

Additional Information

Submitted 4/20/21 in
support of admin
complete check

From: [Jack Bradley](#)
To: [Rose-Coss, Dylan H, EMNRD](#)
Cc: ["Donna Sturdivant"; "Paul Anderson"](#)
Subject: [EXT] FW: JCT Federal 7 1341493 SWD-24121
Date: Tuesday, April 20, 2021 4:51:37 PM
Attachments: [Item7_4&5_Roswell Geological Society Sawver Devonian Paper.pdf](#)
[Item8Supp. Acquirer Map Lea Co.pdf](#)
[Item8Supp. Acquirer Map Lea Co ZOOM.pdf](#)
[Item9Supp. JCT Federal 7 #1 convert well to water injection Devonian ONLY.doc](#)
[Item8&11. State Office of ENG 9S-37E Summary.pdf](#)
[Item8&11. State Office of ENG 9S-38E Summary.pdf](#)
[Item8&11. State Office of ENG 8S-37E Summary.pdf](#)
[Item8&11. State Office of ENG 8S-38E Summary.pdf](#)
[Item3Supp. JCT 7#1 WBD 4-15-21 Proposed.pdf](#)

Dylan, please see responses to your requests below (marked in red). Please also note attachments in support of those requests.

Thank you sir,

Jack Bradley
Geologist
Seguro Oil and Gas, LLC
(O) 432.219.0740
(C) 432.230.4949
jack@seguro-llc.com

From: "Rose-Coss, Dylan H, EMNRD" <DylanH.Rose-Coss@state.nm.us>
Date: April 14, 2021 at 6:27:21 PM CDT
To: donna@seguro-llc.com
Cc: "Goetze, Phillip, EMNRD" <Phillip.Goetze@state.nm.us>, "Lamkin, Baylen, EMNRD" <Baylen.Lamkin@state.nm.us>, "Murphy, Kathleen A, EMNRD" <KathleenA.Murphy@state.nm.us>, "Bustamante, Amalia, EMNRD" <Amalia.Bustamante@state.nm.us>, "Sanchez, Daniel J., EMNRD" <daniel.sanchez@state.nm.us>
Subject: JCT Federal 7 1341493

Donna Sturdivant:

Members of the OCD Underground Injection Control (UIC) team have performed an administrative completeness review for the Seguro Oil and Gas, LLC, C-108 application.

The JCT Federal 7 injection application has been assigned the following tracking numbers: SWD-2412 & pBL2107645690. The admin files associated with the application can be tracked using the following link: <https://ocdimage.emnrd.state.nm.us/imaging/AEOrderFileView.aspx?appNo=pBL2107645690>

Reference# SWD: 2412

The administrative completeness review indicated that additional information is needed for UIC staff to continue with the technical review. The application is currently lacking sufficient details regarding:

- Sources and analysis of injection fluid, and compatibility with receiving formation if injection fluid is not produced water.

Water analysis attached ([Item7 4&5. Roswell Geological Society Sawyer Devonian Paper.pdf](#)).

Seguro Oil & Gas, LLC proposes to inject produced Devonian (Sawyer Devonian Field) water into the Devonian formation.

- Statement of wells intended purpose i.e. will well be used for commercial injection purposes?

JCT Federal "7" #1 well is intended for lease disposal only at this time.

