

Additional Information

Extension request materials and
correspondence 9/11/20

Lamkin, Baylen, EMNRD

From: Kaitlyn A. Luck <KALuck@hollandhart.com>
Sent: Friday, September 11, 2020 4:21 PM
To: Lamkin, Baylen, EMNRD
Cc: Adam Rankin; Carla S. Garcia
Subject: [EXT] RE: REQUEST FOR EXTENSION - by Delaware Energy, LLC re Chapman SWD
Attachments: RE: REQUEST FOR EXTENSION - Delaware Energy, LLC - Chapman SWD (Order SWD-1745) - new AOR map

Baylen,

I'm writing to follow up on your email to Carla below to be sure you received the map submitted today in the attached email reflecting there are no new wells or affected parties in the AOR. Please let us know if the Division requires a more formal signed statement. Thanks for your time.

Best,

Kaitlyn

Kaitlyn A. Luck – Associate | Holland & Hart LLP | (o) 505.954.7286 (m) 361.648.1973

From: Lamkin, Baylen, EMNRD <Baylen.Lamkin@state.nm.us> **On Behalf Of** Engineer, OCD, EMNRD
Sent: Thursday, September 10, 2020 12:17 PM
To: Carla S. Garcia <CSGarcia@hollandhart.com>
Subject: RE: REQUEST FOR EXTENSION - by Delaware Energy, LLC re Chapman SWD

External Email

Carla,

We have received your request for extension of deadline to commence injection and I will update our records accordingly. However, in order for an extension request to be processed the applicant must submit one of two things:

- A supplemental AOR analysis that shows any new affected parties and/or new wells that penetrate the injection interval. This would include proof of notice to any new affected parties and schematics of newly penetrating wells.
- A statement from the operator that there are no new wells or affected parties in the AOR

If you have any further questions or concerns feel free to reach out.

Kind regards,

Baylen Lamkin

Petroleum Engineer

Oil Conservation Division

1220 South St. Francis Drive

Santa Fe, New Mexico 87505



From: Carla S. Garcia <CSGarcia@hollandhart.com>

Sent: Wednesday, September 9, 2020 4:39 PM

To: Engineer, OCD, EMNRD <OCD.Engineer@state.nm.us>

Cc: Michael Feldewert <MFeldewert@hollandhart.com>; Adam Rankin <AGRankin@hollandhart.com>; Kaitlyn A. Luck <KALuck@hollandhart.com>

Subject: [EXT] REQUEST FOR EXTENSION - by Delaware Energy, LLC re Chapman SWD

Director Sandoval,

Please find the ***Request for Extension of Deadline to Commence Injection Operations*** regarding Administrative Order SWD-1745 attached.

Thank you,

Carla S. Garcia

Legal Secretary, Holland & Hart LLP

110 North Guadalupe, Suite 1, Santa Fe, NM 87501

T 505.954.4421 F 505.983.6043 M 818.371.5830

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Lamkin, Baylen, EMNRD

From: Kaitlyn A. Luck <KALuck@hollandhart.com>
Sent: Friday, September 11, 2020 8:59 AM
To: Carla S. Garcia; Engineer, OCD, EMNRD
Cc: Michael Feldewert; Adam Rankin
Subject: RE: REQUEST FOR EXTENSION - Delaware Energy, LLC - Chapman SWD (Order SWD-1745) - new AOR map
Attachments: Delaware_Chapman SWD Extension Request 2020-09-09 revised[15363853v1].PDF; Map.Chapman SWD.pdf

Good morning,

Please accept the attached map to complete Delaware Energy, LLC's request for extension of time to commence injection operations under Administrative Order SWD-1745, which was submitted on September 9, 2020. If the Division requires anything further to consider this extension request, please let us know. Thanks for your time.

Best,

Kaitlyn

Kaitlyn A. Luck – Associate | Holland & Hart LLP | (o) 505.954.7286 (m) 361.648.1973

From: Carla S. Garcia <CSGarcia@hollandhart.com>
Sent: Wednesday, September 9, 2020 4:39 PM
To: OCD.engineer@state.nm.us
Cc: Michael Feldewert <MFeldewert@hollandhart.com>; Adam Rankin <AGRankin@hollandhart.com>; Kaitlyn A. Luck <KALuck@hollandhart.com>
Subject: REQUEST FOR EXTENSION - by Delaware Energy, LLC re Chapman SWD

Director Sandoval,

Please find the *Request for Extension of Deadline to Commence Injection Operations* regarding Administrative Order SWD-1745 attached.

