# Initial

# Application

# Part I

Received: <u>08/08/2019</u>

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

RECEIVED: 08/08/2019	REVIEWER:	TYPE: SWD	APP NO: pMAM1922144260

ABOVE THIS TABLE FOR OCD DIVISION USE ONLY



- Geological & Engineer 1220 South St. Francis Drive, Sa  ADMINISTRATIVE APPLICA  THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APP	ring Bureau –  anta Fe, NM 87505  ATION CHECKLIST  PLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND
REGULATIONS WHICH REQUIRE PROCESSING AT  Applicant: AWR Disposal LLC	OGRID Number: 328805
Well Name: Petes SWD #1	API:
Proposed: SWD, Devonian, Fusselman, Montoya	Pool Code: 97869
SUBMIT ACCURATE AND COMPLETE INFORMATION REC	
1) TYPE OF APPLICATION: Check those which apply for A. Location – Spacing Unit – Simultaneous Dedica    NSL  NSP(PROJECT AREA)	
[ II ] Injection – Disposal – Pressure Increase – E	FOR OCD ONLY  pply.  Notice Complete  Application Content Complete  PRM  Application Content Complete  publication is attached, and/or,  submitted with this application for to the best of my knowledge. I also
Note: Statement must be completed by an individual	with managerial and/or supervisory capacity.
	08/08/2019 Date
Randy Hicks (agent)	Date
Print or Type Name	505 238 9515
0 1	Phone Number
Kandul III	
I KINGAN [4]	r@rthicksconsult.com
Signature	e-mail Address

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 Road, Aztec, NM 87410
Phone: (505) 334-6178 Fax: (505) 334-6170
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

Phone: (505) 476-3460 Fax: (505) 476-3462

<sup>1</sup>API Number

# State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION 1220 South St. Francis Dr. Santa Fe, NM 87505

FORM C-102 Revised August 1, 2011 Submit one copy to appropriate District Office

<sup>3</sup>Pool Name

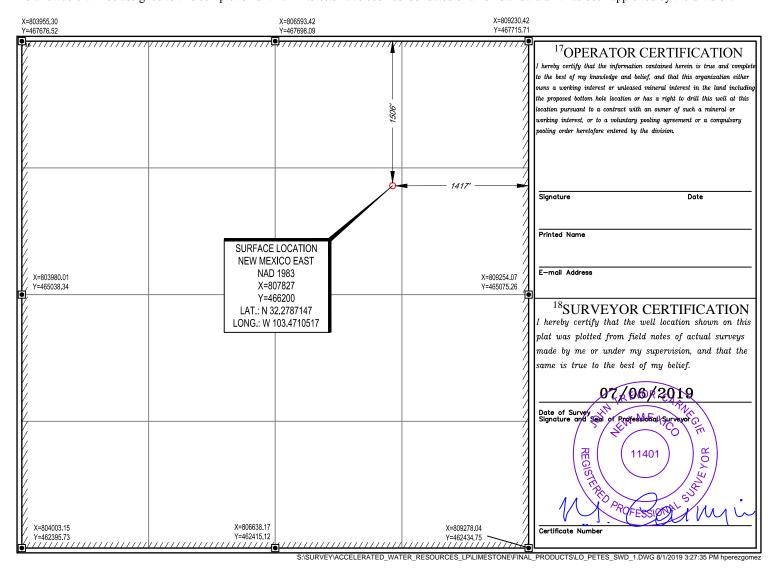
AMENDED	REPORT

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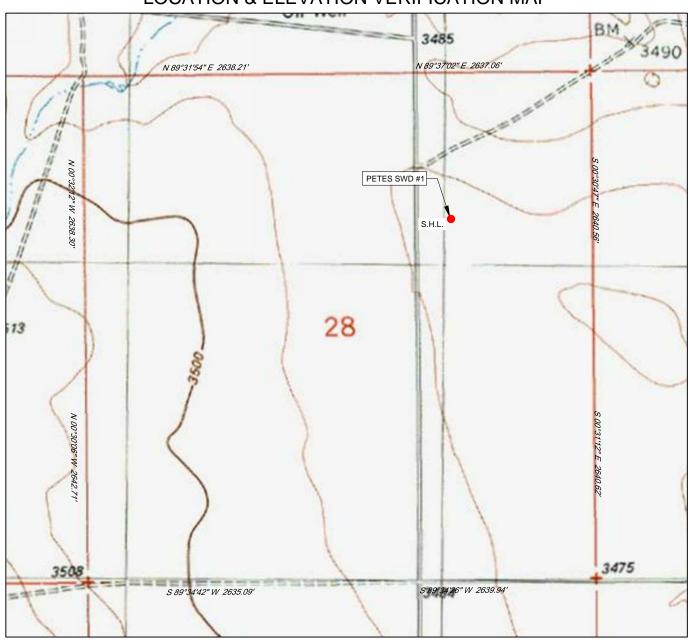
<sup>2</sup>Pool Code

