SWD

Initial

Application

Received: 09/18/19

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

B9M1Y-190918-C-1080

RECEIVED: 09/18/19	REVIEWER:	TYF	SWD	APP NO: pLE	EL1926234755
		I CO OIL CO gical & Engi	neering Bur	N DIVISION eau –	CONTRACTOR MENTION
	KLIST IS MANDATORY FOR REGULATIONS WHICH			ON LEVEL IN SANTA FI	E
Applicant: Trove Energy) Number: <u>372488</u>
Well Name: WLC Sou		.4			-025-xxxx
Pool: Proposed: SWD; De	vonian-Silurian			Pool C	ode: <u>97869</u>
 TYPE OF APPLICAT A. Location – Sr □NSL B. Check one of [1] Commin □DH 	TON: Check those bacing Unit – Simu NSP only for [1] or [11] gling – Storage – C □CTB □ a – Disposal – Pres	INDICAT e which app ultaneous De (project area) Measureme (PLC PC	Predication NSP(PROF		У
B. Royalty, c C. Application D. Notification E. Notification F. Surface c	erators or lease hoverriding royalty on requires publis on and/or concu on and/or concu wner he above, proof	olders owners, reve hed notice rrent approv rrent approv	al by SLO al by BLM	ation is attach	FOR OCD ONLY Notice Complete

3) CERTIFICATION: I hereby certify that the information submitted with this application for administrative approval is accurate and complete to the best of my knowledge. I also understand that no action will be taken on this application until the required information and notifications are submitted to the Division.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

Ben Stone

Print or Type Name

9/18/2019

Date

903-488-9850

Phone Number

<u>Sen Som</u> Signature

ben@sosconsulting.us e-mail Address



September 18, 2019

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

Attn: Ms. Adrienne Sandoval, Director

Re: Application of Trove Energy and Water, LLC to permit for salt water disposal the proposed WLC South Federal SWD No.4, located in Section 24, Township 26 South, Range 33 East, NMPM, Lea County, New Mexico.

Dear Ms. Sandoval,

Please find the enclosed form C-108 Application for Authority to Inject, supporting the above-referenced request for salt water disposal. The well will be operated as a commercial endeavor offering operators in the area additional options for produced water disposal.

Trove Energy and Water is a developing salt water disposal services to operators in southeast New Mexico and seeks to optimize efficiency, both economically and operationally, of all its operations. Approval of this application is consistent with that goal as well as the NMOCD's mission of preventing waste and protection of correlative rights.

This application for a proposed Devonian SWD interval includes the currently mandated increased One-Mile Area of Review including pertinent and available seismic information for the area and region. Published legal notice ran September 15, 2019 in the Hobbs News-Sun and all offset operators and other affected parties have been notified individually. The legal notice affidavit is included with this application. The application also includes a wellbore schematic, area of review maps, affected party plat and other required information for a complete Form C-108. The well is located on federal surface and minerals and the Bureau of Land Management CFO and offset operators have been notified of this application. Finally, this is Trove's first C-108 for administrative processing with the large tubing configuration as an element of the initial application.

I respectfully request that the approval of this salt water disposal well proceed swiftly and if you or your staff requires additional information or has any questions, please do not hesitate to call or email me.

Best regards,

Ben Stone, Partner SOS Consulting, LLC Agent for Trove Energy and Water, LLC

Cc: Application attachment and file

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

APPLICATION FOR AUTHORIZATION TO INJECT

- I. PURPOSE: Salt Water Disposal and the application QUALIFIES for administrative approval.
- II. OPERATOR: Trove Energy and Water, LLC ADDRESS: 1919 North Turner, Hobbs, NM 88240

CONTACT PARTY: Agent: SOS Consulting, LLC – Ben Stone (903) 488-9850

- III. WELL DATA: All well data and applicable wellbore diagrams are ATTACHED.
- IV. This is not an expansion of an existing project.
- V. A map is attached that identifies all wells and leases within two miles of any proposed injection well with a ONE-Mile radius circle drawn around each proposed injection well. This circle identifies the well's area of review.
- *VI. A tabulation is attached of data on all wells of public record within the area of review which penetrate the proposed injection zone. *There are NO (0) Wells in the subject AOR which Penetrate the proposed Devonian interval.* The data includes a description of each well's type, construction, date drilled, location, depth, and a schematic of any plugged well illustrating all plugging detail. *NO P&A Wells penetrate.*
- VII. The following data is ATTACHED 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.).
- *VIII. Appropriate geologic data on the injection zone is ATTACHED 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. Stimulation program a conventional acid job may be performed to clean and open the formation.
- *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 Logs will be filed with OCD.*
- *XI. There are NO water wells/ PODs within one mile of the proposed salt water disposal well. Representative analyses are ATTACHED.
- XII. An affirmative statement is ATTACHED that available geologic and engineering data has been examined and no evidence was found of open faults or any other hydrologic connection between the disposal zone and any underground sources of drinking water.
- XIII. "Proof of Notice" section on the next page of this form has been completed and ATTACHED. There are 3 offset lessees and/or mineral owners within 1 mile and state and federal minerals all have been noticed. Well location is Federal.
- 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:	Ben Stone	TITLE: SOS Consulting, LLC agent for Trove Energy a	nd Water, I	LLC
SIGNATURE	- La	June	DATE:	9/18/2019

E-MAIL ADDRESS: ben@sosconsulting.us

* 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:

FORM C-108 – APPLICATION FOR AUTHORIZATION TO INJECT (cont.)

- III. WELL DATA The following information and data is included (See ATTACHED Wellbore Schematic):
- 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 pursuant to the following criteria is ATTACHED.

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.

C-108 - Items III, IV, V

Item III - Subject Well Data

Wellbore Diagram – PROPOSED Upsized Tubing Configuration; Supporting Info

Item IV – Tabulation of AOR Wells

NO wells penetrate the proposed injection interval.

Item V – Area of Review Maps

1. Two Mile AOR Map with One-Mile Fresh Water Well Radius

2. One-Half Mile AOR Map

All Above Exhibits follow this page.

WELL SCHEMATIC - PROPOSED WLC South Federal SWD Well No.4



API 30-025-XXXX 1170' FNL & 150' FEL, SEC. 24-T26S-R33E LEA COUNTY, NEW MEXICO SWD; Devonian-Silurian (97869) Spud Date: 3/01/2020 SWD Config Dt: 4/15/2020

Injection Pressure Regulated and Volumes Reported Generalized Tops Annulus Monitored 3486 psi Max. Surface (0.2 psi per foot) ė via Remote Telemetery RS Pro Lateral & Vertical Earthquake Monitor with Accelerometer (or better) 1050 RSTLR: 1000 1000 Surface Casing 20.0", 94.0# J-55 Csg. (26.0" Hole) @ 1050' 1600 sx - Circulated to Surface - 2000 名以上にないたう - 3000 のことのことの言語 Intermediate Casing - 4000 13.375", 68.0# Csg. (17.5" Hole) @ 5000' 3200 sx - Circulated to Surface B/SLT: 4600 DEL: 4950 5000 5000 Trove Energy & Water, LLC 6000 CHRY CN: 6050 Drill and set casing as designed w/ all strings cemented to surface. Run CBL or better for cement evaluation and tops. Install 7.625" liner @ ~17,430 w/ 475 sx to TOL. 7000 Drill 6.5" openhole to approx. 18,710' TD w/ mudlog for **Annulus Loaded** interval/ formation verification. Run Triple Combo or minimum RS-DN-CNL-G/R (TBD) - Acidize formation w/ 15% HCl. w/ Inert Packer Fluid 8000 Run 7.0" (5.5" FJ inside liner) Duolined injection TBG on PKR (Inconel nickel-plated or equivalent) set at 17,330'.+ and test. Run injectivity tests and record bottomhole pressure mid-interval. Conduct OCD witnessed MIT. Install Seismic Monitoring Equip. BN SPRG: 8980' 9000 Well ready for injection upon completion of surface facilities. Activate SCADA system monitoring and control. - 10000 Production Casing 11000 9.625", 53.5# P-110 Csg. (12.25" Hole) @ 13100' 3400 sx - Staged; Circulate to Surface 3rd BN SPRG: 11750 (DV @ 7800') 12000 WLFC: 12250' TOL @ 12900' 13100' 13000 Split String Tubing Transition ~12780 STRWN: 14180 - 14000 7.0" Tubing w/ 5.5" Flush Joint inside liner IPC Tubing set in PKR ~17,330' (Within 100' of Uppermost Disposal Interval) ATKA: 14900' - 15000 BRNTT: 15500 16000 Liner Casing 7.625", 39.0# P-110 Csg (8.5" Hole) 12900' to 17,430' MISS: 16600' 475 sx Cls H - TOC @ Top of LNR 17000 WDFD SH: 17050 17,430 DEV: 17430 18000 6.5" Openhole Interval: 17.430' to 18.710' (Maximum) FUSS: 18600 DTD @ 18,710'



Subject Well Data

Trove Energy and Water, LLC

Supporting Information for INCREASED TUBING SIZE

Justification

Anticipated Need for Disposal Capacity

Daily produced water will INCREASE annually and by 2025, expectations are for an additional 1.1 million barrels per day *over current volumes*. It is estimated that 50 new SWDs need to be brought online in the Delaware Basin every year to meet the demand.

