Revised March 23, 2017

RECEIVED: 11/9/2018	REVIEWER	TYPE: IPI	PPKG 2005846495
1	NEW MEXIC - Geologic 220 South St. Fro	O OIL CONSERVATI al & Engineering B ancis Drive, Santa F	ION DIVISION Jureau – Fe, NM 87505
	ADMINISTR	ATIVE APPLICATION	N CHECKLIST
THIS CHECKLIS	ST IS MANDATORY FOR ALL REGULATIONS WHICH REC	ADMINISTRATIVE APPLICATIO	INS FOR EXCEPTIONS TO DIVISION RULES AND ISION LEVEL IN SANTA FE
Applicant: NGL WATER SO	LUTIONS PERMIAN LLC	2	OGRID Number: 372338
Vell Name: STRIKER 3 SW	/D #1		API: 30-015-44407
ool: SWD;DEVONIAN-SILUR	IAN '		Pool Code: 97869
SUBMIT ACCURATE A	ND COMPLETE INF	ORMATION REQUIRE	D TO PROCESS THE TYPE OF APPLICATION
1) TYPE OF APPLICATION A. Location – Sport	DN: Check those v Icing Unit – Simulto	which apply for [A] aneous Dedication DJECT AREA)	
B. Check one on [1] Commingli DHC [II] Injection - WFX 2) NOTIFICATION REQU A. Offset opera B. Royalty, ove C. Application D. Notification E. Notification F. Surface ow G. For all of the H. No notice re	ly for [1] or [1] ing – Storage – Me CTB PL Disposal – Pressur PMX SV URED TO: Check t ators or lease hold erriding royalty ow requires publishe and/or concurre and/or concurre ner e above, proof of equired reby certify that t	easurement C PC OLS re Increase – Enhance VD IPI EOR hose which apply. ders vners, revenue owne ed notice nt approval by SLO nt approval by BLM notification or publi	Content Content Complete Content Content Complete Complete Content Complete Complete
administrative appr understand that no notifications are sub	oval is accurate or action will be tak pomitted to the Divi	and complete to the en on this applications	best of my knowledge. I also on until the required information and
Note: Stat	ement must be complet	ed by an individual with mo	nagerial and/or supervisory capacity.
Neel L. Duncan			9 November 2018 Date
Print or Type Name			+1 303 947 9402 Phone Number
Signature			neel.duncan@iptenergyservices.com e-mail Address



NGL Water Solutions Permian, LLC. Striker 3 SWD #1 API No. 30-015-44407

Contact Information:

Neel Duncan **Integrated Petroleum Technologies Managing Director** neel.duncan@iptenergyservices.com (303) 947-9402

Step Rate Test Report for Striker #3 SWD (Devonian). Summary:

NGL requests an increase in the maximum allowable injection pressure from 2780 psig to 3600 psig based on a step rate test showing that the minimum frac gradient of the formation and or confining layers is 0.629 psi/foot, equating to a surface injection pressure of 4414 psig.

November 8, 2018

Integrated Petroleum Technologies, Inc. November 8, 2018 Page 1



November 8, 2018

Mr. Philip Goetze State of New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division Engineering Bureau 1220 South St. Francis Drive Santa Fe, NM 87505

RE: Surface Injection Pressure Increase to 3600 psig

NGL Water Solutions Permian, LLC. Striker 3 SWD #1 API No. 30-015-44407 Siluro-Devonian Formation Eddy County, New Mexico

Dear Mr. Goetze,

NGL Water Solutions Permian, LLC. (OGRID 372338) respectfully requests an increase in the Surface Injection Pressure for the Striker 3 SWD #1 to 3600 psig. This request is made based on the results of a recent Step Rate Test (SRT) performed on October 24, 2018 which shows formation and/or confining layer competency to 4414 psig. This pressure increase will increase the injection rate without fracturing the formation or confining strata. The well history and a chronological order of permit limits is listed below:

08/25/2018	UIC Permit set operating limits to no more than 2780 psi
10/24/2018	Second Step Rate Test indicated fracture gradient of 0.629 psi/ft

