

Protested SWD Application

By NMSLO; received 9/13/2023

From: [Gebremichael, Million, EMNRD](#)
To: [Nate Alleman](#)
Cc: [McMillan, Michael A.](#); [McClure, Dean, EMNRD](#); [Goetze, Phillip, EMNRD](#); [Tremaine, Jesse, EMNRD](#); [Harris, Anthony, EMNRD](#)
Subject: Notification of Protest for application to Inject : O'Brien SWD State #1, Jameis SWD State #1, Juice SWD State #1, Toretta SWD State #1
Date: Wednesday, September 27, 2023 10:10:00 AM
Attachments: [image001.png](#)

Mr. Alleman,

The OCD was notified by New Mexico State Land Office (NMSLO) 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. Juice SWD State #1, Located in 497' FNL & 771' FWL in Section 7 T19S R37E
4. Toretta SWD State #1, Located 545' FNL & 2,510' FEL in Section 17 T19S R37E

NMSLO 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 If the protest is withdrawn, then the applications could be processed administratively.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

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

All applications are in Lea County New Mexico.

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: dean.gaines@apachecorp.com or direct at: (432) 818-1803.

Sincerely,

A handwritten signature in blue ink that reads "Dean Gaines".

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,

A handwritten signature in black ink that reads "Nathan 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 (in)	Casing Depth (ft)	Sacks Cement (sx)	Top of Cement (ft)	Method Determined
Surface	17-1/2	13-3/8	1,458	2,285.3	0	Circulation
Production	12-1/4	9-5/8	5,555	1,658.2	0	Circulation

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**Pool Name** - SWD; San Andres**Pool Code** – 96121**Injection Interval** - Cased-hole injection between 4,312' – 5,555'**Drilling Purpose** - New drill for injection**Other Perforated Intervals:** No other perforated intervals exist.**Overlying Oil and Gas Zones:**

- Yates (2,707')
- 7 Rivers (2,969')
- Queen (3,495')
- Grayburg (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.

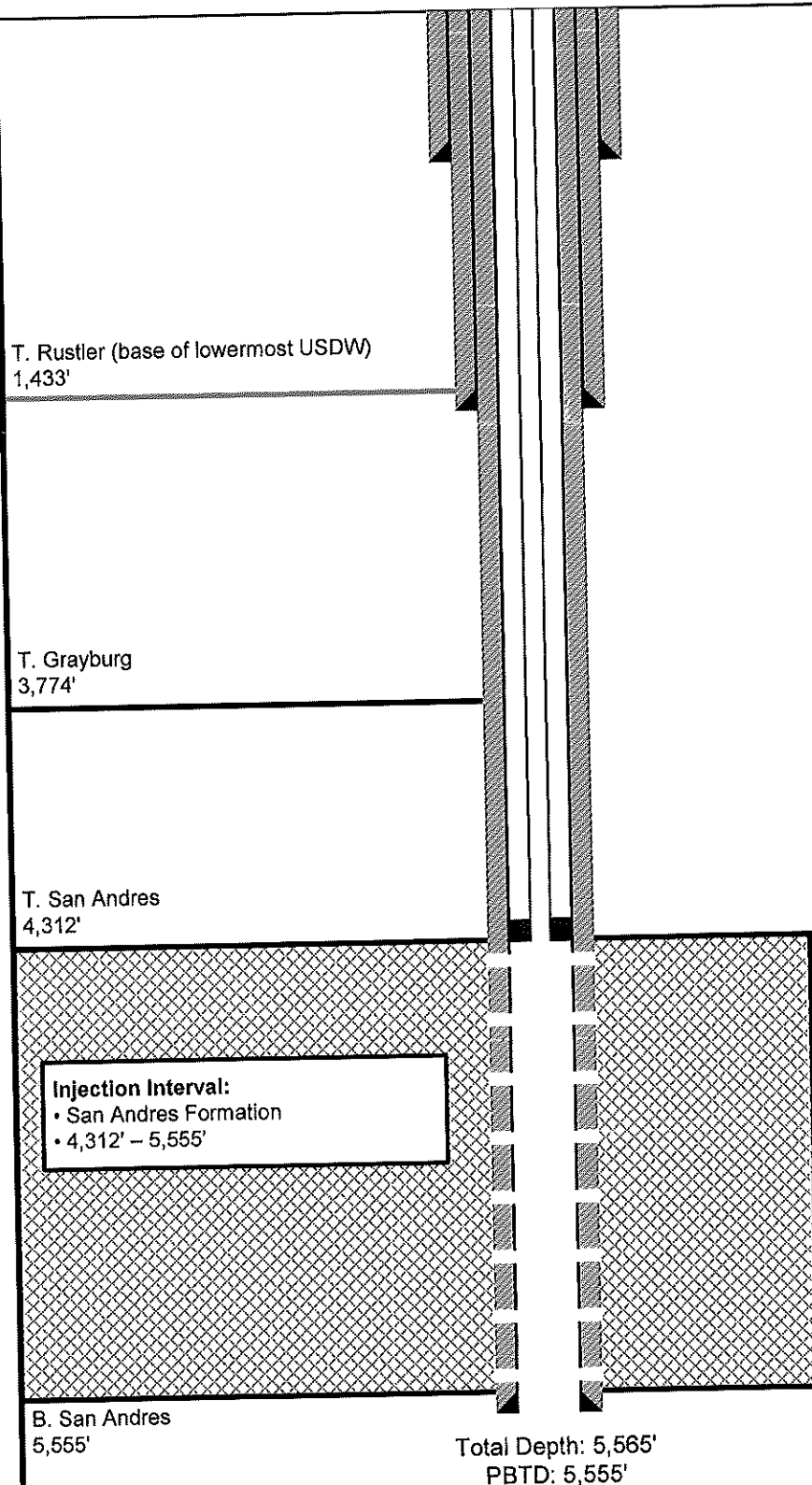
The base of the lowermost Underground Source of Drinking Water (USDW), identified as the top of the first anhydrite, was determined to occur at the top of the Rustler formation at a depth of 1,433'. Water wells in the area are drilled to a depth of approximately 100' – 200'.

