Protested SWD Application

By Apache; received 9/7/2023

From:	Gebremichael, Million, EMNRD
То:	Nate Alleman
Cc:	Goetze, Phillip, EMNRD; Harris, Anthony, EMNRD; Tremaine, Jesse, EMNRD; Gaines, Dean
Subject:	Notification of Protest for application to Inject : O"Brien SWD State #1, Jameis SWD State #1,Cannon SWD State #1,Juice SWD State #1,Toretta SWD State #1,Burrrow State SWD #1
Date:	Wednesday, September 27, 2023 9:44:00 AM
Attachments:	image001.png

Mr. Alleman,

The OCD was notified by Apache Corporation that it is protesting the following administrative applications of Pilot Water Solutions SWD LLC (Pilot Water Solutions) for produced water disposal in Lea County, NM:

- 1. O'Brien SWD State #1 , Located in 384' FSL & 407' FWL in Section 5 T19S R37E
- 2. Jameis SWD State #1, Located in 1,429' FSL & 458' FEL in Section 7 T19S R37E
- 3. Cannon SWD State #1, Located in 2,363' FNL & 1,271' FEL in Section 9 T19S R37E
- 4. Juice SWD State #1, Located in 497' FNL & 771' FWL in Section 7 T19S R37E
- 5. Toretta SWD State #1, Located 545' FNL & 2,510' FEL in Section 17 T19S R37E
- 6. Burrrow State SWD #1, Located in 458' FNL & 1,612' FWL in Section 5 T19S R37E

Apache is identified as an affected person for the referenced applications. For these applications to proceed, Pilot Water Solutions has two options; either resolve the matter with the protesting party or to go to a hearing before the Division. If the protest is withdrawn, then the applications could be processed administratively. Meanwhile, OCD will retain your applications until a resolution is reached on the status of the submittals. If you have any questions, please don't hesitate to reach out to UIC group.

Thanks,

Million Gebremichael

Petroleum Specialist- A Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505 Cell: 505-4791137





September 7, 2023

Energy, Minerals & Natural Resources Department Oil Conservation Division Attention: Phillip Goetze, P.G. 1220 South St. Francis Drive Santa Fe, New Mexico 87505

Re: C108-Application for Authorization to Inject:

Pilot Water Solutions SWD LLC O'Brien SWD State #1 384' FSL & 407' FWL in Section 5 T19S R37E

Pilot Water Solutions SWD LLC Jameis SWD State #1 1,429' FSL & 458' FEL in Section 7 T19S R37E Pilot Water Solutions SWD LLC Cannon SWD State #1 2,363' FNL & 1,271' FEL in Section 9 T19S R37E

All applications are in Lea County New Mexico.

Pilot Water Solutions SWD LLC Juice SWD State #1 497' FNL & 771' FWL in Section 7 T19S R37E

Pilot Water Solutions SWD LLC Toretta SWD State #1 545' FNL & 2,510' FEL in Section 17 T19S R37E

Pilot Water Solutions SWD LLC Burrrow State SWD #1 458' FNL & 1,612' FWL in Section 5 T19S R37E

Engineering Unit,

Apache Corporation hereby gives notice of its intent to protest the referenced 6 applications. Should a formal hearing be called Apache Corporation will appear and present any relevant evidence and testimony in support of our position. By copy of this letter the applicant is being notified of our intent.

Thank you for your assistance, and if you need additional information, please contact me via email at: <u>dean.gaines@apachecorp.com</u> or direct at: (432) 818-1803.

Sincerely,

Dean Gaines EH&S Sr. Advisor-Regulatory

CC: nate.alleman@aceadvisors.com



August 30, 2023

Subject: Pilot Water Solutions SWD LLC Notice of Application for Authorization to Inject O'Brien SWD State #1

Dear Sir or Madam,

Pilot Water Solutions SWD LLC (Pilot) is applying for administrative approval of an Application for Authorization to Inject (Form C-108) for their proposed O'Brien SWD State #1. Per New Mexico Oil Conservation Division (NMOCD) requirements, you are being notified of the application as an Affected Person and are being provided with a copy of the application for review.

Applicant Name:	Pilot Water Solutions SWD LLC
Operator Address:	20 Greenway Plaza, Suite 200, Houston, TX 77046
Well Name:	O'Brien SWD State #1
Location:	384' FSL & 407' FWL in Section 5 T19S R37E in Lea County, NM
Injection Formation:	San Andres
Injection Type:	Commercial Disposal

Objections or requests for hearing must be filed with NMOCD within fifteen (15) days of receipt. Any objection or request for hearing should be mailed to the Oil Conservation Division, 1220 South St. Francis Dr., Santa Fe, New Mexico 87505.

Questions regarding this application or the included materials can be directed to Nate Alleman (Pilot Regulatory Advisor Contractor) via telephone at 918-237-0559 or via email at nate.alleman@aceadvisors.com.