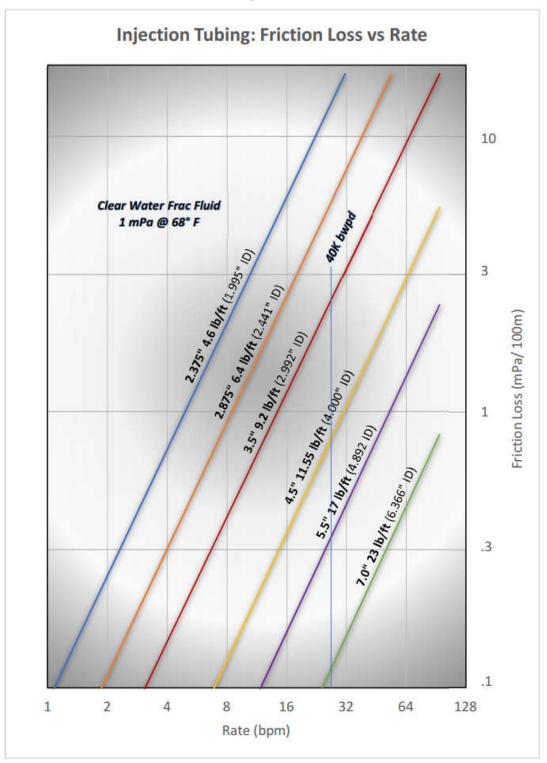
More Capacity – Fewer Wells – Increased Safety

Going from currently approved 5 ½-inch tubing strings to a full 7-inch string (5 ½" inside liner only) reduces friction by 300%; if upsizing from a 4 ½-inch string, friction is reduced by nearly 1000%. In any case, this allows operators to achieve the 40K to 50K bpd daily volumes with less horsepower and minimizing stress-induced mechanical failures from the tank battery, through the pump system and manifolds, to the well head and downhole. Lowering the chance for mechanical failure also enhances personnel safety. *(See All Figures.)*

Larger Tubing Just Makes Sense for Today's Requirements

The risk of having to fish large diameter tubing from liner with close tolerance is challenging but, it has previously been well documented to the NMOCD that it can and has been performed successfully in many scenarios. Fishing tool companies have the tools to perform these jobs should the need arise. Some fishing jobs are tricky to be sure however; a sequence of events for $5 \frac{1}{2}$ " tubing to be dropped inside a $7 \frac{5}{8}$ " liner is rare – the benefits far outweigh the risks.

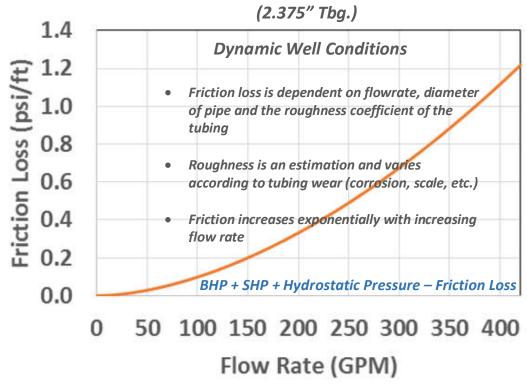
Figure 1



Following the 40K bwpd line, it is apparent that attempting to obtain this rate even with 3.5" tubing is unrealistic – equipment failures occur.
The 7.0 tubing offers minimal friction loss thereby allowing increased rates downhole and less impact to equipment. A comfortable rate for 3.5" might be about 6.5 bpm or, less than 10K bwpd as an example.

Figure 2 Friction Loss Curve

SHP or WHP = Pump Pressure



Bourgoyne, Millhelm, Chenevert, Young, Applied Drilling Engineering, 1991

Figure 3

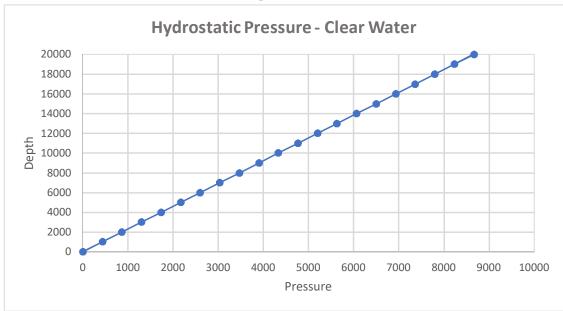
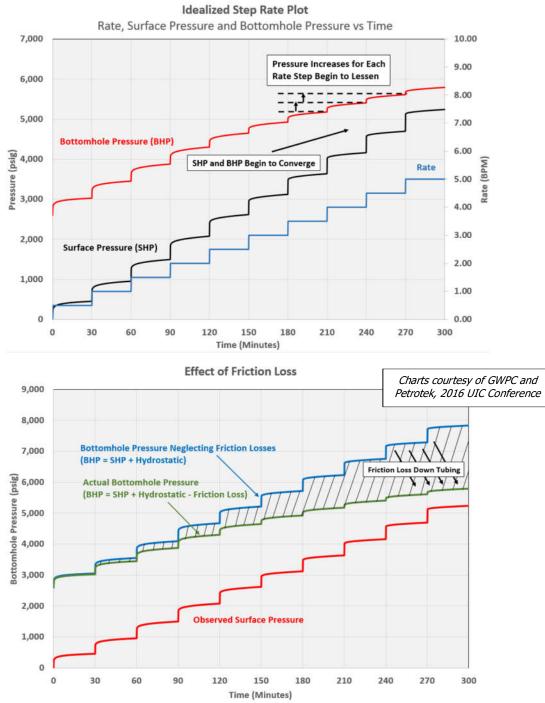


Figure 4





The above charts are theoretical *(shallow/2.375" TBG)* but clearly depict the relationship between surface and bottomhole pressures; the top chart compares to rate and the bottom chart to friction loss. As shown in *Figure 1*, increasing tubing size reduces friction allowing a greater rate to reach the intended disposal interval and by using less horsepower.

Tubing Configuration Inside Liner

The larger 7" casing is run to within 3 joints of the liner-top so the reduced friction benefits are realized. Then, to get to the packer setting depth (within 100 feet of the liner shoe; top of openhole interval) the tubing is swaged and reduced to the final 2,000 to 4000 feet. Friction goes up but, the shorter final length keeps it manageable while delivering the needed volumes. *(See Large Figure – Trove Generic Proposed Well Schematic)*

5.5" 17.0#	OD	ID	Drift	Lined ID	Flare Drift
HCP-110 FJ					
	5.500	4.982	4.767	4.520	4.275
				Wall Thicknoss	5.5″ FJ
				Wall Thickness	Clearance
7.625″ 39.0#	7.625	6.625	6.500	0.500	1.125
P-110 Liner					

Specs – Tubing Inside Liner

Fishing Procedures

A 6.625" O.D. <u>Bowen Series 150 overshot</u> (Assembly 8625) with a spiral grapple or equivalent would be utilized to perform an overshot operation. (Note: The 6.625" O.D. will be turned down to 6.500" O.D. prior to commencing operation.) Details on the overshot are shown below.

					le Diameters		
Complete Assembly Ref.	0588	0593	0638	0651	0662	0663	0687
with Spiral Parts	C5171	5737	6655	4773	C4825	8625	C5174
Туре	SH	FS	SH	SH	FS	SH	FS
Maximum Catch Size (Spiral)	5"	4.5/8"	5.1/4"	5.3/8"	5"	5.1/2"	5.1/4"
Maximum Catch Size (Basket)	4.1/2"	4"	4.5/8"	4.3/4"	4.1/4"	4.7/8"	4.1/2"
Assembly Weight (lbs.)	140	150	176	182	192	185	211
Overshot O/Dia.	5.7/8"	5.15/16"	6.3/8"	6.1/2"	6.5/8"	6.5/8"	6.7/8"
Top Sub	0588.1	0593.1	0638.1	0651.1	0662.1	0663.1	0687.1
-	A5172	5738	6656	4774	B4826	8626	A5175
Bowl	0588.2	0593.2	0638.2	0651.2	0662.2	0663.2	0687.2
	B5173	5735	4503	9205	B4827	8617	B4519
Standard Guide	0588.3	0593.3	0638.3	0651.3	0662.3	0663.3	0687.3
	B4371	192	4504	4775	L1074	8621	A4474
Spiral Grapple	0588.4	0593.4	0638.4	0651.4	0662.4	0663.4	0687.4
	B4369	196	4498	9207	M1071	8619	B4472
Spiral Grapple Control	0588.5	0593.5	0638.5	0651.5	0662.5	0663.5	0687.5
	B4370	193	4499	9208	M1072	8620	A4473
Packer	0588.6	0593.6	0638.6	0651.6	0662.6	0663.6	0687.6
	L5950	195	4505	9209	L4505	8618	B4520
Basket Grapple	0588.7	0593.7	0638.7	0651.7	0662.7	0663.7	0687.7
	B4369	196	4498	9207	M1071	8619	B4472
Basket Grapple Control	0588.8	0593.8	0638.8	0651.8	0662.8	0663.8	0687.8
	B4370	193	4499	9208	M1072	8620	A4473
Control Packer	0588.9	0593.9	0638.9	0651.9	0662.9	0663.9	0687.9
	L5950R	195R	4505R	9209R	M4505RS	8618R	B4520R
Mill Control Packer	0588.10	0593.10	0638.10	0651.10	0662.10	0663.10	0687.10
	L5950R	195R	4505R	9209R	M4505RS	8618R	B4520R

(Note: Similar fishing tools are available from various manufactures; Bowen is a major manufacturer of many downhole tools and considered a standard.)

Fishing Procedure – Other Circumstances

Connection Break

If dressing is needed, trip in hole with a mill and mill connection to allow for turneddown overshot to be latched onto the body of the tubing. If no milling is required, trip in hole with overshot and latch onto fish. Once latched, pick up string weight and pull to release packer. Once packer is released, trip out of hole with fish.