<sup>4</sup> Property Code <sup>5</sup> Property Name									<sup>6</sup> Well Number				
PETES SWD										#1			
<sup>7</sup> OGRID No. <sup>8</sup> Operator Name									9	<sup>9</sup> Elevation			
328805 AWR DISPOSAL, LLC								3480'					
	<sup>10</sup> Surface Location												
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/	West line	County			
G	28	23-S	34-E	_	1506'	NORTH	1417'	EAST	Г	LEA			
			11	Bottom Ho	ole Location If <b>D</b>	Different From Su	rface						
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/	/West line	County			
<sup>12</sup> Dedicated Acres	<sup>13</sup> Joint or 1	Infill 14Co	onsolidation Co	ode 15Ord	ler No.								

No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.



#### LOCATION & ELEVATION VERIFICATION MAP



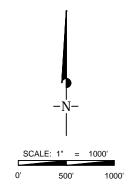
#### AWR DISPOSAL, LLC

 LEASE NAME & WELL NO.:
 PETES SWD #1

 SECTION \_\_28 \_\_TWP \_\_23-S \_\_RGE \_\_34-E \_\_SURVEY \_\_N.M.P.M.
 SURVEY \_\_N.M.P.M.

 COUNTY \_\_\_\_\_LEA \_\_\_STATE \_\_\_NM \_\_\_ELEVATION \_\_3480'
 DESCRIPTION \_\_\_\_\_\_1506' FNL & 1417' FEL

 LATITUDE \_\_\_\_\_N 32.2787147 \_\_\_\_LONGITUDE \_\_\_\_\_\_W 103.4710517

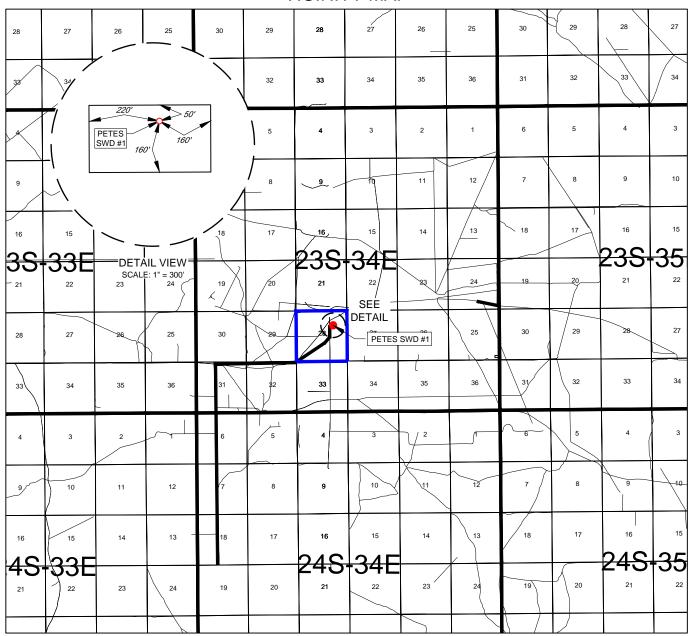


THIS EASEMENT/SERVITUDE LOCATION SHOWN HEREON HAS BEEN SURVEYED ON THE GROUND UNDER MY SUPERVISION AND PREPARED ACCORDING TO THE EVIDENCE FOUND AT THE TIME OF SURVEY, AND DATA PROVIDED BY AWR DISPOSAL, LLC. THIS CERTIFICATION IS MADE AND LIMITED TO THOSE PERSONS OR ENTITIES SHOWN ON THE FACE OF THIS PLAT AND IS NON-TRANSFERABLE. THIS SURVEY IS CERTIFIED FOR THIS TRANSACTION ONLY

ALL BEARINGS, DISTANCES, AND COORDINATE VALUES CONTAINED HEREON ARE GRID BASED UPON THE NEW MEXICO COORDINATE SYSTEM OF 1983, EAST ZONE, U.S. SURVEY FEET.



