injection temperature.

9. No later than ninety (90) days after commencing injection into the Well, and no less frequently than annually thereafter, Ameredev shall consult with OCD regarding the immediate notification parameters. If OCD determines that the immediate notification parameters should be modified, Ameredev shall provide modified parameters within thirty (30) days of notification for review by OCD.

10. Ameredev shall conduct an annual mechanical integrity test (MIT) on the Well.

11. Ameredev shall conduct continuous monitoring of surface TAG injection pressure, temperature, rate, surface annular pressure, and bottom-hole (or "end of tubing") temperatures and pressures in the tubing and annulus.

12. Ameredev shall maintain a maintenance log, including the volume of annular fluid (diesel) replaced in the annulus of the Well.

13. Ameredev shall establish and submit for OCD approval the temperature parameters for injected fluid, install and maintain temperature-activated controls to govern the temperature of injected fluid, and install and maintain an alarm system for the controls to indicate exceedance of the parameters.

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14. Ameredev shall report to OCD on a quarterly basis (unless changed to a biannual basis upon approval of the OCD Director) the summary data for injection parameters monitored pursuant to this Order, and upon request by OCD, shall submit annual reports after each year of operation, which shall include composition and volume of acid gas injected into the Well.

15. No later than thirty (30) days after the fifth (5th) year of injection into the Well, Ameredev shall submit to OCD a report summarizing the Well's performance, including injected volumes by fluid type, change in reservoir pressures, the model originally used in the Application recalibrated using that information, and seismic modeling. Ameredev shall provide an in-person presentation of the report to the Commission at its request.

16. Ameredev shall install, operate, and monitor for the life of this Order a seismic monitoring station or stations. OCD shall be responsible for coordinating with the Manager of the New Mexico Tech Seismological Observatory at the New Mexico Bureau of Geology and Mineral Resources for appropriate specifications for the equipment and the required reporting procedure for the monitoring data.

17. In the event Ameredev transfers ownership of the Well, Ameredev shall seek approval of such change in ownership from OCD pursuant to 19.15.9.9 NMAC.

18. No later than twelve (12) months after issuance of this Order, Ameredev shall file a C-108 with OCD for approval to construct a redundant AGI well ("Redundant Well") in Devonian-Silurian formations that is capable of receiving volumes of TAG that is equal to or greater than the volumes approved for injection into the Independence AGI Well No. 1. No later than twenty (24) months after issuance of this Order, Ameredev will complete the Redundant Well subject to the Conditions this Order. OCD is authorized to review and approve the Redundant Well.

19. If Ameredev fails to timely submit or to diligently prosecute the application for the Redundant Well, fails to construct the Redundant Well by the specified deadline after receiving OCD's approval, or requests an exemption or rescission of the above condition, this Order shall terminate automatically and Ameredev shall plug and abandon the Independence AGI Well No. 1 pursuant to an OCD-approved plan; provided, however, that OCD in its sole discretion may grant an extension of time not to exceed six (6) months to the completion deadline in Paragraph 18 for good cause shown.

20. The injection authority herein granted shall terminate two years after the effective date of this Order if Ameredev has not commenced injection operation. The OCD Director, upon written request of Ameredev submitted prior to the expiration of this Order may extend this time for good cause shown.

21. After 30 years from the date of the Commission's Order in this case, the authority granted by this Order shall terminate unless Ameredev or its successor-in-interest shall make application before the Commission for an extension to inject.


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DONE at Santa Fe, New Mexico on the 4th day of November, 2020.

STATE OF NEW MEXICO
OIL CONSERVATION COMMISSION



Adrienne Sandoval, M.E., Chair

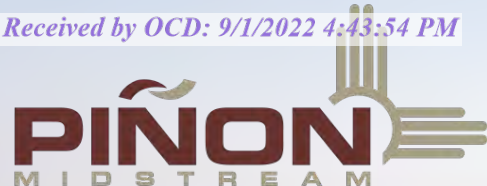


Dr. Thomas Engler, P.E., Member



Jordan Kessler, Esq., Member

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Piñon Midstream Overview



Independence AGI #2 Capacity Expansion
September 8, 2022

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BEFORE THE OIL CONSERVATION COMMISSION

Santa Fe, New Mexico

Exhibit No. C

Submitted by: Piñon Midstream, LLC

Hearing Date: September 8, 2022

Case No. 22977



General Disclaimers and Forward-Looking Statements

This presentation is for informational purposes only and contains general information about the activities of Pinon Midstream, LLC (“**Piñon**”) that does not purport to be complete. Piñon has prepared this presentation based on information available to it, including information from public sources that has not been independently verified. No representation, express or implied, is made as to, and no reliance should be placed on, the fairness, accuracy, completeness or correctness of the statements (both oral and written), opinions or information contained within (or accompanying) this presentation.

Statements (both oral and written) made in connection with this presentation are made as of the date hereof unless stated otherwise herein, and the delivery of this presentation at any subsequent time will not, under any circumstances, create an implication that the information contained herein is correct as of such subsequent time. Piñon is under no obligation to update or keep current the information contained in this presentation.

This presentation, and any oral statements made in connection with this presentation, contain forward-looking statements. All statements, except for statements of historical fact, that relate to the anticipated future activities, plans, strategies, objectives or expectations of Piñon are forward-looking statements. When used in this presentation, the use of words and phrases including “anticipates,” “believes,” “continue,” “could,” “estimates,” “expects,” “focused on,” “forecast,” “guidance,” “intends,” “maintain,” “may,” “opportunities,” “outlook,” “plans,” “potential,” “strategy,” “targets,” “will,” “would” and other similar terminology is intended to identify forward-looking statements, although not all forward-looking statements contain such identifying words or phrases. Readers are cautioned against unduly relying on forward-looking statements which, by their nature, involve numerous assumptions and are subject to both known and unknown risks and uncertainties (many of which are beyond Piñon’s control) that may cause such statements not to occur, or actual results to differ materially and/or adversely from those expressed or implied.

Background & Expertise

- Natural gas produced in the eastern Delaware Basin generally contains relatively high concentrations of H₂S and CO₂ (“**sour gas**”), which has historically led to lower levels of oil and natural gas development despite extremely strong well results
- Piñon is focused on gathering and treating sour gas to remove, capture and permanently sequester H₂S and CO₂
 - Formed in 2020 and headquartered in Houston, TX
 - Financial partners include Black Bay Energy Capital and Ameredev II, LLC
- Piñon’s gathering, treating and disposal facilities are specifically designed and built to handle sour gas
 - (2) in-service 400 GPM amine units (170 MMcf/d)
 - 35 miles of high-pressure gathering/redelivery pipelines
 - 45,000 horsepower of full NACE compression
 - Independence AGI #1 (12 MMcf/d)
 - Independence AGI #2 (Project in Progress: 15,336 Ft as of Aug 30, 2022)
- Piñon’s Management team, has over 55 years of combined oil and gas experience, with specific expertise in:
 - Design, construction and operation of sour gas facilities
 - Commercial structures for treating and redelivering co-mingled natural gas streams
 - Carbon management and sequestration, including 45Q tax credits and voluntary carbon offset credit markets

Operations



- Piñon’s assets have an excellent safety track record and have contributed to both reduced flaring and increased natural gas production within the eastern Delaware Basin
 - Zero recordable Incidents
 - 2022 Field hours worked 30,178, TRIR-0.0
 - 2021 Field hours worked 17,830, TRIR-0.0
 - All major components within Piñon system have built in redundancy (AGI Compression & Gas Deliveries)
- Piñon’s facilities are equipped with systems that allow gas to be shut-in, as opposed to flared, during unexpected shutdowns

Piñon Midstream Overview

Piñon's assets provide a comprehensive, scalable and environmentally responsible sour gas solution for oil and natural gas producers and midstream operators in the eastern Delaware Basin



Aug-21

Dark Horse
Treating Facility,
Grande Phase I
Pipeline, and
Independence AGI
#1 in-service



Oct-21

Gila Compressor
Station in-service



Apr-22

Grande Phase
II Pipeline in-
service

June-22

Independence
AGI #2 spud

Dec-20

Piñon formed in
partnership with
Black Bay and
Amerdev

2020

2021

2022

Mar-21

Dark Horse
Treating Facility
construction begins



Sep-21

White Horse
Compressor
Station & Hondo
HP Sour Pipeline
in-service

Dec-21

Amine Train II
in-service

May-22

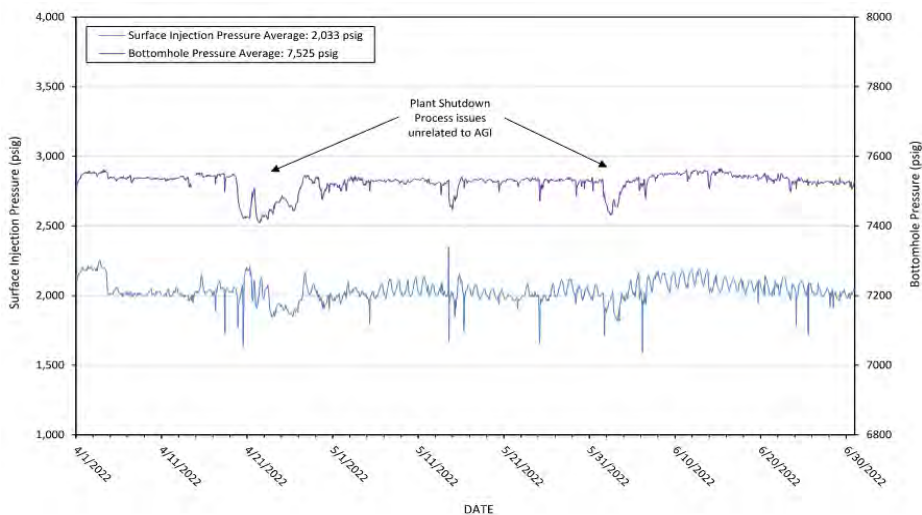
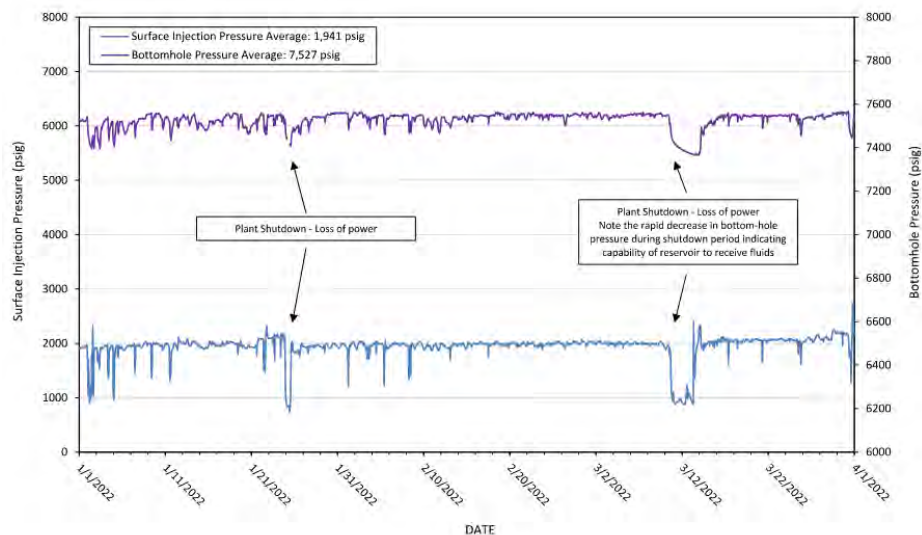
Field compression
added for
production ramp

October-22

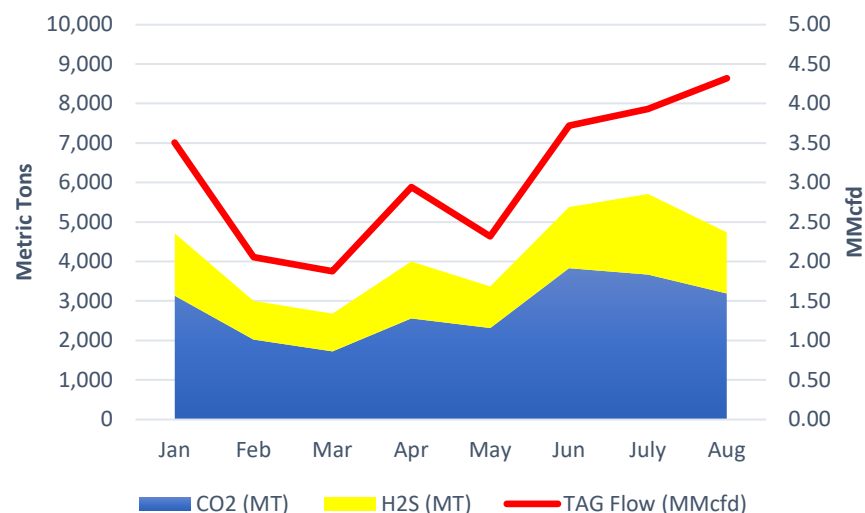
Independence AGI #2
projected in-service

Piñon Midstream Overview

AGI Performance



AGI Sequestration Volumes

2022 Performance
AGI Injection Mass & Volume

	Jan	Feb	Mar	Apr	May	Jun	July	Aug
Avg MMcf	3.51	2.05	1.88	2.94	2.32	3.72	3.93	4.32
CO ₂ (MT)	3,130	2,021	1,725	2,560	2,312	3,827	3,665	3,194
H ₂ S (MT)	1,581	985	956	1,440	1,057	1,550	2,041	1,540

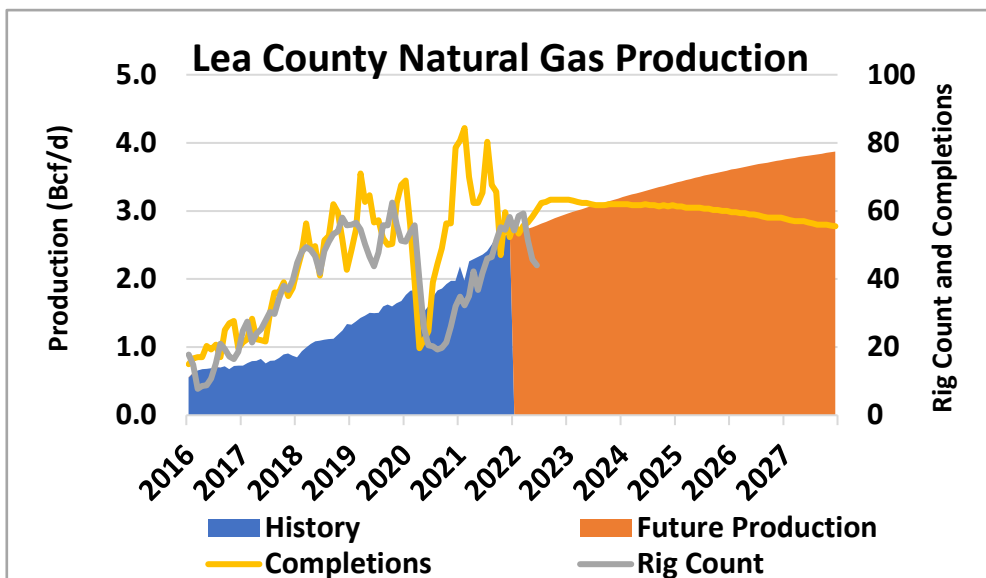
Note: August Data consists of 23 days

Piñon Midstream Overview

Current and Future Needs – AGI Capacity

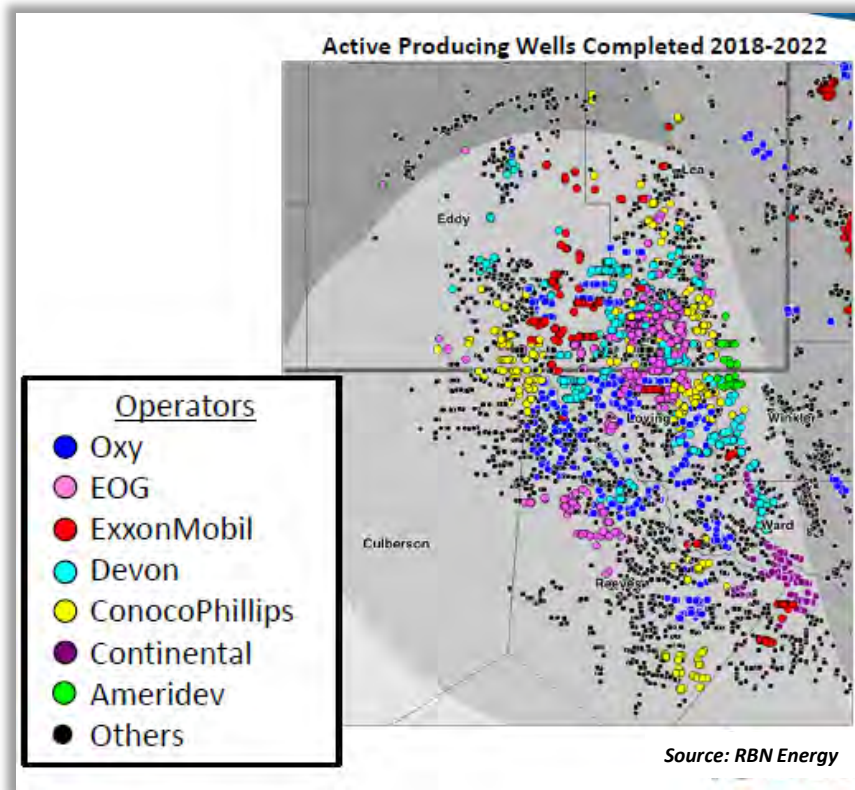
	AGI Capacity (MMcfd)	Plant Treating Capacity (MMcfd)	H ₂ S - Annual (MT)	CO ₂ - Annual (MT)
Current AGI Capacity	12	260	97,000	109,500
Requested AGI Capacity	20	430	160,200	181,000

- Lea and Eddy counties are projected to see continued growth in natural gas production for the foreseeable future and Piñon's footprint is ideal for supporting such growth.
- With lead-times of up to 12 months, incremental sour gas infrastructure requires significant advanced planning and must be in-service to support the projected natural gas growth in the region.



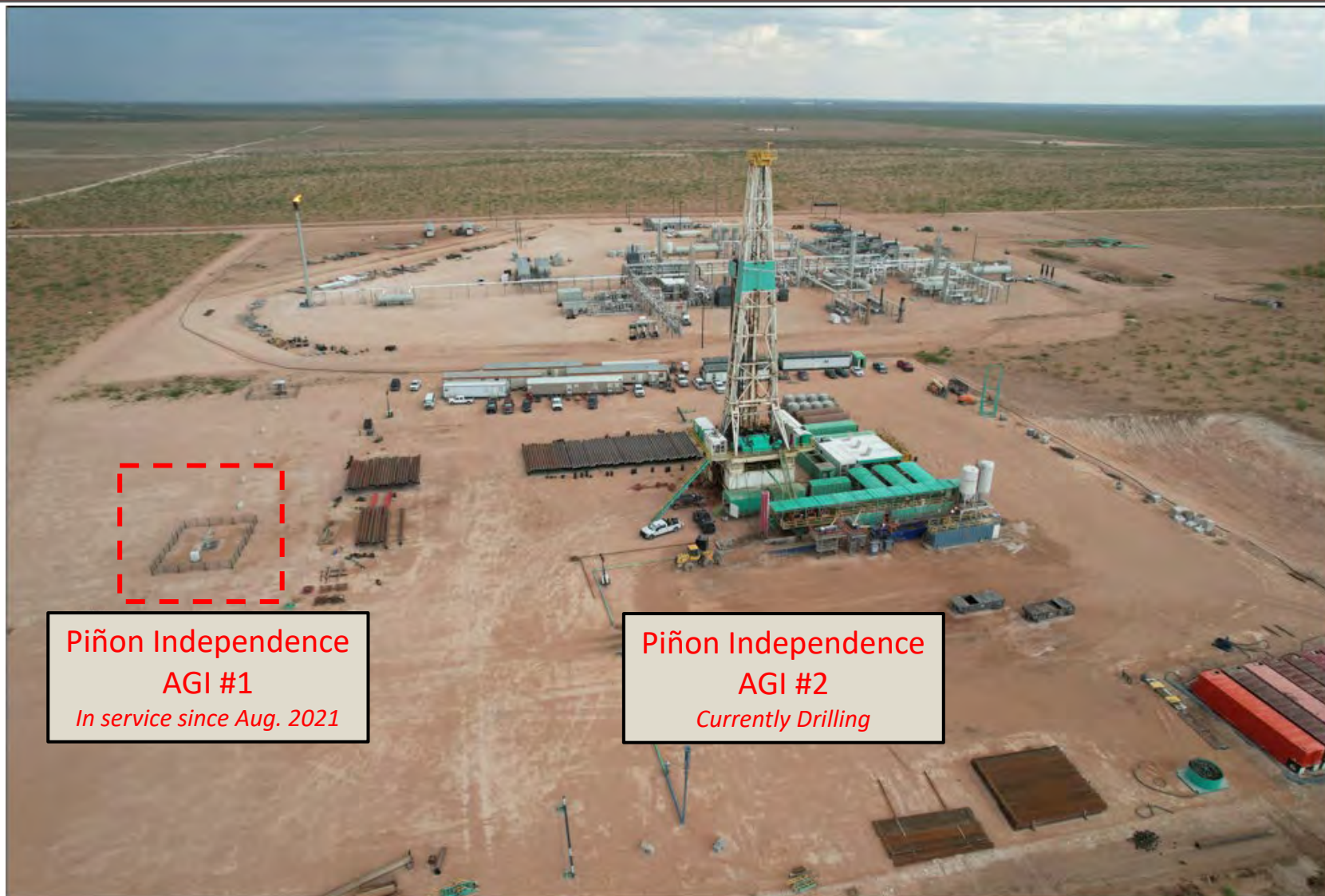
Source: RBN Energy

Recent Oil & Gas Development





Piñon Midstream – Proven AGI Experience



Piñon Independence
AGI #1
In service since Aug. 2021

Piñon Independence
AGI #2
Currently Drilling

Initial Application Part I

BEFORE THE OIL CONSERVATION COMMISSION

Santa Fe, New Mexico

Exhibit No. D

Submitted by: **Piñon Midstream, LLC**

Hearing Date: September 8, 2022

Case No. 22977

Received 11/4/21

This application is placed in file for record. It MAY or MAY NOT have been reviewed to be determined Administratively Complete



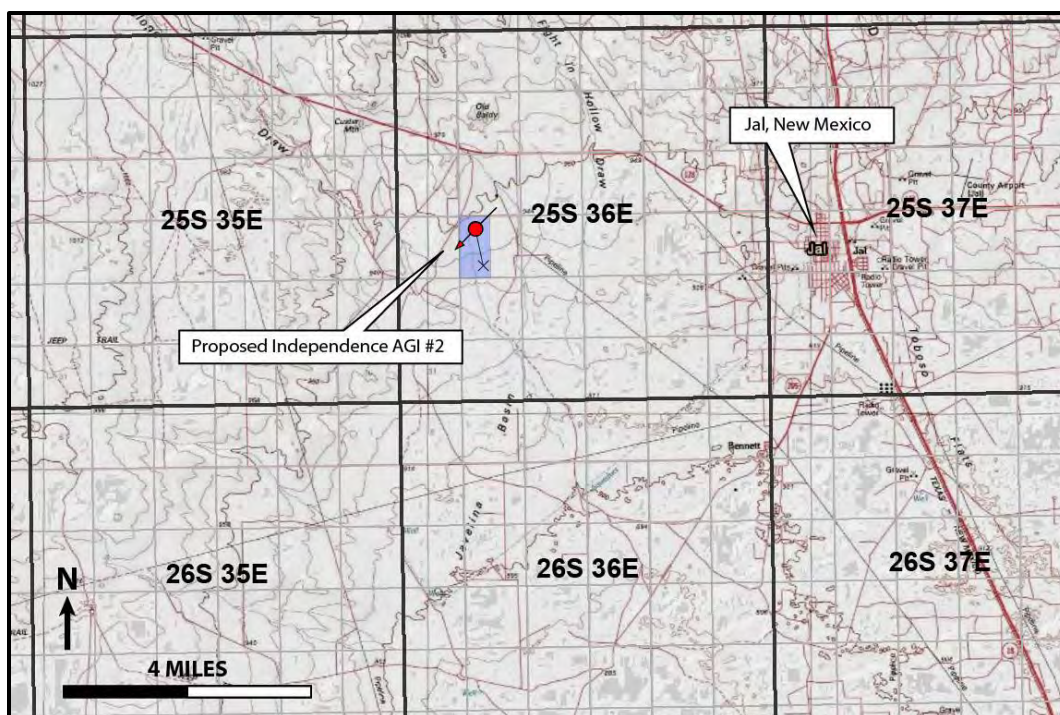
APPLICATION FOR CLASS II AGI WELL PINON MIDSTREAM

INDEPENDENCE AGI #2

Surface Location: 1,180' FNL & 1,578' FWL, Section 20, T25S, R36E
Bottom-Hole Location: 2,132 FWL & 1,033 FSL, Section 20, T25S, R36E
Lea County, New Mexico

Surface Hole Latitude (NAD83): 32.120020
Surface Hole Longitude (NAD83): -103.291015

Bottom-Hole Latitude (NAD83): 32.111581
Bottom-Hole Longitude (NAD83): -103.289273



November, 2021

Prepared For:

Piñon Midstream
20445 SH 249, Suite 300
Houston, Texas 77070
(713) 300-9300

Prepared By:


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500 Marquette Ave, Suite 1350
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STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL
RESOURCES DEPARTMENT

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, New Mexico 87505

FORM C-108
Revised June 10, 2003

APPLICATION FOR AUTHORIZATION TO INJECT

- I. PURPOSE: Secondary Recovery Pressure Maintenance X Disposal Storage
Application qualifies for administrative approval? X Yes No
- II. OPERATOR: PIÑON MIDSTREAM
ADDRESS: 20445 SH 249, SUITE 300, HOUSTON, TEXAS 77070
CONTACT PARTY: STEVEN GREEN PHONE: (713) 300-9300
- III. WELL DATA: Complete the data required on the reverse side of this form for each well proposed for injection.
Additional sheets may be attached if necessary. **SWD-2464**
- IV. Is this an expansion of an existing project? X Yes No
If yes, give the Division order number authorizing the project: R-21455-A
- V. Attach a map that identifies all wells and leases within two miles of any proposed injection well with a one-half mile radius circle drawn around each proposed injection well. This circle identifies the well's area of review. **SECTIONS 5 & 6; APPENDICES A & B**
- VI. Attach a tabulation of data on all wells of public record within the area of review which penetrate the proposed injection zone. Such data shall include a description of each well's type, construction, date drilled, location, depth, record of completion, and a schematic of any plugged well illustrating all plugging detail. **SECTIONS 5; APPENDIX A**
- VII. Attach data on the proposed operation, including:
1. Proposed average and maximum daily rate and volume of fluids to be injected; **SECTIONS 1, 2, & 3**
 2. Whether the system is open or closed; **SECTIONS 1, 2, 4, & 7**
 3. Proposed average and maximum injection pressure; **SECTIONS 1 & 3**
 4. Sources and an appropriate analysis of injection fluid and compatibility with the receiving formation if other than reinjected produced water; and, **SECTIONS 3 & 4**
 5. If injection is for disposal purposes into a zone not productive of oil or gas at or within one mile of the proposed well, attach a chemical analysis of the disposal zone formation water (may be measured or inferred from existing literature, studies, nearby wells, etc.). **SECTIONS 3 & 4**
- *VIII. Attach appropriate geologic data on the injection zone including appropriate lithologic detail, geologic name, thickness, and depth. Give the geologic name, and depth to bottom of all underground sources of drinking water (aquifers containing waters with total dissolved solids concentrations of 10,000 mg/l or less) overlying the proposed injection zone as well as any such sources known to be immediately underlying the injection interval. **SECTIONS 3 & 4**
- IX. Describe the proposed stimulation program, if any. **NOT APPLICABLE**
- *X. Attach appropriate logging and test data on the well. (If well logs have been filed with the Division, they need not be resubmitted).
WELL NOT YET DRILLED
- *XI. Attach a chemical analysis of fresh water from two or more fresh water wells (if available and producing) within one mile of any injection or disposal well showing location of wells and dates samples were taken. **SECTION 4.5**
- XII. Applicants for disposal wells must make an affirmative statement that they have examined available geologic and engineering data and find no evidence of open faults or any other hydrologic connection between the disposal zone and any underground sources of drinking water. **SECTION 7.0**
- XIII. Applicants must complete the "Proof of Notice" section on the reverse side of this form.
- XIV. Certification: I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.
- NAME: ALBERTO A. GUTIÉRREZ TITLE: PRESIDENT - GEOLEX, INC.
CONSULTANT TO PIÑON MIDSTREAM
SIGNATURE:  DATE: 11/1/2021
E-MAIL ADDRESS: AAG@GEOLEX.COM
- * If the information required under Sections VI, VIII, X, and XI above has been previously submitted, it need not be resubmitted. Please show the date and circumstances of the earlier submittal: _____

DISTRIBUTION: Original and one copy to Santa Fe with one copy to the appropriate District Office

Side 2

III. WELL DATA

A. The following well data must be submitted for each injection well covered by this application. The data must be both in tabular and schematic form and shall include:

- (1) Lease name; Well No.; Location by Section, Township and Range; and footage location within the section.
- (2) Each casing string used with its size, setting depth, sacks of cement used, hole size, top of cement, and how such top was determined.
- (3) A description of the tubing to be used including its size, lining material, and setting depth.
- (4) The name, model, and setting depth of the packer used or a description of any other seal system or assembly used.

Division District Offices have supplies of Well Data Sheets which may be used or which may be used as models for this purpose. Applicants for several identical wells may submit a "typical data sheet" rather than submitting the data for each well.

B. The following must be submitted for each injection well covered by this application. All items must be addressed for the initial well. Responses for additional wells need be shown only when different. Information shown on schematics need not be repeated.

- (1) The name of the injection formation and, if applicable, the field or pool name.
- (2) The injection interval and whether it is perforated or open-hole.
- (3) State if the well was drilled for injection or, if not, the original purpose of the well.
- (4) Give the depths of any other perforated intervals and detail on the sacks of cement or bridge plugs used to seal off such perforations.
- (5) Give the depth to and the name of the next higher and next lower oil or gas zone in the area of the well, if any.

XIV. PROOF OF NOTICE

All applicants must furnish proof that a copy of the application has been furnished, by certified or registered mail, to the owner of the surface of the land on which the well is to be located and to each leasehold operator within one-half mile of the well location.

Where an application is subject to administrative approval, a proof of publication must be submitted. Such proof shall consist of a copy of the legal advertisement which was published in the county in which the well is located. The contents of such advertisement must include:

- (1) The name, address, phone number, and contact party for the applicant;
- (2) The intended purpose of the injection well; with the exact location of single wells or the Section, Township, and Range location of multiple wells;
- (3) The formation name and depth with expected maximum injection rates and pressures; and,
- (4) A notation that interested parties must file objections or requests for hearing with the Oil Conservation Division, 1220 South St. Francis Dr., Santa Fe, New Mexico 87505, within 15 days.

NO ACTION WILL BE TAKEN ON THE APPLICATION UNTIL PROPER PROOF OF NOTICE HAS BEEN SUBMITTED.

NOTICE: Surface owners or offset operators must file any objections or requests for hearing of administrative applications within 15 days from the date this application was mailed to them.

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1.0 EXECUTIVE SUMMARY

On behalf of Piñon Midstream, LLC (Piñon), Geolex, Inc.[®] (Geolex) has prepared and is hereby submitting a complete C-108 application for approval to drill, complete, and operate a redundant acid gas (CO₂ and H₂S) injection well in Section 20, Township 25 South, Range 36 East (32.120020, -103.291015 NAD83), approximately six miles west of Jal in Lea County, New Mexico (Figure 1). The Independence AGI #2 well is intended to provide a simultaneous and redundant acid gas injection well option for the Dark Horse Gas Treatment Facility, which currently operates with a single acid gas injection well, the Independence AGI #1, which was put in service on August 21, 2021.

The proposed Independence AGI #2 is designed to provide operational efficiency and redundancy and to accommodate the anticipated disposal needs of the Piñon Midstream Dark Horse Gas Treatment Plant (Dark Horse), which needs to safely inject up to a maximum of twenty (20) million standard cubic feet (MMSCF) per day (approximately 8,530 barrels per day) of treated acid gas (TAG) between two (2) injection wells for at least 30 years. The TAG stream is anticipated to consist of approximately 70% carbon dioxide (CO₂) and 30% hydrogen sulfide (H₂S) with trace components of hydrocarbons (C₁ – C₇). When operating at full capacity, The AGI system (Independence AGI #1 and # 2) will permanently sequester approximately 858 tons of CO₂ and approximately 285 tons of H₂S per day.

Independence AGI #2 will be drilled as a deviated well with a surface-hole location (SHL) of approximately 1,180 feet from the north line (FNL) and 1,578 feet from the west line (FWL) of Section 20. The bottom-hole location (BHL) is to be located 1,033 feet from the south line (FSL) and 2,132 feet FWL of Section 20, approximately 3,100 feet from the SHL (Figure 2). The well will be constructed utilizing a five-string design and all casing strings will be cemented to the surface. The integrity of cementing operations will be verified by way of visual inspection, as well as collection of cement bond logs for all casing strings. The production casing and injection tubing will utilize approximately 300 feet of corrosion-resistant alloy in order to protect the well and lower well components from potentially corrosive conditions.

The proposed open-hole injection zone will target the same reservoir as AGI #1 (the Devonian Thirty-One and Upper Silurian Wristen and Fusselman formations) at depths of approximately 16,080 feet to 17,683 feet TVD. Analysis of these geologic units confirms that they act as excellent closed-system reservoirs that will accommodate the future needs of Piñon for the disposal of acid gas and sequestration of CO₂ from the existing gas treatment facility.

In the area of Independence AGI #2, the proposed injection interval is overlain by a thick interval of dense Woodford Shale (approximately 335 feet) and an additional 796 feet of low-porosity, low-permeability Mississippian carbonates of the Osage and Barnett formations. These units, in total, will provide at least 1,131 feet of excellent caprock that will contain and prevent the upward migration of injected TAG. Additionally, low-porosity intervals of the lower Montoya Formation underlying the targeted injection zone will prevent the downward migration of TAG and protect underlying strata.

The requested maximum allowable operating pressure (MAOP) for Independence AGI #2 is approximately 5,005 psig, which was determined utilizing calculation methods approved by NMOCD which are based on the final specific gravity of the injection stream. At the anticipated average reservoir conditions of 228 °F and 7,370 psig, each MMSCF of TAG will occupy a volume of approximately 2,226 cubic feet (397 barrels). Based on temperature and pressure data collected while drilling and completing the Independence AGI #1, the specific gravity of injectate, under average injection reservoir conditions, is calculated to be approximately 0.78.

Injection simulations were completed to evaluate the impact operation of the proposed Independence AGI #2 would have on the target Siluro-Devonian reservoir over the life of the AGI well. These simulations were completed in collaboration with Sproule utilizing Schlumberger Petrel and Eclipse platforms to construct a geologic simulation grid and simulate acid gas injection, respectively. The pressure modeling conducted for the AGI #1 permit application was updated using data obtained during drilling and testing of AGI #1, which results in the simulation presented herein. After 30 years of operation at the maximum anticipated injection rate of 20 MMSCF per day, coincident with injection by the nearest SWD, the resultant acid gas plume is predicted to extend a maximum of 3.1 miles from the proposed AGI wellbore BHL when including all non-zero concentrations. The maximum potential saturation level observed in all cases is approximately 65% limited to the immediate area of the AGI wellbore.

In total, there are 12 wells within the one-mile radius of the proposed Independence AGI #2, which includes Independence AGI #1. Specific well data are summarized in Appendix A along with relevant plugging documents. Of these wells, eight (8) are active or permitted and four (4) are plugged. Within one mile of the proposed AGI, the injection zone is penetrated by two (2) active disposal wells: West Jal B Deep #1; API #30-025-25046 and Independence AGI #1: API #30-025-48081. The West Jal B Deep #1 is permitted to inject across an interval of Strawn through Fusselman formations and the Independence AGI #1 is permitted to inject into the Devonian through Fusselman formations. One plugged well (West Jal Unit #1; API #30-025-21172) is fully cemented through the proposed injection zone and its current condition is such that it will not be negatively affected by the proposed injection scenario and operation of the proposed Independence AGI #2.

The area surrounding the proposed injection site is arid and there are no natural bodies of water within several miles of the plant. A review of the New Mexico Office of the State Engineer's files shows a total of 15 points of diversion within two miles of the proposed AGI. Within one mile of the proposed AGI, there are two water wells, the closest of which is located approximately 0.34 miles away and has a total depth of 505 feet. All wells within a one-mile radius are shallow and will be protected via the proposed Independence AGI #2 casing and cementing design, which includes a surface casing interval extending to 1,230 feet that will isolate and protect shallow groundwater resources.

In preparing this C-108 application, Geolex conducted a detailed examination of all the elements required to be evaluated in order to prepare and obtain approval for this application for injection. These elements include:

- Identification and characterization of all hydrocarbon-producing zones of wells that surround and are present on the plant site
- The depths of perforated pay intervals in those wells relative to the depth of the target injection zone (Devonian, Wristen, and Fusselman formations)
- The past and current uses of the proposed intervals
- The stratigraphic and structural setting of the targeted zones relative to any nearby active or plugged wells, and other wells penetrating the interval
- The identification of all surface owners, lessees, and other interested parties within a one-mile radius of the proposed injection well and a sample notification letter with which they will be provided (Copies of all notification letters are provided as an attachment to this application)
- Identification and characterization of all plugged and operating wells penetrating the proposed injection zone within a one-mile radius of the proposed injection well

- The details of the proposed injection operation, including general well design and average maximum daily rates of injection and injection pressures
- Reservoir injection simulations to evaluate the resultant effects of injection operations in the area and provide a basic prediction of the resultant acid gas dispersion plume that can be updated as injection continues
- An analysis evaluating the potential for induced-seismic events in response to the proposed injection scenario that includes detailed seismic review and mapping in the area of the proposed well
- Sources of injection fluid and compatibility with the formation fluid of the injection zone
- Location and identification of any freshwater-bearing zones in the area; the depth and quality of available groundwater in the vicinity of the proposed well, including a determination that there are no structures which could possibly allow for communication of the disposal zone with any known sources of drinking water

Based upon this detailed evaluation, Piñon and Geolex have determined that the proposed AGI well is a safe and environmentally-sound project for the disposal of treated acid gas. Furthermore, our analyses demonstrate that the proposed injection well will not negatively affect water resources, nor have any actual or potential impacts on production in the area. This application is fully protective of correlative rights.

2.0 INTRODUCTION AND ORGANIZATION OF C-108 APPLICATION

The completed New Mexico Oil Conservation Division (NMOCD) Form C-108 is included before the Table of Contents of this document and references appropriate sections where data required to be submitted are included.

This application organizes and details all the information required by NMOCD to evaluate and administratively approve the submitted Form C-108 – Application for Authorization to Inject. This information is presented in the following categories:

- A detailed description of the location, construction, and operation of the proposed injection well (Section 3.0)
- An overview of acid gas characteristics and modeling simulation results to predict and provide a basis for evaluating the resultant acid gas plume and resultant reservoir pressure effects resulting from injection operations in the area of the proposed AGI (Section 3.0)
- A summary of the regional and local geology, hydrogeology, and the location of drinking water wells within the area of review (Section 4.0)
- An evaluation of the potential for induced-seismic events in response to proposed and ongoing injection operations in the area of the proposed AGI (Section 4.0)
- The identification, location, status, production zones, and other relevant information on oil and gas wells within the area of review (Section 5.0)
- The identification and required notification for operators and surface landowners that are located within the area of review (Section 6.0)
- An affirmative statement, based on the analysis of geological conditions at the site, that there are no hydraulic connections between the proposed injection zone and any known sources of drinking water (Section 7.0)

In addition, this application includes the following supporting information:

- **Appendix A:** Data tables and maps showing all active, temporarily abandoned, abandoned, and plugged oil and gas wells included within a two-mile radius and the one-mile area of review and associated plugging documents for wells within one mile
- **Appendix B:** Tables and maps summarizing the operators, lessees, and surface owners in the one-mile radius area of review, as well as copies of all notification letters sent to interested parties, proof of delivery, public newspaper notice, and the associated affidavit of publication.
- **Appendix C:** Preliminary drilling-fluid program generated by Valence Drilling Fluids, LLC for the proposed Independence AGI #2 well

3.0 PROPOSED CONSTRUCTION AND OPERATION OF INDEPENDENCE AGI #2

The Independence AGI #2 surface location (SHL) will be drilled at approximately 1,180 feet from the north line (FNL) and 1,578 feet from the west line (FWL) of Section 20, approximately 378 feet south-southeast of Independence AGI #1 and will contain a deviated wellbore placing the bottom hole location (BHL) approximately 3,100 feet south-southeast from the surface hole location (Figure 2). TAG to be injected will be routed from Dark Horse to on-site compression facilities that will compress the acid gas into a dense phase (roughly 1,250 psig), allowing water to be removed. The compressed TAG will then be routed to the wellhead and pumped to injection pressure through NACE-rated (National Association of Corrosion Engineers) pipeline suitable for injection. Design details are provided in the following sections 3.1 and 3.2.

3.1 DESIGN OF INDEPENDENCE AGI #2

The location of the proposed AGI well and the extent of Piñon surface lands where Dark Horse is constructed, are shown in Figure 2, and a general schematic of the injection system is shown in Figure 3. The Independence AGI #2 will be drilled as a deviated well to an anticipated total measured depth (MD) of 18,080 feet (17,683 feet TVD) to the base of the Fusselman formation. The injection zone (approximately 16,080 to 17,683 feet TVD) will be completed as an open-hole interval that includes the Devonian Thirty-one, upper Silurian Wristen and Fusselman, formations.

The AGI plant and injection wells are integrated components of the Dark Horse facility design. The proposed well schematic for the Independence AGI #2 (Figure 4) is similar in design to Independence AGI #1, incorporating all previous NMOCD guidance regarding design expectations for the Independence AGI #1 well. The proposed Independence AGI #2 has been designed such that the two-well AGI system can accommodate the injection of up to 20 MMSCF per day of TAG for a design life of 30 years.

Independence AGI #2 will utilize a five-string casing design (Figure 4). Surface casing (24-inch) will be set in competent strata above the Salado Salt at approximately 1,230 feet TVD/MD. The first intermediate casing (20-inch) will be set through the salt to approximately 3,500 feet TVD/MD within the Yates Formation. The second intermediate 13.625-inch casing will be advanced to approximately 7,200 feet MD (7,058 feet TVD) and will be set into the Brushy Canyon Formation, isolating the Capitan Reef through the deployment of two external casing packers (ECP). The third intermediate casing will be 9.625 inches and will be set in the Atoka Formation at approximately 13,650 feet MD (13,320 feet TVD), protecting active and planned production in the Bone Springs and Wolfcamp formations utilizing an ECP. The production casing (7-inch) will be set in a competent geologic unit in the Devonian Thirty-one Formation at an approximate depth of 16,477 feet MD (16,080 feet TVD) and will also consist of an ECP. The final completion will be constructed as a 5.875-inch, open-hole interval to a total depth of approximately 18,080 feet MD (17,683 feet TVD).

As shown in figures 3 and 4, the Independence AGI #2 well design will include a subsurface safety valve on the production tubing to assure that injected fluids are prevented from flowing back out of the well in the event of a failure of injection equipment. Additionally, the annular space between the production tubing and the well bore will be filled with an inert fluid (corrosion-inhibited diesel fuel with biocide additives) as a further safety measure. These practices are consistent with injection well designs previously supported by NMOCD and approved by the NMOCC for acid gas injection.

Design and material considerations for Independence AGI #2 include: 1) Placement of the subsurface safety valve (SSSV) and permanent injection packer; 2) installation of sufficient casing strings to isolate and protect groundwater resources (Ogallala and Santa Rosa formation groundwater, Rustler Formation

saline groundwater, and the Capitan Reef groundwater) and active producing zones; 3) characterization of the injection zone; and 4) a total depth (TD) ensuring accurate identification and penetration of the target reservoir.

A suitable drilling rig will be chosen for the job that will include an appropriate blowout preventer and choke-manifold system for any unforeseen pressure conditions encountered. Visual inspections of cement returns to the surface will be noted in all casing operations. Casing and cement integrity will be demonstrated by pressure testing and 360-degree cement bond logs recorded for each cement operation. The five casing strings shown in Figure 4 are summarized in the following Table 1.

Table 1. Independence AGI #2 proposed casing schedule

Casing	Hole Size (in.)	Csg. Size (in.)	Pounds Per Foot	Grade	Thread	Top (ft., MD)	Bottom (ft., MD)	Length (ft., MD)	Length (ft., TVD)
<i>Proposed Casing</i>									
Conductor	36	30.0	118	-	Welded	0	122	122	122
Surface	26	24.0	186.4	X-65	XLF	0	1230	1230	1230
1 st Intermediate	22	20.0	133	NT-80DE	GB Butt 21	0	3500	3500	3500
2 nd Intermediate	17.5	13.625	88.2	Q-125HC	BTC	0	7200	7200	7058
3 rd Intermediate	12.25	9.625	47	L-80HC	BTC	0	9000	9000	8824
3 rd Intermediate	12.25	9.625	47	P-110HP	BTC	9000	13650	4650	4496
Production	8.5	7	32	P-110HC	Var. SC	0	16177	16177	15780
Production	8.5	7	32	G3 (CRA)	VAM	16177	16477	300	300
<i>Proposed Tubing</i>									
Inj. Tubing	N/A	3.5	9.2	L-80HC	VAM	0	16127	16127	15730
Inj. Tubing (CRA)	N/A	3.5	9.2	G3 (CRA)	VAM	16127	16427	300	300

Operations to drill Independence AGI #2 will utilize a closed-loop system to manage drilling fluids. Appendix C includes a preliminary drilling fluids program prepared by Valence Drilling Fluids, LLC that outlines the anticipated mud program for the well. All casing strings will be cemented to the surface using appropriate conventional cement and methods. Pressure testing will be completed, and 360-degree cement bond logs will be recorded in order to verify the integrity of all cementing operations.

The 7-inch production casing will be set in a competent bed within the Devonian Thirty-one Formation at approximately 16,477 feet MD as described above (Table 1). The interval will be cemented in two stages utilizing a cement diverter tool (DVT) and ECP at a depth of approximately 13,900 feet MD. As shown in Table 1 above, approximately 300 feet of corrosion-resistant alloy (CRA) casing and tubing will be utilized to protect lower well components and assure well integrity in potentially corrosive conditions. To provide an additional layer of safety, this interval of CRA materials will be cemented utilizing corrosion resistant resin cement (or equivalent), which is specially designed for use in such conditions.

The following table summarizes the preliminary cement program for all proposed Independence AGI #2 casing strings.

Table 2. Independence AGI #2 proposed cementing plan

Casing String	Stage #	Cement Type	# Sacks	Density (#/gallon)	Coverage Interval (MD)
Conductor	1	Redimix	-	-	0' – 122'
Surface	1	Lead: HalCem Tail: HalCem	Lead: 646 Tail: 347	Lead: 13.5 Tail: 14.8	0' – 1,230'
1 st Intermediate	1	Lead: HalCem Tail: HalCem	Lead: 1,657 Tail: 207	Lead: 13.5 Tail: 14.8	0' – 3,500'
2 nd Intermediate	1	Tail: VersaCem H	Tail: 1,198	Tail: 14.5	5,405' – 7,200'
	2	Lead: NeoCem IL2 Tail: VersaCem H	Lead: 486 Tail: 200	Lead: 11.5 Tail: 14.5	3,750' – 5,405'
	3	Lead: EconoCem HLC Tail: HalCem C	Lead: 1,497 Tail: 200	Lead: 12.5 Tail: 14.5	0' – 3,750'
3 rd Intermediate	1	Lead: NeoCem PL2 Tail: VersaCem H	Lead: 1035 Tail: 332	Lead: 11.5 Tail: 14.5	7,300' – 13,650'
	2	Lead: EconoCem HLC Tail: VersaCem H	Lead: 2,586 Tail: 154	Lead: 12.5 Tail: 14.5	0' – 7,300'
Production	1	Lead: NeoCem PT2 Tail: LockCem	Lead: 44 Tail: 44	Lead: 13.2 Tail: 15.3	13,900' – 16,477'
	2	Tail: NeoCem PT	Tail: 1,704	Lead: 13.2	0' -13,900'

Permanent, continuous-recording sensors will be incorporated into the packer assembly and appropriate connections will be run through the annulus and out of the wellhead. These sensors will provide real-time reservoir temperature and pressure conditions. Data will be transmitted to the plant's control room for observation, analysis, and recording. Section 3.3 addresses how those data will be utilized and supplemented in the event of down-hole sensor failure.

The subsurface safety valve (SSSV) will be run into the well at a depth of approximately 250 feet and connected to the surface via a ¼-inch Inconel hydraulic line. From the surface, the line is run to the surface control panel through a stainless-steel line.

NACE issues guidelines for metals exposed to various corrosive gases like those anticipated for this well. For a H₂S-CO₂ stream of acid gas that is dewatered at the surface via successive stages of compression, down-hole components, such as the SSSV and packer need to be constructed of Inconel 925 (or equivalent). The CRA joints utilized in Independence AGI #2 will be constructed of a similar alloy from a manufacturer, such as Sumitomo SM2550 (with 50% nickel content). Additionally, the gates, bonnets, and valve stems within the injection tree will also be nickel coated.

The remainder of the injection tree will be constructed of standard carbon steel components and outfitted with annular pressure gauges that report operating pressure conditions in real time to a gas-control center located remotely from the wellhead. In the case of abnormal pressures or any other situation requiring immediate action, the acid gas injection process can be stopped or diverted to AGI #1 at the compressor, and the wellhead can be shut in using a pneumatically operated wing valve on the injection tree. The SSSV provides a redundant safety feature to shut in the well in case the wing valve does not close properly. After the AGI well is drilled and tested to assure that it will be capable of accepting the target volume of injection fluid (without using acid gas), it will be completed with the approved injection equipment for the acid gas stream.

3.2 GEOPHYSICAL LOGGING

Prior to running the production casing string, open-hole geophysical logging will be performed for the interval underlying the casing string from 13,650 feet MD (13,320 feet TVD) to 16,477 feet MD (16,080 feet TVD) and within the open-hole injection interval from 16,477 feet MD (16,080 feet TVD) to 18,080 feet MD (17,683 feet TVD). Due to the close proximity to Independence AGI #1 (approximately 378 feet), no shallow geophysical logging (excluding gamma ray from MWD) are planned, as these intervals were logged in detail for the AGI #1 location. The proposed open-hole logging suite for deeper geologic section will consist of the following: Gamma ray, formation density, resistivity, neutron porosity, sonic porosity, and 360-degree caliper measurements with integrated borehole volume. Additionally, Fullbore Formation MicroImager (FMI) logs will be recorded along the proposed injection interval, as well as the overlying caprock to verify the integrity and confirm the capability of overlying material to properly sequester the injected TAG. Porosity and permeability characteristics of the proposed injection zone and overlying caprock material may be verified through collection and analysis of sidewall cores if needed.

3.3 RESERVOIR STIMULATION, TESTING, AND PRESSURE MONITORING

Upon the completion of geophysical logging for Independence AGI #2, reservoir stimulation and testing operations will be completed. These operations include acid stimulation of the injection zone and step-rate injection testing.

Stimulation operations will include a two-stage acidizing treatment of the injection zone. First, a spot-acid treatment will be performed in which, approximately 3,000 gallons of 15% hydrochloric acid (HCl) will be displaced along the injection zone for approximately 24 hours. Subsequently, a complete acid stimulation job consisting of approximately 32,000 gallons of 15% hydrochloric acid (HCl) and approximately 8,000 gallons of gelled 15% HCl acid will be injection into the reservoir to open potential reservoir-bound fractures and secondary porosity zones.

In addition to stimulation operations, an injection step-rate test (SRT) will be completed for Independence AGI #2. A temporary string containing a removable packer and tubing will be run to conduct the test and determine the final injection pressure and volumes to ensure the formation parting pressure (fracture pressure) is not exceeded during acid gas injection operations. Once the reservoir has been tested and safe operational conditions have been identified, the final 3.5-inch tubing string and permanent injection packer will be run in and set at an approximate depth of 16,397 feet MD.

The Independence AGI #2 will be equipped with bottom-hole pressure and temperature instrumentation designed to provide real-time monitoring of reservoir conditions as it is installed on a mandrel immediately overlying the permanent injection packer. While this equipment is useful in gathering data that will ultimately be used to evaluate reservoir and well performance, it is only a portion of the overall data collection and analysis program to evaluate the reservoir over time and to compare predicted reservoir performance (discussed in sections 3.4 and 3.5) with actual performance in future reporting periods.

The collection and analysis of injection and annular pressure data has a two-fold purpose. First, to provide an early warning of any mechanical well issues that may arise, and the second to provide data for reservoir performance evaluation. While the initial purpose of monitoring the mechanical integrity of the well only requires the surface injection pressure, temperature, rate, and annular pressure monitoring, the bottom-hole data provides the ability to analyze and evaluate the performance of the reservoir.

Surface pressure/temperature/annular pressure monitoring equipment has extremely high reliability, whereas our experience with bottom-hole pressure/temperature monitoring equipment has shown that this

equipment is more complex and suffers from periodic data collection and transmission issues. We have developed a process to ensure that necessary data are collected in the event of bottom-hole sensor failure. The simultaneous collection of the surface- and bottom-hole data allows us to develop empirical relationships with actual observed data that, in conjunction with the use of established models (such as, AQUAlibrium™, or equivalent) will allow us to fill in gaps when bottom-hole data loss occurs. This approach will allow us to provide NMOCD with reliable monitoring data and interpretations and provides the basis for reservoir evaluation, which will be performed periodically during the lifetime of the well. Additionally, the bottom-hole monitoring equipment for AGI #1 may act as a redundant monitoring system, should a failure occur in the bottom-hole monitoring equipment of Independence AGI #2.

Below is a summary of the overall data collection and analysis program proposed for this well and reservoir:

1. Obtain initial bottom-hole pressure and temperature after drilling (during logging)
2. Perform detailed step-rate injection test and 10-day reservoir pressure fall-off test to provide baseline conditions prior to the commencement of TAG injection
3. Monitor surface parameters (injection pressure, temperature, injection rate, and annular pressure) to provide an early warning system for any potential mechanical integrity issues in the well
4. Monitor bottom-hole pressure/temperature with a sensor and transmitter to provide real-time reservoir condition data for analysis of reservoir performance
5. Use bottom-hole reservoir and surface pressure/temperature to develop a well-specific empirical relationship between observed surface- and bottom-hole data
6. Use TAG/wellbore model to predict bottom-hole P/T conditions based on surface data and test with empirical relationships observed in #5 above to calibrate models
7. Use surface data along with tools in #5 and #6 above to fill in missing bottom-hole data when data drop, or sensor failure occurs
8. In the event of an extended period of bottom-hole pressure/temperature sensor failure, perform periodic bottom-hole pressure monitoring using slickline pressure gauges only if data from such temporary device is necessary to fill in data for relevant analysis
9. After approximately 10 years of operation, perform another detailed step-rate injection test and fall-off test to compare with baseline prior to injection

3.4 INJECTION STREAM CHARACTERISTICS AND MAXIMUM ALLOWABLE OPERATING PRESSURE

The well will be designed and constructed such that it will serve as the injection conduit for a mixed stream of treated acid gas. Based on current estimates, the TAG stream used for the following calculation will be:

- Carbon Dioxide (CO₂) 70%
- Hydrogen Sulfide (H₂S) 30%
- Trace Nitrogen and C₁-C₇ Less than 1%

The maximum total volume of TAG to be injected daily by the two-well system will be approximately 20 MMSCF per day. Pressure reduction valves and controls will be incorporated to assure that maximum surface injection pressure approved by NMOCD will not be exceeded.

The specific gravity of TAG is dependent on the temperature and pressure conditions and the composition of the fluid mixture. It is most accurately calculated using a modification of the Peng-Robinson (PR) equation of state (EOS) model (Boyle and Carroll, 2002). We have calculated the specific gravity of the supercritical TAG phase for the proposed Independence AGI #2 using the AQUAlibrium™ 3.1 software, which employs the modified PR EOS model (Table 3).

The proposed and modeled maximum daily injection rate of 20 MMSCF per day is composed of 70 mol% CO₂ and 30 mol% H₂S. Specific gravities of TAG were determined for these mixtures at the wellhead (2,200 psig, 115 °F), the bottom of the injection interval of the well (7,720 psig, 235 °F), and under average reservoir conditions (7,370 psig, 228 °F) (Table 3).

To determine the proposed maximum surface injection pressure, we utilize the following NMOCD-approved method, which is based on the final specific gravity of the injection stream. Utilizing this method and reservoir temperature and pressure data collected while drilling Independence AGI #1, we propose a maximum allowable operating pressure (MAOP) of approximately 5,005 psig as determined in the calculations that follow:

MAXIMUM ALLOWABLE OPERATING PRESSURE (MAOP) DETERMINATION

$$IP_{Max} = PG(D_{Top})$$

WHERE:

IP_{Max}	=	Maximum Surface Injection Pressure (psig)
PG	=	Pressure Gradient of Injection Fluid (psig/ft)
D_{Top}	=	Depth at top of injection zone

AND

$$PG = 0.2 + 0.433 (1.04 - SG_{TAG})$$

WHERE:

SG_{TAG}	=	Average specific gravity of treated acid gas in the tubing (SG_{TAG} at top = 0.76, and SG_{TAG} at bottom = 0.80; see Table 3)
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For the maximum requested injection volume case, it is assumed that:

$$SG_{TAG} = 0.78 \text{ (Estimate at Reservoir Midpoint)}$$

AND

$$D_{Top} = 16,080 \text{ feet TVD}$$

THEREFORE

$$PG = 0.2 + 0.433(1.04 - 0.78)$$

$$PG = 0.311 \frac{\text{psig}}{\text{ft}}$$

AND

$$IP_{Max} = 0.311 \frac{\text{psig}}{\text{ft}} \times 16,080 \text{ feet}$$

$$IP_{Max} = 5,005 \text{ psig}$$

For this reason, Piñon requests approval for a surface injection MAOP of 5,005 psig for the proposed Independence AGI #2.

Table 3. Anticipated TAG stream characteristics at wellhead, bottom of well, and in reservoir at equilibrium*Proposed Injection Stream Characteristics*

TAG	H ₂ S	CO ₂	H ₂ S	CO ₂	TAG
Gas Volume (MMSCFD)	Conc. mol %	Conc. mol %	Injection Rate lbs/day	Injection Rate lbs/day	Injection rate lbs/day
20	30	70	569536	1716069	2285605

Conditions at Wellhead

Wellhead		TAG							
Temp F	Pressure psig	Gas Vol (MMSCFD)	Comp CO ₂ :H ₂ S	Inject Rate lbs/day	Density kg/m ³	SG	Density lbs/gal	Volume ft ³	Volume bbl
115	2200	20	70:30	2285605	764.09	0.76	6.38	47893	8530

Conditions at Bottom of Well

Wellhead		TAG							
Temp F	Pressure psig	Depth _{Top} ft	Depth _{Bot} ft	Thickness ft	Density kg/m ³	SG	Density lbs/gal	Volume ft ³	Volume bbl
235	7720	16080	17684	1604	802.02	0.80	6.70	45628	8127

Conditions in Reservoir at Equilibrium

Wellhead		TAG							
Temp F	Pressure psig	Avg. Porosity	Swr	Porosity (ft)	Density kg/m ³	SG	Density lbs/gal	Volume ft ³	Volume bbl
228	7370	3.9	0.14	53.79816	821.80	0.82	6.86	44529	7931

3.5 ACID GAS INJECTION PLUME MODELING

To evaluate the impact of operation of the proposed Independence AGI #2 on the target Siluro-Devonian reservoir, Geolex directed Sproule in modifying the original AGI #1 reservoir model with data obtained during drilling and testing of AGI #1. This detailed reservoir evaluation and injection modeling assessment was inclusive of parameters from a previous model completed for AGI #1 and the new data. Components of this evaluation included: 1) Review and incorporation of newly available subsurface data (e.g., geophysical logs, drill-stem and injection tests, 3D seismic survey data) to identify and estimate reservoir characteristics in the area of the proposed AGI well location, and 2) construction/revision of a geologic simulation grid and injection modeling utilizing Schlumberger Petrel and Eclipse platforms, respectively.

3.5.1 Siluro-Devonian Reservoir Evaluation

Upon review of available subsurface data, including those of AGI #1, eight discrete zones were identified within the target injection reservoir delineated by their porosity and permeability characteristics (Table 4). Within these zones, interpreted porosity types include solution-enhanced primary porosity (SEP), solution-enhanced fracture porosity (SEF), and small-fracture porosity (FX). Utilizing available log data, porosity within each zone was estimated utilizing the density and neutron logs.

Table 4. Summary of reservoir characteristics within each discrete zone identified in the Siluro-Devonian injection interval near AGI #2

Zone	Zone Thickness	Φ Type	Φ*Thickness	Avg. Φ	Φ Range	Avg. K (mD)
1	64	SEP + SEF	5.12	8.0%	6-10%	14.3
2	200	FX	4.0	2.0%	1-3%	1.3
3-6	923	Small FX	18.46	2.0%	1-4%	2.1 – 19
7	262	SEP + SEF	23.58	9.0%	4-14%	3.9
8	214	SEP + SEF	19.26	9.0%	4-14%	11.3

Generally, average porosity values within each identified zone range from approximately 1% to 8% and the total proposed Siluro-Devonian injection interval exhibits an average porosity of 3.9%. Average permeability values were estimated from nearby porosity logs and were informed by the AGI #1 injection tests and where additional drill-stem tests, or adequate resistivity log data were available and were further informed by extensive dolomite permeability studies of Lucia et al. (1995).

3.5.2 Acid Gas Injection Modeling

To simulate the proposed injection scenario and better understand the potential resultant acid gas injection plume after 30 years of operation at the maximum anticipated daily injection rate of the 2-well system (20 MMSCF per day), Geolex collaborated with Sproule to revise and update the AGI #1 reservoir injection simulation. This modeling evaluation was completed utilizing Schlumberger Petrel to construct/update a geologic simulation grid informed by the previously described reservoir evaluation and available well data in the area of Independence AGI #2. Schlumberger Eclipse was then utilized to conduct injection simulations representative of the proposed injection scenario described in this application.