- A description of all USDW aquifers overlying the proposed injection interval, including geologic name and depth to bottom.
 1. The oldest known strata in the region to potentially contain fresh water is within the Dockum Group, which is Triassic in age. Its formations from oldest to youngest include the Santa Rosa, Tecovas, Trujillo, Cooper Canyon, and Redonda formations. It is unclear from publicly available sources that the water bearing parts of the Dockum Group are present in the immediate area due to erosion of the formation in the far northern end of the Permian Basin. However, it is a significant enough source of fresh water to be mentioned for the scope of this application. Due to its potential absence, there is no known depth to bottom of water for this Group or any locatable wells in the area which report to be producing from any of the formations within the Dockum Group. Please note: Dockum Group is also sometimes referred to in the literature as the Chinle Group.
 2. The next youngest known strata in the region to produce fresh water, is the Lower Cretaceous. Most common occurrences of fresh water is within the thinly bedded sandstones at the base of the Tucumcari Shale formation within the Lower Cretaceous. One water well was documented to exist within the JCT 7 region but not within its AOR (located in SW4/SW4 of section 24, T9S-R37E). Please see attached [Item8Supp. GoogleEarth JCT7 WtrWell.jpeg](#) and [Item8Supp. Acquirer Map Lea Co ZOOM.pdf](#) for its location in map view. Depth to top of water("TOW") as shown in [Item8Supp. GoogleEarth JCT7 WtrWell.jpeg](#) for that well(Sec24) is 196ft (+3774ft SS). No bottom depth was recorded for total depth of the well, base of the formation, or the base of water.

3. The youngest and main water source for the majority of the region is the Ogallala formation which is Pliocene in age. The Ogallala aquifer primarily consists of fine grained sandstones, conglomerates, and some calcitic sandstones. The chief productive lithology is unconsolidated and poorly cemented sandstones. While most publicly available maps will show that the Ogallala is present through much of eastern half of Lea Co., NM, a “Ground-Water Conditions in Northern Lea County, New Mexico” geologic map prepared by the Department of the Interior USGS in cooperation with the New Mexico State Engineer by Sidney R. Ash, 1963 will demonstrate the Ogallala is not present within the AOR of the JCT 7 #1 proposed injector. Please see attached [Item8Supp. GoogleEarth JCT7 WtrWell.jpeg](#), [Item8Supp. Acquirer Map Lea Co.pdf](#), and [Item8Supp. Acquirer Map Lea Co ZOOM.pdf](#). The closest Ogallala sourced well documented in the region was drilled in the NW/4 of Sec 16, T9S-R38E and is approximately 1.35miles from the proposed JCT 7 #1 injector. Top of water was recorded at 270’ (+3685’ SS) and no bottom of water, formation, or total depth was reported.

Please note: The top of the Rustler Formation in the JCT Fed 7 #1 is at 2,338ft (+1,652’ SS). On average, surface casing setting depths in the area have been set from 350ft to 520ft from the 1960’s through 2007 vintage wellbores. It is my opinion that the bottom of USDW is most likely around 500ft.

- A description of stimulation process or statement that none will be conducted.
Acid Job. Please see stimulation detail in attached procedure, [Item9Supp. JCT Federal 7 #1 convert well to water injection Devonian ONLY.doc](#)
- Chemical analysis of fresh water from two or more fresh water wells (if available and producing) within 1 mile of the proposed well, including location and sampling date(s).
 - If there a no fresh water wells in the AOR, or if wells are unlocatable, then provide a statement to that extent.
See 4 attachments (“[Item8&11 \[4attachements\]](#)”) which identify the search results performed through the New Mexico Office of the State Engineer website for area water wells. Please also see [Item8Supp. GoogleEarth JCT7 WtrWell.jpeg](#), which is a screen shot of GoogleEarth with the publicly available water well locations plotted for reference in relation to a 1mile radius circle of the proposed injector. There were no publicly locatable water wells located within 1 mile of the proposed injection well.
- Statement of qualified person endorsing the application, including name, title, and qualifications.

Jack Bradley – Geologist: Bachelors of Science in Geology (Sul Ross State University, 2009). 17years of industry experience with focus in the Permian Basin.

Ross Pearson, P.E. – Operations Engineer: Bachelor of Science in Petroleum Engineering (New Mexico Institute of Mining & Technology, 1984_TX License#70789). 36years of Industry experience with focus in the Permian Basin.

- Provide notice to the BLM of the application as per 19.15.2.7(A)(8)(d) NMAC.
Donna Sturdivant (Seguro Oil & Gas, LLC’s Regulatory Clerk) sent in a Sundry Notice to

the BLM but was advised to wait for NMOCD approval of the C-108. Please advise if this should be approached differently.

