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

APPLICATION OF RAZ OIL AND GAS L.L.C. TO APPROVE SALT WATER DISPOSAL WELL IN LEA COUNTY, NEW MEXICO.

**CASE NO. 25081** 

#### REVISED EXHIBIT PACKET TABLE OF CONTENTS\*

Exhibit A: Self-Affirmed Declaration of Joshua Ticknor

- Exhibit A-1: Resume
- Exhibit A-2: Application in Case No. 25081
- Exhibit A-3: Revised C-108, including revised Wellbore Diagram
- Exhibit A-4: YO State #1 SWD Volumetrics Analysis
- Exhibit A-5: Updated ½ Mile Area of Review Map
- Exhibit A-6: Economics Analysis
- Exhibit A-7: Cardinal Water Report for Water Well CP00587

#### Exhibit B: Self-Affirmed Declaration of Thomas E. Tomastik

- Exhibit B-1: OCD Delaware Mountain Group Map
- Exhibit B-2: Proposed Conditions of Approval

#### Exhibit C: Self-Affirmed Declaration of Reed Davis

• Exhibit C-1: Revised Geology and Seismic Statement

#### Exhibit D: Self-Affirmed Declaration of Deana M. Bennett

- Exhibit D-1: Notice Letter Dated December 16, 2024
- Exhibit D-2: Mailing List
- Exhibit D-3: Certified Pro Tracking Information
- Exhibit D-4: Affidavit of Publication published on December 19, 2024

<sup>\*</sup> Revised and/or new exhibits (as requested by Division) denoted by italics

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

APPLICATION OF RAZ OIL AND GAS L.L.C. TO APPROVE SALT WATER DISPOSAL WELL IN LEA COUNTY, NEW MEXICO.

**CASE NO. 25081** 

#### SELF-AFFIRMED DECLARATION OF JOSHUA TICKNOR

Joshua Ticknor declares as follows:

- 1. My name is Joshua Ticknor. I work for ALL Consulting as a Project Manager/Regulatory Specialist. I have been retained by Raz Oil and Gas L.L.C. ("Raz") (OGRID No. 370507). My responsibilities at ALL Consulting include saltwater disposal well permitting efforts in New Mexico. I have personal knowledge of the matters stated herein.
- 2. I have not previously testified before the Division. My resume is attached as **Exhibit A-1**. I received a Bachelor's Degree in Petroleum Engineering from the University of Tulsa, in 2008. Since that time, I have spent more than 15 years supporting oil and gas exploration and production operations, including designing disposal facilities for water produced in the oil and gas production process. I also have experience with reservoir modeling. I am a registered professional engineer in New Mexico, as well as Oklahoma, Texas, and Wyoming. I have supervised the assembly and submission of multiple produced water injection applications submitted to the New Mexico Oil Conservation Division.
- 3. I request to be admitted as an expert in saltwater disposal well operations, engineering, and permitting matters.
  - 4. My area of responsibility includes the area of Lea County in New Mexico.
- 5. I am familiar with the application Raz filed in this matter and I am familiar with the status of the lands in the subject area.

- 6. **Exhibit A-2** is the hearing application in Case No. 25081 that Raz filed with the Division. The application includes the Form C-108, attached as Exhibit A to the Application. In preparing for this hearing, I have reviewed the C-108 and did not identify any changes that require amending the C-108 or affect the accuracy of statements in the C-108, other than the changes I will discuss below that Raz has agreed to as a result of discussions with Mewbourne Oil Company ("Mewbourne").
- 7. Raz currently operates the YO State SWD #1 (API 30-025-38162) (the "Well") pursuant to Division Order SWD-1594, at a surface location 660' from the North line and 840' from the West line, Lot D, Section 15, Township 21 South, Range 35 East, NMPM, Lea County, New Mexico. Raz currently injects produced water into the Devonian formation. The well is a commercial well.
- 8. In this case, Raz seeks authority to plug back the Well to the Delaware Mountain Group ("DMG") and authority to inject produced water into the Bell Canyon and Cherry Canyon formations.
- 9. Raz is applying to plug back the Well to allow disposal into the Bell Canyon and Cherry Canyon formations because current disposal into the Devonian formation has become nonviable. Injection pressures have increased to near the maximum allowable limit, making continued operations in the Devonian formation uneconomic. By plugging back and recompleting into the Bell Canyon and Cherry Canyon formations, Raz aims to maintain viability by utilizing a shallower and potentially more efficient disposal zone that could accommodate its operational needs.

- 10. In its C-108 and application in this case, Raz originally sought authority to inject at a depth of approximately 5,540 feet to 6,930 feet, and requested that the Division approve a maximum daily injection rate for the well of 20,000 barrels of water per day ("bwpd").
  - 11. Mewbourne objected to Raz's application in this case on January 3, 2025.
- 12. Raz and Mewbourne engaged in discussions to resolve Mewbourne's objections, and, as a result of those discussions, Raz agreed to limit the injection interval to 5,540 feet to 6,104 feet and to limit the maximum requested injection volume to 8000 bwpd. Attached as **Exhibit A-**3 is a revised wellbore diagram showing the revised injection interval.
- 13. Raz and Mewbourne have also coordinated with the New Mexico State Land Office and the New Mexico State Land Office does not have any objections to recompleting the Well in the DMG based on the revised injection interval and injection volumes.
- 14. Raz requests that the 8000 bwpd be specified in the Special Conditions section of the approved permit.
  - 15. The outside diameter of the injection tubing will be 4.5 inches.
  - 16. Raz requests approval of a maximum injection pressure of 1,108 psi for the well.
- 17. Raz calculated the maximum injection pressure using the Division 0.2 PSI per foot of depth to top perforation  $(0.2 \times 5540)$ .
- 18. Raz understands that the Division may require Raz to undertake a step-rate test ("SRT") prior to commencing injection to determine the surface injection pressure and the corresponding rate of injection. If this Division imposes this requirement, Raz will undertake the SRT prior to commencing injection.
  - 19. Raz proposes to cement back the well as follows:
    - Set CIBP at 12,300' and spot 25 sacks Class H cement (approximately 122 feet of fill up) on top.

- Spot 200' Class H cement plug from 10,200'-10,000'.
- Spot 200' Class H cement plug from 7,678'-7,478'.
- Set CIBP at 7,100' and spot 25 sacks Class H cement (approximately 122 feet of fill up) on top.
- Perforate best zones based on open hole log suite, with top perforations at approximately 5,540'.
- 20. Raz intends to use the Hornet Packet, which is a specialized downhole tool used in injection wells to create an effective seal between the casing and tubing. It is designed to isolate specific zones in the wellbore, allowing for controlled injection into the desired formation while preventing fluid migration to unintended zones.
- 21. A summary of the Hornet Packer is included in the C-108 (Attachment 1, Exhibit A-2).
- 22. A map that identifies wells within 2 miles of the Well is included in the C-108 (Attachment 2, Exhibit A-2).
- 23. As noted on Attachment 2 to Exhibit A-2, there are no DMG disposal wells within 2 miles of the Well.
- 24. As noted on Attachment 2 to Exhibit A-2, there are no wells targeting the DMG within 2 miles of the Well. The closest DMG producer is 12.5-miles SW (API # 025-32937). There is a plugged oil well (025-35108) that is 2.29-miles due west.
- 25. I prepared an analysis of the potential for injected fluids to impact the closest DMG producer and the nearest DMG plugged well and my analysis concludes that the injected flued would not reach the nearest DMG producer or plugged DMG well. My analysis of the YO State #1 SWD Volumetrics is attached as **Exhibit A-4**.
- 26. As noted in Attachment 2 to Exhibit A-2, there is one well within a half-mile of the Well, which is the State WE K #001 well, operated by Raz, which has been plugged. Attachment

2 to Exhibit A-2 includes the plugging information and a wellbore diagram showing how the well was plugged.

- 27. Attachment 2 to Exhibit A-2 identifies the operators, lessees, mineral and surface owners within two miles of the Well.
- 28. ALL Consulting reviewed publicly available data on OCD's website to determine whether there are any gas processing facilities that are currently approved for disposal of treated acid gas in the DMG and did not find any within 3 miles of the Well.
- 29. I also reviewed whether there are any fresh water wells within a mile of the Well. I found one freshwater well within one mile of the Well, as noted in Attachment 5 to Exhibit A-2. I have also included the well data from that well, undertaken in 2015.
- 30. The Lamar Limestone and the Brushy Canyon will not be used for injection and are not part of the proposed injection interval.
- 31. Raz will not using well stimulation that induces any new fracture systems or propagates existing fractures and Raz will not use any propagates in stimulation.
- 32. Raz understands that the Division may require additional testing and reporting, which Raz is prepared to undertake and submit.
- 33. I provided notice information to Raz's counsel based on OCD's regulations, in Rule 19.15.26.8(B), which require notice to the surface owner and to each leasehold operator, and to any other affected person as that term is defined Rule 19.15.2.7(8). The notice party information is included in Attachment 7 to Exhibit A-2.
- 34. I reviewed the notice party information prior to submitting the application for this case and found one change, which is that Tom Brown Incorporate leased to Winston & Marshall.

I provided Winston & Marshall's contact information to Raz's counsel for notice purposes.

Attached as Exhibit A-5 to my declaration is an updated ½ mile AOR map.

- 35. It is my opinion that Raz undertook a good faith effort to locate and identify the correct parties and valid addresses required for notice.
- 36. In my opinion, the granting of Raz's application is in the interests of conservation and the prevention of waste. The Well will provide much needed capacity for produced water, which will, in turn, support oil and gas operators' ability to produce oil and gas.
- 37. The attached exhibits were prepared by me, or compiled from company business records, or were prepared at my direction.
- 38. I attest under penalty of perjury under the laws of the State of New Mexico that the information provided herein is correct and complete to the best of my knowledge and belief.

[Signature page follows]

Dated: February 6, 2025

Josh Ticknor

Joshua Ticknor

January 2025



# Joshua David Ticknor P.E., Q.M.S Project Petroleum Engineer Registered Professional Engineer in OK, TX, NM, & WY

#### Education

B.S., Petroleum Engineer, University of Tulsa

#### **Distinguishing Qualifications**

Mr. Ticknor obtained a bachelor's degree in petroleum engineering and since then has gained versatile experience through more than 15 years of supporting exploration and production operations, coordinating reservoir engineering teams, and designing wastewater management, recycling, and disposal facilities.

Mr. Ticknor has proven his ability to manage all aspects of well interventions safely and efficiently, recently concentrating on abandonment of complex and challenging wells. His experience includes development and implementation of detailed procedures for well abandonment operations and supervising extensive research efforts on the best practice considerations for idle and orphan well plugging and abandonment. Mr. Ticknor has provided on-site supervision and coordination of well service rigs during abandonment operations, effectively managing wellbore integrity, fluid handling, pressure control, and safety throughout the task.

Mr. Ticknor's varied experience includes analysis and resolution of other operational and multi- disciplinary issues in the areas of well construction and siting; well permitting; contractor management; water sourcing, and pipeline modeling. This includes experience in produced water storage, treatment, transportation, and disposal. He is highly knowledgeable in many areas and aspects of workover operations not limited to flowback maintenance, gas lift optimization, and marginal well management.

Mr. Ticknor is also proficient in utilizing advanced software tools for reservoir modeling, economic forecasting, and project scheduling. His hands-on experience with technologies like aerial drone surveillance, mechanical integrity testing, and pressure transient analysis further bolsters his ability to handle complex engineering projects.

Mr. Ticknor is a registered professional engineer in Oklahoma, Texas, New Mexico, and Wyoming. In December 2023, he earned the Qualified Methane Specialist (QMS) certification through a40-hour course administered by the WellDone Foundation.





#### Relevant Experience

The following information is intended to demonstrate Mr. Ticknor's experience and qualifications:

For **Promise Energy**, Mr. Ticknor developed abandonment proposals and evaluated carbon credit potential for neglected wells in the South Gillock Unit near Texas City. Many of these wells were situated near residential areas and water channels, highlighting the need for environmental risk mitigation. The project focused on prioritizing the plugging of wells with a high risk of contamination while aligning efforts with carbon credit generation strategies to ensure sustainable outcomes. Led engineering efforts for the project, including drafting and reviewing wellbore diagrams (WBDs), creating detailed abandonment plans, and providing oversight of well plugging operations. Ensured compliance with regulatory standards and incorporated best practices for minimizing environmental impact and optimizing cost efficiency."

For Landowners near Boehmer Lake, Mr. Ticknor conducted a comprehensive review of well files and operator records for aging and abandoned wells near Boehmer Lake, an artificial lake in Pecos County, Texas, created by a leaking well. The surrounding area is characterized by extensive legacy oilfield infrastructure and complex subsurface geology, which pose significant challenges for well integrity. Assessed potential pathways for crossflow by analyzing historical data, well construction, and plugging records. Provided detailed recommendations to mitigate environmental risks, address regulatory compliance, and improve site management strategies. Provided insights and recommendations to mitigate environmental impacts and enforce regulatory compliance.

For owners of the **Petty Ranch near Pecos**, **Texas**, Mr. Ticknor conducted an air quality study to investigate emissions from a nearby gas plant suspected of exceeding regulatory limits. Collected and analyzed atmospheric data, monitored emissions, and identified non-compliance with air quality standards. Developed evidence-based reports and figures supporting claims of environmental impact, aiding the ranch owner in addressing the issue with regulators and stakeholders.

For **Dynavert**, Mr. Ticknor evaluated recently abandoned and idle wells near Garden City, Kansas for their potential to generate carbon credits through plugging and reclamation activities. Conducted site assessments, reviewed regulatory frameworks, and analyzed environmental benefits to quantify carbon offset potential. Provided recommendations to optimize credit generation while addressing environmental and compliance goals.

Page | 2 Joshua Ticknor P.E., Q.M.S.



For **Charm Industrial**, Mr. Ticknor prepared a study assessing the feasibility of utilizing corn stover as a feedstock for biodiesel production and generating carbon credits. Analyzed supply chain logistics, conversion processes, and regulatory frameworks to evaluate economic viability and environmental impact. Provided actionable recommendations for integrating corn stover into sustainable energy and carbon offset initiatives.

For **Denali Resources**, Mr. Ticknor evaluated the potential of deep Arbuckle natural gas production wells in Latimer County for conversion to Class VI carbon dioxide disposal wells. Analyzed reservoir properties, geological suitability, and well construction to determine feasibility. Provided recommendations and detailed assessments to support decision-making for  $CO_2$  sequestration operations.

Litigation Support – Saltwater Disposal and Production Operations Dispute Mr. Ticknor provided litigation support in a dispute involving a saltwater disposal operator and production operators alleging interference with nearby drilling activities in the Permian Basin. He conducted volumetric analysis, reviewed injection pressure data, and assessed subsurface interactions. His work included developing detailed, evidence-based figures and reports that demonstrated the disposal operations were not the cause of the claimed issues.

For Litigation Support, Mr. conducted a Frac Hit Investigation for Damaged Vertical Wells in Cleveland County Oklahoma. Mr. Ticknor investigated frac hit damage on vertical wells caused by nearby horizontal drilling operations. Analyzed pressure data, well performance, and geological factors to assess the extent of the impact. Provided detailed reports and evidence-based figures to support the affected operator in addressing the issue with stakeholders and regulators.

For Litigation Support, Mr. Ticknor conducted an Analysis of a Saltwater Purge in Latimer County Oklahoma. The saltwater purge incident initially was attributed to a saltwater disposal operator. Collected and analyzed on-site pressure and flow data over 18 months, identifying evidence suggesting nearby production wells as the potential cause. Developed data-driven figures and reports to support the defense, aiding in case strategy and resolution.

For **Shareholder Litigation Support Against Concho Resources**, Mr. Ticknor provided technical support in a shareholder case involving Concho Resources' Dominator pad in the Permian Basin. Conducted in-depth reviews of production forecasts, reserve estimates, and marketing strategies. Analyzed evidence and developed figures to support the case.

Page | 3 Joshua Ticknor P.E., Q.M.S.



highlighting discrepancies in production and reserve reporting.

For Raz Oil and Gas, Mr. Ticknor coordinated the abandonment of an idle deep disposal well drilled on New Mexico State Land in Lea county. This project necessitated complex plugging requirements as the operator of the idle disposal well proposed that the final disposition of the abandonment would allow for future up-hole recompletion of their other nearby SWD properties, Mr. Ticknor prepared a well abandonment procedure, specifying the steps to be taken to abandon the idle disposal well in a safe and environmentally responsible manner. The procedure was developed in consultation with all relevant stakeholders, including engineers, regulators, and environmental experts. Mr. Ticknor procured the vendors and service providers needed to carry out the abandonment. Mr. Ticknor provided on-site supervision of all abandonment activities to ensure that the procedure was followed correctly and that all regulations were met.

For the **Groundwater Protection Council**, Mr. Ticknor served as the project manager for an extensive research effort on best practice considerations for idle and orphan well plugging and abandonment. Mr. Ticknor led a team of authors to investigate oil and gas well abandonment technologies, methods, and regulations from historic to modern day practices. The team conducted a comprehensive review of state and federal plugging requirements, which were summarized in the document. Mr. Ticknor was responsible for developing a research plan and timeline, overseeing the data collection and analysis, facilitating collaboration among researchers, managing the budget and resources, and ensuring that all deadlines were met. Mr. Ticknor also played a key role in writing the research paper, which included summarizing the findings of our research, discussing the implications for industry and regulators, and recommending areas for future research.

For a **confidential client**, Mr. Ticknor prepared an expert witness report for a blowout that occurred during the reabandonment of an oil well in Marina del Rey, California. The expert report was based on Mr. Ticknor's review of the well's history, the accident investigation report, and his own expertise in oil and gas well abandonment. The document discussed the causes of the blowout and the steps that could have been taken by the contracted well service providers to prevent the incident from happening. The expert witness report was used in the litigation that followed the blowout.

For **Empire Disposal Solutions**, Mr. Ticknor was critically involved in the planning, design, drilling and completion of two Class II Non-Hazardous Saltwater Disposal wells in Belmont, Ohio. This project included all aspects of the well development process, including AFE development, contractor coordination, drilling, cementing, geophysical logging, mechanical integrity testing, injectivity testing. During the drilling of the wells, Mr. Ticknor was

Page | 4 Joshua Ticknor P.E., Q.M.S.



responsible for assisting in the oversight of the drilling of the well, cementing of the well, logging of the well, onsite safety, and demobilization of the rig.

For Deep Rock Disposal Solutions, Scout Energy, Spur Energy, Anthem Water Solutions, LLC, Blackbuck Resources, Goodnight Midstream, Lilystream Water Solutions, LLC, Marathon Oil EF., Overflow Energy, Probity SWD, LLC, Select Energy Service, Solaris Water Midstream, LLC, Waterbridge Stateline, LLC, and Vista Disposal Solutions, Mr. Ticknor has supervised the assembly and submission of multiple Drilling Applications in both Texas and New Mexico (on state and private land), over 100 Injections Application for the New Mexico Oil Conservation Division and multiple injection applications for the Texas Rail Road Commission (RRC). Mr. Ticknor's role in the permitting process was as follows:

- Area of Review (TX & NM) Mr. Ticknor assisted in the evaluation of all wells within the state required area of review (AOR) and assembling tables to summarize the review findings. The review consisted of analysis productive formations, well data, well logs, offset operators, and surface owners of wells within the state required radiuses.
- Drilling Application (C-101) (NM) reviewed the proposed drilling programs and
  compiled the drilling applications for numerous saltwater disposal wells. Mr. Ticknor's
  role was to ensure that the proposed drilling and casing plan followed state regulation,
  and then to compile and submit the drilling applications in accordance with the New
  Mexico Oil Conservation Division regulation.
- **Geologic Evaluation (NM &TX)** Mr. Ticknor assisted in the evaluation of faults, seismic activity, and formation characteristics within the area of review. He also constructed documents showing the proximity of faults and most recent seismic activity to the proposed injection well. These documents were used to demonstrate the lack of hydrologic connection between the freshwater formations and the proposed injection zone.
- Injection Application (C-108) (NM) compiled applications in accordance with the New Mexico Oil Conservation Division regulation, including supplemental well information; area of review; well bore diagram; injection formation, source water and freshwater well sampling results; seismicity assessments; operator information; surface, and mineral owner contact information; and public notice affidavits.
- Public Notice (NM & TX) Mr. Ticknor created several letters to be sent to local newspapers for the purpose of notifying local residents, landowners, and operators of the proposed saltwater disposal wells in the area.
- Water Well Analysis (NM) Conducted a multiple reviews of state water well

Page | 5 Joshua Ticknor P.E., Q.M.S.



records to determine what water wells within an AOR could meet the regulatory requirements for sampling. Mr. Ticknor contacted water well owners to confirm the status of each well and obtain permission for sampling (if required). Once complete, he creates a detailed table outlining the water well eligibility for sampling, location, status, and contact information.

- Water Well Sampling (NM) Mr. Ticknor has both conducted and coordinated sampling of water well in accordance with New Mexico state regulations.
- Surveying (NM & TX) Mr. Ticknor has assisted in the review of proposed SWD location and coordinated surveying of viable SWD locations. Once the surveys are completed, Mr. Ticknor reviews the completed C-102 plats to ensure that each plate is accurate and complete with state regulations.
- Task Management Mr. Ticknor has assisted in the project management by assigning sub- tasks to team members, reviewing completed portions of the project, tracking project progress, communication problems with the project manager, and preparing project updates for the client.
- Application Audit Mr. Ticknor has assisted in the audit of application completed by
  either operators or third-party consultants. During the audit Mr. Ticknor identifies areas
  where the application is not administratively complete per NMOCD requirements,
  presents inconsistent data, or does not comply with New Mexico regulations.
- **Ground Water Determination (GW-1)** Mr. Ticknor compiled well logs, survey information, and W-14 Injections into a non-productive formation application form in order to receive a determination of the depth of usable quality water which must be protected within the proposed well location.
- Application to Inject into a Non-Productive Formation (W-14) (TX) Mr. Ticknor compiled several applications in accordance with the Texas Railroad Commission regulation, including area of review; historic production reviews; well bore diagrams; groundwater determinations; no-harm letters; seismicity assessments; certificates of notice; and public notice affidavits.

For multiple confidential clients, Mr. Ticknor is involved in the permitting and drilling of Class I Non-Hazardous Waste Disposal Wells in Converse and Campbell County, Wyoming. He has coordinated with state regulators on many aspects of the process and has developed technical documents and procedures for step rate testing, formation stimulation, mechanical integrity testing, and pressure transient analysis. Mr. Ticknor

Page | 6 Joshua Ticknor P.E., Q.M.S.



conducted formation water testing in association with a Wyoming SWD Permit. In addition to the formation water sampling, Mr. Ticknor completed aerial drone surveillance of the 5-mile Area of Review (AOR) around the permitted SWD well. Mr. Ticknor also completed aerial drone surveys of multiple proposed facility locations, to assist in determining the feasibility of the proposed locations.