The initial wellhead pressure prior to performing the SRT was 609 psig. The SRT conducted on October 24, 2018 pumped a series of 8 steps consisting of 1, 2, 4, 8, 16, 24, 32 & 40 BPM, pumped for a duration of 30 minutes each step using 9.8 ppg (1.175 specific gravity) produced water from the NGL Water Solutions Permian facility. The weight of the fluid was measured using a Fann Mud Balance calibrated with fresh water. A digital quartz pressure gauge was used to monitor surface pressure at the wellhead for the duration of the SRT and the Colebrook iterative solution was used to calculate friction for bottom hole pressure. The gauge information is provided below:

Manufacture	Model No.	Serial No.	Calibration Date
Spartek Systems	SS6100	10063	June 7, 2018

The SRT identified a fracture gradient of 0.629 psi/ft with a surface pressure of 4414 psig. The surface pressure is dominated by friction The Instantaneous Shut-In Pressure (ISIP) was 1819 psig, 5-minutes after ISIP was 1706 psig, 10-minutes after ISIP was 1620 psig and 15-minutes after ISIP was 1531 psig. Pressure at the top of the open hole interval was identified using the recorded surface pressures, Colebrook iterative solution to determine tubular friction pressures and hydrostatic pressure calculations. Once the appropriate bottom hole pressure was identified, the fracture pressure and fracture gradient were determined.

Integrated Petroleum Technologies, Inc. November 8, 2018 Page 2



The parameters used to determine friction and bottom hole pressures are provided in the tables below:

Pressure Calculations at 32.0 BPM						
Tubir	ng Friction Pressu	re Calculation	S			
Outside Diameter, (inch)	Inside Diameter, (inch)	Length, (feet)	Friction Pressure, (psig)			
5-1/5"	4.892"	9,277'	1164			
4-1/2"	4.000"	4,652'	1574			
Combined	Friction Pressure	, (psig)	2739			

Hydrostatic Pressure Calculations	
Gauge Recorded Surface Pressure, (psig)	4414'
Depth of Injection Liner Shoe, (feet)	13,978'
Specific Gravity of Fluid, (unitless)	1.175
Hydrostatic Pressure at Top of Open Hole, (psi)	7123

The calculation to determine bottom hole pressure at top of the injection interval (fracture pressure):

Surface Pressure	-	Friction Pressure	+	Hydrostatic Pressure	=	Bottom Hole Pressure at Top of Injection Interval (Fracture Pressure)
4414 psi		2739 psi		7123 psi		8798 psi

The calculation to determine fracture gradient at 32.0 BPM using 9.8 ppg (1.175 specific gravity) produced fluid:

Bottom Hole Pressure at Top of Injection Interval (Fracture Pressure) ÷	Depth to Top of Open Hole	=	Fracture Gradient
8798 psi	13,978'		0.629 psi/ft

Integrated Petroleum Technologies, Inc. November 8, 2018 Page 3



Striker 3 SWD #1 - Step Rate Test Percentages, Rates and Pressure Results					
Step	Percent of Max Rate, (%)	Rate (BPM)	Step Duration, (min)	Recorded Surface Pressure, (psig)	
Step 1	2.5	1.0*	30	670	
Step 2	5	2.0	30	607	
Step 3	10	4.0	30	667	
Step 4	20	8.0	30	965	
Step 5	40	16.0	30	1846	
Step 6	60	24.0	30	2991	
Step 7	80	32.0	30	4414	
Step 8	100	40.0	30	5945	

NGL Water Solutions Permian, LLC. respectfully requests an 820 psi pressure increase from the current Surface Injection Pressure to 3600 psi. This rate increase is for the approved open hole injection interval between 13,978' and 15,069' (1091' injection interval). The fracture pressure was identified at 4414 psi; however, a Surface Injection Pressure of 3600 psi is requested due to horsepower constraints at this facility.

Please feel free to contact me at 303-947-9402 to discuss the request.

