

STATE OF NEW MEXICO
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES
OIL CONSERVATION DIVISION

2017 SEP 12 P 4: 31

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**APPLICATION OF BLACK RIVER WATER
MANAGEMENT COMPANY, LLC
TO AMEND ADMINISTRATIVE ORDER
SWD-1627 FOR A SALT WATER DISPOSAL
WELL IN EDDY COUNTY, NEW MEXICO.**

CASE NO. 15854

APPLICATION

Black River Water Management Company, LLC ("Black River"), OGRID No. 371287, through its undersigned attorneys, hereby files this application with the Oil Conservation Division pursuant to the provisions of N.M. Stat. Ann. § 70-2-17, for an order amending Administrative Order SWD-1682 to increase the diameter of the injection tubing in the subject well from 4-½ inches to 5-½ inches. *See* SWD-1682, attached hereto as Exhibit A. In support, Black River states the following:

1. On July 7, 2017, the Oil Conservation Division authorized Black River through Administrative Order SWD-1682 to use its Rustler Breaks SWD No. 2 well (API No. 30-015-44240) for disposal of oil field produced water through an open-hole interval within the Devonian formation from 13,700 feet to 14,700 feet.

2. The order further provides that injection is permitted through an "internally-coated, 4-½ inch or smaller tubing[.]"

3. Rustler Breaks SWD No. 2 well is located in Lot 4 (NW/4 NW/4 equivalent) of Irregular Section 6, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico.

4. Rustler Breaks SWD No. 2 well was spud on August 8, 2017, is currently being drilled, and injection has not yet commenced.

5. Black River seeks an amendment to Administrative Order SWD-1682 permitting it to use 5-½ inch injection tubing. The tubing will be placed inside the production casing.

6. All other approved well designs and permit conditions under Administrative Order SWD-1682 are proposed to remain unchanged.

7. The granting of this application will avoid the drilling of unnecessary wells, will prevent waste, and will protect correlative rights.

WHEREFORE, Black River requests that this application be set for hearing before an Examiner of the Oil Conservation Division on October 12, 2017, and, after notice and hearing as required by law, the Division enter an order approving this application to amend Administrative Order SWD-1682 to increase the diameter of the injection tubing in the Rustler Breaks SWD No. 2 well from 4-½ inches to 5-½ inches.

Respectfully submitted,

HOLLAND & HART LLP

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**ATTORNEYS FOR BLACK RIVER WATER
MANAGEMENT COMPANY, LLC**

CASE 15854:

Application of Black River Water Management Company, LLC to Amend Administrative Order SWD-1682 for a Salt Water Disposal Well Located in Eddy County, New Mexico. Applicant in the above-styled cause seeks an order amending Administrative Order SWD-1682 to permit increase the diameter of the injection tubing in its **Rustler Breaks SWD No. 2 well** (API No. 30-015-44240) from 4-½ inches to 5-½ inches. Administrative Order SWD-1682 currently only allows for tubing that is 4-½ inches or smaller. The subject well is located in Lot 4 (NW/4 NW/4 equivalent) of Irregular Section 6, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico. All other approved well designs and permit conditions under Administrative Order SWD-1682 are proposed to remain unchanged. The Rustler Breaks SWD No. 2 well is located approximately 4 miles northwest of Malaga, N.M.

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 Director
Oil Conservation Division



Administrative Order SWD-1682
July 7, 2017

**ADMINISTRATIVE ORDER
OF THE OIL CONSERVATION DIVISION**

Pursuant to the provisions of Division Rule 19 15 26 8B NMAC, Black River Water Management Company, LLC (the "operator") seeks an administrative order for its proposed Rustler Breaks SWD Well No 2 (API No 30-015-44240) to be located 1064 feet from the North line and 230 feet from the West line, Lot 4 (NW/4 NW/4 equivalent) of Irregular Section 6, Township 24 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 objection was received within the required suspense 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, Black River Water Management Company, LLC (OGRID 371287) is hereby authorized to utilize its proposed Rustler Breaks SWD Well No 2 (API No. 30-015-44240) to be located 1064 feet from the North line and 230 feet from the West line, Lot 4 (NW/4 NW/4 equivalent) of Irregular Section 6, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico, for disposal of oil field produced water (UIC Class II only) through an open-hole interval within Devonian formation from approximately 13700 feet to approximately 14700 feet. Injection shall occur through internally-coated tubing and a packer set a maximum of 100 feet above the top of the open-hole interval. Injection will occur through either an internally-coated, 4-1/2-inch or smaller tubing and a packer 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 Engineering Bureau 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.

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 well construction proposed in the application and any required modifications of construction as required by the Division.

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 liner to the bottom of the liner to demonstrate a good cement across the 7-5/8-inch liner, and good bond between the liner and the 10-3/4-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 2740 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 Division Director retains the right to require at any time the operator to 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 formation. 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 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 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.

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 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

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 disposal well that will be transferred prior to approving transfer of authority to inject

The Division may revoke this injection permit after notice and hearing if the operator is in violation of Rule 19.15 5 9 NMAC

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
Bureau of Land Management - Carlsbad
Well File - 30-015-44240