Tubing Body Break

If dressing is needed, trip in hole with a mill and mill tubing to allow for turned-down overshot to be latched onto the body of the tubing. If no milling is required, trip in hole with turned-down overshot and latch onto fish. Once latched, pick up string weight and pull 1-2 points over hanging weight to release the packer (turn to release depending on model). Once packer is released, trip out of hole with fish. (*Note: Wash pipe and mill may be substituted for dressing-off a break to ensure pipe stabilization and that the casing is not damaged due to milling.*)

Mill Cannot be Used

If an inadequate fishing neck is looking up and a mill cannot be used to dress the fish, a cutting tool may be utilized to cut off the damaged portion of tubing and a spear used to retrieve the cut-off piece. Once the cut-off piece is retrieved, the turned-down overshot may be used to retrieve the fish and release the packer. (Note: If pipe is severely damaged, this procedure may be repeated to retrieve the pipe in sections.)

Spear Fishing Procedure

If a turned-down overshot cannot be used or the fishing neck is inadequate, a spear may be used to spear into the fish. In the case of insert-lined pipe, a smaller spear will be utilized to go inside the insert-liner and retrieve the lining. Once the lining has been removed, trip out of hole and pick up the proper sized spear for the subject pipe. Trip in hole with tubing spear, spear the fish, pick up string weight and pull 1-2 points over hanging weight to release the packer (turn to release depending on model). Trip out of hole with fish and packer assembly.

Abandonment Procedure

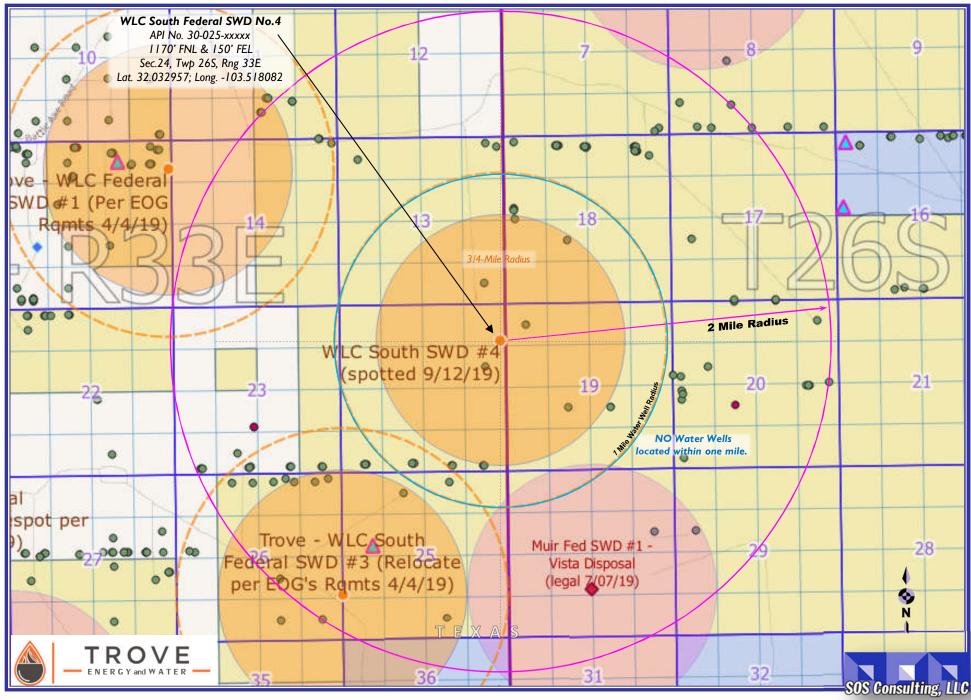
If all attempts to fish fail, the operator may decide to abandon the zone or well. The tubing would be perforated with squeeze holes. A cement retainer or other seal assemble would be set at the top of the pipe and cement pumped to fill the annulus between the tubing and liner. The zone would be abandoned and sealed from fluid migration. The operator may decide to sidetrack from an appropriate depth and retry.

Summary

An increase in tubing size to a 7" x 5.5" (inside liner) for **Trove Energy and Water's** above-mentioned proposed SWDs will likely NOT result in increased potential for seismic activity in the region nor cause mechanical problems in the event tubing must be fished. Upsizing tubing diameters will reduce the number of SWDs required to accommodate the disposal needs of the industry in southeastern New Mexico.

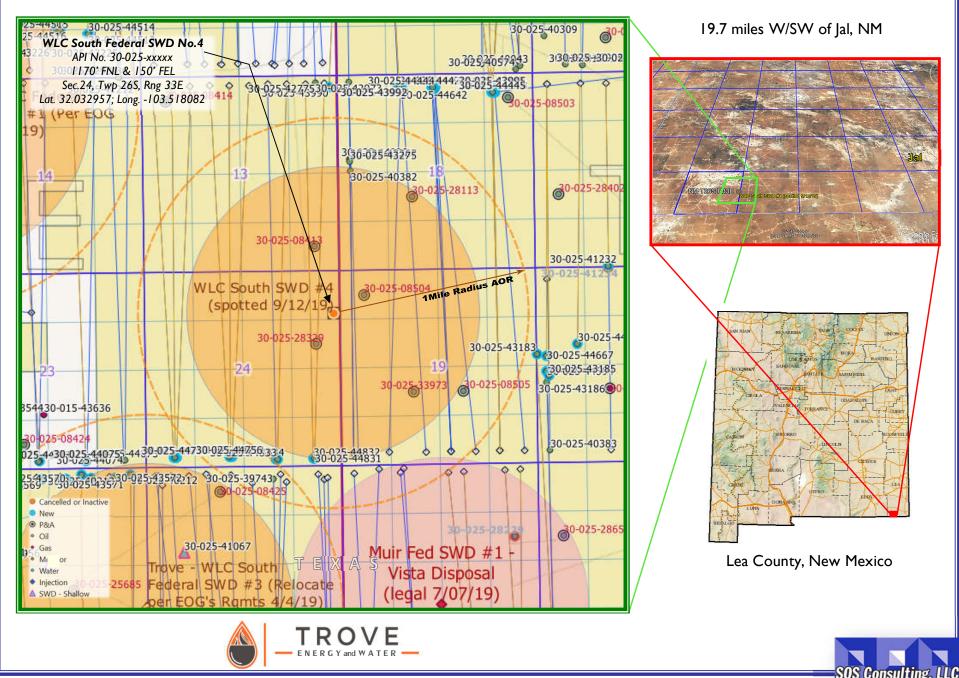
WLC South Federal SWD No.4 - Area of Review / 2 Miles

(Attachment to NMOCD Form C-108 - Item V)



WLC South Federal SWD Well No.4 - One Mile Area of Review / Overview Map =

(Attachment to NMOCD Form C-108, Application for Authority to Inject.)



Area of Review Well Data

THERE ARE NO WELLS WHICH PENETRATE THE PROPOSED DEVONIAN FORMATION IN THE ONE-HALF MILE AREA of REVIEW

C-108 ITEM X

LOGS and AVAILABLE TEST DATA

A Standard Suite of Logs will be run after drilling the well and submitted to the Division.

C-108 ITEM VII – PROPOSED OPERATION

Trove WLC South Federal SWD #4

COMMERCIAL SWD FACILITY

Upon approval of all permits for SWD, operations would begin within 30 days. Completion of the well operations will take approximately 6-8 weeks. Facility construction including installation of the tank battery, berms, plumbing and other and associated equipment would be occurring during the same interval but at a different location from the well. In any event, it is not expected for the facility construction phase of the project to last more than 60 days, depending on availability of contractors and equipment. Facility design is currently in the planning phase with *Elite Infrastructure*, a company which specializes in such construction.

DRILL AND CONFIGURE FOR SALT WATER DISPOSAL

Interval Determination

Prior to commencing disposal, Trove Energy and Water shall submit mudlog and geophysical logs information, to the Division's District geologist and Santa Fe Engineering Bureau, showing evidence agreeable that only the permitted formation is open for disposal including a summary of depths (picks)for contacts of the formations which the Division shall use to amend any order for a final description of the depth for the injection interval. If significant hydrocarbon shows occur while drilling, the operator shall notify Artesia district office and Trove will seek written permission prior to commencing disposal.

Casing and Logging

Trove's design is to circulate all casing strings to surface. If cement does not circulate on any casing string, the Trove will run a cement bond log (CBL) or other log to determine top of cement and shall notify the Artesia district office with the top of cement (emergency phone number if after normal business hours) prior to continuing with any further cement activity with the proposed well. If cement does not tie back in to next higher casing shoe, the operator shall perform remedial cement job(s) to bring cement, at a minimum, 200 feet above the next higher casing shoe. The operator shall run a CBL (or equivalent) for the 7-5/8-inch liner to demonstrate placement cement and the cement bond with the tie-in with 9-5/8-inch casing string. All logs on the well will be copied to the Artesia district office; CBL logs and mudlogs will be provided prior to commencing disposal. Additionally, prior to commencing disposal the operator shall obtain a bottom-hole pressure of the open-hole completion. This information shall be provided with the sundry notice of commencement of disposal operations.

Tubing and Packer

The risk of having to fish large diameter tubing from liner with close tolerance is challenging but, it has previously been well documented to the NMOCD that it can and has been performed successfully in many scenarios. Fishing tool companies have the tools to perform these jobs should the need arise. Some fishing jobs are tricky to be sure however; a sequence of events for 5 ½" tubing to be dropped inside a 7 5/8" liner is rare – the benefits far outweigh the risks. Duolined (or equivalent) injection tubing on (Inconel nickel-plated packer (or equivalent).

C-108 ITEM VII – PROPOSED OPERATION

(continued)

Monitoring and Reporting

Prior to commencing any work, an NOI sundry(ies) will be submitted to configure the well for SWD and will detail the completion workover including all work otherwise described above, any change to the procedure noted herein and to perform mechanical integrity pressure test per OCD test procedures. (Notify NMOCD 24 hours prior.) The casing/tubing annulus will be monitored for communication with injection fluid or loss of casing integrity.

