

**BEFORE THE OIL CONSERVATION COMMISSION
EXAMINER HEARING SEPTEMBER 13, 2018**

CASE No. 15073

EDDY COUNTY, NEW MEXICO



**Application of DCP Operating Company, LP to Re-Open Case No.
15073 to Amend Order No. R13809 to Remove the Request to
Remediate the Wells Identified in Paragraph 33,**

Lea County, NM

September 13, 2018

**NMOCC Hearing
Wendell Chino Building
1220 South St. Francis Drive
Santa Fe, NM 87501**

BEFORE THE OIL CONSERVATION

COMMISSION

Santa Fe, New Mexico

Exhibit No. 1

Submitted by: DCP OPERATING CO.

Hearing Date: September 13, 2018

Case No 15073

GEOLEX[®]
INCORPORATED

Background of DCP's Request to NMOCC

- Order R-13809 requires DCP to evaluate/potentially remediate four wells which offset Zia AGI#1
 - a. Delhi Federal-001 well (API No. 30-025-20025);
 - b. Lusk Deep Unit A-005 well (API No. 30-025-20122);
 - c. Gulf Federal-003 well (API No. 30-025-20876); and
 - d. Lusk Deep Unit-008 well (API No. 30-015-103 82).
- This presumed injection into the Delaware Mountain Group (DMG) of 15MMSCFD from Zia AGI#1 and an approved AGI D#2.
- Since the new AGI D#2 was drilled and completed in the Devonian, injection through the Zia AGI#1 into the DMG will be only minor and intermittent, therefore this requirement is no longer appropriate or necessary.
- Zia AGI#1 will inject only minor volumes during AGI D#2 maintenance and intermittently at other times to maintain working order and standby operational status.

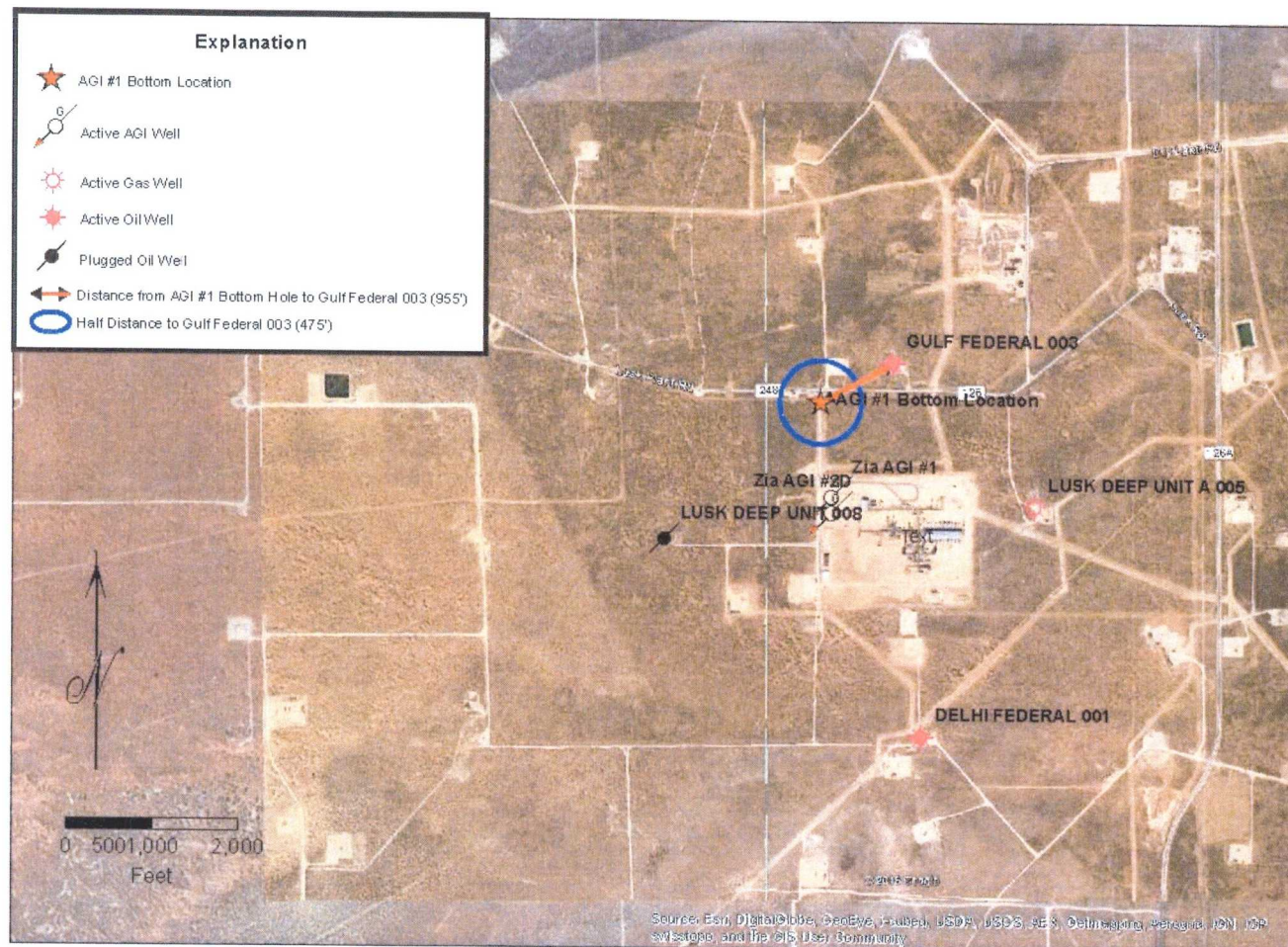
Analysis of Past and Possible Future Injection into AGI#1

- **Total** volume of TAG (98.8% CO₂ 0.2% H₂S) injected into DMG through AGI#1 is 1.45 BCF
- This injected volume represents a maximum plume radius of 185 ft and area of 2.5 acres
- Closest of the wells requiring evaluation is 955 feet away from AGI#1
- Even injection of 10 BCF only creates a 16.5 acre plume with 478' radius
- DCP intends to use AGI#1 generally as a backup when AGI D#2 must be shut down for maintenance or repair and at other times only intermittently to maintain working order and ensure standby operational status
- DCP tracks and reports total volume injected into all wells including AGI#1 every month to OCD via C-115 report
- Map showing extent of plume with 10 BCF total injection into AGI#1 is shown on following slide (Figure 2 of application)

Location of Zia AGI#1 and D#2 and Other Wells of Interest

Note maximum extent of 10 BCF plume relative to closest potentially affected well.

DCP will provide notice to OCD long prior to any potential effect of injection into AGI#1 reaching any possible well included in the investigation/remediation requirement of order R-13809.



Detailed Calculations of Actual Volumes Injected to Date and Plume Extent are Included in Exhibit A

- See Table 1 for Summary of TAG Injected into AGI#1
- See Table 2 for Plume Extent of Volume Injected to Date
- See Table 3 and Figure 2 for Extent of 10 BCF of Injection into AGI#1

DCP Proposes the Following Modification of NMOCC Order R-13809

- NMOCC withdraws the requirement to investigate/remediate the four wells listed in Paragraph 33 and delete the requirement for remedial action in Order Paragraph 3 due to limited DMG injection and where DCP will notify OCD if cumulative injection into AGI#1 reaches 9BCF.
- Should total injection into AGI#1 ever reach 9BCF, DCP will advise the Division in writing, and the Division may re-evaluate current conditions and determine if further work on these wells is appropriate.

Alberto A. Gutiérrez, C.P.G.