Thank you,

Carla S. Garcia

Legal Secretary, Holland & Hart LLP
110 North Guadalupe, Suite 1, Santa Fe, NM 87501
T 505.954.4421 F 505.983.6043 M 818.371.5830

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September 9, 2020

VIA EMAIL

OCD.Engineer@state.nm.us

Adrienne Sandoval
Director, Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505

Re: Administrative Order SWD-1745 - Request for Extension of Deadline to Commence Injection Operations

Dear Director Sandoval,

On September 11, 2018, the Division issued Administrative Order No. SWD-1745, attached as **Exhibit A**, authorizing Delaware Energy, LLC (“Delaware”) to drill the proposed Chapman SWD well No. 1 (API 30-025-44954) at a location 440 feet from the South line and 1398 feet from the East line, Unit letter O of Section 10, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico. On August 22, 2019, Delaware requested the Division issue an extension of Administrative Order SWD-1745, attached as **Exhibit B**.

Pursuant to the Division’s most recent extension, authority to commence injection operations under Administrative Order SWD-1745 will terminate on September 11, 2020. Given the current health emergency relating to COVID-19, Delaware requests a one-year extension of time to commence injection operations under SWD-1745 to **September 11, 2021**.

Your attention to this request is appreciated. Please let me know if you have any questions or require additional information. Thank you for your time and consideration.

Very truly yours,



Adam G. Rankin
Partner

Encl.

cc:

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

Ken McQueen
Cabinet Secretary

Matthias Sayer
Deputy Cabinet Secretary

Heather Riley, Division Director
Oil Conservation Division



Administrative Order SWD-1745
September 11, 2018

**ADMINISTRATIVE ORDER
OF THE OIL CONSERVATION DIVISION**

Pursuant to the provisions of Division Rule 19.15.26.8(B) NMAC, Delaware Energy, LLC (the “operator”) seeks an administrative order for its Chapman SWD Well No. 1 (the “proposed well”) with a location of 440 feet from the South line and 1398 feet from the East line, Unit letter O of Section 10, Township 25 South, Range 36 East, NMPM, Lea 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 19.15.26.8(B) NMAC and satisfactory information has been provided that affected parties 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 Division Rule 19.15.26.8 NMAC have been met and the operator is in compliance with Division Rule 19.15.5.9 NMAC.

Application for Disposal in Devonian and Silurian Formations: Due to the potential for the projected injection volume of the proposed well to impact an area greater than the one-half mile radius applied in Division Form C-108 and Division rule, the applicant has provided the following supplementary information:

1. Notification following Division Rule 19.15.26.8(B) NMAC for a radius of one mile from the surface location of the proposed well;
2. An expanded Area of Review for wells penetrating the disposal interval for a radius of one mile from the surface location of the proposed well; and
3. A statement by a qualified person assessing the potential of induced-seismic events associated with the disposal activities for the predicted service life of the proposed well.

IT IS THEREFORE ORDERED THAT:

The applicant, Delaware Energy, LLC (OGRID 371195), is hereby authorized to utilize its Chapman SWD Well No. 1 (API 30-025-44954) with a location of 440 feet from the South line and 1398 feet from the East line, Unit letter O of Section 10, Township 25 South, Range 36 East, NMPM, Lea County, for disposal of oil field produced water (UIC Class II only) through open-hole completion into an interval consisting of the Devonian formation from approximately 13145

feet to approximately 14145 feet. Injection will occur through internally-coated, 5-inch or smaller tubing within the 7 $\frac{5}{8}$ -inch liner with a packer set within 100 feet of the top of the disposal interval.

The well design shall be modified to include a third casing string that isolates the salt interval (Salado formation) from the Capitan Reef that occurs below the salt interval. The operator shall modify casing design and adjust cement volumes accordingly and submit these changes in a Form C-103 to the Hobbs District office for review and approval. Failure to complete this condition of approval shall void the injection authority of this order.

This permit does not allow disposal into formations below the Devonian formation including the Silurian formations, the Montoya formation and the Ellenburger formation (lower Ordovician) or lost circulation intervals directly on top and obviously connected to these formations.