For **Southwind Oil and Gas**, Mr. Ticknor was critically involved in the planning, design, drilling and completion of a Saltwater Disposal well in Louisiana. This project included all aspects of the well development process, including AFE development, contractor coordination, drilling, cementing, geophysical logging, mechanical integrity testing, injectivity testing. During the drilling of the SWD well, Mr. Ticknor was responsible for assisting in the oversight of the drilling of the well, cementing of the well, logging of the well, onsite safety, and demobilization of the rig. During the permitting of Southwind's Texas SWD, Mr. Ticknor was responsible for assisting in the review of the completed SWD application.

For a confidential client, Mr. Ticknor developed an Expert Report discussing potential health risks associated with Unconventional Natural Gas (UNG) development occurring near populated areas providing a thorough review of the relationships between potential nuisance sources, oil and gas development processes, and the associated hazards that may lead to human exposure and possible health effects.

For **multiple clients in the Permian Basin**, Mr. Ticknor has worked with the Texas Railroad Commission and The New Mexico Oil Conservation District in developing drilling and injection permit applications. He has coordinated with state regulators on many aspects of the process and has developed technical documents including siting, design, geology, wellbore diagrams, and emplaced waste calculations.

For **Fairway Resources**, Mr. Ticknor was part of a team tasked with providing water for oil & gas development operations in Major County, Oklahoma. For this project, ALL Consulting has assessed options to transport fresh water via pipeline to Fairway's development area, these impoundments will then be used to supply water on a rapid basis for completion operations. ALL Consulting also has evaluated the potential of Brackish Groundwater supply from the Hennessey Group (a Groundwater aquifer system).

For **Alta Mesa**, Mr. Ticknor serves as a team member helping to develop a large water infrastructure project in Kingfisher County, Oklahoma. The project includes planning, design, construction, and operation of water infrastructure for approximately 100,000 acres that are being developed by Alta Mesa. This includes in excess of 100 miles of water

Page | 7 Joshua Ticknor P.E., Q.M.S.



pipeline, water access from the Cimarron River, multiple water impoundments, various pumps, manifolds, and various other components. The project is being done on a full design-build (or Turnkey) basis with an overall budget of approximately \$100 million.

For **Primexx Energy Partners Ltd.**, & Halcon Resources, Mr. Ticknor assisted with the construction management of water and gas pipelines, water impoundments, treatment tank batteries, roadways, and a gas plant. During construction management, Mr. Ticknor was responsible for ensuring the technical specifications were met, job safety analysis was performed daily, 811 underground clearance calls were placed and cleared, and progress reports were generated daily. The development of this water transfer infrastructure is to facilitate the treatment and movement of limited water resources so drilling and hydraulic fracturing can be performed across this arid environment. In addition to construction management, Mr. Ticknor assisted in the preparation of an Operation and Maintenance Plan for a small exempt dam in west Texas. These plans are required by the TCEQ once an exception has been awarded.

From 2013 to 2016, Mr. Ticknor worked as an Operations Engineer at Newfield Exploration where he supported production operations for newly drilled horizontal wells in the Woodford formation and vertical wells drilled in the Hunton and Viola formations for the SCOOP play near Blanchard, Oklahoma. This work included maintaining initial flowback wells received just after completion; designing and coordinating facility construction; performing biannual marginal economic well reviews; leading weekly meetings with field foremen, superintendents, and management; maintaining workover rig schedules; and preparing AFE packages for review and approval by management and partners.

While at Newfield, Mr. Ticknor served with Newfield's Mid-Continent Water Operations Team, whose task involved the procurement, transportation, storage, recycling, and disposal of fresh and produced water. During that period Mr. Ticknor, developed economics for saltwater disposal well development in Kingfisher Co, Oklahoma. He also maintained several resourcing and forecasting Spotfire projects for weekly scheduling and was crucially involved in produced water recycling facility design and review.

Also, while with Newfield, Mr. Ticknor was involved in production operations for horizontal and vertical wells drilled in the Granite Wash and Red Fork Formations in Wheeler County, Texas. He was active in gas lift optimization and many redesigns on long vertical perforated intervals. He was also involved in high pressure gas lift pipeline planning and construction and wrote workover procedures for various projects such as fishing, gas Lift, and plungers. Some projects of note include repairing Brown Dolomite Casing leaks, Deadstring/Capstring BHA retrieval operations, and installing and optimizing gas lift

Page | 8 Joshua Ticknor P.E., Q.M.S.



assisted plungers.

From 2011 to 2013, Mr. Ticknor worked for Petrohawk/BHP Billiton as a reservoir engineer for the Haynesville Production Unit. While there, he was responsible for providing reservoir engineering input and support to development and planning teams responsible for the Haynesville Production Unit. Mr. Ticknor also delivered reserve estimates for quarterly and annual review and helped develop performance type curves for production forecasting for shale gas wells. He was involved in estimating the impacts of well interference from full-scale field development on existing and planned wells, which led to an in-house methodology that provided appropriate well spacing to planning and drilling that could be used for future development. Other notable projects and skills include pressure management through restricted rate production, reservoir modeling technique and software comparison, updated reservoir quality maps and developed gas quality maps

From 2009 to 2011, Mr. Ticknor worked for ALL Consulting. While there, Mr. Ticknor worked with The Texas Railroad Commission and the Texas Commission on Environmental Quality on Class I&II UIC applications in Texas. He also worked with EPA on Class II UIC applications in California. He was also tasked with developing injection well histories and proposed possible actions to increase injection capacity and reviewed submitted bids for best options for s saltwater disposal operation in Louisiana. Mr. Ticknor also provided onsite coordination during the drilling, completion, and installation of injection well facilities in Fort Worth, Texas. Mr. Ticknor also helped to develop a traffic impact study for a water disposal facility in Bradford County, Pennsylvania, and help perform an economic impact study using IMPLAN software for Marcellus development in West Virginia. He has also aided in developing Stormwater Pollution Prevention Plans (SWPPP) and National Pollutant Discharge Elimination System (NPDES) permits for various oil and gas facilities in Oklahoma, Louisiana, and Pennsylvania. Other work included performing injectivity analysis determining permeability and skin influence for several annual injection well mechanical integrity tests along with reservoir modeling including expected pressure increase, zone of endangering influence, and determination of lowermost underground source of drinking water for injection well permit applications. Mr. Ticknor has also aided in preparing research for papers on several topics including water sourcing, produced water treatment, visual/noise impact, induced seismicity, and methane migration.

> Page | 9 Joshua Ticknor P.E., Q.M.S.



#### **Professional Organizations**

Society of Petroleum Engineers

#### Short Courses, Continuing Education, and Certifications

Qualified Methane Specialist

Well Control Training (Various Courses)

National Incident Command System (Various Courses)

**HAZWOPER** (Various Courses)

CPR, AED, First Aid, and Blood borne Pathogens (Various

Courses) Safeland and Basic Safety Awareness Orientation

(Various Courses) H2S Awareness (Various Courses)

IADC BOP Training (Various Courses)

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

APPLICATION OF RAZ OIL AND GAS L.L.C. TO APPROVE SALT WATER DISPOSAL WELL IN LEA COUNTY, NEW MEXICO.

#### **APPLICATION**

Raz Oil and Gas L.L.C. ("Raz"), OGRID No. 370507, through its undersigned attorneys, hereby submits this application to the Oil Conservation Division pursuant to the provisions of NMSA 1978, § 70-2-12, Rule No. 19.15.26, and Rule 19.15.4.8 for an order authorizing Raz to plug back the YO State SWD #1 well to the Delaware Mountain Group and authorizing injection from the YO State SWD #1 well into the Delaware Mountain Group. In support of this application, Raz states as follows:

- (1) Raz currently operates the YO State SWD #1 (API 30-025-38162) pursuant to Division Order SWD-1594, at a surface location 660' from the North line and 840' from the West line, Lot D, Section 15, Township 21 South, Range 35 East, NMPM, Lea County, New Mexico. Raz currently injects produced water into the Devonian formation.
- (2) Raz seeks authority to plug back the YO State SWD #1 well to the Delaware Mountain Group and authority to inject produced water into the Delaware Mountain Group at a depth of approximately 5,540 feet to 6,930 feet.
- (3) Raz requests that the Division approve a maximum daily injection rate for the well of 20,000 bbls per day.
  - (4) Raz requests approval of a maximum injection pressure of 1,108 psi for the well.



Page 2 of 40

Received by OCD: 12/10/2024 2:38:31 PM

(5)A proposed C-108 for the subject well is attached hereto as Attachment A. Raz

previously submitted a C-108 for administrative approval in October 2023. Raz reviewed the C-

108 in preparation for submitting this application and made one revision to the ownership map—

otherwise the C-108 as submitted in October 2023 required no changes and is still accurate.

(6)Notice of the previously submitted administrative application was given as shown

in the attached C-108. Counsel for Raz will provide notice of this hearing application as required

by the Division's regulations.

(7)The granting of this application will prevent waste and will protect correlative

rights.

WHEREFORE, Raz requests that this application be set for hearing before an Examiner of

the Oil Conservation Division on January 9, 2025; and that after notice and hearing, the Division

enter its order approving this application.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS

& SISK, P.A.

By: Meina M. Bennett

Earl E. DeBrine, Jr.

Deana M. Bennett

Yarithza Peña

Post Office Box 2168

500 Fourth Street NW, Suite 1000

Albuquerque, New Mexico 87103-2168

Telephone: 505.848.1800

edebrine@modrall.com

deana.bennett@modrall.com

yarithza.pena@modrall.com

Attorneys for Applicant

Received by OCD: 12/10/2024 2:38:31 PM

Page 3 of 40

CASE NO. 25081: Application of Raz Oil and Gas L.L.C. for approval of a salt water disposal well in Lea County, New Mexico. Applicant seeks an order authorizing applicant to plug back the YO State SWD #1 well to the Delaware Mountain Group and authorizing applicant to inject produced water into the Delaware Mountain Group at a depth of approximate 5,540 feet to 6,930 feet. Applicant currently operates the YO State SWD #1 (API 30-025-38162), at a surface location 660' from the North line and 840' from the West line, Lot D, Section 15, Township 21 South, Range 35 East, NMPM, Lea County, New Mexico. Applicant further requests that the Division approve a maximum daily injection rate for the well of 20,000 bbls per day. Said area is located approximately 12.24 miles northwest of Eunice, New Mexico.

RECEIVED:	REVIEWER:	TYPE:	APP NO:	
	- Geolog	ABOVE THIS TABLE FOR OCD  CO OIL CONSERV  ical & Engineerin francis Drive, San	<b>/ATION DIVISION</b> g Bureau –	
	ADMINIST	RATIVE APPLICAT	ION CHECKLIST	
THIS	CHECKLIST IS MANDATORY FOR A REGULATIONS WHICH F	ALL ADMINISTRATIVE APPLIC REQUIRE PROCESSING AT TH		
			OGF	RID Number:
۱۰ ما.			API:_ 	Code:
			IRED TO PROCESS	THE TYPE OF APPLICATION
A. Location	ICATION: Check thosen - Spacing Unit - Simu NSL \qquad \qquad \qquad \qquad \qquad \qquad \qquad \qqqqqqqqqqqqqqqqqqqqqqqqqqqqqqqqqqqq	Itaneous Dedication	on _	]SD
[	one only for [1] or [11] nmingling – Storage – N DHC DCTB DI ction – Disposal – Press WFX PMX DS	PLC ∐PC ∐( sure Increase – Enh	OLS OLM anced Oil Recov EOR PPR	ery FOR OCD ONLY
A. Offse B. Roya C. Appl D. Notifi E. Notifi F. Surfa G. For a	N REQUIRED TO: Check t operators or lease ho Ity, overriding royalty of cation requires publish cation and/or concurr cation and/or concurr ce owner Il of the above, proof of otice required	olders owners, revenue ov ned notice rent approval by S rent approval by B	wners LO LM	Notice Complete  Application Content Complete
administrative understand tl	<b>N</b> : I hereby certify that e approval is <b>accurate</b> nat <b>no action</b> will be ta are submitted to the D	and <b>complete</b> to aken on this applic	the best of my kr	
N	lote: Statement must be comp	leted by an individual wit	h managerial and/or su	pervisory capacity.
			Date	
Print or Type Name				
Josh Tickn	or		Phone Numbe	er
Signature			e-mail Address	<u> </u>

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

#### Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, New Mexico 87505

FORM C-108 Revised June 10, 2003

#### **APPLICATION FOR AUTHORIZATION TO INJECT**

I.	PURPOSE: Secondary Recovery Pressure Maintenance X Disposal Storage Application qualifies for administrative approval? Yes No
II.	OPERATOR: Raz Oil and Gas L.L.C.
	ADDRESS: P.O. Box 1180, Eunice, NM 88321
	CONTACT PARTY: Joshua Ticknor PHONE: (580) 916-2126
III.	WELL DATA: Complete the data required on the reverse side of this form for each well proposed for injection.  Additional sheets may be attached if necessary.
IV.	Is this an expansion of an existing project? Yes
V.	Attach a map that identifies all wells and leases within two miles of any proposed injection well with a one-half mile radius circle drawn around each proposed injection well. This circle identifies the well's area of review.
VI.	Attach a tabulation of data on all wells of public record within the area of review which penetrate the proposed injection zone. Such data shall include a description of each well's type, construction, date drilled, location, depth, record of completion, and a schematic of any plugged well illustrating all plugging detail.
VII.	Attach data on the proposed operation, including:
	<ol> <li>Proposed average and maximum daily rate and volume of fluids to be injected;</li> <li>Whether the system is open or closed;</li> <li>Proposed average and maximum injection pressure;</li> <li>Sources and an appropriate analysis of injection fluid and compatibility with the receiving formation if other than reinjected produced water; and,</li> <li>If injection is for disposal purposes into a zone not productive of oil or gas at or within one mile of the proposed well, attach a chemical analysis of the disposal zone formation water (may be measured or inferred from existing literature, studies, nearby wells, etc.).</li> </ol>
*VIII.	Attach appropriate geologic data on the injection zone including appropriate lithologic detail, geologic name, thickness, and depth Give the geologic name, and depth to bottom of all underground sources of drinking water (aquifers containing waters with total dissolved solids concentrations of 10,000 mg/l or less) overlying the proposed injection zone as well as any such sources known to be immediately underlying the injection interval.
IX.	Describe the proposed stimulation program, if any.
*X.	Attach appropriate logging and test data on the well. (If well logs have been filed with the Division, they need not be resubmitted)
*XI.	Attach a chemical analysis of fresh water from two or more fresh water wells (if available and producing) within one mile of any injection or disposal well showing location of wells and dates samples were taken.
XII.	Applicants for disposal wells must make an affirmative statement that they have examined available geologic and engineering data and find no evidence of open faults or any other hydrologic connection between the disposal zone and any underground sources of drinking water.
XIII.	Applicants must complete the "Proof of Notice" section on the reverse side of this form.
XIV.	Certification: I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.
	NAME: Joshua Ticknor TITLE: Consultant / Project Manager
	SIGNATURE:
*	E-MAIL ADDRESS: jticknor@all-llc.com  If the information required under Sections VI, VIII, X, and XI above has been previously submitted, it need not be resubmitted.  Please show the date and circumstances of the earlier submittal:

Side 2

#### III. WELL DATA

- A. The following well data must be submitted for each injection well covered by this application. The data must be both in tabular and schematic form and shall include:
  - (1) Lease name; Well No.; Location by Section, Township and Range; and footage location within the section.
  - (2) Each casing string used with its size, setting depth, sacks of cement used, hole size, top of cement, and how such top was determined.
  - (3) A description of the tubing to be used including its size, lining material, and setting depth.
  - (4) The name, model, and setting depth of the packer used or a description of any other seal system or assembly used.

Division District Offices have supplies of Well Data Sheets which may be used or which may be used as models for this purpose. Applicants for several identical wells may submit a "typical data sheet" rather than submitting the data for each well.

- B. The following must be submitted for each injection well covered by this application. All items must be addressed for the initial well. Responses for additional wells need be shown only when different. Information shown on schematics need not be repeated.
  - (1) The name of the injection formation and, if applicable, the field or pool name.
  - (2) The injection interval and whether it is perforated or open-hole.
  - (3) State if the well was drilled for injection or, if not, the original purpose of the well.
  - (4) Give the depths of any other perforated intervals and detail on the sacks of cement or bridge plugs used to seal off such perforations.
  - (5) Give the depth to and the name of the next higher and next lower oil or gas zone in the area of the well, if any.

#### XIV. PROOF OF NOTICE

All applicants must furnish proof that a copy of the application has been furnished, by certified or registered mail, to the owner of the surface of the land on which the well is to be located and to each leasehold operator within one-half mile of the well location.

Where an application is subject to administrative approval, a proof of publication must be submitted. Such proof shall consist of a copy of the legal advertisement which was published in the county in which the well is located. The contents of such advertisement must include:

- (1) The name, address, phone number, and contact party for the applicant;
- (2) The intended purpose of the injection well; with the exact location of single wells or the Section, Township, and Range location of multiple wells;
- (3) The formation name and depth with expected maximum injection rates and pressures; and,
- (4) A notation that interested parties must file objections or requests for hearing with the Oil Conservation Division, 1220 South St. Francis Dr., Santa Fe, New Mexico 87505, within 15 days.

NO ACTION WILL BE TAKEN ON THE APPLICATION UNTIL PROPER PROOF OF NOTICE HAS BEEN SUBMITTED.

NOTICE: Surface owners or offset operators must file any objections or requests for hearing of administrative applications within 15 days from the date this application was mailed to them.

#### **Application for Authorization to Inject**

Well Name: YO State SWD #1

**API**: 30-025-38162

#### III - Well Data (The Wellbore Diagram is included as Attachment 1)

A.

#### (1) General Well Information:

Operator: Raz Oil and Gas L.L.C. (OGRID No.

370507) Lease Name & Well Number: YO State SWD #1 Location Footage Calls: 660 FNL & 840 FWL

Legal Location: Lot D, S15 T21S R35E

Ground Elevation: 3,587'

Proposed Injection Interval: 5,540' – 6,104'

County: Lea

#### (2) Casing Information:

Туре	Hole Size	Casing Size	Casing Weight	Setting Depth	Sacks of Cement	Estimated TOC	Method Determined
Surface Casing	17-1/2"	13-3/8"	48 lb/ft	850'	750	Surface	Circulation
Intermediate Casing	12-1/2"	9-5/8"	40 lb/ft	5,420'	1,900	Surface	Circulation
Production Casing	8-3/4"	7"	26 lb/ft	12,536'	1,605	Surface	CBL
Liner	6-1/8"	5"	15 lb/ft	12,273' - 13,962'	105	12,662'	CBL

DV Tools set on 7" casing at: 4,166', 5,335', and 9,797'

#### (3) Tubing Information:

4.5" (11.6 lb/ft) ICP L80 or N80 injection tubing with setting depth of 5,520'.

(4) Packer Information: Baker Hughes Hornet or equivalent packer set at 5,520'.

В.

(1) Injection Formation Name: Delaware

Pool Name: SWD; Delaware

**Pool Code: 96100** 

- (2) Injection Interval: Perforated injection between 5,540′ 6104′
- (3) Drilling Purpose: Plug back for saltwater disposal in Delaware Mountain Group.
- (4) Other Perforated Intervals: Perforations from 13,518′ 13,718′ and open hole from 13,962′ 14,347′ are currently being utilized to inject into the Devonian Formation. These Perforations will be properly plugged and abandoned during the plug back of the YO State SWD #1 into a Delaware Mountain Group injection well.
- (5) Overlying Oil and Gas Zones: Below are the approximate formation tops for known oil and gas producing zones in the area.
  - Yates (3,680')

**Underlying Oil and Gas Zones:** Below are the approximate formation tops for known oil and gas producing zones in the area.

- Bone Spring (7,578')
- Wolfcamp (10,156')
- Morrow (11,669')

#### **Application for Authorization to Inject**

Well Name: YO State SWD #1

**API**: 30-025-38162

#### V – Well and Lease Maps

The following maps and documents are included in **Attachment 2**:

- 2-mile Oil & Gas Well Map
- 1/2-Mile Well Detail List
- Penetrating Wellbore Diagram (Plugged Wells)
- 2-Mile Lease Map
- 2-Mile Mineral Ownership Map
- 2-Mile Surface Ownership Map
- Potash Lease Map

#### VI – AOR Well List

A list of the wells within the 1/2-mile AOR is included in Attachment 2.

There is one (1) well within the 1/2-mile AOR which penetrates the injection zone. This well has been properly cased, cemented, and plugged to isolate the injection zone. A wellbore diagram, casing information, and plugging details for this well is also included in **Attachment 2**.

#### VII – Proposed Operation

- (1) Proposed Maximum Injection Rate: 8,000 bpd Proposed Average Injection Rate: 4,000 bpd
- (2) A closed-loop system will be used.
- (3) Proposed Maximum Injection Pressure: 1,108 psi (surface)
  Proposed Average Injection Pressure: approximately 720 psi (surface)
- (4) Source Water Analysis: It is expected that the injectate will consist of produced water from production wells completed in the Yates, Bone Spring, and Morrow formations. Analysis of water from these formations is included as **Attachment 3**.
- (5) Injection Formation Water Analysis: The proposed SWD will be injecting water into the Delaware Mountain Group which is a non-productive zone known to be compatible with formation water from the Yates, Bone Spring, and Morrow formations. Water analyses from the Delaware formation in the area are included as **Attachment 4**.

#### **VIII – Geologic Description**

The proposed injection interval includes the Delaware Mountain Group from 5,540 to 6,104 feet. This formation consists of fine-grained Permian age sandstones with interbedded siltstones. Several thick intervals of porous and permeable sandstones capable of taking water are present within the Delaware Mountain Group in the area.

The base of the USDW is at a depth of approximately 850 feet. Water well depth in the area is approximately 150 feet below the ground surface.

#### **Application for Authorization to Inject**

Well Name: YO State SWD #1

**API**: 30-025-38162

#### IX – Proposed Stimulation Program

A small cleanup acid job may be used to treat the new perforations in the Delaware Mountain Group. However, no other formation stimulation is currently planned.

#### X – Logging and Test Data

Logs will be submitted to the Division upon completion of the well.

#### XI – Fresh Groundwater Samples

Based on a review of data from the New Mexico Office of the State Engineer, one (1) water well is located within 1-mile of the proposed SWD location. This water well was sampled on June 7, 2015.

A water well map, details of the water well within 1-mile, and the associated water analyses are included in **Attachment 5**.

#### XII – No Hydrologic Connection Statement

No faulting is present in the area that would provide a hydrologic connection between the injection interval and overlying USDWs. Additionally, the casing program has been designed to ensure there will be no hydrologic connection between the injection interval and overlying USDWs.

A signed No Hydrologic Connection Statement is included as Attachment 6.