#### EXHIBIT 2 VICINITY MAP



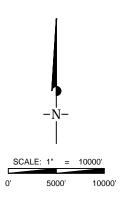
#### AWR DISPOSAL, LLC

#### **DISTANCE & DIRECTION**

FROM INT. OF NM-128 & DELAWARE BASIN RD., GO NORTH ON DELAWARE BASIN RD. ±3.0 MILES, THENCE GO EAST (RIGHT )ON COUNTY RD. 21 ±2.5 MILES, THENCE NORTH (LEFT) ON ANTELOPE RD. ±0.3 MILES, TO A POINT ±390 FEET WEST OF THE LOCATION.

THIS EASEMENT/SERVITUDE LOCATION SHOWN HEREON HAS BEEN SURVEYED ON THE GROUND UNDER MY SUPERVISION AND PREPARED ACCORDING TO THE EVIDENCE FOUND AT THE TIME OF SURVEY, AND DATA PROVIDED BY AWR DISPOSAL, LLC. THIS CERTIFICATION IS MADE AND LIMITED TO THOSE PERSONS OR ENTITIES SHOWN ON THE FACE OF THIS PLAT AND IS NON-TRANSFERABLE. THIS SURVEY IS CERTIFIED FOR THIS TRANSACTION ONLY.

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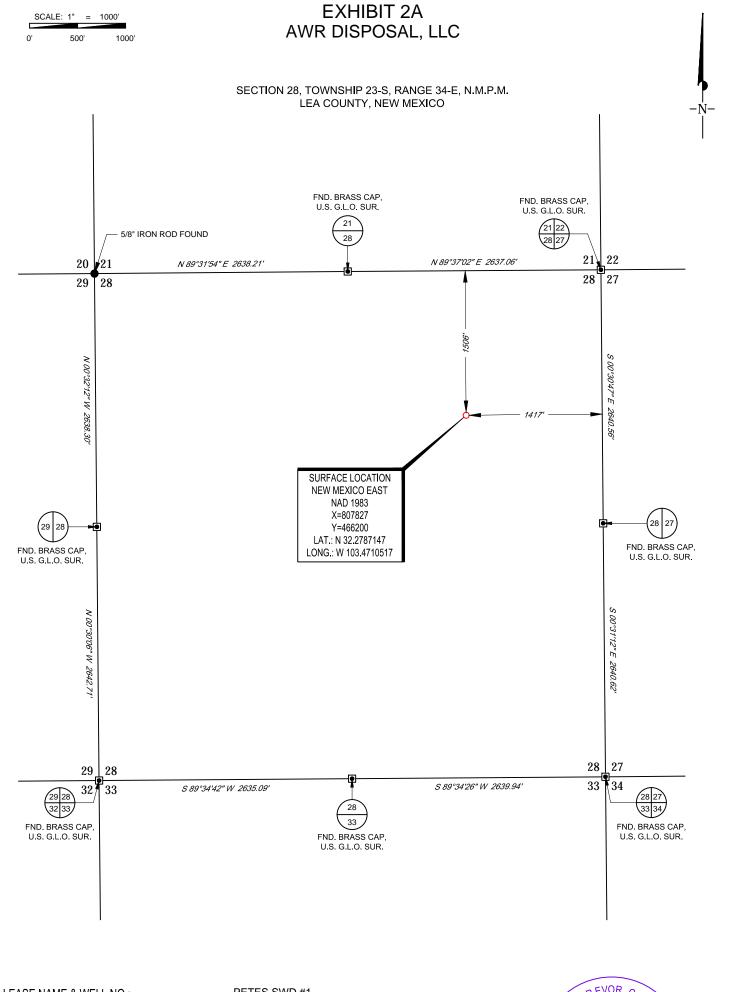
1400 EVERMAN PARKWAY, Ste. 146 • FT. WORTH, TEXAS 76140

TELEPHONE: (817) 744-7512 • FAX (817) 744-7554

2903 NORTH BIG SPRING • MIDLAND, TEXAS 79705

TELEPHONE: (432) 682-1653 OR (800) 767-1653 • FAX (432) 682-1743

WWW.TOPOGRAPHIC.COM



LEASE NAME & WELL NO.: PETES SWD #1

 SECTION
 28
 TWP
 23-S
 RGE
 34-E
 SURVEY
 N.M.P.M.