Additionally, at this time, UIC wells are not permitted to inject into two separate disposal intervals. Please rectify the application so only one interval is being applied for.

Please see new procedure and proposed wellbore diagram. ([_Item9Supp._JCT Federal 7 #1 convert well to water injection Devonian ONLY.doc](#) & [_Item3Supp._JCT 7#1 WBD 4-15-21 Proposed.pdf](#))

Once the requested additional information is received, staff will conduct a more thorough technical review of the application.

Please feel free to reach out should you there be any questions.

Regards,

Dylan Rose-Coss

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

C: (505) 372-8687



**JCT Federal & #7
(API = 30-025-38350)
2,100 FSL and 547' FEL
Section 7, T-9-S, R-38-E
Lea County, New Mexico
GL=3972' KB=3990'
KB=18' above GL**

Convert well to water injection

1. MIRU workover rig. Unseat pump and PU tubing. POOH and LD rods and pump. ND wellhead. NU BOP. POOH production tubing. Please note that the T.A.C. is set at 11,591', but the SN is at 3100'. Tubing could be corroded below the S.N. Check string wt prior to pulling out of the hole. Inspect well head for corrosion. Make sure wellhead will not be an issue during MIT test later in the procedure. Set tubing racks.
2. PU 4-3/4" used bit and 5.5" 17# casing scraper and RIH w/ production tubing. Hydrotest to tubing to 6,000 psig. RIH to +/- 11,655' or TD (plan to deliver 2 joints 2-7/8" tubing to location). POOH Leaving tubing in the derrick. LD bit and scraper. PU and RIH with treating packer. RIH and set packer at +/- 11,655'. Pressure up on the back side and confirm that the squeeze holes at 5680-82' and 8028' do not leak. Pump into existing perforations and determine injectivity (rate and pressure). POOH and LD production tubing. Send tubing to Western Falcon to line tubing with moderate temperature (160 degree F) poly-lined tubing.
3. MIRU wireline unit. PU and RIH with 3-3/8" casing guns. Re-perforate as follows: 11,674'-11,681' (6 spf 60 degree phasing). POOH and RD wireline unit. RDSU.
4. MIRUSU. ND wellhead, NU BOP. PU and RIH with Ni-Cr coated Arrow-set 1-X packer (Ni-Cr coated Baker Model "R" DG will also work). RIH with Western Falcon poly-lined 2-7/8" 6.4# IPC EUE injection string tubing. Set packer at +/-11,665'. Load back side with fresh water packer fluid. ND BOP, NU wellhead. Plan to have a new ring gasket on location. Test back side to 500 psig and run a chart for thirty minutes or per NMOCD regulations.
5. Be prepared to have enough produced water on location to run a step-rate test. MIRU Acid truck. Acidize perforations with 2,500 gallons 15%NEFE HCL and 2000 lbs of rock salt. Stage acid and rock salt in 500 gallon acid, 500 lbs rock salt. Flush perforations with produced water. Perform Step-rate test with acid truck on location. Start at NMOCD injection gradient pressure initially, and then move injection rate up in steps.

**JCT Federal & #7
(API = 30-025-38350)
2,100 FSL and 547' FEL
Section 7, T-9-S, R-38-E
Lea County, New Mexico
GL=3972', KB=3990'
KB=18' above GL**

Page 2 Convert well to injection

6. Re-configure the existing injection lines and be prepared to tie well in to the transferred or newly built injection facilities. Do not start injection unless the BLM and NMOCD have approved subject well for injection.