Sincerely,

tran Alleman

Nate Alleman Chief Regulatory Advisor Ace Energy Advisors

2023 SEP -5 AM 9: 03

Well Data

Operator - Pilot Water Solutions SWD LLC Lease/Well Name & Number - O'Brien SWD State #1 Legal Location - 384' FSL & 407' FWL - Unit M - Section 5 T19S R37E - Lea County

Casing Data

Casing String	Hole Size (in)	Casing Size	Casing Depth (ft)	Sacks Cement (sx)	Top of Cement (ft)	Method Determined
	17-1/2	13-3/8	1.458	2.285.3	0	Circulation
Surface		9-5/8	5,555	1.658.2	0	Circulation
Production	12-1/4	9-0/0	0,000			

Tubing: 5-1/2" fiberglass-coated tubing set at 4,312' Packer: Weatherford AS1X Stainless 9-5/8" X 5-1/2" set at 4,312'

Geology Data

Injection Formation Name - San Andres	2023
Pool Name - SWD; San Andres	
Pool Code – 96121	SEP
Injection Interval - Cased-hole injection between 4,312' – 5,555'	l n
Drilling Purpose - New drill for injection	
Other Perforated Intervals: No other perforated intervals exist.	ې
Overlying Oil and Gas Zones:	Ö
Victor (2.707')	6

- Yates (2,707')
 7 Rivers (2,969')
- Queen (3,495')
- Gravburg (3,774')