May 1, 2018

Mr. Phillip Goetze
NM Oil Conservation Division
1250 South St. Francis Drive
Santa Fe, NM 87501

RE: APPLICATION TO ADMINISTRATIVELY MODIFY OCD PARAGRAPH 33 REQUEST
IN ORDER R-13809

Dear Mr. Goetze:

Per our discussion, and on behalf of DCP Midstream, LP ("DCP"), enclosed please find an "Application for OCD to Administratively Modify its Paragraph 33 Request in NMOCC Order R-13809".

For the reasons set forth in the attached application, DCP and Geolex believe that the Division's requests reflected in Para. 33 of the Order have been obviated by events subsequent to the issuance of the order and are no longer necessary, and that the Division can modify its requests administratively as reflected in Section 5.0 of the attached application document. If the Division agrees with the administrative modification of the Division's requests, we have respectfully prepared and are providing for the Division's use a draft letter from the Division Director to DCP administratively modifying the Division's request reflected in background Para. 33 of R-13809.

We sincerely appreciate the Division's consideration of this application and request by DCP. If you or other Division staff have any questions or would like to meet to further discuss the enclosed application, please email me at aag@geolex.com or call me at 505-842-8000 office or 505-259-4283 cell.

Sincerely,
Geolex, Inc.



Alberto A. Gutierrez, RG
President
Consultant to DCP Midstream, LP

Enclosure

cc: Paul Tourangeau, DCP Midstream LP, Denver
Adam Rankin, Holland & Hart, Santa Fe

Projects/18-004/Correspondence/Goetze003.ltr.docx

**BEFORE THE OIL CONSERVATION
COMMISSION**
Santa Fe, New Mexico
Exhibit No. 2
Submitted by: **DCP OPEARTING CO.**
Hearing Date: September 13, 2018
Case No 15073

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Albuquerque, New Mexico 87102

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EXHIBIT A

Application for NMOCD to Administratively Modify Its Paragraph 33 Request Under OCC Order R-13809

1.0 EXECUTIVE SUMMARY

Under the New Mexico Oil Conservation Commission's (NMOCC) March 2014 Order R-13809, DCP Midstream, LP (now DCP Operating Company, LP, effective January 16, 2017) ("DCP") was approved to drill and inject two acid gas injection wells (AGI #1 and AGI #2) into the Permian Cherry Canyon and Brushy Canyon formations (Delaware zone) to dispose of approximately 15 MMSCFD of treated acid gases (TAG) from their new natural gas processing plant, known as the Zia II Gas Plant. Following the drilling, completion, and initial operations of the AGI #1, suboptimal reservoir performance led DCP to defer the drilling of the originally approved additional AGI #2, and DCP subsequently submitted an application for a deeper AGI well in the Devonian and lower zones to support the Zia II Gas Plant. This application was granted (Order R-14207) in September 2016, and the deeper well (AGI D#2) was completed and began successful injection in February of 2017. AGI #1 operates under the authority in R-13809 (2014) (as amended by R-13809-A to correct location of AGI #1) and AGI D#2 operates under the authority in R-14207 (2016).

The original Order (R-13809) required, among other conditions, the evaluation and potential remediation requested by the Division of four nearby wells that penetrated the proposed injection zone (Delaware zone), within 15 years or after the wells underwent workovers or were plugged and abandoned. *See* R-13809, ¶ 33.

Since the operations of AGI D#2 began, no injection has been conducted in the original AGI #1, and DCP plans to maintain and periodically operate this well to serve as a backup well during any short periods of maintenance or repair of AGI D#2.

As discussed in more detail in Section 2.0, below, AGI #1 was operated for 553 days at an average injection rate of approximately 2.6 MMSCFD of TAG, for a total injected TAG volume of approximately 1.4 BSCF.

The nearest of the four wells of concern (Gulf Federal 003) lies approximately 955 feet from the injection point of AGI #1. Calculations show that the amount of TAG required to reach half of the distance to the Gulf Federal 003 well (475 feet) would be approximately 10 BSCF, equivalent to approximately 10 years of continuous injection at the previous rate. Since regular, continuous injection is not contemplated for AGI #1, this volume of 10 BSCF will never be reached under any plausible scenario.

DCP Midstream hereby requests that the Division administratively modify the work requested by the Division in Order R-13809 to delete the remedial requirements regarding the four wells, since only minor, episodic injection will now occur in the zones of concern, at volumes on the order of a single digit percentage of the original anticipated rates. The requested administrative modification of the Division's requirements is reflected in Sec. 5.0.

EXHIBIT A

2.0 BACKGROUND

2.1 Original Order Provisions

In December 2013, DCP filed an application (Case No. 15073) seeking authority to inject treated acid gases ("TAG") consisting of carbon dioxide and hydrogen sulfide into the Permian Cherry Canyon and Brushy Canyon formations (Delaware zone) at depths of approximately 5,500 to 6,200 feet, using two new acid gas injection ("AGI") wells to be drilled in Section 19, Township 19 south, Range 32 East, N.M.P.M. in Lea County, New Mexico (Figure 1). These two wells were designed to permanently contain a total rate of approximately 15 MMSCFD of TAG generated from DCP's new, proposed natural gas processing plant ("Zia II Gas Plant") located in the same Section.

Following review of the application and an unopposed public hearing, on March 13, 2014, the New Mexico Oil Conservation Commission ("NMOCC") approved the application in Order R-13809 including, among other conditions, the following:

- A maximum total injection rate of 15.0 MMSCFD, at a maximum allowable operating pressure ("MAOP") of 2,233 pounds per square inch gauge ("psig")
- A good-faith effort to perform reasonable and prudent remedial work required by the Division on four wells identified by the Division: (i) the Delhi Federal 001 (API No. 3002520025), Lusk Deep Unit A-005 (API No. 3002520122), and Gulf Federal 003 (API No. 3002520876), working with the operators to enhance the isolation of the injection zones when the operator either works-over the well, plugs and abandons the well, or after 15 years from the date of the Order, whichever is sooner, and; (ii) a review of the available records pertaining to Lusk Deep Unit 008 (API No. 3001510382), and if remedial work is required, to be completed within 15 years.

2.2 DCP Actions

Following the approval of Order R-13809, DCP proceeded to drill, test and complete the first well, now named DCP Midstream Zia AGI #1 (API No. 3002542208). The well was spudded on December 23, 2014, at the approved location (2,100' FSL, 950' FWL in Section 19, Township 19 south, Range 32 East) and was deviated, per plan, to a bottom hole location of 2,090' FNL, 826' FWL in the same Section, approximately 1,000 feet north of the surface location. The completed well had a true vertical depth (TVD) of 6,158 feet and a true measured depth (TMD) of 6,158 feet. The well was placed in service in September of 2015.

Subsequent operational pressure and volume data showed the AGI #1 was suboptimal with respect to its intended injection capacity, due in part to lower than anticipated permeability in the Cherry Canyon and Brushy Canyon formations. DCP investigated the injection potential for deeper zones, and selected the units in the Devonian and Upper Silurian Wristen and Fusselman formations.

EXHIBIT A

DCP then filed an application with the NMOCC in July 2016 (Case No. 15528) for authorization to inject in the deeper zones (Devonian and Upper Silurian Wristen/Fusselman). On September 6, 2016, the application was approved under Order R-14207 for the new well, designated as DCP AGI D#2. This Order did not include any conditions regarding the four wells identified in Order R-13809.