Operational Data**Proposed Maximum Injection Rate:** 25,000 BWP/D**Proposed Average Injection Rate:** 15,000 BWP/D**Proposed Maximum Injection Pressure:** 862 psi (surface)**Proposed Average Injection Pressure:** 500-600 psi (surface)

2023 SEP -5 AM 9:03

Pilot Water Solutions SWD LLC

O'Brien 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): 1,458
Hole Depth (ft): 1,468
Hole Size (in): 17-1/2
Top of Cement (ft): 0 (circulation)
Sks Cement: 2,285.3

Production Casing

Casing Size (in): 9-5/8
Casing Weight (lb/ft): 53.5
Casing Grade: L-80 BTC
Casing Depth (ft): 5,555
Hole Depth (ft): 5,565
Hole Size (in): 12-1/4
Top of Cement (ft): 0 (circulation)
Sks Cement: 1,658.2

Tubing

Tubing Size (in): 5-1/2
Tubing Weight (lb/ft): 14
Tubing Grade: J-55 BTC
Tubing Depth (ft): 4,312
Packer Type: Weatherford AS1X Stainless
Packer Depth (ft): 4,312

Injection Interval

Formation: San Andres
Top (ft): 4,312
Bottom (ft): 5,555
Cased or Open-Hole: Cased

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

NOT TO SCALE

(Attachment to NMOCD Form C-108, Application for Authority to Inject.)



SOS Consulting, LLC

(Attachment to NMOC Form C-108, Application for Authority to Inject.)





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,

A handwritten signature in black ink that reads "Nathan Alleman".

Nate Alleman
Chief Regulatory Advisor
Ace Energy Advisors

2023 SEP -5 AM 9:02

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****Injection Interval - Cased-hole injection between 4,408' - 5,510'****Drilling Purpose - New drill for injection****Other Perforated Intervals: No other perforated intervals exist.****Overlying Oil and Gas Zones:**

- Yates (2,729')
- 7 Rivers (3,006')
- 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.

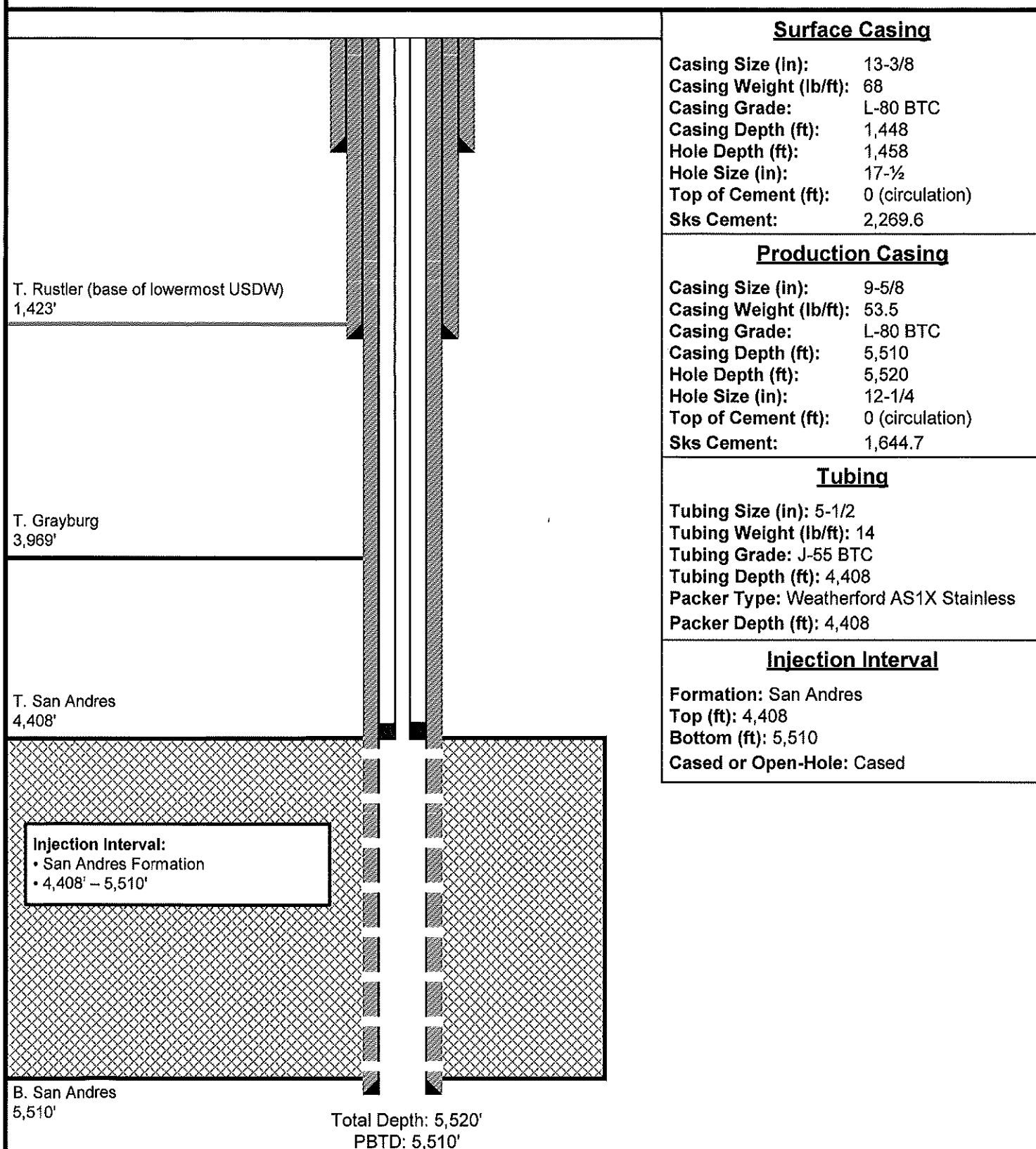
The base of the lowermost Underground Source of Drinking Water (USDW), identified as the top of the first anhydrite, was determined to occur at the top of the Rustler formation at a depth of 1,423'. Water wells in the area are drilled to a depth of approximately 95' – 143'.

