

BW-38

**COMPLIANCE
REVIEW**

2022

From: [Chavez, Carl J. EMNRD](#)
To: [Darr Angell](#); [Laura Angell](#)
Cc: [Goetze, Phillip, EMNRD](#); [Powell, Brandon, EMNRD](#)
Subject: Compliance Review BW-38
Date: Thursday, March 24, 2022 1:22:00 PM
Attachments: [BW-38 DP.pdf](#)

Mr. Angell:

Re: Discharge Permit Deliverables

Permit	Facility Name	Expiration	Facility ID#	OGRID#	Active	Operator	Well Name	API#	MIT Date
BW-38	BW-38 State '27" Well #1	11/7/2023	fCJC2135034752	370661	A	Llano Disposal, LLC	State '27" Well #1	30-025-20592	11/7/19

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.A (Semi-Annual Monitoring Requirements): No groundwater monitor well data results submitted during the permit period..
- Conditions 2.A.1, 2.H.3 & 5.A.4 (Groundwater Monitoring Well): Monitor well not installed during the permit period.
- Condition 2.B.1 & 5.A.2 (Surface Subsidence Monitor Plan & Semi-Annual Survey Results): Plan submitted but survey data results not submitted during permit period.
- Condition 2.B.2 & 5.A.3 (Solution Cavern Characterization Program): Plan submitted but annual characterization assessments not submitted during permit period.
- Condition 2.B.3 (Annual Certification): 2019 – 2021 certifications not submitted during permit period.
- Condition 2.J & 5.B.1 (Annual Report): 2019 – 2021 reports not submitted during permit period.
- Condition 3.F.(Fluids Injection & Brine Production Pressures/Vols.): Submitted in 2020 and 2021. Information for 2019 is required. Complete brine production with cumulative volumes from start of production to date is required and for solution cavern characterization and maturity calculations. oh
- Condition 3.G (Area of Review): No AOR updates submitted during permit period.
- Condition 5.B.3 (Injection Volumes): No monthly injection nor production volumes were submitted during permit period.

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
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