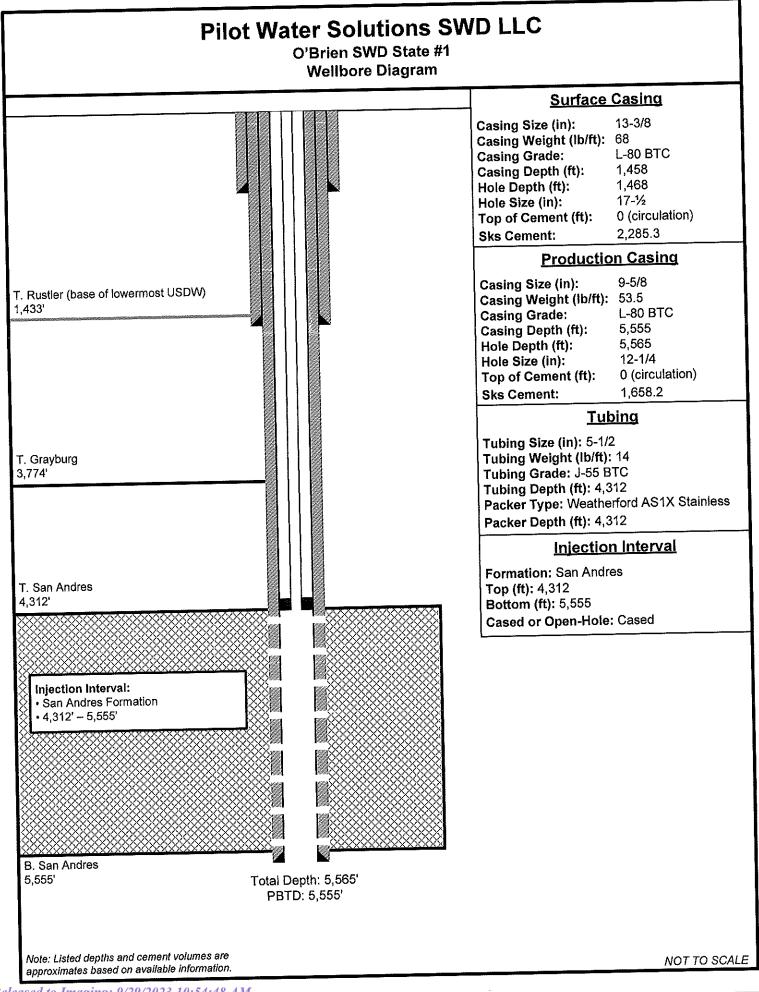
Underlying Oil and Gas Zones – None

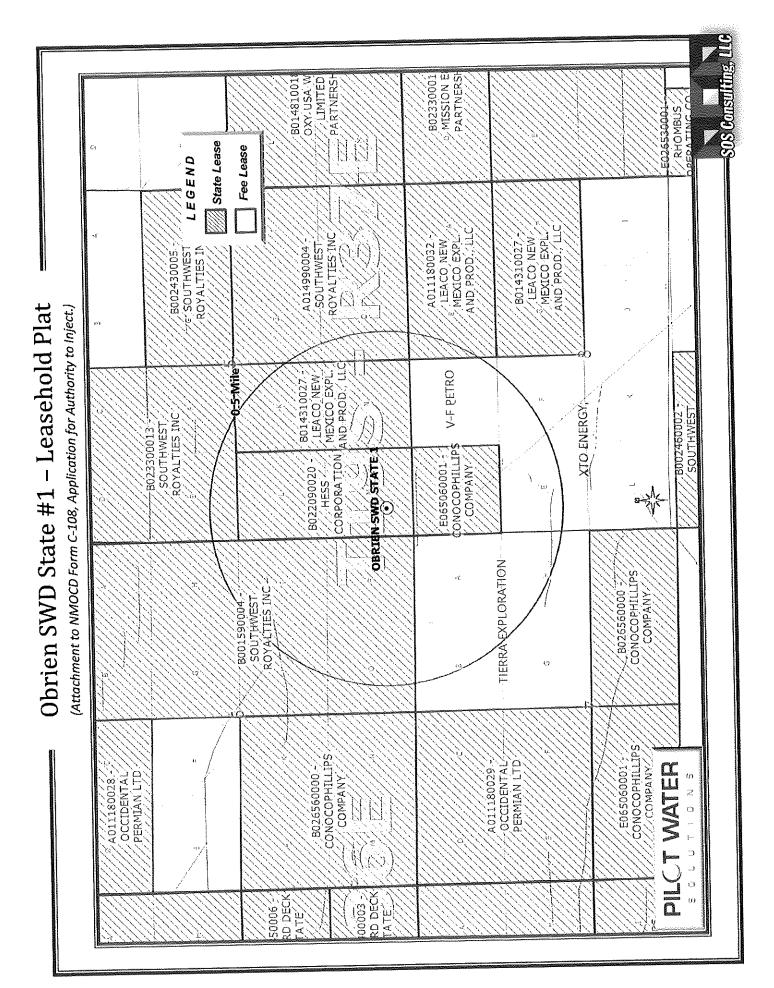
Geologic Description of Injection Interval - The proposed injection interval is located in the San Andres formation between the depths of 4,312 and 5,555 feet. The San Andres formation consists of an interbedded carbonate sequence composed of limestone and dolomite. These cycles tend to be mappable within the San Andres and are differentiated by sections of either very high or very low porosity and permeability development. Upper and lower confinement will be provided by tight carbonate facies present within San Andres that occur above and below the porous injection interval. The upper confining interval occurs at the top of the San Andres formation, directly underlying the Grayburg formation, and ranges from 125' – 150' net thickness based on a review of nearby open-hole geophysical logs. The lower confining interval occurs at the bottom of the San Andres formation, directly overlying the Glorieta formation, and ranges from 150' - 200' net thickness based on a review of nearby open-hole geophysical logs.

The base of the lowermost Underground Source of Drinking Water (USDW), identified as the top of the first anhydrite, was determined to occur at the top of the Rustler formation at a depth of 1,433'. Water wells in the area are drilled to a depth of approximately 100' – 200'.

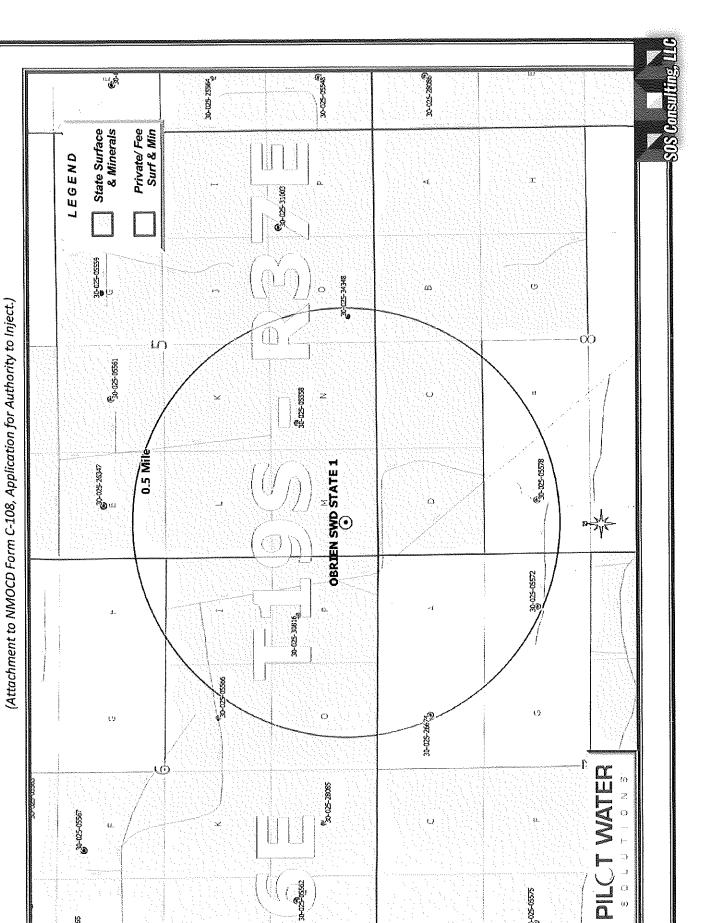
Operational Data

Proposed Maximum Injection Rate: 25,000 BWPD Proposed Average Injection Rate: 15,000 BWPD Proposed Maximum Injection Pressure: 862 psi (surface) Proposed Average Injection Pressure: 500-600 psi (surface)





Obrien SWD State #1 – Surface & Minerals Ownership



30-025-05575

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September 1, 2023

Subject: Pilot Water Solutions SWD LLC Notice of Application for Authorization to Inject Juice SWD State #1

Dear Sir or Madam,

Pilot Water Solutions SWD LLC (Pilot) is applying for administrative approval of an Application for Authorization to Inject (Form C-108) for their proposed Juice SWD State #1. Per New Mexico Oil Conservation Division (NMOCD) requirements, you are being notified of the application as an Affected Person and are being provided with a copy of the application for review.