The geologic simulation grid constructed as the environment, in which the proposed injection scenario was simulated, is comprised of 292 simulation layers characterizing the eight distinct intervals identified within the proposed injection reservoir. The simulation model area covers approximately 20 square miles and includes nearby subsurface features and relevant nearby injection wells (Figure 5). In total, the simulation grid contains 923,000 cells with areal dimensions of 500 by 500 feet.

Porosity and permeability characteristics within the simulation environment were defined utilizing available well-log data (Including those of AGI #1), 3D seismic survey impedance data, and reservoir characteristics identified during the evaluation discussed in Section 3.5.1. From AGI #1 well data (as well as from West Jal B Deep #1 and West Jal Unit #1) and a synthetic DPHI log generated for the proposed Independence AGI #2 location (up-scaled to reflect enhanced porosity identified in review 3D seismic survey impedance data), a model distribution for porosity, and subsequently permeability, was generated (Figure 6). Model permeability distribution was determined using the Winland R35 method as normal and beta distribution methods generated no instances of simulation cells with permeability less than 0.1 mD.

As only three wells located in the area of Independence AGI #2 have available log data to be utilized in defining model porosity characteristics, 3D seismic survey impedance data were utilized to define key areas of low or high porosity areas within the simulation grid. This was accomplished by implementing five pseudo-well control points, including the proposed AGI #2 (Figure 7), which would allow the injection simulation to evaluate low and high porosity regions within the model environment without altering porosity values across the total area of the model. Also included in Figure 7 are model-generated porosity distribution maps of key intervals identified to be the primary receivers of acid-gas injectate.

Following construction of the model simulation grid, the proposed injection scenario was simulated utilizing the Schlumberger Eclipse simulation platform. Specific scenarios simulated include operation of

the proposed AGI at the maximum anticipated injection rate for the Dark Horse AGI system (20 MMSCFD), an equal distribution of the entire injection volume between both wells, and an unequal distribution to each well for pressure maintenance. All scenarios were run with and without continuous and coincident operation of the nearby West Jal B Deep #1 saltwater disposal well (SWD), not only to estimate the resultant plume size, but also to estimate bottom-hole and surface pressure trends of the AGI system. Model sensitivity testing identified the West Jal B Deep #1 as the only nearby injection source with the potential to influence the dispersion pattern of the Dark Horse AGI system injection plume. Subsurface faults in the area of review were assumed to be non-transmissive of fluids (sealed) as 3D seismic survey impedance data suggest very low to no porosity near these features.

Figures 8 and 9 illustrate the results of Eclipse injection modeling for the proposed Dark Horse AGI system. After 30 years of injection at the maximum anticipated rate of 20 MMSCF per day, the resultant acid gas plume would occupy an area of approximately 8.3 square miles and reach a maximum of 2.4 miles from the AGI #1 wellbore and 3.0 miles from the Independence AGI #2 BHL if the West Jal B Deep #1 well is not in operation. When operating, the plume footprint is predicted to cover an area of approximately 8.2 square miles and extend a maximum of 2.5 miles from the AGI #1 wellbore and 3.1 miles from the Independence #2 BHL when non-zero saturation levels are considered. Table 5 below summarizes the fraction of acid gas being received by each identified zone within the injection reservoir and shows that the primary fluid receivers correspond to upper Devonian, Wristen/Fusselman, and lower Fusselman strata. Saturation levels within the resultant plume reach a maximum of 65% in the immediate area of the AGI wellbore and are observed to be substantially lower in the outer portions of the plume.

Table 5. Summary of injectate fractions predicted to be received by each identified zone within reservoir upon completion of 30-year injection simulation

West Jal B Deep #1 Not Injecting			West Jal B Deep #1 Injecting 30,000 bpd		
Zone #	Total Vol. (MMSCF)	Total Injectate Fraction	Zone #	Total Vol. (MMSCF)	Total Injectate Fraction
1	95,115	44.5	1	97,125	45.5
2	820	0.4	2	977	0.5
3	453	0.2	3	589	0.3
4	8,275	3.9	4	10,832	5.1
5	39,840	18.6	5	45,664	21.4
6	12,152	5.7	6	13,377	6.3
7	9,354	4.4	7	8,305	3.9
8	47,671	22.3	8	36,810	17.2

3.5.3 Potential for Vertical Migration of Acid Gas to Overlying Productive Zones

Results of Dark Horse injection system simulations predict that some fraction of acid gas injectate will exhibit a dispersion pattern such that gas reaches the intersection point of local fault features in the area. These features may be interpreted to represent potential conduits allowing the vertical transmission of acid gas out of the target injection reservoir and into overlying productive zones. To address this concern, Geolex incorporated reservoir data from the completion of Independence AGI #1 and reviewed available drilling fluid records in the area of the proposed AGI System. Additionally, published literature evaluating regional reservoir pressure conditions in the Delaware Basin were utilized

Illustrated in Figure 10 are wells and associated drilling fluid densities utilized while drilling through overlying producing zones in the area of the Dark Horse AGI system. Above the proposed Siluro-Devonian injection reservoir mud weights utilized range from 11.9 to 15.1 pounds per gallon (ppg). For those wells identified that penetrate the proposed injection reservoir, fluid records indicate utilization of

less dense fluids (Average of 9.0 ppg). These records support the interpretation that overlying producing zones in this area are over-pressured with respect to the target injection reservoir. Such interpretations were confirmed during drilling operations of AGI #1 as, even at 11.9 ppg, formation gas from above the injection interval was routed to the flare suggesting the mud column was slightly underbalanced. Additionally, in preparation for drilling the proposed Independence AGI #2, based on AGI #1 procedures and operations, a preliminary Drilling Fluid Program was designed for the well by Valence Drilling Fluids, LLC (Appendix C). Valance recommends utilizing OBM drilling fluids between 11.00 to 13.00 ppg immediately overlying the injection zone (13,044 to 16,477 feet) and 8.4 to 8.6 ppg from 16,080 to 17,683 feet TVD using fresh water.

Over-pressured reservoir conditions within the Lower Bone Springs to Woodford formation strata have been recognized in many areas of the eastern Delaware Basin (Luo et al., 1994) and were observed while drilling Independence AGI #1. Rittenhouse et al. (2016) generated a regional pore-pressure model of the Delaware Basin informed by over 23,700 drilling fluid recordings and more than 4,000 drill-stem and fracture injection tests. As shown in Figure 11, these compiled fluid records and testing operations indicate increased pore-pressure gradients from Lower Bone Springs to Woodford Formation strata expressed in the utilization of heavier drilling fluids. Normal pressure conditions are observed to return underlying the Woodford Shale.

Based on the observations during drilling operations in AGI #1 and the record of local drilling fluids utilized and extensive records compiled by Rittenhouse et al. (2016), the proposed Siluro-Devonian injection reservoir at this location is anticipated to be under-pressured with respect to overlying strata. Under these conditions, there is no anticipated potential for the vertical migration of acid gas out of the target reservoir as the pressure differential between the over- and under-pressured intervals will act as a barrier impeding vertical migration, even along potential conduits.

4.0 REGIONAL AND LOCAL GEOLOGY AND HYDROGEOLOGY

4.1 GENERAL GEOLOGIC SETTING AND SURFACE GEOLOGY

The proposed Independence AGI #2 site is located in Section 20, T25S, R36E in Lea County, New Mexico, approximately six miles west of Jal (Figure 1). The well location lies on the eastern flank of the Pecos River Basin within the Javelina Basin. Referred to as the South Plain by Nicholson & Clepsch (1961), the region exhibits irregular topography without integrated drainage. Surficial sediments commonly consist of unconsolidated alluvium and eolian sands in areas. There are no observed surface bodies of water, or groundwater discharge sites within one mile of the proposed location. The proposed site overlies Quaternary alluvium overlying the Triassic redbeds of the Santa Rosa Formation (Dockum Group), both of which are local sources of groundwater. The thick sequences of Permian rocks that underlie these deposits are described generally below.

4.2 BEDROCK GEOLOGY

The Dark Horse gas-treatment facility and AGI wells are/will be located along the eastern margin of the Delaware Basin, a sub-basin of the larger, encompassing Permian Basin (Figure 12), which covers a large area of southeastern New Mexico and west Texas. The Permian as we know it today began to take form during the Middle to Late Mississippian, with various segments (Delaware Basin, Midland Basin, Central Basin Platform, and North Platform) arising from the ancestral Tabosa Basin. The Delaware Basin was subsequently deepened by periodic deformation during the Hercynian Orogeny of the Pennsylvanian through Early Permian. Following the orogeny, the Delaware Basin was structurally stable and gradually was filled by large quantities of clastic sediments while carbonates were deposited on the surrounding shelves and was further deepened by basin subsidence.

Figure 13 illustrates a generalized Permian Basin stratigraphic column showing the anticipated formations and lithologies that underlie the proposed well site. The entire Lower Paleozoic interval (Ellenburger through Devonian) was periodically subjected to subaerial exposure and prolonged periods of karsting, most especially in the Fusselman and Devonian intervals. The result of this exposure was development of systems of karst-related secondary porosity, which included solution-enlargement of fractures and vugs, and the development of small cavities and caves. Particularly in the Fusselman, solution features from temporally distinct karst events became interconnected with each successive episode of subaerial exposure, so there is the potential for vertical continuity in parts of the Fusselman that could lead to enhanced vertical and horizontal permeability.

In this area of the Permian Basin, major tectonic activity was primarily confined to the lower Paleozoic section, where seismic data show major faulting and ancillary fracturing affecting generally only as high as the lower Woodford Shale. As the proposed Independence AGI #2 lies relatively close to the Central Basin Platform margins, faulting related to the Hercynian orogeny may be present higher in the stratigraphic section.

The sub-Woodford Paleozoic rocks extend down to the Ordovician Ellenburger Formation, which is separated from underlying basement rock by a limited interval of Early Ordovician sandstones and granite wash. The Ellenburger is comprised of dolomites and limestones and is up to several hundred feet in thickness. It is overlain by approximately 880 feet of Ordovician Simpson Formation sandstones and tight limestones, as well as approximately 200 feet of basal Montoya cherty carbonates.

The Silurian Fusselman and Wristen and Devonian Thirty-one formations overlie the Montoya Formation and are comprised of interbedded dolomites and dolomitic limestones that are capped by the Woodford Shale. The Woodford Shale is overlain by several hundred feet of tight Osagean limestone and several

hundred feet of shale and basinal limestones of the Upper Mississippian Chester Formation. The overlying Pennsylvanian Morrow, Atoka, and Strawn formations complete the pre-Permian section. Within this entire sequence, wells have historically produced gas from the Strawn, however, currently all are plugged. The proposed Silurian-Devonian injection zone does not produce economic hydrocarbons in the area of the proposed Independence AGI #2, as demonstrated through the collection of mudlogs, rotary sidewall cores, and reservoir fluid samples taken from AGI #1.

4.3 LITHOLOGIC AND RESERVOIR CHARACTERISTICS OF THE SILURO-DEVONIAN FORMATIONS

The proposed injection interval includes the Devonian Thirty-one and Silurian Wristen and Fusselman formations, collectively referred to as the Siluro-Devonian. These strata commonly include numerous intervals of dolomites and dolomitic limestones with moderate to high primary porosity. Additionally, the proposed injection interval includes significant regions of secondary, solution-enlarged porosity produced during periods where strata were subaerially exposed and significant karst features developed. These karst features most frequently developed in the Fusselman Formation and include solution cavities and enlarged fracture and fracture networks through the Siluro-Devonian section, which can be substantial enough to provide additional permeability that is not readily apparent on geophysical well logs. The porous zones of the Siluro-Devonian are separated by tight limestones and dolomites.

In evaluating the proposed Independence AGI #2 location, Geolex completed an in-depth review of licensed seismic survey data (WesternGeco – South Lea Survey) to support the evaluation that the proposed Siluro-Devonian reservoir exhibited sufficient porosity potential to accommodate the needs of the Independence AGI #2 well. Seismic inversion data, specifically impedance attributes, were evaluated to identify reservoir targets with significant porosity potential in the Siluro-Devonian reservoir. As a result of this review, the proposed section 20 location was selected as it was observed to overly an expansive region of porosity in the upper Devonian, Wristen, and Fusselman formation strata.

Based on the geologic evaluation of the subsurface, acid gas injection is recommended between depths of approximately 16,080 to 17,683 feet TVD (16,477 to 18,080 feet MD). Figure 14 includes a type log of the proposed injection zone that includes the formation tops identified at that location and illustrates the sufficient low-porosity intervals overlying the target injection reservoir. Anticipated formation tops underlying the proposed Independence AGI #2 location are included in the following Table 6. In the area of the proposed well, depth to Devonian strata increases to the southwest and the proposed AGI location lies downdip of a structural high to the east (Figure 15).

Units overlying the proposed injection interval provide excellent caprock to prevent the upward migration of injectate out of the target reservoir. This caprock includes 335 feet of dense Woodford Shale overlain by at least 796 feet of tight Mississippian limestone (Figures 14 and 16). These units will provide an excellent geologic seal above the porous carbonates of the injection zone providing protection to shallow groundwater resources and overlying pay intervals.

Figure 16 includes structural cross section A-A' covering the area of the proposed Independence AGI #2 and highlights the lateral extent of available upper Devonian porosity and the regional coverage of overlying caprock in the area. As shown in Figure 15, there are two faults located approximately one mile east and one mile north from the proposed AGI SHL. These structures were identified through review of licensed 3D seismic survey data and are discussed further in Section 4.6.

Table 6. Anticipated formation tops at proposed Independence AGI # 2 location

FORMATION	DEPTH (TVD)	DEPTH (MD)	FORMATION	DEPTH (TVD)	DEPTH (MD)
Dockum	485	485	Bone Springs	8,467	8,632
Ochoa-Dewey	747	747	Wolfcamp	11,131	11,387
Rustler	1,130	1,130	Strawn	12,004	12,289
Salado	1,720	1,720	Atoka	12,733	13,044
Tansill	3,401	3,401	Morrow	13,541	13,880
Yates	3,461	3,461	Barnett	14,949	15,336
7 Rivers	3,542	3,542	Osage	15,380	15,703
Queen	3,663	3,663	Woodford	15,745	16,142
Capitan Reef	3,935	3,943	Devonian	16,080	16,477
Bell Canyon	5,425	5,484	Wristen	16,467	16,864
Cherry Canyon	6,277	6,364	Fusselman	17,201	17,598
Brushy Canyon	7,058	7,174	Montoya	17,684	18,081

4.4 CHEMISTRY OF THE RESERVOIR FLUIDS

A review of formation waters from the U.S. Geological Survey National Produced Waters Geochemical Database v. 2.3 identified 21 wells with analyses of fluid samples collected from the Siluro-Devonian interval. These samples were collected from wells within approximately 15 miles of the proposed Independence AGI #2 and have been supplemented with samples collection from AGI #1 (Section 20, T25S, R36E). Results of laboratory analysis to determine their composition are summarized in Table 7.

Table 7. Summary of Siluro-Devonian produced water analyses from nearby wells (U.S. Geological Survey National Produced Water Geochemical Database v. 2.3)

API	WELL NAME	CONCENTRATION (parts per million)							
		TDS	HCO3	Ca	Cl	K + Na	Mg	Na	SO4
3002548081	Ind. AGI 1	110000	342	5600	68000	32559	759	31800	664
3002510945	Hill-federal D 1	112959	288	6264	67390	34340	1912	-	2765
3002510947	EC Hill-federal 1	35639	-	1369	22070		592	11608	-
3002511126	JR Holt A3	116415	154	7501	71110	34680	1767	-	1203
3002511196	S. Mattix Unit 3	68431	990	3180	40960	21690	974	-	637
3002511202	S. Mattix Unit 11	67130	853	5075	40430	16950	2348	-	1474
3002511383	Hodges B 3	81712	722	4320	47500	25400	1030	-	2740
3002511556	Blocker-federal 4	57675	595	2850	34030	18370	619	-	1211
3002511747	Ab Coates FED D2	82794	977	2408	47200	28190	851	-	3168
3002511760	Ida Wimberley 5	63817	360	2774	35870	20750	621	-	3442
3002811763	Ida Wimberley 9	61040	900	2680	35600	19560	800	-	1500
3002511765	Carlson-federal A3	66418	690	3002	37650	20390	1339	-	3347
3002511812	Clyde Lanehart 1	99879	687	4753	60410	32610	828	-	591
3002511818	Copper 1	27506	1089	1384	15270	8144	540	-	1079
3002511863	Arnott Ramsay B3	158761	476	17240	100300	35400	5345	-	-
3002511886	Dabbs 1	101036	540	5393	61630	30380	2183	-	910
3002511890	Sam Dabbs 1	85150	675	5368	50260	25130	1395	-	2322
3002511907	Arnott Ramsay F9	58220	367	1546	32790	-	278	20430	2816
3002511950	Farnsworth FED 6	31931	302	7196	20450	1151	2241	-	591
3002512272	LE Elliott FED H1	58687	761	3004	35460	18980	482	-	-
3002512286	JB McGhee 1	62392	552	2696	34380	20060	702	-	4002
3002521601	North Custer Mt 1	>64,000	1610	2136	36230	21830	403	-	1950

These analyses report Total Dissolved Solids (TDS) in the area of the proposed AGI well ranging from 27,506 to 158,761 parts per million (ppm) with an average of 75,981 ppm. The primary constituent in sampled formation waters is the chloride ion, with an average concentration of 45,227 ppm. The closest well, AGI #1, at approximately 3,000 feet away (from BHL), has reservoir fluids with a TDS value of 110,000 ppm, and chloride ions in concentrations of 68,000 ppm.

Based on these data, the Siluro-Devonian reservoir fluids are anticipated to be completely compatible with the acid gas injectate as has been displayed by the continuing operation of AGI #1.

4.5 GROUNDWATER HYDROLOGY IN THE VICINITY OF THE PROPOSED AGI WELL

Based on the New Mexico Water Rights Database from the New Mexico Office of the State Engineer, there are 15 water wells and points-of-diversion located within a two-mile radius of the proposed Independence AGI #2 well, and only two water wells within a one-mile radius. Of these wells, the closest is located approximately 0.34 miles away and has a total depth of 505 feet (Figure 17; Table 8). The remaining wells within the two-mile radius are shallow, collecting water from approximately 240 to 600 feet deep in Alluvium and the Triassic red beds. The shallow freshwater aquifer will be protected as the proposed well design isolates shallow zones via a five-string casing design including a surface casing interval that extends to 1,230 feet within the Rustler Formation, effectively isolating shallow groundwater resources (Figure 4).

The area surrounding the proposed injection well is arid and there are no bodies of surface water within a two-mile radius.

Table 8. Water wells within one mile of the proposed Independence AGI #2 (Retrieved from the New Mexico Office of the State Engineer's Files on October 10, 2020)

POD #	Source	Use	Owner	LAT (NAD83)	LONG (NAD83)	Distance (miles)	Depth (feet)	Date Completed
CP 1170 POD 5	Shallow	Commercial	NGL South Ranch	32.121417	-103.296667	0.34	505	11/2014
CP 465 POD 1	Shallow	Commercial	NGL South Ranch	32.119465	-103.299882	0.53	560	08/1963

Geolex conducted a review of *Geology and Ground-Water Conditions in Southern Lea County, New Mexico* (Nicholson and Clebsch, 1961) to identify published groundwater data representative of nearby water wells in the area of the proposed Independence AGI #2. Table 9 summarizes the wells identified in this review and the results of those analyses.

Table 9. Chemical analysis results of samples collected from water wells in the area of the proposed Independence AGI #2 (Nicholson and Clebsch, 1961 – *Geology and Groundwater Conditions in Southern Lea County, New Mexico*)

Historical Owner	Location (T-R-S)	Location (Qtr-Qtr)	Depth (ft)	Ca (ppm)	Mg (ppm)	Na+K (ppm)	HCO ₃ (ppm)	SO ₄ (ppm)	Cl (ppm)	NO ₃ (ppm)
Sun Oil Co.	25-37-15	NE/4 NE/4	-	307	98	271	145	737	610	9
City of Jal	25-37-19	NE/4 NE/4	500	55	49	170	376	280	71	0.4
City of Jal	25-37-19	SE/4 NE/4	450	34	43	175	264	286	54	0.5
City of Jal	25-37-20	NW/4 SW/4	70	-	-	-	150	145	168	7.6

Our analysis confirms that the proposed well poses no risk of contaminating groundwater in the area as 1) The proposed well design includes material considerations to protect shallow groundwater resources, and

2) there are no identified conduits that would facilitate migration of injected fluids to freshwater-bearing strata.

4.6 POTENTIAL FOR INDUCED SEISMICITY IN THE AREA OF THE DARK HORSE INJECTION SYSTEM

To evaluate the potential for seismic events in response to injected fluids, Geolex conducted an induced-seismicity risk assessment in the area of the Dark Horse Injection System, which includes Independence AGI #1 and #2. This estimate 1) models the impact of seven injection wells over a 30-year injection period, and 2) estimates the fault-slip probability associated with the simulated injection scenario. This analysis was completed utilizing the Stanford Center for Induced and Triggered Seismicity's (SCITS) Fault Slip Potential (FSP) model developed by Walsh and Zoback, 2016.

To identify subsurface structures in the area of the proposed AGI well, Geolex evaluated and interpreted licensed seismic survey data (WesternGeco South Lea Survey) covering the Lea County area of interest. Based on this review, Geolex identified eight subsurface faults in the area of the Dark Horse Injection System (Figure 18). The closest fault is observed to be located approximately 0.98 miles east of the proposed well/injection system. Major faults in the area (those exhibiting significant lateral extent) generally strike NNW-SSE with minor faults striking NE-SW and NW to SE.

Due to the location of faults relative to active and proposed injection wells and the general low density of injection wells in the immediate area of the proposed AGI well, it is anticipated that the disposal scenario will not pose any elevated risk of injection-induced fault slip. To support the interpretation that these structures would not be affected by operation of the injection system as proposed, a fault-slip probability analysis was completed to quantify the risk associated with injection operations in the area of AGI #2, and although the risk of induced seismicity is low, a seismic monitoring station was installed at the facility prior to the commencement of injection into AGI #1. The station transmits data to the New Mexico Tech Seismic Network and will aid the state in seismicity interpretations.

To calculate the fault-slip probability for this injection scenario, input parameters characterizing the local stress field, reservoir characteristics, subsurface features, and injected fluids are required. Parameters utilized and their sources for this study area are included in Table 10. Additionally, Table 11 details the injection volume characteristics and locations of the disposal wells modeled in this scenario. To ensure the model simulations provide a conservative estimation of induced-seismicity risk, injection wells included in the simulations were modeled utilizing their maximum anticipated daily injection volumes as recorded by NMOCD records. Due to the minimal reported injection volume of the Jal North Ranch SWD #1, a potential of 10,000 bpd was assumed in the event that injection rates increase as a result of increased need or any future workover that may improve the injectivity of this well.

Table 10. Input parameters and source material for FSP model simulations

Modeled Parameter	Input Value	Variability (+/-)	UOM	Source
<i>Stress</i>				
Vertical Stress Gradient	1.05	0.105	psig/ft	Nearby well estimate
Max Horizontal Stress Direction	N75E	5	Deg	Lund Snee & Zoback, 2018
Reference Depth	17000		ft	Nearby well evaluation
Initial Res. Pressure Gradient	0.43	0.043	psig/ft	Lund Snee & Zoback, 2018
				Nearby well evaluation
A _φ Parameter	0.6	0.06	-	Lund Snee & Zoback, 2018
Reference Friction Coefficient (μ)	0.6	0.06	-	Standard value
<i>Hydrologic</i>				
Aquifer Thickness	1500	0	ft	Nearby well evaluation
Porosity	3.5	0.35	%	Nearby well evaluation
Permeability	20	2	mD	Nearby well evaluation
<i>Material Properties</i>				
Density (Water)	1040	40	Kg/m ³	Standard value
Dynamic Viscosity (Water)	0.0008	0.0001	Pa.s	Standard value
Fluid Compressibility (Water)	3.6 x 10 ⁻¹⁰	0	Pa ⁻¹	Standard value
Rock Compressibility	1.08 x 10 ⁻⁹	0	Pa ⁻¹	Standard value
<i>Acid Gas Properties @ 7,370 psig & 228 °F</i>				
Density	821.80	-	kg/m ³	AQUALibrium™
Dynamic Viscosity	8.067 x 10 ⁻⁵	-	Pa.s	AQUALibrium™

Table 11. Location and characteristics of injection wells modeled in the FSP assessment

#	API	Well Name	LAT	LONG	Volume (bbls/day)	Start (year)	End (year)
1	3002548081	Independence AGI #1	32.120855	-103.291021	4265	2020	2052
2	-	Independence AGI #2	32.111454	-103.288812	4265	2022	2052
3	3002524287	Crosby Deep #2	32.089508	-103.166733	6800	2010	2052
4	3002545795	Sholes Deep SWD #1	32.110998	-103.201266	30000	2020	2052
5	3002527085	Jal N. Ranch SWD #1	32.139347	-103.203911	10000*	2017	2052
6	3002525046	West Jal B Deep #1	32.132091	-103.280708	30000	2015	2052
7	3002543360	Kimberly SWD #1	32.083537	-103.194274	20000	2019	2052

*NMOCD records include no information regarding the maximum anticipated injection volume

Daily maximum injection volumes utilized in the fault-slip probability model range from 4,265 to 30,000 bpd (Table 11). In submission of this application, Piñon is requesting approval to operate the proposed Independence AGI #2 for a period of at least 30 years, however, the duration of the FSP model simulation was increased to 40 years in order to characterize the reservoir effects of disposal wells that are currently operating and have been in operation since 2010. Figure 19 shows the resultant pressure front and single-well radial pressure solutions, as predicted by the FSP model, after 30 years of injection at the maximum injection rates.

For this study, limitations of the FSP model required a conservative approach be taken in determining the fault-slip probability of the injection scenario. Specifically, the FSP model is only capable of considering a single set of fluid characteristics and this study aims to model an injection scenario that includes saltwater disposal (SWD) and acid gas injection (AGI) systems. To ensure a conservative fault-slip probability estimate, the proposed AGI well was simulated utilizing the characteristics of a SWD

injectate. This approach yields a more conservative model prediction as water displays greater density, dynamic viscosity, and is significantly less compressible than acid gas. For comparison, characteristics of acid gas at the anticipated reservoir conditions, as modeled by AQUALibrium™, are shown in Table 10.

Generally, faults considered in this assessment are predicted by the Stanford FSP model to have very low potential for injection-induced slip and the proposed AGI system is not predicted by the model to contribute significantly to the estimate of risk (Table 12, Figure 20). Table 12 summarizes the predicted pressure change along each fault segment and includes the model-derived pressure change necessary to induce slip for each feature. Fault-slip probability values range from 0.00 to 0.05 with the majority of fault segments predicted to have zero probability of slip (Table 12). Major faults (faults 4, 7, and 8) in the area, which would have the greatest energy release potential upon slip, are predicted to have zero probability for slip in response to the modeled injection scenario. As shown in Table 12, when the contribution of the proposed AGI well is excluded, no significant changes in slip probability are predicted.

Table 12. Summary of model-simulation results showing the required pressure change to induce fault slip, actual change in pressure as predicted by the FSP model, probability of fault slip at the end of the 30-year injection scenario, and fault-slip probability when the proposed AGI is excluded from simulation

Fault #	Segment #	Δ Pressure necessary to induce fault slip	Actual Δ Pressure at 2052	Fault Slip Potential at 2052	FSP (excluding AGI)
1	1	3137	109	0.00	0.00
	2	4357	103	0.00	0.00
	3	1786	93	0.00	0.00
	4	1201	83	0.01	0.01
2	5	1197	253	0.05	0.05
3	6	6869	186	0.00	0.00
	7	6298	168	0.00	0.00
4	8	5645	277	0.00	0.00
	9	4610	194	0.00	0.00
	10	5005	117	0.00	0.00
	11	2709	70	0.00	0.00
	12	5302	63	0.00	0.00
	13	6339	57	0.00	0.00
	14	6899	51	0.00	0.00
	15	4197	46	0.00	0.00
5	16	1101	192	0.03	0.03
	17	1085	199	0.02	0.02
6	18	1554	234	0.04	0.04
7	19	6012	290	0.00	0.00
	20	6680	241	0.00	0.00
	21	6914	133	0.00	0.00
	22	6758	61	0.00	0.00
	23	6931	33	0.00	0.00
	24	6590	25	0.00	0.00
8	25	6508	250	0.00	0.00
	26	6327	334	0.00	0.00
	27	5455	228	0.00	0.00
	28	6305	174	0.00	0.00
	29	6684	89	0.00	0.00

In summary, no structures included in the modeled simulations are predicted to be at increased risk for injection-induced slip in response to the injection scenario presented. Features estimated to have a non-

zero slip potential are generally smaller-scale features and predicted probabilities are very low (≤ 0.05). Furthermore, subsequent model simulations in which contribution from the proposed AGI is excluded illustrate that operation of the AGI well will have little impact on conditions near the identified faults in the area due to significantly lower proposed injection volumes in comparison to nearby SWD wells, however, any occurrence of seismicity in the area will be detected with the aid of the active seismic monitoring station installed on the facility grounds.

5.0 OIL AND GAS WELLS IN THE INDEPENDENCE AGI #2 AREA OF REVIEW AND VICINITY

Appendix A summarizes in detail all NMOCD recorded wells within a one- and two-mile radius of the proposed Independence AGI #2. These wells are shown in figures A-1 and A-2 and include active, plugged, cancelled, and permitted well locations. Table A-1 details all wells within two miles of the proposed AGI well location and wells located within one mile are summarized in Table 13 below.

In total, there are 51 wells within a two-mile radius of the proposed Independence AGI #2 (Appendix A, Figure A-1, Table A-1). Of these, there are 10 active wells, 31 permitted, and 10 plugged (five wells have been cancelled). Active wells in the area include one SWD well completed across Strawn through Fusselman zones and nine active oil wells completed in various strata.

Within one mile of the proposed AGI, there are 12 wells, of which, eight are active or permitted and four are plugged (Figure A-2, Table 13).

Table 13. Wells located within one mile of the proposed Independence AGI #2 (Additional details are provided in Appendix A Table A-2)

API	Well Name	Pool	Status	LAT (NAD83)	LONG (NAD83)	TVD
3002521172	West Jal Unit #001	Strawn	Plugged	32.1176	-103.28074	17086
3002538059	Dinwiddie St COM #001	Strawn	Plugged	32.12485	-103.27646	12192
3002521039	West Jal 18 #1	Wildcat	Plugged	32.1276	-103.30099	12950
3002509778	Federal #1	Wildcat	Plugged	32.12124	-103.29781	3891
3002520857	West Jal B #1 (SWD)	Delaware	Active	32.12848	-103.28498	12275
3002546393	Nandina 25 36 31 Federal COM #124H	Wolfcamp	New	32.10848	-103.30525	-
3002548081	Independence AGI #1	Devonian-Fus.	Active	32.12084	-103.29103	17750
3002548615	Blue Marlin State #212H	Wolfcamp	New	32.10940	-103.30559	-
3002549118	Blue Marlin Federal COM #202H	Wolfcamp	New	32.10940	-103.30562	-
3002549121	Blue Marlin Federal COM #215H	Wolfcamp	New	32.10940	-103.30570	-
3002549196	Blue Marlin Federal COM #212H	Wolfcamp	New	32.10940	-103.30554	-
3002525046	West Jal B Deep #1 (SWD)	Miss.-Fus.	Active	32.13209	-103.28071	18945

There are three wells within two miles of the proposed AGI location that penetrate the anticipated injection interval (Table 14), one of which is Independence AGI #1. Of the other two wells, one is an active SWD (West Jal B Deep #1) located approximately 1.0 miles from the proposed SHL. This well was drilled to a total depth of 18,945 feet and is permitted to inject through perforated intervals of Strawn through Fusselman strata. Despite being granted approval for injection into the Fusselman (approved June 2014), NMOCD records document no reports of work to drill out plugged intervals at 14,200 feet. One Form C-103 (submitted November 2018) indicates the intent of BC&D operating to drill out these intervals, but no subsequent reports confirming completion of this work have been identified. Additionally, reported injection volumes for this well do not appear to exhibit any significant increase that might indicate this work was completed.

The remaining well penetrating the proposed interval is the plugged West Jal Unit #1, located approximately 0.67 miles from the proposed AGI SHL. Final plugging operations were completed in April 1984 and all relevant plugging reports and documents are included in Appendix A. The well is

properly cemented through the injection zone and it is not anticipated to be negatively affected by the operation of the AGI wells.

Table 14. Wells located within two miles of Independence AGI #2 that penetrate the proposed injection interval

API	Well Name	Pool	Status	LAT (NAD83)	LONG (NAD83)	TVD
3002521172	West Jal Unit #1	Del., Strawn	Plugged	32.117596	-103.280739	17086
3002525046	West Jal B Deep #1	Strawn-Fus.	Active	32.132091	-103.280708	18945
3002548081	Independence AGI #1	Devonian-Fus.	Active	32.12084	-103.29103	17750

6.0 IDENTIFICATION AND REQUIRED NOTIFICATION OF OPERATORS, SUBSURFACE LESSEES, AND SURFACE OWNERS WITHIN THE AREA OF REVIEW

On behalf of Piñon, Ameredev II, LLC completed a detailed review of Lea County, New Mexico land records to obtain a listing of all operators, oil and gas mineral leases, and surface owners within a one-mile radius of the proposed AGI well. Appendix B includes the results from that review.

Table B-1 summarizes the surface owners, identifies the operators, and lists working interest owners in the one-mile area of review. The table is inclusive of all persons that were provided notice and a complete copy of the C-108 application. Figure B-1 shows the location of the surface owners and active operators, and Figure B-2 includes information on leaseholders and mineral ownership within one mile of the proposed AGI well location.

Written notification of Piñon's intent to submit the Independence AGI #2 C-108 application were sent to identified interested parties on November 1, 2021, via FEDERAL EXPRESS. As an attachment to these notifications, each party was provided a complete copy of the Independence AGI #2 application and supporting materials. Appendix B includes all notice letters that were sent to interested parties, as well as proof of delivery. Additionally, public notice of Piñon's application was published in the Hobbs News Sun on Tuesday, October 26, 2021. The complete publication and associated Affidavit of Publication is included in Appendix B. To date, no parties identified within the Independence Area of Review, or other members of the public have raised objection or requested additional information regarding the proposed AGI well.

7.0 AFFIRMATIVE STATEMENT OF LACK OF HYDRAULIC CONNECTION BETWEEN THE PROPOSED INJECTION ZONE AND KNOWN SOURCES OF DRINKING WATER

As part of the work performed to support this application, a detailed investigation of the structure, stratigraphy, and hydrogeology of the area surrounding the proposed Independence AGI #2 well has been performed. The investigation included the analysis of available geologic data and hydrogeologic data from wells and literature identified in sections 3.0, 4.0, and 5.0 above including related appendices. Based on this investigation and the analysis of these data, it is clear that there are no open fractures, faults, or other structures which could potentially result in the communication of fluids between the proposed injection zone and any known sources of drinking water or oil/gas production in the vicinity, as described above in sections 4.0 and 5.0 of this application.

I have reviewed this information and affirm that it is correct to the best of my knowledge.

Alberto A. Gutiérrez, C.P.G.
President
Geolex, Inc.®

Signature: _____

Date: 11/1/2021



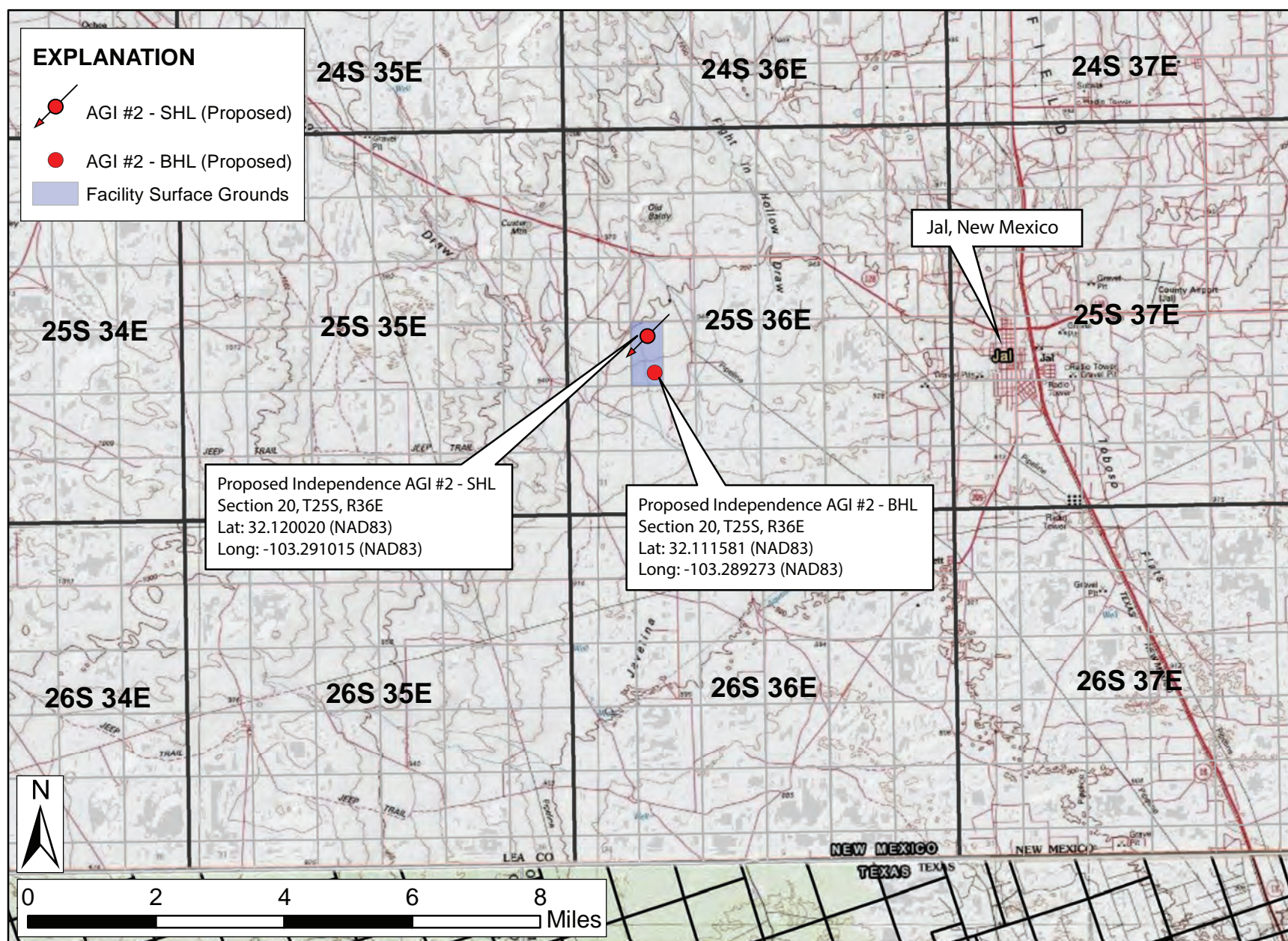


Figure 1. General location map for proposed AGI well in Section 20 (T25S, R36E) approximately six miles west of Jal, New Mexico

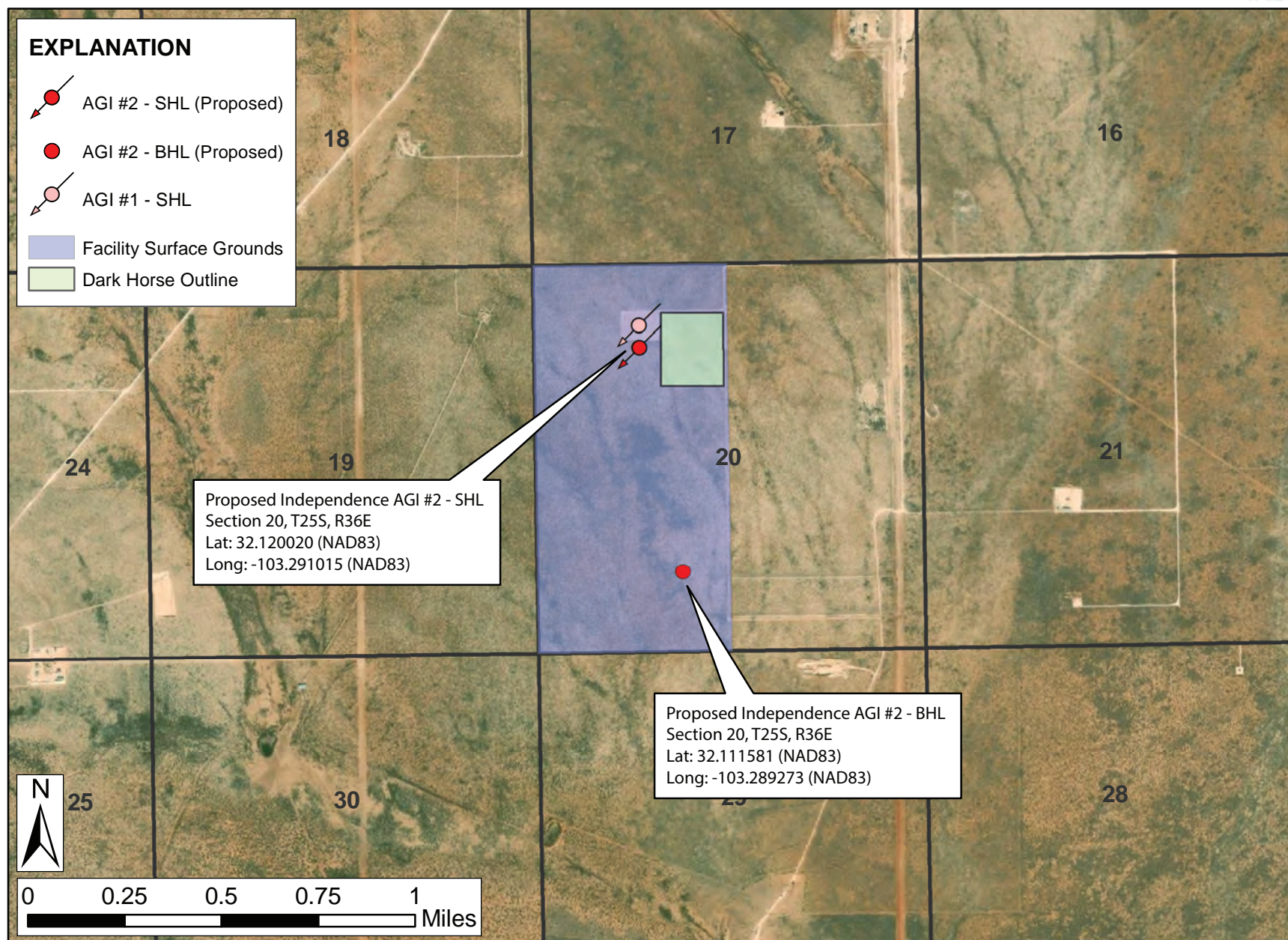


Figure 2. Detailed locaton map showing the proposed Independence AGI #2 and Piñon surface lands where plant facilities have been constructed

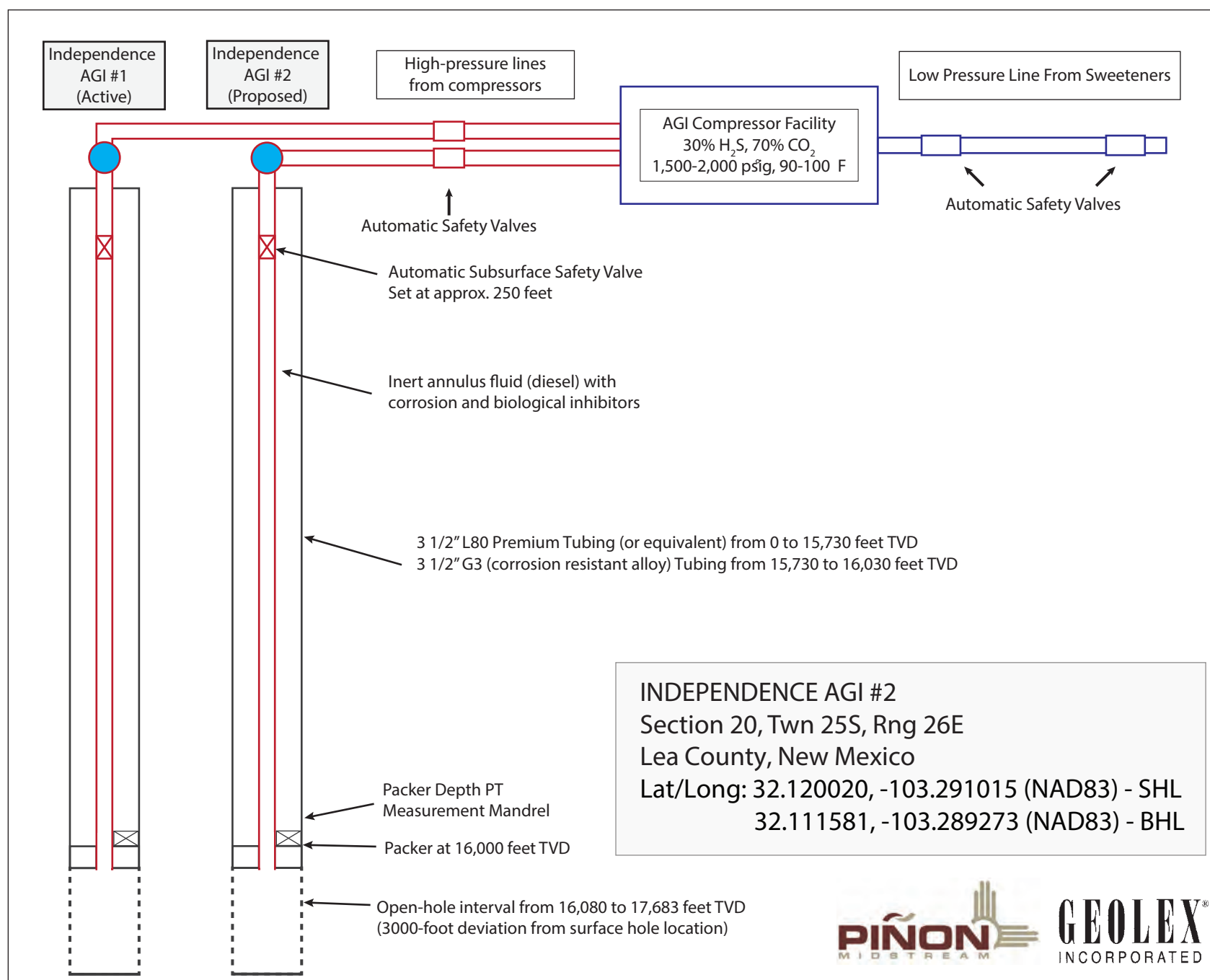


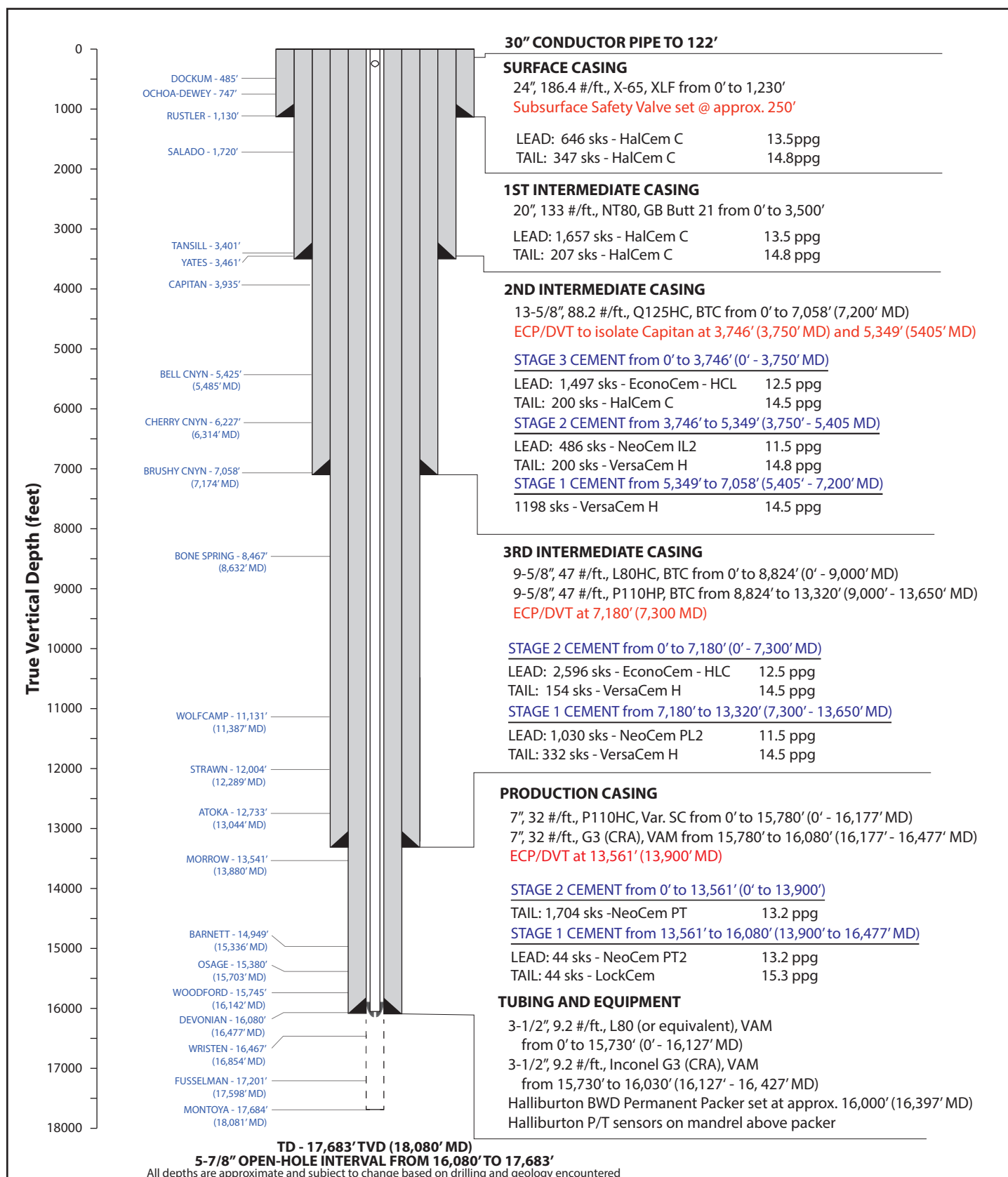
Figure 3. Schematic of surface facilities, proposed Independence AGI #2 and existing Independence AGI # 1



WELL SCHEMATIC

INDEPENDENCE AGI #2

S20 - T25S - R36E



10/12/2020

Figure 4. Well design consisting of a surface string of casing, three intermediate strings, and a production string with associating tubing/equipment and cement types

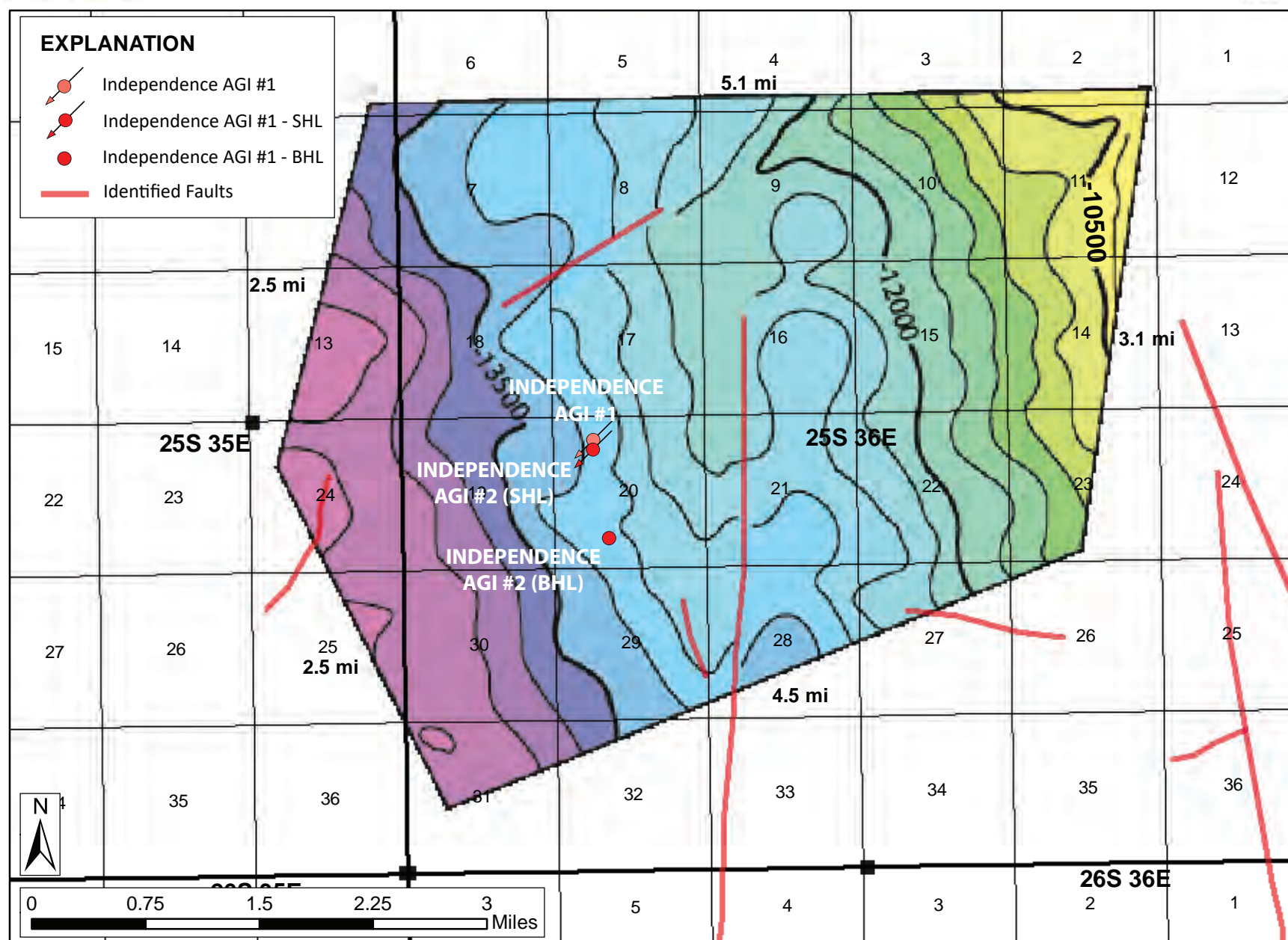
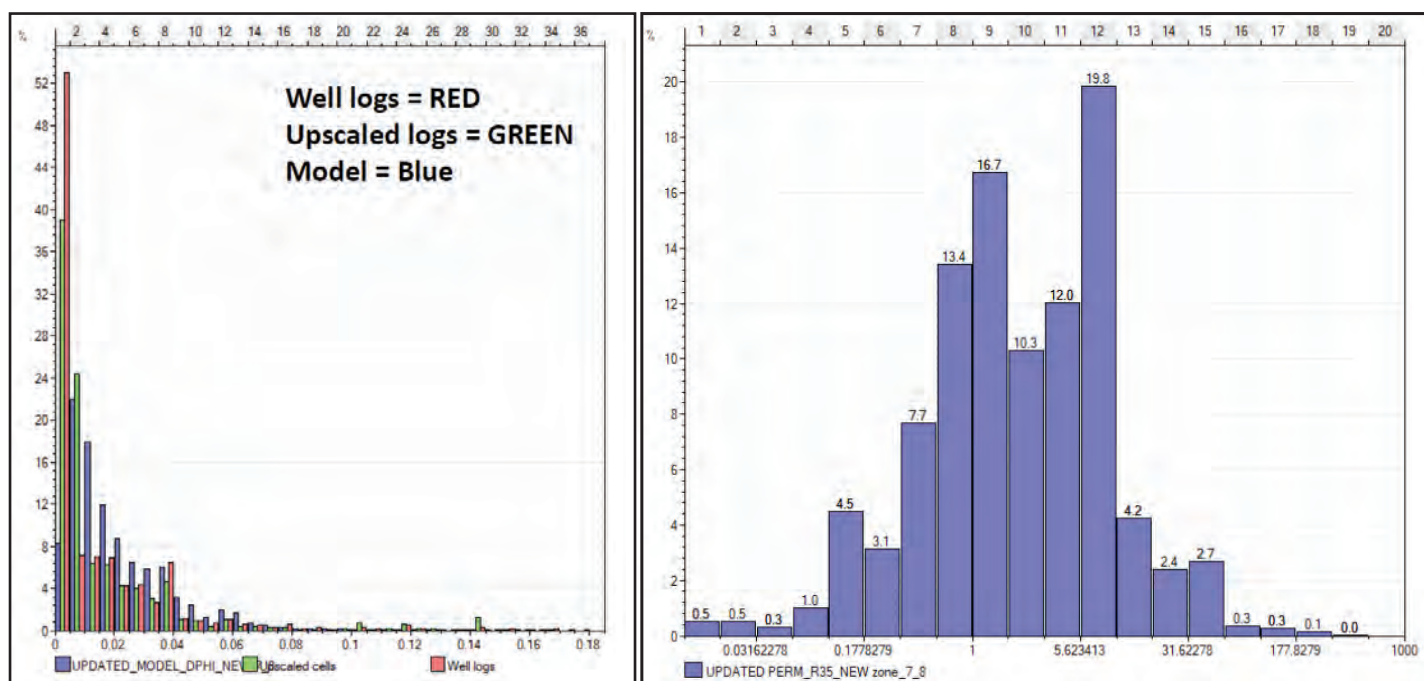


Figure 5. Location map illustrating areal extent of geologic model grid constructed to simulate the proposed Dark Horse Treatment Facility injection scenario. Total coverage area of approximately twenty square miles.