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)**

2023 SEP -5 AM 9:02

Pilot Water Solutions SWD LLC

Juice SWD State #1 Wellbore Diagram

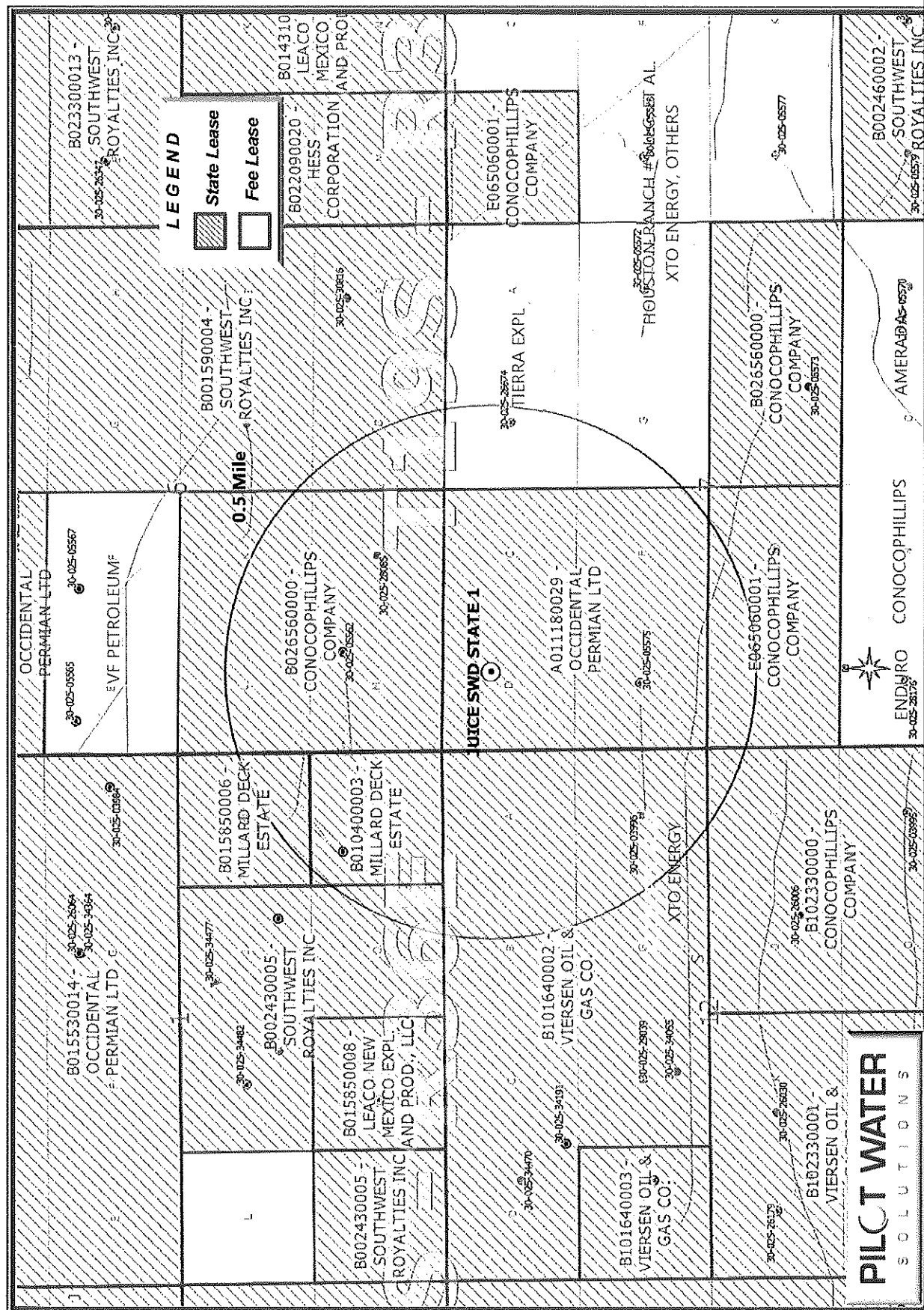


Note: Listed depths and cement volumes are approximates based on available information.

