

UIC - I - ____8-1____

**EPA FALL-OFF
TEST**

DATE:

2016

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Thursday, July 27, 2017 11:38 AM
To: 'Dade, Lewis (Randy)'; Denton, Scott; Combs, Robert; Holder, Mike; Romine, William (Bill); Newton, Kevin; Acosta, Jesus
Cc: Sanchez, Daniel J., EMNRD; Griswold, Jim, EMNRD; Podany, Raymond, EMNRD
Subject: RE: Fall Off Testing and Shutting in all Wells

Randy, et al.:

The New Mexico Oil Conservation Division (OCD) is in receipt of HollyFrontier Navajo Refining, LLC's (Navajo) request to stop shutting-in and monitoring its entire inventory of disposal wells seated in the same formation during each individual well Fall-Off Test (FOT) and to focus on each well FOT individually or independently from the others from now on.

Navajo had monitored the other wells to determine interconnection between its wells and the injection zone(s) in order to pursue a reduced and staggered well FOT schedule with OCD. However, EPA recently communicated with OCD on the Federal requirements that each Underground Injection Control (UIC) Class I (Non-hazardous) Injection Well shall undergo an annual FOT. While a FOT is not considered to be a MIT, it allows for the monitoring of the capacity of the injection zone to receive effluent for disposal, and other vital formation characteristics over time.

OCD hereby **approves** Navajo's request.

Please contact me if you have questions. Thank you.

Mr. Carl J. Chavez, CHMM (#13099)
New Mexico Oil Conservation Division
Energy Minerals and Natural Resources Department
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Santa Fe, New Mexico 87505
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“Why not prevent pollution, minimize waste to reduce operating costs, reuse or recycle, and move forward with the rest of the Nation?” (To see how, go to: <http://www.emnrd.state.nm.us/OCD> and see “Publications”)

From: Dade, Lewis (Randy) [mailto:Lewis.Dade@HollyFrontier.com]
Sent: Thursday, July 27, 2017 11:17 AM
To: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>; Denton, Scott <Scott.Denton@HollyFrontier.com>; Combs, Robert <Robert.Combs@HollyFrontier.com>; Holder, Mike <Michael.Holder@hollyfrontier.com>; Romine, William (Bill) <William.Romine@HollyFrontier.com>; Newton, Kevin <Kevin.Newton@HollyFrontier.com>; Acosta, Jesus <Jesus.Acosta@HollyFrontier.com>
Cc: Dade, Lewis (Randy) <Lewis.Dade@HollyFrontier.com>
Subject: Fall Off Testing and Shutting in all Wells

Carl,

Regarding FOT on the HollyFrontier Injection System, HollyFrontier has been shutting in the whole injection system for 30 -36 hours. This practice was started to determine if there was interconnectivity between the wells and

formations. HollyFrontier has conducted Fall Off Tests on each well individually while the two wells not being tested are shut in. HollyFrontier asks that OCD approve FOT's that require only shutting in the well on which the FOT is occurring on. WDW-1 (30-015-27592), WDW-2 (30-015-20894), and WDW-3 (30-015-26575) are tested yearly following the UIC Guidelines set by EPA Region 6 and OCD. Your help in this matter is greatly appreciated. Thanks for the help.

Thanks again, Randy



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Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Thursday, May 12, 2016 11:24 AM
To: Denton, Scott (Scott.Denton@HollyFrontier.com); pthompson@merrion.bz
Cc: Griswold, Jim, EMNRD; Kuehling, Monica, EMNRD; Smith, Cory, EMNRD; Inge, Richard, EMNRD
Subject: New Mexico UIC Class I (non-hazardous) Well MIT & Annual Fall-Off Test Scheduling with Completion by September 30, 2016 (San Juan and Eddy Counties)

Scott and Philana:

Re: Annual Fall-Off Test for Agua Moss, LLC (San Juan County): UICI-005 (API# 30-045-28653); and HollyFrontier Navajo Refining Company (Eddy County): UICI-008-1 (WDW-1) API# 30-015-27592; UICI-008-2 (WDW-2) API# 30-015-20894 & UICI-008-3 (WDW-3) API# 30-015-26575

Good morning. It is that time of year again to remind operators about their annual Underground Injection Control (UIC) Program Fall-Off Tests (FOT) and Mechanical Integrity Tests (MIT) for this season to be completed on or before Friday, September 30, 2016. A C-103 Form with details about your well plans must be submitted to the District Office with a copy to me in Santa Fe.

The list of operator names w/ associated UIC Class I (non-hazardous) Wells affected by this notification are provided above. Operators are aware of the MIT (30 min @ => 300 psig) and Bradenhead Test requirements.

The FOT spans several days with a couple of important notes to operators from past testing, please install your bottom hole gauge(s) with recorder(s) at least 48-hours in advance of the pump shut-off during the pseudo steady-state injection period. OCD recommends that operators clean out the wellbore to eliminate erroneous well bore related FOT results. The OCD District Office would appreciate notifications for the dates and times of the bottom hole gauge installation, and pump shut-off to observe the short term fall-off in pressure in order to make arrangements to witness these actions.

Also, you are accountable for your OCD approved FOT Test Plan and the requirements in the UIC Test Guidance with Reporting Requirements at <http://www.emnrd.state.nm.us/oed/documents/UICGuidance.pdf>. For access to your FOT Plan, please enter your permit information on "OCD Online" at <http://ocdimage.emnrd.state.nm.us/imaging/AEOrderCriteria.aspx> and enter the Order Type "UICI" along with your Order number.

For information on New Mexico's UIC Program and training information, please go to: <http://www.emnrd.state.nm.us/OCD/publications.html>.

Please contact me at (505) 476-3490 on or before May 31, 2016 to schedule your MIT and FOT date and time or if you have questions.

Thank you in advance for your cooperation.

Copy: UIC Class I (non-hazardous) Well Files UICI- 5; and UICI 8-1, 8-2 & 8-3

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Why not prevent pollution, minimize waste, reduce operation costs, and move forward with the rest of the Nation? To see how, go to “Publications” and “Pollution Prevention” on the OCD Website.