Monitoring Well Conversion (OCD Comments)

EOG Resources Inc (OGRID 7377)
Ross Gulch 8 No.3
(SWD-1311)
Action ID 254154

May 13, 2024

Attachments:

From: Harris, Anthony, EMNRD

Jordan Kessler; Goetze, Phillip, EMNRD To:

Wrinkle, Justin, EMNRD; Gebremichael, Million, EMNRD; Patrick Padilla; Tyler Burns Cc:

Subject: RE: [EXTERNAL] Ross Gulch monitoring well conversion request

Date: Monday, February 19, 2024 2:34:00 PM image001.png

> image002.png image005.png image003.png

Good Day Jordan

We have some questions regarding the proposed running procedure for the gauge and the dual packoff assembly. To avoid any confusion, I wish to clarify the following terminology

- **Swab/Crown Valve**: **(CV)** Uppermost valve in the image below
- Flow Cross: 4-way Block below the crown valve with side outlets for wing & kill valves
- Upper Master Valve: (UMV) Manual valve below the flow cross
- Lower Master Valve: (LMV) Manual Valve below the Upper valve (ie. lowermost valve in below image)



Swab / Crown Valve (CV)

Upper Master Valve (UMV)

Lower Master Valve (LMV)

I have pasted a copy of your procedure below, and inserted questions / items to clarify in red text.

Procedure

(Top Perf: 4,062' Bottom Perf: 5,517'- Casing:7" 26# HC L80 8RD)

Contact Jose Sandoval to get gauge and running unit on location

Tally Production Systems – 432-888-0075

- 1. MIRU Modified Wireline Unit. Prep to run real-time bottom hole pressure gauge (RT BHPG) and cable.
- 2. NU 5K BOP and new swap valve packer. Function test all valves and pressure test connections before proceeding.
 - Please provide a stack-up drawing to illustrate the pressure control equipment utilized for deployment and retrieval of the gauge.
 - It is assumed both packoffs will be pre-installed below the BOP during deployment and/or retrieval? Please confirm
 - What is the estimated weight of the BOP's and Pressure control

equipment that will be transferred to the packoff assemblies?

- Please confirm the packoffs are designed to handle the compressive and shear loads transmitted via the BOP and Pressure control equipment during rigup, pressure testing, deployment and retrieval.
- Prior to installing the BOP, will the gauge and cable already be deployed below the crown valve?
 - Note: The gauge is ~ 14" long and OD=0.75". Since the Packoff ID= 0.25", the only option appears to deploy the gauge below the crown valve (ie. hung across the flow cross and UMV) while rigging up the BOP? Please confirm
 - Barrier protocol Please confirm which valves will be open / closed during rigup and pressure testing of the BOP and lubricator
- 3. TIH 0.75" OD BHPG and 0.25" OD cabling. Stop at 4,020'.
 - How is depth control achieved to ensure the gauge is placed at 4020 ft?
- 4. Secure cabling. NU double swap packer. ND Lubricator, RD Wireline Unit.
 - Is this different from the swab valve packer that was installed in Step 2?
 - How is the packer installed when the BOP and lubricator are already rigged up on the well?
 - No mention of rigging down BOP. Please confirm when BOP will be removed. Presumably after pressure seal is confirmed in Step 5?
- 5. Check for leaks and increase packing fluid as needed to confirm pressure seal.
 - How is pressure seal confirmed? Via inflow test? How do you confirm if there is no pressure on the wellhead at the time?
 - Are there any other pressure tests planned to confirm the packoff seal integrity?
- 6. Remove wheels from lower and upper master valves and place near wellhead. Wheels are removed to avoid accidental cutting of the wire hanging in the well.
- 7 RDMC
- 8. Turn over well to SWD Foreman Adrian Flores. All injection capabilities are to be removed from the well site.
 - a. Disconnect injection line from wellhead LOTO
 - b. Remove power to pumps LOTO
 - c. Remove inlet valve to facility LOTO