Applicant Name:	Pilot Water Solutions SWD LLC
Operator Address:	20 Greenway Plaza, Suite 200, Houston, TX 77046
Well Name:	Juice SWD State #1
Legal Location:	497' FNL & 771' FWL in Section 7 T19S R37E, in Lea County, NM
Injection Formation:	San Andres
Injection Type:	Commercial Disposal

Objections or requests for hearing must be filed with NMOCD within fifteen (15) days of receipt. Any objection or request for hearing should be mailed to the Oil Conservation Division, 1220 South St. Francis Dr., Santa Fe, New Mexico 87505.

Questions regarding this application or the included materials can be directed to Nate Alleman (Pilot Regulatory Advisor Contractor) via telephone at 918-237-0559 or via email at nate.alleman@aceadvisors.com.

Sincerely,

Nate Alleman Chief Regulatory Advisor Ace Energy Advisors

2023 SEP -5 AM 9: 02

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Well Data

Operator - Pilot Water Solutions SWD LLC Lease/Well Name & Number - Juice SWD State #1 Legal Location - 497' FNL & 771' FWL - Unit D – Section 7 T19S R37E – Lea County

Casing Data

Casing String	Hole Size (in)	Casing Size (in)	Casing Depth (ft)	Sacks Cement (sx)	Top of Cement (ft)	Method Determined
Surface	17-1/2	13-3/8	1,448	2,269.6	0	Circulation
Production	12-1/4	9-5/8	5,510	1,644.7	0	Circulation

Tubing: 5-1/2" fiberglass-coated tubing set at 4,408' Packer: Weatherford AS1X Stainless 9-5/8" X 5-1/2" set 4,408'

Geology Data

Injection Formation Name - San Andres

Pool Name - SWD; San Andres

Pool Code – 96121

	2
Injection Interval - Cased-hole injection between 4,408' - 5,510'	ISEP
Drilling Purpose - New drill for injection	5
Other Perforated Intervals: No other perforated intervals exist.	່ວ່າ
Overlying Oil and Gas Zones:	
• Yates (2,729')	ې
• 7 Rivers (3,006')	02

- Queen (3,586')
- Grayburg (3,969')