Sincerely,

Neel Duncan Managing Director

 Attached:
 Current Completion Wellbore Diagram

 Table of Step Rate Test Analysis Calculations

 Graph Summary of Step Rate Test Analysis

 Graph Summary of Pressure Versus Injection Rate with Interpretation

 Copy of the Order Authorizing the Injection into the Well

 Surface Gauge Pressure Data (Excel File Attachment)

Integrated Petroleum Technologies, Inc. November 8, 2018 Page 4





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	NGL Water Solutions Permian - Striker 3 SWD #1 Table of Step Rate Test Analysis Calculations							
Step	Rate	Time	Vol. Per Step	Cumulative Volume	Tubing Friction	Surface Pressure	Bottom Hole Pressure at the Top of Injection Interval	
Seq.	BPM	Min.	BBL	BBL	psi	psig	psig	
1	1	30	30	30	5	670	7788	
2	2	30	60	90	17	607	7713	
3	4	30	120	210	59	667	7731	
4	8	30	240	450	210	965	7878	
5	16	30	480	930	753	1846	8216	
6	24	30	720	1650	1599	2991	8515	
7	32	30	960	2610	2739	4414	8798	
8	40	30	1200	3810	4173	5945	8895	



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Integrated Petroleum Technologies, Inc.

NGL Water Solutions Permian, LLC. Striker 3 SWD #1 – Siluto Devonian Formation Surface Pressure Injection Increase

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State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez Governor

Ken McQueen Cabinet Secretary

Matthias Sayer Deputy Cabinet Secretary David R. Catanach, Division Directo Oil Conservation Division



Administrative Order SWD-1690 August 25, 2017

ADMINISTRATIVE ORDER OF THE OIL CONSERVATION DIVISION

Pursuant to the provisions of Division Rule 19.15.26.8 B NMAC, NGL Water Solutions Permian, LLC (the "operator") seeks an administrative order for its Striker 3 SWD Well No. 1 ("proposed well") with a location of 472 feet from the South line and 897 from the East line, Unit P of Section 33, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico, for the purpose of commercial disposal of produced water.

THE DIVISION DIRECTOR FINDS THAT:

The application has been duly filed under the provisions of Division Rule 19.15.26.8B. NMAC and satisfactory information has been provided that affected parties as defined in said rule have been notified and no objections have been received within the prescribed waiting period. The applicant has presented satisfactory evidence that all requirements prescribed in Rule 19.15.26.8 NMAC have been met and the operator is in compliance with Rule 19.15.5.9 NMAC.

IT IS THEREFORE ORDERED THAT:

The applicant, NGL Water Solution Permian, LLC (OGRID 372338), is hereby authorized to utilize its Striker 3 SWD Well No. 1 (API 30-015-44407) with a location of 472 feet from the South line and 897 from the East line, Unit P of Section 33, Township 23 South, Range 28 East, NMPM, Eddy County, for disposal of oil field produced water (UIC Class II only) through an open hole interval consisting of the Devonian and Silurian formations from 13900 feet to approximately 15200 feet.

Injection will occur through either an internally-coated, 5-1/2-inch or smaller tubing inside the surface and intermediate casings, and a 4-1/2-inch or smaller tubing inside the liner. Further, a packer shall be set within 100 feet of the uppermost perforation.

This permit does not allow disposal into the Ellenburger formation (lower Ordovician) or lost circulation intervals directly on top and obviously connected to this formation.

Prior to commencing disposal, the operator shall submit mudlog and geophysical logs information, to the Division's District geologist and Santa Fe Bureau Engineering office, showing evidence agreeable that only the permitted formation is open for disposal including a summary of

> 1220 South St. Francis Drive • Santa Fe, New Mexico 87505 Phone (505) 476-3441 • Fax (505) 476-3462 • email: www.emnrd.state.nm.us/ocd

Integrated Petroleum Technologies, Inc. November 8, 2018 Page 8



Administrative Order SWD-1690 NGL Water Solutions Permian, LLC August 25, 2017 Page 2 of 3

depths (picks) for contacts of the formations which the Division shall use to amend this order for a final description of the depth for the injection interval.