Additional items:

- 1. Please provide a procedure detailing how the cable and gauge will be recovered <u>assuming</u> **positive** pressure on the well
- 2. For the benefit of OCD inspectors who will visit the site, please provide the following:
 - a. Details of what the entire stack-up assembly will look like once the gauge has been deployed.
 - b. Details on what the OCD Inspectors need to check during visits to the well
 - i. Packoff pressure?
 - ii. Level / quantity of Packing fluid in the reservoir?
 - iii. Packing fluid pump?
 - iv. Surface readout panel?
 - v. Other items?

Thanks and Regards

Regards Tony Harris Petroleum Specialist

Anthony.harris@emnrd.nm.gov

505 549 8131.



From: Jordan Kessler < Jordan_Kessler@eogresources.com>

Sent: Friday, February 16, 2024 10:55 AM

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

Cc: Wrinkle, Justin, EMNRD < Justin.Wrinkle@emnrd.nm.gov>; Harris, Anthony, EMNRD

<anthony.Harris@emnrd.nm.gov>; Gebremichael, Million, EMNRD

<Million.Gebremichael@emnrd.nm.gov>; Patrick Padilla <Patrick_Padilla@eogresources.com>; Tyler

Burns <Tyler_Burns@eogresources.com>

Subject: RE: [EXTERNAL] Ross Gulch monitoring well conversion request

Hi Phil,

Please see attached:

- 1. Updated letter addressing your additional questions below;
- 2. Gauge Run Procedure; and
- 3. Diagram illustrating well control protocol.

Please let Tyler and I know what additional questions you have. We would propose MITs every 3 years, and annual bradenheads.

Thanks, Jordan

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

Sent: Tuesday, January 2, 2024 12:43 PM

To: Jordan Kessler < <u>Jordan Kessler@eogresources.com</u>>

Cc: Wrinkle, Justin, EMNRD < Justin.Wrinkle@emnrd.nm.gov >; Harris, Anthony, EMNRD

<a href="mailto:, Gebremichael, Million, EMNRD">

< Million.Gebremichael@emnrd.nm.gov>; Patrick Padilla < Patrick Padilla@eogresources.com>

Subject: RE: [EXTERNAL] Ross Gulch monitoring well conversion request

Some people who received this message don't often get email from phillip.goetze@emnrd.nm.gov. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon Jordan. Hopefully, the New Year as well as Christmas was enjoyable. I am following up on our review of EOG's submittal with one more request of details. This information request revolves around the wellhead and proposed monitoring equipment to be placed in the well. Specifically:

- 1. No details were provided on how this gauge will be hung in the well (i.e. Is a gauge hanger run to hang/support the weight of the gauge and cable? If no gauge hanger is planned, is the gauge and cable suspended from surface?). Also related to this subject, no details were provided to document how EOG will achieve a pressure seal around the cable at surface.
- 2. Please provide details on well inspection frequency (to verify packoff is not leaking) and well control protocol for this well. This should include an overview of the barrier(s) (closed and closeable) available for well control, a procedure to follow if a leak is observed in the packoff / stuffing box and a procedure if the packoff has to be replaced with positive pressure on the well (noting that the master valve cannot be closed below the packoff if there is a cable across the valve).

These requested items are an effort on our part to standardize and address possible issues with wellhead completions for this type of well, especially since this information is to be provided to our field inspectors. Additionally, OCD must consider how the wells will be monitored with respect to passive testing such as annual bradenhead tests or the periodic use of active mechanical integrity testing. If you need assistance on the content of our request, please contact Tony Harris at your convenience. Thanks. PRG

From: Jordan Kessler < <u>Jordan Kessler@eogresources.com</u>>

Sent: Friday, December 1, 2023 12:16 PM

To: Goetze, Phillip, EMNRD < phillip.goetze@emnrd.nm.gov **Cc:** Patrick Padilla padilla@eogresources.com

Subject: [EXTERNAL] Ross Gulch monitoring well conversion request

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Phil,

Happy Friday! I hope you're doing well. Patrick asked me to put together a letter requesting conversion of the Ross Gulch 3 SWD into a DMG monitoring well. I've included a request to rescind our injection authority, a detailed procedure for the conversion, and answers to a series of questions that you had posed.