NOT TO SCALE

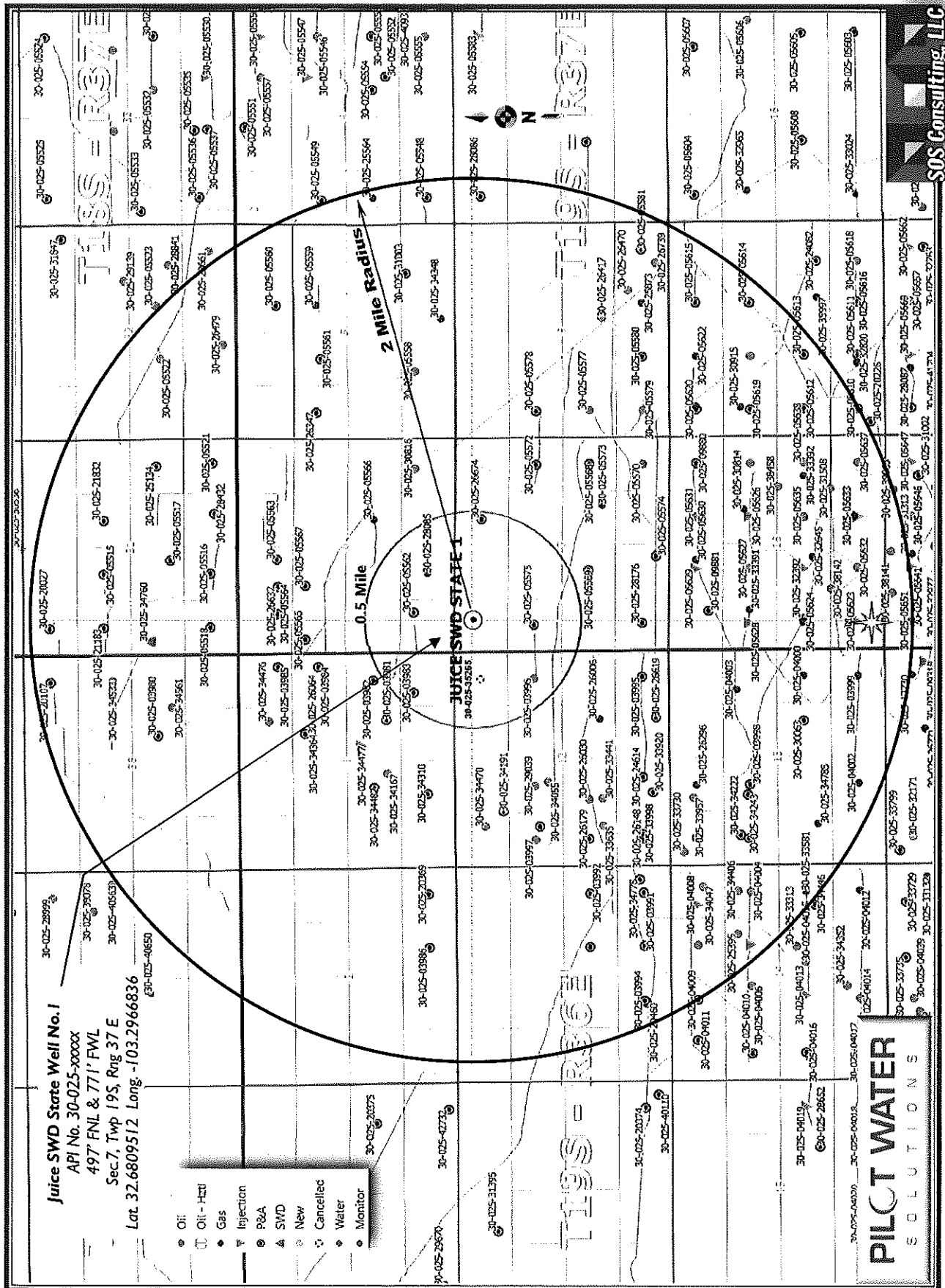
Juice SWD State #1 – Leasehold Plat

(Attachment to NMOCD Form C-108, Application for Authority to Inject.)



SOS Consulting, LLC

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





RECEIVED
Apache Corp

AUG 29 2023

August 23, 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 LLC
Operator Address: 20 Greenway Plaza, Suite 200, Houston, TX 77046
Well Name: Jameis SWD State #1
Location: 1,429' FSL & 458' FEL 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,

A handwritten signature in black ink that reads "Nathan Alleman".

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)	Casing Depth (ft)	Sacks Cement (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

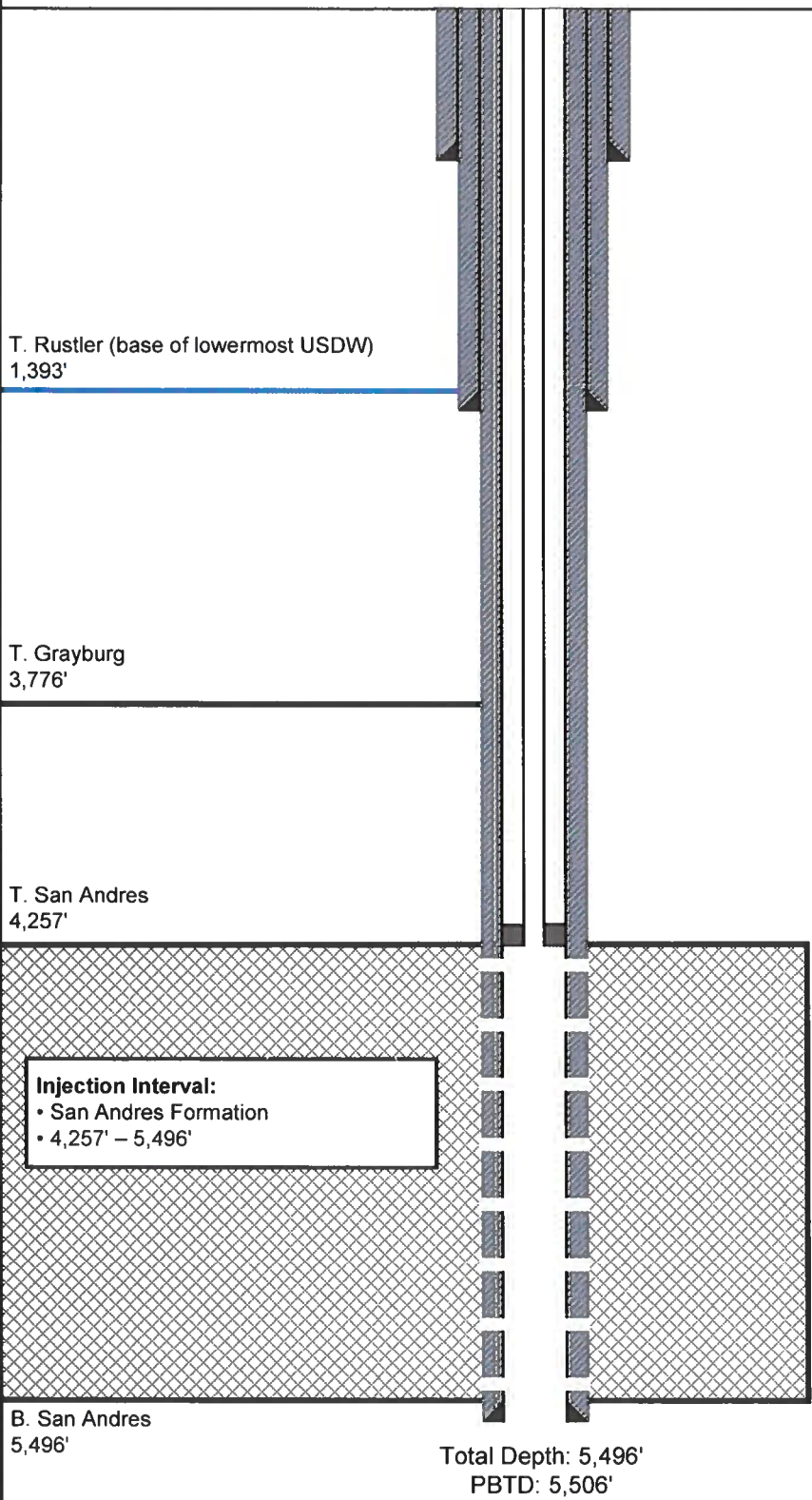
Proposed Maximum Injection Rate: 25,000 BWPD