OPERATIONAL SUMMARY

The SWD facility will not be fenced so that trucks may access for load disposal 24/7.

Ultimately, Trove's plans would include tying the SWD into a pipeline, when and if available, so the well and injection equipment will be a closed system and equipped with pressure limiting devices and volume meters. The annulus, loaded with an inert, anti-corrosion packer fluid, will be monitored for pressure.

SCADA System

The facility and tanks will be equipped with telemetry devices and visual alarms to alert the operator and customers of full tanks or an overflow situation. Operational details including rates, pressures, valve, tank and levels will be continually monitored and either controlled remotely or personnel dispatched for further action.

In addition to operational SCADA system control and monitoring, Trove is considering installing RS Pro Lateral & Vertical Earthquake Monitors with Accelerometer, or better for continuous monitoring. Data will be remotely accessible; monitored and shared as needed. An alternative solution being considered would employ a third party to provide seismic monitoring using public and private seismometers as available.

Rates, Pressures, Releases

Anticipated daily maximum volume is 40,000 bpd (an upper limit of 50,000 bpd is assumed) and an average of 22,500 bpd at a maximum surface injection pressure of 3482 psi (.2 psi/ft gradient) – maximum pressure will be adjusted If the top of interval is modified after well logs are run.

Potential releases will be contained and cleaned up immediately. The operator shall repair or otherwise correct the situation within 48 hours before resuming operations. OCD will be notified within 24 hours of any release greater than 5 bbls. If required, remediation will start as soon as practicable. Operator shall comply with 19.15.29 NMAC and 19.15.30 NMAC; as necessary and appropriate and OCD form C-141 will be submitted promptly.

C-108 ITEM VII – PRODUCED WATER ANAYLSES

Item VII.4 – Water Analysis of Source Zone Water

Delaware Bone Spring Wolfcamp

Item VII.5 – Water Analysis of Disposal Zone Water

Devonian

Water Analyses follow this page.

C-108 Item VII.5 - Produced Water Data Trove Energy & Water, LLC - WLC Mid Federal Project Area SOURCE ZONE

DELAWARE

AWARE								Lab ID		
API No	3001510)181						Sample	e ID	5532
Well Name	SUPERI	OR ST	TATE		002			Sample	No	
Location	1 ULSTR	08	25	S 30	Е	Lat / Long	32.14281	8.89616		
	1	1980	S	660	Е			County	Eddy	
Operato	r (when sa	ampleo	d)							
		Field	d	CORRA		I		Unit I		
Sa	mple Date					Analysis Date				
		San	anla S	ource SV	VAB		Depth (if	known)		
			ter Typ				Deptil (il	KIIOWII)		
ph						alkalini	ty_as_caco3_r	maL		
	emp_F						ss_as_caco3_	-		
	ficgravity						ss mgL			
	ficgravity t	emn F	=				ity ohm cm			
tds_n	0 72	.emp_i			155173		ity_ohm_cm_t	emn		
	ngL_180C				155175	conduc		cmp_		
					02820					
	ide_mgL				92820		tivity_temp_F			
	m_mgL						ate_mgL		10	
	um_mgL						nate_mgL		12	
iron_i	•					sulfate			13	3
bariu	m_mgL					hydroxi	de_mgL			
magr	nesium_mg	ιL				h2s_m	gL			
potas	sium_mgL					co2_m	gL			
stron	tium_mgL					o2_mg	L			
mang	ganese_mg	JL				anionre	emarks			
Remarks										



C-108 Item VII.5 - Produced Water Data Trove Energy & Water, LLC - WLC Mid Federal Project Area SOURCE ZONE

Lab ID

BONE SPRING

									Lab ID					
API No	300253	3529								Sample	e ID		6681	
Well Name	THYME		FEDEI	RAL		C)02			Sample	e No			
Location	ULSTR	01	23	s	32	Е		Lat / Long	32.33657	-103	3.62470			
		1650	Ν	10	650	Е		0		County	Lea			
Operator	(whon s	amplo) (h											
Operator	(when a	Fie		RE	D TAI	١K				Unit G				
San	nple Date				/2001			Analysis Date						
								-						
			mple S		е				Depth	(if known)				
		Wa	ater Ty	р										
ph						6	6.1	alkalini	alkalinity_as_caco3_mgL					
ph_ter	mp_F							hardne	ss_as_caco3	3_mgL				
specifi	icgravity					1.	15	hardne	ss_mgL					
specifi	icgravity_	_temp_	F					resistiv	ity_ohm_cm					
tds_m	gL					1728	96	resistiv	ity_ohm_cm	_temp_				
tds_m	gL_180C	;						conduc	tivity					
chloric	de_mgL					1049	76	conduc	tivity_temp_	F				
sodiur	n_mgL							carbon	ate_mgL					
calciu	m_mgL						0	bicarbo	onate_mgL			781		
iron_m	ngL						0	sulfate	_mgL			1150		
barium	n_mgL						0	hydrox	ide_mgL					
magne	esium_m	gL				20	25	h2s_m	gL			0		
potass	sium_mg	L						co2_m	gL					
stronti	ium_mgL							o2_mg	o2_mgL					
manga	anese_m	gL						anionre	anionremarks					
Remarks														



C-108 Item VII.5 - Produced Water Data Trove Energy & Water, LLC - WLC Mid Federal Project Area SOURCE ZONE

Lab ID

WOLFCAMP

								Lab ID						
API No	300250 ⁻	1678							Sample	e ID	5096			
Well Name			TA FE	DEF	RAL U	NIT 001			Sample	e No				
Location	ULSTR	22	22 19 S 33			E	Lat / Long	32.64341	-103					
		1980	S		10	Е	-		County	Lea				
Operator	(whon s	amnlo	d)											
operator	(which of	Fiel		то	NTO				Unit I					
Sar	nple Date						Analysis Date							
			nple S		e DS	Г		Depth (if known)					
		Wa	iter Ty	р										
ph							alkalin							
ph_ter	mp_F						hardne	ess_as_caco3	_mgL					
specif	icgravity						hardne	ess_mgL						
specif	icgravity_	temp_	F				resistiv	vity_ohm_cm						
tds_m	gL					46915	resistiv	vity_ohm_cm_	temp_					
tds_m	gL_180C						conduc	ctivity						
chloric	de_mgL					27270	conduc	ctivity_temp_F	=					
sodiur	n_mgL						carbon	ate_mgL						
calciu	m_mgL						bicarbo	onate_mgL		7	'14			
iron_n	ngL						sulfate	_mgL		11	16			
bariun	n_mgL						hydrox	hydroxide_mgL						
magne	esium_mç	gL					h2s_m	h2s_mgL						
potass	sium_mgL	-					co2_m	co2_mgL						
stronti	ium_mgL						o2_mg	o2_mgL						
manga	anese_mo	gL					anionre	emarks						
Remarks														



C-108 Item VII.5 - Produced Water Data Trove Energy Water, LLC - WLC Mid Federal Project Area

DISPOSAL ZONE

DEVONIAN

/ONIAN								Lab ID					
API No	3002521	082					Sample ID						
Well Name	ANTELC	PE RI	IDGE I	UNIT	003		Sample No						
Location	ULSTR	34	23	S 34	Е	Lat / Long	.46068						
	1	980	S	1650	W			County	Lea				
Operator	(when sai	mpled)										
		Field	d	ANTEL	OPE RIDO	E		Unit K					
Sam	ple Date		1	1/14/196	67	Analysis Date							
		San	nple So	ource U	NKNOWN		Depth (if	known)					
			ter Typ					,					
ph					6.9	alkalinit	alkalinity_as_caco3_mgL						
ph_tem	ıp_F					hardnes	s_as_caco3_n	ngL					
specifi	cgravity					hardnes	ss_mgL						
specifi	cgravity_te	emp_F	:			resistivi	ty_ohm_cm						
tds_ma	μL				80187	resistivi	resistivity_ohm_cm_temp_						
tds_mg	JL_180C					conduct	tivity						
chloride	e_mgL				47900	conduct	tivity_temp_F						
sodium	_mgL					carbona	ate_mgL						
calcium	n_mgL					bicarbo	nate_mgL		47	6			
iron_m	gL					sulfate_	mgL		90	0			
barium	_mgL					hydroxi	de_mgL						
magne	sium_mgL	-				h2s_mç	βL						
potass	ium_mgL					co2_m	gL						
strontiu	ım_mgL					o2_mgl	o2_mgL						
manga	nese_mgL	-				anionre	marks						
Remarks													



Geologic Information

The Devonian and Silurian consist of carbonates including light colored dolomite and chert intervals interspersed with some tight limestone intervals. Several thick sections of porous dolomite capable of taking water are believed present within the subject formations in the area. Depth control data was inferred from deep wells to the south and east. If the base of Devonian and top of Silurian rocks come in as expected the well will only be drilled deep enough for adequate logging rathole.

At a proposed depth of 18,710' BGL (Below Ground Level) the well will TD approximately 1,280' below the estimated top of the Devonian. Mud logging through the interval will ensure the target interval remains in Devonian and Silurian. Once Devonian is determined, the casing shoe depth will be set at an approximate maximum upper depth of 17,430' BGL. Injection will occur through the resulting openhole interval. Should mud or other logs indicate depth adjustment is required to exploit the desired formation as described; sundries with appropriate data will be filed with the OCD.

The Devonian is overlain by the Woodford Shale and Mississippian Lime and underlain by the Middle and Lower Ordovician; Simpson, McKee and Ellenburger.