Please let me know what more information you need to process this request.

Thanks, Jordan

Jordan Kessler

Senior Regulatory Advisor



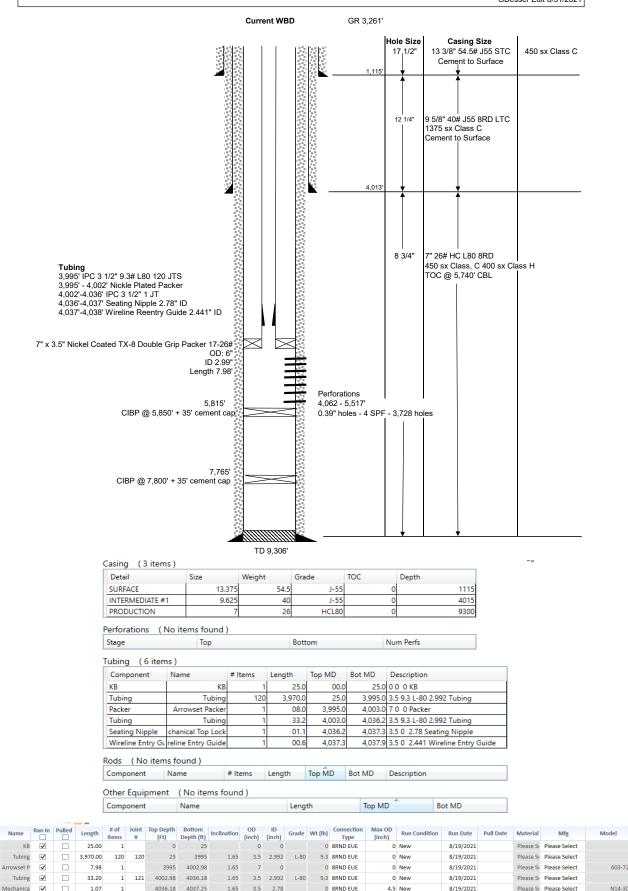
125 Lincoln Avenue, Suite 213 Santa Fe, NM 87501

Mobile: (432) 488-6108 Office: (575) 748-4158

jordan_kessler@eogresources.com

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Office <u>District I</u> – (575) 393-6161				evised July 18, 2013	
1625 N. French Dr., Hobbs, NM 88240 District II – (575) 748-1283	0 0		WELL API NO. 30-015-3	39736	
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<u>District IV</u> – (505) 476-3460 1220 S. St. Francis Dr., Santa Fe, NM	Santa Fe, NM 87505		6. State Oil & Gas Lease	No.	
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EOG EOG	RESOURCES INC		737	77	
3. Address of Operator PO BC	DX 2267 MIDLAND, TX 79702	2	10. Pool name or Wildcan SWD; DELAW		
4. Well Location					
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13. Describe proposed or comp	pleted operations. (Clearly state all				
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proposed completion or rec	completion.				
EOG PROPOSES TO CANCEL	INJECTION PERMIT NO SWD-1311.				
	RT THIS WELL TO A MONITOR WELL EVAULATE THE IMPACT OF OTHER S				
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AND MITIGATE SHALLOW DRI	LLING CHALLENGES IN THE IMMEDIA	ATE AREA.			
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I hereby certify that the information	above is true and complete to the	best of my knowledg	e and belief.		
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Type or print name <u>Kay Maddox</u>	E-mail addre	ess: kay_maddox@ec	ogresources.com PHONE: _	432-638-8475	
					