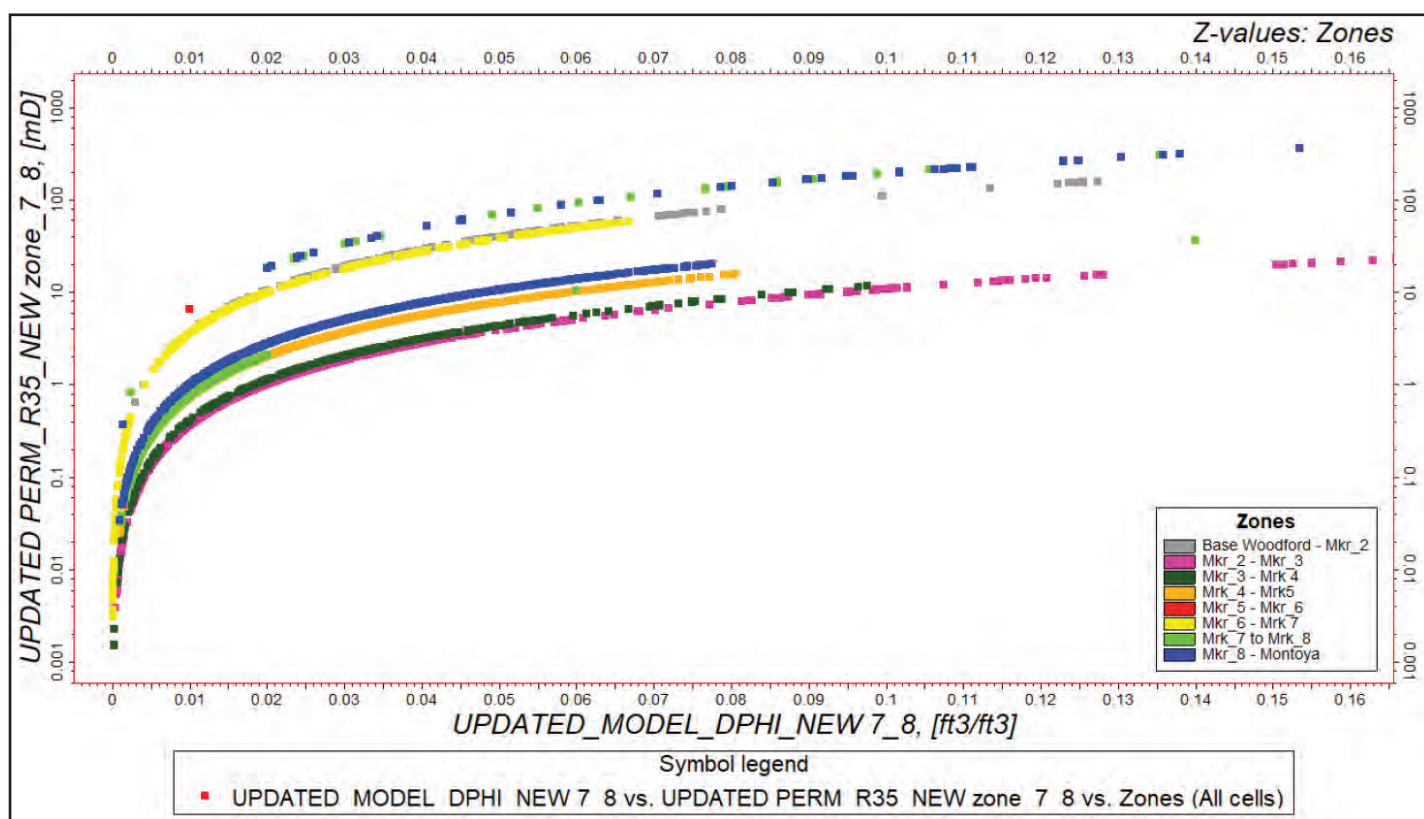


MODEL SIMULATION GRID CHARACTERISTICS



DPHI Distribution
(3 available well logs)

Winland R35 Permeability Distribution



Permeability (Winland R35) vs. Model DPHI

Figure 6. Geologic model porosity and permeability distribution generated from available wells (n=3), and further informed by AGI #1 data, drill-stem and injection test, and 3D seismic survey impedance data

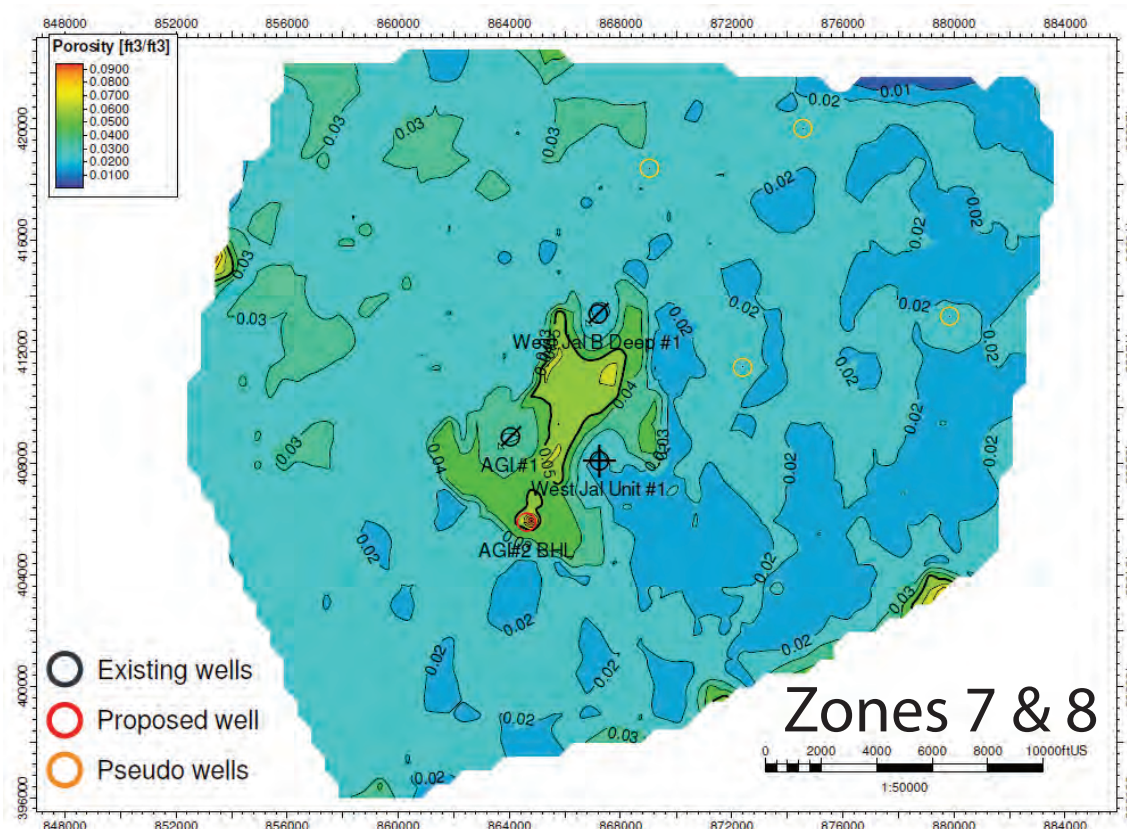
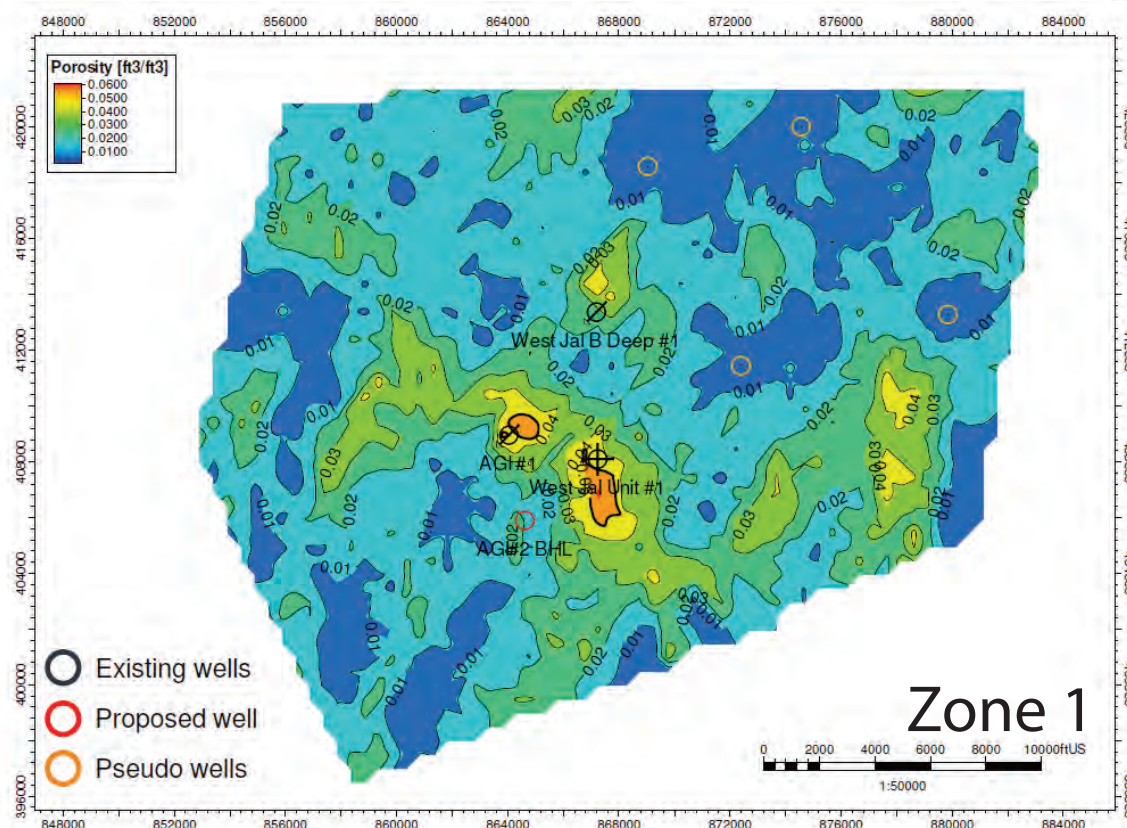


Figure 7. Model porosity distribution maps for two intervals (Zone 1 and Zones 7 & 8) predicted to receive the greatest fraction of acid gas injectate. Pseudo wells implemented to characterize high and low porosity zones identified via review of seismic impedance data are included.

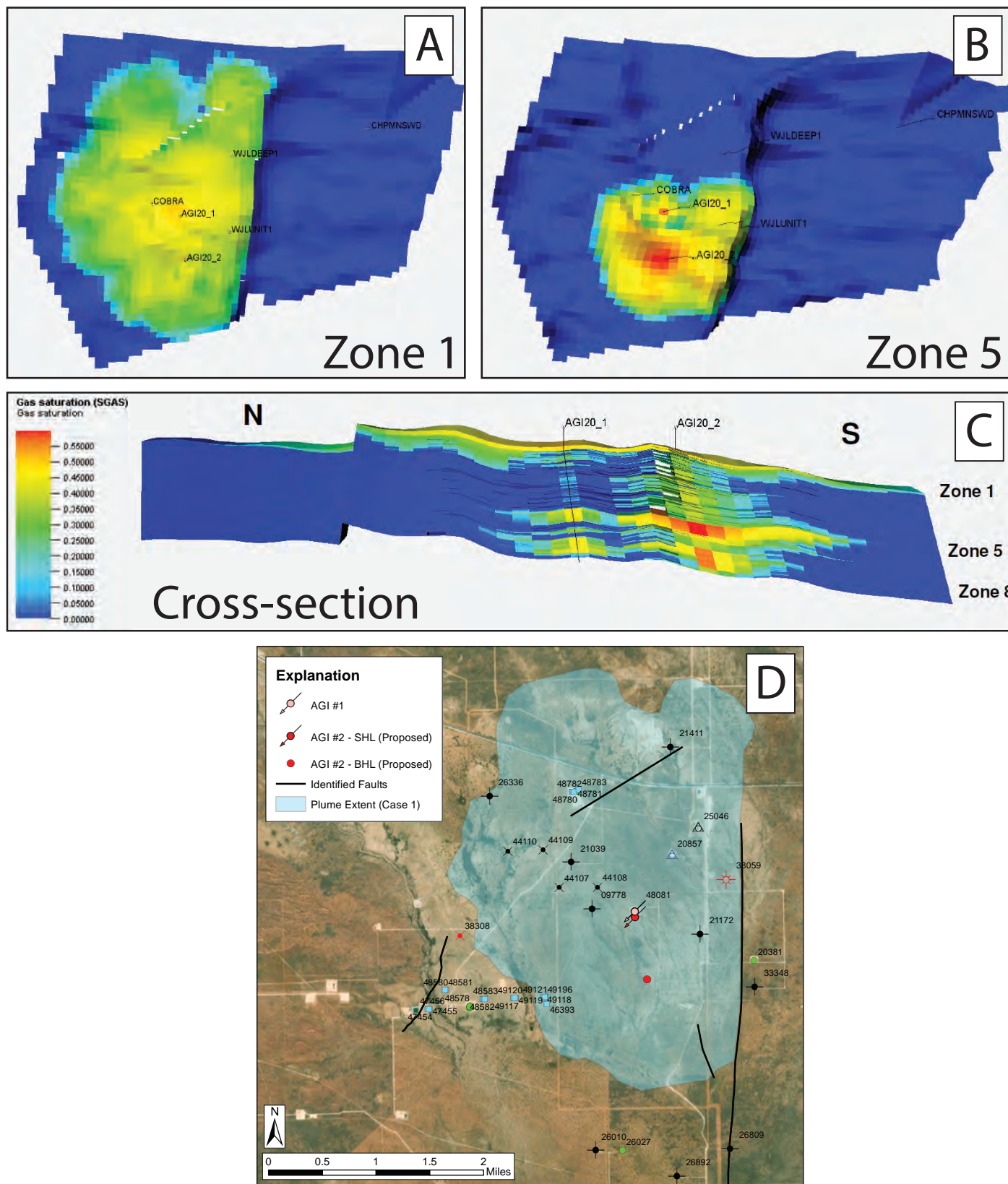


Figure 8. Summary of ECLIPSE injection simulation results when West Jal B Deep #1 is not actively injecting. Panels A and B include gas saturation maps for identified zones 1 and 5; panels C illustrates the cross-sectional view of the resultant injection plume; panel D illustrates combined zone 1 and zone 5 plume footprint

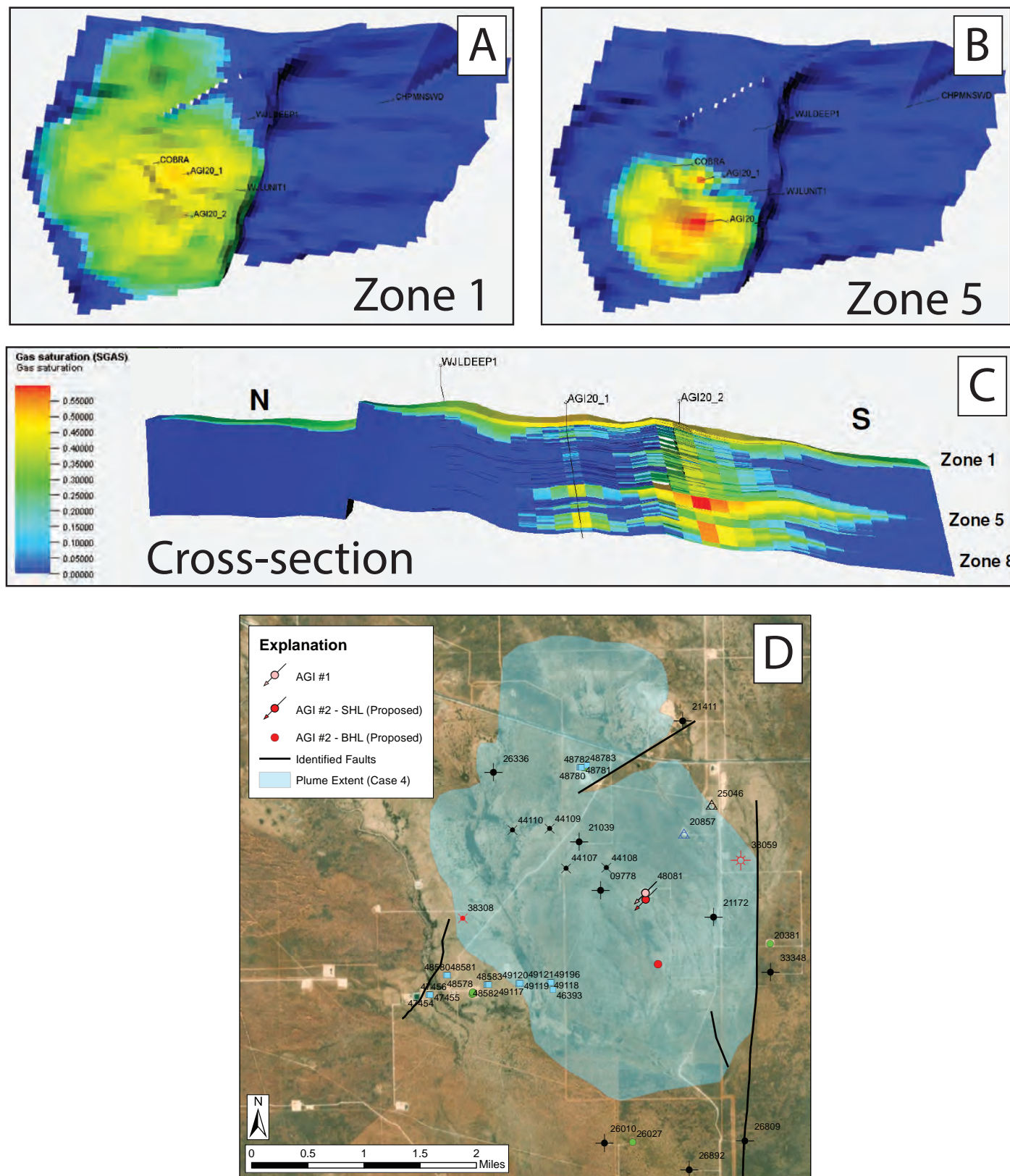


Figure 9. Summary of ECLIPSE injection simulation results when West Jal B Deep #1 is actively injecting. Panels A and B include gas saturation maps for identified zones 1 and 5; panels C illustrates the cross-sectional view of the resultant injection plume; panel D illustrates combined zone 1 and zone 5 plume footprint

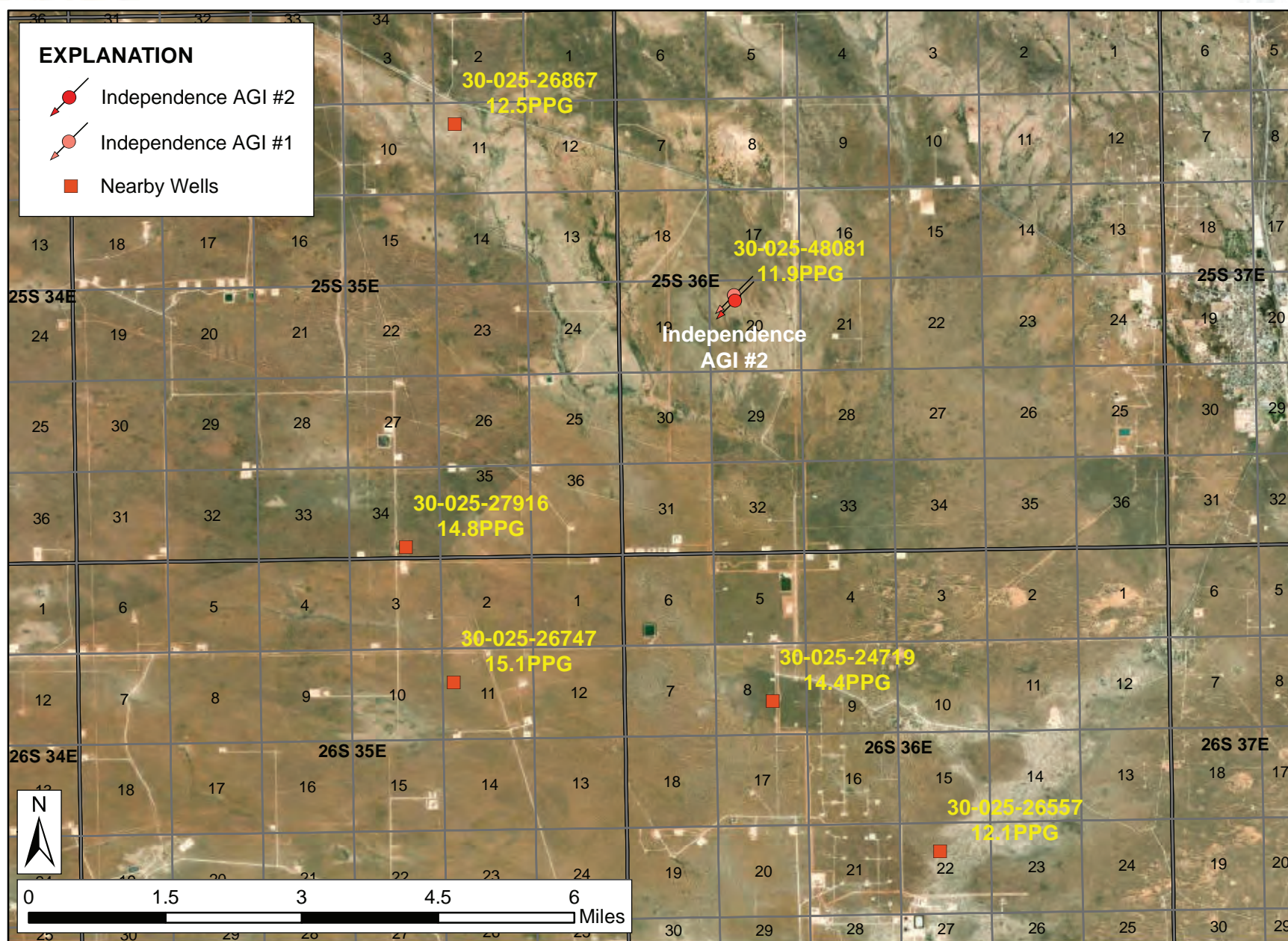


Figure 10. Location map summarizing drilling fluid weights utilized while drilling through overlying productive intervals and strata directly above the proposed injection zone

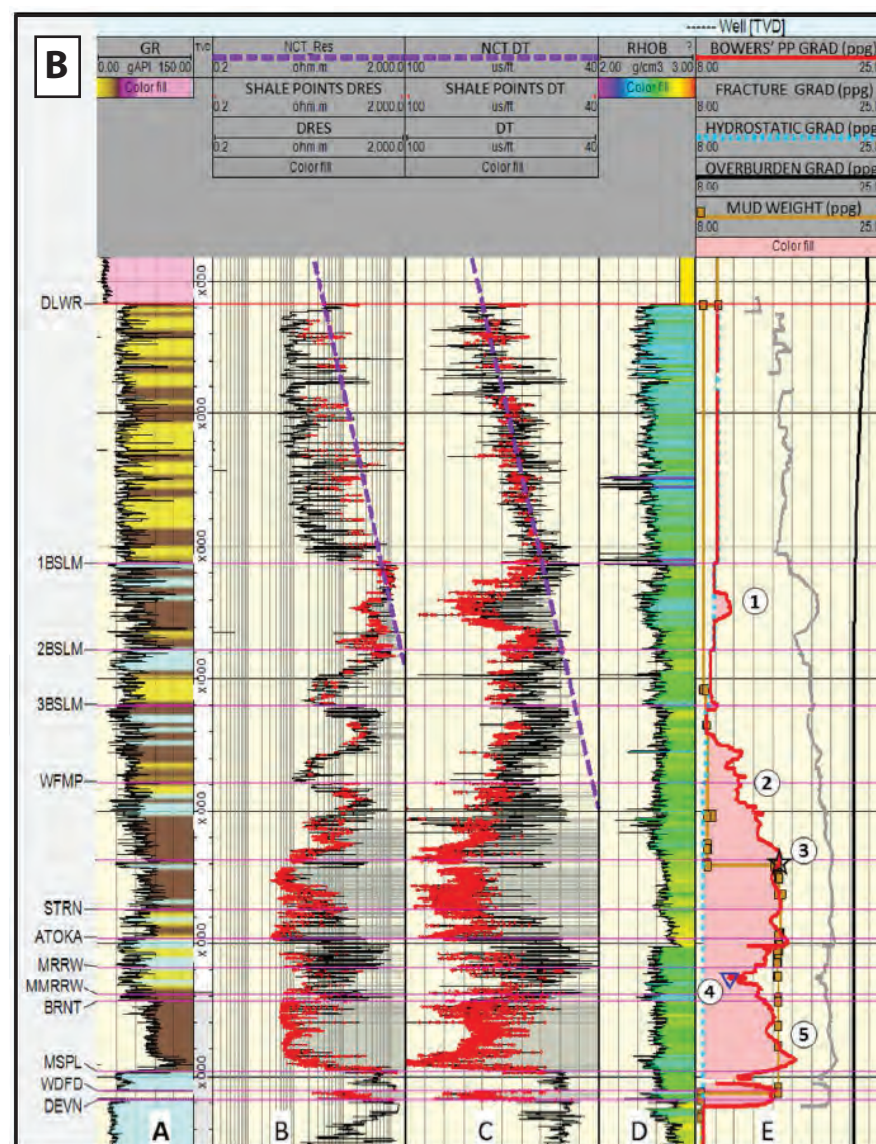
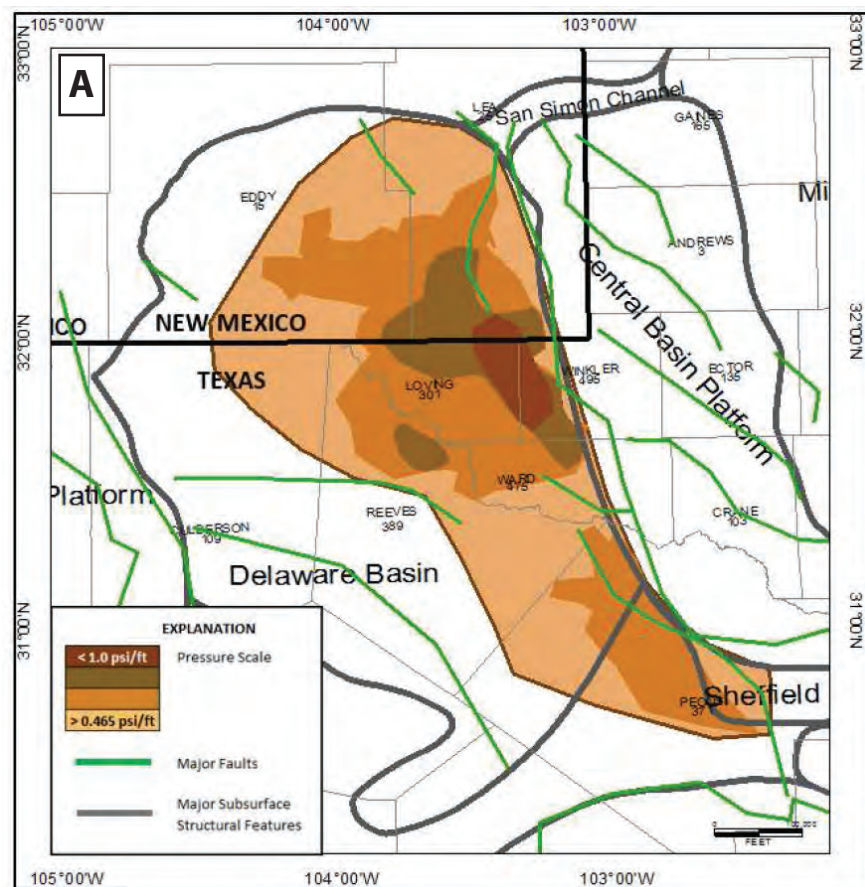


Figure 11. Mapped extent of present day overpressure in the Delaware Basin (Panel A) and example log response (Panel B) illustrating stratigraphic onset of over-pressured intervals and associated drilling fluid densities (modified from Rittenhouse et al., 2016)

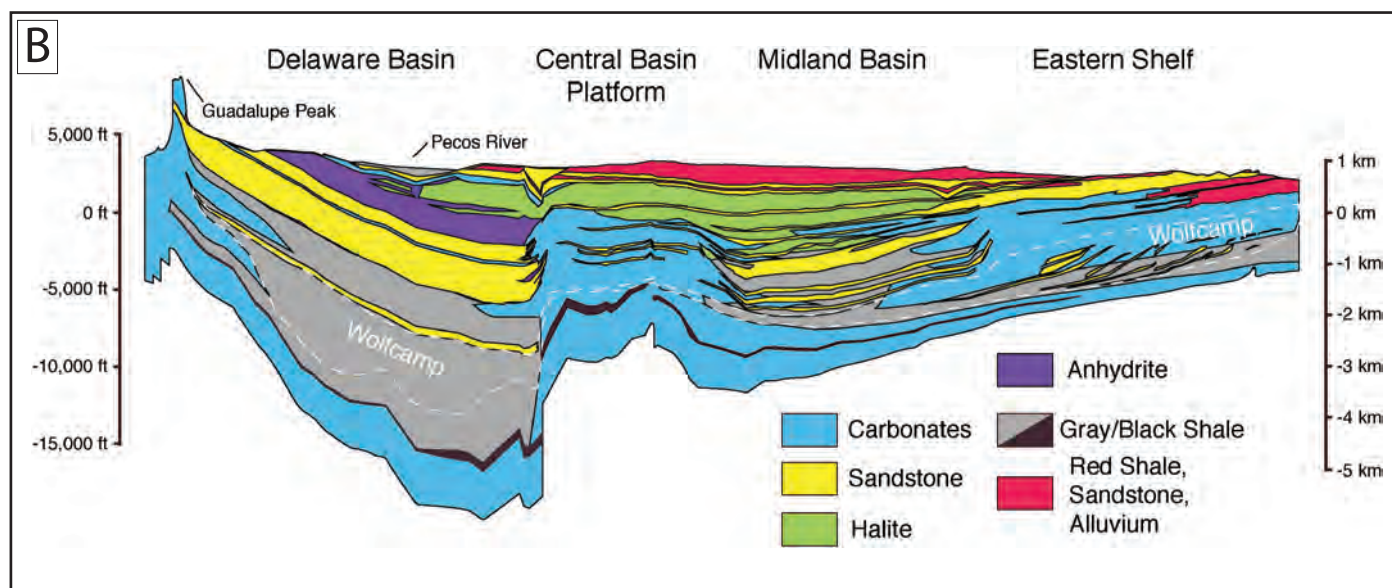
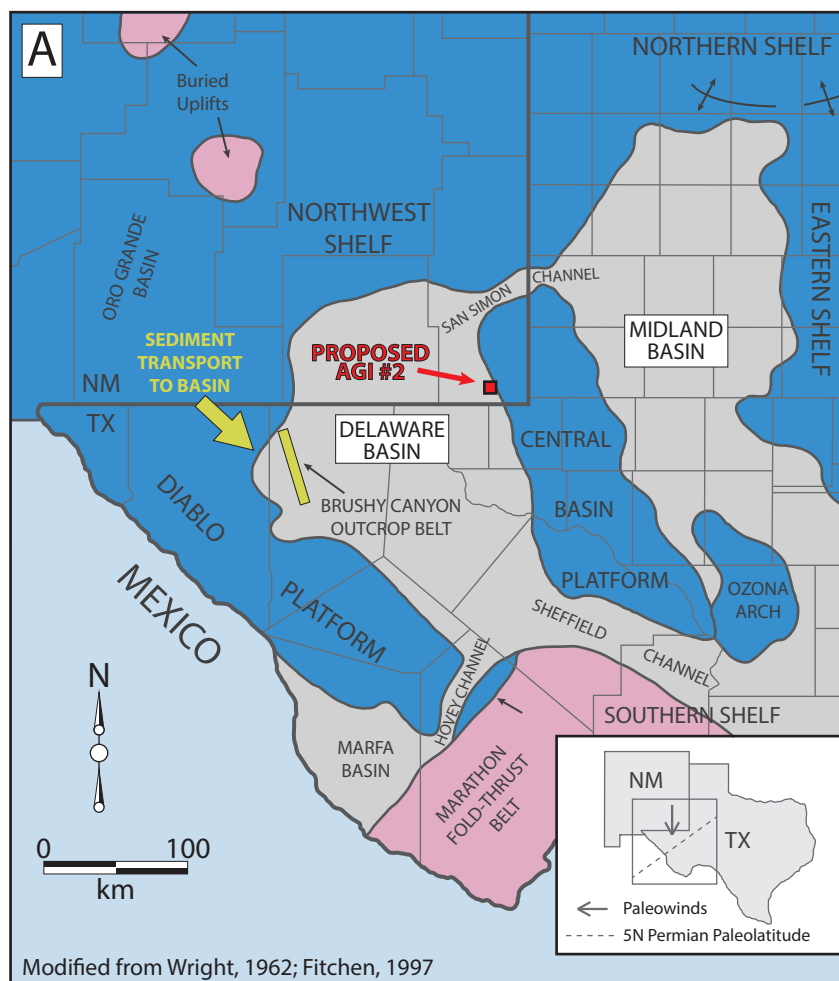


Figure 12. Structural setting (panel A) and general lithologies (panel B) of the Permian Basin



Generalized stratigraphic correlation chart for the Permian Basin region

SYSTEM	SERIES/ STAGE	NORTHWEST SHELF	CENTRAL BASIN PLATFORM	MIDLAND BASIN & EASTERN SHELF	DELAWARE BASIN	VAL VERDE BASIN
PERMIAN	OCHOAN	DEWEY LAKE RUSTLER SALADO	DEWEY LAKE RUSTLER SALADO	DEWEY LAKE RUSTLER SALADO	DEWEY LAKE RUSTLER SALADO CASTILE	RUSTLER SALADO
	GUADALUPIAN	TANSILL YATES SEVEN RIVERS QUEEN GRAYBURG SAN ANDRES GLORIETA	TANSILL YATES SEVEN RIVERS QUEEN GRAYBURG SAN ANDRES GLORIETA	TANSILL YATES SEVEN RIVERS QUEEN GRAYBURG SAN ANDRES SAN ANGELO	★ DELAWARE MT. GROUP BELL CANYON CHERRY CANYON BRUSHY CANYON	TANSILL YATES SEVEN RIVERS QUEEN GRAYBURG SAN ANDRES
	LEONARDIAN	CLEARFORK YESO WICHITA ABO	CLEARFORK WICHITA	LEONARD SPRABERRY, DEAN	★ BONE SPRING	LEONARD
	WOLFCAMPIAN	WOLFCAMP	WOLFCAMP	WOLFCAMP	★ WOLFCAMP	WOLFCAMP
PENNSYLVANIAN	VIRGILIAN	CISCO	CISCO	CISCO	CISCO	CISCO
	MISSOURIAN	CANYON	CANYON	CANYON	CANYON	CANYON
	DESMOINESIAN	STRAWN	STRAWN	STRAWN	★ STRAWN	STRAWN
	ATOKAN	ATOKA	ATOKA	ATOKA	ATOKA	(ABSENT)
	MORROWAN	MORROW BEND	(ABSENT) BEND	(ABSENT ?) BEND	MORROW BEND	(ABSENT)
MISSISSIPPIAN	CHESTERIAN MERAMECIAN OSAGEAN KINDERHOOKIAN	CHESTER MERAMEC OSAGE KINDERHOOK	CHESTER MERAMEC OSAGE "BARNETT"	CHESTER MERAMEC OSAGE "BARNETT"	CHESTER MERAMEC OSAGE "BARNETT"	MERAMEC OSAGE "BARNETT"
DEVONIAN		WOODFORD DEVONIAN	KINDERHOOK WOODFORD DEVONIAN	KINDERHOOK WOODFORD DEVONIAN	KINDERHOOK WOODFORD DEVONIAN	KINDERHOOK WOODFORD DEVONIAN
SILURIAN		SILURIAN (UNDIFFERENTIATED)	SILURIAN SHALE FUSSELMAN	SILURIAN SHALE FUSSELMAN	MIDDLE SILURIAN FUSSELMAN	MIDDLE SILURIAN FUSSELMAN
ORDOVICIAN	UPPER	MONTOYA	MONTOYA	SYLVAN MONTOYA	SYLVAN MONTOYA	SYLVAN MONTOYA
	MIDDLE	SIMPSON	SIMPSON	SIMPSON	SIMPSON	SIMPSON
	LOWER	ELLENBURGER	ELLENBURGER	ELLENBURGER	ELLENBURGER	ELLENBURGER
CAMBRIAN	UPPER	CAMBRIAN	CAMBRIAN	CAMBRIAN	CAMBRIAN	CAMBRIAN
PRECAMBRIAN						

Figure 13. General stratigraphy and producing zones (red stars) in the immediate area of Ameredev AGI #2 (modified from Yang and Dorobek, 1995)

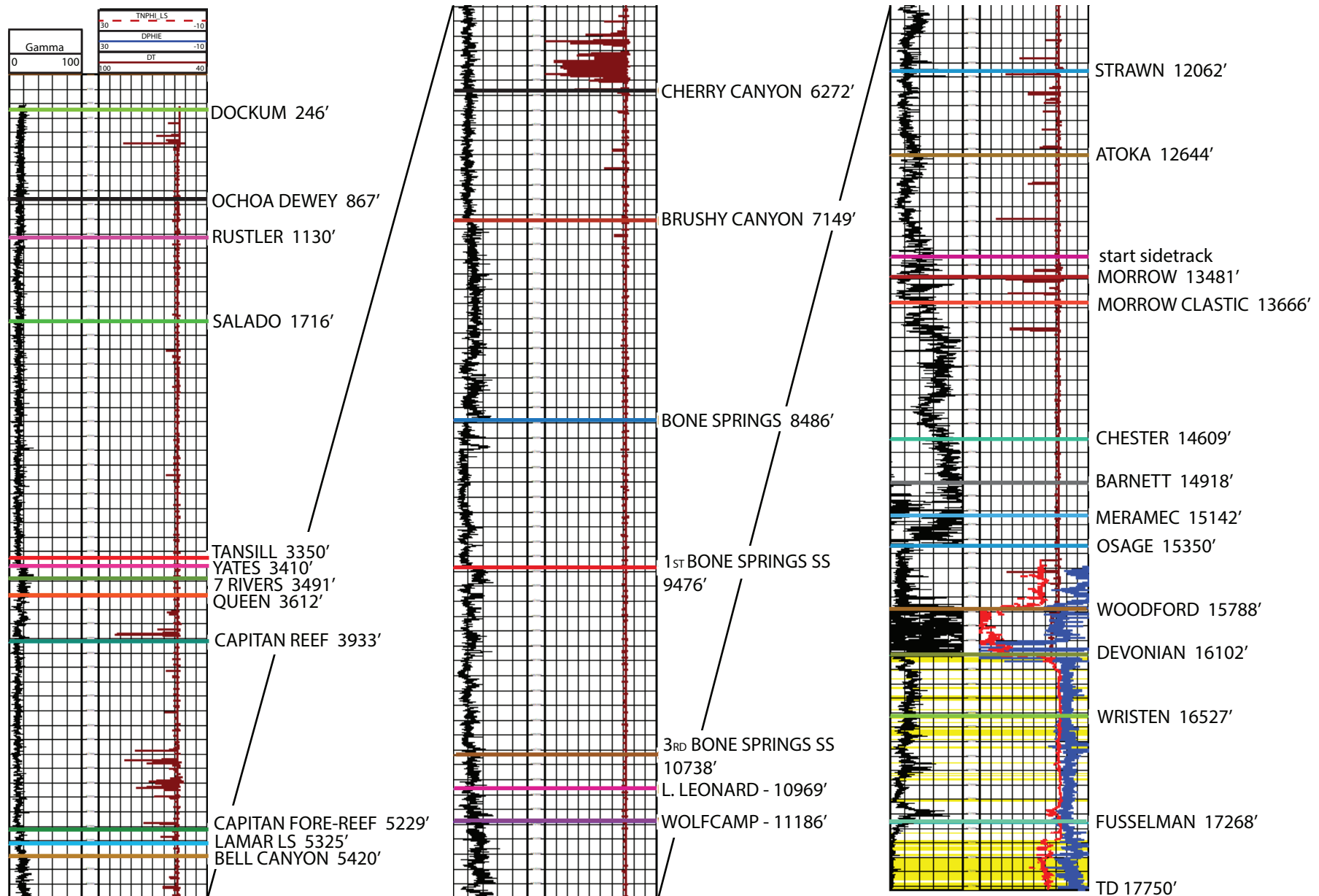


Figure 14. Type log of nearby well, Independence AGI #1 (API #30-025-48081), illustrating identified formation tops in TVD. Estimated formation tops for the proposed Independence AGI #2 are included in Table 6

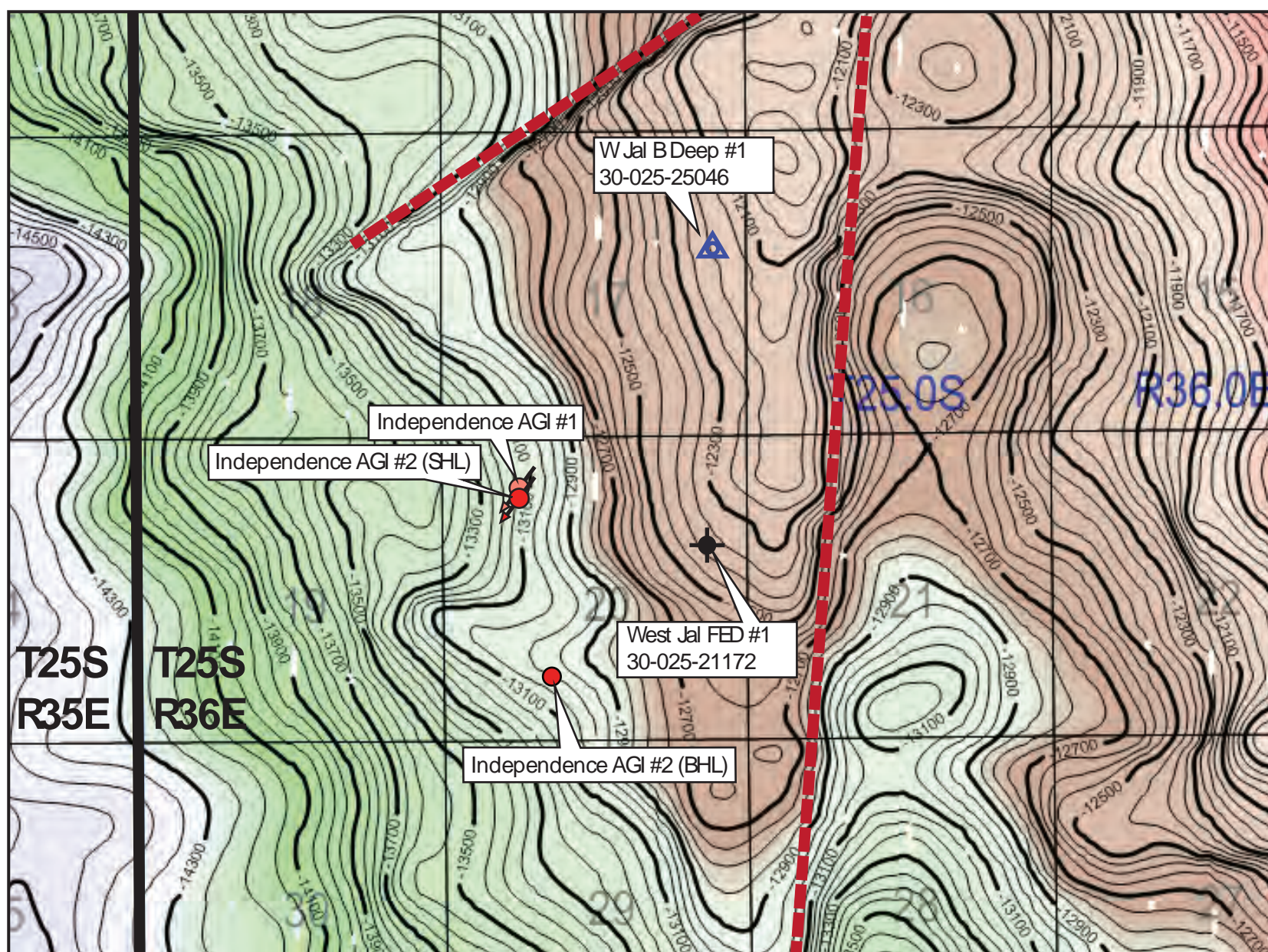


Figure 15. Structure contour map showing the top of the Siluro-Devonian target reservoir. Two faults identified in review of 3D seismic data are shown with red dashes



30-025-48081-0000
AMEREDEV OPERATING, LLC
INDEPENDENCE AGI #1
 890 FNL, 1443 FWL
 T25S R36E S20

PINON MIDSTREAM (BHL)
INDEPENDENCE AGI #2
 1033 FSL, 2132 FWL
 T25S R36E S20

30-025-21172-0000
MCH PETROLEUM SERV
WEST JAL FEDERAL #1
 1980 FNL, 660 FEL
 T25S R36E S20



A

A'

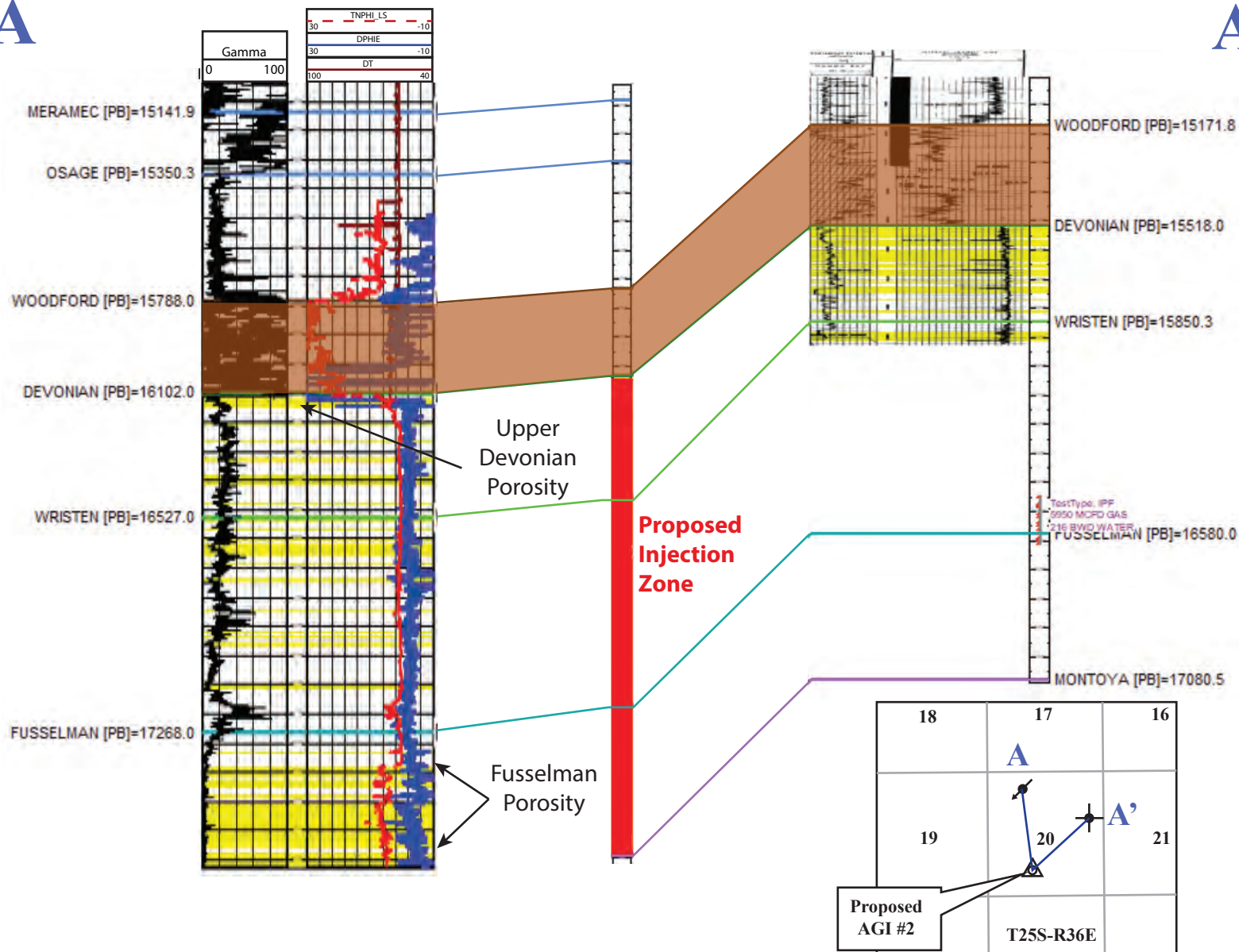


Figure 16. Structural cross-section A-A' showing porosity profile from nearby wells penetrating the proposed injection interval and regional extent of overlying Woodford Shale caprock. Proposed injection zone from 16,080 feet TVD to 17,683 feet TVD (red bar).

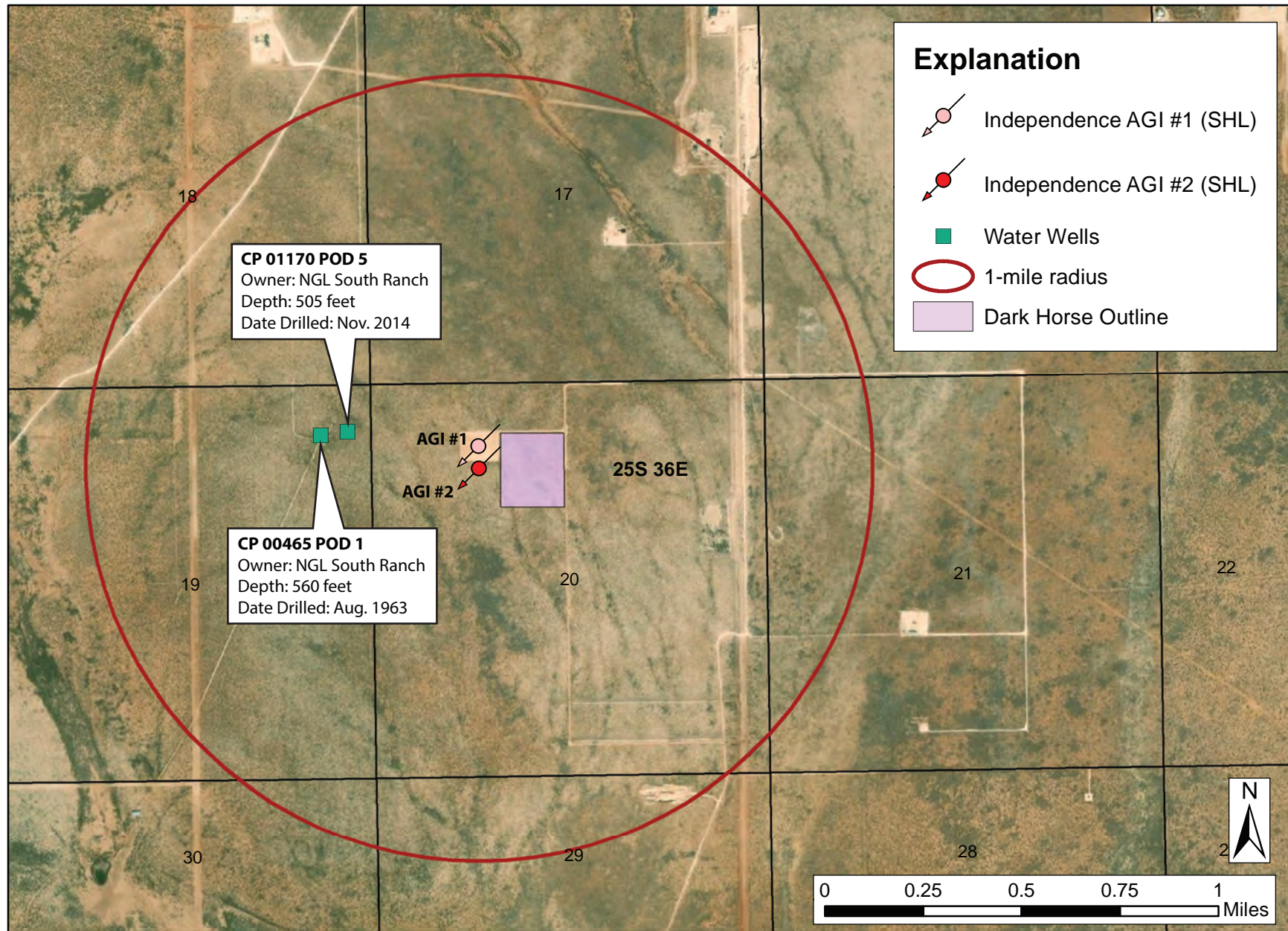


Figure 17. Water wells within one mile of the proposed Independence AGI #2 surface hole location (SHL)

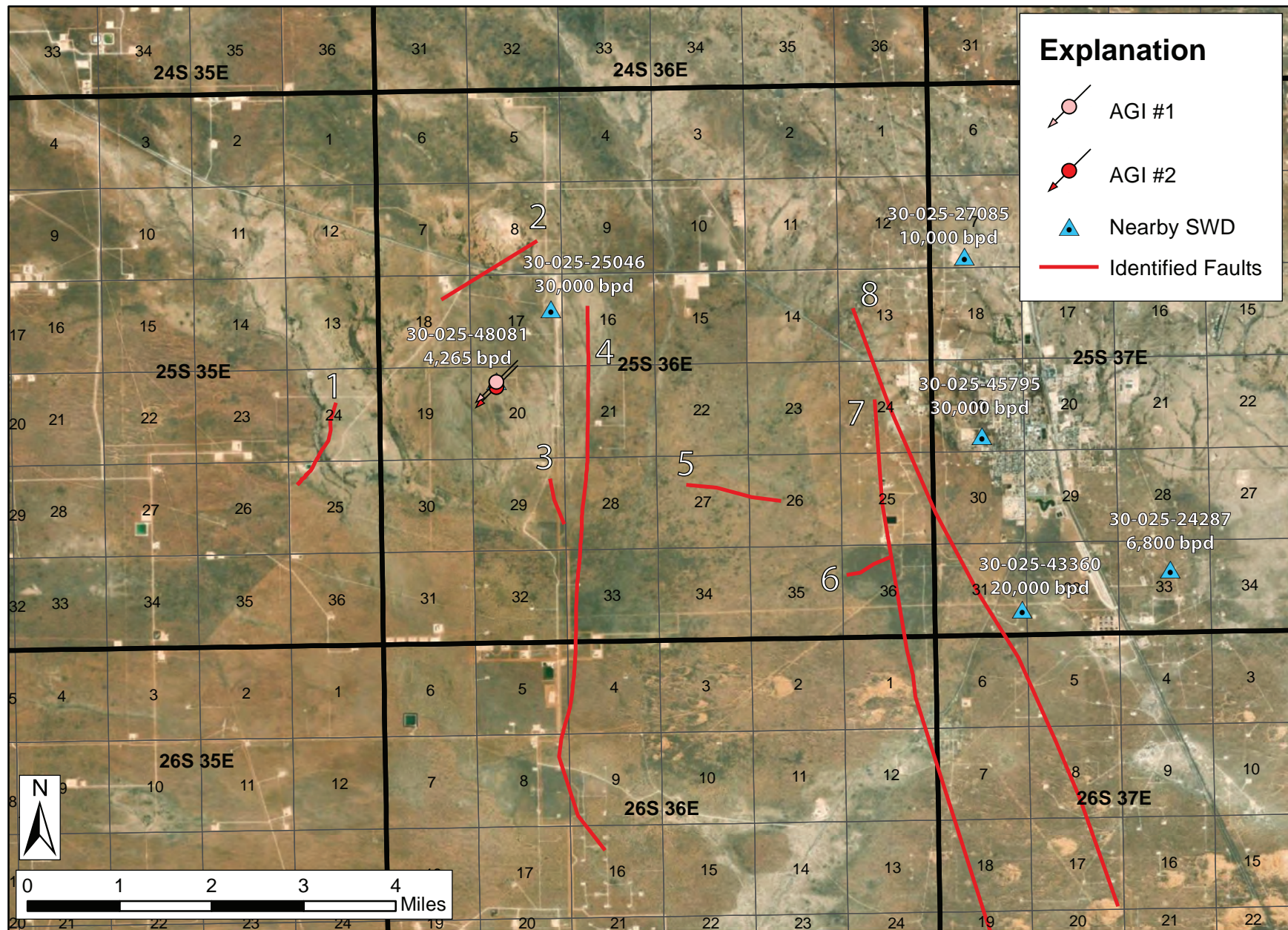
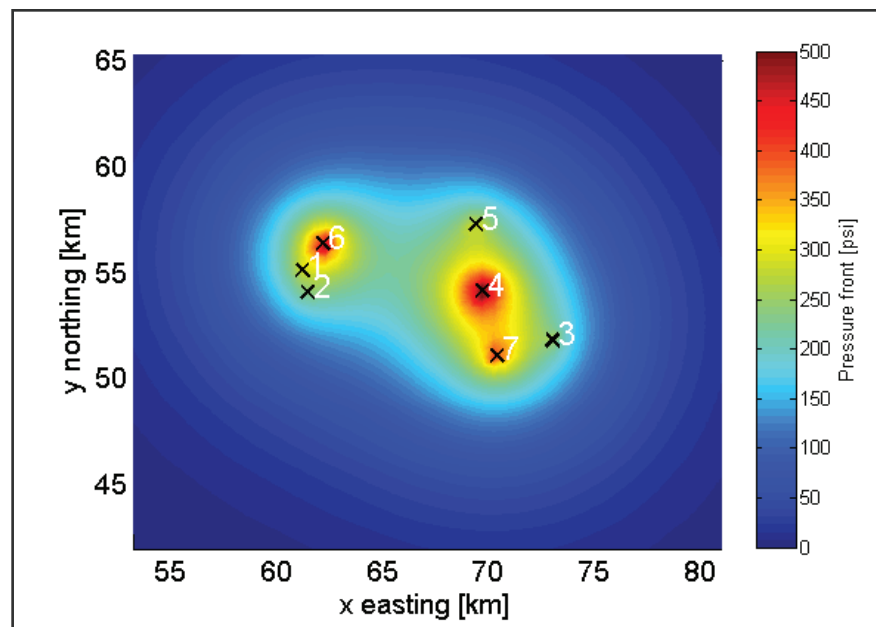
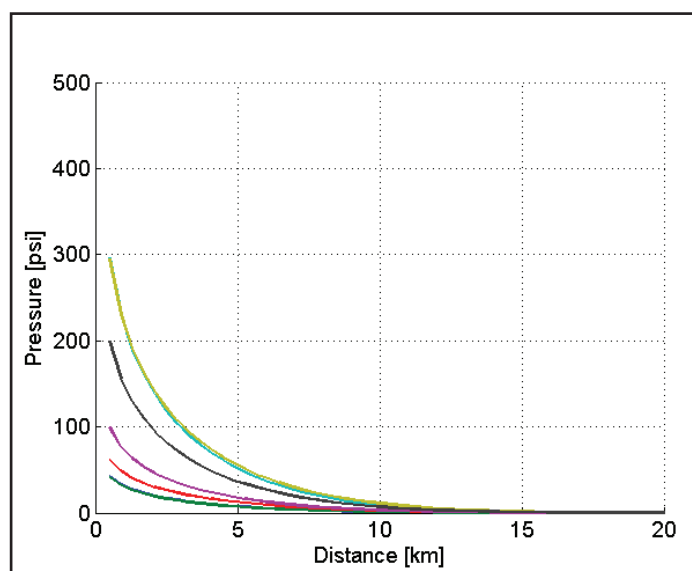


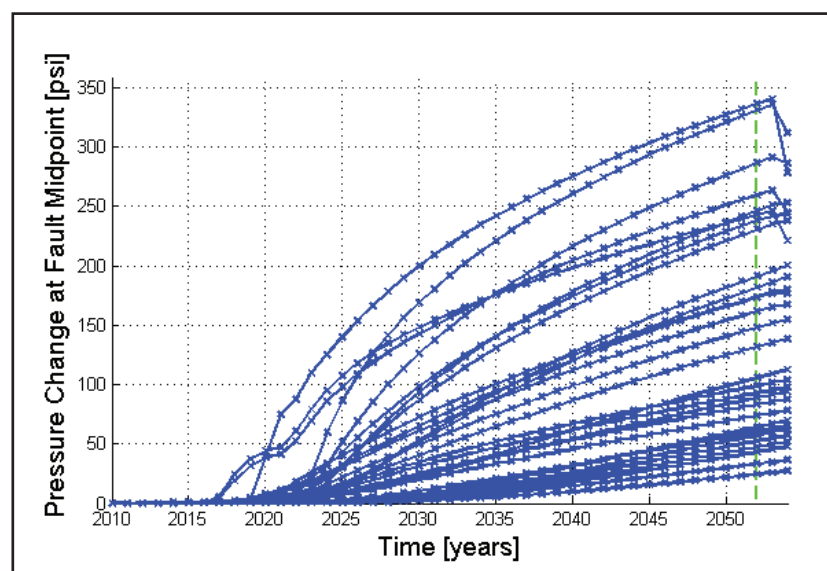
Figure 18. Siluro-Devonian injection wells and subsurface features in the vicinity of the proposed Independence AGI #2



Panel A. Resultant pressure front after 30 years of injection operations at the maximum anticipated injection rates, as reported in MNOCD records

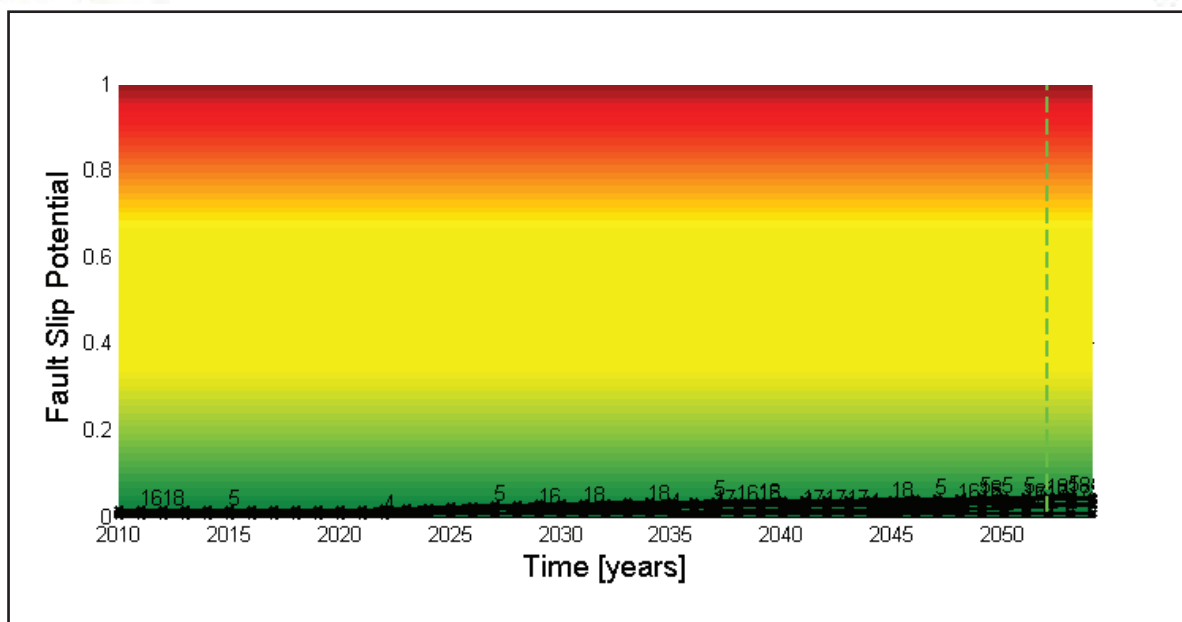


Panel B. Single well radial pressure solutions, as determined by the FSP model

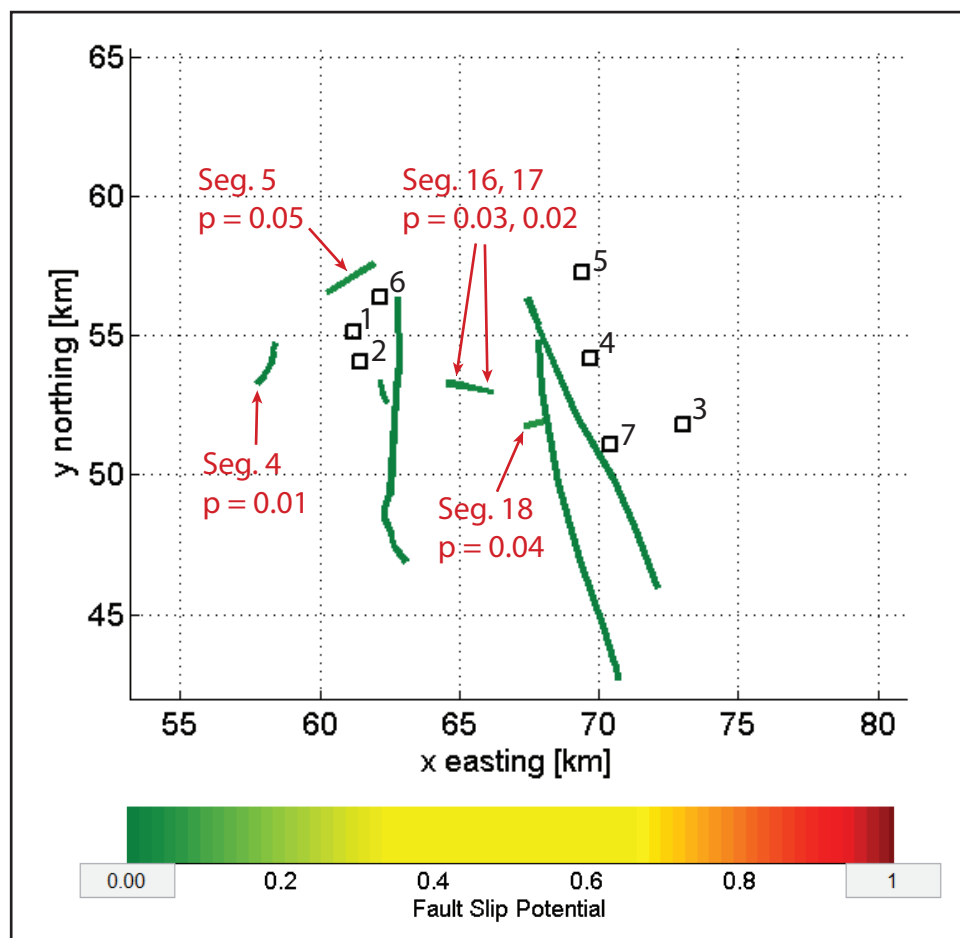


Panel C. Model-predicted pressure change through time at the midpoint of each fault segment included in the simulation

Figure 19. Summary of model-predicted pressure effects in response to the simulated seven-well injection scenario.