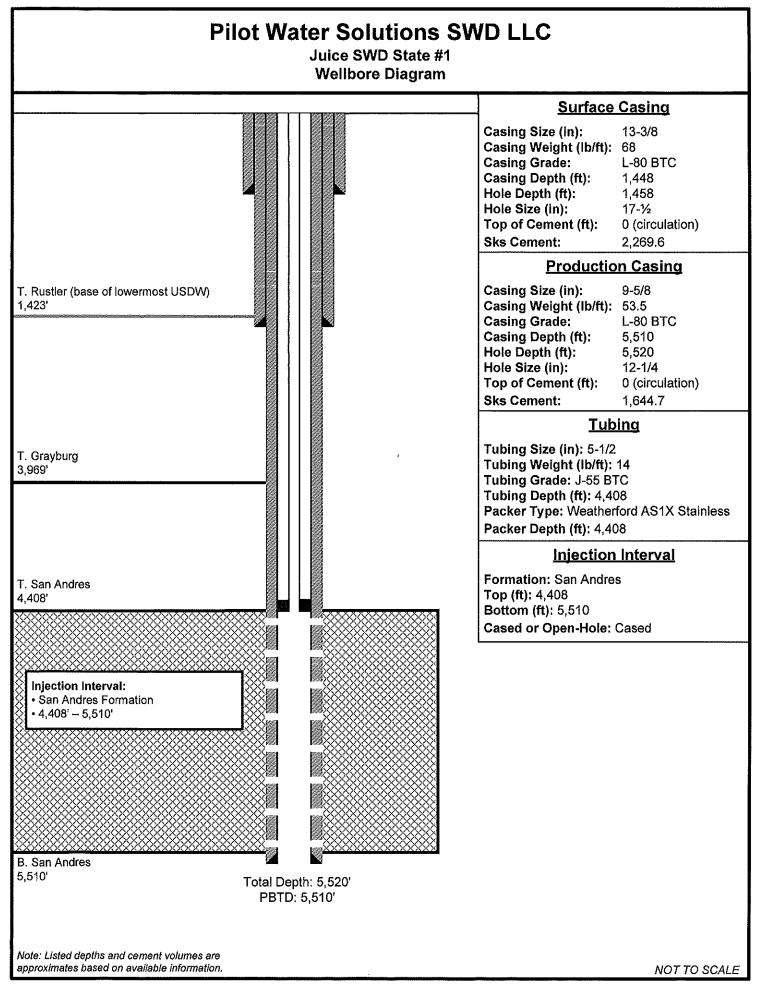
Underlying Oil and Gas Zones - None

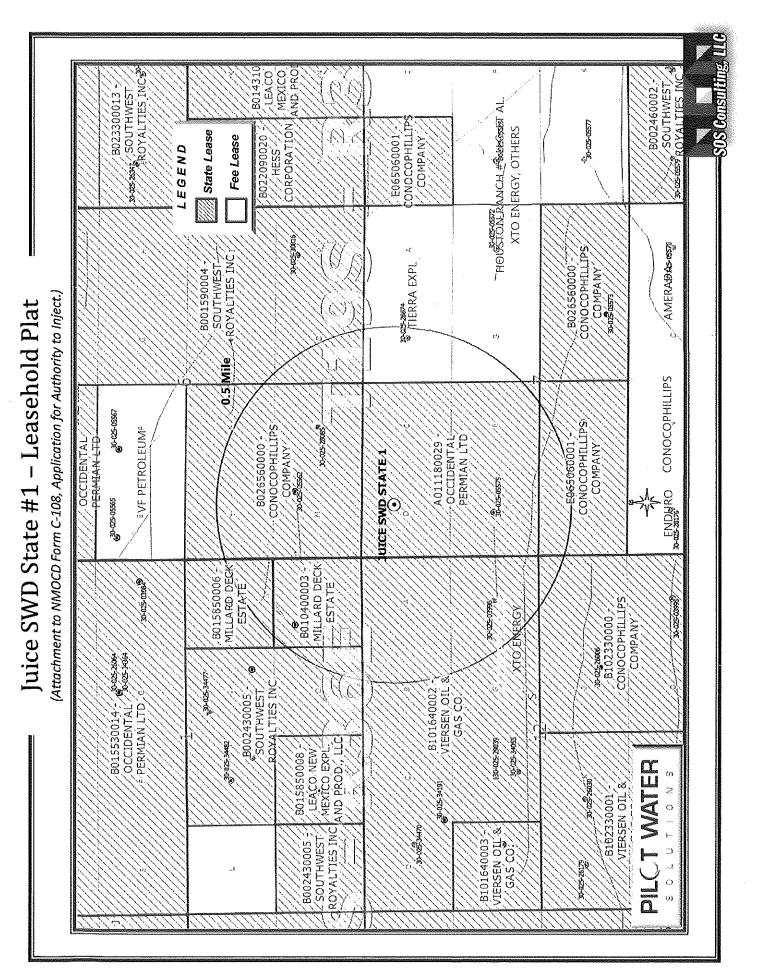
Geologic Description of Injection Interval - The proposed injection interval is located in the San Andres formation between the depths of 4,408 and 5,510 feet. The San Andres formation consists of an interbedded carbonate sequence composed of limestone and dolomite. These cycles tend to be mappable within the San Andres and are differentiated by sections of either very high or very low porosity and permeability development. Upper and lower confinement will be provided by tight carbonate facies present within San Andres that occur above and below the porous injection interval. The upper confining interval occurs at the top of the San Andres formation, directly underlying the Grayburg formation, and ranges from 125' – 150' net thickness based on a review of nearby open-hole geophysical logs. The lower confining interval occurs at the bottom of the San Andres formation, directly overlying the Glorieta formation, and ranges from 150' - 200' net thickness based on a review of nearby open-hole geophysical logs.

The base of the lowermost Underground Source of Drinking Water (USDW), identified as the top of the first anhydrite, was determined to occur at the top of the Rustler formation at a depth of 1,423'. Water wells in the area are drilled to a depth of approximately 95' - 143'.

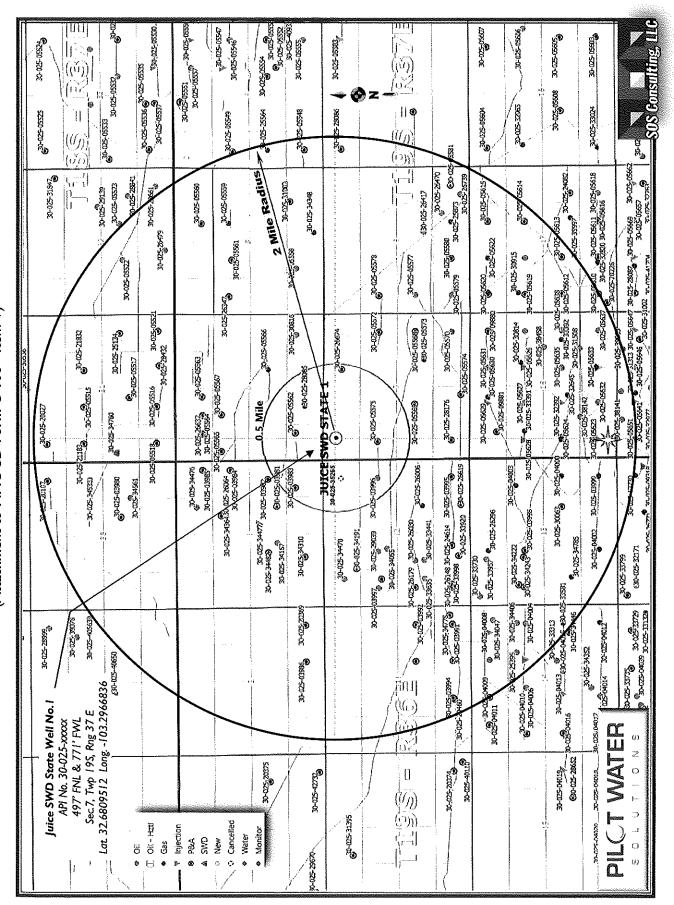
Operational Data

Proposed Maximum Injection Rate: 25,000 BWPD Proposed Average Injection Rate: 15,000 BWPD Proposed Maximum Injection Pressure: 882 psi (surface) Proposed Average Injection Pressure: 500-600 psi (surface)