The AGI D#2 (API No. 3002542207) was spudded on November 2, 2016, at 1,893 feet from the south line (FSL) and 950 feet from the west line (FWL) in the same Section of AGI #1 (Figure 2). The well was drilled vertically to a TVD of 14,750 feet and was cased to a TVD of 13,622 feet, with an open-hole completion of approximately 1,100 feet. Following testing and evaluation, the well was placed in service in February 2017.

Following the successful operation of Zia AGI D#2, the original AGI #1 was placed on standby status to be used generally as a backup well. DCP Midstream is now confident that AGI D#2 will be capable of injecting the entire anticipated TAG flow of 15 MMSCFD, and only plans to keep AGI #1 in working order to be used as a backup well during any maintenance or repairs of AGI D#2.

3.0 OPERATIONAL PLANS FOR AGI SYSTEM

The AGI D#2 well will be used on a regular basis as testing and recent operations show that this well can take the entire TAG flow of 15 MMSCFD without exceeding the MAOP.

There are several reasons for keeping AGI #1 in operational standby status. First, the plant's air permit requires two working AGI wells to ensure reliable and consistent injection of the Zia Gas Plant's TAG volume. Second, DCP intends to keep AGI #1 as a redundant back-up well to be used should there be a problem or maintenance issue with AGI D#2, to promote plant operational reliability. With this in mind, DCP will operate AGI #1 intermittently to ensure that it remains operational.

4.0 ANALYSIS OF INJECTION INTO AGI #1 FROM START-UP THROUGH FEBRUARY 2017

4.1 Analysis of Previous Injection into AGI #1

Table 1 shows that from August of 2015 through February 2017, AGI #1 was in operation for a total of 553 days, at injection rates ranging from 1.61 to 3.67 MMSCFD, with an average injection rate of 2.6 MMSCFD. The total amount of injected TAG was 1,449.8 MMSCF, or 1.4 BSFC.

Analysis shows that the TAG is almost entirely CO₂ (98.8% CO₂ and 0.2% H₂S, with approximately 1.0% miscellaneous hydrocarbons).

Table 2 shows the calculated radius of eighteen months of injected TAG migration in the Cherry Canyon and Brushy Canyon formations. These calculations indicate that the TAG plume only migrated approximately 186 feet from the bottom hole injection point after the 553 days of injection at the average rate of 2.6 MMSCFD.

EXHIBIT A

4.2 Analysis of Projected Future Injection into AGI #1

In Order R-13809 the Division identified four production wells penetrating the Delaware formation in the general vicinity of AGI #1, and the Order requests an assessment for potential remediation or additional isolation work associated with those four wells in the Delaware formation. The Division's request is reflected in background Paragraph 33 of the Order.

The nearest of the four wells of interest is the Gulf Federal 003, which lies approximately 950 feet northeast of the bottom hole injection point of AGI #1 (Figure 2). Table 3 provides the calculations that indicate that a volume of over 10 BCF will be required for the TAG to migrate from the bottom hole location of AGI #1 to one half of the distance (475 feet) to the Gulf Federal 003. Figure 2 shows a blue circle representing half the distance from Zia AGI#1 to the Gulf Federal 003 within which a total TAG volume of 10 BCF would be contained. At the average injection rate used prior to ceasing injection (2.6 MMSCFD), approximately nine years of continuous injection would be required to reach 10 BCF (including the 1.5 BSCF injected to date). AGI #1 will never see a rate equivalent to even 5% of that rate per annum, if that. Accordingly, there is no practicable possibility that the four identified wells would ever need any assessment or potential remediation/ isolation since TAG from AGI#1 will never reach even the closest well (Gulf Federal 003).

5.0 REQUESTED MODIFICATION OF DIVISION REQUIREMENTS

In summary, DCP will maintain AGI #1 as an operational well, to be used generally as a back-up well, consistent with the existing permits, and to allow plant operations to continue should maintenance and/or repairs be required for AGI D#2. Modeling and calculations have shown that, even at a total injected volume of 10 BSCF, TAG from the AGI #1 will be contained within less than half of the distance to the nearest well of concern (Gulf Federal 003). Accordingly, DCP will commit to notify the Division if injection into AGI #1 were ever to reach 9 BSCF, at which point the Division and DCP can re-evaluate the status of the four offsetting wells of concern and any remedial actions deemed appropriate. The Division currently receives and will continue to receive monthly reports of any volume of TAG injected into AGI #1 via C-115 reporting and quarterly through the injection data reports required under R-13809, confirming whether injection volumes into AGI#1 reach the notification threshold of 9 BSCF.

DCP respectfully requests, therefore, that the Division administratively modify its requirements under Order R-13809 to reflect that:

1. The Division's concerns, which led the NMOCC to incorporate the requirement to address Division's request to investigate and/or remediate the four wells identified in Paragraph 3 of Order R-13809, are obviated by the lack of injection into AGI #1 as it will generally serve as a backup injection well. The Division's request to conduct remedial work, outlined in Paragraph 33 of Order R-13809, is thus withdrawn by the Division.
2. Instead, the Division requests that DCP notify the Division in writing if injection into AGI#1 ever reaches 9 BSCF, at which point the Division may re-evaluate the condition and status of the four offsetting wells identified in Order R-13809 and any remedial actions deemed appropriate.

EXHIBIT A

TABLES

EXHIBIT A

Table 1: Summary of TAG Injection, 2015-2017			
Dates	Number of Days	Average Injection Flow Rate MMSCFD	Volume Injected (MMSCF)
8-24-15 through 12-31-15	130	2.03	263.9
1-1-16 through 3-31-16	90	2.38	214.2
4-1-16 through 6-30-16	91	3.67	333.97
7-1-16 through 9-30-16	92	3.1	285.2
10-1-16 through 12-31-16	91	2.83	257.53
1-1-17 through 2-28-17	59	1.61	94.99
TOTALS	553		1,449.8
Average Injection Rate (MMSCFD)			2.6

EXHIBIT A

Table 2: Pressure and Volume Calculations of Injected TAG, Zia AGI #1

PROPOSED INJECTION STREAM CHARACTERISTICS

TAG	H ₂ S	CO ₂	H ₂ S	CO ₂	TAG
Gas vol	conc.	conc.	inject rate	inject rate	inject rate
MMSCFD	mol %	mol %	lb/day	lb/day	lb/day
1500	0.2	98.8	284768	181658123	181942891

CONDITIONS AT WELL HEAD

Well Head Conditions		TAG							
Temp	Pressure	Gas vol	Comp	Inject Rate	Density ¹	SG ²	density	volume	volume
F	psi	MMSCFD	CO ₂ :H ₂ S	lb/day	kg/m ³		lb/gal	ft ³	bbl
100	1200	1500	99:0	181942891	379.00	0.38	3.16	7686131	1368954

CONDITIONS AT BOTTOM OF WELL

Injection Zone Conditions					TAG				
Temp	Pressure ³	Depth _{top}	Depth _{bottom}	Thickness ⁴	Density ¹	SG ²	density	volume	volume
F	psi	ft	ft	ft	kg/m ³		lb/gal	ft ³	bbl
120	2400	5750	6170	420	728.00	0.73	6.08	4001434	712684

CONDITIONS IN RESERVOIR AT EQUILIBRIUM

Injection Reservoir Conditions					TAG				
Temp ⁵	Pressure ³	Ave. Porosity ⁶	Swr	Porosity	Density ¹	SG ²	density	volume	volume
F	psi	%		ft	kg/m ³		lb/gal	ft ³	bbl
120	2400	15.0	0.41	37.17	728.00	0.73	6.08	4001434	712684

CONSTANTS

	SCF/mol	
Molar volume at STD	0.7915	
	g/mol	lb/mol
Molar weight of H ₂ S	34.0809	0.0751
Molar weight of CO ₂	44.0096	0.0970
Molar weight of H ₂ O	18.015	0.0397

¹ Density calculated using AQUALIBrium software

² Specific gravity calculated assuming a constant density for water

³ PP is extrapolated using successful Drill Stem Tests at nearby wells

⁴ Thickness is the average total thickness of coarse sand units in the reservoir zone

⁵ Reservoir temp. is extrapolated from bottomhole temp. measured at nearby wells

⁶ Porosity is estimated using geophysical logs from nearby wells

CALCULATION OF MAXIMUM INJECTION PRESSURE LIMITATION

SG _{TAG}	0.5535
PG = 0.2 + 0.433 (1.04-SG _{TAG})	0.411 psi/ft
IP _{max} = PG *Depth	2361 psi

Where: SG_{TAG} is specific gravity of TAG; PG is calculated pressure gradient; and IP_{max} is calculated maximum injection pressure.