 COUNTY
 LEA
 STATE
 NM

 DESCRIPTION
 1506' FNL & 1417' FEL

#### **DISTANCE & DIRECTION**

FROM INT. OF NM-128 & DELAWARE BASIN RD., GO NORTH ON DELAWARE
BASIN RD. ±3.0 MILES, THENCE GO EAST (RIGHT )ON COUNTY RD. 21
±2.5 MILES, THENCE NORTH (LEFT) ON ANTELOPE RD. ±0.3 MILES,
TO A POINT ±390 FEET WEST OF THE LOCATION.

ALL BEARINGS, DISTANCES, AND COORDINATE VALUES CONTAINED HEREON ARE GRID BASED UPON THE NEW MEXICO COORDINATE SYSTEM OF 1983, EAST ZONE, U.S. SURVEY FEET.

THIS EASEMENT/SERVITUDE LOCATION SHOWN HEREON HAS BEEN SURVEYED ON THE GROUND UNDER MY SUPERVISION AND PREPARED ACCORDING TO THE EVIDENCE FOUND AT THE TIME OF SURVEY, AND DATA PROVIDED BY AWR DISPOSAL, LLC. THIS CERTIFICATION IS MADE AND LIMITED TO THOSE PERSONS OR ENTITIES SHOWN ON THE FACE OF THIS PLAT AND IS NON-TRANSFERABLE. THIS SURVEY IS CERTIFIED FOR THIS TRANSACTION ONLY.



John Trevor Carnegie, P.S. No. 11401 JULY 31, 2019



LOYALTY INNOVATION LEGACY

1400 EVERMAN PARKWAY, Ste. 146 • FT. WORTH, TEXAS 76140

TELEPHONE: (817) 744-7512 • FAX (817) 744-7554

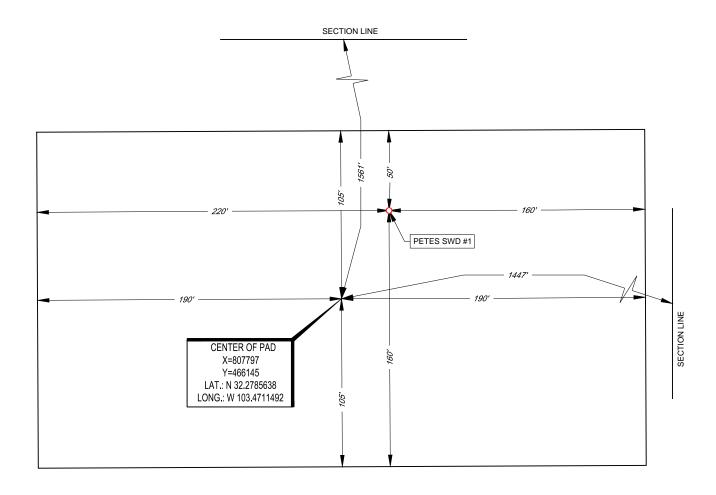
2903 NORTH BIG SPRING • MIDLAND, TEXAS 79705

TELEPHONE: (432) 682-1653 OR (800) 767-1653 • FAX (432) 682-1743

WWW.TOPOGRAPHIC.COM

#### EXHIBIT 2B AWR DISPOSAL, LLC

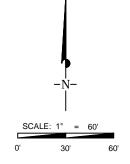
SECTION 28, TOWNSHIP 23-S, RANGE 34-E, N.M.P.M. LEA COUNTY, NEW MEXICO



 LEASE NAME & WELL NO.:
 PETES SWD #1

 #1 LATITUDE
 N 32.2787147
 #1 LONGITUDE
 W 103.4710517

CENTER OF PAD IS 1561' FNL & 1447' FEL



ALL BEARINGS, DISTANCES, AND COORDINATE VALUES CONTAINED HEREON ARE GRID BASED UPON THE NEW MEXICO COORDINATE SYSTEM OF 1983, EAST ZONE, U.S. SURVEY FEET.

