

BW-37

**COMPLIANCE
REVIEW**

2022

From: [Chavez, Carl J, EMNRD](#)
To: [Darr Angell; Laura Angell](#)
Cc: [Goetze, Phillip, EMNRD; Powell, Brandon, EMNRD](#)
Subject: Compliance Review BW-37
Date: Thursday, March 24, 2022 11:42:00 AM
Attachments: [RW-37 DP.rnc.pdf](#)

Mr. Angell:

Re: Discharge Permit Deliverables

Permit	Facility Name	Expiration	Facility ID#	OGRID#	Active	Operator	Well Name	API#	MIT Date
BW-37	BW-37 State '4' BSW #1	5/4/2023	fCJC2134960146	370661	A	Llano Disposal, LLC	State '4' BSW #1	30-025-26370	1/10/19

Good morning!

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 Llano Disposal, LLC (Llano Disposal LLC). Consequently, OCD is directing this message to you for further communication(s) on this message.

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 24, 2022 except as indicated below.

- Condition 2.A (Semi-Annual Monitoring Requirements): No groundwater monitor well nor brine quality data results submitted to date.
- Conditions 2.A.1 & 2.H.3 (Groundwater Monitoring Well): Monitor well not installed.
- Condition 2.B.1 (Surface Subsidence Monitor Plan): No semi-annual survey elevations have been submitted since 2019.
- Condition 2.B.2 (Solution Cavern Characterization Program): No annual cavern characterization assessments have been received to date.
- Condition 2.B.3 (Annual Certification): No certifications submitted to date.
- Condition 2.J & 5.B.1 (Annual Report): No reports submitted to date. The 2019 and 2020 annual reports require submittal.
- Condition 3.F.(Fluids Injection & Brine Production Vols. & Pressures): Partially submitted in 2020 and lacking in 2021 without cumulative volumes. Complete monthly brine production with injection pressures and cumulative volumes from start of production to date to present is required for solution cavern characterization and maturity assessments.
- Condition 3.G (Area of Review): No updates have been submitted since 2018.
- Condition 5.A.2 & 2.H.3.a (Groundwater Monitoring Well): No monitoring well has been installed to date. No semi-annual water nor brine quality data results submitted to date.
- Condition 5.B.3 (Injection Volumes): No monthly injection and production volumes have been submitted for 2018.

As per Permit Condition 1.I (Compliance and Enforcement), any required items that are not received by June 24, 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
Engineering Bureau
EMNRD - Oil Conservation Division
5200 Oakland Avenue, N.E. Suite 100 | Albuquerque, NM 87113
505.660.7923
www.emnrd.nm.gov