CALCULATION OF 30 YEAR AREA OF INJECTION

Cubic Feet/day (5.6146 ft ³ /bbl)	4,001,434 ft ³
Cubic Feet	4,001,434 ft ³
Area = V/Net Porosity (ft)	107652 ft ²
Area = V/Net Porosity (ft) (43560 ft ² /acre)	2.5 acres
Radius =	185 ft
Radius =	0.04 miles

EXHIBIT A

Table 3: Projected Pressure and Volume Calculations for TAG, Zia AGI #1

PROPOSED INJECTION STREAM CHARACTERISTICS

TAG	H ₂ S	CO ₂	H ₂ S	CO ₂	TAG
Gas vol	conc.	conc.	inject rate	inject rate	inject rate
MMSCFD	mol %	mol %	lb/day	lb/day	lb/day
10000	0.2	98.8	1898454	1211054154	1212952608

CONDITIONS AT WELL HEAD

Well Head Conditions		TAG							
Temp	Pressure	Gas vol	Comp	Inject Rate	Density ¹	SG ²	density	volume	volume
F	psi	MMSCFD	CO ₂ :H ₂ S	lb/day	kg/m ³		lb/gal	ft ³	bbl
100	1200	10000	99:0	1212952608	379.00	0.38	3.16	51240876	9126363

CONDITIONS AT BOTTOM OF WELL

Injection Zone Conditions					TAG				
Temp	Pressure ³	Depth _{top}	Depth _{bottom}	Thickness ⁴	Density ¹	SG ²	density	volume	volume
F	psi	ft	ft	ft	kg/m ³		lb/gal	ft ³	bbl
120	2400	5750	6170	420	728.00	0.73	6.08	26676225	4751225

CONDITIONS IN RESERVOIR AT EQUILIBRIUM

Injection Reservoir Conditions					TAG				
Temp ⁵	Pressure ³	Ave. Porosity ⁶	Swr	Porosity	Density ¹	SG ²	density	volume	volume
F	psi	%		ft	kg/m ³		lb/gal	ft ³	bbl
120	2400	15.0	0.41	37.17	728.00	0.73	6.08	26676225	4751225

CONSTANTS

	SCF/mol	
Molar volume at STD	0.7915	
	g/mol	lb/mol
Molar weight of H ₂ S	34.0809	0.0751
Molar weight of CO ₂	44.0096	0.0970
Molar weight of H ₂ O	18.015	0.0397

CALCULATION OF MAXIMUM INJECTION PRESSURE LIMITATION

SG _{TAG}	0.5535
PG = 0.2 + 0.433 (1.04-SG _{TAG})	0.411 psi/ft
IP _{max} = PG * Depth	2361 psi

Where: SG_{TAG} is specific gravity of TAG; PG is calculated pressure gradient; and IP_{max} is calculated maximum injection pressure.

CALCULATION OF 30 YEAR AREA OF INJECTION

Cubic Feet/day (5.6146 ft ³ /bbl)	26,676,225 ft ³
Cubic Feet	26,676,225 ft ³
Area = V/Net Porosity (ft)	717682 ft ²
Area = V/Net Porosity (ft) (43560 ft ² /acre)	16.5 acres
Radius =	478 ft
Radius =	0.09 miles

¹ Density calculated using AQUALibrium software

² Specific gravity calculated assuming a constant density for water

³ PP is extrapolated using successful Drill Stem Tests at nearby wells

⁴ Thickness is the average total thickness of coarse sand units in the reservoir zone

⁵ Reservoir temp. is extrapolated from bottomhole temp. measured at nearby wells

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EXHIBIT A

FIGURES

EXHIBIT A

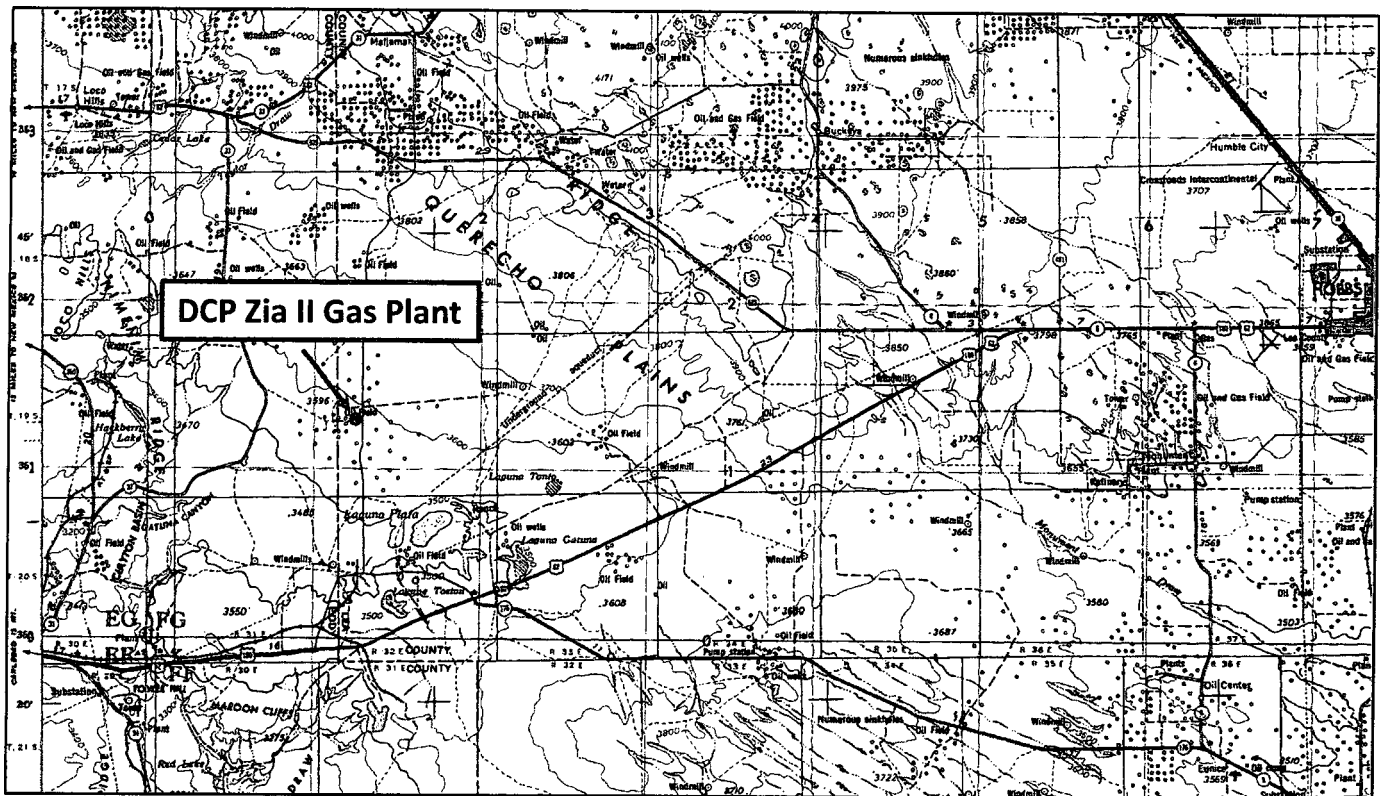


Figure 1: Location of the DCP Zia II Gas Plant.
(USGS 1:250,000)