IT IS FURTHER ORDERED THAT:

The operator shall take all steps necessary to ensure that the disposed water enters only the approved disposal interval and is not permitted to escape to other formations or onto the surface. This includes the completion and construction of the well as proposed in the application and, if necessary, as modified by the District Supervisor.

The operator shall circulate the cement behind the casing to surface for all surface and intermediate casings.

The operator shall run a CBL (or equivalent) across the 7-5/8-inch liner from 500 feet above the top of liner to the bottom of the liner to demonstrate a good cement across the 7-5/8inch liner, and good bond between the liner and the 9-5/8-inch casing.

Within two years after commencing disposal, the operator shall conduct an injection survey, consisting of a temperature log or equivalent, over the entire injection interval using representative disposal rates. Copies of the survey results shall be provided to the Division's District I office and Santa Fe Engineering Bureau office.

After installing tubing, the casing-tubing annulus shall be loaded with an inert fluid and equipped with a pressure gauge or an approved leak detection device in order to determine leakage in the casing, tubing, or packer. The casing shall be pressure tested from the surface to the packer setting depth to assure casing integrity.

The well shall pass an initial mechanical integrity test ("MIT") prior to initially commencing disposal and prior to resuming disposal each time the disposal packer is unseated. All MIT procedures and schedules shall follow the requirements in Division Rule 19.15.26.11A. NMAC. The Division Director retains the right to require at any time wireline verification of completion and packer setting depths in this well.

The wellhead injection pressure on the well shall be limited to **no more than 2780 psi**, <u>but</u> <u>may be modified by the Division Director following the completion of the initial Step-Rate Test.</u> In addition, the disposal well or system shall be equipped with a pressure limiting device in workable condition which shall, at all times, limit surface tubing pressure to the maximum allowable pressure for this well. The operator shall install and maintain a chart recorder showing casing and tubing pressures during disposal operations.

The Director of the Division may authorize an increase in tubing pressure upon a proper showing by the operator of said well that such higher pressure will not result in migration of the disposed fluid from the target formations. Such proper showing shall be demonstrated by sufficient evidence including but not limited to an acceptable Step-Rate Test.

The operator shall notify the supervisor of the Division's District II office of the date and

Integrated Petroleum Technologies, Inc. November 8, 2018 Page 9



Administrative Order SWD-1690 NGL Water Solutions Permian, LLC August 25, 2017 Page 3 of 3

time of the installation of disposal equipment and of any MIT so that the same may be inspected nd witnessed. The operator shall provide written notice of the date of commencement of disposal to the Division's District II office. The operator shall submit monthly reports of the disposal operations on Division Form C-115, in accordance with Division Rules 19.15.26.13 and 19.15.7.24 NMAC.

The injection authority granted under this order is not transferable except upon Division approval. The Division may require the operator to demonstrate mechanical integrity of any injection well that will be transferred prior to approving transfer of authority to inject.

The disposal authority granted herein shall terminate two (2) years after the effective date of this Order if the operator has not commenced injection operations into the subject well. One year after the last date of reported disposal into this well, the Division shall consider the well abandoned, and the authority to dispose will terminate *ipso facto*. The Division, upon written request mailed by the operator prior to the termination date, may grant an extension thereof for good cause.

Compliance with this Order does not relieve the operator of the obligation to comply with other applicable federal, state or local laws or rules, or to exercise due care for the protection of fresh water, public health and safety and the environment.

Jurisdiction is retained by the Division for the entry of such further orders as may be necessary for the prevention of waste and/or protection of correlative rights or upon failure of the operator to conduct operations (1) to protect fresh or protectable waters or (2) consistent with the requirements in this order, whereupon the Division may, after notice and hearing, terminate the disposal authority granted herein.

DAVID R. CATANACH Director

DRC/mam

cc: Oil Conservation Division – Artesia District Office Administrative application – pMAM1721954147



Striker 3 SWD No. 1 (30-015-44407): History of Injection Rates and Pressure

Goetze, Phillip, EMNRD

From: Sent: To: Subject: Attachments: Neel Duncan <neel.duncan@iptenergyservices.com> Wednesday, May 8, 2019 10:50 AM Goetze, Phillip, EMNRD [EXT] Striker 3 SRT Surface Injection Pressure Increase Request Letter.pdf

Hi Phillip,

Per my voice mail I thought I would put this on the top of your inbox. Thanks.