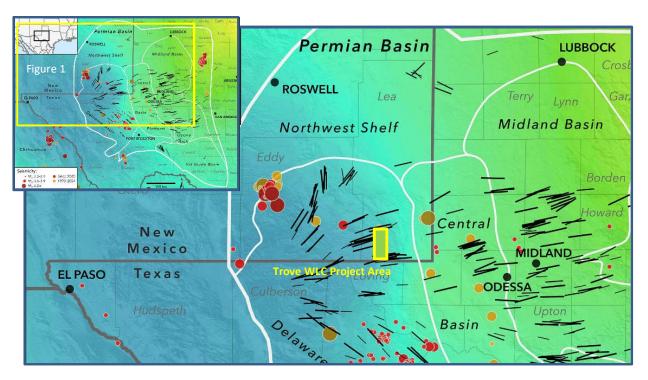
Fresh water in the area is generally available from the Rustler and Santa Rosa formations. State Engineer's records show water wells in the area with a depth to groundwater of 110 to 220 feet and an average depth of 157 feet.

There are NO water wells located within one mile of the proposed SWD.

Geological Data

EARTHQUAKE / SEISMIC INFORMATION SUPPLEMENT

Map Source: <u>State of stress in the Permian Basin, Texas and New Mexico: Implications for induced</u> <u>seismicity (Figure 1)</u>; Jens-Erik Lund Snee/ Mark Zoback, February 2018



TROVE PSE PROJECT VICINITY

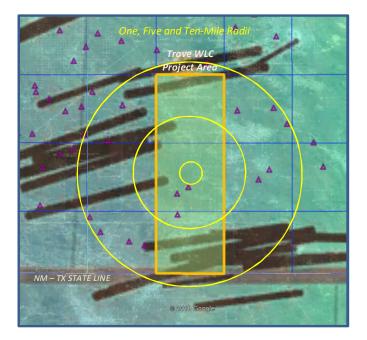


Figure 1. State of stress in the Permian Basin, Texas and New Mexico. Black lines are the measured orientations of the maximum horizontal stress (SHmax), with line length scaled by data quality. The colored background is an interpolation of measured relative principal stress magnitudes (faulting regime) expressed using the A parameter (see text for details) of Simpson (1997). Blue lines are fault traces known to have experienced normalsense offset within the past 1.6 Ma, from the USGS Quaternary Faults and Folds Database (Crone and Wheeler, 2000). The boundary between the Shawnee and Mazatzal basement domains is from Lund et al. (2015), and the Precambrian Grenville Front is from Thomas (2006). The Permian Basin boundary is from the U.S. Energy Information Administration, and the subbasin boundaries are from the Texas Bureau of Economic Geology Permian Basin Geological Synthesis Project. Earthquakes are from the USGS National Earthquake Information Center, the TexNet Seismic Monitoring Program, and Gan and Frohlich (2013). Focal mechanisms are from Saint Louis University (Herrmann et al., 2011).

Geological Data

EARTHQUAKE / SEISMIC INFORMATION SUPPLEMENT (cont.)

In the following map, a layer with USGS historical earthquake data is overlaid and, a layer showing lines to represent Precambrian faults as documented by Ruppel, et al. (2005). Finally, a layer showing all currently permitted SWDs completed or proposed to be completed in the Devonian (Silurian) formation.

The USGS earthquakes shown are well known to the area. The 2012 quake located approximately 13 miles due east of Loving is also shown (22.4 miles). This was perhaps the most significant of the area in recent years but was determined to not be related to oil and gas activity. The best known and largest in recent history was the 1992, 4.6 magnitude quake centered south of Eunice, NM (29.5 miles).

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 Hobbs

 Image: Interview
 Image: Interview

 Image: Interview
 Image: Intervi

The Precambrian faults and existing Devonian SWDs are discussed in more detail on the next page.

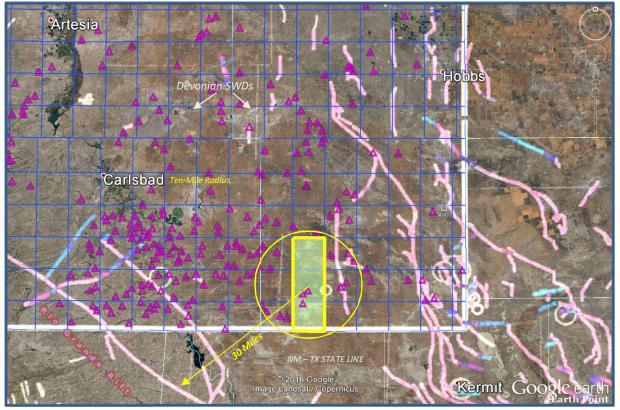
REGIONAL VIEW - DEVONIAN SWD LOCATIONS, PRECAMBRIAN FAULTS, SHmax, USGS MAGNITUDE

Geological Data

EARTHQUAKE / SEISMIC INFORMATION SUPPLEMENT (cont.)

The primary Precambrian faults in the area as documented by Ruppel, et al. (2005) is represented on this map by the thick, pink colored lines. The most significant of these is the fault associated with the Rio Grande Rift, running southeast to northwest and, runs adjacent to a portion of Hwy 285 however; only a small portion the associated fault which runs parallel approximately 15 miles northeast is depicted below. The Trove WLC Project SWD Area is located some 30 miles from the fault. Other documented faults (USGS, 2000) are shown for eastern Lea County and extending into west Texas. Other Devonian SWDs in the area are also shown (small purple triangles) completed or proposed to be completed in the Devonian (Silurian) formation.

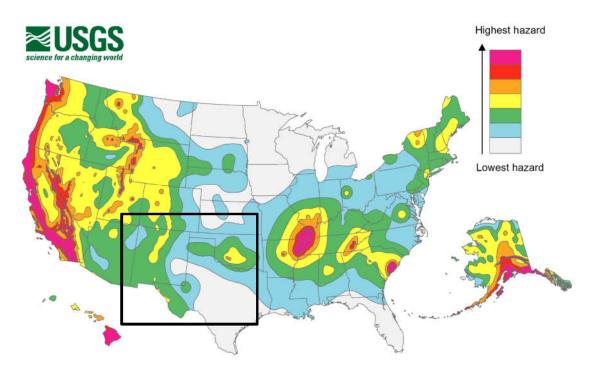
The previously referenced study by Snee and Zoback (shown on previous exhibits) evaluated the strike-slip probability using probabilistic FSP (Fault Slip Potential) analysis of known faults in the Permian Basin. The study predicts that the Precambrian fault shown here has less than a 10% probability of being critically stressed to the point of creating an induced seismicity event. The main reason for the low probability is due to the relationship of the strike of the fault to the regional S_{Hmax} orientation; the proposed SWD being well removed from the area.



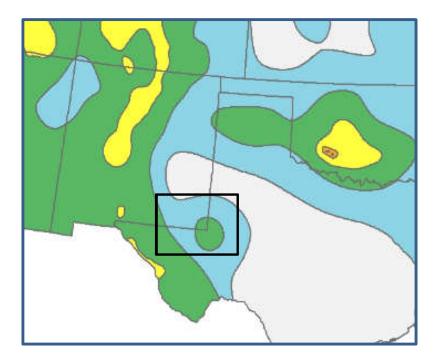
VICINITY - PERMITTED DEVONIAN SWDS, COMPOSITE FAULTS

Geological Data

EARTHQUAKE / SEISMIC INFORMATION SUPPLEMENT (cont.)



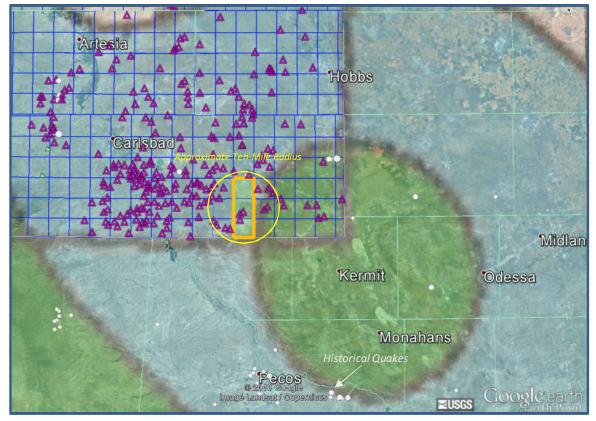
2014 map data: The USGS notes in its report that <u>fracking</u> may be to blame for a sizeable uptick in earthquakes in places like <u>Oklahoma</u>. "Some states have experienced increased seismicity in the past few years that may be associated with human activities such as the disposal of wastewater in deep wells," the report says. USGS hopes to use that data in future maps but it isn't included in this one. "Injection-induced earthquakes are challenging to incorporate into hazard models because they may not behave like natural earthquakes and their rates change based on man-made activities," the report says.



Geological Data

EARTHQUAKE / SEISMIC INFORMATION SUPPLEMENT (cont.)

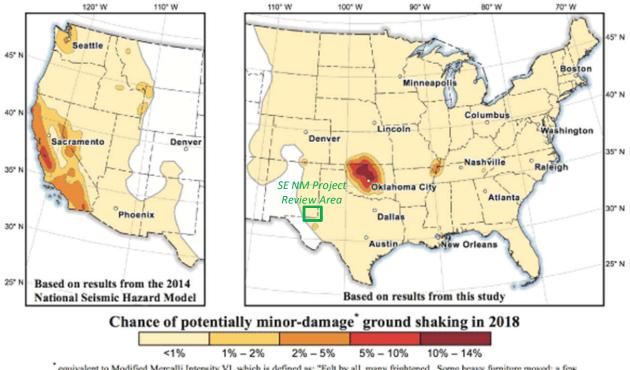
USGS 2014 REGIONAL MAP DATA OVERLAY IN GOOGLE EARTH W/ HISTORICAL EARTHQUAKES



An updated USGS map for 2018 is on the next page. While methodology remained essentially the same according to USGS, the interpreted results and color-coding did have some modification. However, the subject area in southeast New Mexico on both maps remains very low and on the 2018 map, the area is assigned a value of <1% of "potentially minor-damage ground shaking".