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Midstream

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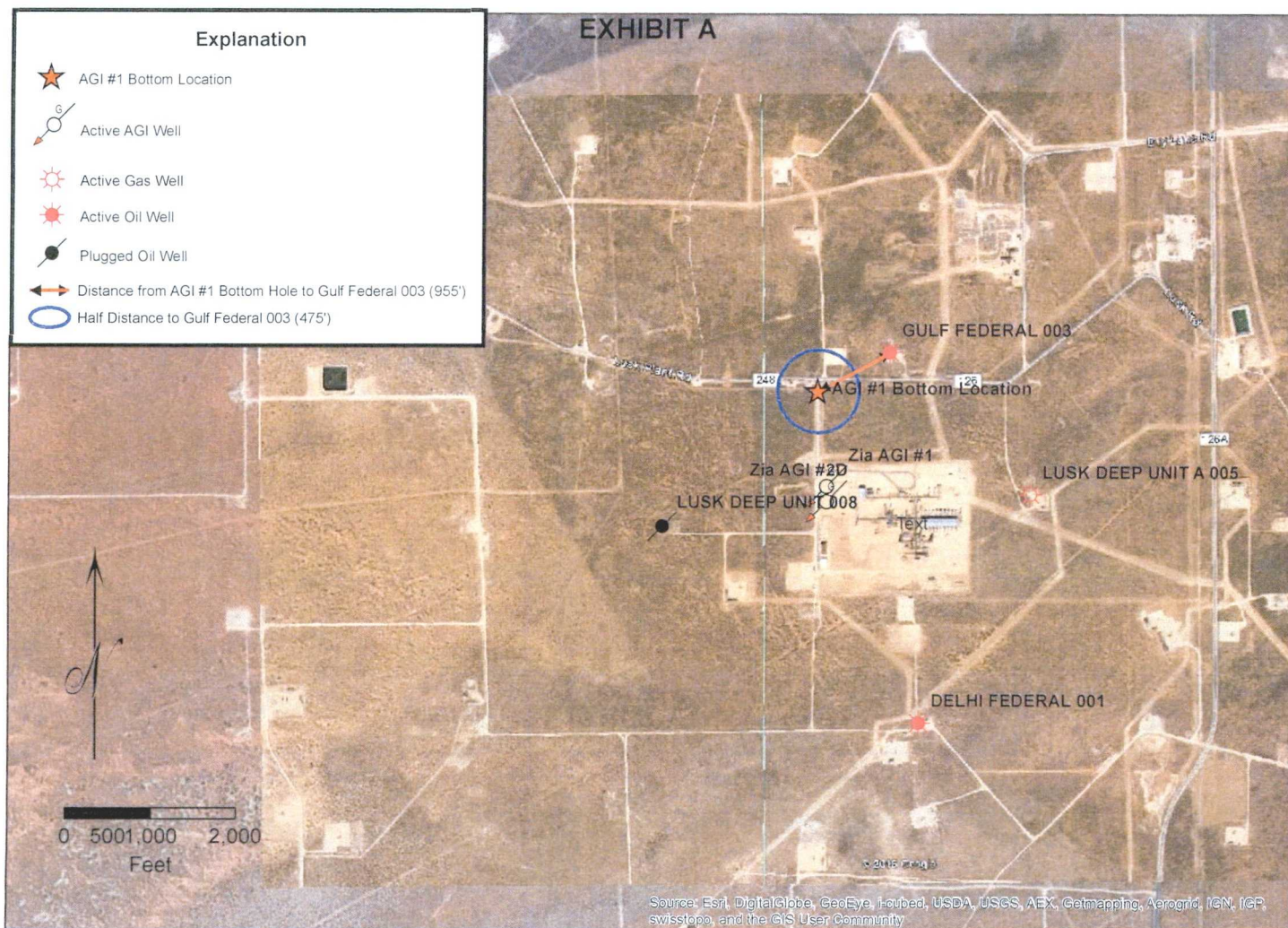


Figure 2: Locations of Zia AGI #1 and D#2, and Other Wells of Interest

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

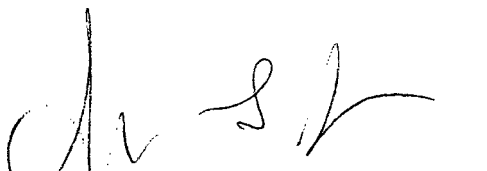
**APPLICATION OF CDP OPERATING COMPANY, LP
TO RE-OPEN CASE NO. 15073 TO AMEND ORDER
NO. R-13809 TO REMOVE THE REQUEST TO REMEDIATE
THE WELLS IDENTIFIED IN PARAGRAPH 33,
LEA COUNTY, NEW MEXICO.**

**CASE NO. 15073
ORDER NO. R-13809**

AFFIDAVIT

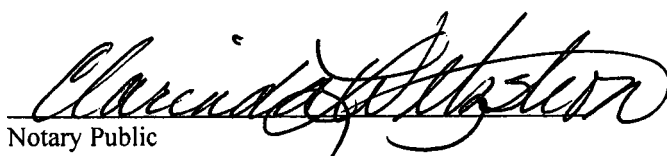
STATE OF NEW MEXICO)
) ss.
COUNTY OF SANTA FE)

Jordan L. Kessler, attorney in fact and authorized representative of DCP Operating Company, LP the Applicant herein, being first duly sworn, upon oath, states that the above-referenced Applications have been provided under the notice letters and proof of receipts attached hereto.



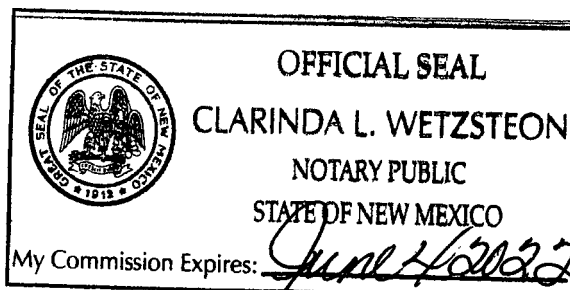
Jordan L. Kessler

SUBSCRIBED AND SWORN to before me this 6th day of September 2018 by Jordan L. Kessler.



Notary Public

My Commission Expires:



BEFORE THE OIL CONSERVATION
COMMISSION
Santa Fe, New Mexico
Exhibit No. 3
Submitted by: **DCP OPEARTING CO.**
Hearing Date: September 13, 2018
Case No 15073

HOLLAND & HART^{LLP}



Adam G. Rankin
Associate
Phone (505) 988-4421
Fax (505) 983-6043
AGRankin@hollandhart.com

August 21, 2018

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

TO: AFFECTED PARTIES

Re: Application of DCP Operating Company, LP to Re-Open Case No. 15073 to Amend Order R-13809 to Remove the Request to Remediate the Wells Identified in Paragraph 33, Lea County, New Mexico.