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 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. If significant hydrocarbon shows occur while drilling, the operator shall notify the Division's District I and the operator shall be required to receive written permission prior to commencing disposal.

If cement does not circulate on any casing string, the operator shall run a cement bond log (CBL) or other log to determine top of cement and shall notify the Hobbs District with the top of cement on the emergency phone number prior to continuing with any further cement activity with the proposed well. If cement did not tie back in to next higher casing shoe, the operator shall perform remedial cement job to bring cement, at a minimum, 200 feet above the next higher casing shoe.

The operator shall run a CBL (or equivalent) across the 7 $\frac{5}{8}$ -inch liner from 500 feet above the liner to the bottom of the liner to demonstrate placement cement across the length of the liner and the cement bond with the tie-in with the next shallower casing. The operator shall provide a copy of the CBL to the Division's District I prior to commencing disposal.

Prior to commencing disposal, the operator shall obtain a bottom-hole pressure measurement representative of the open-hole completion. This information shall be provided with the written notice of the date of commencement of disposal.

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 described in the application and, if necessary, as modified by the District Supervisor.

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 19.15.26.11(A) NMAC. The Division Director retains the right to require at any time wireline verification of completion and packer setting depths in this well.

Without limitation on the duties of the operator as provided in Division Rules 19.15.29 and 19.15.30 NMAC, or otherwise, the operator shall immediately notify the Division's District I office of any failure of the tubing, casing or packer in the well, or of any leakage or release of water, oil or gas from around any produced or plugged and abandoned well in the area, and shall take such measures as may be timely and necessary to correct such failure or leakage.

If the disposal well fails a MIT or if there is evidence that the mechanical integrity of said well is impacting correlative rights, the public health, any underground sources of fresh water, or the environment, the Division Director shall require the well to be shut-in within 24 hours of discovery and the operator shall redirect all disposal waters to another facility. The operator shall take the necessary actions to address the impacts resulting from the mechanical integrity issues in accordance with Division Rule 19.15.26.10 NMAC, and the well shall be tested pursuant to Rule 19.15.26.11 NMAC prior to returning to injection.

The wellhead injection pressure on the well shall be limited to **no more than 2629 psi**. 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 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 I office of the date and time of the installation of disposal equipment and of any MIT so that the same may be inspected and witnessed. The operator shall provide written notice of the date of commencement of disposal to the Division's District I office. The operator shall submit monthly reports of the disposal operations that includes number of days of operation, injection volume, and injection pressure on Division Form C-115, in accordance with Division Rules 19.15.26.13 and 19.15.7.24 NMAC.

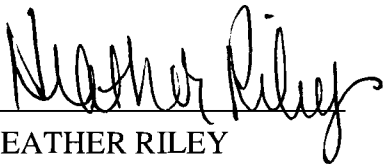
The injection authority granted under this order is not transferable except upon Division approval. The Division may require the operator to demonstrate mechanical integrity of any injection well that will be transferred prior to approving transfer of authority to inject.

The Division may revoke this injection order after notice and hearing if the operator is in violation of Rule 19.15.5.9 NMAC.

The disposal authority granted herein shall terminate one (1) year 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.



HEATHER RILEY
Director

HR/prg

cc: Oil Conservation Division – Hobbs District Office
Well file 30-025-44954

August 22, 2019

State of New Mexico Oil Conservation Division
Attn: Phillip Goetze
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Extension of Administrative Order SWD 1745
Chapman SWD Well No.1

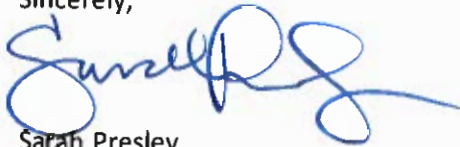
Mr. Goetze:

Delaware Energy, LLC is seeking administrative approval to extend Administrative Order SWD 1745 for one year. We have found that there are no new wells within the AOR and there has been no change to the affected person.