For State Use Only					
APPROVED BY:	TITLE		DATE		

Ross Gulch 8 #3 SWD 32.0568161,-103.8011627 API 30-015-39736 Eddy County, New Mexico Max Permited Injection Pressure: 800 psi Permitted Injection Zone 4000-6400' ODesser Edit 8/31/2021



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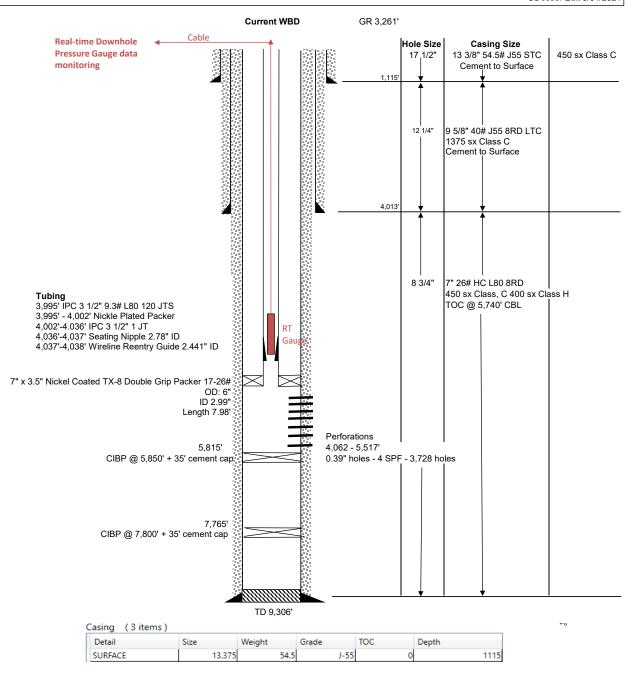
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Wireline Entry Guide Wireline Er

Monitor Well Reclassification Porposal August 2023



32.0568161,-103.8011627
API 30-015-39736
Eddy County, New Mexico
Max Permited Injection Pressure: 800 psi
Permitted Injection Zone 4000-6400'
ODesser Edit 8/31/2021





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To: <u>Goetze, Phillip, EMNRD</u>

Cc: Wrinkle, Justin, EMNRD; Harris, Anthony, EMNRD; Gebremichael, Million, EMNRD; Patrick Padilla; Tyler Burns

Subject: RE: [EXTERNAL] Ross Gulch monitoring well conversion request

Date: Friday, February 16, 2024 10:57:51 AM

Attachments: <u>image001.pnq</u>

L. OCD re Ross Gulch 3 well conversion updated.docx

Ross Gluch.pptx

Ross Gulch 8 #3 SWD RT Gauge Run Procedure TB 12424.docx

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Senior Regulatory Advisor



125 Lincoln Avenue, Suite 213 Santa Fe, NM 87501

Mobile: (432) 488-6108 Office: (575) 748-4158

jordan kessler@eogresources.com



P.O. Box 2267, Midland, Texas 79702 Phone: (432) 686-3600 Fax: (432) 686-3773

November 20, 2023

Oil Conservation Division New Mexico Energy, Minerals and Natural Resources Department Attn: Phillip Goetze Horizon Building 8801 Horizon Blvd., Suite 260 Albuquerque, NM 87113

DELIVERED VIA ELECTRONIC MAIL

RE: Notice of Intent to Cancel SWD Injection Authority and Convert to Monitoring Well: Ross Gulch 8 #3 SWD

EOG Resources, Inc. ("EOG") is the operator of the Ross Gulch 8 No. 3 SWD (API. No. 30-015-39736) ("Well"), a saltwater disposal well located in Section 8, Township 26 South, Range 31 East, NMPM, Eddy County, New Mexico. EOG received administrative authority from the Oil Conservation Division ("Division") for injection pursuant to SWD-1311, and commenced injection into the Delaware Mountain Group formation through the Well in 2012.