Ladies and Gentlemen:

This letter is to advise you that DCP Operating Company, LP has filed the enclosed application with the New Mexico Oil Conservation Commission. This application has been set for hearing before a Division Examiner at 9 a.m. on September 13, 2018. The hearing will be held in Porter Hall in the Oil Conservation Division's Santa Fe Offices located at 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505. You are not required to attend this hearing, but as an owner of an interest that may be affected by this application, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from challenging the matter at a later date.

Parties appearing in cases are required by Division Rule 19.15.4.13.B to file a Pre-hearing Statement four days in advance of a scheduled hearing. This statement must be filed at the Division's Santa Fe office at the above specified address and should include: the names of the parties and their attorneys; a concise statement of the case; the names of all witnesses the party will call to testify at the hearing; the approximate time the party will need to present its case; and identification of any procedural matters that are to be resolved prior to the hearing.

Sincerely,


Adam G. Rankin
ATTORNEYS FOR DCP OPERATING COMPANY, LP

Holland & Hart^{LLP}

Phone (505) 988-4421 **Fax** (505) 983-6043 **www.hollandhart.com**

110 North Guadalupe Suite 1 Santa Fe, New Mexico 87501 **Mailing Address** P.O. Box 2208 Santa Fe, NM 87504-2208

Aspen Boulder Carson City Colorado Springs Denver Denver Tech Center Billings Boise Cheyenne Jackson Hole Las Vegas Reno Salt Lake City Santa Fe Washington, D.C. ☎

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August , 2018

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

TO: AFFECTED PARTIES

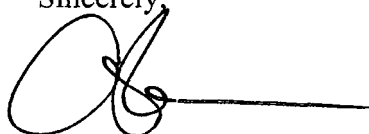
Re: Application of DCP Operating Company, LP to Re-Open Case No. 15073 to Amend Order R-13809 to Remove the Request to Remediate the Wells Identified in Paragraph 33, Lea County, New Mexico.

Ladies and Gentlemen:

This letter is to advise you that DCP Operating Company, LP has filed the enclosed application with the New Mexico Oil Conservation Commission. This application has been set for hearing before a Division Examiner at 9 a.m. on September 13, 2018. The hearing will be held in Porter Hall in the Oil Conservation Division's Santa Fe Offices located at 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505. You are not required to attend this hearing, but as an owner of an interest that may be affected by this application, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from challenging the matter at a later date.

Parties appearing in cases are required by Division Rule 19.15.4.13.B to file a Pre-hearing Statement four days in advance of a scheduled hearing. This statement must be filed at the Division's Santa Fe office at the above specified address and should include: the names of the parties and their attorneys; a concise statement of the case; the names of all witnesses the party will call to testify at the hearing; the approximate time the party will need to present its case; and identification of any procedural matters that are to be resolved prior to the hearing.

Sincerely,

A handwritten signature in black ink, appearing to be 'Adam G. Rankin', with a long horizontal line extending to the right.

Adam G. Rankin

ATTORNEYS FOR DCP OPERATING COMPANY, LP

	A	B	F	G	I	J	K
1	MailClass	TrackingNo	ToName	DeliveryAddress	City	State	Zip
2	Certified with Return Receipt (Signature)	9414810898765017249630	Apache Corporation	2000 Post Oak Blvd, Suite 100	Houston	TX	77056
3	Certified with Return Receipt (Signature)	9414810898765017249241	Apache Corporation	2000 Post Oak Blvd, Suite 100	Houston	TX	77056
4	Certified with Return Receipt (Signature)	9414810898765016858789	Apache Corporation	2000 Post Oak Blvd, Suite 100	Houston	TX	77056
5	Certified with Return Receipt (Signature)	9414810898765017249722	Devon Energy Corporation	20 N Broadway Ave	Oklahoma City	Ok	73102
6	Certified with Return Receipt (Signature)	9414810898765017249333	Devon Energy Corporation	20 N Broadway Ave	Oklahoma City	Ok	73102
7	Certified with Return Receipt (Signature)	9414810898765016858895	Devon Energy Corporation	20 N Broadway Ave	Oklahoma City	Ok	73102
8	Certified with Return Receipt (Signature)	9414810898765017249746	Dan Wallace Irwin, ssp	118 N Grant St	Hinsdale	IL	60521
9	Certified with Return Receipt (Signature)	9414810898765017249340	Dan Wallace Irwin, ssp	118 N Grant St	Hinsdale	IL	60521
10	Certified with Return Receipt (Signature)	9414810898765016858901	Dan Wallace Irwin, ssp	118 N Grant St	Hinsdale	IL	60521
11	Certified with Return Receipt (Signature)	9414810898765017249753	McVey Dilling Co	PO Box 2450	Hobbs	NM	88241
12	Certified with Return Receipt (Signature)	9414810898765017249357	McVey Dilling Co	PO Box 2450	Hobbs	NM	88241
13	Certified with Return Receipt (Signature)	9414810898765016858918	McVey Dilling Co	PO Box 2450	Hobbs	NM	88241
14	Certified with Return Receipt (Signature)	9414810898765017249760	OXY Y-1	PO Box 27570	Houston	TX	77227
15	Certified with Return Receipt (Signature)	9414810898765017249364	OXY Y-1	PO Box 27570	Houston	TX	77227
16	Certified with Return Receipt (Signature)	9414810898765016858925	OXY Y-1	PO Box 27570	Houston	TX	77227
17	Certified with Return Receipt (Signature)	9414810898765017249777	Oxy USA Inc	PO Box 4294	Houston	TX	77210
18	Certified with Return Receipt (Signature)	9414810898765017249371	Oxy USA Inc	PO Box 4294	Houston	TX	77210
19	Certified with Return Receipt (Signature)	9414810898765016858932	Oxy USA Inc	PO Box 4294	Houston	TX	77210
20	Certified with Return Receipt (Signature)	9414810898765017249784	Prize Energy Resources, L.P.	20 E 5th St Suite 1400	Tulsa	OK	74103
21	Certified with Return Receipt (Signature)	9414810898765017249388	Prize Energy Resources, L.P.	20 E 5th St Suite 1400	Tulsa	OK	74103
22	Certified with Return Receipt (Signature)	9414810898765016858949	Prize Energy Resources, L.P.	20 E 5th St Suite 1400	Tulsa	OK	74103
23	Certified with Return Receipt (Signature)	9414810898765017249791	Kathleen Irwin Schuster	3213 Pepperwood Land	Ft. Collings	CO	80525
24	Certified with Return Receipt (Signature)	9414810898765017249395	Kathleen Irwin Schuster	3213 Pepperwood Land	Ft. Collings	CO	80525
25	Certified with Return Receipt (Signature)	9414810898765016858956	Kathleen Irwin Schuster	3213 Pepperwood Land	Ft. Collings	CO	80525
26	Certified with Return Receipt (Signature)	9414810898765017249807	Seven Rivers	PO Box 1598	Carlsbad	NM	88220
27	Certified with Return Receipt (Signature)	9414810898765017249401	Seven Rivers	PO Box 1598	Carlsbad	NM	88220
28	Certified with Return Receipt (Signature)	9414810898765016858963	Seven Rivers	PO Box 1598	Carlsbad	NM	88220
29	Certified with Return Receipt (Signature)	9414810898765017249814	Tandem Energy Corporation	200 N Loraine Suite 500	Midland	TX	79701
30	Certified with Return Receipt (Signature)	9414810898765017249418	Tandem Energy Corporation	200 N Loraine Suite 500	Midland	TX	79701
31	Certified with Return Receipt (Signature)	9414810898765016858994	Tandem Energy Corporation	200 N Loraine Suite 500	Midland	TX	79701
32	Certified with Return Receipt (Signature)	9414810898765017249821	NM Bureau of Land Management	1474 Rodeo Road	Santa Fe	NM	87505
33	Certified with Return Receipt (Signature)	9414810898765017249425	NM Bureau of Land Management	1474 Rodeo Road	Santa Fe	NM	87505
34	Certified with Return Receipt (Signature)	9414810898765016859007	NM Bureau of Land Management	1474 Rodeo Road	Santa Fe	NM	87505
35	Certified with Return Receipt (Signature)	9414810898765017249647	Big Three Energy Group	1801 W 2nd St	Roswell	NM	88201
36	Certified with Return Receipt (Signature)	9414810898765017249258	Big Three Energy Group	1801 W 2nd St	Roswell	NM	88201
37	Certified with Return Receipt (Signature)	9414810898765016858796	Big Three Energy Group	1801 W 2nd St	Roswell	NM	88201
38	Certified with Return Receipt (Signature)	9414810898765017249838	Walfam Limited	1811 Heritage Blvd Suite 200	Midland	TX	79707
39	Certified with Return Receipt (Signature)	9414810898765017249432	Walfam Limited	1811 Heritage Blvd Suite 200	Midland	TX	79707
40	Certified with Return Receipt (Signature)	9414810898765016859014	Walfam Limited	1811 Heritage Blvd Suite 200	Midland	TX	79707
41	Certified with Return Receipt (Signature)	9414810898765017249845	WK Land Company	911 Kimbark St	Longmont	CO	80501
42	Certified with Return Receipt (Signature)	9414810898765017249449	WK Land Company	911 Kimbark St	Longmont	CO	80501
43	Certified with Return Receipt (Signature)	9414810898765016859038	WK Land Company	911 Kimbark St	Longmont	CO	80501
44	Certified with Return Receipt (Signature)	9414810898765017249654	Chase Oil Corporation	PO Box 1767	Artesia	NM	88211
45	Certified with Return Receipt (Signature)	9414810898765017249265	Chase Oil Corporation	PO Box 1767	Artesia	NM	88211
46	Certified with Return Receipt (Signature)	9414810898765016858802	Chase Oil Corporation	PO Box 1767	Artesia	NM	88211
47	Certified with Return Receipt (Signature)	9414810898765017249661	Chisos, Ltd	670 Dona Ana Rd SW	Deming	NM	88030
48	Certified with Return Receipt (Signature)	9414810898765017249272	Chisos, Ltd	670 Dona Ana Rd SW	Deming	NM	88030