#### XIII – Proof of Notice

A Public Notice was filed with the Hobbs News-Sun newspaper and an affidavit is included in **Attachment 7**.

A copy of the application was mailed to the OCD district office, landowner, and all identified affected parties within 1/2-mile of the proposed SWD location. A list of the recipients, as well as delivery confirmations, are included in *Attachment 7*.

## **Attachments**

#### Attachment 1:

- C-102
- As-Built Wellbore Diagram
- Proposed Recompletion Wellbore Diagram
- Packer Diagram

#### **Attachment 2:** Area of Review Information:

- 2-Mile Oil & Gas Well Map
- 1/2-Mile Well Detail List
- Penetrating Wellbore Diagram (Plugged Wells)
- 2-Mile Lease Map
- 2-Mile Mineral Ownership Map
- 2-Mile Surface Ownership Map
- Potash Lease Map

**Attachment 3:** Source Water Analyses

**Attachment 4:** Injection Formation Water Analyses

Attachment 5: Water Well Map and Well Data

- Water Well Map
- Well Data

Attachment 6: No Hydrologic Connection Statement

**Attachment 7:** Public Notice Affidavit and Notice of Application Confirmations

#### Attachment 1

- C-102
- As-Built Wellbore Diagram
- Proposed Recompletion Wellbore Diagram
- Packer Diagram

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 Road, Aztec, NM 87410 Phone: (505) 334-6178 Fax: (505) 334-6170 District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505 Phone: (505) 476-3460 Fax: (505) 476-3462

State of New Mexico

OIL CONSERVATION DIVISION

1220 South St. Francis Dr.

Santa Fe, NM 87505

Energy, Minerals & Natural Resources Department

Form C-102 Revised August 1, 2011

Submit one copy to appropriate

DEC 1 6 2015 District Office MENDED REPORT

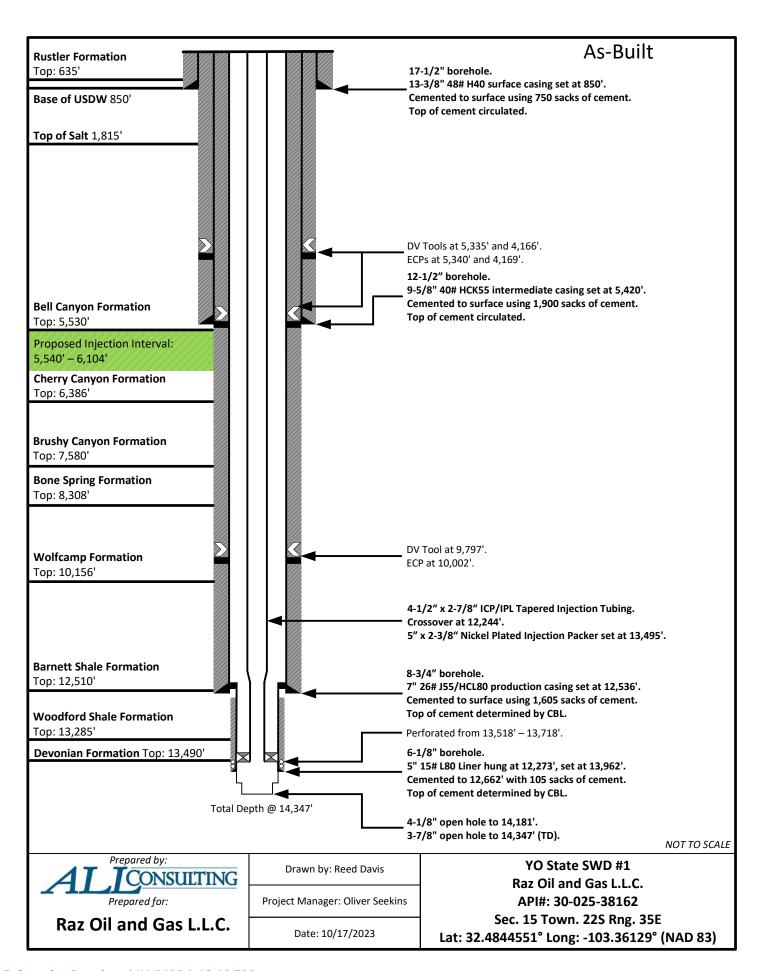
RECEIVED

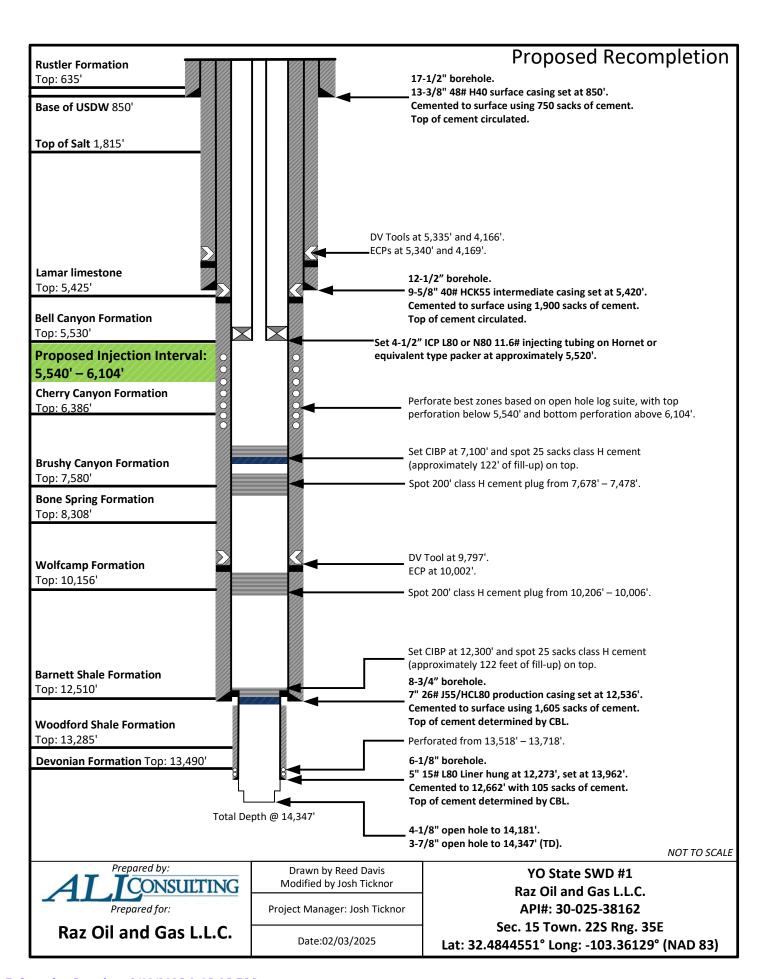
WELL LOCATION AND ACREAGE DEDICATION PLAT

	API Number 0-025-38162			<sup>2</sup> Pool Code 97996		<sup>3</sup> Pool Name SWD; Cherry Canyon – Brushy Canyon					
<sup>4</sup> Property 0 315024					<sup>6</sup> Well Number 001						
<sup>7</sup> OGRID 370507		8 Operator Name Raz Oil and Gas, LLC							<sup>9</sup> Elevation 3587		
					<sup>10</sup> Surface ]	Location					
UL or lot no. D	Section 15	Township 21S	Range 35E	Lot Idn	Feet from the 660	North/South line N	Feet from the 840	East/West line W	County Lea		
			" Bo	ttom Hol	e Location If	Different From	n Surface				
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County		
Dedicated Acre	s 13 Joint o	r Infill 14 C	onsolidation	Code 15 Or	der No.						

No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.

← 840' → 660'		17 OPERATOR CERTIFICATION  I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.
	See original survey plat signed 11/10/2006  Lat: 32.4844551  Long: -103.36129  NAD83  Per NMOCD Well File	Signature  Danny J. Holcomb, Agent for Raz Oil and Gas LLC Printed Name  danny@pwllc.net E-mail Address  **SURVEYOR CERTIFICATION I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys
		made by me or under my supervision, and that the same is true and correct to the best of my belief.  Date of Survey Signature and Seal of Professional Surveyor:  Certificate Number





#### **HORNET Packer**

Product Family No. H64682

#### **HORNET EL Packer**

#### Product Family No. H64683

#### **APPLICATION**

The mechanically set HORNET™ packer offers ease of operation with quarter-turn right to set and release. Converting it for wireline-setting applications is simple and inexpensive. The HORNET packer provides for landing in compression, tension, or neutral positions. Every component from the jay track, to the internal bypass, to the packing-element system and the upper slip assembly has been developed to ensure the HORNET's setting and releasing reliability.

The HORNET EL packer is run and set on electric line using an E- $4^{\text{TM}}$  (Product Family No. H43702) with a slow-set power charge or a  $J^{\text{TM}}$  setting tool (Product Family No. H41371) and a special wireline adapter kit. An L- $10^{\text{TM}}$  type on/off seal nipple is run on top of the packer to connect the tubing to the packer and to house a blanking plug when the packer is used as a temporary bridge plug.

#### **Advantages**

#### Upper Slip Assembly:

- Thoroughly tested across API minimum to maximum casing ID tolerances for each specified casing weight, for setting and releasing reliability
- Slip-wicker configuration providing bidirectional-load support with solid upper cone to support highest tensile loads
- Staged-release action eliminates high-overpull requirement
- Minimal set-down weight required to anchor slips

#### Internal Bypass Seal:

- Durable bypass seal design provides sealing after unloading, under differential pressures
- No O-ring sealing system

#### Packing Element System:

- Fully tested to combined ratings at the API's maximum ID tolerance
- Patented enhancements to control overboost
- High-performance, three-piece element system

#### Lower Slip and Jay Assembly:

- Slips and drag blocks tested to maximum API tolerance ID for positive set and ease of release
- One-quarter-turn right setting and releasing action
- Packoff of packing elements with applied tension or compression
- Spacing in jay ensures opening of internal bypass, before slip releasing action begins—important to both ease of release and safety
- Automatically returns to running position



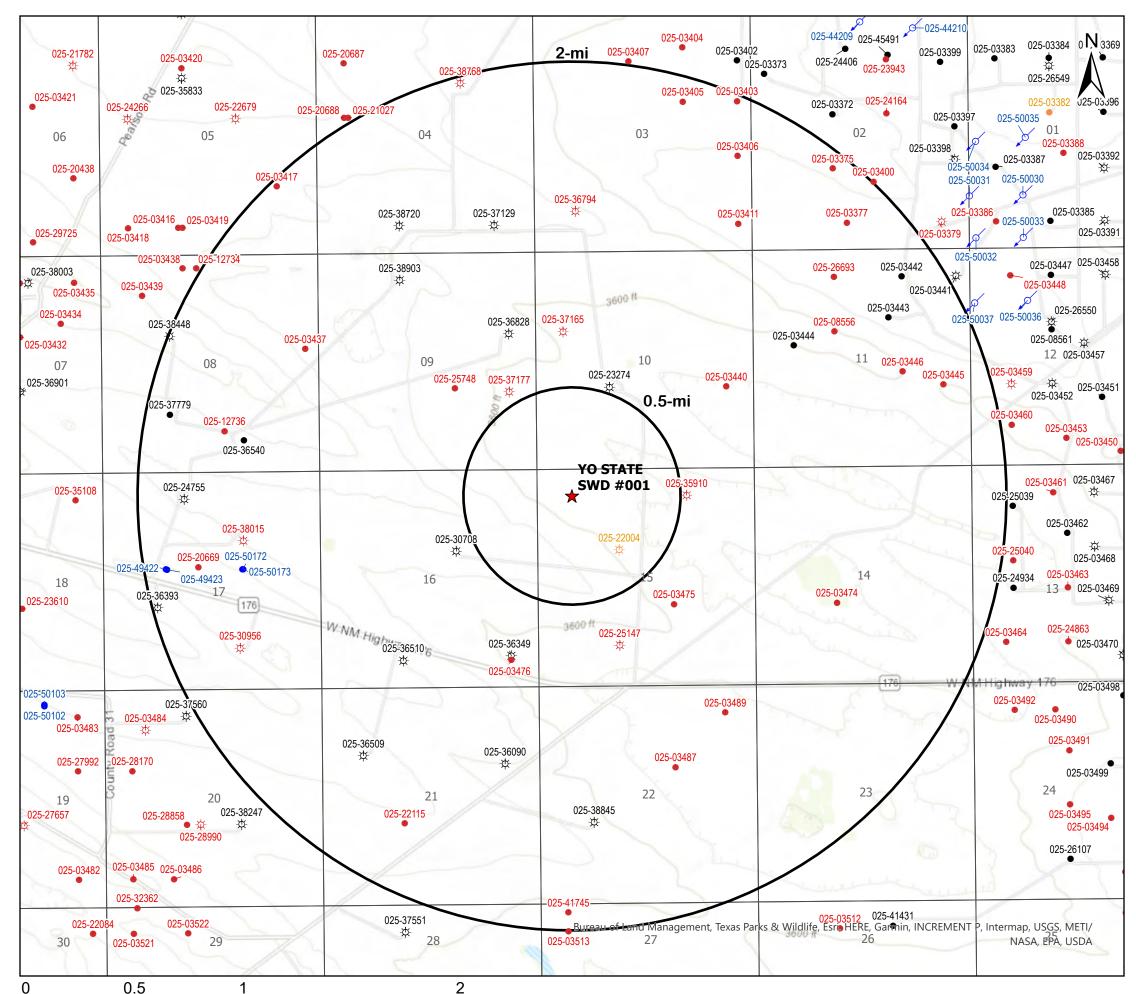
#### Attachment 2

Area of Review Information:

- 2-mile Oil & Gas Well Map
- 1/2-Mile Well Detail List
- Penetrating Wellbore Diagram (Plugged Wells)
- 2-mile Lease Map
- 2-mile Mineral Ownership Map
- 2-mile Surface Ownership Map
- Potash Lease Map

Received by OCD: 3/10/2025 9:49:27 AM

Page 35 of 152



■ Miles

### Legend

- ★ YO STATE SWD #1 (1)
- Gas, Active (34)
- Gas, Plugged (16)
- Gas, Temporary Abandonment
  (1)
- Injection, New (10)
- Oil, Active (28)
- Oil, New (6)
- Oil, Plugged (79)
- Oil, Temporary Abandonment (1)

Source Info: NMOCD O&G Wells updated 9/7/2023 (https://ocd-hub-nm-emnrd.hub.arcgis.com/search)

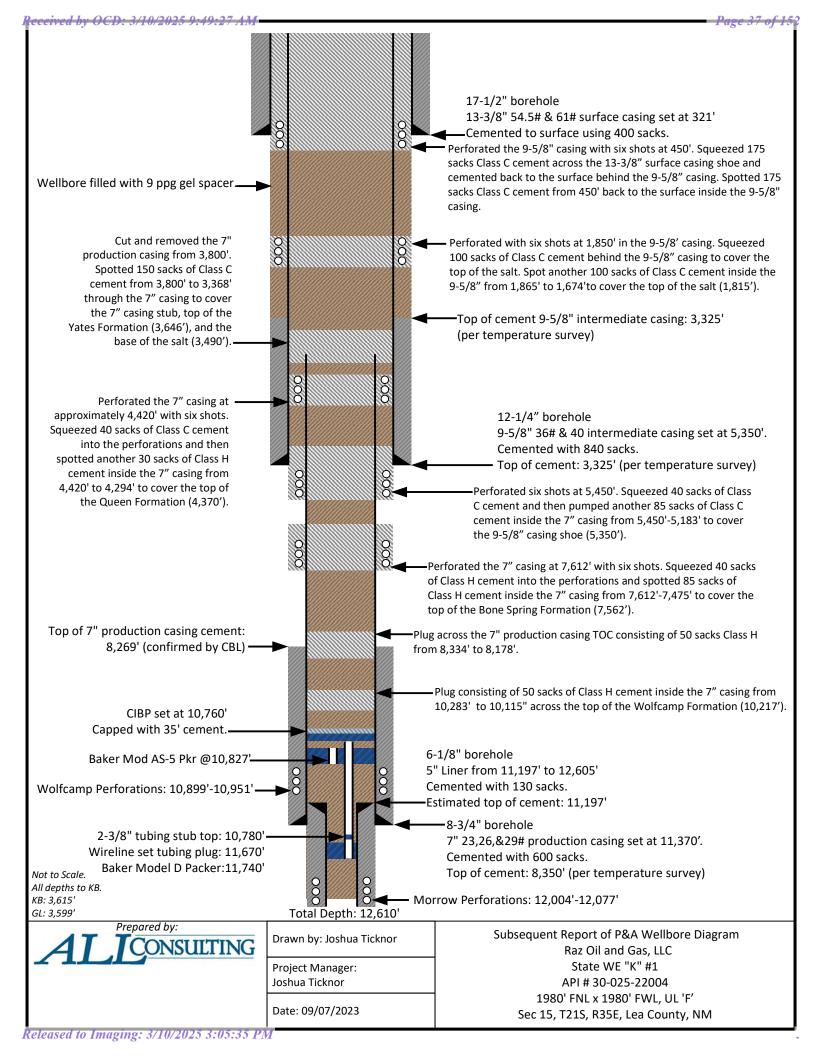


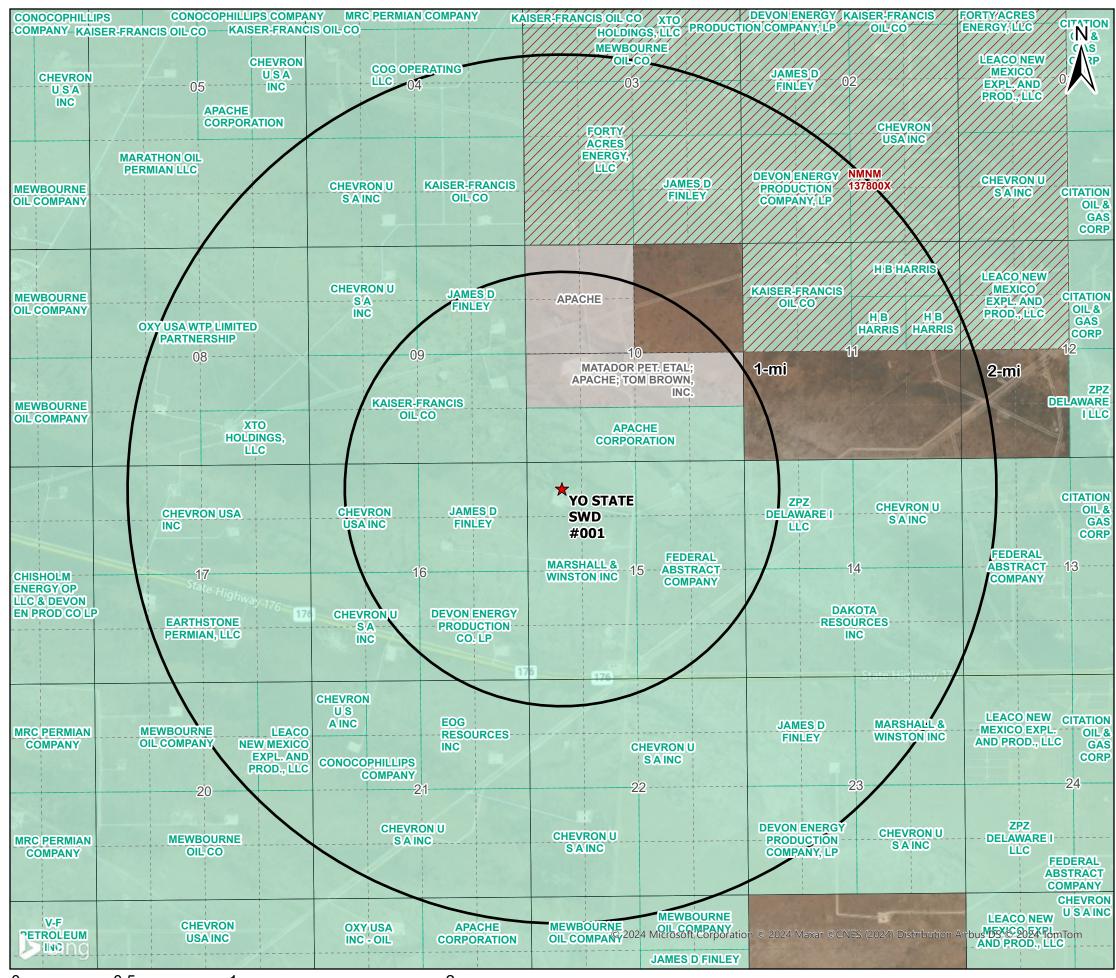
Received by OCD: 3/10/2025 9:49:27 AM

P
ag
0
36
.0
7
5
1

AOR Tabulation for Yo State SWD #001 (Top of Injection Interval: 5,540' - 6,930')									
Well Name	API#	Well Type	Operator	Spud Date	Location (Sec., Tn., Rng.)	Total Vertical Depth (feet)	Penetrate Inj. Zone?		
STATE WE K #001	30-025-22004	Plugged	Raz Oil and Gas LLC	1/10/1967	F-15-21S-35E	12,610 (plugged)	Yes		

Casing / Plugging Information for Wells Penetrating the Yo State SWD #001 Injection Zone									
Well Name	Туре	Set Depth	Casing Size	тос	TOC Method Determined	Sks of Cement	Hole Size		
	Surface	321'	13.375"	Surface	Circulation	400	17.5"		
	Intermediate	5,350'	9.625"	3,325'	Temperature Survey	840	12.25"		
	Production	4,420' - 11,370'	7"	8,350'	Temperature Survey	600	8.75"		
STATE WE K #001	Liner	11,197' - 12,605'	5"	11,197'	Estimated	130	6.125"		
	Plugging Details: Tubing plug @11,670'. CIBP @10,760' capped with 35' cement. Plugs @10,283' - 10,115' with 50 sx, @8,334' - 8,178' with 50 sx. Perf and squeeze @7,612' to 7,475' with 40 sx								
	and spotted 85 sx inside 7" casing from 7,612' - 7,475', @5,450' - 5,183' with 40 sx and spotted 80 sx from 5,450' - 5,183', @4,420' - 4,294' w/ 70 sx. 7" casing cut and pulled @3,800', spotted 150								
	sx from 3,800' to	3,368'. Perf and sq	ueeze @1,850' - 1,674' with 100 sx and spotted 10	0 sx from 1,865' -	1,674', @450' - surface with 1	75 sx and spotted 175 sx from 450'	- surface.		





### Legend

★ YO STATE SWD #1
BLM Communitization Units
NMSLO Mineral Leases
Private Mineral Leases

Source Info: BLM Mineral Leases (https://catalog.data.gov/dataset/blm-new-mexico-mineral-ownership). NMSLO Mineral Leases (http://www.nmstatelands.org/maps-gis/gis-data-download/). Where applicable, Private Mineral Leases were identified utilizing Enverus, Midland Maps, or operator identified lease data.