THIS PROPOSED PAD SITE LOCATION SHOWN HEREON HAS BEEN SURVEYED ON THE GROUND UNDER MY SUPERVISION AND PREPARED ACCORDING TO THE EVIDENCE FOUND AT THE TIME OF SURVEY, AND DATA PROVIDED BY AWYD ISPOSAL, LLC. THIS CERTIFICATION IS MADE AND LIMITED TO THOSE PERSONS OR ENTITIES SHOWN ON THE FACE OF THIS PLAT AND IS NON-TRANSFERABLE. THIS SURVEY IS CERTIFIED FOR THIS TRANSACTION ONLY.



1400 EVERMAN PARKWAY, Ste. 146 • FT. WORTH, TEXAS 76140

TELEPHONE: (817) 744-7512 • FAX (817) 744-7554

2903 NORTH BIG SPRING • MIDLAND, TEXAS 79705

TELEPHONE: (432) 682-1635 OR (800) 767-1653 • FAX (432) 682-1743

WWW.TOPOGRAPHIC.COM

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:AWR Disposal, LLC
	ADDRESS:3300 N. A Street, Ste 220, Midland, Texas 79705
	CONTACT PARTY:Randall Hicks (agent)PHONE:505 238 9515
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? YesXNo  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:
	<ol> <li>Proposed average and maximum daily rate and volume of fluids to be injected;</li> <li>Whether the system is open or closed;</li> <li>Proposed average and maximum injection pressure;</li> <li>Sources and an appropriate analysis of injection fluid and compatibility with the receiving formation if other than reinjected produced water; and,</li> <li>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.).</li> </ol>
*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.	
	and belief.  NAME: Randall Hicks TITLE: Agent
	NAME: Randall Hicks TITLE: Agent  SIGNATURE: DATE: 08/08/2019  E-MAIL ADDRESS: r@rthicksconsult.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:

#### 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.

#### INJECTION WELL DATA SHEET

_AWR Disposal, LLC				
BER: _PETES SWD #1				
1,506' FNL & 1,417' FEL FOOTAGE LOCATION	G_ UNIT LETTER			34E RANGE
BORE SCHEMATIC				<u>ra</u>
	Hole Size:See a	ttachments	Casing Size:	
	Cemented with:	SX.	or	ft <sup>2</sup>
	Top of Cement:		Method Determine	ed:
		Intermedia	te Casing	
	Hole Size:		Casing Size:	
	Cemented with:	SX.	or	ft <sup>2</sup>
	Top of Cement:		Method Determine	ed:
		Productio	n Casing	
	Hole Size:		Casing Size:	
	Cemented with:	SX.	or	ft <sup>2</sup>
	Top of Cement:		Method Determine	ed:
	Total Depth:			
		Injection	<u>Interval</u>	
		fee	t to	
	BER: _PETES SWD #11,506' FNL & 1,417' FEL FOOTAGE LOCATION	BER: _PETES SWD #1	BER: _PETES SWD #1	WELL CONSTRUCTION DATE   SECTION   TOWNSHIP   SORE SCHEMATIC

(Perforated or Open Hole; indicate which)

#### INJECTION WELL DATA SHEET

Tub	ing Size:	See attachments	Lining Material:
Тур	oe of Packer:		
Pac	ker Setting D	epth:	
Oth	er Type of Tu	ubing/Casing Seal (if appli	cable):
			Additional Data
1.	Is this a new	well drilled for injection?	XNo
	If no, for wh	nat purpose was the well or	iginally drilled?
2.	Name of the	EInjection Formation:	
3.	Name of Fie	eld or Pool (if applicable):	Proposed: SWD, Devonian, Fusselman, Montoya
4.		<u> </u>	ny other zone(s)? List all such perforated sacks of cement or plug(s) used. No
	mici vais and	a give plugging detail, i.e.	sacks of cement of plug(s) used110
5.			gas zones underlying or overlying the proposed chments_