Seguro Oil & Gas, LLC

JCT Federal 7 #1

API: 30-025-38350

Lea Co., NM

Location: 2,100FSL & 547FEL of Section 7, T9S R38E

GL: 3,972ft ; KB: 3,990ft

Well Bore Diagram as of 4-15-2021 **Proposed WELL BORE DIAGRAM**



Spud: 6-21-2007

Comp: 9-29-2007

Formation Tops

Formation	Top MD	Top (SS)
Rustler:	2,338'	(+1,652')
Yates:	2,882'	(+1,108')
San Andres:	4,263'	(- 273')
Abo:	7,638'	(-3,648')
Wolfcamp:	8,810'	(-4,820')
Three Brothers:	9,246'	(-5,256')
Bough C:	9,492'	(-5,502')
Mississippian:	11,408'	(-7418')
Devonian:	11,669'	(-7,679')

17-1/2" Hole: 13 3/8" 48# NEW H-40
ST&C **csg set @ 519ft.** Cmdt 300sx
35:65:6'C' + 2% CaCl₂ + 0.25 ppsk
celloflake (1.97/12.5ppg). Tail with 200sx
"C" +2% CaCl₂ (1.33/14.8ppg). **Circulate**
175sx to pit. Test Csg to 600psi for 15min.
Held okay.

12-1/4" Hole: Ran 27jts 40# HCK & 88 JTS
40# J-55 LT&C **9-5/8" Csg set @ 5,118ft.**
CMT w/ 1500sx 50/50pox + 5%salt +
10%gel + 0.25ppsk celloflake (Slurry Vol:
654.51). Tail w/200sx neat (slurry vol:
47.73), **Circ 215sx to pits.**
Test csg to 1500psi for 15min. Held OKAY

SQZ (2nd): Perf: 9-18-2007 @ 5680-82ft, 2holes: Sqzd w/ 950sx; Lead
800sxs 50/50Poz, Tail: 150sx class C Neat. Circ Cmt to Surface.

SQZ (1st): Perf: 9-13-2007 @ 8028ft, 4holes: Sqzd w/ 1030sx;
Lead 930sxs 50/50Poz, Tail: 100sx class H Neat

Original TOC = 9114ft (CBL)
SQZ (1st) TOC = 5706ft (CBL)
SQZ (2nd) TOC = Surface

11656ft 2-7/8" 6.5# L-80 IPC Tubing

Arrow-set 1-X @ 11,665'

8-3/4" Hole: Run 5-1/2" 17# P110/N80
LT&C csg set @ 11,687ft.
Cmt 910sx 50:50:2-
P,H,Gel+5%Salt+3#/sx LCM
+5%FL252%SM.
(Wt: 14.2ppg, Yld=1.3, Wtr=5.57gal/sk)

Existing Perfs: 11,673.5 - 74.5ft, 1SPF; 11,676.6 - 77.6ft, 11,679.5 -
81ft, 4SPF.

TD: 11,687ft

1956 Book

Data prepared by: T.G. Kelliher, Jr.
 Affiliation: Warren Petroleum Corp.
 Date: 12-11-56

Field Name: Sawyer (Devonian)
 Location: T. 9 S., R. 38 E., Sec. 7
 County & State: Lea County, New Mexico

DISCOVERY WELL: Warren Pet. Corp. Fed. Simmons #1
 PAY ZONE: Devonian dolomite, medium coarse crystalline white and buff, with vuggy porosity.
 The original oil water contact was at a depth of 7,675 feet below sea level.

TYPICAL CORE ANALYSIS OF A PAY INTERVAL IN THIS FIELD: None available

Perm. in millidarcys		% Porosity	Liquid Saturation (% of pore space)	
Horizontal	Vertical		Water	Oil

OTHER SHOWS ENCOUNTERED IN THIS FIELD: The San Andres formation was cored and showed good signs of oil, but upon analysis proved to be non-productive.

TRAP TYPE: Faulted anticline

NATURE OF OIL: Gravity 42.7° A.P.I.

NATURE OF GAS:

NATURE OF PRODUCING ZONE WATER:

ppm	Total Solids	Na/K	Ca	Mg	Fe	SO ₄	Cl	CO ₂	HCO ₃	OH	H ₂ S
	93,666	29,573	1,200	778	G. Tr.	1,800	60,000		315		None

INITIAL FIELD PRESSURE: 4,607 psi.

