



**DELIVERED VIA OVERNIGHT MAIL**

April 25, 2019

Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
Attn: Will Jones

**Hunter Smith**  
Landman – West Permian  
600 N. Dairy Ashford  
EC3-07-W336  
Houston, TX 77079-1175  
Tel: 281-206-5651  
[Hunter.A.Smith@ConocoPhillips.com](mailto:Hunter.A.Smith@ConocoPhillips.com)

RE: Application of Solaris Water Midstream, LLC to drill and inject into a SWD well  
Ross Draw SWD 1 Well  
API: 30-015-45239  
Location: Section 27, T26S-R29E, Eddy County, NM

Mr. Jones:

ConocoPhillips Company submitted a protest of the above referenced application of Solaris Water Midstream, LLC in a letter to the NMOCD, dated February 12, 2019. ConocoPhillips Company has since discussed the application in greater detail with Solaris Water Midstream, LLC and decided to withdraw ConocoPhillips Company's protest of Solaris' application.

Please let me know if ConocoPhillips Company needs to take any additional steps to formally withdraw its protest.

Thank you,

A handwritten signature in blue ink, appearing to read "Hunter Smith".

Hunter Smith  
Landman



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February 12, 2019

Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
Attn: Will Jones

RE: Application of Solaris Water Midstream, LLC to drill and inject into a SWD well  
Ross Draw SWD 1 Well  
API: 30-015-45239  
Location: Section 27, T26S-R29E, Eddy County, NM

Mr. Jones:

ConocoPhillips Company protests the above referenced application of Solaris Water Midstream, LLC to drill the Ross Draw 1 SWD well (the “Ross Draw well”) and subsequently inject waste water into the well.

The Ross Draw well is a proposed Devonian SWD well that is located within 500 feet of basement faulting. ConocoPhillips Company is concerned about the risk of commercially disposed waste water communicating with the fault and resulting in induced seismicity. Induced seismicity poses a serious safety risk to personnel, well sites, and equipment in the area.

Approval of the proposed SWD well poses a safety risk due to the Ross Draw well’s potential to generate induced seismicity in a prolific oil and gas region. For this reason, ConocoPhillips recommends denying the request.

Thank you,

Hunter Smith  
Landman

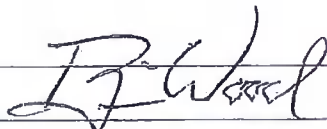
Enclosures

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 XXX Disposal Storage  
Application qualifies for administrative approval? XXX Yes No
- II. OPERATOR: SOLARIS WATER MIDSTREAM, LLC  
ADDRESS: 907 TRADEWINDS BLVD., SUITE B, MIDLAND TX 79706  
CONTACT PARTY: BRIAN WOOD (PERMITS WEST, INC.) PHONE: 505 466-8120
- 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.
- IV. Is this an expansion of an existing project? Yes XXX No  
If yes, give the Division order number authorizing the project: \_\_\_\_\_
- 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.
- 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.
- VII. Attach data on the proposed operation, including:
1. Proposed average and maximum daily rate and volume of fluids to be injected;
  2. Whether the system is open or closed;
  3. Proposed average and maximum injection pressure;
  4. Sources and an appropriate analysis of injection fluid and compatibility with the receiving formation if other than reinjected produced water; and;
  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.).
- Ross Draw SWD 1**  
**30-015-45239**  
**SWD; Devoian-Silurian**
- \*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.
- IX. Describe the proposed stimulation program, if any.
- \*X. Attach appropriate logging and test data on the well. (If well logs have been filed with the Division, they need not be resubmitted).
- \*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.
- 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.
- 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: BRIAN WOOD TITLE: CONSULTANT  
SIGNATURE:  DATE: JAN. 28, 2019  
E-MAIL ADDRESS: brian@permitswest.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

### 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.

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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.