Following conversations with the Division, EOG requests 1) cancellation of the injection authority authorized by SWD-1311; and 2) permission to convert the Well into a pressure monitoring well. *Attachment 1* outlines EOG's proposed procedure for converting the Well into a pressure monitoring well, including a wellbore diagram and a gauge data sheet for the bottom pressure monitoring gauge. *Attachment 2* includes responses to questions posed by the Division.

As a pressure monitoring well, EOG understands that the Well will be considered an active well, and accordingly, that the Well will not contribute to EOG's inactive well count for purposes of NMAC 19.15.5.9. EOG consents to periodic MIT testing of the Well, with a frequency to be specified by the Division.

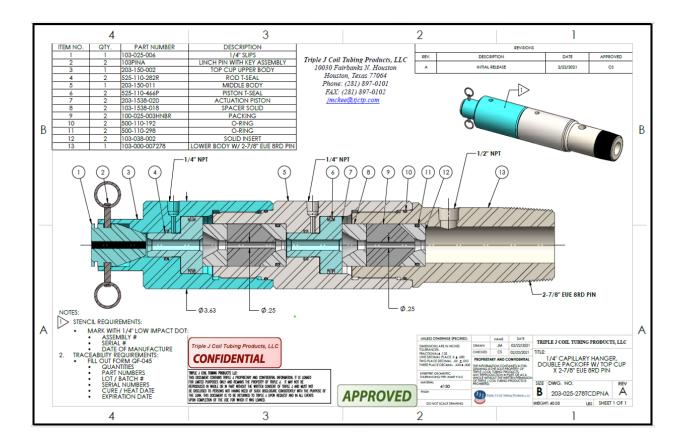
If you have any questions, please contact me at (432) 688-6108 or jordan kessler@eogresources.com.

Sincerely,

Jordan Kessler Senior Regulatory Advisor, EOG Resources Inc.

Attachment 1

- The gauge would hang in the Ross Gulch SWD right around 4,000' near the end of tubing see WBD pictorial below.
- The gauge will be hanging on a cable that is then led up through the top of the swap valve where a dual packing is set.
- The cable is thread through the dual packing that is rated to 5,000 psi, in-kind rating to the tree.
- The rest of the cable spool sets near the wellhead as pictured. We can cut this but chose to keep the reel if we moved this gauge to another well that needed more length.
- We set a camera trailer facing the wellhead to maintain visual. This will be monitored continuously by our control room in Midland.
- In the event of a leak detected from the camera, control room will dispatch an operator to control leak.
- We will perform an on-site visual inspection for leaks daily.
- The gauge cable is wired up to our PLC that brings in the real-time data polling every 2 seconds.
 - o Pressure & Temperature data is brought into Cygnet where it is archived and trend-able. See screenshot below of Cygnet.
- Casing valves are unaffected. We can perform MITs.
- In the event of a well control event, we will pump a kill fluid into the wellbore via the wing valve connection.
- In the event of a single failed packoff, we will kill the well and install a new dual packoff.
- We will disconnect the injection line to prevent any ability for water to go downhole. You will see a physical separation between the injection line leading to the well and the tree.



Piezo Perm

Application

DataCan's Multi-Gauge Piezo Bottom Pressure Tool can be used on its own or at the bottom of a multi-gauge pressure system. This tool comes in a standard version as well as a pressure testable version for quality assurance.

Renefits

The Multi-Gauge Piezo Bottom Pressure Tool is easy to install and produces high quality reservoir data in real time. It's fully welded construction, dual protection metal to metal seal design, and hermetically sealed electronics make it a very reliable product. This is the final gauge in a multi-gauge system. Alternatively, this gauge can be used on it's own as a single gauge in a single gauge system.

The Crimp-y-doo, at the heart of DataCan's new gauge design, ensures correct wire prep and prevents the TEC conductor from pulling up into the armor. If you find yourself assembling a gauge without a crimpy-doo, you just better crimp-y-don't!