TYPE OF DRIVE: Water drive.

NORMAL COMPLETION PRACTICES: Electric logs were run with guard logs and radioactivity logs through the Devonian. Production string was set into the pay and perforated.

PRODUCTION DATA:

No. of wells @ yr. end				Production		No. of wells @ yr. end				Production	
Year	Type	Prod.	Shut in or Abnd.	Oil in barrels Gas in MMCF		Year	Type	Prod.	Shut in or Abnd.	Oil in barrels Gas in MMCF	
				Annual	Cumulative					Annual	Cumulative
1941	oil					1949	oil				
	gas						gas				
1942	oil					1950	oil				
	gas						gas				
1943	oil					1951	oil				
	gas						gas				
1944	oil					1952	oil				
	gas						gas				
1945	oil					1953	oil				
	gas						gas				
1946	oil					1954	oil				
	gas						gas				
1947	oil					1955	oil	1		32,419	32,419
	gas						gas				
1948	oil					1956*	oil	1		25,400	57,819
	gas						gas				

* 1956 Figure is production to 5-1-56.

NOTE: No Devonian map is included. For nature of shallow structure refer to Sawyer (San Andres).



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest)

(NAD83 UTM in meters)

No records found.

Basin/County Search:

County: Lea

PLSS Search:

Township: 08S **Range:** 37E

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

2/25/21 1:57 PM

WATER COLUMN/ AVERAGE
DEPTH TO WATER



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)


(R=POD has been replaced,
O=orphaned,
C=the file is closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

POD Number	Code	POD Sub-basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	DepthWell	DepthWater	Water Column
L 13228 POD1		L	LE	3	4	2	30	08S	38E	669614	3621695	 200	60	140

Average Depth to Water: **60 feet**

Minimum Depth: **60 feet**

Maximum Depth: **60 feet**

Record Count: 1

Basin/County Search:

County: Lea

PLSS Search:

Township: 08S **Range:** 38E

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WATER COLUMN/ AVERAGE DEPTH TO WATER



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

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(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

POD Number	Code	POD Sub-basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	DepthWell	DepthWater	Water Column
L_03881		L	LE			1	05	09S	38E	678624	3715794*	70	40	30
L_14059 POD1		L	LE	3	2	3	31	09S	38E	677196	3706991	312	158	154
L_14171 POD1		L	LE	2	4	3	32	09S	38E	679003	3706894	285		

Average Depth to Water: **99 feet**

Minimum Depth: **40 feet**

Maximum Depth: **158 feet**

Record Count: 3

Basin/County Search:

County: Lea

PLSS Search:

Township: 09S **Range:** 38E

*UTM location was derived from PLSS - see Help

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WATER COLUMN/ AVERAGE DEPTH TO
WATER

Water Wells Identified with "Kcl" are from Lower Cretaceous aquifers

Closest water well found using New Mexico Office of State Engineer website. Formation: Unknown. Sec5 T9S-R38E. Top Wtr: 40ft