Juice SWD State Well No.1 - Area of Review - 2 Miles (Attachment to NMOCD Form C-108 - Item V)



ACE A Energy Advisors

August 23, 2023

RECEIVED Apache Corp

AUG 2 9 2023

Permian-Midland Regulatory

Subject: Pilot Water Solutions SWD LLC Notice of Application for Authorization to Inject Jameis SWD State #1

Dear Sir or Madam,

Pilot Water Solutions SWD LLC (Pilot) is applying for administrative approval of an Application for Authorization to Inject (Form C-108) for their proposed Jameis SWD State #1. Per New Mexico Oil Conservation Division (NMOCD) requirements, you are being notified of the application as an Affected Person and are being provided with a copy of the application for review.

Applicant Name:Pilot Water Solutions SWD LLCOperator Address:20 Greenway Plaza, Suite 200, Houston, TX 77046Well Name:Jameis SWD State #1Location:1,429' FSL & 458' FEL in Section 7 T19S R37E, in Lea County, NMInjection Formation:San AndresInjection Type:Commercial Disposal

Objections or requests for hearing must be filed with NMOCD within fifteen (15) days of receipt. Any objection or request for hearing should be mailed to the Oil Conservation Division, 1220 South St. Francis Dr., Santa Fe, New Mexico 87505.

Questions regarding this application or the included materials can be directed to Nate Alleman (Pilot Regulatory Advisor Contractor) via telephone at 918-237-0559 or via email at nate.alleman@aceadvisors.com.

Sincerely,

Received by OCD: 9/29/2023 10:52:00 AM

Nate Alleman Chief Regulatory Advisor Ace Energy Advisors

Well Data

Operator - Pilot Water Solutions SWD LLC Lease/Well Name & Number - Jameis SWD State #1 Legal Location - 1,429' FSL & 458' FEL - Unit I – Section 7 T19S R37E – Lea County

Casing Data

Casing String	Hole Size (in)	Casing Size (in)	n) (ft) (sx)		Top of Cement (ft)	Method Determined
Surface	17-1/2	13-3/8	1,418	2,222.6	0	Circulation
Production	12-1/4	9-5/8	5,496	1,640.6	0	Circulation

Tubing: 5-1/2" fiberglass-coated tubing set at 4,257' **Packer:** Weatherford AS1X Stainless 9-5/8" X 5-1/2" set 4,257'

Geology Data

Injection Formation Name - San Andres

Pool Name - SWD; San Andres

Pool Code - 96121

Injection Interval - Cased-hole injection between 4,257' - 5,496'

Drilling Purpose - New drill for injection

Other Perforated Intervals: No other perforated intervals exist.

Overlying Oil and Gas Zones:

- Yates (2,668')
- 7 Rivers (2,928')
- Queen (3,441')
- Grayburg (3,776')

Underlying Oil and Gas Zones - None

Geologic Description of Injection Interval - The proposed injection interval is located in the San Andres formation between the depths of 4,257 and 5,496 feet. The San Andres formation consists of an interbedded carbonate sequence composed of limestone and dolomite. These cycles tend to be mappable within the San Andres and are differentiated by sections of either very high or very low porosity and permeability development. Upper and lower confinement will be provided by tight carbonate facies present within San Andres that occur above and below the porous injection interval. The upper confining interval occurs at the top of the San Andres formation, directly underlying the Grayburg formation, and ranges from 125' – 150' net thickness based on a review of nearby open-hole geophysical logs. The lower confining interval occurs at the bottom of the San Andres formation, directly overlying the Glorieta formation, and ranges from 150' - 200' net thickness based on a review of nearby open-hole geophysical logs.

The base of the lowermost Underground Source of Drinking Water (USDW), identified as the top of the first anhydrite, was determined to occur at the top of the Rustler formation at a depth of 1,393'. Water wells in the area are drilled to a depth of approximately 95' - 143'.

Operational Data

Proposed Maximum Injection Rate: 25,000 BWPD Proposed Average Injection Rate: 15,000 BWPD Proposed Maximum Injection Pressure: 851 psi (surface) Proposed Average Injection Pressure: 500-600 psi (surface)

Received by OCD: 9/29/2023 10:52:00 AM

Pilot Water Solutions SWD LLC Jameis SWD State #1 **Wellbore Diagram** Surface Casing Casing Size (in): 13-3/8 Casing Weight (lb/ft): 68 Casing Grade: L-80 BTC Casing Depth (ft): 1,418 Hole Depth (ft): 1,428 Hole Size (in): 17-1/2 Top of Cement (ft): 0 (circulation) Sks Cement: 2,222.6 **Production Casing** 9-5/8 Casing Size (in): T. Rustler (base of lowermost USDW) 1,393' Casing Weight (lb/ft): 53.5 **Casing Grade:** L-80 BTC Casing Depth (ft): 5,496 Hole Depth (ft): 5,506 Hole Size (in): 12-1/4 Top of Cement (ft): 0 (circulation) Sks Cement: 1,640.6 Tubing Tubing Size (in): 5-1/2 T. Grayburg Tubing Weight (lb/ft): 14 3,776' Tubing Grade: J-55 BTC Tubing Depth (ft): 4,257 Packer Type: Weatherford AS1X Stainless Packer Depth (ft): 4,257 **Injection Interval** Formation: San Andres T. San Andres Top (ft): 4.257 4,257' Bottom (ft): 5,496 Cased or Open-Hole: Cased Injection Interval: San Andres Formation • 4.257' - 5.496' B. San Andres 5.496' Total Depth: 5,496'

PBTD: 5,506'

Note: Listed depths and cement volumes are approximates based on available information.