Neel

Neel L. Duncan C: +1 303 947 9402 www.iptenergyservices.com



Goetze, Phillip, EMNRD

From:	Neel Duncan <neel.duncan@iptenergyservices.com></neel.duncan@iptenergyservices.com>
Sent:	Friday, March 8, 2019 2:07 PM
То:	Goetze, Phillip, EMNRD
Cc:	Wade, Gabriel, EMNRD; Jones, William V, EMNRD; Bratcher, Mike, EMNRD
Subject:	[EXT] RE: Recent Issues with NGL Well Completions
Attachments:	20190308 Integrity summary table.docx

Hi Phillip,

As you are aware, NGL Water Solutions Permian LLC ("NGL") operates or drills, under OCD authorization, the following Devonian salt-water disposal wells:

Striker 6	(API #	030-025-44291)
Striker 3	(API#	030-015-44407)
Striker 2	(API #	030-015-44416)
Striker 1	(API #	030-015-44406)
Alpha	(API #	030-015-44530)
Red Road	(API #	030-015-45235)
Sidewinder	(API #	030-025-45427)

In your email below, you have notified IPT that some of the above wells may be out of compliance with certain pressure test requirements found at NMAC 19.15.16. Consistent with NMAC 19.15.26.9, NGL employs various measures to case its wells with safe and adequate casing or tubing so as to prevent leakage, and set and cement the casing or tubing to prevent the movement of formation or injected fluid from the injection zone into another zone or to the surface around the outside of a casing string.

Specifically, NGL cements all casing strings via the pump and plug method and circulates cement to surface to ensure groundwater is protected. Additionally, with each subsequent casing string in the well construction, NGL circulates cement to surface, thereby protecting the previous casing string with cement on both sides. This approach creates a permanent protective barrier for groundwater and protects and isolates each successive casing string from pressure.

NGL tests 9 5/8" and 7 5/8" casing by applying pressure to the annulus between the injection tubing and the 9 5/8 casing string and 7 5/8" liner. Isolation on bottom is provided by the injection packer set at the bottom of the 7 5/8" liner. I believe all of these annular pressure tests have thus far been witnessed by inspectors and if any need to be repeated due to any lingering concerns we are happy to do so.

Operating in this manner has ensured compliance with NMAC 19.15.26. However, your email has created some uncertainty at IPT and NGL regarding applicable drilling and testing requirements. Concerning the drilling, casing, operation, and testing of its injection wells, NGL has operated under and in compliance with NMAC 19.15.26. Is it the OCD's position that the drilling and testing requirements applicable to oil and gas wells under 19.15.16 are also applicable to injection wells?

Summarized in the attached table are the integrity measures taken by NGL in its drilling and completion program. By circulating cement and confirming cement with cement bond logs, including CBLs of the 13-3/8" casing strings, we believe we are protecting groundwater, providing sufficient isolation of injection fluids, and ensuring long term wellbore integrity.

NGL is committed to operating in compliance with OCD regulations and appreciates your efforts to help clarify this issue. IPT and NGL representatives are available, at your convenience, to meet to discuss this matter. I could visit your office as soon as the 13th if you are still available.

The lack of a successful casing test on the 20-inch surface casing for the Red Road SWD No. 1 (30-015-45235) is of particular concern since this is the "water protection" string. Please review your protocols for well completions and inform your personnel that the casing tests must be conducted according to rule. Failure to perform the proper casing tests on these wells may jeopardize the approved status of the SWD order (UIC permit) which relies on these tests for validation of the well's mechanical integrity. Meanwhile, we should have a discussion as to how to address the lack of proper testing for the C-103s already submitted along with other issues related to NGL operations. Please contact me with any questions regarding the content of this email at your convenience. PRG