Panel A. Fault-slip probability throughout the entire simulated injection period. FSP model results suggest no significant risk of injection-induced slip along any feature included in the simulation.



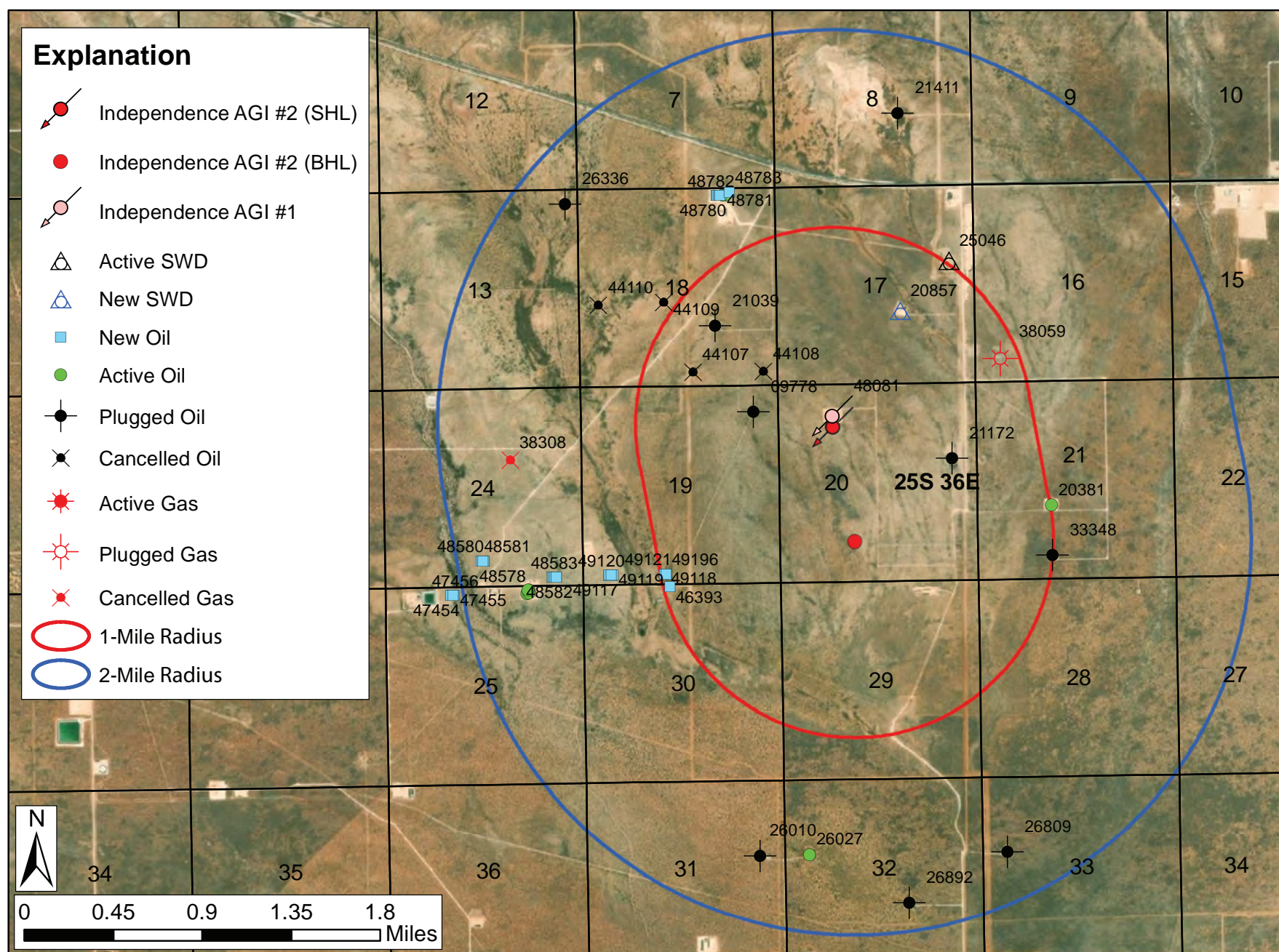
Panel B. Map view illustrating the model-estimated slip potential of faults at the end fo the 42-year injection scenario. Any feature estimated to have a non-zero slip potential determination is labeled on the above map.

Figure 20. Summary of model-determined fault-slip probabilities over the simulated injection period (2010-2052)

APPENDIX A

INFORMATION ON OIL AND GAS WELLS WITHIN TWO MILES AND ONE MILE OF THE PROPOSED INDEPENDENCE AGI #2 AND PLUGGING DATA FOR PLUGGED WELLS WITHIN ONE MILE OF THE PROPOSED AGI

Figure A-1:	All wells located within two miles of the proposed Independence AGI #2
Figure A-2:	All wells located within one mile of the proposed Independence AGI #2
Table A-1:	Wells located within two miles of the proposed Independence AGI #2
Table A-2:	Wells located within one mile of the proposed Independence AGI #2
Attachment A-1:	Available NMOCD plugging documents for the West Jal Unit #1 (API # 30-025-21172)



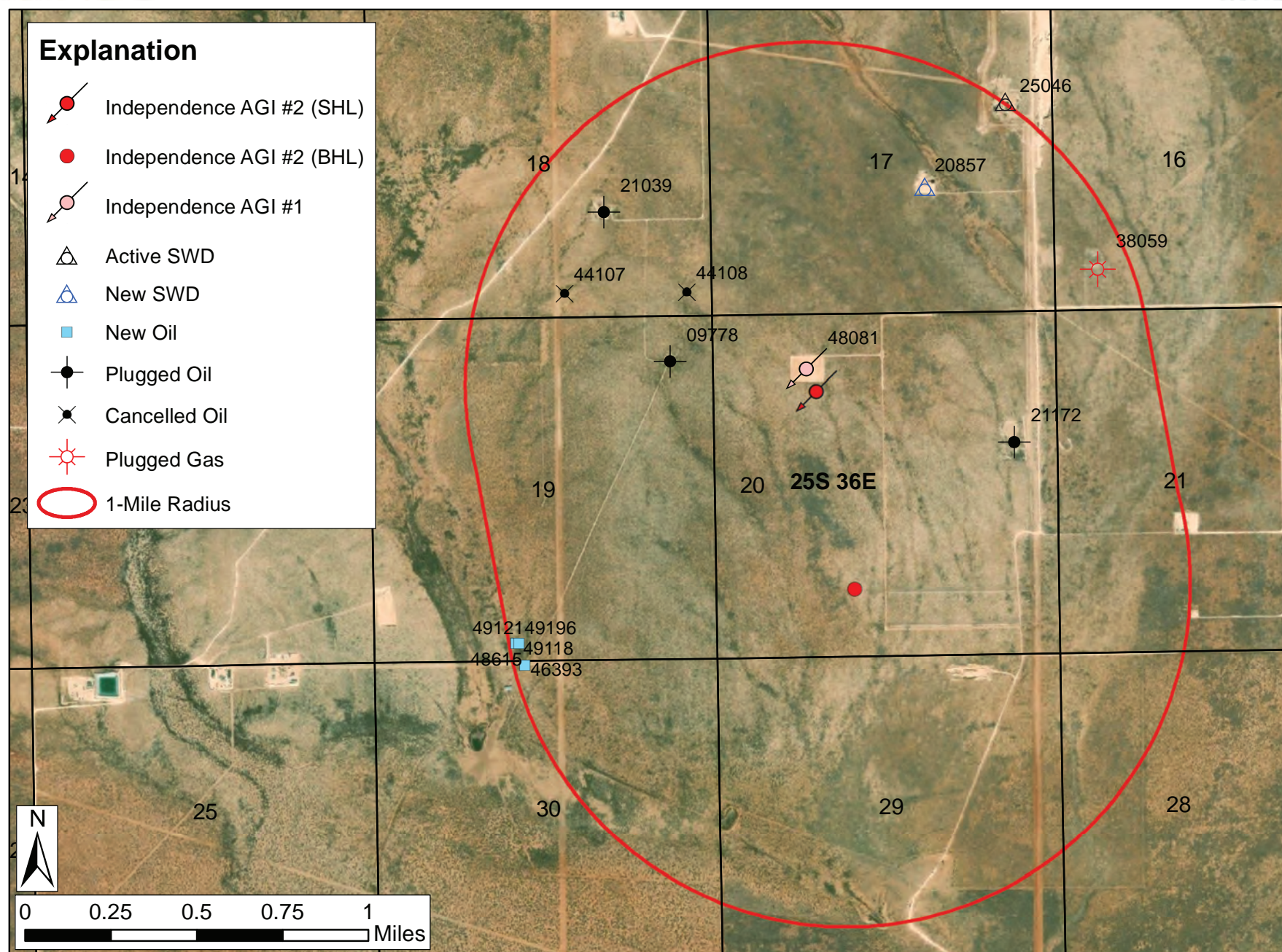


Figure A-2. All wells within one mile of the proposed Independence AGI #2. Labels denote las five digits of API #30-025-XXXXX.

TABLE A-1. WELLS LOCATED WITHIN TWO MILES OF THE PROPOSED INDEPENDENCE AGI #2

API	Well Name	Operator	Type	Status	LAT (NAD83)	LONG (NAD83)	Associated Pool	SPUD Year	Plug Date	TVD
30-025-21172	West Jal Unit #1	Texaco Exploration & Prod.	Oil	Plugged	32.1176	-103.28074	Delaware, Strawn	-	1984	17086
30-025-38059	Dinwiddie St. COM #1	COG Operating	Gas	Plugged	32.12485	-103.27646	Strawn	2006	2008	12192
30-025-20381	Herkimer BQF FED #001H	Ameredev Operating	Oil	Active	32.11399	-103.27222	Delaware	1963	-	8515
30-025-33348	Texaco West Jal 21 #1	Enserch Exploration	Oil	Plugged	32.11036	-103.27222	-	1996	1996	7700
30-025-21039	West Jal 18 #1	Skelly Oil Co.	Oil	Plugged	32.12760	-103.30099	Wildcat	1964	1964	12950
30-025-09778	Federal #1	Edward C. Donahue	Oil	Plugged	32.12124	-103.29781	Wildcat	1959	1959	3891
30-025-26010	Spotted Tail Fed. #1	Gifford, Mitchell & Wisenbaker	Oil	Plugged	32.08862	-103.29784	Tansill, Yates, 7Riv	1978	1981	3336
30-025-26027	Sitting Bull A #1	Fulfer Oil & Cattle	Oil	Active	32.08862	-103.29358	Tansill, Yates, 7Riv	1978	-	3368
30-025-26892	Sitting Bull #2	Gifford, Mitchell & Wisenbaker	Oil	Plugged	32.08501	-103.28504	Sioux Yates	1980	1981	3746
30-025-21411	C Elliot FED #1	Texaco Exploration & Prod.	Oil	Plugged	32.14298	-103.28496	Strawn	-	1993	12276
30-025-25046	West Jal B Deep #1	BC&D Operating	SWD	Active	32.13209	-103.28071	Miss. – Fusselman	1975	-	18945
30-025-20857	West Jal B #1	BC&D Operating	SWD	New	32.12848	-103.28498	Delaware	1964	-	12275
30-025-26809	Little Hawk Federal #	Gifford, Mitchell, & Wisenbaker	Oil	Plugged	32.08861	-103.27651	Sioux Yates	1980	1981	3690
30-025-26336	Federal 13 A #1	Getty Oil Co.	Oil	Plugged	32.1367	-103.31378	Wildcat	1979	1979	3686
30-025-46393	Nandina 25 36 31 FED COM #124H	Ameredev Operating	Oil	New	32.10848	-103.30525	Wolfcamp	-	-	TBD
30-025-46561	Sioux 25 36 St FED COM #010H	Caza Operating	Oil	Active	32.10808	-103.31756	Wolfcamp	2020	-	12107
30-025-46554	Sioux 25 36 St FED COM #013H	Caza Operating	Oil	Active	32.10825	-103.3174	Wolfcamp	2020	-	11725
30-025-46553	Sioux 25 36 St FED COM #012H	Caza Operating	Oil	Active	32.10836	-103.3174	Wolfcamp	2020	-	11994
30-025-46533	Sioux 25 36 St FED COM #008H	Caza Operating	Oil	Active	32.10819	-103.3174	Wolfcamp	2019	-	12149
30-025-46551	Sioux 25 36 St FED COM #009H	Caza Operating	Oil	Active	32.10836	-103.31748	Bone Springs	2020	-	11894
30-025-46976	Black Marlin FED COM #204H	Tap Rock Operating	Oil	Active	32.13713	-103.30015	Wolfcamp	2020	-	11640
30-025-46977	Black Marlin FED COM #214H	Tap Rock Operating	Oil	Active	32.13712	-103.29999	Wolfcamp	2020	-	11741
30-025-47332	Sioux 25 36 St FED COM #002H	Caza Operating	Oil	New	32.10807	-103.324	Wolfcamp	-	-	TBD
30-025-47333	Sioux 25 36 St FED COM #003H	Caza Operating	Oil	New	32.10807	-103.32406	Wolfcamp	-	-	TBD
30-025-47454	Sioux 25 36 St FED COM #004H	Caza Operating	Oil	New	32.10807	-103.32413	Wolfcamp	-	-	TBD
30-025-47455	Sioux 25 36 St FED COM #007H	Caza Operating	Oil	New	32.10807	-103.32387	Bone Springs	-	-	TBD

30-025-47456	Sioux 25 Fed #006H	CAZA OPER., LLC	Oil	New	32.10807	-103.32394	UPR WOLFCAMP	-	-	TBD
30-025-48081	Independence AGI #1	Pinon Midstream LLC	AGI	New	32.12084	-103.29103	Devonian-Fusselman	2020	-	17750
30-025-48577	Santa Fe Fed Com #603H	Franklin Mountain Energy LLC	Oil	New	32.1093	-103.31536	Bone Spring	-	-	TBD
30-025-48578	Santa Fe Fed Com #704H	Franklin Mountain Energy LLC	Oil	New	32.11057	-103.32121	Wolfcamp	-	-	TBD
30-025-48579	Santa Fe Fed Com #705H	Franklin Mountain Energy LLC	Oil	New	32.1093	-103.31524	Wolfcamp	-	-	TBD
30-025-48580	Trinity Fed #602H	Franklin Mountain Energy LLC	Oil	New	32.11057	-103.32144	Bone Spring	-	-	TBD
30-025-48581	Trinity Fed #703H	Franklin Mountain Energy LLC	Oil	New	32.11057	-103.32132	Wolfcamp	-	-	TBD
30-025-48582	Zia Fed Com #604H	Franklin Mountain Energy LLC	Oil	New	32.1093	-103.31513	Bone Spring	-	-	TBD
30-025-48583	Zia Fed Com #706H	Franklin Mountain Energy LLC	Oil	New	32.1093	-103.31502	Wolfcamp	-	-	TBD
30-025-48614	Blue Marlin St #211H	TAP ROCK OPER., LLC	Oil	New	32.10931	-103.31019	Wolfcamp	-	-	TBD
30-025-48615	Blue Marlin St #212H	TAP ROCK OPER., LLC	Oil	New	32.1094	-103.30559	Wolfcamp	-	-	TBD
30-025-48778	Black Marlin Fed Com #113H	TAP ROCK OPER., LLC	Oil	New	32.13713	-103.30072	Bone Spring	-	-	TBD
30-025-48779	Black Marlin Fed Com #114H	TAP ROCK OPER., LLC	Oil	New	32.13713	-103.30064	Bone Spring	-	-	TBD
30-025-48780	Black Marlin Fed Com #203H	TAP ROCK OPER., LLC	Oil	New	32.13713	-103.30048	Wolfcamp	-	-	TBD
30-025-48781	Black Marlin Fed Com #206H	TAP ROCK OPER., LLC	Oil	New	32.13712	-103.30031	Wolfcamp	-	-	TBD
30-025-48782	Black Marlin Fed Com #213H	TAP ROCK OPER., LLC	Oil	New	32.13713	-103.3004	Wolfcamp	-	-	TBD
30-025-48783	Black Marlin Fed Com #216H	TAP ROCK OPER., LLC	Oil	New	32.13736	-103.2996	Wolfcamp	-	-	TBD
30-025-49115	Blue Marlin Fed Com #111H	TAP ROCK OPER., LLC	Oil	New	32.10932	-103.31048	Bone Spring	-	-	TBD
30-025-49116	Blue Marlin Fed Com #112H	TAP ROCK OPER., LLC	Oil	New	32.10939	-103.31048	Bone Spring	-	-	TBD
30-025-49117	Blue Marlin Fed Com #201H	TAP ROCK OPER., LLC	Oil	New	32.10938	-103.31022	Wolfcamp	-	-	TBD
30-025-49118	Blue Marlin Fed Com #202H	TAP ROCK OPER., LLC	Oil	New	32.1094	-103.30562	Wolfcamp	-	-	TBD
30-025-49119	Blue Marlin Fed Com #205H	TAP ROCK OPER., LLC	Oil	New	32.10938	-103.31014	Wolfcamp	-	-	TBD
30-025-49120	Blue Marlin Fed Com #211H	TAP ROCK OPER., LLC	Oil	New	32.10938	-103.3103	Wolfcamp	-	-	TBD
30-025-49121	Blue Marlin Fed Com #215H	TAP ROCK OPER., LLC	Oil	New	32.1094	-103.3057	Wolfcamp	-	-	TBD
30-025-49196	Blue Marlin Fed Com #212H	TAP ROCK OPER., LLC	Oil	New	32.1094	-103.30554	Wolfcamp	-	-	TBD

TABLE A-2. WELLS LOCATED WITHIN ONE MILE OF THE PROPOSED INDEPENDENCE AGI #2

API	Well Name	Operator	Type	Status	LAT (NAD83)	LONG (NAD83)	Associated Pools	SPUD Year	Plug Year	Vertical Depth
30-025-21172	West Jal Unit #001	Texaco Exploration & Prod.	Oil	Plugged	32.1176	-103.28074	Strawn	no data	1984	TBD
30-025-38059	Dinwiddie State Com #001	COG Operating	Gas	Plugged	32.12485	-103.27646	Strawn	2006	2008	12192
30-025-21039	West Jal 18 #1	Skelly Oil Co.	Oil	Plugged	32.12760	-103.30099	Wildcat	1964	1964	12950
30-025-09778	Federal #1	Edward C. Donahue	Oil	Plugged	32.12124	-103.29781	Wildcat	1959	1959	3891
30-025-20857	West Jal B #001	BC&D Operating	SWD	New	32.12848	-103.28498	Delaware	1964	no data	12275
30-025-46393	Nandina 25 36 31 Federal Com #124H	Ameredev Operating	Oil	New	32.10848	-103.30525	Wolfcamp	-	-	TBD
30-025-48081	Independence AGI #1	Pinon Midstream, LLC	AGI	New	32.12084	-103.29103	Devonian-Fusselman	2020	-	17750
30-025-48615	Blue Marlin State #212H	Tap Rock Operating	Oil	New	32.1094	-103.30559	Wolfcamp	-	-	TBD
30-025-49118	Blue Marlin Federal Com #202H	Tap Rock Operating	Oil	New	32.1094	-103.30562	Wolfcamp	-	-	TBD
30-025-49121	Blue Marlin Federal Com #215H	Tap Rock Operating	Oil	New	32.1094	-103.3057	Wolfcamp	-	-	TBD
30-025-49196	Blue Marlin Federal Com #212H	Tap Rock Operating	Oil	New	32.1094	-103.30554	Wolfcamp	-	-	TBD
30-025-25046	West Jal B Deep #1	BC&D Operating	SWD	Active	32.13209	-103.28071	Miss. – Fusselman	1975	-	18945

WEST JAL UNIT #1 (API 30-025-21172)

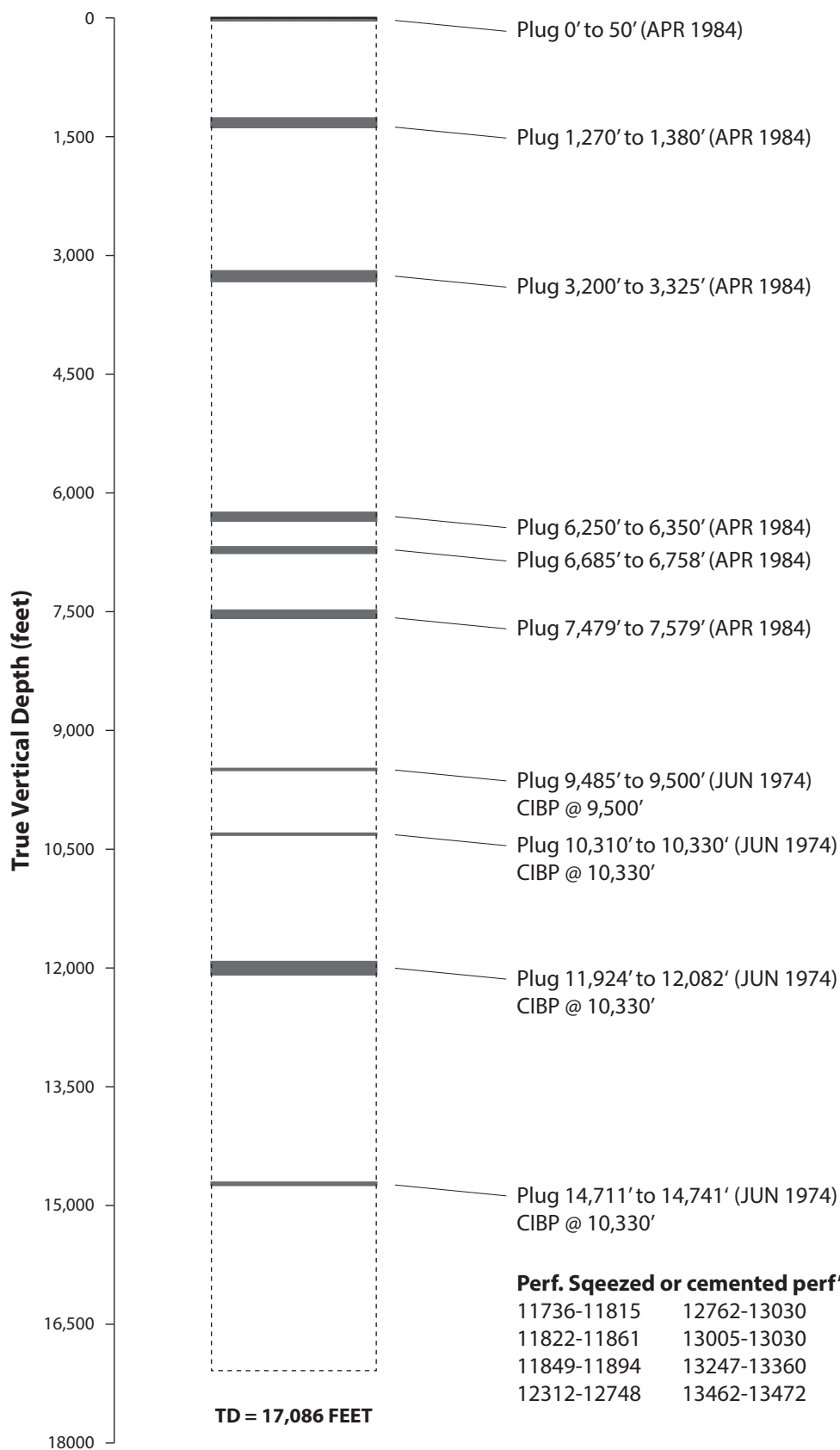
RELEVANT PLUGGING DOCUMENTS (Retrieved from NMOCD records)

NOTE: Plugging diagram generated from description of plugging operations reported in available NMOCD records

TEXACO EXPLORATION AND PROD. - WEST JAL UNIT #1 PLUGGING DIAGRAM

Lease Name: West Jal Unit #1
API: 30-025-21172
Location: Sec. 20, T25S, R36E
County, State: Lea County, New Mexico

Footage: 1980 FNL and 660 FEL
Well Type: Oil
Total Depth: 17,086'
Coordinates: 32.117596, -103.280739 (NAD83)



*Schematic is properly scaled

P. O. BOX 1980
HOBBS, NEW MEXICO 88240

Form 3160-5
(June 1990)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

SUNDRY NOTICES AND REPORTS ON WELLS

Do not use this form for proposals to drill or to deepen or reentry to a different reservoir.
Use "APPLICATION FOR PERMIT—" for such proposals.

SUBMIT IN TRIPLICATE

1. Type of Well

☒ Oil Well

☐ Gas Well

☒ Other

Reentry

2. Name of Operator

MCH Petroleum Services

3. Address and Telephone No.

708 W. Pine St. Midland, TX 79705 915 683 4772

4. Location of Well (Footage, Sec., T., R., M., or Survey Description)

1980' FNL 660' FEL Sec 20, T-25S, R-36E

H SENE Lea Co., NM

FORM APPROVED

Budget Bureau No. 1004-0135

Expires: March 31, 1993

5. Lease Designation and Serial No.

NM 71792

6. If Indian, Allottee or Tribe Name

7. If Unit or CA, Agreement Designation

8. Well Name and No.

West Jal Federal #1

9. API Well No.

30-025-21172

10. Field and Pool, or Exploratory Area

West Jal DeLeon

11. County or Parish, State

Lea, NM

12. CHECK APPROPRIATE BOX(s) TO INDICATE NATURE OF NOTICE, REPORT, OR OTHER DATA

TYPE OF SUBMISSION

☒ Notice of Intent

☐ Subsequent Report

☐ Final Abandonment Notice

TYPE OF ACTION

☐ Abandonment

☒ Recompletion

☐ Plugging Back

☐ Casing Repair

☐ Altering Casing

☒ Other Reentry

☐ Change of Plans

☐ New Construction

☐ Non-Routine Fracturing

☐ Water Shut-Off

☐ Conversion to Injection

☐ Dispose Water

(Note: Report results of multiple completion on Well Completion or Recompletion Report and Log form.)

13. Describe Proposed or Completed Operations (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work. If well is directionally drilled, give subsurface locations and measured and true vertical depths for all markers and zones pertinent to this work.)*

MCH Petroleum Services proposes to reenter existing well originally drilled by Skelly Oil Company in 1961 and plug and abandoned by Texaco in 1983. MCH will drill out cement plugs and cibp @ 7,579' to a total depth of approx. 8,350' (inside casing). This will leave in place cibp at 9,500' and deeper. We will then test existing perforations @ 7,807'-7,857' and stimulate as necessary.

Mud Program: Fresh water will be used for the reentry inside casing.

BOP Program: BOP will be installed at the beginning and tested daily.

APPROVAL SUBJECT TO
GENERAL REQUIREMENTS AND
SPECIAL STIPULATIONS
ATTACHED

14. I hereby certify that the foregoing is true and correct

Signed

Craig Huber

Title

Owner

Date

4/13/93

(This space for Federal or State office use)

APPROVED BY: RICHARD L. MANUS

Title

AREA MANAGER

Date

JUN 4 1993

Conditions of approval, if any:

Title 18 U.S.C. Section 1001, makes it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction.

*See Instruction on Reverse Side

Form 3160-3
(December 1990)SUBMIT IN TRIE TE*
(Other instructions on
reverse side)Form approved.
Budget Bureau No. 1004-0136
Expires: December 31, 1991UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

APPLICATION FOR PERMIT TO DRILL OR DEEPEN

1a. TYPE OF WORK

DRILL ☐DEEPEN ☐

b. TYPE OF WELL

OIL
WELL ☒GAS
WELL ☐OTHER ☒

Reentry

SINGLE
ZONE ☒MULTIPLE
ZONE ☐

2. NAME OF OPERATOR

MCH Petroleum Services

3. ADDRESS AND TELEPHONE NO.

708 W. Pine St. Midland, TX 79705 915 683 4772

4. LOCATION OF WELL (Report location clearly and in accordance with any State requirements.)*

At surface

1980' FNL, 660' FEL sec 20 T-25S, R-36E
LEA Co. NM

At proposed prod. zone

Same

H

SE NE

S-20, T-25S, R-36E

14. DISTANCE IN MILES AND DIRECTION FROM NEAREST TOWN OR POST OFFICE*

6 miles W. JAL, N.M.

15. DISTANCE FROM PROPOSED*

LOCATION TO NEAREST
PROPERTY OR LEASE LINE, FT.
(Also to nearest drlg. unit line, if any)

660'

18. DISTANCE FROM PROPOSED LOCATION*

TO NEAREST WELL, DRILLING, COMPLETED,
OR APPLIED FOR, ON THIS LEASE, FT.

16. NO. OF ACRES IN LEASE

600

19. PROPOSED DEPTH

8350

17. NO. OF ACRES ASSIGNED
TO THIS WELL

40

20. ROTARY OR CABLE TOOLS

Pulling unit/Reverse unit

21. ELEVATIONS (Show whether DF, RT, GR, etc.)

3076' GL

22. APPROX. DATE WORK WILL START

ASAP (Prior to 6/1/93 exp.)

23. PROPOSED CASING AND CEMENTING PROGRAM

SIZE OF HOLE	GRADE SIZE OF CASING	WEIGHT PER FOOT	SETTING DEPTH	QUANTITY OF CEMENT
26	20		869' (In Place)	1630 SK.
17 1/2	13 3/8	72, 68, 64	6300' (In Place)	3606 SK.
12 1/4	9 5/8	53.5, 47, 43.5	11,736 (In Place)	775 SK.
8 3/8	7	26	6735-12213	612 SK.
6 1/4	5 1/2 (LNR.)	(unk.)	(Shot off @ 6735)	
			12,032-15,400	450 SK.
(unk.)	3 1/2 (LNR.)	(unk.)	14,967-17,084	250 SK.

MCH Petroleum Services proposes to reenter existing well originally drilled by Skelly Oil Company in 1961 and plug and abandoned by Texaco in 1983. MCH will drill out cement plugs and cbbp @ 7,579' to a total depth of approx. 8,350' (inside casing). This will leave in place cbbp at 9,500' and deeper. We will then test existing perforations @ 7,807'-7,857' and stimulate as necessary.

Mud Program: Fresh water will be used for the reentry inside casing.

BOP Program: BOP will be installed at the beginning and tested daily.

IN ABOVE SPACE DESCRIBE PROPOSED PROGRAM: If proposal is to deepen, give data on present productive zone and proposed new productive zone. If proposal is to drill or deepen directionally, give pertinent data on subsurface locations and measured and true vertical depths. Give blowout preventer program, if any.

24.

SIGNED

Craig Huben

TITLE

Owner

DATE

4/13/93

(This space for Federal or State office use)

PERMIT NO.

APPROVAL DATE

Application approval does not warrant or certify that the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon.

CONDITIONS OF APPROVAL, IF ANY:

APPROVED BY

TITLE

DATE

*See Instructions On Reverse Side

Title 18 U.S.C. Section 1001, makes it a crime for any person knowingly and willfully to make to any department or agency of the

Released to Imaging 9/1/2022 4:45:41 PM

Form 3160-5
November 1983)
Formerly 9-331)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
HOBBS, NEW MEXICO 88240

Budget Bureau No. 1004-0135
Expires August 31, 1985

LEASE DESIGNATION AND SERIAL NO.

NM-03429A

OF INDIAN, ALLOTTEE OR TRIBE NAME

SUNDRY NOTICES AND REPORTS ON WELLS

(Do not use this form for proposals to drill or to deepen or plug back to a different reservoir.
Use "APPLICATION FOR PERMIT—" for such proposals.)

1. OIL WELL <input checked="" type="checkbox"/> GAS WELL <input type="checkbox"/> OTHER <input type="checkbox"/>		7. UNIT AGREEMENT NAME West Jal Unit	
2. NAME OF OPERATOR Getty Oil Company		8. FARM OR LEASE NAME	
3. ADDRESS OF OPERATOR P.O. Box 730, Hobbs, NM 88240		9. WELL NO. 1	
4. LOCATION OF WELL (Report location clearly and in accordance with any State requirements.* See also space 17 below.) At surface Unit Ltr. H, 1980' FNL & 660' FEL		10. FIELD AND POOL, OR WILDCAT West Jal Delaware	
14. PERMIT NO.		11. SEC., T., E., M., OR BLK. AND SURVEY OR AREA Sec. 20, T-25S, R-36E	
15. ELEVATIONS (Show whether Dr., RT, CR, etc.) 3138' D.F.		12. COUNTY OR PARISH Lea	
		13. STATE NM	

16. Check Appropriate Box To Indicate Nature of Notice, Report, or Other Data

NOTICE OF INTENTION TO:

TEST WATER SHUT-OFF ☐

FRACTURE TREAT ☐

SHOOT OR ACIDIZE ☐

REPAIR WELL ☐

(Other) ☐

PULL OR ALTER CASING ☐

MULTIPLE COMPLETE ☐

ABANDON* ☐

CHANGE PLANS ☐

SUBSEQUENT REPORT OF:

WATER SHUT-OFF ☐

FRACTURE TREATMENT ☐

SHOOTING OR ACIDIZING ☐

(Other) ☐

REPAIRING WELL ☐

ALTERING CASING ☐

ABANDONMENT* ☒

(Note: Report results of multiple completion on Well Completion or Recompletion Report and Log form.)

17. DESCRIBE PROPOSED OR COMPLETED OPERATIONS (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work. If well is directionally drilled, give subsurface locations and measured and true vertical depths for all markers and zones pertinent to this work.)*

3/26/84 Rigged up. Pulled rods and pump. Unseat tbq. anchor and install BOP.

3/28/84 Pulled 2 7/8" buttress & 2 3/8" tbq. anchor. Ran 7" CI plug, set @ 7579'. Ran 2 3/8" to 4290'. By Halliburton, circ. 191 bbls. gel brine, pulled tbq. Perfs 4-0.25" holes @ 6400'. Circ. out 7" between 9 5/8". Ran 2 7/8" to 7554'.

3/29/84 Rigged up csg. puller unit. Pulled tbq. Remove BOP & 7" tbq. spool.

3/30/84 Weld 7" pull nipple. Cut 7" csg. @ 6735'. Pulled 11 jts 7", 26#, P-110 csg. 8 rd.

3/31/84 Layed down total 163 jts (est. 6525') 7", 8rd casing. Nipple down 9 5/8" head.

4/2/84 Weld on 9 5/8" pulled nipple. Attempted to pull slips with 500,000#. Set off primer cord around head, no movement. Left soaking in penetrating oil.

4/3/84 Dug out 13 3/8" csg. unflange head. Move pipe 1" with 600,000#. Cut off. Pulled nipple, installed BOP. Ran tbq to 5216'.

4/4/84 Spot 20 sxs cement on top of CIBP 7579-7479'. Spot 100' plug (45 sxs) at 6758-6685', 6350-6250', 3325-3200', 1380-1270'. Remove csg. head.

4/5/84 Rigged down. Installed 20 sxs. Plugged 0-50'. Installed dry hole marker. P&A.

18. I hereby certify that the foregoing is true and correct

SIGNED Donald J. Steiner

TITLE Area Superintendent

DATE April 11, 1984

SIGNED Dale R. Crockett

(This space for Federal or State office use)

APPROVED BY Dale R. Crockett

TITLE Area Superintendent

DATE 6/8/87

CONDITIONS OF APPROVAL, IF ANY:

0+6-BLM-Roswell 1-Mr. J.A.-Midland
1-File 1-Laura Richardson-Midland
1-Engr Jim 1-BB, 1-JA *See Instructions on Reverse Side
1-Foreman CK 1-SH, 1-CP 1-Southland Royalty Company, 1-ARCO

Approved as to BLM-03429A-1-1 well core,
Liability under lease is retained until
surface restoration is completed.

Title 18 U.S.C. Section 1001, makes it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction.

N. M. OIL CONS. COMMISSION

P. O. BOX 1980

HOBBS, NEW MEXICO 88240

O+6 - BLM - P.O. Box 1857, Roswell, 1-File, 1-Engr. JIM, 1-Foreman CK

Form 9-331 1 - Laura Richardson-Midland
Dec. 1973Form Approved.
Budget Bureau No. 42-R1424UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

SUNDRY NOTICES AND REPORTS ON WELLS

(Do not use this form for proposals to drill or to deepen or plug back to a different reservoir. Use Form 9-331-C for such proposals.)

1. oil well ☒ gas well ☐ other ☐

DIST. 6 N. M.

2. NAME OF OPERATOR
Getty Oil Company3. ADDRESS OF OPERATOR
P.O. Box 730 Hobbs, NM 88240

4. LOCATION OF WELL (REPORT LOCATION CLEARLY. See space 17 below.)

AT SURFACE: Unit 1tr. H, 1980' FNL & 660 FEL
AT TOP PROD. INTERVAL:
AT TOTAL DEPTH:

16. CHECK APPROPRIATE BOX TO INDICATE NATURE OF NOTICE, REPORT, OR OTHER DATA

REQUEST FOR APPROVAL TO:

SUBSEQUENT REPORT OF:

TEST WATER SHUT-OFF ☐
FRACTURE TREAT ☐
SHOOT OR ACIDIZE ☐
REPAIR WELL ☐
PULL OR ALTER CASING ☐
MULTIPLE COMPLETE ☐
CHANGE ZONES ☐
ABANDON* ☒
(other) Revised ☐☐
☐
☐
☐
☐
☐
☐
☐5. LEASE
NM-03429A
6. IF INDIAN, ALLOTTEE OR TRIBE NAME
7. UNIT AGREEMENT NAME
8. FARM OR LEASE NAME
West Jal Unit
9. WELL NO.
1
10. FIELD OR WILDCAT NAME
West Jal Delaware
11. SEC., T., R., M., OR BLK. AND SURVEY OR AREA
Sec. 20, 25S-36E
12. COUNTY OR PARISH
Lea
13. STATE
NM
14. API NO.
15. ELEVATIONS (SHOW DF, KDB, AND WD)
3138' D.F.

(NOTE: Report results of multiple completion or zone change on Form 9-330.)

17. DESCRIBE PROPOSED OR COMPLETED OPERATIONS (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work. If well is directionally drilled, give subsurface locations and measured and true vertical depths for all markers and zones pertinent to this work.)*

Revised procedure as per conversation with Mr. Peter Chester 7/18/83:

1. Install B.O.P.
2. Set C.I.B.P. at +7860 w/35' cement on top.
3. Perforate 2 holes @ 6375' & squeeze with sufficient cement to bring cement to 6225'.
4. Set cement plug 1230-1330' top of salt. (in & behind casing).
5. Set 50' surface plug.
6. Install dry hole marker.
7. Restore location.

Subsurface Safety Valve: Manu. and Type

Set @ Ft.

18. I hereby certify that the foregoing is true and correct

SIGNED [Signature] Area Superintendent DATE July 22, 1983

APPROVED

(This space for Federal or State office use)

(Orig. Sgd.) W. CHESTER

APPROVED BY

TITLE

DATE

CONDITIONS OF APPROVAL IF ANY:

SEP 14 1983

July

Form 9-330
(Rev. 5-63)UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

SUBMIT IN DUPLICATE

(See other in-
structions on
reverse side)Form approved.
Budget Bureau No. 42-R355.5.

WELL COMPLETION OR RECOMPLETION REPORT AND LOG *

1a. TYPE OF WELL: OIL WELL <input checked="" type="checkbox"/> GAS WELL <input type="checkbox"/> DRY <input type="checkbox"/> Other _____		5. LEASE DESIGNATION AND SERIAL NO. NH-03429-A	
b. TYPE OF COMPLETION: NEW WELL <input type="checkbox"/> WORK OVER <input type="checkbox"/> DEEP-EN <input type="checkbox"/> PLUG BACK <input checked="" type="checkbox"/> DIFF. RESVR. <input checked="" type="checkbox"/> Other _____		6. IF INDIAN, ALLOTTEE OR TRIBE NAME -----	
2. NAME OF OPERATOR Shelly Oil Company		7. UNIT AGREEMENT NAME -----	
3. ADDRESS OF OPERATOR P. O. Box 1331, Midland, Texas 79301		8. FARM OR LEASE NAME West Jal Unit	
4. LOCATION OF WELL (Report location clearly and in accordance with any State requirements)* At surface Unit Letter H, 1880' FWL and 640' FWL, Sec. 20-258-36E At top prod. interval reported below At total depth		9. WELL NO. 1	
14. PERMIT NO. _____ DATE ISSUED _____		10. FIELD AND POOL, OR WILDCAT Jal Delaware, West	
11. SEC., T., R., M., OR BLOCK AND SURVEY OR AREA Sec. 20-258-36E		12. COUNTY OR PARISH Lea	
13. STATE New Mexico		18. ELEVATIONS (DF, RKB, RT, GR, ETC.)* 3138' DF	
15. DATE SPUDDED --	16. DATE T.D. REACHED --	17. DATE COMPL. (Ready to prod.) 3-26-74	19. ELEV. CASINGHEAD --
20. TOTAL DEPTH, MD & TVD 17086'	21. PLUG, BACK T.D., MD & TVD 9485' FBTD	22. IF MULTIPLE COMPL., HOW MANY* --	23. INTERVALS DRILLED BY --
24. PRODUCING INTERVAL(S), OF THIS COMPLETION—TOP, BOTTOM, NAME (MD AND TVD)* 7807-7857' Delaware			25. WAS DIRECTIONAL SURVEY MADE --
26. TYPE ELECTRIC AND OTHER LOGS RUN None			27. WAS WELL CORED --
28. CASING RECORD (Report all strings set in well)			
CASING SIZE No Change	WEIGHT, LB./FT.	DEPTH SET (MD)	HOLE SIZE
CEMENTING RECORD			
AMOUNT PULLED			
29. LINER RECORD			
SIZE	TOP (MD)	BOTTOM (MD)	PACKS CEMENT*
SCREEN (MD)			
30. TUBING RECORD			
SIZE	DEPTH SET (MD)		PACKER SET (MD)
2-3/8" OD	7941'		--
2-7/8" OD			--
31. PERFORATION RECORD (Interval, size and number) 7807-7811', 7816-7818', 7851-7857', total 31 shots, 0.50" diameter, two shots per foot.		32. ACID, SHOT, FRACTURE, CEMENT SQUEEZE, ETC.	
DEPTH INTERVAL (MD) 7807-7857'		AMOUNT AND KIND OF MATERIAL USED 750 gallons mud acid 5000 gallons 15% NH acid, 82 ball sealers, 9000# 20-40 sand, 9000 gallons lease oil	
33.* PRODUCTION			
DATE FIRST PRODUCTION 3-28-74	PRODUCTION METHOD (Flowing, gas lift, pumping—size and type of pump) Pumping		WELL STATUS (Producing or Producing) Producing
DATE OF TEST 6-19-74	HOURS TESTED 24	CHOKE SIZE *	PROD'N. FOR TEST PERIOD --
OIL—BBL. 63	GAS—MCF. 1	WATER—BBL. 6	GAS-OIL RATIO 16
FLOW. TUBING PRESS. --	CASING PRESSURE 636	CALCULATED 24-HOUR RATE --	OIL GRAVITY-API (CORR.) 41*
34. DISPOSITION OF GAS (Sold, used for fuel, vented, etc.) Used for Fuel			TEST WITNESSED BY
35. LIST OF ATTACHMENTS None			
36. I hereby certify that the foregoing and attached information is complete and correct as determined from all available records			
SIGNED (Signed) D. R. CROW		DATE 6-20-74	
D. R. CROW		TITLE Lead Clerk	

*(See Instructions and Spaces for Additional Data on Reverse Side)

INSTRUCTIONS

General: This form is designed for submitting a complete and correct well completion report and log on all types of lands and leases to either a Federal agency or a State agency, or both, pursuant to applicable Federal and/or State laws and regulations. Any necessary special instructions concerning the use of this form and the number of copies to be submitted, particularly with regard to local, area, or regional procedures and practices, either are shown below or will be issued by, or may be obtained from, the local Federal and/or State office. See instructions on items 22 and 24, and 33, below regarding separate reports for separate completions.

If not filed prior to the time this summary record is submitted, copies of all currently available logs (drillers, geologists, sample and core analysis, all types electric, etc.), formation and pressure tests, and directional surveys, should be attached hereto, to the extent required by applicable Federal and/or State laws and regulations. All attachments should be listed on this form, see item 35.

Item 4: If there are no applicable State requirements, locations on Federal or Indian land should be described in accordance with Federal requirements. Consult local State or Federal office for specific instructions.

Item 18: Indicate which elevation is used as reference (where not otherwise shown) for depth measurements given in other spaces on this form and in any attachments.

Items 22 and 24: If this well is completed for separate production from more than one interval zone (multiple completion), so state in item 22, and in item 24 show the producing interval, or intervals, top(s), bottom(s) and name(s) (if any) for only the interval reported in item 33. Submit a separate report (page) on this form, adequately identified, for each additional interval to be separately produced, showing the additional data pertinent to such interval.

Item 29: "Sacks Cement": Attached supplemental records for this well should show the details of any multiple stage cementing and the location of the cementing tool.

Item 33: Submit a separate completion report on this form for each interval to be separately produced. (See instruction for items 22 and 24 above.)

37. SUMMARY OF POROUS ZONES:

SHOW ALL IMPORTANT ZONES OF POROSITY AND CONTENTS THEREOF; CORED INTERVALS; AND ALL DRILL-STEM TESTS, INCLUDING DEPTH INTERVAL TESTED, CUSHION USED, TIME TOOL OPEN, FLOWING AND SHUT-IN PRESSURES, AND RECOVERIES

FORMATION	TOP	BOTTOM	DESCRIPTION, CONTENTS, ETC.	38. GEOLOGIC MARKERS		
				NAME	MEAS. DEPTH	TRUE VERT. DEPTH
1)			Squeezed Fusselman perfs. 16,449-16,614' with 100 sacks Class "H" cement, 5/10X CFR-2.			
2)			Spotted 25 sacks cement 14,711-14,741', 25 sacks 11,924-12,082' and set cast iron bridge plug at 10,330' and spotted 4 sacks cement 10,310-10,330'.			
3)			Perforated 7" OD casing in First Bone Springs formation with two 0.48 diameter holes per foot at 10,112-10,122' and 10,128-10,132'. (28 shots total)			
4)			Treated First Bone Springs perfs. 10,112-10,132' with 5500 gallons acid and 58 ball sealers.			
5)			Swab tested First Bone Springs perfs. 10,112-10,132' May 14, 1974, to May 21, 1974, for no oil, 14 bbls. water and slight show of gas in 5 hours.			
6)			Set cast iron bridge plug at 9500' and cemented with 3 sacks cement plugging back to 9485'.			
7)			Perforated 7" OD casing in Delaware formation with two 0.50" diameter holes per foot at 7807-7811', 7816-7824' and 7853-7857'. (32 shots total)			
8)			Treated Delaware perfs. 7807-7857' with 750 gallons mud acid, 5000 gallons 15% NE acid, 9000 gallons gelled lease oil, 9000# 20-40 sand and 22 ball sealers.			
9)			Returned well to production status 5-28-74 pumping Delaware perfs. 7807-7857' for 63 bbls. oil, 6 bbls. water and 1 MCFGPD.			

West Jal Unit
Well No. 1
Lea Co., New Mexico
Page 2

- 8) Flowed 24-1/2 hours through 1" choke, making no oil, 45 bbls. load water, 393 bbls. formation water and gas at rate of 266 MCF per day. FTP 200#, CP 2300#.
- 9) Ran flow meter, Gradionometer and Temperature Survey to determine water entry.
- 10) Shut well in seven hours, then ran Base Temperature Log 16,000-17,020'. Water channelling from bottom of well bore to 16,508'.
- 11) Set cement retainer at 16,250' and squeezed perfs. 16,499-16,614' with 150 sacks Class "H" cement containing 4/10ths of 1% CFR-2 and 1% Halad 9. Squeeze failed. WOC 4 hours.
- 12) Resqueezed perfs. 16,449-16,614' with 50 sacks Class "H" cement with 1% Halad 9, 4/10ths of 1% CFR-2 and 1/4# Flocele per sack and 150 sacks Class "H" containing 1% Halad 9 and 4/10ths of 1% CFR-2. Squeeze failed.
- 13) Attempted to pull cement retainer - stuck.
- 14) Milled and pushed cement retainer from 16,250' to 16,490'. Recovered cement retainer.
- 15) Drilled and pushed junk to 16,930'.
- 16) Ran 254 jts. (14,793') of 2-7/8" OD tubing and set packer at 14,810'. Swabbed 9 hours, recovering 60 bbls. load water with good show of gas.
- 17) Treated perfs. 16,449-16,614' with 500 gals. 15% NE acid with 2 ball sealers. Swabbed 7 hours, recovering 1 bbl. load water, flowing gas at rate of 50 MCF per day.
- 18) Treated perfs. 16,449-16,614' with 5000 gals. 15% NE acid and 27 ball sealers.
- 19) Ran Temperature Survey 15,000-16,958'.
- 20) Tested well. Well flowed at rate of 910 MCF per day on 23/64" choke, no oil, FTP 310#. Pulled tubing and packer.
- 21) Reran 457 jts. (14,940') of 2-7/8" OD 7.9# DSS-HT Atlas-Bradford Condition "A" tubing and set at 14,967'.
- 22) Circulated hole with corrosion inhibitor water. Released rig 11-8-72. Flowed and tested well.
- 23) On Dec. 11, 1972, treated perfs 16,449-16,614' with 12,500 gals. of 1% KCL water with 62# friction reducer, 25 gals. Adofoam and 25 gals. scale inhibitor, 20,000 gals. 20% retarded acid with 100# friction reducer, 40 gals. Adofoam, 160 gals. acid inhibitor, 1000# fluid loss agent and 40 gals. scale inhibitor and 7 ball sealers. All fluid contained 400 S.C.F Nitrogen per barrel.
- 24) Testing well.

Form 9-331
(May 1963)UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEYSUBMIT IN TRIPLI
(Other instructions
verse side)E*
re-Form approved.
Budget Bureau No. 42-R1424.

5. LEASE DESIGNATION AND SERIAL NO.

NM-03429-A

6. IF INDIAN, ALLOTTEE OR TRIBE NAME

7. UNIT AGREEMENT NAME

8. FARM OR LEASE NAME

West Jal Unit

9. WELL NO.

1

10. FIELD AND POOL, OR WILDCAT

Undesignated Fusselman

11. SEC., T., R., M., OR BLK. AND
SURVEY OR AREA

Sec. 20-25S-36E

12. COUNTY OR PARISH 13. STATE

Leon

New Mexico

SUNDRY NOTICES AND REPORTS ON WELLS

(Do not use this form for proposals to drill or to deepen or plug back to a different reservoir.
Use "APPLICATION FOR PERMIT—" for such proposals.)1. OIL ☐ GAS ☒ OTHER
WELL WELL

2. NAME OF OPERATOR

Skelly Oil Company

3. ADDRESS OF OPERATOR

P. O. Box 1351, Midland, Texas 79701

4. LOCATION OF WELL (Report location clearly and in accordance with any State requirements.*
See also space 17 below.)
At surface

1980' FWL and 660' FEL Sec. 20-25S-36E

14. PERMIT NO.

15. ELEVATIONS (Show whether DF, RT, GR, etc.)

3076' GR

16. Check Appropriate Box To Indicate Nature of Notice, Report, or Other Data

NOTICE OF INTENTION TO:

TEST WATER SHUT-OFF

FRACTURE TREAT

SHOOT OR ACIDIZE

REPAIR WELL

(Other)

PULL OR ALTER CASING

MULTIPLE COMPLETE

ABANDON*

CHANGE PLANS

SUBSEQUENT REPORT OF:

WATER SHUT-OFF

FRACTURE TREATMENT

SHOOTING OR ACIDIZING

(Other) Clean out & deepen to 17,086' x

(NOTE: Report results of multiple completion on Well
Completion or Recompletion Report and Log form.)17. DESCRIBE PROPOSED OR COMPLETED OPERATIONS (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any
proposed work. If well is directionally drilled, give subsurface locations and measured and true vertical depths for all markers and zones perti-
nent to this work.)*

- 1) Rigged up rotary tools 7-28-72. Pulled tubing and packer.
- 2) Set cement retainer at 11,390' and squeezed Strawn 7" OD casing perfs. 11,510-11,741' with 100 sacks Class "H" cement containing 1X CFR-2 and 3# sand per sack. Squeeze failed. WOC 4 hours.
- 3) Resqueezed perfs. 11,510-11,741' with 100 sacks Class "H" cement containing 5/10X of 1X CFR-2 and 3# sand per sack. Squeezed at 6500#. Reversed out 15 sacks.
- 4) After WOC 12 hours, drilled cement retainer at 11,390' and cement 11,390-11,755' with 6-1/2" bit.
- 5) Tested squeeze job to 3000#; held okay.
- 6) Drilled cement 11,790-11,832' and tested old squeeze job on perfs. 11,736-11,815' to 3000#; held okay.
- 7) Drilled cement 11,832-11,844'; pushed plus-plug to 11,976'. Drilled plug. Tagged junk at 12,002' and pushed to 12,312'.
- 8) Cleaned to top of 5-1/2" OD liner at 12,032', set cement retainer at 11,820' and found casing perfs. 11,849-11,894' open.
- 9) Squeezed 5-1/2" casing perfs. 11,849-11,894' with 50 sacks Class "H" with 1X CFR-2 and 100 sacks Class "H" with 1X CFR-2 and 3# sand per sack.
- 10) Dumped 20 sacks cement on retainer at 11,820', plugging back to 11,717'. Reversed out 90 sacks cement. WOC 12 hours.

(continued on page 2)

18. I hereby certify that the foregoing is true and correct

SIGNED

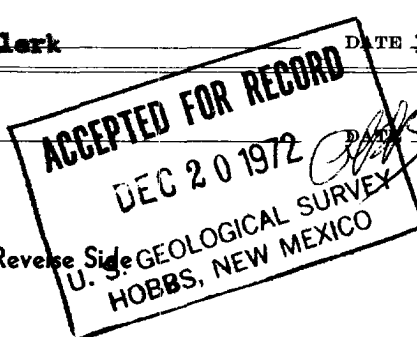
TITLE Lead Clerk

DATE Dec. 18, 1972

(This space for Federal or State office use)

APPROVED BY
CONDITIONS OF APPROVAL, IF ANY:

TITLE



*See Instructions on Reverse Side

West Jal Unit
Well No. 1
Lea Co., New Mexico
Page 2

- 11) Drilled cement 11,708-11,820'; cement retainer 11,820-11,822' and cement 11,822-11,861'. Cleaned out to top of liner at 12,032'.
- 12) Tested squeeze job to 2500#; held okay.
- 13) Drilled junk 12,312-12,748.5'; cement 12,748.5-12,760'; junk to 12,762'; cement 12,762-13,030'.
- 14) Tested old squeezed perfs. 13,005-13,030' to 2500#; held okay.
- 15) Milled and drilled cast iron bridge plug at 13,174' and pushed to 13,395'.
- 16) Tested 5-1/2" OD liner perfs. 13,247-13,360' to 2900#; could not pump into perfs.
- 17) Milled cast iron bridge plug 13,396-13,400'.
- 18) Tested perfs. 13,462-13,472' to 2700#; could not pump into perfs.
- 19) Milled and drilled out cement retainer 13,517-13,524'; cement 13,524-13,532'; cement 13,050-13,353'.
- 20) Milled and drilled cast iron bridge plug 15,340-15,858'. Washed over fish 15,858'; recovered fish. Cleaned out to old TD of 15,958'.
- 21) Drilled 4-3/4" new hole 15,958-16,498'.
- 22) Ran Drill Stem Test No. 1 (Silurian) 15,400-16,498'.
- 23) Drilled 4-3/4" hole 16,498' to total depth of 17,086' at 11 p.m. October 4, 1972.

Form 9-331
(May 1963)UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEYSUBMIT IN TRIPLICATE*
(Other instruction
verse side)Form approved.
Budget Bureau No. 42-R1424.

5. LEASE DESIGNATION AND SERIAL NO.

NM - 03429 - A

6. IF INDIAN, ALLOTTEE OR TRIBE NAME

- - -

7. UNIT AGREEMENT NAME

- - -

8. FARM OR LEASE NAME

West Jal Unit

9. WELL NO.

1

10. FIELD AND POOL, OR WILDCAT

Strawn Formation11. SEC., T., R., M., OR BLK. AND
SURVEY OR AREA**20-258-36E**

14. PERMIT NO.

15. ELEVATIONS (Show whether DF, RT, GR, etc.)

3102' DF

12. COUNTY OR PARISH

Lea

13. STATE

New Mexico

16. Check Appropriate Box To Indicate Nature of Notice, Report, or Other Data

NOTICE OF INTENTION TO :

TEST WATER SHUT-OFF

FRACTURE TREAT

SHOOT OR ACIDIZE

REPAIR WELL

(Other)

PULL OR ALTER CASING

MULTIPLE COMPLETE

ABANDON*

CHANGE PLANS

SUBSEQUENT REPORT OF :

WATER SHUT-OFF

FRACTURE TREATMENT

SHOOTING OR ACIDIZING

(Other) **Cement, perforate & treat**

REPAIRING WELL

ALTERING CASING

ABANDONMENT*

(NOTE: Report results of multiple completion on Well
Completion or Recompletion Report and Log form.)

17. DESCRIBE PROPOSED OR COMPLETED OPERATIONS (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work. If well is directionally drilled, give subsurface locations and measured and true vertical depths for all markers and zones pertinent to this work.)*

- 1) Perforated 2-7/8"OD tubing at 11,696', 11,297', 10,574'; 9698'; 8892'; 8707', 8403'. Circulated to remove mud from annulus. Work began 1-29-69.
- 2) Pulled tubing
- 3) Ran 2-7/8"OD tubing with "RTTS" Packer. Set packer at 11,848'.
- 4) Squeezed 7"OD casing perforations 11,736-11,894' with 150 sacks class "H" Cement with 1% CPR-2 per sack, maximum pressure 4600#, failed. W.O.C. 4 hours. Broke formation down with 5000#.
- 5) Squeezed 7"OD casing perforations 11,736-11,894" with 50 sacks Class "H" cement with 1% CPR-2 and 5# No. 3 sand per sack. Displaced 35 sacks into formation. Pulled tubing and packer.
- 6) WOC 36 hours. Ran tubing with 6-1/8" bit. Top of cement inside 7"OD casing at 11,595'. Washed and circulated cement to 11,620'. Drilled cement 11,620-11,700'. Drilled packer 11,700-705'. Drilled cement 11,705-755'.
- 7) Tested casing to 3000#, held okay.
- 8) Spotted 12 bbls. acid 11,755-11,443'.
- 9) Perforated 7"OD casing with 2 shots per foot as follows:

11,510 - 513'	3'	6 shots
11,517 - 527'	10'	20 shots
11,536 - 540'	4'	8 shots
11,550 - 556'	6'	12 shots
11,561 - 567'	6'	12 shots
11,575 - 579'	4'	8 shots
11,660 - 667'	7'	14 shots

18. I hereby certify that the foregoing is true and correct

SIGNED _____

TITLE **District Production Manager** DATE **3-10-69**

(This space for Federal or State office use)

APPROVED BY _____

CONDITIONS OF APPROVAL, IF ANY:

TITLE

(ORIGINAL
SIGNED)**V. H. Fletcher****APPROVED**

MAR 11 1969

J. L. GORDON
ACTING DISTRICT ENGINEER

*See Instructions on Reverse Side

Form 9-331
(May 1963)UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEYSUBMIT IN TRIPlicate
(Other instructions on
reverse side)Form approved.
Budget Bureau No. 42-R1424.

SUNDRY NOTICES AND REPORTS ON WELLS

(Do not use this form for proposals to drill or to deepen or plug back to a different reservoir.
Use "APPLICATION FOR PERMIT—" for such proposals.)

1. OIL WELL <input type="checkbox"/> GAS WELL <input checked="" type="checkbox"/> OTHER		5. LEASE DESIGNATION AND SERIAL NO. 73503 NM-03429-A
2. NAME OF OPERATOR Shelly Oil Company		6. IF INDIAN, ALLOTTEE OR TRIBE NAME
3. ADDRESS OF OPERATOR P. O. Box 730 - Hobbs, New Mexico 88240		7. UNIT AGREEMENT NAME
4. LOCATION OF WELL (Report location clearly and in accordance with any State requirements.* See also space 17 below.) At surface 1980 from North line and 660 from East line, Section 20		8. FARM OR LEASE NAME West Jal Unit
14. PERMIT NO. 20-258-36E		9. WELL NO. 1
15. ELEVATIONS (Show whether DF, RT, GR, etc.) 3092' DF		10. FIELD AND POOL, OR WILDCAT Strawn Formation
		11. SEC., T., R., M., OR BLK. AND SURVEY OR AREA 20-258-36E
		12. COUNTY OR PARISH Lea
		13. STATE New Mexico

16. Check Appropriate Box To Indicate Nature of Notice, Report, or Other Data

NOTICE OF INTENTION TO:

TEST WATER SHUT-OFF ☐FRACTURE TREAT ☐SHOOT OR ACIDIZE ☐REPAIR WELL ☐(Other) **Cement, Perforate & Treat**PULL OR ALTER CASING ☐MULTIPLE COMPLETE ☐ABANDON* ☐CHANGE PLANS ☐**X**

SUBSEQUENT REPORT OF:

WATER SHUT-OFF ☐FRACTURE TREATMENT ☐SHOOTING OR ACIDIZING ☐(Other) ☐REPAIRING WELL ☐ALTERING CASING ☐ABANDONMENT* ☐

(NOTE: Report results of multiple completion on Well Completion or Recompletion Report and Log form.)

17. DESCRIBE PROPOSED OR COMPLETED OPERATIONS (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work. If well is directionally drilled, give subsurface locations and measured and true vertical depths for all markers and zones pertinent to this work.)*

Squeeze present perforated interval 11,736-11,852', below packer set at 11,700', with 125 sacks cement. Drill out to 11,790'. Perforate 11,510-11,783' with 2 shots per foot. Treat perforations 11,510-11,783' with 300 gallons 15% acid with 3 stage treatment using Dowell J-182 as diverting agent. Inject 72 barrels distillate to remove diverting agent. Shut and test.

18. I hereby certify that the foregoing is true and correct

SIGNED **(Signed) C. R. DAVIS**TITLE **District Operations Manager** DATE **1/24/69**

(This space for Federal or State office use)

APPROVED BY
CONDITIONS OF APPROVAL, IF ANY:

TITLE

APPROVED

RT/jc

*See Instructions on Reverse Side

JAN 27 1969
J. L. GORDON
ACTING DISTRICT ENGINEER

Form 9-331
(May 1963)UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEYSUBMIT IN TRIPLICATE
(Other instructions on
reverse side)Form approved.
Budget Bureau No. 42-R1424.