Received by OCD: 9/29/2023 10:52:00 AM

Page 16 of 23

NOT TO SCALE

Received by OCD: 9/29/2023 10:52:00 AM

Jameis SWD State Well No.1 - Area of Review - 2 Miles

(Attachment to NMOCD Form C-108 - Item V)

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AUG 2 9 2023

August 23, 2023

Permian-Midland Regulatory

Subject: Pilot Water Solutions SWD LLC Notice of Application for Authorization to Inject Toretta SWD State #1

Dear Sir or Madam,

Pilot Water Solutions SWD LLC (Pilot) is applying for administrative approval of an Application for Authorization to Inject (Form C-108) for their proposed Toretta SWD State #1. Per New Mexico Oil Conservation Division (NMOCD) requirements, you are being notified of the application as an Affected Person and are being provided with a copy of the application for review.

Applicant Name:	Pilot Water Solutions SWD LLC
Operator Address:	20 Greenway Plaza, Suite 200, Houston, TX 77046
Well Name:	Toretta SWD State #1
Legal Location:	545' FNL & 2,510' FEL, Section 17 T19S R37E, in Lea County, NM
Injection Formation:	San Andres
Injection Type:	Commercial Disposal

Objections or requests for hearing must be filed with NMOCD within fifteen (15) days of receipt. Any objection or request for hearing should be mailed to the Oil Conservation Division, 1220 South St. Francis Dr., Santa Fe, New Mexico 87505.

Questions regarding this application or the included materials can be directed to Nate Alleman (Pilot Regulatory Advisor Contractor) via telephone at 918-237-0559 or via email at nate.alleman@aceadvisors.com.

Sincerely,

Nate Alleman Chief Regulatory Advisor Ace Energy Advisors

Well Data

Operator - Pilot Water Solutions SWD LLC Lease/Well Name & Number - Toretta SWD State #1 Legal Location - 545' FNL & 2,510' FEL - Unit B – Section 17 T19S R37E – Lea County

Casing Data

Casing String	Hole Size (in)	Casing Size (in)	Casing Depth (ft)	Sacks Cement (sx)	Top of Cement (ft)	Method Determined
Surface	17-1/2	13-3/8	1,420	2,225.7	0	Circulation
Production	12-1/4	9-5/8	5,484	1,637	0	Circulation

Tubing: 5-1/2" fiberglass-coated tubing set at 4,183'

Packer: Weatherford AS1X Stainless 9-5/8" X 5-1/2" set at 4,183'

Geology Data

Injection Formation Name - San Andres

Pool Name - SWD; San Andres

Pool Code - 96121

Injection Interval - Cased-hole injection between 4,183' - 5'484'

Drilling Purpose - New drill for injection

Other Perforated Intervals: No other perforated intervals exist.

Overlying Oil and Gas Zones:

- Yates (2,682')
- 7 Rivers (2,956')
- Queen (3,393')
- Grayburg (3,708)

Underlying Oil and Gas Zones - None

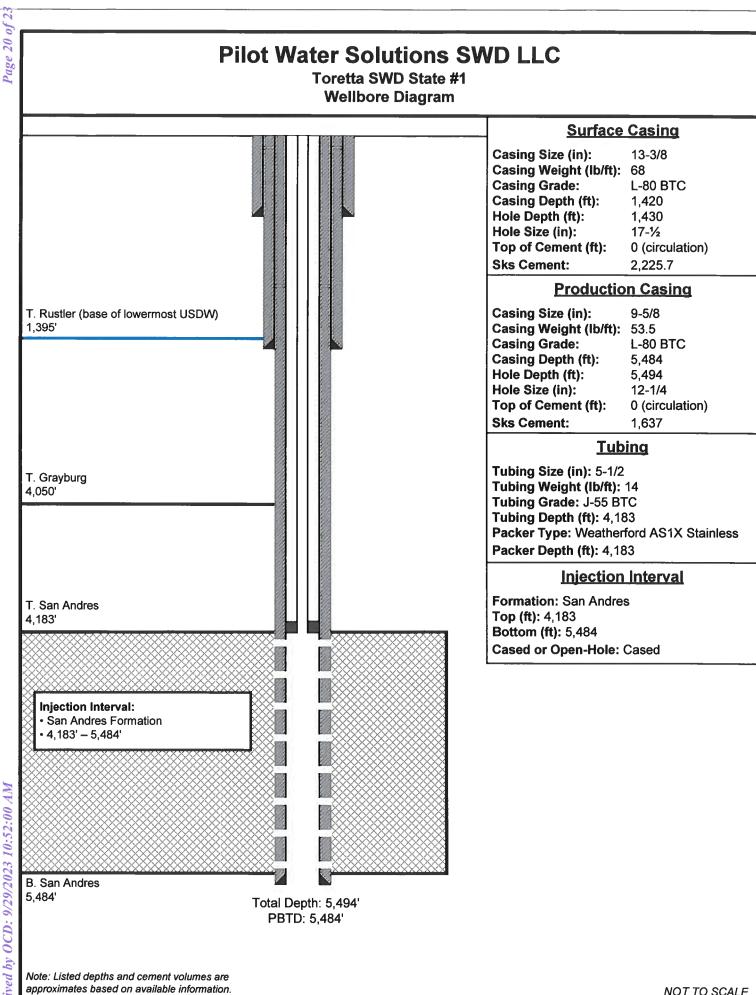
Geologic Description of Injection Interval - The proposed injection interval is located in the San Andres formation between the depths of 4,183 and 5,484 feet. The San Andres formation consists of an interbedded carbonate sequence composed of limestone and dolomite. These cycles tend to be mappable within the San Andres and are differentiated by sections of either very high or very low porosity and permeability development. Upper and lower confinement will be provided by tight carbonate facies present within San Andres that occur above and below the porous injection interval. The upper confining interval occurs at the top of the San Andres formation, directly underlying the Grayburg formation, and ranges from 125' – 150' net thickness based on a review of nearby open-hole geophysical logs. The lower confining interval occurs at the bottom of the San Andres formation, directly overlying the Glorieta formation, and ranges from 150' - 200' net thickness based on a review of nearby open-hole geophysical logs.