Features

- Fully Welded Construction
- Hermetically Sealed
- o Corrosion Resistant NACE MR0175
- Slim 0.75" Diameter
- o Pressure Testable Option

Multi-Gauge Piezo Bottom Pressure Tool - Standard

	Temperature	Part No.					
Pressure		1/8" Wire		1/4" Wire		4mm Wire	
		SS	Inconel	SS	Inconel	SS	Inconel
750 psi		111542	111548	111530	111536	111554	111560
1,500 psi		111543	111549	111531	111537	111555	111561
3,000 psi		111544	111550	111532	111538	111556	111562
6,000 psi		111545	111551	111533	111539	111557	111563
10,000 psi		111546	111552	111534	111540	111558	111564
15,000 psi		111547	111553	111535	111541	111559	111565

Multi-Gauge Piezo Bottom Pressure Tool - Pressure Testable

	Temperature	Part No.					
Pressure		1/8" Wire		1/4" Wire		4mm Wire	
		SS	Inconel	SS	Inconel	SS	Inconel
750 psi		112166	112172	112154	112160	112178	112184
1,500 psi		112167	112173	112155	112161	112179	112185
3,000 psi	15000	112168	112174	112156	112162	112180	112186
6,000 psi	150°C	112169	112175	112157	112163	112181	112187
10,000 psi		112170	112176	112158	112164	112182	112188
15,000 psi		112171	112177	112159	112165	112183	112189

Accessories

Accessory Type		Part No.	
	1/8" Wire	1/4" Wire	4mm Wire
Redress Kit Sweet	112758	112756	112760
Redress Kit Sour	112759	112757	112761

Specifications

	Pressure	Temperature
Accuracy Up To	0.03% F.S.	0.5°C
Resolution	0.0003% F.S.	0.005°C
Drift	< 3 psi / year	< 0.1°C / year

Manuals

Permanent Downhole Gauge - User Manual



Visit Us: DataCan.ca

Email: Info@DataCan.ca

Canada: +1 (403) 352.2245

USA: +1 (281) 974.7010

Attachment 2

- 1. Please clarify the pressure equipment: is it a real-time system or a down-hole recorder that is periodically pulled? The wellbore diagram for the NOI shows real time.
 - This is a real-time system. It is not pulled periodically but rather we are able to receive 5 second polled data in real-time and captured through Cygnet.
- 2. In your summary, would you please specify the size of the gauge cable, and whether the Master valve and/or swab valve are capable of cutting the cable if circumstances required the well to be shut-in with the gauge cable across those valves. A question was raised whether the well could be shut-in properly should there be a downhole issue especially if there is no backpressure valve in the tubing hanger profile due to a cable running to surface.
 - Gauge Size: 0.25" OD X .035" Wall, 16AMG Solid, FEP/Poly, 316 SS
 - While specs are not published for master valves regarding cutting wire it is accepted as something these gate valves are able to accomplish. I believe due to the size of the wire we would not have a problem cutting to achieve isolation. It is advised from our internal wellhead experts to have additional shear pins on-hand which we can certainly store on location should an issue arise requiring us to shut the master valves.
- 3. Current reservoir conditions: Any information on the current reservoir pressure would be beneficial including the expected static water level in the tubing. Also a statement on the performance of the well when it was operated as a SWD would be helpful.
 - Water level is at surface. Estimated bottom-hole pressure is 2,239 psi.
 - We have only injected 179 barrels this year due to injection permit reductions.
 - In 2022 we could inject ~1,230 barrels per day at an average 600 psi injection pressure.
 - We have not performed recent well-work or acidizing to gain additional injection productivity due to seismicity response area curtailments.
- 4. No details were provided on how this gauge will be hung in the well (i.e. Is a gauge hanger run to hang/support the weight of the gauge and cable? If no gauge hanger is planned, is the gauge and cable suspended from surface?). Also related to this subject, no details were provided to document how EOG will achieve a pressure seal around the cable at surface.
 - The gauge will be suspended from surface supported by the tensile strength of the cable, 2500 lbs/ft, which we believe is sufficient to withstand the weight of the gauge & cable, 404 lb. We will have a dual mechanical wireline seal (packoff) at surface with packing fluid. (see diagram above) We will pressure test the seal by increasing the pressure with a hydraulic pump.