C-108 - Item VIII Geological Data

EARTHQUAKE / SEISMIC INFORMATION SUPPLEMENT (cont.)



USGS 2018 ONE-YEAR MODEL

* equivalent to Modified Mercalli Intensity VI, which is defined as: "Felt by all, many frightened. Some heavy furniture moved; a few instances of fallen plaster. Damage slight."

Map showing chance of damage from an earthquake in the Central and Eastern United States during 2018. Percent chances are represented as follows: pale yellow, less than 1 percent; dark yellow, 1 to 2 percent; orange, 2 to 5 percent; red, 5 to 10 percent; dark red, 10 to 12 percent. See Hazard from the western United States from the <u>2014 National Seismic Hazard Maps</u> (Petersen et al., 2014) for comparison.

The USGS has produced the 2018 one-year probabilistic seismic hazard forecast for the central and eastern United States from induced and natural earthquakes. For consistency, the updated 2018 forecast is developed using the same probabilistic seismicity-based methodology as applied in the two previous forecasts.

Based on publicly available data for the subject area, it is reasonable to believe the risk of induced seismic activity due to disposal injection into this well is extremely low.

Trove Energy and Water, LLC

Fault Slip Potential Analysis



4 FSP areas (100 square miles each) centered on townships in southeast New Mexico to cover all proposed Trove SWDs.
Exact geologic conditions of the FSP areas are unknown.
Two scenarios modeled for each FSP area using range of possible geologic conditions based on nearby geophysical logs.
Scenario 1 uses low end of possible geologic conditions.
Scenario 2 uses high end of possible geologic conditions.
Each scenario modeled over 25 years. Stress gradients and pore pressure gradients derived from published papers (Snee and Zoback 2018).
Reference depth, injection interval thickness, porosity, and permeability derived from nearby geophysical logs penetrating the injection interval (New Mexico OCD 2019, see appendix).
One mapped Precambrian fault in the 100 square mile area of review for FSP area 1. No mapped or known sedimentary or Drecambrian faults in the 100 square mile area of review for ESP areas 2, 3, and 4 (LISCS)
sedimentary or Precambrian radius in the too square mile area of review for FSP areas 2, 3, and 4 (USGS 2019 and Wilson 2018).
Additional random faults generated using strike and dip consistent with known New Mexico faults (USGS 2019, Snee and Zoback 2018).
Advanced geological parameters derived from well logs and confirmed with previous expert testimony in the region (Reynolds 2019).

FSP Methodology



Parameters

Value Source	1.1 Snee and Zoback (2018)	75 Snee and Zoback (2018)	16,600-17,500 Well Logs NMOCD (2019)	0.44 Snee and Zoback (2018)	0.7 Snee and Zoback (2018)	0.7 Snee and Zoback (2018)	100-250 Well Logs NMOCD (2019)	5-10 Well Logs NMOCD (2019)	10-100 Well Logs NMOCD (2019)	140 Snee and Zoback (2018)	190 Snee and Zoback (2018)	60 Snee and Zoback (2018)	90 Snee and Zoback (2018)	1000 ALL Research and Reynolds (2019)	0.0003 ALL Research and Reynolds (2019)	4.70E-10 ALL Research and Reynolds (2019)	8.70E-10 ALL Research and Revnolds (2019)
Parameter	Vertical Stress Gradient (psi/ft)	Horizontal Stress Direction (degrees azimuth)	Reference Depth (ft) 16,60	Initial Reservoir Pressure Gradient (psi/ft)	A Phi	Friction Coefficient	Thickness with High Porosity (ft) 10	Porosity (%)	Permeability (mD) 10	Fault Strike Minimum (degrees)	Fault Strike Maximum (degrees)	Fault Dip Minimum (degrees)	Fault Dip Maximum (degrees)	Density (kg/m^3)	Dynamic Viscosity (Pa*s) 0.	Fluid Compressibility (Pa^-1) 4.7	Rock Compressibility (Pa ^A -1) 8.7

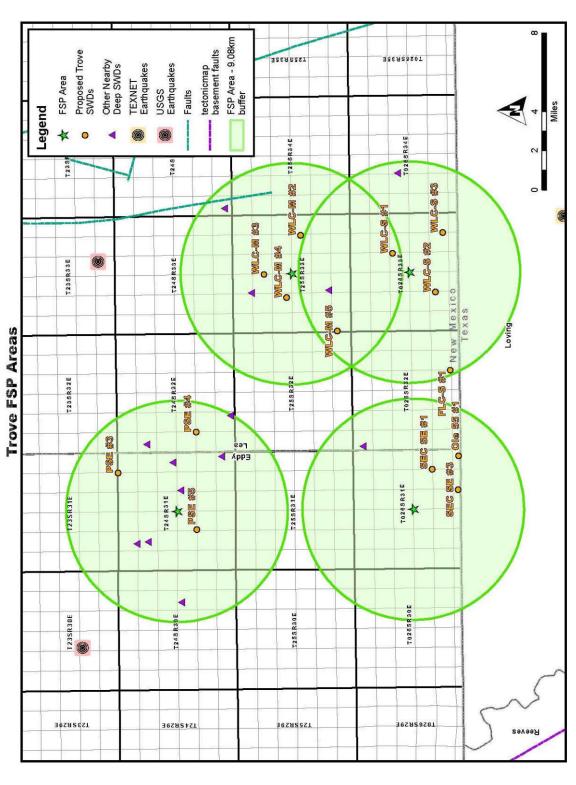


Injection Data

- 13 deep class II injection wells active in 2019 within 4 areas of review (see appendix).
- from injection start-date through April 2019 Monthly average injection rates calculated (see appendix).
- 14 proposed Trove SWDs within 4 areas of review.
- Proposed Trove SWDs assumed to inject at proposed average rate of 40,000 bpd.

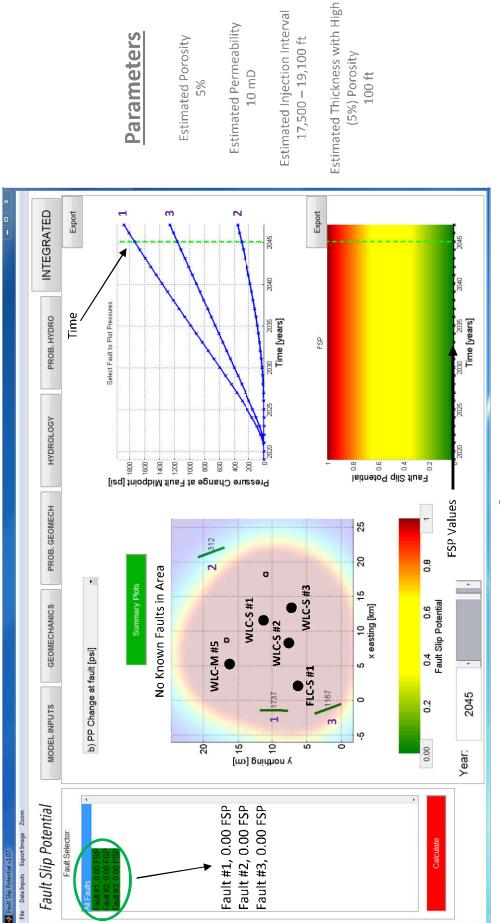






COVERNMENT RELATIONS - ENVIRONMENTAL

FSP After 25 Years - Area 2 - Scenario 1



10 mD

(5%) Porosity

100 ft

= Proposed Trove SWDs

= Other Deep SWDs

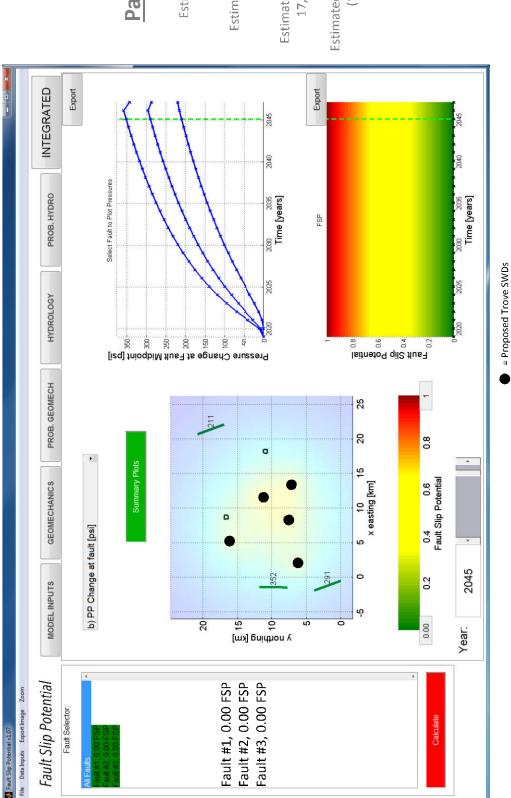
CONSULTING

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FSP After 25 Years - Area 2 - Scenario 2



Parameters

Estimated Porosity 10% Estimated Permeability 100 mD Estimated Injection Interval 17,500 – 19,100 ft Estimated Thickness with High (10%) Porosity 250 ft

= Other Deep SWDs

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S	
U	
Q	
U	

- square mile review of FSP area 1, which shows FSP of There is one mapped Precambrian fault in the 100 0.00 over 25 years in both high and low geologic scenarios.
- Known faults in southeast New Mexico do not align with the horizontal stress field, and are not likely to slip.
- that are likely overestimated, shows no risk of potential FSP modeling through 25 years, with injection rates fault slip in the areas of review.
 - These areas present little to no risk for injection induced seismicity.