SUNDRY NOTICES AND REPORTS ON WELLS

(Do not use this form for proposals to drill or to deepen or plug back to a different reservoir.
Use "APPLICATION FOR PERMIT" for such proposals.)

1. OIL WELL <input type="checkbox"/> GAS WELL <input checked="" type="checkbox"/> OTHER <input type="checkbox"/>		5. LEASE DESIGNATION AND SERIAL NO. MI - 03429-A	
2. NAME OF OPERATOR Skelly Oil Company		6. IF INDIAN, ALLOTTEE OR TRIBE NAME -	
3. ADDRESS OF OPERATOR P. O. Box 730 - Hobbs, New Mexico 88240		7. UNIT AGREEMENT NAME -	
4. LOCATION OF WELL (Report location clearly and in accordance with any State requirements.* See also space 17 below.) At surface 1960' from North line and 660' from East line		8. FARM OR LEASE NAME West Jal Unit	
14. PERMIT NO.		9. WELL NO. 1	
15. ELEVATIONS (Show whether DF, RT, GR, etc.) 3138'		10. FIELD AND POOL, OR WILDCAT Jal Strawn West	
16. Check Appropriate Box To Indicate Nature of Notice, Report, or Other Data		11. SEC., T., R., M., OR BLK. AND SURVEY OR AREA 20-258-36E	
		12. COUNTY OR PARISH Lea	
		13. STATE New Mexico	

NOTICE OF INTENTION TO:

TEST WATER SHUT-OFF <input type="checkbox"/>	PULL OR ALTER CASING <input type="checkbox"/>
FRACTURE TREAT <input type="checkbox"/>	MULTIPLE COMPLETE <input type="checkbox"/>
SHOOT OR ACIDIZE <input type="checkbox"/>	ABANDON* <input type="checkbox"/>
REPAIR WELL <input type="checkbox"/>	CHANGE PLANS <input type="checkbox"/>
(Other) <input type="checkbox"/>	

SUBSEQUENT REPORT OF:

WATER SHUT-OFF <input type="checkbox"/>	REPAIRING WELL <input type="checkbox"/>
FRACTURE TREATMENT <input type="checkbox"/>	ALTERING CASING <input type="checkbox"/>
SHOOTING OR ACIDIZING <input type="checkbox"/>	ABANDONMENT* <input type="checkbox"/>
(Other) Eliminate water production <input checked="" type="checkbox"/>	

(NOTE: Report results of multiple completion on Well Completion or Recompletion Report and Log form.)

17. DESCRIBE PROPOSED OR COMPLETED OPERATIONS (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work. If well is directionally drilled, give subsurface locations and measured and true vertical depths for all markers and zones pertinent to this work.)*

- (1) Moved in and rigged up workover rig 10-21-68
- (2) Set Schlumberger "plus" plug in 7"OD casing at 11,844'.
- (3) Dumped 5' cement on top of plug, filling from 11,844' to 11,839'.
- (4) Dumped 200 lbs. Hydromite on top of "plus" plug, filling back to 11,832'.
- (5) Swabbed well.
- (6) Apparent communications still exist between upper and lower perforations behind 7"OD casing. Objective to shut off lower perforations 11,860 - 11,894' and to decrease water production unsuccessful.
- (7) Well returned to producing status 10-27-68 flowing 150 MCF gas per day through 7"OD casing perforations 11,736 - 11,894'.

18. I hereby certify that the foregoing is true and correct

SIGNED

TITLE

District Production Manager

DATE

10-30-68

(This space for Federal or State office use)

APPROVED BY

TITLE

APPROVED

CONDITIONS OF APPROVAL, IF ANY:

NOV 1 1968

*See Instructions on Reverse Side

J L GORDON
ACTING DISTRICT ENGINEER

Form 9-331
(May 1963)UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEYSUBMIT IN TRIPLICATE
(Other instructions on
reverse side)Form approved.
Budget Bureau No. 42-R1424.

5. LEASE DESIGNATION AND SERIAL NO.

NH - 03429 - A

6. IF INDIAN, ALLOTTEE OR TRIBE NAME

7. UNIT AGREEMENT NAME

8. FARM OR LEASE NAME

West Jal Unit

9. WELL NO.

1

10. FIELD AND POOL, OR WILDCAT

Jal Strawn West11. SEC., T., R., M., OR BLK. AND
SURVEY OR AREA**Sec. 20-258-36E**

12. COUNTY OR PARISH

Lea

13. STATE

New Mexico

1.

OIL WELL ☐ GAS WELL ☒ OTHER ☐

2. NAME OF OPERATOR

SKELLY OIL COMPANY

3. ADDRESS OF OPERATOR

P. O. Box 730 - Hobbs, New Mexico 882404. LOCATION OF WELL (Report location clearly and in accordance with any State requirements.*
See also space 17 below.)

At surface

1980' FWL & 660' FWL Sec. 20-258-36E

14. PERMIT NO.

15. ELEVATIONS (Show whether DF, RT, GR, etc.)

3138' DF

16. Check Appropriate Box To Indicate Nature of Notice, Report, or Other Data

NOTICE OF INTENTION TO:

TEST WATER SHUT-OFF ☐FRACTURE TREAT ☐SHOOT OR ACIDIZE ☐REPAIR WELL ☐(Other) ☐PULL OR ALTER CASING ☐MULTIPLE COMPLETE ☐ABANDON* ☐CHANGE PLANS ☐

SUBSEQUENT REPORT OF:

WATER SHUT-OFF ☐FRACTURE TREATMENT ☐SHOOTING OR ACIDIZING ☐(Other) ☐REPAIRING WELL ☐ALTERING CASING ☐ABANDONMENT* ☐**Clear, Determine Water Source,
Eliminate Water Production** ☒
(NOTE: Report results of multiple completion on Well
Completion or Recompletion Report and Log form.)

17. DESCRIBE PROPOSED OR COMPLETED OPERATIONS (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work. If well is directionally drilled, give subsurface locations and measured and true vertical depths for all markers and zones pertinent to this work.)*

Moved in and rigged up Workover Rig. Killed well. Ran 1-5/8" drill pipe and fishing tools to top of fish at 9901', pushed to 9991', caught fish, circulated and pulled out of hole. Recovered 2 strings of fishing tools previously left in hole. Reran 1-5/8" drill pipe several times with fishing tools and recovered 1786' in several pieces of 5/16" wire line, and a chemical cutter.

Tagged bottom of 2-7/8"OD tubing at 11,715'. Knocked off one foot of tubing and a bull plug that had been previously cut off. Pushed and drove bull plug to 12,482'. Hit firm fill-up of formation cavings and left one-foot piece of 2-7/8"OD tubing and bull plug in hole at 12,482', leaving tubing open-ended at 11,715' with full 2-7/8" opening. Pulled drill pipe and fishing tools and installed Xmas tree. Ran Gradicomonometer, Continuous Flowmeter and Packer Flowmeter to determine water source. Surveys indicated water source being produced through casing perforations 11,883-11,894'.

Set packer at 11,883'. Returned to production status November 19, 1967, producing 38 bbls. oil, 800 bbls. water and 2,000 MCF gas per day from the Strawn Gas Pool through perforations 11736-11894' through 7"OD casing.

18. I hereby certify that the foregoing is true and correct

SIGNED **(ORIGINAL)** **V. E. Fletcher**
(SIGNED)TITLE **District Superintendent**DATE **April 25, 1968**

(This space for Federal or State office use)

APPROVED BY _____
CONDITIONS OF APPROVAL, IF ANY:

TITLE _____

APPROVED

DATE _____

APR 26 1968

*See Instructions on Reverse Side

J. L. GORDON
ACTING DISTRICT ENGINEER

(Rev. 5-53)

**UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY**

SUBMIT IN DUPLICATE*

(See other in
structions on
reverse side)Form approved.
Budget Bureau No. 42-R355.5.**WELL COMPLETION OR RECOMPLETION REPORT AND LOG ***

1a. TYPE OF WELL: OIL WELL <input type="checkbox"/> GAS WELL <input checked="" type="checkbox"/> DRY <input type="checkbox"/> Other _____				5. LEASE DESIGNATION AND SERIAL NO. NM-03429-A											
b. TYPE OF COMPLETION: NEW WELL <input type="checkbox"/> WORK OVER <input checked="" type="checkbox"/> DEEP-EN <input checked="" type="checkbox"/> PLUG BACK <input type="checkbox"/> DIFF. RESVR. <input checked="" type="checkbox"/> Other _____				6. IF INDIAN, ALLOTTEE OR TRIBE NAME _____											
2. NAME OF OPERATOR Skelly Oil Company				7. UNIT AGREEMENT NAME _____											
3. ADDRESS OF OPERATOR P. O. Box 1351, Midland, Texas 79701				8. FARM OR LEASE NAME West Jal Unit											
4. LOCATION OF WELL (Report location clearly and in accordance with any State requirements)* At surface 1980' FNL and 660' FEL Sec. 20-25S-36E At top prod. interval reported below At total depth				9. WELL NO. 1											
14. PERMIT NO. _____ DATE ISSUED _____				10. FIELD AND POOL, OR WILDCAT Undesignated Fusselman											
15. DATE WELL started 7-28-72				11. SEC., T., R., M., OR BLOCK AND SURVEY OR AREA Sec. 20-25S-36E											
16. DATE T.D. REACHED 11-1-72				12. COUNTY OR PARISH Lea											
17. DATE COMPL. (Ready to prod.) 10-4-72				13. STATE New Mexico											
18. ELEVATIONS (DF, RKB, RT, GR, ETC.) * 3076' GR				19. ELEV. CASINGHEAD _____											
20. TOTAL DEPTH, MD & TVD 17,086'		21. PLUG, BACK T.D., MD & TVD 17,320'		23. INTERVALS DRILLED BY ROTARY TOOLS 15,958-17,086'											
22. IF MULTIPLE COMPL., HOW MANY* _____				24. PRODUCING INTERVAL(S), OF THIS COMPLETION—TOP, BOTTOM, NAME (MD AND TVD)* 16,449-16,614' (Fusselman)											
25. WAS DIRECTIONAL SURVEY MADE No				26. TYPE ELECTRIC AND OTHER LOGS RUN BHC Sonic Gamma Ray with Caliper, Dual Laterolog, Continuous Dipmeter, Compensated Neutron & Formation Density											
27. WAS WELL CORED No				28. CASING RECORD (Report all strings set in well)											
CASING SIZE	WEIGHT, LB./FT.	DEPTH SET (MD)	HOLE SIZE	CEMENTING RECORD	AMOUNT PULLED										
20"	94#	869'	26"	1630 sacks	None										
13-3/8"	72.61 & 68#	6300'	17-1/2"	3206 sacks	None										
9-5/8"	53.5 & 47#	11,732'	12-1/4"	975 sacks	None										
29. LINER RECORD			30. TUBING RECORD												
SIZE	TOP (MD)	BOTTOM (MD)	SACKS CEMENT*	SCREEN (MD)	SIZE										
		(See attachment)			2-7/8"										
31. PERFORATION RECORD (Interval, size and number) 16,449-16,614' (Fourteen .33" holes over 165' interval)			32. ACID, SHOT, FRACTURE, CEMENT SQUEEZE, ETC. <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th>DEPTH INTERVAL (MD)</th> <th>AMOUNT AND KIND OF MATERIAL USED</th> </tr> <tr> <td>11,510-11,741'</td> <td>200 sacks Class "H" Cement</td> </tr> <tr> <td>11,849-11,894'</td> <td>150 sacks Class "H" Cement</td> </tr> <tr> <td>16,449-16,614'</td> <td>350 sacks Class "H" Cement</td> </tr> <tr> <td colspan="2">(See attachment)</td> </tr> </table>			DEPTH INTERVAL (MD)	AMOUNT AND KIND OF MATERIAL USED	11,510-11,741'	200 sacks Class "H" Cement	11,849-11,894'	150 sacks Class "H" Cement	16,449-16,614'	350 sacks Class "H" Cement	(See attachment)	
DEPTH INTERVAL (MD)	AMOUNT AND KIND OF MATERIAL USED														
11,510-11,741'	200 sacks Class "H" Cement														
11,849-11,894'	150 sacks Class "H" Cement														
16,449-16,614'	350 sacks Class "H" Cement														
(See attachment)															
33.* PRODUCTION															
DATE FIRST PRODUCTION 11-1-72		PRODUCTION METHOD (Flowing, gas lift, pumping—size and type of pump) Flowing		WELL STATUS (Producing or shut-in) Producing											
DATE OF TEST 11-14-72	HOURS TESTED 24	CHOKE SIZE 24/64"	PROD'N. FOR TEST PERIOD →	OIL—BBL. -0-	GAS—MCF. 5950										
WATER—BBL. 216	GAS-OIL RATIO ---														
FLOW, TUBING PRESS. 1900#	CASING PRESSURE ---	CALCULATED 24-HOUR RATE →	OIL—BBL. -0-	GAS—MCF. 5950	WATER—BBL. 216										
34. DISPOSITION OF GAS (Sold, used for fuel, vented, etc.) Sold				TEST WITNESSED BY _____											
35. LIST OF ATTACHMENTS 2 copies each: Borehole Compensated Sonic Log - Gamma Ray, Compensated Neutron-Formation Density, Dual Laterolog, Gammatron															
36. I hereby certify that the foregoing and attached information is complete and correct as determined from all available records															
SIGNED C.J. Love		TITLE Dist. Prod. Manager		DATE Dec. 20, 1972											

*(See Instructions and Spaces for Additional Data on Reverse Side)

WEST JAL UNIT

Sheet No. 2

WELL NO. 1

Set Baker Cast Iron Bridge Plug at 13,400'. Spotted 2 sacks cement on top of bridge plug from 13,400' to 13,386'. Perforated 5-1/2" OD liner with 4 holes at 13,210' and squeezed with 85 sacks of cement. Drilled out cement to 13,386'. Perforated 5-1/2" liner with 4 shots per foot as follows: 13,247-13,270', 13,272-13,275', 13,286-13,292', 13,298-13,320', 13,326-13,329', 13,343-13,345', 13,356-13,360' for a total of 63' and 252 holes. Treated through 5-1/2" OD casing liner perfs. 13,247-13,360' (intervals) with 2500 gallons Mud Acid. Tested well several hours with volume to small to measure. Treated through 5-1/2" OD casing liner perfs. 13,247-13,360' (intervals) with 2500 gallons Mud Acid. Tested well several hrs. with volume to small to measure. Treated through 5-1/2" OD casing liner perfs. 13,247-13,360' (intervals) with 10,000 gallons 15% Regular Acid. Tested well several hours with volume to small to measure. Set Baker Cast Iron Model "N" Bridge Plug at 13,180'. Dumped 2 sacks of cement on top of plug, which plug well back from 13,180' to 13,166'. Perforated 5-1/2" OD liner with 4 holes per foot from 13,005' to 13,030' for a total of 25' and 100 holes. Treated through 5-1/2" OD liner perfs. 13,005-13,030' with 5,000 gallons 15% Regular Acid. Tested well several hours with volume too small to measure. We temporarily abandoned the testing of the Morrow Zone at this time. Set Halliburton "DC" Cement Retainer at 12,790' and squeezed 85 sacks of cement into 5-1/2" OD liner perfs. 13,005-13,030'. Plugged back total depth 12,790'. Perforated 7" OD casing with 4 holes per foot as follows: 11,736-11,741', 11,781-11,787', 11,808-11,815', 11,849-11,852', 11,860-11,894' for a total of 55' and 220 holes. Set Baker Model "F" Production Packer at 11,700'. Ran 2-7/8" OD 6.40# Buttress thread N-80 tubing to 11,715' and seated in Baker Model "F" Production Packer at 11,700' with perfs. 11,711-11,715'. Otis landing nipple position No. 1 at 11,709'. Otis side door shift valve at 11,698'. Otis landing nipple position No. 2 at 10,700'. Otis landing nipple position No. 3 at 9700'. Opened well up and flowed to pit to clean up. Shut well in for 89 hours. After 89 hours with dead weight T.P. 6218# flowed and tested well in the following manner:

Flowed 1-3/4 hours on 10/64" choke, opening TP 6218# (DW), FTP 6156psi., gas volume 2,737 MCFPD and 7.60 bbls. of 52 degree corrected gravity condensate. Next two hours flowed through 12/64" choke, FTP 6075 psi. (DW), gas volume 4563 MCFPD and 6.60 bbls. of condensate. Next two hours flowed through 14/64" choke, FTP 5995 psi. (DW), gas volume 6025 MCFPD and 8.70 bbls. of condensate. Next one and one half hours flowed through 16/64" choke, FTP 5915 psi. (DW), gas volume 8009 MCFPD and undetermined amount of condensate to pits. Established 24 hour New Mexico Conservation Commission AOF Potential of 310,000 MCFPD. Completed January 22, 1963, as a "Wildcat" completion in Strawn (Pennsylvanian) formation. Total condensate recovery during 7-1/4 hrs. test was 22.80 bbls. to tank and undetermined amount to pits.

Well now shut in - Waiting on gas connection.

FORMATION RECORD

From	To	Feet	
0	12,058	12,058	
12,058	12,152	94	
12,152	12,477	325	Lime & Shale - Top Atoka 12,152'
12,477	13,366	889	Sand - Top Morrow 12,477'
13,366	14,583	1,217	Shale - Top Barnett Shale 13,366'
14,583	14,685	102	Lime - Top Mississippian 14,583'
14,685	15,138	453	Chert - Top Cherty 14,685'
15,138	15,518	380	Shale - Top Woodford 15,138
15,518	15,958	440	Lime & Dolomite - Top Devonian 15,518'
15,958	15,958		
		Total Depth	
	12,790	Plugged Back Total Depth	

Geological Tops by Schlumberger Gamma Ray
Sonic Log

APPENDIX B

IDENTIFICATION OF OPERATORS, LESSEES, SURFACE OWNERS, AND OTHER INTERESTED PARTIES WITHIN ONE MILE OF THE PROPOSED INDEPENDENCE AGI #2; NOTIFICATION LETTERS, PROOF OF DELIVERY AND AFFIDAVIT OF PUBLICATION

Figure B-1:	Surface owners and operators within a one-mile radius of the proposed Independence AGI #2 surface- and bottom-hole location
Figure B-2:	Lessees and mineral ownership within a one-mile radius of the proposed Independence AGI #2 surface- and bottom-hole location
Table B-1:	Summary List of surface owners, lessees, and mineral rights owners within one mile of the proposed Independence AGI #2 surface- and bottom-hole location, whom were provided notification and a complete copy of the C-108 application
Attachment A:	Notification letters sent to interested parties and proof-of-delivery
Attachment B:	Public Newspaper Notice and Affidavit of Publication

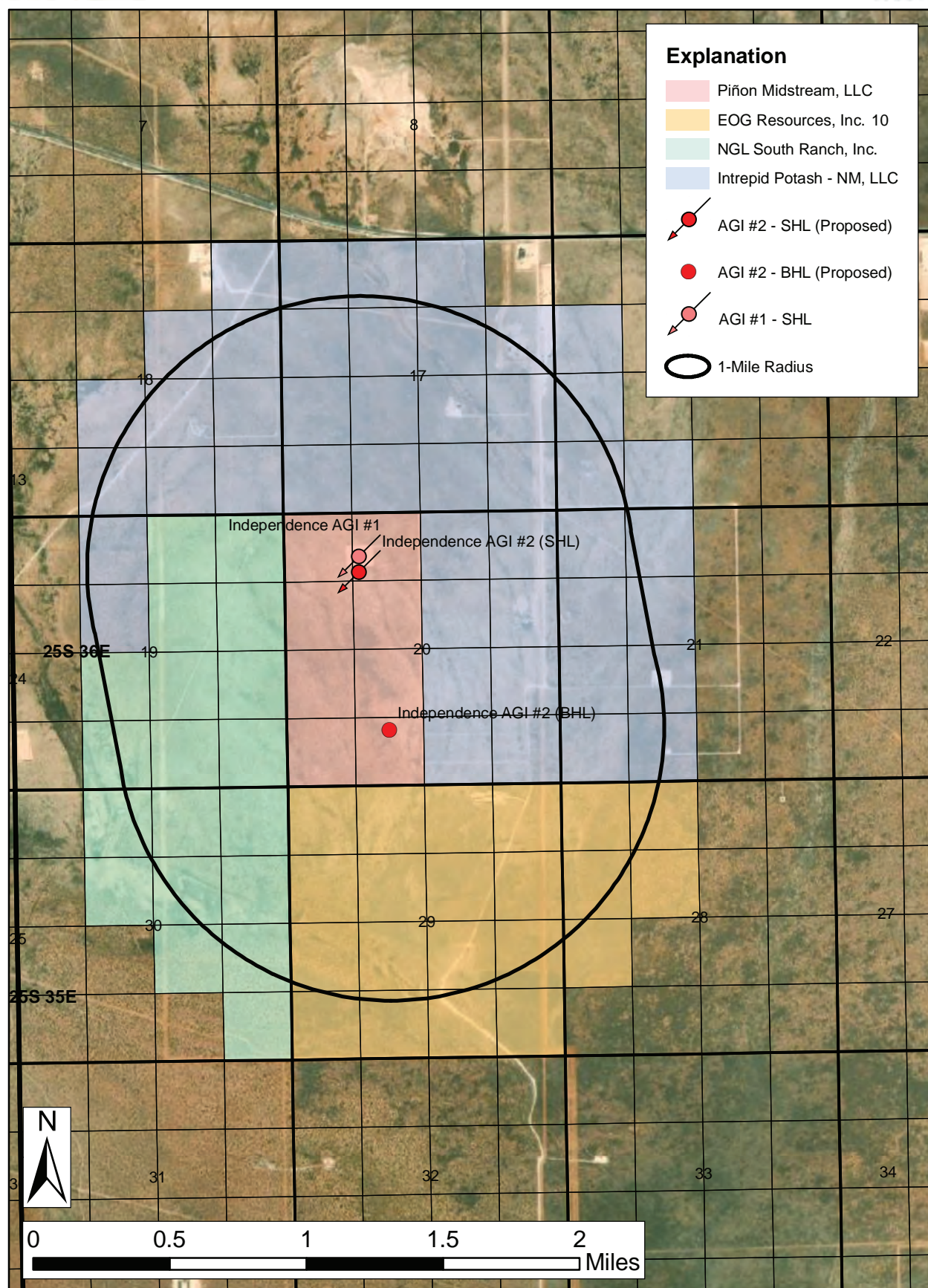


Figure B-1. Surface owners and active operators within one mile of proposed Independence AGI #2.

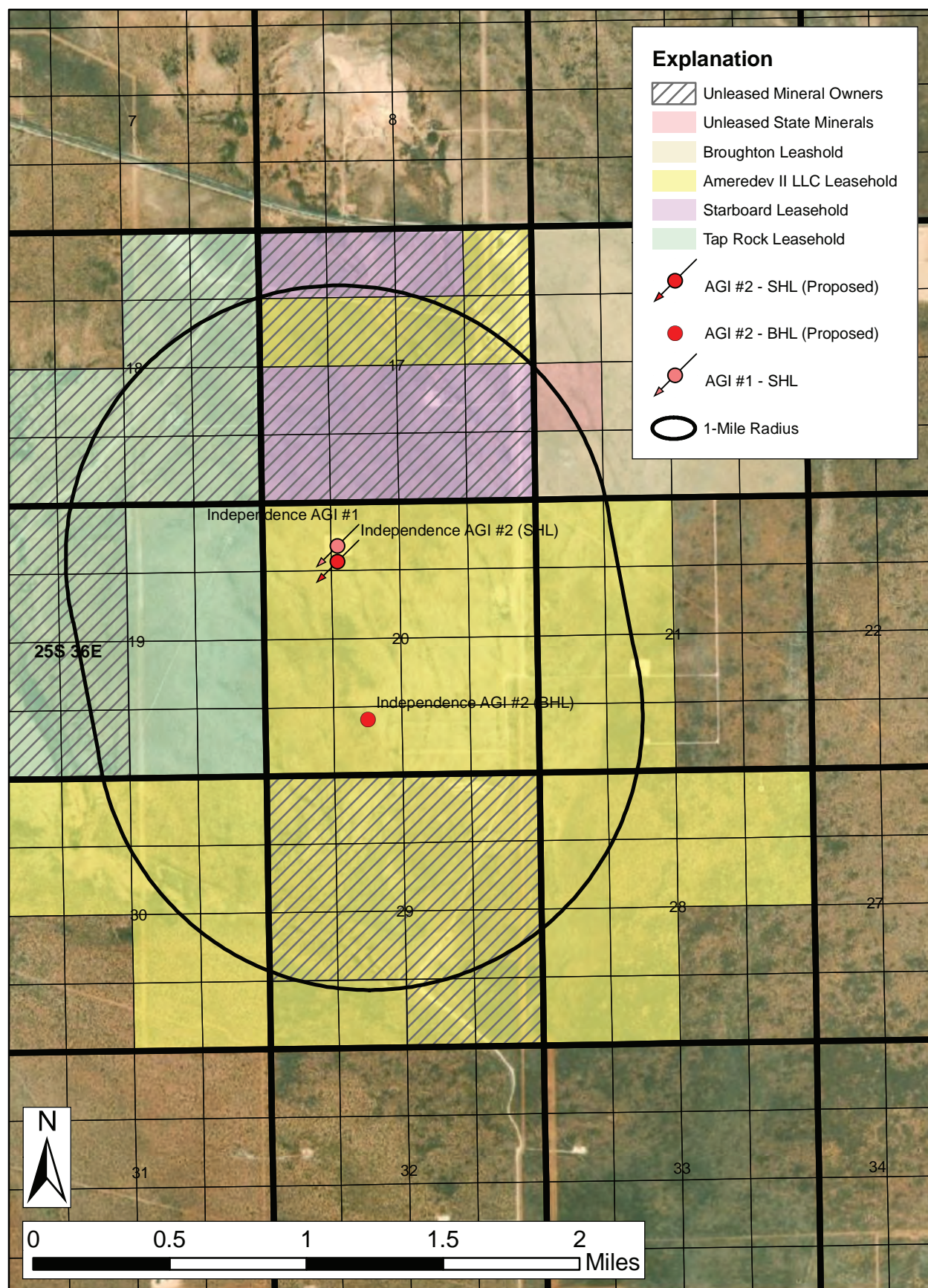


Figure B-2. Leaseholders and mineral ownership within one mile of the proposed AGI.
NOTE: State of NM and BLM hold mineral rights in all sections within one mile.

TABLE B-1. PARTIES TO BE INDIVIDUALLY NOTIFIED**Surface Owners:**

EOG Resources, Inc.
5509 Champions Drive
Midland, TX 79706
(432)686-3600

NGL South Ranch, Inc.
3773 Cherry Creek North Dr., Suite 1000
Denver, CO 80209
(918)481-1119

Intrepid Potash – New Mexico, LLC
1996 Potash Mines Rd.
Carlsbad, NM 88221
(575)887-5591

Active Operators:

Ameredev II, LLC
2901 Via Fortuna, Suite 600
Austin, TX 78746

Tap Rock Operating, LLC
523 Park Point Drive, Suite 200
Golden, CO 80401

BC & D Operating, Inc.
1008 West Broadway
Hobbs, NM 88240
(575)393-2727

Lessees:

Ameredev II, LLC
2901 Via Fortuna, Suite 600
Austin, TX 78746

Starboard Permian
5528 Vickery Boulevard
Dallas, TX 75206

Broughton Petroleum, Inc.
1205 Silliman St.
Sealy, TX 77474

Tap Rock Resources II, LLC
523 Park Point Drive, Suite 200
Golden, CO 80401

Mineral Rights Owners:

Bureau of Land Management
301 Dinosaur Trail
Santa Fe, NM 87508
(505)954-2000

Allison Marks
New Mexico State Land Office
310 Old Santa Fe Trail
Santa Fe, NM 87504-1148

ATTACHMENT A

Copies of Signed Notification Letters
and Proof of Delivery



Alberto A. Gutiérrez, C.P.G.

November 1, 2021

Ameredev II, LLC
2901 Via Fortuna, Suite 600
Austin, TX 78746

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: PIÑON MIDSTREAM, LLC PROPOSED INDEPENDENCE AGI WELL NO. 2

To Whom It May Concern:

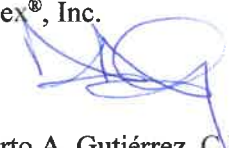
This letter is to advise you that Piñon Midstream, LLC (Piñon) intends to file the enclosed C-108 application (Application for Authorization to Inject) with the New Mexico Oil Conservation Division seeking administrative approval to drill and operate an acid gas injection (AGI) well, the Independence AGI No. 2 well, at their active Dark Horse Gas Treatment Facility in Lea County, New Mexico. The proposed Independence AGI No. 2 is intended to provide a redundant well option for existing acid gas injection operations and increase the total sour gas treatment capacity at the Dark Horse Facility.

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If you have any questions concerning this application, you may contact Alberto A. Gutiérrez or David White at (505)842-8000 at Geolex, Inc.®; 500 Marquette Avenue NW, Suite 1350; Albuquerque, New Mexico 87102.

Sincerely,
Geolex®, Inc.



Alberto A. Gutiérrez, C.P.G.
President & Consultant to Piñon Midstream

Enclosure: Complete Application for Authority to Inject (Form C-108)

P:\21-026 Pinon AGI #2 eval-permitting\Notifications & Publications\Interested Party Notification Letters\Ameredev Notice.docx

Page 1 of 1

phone: 505-842-8000
fax: 505-842-7380

500 Marquette Avenue NW, Suite 1350
Albuquerque, New Mexico 87102

email: aag@geolex.com
web: www.geolex.com



Alberto A. Gutiérrez, C.P.G.

November 1, 2021

BC & D Operating, Inc.
1008 West Broadway
Hobbs, NM 88240

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: PIÑON MIDSTREAM, LLC PROPOSED INDEPENDENCE AGI WELL NO. 2

To Whom It May Concern:

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Sincerely,
Geolex®, Inc.

A handwritten signature in blue ink, appearing to read "Alberto A. Gutierrez", written over a circular stamp or seal.

Alberto A. Gutiérrez, C.P.G.
President & Consultant to Piñon Midstream

Enclosure: Complete Application for Authority to Inject (Form C-108)

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Page 1 of 1

phone: 505-842-8000
fax: 505-842-7380

500 Marquette Avenue NW, Suite 1350
Albuquerque, New Mexico 87102

email: aag@geolex.com
web: www.geolex.com



Alberto A. Gutiérrez, C.P.G.

November 1, 2021

Bureau of Land Management
301 Dinosaur Trail
Santa Fe, NM 87508

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: PIÑON MIDSTREAM, LLC PROPOSED INDEPENDENCE AGI WELL NO. 2

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Geolex®, Inc.

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Alberto A. Gutiérrez, C.P.G.
President & Consultant to Piñon Midstream

Enclosure: Complete Application for Authority to Inject (Form C-108)

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Page 1 of 1

phone: 505-842-8000
fax: 505-842-7380

500 Marquette Avenue NW, Suite 1350
Albuquerque, New Mexico 87102

email: aag@geolex.com
web: www.geolex.com



Alberto A. Gutiérrez, C.P.G.

November 1, 2021

Broughton Petroleum, Inc.
1205 Silliman Street
Sealy, TX 77474

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: PIÑON MIDSTREAM, LLC PROPOSED INDEPENDENCE AGI WELL NO. 2

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Alberto A. Gutiérrez, C.P.G.
President & Consultant to Piñon Midstream

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Page 1 of 1

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Albuquerque, New Mexico 87102

email: aag@geolex.com
web: www.geolex.com



Alberto A. Gutiérrez, C.P.G.

November 1, 2021

EOG Resources, Inc.
5509 Champions Drive
Midland, TX 79706

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: PIÑON MIDSTREAM, LLC PROPOSED INDEPENDENCE AGI WELL NO. 2

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Alberto A. Gutiérrez, C.P.G.
President & Consultant to Piñon Midstream

Enclosure: Complete Application for Authority to Inject (Form C-108)

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Page 1 of 1

phone: 505-842-8000
fax: 505-842-7380

500 Marquette Avenue NW, Suite 1350
Albuquerque, New Mexico 87102

email: aag@geolex.com
web: www.geolex.com



Alberto A. Gutiérrez, C.P.G.

November 1, 2021

Intrepid Potash
1001 17th St., Suite 1050
Denver, CO 80202

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: PIÑON MIDSTREAM, LLC PROPOSED INDEPENDENCE AGI WELL NO. 2

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Enclosure: Complete Application for Authority to Inject (Form C-108)

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Page 1 of 1

phone: 505-842-8000
fax: 505-842-7380

500 Marquette Avenue NW, Suite 1350
Albuquerque, New Mexico 87102

email: aag@geolex.com
web: www.geolex.com



Alberto A. Gutiérrez, C.P.G.

November 1, 2021

NGL South Ranch, Inc.
3773 Cherry Creek N Drive, Suite 1000
Denver, CO 80209

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: PIÑON MIDSTREAM, LLC PROPOSED INDEPENDENCE AGI WELL NO. 2

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Enclosure: Complete Application for Authority to Inject (Form C-108)

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Page 1 of 1

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500 Marquette Avenue NW, Suite 1350
Albuquerque, New Mexico 87102

email: aag@geolex.com
web: www.geolex.com



Alberto A. Gutiérrez, C.P.G.

November 1, 2021

Allison Marks
New Mexico State Land Office
310 Old Santa Fe Trail
Santa Fe, NM 87504-1148

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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A handwritten signature in blue ink, appearing to read "AAG", is placed over the typed name of the signatory.

Alberto A. Gutiérrez, C.P.G.
President & Consultant to Piñon Midstream

Enclosure: Complete Application for Authority to Inject (Form C-108)

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Page 1 of 1

phone: 505-842-8000
fax: 505-842-7380

500 Marquette Avenue NW, Suite 1350
Albuquerque, New Mexico 87102

email: aag@geolex.com
web: www.geolex.com



Alberto A. Gutiérrez, C.P.G.

November 1, 2021

Starboard Permian
5528 Vickery Boulevard
Dallas, TX 75206

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: PIÑON MIDSTREAM, LLC PROPOSED INDEPENDENCE AGI WELL NO. 2

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President & Consultant to Piñon Midstream

Enclosure: Complete Application for Authority to Inject (Form C-108)

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Page 1 of 1

phone: 505-842-8000
fax: 505-842-7380

500 Marquette Avenue NW, Suite 1350
Albuquerque, New Mexico 87102

email: aag@geolex.com
web: www.geolex.com



Alberto A. Gutiérrez, C.P.G.

November 1, 2021

Tap Rock Operating, LLC
523 Park Point Dr., Suite 200
Golden, CO 80401

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: PIÑON MIDSTREAM, LLC PROPOSED INDEPENDENCE AGI WELL NO. 2

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President & Consultant to Piñon Midstream

Enclosure: Complete Application for Authority to Inject (Form C-108)

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Page 1 of 1

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fax: 505-842-7380

500 Marquette Avenue NW, Suite 1350
Albuquerque, New Mexico 87102

email: aag@geolex.com
web: www.geolex.com



TRACK ANOTHER SHIPMENT

775086504046



ADD NICKNAME

Delivered



DELIVERED

Signed for by: G.GRADY



GET STATUS UPDATES

OBTAIN PROOF OF DELIVERY

FROM

Liz Hill

500 MARQUETTE AVE. NW #1350
ALBUQUERQUE, NM US 87102
505-842-8000

TO

Ameredev II, LLC

2901 Via Fortuna
Ste 600
AUSTIN, TX US 78746
505-842-8000

MANAGE DELIVERY

Travel History

TIME ZONE
Local Scan Time



Tuesday, November 2, 2021

9:36 AM	AUSTIN, TX	Delivered
8:19 AM	AUSTIN, TX	On FedEx vehicle for delivery
7:24 AM	AUSTIN, TX	At local FedEx facility
5:37 AM	AUSTIN, TX	At destination sort facility
4:15 AM	MEMPHIS, TN	Departed FedEx hub

Monday, November 1, 2021		
11:02 PM	MEMPHIS, TN	Arrived at FedEx hub
7:01 PM	ALBUQUERQUE, NM	Left FedEx origin facility
5:36 PM	ALBUQUERQUE, NM	Picked up
3:58 PM		Shipment information sent to FedEx

Expand History 

Shipment Facts

TRACKING NUMBER 775086504046	SERVICE FedEx Standard Overnight	WEIGHT 1 lbs / 0.45 kgs
DELIVERY ATTEMPTS 1	DELIVERED TO Receptionist/Front Desk	TOTAL PIECES 1
TOTAL SHIPMENT WEIGHT 1 lbs / 0.45 kgs	TERMS Shipper	PACKAGING FedEx Envelope
SPECIAL HANDLING SECTION Deliver Weekday	SHIP DATE 11/1/21 	STANDARD TRANSIT 11/2/21 before 4:30 pm 
ACTUAL DELIVERY 11/2/21 at 9:36 am		



TRACK ANOTHER SHIPMENT

775086576940



ADD NICKNAME

ON TIME



Shipment is available for pickup at FedEx Facility: 210 WEST NAVAJO. We'll hold the shipment for five business days starting from November 04, 2021.

Scheduled delivery:
Pending pickup



READY FOR PICKUP

HOBBS, NM

GET STATUS UPDATES

FROM

Liz Hill

500 MARQUETTE AVE. NW #1350
ALBUQUERQUE, NM US 87102
505-842-8000

TO

BC & D Operating, Inc.
FedEx Facility

210 WEST NAVAJO
HOBBS, NM US 88240
575-393-2727

MANAGE DELIVERY

Travel History

TIME ZONE

Local Scan Time



Thursday, November 4,
2021

7:41 AM	HOBBS, NM	Ready for recipient pickup Package available for pickup at FedEx Facility: 210 WEST NAVAJO
---------	-----------	---

7:33 AM	HOBBS, NM	At local FedEx facility
---------	-----------	-------------------------

Wednesday, November 3,
2021

10:37 AM	HOBBS, NM	Delay Business closed- No delivery attempt
----------	-----------	---

Detailed Tracking

6:27 AM	HOBBS, NM	At local FedEx facility
Tuesday, November 2, 2021		
5:40 PM	HOBBS, NM	At local FedEx facility
3:09 PM		Delivery option requested Hold at FedEx Facility request received - Check back later for shipment status
10:41 AM	HOBBS, NM	Delay Customer not available or business closed.
9:43 AM	HOBBS, NM	At local FedEx facility
9:05 AM	HOBBS, NM	At local FedEx facility
6:28 AM	LUBBOCK, TX	At destination sort facility
4:33 AM	MEMPHIS, TN	Departed FedEx hub
Monday, November 1, 2021		
11:02 PM	MEMPHIS, TN	Arrived at FedEx hub
7:01 PM	ALBUQUERQUE, NM	Left FedEx origin facility
5:36 PM	ALBUQUERQUE, NM	Picked up
4:02 PM		Shipment information sent to FedEx

Expand History

Shipment Facts

TRACKING NUMBER 775086576940	SERVICE FedEx Standard Overnight	WEIGHT 1 lbs / 0.45 kgs
TOTAL PIECES 1	TOTAL SHIPMENT WEIGHT 1 lbs / 0.45 kgs	TERMS Shipper
PACKAGING FedEx Envelope	SPECIAL HANDLING SECTION Deliver Weekday	CUSTOMER EXCEPTION REQUEST NUMBER (CER) 1102C-41858924
SHIP DATE 11/1/21	SHIPMENT-FACTS.RECIPIENT-ADDRESS 1008 West Broadway, HOBBS, 88240, NM, US	SCHEDULED DELIVERY Pending pickup

dwhite@geolex.com

From: Santiago Flores <SFlores@Geolex.com>
Sent: Thursday, November 4, 2021 10:43 AM
To: dhill@wellconsultant.com
Cc: David White
Subject: Independence AGI #2 Permit Application and Notice
Attachments: C-108 Independence AGI #2 Permit Application 11-1 (Reduced).pdf; Notificaiton of Independence AGI #2 Permit Application.pdf

Good morning, Mr. Hill.

As an active operator within 1 mile of the proposed well (Independence AGI #2), BC&D is being notified of Piñon Midstream's intent to permit a redundant AGI well as part of the Dark Horse Gas Treatment Facility. The permit application and signed notification letter for the Independence AGI #2 are attached. Per our discussion today (Nov. 4th), digital copies of the signed notification letter and permit application are being sent to you as our records indicate that the hard copies, sent via FedEx on November 1st to 1008 West Broadway, Hobbs, NM 88240, have yet to be delivered. Please review the attachments and forward them to the appropriate personnel within your organization as you see fit.

Thank you for the additional information you provided me today, and if you have any questions, feel free to reach out any time.

Santiago Flores, M.S.
Geolex, Incorporated®
500 Marquette Ave. NW Suite 1350
Albuquerque, NM 87102
(505) 842-8000 Office
(505) 220-4613 Cell

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dwhite@geolex.com

From: Donnie Hill <dhill@wellconsultant.com>
Sent: Thursday, November 4, 2021 11:17 AM
To: Santiago Flores
Cc: David White
Subject: RE: Independence AGI #2 Permit Application and Notice

Good morning,

Thanks for submitting this to us. We will not protest this application.

Thanks,

DONNIE HILL
BC & D OPERATING, INC.
P.O. Box 302, Hobbs, NM 88241
575.390.7626 (Cell)
575.942.2005 (Fax)
dhill@wellconsultant.com

From: Santiago Flores [mailto:SFlores@Geolex.com]
Sent: Thursday, November 04, 2021 10:43 AM
To: Donnie Hill
Cc: David White
Subject: Independence AGI #2 Permit Application and Notice

Good morning, Mr. Hill.

As an active operator within 1 mile of the proposed well (Independence AGI #2), BC&D is being notified of Piñon Midstream's intent to permit a redundant AGI well as part of the Dark Horse Gas Treatment Facility. The permit application and signed notification letter for the Independence AGI #2 are attached. Per our discussion today (Nov. 4th), digital copies of the signed notification letter and permit application are being sent to you as our records indicate that the hard copies, sent via FedEx on November 1st to 1008 West Broadway, Hobbs, NM 88240, have yet to be delivered. Please review the attachments and forward them to the appropriate personnel within your organization as you see fit.

Thank you for the additional information you provided me today, and if you have any questions, feel free to reach out any time.

Santiago Flores, M.S.
Geolex, Incorporated®
500 Marquette Ave. NW Suite 1350

Albuquerque, NM 87102
(505) 842-8000 Office
(505) 220-4613 Cell

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TRACK ANOTHER SHIPMENT

775086927298



ADD NICKNAME

Delivered



DELIVERED

Signed for by: R.DURAN



GET STATUS UPDATES

OBTAIN PROOF OF DELIVERY

FROM

Liz Hill

500 MARQUETTE AVE. NW #1350
ALBUQUERQUE, NM US 87102
505-842-8000

TO

Bureau of Land Management

301 Dinosaur Trail
SANTA FE, NM US 87508
505-954-2000

MANAGE DELIVERY

Travel History

TIME ZONE
Local Scan Time



Tuesday, November 2, 2021

10:50 AM	SANTA FE, NM	Delivered
9:27 AM	SANTA FE, NM	On FedEx vehicle for delivery
8:21 AM	SANTA FE, NM	At local FedEx facility

Monday, November 1, 2021

8:18 PM	ALBUQUERQUE, NM	At local FedEx facility
7:24 PM	ALBUQUERQUE, NM	At destination sort facility



11/4/21, 9:03 AM

Detailed Tracking

7:00 PM	ALBUQUERQUE, NM	Left FedEx origin facility
5:36 PM	ALBUQUERQUE, NM	Picked up
4:26 PM		Shipment information sent to FedEx

Expand History 

Shipment Facts

TRACKING NUMBER 775086927298	SERVICE FedEx Standard Overnight	WEIGHT 0.5 lbs / 0.23 kgs
DELIVERY ATTEMPTS 1	DELIVERED TO Shipping/Receiving	TOTAL PIECES 1
TOTAL SHIPMENT WEIGHT 0.5 lbs / 0.23 kgs	TERMS Shipper	SHIPPER REFERENCE 21-026
PACKAGING FedEx Envelope	SPECIAL HANDLING SECTION Deliver Weekday	SHIP DATE 11/1/21 
STANDARD TRANSIT 11/2/21 before 4:30 pm 	ACTUAL DELIVERY 11/2/21 at 10:50 am	



TRACK ANOTHER SHIPMENT

775086697491



ADD NICKNAME

Delivered



DELIVERED

Signature not required

GET STATUS UPDATES

OBTAIN PROOF OF DELIVERY

FROM

Liz Hill

500 MARQUETTE AVE. NW #1350
ALBUQUERQUE, NM US 87102
505-842-8000

TO

Broughton Petroleum, Inc.

1205 Silliman St.
SEALY, TX US 77474
505-842-8000

MANAGE DELIVERY

Travel History

TIME ZONE
Local Scan Time



Tuesday, November 2, 2021

12:00 PM	SEALY, TX	Delivered Package delivered to recipient address - release authorized
9:42 AM	HOUSTON, TX	On FedEx vehicle for delivery
8:55 AM	HOUSTON, TX	At local FedEx facility
5:56 AM	HOUSTON, TX	At destination sort facility
4:41 AM	MEMPHIS, TN	Departed FedEx hub



Monday, November 1, 2021

11:02 PM	MEMPHIS, TN	Arrived at FedEx hub
7:01 PM	ALBUQUERQUE, NM	Left FedEx origin facility

5:36 PM	ALBUQUERQUE, NM	Picked up
4:10 PM		Shipment information sent to FedEx

Expand History 

Shipment Facts

TRACKING NUMBER 775086697491	SERVICE FedEx Standard Overnight	WEIGHT 1 lbs / 0.45 kgs
DELIVERY ATTEMPTS 1	DELIVERED TO Residence	TOTAL PIECES 1
TOTAL SHIPMENT WEIGHT 1 lbs / 0.45 kgs	TERMS Shipper	PACKAGING FedEx Envelope
SPECIAL HANDLING SECTION Deliver Weekday	SHIP DATE 11/1/21 	STANDARD TRANSIT 11/2/21 before 4:30 pm 
ACTUAL DELIVERY 11/2/21 at 12:00 pm		



TRACK ANOTHER SHIPMENT

775086302574



ADD NICKNAME

Delivered



DELIVERED

Signed for by: E.EOG



GET STATUS UPDATES

OBTAIN PROOF OF DELIVERY

FROM

Liz Hill

500 MARQUETTE AVE. NW #1350
ALBUQUERQUE, NM US 87102
505-842-8000

TO

EOG Resources

5509 Champions Drive
MIDLAND, TX US 79706
432-686-3600

MANAGE DELIVERY

Travel History

TIME ZONE
Local Scan Time



Tuesday, November 2, 2021

3:41 PM	MIDLAND, TX	Delivered
10:03 AM	MIDLAND, TX	On FedEx vehicle for delivery
9:26 AM	MIDLAND, TX	At local FedEx facility
6:28 AM	LUBBOCK, TX	At destination sort facility
4:33 AM	MEMPHIS, TN	Departed FedEx hub

Monday, November 1,
2021

11/2/21, 8:48 AM

Detailed Tracking

11:02 PM	MEMPHIS, TN	Arrived at FedEx hub
7:01 PM	ALBUQUERQUE, NM	Left FedEx origin facility
5:36 PM	ALBUQUERQUE, NM	Picked up
3:44 PM		Shipment information sent to FedEx

Expand History

Shipment Facts

TRACKING NUMBER 775086302574	SERVICE FedEx Standard Overnight	WEIGHT 1 lbs / 0.45 kgs
DELIVERY ATTEMPTS 1	DELIVERED TO Receptionist/Front Desk	TOTAL PIECES 1
TOTAL SHIPMENT WEIGHT 1 lbs / 0.45 kgs	TERMS Shipper	SHIPPER REFERENCE 21-026
PACKAGING FedEx Envelope	SPECIAL HANDLING SECTION Deliver Weekday	SHIP DATE 11/1/21
STANDARD TRANSIT 11/2/21 before 4:30 pm	ACTUAL DELIVERY 11/2/21 at 3:41 pm	



TRACK ANOTHER SHIPMENT

775087251680



ADD NICKNAME

Delivered



DELIVERED

Signature release on file

GET STATUS UPDATES

OBTAIN PROOF OF DELIVERY

FROM

Liz Hill

500 MARQUETTE AVE. NW #1350
ALBUQUERQUE, NM US 87102
505-842-8000

TO

Intrepid Potash - NM LLC

1001 17th St.
Ste 1050
DENVER, CO US 80202
575-887-5591

MANAGE DELIVERY

Travel History

TIME ZONE
Local Scan Time

Tuesday, November 2, 2021

10:20 AM	DENVER, CO	Delivered Package delivered to recipient address - release authorized
9:22 AM	DENVER, CO	On FedEx vehicle for delivery
7:21 AM	DENVER, CO	At local FedEx facility
5:12 AM	DENVER, CO	At destination sort facility
4:01 AM	MEMPHIS, TN	Departed FedEx hub

Monday, November 1, 2021

11:02 PM	MEMPHIS, TN	Arrived at FedEx hub
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11/4/21, 9:00 AM

Detailed Tracking

7:01 PM	ALBUQUERQUE, NM	Left FedEx origin facility
5:36 PM	ALBUQUERQUE, NM	Picked up
4:52 PM		Shipment information sent to FedEx

Expand History 

Shipment Facts

TRACKING NUMBER 775087251680	SERVICE FedEx Standard Overnight	WEIGHT 0.5 lbs / 0.23 kgs
DELIVERY ATTEMPTS 1	TOTAL PIECES 1	TOTAL SHIPMENT WEIGHT 0.5 lbs / 0.23 kgs
TERMS Shipper	SHIPPER REFERENCE 21-026	PACKAGING FedEx Envelope
SPECIAL HANDLING SECTION Deliver Weekday	SHIP DATE 11/1/21 	STANDARD TRANSIT 11/2/21 before 4:30 pm 
ACTUAL DELIVERY 11/2/21 at 10:20 am		

dwhite@geolex.com

From: Santiago Flores <SFlores@Geolex.com>
Sent: Tuesday, November 2, 2021 9:14 AM
To: 'Ralph Ramstetter'
Cc: David White
Subject: Independence AGI #1 Permit Application and Notice
Attachments: C-108 Independence AGI #2 Permit Application 11-1.pdf; Notification of Independence AGI #2 Permit Application - Intrepid.pdf

Good morning, Mr. Ramstetter.

As a surface owner within 1 mile of the proposed well (Independence AGI #2), Intrepid Potash is being notified of Piñon Midstream's intent to permit a redundant AGI well as part of the the Dark Horse Gas Treatment Facility. The permit application and signed notification letter for the Independence AGI #2 are attached. Per our discussion yesterday (Nov. 1st), the hard copies were sent to the Intrepid corporate headquarters located at 1001 17th St., Suite 1050, Denver, Colorado 80202, as FedEx was unable to recognize either of the New Mexico addresses which were provided to us (1996 Potash Mines Rd., Carlsbad, NM 88220 or 210 Red Cloud Rd., Carlsbad, NM 88220), however, we are sending the permit application to you via e-mail to ensure that personnel located closest to area of interest are notified. Please distribute the permit application and notification letter to the appropriate personnel within your organization.

Thank you for your time and the additional information you were able to provide us. If you have any questions, feel free to reach out at any time.

Santiago Flores, M.S.
Geolex, Incorporated®
500 Marquette Ave. NW Suite 1350
Albuquerque, NM 87102
(505) 842-8000 Office
(505) 220-4613 Cell

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TRACK ANOTHER SHIPMENT

775086415279



ADD NICKNAME

Delivered



DELIVERED

Signed for by: P.LIZA



GET STATUS UPDATES

OBTAIN PROOF OF DELIVERY

FROM

Liz Hill

500 MARQUETTE AVE. NW #1350
ALBUQUERQUE, NM US 87102
505-842-8000

TO

NGL South Ranch, Inc.

3773 Cherry Creek North Dr.,
Ste 1000
DENVER, CO US 80209
918-481-1119

MANAGE DELIVERY

Travel History

TIME ZONE
Local Scan Time

Tuesday, November 2, 2021

3:51 PM	DENVER, CO	Delivered
2:08 PM	DENVER, CO	On FedEx vehicle for delivery
1:53 PM	DENVER, CO	At local FedEx facility
9:28 AM	LITTLETON, CO	Operational Delay Incorrect address - Recipient moved
7:50 AM	LITTLETON, CO	At local FedEx facility

11/2/21, 8:50 AM

Detailed Tracking

5:12 AM	DENVER, CO	At destination sort facility
4:01 AM	MEMPHIS, TN	Departed FedEx hub
Monday, November 1, 2021		
11:02 PM	MEMPHIS, TN	Arrived at FedEx hub
7:01 PM	ALBUQUERQUE, NM	Left FedEx origin facility
5:36 PM	ALBUQUERQUE, NM	Picked up
3:53 PM		Shipment information sent to FedEx

Expand History

Shipment Facts

TRACKING NUMBER 775086415279	SERVICE FedEx Standard Overnight	WEIGHT 0.5 lbs / 0.23 kgs
DELIVERY ATTEMPTS 1	DELIVERED TO Receptionist/Front Desk	TOTAL PIECES 1
TOTAL SHIPMENT WEIGHT 0.5 lbs / 0.23 kgs	TERMS Shipper	SHIPPER REFERENCE 21-026
PACKAGING FedEx Envelope	SPECIAL HANDLING SECTION Deliver Weekday	SHIP DATE 11/1/21
STANDARD TRANSIT 11/2/21 before 4:30 pm	ACTUAL DELIVERY 11/2/21 at 3:51 pm	



TRACK ANOTHER SHIPMENT

775086978450



ADD NICKNAME

Delivered



DELIVERED

Signed for by: A.SANCHEZ



GET STATUS UPDATES

OBTAIN PROOF OF DELIVERY

FROM

Liz Hill

500 MARQUETTE AVE. NW #1350
ALBUQUERQUE, NM US 87102
505-842-8000

TO

Allison Marks

New Mexico State Land Office

310 Old Santa Fe Trail
SANTA FE, NM US 87504
505-842-8000

MANAGE DELIVERY

Travel History

TIME ZONE
Local Scan Time



Tuesday, November 2, 2021

9:47 AM	SANTA FE, NM	Delivered
9:05 AM	SANTA FE, NM	On FedEx vehicle for delivery
8:21 AM	SANTA FE, NM	At local FedEx facility

Monday, November 1, 2021

8:18 PM	ALBUQUERQUE, NM	At local FedEx facility
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11/4/21, 9:03 AM

Detailed Tracking

7:24 PM	ALBUQUERQUE, NM	At destination sort facility
7:00 PM	ALBUQUERQUE, NM	Left FedEx origin facility
5:36 PM	ALBUQUERQUE, NM	Picked up
4:30 PM		Shipment information sent to FedEx

Expand History 

Shipment Facts

TRACKING NUMBER 775086978450	SERVICE FedEx Standard Overnight	WEIGHT 0.5 lbs / 0.23 kgs
DELIVERY ATTEMPTS 1	DELIVERED TO Shipping/Receiving	TOTAL PIECES 1
TOTAL SHIPMENT WEIGHT 0.5 lbs / 0.23 kgs	TERMS Shipper	SHIPPER REFERENCE 21-026
PACKAGING FedEx Envelope	SPECIAL HANDLING SECTION Deliver Weekday	SHIP DATE 11/1/21 
STANDARD TRANSIT 11/2/21 before 4:30 pm 	ACTUAL DELIVERY 11/2/21 at 9:47 am	



TRACK ANOTHER SHIPMENT

775086732810



ADD NICKNAME

Delivered



DELIVERED

Signature not required

GET STATUS UPDATES

OBTAIN PROOF OF DELIVERY

FROM

Liz Hill

500 MARQUETTE AVE. NW #1350
ALBUQUERQUE, NM US 87102
505-842-8000

TO

Starboard Permian

5528 Vickery Boulevard
DALLAS, TX US 75206
505-842-8000

MANAGE DELIVERY

Travel History

TIME ZONE
Local Scan Time



Tuesday, November 2, 2021

2:03 PM	DALLAS, TX	Delivered Package delivered to recipient address - release authorized
8:52 AM	GARLAND, TX	On FedEx vehicle for delivery
8:08 AM	GARLAND, TX	At local FedEx facility
4:44 AM	DALLAS, TX	At destination sort facility
3:33 AM	MEMPHIS, TN	Departed FedEx hub

Monday, November 1, 2021

11:02 PM	MEMPHIS, TN	Arrived at FedEx hub
7:01 PM	ALBUQUERQUE, NM	Left FedEx origin facility

Detailed Tracking

5:36 PM

ALBUQUERQUE, NM



Picked up

4:12 PM

Shipment information sent to FedEx

Expand History 

Shipment Facts

TRACKING NUMBER 775086732810	SERVICE FedEx Standard Overnight	WEIGHT 1 lbs / 0.45 kgs
DELIVERY ATTEMPTS 1	DELIVERED TO Residence	TOTAL PIECES 1
TOTAL SHIPMENT WEIGHT 1 lbs / 0.45 kgs	TERMS Shipper	PACKAGING FedEx Envelope
SPECIAL HANDLING SECTION Deliver Weekday, Residential Delivery	SHIP DATE 11/1/21 	STANDARD TRANSIT 11/2/21 before 8:00 pm 
ACTUAL DELIVERY 11/2/21 at 2:03 pm		



TRACK ANOTHER SHIPMENT

775086650736



ADD NICKNAME

Delivered



DELIVERED

Signed for by: E.KASA



GET STATUS UPDATES

OBTAIN PROOF OF DELIVERY

FROM

Liz Hill

500 MARQUETTE AVE. NW #1350
ALBUQUERQUE, NM US 87102
505-842-8000

TO

Tap rock Operating, LLC

523 Park Point Drive
Suite 200
GOLDEN, CO US 80401
505-842-8000

MANAGE DELIVERY

Travel History

TIME ZONE
Local Scan Time



Tuesday, November 2, 2021



10:24 AM	GOLDEN, CO	Delivered
9:20 AM	DENVER, CO	On FedEx vehicle for delivery
7:42 AM	DENVER, CO	At local FedEx facility
5:12 AM	DENVER, CO	At destination sort facility
4:01 AM	MEMPHIS, TN	Departed FedEx hub

Monday, November 1,
2021

11:02 PM	MEMPHIS, TN	Arrived at FedEx hub
7:01 PM	ALBUQUERQUE, NM	Left FedEx origin facility
5:36 PM	ALBUQUERQUE, NM	Picked up
4:07 PM		Shipment information sent to FedEx

Expand History 

Shipment Facts

TRACKING NUMBER 775086650736	SERVICE FedEx Standard Overnight	WEIGHT 1 lbs / 0.45 kgs
DELIVERY ATTEMPTS 1	DELIVERED TO Receptionist/Front Desk	TOTAL PIECES 1
TOTAL SHIPMENT WEIGHT 1 lbs / 0.45 kgs	TERMS Shipper	PACKAGING FedEx Envelope
SPECIAL HANDLING SECTION Deliver Weekday	SHIP DATE 11/1/21 	STANDARD TRANSIT 11/2/21 before 4:30 pm 
ACTUAL DELIVERY 11/2/21 at 10:24 am		

ATTACHMENT B

Copy of Public Notice published in Hobbs News Sun on
October 26, 2021 and Affidavit of Publication

Affidavit of Publication

STATE OF NEW MEXICO
COUNTY OF LEA

I, Daniel Russell, Publisher of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, solemnly swear that the clipping attached hereto was published in the regular and entire issue of said newspaper, and not a supplement thereof for a period of 1 issue(s).

Beginning with the issue dated
October 26, 2021
and ending with the issue dated
October 26, 2021.

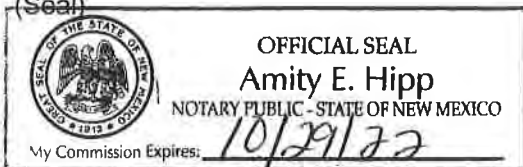

Publisher

Sworn and subscribed to before me this
26th day of October 2021.