Proposed Average Injection Rate: 15,000 BWPD

Proposed Maximum Injection Pressure: 851 psi (surface)

Proposed Average Injection Pressure: 500-600 psi (surface)

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

Casing Size (in): 9-5/8
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
Tubing Weight (lb/ft): 14
Tubing Grade: J-55 BTC
Tubing Depth (ft): 4,257
Packer Type: Weatherford AS1X Stainless
Packer Depth (ft): 4,257

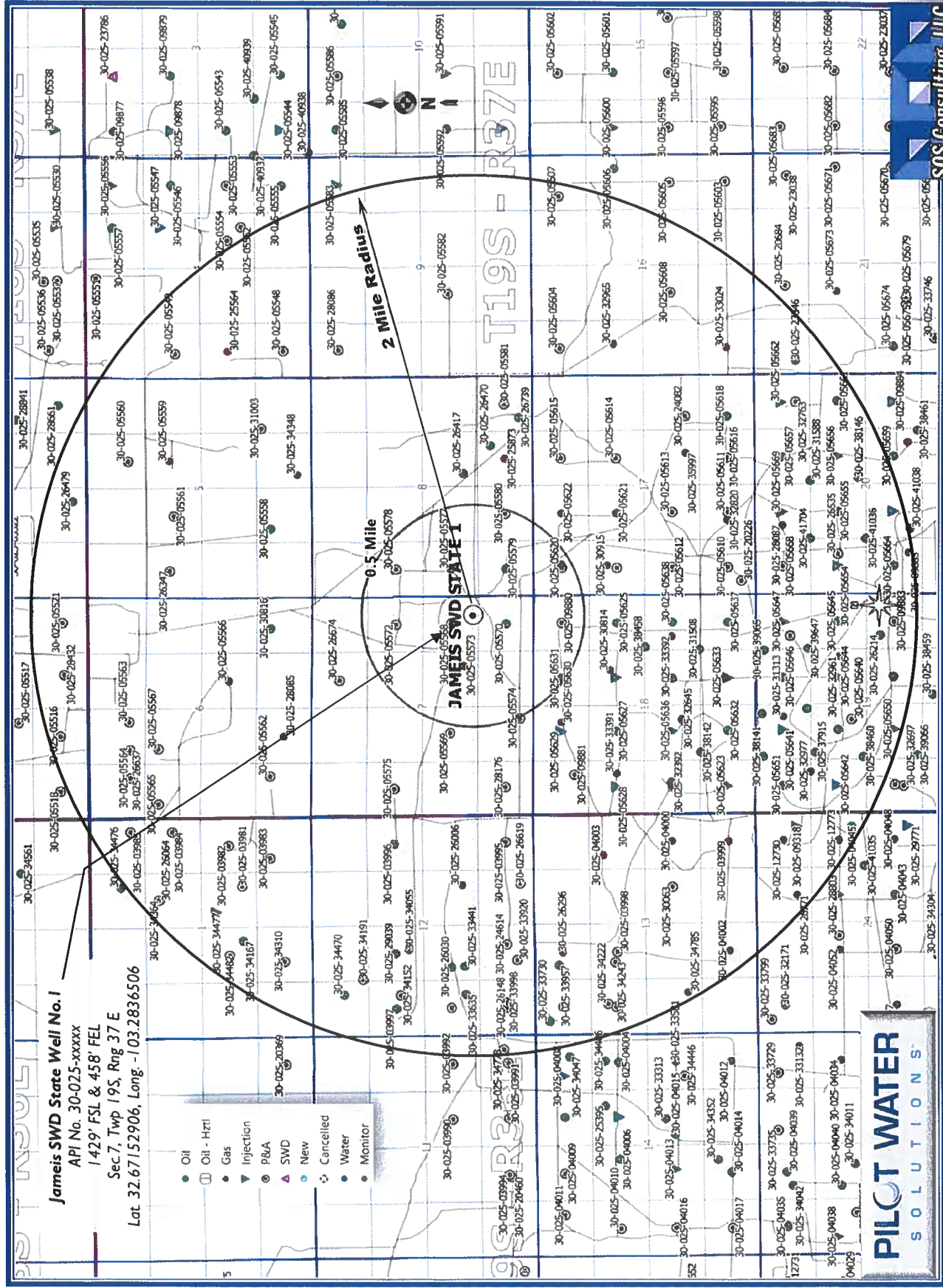
Injection Interval

Formation: San Andres
Top (ft): 4,257
Bottom (ft): 5,496
Cased or Open-Hole: Cased

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

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

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





RECEIVED
Apache Corp

AUG 29 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,

A handwritten signature in black ink that reads "Nate Alleman".