#### **Attachments to C-108**

Copy of well bore diagram

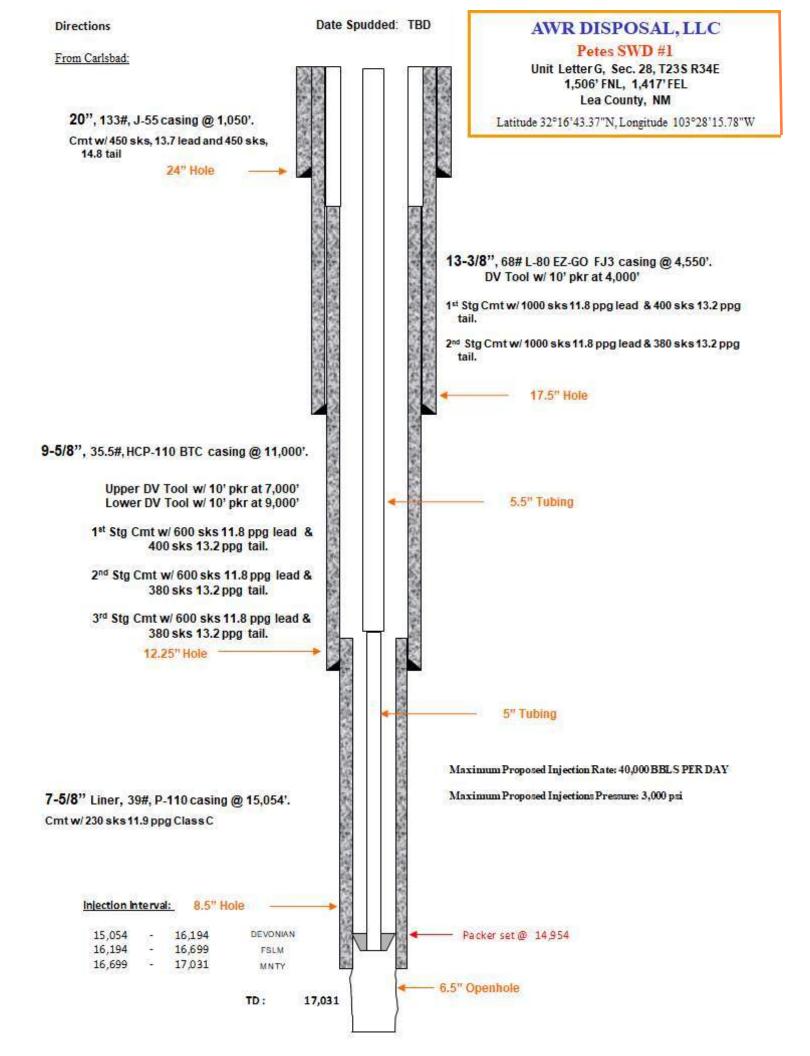
Section III-XII Written descriptions to supplement C-108

Plates referenced in written descriptions

Tables referenced in written descriptions

OSE well logs referenced in written descriptions

Section XIII Proof of Notice



#### 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

Lease Name: Petes SWD #1

Unit Letter G, Section 28, T23S R34E, 1,506' FNL, 1,417' FEL

Limestone Basin Prop Ranch owns the surface upon which the SWD is located.

### 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

The attached Wellbore Data Sheet provides all of the design specifics required and a tabulation of these data are shown on the diagram. The formation tops for the Petes SWD #1 were established by Geologist Herb Wacker TBPG license #4517.

Two logs were used to pick tops for the Petes SWD #1. The Antelope Ridge Unit #2 (30-025-20444) has a total depth of 17,895 and bottoms in the Granite Wash. This well is about 1.8 miles to the south and the Shell Oil Company log calls this well Antelope Ridge Unit #1.

Also employed to pick tops from the shallower interval is another log labeled Antelope Ridge Unit #1 by Shell Oil. This well (25-025-08486) is shown on Table 1 as the Antelope Ridge Unit #1 with a total depth of 14,832 in the Silurian (now commonly called Devonian in NM). This well is 0.9 miles southeast of the proposed SWD.

### 3. A description of the tubing to be used including its size, lining material, and setting depth

5-1/2" (20#) internal plastic coated tubing swaged down to 5" (18#) with setting depth of 14,954'.

AWR 209 Petes Sec28 Twp 23S Rge 34E						
	GL	3480				
Geologist	KB	3510				
H. Wacker	MD	SS				
Dockum	257	3253				
Santa Rosa	282	3228				
Dewey Lake	595	2915				
Rustler	924	2586				
Salt	1291	2219				
Delaware	5107	-1597				
Bell Canyon	5140	-1630				
Cherry Canyon	5940	-2430				
Brushy Canyon	7257	-3747				
Bone Spring	8594	-5084				
Avalon	9019	-5509				
1st Bone Spring	9728	-6218				
2nd Bone Spring	10236	-6726				
3rd Bone Spring	11282	-7772				
Wolfcamp	11632	-8122				
Strawn	12032	-8522				
Atoka	12426	-8916				
Morrow	13074	-9564				
Barnett	13915	-10405				
Miss Limestone	14448	-10938				
Woodford	14799	-11289				
Devonian	15024	-11514				
Fusselman	16194	-12684				
Montoya	16699	-13189				
Simpson	17061	-13551				
·						

Top of Interval	15054'	Devonian +30'				
Bottom of Interval	17031'	Simpson -30'				
TD	17031'					
Thickness of Injection Interval = 1977'						

4. The name, model, and setting depth of the packer used or a description of any other seal system or assembly used

Tryton Tools, 7" Arrow Set 1-X Nickel Plated Injection Packer will be set at 14,954'.