Circulation Clerk

My commission expires
October 29, 2022

(Seal)



This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937 and payment of fees for said

LEGAL	LEGAL
LEGAL NOTICE October 26, 2021	
<p>Piñon Midstream, LLC; 465 W NM Highway 128; Jal, New Mexico 88252, is filing Form C-108 (Application for Authorization to Inject) with the New Mexico Oil Conservation Division for administrative approval for its acid gas injection (AGI) well Independence AGI #2. The proposed well will be a deviated well with a surface location of approximately 1,578 feet FWL & 1,180 feet FNL in Section 20, Township 25 South, Range 36 East, and a bottom-hole location of approximately 2,132 feet FWL and 1,033 feet FSL in Section 20, Township 25 South, Range 36 East, in Lea County, New Mexico. The well will dispose of waste carbon dioxide and hydrogen sulfide sourced from area production of sour natural gas, which will be injected into the Devonian through Fusselman geologic formations through an open-hole completion between approximately 16,080 feet and a total vertical depth of approximately 17,683 feet. The maximum allowable surface pressure will not exceed 5,005 psig. The Independence AGI #2 well is intended to provide a redundant well option for existing acid gas injection operations, via Independence AGI #1, and increase total treatment capacity for the Piñon Midstream Dark Horse Treatment Facility. The maximum injection rate for the AGI two-well system will not exceed 20 million standard cubic feet per day (MMSCFD). Interested parties opposing the action must file objections or requests for hearing with the Oil Conservation Division; 1220 South St. Francis Drive, Santa Fe, New Mexico 87505 within 15 days. Additional information can be obtained from the applicant's agent, Geolox, Inc.®, 500 Marquette Avenue NW, Suite 1350; Albuquerque, New Mexico 87102; (505) 842-8000. #36973</p>	

67101169

00259856

ALBERTO A. GUTIERREZ
GEOLEX, INC.
500 MARQUETTE AVE. NW, SUITE 1350
ALBUQUERQUE, NM 87102

APPENDIX C

**PRELIMINARY DRILLING-FLUIDS PROGRAM GENERATED BY
VALENCE DRILLING FLUIDS, LLC FOR THE PROPOSED
INDEPENDENCE AGI #2**



Independence AGI # 2
Tag Injection

Drilling Fluids Program

Prepared for

Diego Barreda

10-01-2021

Valence Drilling Fluids, LLC

12808 WCR 91

Midland, TX 79707



State: New Mexico

County: Lea

Legal SL: Sec 20, T-25-S, R-36-E

Rig: TBD

Estimated Days , Mud System, and Cumulative Cost

MD (ft)	Hole Size (in)	Drilling Days	Non –Drilling Days	Cumulative Days	Mud System	Cum. Cost
0' - 1,230'	26"	1	1	2	Fresh Water	
1,230' - 3,501'	22"	2	1	3	BDE	
3,501' - 7,174'	17.5"	3	1	4	BDE	
7,174' - 13,044'	12.25"	4	2	6	OBM	
13,044' - 16,477'	8.5"	3	2	5	OBM	
16,477' - 18,080'	5.875"	2	1	3	Fresh Water	

Products by Interval

MD (ft)	Products
0' - 1,230'	Gel, Soda Ash, Lime, Soap Sticks
1,230' - 3,501'	VX-Vis, Soda Ash, Lime, EX-23
3,501' - 7,174'	VX-Vis, Soda Ash, Lime, EX-23
7,174' - 13,044'	OBM, VG Plus, In-Force EB, In-Force OW, Lime, CaCl ₂ , In-Force RM
13,044' - 16,477'	OBM, VG Plus, In-Force EB, In-Force OW, Lime, CaCl ₂ , In-Force RM
16,477' - 18,080'	VX-Vis, Soda Ash, Lime

Contact List

Contact	Title	Office Phone	Cell Phone
Brad Veale	General Manager	(432) 561-8576	(972) 832-8892
Clay Gamble	Operations Manager	(432) 561-8576	(432) 770-9443
Nathan Lyons	Warehouse Manager	(432) 561-8576	(432) 269-5320

Estimated Formation Depths

Formation	Depth (TVD)	Comments
Dockum	246'	
Ochoa-Dewey	867'	
Rustler	1,130'	
Top Of Salt	1,720'	Salt
Base of Salt	3,401'	Salt
Capitan	3,977'	Possible Losses
Lamar LS	5,325'	
Bell Canyon	5,425'	Possible Losses
Brushy Canyon	7,058'	Possible Losses
Bone Spring	8,119'	Possible Pressure
1st Bone Spring Sh	9,500'	Possible Pressure
2nd Bone Spring Sh	9,994'	Possible Pressure
3rd Bone Spring Sh	11,148'	Possible Pressure
Wolfcamp Shale	11,381'	Possible Pressure
Wolfcamp B	11,593'	Possible Pressure
Strawn	11,790'	Possible Pressure
Atoka	12,733'	Possible Pressure
Morrow	13,690'	Possible Pressure
Devonian	16,103'	Possible Losses
Fusselman	17,218'	Possible Losses
Montoya	17,770'	Possible Losses
TVD	18,080'	

Drilling Fluids Summary

Surface Section - 26" Hole

MD (ft)	Cumulative Days	Mud System	Key Points			
0' - 1,230'	2	Spud Mud	<ul style="list-style-type: none"> Spud with fresh water circulating steel pits 1 Soap Sticks per connection will help penetration rate Circulate the hole at TD until shakers are clean 			
MD (ft)	Mud Weight (ppg)	Yield Point (lbf/100ft ²)	API F.L (ml/30 min)	pH (value)	LGS (% v/v)	LCM (ppb)
0' - 1,230'	8.4 - 8.7	2 - 18	NC	<8.5	<5%	As Needed

1st Intermediate - 22" Hole

MD (ft)	Cumulative Days	Mud System	Key Points			
1,230' - 3,501'	3	BDE	<ul style="list-style-type: none"> Displace Surface with BDE Maintain WPS above 165,000 ppm during BDE Watch for any signs of influxes and or water flows 			
MD (ft)	Mud Weight (ppg)	Yield Point (lbf/100ft ²)	API F.L (ml/30 min)	pH (value)	LGS (% v/v)	LCM (ppb)
1,230' - 3,501'	8.2 - 9.2	5-12	NC	>9.0	<8%	As Needed

2nd Intermediate - 17 1/2" Hole

MD (ft)	Cumulative Days	Mud System	Key Points			
3,501' - 7,174'	4	BDE	<ul style="list-style-type: none"> Displace Surface with BDE Maintain WPS above 165,000 ppm during BDE Watch for any signs of influxes and or water flows or losses in the Capitan 			
MD (ft)	Mud Weight (ppg)	Yield Point (lbf/100ft ²)	API F.L (ml/30 min)	pH (value)	LGS (% v/v)	LCM (ppb)
3,501' - 7,174'	8.2 - 9.2	5-12	NC	>9.0	<8%	As Needed

Continued on next page

Drilling Fluids Summary Cont.

3rd Intermediate - 12 1/4"

MD (ft)	Cumulative Days	Mud System	Key Points			
7,174' - 13,044'	6	OBM	<ul style="list-style-type: none"> Displace with OBM Maintain WPS above 280,000 ppm Watch for any signs of influxes and or water flows 			
MD (ft)	Mud Weight (ppg)	Yield Point (lbf/100ft ²)	HTHP F.L (ml/30 min)	ES (value)	LGS (% v/v)	LCM (ppb)
7,174' - 13,044'	10.0 - 12.0	8-14	<12cc	>400	<8%	As Needed

Production - 8.5"

MD (ft)	Cumulative Days	Mud System	Key Points			
13,044' - 16,477'	5	OBM	<ul style="list-style-type: none"> Displace with OBM Maintain WPS above 280,000 ppm Watch for any signs of influxes and or water flows 			
MD (ft)	Mud Weight (ppg)	Yield Point (lbf/100ft ²)	HTHP F.L (ml/30 min)	ES (value)	LGS (% v/v)	LCM (ppb)
13,044' - 16,477'	11.0 - 13.0	8-14	<12cc	>400	<8%	As Needed

Production Open Hole - 5.875"

MD (ft)	Cumulative Days	Mud System	Key Points			
16,477' - 17,900	3	Fresh water	<ul style="list-style-type: none"> Drill out with freshwater Pump Xan-Vis for hole cleaning sweeps Watch for any signs of influxes and or water flows 			
MD (ft)	Mud Weight (ppg)	Yield Point (lbf/100ft ²)	API F.L (ml/30 min)	pH (value)	LGS (% v/v)	LCM (ppb)
16,477' - 17,900	8.4 - 8.6	NA	NC	>9.5	<5%	As Needed

End of Summary

Surface

Measured Depth (ft)	Hole Size (in)	Mud Weight (ppg)	Yield Point (lb.f/100ft ²)	API F.L (ml/30 min)	pH (value)	LGS (% v/v)	Chlorides (mg/L)
0' - 1,230'	26"	8.4 - 8.7	2-18	NC	8.0 -8.5	<5%	1 - 5K
LCM (ppb)			As Needed				
Potential Hazards			Unconsolidated Formations/Lost Circulation/Drag/Torque				

Surface Section Summary

The surface section will be drilled with fresh water while pumping high vis sweeps for hole cleaning.

- ◆ Mix spud mud in suction pit using Fresh Water and Bentonite for a viscosity of 34-36 sec/quart. Maintain this viscosity circulating the working pits, jet and run water as needed to control viscosity and mud weight. Based on water quality it may be necessary to mix Soda Ash to reduce hardness below 300 ppm. This is to ensure proper Bentonite yield.
- ◆ The use of Soap Sticks may reduce bit balling and increase penetration rates. We recommend dropping one stick every connection.
- ◆ If seepage is severe or returns are lost mix in 100 bbls of Fresh Water, 1 sack Soda Ash then Bentonite for a 35 + sec/quart viscosity, Premium Blend II (8-10 ppb), LCF Blend (8-10 ppb) and Cottonseed Hulls (5 ppb). Pump the pills to the loss zone at a reduced pump rate until returns are regained.
- ◆ If circulation is not regained after the LCM pills then suggest drilling to TD on surface without returns, pumping viscous LCM pills as outlined above.
- ◆ At casing point sweep the well bore with 50 barrels of pre-mixed Fresh Water, Bentonite, Soda Ash, and Paper, having a funnel viscosity of 50-60 sec/quart.

Note: Some operators mix 50 Yellow Starch prior to casing point to thin wall cake for casing run.

1st Intermediate

Measured Depth (ft)	Hole Size (in)	Mud Weight (ppg)	Yield Point (lb.f/100ft ²)	API F.L (ml/30 min)	pH (value)	LGS (% v/v)	Chlorides (mg/L)
1,230' - 3,501'	22"	9.8-10.1	NC	NC	>9.0	<5%	>165K
LCM (ppb)			As Needed				
Potential Hazards			Lost Circulation/Water Influxes/H ₂ S/Drag/Torque				

Intermediate Section Summary

This section will be drilled with BDE utilizing the steel pit's for volume.

- ◆ In steel pits drill out with Brine Water from under surface casing. If BDE mud is already available from previous well use stored mud to drill out surface.
- ◆ Start additions of 1 ppb Xan-Vis once drilling the formation has started.
- ◆ Start additions of Diesel until desired weight is reached .
- ◆ After Diesel is added begin adding .25% - .33% gal/bbl of EX-23.
- ◆ Xan-Vis can be utilized for sweeps as needed to clean hole.
- ◆ Add Lime to maintain pH above 9.0.
- ◆ Use additions of brine water for hydration of mud do not use fresh water in this system.
- ◆ The BDE Mud will work best with less than 8% LGS, the best solids control efficiency practices available should always be implemented. If centrifuge is available use during this section nonstop after Xan-Vis has sheared in system.
- ◆ Severe losses are to be treated by pumping a Lost Circulation pill made by filling the slug pit with 100 barrels of Fresh Water. Mix 1 Soda Ash then Xan-Vis for a 34-36 sec/quart viscosity, LCF Blend (5-10 ppb), Nutshell (5-10 ppb), and Mica (5-10 ppb).
- ◆ Use two linear shakers with 140 mesh screens. We Recommend to use finer screens after 24 hours of drilling.
- ◆ Make sure to adjust pump rate to ensure proper hole cleaning.
- ◆ We recommend maintain a minimum "safe" mud weight in this interval to control losses/cost.
- ◆ If H₂S is encountered, we recommend the use of an H₂S Scavenger for personnel protection and a Filming Amine to protect the tubulars. Increase the pH with Lime to 11.5.

Note: It is imperative that we diligently monitor for signs of water influxes and/or flows. These may include but are not limited to changes in fluid color, rapidly decreasing PH, a noted increase on flow meter, etc. If a potential influx or flow is detected, it is imperative that there is immediate communication between the mud engineer, company man, drilling engineer, and all parties involved to discuss procedures going forward.

2nd Intermediate

Measured Depth (ft)	Hole Size (in)	Mud Weight (ppg)	Yield Point (lb.f/100ft ²)	API F.L (ml/30 min)	pH (value)	LGS (% v/v)	Chlorides (mg/L)
3,501' - 7,174'	17.5"	8.2-9.2	4-12	NC	>9.0	<8%	>165K
LCM (ppb)			As Needed				
Potential Hazards			Lost Circulation/Water Influxes/H ₂ S/Drag/Torque				

Intermediate II Section Summary

The 2nd intermediate will be with BDE utilizing the steel pit's for volume.

- ◆ Use mud from 1st Intermediate to drill 2nd Intermediate.
- ◆ Start additions of Diesel/Brine Water until desired weight is reached .
- ◆ After Diesel is added begin adding .25% - .33% gal/bbl of EX-23.
- ◆ Add Lime to maintain pH above 9.0.
- ◆ Use additions of brine water for hydration of mud do not use fresh water in this system.
- ◆ The BDE Mud will work best with less than 8% LGS, the best solids control efficiency practices available should always be implemented. If centrifuge is available use during this section nonstop after Xan-Vis has sheared in system.
- ◆ Severe losses are to be treated by pumping a Lost Circulation pill made by filling the slug pit with 100 barrels of Fresh Water. Mix 1 Soda Ash then Xan-Vis for a 34-36 sec/quart viscosity, LCF Blend (5-10 ppb), Nutshell (5-10 ppb), and Mica (5-10 ppb).
- ◆ Use two linear shakers with 140 mesh screens. We Recommend to use finer screens after 24 hours of drilling.
- ◆ We recommend maintain a minimum "safe" mud weight in this interval to control losses/cost.
- ◆ If H₂S is encountered, we recommend the use of an H₂S Scavenger for personnel protection and a Filming Amine to protect the tubulars. Increase the pH with Lime to 11.5.
- ◆ If losses are encountered in Capitain and are unable to be re-established suggest switching system to Freshwater and dry drill to section TD while pumping high viscosity sweeps to ensure hole cleaning.

Note: It is imperative that we diligently monitor for signs of water influxes and/or flows. These may include but are not limited to changes in fluid color, rapidly decreasing PH, a noted increase on flow meter, etc. If a potential influx or flow is detected, it is imperative that there is immediate communication between the mud engineer, company man, drilling engineer, and all parties involved to discuss procedures going forward.

3rd Intermediate

Measured Depth (ft)	Hole Size (in)	Mud Weight (ppg)	Yield Point (lb.f/100ft ²)	HTHP F.L (ml/30 min)	ES (value)	LGS (% v/v)	Chlorides (mg/L)
7,174' - 13,044'	12.25"	10.0-12.0	8-14	<15cc	>400	<8%	>280K
LCM (ppb)			As Needed				
Possible Hazards			Water Flows, Gas Kicks				

Production Section Summary

The 3rd intermediate will be drilled with OBM, it will be important to control the solids content of this system to maximize performance.

- ◆ Drill out from under 2nd Intermediate with OBM in steel pits.
- ◆ Displace 10.0-10.5 ppg OBM Fluid.
- ◆ Increase MW as required for pressure control and wellbore stability.
- ◆ Keep Low Gravity Solids below 8% in the lateral.
- ◆ Maintain Chloride levels above 280,000 to control inhibition.
- ◆ Maintain 45-55 sec/quart viscosity.
- ◆ Maintain Electrical Stability above 400.
- ◆ Maintain Oil/Water ratio of 80/20 to 75/25.
- ◆ Drill ahead adjusting properties to meet hole conditions.
- ◆ Adjust low end rheology with In-Force RM as needed for hole cleaning.
- ◆ Add Gilsonite as needed to maintain <15cc fluid loss control with no free water.
- ◆ Use torque, drag, and fill on connections as indicators to increase mud weight or chlorides.
- ◆ G-Seal may be added to enhance penetration rates while sliding and as needed for lost circulation.
- ◆ Use two linear shakers with 140 mesh screens. You may opt to use finer screens after 24 hours of drilling.
- ◆ We recommend maintaining a minimum "safe" mud weight in this interval to control losses/costs.

Note: It is imperative that we diligently monitor for signs of water influxes and/or flows. These may include but are not limited to changes in fluid color, rapidly decreasing PH, a noted increase on flow meter, etc. If a potential influx or flow is detected, it is imperative that there is immediate communication between the mud engineer, company man, drilling engineer, and all parties involved to discuss procedures going forward.

4th Intermediate

Measured Depth (ft)	Hole Size (in)	Mud Weight (ppg)	Yield Point (lb.f/100ft2)	HTHP F.L (ml/30 min)	ES (value)	LGS (% v/v)	Chlorides (mg/L)
13,044' - 16,477'	8.5"	11.0-13.0	8-14	<15cc	>400	<8%	>280K
LCM (ppb)			As Needed				
Potential Hazards			Lost Circulation/Water Influxes/H2S/Drag/Torque				
Intermediate II Section Summary							
The 4th intermediate will be drilled with OBM, it will be important to control the solids content of this system to maximize performance.							

- ◆ Drill out from under 3rd Intermediate with OBM in steel pits.
- ◆ Displace 11.0 ppg OBM Fluid.
- ◆ Increase MW as required for pressure control and wellbore stability.
- ◆ Keep Low Gravity Solids below 8% in the lateral.
- ◆ Maintain Chloride levels above 280,000 to control inhibition.
- ◆ Maintain 45-55 sec/quart viscosity.
- ◆ Maintain Electrical Stability above 400.
- ◆ Maintain Oil/Water ratio of 80/20 to 75/25.
- ◆ Drill ahead adjusting properties to meet hole conditions.
- ◆ Adjust low end rheology with In-Force RM as needed for hole cleaning.
- ◆ Add Gilsonite as needed to maintain <15cc fluid loss control with no free water.
- ◆ Use torque, drag, and fill on connections as indicators to increase mud weight or chlorides.
- ◆ G-Seal may be added to enhance penetration rates while sliding and as needed for lost circulation.
- ◆ Use two linear shakers with 140 mesh screens. You may opt to use finer screens after 24 hours of drilling.
- ◆ We recommend maintaining a minimum "safe" mud weight in this interval to control losses/costs.

Note: It is imperative that we diligently monitor for signs of water influxes and/or flows. These may include but are not limited to changes in fluid color, rapidly decreasing PH, a noted increase on flow meter, etc. If a potential influx or flow is detected, it is imperative that there is immediate communication between the mud engineer, company man, drilling engineer, and all parties involved to discuss procedures going forward.

Open Hole

Measured Depth (ft)	Hole Size (in)	Mud Weight (ppg)	Yield Point (lbf/100ft ²)	API F.L (ml/30 min)	pH (value)	LGS (% v/v)	Chlorides (mg/L)
16,477' - 18,080'	5.875"	8.4 - 8.6	NA	NC	>9.5	<5%	<50K
LCM (ppb)			Acid Soluble LCM				
Possible Hazards			Losses				

Open Hole Section Summary

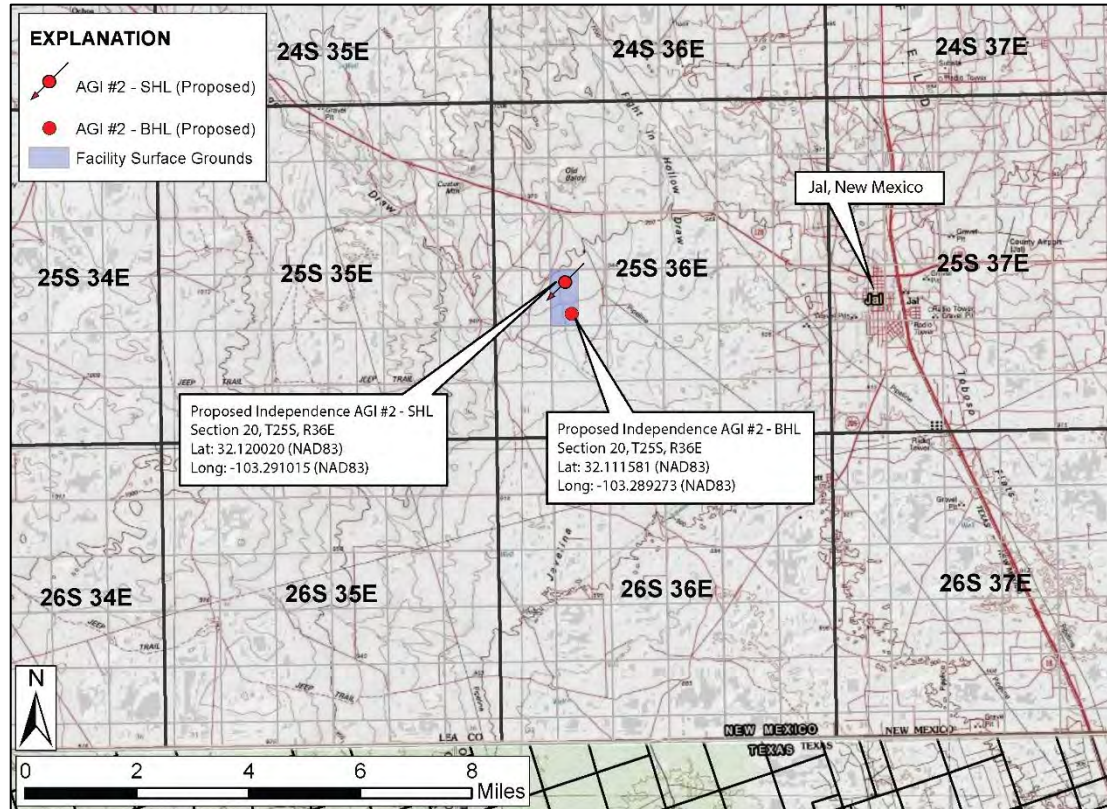
The open hole section will be drilled with freshwater and VX-Vis sweeps and it will be important to control mud weight for wellbore stability. Use only acid soluble LCM if losses occur.

- ◆ Drill out production casing with fresh water in steel pits.
- ◆ Maintain >9.5 pH with Lime mixed through the chemical barrel. Do not mix Lime through the mud hopper. Use all PPE when mixing.
- ◆ Use Xan-Vis at a 45-50 sec/quart for sweeps as needed for hole cleaning.
- ◆ Severe losses are to be treated by pumping an Acid Soluble Lost Circulation pill made by filling the slug pit with 100 barrels of Cut Brine mixing 1 sack Soda Ash. Then mix VX-Vis for a 38 sec/quart viscosity, Calcium Carbonate (5–10 ppb), Magma Fiber (5–10 ppb), and Clean Seal (5-10 ppb).
- ◆ We recommend 140 mesh screens if mud up is required for logging. After 12 to 24 hours of drilling adjust screens to 210+.
- ◆ 200' prior to TD begin additions of Xan-Vis for 40-42 sec/quart viscosity and also lower filtrate control below 8cc while using White Starch **if logs are desired**.
- ◆ While mudded up add Bio-Force, 10 gal/tour for bacteria control.
- ◆ If packer fluid is required can be provided upon request.
- ◆ In this section only pump Acid soluble LCM.



APPLICATION TO AMEND COMMISSION ORDER R-21455-A

Request for Maximum Daily Injection Rate Increase



Pinon Midstream, LLC
Independence AGI #1 and #2

Presented in Hearing Before the
New Mexico Oil Conservation Commission
Case #22977

September 8, 2022

BEFORE THE OIL CONSERVATION COMMISSION

Santa Fe, New Mexico

Exhibit No. E

Submitted by: **Piñon Midstream, LLC**

Hearing Date: September 8, 2022

Case No. 22977

GEOLEX
INCORPORATED

Application prepared by:

Geolex, Inc.®

500 Marquette Ave NW, #1350

Albuquerque, NM 87102

(505)842-8000

PINON MIDSTREAM, LLC WITNESSES

▶ STEVEN GREEN – Pinon Midstream, LLC

- Chief Executive Officer and Co-Founder – Piñon Midstream, LLC
- B.S. Mechanical Engineering (Mississippi State University)
- Extensive experience in the design, operation, and construction of natural gas pipelines, compression systems, sour gas treatment, and gas processing facilities

▶ DAVID A. WHITE, P.G. – Geolex, Inc.®

- Registered Professional Geologist (P.G.)
- M.S. Geology (University of New Mexico)
- Extensive project management experience and geologic support for AGI projects
- Permitted, designed, and constructed AGI wells in Permian Basin
- Expert in petroleum geology, seismic interpretation, and fault-slip probability modeling

PRESENTATION TOPICS FOR EACH WITNESS

- ▶ **STEVEN GREEN** -- Describe current Pinon Midstream NM operations, long-term development plans and on-going efforts, overall benefits of Piñon gas-treating plant, and role of AGI project in gas facility operations.
- ▶ **DAVID A. WHITE, P.G.** -- Provide overview of Independence AGI #1 and #2 project and permitting history; general summary of AGI #2 approved C-108 application, including relevant site geology and system design; results of induced-seismicity risk assessment and injection modeling/simulation results which demonstrate feasibility of proposed injection volume amendment.

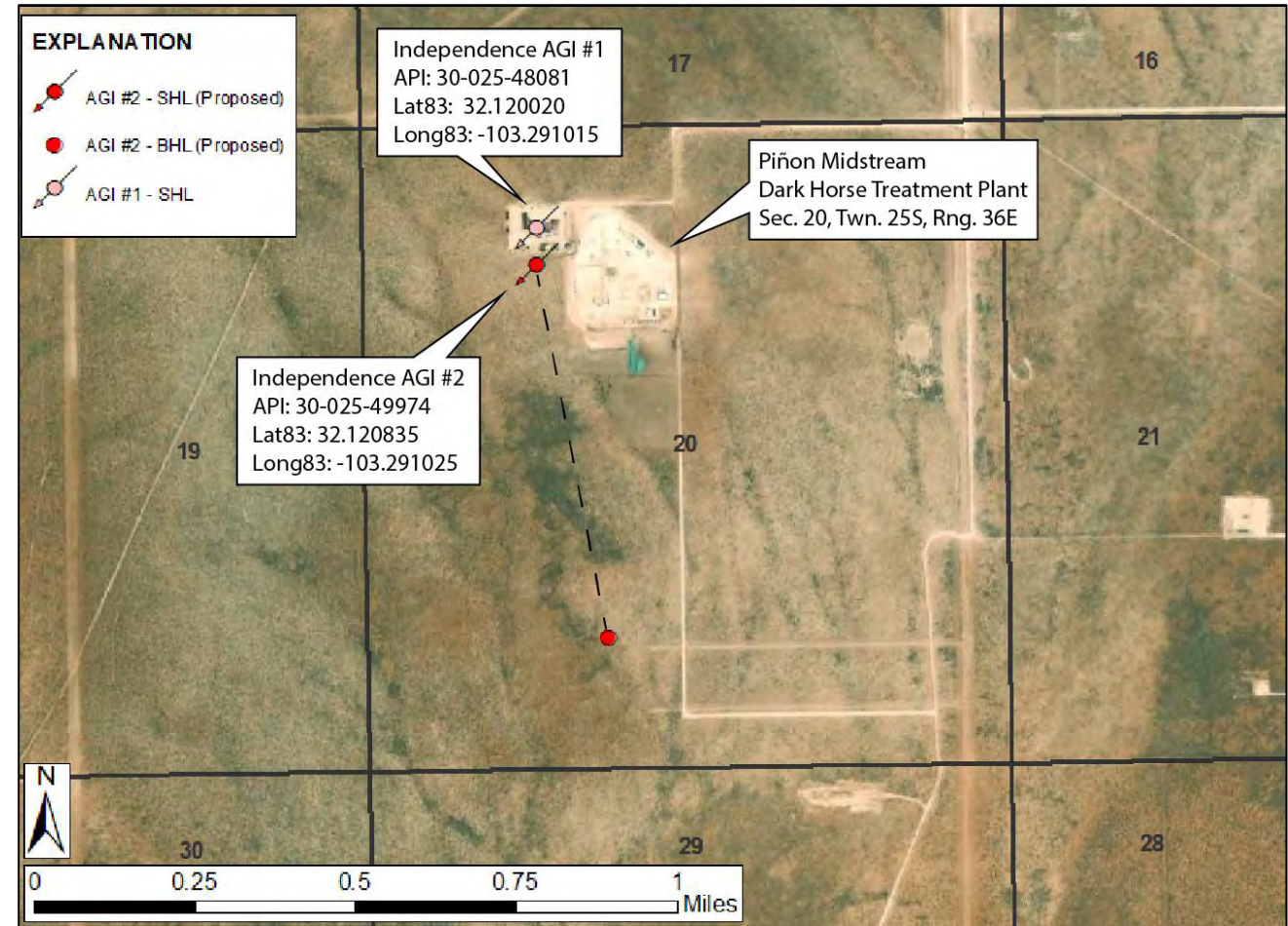
PINON'S REQUEST OF THE COMMISSION

Pinon is seeking amendment of the existing NMOCC Order R-21455-A to authorize a combined daily injection volume limitation of up to a maximum of 20 MMSCFD for the Independence AGI #1 and #2 wells

- ▶ The requested volume (20 MMSCFD) is necessary to meet the anticipated acid gas disposal needs of oil and gas production operations in the area
- ▶ At reservoir conditions, the requested 20 MMSCFD will occupy a volume of approximately 8,200 barrels per day, which is significantly less than typical saltwater disposal well (SWD) daily injection volumes
 - For comparison, the current injection volume limitation of 12 MMSCFD would occupy approximately 4,900 barrels per day at reservoir pressure and temperature conditions, which were verified through direct measurement during the drilling and completion of Independence AGI #1
- ▶ Utilization of amine treatment and AGI wells at the Pinon facility is necessary to avoid flaring and prevent waste, prevent atmospheric release of production-related CO₂, and assure operational stability at the Pinon treatment plant
- ▶ All Form C-108 application materials necessary to support the request for a daily volume limitation of 20 MMSCFD were included in the original November 4, 2021, application submitted to NMOCD for technical and administrative review

FACILITY AND AGI WELL LOCATIONS

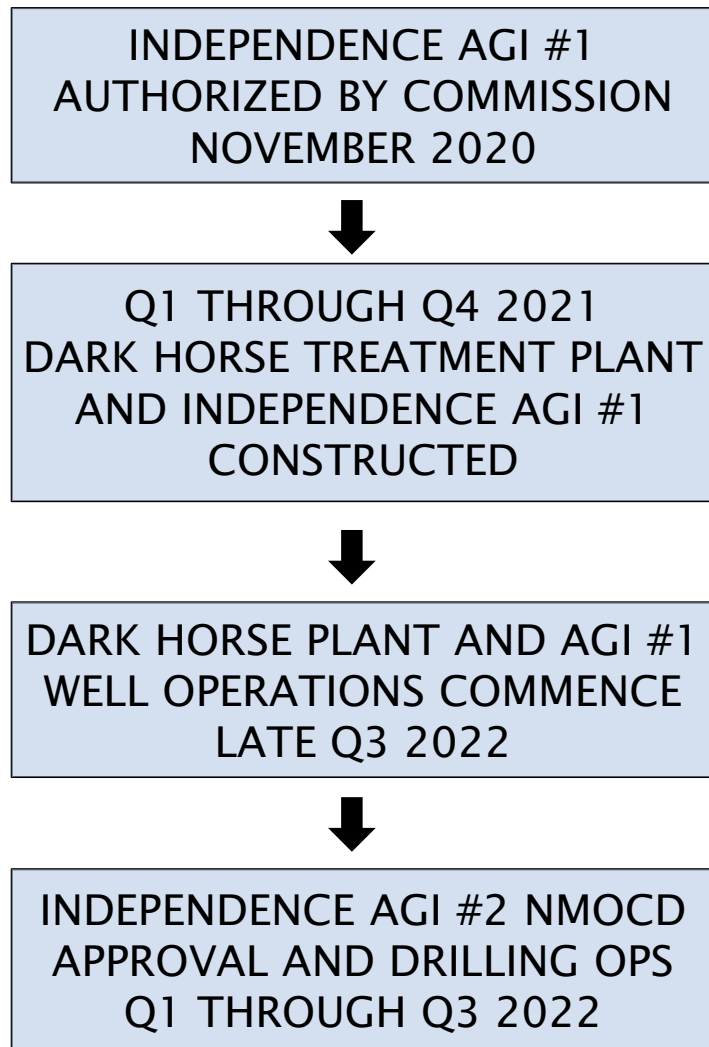
- ▶ The Dark Horse Gas Treatment Facility and AGI wells are located approximately six (6) miles west of Jal, NM
- ▶ Independence AGI #1 was drilled as a vertical well at 829 FNL & 1,443 FWL (Well completed in August 2021)
- ▶ Independence AGI #2 is being constructed as a deviated well with a surface location of 1,110 FNL & 1,443 FWL (Currently being drilled)
- ▶ The wells, facility, and project area are located on lands owned by Piñon Midstream, LLC (W/2 Section 20)



General location map showing the Piñon Dark Horse facility and AGI well locations

PINON OPERATIONS AND AGI PERMITTING TIMELINE

- ▶ Pinon Midstream gas treatment operations commenced after construction of the Dark Horse Treatment Facility, which was completed and placed in service in the summer/fall of calendar year 2021
- ▶ The facility was specifically designed to utilize amine treatment and acid gas injection wells as the primary method for handling and disposal of carbon dioxide (CO₂) and hydrogen sulfide (H₂S) wastes associated with the production of natural gas resources
- ▶ Independence AGI #1 (API: 30-025-48081), which was authorized for operation as a UIC Class II AGI well by the NMOCC on November 4, 2020, was constructed and placed in service coincident with the start of treatment plant operations
- ▶ The original approval of the Independence AGI #1 well authorized AGI operations at an injection rate up to 12 MMSCFD (million standard cubic feet per day) with a maximum allowable surface injection pressure of 4,779 psig.



REDUNDANT AGI – INDEPENDENCE AGI #2

- ▶ To ensure Pinon's operational ability to meet the gas-treatment needs of local production and fulfill special conditions of NMOCC Order R-21455-A, a C-108 injection permit application was developed for a second AGI well, the Independence AGI #2.
- ▶ The Independence AGI #2 Form C-108 Injection Permit Application was submitted to NMOCD for administrative and technical review on November 4, 2021 (partially fulfilling Commission timeline requirements).
- ▶ As part of the AGI #2 permit application, Pinon requested approval for a combined daily injection rate of 20 MMSCFD for the Independence AGI #1 and #2 wells and submitted all necessary modeling and simulation results to NMOCD for technical review.
- ▶ The Independence AGI #2 application was approved by NMOCD on March 31, 2021, through issuance of Administrative Order SWD-2464, however, NMOCD determined that the requested increase to the daily volume limitation could not be authorized via the administrative process.

BENEFITS OF PINON'S AGI DISPOSAL SYSTEM

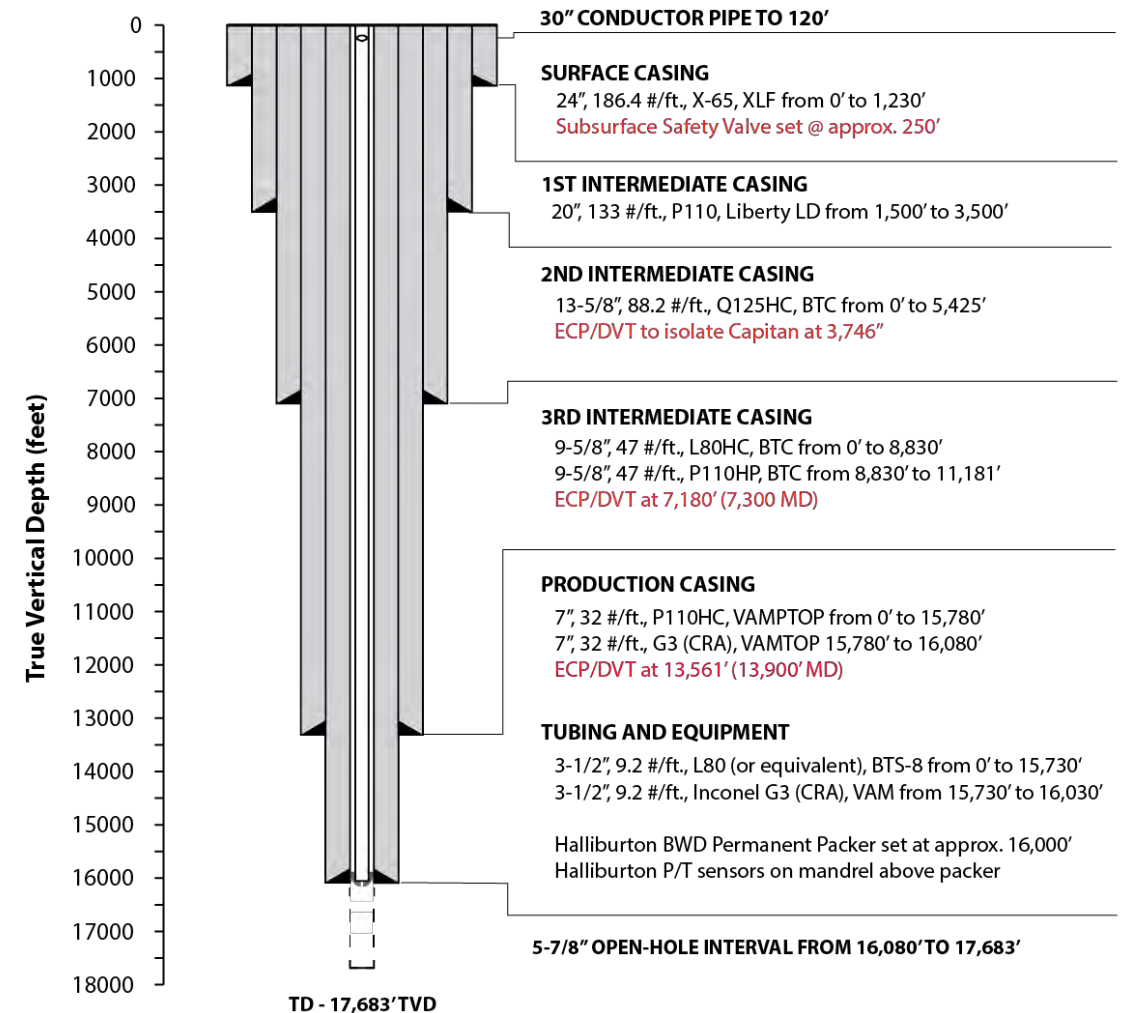
- ▶ The AGI project has the substantial environmental benefit of greenhouse gas reduction due to the sequestration of CO₂, which otherwise would be released to the atmosphere
- ▶ AGI projects reduce waste and air emissions by eliminating flaring of acid gas or operation of a sulfur recovery unit as an H₂S control measure
- ▶ As proposed, the Piñon treatment facility and AGI wells will provide area producers with the additional treatment capacity required and reduce the likelihood of waste and flaring at the wellhead
- ▶ As proposed, the Independence AGI #1 and #2 well system will permanently sequester approximately 858 tons of CO₂ and 285 tons of H₂S per day

DRILLING INDEPENDENCE AGI #2

- ▶ To assure compliance with the requirements and special conditions of NMOCC Order R-21455-A, Piñon has continued in their effort to drill and complete the approved redundant AGI #2 well at the Dark Horse Facility
- ▶ Independence AGI #2 drilling operations commenced in May 2022 and total depth of the well is expected to be reached in mid- to late-September 2022.
- ▶ Completion and well-testing operations will follow drilling operations and currently the AGI #2 well is on track to be in service before the November 4, 2022 deadline, meeting all redundant well timeline requirements of Order R-21455-A, Special Condition 18.

DESIGN OF INDEPENDENCE AGI #2

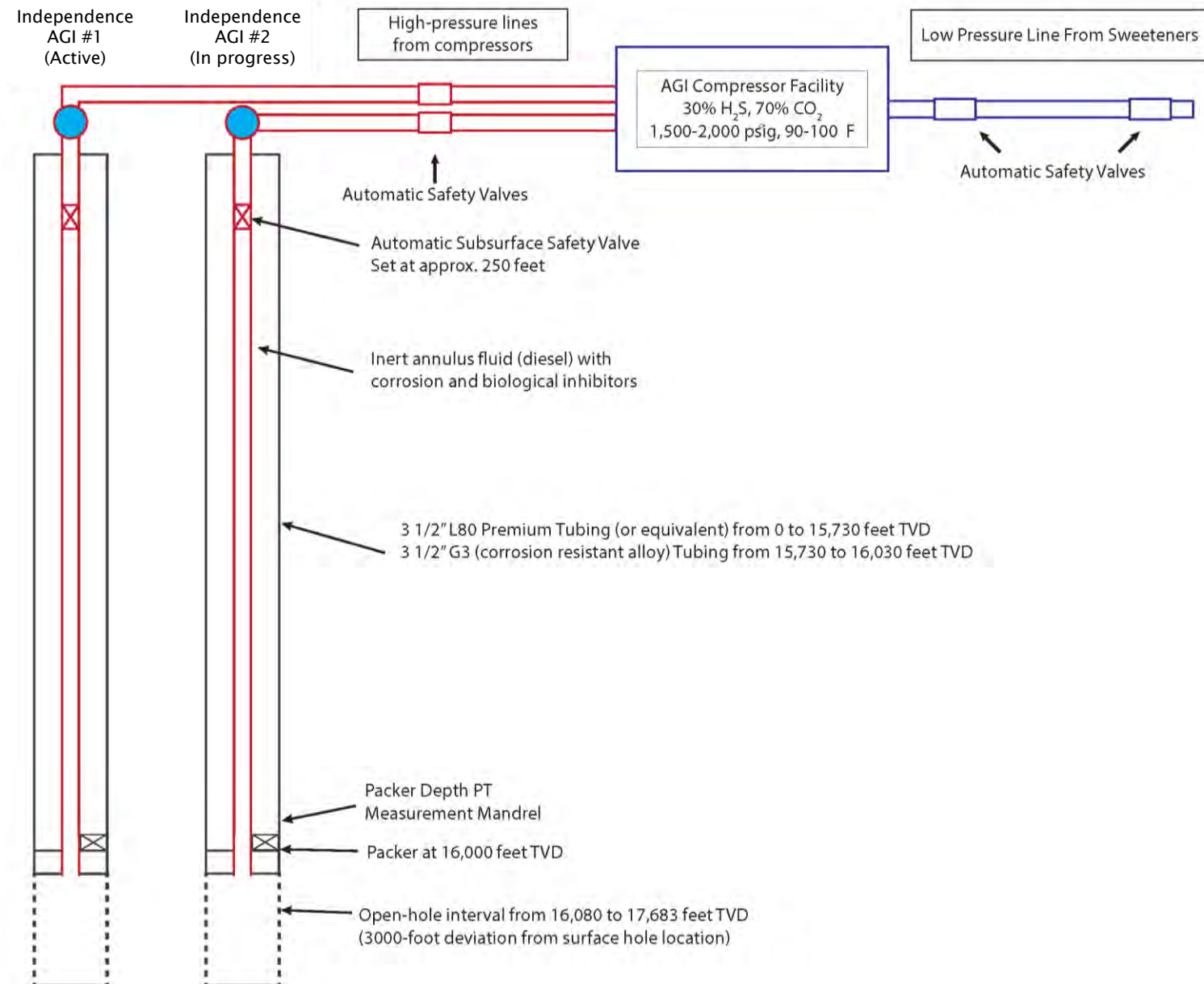
- ▶ Similar to Independence AGI #1, the AGI #2 redundant well is being constructed in accordance with AGI industry best practices and incorporates specific input from NMOCD technical staff.
- ▶ The AGI #2 casing plan includes a 5-string design, with individual isolation of the shallow Salado Salt and Capitan Reef formations through utilization of an additional casing string, external casing packers (ECP), and cement diverter tools.
- ▶ Critical intervals of casing and tubing, where corrosive conditions may be more likely to develop, utilize corrosion-resistant alloy material grades, specifically G3 CRA casing and injection tubing from approximately 15,730' to 16,080'.
- ▶ The AGI #2 well design includes additional down-hole monitoring and safety equipment, including a subsurface safety valve (SSSV), down-hole pressure and temperature sensors, and a permanent injection packer, all of which are constructed with Inconel 925-grade materials (or equivalent) and are rated for acid gas injection service.



Independence AGI #2 general well schematic including anticipated casing program

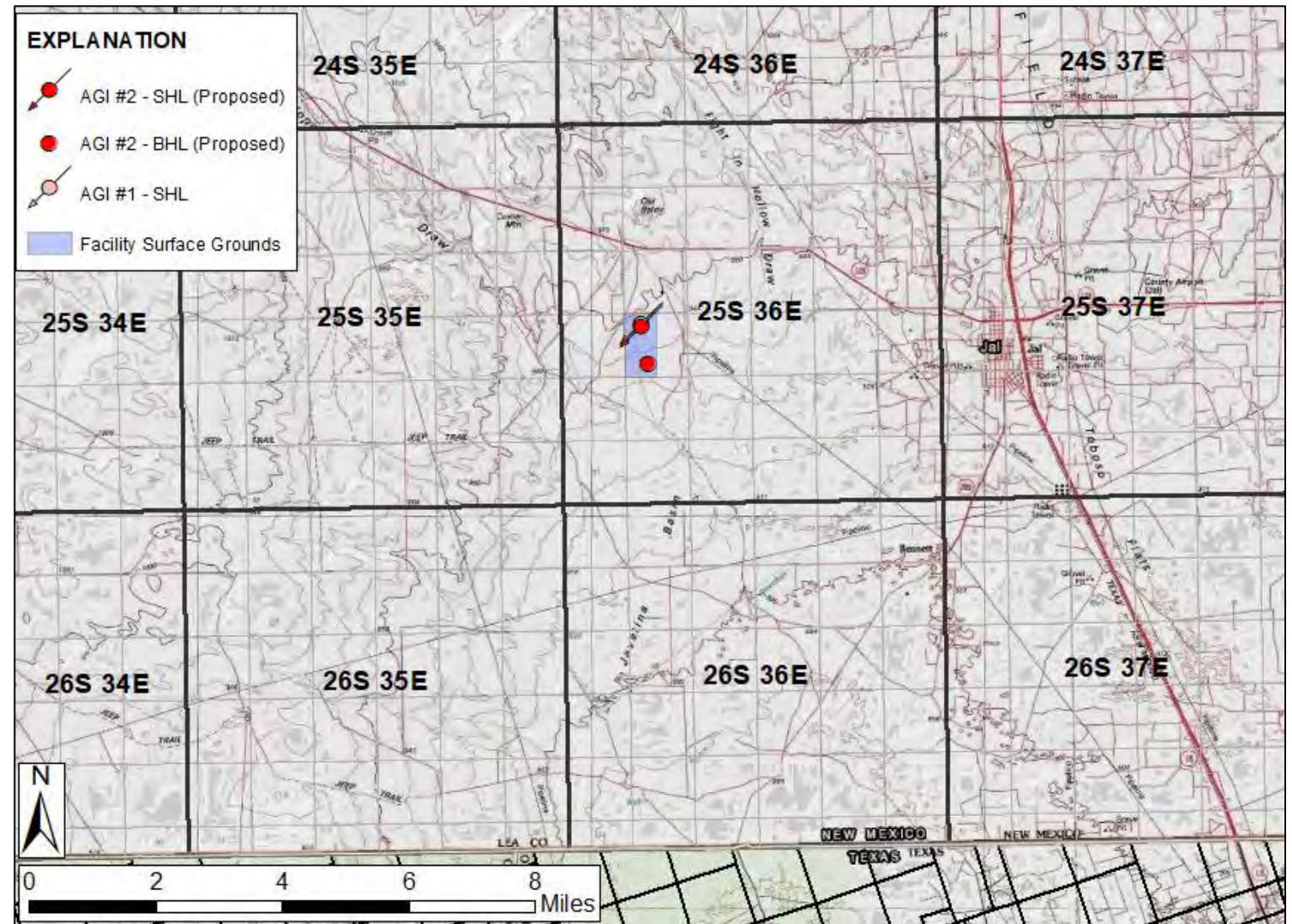
AGI SYSTEM DESIGN

- ▶ Current composition of treated acid gas (TAG) is approximately 70% CO₂ and 30% H₂S with trace concentrations of nitrogen and light (C₁-C₇) hydrocarbons
- ▶ TAG is transmitted from the amine system to compressors on the well site via low-pressure pipelines (see right)
- ▶ Acid gas is compressed to approximately 1,500 to 2,500 psi and transmitted to the AGI well through corrosion-resistant tubulars protected by automatic safety valves
- ▶ Injection trees are/will be constructed utilizing corrosion-resistant alloys in accordance with AGI well design standards
- ▶ A subsurface safety valve (SSSV) is set at approximately 250' below the surface
- ▶ The permanent injection packer and the lower 300 feet of tubing and production casing are constructed utilizing corrosion-resistant alloy materials
- ▶ Bottom-hole pressure and temperature transducers are installed on a mandrel overlying the packer and provide real-time monitoring of the injection zone



GENERAL LOCATION

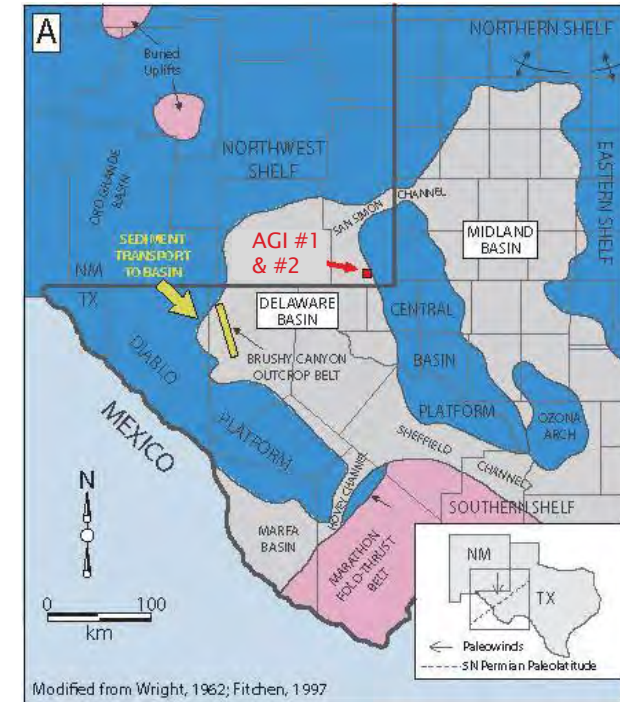
- ▶ The site of the Dark Horse Treatment Facility and AGI wells was constructed on approximately 320 acres, wholly-owned by Pinon Midstream, LLC
- ▶ The AGI wells and all surface equipment are contained within the facility property
- ▶ Independence AGI Well Surface Locations (NAD83):
 - AGI #1 - 32.120020, -103.291015
 - AGI #2 - 32.120835, -103.291025



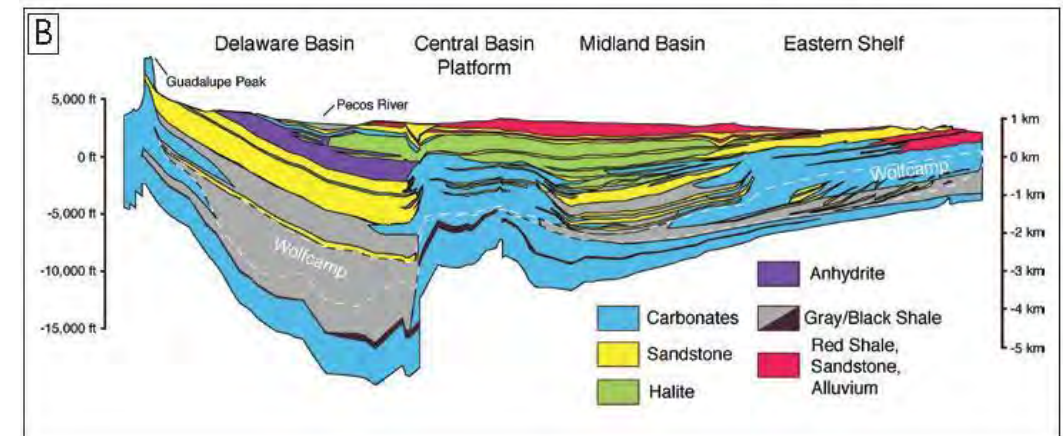
Location map showing Dark Horse Treatment facility and AGI wells in Section 20 (T25S, R36E) approximately six miles west of Jal, New Mexico

GEOLOGY OF THE PROJECT AREA

- ▶ Independence AGI wells #1 and #2 are located on the eastern margin of the Delaware Basin
- ▶ Surface deposits include aeolian and alluvial deposits, with local exposures of Triassic redbeds
- ▶ Approximately 9,000 feet of Permian strata overlie approx. 8,000 feet of older Paleozoic strata (Penn. – Devonian)
- ▶ Devonian Woodford Shale (~300' thick) forms the local caprock that seals the injection reservoir
- ▶ Targeted injection reservoir includes upper Devonian, Wristen, and Fusselman formation geologic strata
- ▶ Local structure includes normal faults, typically oriented parallel to sub-parallel to the northerly trend of the Central Basin Platform



Structural setting (panel A) and general lithologies of the Permian Basin (panel B). Proposed AGI location annotated in Panel A



Generalized stratigraphic correlation chart for the Permian Basin region

SYSTEM	SERIES/ STAGE	NORTHWEST SHELF	CENTRAL BASIN PLATFORM	MIDLAND BASIN & EASTERN SHELF	DELAWARE BASIN	VAL VERDE BASIN
PERMIAN	OCHOAN	DEWEY LAKE RUSTLER SALADO	DEWEY LAKE RUSTLER SALADO	DEWEY LAKE RUSTLER SALADO	DEWEY LAKE RUSTLER SALADO CASTILE	RUSTLER SALADO
	GUADALUPIAN	TANSILL YATES SEVEN RIVERS QUEEN GRAYBURG SAN ANDRES GLORIETA CLEARFORK	TANSILL YATES SEVEN RIVERS QUEEN GRAYBURG SAN ANDRES GLORIETA CLEARFORK	TANSILL YATES SEVEN RIVERS QUEEN GRAYBURG SAN ANDRES SAN ANGELO	★ DELAWARE MT. GROUP BELL CANYON CHERRY CANYON BRUSHY CANYON	TANSILL YATES SEVEN RIVERS QUEEN GRAYBURG SAN ANDRES
	LEONARDIAN	YESO WICHITA ABO	WICHITA	LEONARD SPRABERRY, DEAN	★ BONE SPRING	LEONARD
	WOLFCAMPIAN	WOLFCAMP	WOLFCAMP	WOLFCAMP	★ WOLFCAMP	WOLFCAMP
PENNSYLVANIAN	VIRGILIAN	CISCO	CISCO	CISCO	CISCO	CISCO
	MISSOURIAN	CANYON	CANYON	CANYON	CANYON	CANYON
	DESMOINESIAN	STRAWN	STRAWN	STRAWN	★ STRAWN	STRAWN
	ATOKAN	ATOKA — BEND —	ATOKA — BEND —	ATOKA — BEND —	ATOKA — BEND —	(ABSENT)
	MORROWAN	MORROW	(ABSENT)	(ABSENT ?)	MORROW	(ABSENT)
MISSISSIPPIAN	CHESTERIAN MERAMECIAN OSAGEAN KINDERHOOKIAN	CHESTER MERAMEC OSAGE KINDERHOOK	CHESTER MERAMEC OSAGE "BARNETT"	CHESTER MERAMEC OSAGE "BARNETT"	CHESTER MERAMEC OSAGE "BARNETT"	MERAMEC OSAGE "BARNETT"
	DEVONIAN	WOODFORD DEVONIAN SILURIAN (UNDIFFERENTIATED)	KINDERHOOK WOODFORD DEVONIAN	KINDERHOOK WOODFORD DEVONIAN	KINDERHOOK WOODFORD DEVONIAN	KINDERHOOK WOODFORD DEVONIAN
SILURIAN			SILURIAN SHALE FUSSELMAN	SILURIAN SHALE FUSSELMAN	MIDDLE SILURIAN FUSSELMAN	MIDDLE SILURIAN FUSSELMAN
ORDOVICIAN	UPPER	MONTOYA	MONTOYA	SYLVAN MONTOYA	SYLVAN MONTOYA	SYLVAN MONTOYA
	MIDDLE	SIMPSON	SIMPSON	SIMPSON	SIMPSON	SIMPSON
	LOWER	ELLENBURGER	ELLENBURGER	ELLENBURGER	ELLENBURGER	ELLENBURGER
CAMBRIAN	UPPER	CAMBRIAN	CAMBRIAN	CAMBRIAN	CAMBRIAN	CAMBRIAN
PRECAMBRIAN						

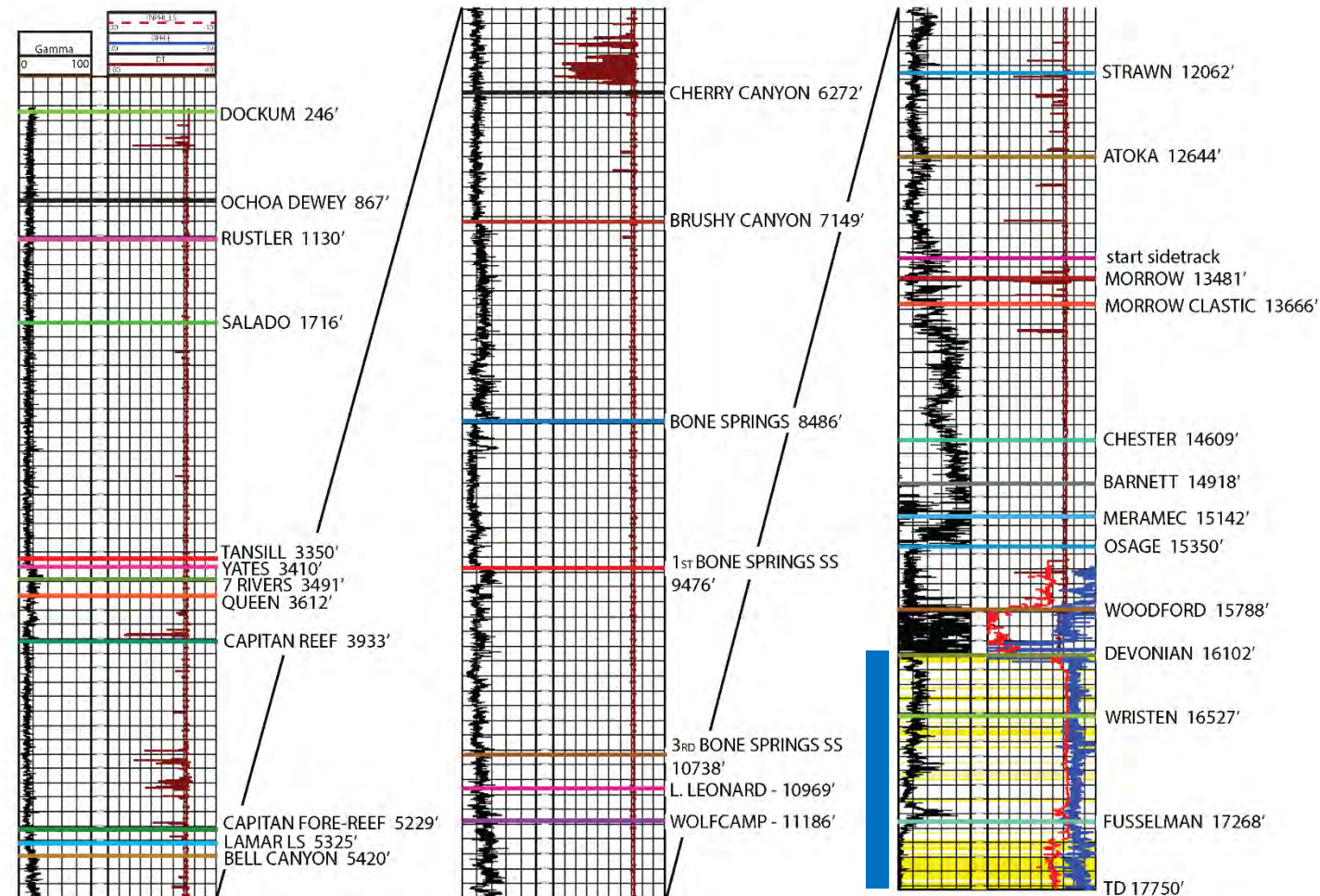
General stratigraphy and producing zones (red stars) in the immediate area of the proposed Independence AGI #1 (modified from Yang and Dorobek, 1995)

SUBSURFACE GEOLOGIC FORMATIONS

Stratigraphy of the subsurface underlying the Independence AGI #1 well is summarized in the table below. The approved Siluro-Devonian injection interval was identified at subsurface depth intervals ranging from 16,102 feet to 17,750 feet.

