Chavez, Carl J, EMNRD

From:	Chavez, Carl J, EMNRD
Sent:	Friday, September 28, 2018 2:30 PM
То:	Robinson, Kelly
Cc:	Griswold, Jim, EMNRD; Jones, William V, EMNRD; Powell, Brandon, EMNRD; Kuehling, Monica, EMNRD
Subject:	RE: WDW-2 (UICI-011) - Fall-Off Test Extension Request (API# 30-045-28653

Kelly:

Re: Fall-Off Test Extension Request for On or Before April 30, 2019

Approved.

Please be aware of the 1 year non-injection period under <u>19.15.26 NMAC</u> (see applicable regulation below). OCD UIC Class I (Non-hazardous) Disposal Wells must meet all of the requirements of Class II Disposal Wells.

19.15.26.12 COMMENCEMENT, DISCONTINUANCE AND ABANDONMENT OF INJECTION OPERATIONS:

A. The following provisions apply to injection projects, storage projects, salt water disposal wells and special purpose injection wells.

B. Notice of commencement and discontinuance.

(1) Immediately upon the commencement of injection operations in a well, the operator shall notify the division of the date the operations began.

(2) Within 30 days after permanent cessation of gas or liquefied petroleum gas storage operations or within 30 days after discontinuance of injection operations into any other well, the operator shall notify the division of the date of the discontinuance and the reasons for the discontinuance.

(3) Before temporarily abandoning or plugging an injection well, the operator shall obtain approval from the appropriate division district office in the same manner as when temporarily abandoning or plugging oil and gas wells or dry holes. *C. Abandonment of injection operations.*

(1) Whenever there is a continuous one year period of non-injection into all wells in an injection or storage project or into a salt water disposal well or special purpose injection well, the division shall consider the project or well abandoned, and the authority for injection shall automatically terminate ipso facto.

(2) For good cause shown, the director may grant an administrative extension or extensions of injection authority as an exception to Paragraph (1) of Subsection C of 19.15.26.12 NMAC, provided that any such extension may be granted only prior to the end of one year or continuous non-injection, or during the term of a previously granted extension. [19.15.26.12 NMAC, 12/1/08]

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 1220 South St Francis Drive Santa Fe, New Mexico 87505 Ph. (505) 476-3490 E-mail: CarlJ.Chavez@state.nm.us

"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: <u>http://www.emnrd.state.nm.us/OCD</u> and see "Publications")

From: Robinson, Kelly <Kelly.Robinson@andeavor.com>
Sent: Friday, September 28, 2018 12:04 PM
To: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>
Subject: [EXT] WDW-2 (UICI-011) - Fall-Off Test Extension Request

Good Morning Sir!

Thank you so much for taking the time to talk with me earlier today. As we discussed earlier, Western Refining Southwest, Inc. – Bloomfield Terminal ("Western") is requesting the New Mexico Oil Conservation Division's approval to extend the deadline to conduct the 2018 Fall-Off Test on the facility Waste Disposal Well No. 2 (UICI-011). The annual test is required pursuant to WDW-2 Permit Condition 3.E.

Due to the lack of precipitation and lower volume of wastewater effluent produced by the Bloomfield Terminal operations in 2018, the Terminal has not operated the injection well for a continuous period of over 24-hours since May 2018. As of August 2018, the facility's wastewater treatment system is producing on average approximately 15 gallon per minute of treated wastewaters. These waters are pumped to the on-site evaporation ponds prior to being injected into the on-site Class I Injection Well. Due to lack of precipitation in the Four Corners Area and the higher consistent summer temperatures, the rate of evaporation at the evaporation ponds has exceeded the rate of wastewater production. As such, currently we have evaporated all the waters previously stored in the north evaporation pond, and we currently are storing approximately less than 6-inches of water in the south evaporation pond. The level in the evaporation pond continues to lower due to the continued higher temperatures resulting in continued higher natural evaporation rates.

At this time, Western has <u>no interest</u> to pursue closure and/or abandonment of the well. The request for extending the Fall-Off Testing is to allow for sufficient waters to collect in the evaporation pond during the cooler months of the year so that the well can be operated continuously for a period of time before the Fall-Off pressures are recorded for testing. At this time, Western is requesting permission to conduct the test prior to April 2019. The respective Sundry notifications will be submitted to NMOCD for approval prior to testing so as to provide NMOCD the opportunity to witness the testing activities.

I very much appreciate your time and consideration of this request. If you have any questions or would like additional information for justification, please do not hesitate to contact me at your convenience.

Sincerely,

Kelly R. Robinson - Environmental Supervisor

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Please note: My email address changed to Kelly.Robinson@andeavor.com on July 31, 2017. Please update your records.