### STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

# APPLICATION OF SPUR ENERGY PARTNERS LLC FOR APPROVAL OF A PRESSURE MAINTENANCE PROJECT, EDDY COUNTY, NEW MEXICO.

CASE NO. 24042

### NOTICE OF SECOND SUPPLEMENTAL STATEMENT OF GEORGE A. WATERS

Spur Energy Partners LLC ("Spur") (OGRID No. 328947), the applicant in the above-referenced case, submits this notice of filing of a second supplemental statement from Spur's engineering witness George A. Waters. Mr. Waters updates his supplemental statement to request a reduction in the proposed maximum and average injection rates from 10,000 MCF/day and 5,000 MCF/day to 7,000 MCF/day and 3,000 MCF/day, respectively.

Spur respectfully requests that the attached second supplemental statement be accepted for filing and made part of the record of this case.

Respectfully submitted,

### HOLLAND & HART LLP

By: 🤇

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# ATTORNEYS FOR SPUR ENERGY PARTNERS LLC

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### SELF-AFFIRMED SECOND SUPPLEMENTAL STATEMENT OF GEORGE A. WATERS

 My name is George Armstrong Waters. I work for Spur Energy Partners LLC ("Spur") as an Operations Manager.

2. I have testified before the New Mexico Oil Conservation Division as an expert witness in petroleum engineering in this matter and my credentials as an expert have been accepted by the Division and made a matter of record.

3. I am submitting this second supplemental statement to modify Spur's requested rate of injection in consideration of the reservoir simulation results recently submitted to the Division

#### as <u>Spur Exhibit I</u>.

4. Based on the model simulation, Spur seeks to modify its request to limit its maximum authorized injection rate to 7,000 MCF/day with an estimated average injection rate of 3,000 MCF/day, instead of a maximum of 10,000 MCF/day with an average injection rate of 5,000 MCF/day, as requested in the application.

5. The proposed reduction in the maximum and average injection rates will give Spur the necessary flexibility to operate injection at rates within a range supported by the model while staying below the maximum proposed surface injection pressure of 1,077 psi.

6. While the proposed maximum surface injection pressure serves as the ultimate injection safety factor and limit, Spur recognizes a reduction in the requested maximum and average injection rates is appropriate to better align with the reservoir simulation.

7. In addition, Spur understands that the Division is contemplating requiring installation of a subsurface safety valve in the proposed injection well as a condition of approval. While Spur does not believe it is necessary, it is willing to accept installation of a subsurface safety valve as a condition of approval for the project.

8. It remains my opinion that granting this application will help conserve resources and will avoid waste and protect correlative rights.

9. I affirm under penalty of perjury under the laws of the State of New Mexico that the foregoing statements are true and correct. I understand that this self-affirmed statement will be used as written testimony in this case. This statement is made on the date next to my signature.

George A. Waters

4/16/2024 Date