- 5. Please provide details on well inspection frequency (to verify packoff is not leaking) and well control protocol for this well. This should include an overview of the barrier(s) (closed and closeable) available for well control, a procedure to follow if a leak is observed in the packoff / stuffing box and a procedure if the packoff has to be replaced with positive pressure on the well (noting that the master valve cannot be closed below the packoff if there is a cable across the valve).
 - We will have continuous monitoring via the camera to our control room.
 - We will visually inspect daily on-site.
 - In the event of a well control event, we will pump a kill fluid into the wellbore via the wing valve connection.
 - In the event of a single failed packoff, we will kill the well and install a new dual packoff.



Seog resources

Ross Gulch 8 #3 SWD

Olivia Desser 11/28/2023

Ross Gulch 8 #3 SWD

Real Time Gauge Run

API #: 30-015-39736

Location: Eddy County, NM

Lat/Long: 32.0568161, -103.8011627

H2S: ND

Perforations: 4,062 – 5,517' (3 stages) Injection Formation: Bell Canyon

Injection Zone: 4000 – 6400, packer must be set no higher than 100' above injection zone.

Maximum Wellhead Injection Pressure: 800 psi

Executive Summary: Running real-time pressure & temperature gauge to sit above the wireline reentry guide for continuous monitoring.

Procedure

(Top Perf: 4,062' Bottom Perf: 5,517'— Casing:7" 26# HC L80 8RD) Contact Jose Sandoval to get gauge and running unit on location Tally Production Systems — 432-888-0075

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- 7. RDMO
- 8. Turn over well to SWD Foreman Adrian Flores. All injection capabilities are to be removed from the well site.
 - a. Disconnect injection line from wellhead LOTO
 - b. Remove power to pumps LOTO
 - c. Remove inlet valve to facility LOTO