	N	R	U
1	MailDate	ERR_SigDate	USPS_Status
2	08/27/2018		Your package will arrive later than expected, but is still on its way. It is currently in transit to the next facility.
3	08/27/2018		A shipping label has been prepared for your item at 4:37 pm on August 27, 2018 in COMMERCE CITY, CO 80022. This does not indicate receipt by the USPS or the actual mailing date.
4	08/21/2018		Your package is moving within the USPS network and is on track to be delivered to its final destination. It is currently in transit to the next facility.
5	08/27/2018	09/03/2018	Your item was delivered at 8:11 am on August 30, 2018 in OKLAHOMA CITY, OK 73102.
6	08/27/2018		A shipping label has been prepared for your item at 4:37 pm on August 27, 2018 in COMMERCE CITY, CO 80022. This does not indicate receipt by the USPS or the actual mailing date.
7	08/21/2018	09/03/2018	Your item was delivered at 7:52 am on August 31, 2018 in OKLAHOMA CITY, OK 73102.
8	08/27/2018		Your package will arrive later than expected, but is still on its way. It is currently in transit to the next facility.
9	08/27/2018		A shipping label has been prepared for your item at 4:37 pm on August 27, 2018 in COMMERCE CITY, CO 80022. This does not indicate receipt by the USPS or the actual mailing date.
10	08/21/2018	09/03/2018	Your item was delivered at 12:17 pm on September 1, 2018 in HINSDALE, IL 60521.
11	08/27/2018	09/03/2018	Your item was delivered at 11:09 am on August 30, 2018 in HOBBS, NM 88240.
12	08/27/2018		A shipping label has been prepared for your item at 4:37 pm on August 27, 2018 in COMMERCE CITY, CO 80022. This does not indicate receipt by the USPS or the actual mailing date.
13	08/21/2018	09/03/2018	Your item was delivered at 11:09 am on August 30, 2018 in HOBBS, NM 88240.
14	08/27/2018		All sorting has been completed at the delivery unit for today's deliveries at 8:58 am on September 1, 2018 in HOUSTON, TX 77227.
15	08/27/2018		A shipping label has been prepared for your item at 4:37 pm on August 27, 2018 in COMMERCE CITY, CO 80022. This does not indicate receipt by the USPS or the actual mailing date.
16	08/21/2018		All sorting has been completed at the delivery unit for today's deliveries at 8:58 am on September 1, 2018 in HOUSTON, TX 77227.
17	08/27/2018		Your item arrived at the HOUSTON, TX 77210 post office at 11:44 am on August 31, 2018 and is ready for pickup.
18	08/27/2018		A shipping label has been prepared for your item at 4:37 pm on August 27, 2018 in COMMERCE CITY, CO 80022. This does not indicate receipt by the USPS or the actual mailing date.
19	08/27/2018		Your item arrived at the HOUSTON, TX 77210 post office at 11:44 am on August 31, 2018 and is ready for pickup.
20	08/27/2018		Your package will arrive later than expected, but is still on its way. It is currently in transit to the next facility.
21	08/27/2018		A shipping label has been prepared for your item at 4:37 pm on August 27, 2018 in COMMERCE CITY, CO 80022. This does not indicate receipt by the USPS or the actual mailing date.
22	08/21/2018		Your shipment was received at 5:48 pm on August 21, 2018 in DENVER, CO 80217. The acceptance of your package is pending.
23	08/27/2018		Your package will arrive later than expected, but is still on its way. It is currently in transit to the next facility.
24	08/27/2018		A shipping label has been prepared for your item at 4:37 pm on August 27, 2018 in COMMERCE CITY, CO 80022. This does not indicate receipt by the USPS or the actual mailing date.
25	08/21/2018		Your package will arrive later than expected, but is still on its way. It is currently in transit to the next facility.
26	08/27/2018		This is a reminder to arrange for redelivery of your item or your item will be returned to sender.
27	08/27/2018		A shipping label has been prepared for your item at 4:38 pm on August 27, 2018 in COMMERCE CITY, CO 80022. This does not indicate receipt by the USPS or the actual mailing date.
28	08/21/2018		Your item arrived at the CARLSBAD, NM 88220 post office at 5:49 am on August 30, 2018 and is ready for pickup.
29	08/27/2018		Your package will arrive later than expected, but is still on its way. It is currently in transit to the next facility.
30	08/27/2018		A shipping label has been prepared for your item at 4:38 pm on August 27, 2018 in COMMERCE CITY, CO 80022. This does not indicate receipt by the USPS or the actual mailing date.
31	08/21/2018		Your package is moving within the USPS network and is on track to be delivered to its final destination. It is currently in transit to the next facility.
32	08/27/2018		Your item departed our ALBUQUERQUE, NM 87101 destination facility on September 3, 2018 at 9:22 pm. The item is currently in transit to the destination.
33	08/27/2018		A shipping label has been prepared for your item at 4:38 pm on August 27, 2018 in COMMERCE CITY, CO 80022. This does not indicate receipt by the USPS or the actual mailing date.
34	08/21/2018		Your item is being held at the SANTA FE, NM 87505 post office at 11:49 am on August 28, 2018. The item was removed from a full parcel locker.
35	08/27/2018		Your package will arrive later than expected, but is still on its way. It is currently in transit to the next facility.
36	08/27/2018		A shipping label has been prepared for your item at 4:37 pm on August 27, 2018 in COMMERCE CITY, CO 80022. This does not indicate receipt by the USPS or the actual mailing date.
37	08/21/2018		Your package is moving within the USPS network and is on track to be delivered to its final destination. It is currently in transit to the next facility.
38	08/27/2018		We attempted to deliver your package at 12:09 pm on August 30, 2018 in MIDLAND, TX 79707 but could not access the delivery location. We will redeliver on the next business day.
39	08/27/2018		A shipping label has been prepared for your item at 4:38 pm on August 27, 2018 in COMMERCE CITY, CO 80022. This does not indicate receipt by the USPS or the actual mailing date.
40	08/21/2018	08/29/2018	Your item was delivered to an individual at the address at 11:43 am on August 28, 2018 in MIDLAND, TX 79707.
41	08/27/2018	09/03/2018	Your item was delivered to an individual at the address at 11:48 am on August 29, 2018 in LONGMONT, CO 80501.
42	08/27/2018		A shipping label has been prepared for your item at 4:38 pm on August 27, 2018 in COMMERCE CITY, CO 80022. This does not indicate receipt by the USPS or the actual mailing date.
43	08/21/2018	08/30/2018	Your item was delivered to an individual at the address at 12:57 pm on August 28, 2018 in LONGMONT, CO 80501.
44	08/27/2018	09/03/2018	Your item was delivered at 12:30 pm on August 30, 2018 in ARTESIA, NM 88210.
45	08/27/2018		A shipping label has been prepared for your item at 4:37 pm on August 27, 2018 in COMMERCE CITY, CO 80022. This does not indicate receipt by the USPS or the actual mailing date.
46	08/21/2018	09/03/2018	Your item was delivered at 12:30 pm on August 30, 2018 in ARTESIA, NM 88210.
47	08/27/2018		Your item departed our USPS facility in NORTH HOUSTON TX DISTRIBUTION CENTER on September 3, 2018 at 1:19 am. The item is currently in transit to the destination.
48	08/27/2018		A shipping label has been prepared for your item at 4:37 pm on August 27, 2018 in COMMERCE CITY, CO 80022. This does not indicate receipt by the USPS or the actual mailing date.