### **YO STATE SWD #001**

Lea County, New Mexico

Proj Mgr: Reed Davis November 08, 2024

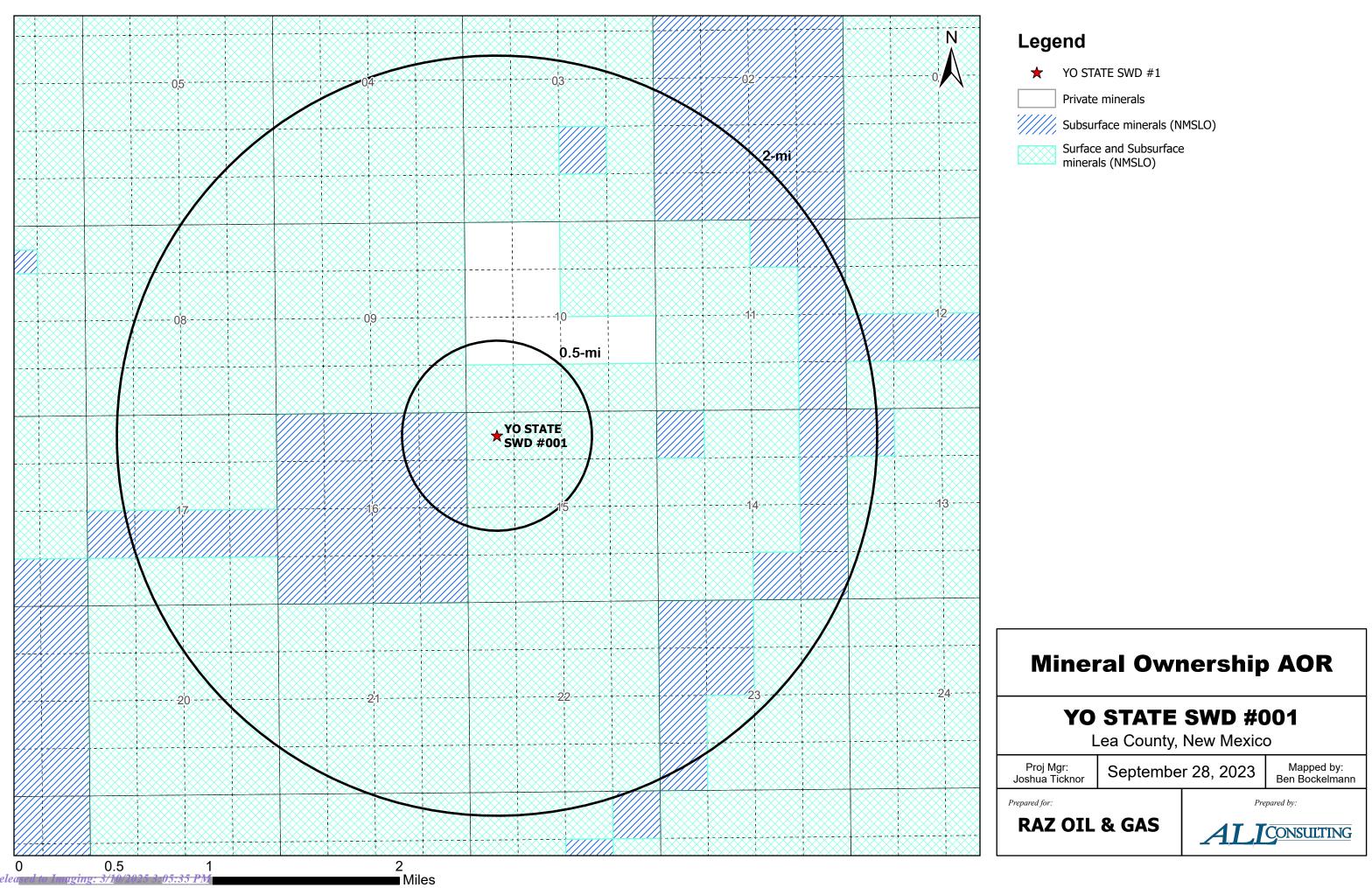
Mapped by: Ben Bockelmann

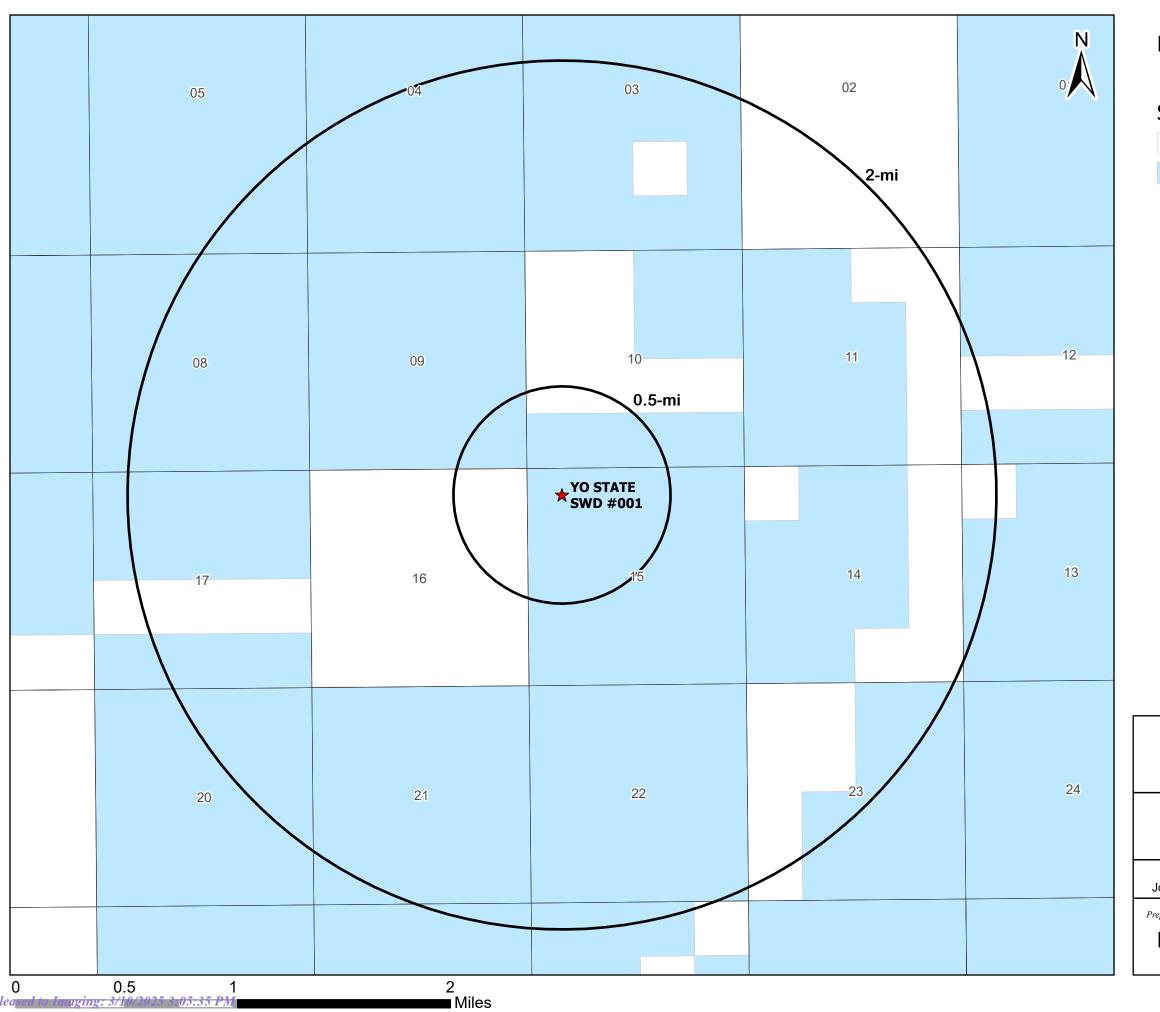
Prepared for:

**RAZ OIL & GAS** 



0 0.5 1 2 Relea<del>ved to Inaging: 3/10/2025 3-05:35 PM</del>





### Legend

★ YO STATE SWD #1 (1)

### Surface Ownership

Private (9)

State (2)

### **Surface Ownership AOR**

### **YO STATE SWD #001**

Lea County, New Mexico

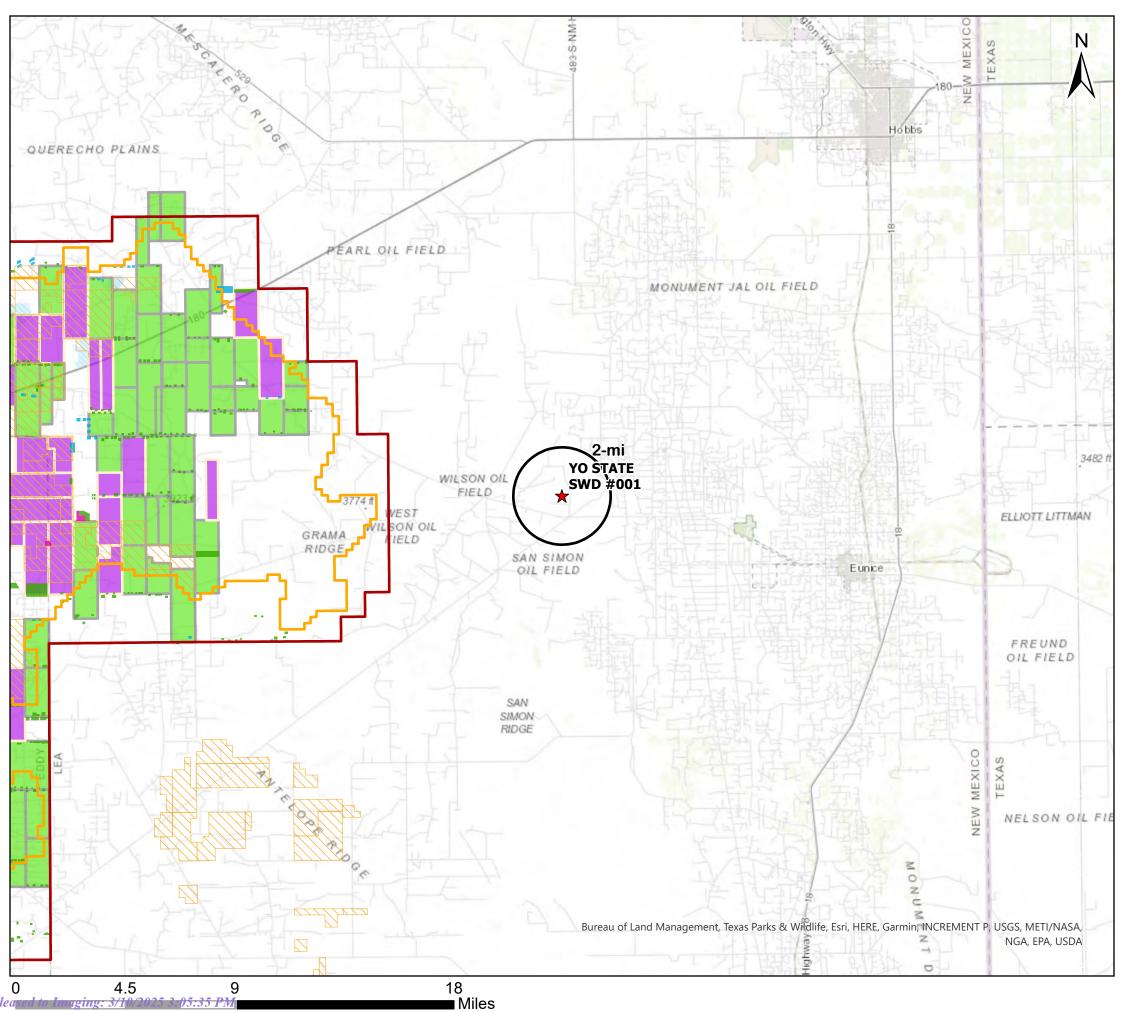
Proj Mgr: September 28, 2023

pared for:

**RAZ OIL & GAS** 



Mapped by: Ben Bockelmann



### Legend

★ YO STATE SWD #1

SOPA 1986

Known Potash Leasing Area

Potash Leases

Drill Islands

Status, Depth Buffer

Approved, Half Mile

Approved, Quarter Mile

Nominated, Half Mile

**Development Areas** 

Status

Approved

Pending

### **Potash AOR**

### **YO STATE SWD #001**

Lea County, New Mexico

Proj Mgr: Joshua Ticknor

September 28, 2023

Mapped by: Ben Bockelmann

Prepared for:

**RAZ OIL & GAS** 



Source Water Analysis

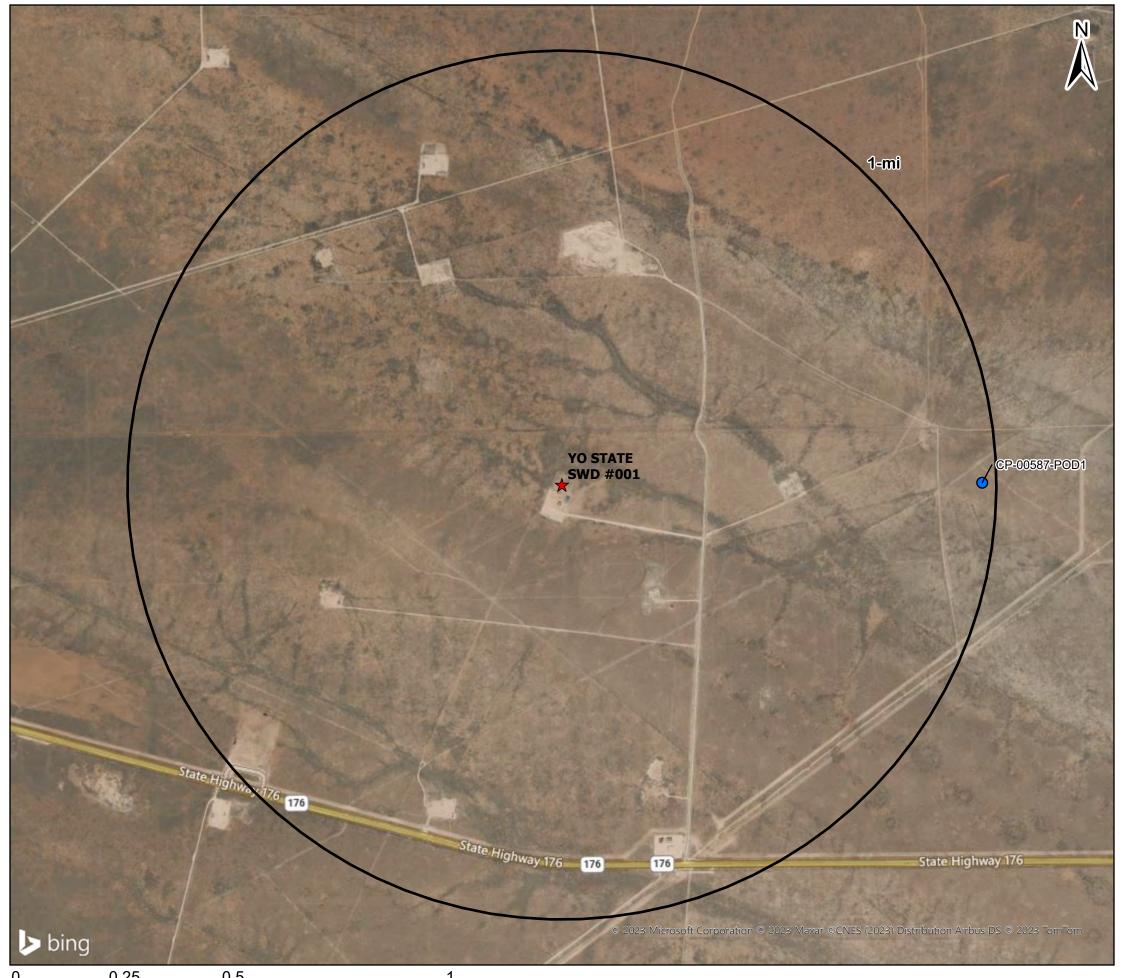
	Sourc	ce Wat	ter Ana	lysis						
z Oil	and G	as LLC -	- YO Sta	te SW	D #001					
Jnit	Ftgns	Ftgew	County	State	Field	Formation	TDS (mg/L)	Chloride (mg/L)	Bicarbonate (mg/L)	Sulfate (mg/l
Н	1980N	660E	LEA	NM	LYNCH	BONE SPRING	173,141	93,660	5,174	7,916
T	2310S	660W	LEA	NM	GRAMA RIDGE NORTH	BONE SPRING	294,627	216,575	74	403
L	1980S	660W	LEA	NM	BERRY NORTH	BONE SPRING	192,871	132,048	163	445
T	2310S	660W	LEA	NM	GRAMA RIDGE NORTH	BONE SPRING	294,627	216,575	74	403
D	330N	460W	Lea	NM		BONE SPRING 2ND SAND	261,089	160,264	122	425
В	200N	1980E	Lea	NM		BONE SPRING 2ND SAND	184,233	112,775	488	425

								<b>-</b>			ar y G.G						
						R	az Oi	I and G	as LLC	YO Sta	te SW	D #001					
Well Name	API	Latitude	Longitude	Section	Township	Range	Unit	Ftgns	Ftgew	County	State	Field	Formation	TDS (mg/L)	Chloride (mg/L)	Bicarbonate (mg/L)	Sulfate (mg/L)
APPLESEED FEDERAL COM #001	3002520377	32.5750008	-103.4730377	17	20S	35E	Н	1980N	660E	LEA	NM	LYNCH	BONE SPRING	173,141	93,660	5,174	7,916
HUNT APO STATE #001	3002527135	32.5070038	-103.4812317	4	21S	34E	T	2310S	660W	LEA	NM	GRAMA RIDGE NORTH	BONE SPRING	294,627	216,575	74	403
BERRY APN STATE #001	3002527250	32.5060349	-103.4983444	5	21S	34E	L	1980S	660W	LEA	NM	BERRY NORTH	BONE SPRING	192,871	132,048	163	445
HUNT APO STATE #001	3002527135	32.5070038	-103.4812317	4	21S	34E	Т	2310S	660W	LEA	NM	GRAMA RIDGE NORTH	BONE SPRING	294,627	216,575	74	403
MONK 21 STATE COM #001H	3002540986	32.4706993	-103.4818954	21	21S	34E	D	330N	460W	Lea	NM		BONE SPRING 2ND SAND	261,089	160,264	122	425
MONK 21 STATE #004H	3002542193	32.4710767	-103.4727296	21	21S	34E	В	200N	1980E	Lea	NM		BONE SPRING 2ND SAND	184,233	112,775	488	425
GAUCHO UNIT #007H	3002534440	32.3889961	-103.4941711	17	22S	34E	K	1650S	1980W	Lea	NM		BONE SPRING 2ND SAND	166,698	101,677	61	675
GAUCHO UNIT #015H	3002541566	32.3841896	-103.4984589	20	22S	34E	D	100N	660W	Lea	NM		BONE SPRING 2ND SAND	158,147	96,378	232	710
GAUCHO UNIT #011H	3002541184	32.385006	-103.4891129	17	22S	34E	О	200S	1730E	Lea	NM		BONE SPRING 3RD SAND	156,141	97,978	305	1,005
GAUCHO UNIT #010H	3002541183	32.385006	-103.4892731	17	22S	34E	О	200S	1780E	Lea	NM		BONE SPRING 3RD SAND	165,155	100,777	220	560
GAUCHO UNIT #010H	3002541183	32.385006	-103.4892731	17	22S	34E	О	200S	1780E	Lea	NM		BONE SPRING 3RD SAND	165,155	100,777	220	560
WILSON DEEP UNIT #001	3002520461	32.4805832	-103.4253387	13	21S	34E	F	2080N	2080W	LEA	NM	WILSON	MORROW	11,648	566	2,161	5,252
EUNICE MONUMENT SOUTH UNIT #102	3002504326	32.5495567	-103.3014832	25	20S	36E	A	660N	660E	Lea	NM		YATES		247,872	1,091	30,984

Injection Formation Water Analysis

								Inje	ection	Forma	tion '	Water Analysis					
						Raz Oi	l and					01 - Delaware Mo	untain Group				
Vell Name	API	Latitude	Longitude	Section	Township	Range	Unit	Ftgns	Ftgew	County	State	Field	Formation	TDS (mg/L)	Chloride (mg/L)	Bicarbonate (mg/L)	Sulfate (mg/
MOBIL LEA STATE #001	3002531696	32.5999107	-103.5331573	2	20S	34E	K	1800S	1980W	LEA	NM	LEA NORTHEAST	DELAWARE	152,064	102,148	404	69
IOBIL LEA STATE #003	3002532105	32.5976906	-103.5367584	2	20S	34E	M	990S	870W	LEA	NM	LEA NORTHEAST	DELAWARE	296,822	215,237	143	29
IOBIL LEA STATE #005	3002532466	32.6028633	-103.5367584	2	20S	34E	Е	2440N	870W	LEA	NM	LEA NORTHEAST	DELAWARE	340,838	245,270	229	14
EA UNIT #001	3002502427	32.5858536	-103.520256	12	20S	34E	L	1980S	660W	LEA	NM	LEA	DELAWARE	214,787	132,700	208	1,81
GAUCHO 21 FEDERAL #002H	3002540626	32.3709793	-103.4823151	21	22S	34E	M	375S	375W	Lea	NM		DELAWARE-BRUSHY CANYON	266,468	167,562	366	

- Water Well Map
- Well Data



### Legend

★ YO STATE SWD #1 (1)

### **OSE PODs**

### Status

- O Active (1)
- Pending (0)
- Change Location of Well (0)
- Capped (0)
- Plugged (0)
- Incomplete (0)
- Unknown (0)

Source Info: NMOSE PODs updated 9/21/2023 (https://geospatialdata-ose.opendata.arcgis.com/search?collection=Dataset)



### **YO STATE SWD #001**

Lea County, New Mexico

Proj Mgr: Joshua Ticknor September 27, 2023

Mapped by: Ben Bockelmann

Prepared for:

**RAZ OIL & GAS** 



0 0.25 0.5 1 Released to Longing: 3/10/2025 3 05:35 PM

			Water Well San	npling Rationale	
		Ra	z Oil and Gas LLC	- YO State SWD #0	001
Water Wells	Owner	Available Contact Information	Use	Sampling Required	Notes
CP-00587-POD1	The Merchant Livestock Company	P.O. Box 1105 Eunice, NM 88231spencer@merchantlivestock.com	Livestock Watering	Yes	CP-00587-POD1 was sampled on June 7, 2015.