Kerry Fortner, Compliance Officer A Office: 575-393-6161 ext. 120

Cell: 575-263-6633

Kerry.fortner@state.nm.us

Gary Robinson, Compliance Officer A

Office: 575-393-6161 ext.106

Cell: 575-263-4507



Ross Gulch 8 #3 SWD

Olivia Desser 11/28/2023

Gary.robinson@state.nm.us

Production Engineer: Olivia Desser 11/30/2023

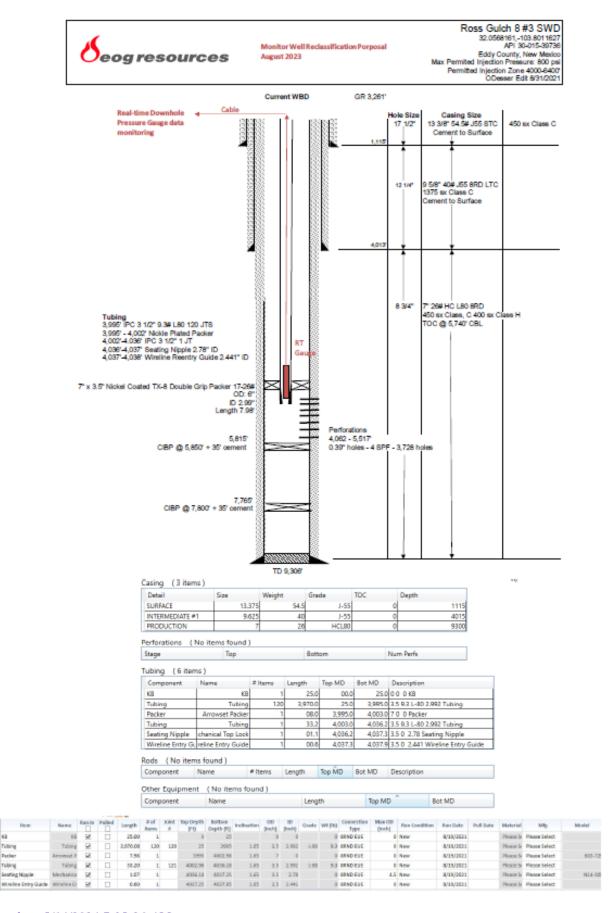
Emergency Contact

Emergency Contact Information							
In the event of an accident/safety incident involving EOG employees or contract personnel contact:							
Name	Title	Cell	Office				
Brian Chandler	Safety Manager	817-239-0251	817-806-0486				
Ashley Mayfield	Sr. Safety Rep	432-258-7998	432-686-3662				
In the event of a spill	or environmental release contact:						
Name	Title	Cell	Office				
Paige Jordan	Environmental Rep	281-624-7374	432-686-3745				
Andrea Guerrero	Environmental Rep	432-385-6568	432-848-9154				
Doug Lowrie	Environmental Manager	432-425-6923	432-686-3755				
Production Departme	nt Contacts:						
Name	Title	Cell	Office				
Joe Justus	Water Resources Superintendent	817-733-3645					
Adrian Flores	SWD Foreman	432-250-9848					
Ron Willett	Production Advisor	432-230-2135	432-686-3775				
Tim Singley	Sr. Production Superintendent	601-731-4718	432-686-6900				
Olivia Desser	Production Engineer	443-797-9314	432-238-8639				
Kent Caudle	Chemical Advisor EOG	432-210-9260					
Police/Fire/Hospital C	ontacts						
Fire	911						
Sheriff (Eddy County)			575-887-7551				
Sheriff (Lea County)			575-396-3611				
Hospital – Carlsbad Medical Center (Carlsbad, NM)			575-887-4100				
Hospital – Lea Regional Medical Center (Hobbs, NM)			575-492-5000				
Hospital – Nor-Lea Ger	575-396-6611						
Hospital – Winkler Coι	432-586-5864						



Ross Gulch 8 #3 SWD

Olivia Desser 11/28/2023



Tubing

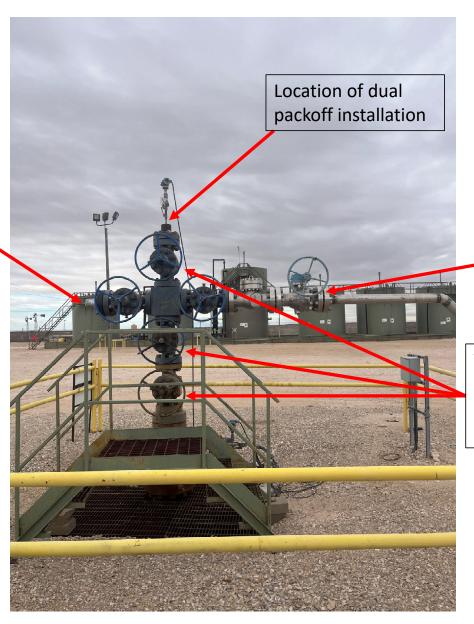
Tulong

eog resources

Ross Gulch 8 #3 SWD

Olivia Desser 11/28/2023

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Injection line to be blinded off.

Valve handles to be removed to prevent unintentional cutting of cable.

District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720

District II 811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720

District III 1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 344016

CONDITIONS

Operator:	OGRID:
EOG RESOURCES INC	7377
5509 Champions Drive	Action Number:
Midland, TX 79706	344016
	Action Type:
	[IM-SD] Well File Support Doc (ENG) (IM-AWF)

CONDITIONS

Created By		Condition Date	
anthony.harris	None	5/14/2024	