U.S. Geological Survey. "Information by Region-New Mexico." <u>https://earthquake.usgs.gov/earthquakes/byregion/newmexico.php</u> (Accessed June 24, 2019)
U.S. Geological Survey. "Faults." <u>https://earthquake.usgs.gov/hazards/qfaults/</u> (Accessed June 24, 2019)
EMNRD Oil Conservation Division. "Welcome to the New Mexico Mining & Minerals Division." http://www.emnrd.state.nm.us/OCD/ocdonline.html (Accessed July 19, 2019)
Snee, Jens-Erik Lund, and Mark D. Zoback. 2018. "State of Stress in the Permian Basin, Texas and New Mexico: Implications for Induced Seismicity." <i>The Leading Edge</i> 37, no. 2 (February 2018): 127-34.
Wilson, Scott J. 2018. "Affidavit of Scott J. Wilson, Amended Applications of NGL Water Solutions Permian, LLC for Approval of Saltwater Disposal Wells in Lea County, New Mexico." New Mexico Oil Conservation Division Case No, 16438 and Case No. 16440.
Reynolds, Todd. 2019. "FSP Analysis (Fault Slip Potential) Exhibits." New Mexico Oil Conservation Division Case No. 20313, Case No. 20314, and Case No. 20472.
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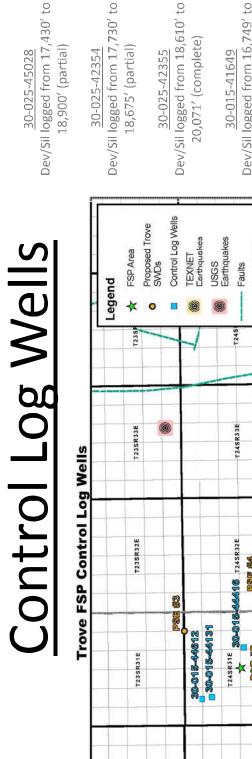
References

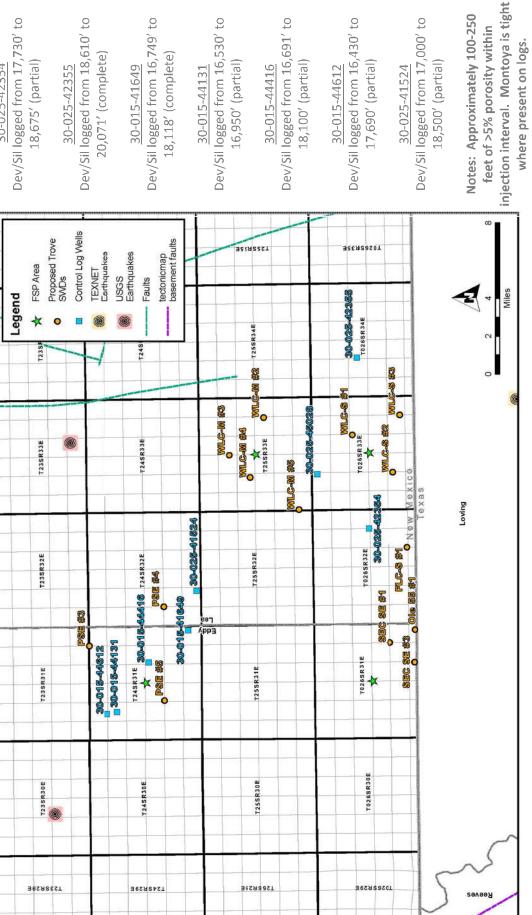




Appendix

and Nearby Deep SWDs Injection Data Control Log Well Details





17Data Source: New Mexico OCD 2019

CONSULTING ANTRONS · ENERGY · PLANNING · TECHNOLOGY ENGINEERING · ENVIRONMENTAL GOVERNMENT' REL

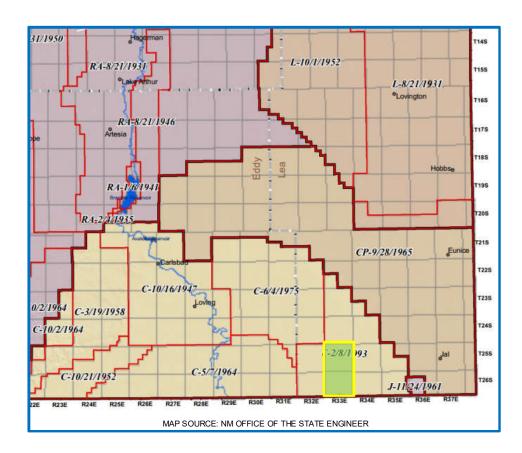
Nearby Deep SWD Injection Data

FSP Area	API #	Well Name	Average Daily Injection Rate (BWPD) Injection Start-Date	Injection Start-Date
1	30-015-43867	CYPRESS SWD #001	8,377	Jul - 2018
1	30-025-29000	DIAMOND 31 FEDERAL COM #001	2,950	Jan - 2014
1, 2	30-025-35598	RED HILLS SWD #001	8,346	Dec - 2018
2	30-025-42355	RATTLESNAKE 16 SWD #001	5,834	Dec - 2015
3	30-025-43379	PADUCA 6 SWD #001Y	21,046	Aug - 2017
4	30-025-41524	COTTON DRAW 32 STATE SWD #002	12,724	Mar - 2017
4	30-015-41649	COTTON DRAW UNIT SWD #181	10,367	Jan - 2014
4	30-015-44676	MESA VERDE SWD #003	8,396	Sep - 2018
4	30-015-40935	PLU DELAWARE B 23 FEDERAL SWD #001	9,742	Jul - 2013
4	30-015-44612	SAND DUNES SWD #001	1,472	Nov - 2018
4	30-015-44131	SAND DUNES SWD #002	17,396	Jul - 2018
4	30-025-43473	STATION SWD #001	25,243	Aug - 2018
4	30-015-44416	STRIKER 2 SWD #001	11,584	Oct - 2018



C-108 - Item XI

Groundwater Basins - Water Column / Depth to Groundwater



The subject well is located within the Carlsbad Basin.

Fresh water in the area is generally available from the Rustler and Santa Rosa formations. State Engineer's records show water wells in the area with a depth to groundwater of 90 to 185 feet and an average depth of 142 feet.

There are NO water wells located within one mile of the proposed SWD.



C-108 ITEM XII

Geologic Affirmation

We have examined available geologic and engineering data and have found no evidence of open faults or other hydrologic connection between the disposal interval and any underground sources of drinking water.

Ben Stone, Partner SOS Consulting, LLC

Project: Trove Energy and Water, LLC WLC South Project Area Reviewed 2/22/2019

C-108 ITEM XIII – PROOF OF NOTIFICATION

IDENTIFICATION AND NOTIFICATION OF INTERESTED PARTIES

Exhibits for Section

Affected Parties Map

List of Interested Parties

Notification Letter to Interested Parties

Proof of Certified Mailing

Published Legal Notice

WLC South Federal SWD Well No.4 – Affected Parties Plat

(Attachment to NMOCD Form C-108, Application for Authority to Inject.)

	(N)	swse (0)	(P) 30-025-42886	(M)	(N) ^{10.10.0}	214/88 SWSE (0)	(P)	L 4	(N) ³⁸⁻⁸²⁵	SWSE (0)	(P) 30-025-40	(M) 343 30-02 0-025-42905	(N) 5-41211 30-02
1	NENW (C)	104 NWNE (B)	025-4210.4 •3 NENE (A)	30-025-08414 (8)	NENW (C)	NWINE (B)	30-025-43990 NENE (A)	025-42973 30-025 L 1	-44172 30-025-4401 -44172 30-025-4401 NEXW (C)	44-07 30 308/025-44 (8)	-025-44174 445 30-025-4417 (\$3,0-025-	NWNW 68503 (D)	NENW (C)
	SENW (F)	SWAE (G)	SENE (H)	SMNW (E) 10.861	SENNY (B)	SWME (Q)	SENE (H) 30	L.2 025-43267 025-40382	SENW (F)	SWME (G)	SENE (H)	SWNW (E)	SENW (F)
2	NESW (K)	NWSE (J)	NESE (1)	new for	NESW (K)	T.2	NESE (1)	L	30-025-28113 (R)	NWSE (J)	MESE (1)	30-02.5-2.8.402 (E)	NESW (K)
	SESW (N)	SWSE (0)	sese (P)	SWSW (M)	SESW (N)	SWSE (0)	30-025-08413 (P)	L.4	SESW (N)	swst (0)	S (P	SWSW (M)	SESW (N)
	NENW (C)	NMME (B)	NENE (A)	NWNW (D)	NENW (C)	NMNE (B)	NENE (A)	30-025-0850'4' L91		NMNE (8)	NENE (A)	30-0 NWNW (D)	30-025-41234 25-41232 30-0 NENW (C)
	SENW (F)	265 33E SMAE (G) T,	.1 ^{sene}	sww.(E)	.5	SWNE (G)	30-025,28329 (M)	L 2	SENW (F)	SWNE (G)	SENE (H) 30 3025-4	SW90/025-4 (E) 025-46062 067.139.025-46062	265 34E 4668 SENW (F),189 30-025-4601830 KE F L307025-4
	NESW (K) 30-015- Q	NWSE (J)	NESE (1)	NWSW (L)	NESW (К)	NAVSE (J)	1 NESE (1)	L3	30-025-0.3973 (K)	9 30-02 <u>5-01</u> 505 (3)	30 ⁻⁶²⁵⁻⁸⁶ 100 (11)	410 225-43186 NWSW (L)	30-025-46054, 30-025-27814 (K)
4411 4	30-015-43544 30-025-01424 (Å) 30-025-44	5//5E (O) 025-44096 30-025-44	SESE (P) 07530-025-44074 025-44073 30-	SWSW (M) 30-025-44754 925-44753 3	SESW (N) 30-025-447 0-025-447	SWSE (O) 31 30-025-4483 3-025-4483	SESE (P) 4 30-025-44831 \$30-025-44	L.4	SEBW (N)	50	SESE (P)	swsw 0-025-40383	SESW (N)
1	30-025-43569 63568 NEWW (C)	30-025-43570 30-025-43571 NVME (B)	30-025-43572 NENE (A)	NWNOV (D)	30-025-01-254 (E)	30-025-39743 5000E (B)	NENE (A)	LI	(C)	NVMNE (B)	NENE (A)	NWNW (D)	NENW (C)
1	SENW (F)	SWITE (G) 6 INTEL	SENE (H) 121490	610110 305025-410 4	SENW 67 ^(F) 2	SWNE (G) 55	SENE (H)	L 2	SENW (F)		36-02 <u>52</u> 8229 (Å)	30-@5,28651 (Ê)	SENW (F)
	NESW (K)	30-025-25685 (\$)	NESE (1)	MWSW (L)	NESW (K)	MASE (J)	NESE (1)	L3	NESW (K)	NWVSE (J)	NESE (1)	NWSW (L)	NESW (K)



