

BW-28

**COMPLIANCE
REVIEW**

2022

From: [Chavez, Carl J, EMNRD](#)
To: [Jill Best](#); [Teresa Boone](#)
Cc: [Goetze, Phillip, EMNRD](#); [Powell, Brandon, EMNRD](#)
Subject: Compliance Review BW-28
Date: Wednesday, March 23, 2022 1:53:00 PM
Attachments: [BW-28 DP Renewal.pdf](#)

Ms. Best and Ms. Boone:

Re.: Discharge Permit Deliverables

Permit	Facility Name	Expiration	Facility ID#	OGRID#	Active	Operator	Well Name	API#	MIT Date
BW-28	BW-28 State Brine Well #1	12/26/2024	fCJC2134938257	19797	A	Key Energy Services, LLC	State Brine Well #1	30-025-33547	2/2/17

Good afternoon!

The New Mexico Oil Conservation Division (OCD) has completed a review of the administrative record for the above subject brine well facility. The attached OCD Discharge Permit was issued to Mr. Maury Sticker formerly from Key Energy Services, LLC. (Key). Consequently, OCD is directing this message to Key staff for further communication(s) on this message.

Currently, OCD is awaiting the completion of the Casing MIT currently scheduled with OCD for 4/15/2022. OCD will need to receive a good quality image of the completed Casing MIT Chart with Chart Recorder Calibration Sheet with Spring Weight parameters, etc. There is also a transfer of permit request pending OCD Director approval.

Based on a compliance review of the administrative record, OCD hereby requires the following deliverables to be submitted via E-Permitting within 90-days from today's date or by COB on June 23, 2022 except as indicated below.

- Condition 2.A (Semi-Annual Monitoring Requirements): No semi-annual monitoring results received from 2021 to present.
- Conditions 2.A.1 & 2.H.3 (Groundwater Monitoring Well): Monitor well not installed at end of OCD approved Covid-19 extension period or as of October 31, 2020.
- Condition 2.B.1 & 2.J (Surface Subsidence Monitor Plan & Semi-annual Survey Results): Surveys not submitted since January 2019 and not submitting semi-annually. Covid-19 pandemic extension date to October 2020 was approved to begin surveying again.
- Condition 2.B.2 & 2.J (Solution Cavern Characterization Program): Plan not developed nor submitted. Covid-19 pandemic extension request to delay submission of a cavern characterization plan until April 15, 2021 rather than June of 2020 as required under permit condition 5.D, OCD could not agree until it reviews the 2019 annual report. The **annual report was not received** (see Condition 2.J below).
- Condition 2.B.3 (Annual Certification): Not submitted since 2018.
- Condition 2.H.3 (Environmental Monitoring): Same as Condition 2.A.1 above.
- Condition 2.J (Annual Report): Not submitted since 2018. Covid-19 pandemic extension request for the 2019 annual report was denied.
- Condition 3.F.(Fluids Injection & Brine Production Pressures/Vols.): Not submitted in 2019 -2020. Submittal for 2021 was received but lacking cumulative volumes/injection pressures. Nothing submitted in 2022. Complete brine production with cumulative volumes from start of production to date is required and for solution cavern characterization and maturity assessments.
- Section 3.G. (Area of Review): No updated reviews assessed since 2018.

As per Permit Condition 1.I (Compliance and Enforcement), any required items that are not received by June 23, 2022 become subject to this provision of the brine well permit.

OCD Management has been copied on this e-mail message and may chime-in as needed.

Please contact me if you have questions.

Thank you.

Carl J. Chavez • UIC Group
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