Formation	MD Depth (feet)	Formation	MD Depth (feet)
Dockum	246	Bone Springs	8486
Ochoa-Dewey	867	Wolfcamp	11186
Rustler	1,130	Strawn	12062
Salado	1716	Atoka	12644
Tansill	3350	Morrow	13481
Yates	3410	Barnett	14918
7 Rivers	3491	Osage	15350
Queen	3612	Woodford	15788
Capitan Reef	3933	Devonian	16102
Bell Canyon	5420	Wristen	16527
Cherry Canyon	6272	Fusselman	17268
Brushy Canyon	7149	Montoya (EST.)	17766

Identified formation tops underlying existing Independence AGI 1 surface location

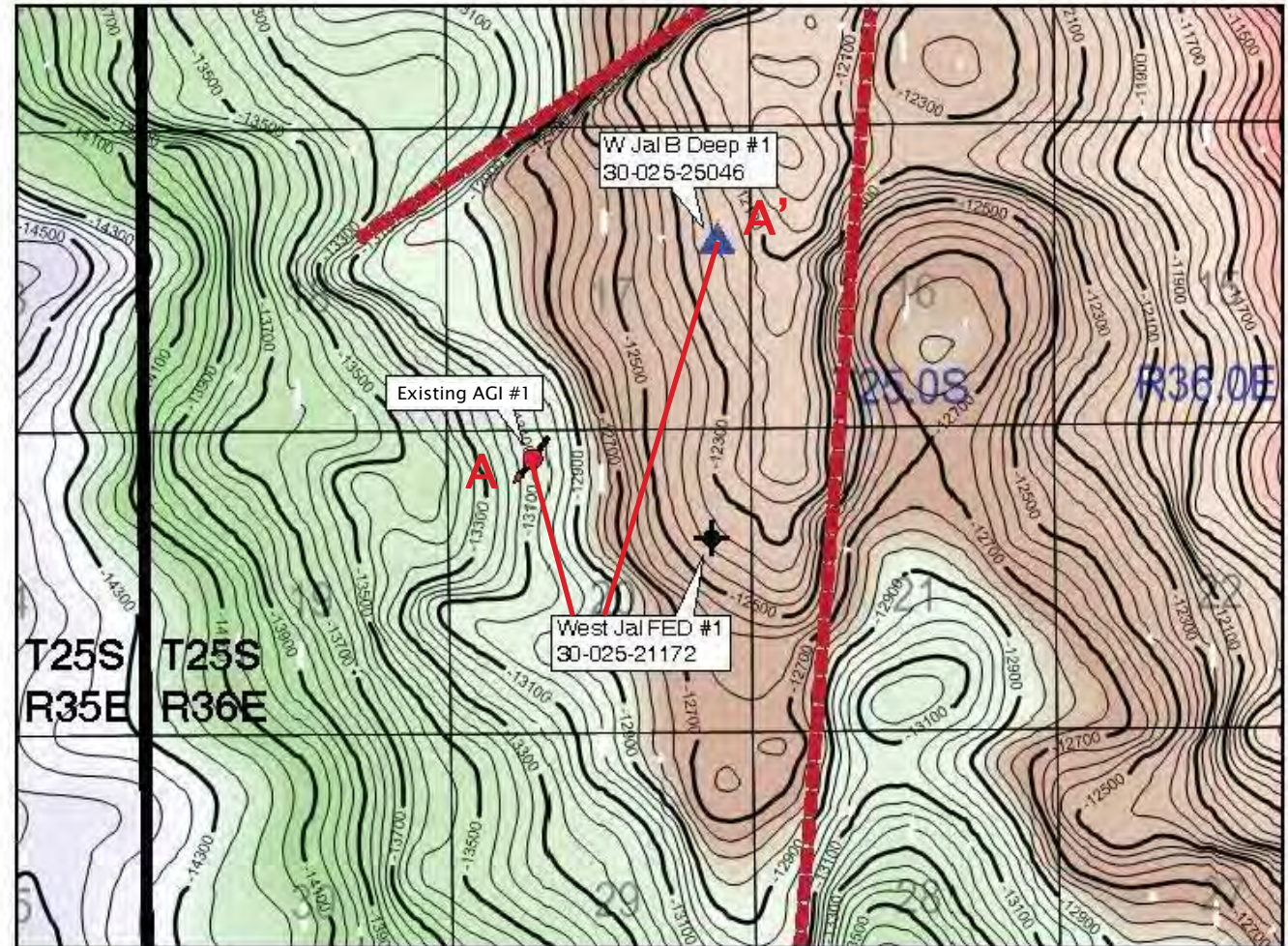


Type log of nearby well (API #30-025-48081) illustrating identified formation tops and approved injection interval

INJECTION INTERVAL

STRUCTURAL GEOLOGY OF THE AREA

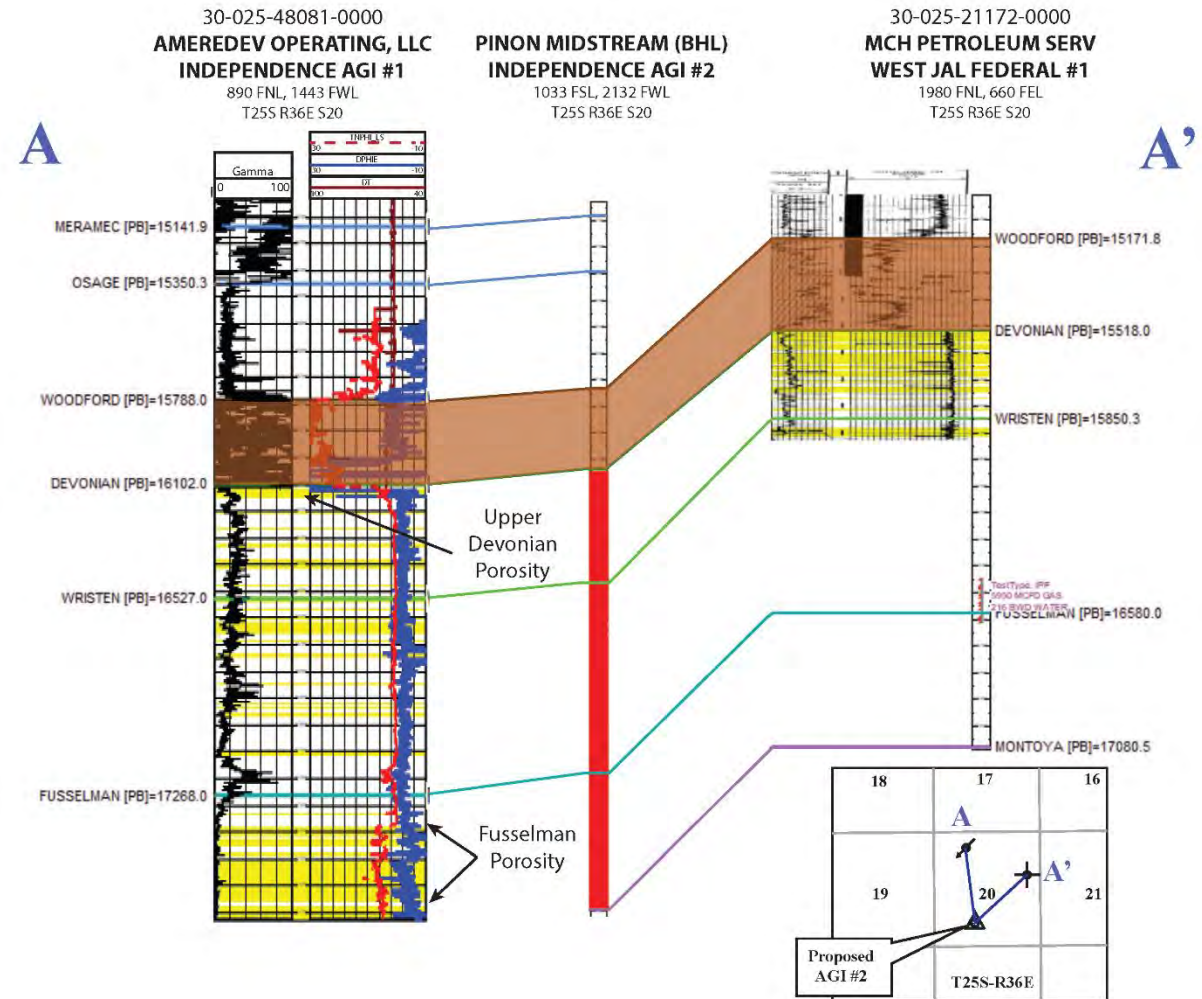
- ▶ Subsea elevations of the top of the Devonian (target reservoir) are shown in the following map (see right)
- ▶ The Independence AGI #1 and #2 wells are located down-dip of a local structural high to the northeast approximately 1 mile from two faults identified in the area
- ▶ Faults identified in review of 3D seismic survey data covering the area of the Independence AGI wells
- ▶ Cross section A-A' is included on the following slide



Interpreted seismic map of subsea elevations of the top of the Devonian (targeted injection reservoir)

STRUCTURAL GEOLOGY OF THE AREA

- ▶ Structural cross section A-A' illustrates porosity profile observed in the existing Independence AGI #1 and nearby offset wells penetrating the proposed injection zone
- ▶ Siluro-Devonian injection interval in the area of Independence AGI wells is overlain by more than 300 feet of dense Woodford Shale and more than 950 feet of low-porosity, low-permeability Mississippian carbonates
- ▶ Injection interval (red bar) found to include porous and permeable geologic intervals within upper Devonian, Wristen, and Fusselman formation strata



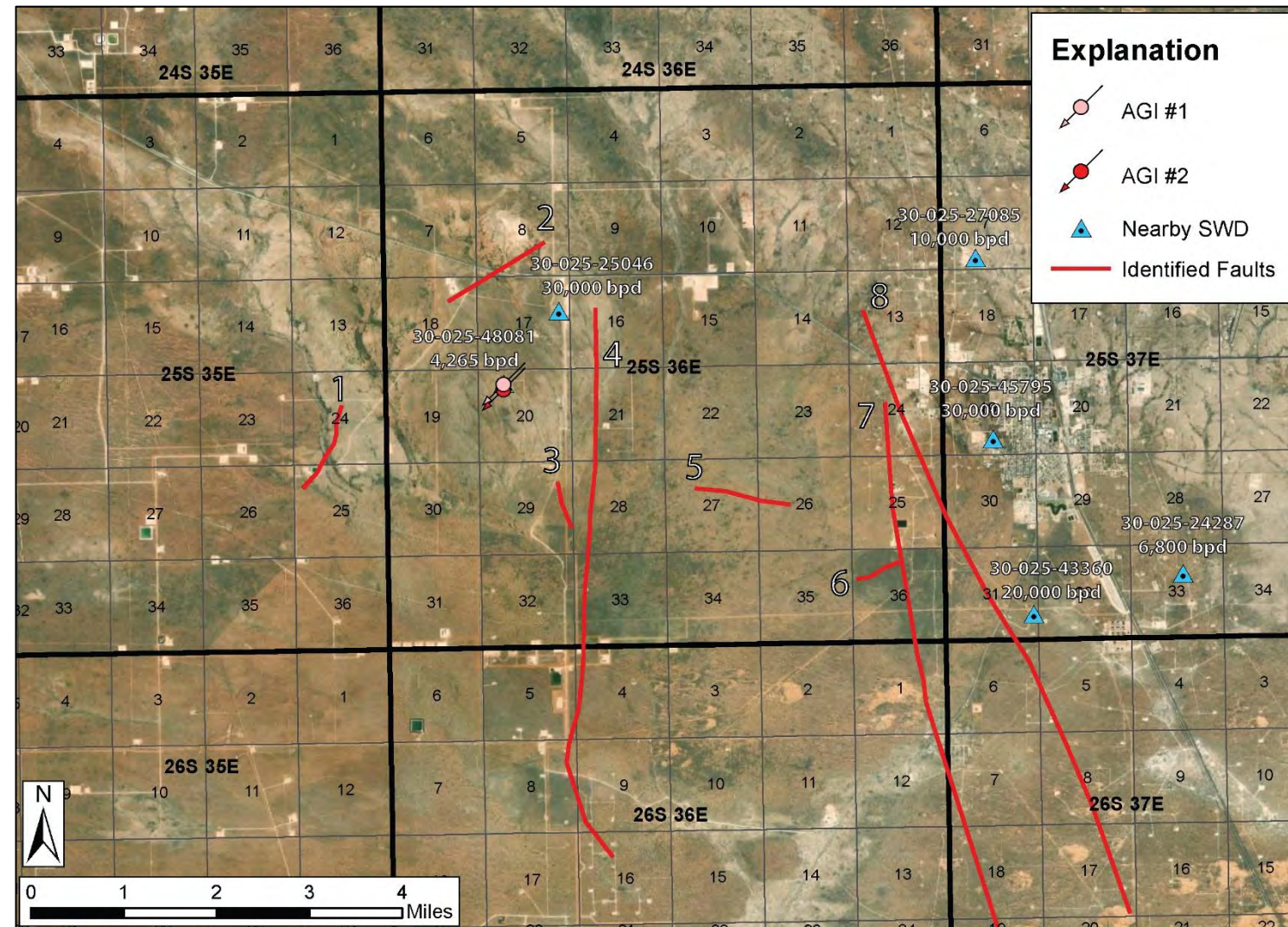
Cross section showing cap rock (Woodford Shale) and porous zones (yellow) identified within the approved injection interval

EVALUATING FEASIBILITY OF AMENDMENT TO DAILY VOLUME LIMITATION

- ▶ To confirm the feasibility of Pinon's request to increase the allowable daily injection volume for the Independence AGI #1 and #2 well system, updated geologic modeling and additional simulation work has been completed.
- ▶ Revised simulation work incorporates additional subsurface information collected during the drilling and completion operations of Independence AGI #1, which is the only nearby Siluro-Devonian well drilled since the time of the original Independence AGI #1 injection permit application.
- ▶ The primary objectives of this additional modeling/simulation work includes:
 1. Update existing Independence AGI #1 geologic model to incorporate injection zone data collected during AGI well drilling and completion operations
 2. Revise geologic model and conduct additional injection simulations, which also consider the new Independence AGI #2, to understand potential impacts, resultant acid gas plume dimensions, and reservoir acid gas concentrations for a case in which Independence AGI #1 and #2 are operated at a maximum daily injection rate of 20 MMSCFD (shared between both injection wells)
 3. Re-evaluation of Fault Slip Probability results to understand the change in the risk for induced seismic events in response to the requested 20 MMSCFD combined daily injection rate

SEISMIC SURVEY REVIEW, NEARBY FAULTS, AND INJECTION WELLS

- ▶ Geolex evaluated and interpreted 3D seismic survey data to identify subsurface faults to be included in reservoir modeling and fault slip probability evaluations
- ▶ Eight (8) faults typically trending N-S parallel to the trend of the Central Basin Platform with smaller features exhibiting semi-perpendicular trends
- ▶ The nearest faults to the AGI location are observed to lie approximately one mile east and north of the proposed well location



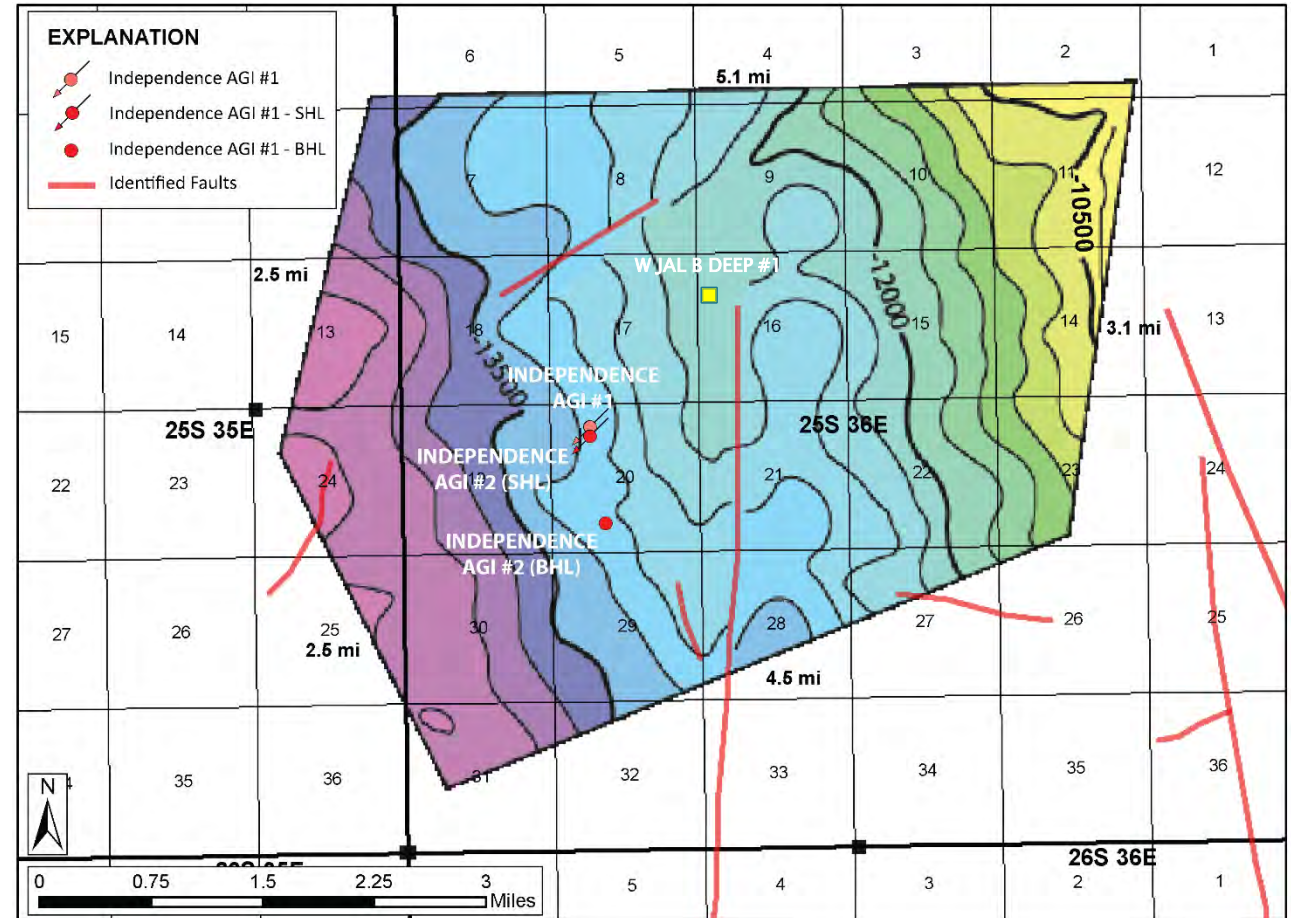
Identified faults in the area of the Independence AGI wells

SIMULATING INJECTION OPERATIONS OF THE PROPOSED AGI WELL

- ▶ To characterize and predict the resultant acid gas plume after 30 years of operation, injection simulations were conducted utilizing Schlumberger modeling and simulation platforms
 - Schlumberger PETREL was utilized to construct and revise a geologic simulation grid representing the subsurface strata
 - Injection simulations were conducted utilizing Schlumberger ECLIPSE and include relevant nearby wells with reasonable potential to affect the resultant AGI plume

GEOLOGIC SIMULATION MODEL

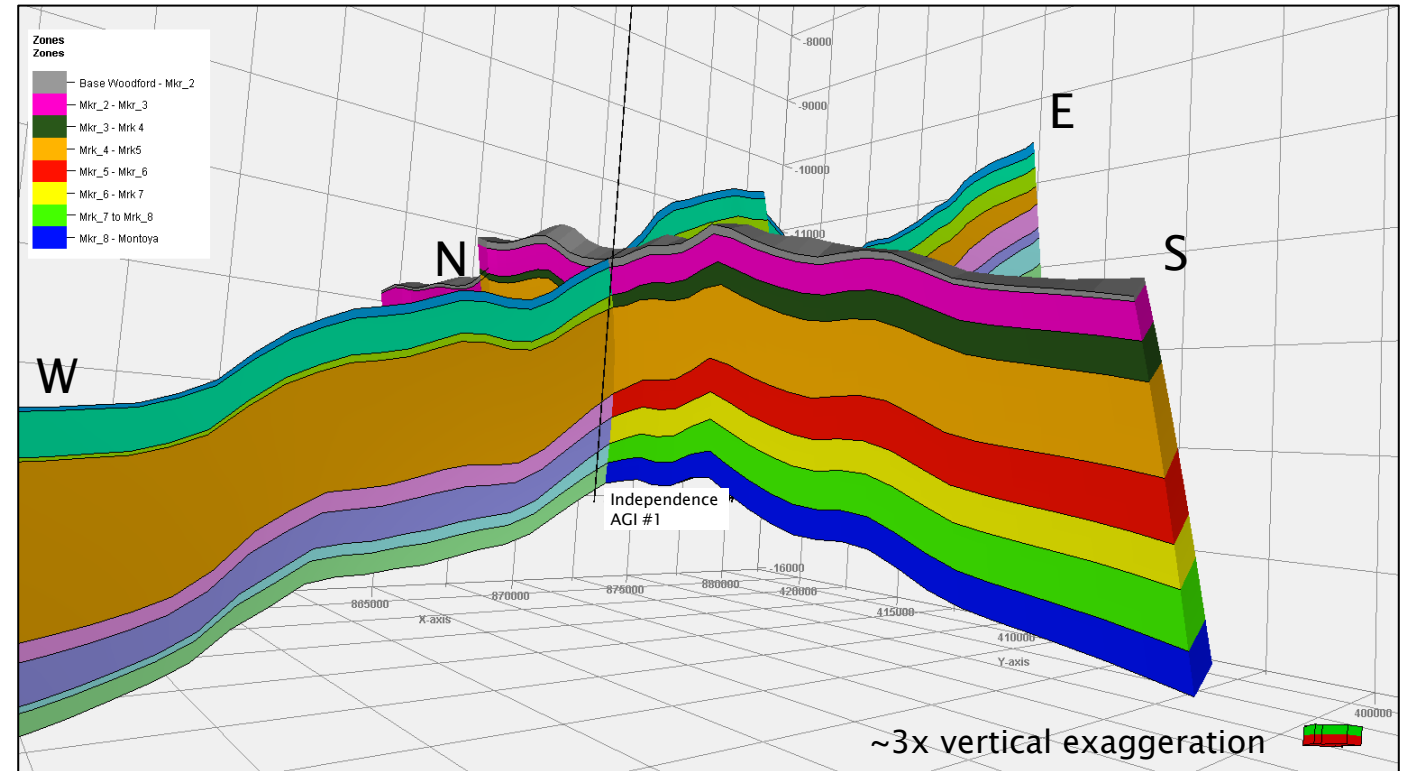
- ▶ To support the request to increase the combined daily injection volume for the Pinon AGI wells, revision of the original AGI #1 geologic model was completed.
- ▶ Simulation grid originally constructed utilizing 3D seismic survey data and limited local well control
- ▶ Model characteristics have since been revised based on geophysical logs and well test data, which were collected during Independence AGI #1 drilling and completion operations.
- ▶ The simulation area covers a total area of approximately 20 square miles in the vicinity of the Piñon gas treatment facility.



Location map illustrating areal extent of geologic simulation grid constructed to simulate operation of the proposed AGI wells and the nearby West Jal B Deep #1 well

GEOLOGIC SIMULATION MODEL

- ▶ Geologic simulation grid is comprised of 292 simulation layers characterizing eight (8) discrete zones identified in review of the injection reservoir
- ▶ Total simulation model includes 923,000 grid cells with areal dimensions of 500 x 500 feet
- ▶ Simulation area covers an area of approximately 20 square miles and includes relevant subsurface features and nearby injection wells



Three-dimensional render of the constructed geologic simulation grid representing eight discrete zone identified in the target reservoir and delineated based on porosity and permeability characteristics

INJECTION RESERVOIR CHARACTERISTICS

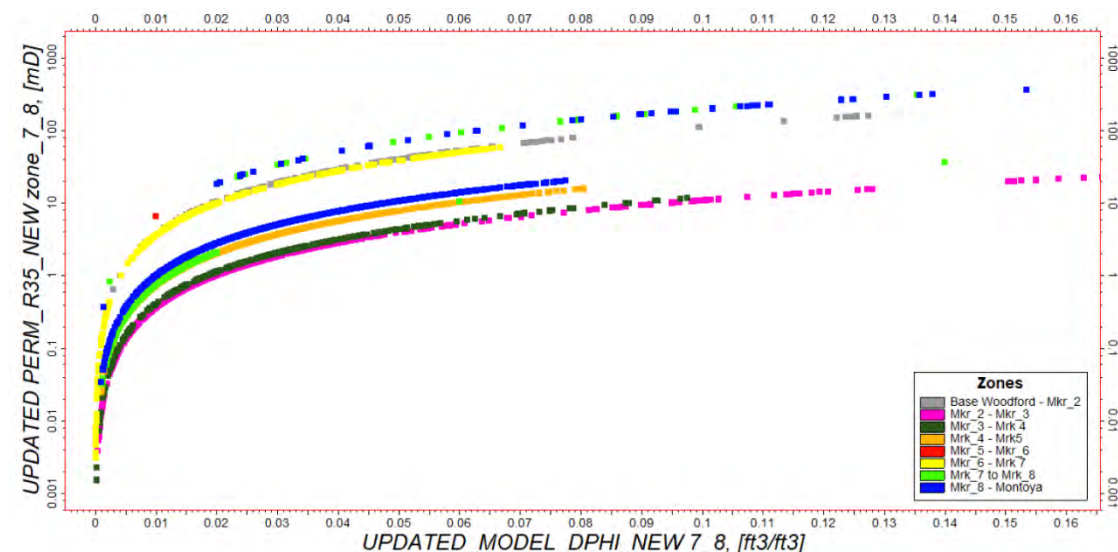
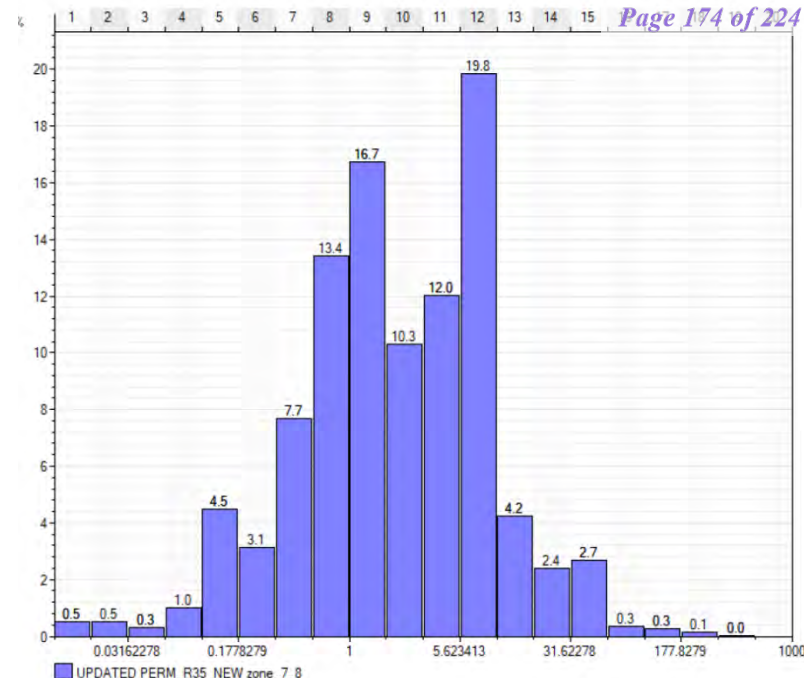
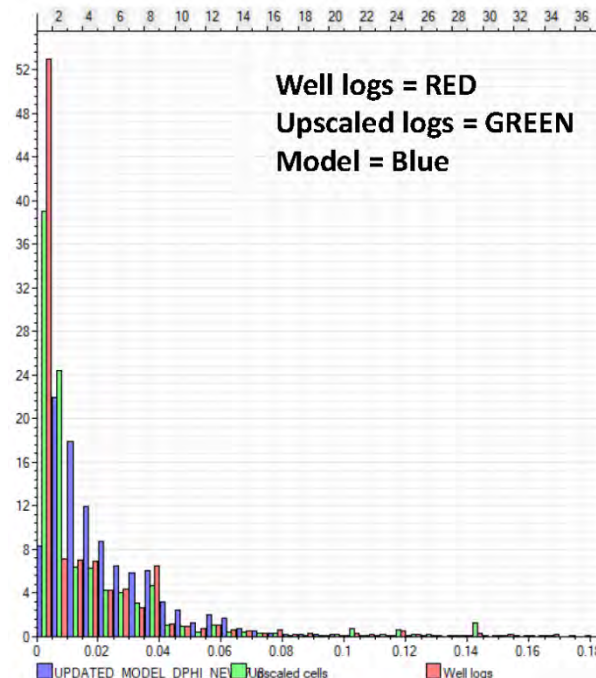
- ▶ Targeted injection reservoir subdivided into eight (8) zones based on interpreted porosity and permeability characteristics
- ▶ Average porosity estimates made for each identified zone based on available well-log data and seismic impedance attribute mapping
- ▶ Average total injection zone porosity of approximately 4.2%
- ▶ Permeability values estimated based on available DST and Independence AGI #1 injection test data and were further refined based on dolomite permeability studies of Lucia et al. (1995)

Zone	Thickness	Φ Type	Φ (Feet)	Avg. Φ	Φ Range	Avg. K (mD)
1	64 ft	SEP + SEF	5.12	8.0%	6-10%	14.3
2	200 ft	FX	4.0	2.0%	1-3%	1.3
3-6	923	Small FX	18.46	2.0%	1-4%	2.1-19
7	262	SEP + SEF	23.58	9.0%	4-14%	3.9
8	214	SEP + SEF	19.26	9.0%	4-14%	11.3

Identified zones within the injection reservoir delineated based on interpreted porosity and permeability characteristics

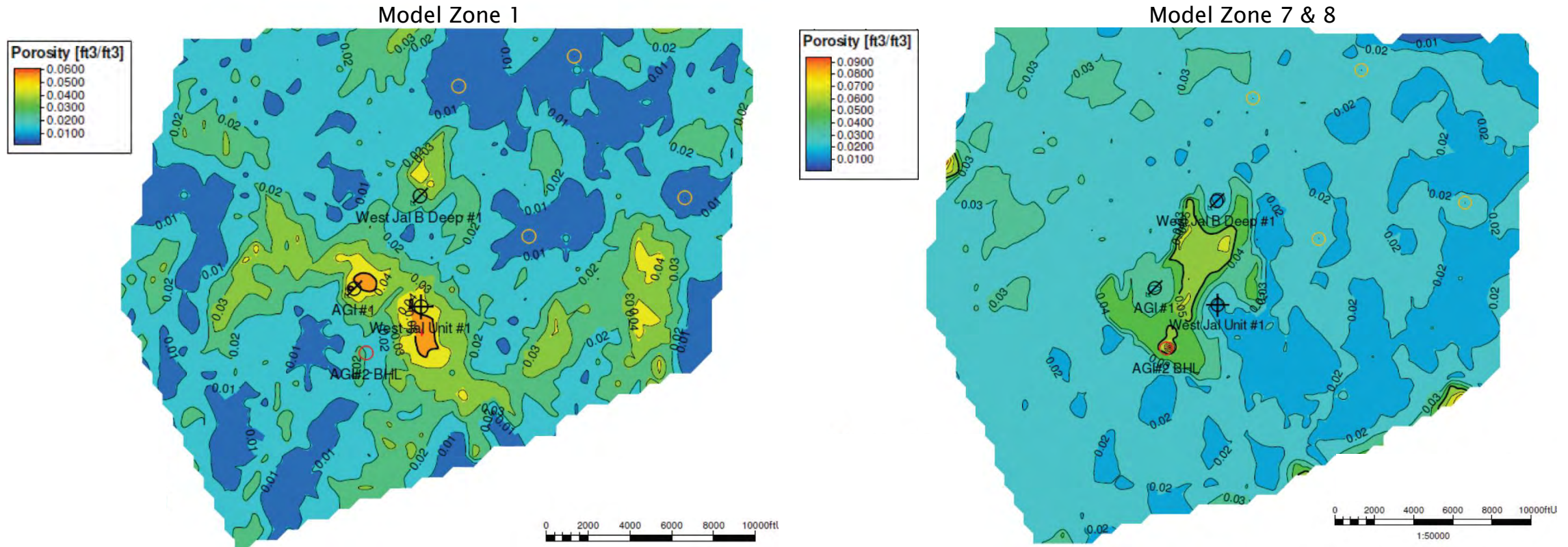
GEOLOGIC MODEL CHARACTERISTICS

- Model porosity distribution generated from available well-log data (n=3), including West Jal B Deep #1, West Jal Unit #1, and the Independence AGI #1
- Reservoir characteristics further refined through detailed analysis of 3D seismic survey data and mapping of seismic impedance attributes
- Model permeability distribution was generated using the Winland R35 method as normal and beta distributions generated no instances of permeability less than 0.1 mD
- As geophysical well log data were available for only three wells in the area of the proposed AGI, 3D seismic survey impedance data were utilized to define key intervals of low-porosity



Permeability (Winland R35) vs. Model DPHI

GEOLOGIC MODEL CHARACTERISTICS



- ▶ Average porosity distribution maps for reservoir Zone 1 and Zone 7/8 are shown above as they are predicted to be primary receptors of acid gas in this area (correlating to upper Devonian and Wristen/Fusselman strata)
- ▶ Synthetic wells implemented to characterize low-porosity zones and are denoted as orange squares (low-porosity zones interpreted from 3D seismic impedance data)

INJECTION SIMULATION PARAMETERS AND CHARACTERISTICS (ECLIPSE)

- ▶ Simulation considers injection of a mixed acid gas stream of approximately 70% CO₂ and 30% H₂S for a total of 30 years
- ▶ NIST REFPROP utilized to determine gas properties for injection simulations (comparable to AQUALibrium™ software)
- ▶ Proposed AGI and SWD operated at maximum anticipated injection rate continuously throughout simulation
- ▶ Simulation assumes reservoir is 100% saturated with brine in hydrostatic equilibrium upon commencement of injection simulation
- ▶ Boundary of simulation area is closed, and faults are simulated as barriers to flow (non-transmissive)

INJECTION CASE STUDIES

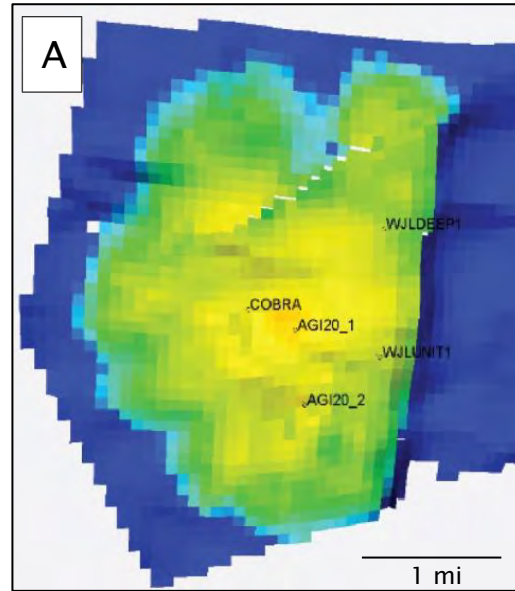
CASE #	INDEPENDENCE AGI #1 INJECTION RATE	INDEPENDENCE AGI #2 INJECTION RATE	WEST JAL B DEEP INJ. RATE
1	10 MMSCFD (4,100 bpd)	10 MMSCFD (4,100 bpd)	0
2	10 MMSCFD (4,100 bpd)	10 MMSCFD (4,100 bpd)	30,000 bpd

Summary of case simulations and associated injection well operating parameters

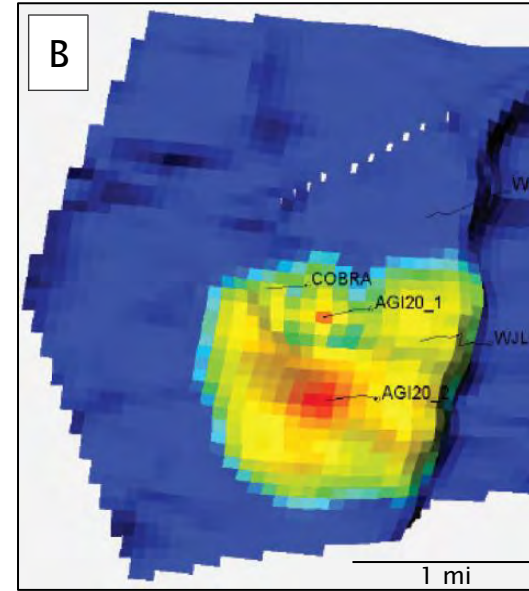
- ▶ In total, two additional case simulations were conducted to evaluate the impacts of AGI #1 and #2 injection at a combined daily rate of 20 MMSCFD (8,200 bpd)
- ▶ Case simulations consider the resultant AGI plume when the West Jal B Deep #1 well is operating at 30,000 barrels per day, and when no injection operations occur via this well

CASE 1 – SIMULATION RESULTS

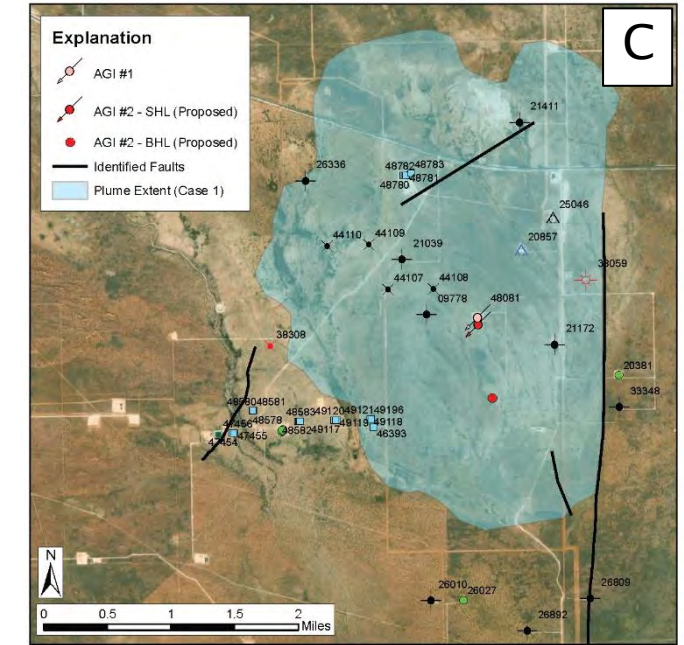
- Maximum lateral dispersion distance of acid gas is predicted to be 2.3 miles from the AGI well location (Panel C)
- Gas saturation distribution maps (panels A and B) demonstrate that outer margin of the plume is generally characterized by lower acid gas concentrations ($\leq 25\%$) with higher saturation level (30–50%) near the AGI well locations
- Cross-sectional views of the injection reservoir (panel D) demonstrate Zones 1, 5, 7, and 8 are predicted to receive the greatest volume of acid gas



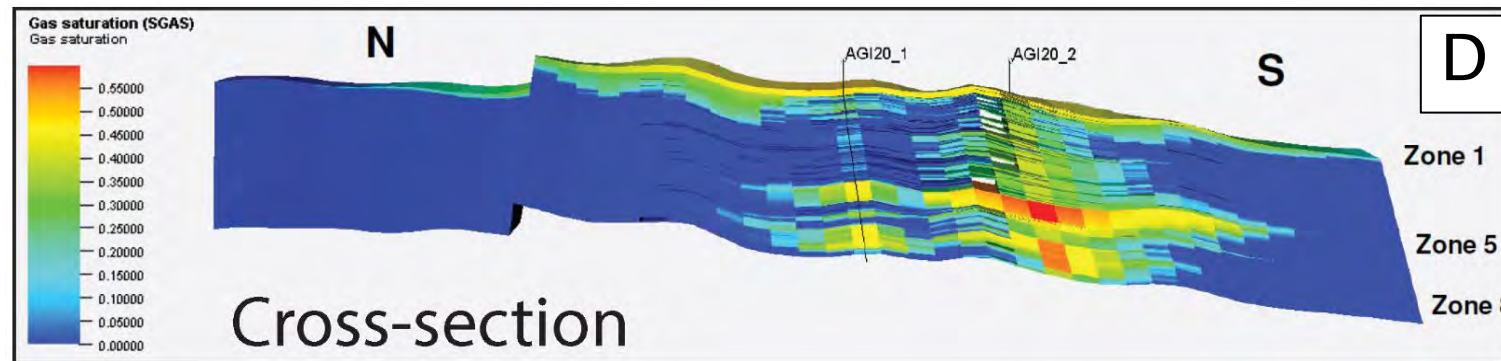
Zone 1 Gas saturation map



Zone 5 Gas saturation map



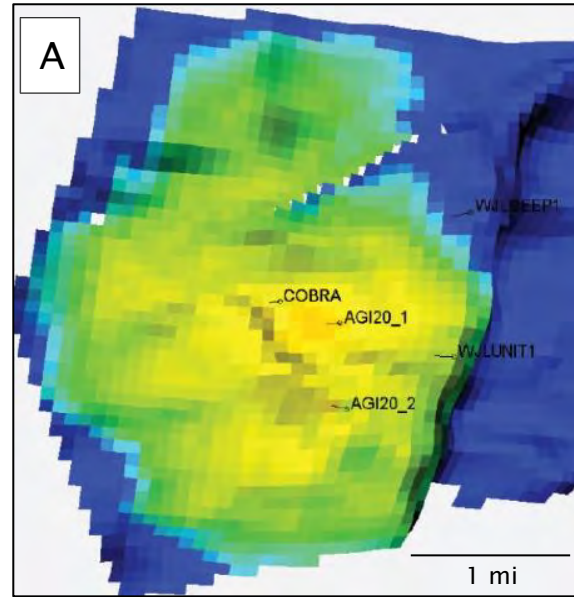
Total potential acid gas plume footprint (all zones) including diffuse areas <0.1 saturation



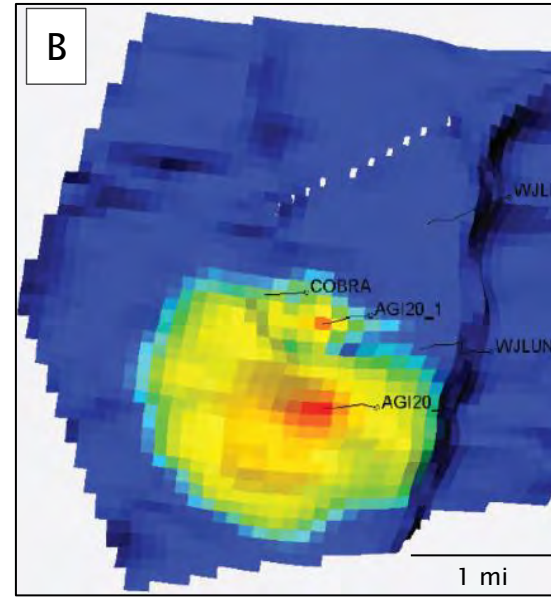
North-South cross-sectional view of resultant plume

CASE 2 – SIMULATION RESULTS

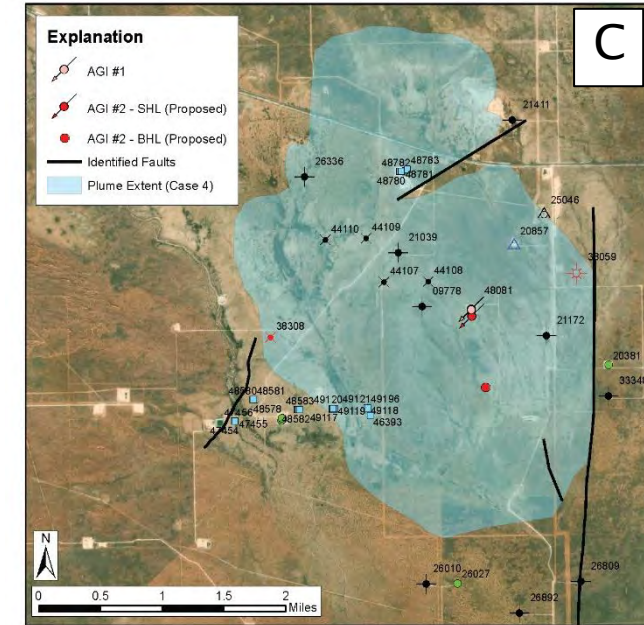
- Maximum lateral dispersion distance of acid gas is predicted to be 2.43 miles from the AGI well location (Panel C)
- Gas saturation distribution maps (panels A and B) demonstrate that outer margin of the plume is generally characterized by lower acid gas concentrations ($\leq 25\%$) with higher saturation level (30–50%) near the AGI well locations
- Cross-sectional views of the injection reservoir (panel D) demonstrate Zones 1, 5, 7, and 8 are predicted to receive the greatest volume of acid gas



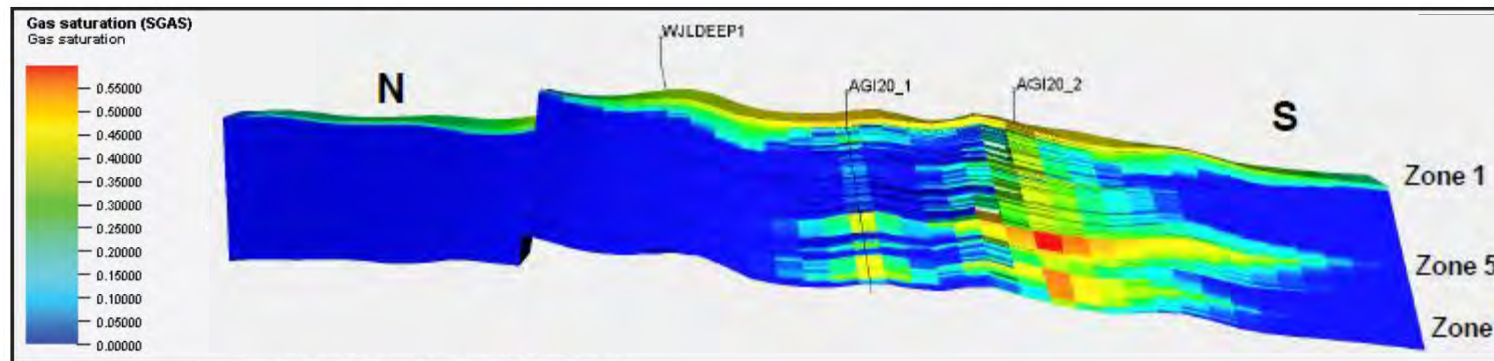
Zone 1 Gas saturation map



Zone 5 Gas saturation map



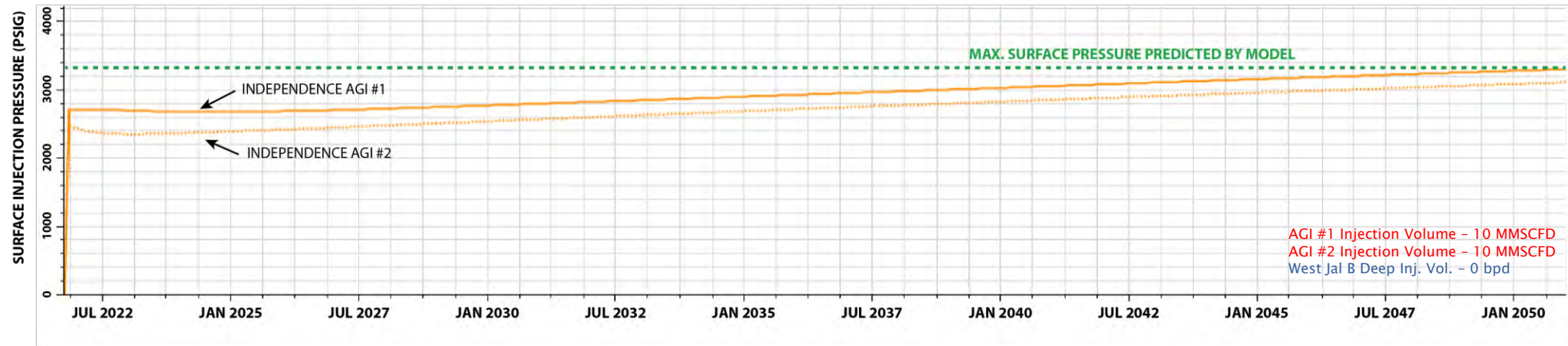
Total potential acid gas plume footprint (all zones) including diffuse areas <0.1 saturation



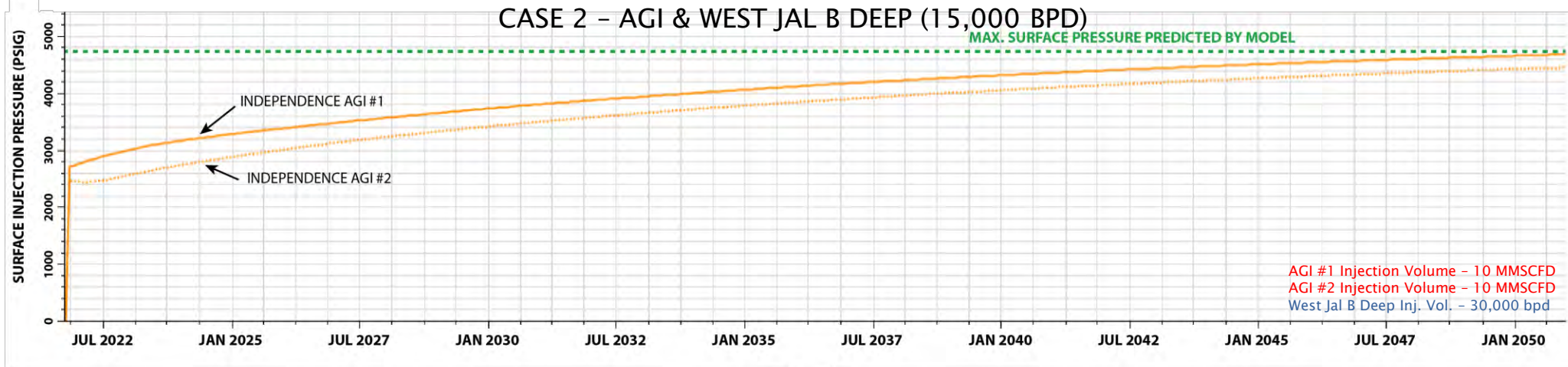
North-South cross-sectional view of resultant plume

CASE 1 & 2 – INJECTION RATE AND PRESSURE

CASE 1 – EXCLUDING SWD WELLS



CASE 2 – AGI & WEST JAL B DEEP (15,000 BPD)



- ▶ In both case simulations 1 and 2 (including/excluding West Jal B Deep #1), the reservoir is fully capable of accommodating the proposed acid gas volumes without exceeding the approved MAOP of 4,779 psi and 5,005 psi, respectively.

DISTRIBUTION OF INJECTATE BY ZONE

CASE SIMULATION 1 – EXCLUDING SWD

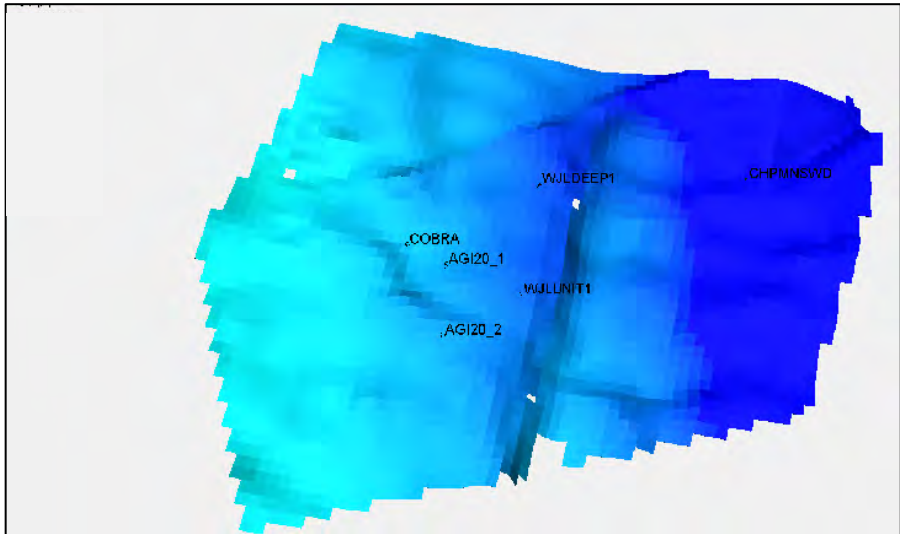
ZONE #	CUMULATIVE INJECTION (MMSCF)	CUMULATIVE INJECTION (MMBLS)	TOTAL PERCENT
1	97,125	39.82	45.5
2	977	0.40	0.5
3	589	0.24	0.3
4	10,832	4.44	5.1
5	45,664	18.72	21.4
6	13,377	5.48	6.3
7	8,305	3.41	3.9
8	36,810	15.09	17.2
TOTAL	213,680	87.61	100

CASE SIMULATION 2 – INCLUDING SWD

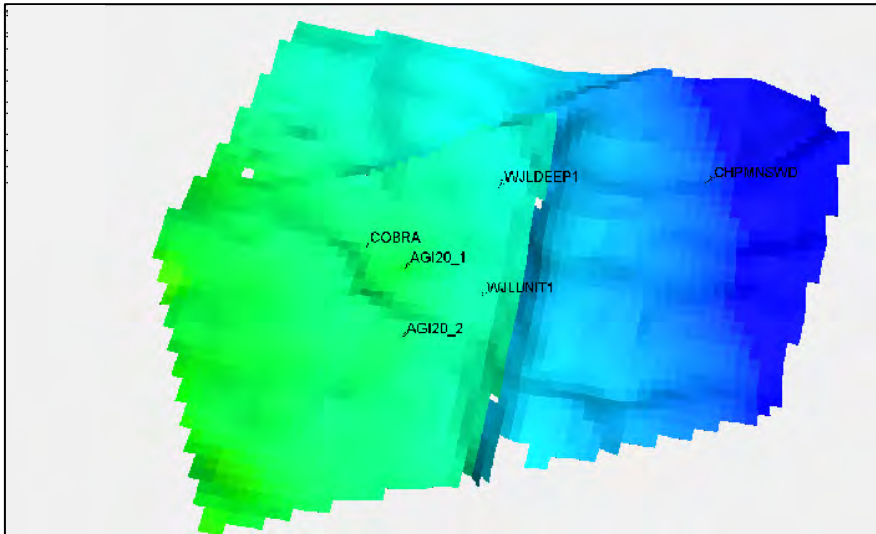
ZONE #	CUMULATIVE INJECTION (MMSCF)	CUMULATIVE INJECTION (MMBLS)	TOTAL PERCENT
1	97,115	39	44.5
2	820	0.34	0.4
3	453	0.19	0.2
4	8,257	3.39	3.9
5	39,840	16.33	18.6
6	12,152	4.98	5.7
7	9,354	3.84	4.4
8	47,671	19.55	22.3
TOTAL	213,680	87.61	100

- ▶ Only minimal change in the distribution of acid gas by zone is observed between cases, indicating operation of the West Jal B Deep #1 primarily results in a deflection of the injected acid gas
- ▶ Pressure influence from West Jal B Deep #1 results in only minimal increase in acid gas received by minor zones identified within the Devonian reservoir
- ▶ Distribution of acid gas, as predicted by the injection simulations are in agreement with our experience operating Devonian AGI wells, in that upper Devonian and Wristen/Fusselman strata commonly accept the greatest proportions of acid gas

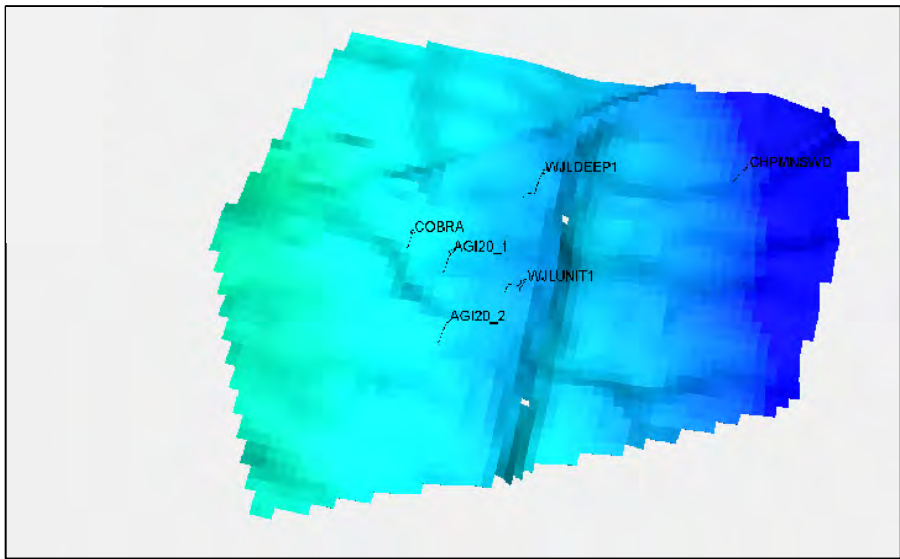
CASE 1 – RESULTANT PRESSURE



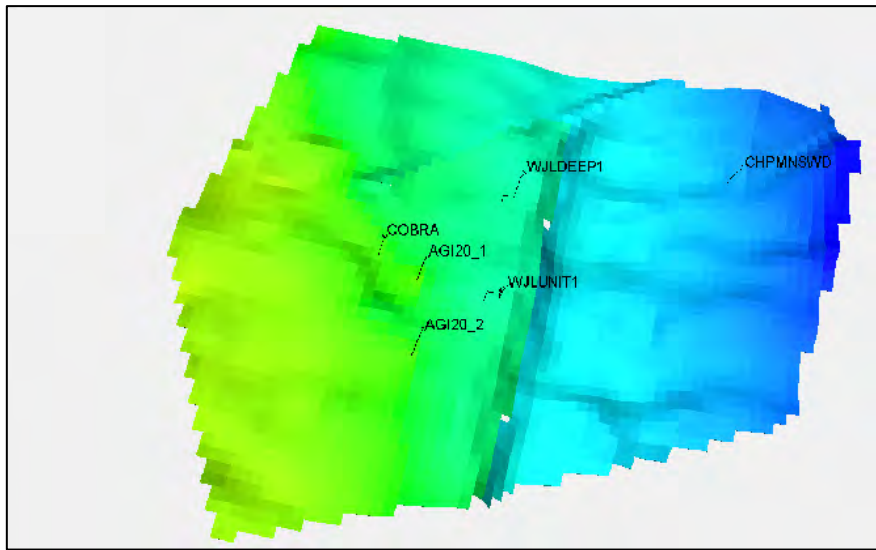
Zone 1 Initial Pressure Conditions



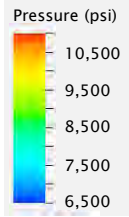
Zone 1 - End of Simulation



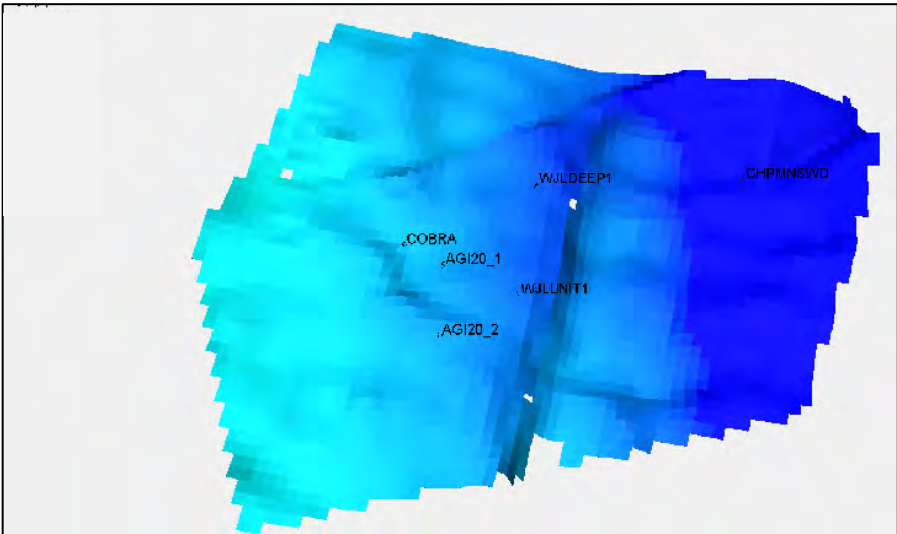
Zone 5 Initial Pressure Conditions



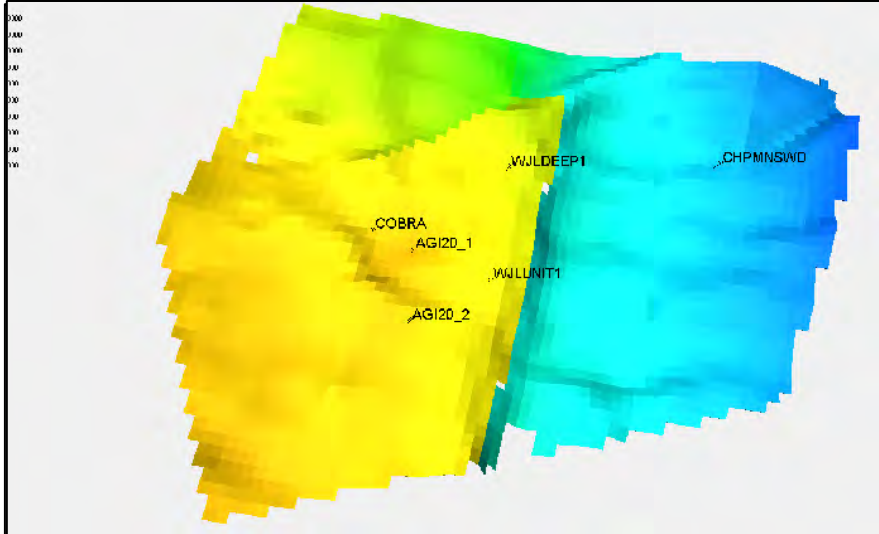
Zone 5 - End of Simulation



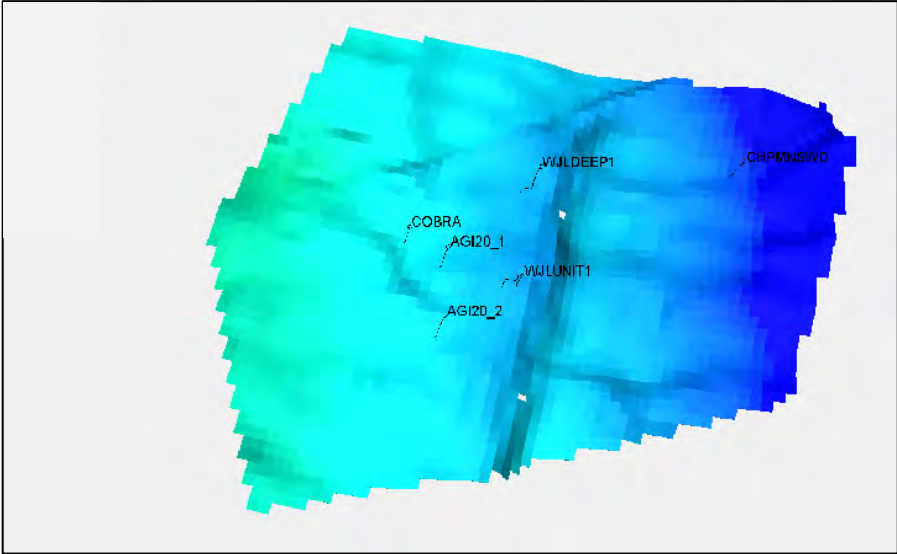
CASE 2 – RESULTANT PRESSURE



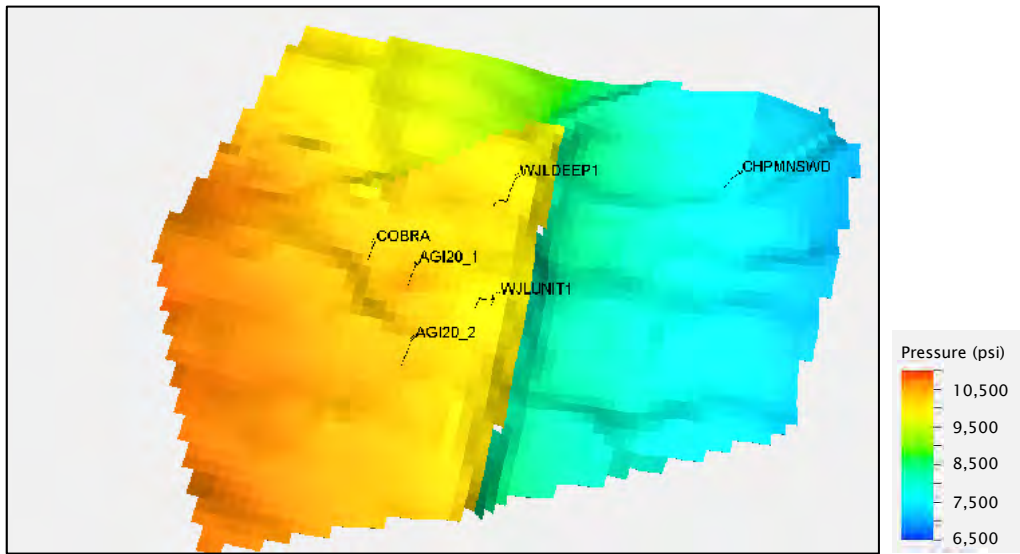
Zone 1 Initial Pressure Conditions



Zone 1 – End of Simulation



Zone 5 Initial Pressure Conditions



Zone 5 – End of Simulation

SUMMARY – INJECTION SIMULATIONS

- ▶ In summary, the Siluro–Devonian reservoir in this location is fully capable of receiving and sequestering the target 20 MMSCF per day (8,200 bpd) of acid gas as proposed in Piñon’s application.
- ▶ Injection simulations to characterize the resultant acid gas plume after 30 years of operation were conducted utilizing Schlumberger PETREL and ECLIPSE modeling and simulation platforms.
- ▶ All wells included were simulated at their maximum anticipated daily injection rates, which provides a conservative estimate of the impact of injection operations on the Siluro–Devonian injection reservoir.
- ▶ Two additional case studies have been simulated to estimate the resultant acid gas plume when nearby SWD were operating continuously and coincident with the AGI and when the SWD were offline.
- ▶ In all cases, the target 20 MMSCF (8,200 bbls) per day can successfully be maintained for 30 years without exceeding the requested MAOP of 4,779 psig and 5,005 psig for AGI’s #1 and #2, even in simulations where nearby SWD are unable to maintain injection for the full 30–year period.
- ▶ When the West Jal B Deep SWD is offline (Case #1), injection simulations predict a maximum lateral dispersion distance of 2.3 miles from the AGI wellbore, however, outer margins of the plume are characterized by diffuse concentrations (saturation less than 0.25).