— LEGEND –

- T.1 NMNM-122622 EOG Resources, Inc.
- T.2 NMNM-122621 EOG Resources, Inc.
- T.3 NMNM-114992 Chevron USA, Inc.
- T.4 NMNM-122626 EOG Resources, Inc.
- T.5 NMNM-0002965A ConocoPhillips Co.



C-108 ITEM XIII – PROOF OF NOTIFICATION AFFECTED PARTIES LIST

SOS Consulting is providing electronic delivery of C-108 applications. ALL APPLICABLE AFFECTED PARTIES ARE PROVIDED A LINK IN THE NOTICE LETTER TO A SECURE SOS/ CITRIX SHAREFILE[®] SITE TO VIEW AND DOWNLOAD A FULL COPY OF THE SUBJECT C-108 APPLICATION IN PDF FORMAT.

"AFFECTED PERSON" MEANS THE DIVISION DESIGNATED OPERATOR; IN THE ABSENCE OF AN OPERATOR, A LESSEE WHOSE INTEREST IS EVIDENCE BY A WRITTEN CONVEYANCE DOCUMENT EITHER OF RECORD OR KNOWN TO THE APPLICANT AS OF THE DATE THE APPLICANT FILES THE APPLICATION; OR IN THE ABSENCE OF AN OPERATOR OR LESSEE, A MINERAL INTEREST OWNER WHOSE INTEREST IS EVIDENCED BY A WRITTEN CONVEYANCE DOCUMENT EITHER OF RECORD OR KNOWN TO THE APPLICANT AS OF THE DATE THE APPLICANT FILED THE APPLICATION FOR PERMIT TO INJECT.; PER OCD RULES NMAC 19.15.26.7, A. AND 19.15.26.8, B.2.

SURFACE OWNER

1 U.S. DEPARTMENT OF INTERIOR Bureau of Land Management Oil & Gas Division 620 E. Greene St. Carlsbad, NM 88220 Certified: 7018 2290 0001 2038 6667

OFFSET MINERALS LESSEES and OPERATORS (All Notified via USPS Certified Mail)

BLM Leases NMNM-122622, 122621, 122626 (T.1, T.2 and T.4 on Map) Lessee & Operator

2 EOG RESOURCES, INC. 105 S. 4th St. Artesia, NM 88210 Certified: 7018 2290 0001 2038 6674

BLM Lease NMNM-0002965A (T.5 on Map) Lessee

3 CONOCOPHILLIPS COMPANY P.O. Box 2197 Houston, TX 77252-2197 Certified: 7018 2290 0001 2038 6681

BLM Lease NMNM-114992 (T.3 on Map) Lessee & Operator

4 CHEVRON USA, INC. Attn: Linda McMurray, Permitting Team 6301 Deauville Blvd. Midland, TX 79706 Certified: 7018 2290 0001 2038 6698

OFFSET MINERALS OWNERS (Notified via USPS Certified Mail)

U.S. DEPARTMENT OF INTERIOR Bureau of Land Management Oil & Gas Division 620 E. Greene St. Carlsbad, NM 88220

C-108 ITEM XIII – PROOF OF NOTIFICATION AFFECTED PARTIES LIST (cont.)

REGULATORY

NEW MEXICO OIL CONSERVATION DIVISION (*Filed to OCD Online w/ \$500 app fee.*) 1220 S. St. Francis Dr. Santa Fe, NM 87505

NEW MEXICO OIL CONSERVATION DIVISION 1625 N. French Drive Hobbs, NM 88240

WLC-S #2



September 16, 2019

NOTIFICATION TO INTERESTED PARTIES via U.S. Certified Mail – Return Receipt Requested

To Whom It May Concern:

Trove Energy and Water, LLC, Hobbs, New Mexico, is preparing applications to the New Mexico Oil Conservation Division to drill and complete for salt water disposal the WLC South Federal SWD Well No.2. The proposed commercial operation will be for produced water disposal from area operators. As indicated in the notice below, the well will be located in Section 24, Township 26 South, Range 33 East in Lea County, New Mexico.

The published notice states that the interval will be from 17,410 feet to 18,730 feet into the Devonian, Silurian and Fusselman formations.

Following is the notice published in the Hobbs News-Sun, Hobbs, New Mexico on or about September 15, 2019.

LEGAL NOTICE

Trove Energy and Water, LLC, 1919 North Turner, Hobbs, NM 88240, is filing Form C-108 (Application for Authority to Inject) with the New Mexico Oil Conservation Division seeking administrative approval for a salt water disposal well. The proposed well, the WLC South Federal SWD Well No.4 will be located 1170' FNL and 150' FEL, Section 24, Township 26 South, Range 33 East, Lea County, New Mexico; approximately 19.8 miles west/ southwest of Jal, NM.

Produced water from area production will be commercially disposed into the Devonian, Silurian and Fusselman formations at a maximum interval depth of 17,410' to 18,730' at a maximum surface pressure of 3482 psi and a rate limited only by such pressure. Mudlogging and e-logs will confirm final interval depths.

Interested parties wishing to object to the proposed application must file with the New Mexico Oil Conservation Division, 1220 St. Francis Dr., Santa Fe, NM 87505, (505)476-3460 within 15 days of the date of this notice. Additional information may be obtained from the applicant's agent, SOS Consulting, LLC, (903)488-9850 or, email info@sosconsulting.us.

You have been identified as a party who may be interested as an offset lessee or operator.

<u>You are entitled to a full copy of the application</u>. A full copy in PDF format will be posted on the SOS Consulting *ShareFile* site and available for future download (posting may lag behind the notice effort).

Use the URL link: <u>https://sosconsulting.sharefile.com/d-s4e8c20c7859428b8</u> (Please Note: The ShareFile service is powered by Citrix Systems and is completely secure.*)

The link to this file will be active for 60 days from the date of this letter. Your company can access and download the file a maximum of five (5) times. (One copy may be downloaded and shared as needed among your company.)

If preferred, you may call SOS Consulting, LLC at 903-488-9850, or email info@sosconsulting.us, and the same PDF file copy will be expedited to you via email.

Please use a subject like "WLC South Fed SWD #4 September 2019 PDF Copy Request".

Thank you for your attention in this matter.

Best regards,

Ben Stone, SOS Consulting, LLC Agent for Trove Energy and Water, LLC

Cc: Application File

SOS Consulting is committed to providing superior quality work using technology to assist clients and affected parties in obtaining the documentation required. SOS will continue to utilize methods which are less energy and resource intensive including, the reduction of paper copies.

We hope you'll partner with us and appreciate these efforts.

* You will be asked for your email, name and company. This will not be used by anyone except keeping track of the file downloads. You will not be solicited by SOS or anyone else. Data is stored on Citrix Systems servers only.





C-108 – Item XIV

Proof of Notice - Certified Mail Receipts



Affidavit of Publication

1

STATE OF NEW¹MEXICO 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 September 15, 2019 and ending with the issue dated September 15, 2019.

Ussie Black



Sworn and subscribed to before me this 15th day of September 2019.

LEGAL NOTICE SEPTEMBER 15, 2019 Trove Energy and Water, LLC. 1919 North Turner, Hobbs. NM 88240, is filling Form C-108 (Application for Authority to inject) with the New Mexico Orli-Conservation Division seeking administrative approval for a salt water disposal well. The proposed well, the WLC South Federal SWD Weil No.4 will be located 1170' FNL and 150' FEL. Section 24, Township 26 South, Range 33 East, Lea County. New, Maxico, approximately 19.8 miles west/ southwest of Jahney. Produced water from area ony by such pressure only by such pressure confirm inal interval depths. Interested parties wishing to application must file with the New Mexico Otti St. Francis Dr., Santa Fe, NM 87505, (505)476-3460 within 15 days of the date of his notice. Additional from the applicant's agent go3)482 pation. 2000

Affidavit of Publication

STATE OF NEW MEXICO COUNTY OF LEA

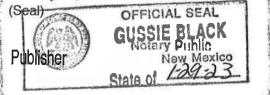
I, Daniel Russell, Publisher of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, solemnly swear that the clipping attached hereto was published in the regular and entire issue of said newspaper, and not a supplement thereof for a period of 1 issue(s).

> Beginning with the issue dated September 15, 2019 and ending with the issue dated September 15, 2019.

UNALO BRACK

'Business

My commission expires January 29, 2023



Sworn and subscribed to before me thissh 15th day of September 2019.