- 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

The proposed injection intervals include the Devonian, Fusselman and Montoya in an open-hole interval.

(2) The injection interval and whether it is perforated or open-hole.

The depth interval of the open-hole injection interval is 17,031-15,054 (1,977 feet).

(3) State if the well was drilled for injection or, if not, the original purpose of the well.

The well will be drilled for disposal.

(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

There are no perforated intervals, only the open-hole completion described above.

(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.

Overlying Oil & Gas Zone (Using GL of 3,480'):

Cherry Canyon	6032
Brushy Canyon	7378
Bone Spring	8503
Avalon	8828
1st Bone Spring	9615
2nd Bone Spring	10136
3rd Bone Spring	11040
Wolfcamp	11332
Strawn	11761
Atoka	12061
Morrow	12783

#### **Underlying Oil & Gas Zones:**

The data on Table 1 show four wells that currently or formerly produced gas from the Devonian.

#### IV. Is this an expansion of an existing 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

Plate 1a identifies all OCD listed wells and API numbers and shows circles with radii of 0.5, 1.0, and 2.0 miles. Note that where numerous wells are closely spaced, the API number may not be labeled for clarity. New wells, active wells, plugged wells, and canceled wells have color-coded symbols. Plate 1b shows only new and active wells and circles with radii of 0.5 and 1.0 miles.

Plate 2 identifies the leases within 2-miles of the proposed SWD as well as leases within the 1-mile area of review.

- Plate 2a presents the lease numbers for the SLO and BLM oil and gas leases. Also shown is mineral rights owned by the U.S. that are unleased at this time.
- Plate 2b presents land ownership for the same area and identifies the oil and gas mineral rights ownership.

Table 1 and Table 2 identify all affected persons within the 1 mile area of review

- Table 1 lists all of the Oil and Gas Well Operators shown on Plate 1a within the circle having a 1.0 mile radius.
- Table 2 lists all leasees, leassors/mineral interests and surface owners (affected persons) within the 1-mile AOR presented on Plate 2a.
- 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

Careful examination of Plate 1a and Table 1 demonstrates that no wells penetrate the injection zone within the 1-mile AOR.

#### VII. Attach data on the proposed operation, including:

1. Proposed average and maximum daily rate and volume of fluids to be injected

Proposed Maximum Injection Rate: 40,000 bbl/day Proposed Average Injection Rate: 30,000 bbl/day

#### 2. Whether the system is open or closed

This is will be an open system. All AWR Disposal, LLC SWDs may receive produced water from recycling storage facilities, such as in-ground containments or above-ground steel-walled containments, which are registered or permitted under Rule 34.

#### 3. Proposed average and maximum injection pressure

Proposed Maximum Injection Pressure: 3,000 psi Proposed Average Injection Rate: 2,000 psi

## 4. Sources and an appropriate analysis of injection fluid and compatibility with the receiving formation if other than reinjected produced water

The attached Table 3 "Produced Water Chemistry of Nearby Wells" provides the requisite analyses. The Delaware and Bone Spring Formations are the subjects of the analyses. These formations and the Wolfcamp will provide most of the produced water to the proposed SWD. At the time of writing, we are unaware of any problems associated with disposal of produced water derived from any Formations into the Devonian, Fusselman and Montoya injection zone.

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.).

Table 4 presents formational water quality data from the Go-Tech site for Devonian-Fusselman-Montoya producing wells. As stated above, we are unaware of any problems associated with disposal of produced water derived from the Delaware, Avalon, Bone Spring, and Wolfcamp Formations into the Devonian, Fusselman and Montoya injection zone.

## \*VIII. Attach appropriate geologic data on the injection zone including appropriate lithologic detail, geologic name, thickness, and depth.