Approximate Boundary line for Ogallala aquifer

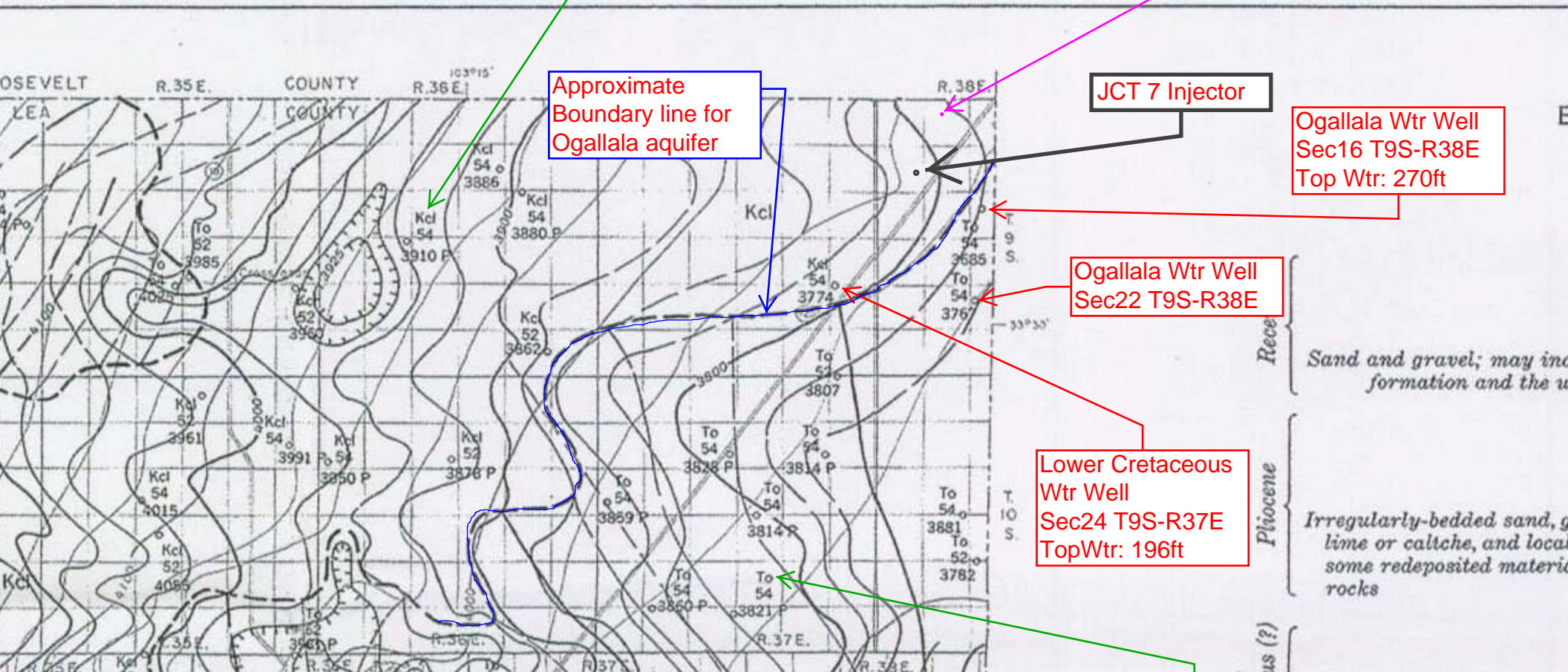
JCT 7 Injector

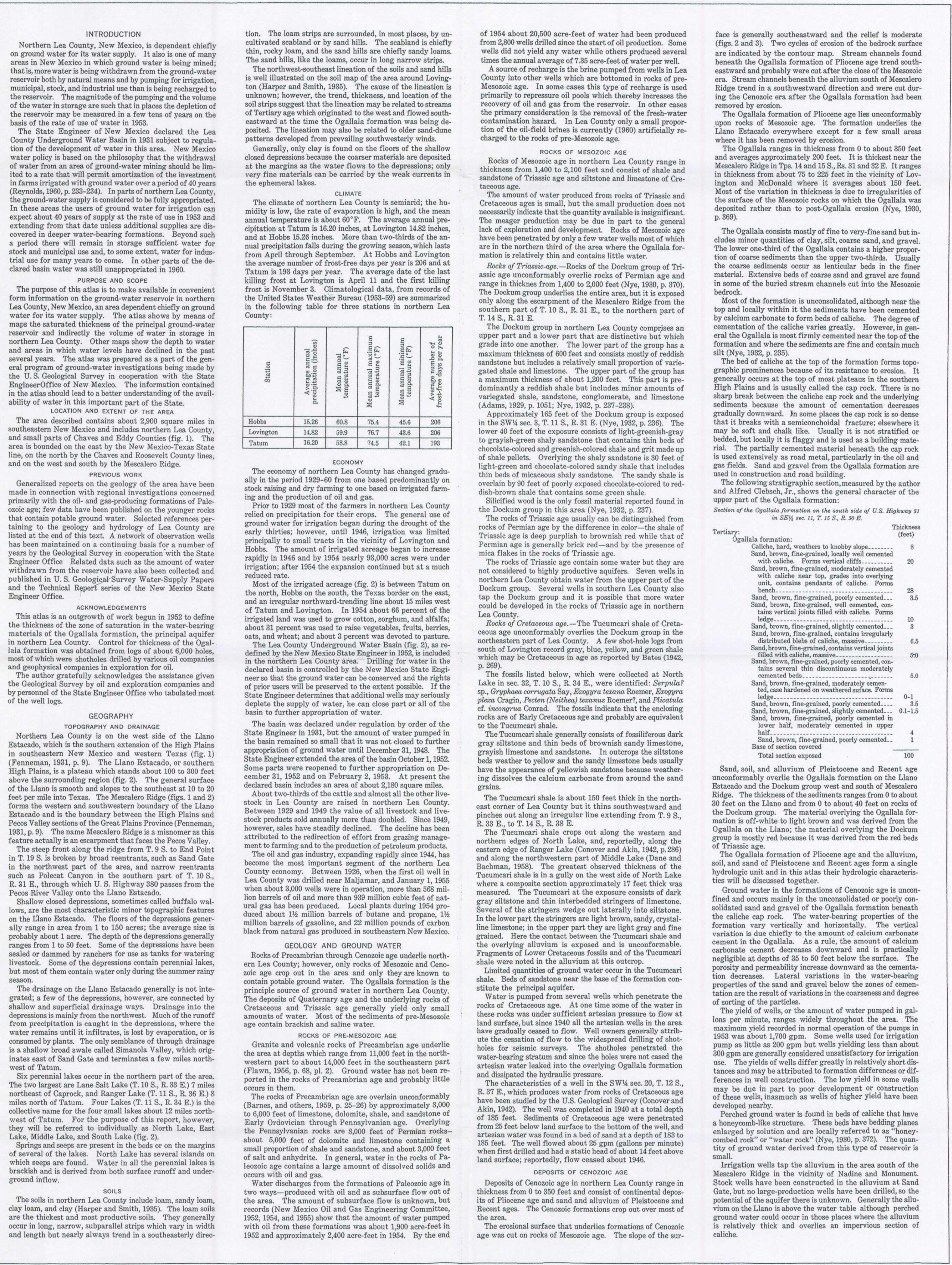
Ogallala Wtr Well
Sec16 T9S-R38E
Top Wtr: 270ft

Ogallala Wtr Well
Sec22 T9S-R38E

Lower Cretaceous
Wtr Well
Sec24 T9S-R37E
TopWtr: 196ft

Water Wells Identified with "To" are from the Ogallala aquifer





By
Sidney R. Ash
1963



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)








(R=POD has been replaced,
O=orphaned,
C=the file is closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

POD Number	Code	POD Sub-basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	DepthWell	DepthWater	Water Column
L 12174 POD1		L	LE	3	3	1	03	09S	37E	671884	3715421		244	
L 14231 POD1		L	LE	4	1	3	27	09S	37E	672285	3708474		18	
L 14231 POD2		L	LE	4	1	3	27	09S	37E	672259	3708473		26	
L 14231 POD3		L	LE	4	1	3	27	09S	37E	672259	3708473		30	
L 14231 POD4		L	LE	4	1	3	27	09S	37E	672285	3708474		18	
L 14231 POD5		L	LE	4	1	3	27	09S	37E	672259	3708473		30	
L 14777 POD1		L	LE	1	3	3	28	09S	37E	670317	3708208		158	130 28

Average Depth to Water: **130 feet**
 Minimum Depth: **130 feet**
 Maximum Depth: **130 feet**

Record Count: 7

Basin/County Search:

County: Lea

PLSS Search:

Township: 09S **Range:** 37E

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WATER COLUMN/ AVERAGE DEPTH TO WATER