The base of the lowermost Underground Source of Drinking Water (USDW), identified as the top of the first anhydrite, was determined to occur at the top of the Rustler formation at a depth of 1,395'. Water wells in the area are drilled to a depth of approximately 90' - 150'.

Operational Data

Proposed Maximum Injection Rate: 25,000 BWPD Proposed Average Injection Rate: 15,000 BWPD Proposed Maximum Injection Pressure: 837 psi (surface) Proposed Average Injection Pressure: 500-600 psi (surface)

Received by OCD: 9/29/2023 10:52:00 AM



NOT TO SCALE

Toretta SWD State Well No.1 - Area of Review - 2 Miles

(Attachment to NMOCD Form C-108 - Item V)

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THURSDAY, AUGUST 24, 2023

LEGAL

LEGAL NOTICE August 24, 2023

LEGAL

Pilot Water Solutions SWD LLC, 20 Greenway Plaza, Suite 200, Houston, TX 77046, is filing Form C-108 (Application for Authorization to Inject) with the New Mexico Oil Conservation Division seeking administrative approval for commercial saltwater injection into its Cannon SWD State #1. This will be a new well located 2,363' FNL & 1,271' FEL in Section 9 Township 19S Range 37E in Lea County, New Mexico. The purpose of the well is to inject produced water from permitted oil and gas wells in the area for commercial disposal into the San Andres formation at depths of 4,237' – 5,568' at a maximum surface injection pressure of 847 psi and a maximum injection rate of 25,000 barrels of water per day.

Objections or requests for hearing must be filed with the New Mexico Oil Conservation Division within fifteen (15) days. Any objection or request for hearing should be mailed to the Oil Conservation Division, 1220 South St. Francis Dr., Santa Fe, New Mexico 87505. Additional information may be obtained by contacting the operator contact, David Grounds, at 713-307-8752. #00281927

LEGAL

LEGAL NOTICE August 24, 2023

LEGAL

Pilot Water Solutions SWD LLC, 20 Greenway Plaza, Suite 200, Houston, TX 77046, is filing Form C-108 (Application for Authorization to Inject) with the New Mexico Oil Conservation Division seeking administrative approval for commercial saltwater injection into its Burrow SWD State #1. This will be a new well located 458' FNL & 1,612' FWL Section 5 Township 19S Range 37E in Lea County, New Mexico. The purpose of the well is to inject produced water from permitted oil and gas wells in the area for commercial disposal into the San Andres formation at depths of 4,330' – 5,629' at a maximum surface injection pressure of 866 psi and a maximum injection rate of 25,000 barrels of water per day.

Objections or requests for hearing must be filed with the New Mexico Oil Conservation Division within fifteen (15) days. Any objection or request for hearing should be mailed to the Oil Conservation Division, 1220 South St. Francis Dr., Santa Fe, New Mexico 87505. Additional information may be obtained by contacting the operator contact, David Grounds, at 713-307-8752.

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Released to Imaging: 9/29/2023 10:54:48 AM

District I 1625 N. French Dr., Hobbs, NM 88240 Phone:(575) 393-6161 Fax:(575) 393-0720 District II

811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720

District III

1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

District IV 1220 S. St Francis Dr., Santa Fe, NM 87505 Phone: (505) 476-3470 Fax: (505) 476-3462

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505

CONDITIONS

Operator:	OGRID:
Pilot Water Solutions SWD LLC	331374
20 Greenway Plaza, Suite 200	Action Number:
Houston, TX 77046	270652
	Action Type:
	[IM-SD] Admin Order Support Doc (ENG) (IM-AAO)

CONDITIONS

Created By	Condition	Condition Date
mgebremichael	None	9/29/2023

Action 270652

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