Phillip Goetze, PG

Engineering Bureau, Oil Conservation Division New Mexico Energy, Minerals and Natural Resources Department 1220 South St. Francis Drive, Santa Fe, NM 87505 Direct: 505.476.3466 E-mail: phillip.goetze@state.nm.us





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FIELD SERVICE	Country: USA	State/Province: New Mexico	County/Parish: Eddy	
	Location:	Site:	Survey/STR:	
HOUSTON Y CALGARY	API No:	Field:	Well Type/Status: SWD	
Texas License F-9147	State ID No:	Project No: 1469	Date: 5/13/17	
3345 Bee Cave Road, Suite 201 Austin, Texas 78748	Drawn: WHG	Reviewed: CW	Approved: CW	
Tel: 512.732.9812 Fax: 512.732.9816	Rev No: 1	Notes:		

3				
Submit I Copy To Appropriate District	State of New Mexico		Form C-103	
Office District I (575) 393-6161	Energy, Minerals and Natural Resources Energy, Minerals and Natural Resources Cill - (575) 748-1283 CIL CONSERVATION DIVISION		Revised July 18, 2013	
1625 N. French Dr., Hobbs, NM 88240			WELL API NO.	
District II - (575) 748-1283 811 S. First St. Artesia, NM 88210			30-015-44407	
District III - (505) 334-6178	1220 South St. Francis Dr.		STATE FFF	
1000 Rio Brazos Rd., Aztec, NM 87410 District IV - (505) 476-3460	Santa Fe, NM 87505		6 State Oil & Gas Leas	e No.
1220 S. St. Francis Dr., Santa Fe, NM			o. Dune on et oue beau	
87505 SUNDRY NOTICES AND REPORTS ON WELLS			7 Lesse Name or Unit	Agreement Name
(DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH			STRIKER 3 SWD	
1. Type of Well: Oil Well Gas Well Other SWD			8. Well Number 1	
2. Name of Operator			9. OGRID Number	
NGL WATER SOLUTIONS PERMIAN, LLC			10 Bool name or Wildort	
3. Address of Operator 1500 W WALL ST STE 306 // MIDLAND TY 70701			SWD: SILURIAN-DEVONIAN	
4 Well Leasting			SWD, SILUKIAN-DEV	
4. Well Location	472 fact from the SOLF	TH line and	907 feet from the	FAST line
Section 22	Tourship 229	Pance 29E	NMDM	County LEA
11 Elevation (Show whathar DP PKP PT (DP atc.)				
3 069' GL				
12. Check Appropriate Box to Indicate Nature of Notice, Report or Other Data NOTICE OF INTENTION TO: PERFORM REMEDIAL WORK PLUG AND ABANDON TEMPORARILY ABANDON CHANGE PLANS				
PULL OR ALTER CASING	DR ALTER CASING MULTIPLE COMPL CASING/CEMENT JOB			
DOWNHOLE COMMINGLE				
CLOSED-LOOP SYSTEM	-	OTHER		
13. Describe proposed or comp	leted operations. (Clearly state all t	pertinent details, and	d give pertinent dates, inc	luding estimated date
of starting any proposed work). SEE RULE 19.15.7.14 NMAC. For Multiple Completions: Attach wellbore diagram of proposed completion or recompletion.				
 The proposed wellbore design has changed as follows: Plans to run a 7" Liner rather than a 7-5/8" Liner Plans to run a slotted 4-1/2" liner inside the open hole completion Please see attached wellbore diagram reflecting changes and updated cement vols 				
1AN 1 9 2018				
			JEN	
			RI	ECEIVED
r				
Soud Date:	Rig Release D	ate		
	٨			
I hereby certify that the information	above is true and complete to the b	est of my knowledg	e and belief.	
0111				
SIGNATURE M	TITLE CO	onsulting Engineer	DATE	11/15/2017
Type or print name Chris Wevan	E-mail addres	ss: chris@longuis	t.com PHON	E: (512) 600-1764
For State Use Only	\cap			
APPROVED AV. Kayman	The Salar TITLE (Polaci 24	DATE	1-22-2018
Conditions of Approval (If any):				
	·			