The proposed injection intervals include the Devonian, Fusselman and Montoya in an open-hole interval. The proposed injection intervals in the Pre-Mississippian Carbonates are well cemented and will provide the necessary open hole integrity while allowing salt water to be injected. Because of the competency of the rock, the open hole section has very little chance of collapsing.

As indicated in Section III.A.2, the approximate depths to the top of the Devonian and the base of the Montoya are 15,024 and 17,061 respectively. The depth interval of the injection interval is 17,031-15,054 (1,977 feet), within the Devonian, Fusselman and Montoya Formations.

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.

The Rustler Formation and the Chinle Formation yield water to supply wells in southeastern Eddy County and southwestern Lea County. In the immediate area of the Petes SWD #1, the closest water well (well CP-1618) is associated with an abandoned stock tank and corral, about 1.25 miles to the northeast of the Petes SWD #1 site (Plate 3b). In March of 1996, a depth to water of 282.2 feet was measured by the USGS for a well at or near this same location. The well log for CP-1618 indicates a static water level of 180 feet from sandstone and gravel at depths of 140-240 feet. The total depth of well CP-1618 is 240 feet.

In this area of Lea County, the Chinle yields water to wells from 100-200 feet below the ground surface (bgs) to a depth of about 600 feet. The upper portion of the Rustler Formation yields fresh water to wells in Eddy County and in the area of the Petes SWD #1, the depth interval of this potential source of fresh water is about 924-1150 feet. Based upon investigation of the area by Hicks Consultants, we conclude most water supply wells are completed in the Chinle or Santa Rosa at depth of less than 1000 feet.

The locations of all water supply wells listed in public databases are shown in Plate 3b. There are no water supply wells within the 1-mile AOR.

Plate 4 displays mapped surface water bodies near the proposed SWD.

#### IX. Describe the proposed stimulation program, if any

A cleanup acid job may be used to remove mud and drill cuttings from the formation. However, no other formation stimulation is currently planned.

### \*X. Attach appropriate logging and test data on the well. (If well logs have been filed with the Division, they need not be resubmitted)

Logs will be submitted to OCD upon completion of the well.

#### \*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

No active water supply wells with water chemistry data were identified within one mile of the proposed SWD. Data from various sources permit a conclusion that groundwater within the Chinle Formation is potable. In this area, groundwater in the underlying Rustler formation may be relatively brackish.

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

Randall T. Hicks, a Professional Geologist with decades of experience in hydrogeology, affirms, on behalf of AWR Disposal, LLC, that

- The USGS has mapped quaternary faults in New Mexico and no such faults are mapped in the area of the proposed Petes SWD #1<sup>1</sup>
- The Texas Bureau of Economic Geology has mapped older faults (e.g. basement and Woodford) in New Mexico and the closest mapped basement/Woodford fault is essentially con-incident with the proposed SWD location<sup>2</sup>
- With respect to migration of produced water from the injection zone to underground sources of drinking water via faults or other natural conduits, the following conditions were considered
  - The lowest underground source of drinking water is the middle and upper Rustler Formation.
  - More than 10,000 feet of sedimentary rock separates the bottom of the Rustler Formation and the top of the injection zone. Many of the formations that lie between the injection zone and the lowermost aquifer are permeable and contain oil, gas or water at various pressures. Any excursion of injected fluids from the Devonian disposal zone would undoubtedly enter these permeable formations prior to moving into the Rustler Formation.
  - There is no evidence that the pressure regime in the oil and gas reservoirs is sufficient to cause the upward migration of formation water through the bedded salt and into the Rustler or Chinle aquifers.
- There is no evidence of open faults or any other hydrologic connection between the disposal zone and any underground sources of drinking water

<sup>&</sup>lt;sup>1</sup> https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6o38b3a1684561a9boaadf88412fcf

<sup>&</sup>lt;sup>2</sup> Bureau of Economic Geology (Accessed April 2019). University of Texas at Austin. Basement Faults (Ewing 1990, Tectonic Map of Texas); Precambrian Faults (Frenzel et al. 1988, Figure 6); Woodord Faults (Comer 1991, plate 1). <a href="http://www.beg.utexas.edu/resprog/permianbasin/gis.htm">http://www.beg.utexas.edu/resprog/permianbasin/gis.htm</a>

#### **Plates**

Plate 1	OCD wells within the area of review
Plate 2	Mineral leases within the area of review
Plate 3	Water supply wells within the area of review
Plate 4	Surface water within the area of review