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

### Analytical Results For:

RAZ OIL & GAS BEN THOMPSON P. O. BOX 1180 EUNICE NM, 88231

Fax To:

NONE GIVEN

Received:

06/08/2015

Reported:

06/12/2015 WATER WELL CP00587

Project Name: Project Number:

NONE GIVEN

Project Location:

LEA COUNTY, NM

Sampling Date:

06/07/2015

Sampling Type:

Water

Sampling Condition:

\*\* (See Notes)

Sample Received By:

Jodi Henson

Sample ID: WELL WATER (H501468-01)

Chloride, SM4500CI-B

mg/L

Analyzed By: AP

		<u> </u>							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride*	92.0	4.00	06/09/2015	ND	104	104	100	0.00	
TDS 160.1	m	g/L	Analyze	ed By: AP			<del></del> .		
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
TDS*	860	5.00	06/11/2015	ND	552	105	527	1.35	

Cardinal Laboratories

\*=Accredited Analyte

PLEASE MOTE: Usbillty and Denages. Cardinal's liability and client's exclusive remesty for any daim arising, whether based in contract or tort, shell be limited to the amount paid by client for analyses. All claims, including trose for negligence and any other cause whistoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for inodernal or consequential demages, including, without limitation, business interruptions, less of use, or loss of profits incurred by client, its subjectives or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claims is based upon any of the attract stated relations or otherwise. Results relate only to the samples identified above, it is report shall not be reproduced except in fall with written approval of Cardinal laboratories.

alex & Kene

Celey D. Keene, Lab Director/Quality Manager

Page 2 of 4

No Hydrologic Connection Statement



### RE: Raz Oil and Gas LLC – YO State SWD #1 – Plug Back Saltwater Disposal Application, Lea County, New Mexico

ALL Consulting LLC (ALL) has performed a thorough hydrologic investigation related to the proposed plug back of the YO State SWD #1 into the Delaware Mountain Group. The hydrologic investigation was conducted to determine if there were any existing or potential connections between the proposed injection intervals in the Delaware Mountain Group and the deepest underground source of drinking water (USDW).

ALL performed an assessment and analysis of the subsurface geophysical log data along with published documents on the groundwater in this vicinity of Lea County, New Mexico. Based on ALL's assessment and analysis there is containment through multiple confining zones above the Delaware Mountain Group and the USDW and over 4,690 feet of vertical separation between the base of the USDW and the top of the injection interval. Additionally, there is no evidence of extensive faulting that would allow for communication between the USDW and the Delaware Mountain Group.

October 19, 2023

Tom Tomastik

Date

Chief Geologist and Regulatory Specialist

Jon Tomartel

ALL Consulting LLC

Public Notice Affidavit and Notice of Application Confirmations

### **APPLICATION FOR AUTHORIZATION TO INJECT**

NOTICE IS HEREBY GIVEN: That Raz Oil and Gas L.L.C., P.O. Box 1180 Eunice, NM 88231, is requesting that the New Mexico Oil Conservation Division administratively approve the APPLICATION FOR AUTHORIZATION TO INJECT as follows:

PURPOSE: The intended purpose of the injection well is to dispose of salt water produced from permitted oil and gas wells.

WELL NAME AND LOCATION: YO State SWD #1

Located 12.24 miles northwest of Eunice, NM

NW ¼ NW ¼, Section 15, Township 21S, Range 35E

660' FNL & 840' FWL

Lea County, NM

NAME AND DEPTH OF DISPOSAL ZONE: Delaware Mountain Group (5,540' – 6,930')

EXPECTED MAXIMUM INJECTION RATE: 20,000 Bbls/day

EXPECTED MAXIMUM INJECTION PRESSURE: 1,108 psi (surface)

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 Joshua Ticknor at (580)-916-2126.

### **Affidavit of Publication**

STATE OF NEW MEXICO COUNTY OF LEA

I. Daniel Russell, Publisher of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, solemnly swear that the clipping attached hereto was published in the regular and entire issue of said newspaper, and not a supplement thereof for a period of 1 issue(s).

> Beginning with the issue dated October 24, 2023 and ending with the issue dated October 24, 2023.

**LEGAL NOTICE** October 24, 2023

### APPLICATION FOR AUTHORIZATION TO INJECT

NOTICE IS HEREBY GIVEN: That Raz Oil and Gas L.L.C., P.O. Box 1180 Eunice, NM 88231, is requesting that the New Mexico Oil Conservation Division administratively approve the APPLICATION FOR AUTHORIZATION TO INJECT as follows:

PURPOSE: The intended purpose of the injection well is to dispose of salt water produced from permitted oil and gas wells.

WELL NAME AND LOCATION:

YO State SWD #1

Located 12.24 miles northwest of Eunice, NM NW ¼ NW ¼, Section 15, Township 21S, Range 35E 660' FNL & 840' FWL

Lea County, NM

NAME AND DEPTH OF DISPOSAL ZONE: EXPECTED MAXIMUM INJECTION RATE: EXPECTED MAXIMUM INJECTION PRESSURE:

Delaware Mountain Group (5,540' - 6,930')

ner, o

20,000 Bbls/day 1,108 psi (surface)

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, South St. Francis Dr., Santa Fe, New Mexico 87505.

Additional information may be obtained by contacting Oliver Seekins at 918-382-7581.

Publisher

Sworn and subscribed to before me this 24th day of October 2023.

My commission expires June 07, 2024

(Seal)



This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937 and payment of fees for said publication has been made.

67115320

00284109

DANIEL ARTHUR ALL CONSULTING 1718 S. CHEYENNE AVE. TULSA, OK 74119

	Raz Oil and Gas L.L.C - Y	O State SWD #1 - Affected Person	ons			
Affected Party Classification	Entity - Proof of Notice	Entity - As Mapped/Exhibited	Address	City	State	Zip Code
Mineral / Surface Owner	New Mexico State Land Office	NMSLO	310 Old Santa Fe Trail	Santa Fe	NM	87501
NMOCD District Office	New Mexico Oil Conservation District 1	N/A	1625 N. French Drive	Hobbs	NM	88240
NMSLO Lessee	Federal Abstract Company	Federal Abstract Company	P.O. Box 4362	Houston	TX	77210-4362
NMSLO Lessee	Devon Energy Production Company Limited Partnership	Devon Energy Production Co. LP	333 W Sheridan Avenue	Oklahoma City	OK	73102
NMSLO Lessee	James D. Finley	James D Finley	1308 Lake Street Suite 200	Fort Worth	TX	76102
NMSLO / Fee Lessee	Apache Corporation	Apache Corporation	303 Veterans Airpark Ln #1000	Midland	TX	79705
NMSLO Lessee	Kaiser-Francis Oil Company	Kaiser-Francis Oil Co	P.O. Box 21468	Tulsa	OK	74121
Fee Lessee	Matador Resources Company	Matador Pet. Etal.	5400 LBJ Freeway, Suite 1500	Dallas	TX	75240
Fee Lessee	Tom Brown Incorporated	Tom Brown, Inc.	508 W Wall, Suite 500	Midland	TX	79701

**Notes:** The affected parties above received notification of this C-108 application.

Top of the page

Print de Stage itsing of and of complete in passage to

ALL Consulting LLC 1718 S Cheyenne Ave Tulsa OK 74119

\$7.180 US POSTAGE FIRST-CLASS ROM 74119 10/31/2023 stamps endicia FROM 74119

1718 S Cheyenne Ave Tulsa OK 74119

ALL Consulting LLC

\$7.180 US POSTAGE FIRST-CLASS POSTAGE RST-CLASS ROM 74119 10/31/2023 stamps endicia FROM 74119

\$7.180 US POSTAGE

FIRST-CLASS

FROM 74119

stamps endicia

10/31/2023

Place label at top of the center of the envelope and fold at dotted line.

stamps endicia Place label at top of the center of the envelope and fold at dotted line.

©ERTIFIED MAIL® CERTIFIED MAIL®



©ERTIFIED MAIL® CERTIFIED MAIL®



Federal Abstract Company PO BOX 4362 HOUSTON TX 77210-4362

James D. Finley 1308 LAKE ST STE 200 FORT WORTH TX 76102-4505

ALL Consulting LLC

1718 S Cheyenne Ave Tulsa OK 74119

Place label at top of the center of the envelope and fold at dotted line.

ALL Consulting LLC 1718 S Cheyenne Ave Tulsa OK 74119

Place label at top of the center of the envelope and fold at dotted line.

FIRST-CLASS ROM 74119 10/31/2023 stamps endicia

©EBTIFIED MAIL® CERTIFIED MAIL®



Tom Brown Incorporated 508 W WALL ST STE 500 MIDLAND TX 79701-5062

©ERTIFIED MAIL®

**CERTIFIED MAIL®** 

Kaiser-Francis Oil Company PO BOX 21468 TULSA OK 74121-1468

ALL Consulting LLC 1718 S Cheyenne Ave Tulsa OK 74119

Place label at top of the center of the envelope and fold at dotted line.



ALL Consulting LLC 1718 S Cheyenne Ave Tulsa OK 74119

Place label at top of the center of the envelope and fold at dotted line.



CERTIFIED MAIL® CERTIFIED MAIL®



CERTIFIED MAIL® CERTIFIED MAIL®



Matador Resources Company 5400 LBJ FWY STE 1500 DALLAS TX 75240-1017

Apache Corporation 303 VET AIRPARK LN STE 1000 MIDLAND TX 79705-4572

ALL Consulting LLC 1718 S Cheyenne Ave Tulsa OK 74119

Place label at top of the center of the envelope and fold at dotted line.

\$7.180 US POSTAGE FIRST-CLASS ROM 74119 10/31/2023 stamps endicia

ALL Consulting LLC 1718 S Cheyenne Ave Tulsa OK 74119

Place label at top of the center of the envelope and fold at dotted line.

\$7.180 US POSTAGE FIRST-CLASS FROM 74119 10/31/2023 stamps endicia

©ERTIFIED MAIL® CERTIFIED MAIL®



**Devon Energy Production Company** Limited Partnership 333 W SHERIDAN AVE OKLAHOMA CITY OK 73102-5010

©ERTIFIED MAIL® CERTIFIED MAIL®



New Mexico Oil Conservation District 1 1625 N FRENCH DR HOBBS NM 88240-9273

Place label at top of the center of the

envelope and fold at dotted line.

CERTIFIED MAIL®

**CERTIFIED MAIL®** 

ALL Consulting LLC 1718 S Cheyenne Ave Tulsa OK 74119

10/31/2023 stamps endicia

Place label at top of the center of the envelope and fold at dotted line.

**CERTIFIED MAIL®** 

CERTIFIED MAIL®

New Mexico State Land Office 310 OLD SANTA FE TRL SANTA FE NM 87501-2708

Place label at top of the center of the envelope and fold at dotted line.

> CERTIFIED MAIL® **CERTIFIED MAIL®**

CERTIFIED MAIL®

Place label at top of the center of the

envelope and fold at dotted line.

**CERTIFIED MAIL®** 

For best results, feed this sheet through your printer as few times as possible. 7\$1 places 25 Pids printing instructions go to www.stamps.com/3610.

YO State #1 SWD Volumetrics

12/30/2024

For injected fluids to impact the nearest DMG producer, they would need to horizontally traverse approximately 12.5 miles from the YO State #1 SWD. The closest active producing oil well (API #025-32937) is located 12.5 miles southwest. There is also a plugged DMG well (API #025-35108) located 2.29 miles due west, and an active DMG SWD (API #025-41703) situated 9.89 miles northwest.

To further substantiate RAZ's assertion that the YO State #1 SWD will not influence DMG production in the area, a volumetric analysis was conducted to determine the radius of the cylinder of emplaced waste (COEW). Under the assumption of homogeneous reservoir conditions and varying reasonable conservative values for unoccupied porosity, the COEW analysis calculates the extent of fluid spread. The radius of a fluid plume in a subsurface reservoir depends on the total volume of injected fluid, the porosity of the reservoir rock, and the geometric configuration of the spread (e.g., a full circle or a partial arc). The plume radius adjusts when the spread is constrained to a partial arc instead of a full 360-degree circle. This adjustment ensures that the same volume of fluid is accommodated within the reduced area of the arc.

The tables below summarize the results of the COEW radius calculations for both the **proposed maximum injection rate of 8,000 bpd** and results for additional scenarios at rates greater than the proposed maximum injection rate (13,000 bpd and 20,000 bpd) calculated for a **20-year injection period**. Results are provided for **porosity values ranging from 4% to 20%** and different **arc radii (15°, 30°, 45°, 90°, 180°, and 360°)**.

These results indicate that YO State #1 SWD injected fluids within the DMG injection zone would spread along a maximum distance of **10,619 feet** in a **4% porosity** formation along a **15° arc** under maximum injection rates, well below the distance those fluids would have to travel to impact the nearest DMG producer or reach the nearest plugged DMG well.

Results Tables are provided on the following pages.





YO State #1 SWD Volumetrics

12/30/2024

### SWD Cylinder of Emplaced Wastes –Proposed Maximum Injection Rate of 8,000 BPD

Porosity (%)	15° Arc Radius (ft)	30° Arc Radius (ft)	45° Arc Radius (ft)	90° Arc Radius (ft)	180° Arc Radius (ft)	360° Arc Radius (ft)
4% Φ	6,716 ft	4,749 ft	3,878 ft	2,742 ft	1,939 ft	1,371 ft
5% Φ	6,608 ft	4,672 ft	3,815 ft	2,698 ft	1,907 ft	1,349 ft
7% Ф	5,585 ft	3,949 ft	3,224 ft	2,280 ft	1,612 ft	1,140 ft
9% Ф	4,925 ft	3,483 ft	2,844 ft	2,011 ft	1,422 ft	1,005 ft
11% Ф	4,455 ft	3,150 ft	2,572 ft	1,819 ft	1,286 ft	909 ft
13% Ф	4,098 ft	2,898 ft	2,366 ft	1,673 ft	1,183 ft	836 ft
15% Φ	3,815 ft	2,698 ft	2,203 ft	1,557 ft	1,101 ft	779 ft
20% Ф	3,304 ft	2,336 ft	1,907 ft	1,349 ft	954 ft	674 ft

YO State #1 SWD Volumetrics

12/30/2024

### SWD Cylinder of Emplaced Wastes – Increased Rate Scenario of 13,000 BPD

Porosity (%)	15° Arc Radius (ft)	30° Arc Radius (ft)	45° Arc Radius (ft)	90° Arc Radius (ft)	180° Arc Radius (ft)	360° Arc Radius (ft)
4%	8,561	6,054	4,943	3,495	2,471	1,748
5%	8,423	5,956	4,863	3,439	2,432	1,719
7%	7,119	5,034	4,110	2,906	2,055	1,453
9%	6,278	4,439	3,625	2,563	1,812	1,282
11%	5,679	4,016	3,279	2,318	1,639	1,159
13%	5,224	3,694	3,016	2,133	1,508	1,066
15%	4,863	3,439	2,808	1,985	1,404	993
20%	4,212	2,978	2,432	1,719	1,216	860

YO State #1 SWD Volumetrics

12/30/2024

### SWD Cylinder of Emplaced Wastes – Increased Rate Scenario of 20,000 BPD

Porosity (%)	15° Arc Radius (ft)	30° Arc Radius (ft)	45° Arc Radius (ft)	90° Arc Radius (ft)	180° Arc Radius (ft)	360° Arc Radius (ft)
4%	10,619	7,509	6,131	4,335	3,065	2,168
5%	10,448	7,388	6,032	4,265	3,016	2,133
7%	8,830	6,244	5,098	3,605	2,549	1,802
9%	7,787	5,506	4,496	3,179	2,248	1,590
11%	7,044	4,981	4,067	2,876	2,033	1,438
13%	6,479	4,582	3,741	2,645	1,870	1,323
15%	6,032	4,265	3,483	2,463	1,741	1,231
20%	5,224	3,694	3,016	2,133	1,508	1,066

# Volumetric Calculations

Raz Oil and Gas YO State #1 SWD

A L LCONSULTING

# Description and Formula for Volumetric Arcs

### Overview

constrained to a partial arc instead of a full 360-degree circle. This adjustment ensures that injected fluid, the porosity of the reservoir rock, and the geometric configuration of the spread (e.g., a full circle or a partial arc). The plume radius adjusts when the spread is The radius of a fluid plume in a subsurface reservoir depends on the total volume of the same volume of fluid is accommodated within the reduced area of the arc.

### **Key Parameters**

- H (Thickness of injection zone): The perforated interval of the well in feet.
- **V** (**Volume of injectate**): The total volume of injectate. Equal to  $\mathbf{Q}^*\mathbf{T}$
- $\theta$  (**Porosity**): The fraction of pore space in the reservoir rock (dimensionless).
- T (Injection duration): Set to 20 years for historical analysis.
- Q (Injection rate): Set to maximum (20,000 bpd) or average (13,000 bpd) rate for forecast
- $\Pi$  (**Pi**): The constant ( $\approx 3.14159$ ).
- R (Radius of plume): The calculated radius of the circular or arc-shaped plume in feet.
- A\_arc (Area of the arc): The area of the arc in square feet.
- $\alpha$  (Arc angle): The angle of the arc in degrees (e.g.,  $360^{\circ}$  for a full circle,  $180^{\circ}$  for a half-



# Description and Formula for Volumetric Arcs

### Formula Derivations

1. Full Circle Plume Radius

For a 360-degree circular plume:

$$V = A_{circle} \cdot H \cdot heta$$

Where  $A_{circle}$  is the area of the full circle:

$$_{circle}=\pi R^{2}$$

Substituting for  $A_{circle}$ :

$$V = \pi R^2 \cdot H \cdot \theta$$

Solving for R:

$$R = \sqrt{rac{V}{\pi \cdot H \cdot heta}}$$

### 2. Partial Arc Plume Radius

For a partial arc, the total area of the arc ( $A_{arc}$ ) must equal the area of the circle that the arc would occupy if it were a full circle:

$$A_{arc} = rac{lpha}{360} \cdot \pi R_a^2$$

The volume of the emplaced waste remains the same, so:

$$V=A_{ar}$$

Substituting  $A_{arc}$ :

$$V = rac{lpha}{360} \cdot \pi R_{arc}^2 \cdot H \cdot heta$$

Solving for  $R_{arc}$ :

$$R_{arc} = \sqrt{rac{360 \cdot V}{lpha \cdot \pi \cdot H \cdot heta}}$$

- CONSULTING

## Application and Insights

•360-Degree Circle: Uniform fluid spread with the smallest radius.

•180-Degree Arc: Fluid spreads over a half-circle, increasing the radius by approximately 41%.

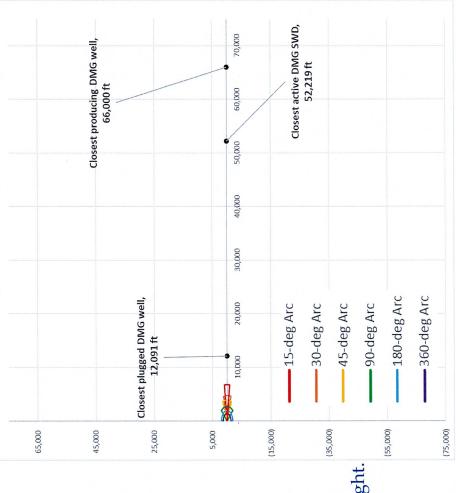
•90-Degree Arc: Fluid spreads over a quarter-circle, doubling the radius.

•Key Impact: Smaller arc angles lead to a larger plume radius to accommodate the same volume of fluid, driven by the constraint in directional flow.

A L CONSULTING

## Scenario: Proposed Injection Rate of 8,000 bpd Volumetric Arcs for YO State #1 SWD

Cylinder of Emplaced Waste Calculations Proposed Average Injection Rate of 8,000 BPD	0
4% Porosity Description	Value
Top of the Lamar limestone member (FT BGS)	5,425
Top of the Bell Canyon (FT BGS)	5,530
Top of the Cherry Canyon (FT BGS)	986,9
Top of the Brushy Canyon (FT BGS)	7,580
Proposed Top Perforation (FT BGS)	5,540
Proposed Bottom Perforation (FT BGS)	6,930
H = Thickness of the injection zone (FT)	1,390
T = Anticipated duration of injection over life of well (Days)	7,305
Q = Proposed injection rate (BPD)	8,000

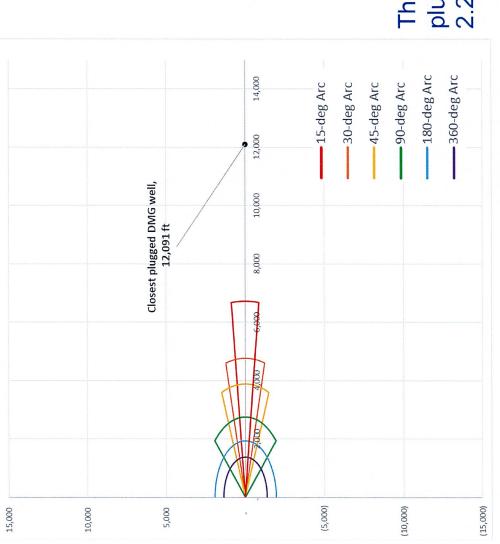


- YO State #1 SWD is located at the origin of chart.
- Presented volumetric plumes assume 4% porosity. Uses proposed perforated interval as formation height.
- Larger values of porosity result in smaller radii.
- Image illustrate most conservative case.

The closest active producing DMG well (API #025-32937) is 12.5 miles SW. The closest active DMG SWD (API #025-41703) is 9.89 miles NW. The closest plugged DMG well (API #025-35108) is 2.29 miles W



## Scenario: Proposed Injection Rate of 8,000 bpd Volumetric Arcs for YO State #1 SWD

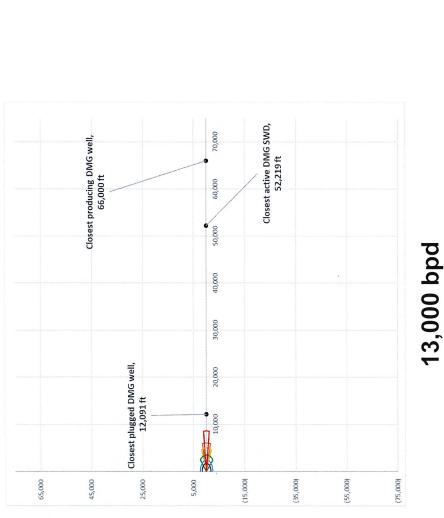


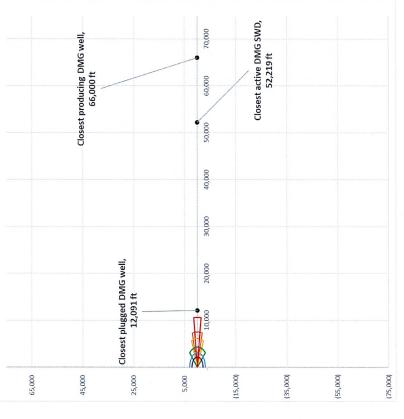
The closest DMG penetration is a plugged well (API #025-35108) 2.29 miles West.

### Zoomed In View



# Scenarios at Rates Greater than Proposed Injection Rate Volumetric Arcs for YO State #1 SWD





20,000 bpd

Fluid migration is limited to close proximity of the YO STATE #1 and does not extend to neighboring DMG penetrations.