<u>Well:</u>	Chapman SWD #1
<u>API:</u>	30-025-44954
<u>Disposal Zone:</u>	Devonian Formation (from 13,145' to 14,145')
<u>Location:</u>	440' FSL & 1,398' FEL, UL O, Sec. 10-T25S-R36E, Lea Co., NM
<u>Applicants Name:</u>	Delaware Energy, L.L.C.
<u>Applicants Address:</u>	405 N. Mariefeld, Suite 200, Midland, TX 79701

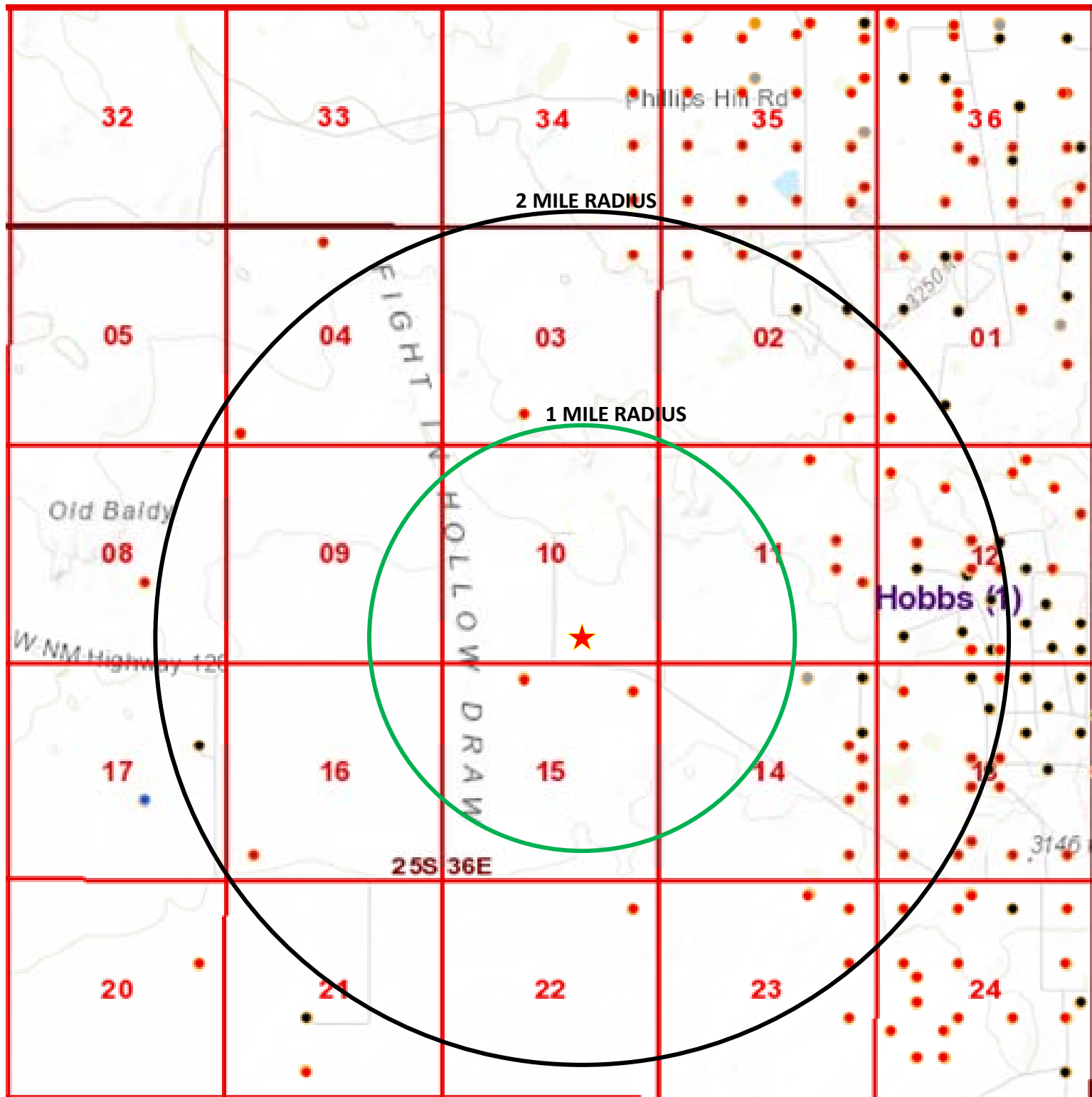
Please contact me if you have any questions at 432-685-7005 or 432-269-3789.

Sincerely,




Sarah Presley
Operations Manager
s.presley@delawareenergy.com

EXHIBIT B



ONE MILE RADIUS
NO NEW WELLS OR OPERATORS

SECTION 10-T25S-R36E
 Chapman SWD #1
(Proposed Location)
Delaware Energy, LLC