SUMMARY – INJECTION SIMULATIONS

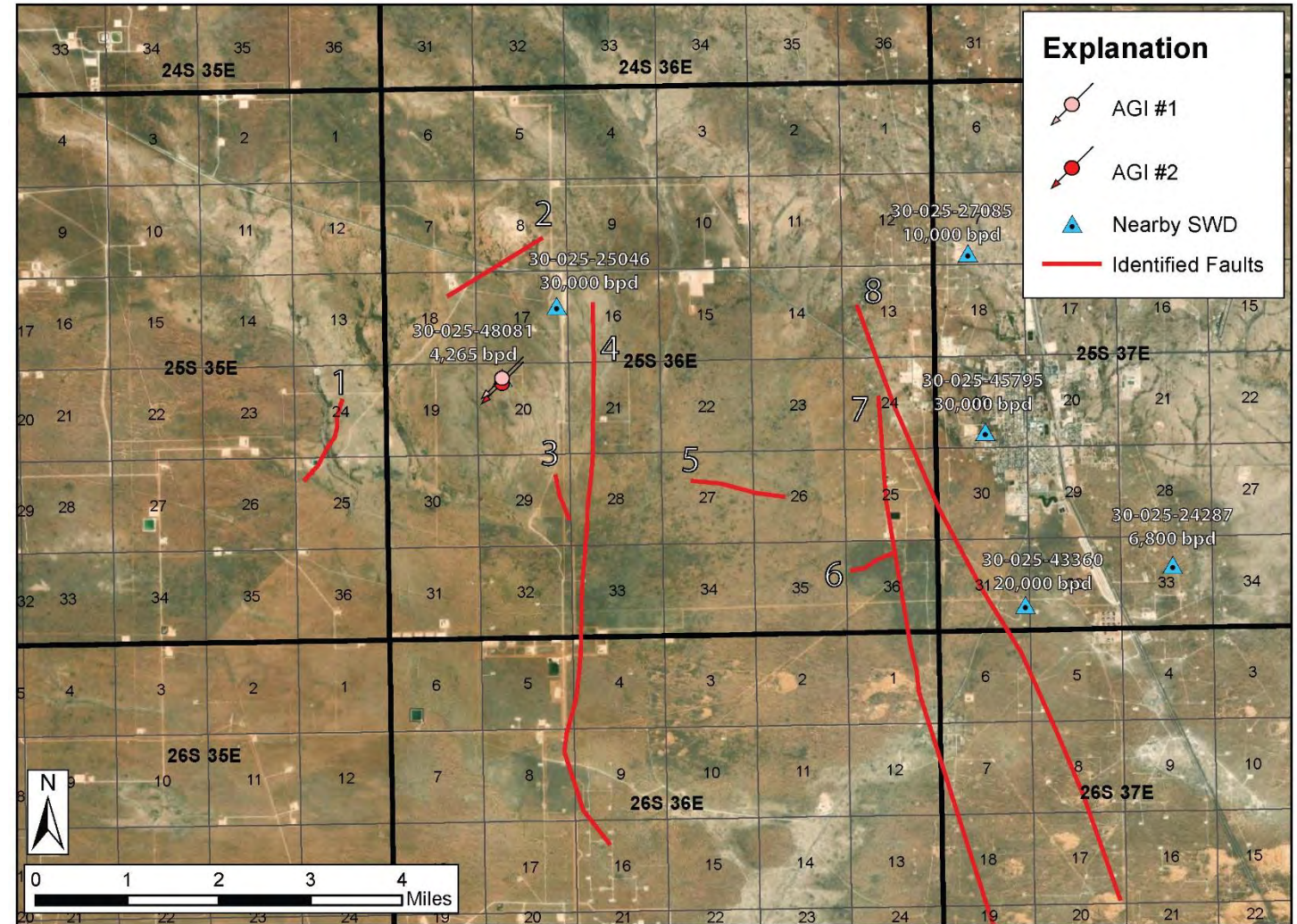
- ▶ When West Jal B Deep SWD #1 injects coincident with the proposed AGI at 30,000 bpd (Cases 2), pressure influence from West Jal B Deep inhibits northeast preferential dispersion and deflects plume approximately N-NW and S. The maximum dispersion distance of the AGI plume is 2.43 miles
- ▶ In all cases, Zone 1 and Zone 5 are predicted by the simulations to be the primary receivers of acid gas, which is in agreement with injection patterns observed in other active Siluro-Devonian AGI wells
- ▶ At the proposed rate (20 MMSCFD), which will be shared by the AGI #1 and #2 wells, no additional wells penetrating the injection interval are encountered by the resultant acid gas plume

EVALUATING FAULT SLIP POTENTIAL

- ▶ To evaluate the potential for induced–seismic events in response to injected fluids, Geolex conducted an induced–seismicity risk assessment in the area of the Independence AGI wells
- ▶ Components of Risk Assessment:
 1. Review and interpretation of licensed 3D seismic survey data to identify subsurface features in the area of the proposed AGI well (courtesy of Ameredev)
 2. Fault–slip probability modeling of a seven–well, 30–year acid gas injection scenario that simulates operation of the proposed well and nearby SWD operations and predicts the associated risk of induced–seismic events (Assessment completed utilizing Stanford FSP model)

SEISMIC SURVEY REVIEW AND NEARBY INJECTION WELLS

- ▶ Geolex evaluated and interpreted 3D seismic survey data to identify subsurface faults to be included in the FSP model evaluation
- ▶ Eight (8) faults typically trending N-S parallel to the trend of the Central Basin Platform with smaller features exhibiting semi-perpendicular trends
- ▶ The nearest faults to the AGI location are observed to lie approximately one mile east and north of the proposed well location



Identified faults in the area of the Independence AGI wells

MODEL INPUT PARAMETERS

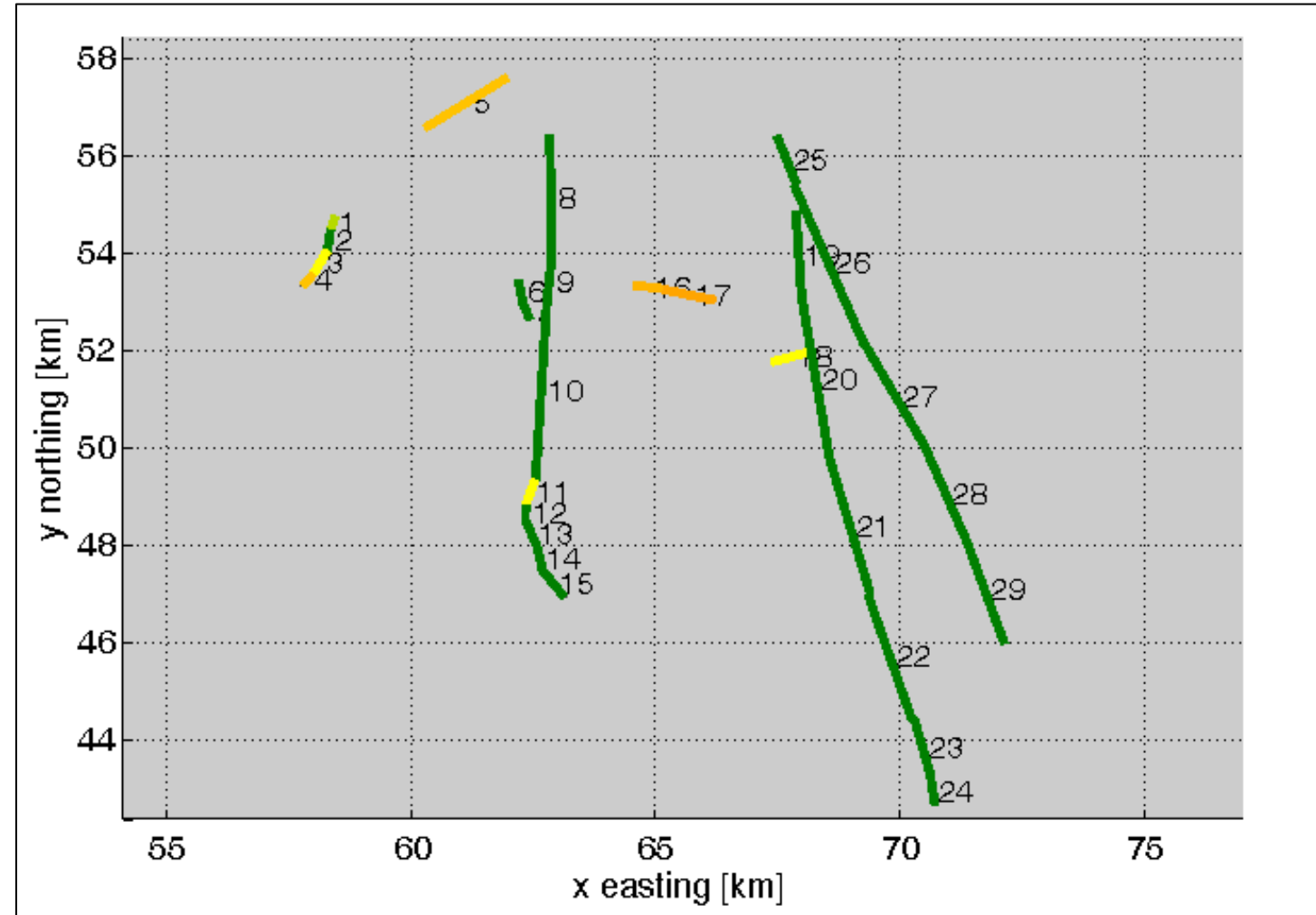
- ▶ The FSP model first utilizes input parameters describing local stress conditions, fault geometry, and orientation to determine the required pressure increase to induce motion along each simulated feature
- ▶ Faults in the vicinity of the proposed Independence AGI wells were observed to be steeply dipping (near vertical) typically trending approx. N-S and NW-SE

Modeled Parameter	Input Value	Variability (+/-)	UOM	Source
<i>Stress</i>				
Vertical Stress Gradient	1.05	0.105	psig/ft	Nearby well estimate
Max Horizontal Stress Direction	N75E	5	Deg	Lund Snee & Zoback, 2018
Reference Depth	17000		ft	Nearby well evaluation
Initial Res. Pressure Gradient	0.43	0.043	psig/ft	Lund Snee & Zoback, 2018
				Nearby well evaluation
A _φ Parameter	0.6	0.06	-	Lund Snee & Zoback, 2018
Reference Friction Coefficient (μ)	0.6	0.06	-	Standard value
<i>Hydrologic</i>				
Aquifer Thickness	1500	0	ft	Nearby well evaluation
Porosity	3.5	0.35	%	Nearby well evaluation
Permeability	20	2	mD	Nearby well evaluation
<i>Material Properties</i>				
Density (Water)	1040	40	Kg/m ³	Standard value
Dynamic Viscosity (Water)	0.0008	0.0001	Pa.s	Standard value
Fluid Compressibility (Water)	3.6 x 10 ⁻¹⁰	0	Pa ⁻¹	Standard value
Rock Compressibility	1.08 x 10 ⁻⁹	0	Pa ⁻¹	Standard value
<i>Acid Gas Properties @ 7,370 psig & 228 °F</i>				
Density	821.80	-	kg/m ³	AQUALibrium™
Dynamic Viscosity	8.067 x 10 ⁻⁵	-	Pa.s	AQUALibrium™

Input parameters and source material for FSP model simulations

DEFINING FAULTS FOR FSP SIMULATION

- ▶ To accurately characterize their non-linear expression, the eight (8) identified fault features were subdivided into 29 fault segments to be represented in fault-slip simulations
- ▶ Initial step by the FSP simulation is to estimate the change in pressure conditions required to induce slip based on local stress characteristics and orientation of subsurface features



Subdivision of eight identified faults into 29 fault segments for simulation

REQUIRED CONDITIONS TO INDUCE SLIP

- ▶ As shown in the Table, pore pressure increases required to induce slip, as predicted by the FSP model, range from approximately 1,080 to 6,930 psi
- ▶ Faults generally striking closer to orientation of maximum horizontal stress direction (N75E) are predicted to require less pore-pressure increase to induce slip than those features striking approx. N-NW
- ▶ Segments exhibiting lowest predicted pressure increase to induce slip correspond to faults 1, 2, 5, and 6 (as shown in the previous slide 37)

Segment #	Δ PP Required to Slip (PSI)	Segment #	Δ PP Required to Slip (PSI)
1	3137	16	1101
2	4357	17	1085
3	1786	18	1554
4	1201	19	6012
5	1197	20	6680
6	6869	21	6914
7	6298	22	6758
8	5645	23	6931
9	4610	24	6590
10	5005	25	6508
11	2709	26	6327
12	5302	27	5455
13	6339	28	6305
14	6899	29	6684
15	4197		

Model-estimated pore-pressure increase required to induced slip along each fault segment included in FSP model simulations

INJECTION WELLS IN THE VICINITY OF THE PROPOSED AGI

- ▶ Geolex simulated seven (7) Devonian injection wells within approx. 8 miles in FSP simulations to predict the associated risk for injection-induced fault slip
- ▶ To provide a conservative estimate of risk, all included SWD and the Independence AGI wells were operated at their maximum anticipated daily injection rate, as recorded in their respective C-108 applications
- ▶ Daily injection volumes range from approximately 4,200 to 30,000 barrels per day with the contribution of the AGI consisting of <8% of total volume injected in the area
- ▶ Model limitations require simulation of the AGI utilizing injectate characteristics of produced water, which provides additional assurance that a conservative estimate of risk is produced as water exhibits greater viscosity and is significantly less compressible than acid gas

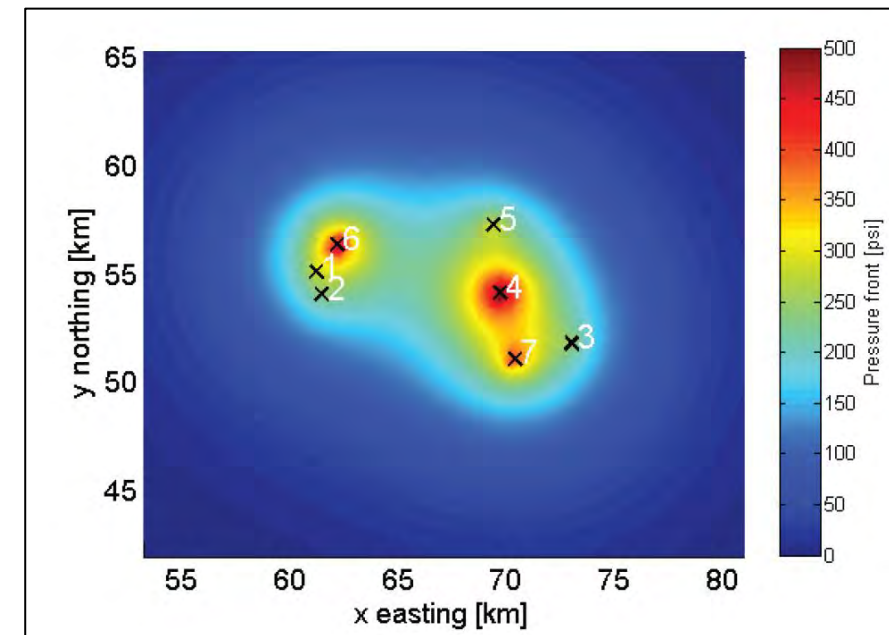
INJECTION WELLS INCLUDED IN FSP MODEL SIMULATIONS

Well #	API	Well Name	Volume (bbls/day)	Start (year)	End (year)
1	3002548081	Independence AGI #1	4265	2020	2052
2	3002549974	Independence AGI #2	4265	2022	2052
3	3002524287	Crosby Deep #2	6800	2010	2052
4	3002545795	Sholes Deep SWD #1	30000	2020	2052
5	3002527085	Jal N. Ranch SWD #1	10000*	2017	2052
6	3002525046	West Jal B Deep #1	30000	2015	2052
7	3002543360	Kimberly SWD #1	30000	2015	2052

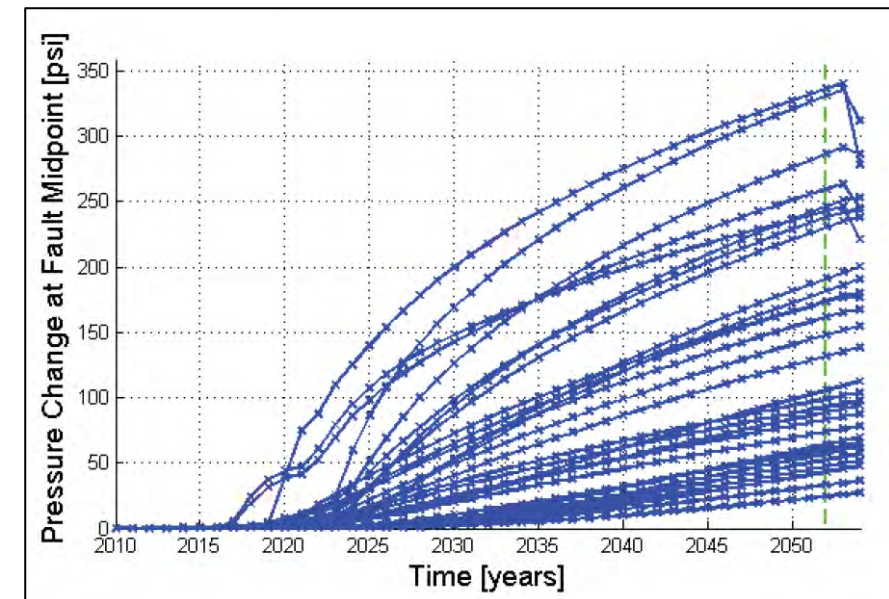
*NMOCD records include no information regarding the maximum anticipated injection volume and estimates were made based on reported injection volume data

FSP INJECTION SIMULATION RESULTS

- ▶ After 40+ years of simulated injection, model-estimated pressure increase experienced at fault midpoints ranges from approximately 25–334 psi
- ▶ Predicted pressure changes resulting from the simulated injection scenario fall sufficiently short of the model-determined pressure required to induce slip along included faults
- ▶ Model-determined actual pressure increase experienced at fault midpoints range from less than 1% to 21% of pressure increase required to induce slip



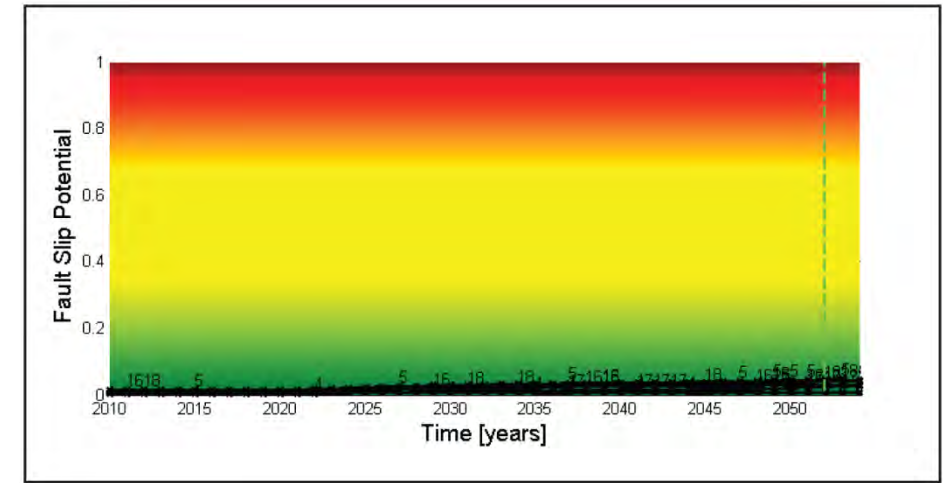
Resultant pressure conditions after 30 years of AGI operations



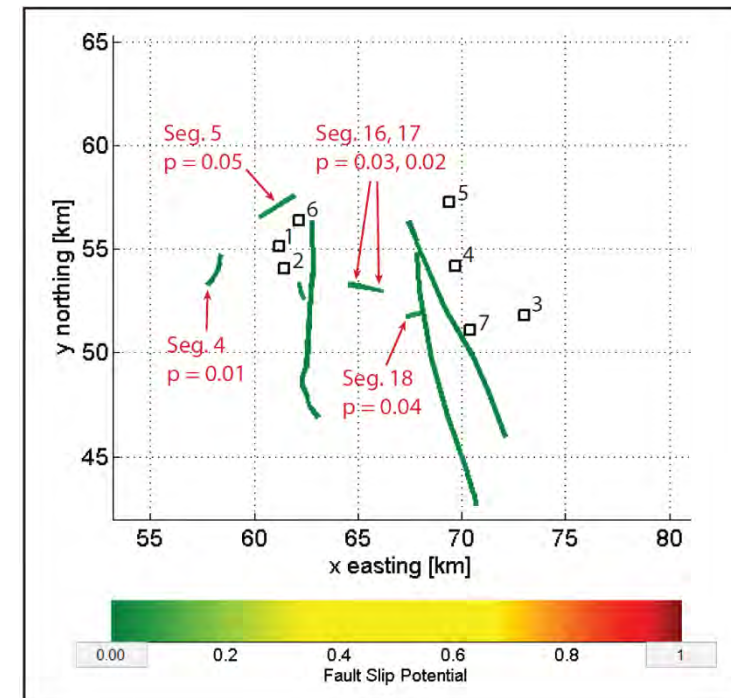
Pressure change experienced at each fault segment throughout the simulated injection scenario

FSP SIMULATION RESULTS

- ▶ In response to the simulated injection scenario, the FSP model predicts non-zero slip probability estimates for five (5) fault segments
- ▶ Slip probability estimates for these fault segments range from 0.01 to 0.05
- ▶ The majority of fault segments (24) included are predicted by the FSP model to have **no potential** for injection-induced slip (probability = 0.00)



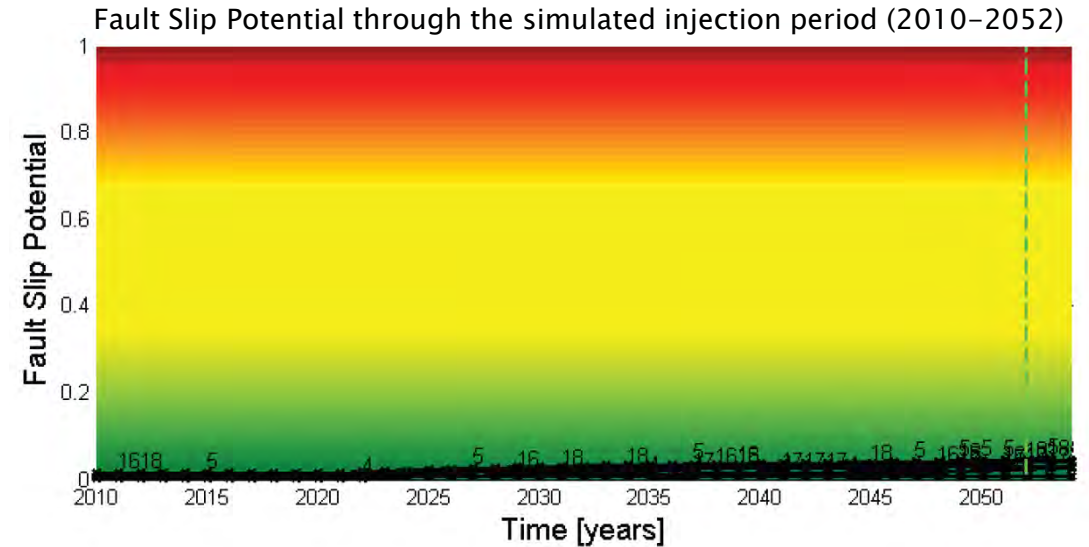
Fault Slip Potential through the simulated injection period (2010–2052)



FSP fault map annotated with non-zero model predictions of slip probability (red)

FSP SIMULATION RESULTS

- ▶ Generally, identified faults are not predicted to be at significant risk for injection-induced slip in response to the seven-well injection scenario presented
- ▶ Subsequent simulations conducted that exclude the injection volume contributions of Independence AGI #1 and #2 demonstrate the minimal impact the AGI wells will exert on the reservoir (shown in Table to right)
- ▶ As simulated, the proposed AGI can be operated without contributing significantly to the total risk of injection-induced slip, which under these operating conditions remains minimal throughout the total simulation period



Segment #	Predicted Δ PP (PSI)	Δ PP Required to Slip (PSI)	Probability of Slip	Probability (No AGI)
4	83	1201	0.01	0.01
5	253	1197	0.05	0.05
16	192	1101	0.03	0.03
17	199	1085	0.02	0.02
18	234	1554	0.04	0.04

Tabulated summary of FSP model results for fault segments predicted by the to have non-zero estimates of fault-slip probability

AMENDMENT APPLICATION SUMMARY

- ▶ Piñon Midstream, LLC is requesting amendment of the existing NMOCC Order (No. 21455-A) to increase the daily injection volume limitation up to 20 MMSCFD for the Independence AGI #1 and #2 wells.
- ▶ Both AGI wells have been authorized for injection into the Siluro-Devonian geologic interval, after satisfying all requirements of the NMOCD technical and administrative review process. The Independence AGI #1 well was authorized by NMOCC, on November 4, 2020, with the issuance of Order R-21455-A.
- ▶ Independence AGI #2 was authorized for injection on March 31, 2022 (Order SWD-2464), however, NMOCD determined that the requested increase to the daily injection volume limitation could not be authorized via the administrative process.
- ▶ In evaluating the feasibility of injection operations at the proposed combined 20 MMSCF daily limitation, Piñon conducted additional work to revise the original geologic modeling and conduct additional simulations to understand the behavior of the acid gas plume at the higher injection rates proposed.

AMENDMENT APPLICATION SUMMARY

- ▶ Petrel and Eclipse modeling and simulation results estimate that the acid gas plume, after 30 years of injection at the maximum daily rate, would extend a maximum 2.3 to 2.43 miles from the AGI wells.
- ▶ Furthermore, injection simulation results confirm that operations of the wells, at a shared rate of 20 MMSCFD, can be maintained throughout the entire 30-year simulation period without exceeding the NMOCD-approved surface injection pressures for each well.
- ▶ Fault Slip Probability simulations were also revised to assess the induced seismicity risk associated with the proposed increased injection rate.
- ▶ Results of additional fault slip probability simulations demonstrate that the AGI wells can be operated at a combined daily volume of 20 MMSCFD without producing significant risk of injection-induced seismic events or contributing significantly to the total risk of induced slip.

PIÑON'S REQUEST FROM THE NMOCC

- ▶ Piñon seeks approval to operate the existing Independence AGI #1 well and the Independence AGI #2 well, which is on schedule to be in service by November 4, 2022, at a combined and shared daily injection rate of 20 MMSCF per day (approximately 8,200 bbls per day at reservoir conditions).
- ▶ The proposed 20 MMSCFD injection volume limitation is equivalent to approximately 8,200 bbls/day at reservoir pressure and temperature conditions, which is significantly less than daily volumes of typical SWD wells. For comparison, the current approved injection volume (12 MMSCFD) is equivalent to approximately 4,900 bbls/day at reservoir temperature and pressure conditions.
- ▶ Operation of the wells will occur in accordance with the currently approved surface injection pressure limitation of 4,779 psig for the Independence AGI #1 well and 5,005 psig for the Independence AGI #2 well. No increase to the allowable surface injection pressure is being requested.
- ▶ As proposed, the Independence AGI wells will increase the treating capability of sour gas assets in the area, will prevent waste and significantly reduce the potential for flaring (on-site and in producing fields), and will prevent the atmospheric release of production-related CO₂.
- ▶ As demonstrated by revised modeling and simulation work, the AGI wells can be operated at the proposed combined rate of 20 MMSCFD without an elevated risk of producing induced-seismic events and can dispose of the required volumes of acid gas safely and effectively.

EXHIBIT FOR NOTICES

Sample Notice Letter

Scanned Copies of Certified Mail Receipts (White Cards),
Proofs of Delivery (Green Cards), and Tracking Summary

Proof of FedEx Notice Delivery to NGL South Ranch, Inc.

Additional Follow-Up Notices via E-Mail Correspondence

BEFORE THE OIL CONSERVATION COMMISSION

Santa Fe, New Mexico

Exhibit No. F

Submitted by: **Piñon Midstream, LLC**

Hearing Date: September 8, 2022

Case No. 22977



Alberto A. Gutiérrez, C.P.G.

August 31, 2022

NGL South Ranch, Inc.
6120 South Yale Avenue, Suite 805
Tulsa, OK 74136

VIA FEDERAL EXPRESS

RE: CASE NUMBER 22977: APPLICATION OF PIÑON MIDSTREAM, LLC TO AMEND
COMMISSION ORDER R-21455-A TO INCREASE THE MAXIMUM DAILY INJECTION
RATES FOR THE INDEPENDENCE AGI #1 AND #2 WELLS, LEA COUNTY, NEW MEXICO

To Whom it May Concern:

Please find the enclosed notification and application of Piñon Midstream, LLC, which has been filed with the New Mexico Oil Commission and has been set for hearing on September 8, 2022. This correspondence is a follow-up to a previous attempt to provide NGL South Ranch, Inc. with notification and all relevant materials relating to the application. The original notification and of application materials were mailed on August 16, 2022.

Enclosed you will find a complete copy of the application and all supporting materials included in the previous August 16, 2022, correspondence, which was attempted via U.S.P.S Certified Mail.

If you have any questions concerning this application, you may contact Alberto A. Gutiérrez, C.P.G. or David White, P.G. at Geolex, Inc.®; 500 Marquette Avenue NW, Suite 1350; Albuquerque, New Mexico; (505) 842-8000.

Sincerely,
Geolex, Inc.®

A handwritten signature in black ink, appearing to read "David A. White".

David A. White, P.G.
Vice President – Consultant to Piñon

Enclosure: August 16, 2022 Notice Letter to NGL South Ranch, Inc.
Attachment A – Application to Amend Commission Order
Attachment B – Independence AGI #2 C-108 Injection Permit Application

P:\22-028 Pinon Hearing Spt\Notifications (July 2022)\Copies of all Notice Letters\8_31_2022 Second NGL Notice Letter (AUG 2022).docx

phone: 505-842-8000
fax: 505-842-7380

500 Marquette Avenue NW, Suite 1350
Albuquerque, New Mexico 87102

email: aag@geolex.com
web: www.geolex.com



Alberto A. Gutiérrez, C.P.G.

August 16, 2022

NGL South Ranch, Inc.
3773 Cherry Creek North Dr., Suite 1000
Denver, CO 80209

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: CASE NUMBER 22977: APPLICATION OF PIÑON MIDSTREAM, LLC TO AMEND
COMMISSION ORDER R-21455-A TO INCREASE THE MAXIMUM DAILY INJECTION
RATES FOR THE INDEPENDENCE AGI #1 AND #2 WELLS, LEA COUNTY, NEW MEXICO

To Whom it May Concern:

This letter is to advise you that Piñon Midstream, LLC (Piñon) has filed the enclosed application (Attachment A) with the New Mexico Oil Conservation Commission (NMOCC) seeking amendment to the daily injection volume limitation for the Independence AGI #1 and #2 wells, which were previously authorized for injection through issuance of NMOCC Order 21455-A and Order SWD-2464, respectively. Piñon is requesting approval to increase the maximum daily injection volume, shared between both Independence AGI wells, to a maximum of 20 million standard cubic feet per day (MMSCFD), as described and presented in the Independence AGI #2 Form C-108 injection permit application (Attachment B).

A hearing with the NMOCC is expected on September 8, 2022, at 9:00 a.m., and the application has been assigned Case Number 22977. During the COVID-19 Public Health Emergency, state buildings are closed to the public and hearings will be conducted remotely. To participate in the electronic hearing, please see the instructions posted on the NMOCC Hearings website: <https://www.emnrd.nm.gov/ocd/hearing-info/>.

You are not required to attend this hearing, but as a party of interest that may be affected by this application, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from challenging the matter at a later date. Parties appearing in cases are required by Division Rule 19.15.4.13.B to file a Pre-hearing Statement four (4) business days in advance of a scheduled hearing. This statement must be filed at the Division's Santa Fe office at 1220 South St. Frances Drive; Santa Fe, New Mexico 87505 and should include the names of the parties and their attorneys; a concise statement of the case; the names of all witnesses the party will call to testify at the hearing; the approximate time the party will need to present its case; and identification of any procedural matters that are to be resolved prior to the hearing.

If you have any questions concerning this application, you may contact Alberto A. Gutiérrez, C.P.G. or David White, P.G. at Geolex, Inc.®; 500 Marquette Avenue NW, Suite 1350; Albuquerque, New Mexico; (505) 842-8000.

Sincerely,
Geolex, Inc.®

A handwritten signature in black ink, appearing to read "David A. White", written over a horizontal line.

David A. White, P.G.
Vice President – Consultant to Piñon

Enclosure: Attachment A – Application to Amend Commission Order
Attachment B – Independence AGI #2 C-108 Injection Permit Application

phone: 505-842-8000
fax: 505-842-7380

500 Marquette Avenue NW, Suite 1350
Albuquerque, New Mexico 87102

email: aag@geolex.com
web: www.geolex.com

ATTACHMENT A

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION COMMISSION**

**APPLICATION OF PIÑON MIDSTREAM,
LLC TO AMEND COMMISSION ORDER NO.
R-21455-A TO INCREASE THE MAXIMUM
DAILY INJECTION RATES FOR THE
INDEPENDENCE AGI #1 AND #2 WELLS,
LEA COUNTY, NEW MEXICO.**

**CASE NO. _____
COMMISSION ORDER NO. R-21455-A**

APPLICATION

Piñon Midstream, LLC ("Piñon") (OGRID 330718) through its undersigned attorneys, hereby makes application to the Oil Conservation Commission pursuant to the provisions of NMSA 1978, Sections 70-2-11 and 70-2-12, to amend Commission Order No. R-21455-A to increase the maximum daily injection rate of treated acid gas for disposal through the Independence AGI #1 and #2 wells from 12 MMSCFD to 20 MMSCFD. In support of this application, Piñon states as follows:

1. The Independence AGI #1 well (API No. 30-025-48081) is an existing vertical well with a surface and bottom hole location approximately 829 feet from the north line and 1,443 feet from the west line (Unit C) of Section 20, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico. It was originally approved by the Commission as an injection well for disposal of treated acid gas ("TAG") under Commission Order No. R-21455-A in Case No. 21381.
2. Commission Order No. R-21455-A authorized a maximum daily injection rate of 12 MMSCFD into the target injection interval within the Devonian and Silurian formations from a depth of approximately 16,230 to 17,900 feet deep. The order also required a second acid gas

injection well (“AGI”) to be approved and capable of receiving volumes of TAG “equal to or greater than the volumes approved for injection into” the Independence AGI #1. *See* Order No. R-21455-A, ¶ 18.

3. Under the terms of Order No. R-21455-A, Piñon timely filed an administrative C-108 application for a redundant injection well, the Independence AGI #2 well (API No. 30-025-49974), which will be a deviated well with a surface location approximately 1,180 feet from the north line and 1,578 feet from the west line (Unit C) and a bottom hole location approximately 1,033 feet from the south line and 2,132 feet from the west line (Unit L) in Section 20, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico. It will inject into the same target reservoir as the AGI #1 well, from approximately 16,080 to 17,683 feet deep within the Devonian and Silurian formations.

4. In the C-108 application, Piñon sought authority to inject up to 20 MMSCFD between the Independence AGI #1 and #2 wells.

5. Order No. R-21455-A authorized the Division to approve an administrative C-108 application for the required second well “that is capable of receiving volumes of TAG that is equal to or greater than the volumes approved for injection into the Independence AGI Well No. 1.” *See* Order No. R-21455-A, ¶ 18. The Division issued its approval through administrative order SWD-2462 on March 31, 2022.

6. Notwithstanding the fact that Order No. R-21455-A authorized the Division to administratively approve a second well “that is capable of receiving volumes of TAG that is equal to or greater than the volumes approved for injection into the Independence AGI Well No. 1” and to increase the maximum operating surface injection pressure for the Independence AGI #2, it has taken the position that the Order limits the combined maximum rate of injection for

both AGI wells to 12 MMSCFD and that the Division does not have authority to administratively increase the maximum daily injection rate to 20 MMSCFD. SWD-2462 states that “Under Order No. R-21455-A, a combined total of 12 MMSCFD for both Independence AGI wells injecting concurrently” is the maximum daily injection rate.

7. The Independence AGI wells serve Piñon’s Dark Horse Gas Treatment Plant, which has an anticipated disposal need of up to 20 MMSCFD. Accordingly, Piñon requires authority to increase the total maximum injection rate of TAG that may be injected between both of its AGI wells from 12 MMSCFD to 20 MMSCFD.

WHEREFORE, Piñon Midstream, LLC requests that this application be set for hearing before the Oil Conservation Commission on August 11, 2022, and, after notice and hearing as required by law, the Commission amend Order No. R-21455-A to increase the maximum daily injection rate of TAG from 12 MMSCFD to 20 MMSCFD.

Respectfully submitted,

HOLLAND & HART LLP

By: 

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Paula M. Vance
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pmvance@hollandhart.com

**ATTORNEYS FOR PIÑON MIDSTREAM,
LLC**

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ALBUQUERQUE, NM 87101
0101 17
AUG 16 2022
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7021 0950 0002 0431 5229

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OFFICIAL USE

Certified Mail Fee \$4.00

Extra Services & Fees (check box, add fee as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$4.08

Total Postage and Fees \$11.33

Sent To
BC + D Operating, Inc.
Street and Apt. No., or PO Box No.
PO Box 302
City, State, ZIP+4®
Hobbs, NM 88241

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Extra Services & Fees (check box, add fee as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$4.08

Total Postage and Fees \$11.33

Sent To
MAX PERMIAN, LLC
Street and Apt. No., or PO Box No.
PO BOX 9287
City, State, ZIP+4®
SALT LAKE CITY, UT 84109

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Certified Mail Fee \$4.00

Extra Services & Fees (check box, add fee as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$4.08

Total Postage and Fees \$11.33

Sent To
NGL South Ranch Inc
Street and Apt. No., or PO Box No.
3773 Cherry Creek North Dr. #1000
City, State, ZIP+4®
Denver, CO 80209

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

ALBUQUERQUE, NM 87101
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(22-028)

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Certified Mail Fee \$4.00

Extra Services & Fees (check box, add fee as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$4.08

Total Postage and Fees \$11.33

Sent To
BUREAU OF LAND MANAGEMENT
Street and Apt. No., or PO Box No.
301 DINOSAUR TRAIL
City, State, ZIP+4®
SANTA FE, NM 87508

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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AUG 16 2022
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Project 22-028

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Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$0.00
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$0.00
☐ Adult Signature Required \$0.00
☐ Adult Signature Restricted Delivery \$0.00

Postage \$4.08
\$11.33
Total Postage and Fees

Sent To
ALLISON MARKS, NEW MEXICO STATE LAND OFFICE
Street and Apt. No., or PO Box No.
310 OLD SANTA FE TRAIL
City, State, ZIP+4®
SANTA FE, NM 87504-1148 87501

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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\$3.25
0101 17
ALBUQUERQUE, NM 87101

Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$0.00
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$0.00
☐ Adult Signature Required \$0.00
☐ Adult Signature Restricted Delivery \$0.00

Postage \$4.08
\$11.33
Total Postage and Fees

Sent To
VERITAS PERMIAN RESOURCES, LLC
Street and Apt. No., or PO Box No.
PO BOX 10850
City, State, ZIP+4®
FORT WORTH, TX 76114

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\$3.25
0101 17
ALBUQUERQUE, NM 87101

Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$0.00
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$0.00
☐ Adult Signature Required \$0.00
☐ Adult Signature Restricted Delivery \$0.00

Postage \$4.08
\$11.33
Total Postage and Fees

Sent To
EOG Resources Inc.
Street and Apt. No., or PO Box No.
5509 Champions Drive
City, State, ZIP+4®
Midland, TX 79706

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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0101 17
ALBUQUERQUE, NM 87101

Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$0.00
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$0.00
☐ Adult Signature Required \$0.00
☐ Adult Signature Restricted Delivery \$0.00

Postage \$4.08
\$11.33
Total Postage and Fees

Sent To
Intrepid Potash - New Mexico LLC
Street and Apt. No., or PO Box No.
1001 17th Street, Suite 1050
City, State, ZIP+4®
Denver CO 80202

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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\$3.25
0101 17
ALBUQUERQUE, NM 87101

Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$0.00
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$0.00
☐ Adult Signature Required \$0.00
☐ Adult Signature Restricted Delivery \$0.00

Postage \$4.08
\$11.33
Total Postage and Fees

Sent To
BROUGHTON PETROLEUM, INC.
Street and Apt. No., or PO Box No.
1205 SILLIMAN ST
City, State, ZIP+4®
SEALY, TX 77474

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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MAIN OFFICE USPS

7021 0950 0002 0431 5298

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Certified Mail Fee \$4.00
\$3.25
0101 17
ALBUQUERQUE, NM 87101

Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$0.00
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$0.00
☐ Adult Signature Required \$0.00
☐ Adult Signature Restricted Delivery \$0.00

Postage \$4.08
\$11.33
Total Postage and Fees

Sent To
FRANKLIN MOUNTAIN ROYALTY INVESTMENTS, LLC
Street and Apt. No., or PO Box No.
44 COOK STREET, SUITE 1000
City, State, ZIP+4®
DENVER, CO 80206

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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Page 1

File Log #002
Project #22-028
Pinon #2 Hearing

USPS Green Cards

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <i>Donnie Hill</i></p> <p><input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to: (22-028)</p> <p>B E + D OPERATING, INC PO BOX 302 HOBBS, NM 88241</p>		<p>B. Received by (Printed Name) <i>Donnie Hill</i></p> <p>C. Date of Delivery <i>8-19-22</i></p>	
<p>2. Article Number (Transfer from service label) 7021 0950 0002 0431 5229</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>	

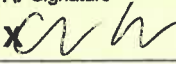
SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <i>x R Duran</i></p> <p><input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to: (22-028)</p> <p>BUREAU OF LAND MANAGEMENT 301 DINOSAUR TRAIL SANTA FE, NM 87508 CFO</p>		<p>B. Received by (Printed Name) <i>Regina Duran</i></p> <p>C. Date of Delivery <i>8-18-22</i></p>	
<p>2. Article Number (Transfer from service label) 7021 0950 0002 0429 1769</p>		<p>D. Is delivery address different from item 1? <input checked="" type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>	

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <i>x Carla Richardt</i></p> <p><input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to: (22-028)</p> <p>BROUGHTON PETROLEUM, INC 1205 Silliman St SEALY, TX 77474</p>		<p>B. Received by (Printed Name) <i>Carla Richardt</i></p> <p>C. Date of Delivery <i>8/22/22</i></p>	
<p>2. Article Number (Transfer from service label) 7021 0950 0002 0431 5281</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>	

Page 2

File Log #002
Project #22-028
Pinon #2 Hearing

USPS Green Cards

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature  <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to: (22-028) EDG Resources Inc 5509 CHAMPIONS DRIVE MIDLAND, TX 79700</p>		<p>B. Received by (Printed Name) Ym Berry</p> <p>C. Date of Delivery 8/19</p>	
<p>2. Article Number (Transfer from service label) 7021 0950 0002 0431 5120</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No</p>	
<p>3. Service Type <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>		<p><input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	

PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature  <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to: (22-028) AMEREDEN II, LLC 2901 VIA FORTUNA, SUITE 600 AUSTIN, TX 78746</p>		<p>B. Received by (Printed Name) C Moran</p> <p>C. Date of Delivery 8/19/22</p>	
<p>2. Article Number (Transfer from service label) 7021 0950 0002 0431 5151</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>3. Service Type <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>		<p><input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature  <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to: (22-028) MAX PERMIAN, LLC PO BOX 9287 SALT LAKE CITY, UT 84109</p>		<p>B. Received by (Printed Name) David B. Hatch</p> <p>C. Date of Delivery AUG 19 2022</p>	
<p>2. Article Number (Transfer from service label) 7021 0950 0002 0431 5311</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>3. Service Type <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>		<p><input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	

PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt

Page 3

File Log #002
Project #22-028
Pinon #2 Hearing

USPS Green Cards

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature X <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to: (22-028)</p> <p>MAVROS OIL COMPANY, LLC PO BOX 50820 MIDLAND, TX 79710</p>		<p>B. Received by (Printed Name) <i>[Signature]</i> C. Date of Delivery <i>8-22-22</i></p>	
<p>2. Article Number (Transfer from service label) 7021 0950 0002 0431 5304</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™</p> <p><input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail</p> <p><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>		<p>PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt</p>	

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature X <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to: (22-028)</p> <p>OXY Y-1 COMPANY 5 GREENWAY PLAZA SUITE, 110 HOUSTON, TX 77046</p>		<p>B. Received by (Printed Name) <i>[Signature]</i> C. Date of Delivery <i>8/20</i></p>	
<p>2. Article Number (Transfer from service label) 7021 0950 0002 0431 5243</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™</p> <p><input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail</p> <p><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>		<p>PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt</p>	

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature X <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to: (22-028)</p> <p>SHARBRO ENERGY, LLC PO BOX 840738 ARTESIA, NM 88211</p>		<p>B. Received by (Printed Name) <i>[Signature]</i> C. Date of Delivery</p>	
<p>2. Article Number (Transfer from service label) 7021 0950 0002 0431 5250</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™</p> <p><input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail</p> <p><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>		<p>PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt</p>	

Page 4

File Log #002
Project #22-028
Pinon #2 Hearing

USPS Green Cards

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature X <i>Pam McWhirter</i> <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to: (22-028)</p> <p>NORTHERN OIL AND GAS CO 4350 BAKER ROAD, SUITE 400 MINNETONKA, MN 55343</p>		<p>B. Received by (Printed Name) <i>Pam McWhirter</i></p> <p>C. Date of Delivery</p>	
<p>2. Article Number (Transfer from service label) 7021 0950 0002 0429 1752</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No</p>	
<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>	

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature X <i>[Signature]</i> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to: (22-028)</p> <p>TAP ROCK OPERATING, LLC 523 PARK POINT DRIVE, SUITE 200 GOLDEN, CO 80401</p>		<p>B. Received by (Printed Name) <i>[Signature]</i></p> <p>C. Date of Delivery 8/19/22</p>	
<p>2. Article Number (Transfer from service label) 7021 0950 0002 0431 5236</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No</p>	
<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>	

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature X <i>[Signature]</i> <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to: (22-028)</p> <p>ALLISON MARKS NEW MEXICO STATE LAND OFFICE 310 OLD SANTA FE TRAIL SANTA FE, NM 87504-1148 87501</p>		<p>B. Received by (Printed Name) <i>[Signature]</i></p> <p>C. Date of Delivery</p>	
<p>2. Article Number (Transfer from service label) 7021 0950 0002 0429 1776</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>	

File Log #002
Project 22-028
Pinon AGI #2

BC&D Operating, Inc.

Tracking Number: 70210950000204315229

Status

Your item was picked up at the post office at 11:09 am on August 19, 2022 in HOBBS, NM 88240.

USPS Tracking Plus® Available ✓

✓ **Delivered, Individual Picked Up at Post Office**

August 19, 2022 at 11:09 am
HOBBS, NM 88240

Bureau of Land Management

Tracking Number: 70210950000204291769

Status

Your item was delivered to an individual at the address at 1:31 pm on August 18, 2022 in SANTA FE, NM 87508.

USPS Tracking Plus® Available ✓

✓ **Delivered, Left with Individual**

August 18, 2022 at 1:31 pm
SANTA FE, NM 87508

Broughton Petroleum, Inc

Tracking Number: 70210950000204315281

Status

Your item was picked up at the post office at 12:37 pm on August 22, 2022 in SEALY, TX 77474.

USPS Tracking Plus® Available ✓

✓ **Delivered, Individual Picked Up at Post Office**

August 22, 2022 at 12:37 pm
SEALY, TX 77474

EOG Resources

Tracking Number: 70210950000204315120

Status

Your item was picked up at a postal facility at 7:47 am on August 19, 2022 in MIDLAND, TX 79702.

USPS Tracking Plus® Available ✓

✓ **Delivered, Individual Picked Up at Postal Facility**

August 19, 2022 at 7:47 am
MIDLAND, TX 79702

File Log #002
Project 22-028
Pinon AGI #2

Ameridev II, LLC**Tracking Number:** 70210950000204315151

Your item was delivered to the front desk, reception area, or mail room at 1:51 pm on August 19, 2022 in AUSTIN, TX 78746.

USPS Tracking Plus® Available ✓**Status**

✓ **Delivered, Front Desk/Reception/Mail Room**

August 19, 2022 at 1:51 pm
AUSTIN, TX 78746

Max Permian LLC**Tracking Number:** 70210950000204315311

Your item was picked up at the post office at 10:57 am on August 19, 2022 in SALT LAKE CITY, UT 84109.

USPS Tracking Plus® Available ✓**Status**

✓ **Delivered, Individual Picked Up at Post Office**

August 19, 2022 at 10:57 am
SALT LAKE CITY, UT 84109

Mavros Oil Company, LLC**Tracking Number:** 70210950000204315304

Your item was picked up at a postal facility at 10:20 am on August 22, 2022 in MIDLAND, TX 79705.

USPS Tracking Plus® Available ✓**Status**

✓ **Delivered, Individual Picked Up at Postal Facility**

August 22, 2022 at 10:20 am
MIDLAND, TX 79705

OXY Y-1 Company**Tracking Number:** 70210950000204315243

Your item was picked up at a postal facility at 6:35 am on August 22, 2022 in HOUSTON, TX 77227.

USPS Tracking Plus® Available ✓**Status**

✓ **Delivered, Individual Picked Up at Postal Facility**

August 22, 2022 at 6:35 am
HOUSTON, TX 77227

File Log #002
Project 22-028
Pinon AGI #2

Sharbro Energy, LLC**Tracking Number:** 70210950000204315250**Status**

Your item was picked up at the post office at 10:36 am on August 19, 2022 in ARTESIA, NM 88210.

✓ **Delivered, Individual Picked Up at Post Office**

August 19, 2022 at 10:36 am
ARTESIA, NM 88210

USPS Tracking Plus® Available ✓

Northern Oil & Gas Co.**Tracking Number:** 70210950000204291752**Status**

Your item was delivered to an individual at the address at 9:00 am on August 19, 2022 in HOPKINS, MN 55343.

✓ **Delivered, Left with Individual**

August 19, 2022 at 9:00 am
HOPKINS, MN 55343

Tap Rock Operating, LLC**Tracking Number:** 70210950000204315236**Status**

Your item has been delivered to an agent for final delivery in GOLDEN, CO 80401 on August 19, 2022 at 11:18 am.

✓ **Delivered to Agent for Final Delivery**

August 19, 2022 at 11:18 am
GOLDEN, CO 80401

USPS Tracking Plus® Available ✓

Allison Marks- NM State Land Office**Tracking Number:** 70210950000204291776**Status**

Your item was picked up at a postal facility at 6:49 am on August 22, 2022 in SANTA FE, NM 87501.

✓ **Delivered, Individual Picked Up at Postal Facility**

August 22, 2022 at 6:49 am
SANTA FE, NM 87501

USPS Tracking Plus® Available ✓

File Log #002
Project 22-028
Pinon AGI #2

Franklin Mountain Royalty

Tracking Number: 70210950000204315298

Your item was delivered to the front desk, reception area, or mail room at 4:20 pm on August 19, 2022 in DENVER, CO 80206.

Status

 **Delivered, Front Desk/Reception/Mail Room**


August 19, 2022 at 4:20 pm
DENVER, CO 80206

Intrepid Potash

Tracking Number: 70210950000204315137

Your item was delivered to the front desk, reception area, or mail room at 10:53 am on August 19, 2022 in DENVER, CO 80202.

Status

 **Delivered, Front Desk/Reception/Mail Room**

August 19, 2022 at 10:53 am
DENVER, CO 80202

NGL South Ranch

3773 Cherry Creek North Drive #1000, Denver, CO 80209

Tracking Number: 70210950000204315144

Your item was returned to the sender on August 22, 2022 at 8:10 am in DENVER, CO 80209 because the address was vacant or the business was no longer operating at the location and no further information was available.

Status

Vacant

August 22, 2022 at 8:10 am
DENVER, CO 80209

Get Updates 

Delivery confirmed via FedEx

File Log #002
Project 22-028
Pinon AGI #2

Starboard Permian

Tracking Number: 70210950000204315267

Status

Your package will arrive later than expected, but is still on its way. It is currently in transit to the next facility.

In Transit, Arriving Late

August 20, 2022

Veritas

Tracking Number: 70210950000204315274

Status

Your package will arrive later than expected, but is still on its way. It is currently in transit to the next facility.

In Transit, Arriving Late

August 26, 2022

Proof of FedEx Notice Delivery to NGL South Ranch, Inc.



September 01, 2022

Dear Customer,

The following is the proof-of-delivery for tracking number: 777818974489

Delivery Information:

Status:	Delivered	Delivered To:	Receptionist/Front Desk
Signed for by:	C.STILES	Delivery Location:	6120 S YALE AVE 805
Service type:	FedEx Standard Overnight		
Special Handling:	Deliver Weekday		TULSA, OK, 74136
		Delivery date:	Sep 1, 2022 12:41

Shipping Information:

Tracking number:	777818974489	Ship Date:	Aug 31, 2022
		Weight:	1.0 LB/0.45 KG

Recipient:NGL South Ranch, Inc.
6120 South Yale Avenue
Suite 805
TULSA, OK, US, 74136**Shipper:**Liz Hill,
500 MARQUETTE AVE. NW #1350
ALBUQUERQUE, NM, US, 87102**Reference**

20-028



Thank you for choosing FedEx

Additional Follow-Up Notices via E-Mail Correspondence

From: dwhite@geolex.com
To: jlierly@starboardpermian.com
Cc: sflores@geolex.com
Subject: RE: Notice of Piñon Midstream, LLC C-108 Application
Date: Thursday, September 1, 2022 10:32:25 AM
Attachments: [9_1_22_Starboard Follow-Up Notification.pdf](#)
Importance: High

Good day Mr. Lierly,

I hope this correspondence finds you well. My name is David White with Geolex, Inc. and I'm reaching out regarding a notice of application that was sent to you, via Certified Mail, on August 16, 2022. The intent of the mailing was to provide you notice of Piñon Midstream's application to amend an existing injection permit, as you have been identified as an interested party. This notice was accompanied by complete copies the application and all associated amendment application materials. Please verify if you have received this notification, as we have not yet received the U.S.P.S. Certified Mail confirmation of delivery (Green Card).

To assure you are provided with a copy of these materials, I wanted to follow up and provide you with electronic versions. These can be found attached in this correspondence and include all materials that accompanied the August 16, 2022 shipment.

If you have any questions or wish to discuss further, please feel free to reach out anytime. My contact information is included below.

Regards,

David A. White, P.G.
Geolex, Incorporated
500 Marquette Avenue NW, Suite 1350
Albuquerque, NM 87102
(505) 842-8000 Office
(859) 967-7231 Cell

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From: [Santiago Flores](#)
To: ["Randy Blurton"](#)
Cc: ["David White"](#)
Subject: RE: Notice of Piñon Midstream, LLC C-108 Application
Date: Thursday, September 1, 2022 1:39:35 PM

Thank you for your reply and the clarification. Our records indicated that Northern Oil and Gas Co. was also noticed for this application.

Cheers,

Santiago Flores, P.G. – Geolex, Incorporated®
(505) 220-4613 – Cell
(505) 842-8000 – Office

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From: Randy Blurton <rblurton@veritasenergyllc.com>
Sent: Thursday, September 1, 2022 1:28 PM
To: Santiago Flores <SFlores@Geolex.com>
Cc: David White <dwhite@Geolex.com>
Subject: RE: Notice of Piñon Midstream, LLC C-108 Application

Received but we sold the properties giving rise to this notice. See attached Lea County conveyance from Veritas to NOG. NOG owns an interest in the Widmayer wells that were drilled by Taprock directly offsetting the notice.

Thanks,

Randy

From: Santiago Flores <SFlores@Geolex.com>
Sent: Thursday, September 1, 2022 12:35 PM
To: Randy Blurton <rblurton@veritasenergyllc.com>
Cc: David White <dwhite@Geolex.com>
Subject: RE: Notice of Piñon Midstream, LLC C-108 Application

Good Afternoon, Mr. Blurton.

Pursuant to our conversation over the phone this morning, I have attached a complete electronic copy of the notice we discussed. Physical copies of the notice were mailed to your office via Certified Mail on August 16, 2022. As Veritas has been identified as an interested party, the mailing was to provide you notice of Piñon Midstream's application to amend an existing injection permit for injection wells located approximately 6 miles west of Jal, New Mexico. The Certified Mail notices, as well as the electronic copies attached to this correspondence, are accompanied by complete copies of the application and all associated amendment application materials. If you could, please verify receipt of this electronic notice.

Thank you for your time in this matter. If you have any questions or wish to discuss further, please feel free to reach out anytime. My contact information is included below.

Regards,
Santiago Flores, P.G.
Geolex, Incorporated®
500 Marquette Ave. NW Suite 1350
Albuquerque, NM 87102
(505) 842-8000 Office
(505) 220-4613 Cell

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Affidavit of Publication

STATE OF NEW MEXICO
COUNTY OF LEA

I, Daniel Russell, Publisher of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, solemnly swear that the clipping attached hereto was published in the regular and entire issue of said newspaper, and not a supplement thereof for a period of 1 issue(s).

Beginning with the issue dated
August 19, 2022
and ending with the issue dated
August 19, 2022.



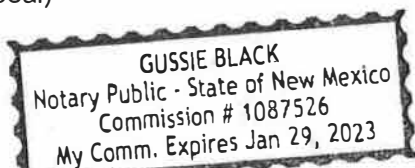
Publisher

Sworn and subscribed to before me this
19th day of August 2022.



Business Manager

My commission expires
January 29, 2023
(Seal)



This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937 and payment of fees for said

LEGAL

LEGAL

LEGAL

LEGAL NOTICE
August 19, 2022

**STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL
RESOURCES DEPARTMENT OIL CONSERVATION DIVISION SANTA FE,
NEW MEXICO**

The State of New Mexico, Energy Minerals and Natural Resources Department, Oil Conservation Division ("Division") hereby gives notice that the Division will hold public hearings before a hearing examiner on the following case. During the COVID-19 Public Health Emergency, state buildings are closed to the public and Division hearings will be conducted remotely. The public hearing for the following case will be electronic and conducted remotely. The hearing will be conducted on **Thursday, September 8, 2022, beginning at 8:15 a.m.** To participate in the electronic hearing, see the instructions posted below. The docket may be viewed at <https://www.emnrd.nm.gov/ocd/hearing-info/> or obtained from Marlene Salvidrez, at Marlene.Salvidrez@state.nm.us. Documents filed in the case may be viewed at <https://ocdimage.emnrd.nm.gov/imagimg/Default.aspx>. If you are an individual with a disability who needs a reader, amplifier, qualified sign language interpreter, or other form of auxiliary aid or service to attend or participate in a hearing, contact Marlene Salvidrez at Marlene.Salvidrez@state.nm.us, or the New Mexico Relay Network at 1-800-659-1779, no later than August 28, 2022.

STATE OF NEW MEXICO TO:
All named parties and persons
having any right, title, interest
or claim in the following case
and notice to the public.

(NOTE: All land descriptions herein refer to the New Mexico Principal Meridian whether or not so stated.)

To: All affected parties, including: EOG Resources, Inc.; Intrepid Potash - New Mexico, LLC; NGL South Ranch, Inc.; Ameradev II, LLC; BC & D Operating, Inc.; Tap Rock Operating, LLC; Broughton Petroleum, Inc.; Franklin Mountain Royalty Investments, LLC; Mavros Oil Company, LLC; Max Permian, LLC; Northern Oil and Gas Co.; Oxy Y-1 Company; Sharbro Energy, LLC; Starboard Permian; Tap Rock Resources II, LLC; Veritas Permian Resources, LLC; and Bureau of Land Management.

Case No. 22977: Application of Piñon Midstream, LLC to Amend Commission Order No. R-21455-A to increase the maximum daily injection rates for the Independence AGI #1 and #2 Wells, Lea County, New Mexico. Applicant in the above-styled cause seeks to amend Commission Order No. R-21455-A to increase the maximum daily injection rate of treated acid gas for disposal through the Independence AGI #1 and #2 wells from 12 MMSCFD to 20 MMSCFD. The Independence AGI #1 well (API No. 30-025-48081) is an existing vertical well with a surface and bottom hole location approximately 829 feet from the north line and 1,443 feet from the west line (Unit C) of Section 20, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico. It was approved to inject within the Devonian and Silurian formations from a depth of approximately 16,230 to 17,900 feet deep under Commission Order No. R-21455-A. Independence AGI #2 well (API No. 30-025-49974), will be a deviated well with a surface location approximately 1,180 feet from the north line and 1,578 feet from the west line (Unit C) and a bottom hole location approximately 1,033 feet from the south line and 2,132 feet from the west line (Unit L) in Section 20, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico. It was approved to inject within the Devonian and Silurian formations from approximately 16,080 to 17,683 feet deep under administrative order SWD-2464. Said area is located approximately 6 miles west of Jal, New Mexico. #37955

67100754

HOLLAND & HART LLC
PO BOX 2208
SANTA FE, NM 87504-2208

00270000

BEFORE THE OIL CONSERVATION COMMISSION

Santa Fe, New Mexico

Exhibit No. G

Submitted by: **Piñon Midstream, LLC**

Hearing Date: September 8, 2022

Case No. 22977