### Volumetric Arcs as it Varies with Porosity Max Injection Rate: 8,000 BPD

Radius (ft)         Radius (ft)	Porosity	15° Arc	30° Arc	45° Arc	90° Arc	180° Arc	360° Arc
6,608 ft 4,749 ft 3,878 ft 2,742 ft 1,939 ft 5,585 ft 3,949 ft 3,224 ft 2,280 ft 1,612 ft 4,925 ft 3,483 ft 2,844 ft 2,011 ft 1,422 ft 1,815 ft 2,898 ft 2,356 ft 1,673 ft 1,183 ft 2,336 ft 1,349 ft 3,354 ft 1,907 ft 1,349 ft 954 ft		Radius (ft)					
6,608 ft       4,672 ft       3,815 ft       2,698 ft       1,907 ft         5,585 ft       3,949 ft       3,224 ft       2,280 ft       1,612 ft         4,925 ft       3,483 ft       2,844 ft       2,011 ft       1,422 ft         4,455 ft       3,150 ft       2,572 ft       1,819 ft       1,286 ft         4,098 ft       2,898 ft       2,366 ft       1,673 ft       1,183 ft         3,315 ft       2,698 ft       2,203 ft       1,557 ft       1,101 ft         3,304 ft       2,336 ft       1,907 ft       1,349 ft       954 ft	Ф	6,716 ft	4,749 ft	3,878 ft	2,742 ft	1,939 ft	1,371 ft
5,585 ft       3,949 ft       3,224 ft       2,280 ft       1,612 ft         4,925 ft       3,483 ft       2,844 ft       2,011 ft       1,422 ft         4,455 ft       3,150 ft       2,572 ft       1,819 ft       1,286 ft         4,098 ft       2,898 ft       2,366 ft       1,673 ft       1,183 ft         3,815 ft       2,698 ft       2,203 ft       1,557 ft       1,101 ft         3,304 ft       2,336 ft       1,907 ft       1,349 ft       954 ft	0	6,608 ft	4,672 ft	3,815 ft	2,698 ft	1,907 ft	1,349 ft
4,925 ft       3,483 ft       2,844 ft       2,011 ft       1,422 ft         4,455 ft       3,150 ft       2,572 ft       1,819 ft       1,286 ft         4,098 ft       2,898 ft       2,366 ft       1,673 ft       1,183 ft         3,815 ft       2,698 ft       2,203 ft       1,557 ft       1,101 ft         3,304 ft       2,336 ft       1,907 ft       1,349 ft       954 ft	θ	5,585 ft	3,949 ft	3,224 ft	2,280 ft	1,612 ft	1,140 ft
3,150 ft 2,572 ft 1,819 ft 1,286 ft 2,898 ft 2,366 ft 1,673 ft 1,183 ft 2,698 ft 2,203 ft 1,557 ft 1,101 ft 2,336 ft 1,907 ft 1,349 ft 954 ft	Φ %6	4,925 ft	3,483 ft	2,844 ft	2,011 ft	1,422 ft	1,005 ft
4,098 ft       2,898 ft       2,366 ft       1,673 ft       1,183 ft         3,815 ft       2,698 ft       2,203 ft       1,557 ft       1,101 ft         3,304 ft       2,336 ft       1,907 ft       1,349 ft       954 ft	0	4,455 ft	3,150 ft	2,572 ft	1,819 ft	1,286 ft	909 ft
3,815 ft 2,698 ft 2,203 ft 1,557 ft 1,101 ft 3,304 ft 2,336 ft 1,907 ft 1,349 ft 954 ft	Φ %	4,098 ft	2,898 ft	2,366 ft	1,673 ft	1,183 ft	836 ft
3,304 ft 2,336 ft 1,907 ft 1,349 ft 954 ft	Φ %	3,815 ft	2,698 ft	2,203 ft	1,557 ft	1,101 ft	779 ft
	Φ %	3,304 ft	2,336 ft	1,907 ft	1,349 ft	954 ft	674 ft



### Volumetric Arcs as it Varies with Porosity Scenario Injection Rate: 13,000 BPD

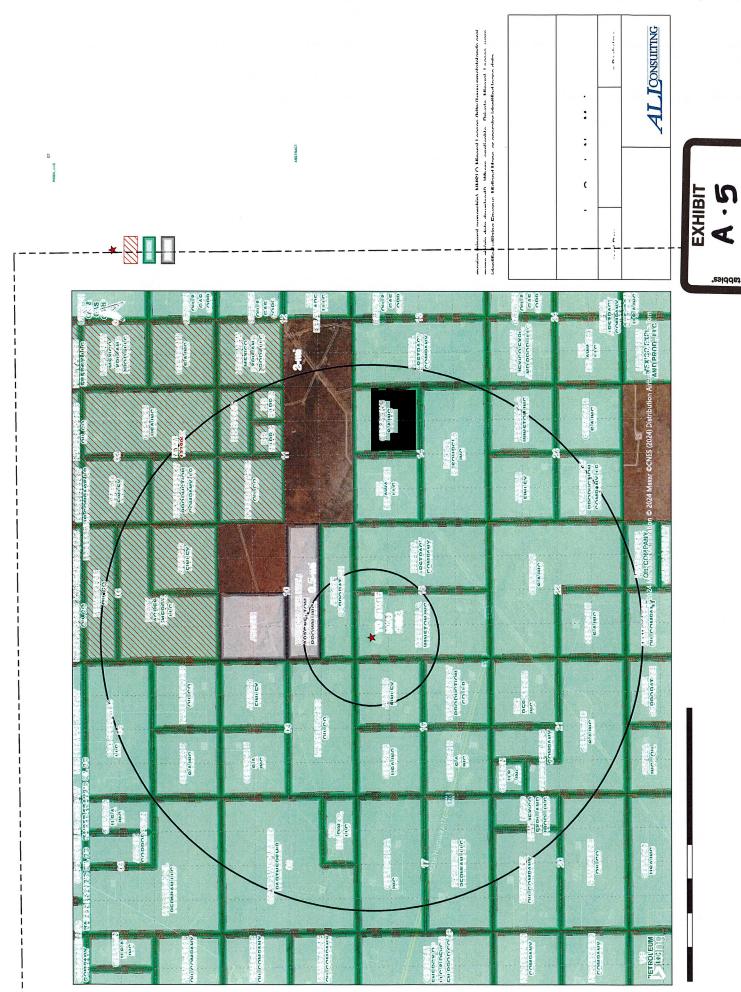
360° Arc Radius (ft)	1,748	1,719	1,453	1,282	1,159	1,066	993	860
180° Arc Radius (ft)	2,471	2,432	2,055	1,812	1,639	1,508	1,404	1,216
90° Arc Radius (ft)	3,495	3,439	2,906	2,563	2,318	2,133	1,985	1,719
45° Arc Radius (ft)	4,943	4,863	4,110	3,625	3,279	3,016	2,808	2,432
30° Arc Radius (ft)	6,054	5,956	5,034	4,439	4,016	3,694	3,439	2,978
15° Arc Radius (ft)	8,561	8,423	7,119	6,278	5,679	5,224	4,863	4,212
Porosity (%)	4%	2%	%2	%6	11%	13%	15%	20%



### Volumetric Arcs as it Varies with Porosity Scenario Injection Rate: 30,000 BPD

360° Arc Radius (ft)	2,168	2,133	1,802	1,590	1,438	1,323	1,231	1,066
180° Arc Radius (ft)	3,065	3,016	2,549	2,248	2,033	1,870	1,741	1,508
90° Arc Radius (ft)	4,335	4,265	3,605	3,179	2,876	2,645	2,463	2,133
45° Arc Radius (ft)	6,131	6,032	5,098	4,496	4,067	3,741	3,483	3,016
30° Arc Radius (ft)	7,509	7,388	6,244	5,506	4,981	4,582	4,265	3,694
15° Arc Radius (ft)	10,619	10,448	8,830	7,787	7,044	6,479	6,032	5,224
Porosity (%)	4%	2%	7%	%6	11%	13%	15%	20%







In 2024, the YO State SWD #1 operation generated approximately **\$57,500** in revenue from disposal fees and residual skim oil sales. However, total expenses, including regulatory fees, insurance, lease costs, utilities, chemical treatments, and personnel, amounted to approximately **\$191,500**, resulting in a net loss for the year. The continued financial shortfall is primarily due to the limited amount of fluid that can be disposed of at the well, restricting revenue potential. Given these constraints, **recompletion into the DMG formation appears to be the only viable option to improve financial performance and maintain operations.** 



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

June 12, 2015

**BEN THOMPSON** 

RAZ OIL & GAS

P. O. BOX 1180

**EUNICE, NM 88231** 

RE: WATER WELL CP00587

Enclosed are the results of analyses for samples received by the laboratory on 06/08/15 13:25.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at <a href="https://www.tceq.texas.gov/field/ga/lab">www.tceq.texas.gov/field/ga/lab</a> accred certif.html.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2 Haloacetic Acids (HAA-5)
Method EPA 524.2 Total Trihalomethanes (TTHM)
Method EPA 524.4 Regulated VOCs (V1, V2, V3)

Celey D. Keine

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

#### Analytical Results For:

RAZ OIL & GAS
BEN THOMPSON
P. O. BOX 1180
EUNICE NM, 88231
Fax To: NONE GIVEN

Received: 06/08/2015 Reported: 06/12/2015

Project Name: WATER WELL CP00587
Project Number: NONE GIVEN
Project Location: LEA COUNTY, NM

Sampling Date: 06/07/2015

Sampling Type: Water

Sampling Condition: \*\* (See Notes)
Sample Received By: Jodi Henson

#### Sample ID: WELL WATER (H501468-01)

Chloride, SM4500Cl-B	mg	/L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride*	92.0	4.00	06/09/2015	ND	104	104	100	0.00	
TDS 160.1	mg	/L	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
TDS*	860	5.00	06/11/2015	ND	552	105	527	1.35	

Cardinal Laboratories \*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whistoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results related only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keine

Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

#### **Notes and Definitions**

ND Analyte NOT DETECTED at or above the reporting limit

RPD Relative Percent Difference

\*\* Samples not received at proper temperature of 6°C or below.

\*\*\* Insufficient time to reach temperature.

- Chloride by SM4500Cl-B does not require samples be received at or below 6°C

Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories \*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whistoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results related only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celeg D. Freene

Celey D. Keene, Lab Director/Quality Manager

**celinquished By:** 



# CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240 (575) 393-2326 FAX (575) 393-2476

(6	575) 393-2326 FAX (5/5) 393-24/6				
Company Name:	Car Dilacas		BILL TO	ANALYSIS REQUEST	
Project Manager:	ben Thompson		P.O. #:		
Address: 0.(	). BOX 1180		Company:		
city: +1.001	CE State∜M Zip:	15283	Attn:		
Phone #: 575	Phone #: 575.399 · 245] Fax #:		Address:		
Project #:	Project Owner:		City:		
Project Name: Watev	Jater Well CPD		State: Zip:		
Project Location:	Lea (bunty,	73	Phone #:		
Sampler Name:			Fax*#:		
FOR LAB USE ONLY		MATRIX	PRESERV. SAMPLING		,
Lab I.D.	Sample I.D.	CONTAINERS ROUNDWATER VASTEWATER OIL IL LUDGE	THER: CID/BASE: CE / COOL THER:	TDS	
_ 2	Jakan Hari	# CO	 		
PLEASE NOTE: Liability and analyses. All claims including service. In no event shall Cal	PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client lot the please. All claims including those for negligence and any other cause whistoever shall be deemed waived unless made in witing and received by Cardinal within 30 days after completion of the applicable analyses. All claims including those for negligence and any other cause whistoever shall be deemed waived unless made in witing and seeked by Cardinal within 30 days after completion of the applicable analyses. All claims including without a shall be deemed waived unless made in witing and seeked by Cardinal within 30 days after completion of the applicable.	taim arising whether based in contract med waived unless made in writing and nout limitation, business interruptions, i	or tort, shall be limited to the amount paid by the client is a received by Cardinal within 30 days after completion of loss of use, or loss of profits incurred by client, its supsidess of use.	the applicable the form of the applicable disastes,	
			Maduly to advance acceptance and a second to the second to		

Sampler - UPS - Bus - Other:

Delivered By: (Circle One)

Time:

eceived By:

Phone Result: Fax Result: REMARKS:

☐ Yes

ON O

Add'l Phone #: Add'l Fax #:

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

APPLICATION OF RAZ OIL AND GAS L.L.C. TO APPROVE SALT WATER DISPOSAL WELL IN LEA COUNTY, NEW MEXICO.

**CASE NO. 25081** 

# SELF-AFFIRMED DECLARATION OF THOMAS E TOMASTIK

Thomas E. Tomastik declares as follows:

- 1. My name is Thomas E. Tomastik. I work for ALL Consulting as a Chief Geologist and Regulatory Specialist. I have been retained by Raz Oil and Gas L.L.C. ("Raz") (OGRID No. 370507).
  - 2. I have personal knowledge of the matters stated herein.
- 3. I have previously testified before the Oil Conservation Division ("Division") as an expert witness in petroleum engineering and petroleum geology and my credentials as have been accepted by the Division and made a matter of record.
  - 4. My area of responsibility includes the area of Lea County in New Mexico.
- 5. I am familiar with the application Raz filed in this matter and I am familiar with the status of the lands in the subject area.
- 6. Raz seeks authority to plug back the YO State SWD #1 well to the Delaware Mountain Group ("DMG") and authority to inject produced water into the DMG at a depth of approximately 5,540 feet to 6,104 feet.
- 7. I undertook a hydrologic evaluation related to the YO State SWD #1 well (the "Well"), which is included as Attachment 6 to Exhibit A-2. In reviewing Attachment 6, I noticed



typographical error—rather than saying Eddy County in the second paragraph, it should say Lea County.

- 8. I examined publicly available geologic and groundwater data and found no evidence of open faults or any other hydrologic connection between the disposal zone and any underground sources of drinking water ("USDW").
- 9. In my opinion, there is containment through multiple confining zones above the DMG and the USDW and there is over 4,690 feet of vertical separation between the base of the USDW and the top of the injection interval.
- 10. In addition, Raz's wellbore design will isolate any known freshwater zones and is protective of USDWs.
- 11. All of the well data and operations information required by the C-108 is included in the C-108 attached as Exhibit A-2. The proposed well design is contained in Attachment 1 and described in Section III.A, and a revised well bore design is included as Exhibit A-3 to Mr. Ticknor's testimony to show the revised the injection interval.
- 12. In my opinion, the well design will be protective of freshwater and USDWs in the area and protective of correlative rights.
- 13. Water chemistry information is included in Attachments 3 and 4 to Exhibit A-2. Based on this water chemistry analysis, in my opinion and based on my experience, there will not be a compatibility issue between the injection fluids and the fluids within the injection interval.
- 14. The estimated average surface injection pressure is expected to be approximately 720 psi. The maximum surface injection pressure will be 1,108 psi, based on the Division's guideline limiting surface injection pressures to 0.2 psi per foot of depth to the top-most injection

interval. The proposed injection volumes can be achieved without exceeding the maximum surface injection pressure.

- 15. I am familiar with the "Delaware Mountain Group Risk Area" or the "DMGRA." I am also familiar with the Avalon Shale Play Area. The DMGRA and Avalon Shale Play area were identified on a map included as Exhibit 6 within the Division's exhibits in Case Nos. 23686 and 23687.
- 16. Attached as **Exhibit B-1** is OCD's Exhibit 6, on which I have marked the approximate location of the Yo State SWD #1. As indicated on Exhibit B-1, the YO State SWD #1 is outside the boundaries of the DMGRA and outside the boundaries of the Avalon Shale Play.
- 17. I have been researching and investigating the geology of the DMG and working on DMG SWD applications in both New Mexico and Texas since 2019. This research includes reading of numerous publications on alleged DMG induced seismicity and allegations of impacts to horizontal production wells and drilling operations from existing or proposed DMG SWDs.
- 18. In my opinion, granting Raz's application would not impact hydrocarbon production from the Avalon or Bone Spring formations, because there is approximately 1,776 feet of vertical separation between the base of the proposed Bell Canyon injection interval (6100') and the top of the Bone Spring perforations (7876') in the Bell State 16 Com #1 well.
- 19. In addition, there are multiple confining intervals and shale barriers, above and below the injection interval, which help ensure safety and containment.
- 20. As demonstrated in Exhibit C-1, attached to Mr. Davis' Declaration and which I co-authored with Mr. Davis, the proposed injection interval is overlain by the Castile Evaporites, consisting of anhydrite and calcite, which will serve as the upper confining layer. Additionally, the proposed injection zone is underlain by approximately 120 feet of low porosity and

permeability zones within the lower Cherry Canyon formation which will serve as the lower confining layer, preventing downward migration of fluid into the Brushy Canyon formation and deeper formations.

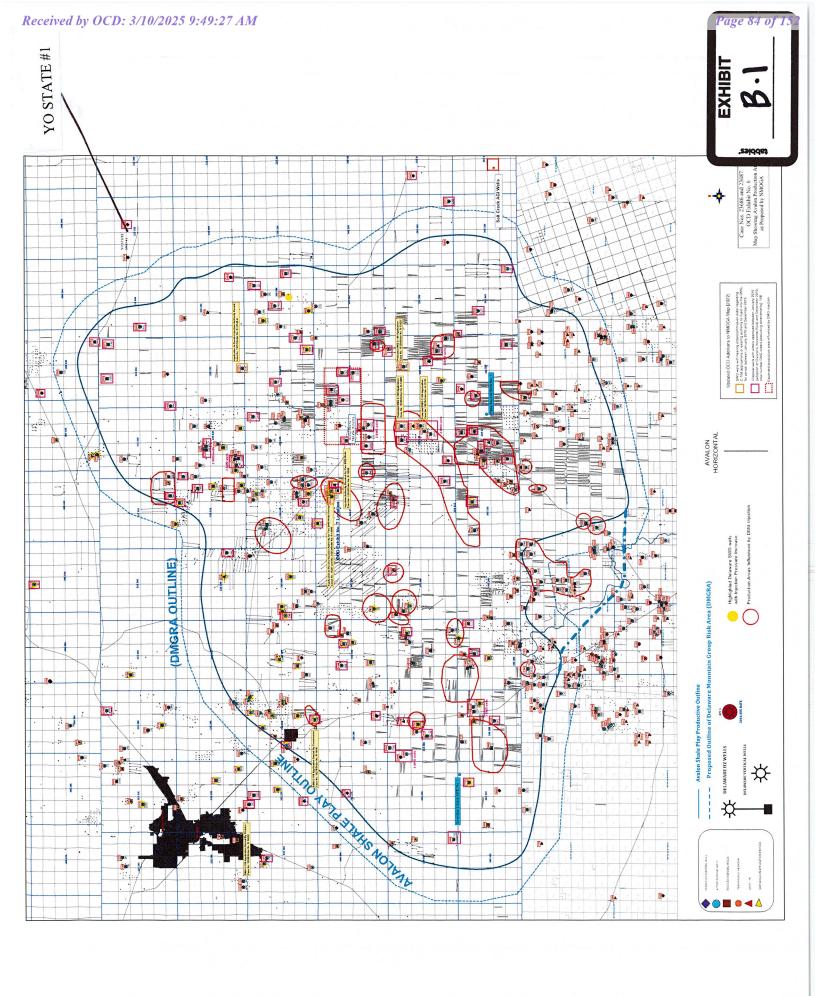
- 21. In my opinion, granting Raz's application would not lead to an increase in induced seismicity as further outlined in Mr. Davis' Declaration and in Exhibit C-1.
- 22. The attached exhibits were prepared by me, or compiled from company business records, or were prepared at my direction.
- 23. I attest under penalty of perjury under the laws of the State of New Mexico that the information provided herein is correct and complete to the best of my knowledge and belief.

[Signature page follows]

Dated: February \_6\_, 2025

Thomas E. Tomastik

Thomas E. Tomastik





# PROPOSED CONDITIONS OF APPROVAL FOR THE YO STATE SWD #1 PLUG BACK TO THE BELL CANYON FORMATION

The following proposed conditions are being submitted to satisfy New Mexico Oil Conservation Division's (NMOCD) approval of the plugging back of the YO State SWD #1 well from the Devonian to the Bell Canyon Formation of the Delaware Mountain Group.

# Isolation of the Devonian Injection Zone and Plug Back to 8,700 feet:

- 1. Once the Class II permit is issued by NMOCD, RAZ Oil and Gas will move in with a service rig and withdraw the existing injection tubing and packer set directly above the Devonian perforations and remove the injection tubing and packer from the well.
- 2. Then run into the well with a cast iron bridge plug (CIBP) with a wireline unit and set the CIBP at a depth of approximately 13,490 feet (perforations are from 13,518'-13,718') and then trip out of the well with the wireline unit back to the surface.
- 3. Trip back into the well with 2-7/8" work string and spot 30 feet of cement on top of the CIBP.
- 4. Pump spacer back to approximately 12,700 feet and spot a 500-foot plug of Class H cement inside the 7" production casing from 12,700 to 12,200 feet to cover the 7" casing shoe and back up across the top of the 5" liner.
- 5. Pump spacer back to approximately 10,200 feet and spot a 200-foot plug of Class H 14.8 pounds per gallon (ppg) cement from 10,200 feet to 10,000 feet to cover the top of the Wolfcamp Formation.
- 6. Pump spacer back to approximately 8,700 feet and withdraw 2-7/8" work string back to the surface.

#### Run New Cement Bond Log to Confirm Cement Behind the 7" Production Casing:

- 1. Run into the well with either a radial cement bond log (CBL) with lubricator so CBL can be run under pressure or utilize the Baker Hughes segmented bond log to confirm the quality of the cement sheath from approximately 8,700 feet back to approximately 5,300 feet which is directly above the 2<sup>nd</sup> DV tool and the area of good cement bond.
- 2. Based on the evaluation of the cement bond on the CBL determine if remedial cementing is necessary or even possible prior to perforating the 7" production casing.
- 3. Submit the CBL and ALL Consulting's (ALL) assessment and evaluation of the CBL to NMOCD for their review and approval on proceeding forward.
- 4. If the CBL shows the potential for performing remedial cementing operations with perforating and cement squeeze operations, ALL will submit a plan to NMOCD for approval prior to any remedial cementing operations are undertaken.