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

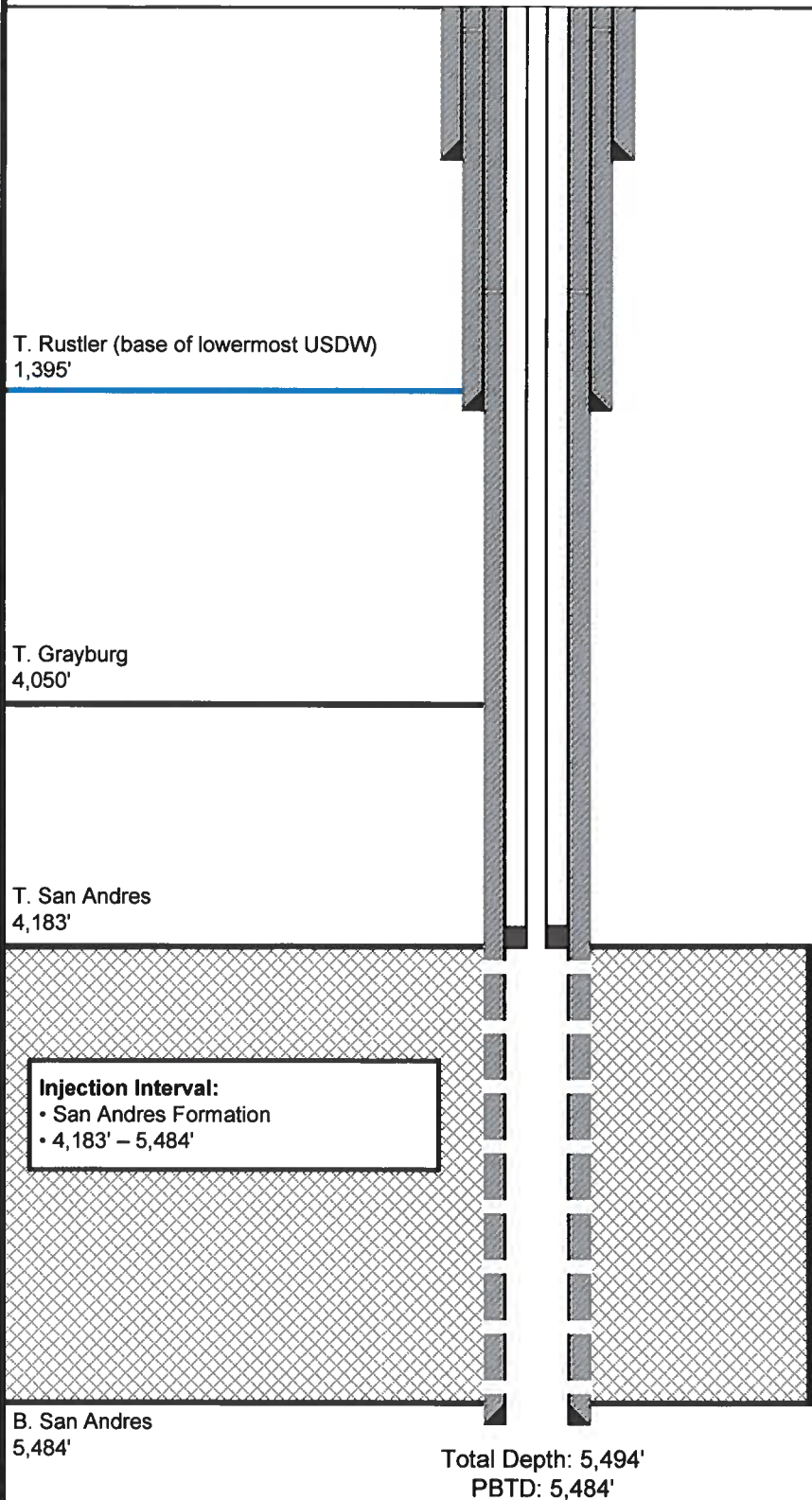
Proposed Maximum Injection Rate: 25,000 BWPD

Proposed Average Injection Rate: 15,000 BWPD

Proposed Maximum Injection Pressure: 837 psi (surface)

Proposed Average Injection Pressure: 500-600 psi (surface)

Pilot Water Solutions SWD LLC
Toretta 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):	1,420
Hole Depth (ft):	1,430
Hole Size (in):	17-1/2
Top of Cement (ft):	0 (circulation)
Sks Cement:	2,225.7