	A	B	F	G	I	J	K
49	Certified with Return Receipt (Signature)	9414810898765016858819	Chisos, Ltd	670 Dona Ana Rd SW	Deming	NM	88030
50	Certified with Return Receipt (Signature)	9414810898765017249678	COG Operating LLC	600 W Illinois Ave	Midland	TX	79701
51	Certified with Return Receipt (Signature)	9414810898765017249289	COG Operating LLC	600 W Illinois Ave	Midland	TX	79701
52	Certified with Return Receipt (Signature)	9414810898765016858833	COG Operating LLC	600 W Illinois Ave	Midland	TX	79701
53	Certified with Return Receipt (Signature)	9414810898765017249685	Concho Oil & Gas LLC	600 W Illinois Ave	Midland	TX	79701
54	Certified with Return Receipt (Signature)	9414810898765017249296	Concho Oil & Gas LLC	600 W Illinois Ave	Midland	TX	79701
55	Certified with Return Receipt (Signature)	9414810898765016858840	Concho Oil & Gas LLC	600 W Illinois Ave	Midland	TX	79701
56	Certified with Return Receipt (Signature)	9414810898765017249692	Tom R. Cone	1304 W Broadway Place	Hobbs	NM	88240
57	Certified with Return Receipt (Signature)	9414810898765017249302	Tom R. Cone	1304 W Broadway Place	Hobbs	NM	88240
58	Certified with Return Receipt (Signature)	9414810898765016858864	Tom R. Cone	1304 W Broadway Place	Hobbs	NM	88240
59	Certified with Return Receipt (Signature)	9414810898765017249708	ConocoPhillips Company	PO Box 7500	Bartlesvill	OK	74005
60	Certified with Return Receipt (Signature)	9414810898765017249319	ConocoPhillips Company	PO Box 7500	Bartlesvill	OK	74005
61	Certified with Return Receipt (Signature)	9414810898765016858871	ConocoPhillips Company	PO Box 7500	Bartlesvill	OK	74005
62	Certified with Return Receipt (Signature)	9414810898765017249715	Cross Borders Resources, Inc	2515 McKinney Ave Suite 900	Dallas	TX	75201
63	Certified with Return Receipt (Signature)	9414810898765017249326	Cross Borders Resources, Inc	2515 McKinney Ave Suite 900	Dallas	TX	75201
64	Certified with Return Receipt (Signature)	9414810898765016858888	Cross Borders Resources, Inc	2515 McKinney Ave Suite 900	Dallas	TX	75201

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49	08/21/2018		Your package is moving within the USPS network and is on track to be delivered to its final destination. It is currently in transit to the next facility.
50	08/27/2018	09/03/2018	Your item was delivered to an individual at the address at 2:42 pm on August 30, 2018 in MIDLAND, TX 79701.
51	08/27/2018		A shipping label has been prepared for your item at 4:37 pm on August 27, 2018 in COMMERCE CITY, CO 80022. This does not indicate receipt by the USPS or the actual mailing date.
52	08/21/2018	09/03/2018	Your item was delivered to an individual at the address at 2:42 pm on August 30, 2018 in MIDLAND, TX 79701.
53	08/27/2018	09/03/2018	Your item was delivered to an individual at the address at 2:42 pm on August 30, 2018 in MIDLAND, TX 79701.
54	08/27/2018		A shipping label has been prepared for your item at 4:37 pm on August 27, 2018 in COMMERCE CITY, CO 80022. This does not indicate receipt by the USPS or the actual mailing date.
55	08/21/2018	08/28/2018	Your item was delivered to an individual at the address at 3:06 pm on August 27, 2018 in MIDLAND, TX 79701.
56	08/27/2018	09/03/2018	Your item was delivered to an individual at the address at 12:33 pm on August 30, 2018 in HOBBS, NM 88240.
57	08/27/2018		A shipping label has been prepared for your item at 4:37 pm on August 27, 2018 in COMMERCE CITY, CO 80022. This does not indicate receipt by the USPS or the actual mailing date.
58	08/21/2018	09/04/2018	Your item was delivered to an individual at the address at 12:33 pm on August 30, 2018 in HOBBS, NM 88240.
59	08/27/2018	09/03/2018	Your item was delivered at 7:17 am on August 30, 2018 in BARTLESVILLE, OK 74003.
60	08/27/2018		A shipping label has been prepared for your item at 4:37 pm on August 27, 2018 in COMMERCE CITY, CO 80022. This does not indicate receipt by the USPS or the actual mailing date.
61	08/21/2018	09/03/2018	Your item was delivered at 7:17 am on August 30, 2018 in BARTLESVILLE, OK 74003.
62	08/27/2018		Your item arrived at the Post Office at 8:10 am on September 1, 2018 in DALLAS, TX 75201.
63	08/27/2018		A shipping label has been prepared for your item at 4:37 pm on August 27, 2018 in COMMERCE CITY, CO 80022. This does not indicate receipt by the USPS or the actual mailing date.
64	08/21/2018		USPS was unable to deliver your item as of 11:49 am on August 31, 2018 in DALLAS, TX 75201. The address may be incorrect, incomplete, or illegible.