1 Exhibit B-2

#### **Remedial Cementing and Completion of Plug Back Operations:**

- 1. If remedial cementing is necessary and possible to be performed, the preliminary proposal would be to perforate lower perforations at a depth of approximately 8,690 feet with 4 shots per foot over a 6-foot zone.
- 2. Trip out wireline and perforating gun and then run back into the well with a second perforating gun to perforate from approximately 5,600 feet with 4 shots per foot over a 6-foot interval.
- 3. Run into the well with a 2-7/8" work string and tubing conveyed cement retainer and set cement retainer above the squeeze perforations.
- 4. Sting out of the cement retainer after setting it and then sting back into the cement retainer and attempt to pump and circulate fluid from approximately 8,690 to 5,600 feet.
- 5. If circulation cannot be established, then only pump and squeeze a Class H 14.8 PPG cement plug from 8,690 back to approximately 7,500 feet to cover the top of the Bone Spring limestone at 7,578 feet.
- 6. If circulation is established, then pump and squeeze a Class H 14.8 ppg cement plug from 8,690 feet back to approximately 5,600 feet.
- 7. Trip of the well and then wait approximately 72 hours to run another radial CBL to confirm remedial cementing operations. Submit a copy of the radial CBL to NMOCD. If remedial cementing operations were successful, finish plugging back the YO State SWD #1 with spacer to approximately 7,650 feet and spot a 200-foot Class H 14.8 ppg cement plug inside the 7" production casing to a depth of approximately 7,450 feet to cover the top of the Bone Spring Formation.
- 8. Then pump spacer back to approximately 6,250 feet. Run with wireline conveyed CIBP and set at a depth of approximately 6,250 feet and then trip in with work string and spot 30-foot plug of Class H 14.8 ppg cement on top of the CIBP (will want 100 feet of rat hole below the bottom perforation).

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

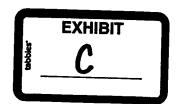
APPLICATION OF RAZ OIL AND GAS L.L.C. TO APPROVE SALT WATER DISPOSAL WELL IN LEA COUNTY, NEW MEXICO.

**CASE NO. 25081** 

## SELF-AFFIRMED DECLARATION OF REED DAVIS

Reed Davis, of lawful age and being duly sworn, declares as follows:

- 1. My name is Reed Davis. I work for ALL Consulting as a Geophysicist. I have been retained by Raz Oil and Gas L.L.C. ("Raz") (OGRID No. 370507).
  - 2. I personal knowledge of the matters stated herein.
- 3. I have previously testified before the Oil Conservation Division ("Division") as an expert witness in reservoir geology and my credentials have been accepted by the Division and made a matter of record.
  - 4. My area of responsibility includes the area of Lea County in New Mexico.
- 5. I am familiar with the application Raz filed in this matter and I am familiar with the status of the lands and geology in the subject area.
- 6. In this case, Raz seeks authority to plug back the YO State SWD #1 well (the "Well") to the Delaware Mountain Group ("DMG") and authority to inject produced water into the DMG at a depth of approximately 5,540 feet to 6,104 feet.
- 7. Exhibit C-1 provides a brief overview of the geology of this area. Based on ALL's geology study, I have concluded that the Bell Canyon and Cherry Canyon Formations of the DMG are well suited for injection because they are bounded by both an upper confining layer and a lower confining layer, which will prevent migration of the injected fluids. The Bell Canyon and Cherry Canyon Formations primarily consist of fine-grained Permian-age sandstone with interbedded



carbonate members. Several thick intervals of porous and permeable sandstones are capable of taking water are present within the Bell Canyon and Cherry Canyon Formations in this area.

- 8. As demonstrated in Exhibit C-1, the proposed injection interval is overlain by the Castile Evaporites, consisting of anhydrite and calcite, which will serve as the upper confining layer. Additionally, the proposed injection zone is underlain by approximately 120 feet of low porosity and permeability zones within the lower Cherry Canyon Formation which will serve as the lower confining layer, preventing downward migration of fluid into the Brushy Canyon Formation and deeper formations.
- 9. In my opinion, operating the Well will not impact the correlative rights of mineral owners because the proposed injection will remain within the target injection interval due to the upper and lower confining zones.
- 10. I also prepared a statement regarding seismicity, which is included in Exhibit C-1. Based on my study, in my opinion, the potential for the Well to cause injection-induced seismicity is expected to be minimal because (1) the presence of numerous confining layers above and below the proposed injection interval, (2) the significant vertical distance between the proposed injection interval and the nearest identified fault, and (3) the lack of historic seismicity within the proposed Delaware Mountain Group injection interval, or other shallow formations. Additionally, the location of the Well is monitored for seismic activity by both the United States Geological Survey (USGS) and New Mexico Tech Seismological Observatory (NMTSO) public seismic networks.
- 11. In my opinion, the granting of Raz's application is in the interests of conservation and the prevention of waste.
- 12. The attached exhibits were prepared by me, or compiled from company business records, or were prepared at my direction.

13. I attest under penalty of perjury under the laws of the State of New Mexico that the information provided herein is correct and complete to the best of my knowledge and belief.

[Signature page follows]

Dated: February \_\_\_, 2025

Reed Davis



February 24, 2025

PN 1843.SWD.02

Mr. Phillip Goetze, P.G. NM EMNRD – Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87505

Subject: Raz Oil and Gas LLC

YO State SWD #1 - Seismic Potential Letter

Dear Mr. Goetze,

At the request of Raz Oil and Gas LLC (Raz), ALL Consulting, LLC (ALL) has assessed the potential injection-induced seismicity risks in the vicinity of Raz's YO State SWD #1, a saltwater disposal (SWD) facility in Lea County, New Mexico, and summarized the findings in this letter. This assessment used publicly available data to identify the proximity and characteristics of seismic events and known faults to evaluate the potential for the operation of the YO State SWD #1 to contribute to seismic activity in the area.

# **Geologic Evaluation**

The YO State SWD #1 is requesting a permit to inject into the Bell Canyon Formation of the Delaware Mountain Group at a depth of 5,540 – 6,104 feet below ground surface (bgs). The Permian Delaware Mountain Group consists of fine-grained Permian age sandstones with interbedded carbonate members. The proposed injection interval is overlain by the Castile evaporites, consisting of anhydrites, salts, and low porosity carbonate rocks, which will act as the upper confining layer (see **Attachment 1**). Additionally, the proposed injection interval is underlain by approximately 120 feet of low porosity and permeability zones within the lower Bell Canyon Formation which will act as the lower confining layer. A stratigraphic chart depicting the geologic setting is included as **Figure 1**.

<sup>&</sup>lt;sup>1</sup> Yang, K.-M., & Dorobek, S. L. (1995). The Permian Basin of west Texas and New Mexico: Tectonic history of a "composite" Foreland Basin and its effects on stratigraphic development. *Stratigraphic Evolution of Foreland Basins*, 149–174. https://doi.org/10.2110/pec.95.52.0149

#### Seismic Events and Fault Data

A review of United States Geological Survey (USGS) and New Mexico Tech Seismological Observatory (NMTSO) earthquake catalogues determined that the closest recorded seismic event was a M1.23 that occurred on June 15, 2024, and was located approximately 0.19 miles south of the YO State SWD #1 (see Attachment 2). Additionally, this seismic event was recorded at a depth of 11.54km (37,861'), approximately 32,000 feet below the base of the proposed injection interval. Per the USGS earthquake catalog, one (1) seismic event M2.5 or greater has been recorded within 10 miles of the YO State SWD #1.2 The YO State SWD #1 was previously completed as a Devonian SWD and is currently active. Raz is requesting to plug back from the Devonian and recomplete the well into the Bell Canyon Formation of the Delaware Mountain Group, which is approximately 7,414' above the previous disposal zone in the Devonian.

Fault data from United States Geological Survey (USGS) and the Texas Bureau of Economic Geology (BEG)<sup>3</sup> indicates that the closest known shallow fault is located approximately 3.27 miles east of the YO State SWD #1 (see

Figure 1 – Delaware Basin Stratigraphic Chart (Adapted from Yang and Dorobek 1995)

SYSTEM	SERIES/ STAGE		NTRAL BASIN DELAWAR PLATFORM BASIN		,
	OCHOAN		LAKE TLER ADO	DEWEY LAKE RUSTLER SALADO CASTILE  DELAWARE MT GROU BELL CANYON CHERRY CANYON BRUSHY CANYON BRUSHY CANYON	
PERMIAN	GUADALUPIAN	SEVEN	NDRES		
	LEONARDIAN	CLEAR			
	WOLFCAMPIAN	WOLF	CAMP	WOL	FCAMP
_	VIRGILIAN	CIS	co	CIS	SCO
	MISSOURIAN	CAN	YON	CAN	YON
PENNSYLVANIAN	DESMOINESIAN	STR	AWN	STRAWN	
	ATOKAN	ATOKA	BEND	ATOKA	—BEND——
	MORROWAN	(ABSENT)		MORROW	
MISSISSIPPIAN	CHESTERIAN MERAMECIAN OSAGEAN	CHESTER MERAMEC OSAGE	BARNETT	CHESTER MERAMEC OSAGE	BARNETT"
	KINDERHOOKIAN	KINDE			RHOOK
DEVONIAN			OFORD ONIAN		DFORD DNIAN
SILURIAN			N SHALE ELMAN		SILURIAN ELMAN
	UPPER	MONTOYA		SYLVAN MONTOYA	
ORDOVICIAN	MIDDLE	SIMPSON		SIMPSON	
	LOWER	ELLEN	BURGER	ELLEN	BURGER
CAMBRIAN	UPPER	CAME	BRIAN	CAM	BRIAN
PRECAMBRIAN					

**Attachment 3**). This identified fault is known to penetrate the Canyon, Cisco, and Wolfcamp Formations, which are at least 5,500 feet below the proposed injection interval per nearby well logs and completion reports. A map of the seismic events and faults within 10 miles of the YO State SWD #1 is included as **Attachment 3**.

#### Seismic Potential Evaluation

Experience in evaluating induced seismic events indicates that most injection-induced seismicity throughout the U.S. (e.g., Oklahoma, Ohio, Texas, New Mexico, and Colorado) occurs as a result of injection into Precambrian basement rock, into overlying formations that are in hydraulic communication with the Precambrian basement rock, or as a result of injection near critically stressed and optimally oriented faults. Seismicity at basement depths occurs because

<sup>&</sup>lt;sup>2</sup> USGS Earthquake Catalog. U.S. Geological Survey. (n.d.). https://earthquake.usgs.gov/earthquakes/search/

<sup>&</sup>lt;sup>3</sup> Horne E. A. Hennings P. H., and Zahm C. K. 2021. Basement structure of the Delaware Basin, in The Geologic Basement of Texas: A Volume in Honor of Peter Flawn, Callahan O. A., and Eichubl P., The University of Texas at Austin, Bureau of Economic Geology.

critically stressed faults generally originate in crystalline basement rock and may also extend into overlying sedimentary formations. <sup>4</sup>

Injection into either the Precambrian basement rock or its overlying formations that are hydraulically connected to the basement rock through faulting or fracture networks can increase the pore pressure and may lead to the fault slipping, resulting in a seismic event.<sup>4</sup> As such, the vertical distance between the injection formation and Precambrian basement rock and the presence or lack of faulting within the injection interval are major considerations when determining the risk of injection-induced seismicity.

The one (1) USGS recorded seismic event M2.5 or greater within 10 miles of the YO State SWD #1 was a M2.9 which occurred on December 14, 2021, at a recorded depth of 4.0 km (13,123'). This recorded depth would place the event within the lower Mississippian Formation just above the Woodford Shale. There is approximately 7,019 feet of vertical separation between the base of the proposed Delaware Mountain Group injection interval and the recorded seismic event. USGS lists the depth uncertainty for this event at 3.4 km and the surface location uncertainty at 1.3 km.

# **Depth to Precambrian Basement**

Geophysical data from nearby well records, aeromagnetic surveys, and gravity surveys indicates the top of the Precambrian basement to be approximately 15,000 feet bgs at the YO State SWD #1, or nearly 9,000 feet below the proposed injection interval.<sup>3</sup> There are insufficient Precambrian basement penetrations and/or public well data regarding Precambrian basement depth to generate an accurate structural contour map of the Precambrian basement in the vicinity of the YO State SWD #1.

# **Formation Parting Pressure**

Class II SWDs in New Mexico are administratively permitted with a maximum pressure gradient of 0.2 psi/ft. Review of New Mexico Oil Conservation Division (NMOCD) Order IPI-543 from NGL Waste Service's Striker 4 SWD #1 (30-025-49364), located approximately 20 miles southwest of the YO State SWD #1, determined the fracture gradient of the Bell Canyon injection interval is approximately 0.36 psi/ft based on approved step-rate tests. Typical SWD permitting standards in New Mexico would indicate that formation parting pressure will not be exceeded by the YO State SWD #1.

## Conclusion

As experts on the issue of induced seismicity, seismic monitoring, and mitigation, it is our expert opinion that the potential for the YO State SWD #1 to cause injection-induced seismicity is expected to be minimal, at best. This conclusion assumes the YO State SWD #1 will be operated under formation parting pressure at the regulated 0.2 psi per foot and is based on (1) the presence of numerous confining layers above and below the proposed injection interval, (2) the significant

<sup>&</sup>lt;sup>4</sup> Ground Water Protection Council and Interstate Oil and Gas Compact Commission.

Potential Injection-Induced Seismicity Associated with Oil & Gas Development: A Primer on Technical and Regulatory Considerations Informing Risk Management and Mitigation. 2015. 141 pages.

vertical distance between the proposed injection interval and the nearest identified shallow fault, and (3) the lack of historic seismicity within the proposed Bell Canyon Formation of the Delaware Mountain Group injection interval, or other shallow formations.

Sincerely,

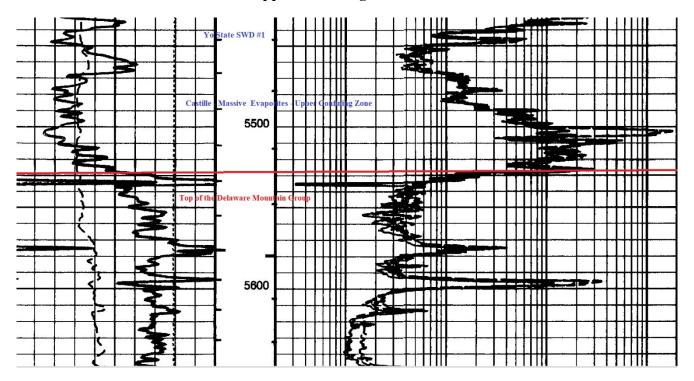
**ALL Consulting** 

Reed Davis Geophysicist Tom Tomastik Chief Geologist

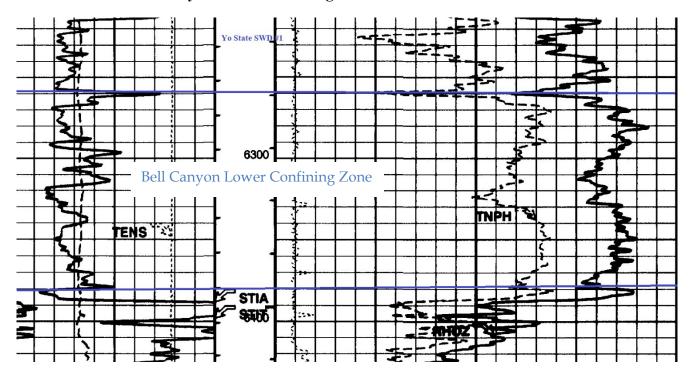
Tom Tomastik

Attachment 1 Confining Zones

# **Castile Formation Upper Confining Zone from YO State SWD #1**



# **Bell Canyon Lower Confining Zone from YO State SWD #1**



YO State SWD #1 - Lower Confinement					
Depth (feet)	Porosity Reading (%)				
6,260	12				
6,270	8.5				
6,280	8.5				
6,290	9				
6,300	10.5				
6,310	11				
6,320	12				
6,330	10.5				
6,340	9				
6,350	9				
6,360	9				
6,370	10				
6,380	10.5				

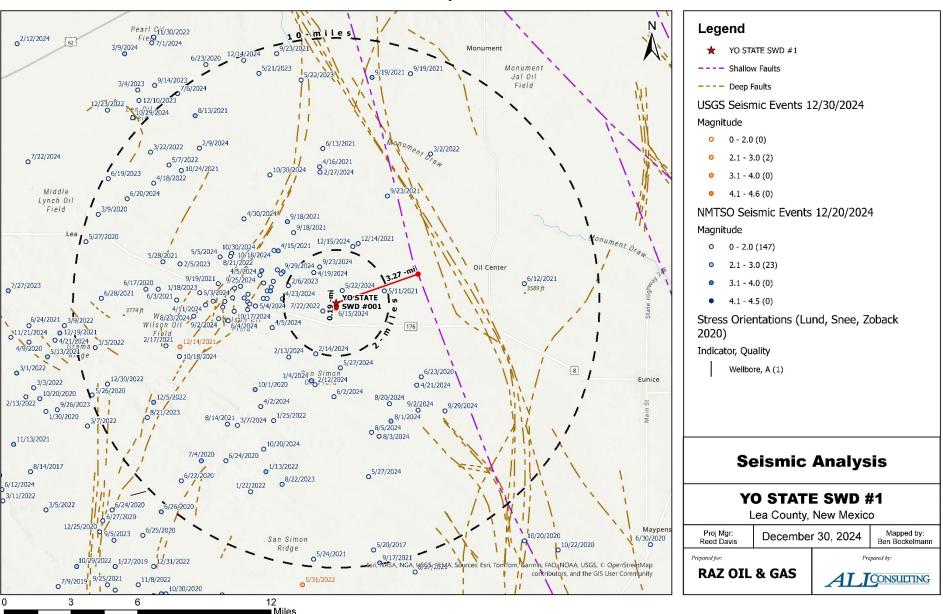
> Attachment 2 USGS Event List

# USGS Seismic Events ≥ M2.5 Within 10-Miles of YO State SWD #1

Date	Magnitude (M)	Depth (km)	Depth Error (km)	Latitude	Longitude
12/14/2021	2.9	4.04	3.4	32.4604	-103.4628

> Attachment 3 Seismic Event Map

## **YO State SWD #1 Nearby Seismic Events and Faults**



Page 12

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

APPLICATION OF RAZ OIL AND GAS L.L.C. TO APPROVE SALT WATER DISPOSAL WELL IN LEA COUNTY, NEW MEXICO.

**CASE NO. 25081** 

## SELF-AFFIRMED DECLARATION OF DEANA M. BENNETT

Deana M. Bennett, attorney in fact and authorized representative of Raz Oil and Gas LLC, the Applicant herein, declares as follows:

- 1) The above-referenced Application was provided under notice letter, dated December 16, 2024, attached hereto, labeled Exhibit D.1.
- 2) Exhibit D.2 is the mailing list, which show the notice letters were delivered to the USPS for mailing December 16, 2024.
- 3) Exhibit D.3 is the certified mailing tracking information, which is automatically compiled by CertifiedPro, the software Modrall uses to track the mailings. This spreadsheet shows the names and addresses of the parties to whom notice was sent and the status of the mailing.
- 4) Exhibit D.4 is the Affidavit of Publication from the Hobbs Daily News-Sun, confirming that notice of the January 9, 2025 hearing was published on December 19, 2024.
- 5) I attest under penalty of perjury under the laws of the State of New Mexico that the information provided herein is correct and complete to the best of my knowledge and belief.

Dated: February 6, 2025

Record H. Bennert

Deana M. Bennett



December 16, 2024

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Deana M. Bennett 505.848.1834 dmb@modrall.com

Re: APPLICATION OF RAZ OIL AND GAS L.L.C. TO APPROVE SALT WATER DISPOSAL WELL IN LEA COUNTY, NEW MEXICO

**CASE NO. 25081** 

TO: AFFECTED PARTIES

This letter is to advise you that Raz Oil and Gas LLC ("Raz Oil") has filed the enclosed application.

In Case No. 25081, Raz Oil seeks an order authorizing applicant to plug back the YO State SWD #1 well to the Delaware Mountain Group and authorizing applicant to inject produced water into the Delaware Mountain Group at a depth of approximate 5,540 feet to 6,930 feet. Applicant currently operates the YO State SWD #1 (API 30-025-38162), at a surface location 660' from the North line and 840' from the West line, Lot D, Section 15, Township 21 South, Range 35 East, NMPM, Lea County, New Mexico. Applicant further requests that the Division approve a maximum daily injection rate for the well of 20,000 bbls per day. Said area is located approximately 12.24 miles northwest of Eunice, New Mexico.

The hearing is set for January 9, 2025 beginning at 9:00 a.m. The hearing will be conducted in a hybrid fashion, both in-person at the Energy, Minerals, Natural Resources Department, Wendell Chino Building, Pecos Hall, 1220 South St. Francis Drive, 1st Floor, Santa Fe, NM 87505 and via the WebEx virtual meeting platform. To participate in the electronic hearing, see the instructions posted on the docket for the hearing date: <a href="https://www.emnrd.nm.gov/ocd/hearing-info/">https://www.emnrd.nm.gov/ocd/hearing-info/</a>.

As a party who may be affected by this application, we are notifying you of your right to appear at the hearing and participate in this case, including the right to present evidence either in support of or in opposition to the

EXHIBIT

D. 1

Modrall Sperling Roehl Harris & Sisk P.A.

500 Fourth Street NW Suite 1000 Albuquerque, New Mexico 87102

PO Box 2168 Albuquerque, New Mexico 87103-2168

Tel: 505.848.1800 www.modrall.com Page 2

application. Failure to appear at the hearing may preclude you from any involvement in this case at a later date.

You are further notified that if you desire to appear in this case, then you are requested to file a Pre-Hearing Statement with the Division at least four business days in advance of a scheduled hearing before the Division or the Commission, but in no event later than 5:00 p.m. mountain time, on the Thursday preceding the scheduled hearing date, with a copy delivered to the undersigned.

Sincerely,

Deana M. Bennett

Attorney for Applicant

Received by OCD: 12/10/2024 2:38:31 PM

Page 1 of 40:

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

APPLICATION OF RAZ OIL AND GAS L.L.C. TO APPROVE SALT WATER DISPOSAL WELL IN LEA COUNTY, NEW MEXICO.

CASE NO. 25081

#### APPLICATION

Raz Oil and Gas L.L.C. ("Raz"), OGRID No. 370507, through its undersigned attorneys, hereby submits this application to the Oil Conservation Division pursuant to the provisions of NMSA 1978, § 70-2-12, Rule No. 19.15.26, and Rule 19.15.4.8 for an order authorizing Raz to plug back the YO State SWD #1 well to the Delaware Mountain Group and authorizing injection from the YO State SWD #1 well into the Delaware Mountain Group. In support of this application, Raz states as follows:

- (1) Raz currently operates the YO State SWD #1 (API 30-025-38162) pursuant to Division Order SWD-1594, at a surface location 660' from the North line and 840' from the West line, Lot D, Section 15, Township 21 South, Range 35 East, NMPM, Lea County, New Mexico. Raz currently injects produced water into the Devonian formation.
- (2) Raz seeks authority to plug back the YO State SWD #1 well to the Delaware Mountain Group and authority to inject produced water into the Delaware Mountain Group at a depth of approximately 5,540 feet to 6,930 feet.
- (3) Raz requests that the Division approve a maximum daily injection rate for the well of 20,000 bbls per day.
  - (4) Raz requests approval of a maximum injection pressure of 1,108 psi for the well.