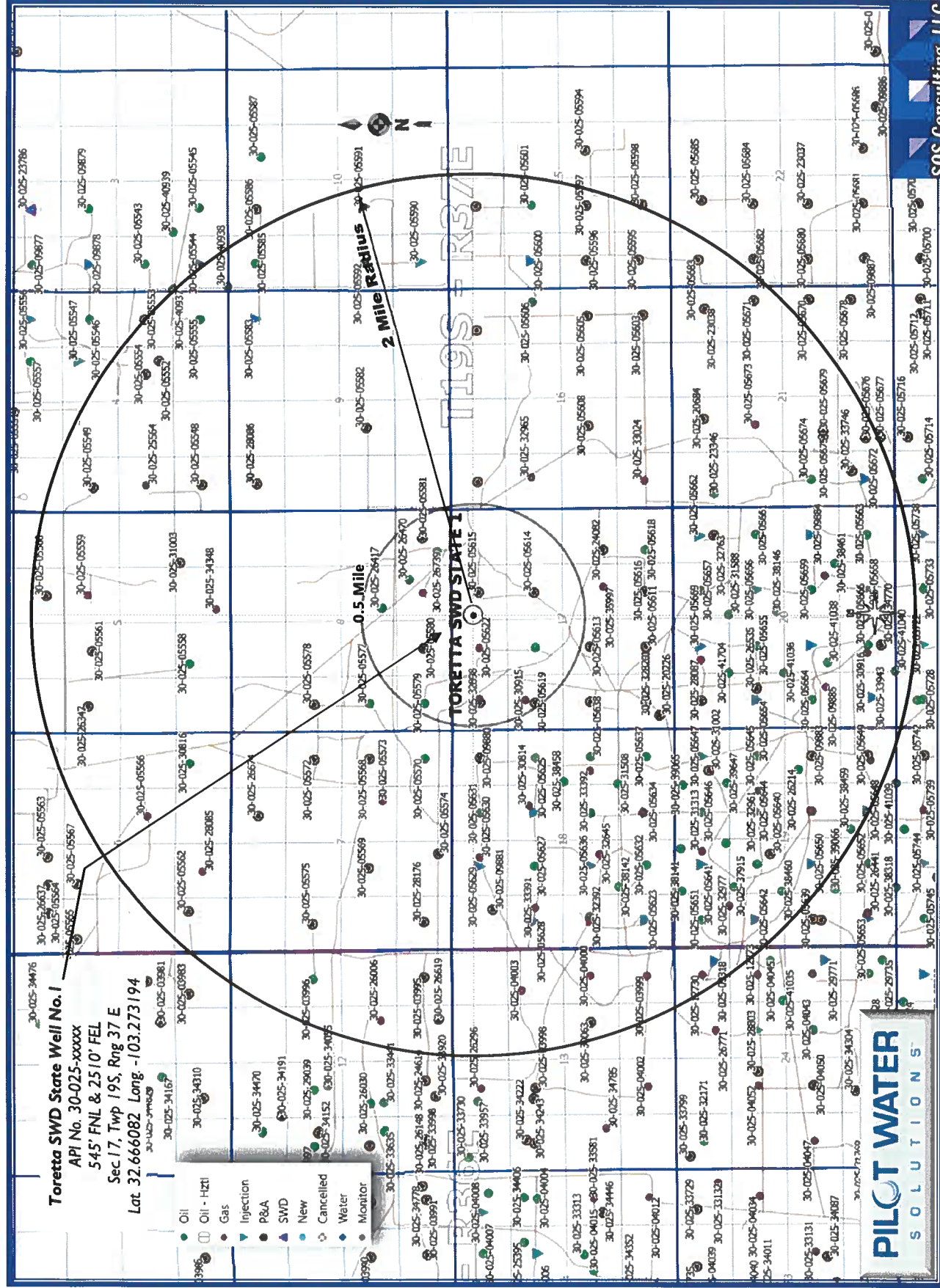
Production Casing	
Casing Size (in):	9-5/8
Casing Weight (lb/ft):	53.5
Casing Grade:	L-80 BTC
Casing Depth (ft):	5,484
Hole Depth (ft):	5,494
Hole Size (in):	12-1/4
Top of Cement (ft):	0 (circulation)
Sks Cement:	1,637

Tubing	
Tubing Size (in):	5-1/2
Tubing Weight (lb/ft):	14
Tubing Grade:	J-55 BTC
Tubing Depth (ft):	4,183
Packer Type:	Weatherford AS1X Stainless
Packer Depth (ft):	4,183

Injection Interval	
Formation:	San Andres
Top (ft):	4,183
Bottom (ft):	5,484
Cased or Open-Hole:	Cased

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

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



THURSDAY, AUGUST 24, 2023

LEGAL**LEGAL****LEGAL NOTICE
August 24, 2023**

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****LEGAL NOTICE
August 24, 2023**

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.

#00281925

Protested SWD Application

By V-F Petroleum,INC; received
9/19/2023

From: [Gebremichael, Million, EMNRD](#)
To: [Nate Alleman](#)
Cc: DHardy@hinklawfirm.com; [Goetze, Phillip, EMNRD](#); [Tremaine, Jesse, EMNRD](#); [Harris, Anthony, EMNRD](#); [McClure, Dean, EMNRD](#)
Subject: Notification of Protest for application to Inject : O'Brien SWD State #1, Flutie SWD State #1
Date: Wednesday, September 27, 2023 11:30:00 AM
Attachments: [image001.png](#)

Mr. Alleman,

The OCD was notified by V-F Petroleum, Inc. ("V-F") 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 Unit M, Section 5 T19S R37E
2. Flutie SWD State #1, Located in 2437' FSL & 918' FWL in Unit L, Section 6 T19S R37E

V-F 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



From: [McClure, Dean, EMNRD](#) on behalf of [Engineer, OCD, EMNRD](#)
To: [Goetze, Phillip, EMNRD](#); [Gebremichael, Million, EMNRD](#); [Harris, Anthony, EMNRD](#)
Subject: FW: [EXTERNAL] Objection to Pilot Water Solutions SWD LLC Administrative SWD Applications
Date: Tuesday, September 19, 2023 10:15:15 AM
Attachments: [image001.png](#)
[Notice of App to Inject - Flutie SWD State 1 - Pilot Water Solutions SWD LLC.pdf](#)
[Notice of App to Inject - O'Brien SWD 1 - Pilot Water Solutions SWD LLC.pdf](#)

Marking as unread and placing in the protests folder.

Dean McClure
Petroleum Engineer, Oil Conservation Division
New Mexico Energy, Minerals and Natural Resources Department
(505) 469-8211

From: Dana Hardy <DHardy@hinklelawfirm.com>
Sent: Tuesday, September 19, 2023 9:58 AM
To: Engineer, OCD, EMNRD <OCD.Engineer@emnrd.nm.gov>; McClure, Dean, EMNRD <Dean.McClure@emnrd.nm.gov>
Cc: Dana Hardy <DHardy@hinklelawfirm.com>; Jaclyn McLean <JMcLean@hinklelawfirm.com>
Subject: [EXTERNAL] Objection to Pilot Water Solutions SWD LLC Administrative SWD Applications

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Good morning,

I'm writing on behalf of V-F Petroleum, Inc. ("V-F") to object to the two attached administrative applications for authorization to inject into the Flutie SWD State #1 and O'Brien SWD State #1 Wells. V-F owns oil and gas interests in this area, is an affected party, and would be adversely impacted by Pilot Water Solutions SWD LLC's applications.

Please let me know if you require any additional information.

Best regards,
Dana



Dana S. Hardy
Partner
Hinkle Shanor LLP
218 Montezuma
Santa Fe, New Mexico 87501
(505) 982-4554 telephone
(505) 930-5702 direct
(505) 982-8623 facsimile
dhardy@hinklelawfirm.com

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August 30, 2023

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

Rec'd 9/5/23.

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,

A handwritten signature in black ink that reads "Nathan Alleman".

Nate Alleman
Chief Regulatory Advisor
Ace Energy Advisors

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 (in)	Casing Depth (ft)	Sacks Cement (sx)	Top of Cement (ft)	Method Determined
Surface	17-1/2	13-3/8	1,458	2,285.3	0	Circulation
Production	12-1/4	9-5/8	5,555	1,658.2	0	Circulation

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**Pool Name** - SWD; San Andres**Pool Code** – 96121**Injection Interval** - Cased-hole injection between 4,312' – 5,555'**Drilling Purpose** - New drill for injection**Other Perforated Intervals:** No other perforated intervals exist.**Overlying Oil and Gas Zones:**

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

Underlying Oil and Gas Zones – None

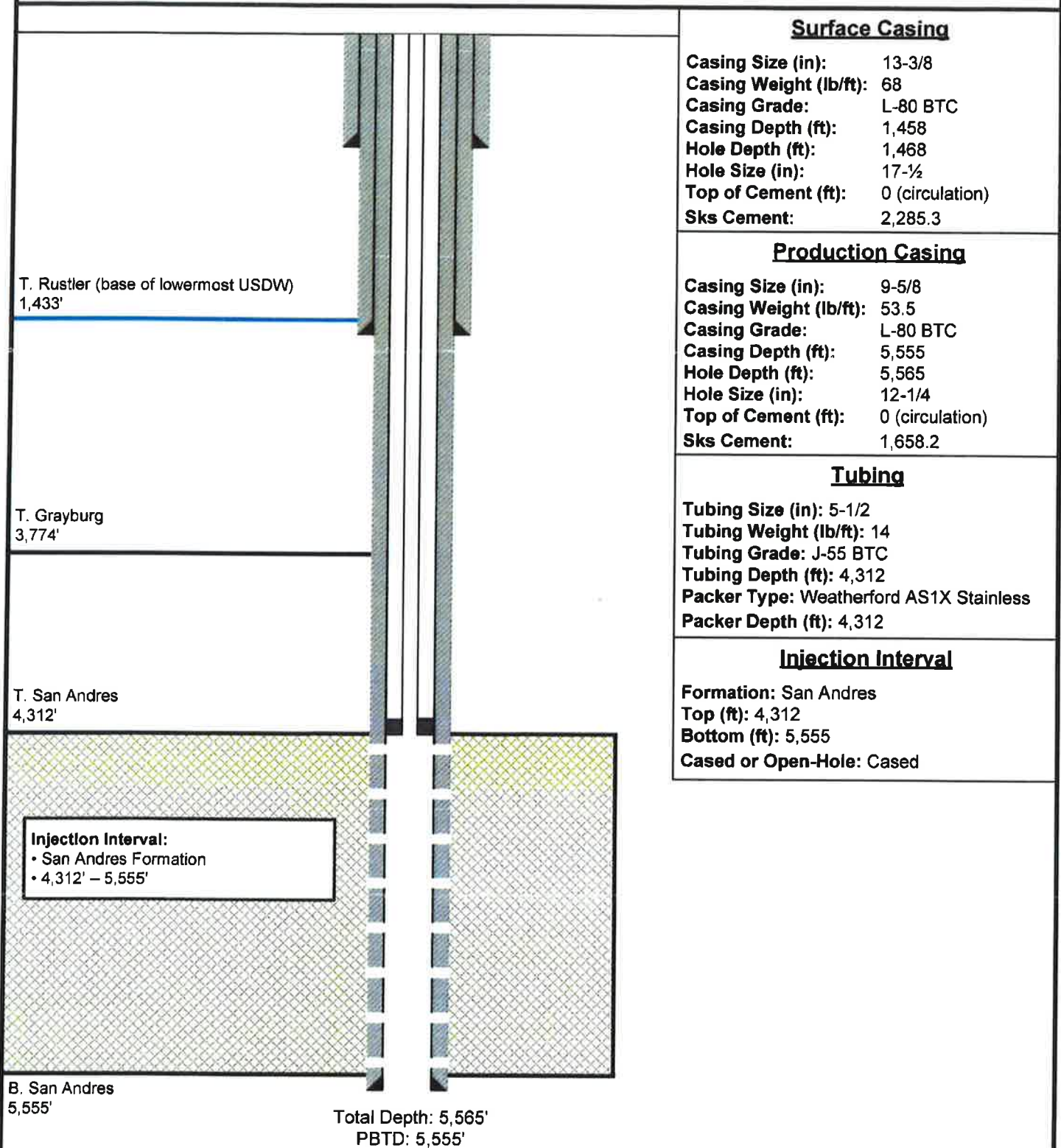
Geologic Description of Injection Interval - The proposed injection interval is located in the San Andres formation between the depths of 4,312 and 5,555 feet. The San Andres formation consists of an interbedded carbonate sequence composed of limestone and dolomite. These cycles tend to be mappable within 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)

Pilot Water Solutions SWD LLC

O'Brien SWD State #1 Wellbore Diagram



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

NOT TO SCALE

(Attachment to NMOCD Form C-108, Application for Authority to Inject.)



(Attachment to NMOCD Form C-108, Application for Authority to Inject.)



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

Action 270597

CONDITIONS

Operator: Pilot Water Solutions SWD LLC 20 Greenway Plaza, Suite 200 Houston, TX 77046	OGRID: 331374
	Action Number: 270597
	Action Type: [IM-SD] Admin Order Support Doc (ENG) (IM-AAO)

CONDITIONS

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