Released to Imaging: 12/12/2024 11:22:28 AM

Received by OCD: 12/10/2024 2:38:31 PM

Page 2 of 40

- A proposed C-108 for the subject well is attached hereto as Attachment A. Raz (5)previously submitted a C-108 for administrative approval in October 2023. Raz reviewed the C-108 in preparation for submitting this application and made one revision to the ownership map otherwise the C-108 as submitted in October 2023 required no changes and is still accurate.
- (6)Notice of the previously submitted administrative application was given as shown in the attached C-108. Counsel for Raz will provide notice of this hearing application as required by the Division's regulations.
- (7) The granting of this application will prevent waste and will protect correlative rights.

WHEREFORE, Raz requests that this application be set for hearing before an Examiner of the Oil Conservation Division on January 9, 2025; and that after notice and hearing, the Division enter its order approving this application.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS & SISK, P.A.

Earl E. DeBrine, Jr.

Deana M. Bennett

Yarithza Peña

Post Office Box 2168

500 Fourth Street NW, Suite 1000

Albuquerque, New Mexico 87103-2168

Telephone: 505.848.1800

edebrine@modrall.com

deana.bennett@modrall.com

yarithza.pena@modrall.com

Attorneys for Applicant

Page 3 of 40

CASE NO. 25081: Application of Raz Oil and Gas L.L.C. for approval of a salt water disposal well in Lea County, New Mexico. Applicant seeks an order authorizing applicant to plug back the YO State SWD #1 well to the Delaware Mountain Group and authorizing applicant to inject produced water into the Delaware Mountain Group at a depth of approximate 5,540 feet to 6,930 feet. Applicant currently operates the YO State SWD #1 (API 30-025-38162), at a surface location 660' from the North line and 840' from the West line, Lot D, Section 15, Township 21 South, Range 35 East, NMPM, Lea County, New Mexico. Applicant further requests that the Division approve a maximum daily injection rate for the well of 20,000 bbls per day. Said area is located approximately 12.24 miles northwest of Eunice, New Mexico.

Page 4 of 40

				Revised March 23, 2017
RECEIVED:	REVIEWER:	TYPE:	APP NO:	
	- Geolog	ASOVĒTHISTASLE FOROCO CO OIL CONSERV ical & Engineerir irancis Drive, Sar	<b>VATION DIVISIO</b> ng Bureau –	
		RATIVE APPLICA		
IHI2	CHECKLIST IS MANDATORY FOR A REGULATIONS WHICH F	all administrative appli REQUIRE PROCESSING AT T		
pplicant: Raz Oil				GRID Number: 370507
ell Name: YOS			<del></del>	PI: 30-025-38162
ool: SWD; DELAWA	LRE		Po	ool Code: 96100
SUBMIT ACCUI	RATE AND COMPLETE IN	NFORMATION REQ INDICATED BE		ESS THE TYPE OF APPLICATION
A. Location	LICATION: Check those n – Spacing Unit – Simu ]NSL	ultaneous Dedi <u>c</u> at	-	□sd
[1] Cor [ [11] Inje	ection – Disposal – Pres	PLC PC Sure Increase – En	JEOR □PPR	FOR OCD ONLY
A. Offse B. Royc C. App D. Notii E. Notii F. Surfa G. For a	et operators or lease ha alty, overriding royalty lication requires publis fication and/or concur fication and/or concur ace owner all of the above, proof notice required	olders owners, revenue of hed notice rrent approval by rrent approval by	owners SLO BLM	Notice Complete  Application Content Complete  Hached, and/or,
administrativ understand	ON: I hereby certify that we approval is accurate that no action will be the are submitted to the Expression.	e and complete to aken on this appl	o the best of my	this application for y knowledge. I also required information and
	Note: Statement must be com	pleted by an individual v	with managerial and/	or supervisory capacity.
			12/10/2024	
Joshua Ticknor			Date	
Print or Type Nam	е			
/			(580) 916-212	
Osta Tish			Phone Nui	mber
	VAN.			
Josh Tick	nor E	XHIBIT	jticknor@al	l-llc.com

Page 5 of 40

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, New Mexico 87505 FORM C-108 Revised June 10, 2003

#### APPLICATION FOR AUTHORIZATION TO INJECT

I.	PURPOSE: Secondary Recovery Pressure Maintenance X Disposal Storage Application qualifies for administrative approval? X Yes No
II.	OPERATOR: Raz Oil and Gas L.L.C.
	ADDRESS: P.O. Box 1180, Eunice, NM 88321
	CONTACT PARTY: Joshua Ticknor PHONE: (580) 916-2126
Ш.	WELL DATA: Complete the data required on the reverse side of this form for each well proposed for injection.  Additional sheets may be attached if necessary.
IV.	Is this an expansion of an existing project? Yes X No If yes, give the Division order number authorizing the project:   X No   Injection authorized under Order SWD-1594
٧.	Attach a map that identifies all wells and leases within two miles of any proposed injection well with a one-half mile radius circle drawn around each proposed injection well. This circle identifies the well's area of review.
VI.	Attach a tabulation of data on all wells of public record within the area of review which penetrate the proposed injection zone. Such data shall include a description of each well's type, construction, date drilled, location, depth, record of completion, and a schematic of any plugged well illustrating all plugging detail.
VII.	Attach data on the proposed operation, including:
	<ol> <li>Proposed average and maximum daily rate and volume of fluids to be injected;</li> <li>Whether the system is open or closed;</li> <li>Proposed average and maximum injection pressure;</li> <li>Sources and an appropriate analysis of injection fluid and compatibility with the receiving formation if other than reinjected produced water; and,</li> <li>If injection is for disposal purposes into a zone not productive of oil or gas at or within one mile of the proposed well, attach a chemical analysis of the disposal zone formation water (may be measured or inferred from existing literature, studies, nearby wells, etc.).</li> </ol>
*VIII	Attach appropriate geologic data on the injection zone including appropriate lithologic detail, geologic name, thickness, and depth. Give the geologic name, and depth to bottom of all underground sources of drinking water (aquifers containing waters with total dissolved solids concentrations of 10,000 mg/l or less) overlying the proposed injection zone as well as any such sources known to be immediately underlying the injection interval.
IX.	Describe the proposed stimulation program, if any.
*X.	Attach appropriate logging and test data on the well. (If well logs have been filed with the Division, they need not be resubmitted).
*Xl.	Attach a chemical analysis of fresh water from two or more fresh water wells (if available and producing) within one mile of any injection or disposal well showing location of wells and dates samples were taken.
XII.	Applicants for disposal wells must make an affirmative statement that they have examined available geologic and engineering data and find no evidence of open faults or any other hydrologic connection between the disposal zone and any underground sources of drinking water.
XIII.	Applicants must complete the "Proof of Notice" section on the reverse side of this form.
XIV.	Certification: I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.
	NAME: Joshua Ticknor TITLE: Consultant / Project Manager
	SIGNATURE: Dosh Ticknor DATE: 12/10/2024
*	E-MAIL ADDRESS: jticknor@all-lic.com  If the information required under Sections VI, VIII, X, and XI above has been previously submitted, it need not be resubmitted. Please show the date and circumstances of the earlier submittal:
DIST	FRIBUTION: File Electronically Via OCD Permitting

Page 6 of 40

Side 2

#### III. WELL DATA

- A. The following well data must be submitted for each injection well covered by this application. The data must be both in tabular and schematic form and shall include:
  - (1) Lease name; Well No.; Location by Section, Township and Range; and footage location within the section.
  - (2) Each casing string used with its size, setting depth, sacks of cement used, hole size, top of cement, and how such top was determined.
  - (3) A description of the tubing to be used including its size, lining material, and setting depth.
  - (4) The name, model, and setting depth of the packer used or a description of any other seal system or assembly used.

Division District Offices have supplies of Well Data Sheets which may be used or which may be used as models for this purpose. Applicants for several identical wells may submit a "typical data sheet" rather than submitting the data for each well.

- B. The following must be submitted for each injection well covered by this application. All items must be addressed for the initial well. Responses for additional wells need be shown only when different. Information shown on schematics need not be repeated.
  - (1) The name of the injection formation and, if applicable, the field or pool name.
  - (2) The injection interval and whether it is perforated or open-hole.
  - (3) State if the well was drilled for injection or, if not, the original purpose of the well.
  - (4) Give the depths of any other perforated intervals and detail on the sacks of cement or bridge plugs used to seal off such perforations.
  - (5) Give the depth to and the name of the next higher and next lower oil or gas zone in the area of the well, if any.

#### XIV. PROOF OF NOTICE

All applicants must furnish proof that a copy of the application has been furnished, by certified or registered mail, to the owner of the surface of the land on which the well is to be located and to each leasehold operator within one-half mile of the well location.

Where an application is subject to administrative approval, a proof of publication must be submitted. Such proof shall consist of a copy of the legal advertisement which was published in the county in which the well is located. The contents of such advertisement must include:

- (1) The name, address, phone number, and contact party for the applicant;
- (2) The intended purpose of the injection well; with the exact location of single wells or the Section, Township, and Range location of multiple wells;
- (3) The formation name and depth with expected maximum injection rates and pressures; and,
- (4) A notation that interested parties must file objections or requests for hearing with the Oil Conservation Division, 1220 South St. Francis Dr., Santa Fe, New Mexico 87505, within 15 days.

NO ACTION WILL BE TAKEN ON THE APPLICATION UNTIL PROPER PROOF OF NOTICE HAS BEEN SUBMITTED.

NOTICE: Surface owners or offset operators must file any objections or requests for hearing of administrative applications within 15 days from the date this application was mailed to them.

Page 7 of 40

Application for Authorization to Inject

Well Name: YO State SWD #1

API: 30-025-38162

#### III - Well Data (The Wellbore Diagram is included as Attachment 1)

A

#### (1) General Well Information:

Operator: Raz Oil and Gas L.L.C. (OGRID No. 370507) Lease Name & Well Number: YO State SWD #1 Location Footage Calls: 660 FNL & 840 FWL Legal Location: Lot D, S15 T21S R35E

Ground Elevation: 3,587'

Proposed Injection Interval: 5,540' - 6,930'

County: Lea

#### (2) Casing Information:

Туре	Hole Size	Casing Size	Casing Weight	Setting Depth	Sacks of Cement	Estimated TOC	Method Determined
Surface Casing	17-1/2"	13-3/8"	48 lb/ft	850'	750	Surface	Circulation
Intermediate Casing	12-1/2"	9-5/8"	40 lb/ft	5,420'	1,900	Surface	Circulation
Production Casing	8-3/4"	7"	26 lb/ft	12,536'	1,605	Surface	CBL
Liner	6-1/8"	5"	15 lb/ft	12,273' - 13,962'	105	12,662	CBL

DV Tools set on 7" casing at: 4,166', 5,335', and 9,797'

#### (3) Tubing Information:

4.5" (11.6 lb/ft) ICP L80 or N80 injection tubing with setting depth of 5,520'.

(4) Packer Information: Baker Hughes Hornet or equivalent packer set at 5,520'.

В.

(1) Injection Formation Name: Delaware

Pool Name: SWD; Delaware

Pool Code: 96100

- (2) Injection Interval: Perforated injection between 5,540' 6,930'
- (3) Drilling Purpose: Plug back for saltwater disposal in Delaware Mountain Group.
- (4) Other Perforated Intervals: Perforations from 13,518′ 13,718′ and open hole from 13,962′ 14,347′ are currently being utilized to inject into the Devonian Formation. These Perforations will be properly plugged and abandoned during the plug back of the YO State SWD #1 into a Delaware Mountain Group injection well.
- (5) Overlying Oil and Gas Zones: Below are the approximate formation tops for known oil and gas producing zones in the area.
  - Yates (3,680')

**Underlying Oil and Gas Zones:** Below are the approximate formation tops for known oil and gas producing zones in the area.

- Bone Spring (7,578')
- Wolfcamp (10,156')
- Morrow (11,669')

Page 8 of 40 :

Application for Authorization to Inject

Well Name: YO State SWD #1

API: 30-025-38162

#### V - Well and Lease Maps

The following maps and documents are included in Attachment 2:

- 2-mile Oil & Gas Well Map
- 1/2-Mile Well Detail List
- Penetrating Wellbore Diagram (Plugged Wells)
- 2-Mile Lease Map
- 2-Mile Mineral Ownership Map
- 2-Mile Surface Ownership Map
- Potash Lease Map

#### VI - AOR Well List

A list of the wells within the 1/2-mile AOR is included in Attachment 2.

There is one (1) well within the 1/2-mile AOR which penetrates the injection zone. This well has been properly cased, cemented, and plugged to isolate the injection zone. A wellbore diagram, casing information, and plugging details for this well is also included in *Attachment 2*.

#### VII - Proposed Operation

- (1) Proposed Maximum Injection Rate: 20,000 bpd Proposed Average Injection Rate: 13,000 bpd
- (2) A closed-loop system will be used.
- (3) Proposed Maximum Injection Pressure: 1,108 psi (surface)
  Proposed Average Injection Pressure: approximately 720 psi (surface)
- (4) Source Water Analysis: It is expected that the injectate will consist of produced water from production wells completed in the Yates, Bone Spring, and Morrow formations. Analysis of water from these formations is included as **Attachment 3**.
- (5) Injection Formation Water Analysis: The proposed SWD will be injecting water into the Delaware Mountain Group which is a non-productive zone known to be compatible with formation water from the Yates, Bone Spring, and Morrow formations. Water analyses from the Delaware formation in the area are included as **Attachment 4**.

#### VIII – Geologic Description

The proposed injection interval includes the Delaware Mountain Group from 5,540 to 6,930 feet. This formation consists of fine-grained Permian age sandstones with interbedded siltstones. Several thick intervals of porous and permeable sandstones capable of taking water are present within the Delaware Mountain Group in the area.

The base of the USDW is at a depth of approximately 850 feet. Water well depth in the area is approximately 150 feet below the ground surface.

Page 9 of 40

**Application for Authorization to Inject** 

Well Name: YO State SWD #1

API: 30-025-38162

#### IX - Proposed Stimulation Program

A small cleanup acid job may be used to treat the new perforations in the Delaware Mountain Group. However, no other formation stimulation is currently planned.

#### X - Logging and Test Data

Logs will be submitted to the Division upon completion of the well.

#### XI – Fresh Groundwater Samples

Based on a review of data from the New Mexico Office of the State Engineer, one (1) water well is located within 1-mile of the proposed SWD location. This water well was sampled on June 7, 2015.

A water well map, details of the water well within 1-mile, and the associated water analyses are included in *Attachment 5*.

#### XII - No Hydrologic Connection Statement

No faulting is present in the area that would provide a hydrologic connection between the injection interval and overlying USDWs. Additionally, the casing program has been designed to ensure there will be no hydrologic connection between the injection interval and overlying USDWs.

A signed No Hydrologic Connection Statement is included as Attachment 6.

#### XIII - Proof of Notice

A Public Notice was filed with the Hobbs News-Sun newspaper and an affidavit is included in **Attachment 7**.

A copy of the application was mailed to the OCD district office, landowner, and all identified affected parties within 1/2-mile of the proposed SWD location. A list of the recipients, as well as delivery confirmations, are included in **Attachment 7**.

Page 10 of 40:

# **Attachments**

#### Attachment 1:

- C-102
- As-Built Wellbore Diagram
- Proposed Recompletion Wellbore Diagram
- Packer Diagram

#### Attachment 2: Area of Review Information:

- 2-Mile Oil & Gas Well Map
- 1/2-Mile Well Detail List
- Penetrating Wellbore Diagram (Plugged Wells)
- 2-Mile Lease Map
- 2-Mile Mineral Ownership Map
- 2-Mile Surface Ownership Map
- Potash Lease Map

#### **Attachment 3:** Source Water Analyses

Attachment 4: Injection Formation Water Analyses

Attachment 5: Water Well Map and Well Data

- Water Well Map
- Well Data

Attachment 6: No Hydrologic Connection Statement

Attachment 7: Public Notice Affidavit and Notice of Application Confirmations

Page 11 of 40

#### Attachment 1

- C-102
- As-Built Wellbore Diagram
- Proposed Recompletion Wellbore Diagram
- Packer Diagram

Page 12 of 40

District I 1925 N. Franch Dr., Hobbs, NM 88240 Phone (575) 393-6161 Fax (575) 393-0720 Dispet II 811 S. First St., Artesta, SM 88210 Phone (575) 748-1283 Fax (575) 748-9720 District 131 Phone (505) 134-6178 Fax (505) 134-6170 Disma Ly 1220 S. St. Francis Dr., Sania Fe, NM 87505 Phone (505) 476-3460 Fax (505) 476-3402

State of New Mexico

Form C-102

Energy, Minerals & Natural Resources Department

Revised August 1, 2011 Submit one copy to appropriate

OIL CONSERVATION DIVISION

DEC 1 6 2015

1220 South St. Francis Dr.

District Office

Santa Fe, NM 87505

MENDED REPORT RECEIVED

WELL LOCATION AND ACREAGE DEDICATION PLAT

<sup>1</sup> API Number	2 Pool Cade	<sup>1</sup> Pool Name	
30-025-38162	97996	SWD; Cherry Canyon - Bru	shy Canyon
Property Code	Property N	iame	*Well Number
315024	YO State S	WD -	001
OGRID No.	* Operator N	sure.	* Elevation
370507	Raz Oil and Ga	15, LLC	3587

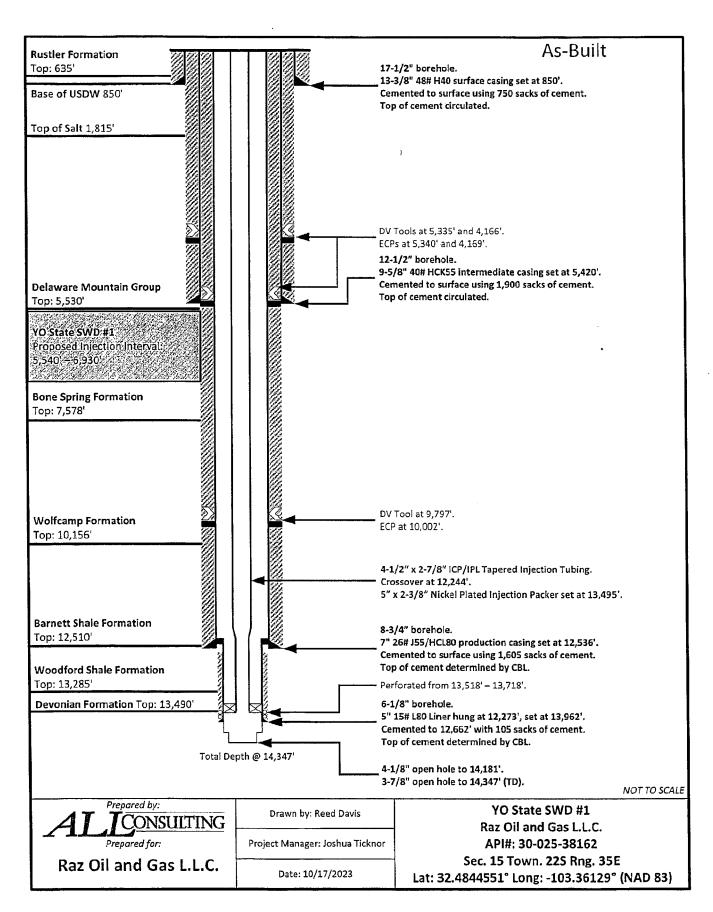
" Surface Location

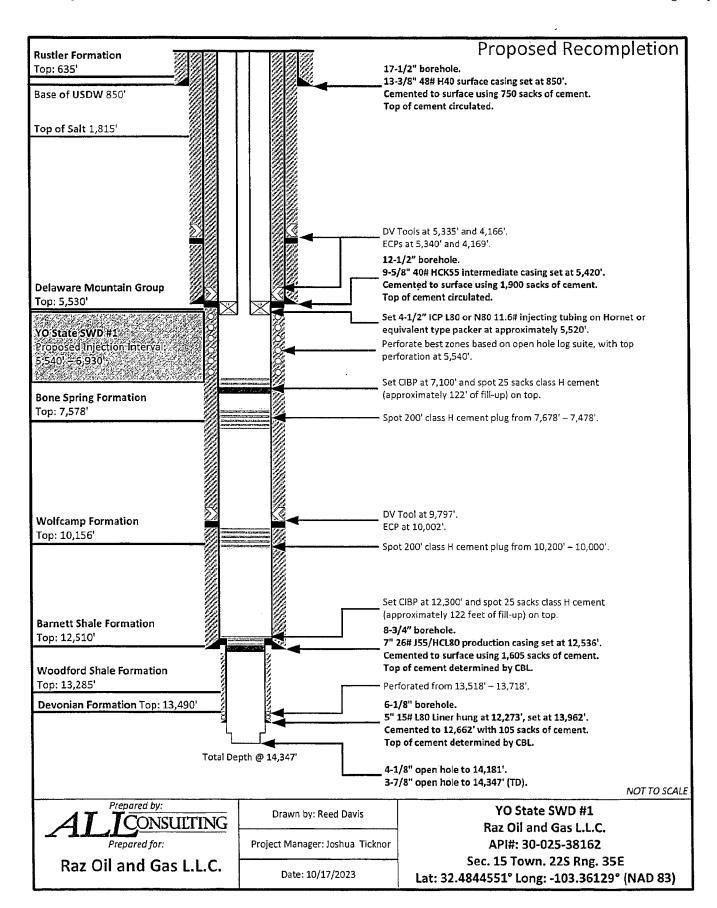
UL or lot no. D	Section 15	Township 21S	Range 35E	Let lds	Feet from the 660	North/South line N	Feet from the 840	Enst/West line W	County Lea
	I		" Bo	ttom Ho	e Location If	Different From	n Surface		
11 '	E'a sel an	Tanadia	Danna	I as Isla	Fant Care that	Number Courts time	Cout Course the	Envi/West line	County

ſ	l.l. or iot no.	Section	Township	Range	lict ldn	Feet from the	North/South line	Feet from the	Enst/West line	County
	12 Dedicated Acres	s la Joint o	r tafill 14 C	onsolidation	Code 15 Or	rder No.				
	40				1					
L							•			

No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.

P		T		HORED LTOD CERTICICATION
T				OPERATOR CERTIFICATION  Thereby certify that the information contained between it true and exouplete
660.				to the best of my inswelsche and belief, and that this organization other
				owns a working interest or independ mineral interest in the kind inclining
×10. →				the proposed beating inde legition or has a right to drill this well at this
				The above sold threath where he sees to include a sum in the sold in the way in the above of the sees
	1			·
				пистем, от из муницату рожниц адтестени от а готродачу рожниц
				order hereinfore entered by the dorson 12/14/15
				Signature Date
				Danny J. Holcomb, Agent for Raz Oil and Gas LLC
1	See original survey pl	at signed 11/10/2006	5	
	Set original variety			danny:irpwlle.net
	7 -4 30 4044551			E-mail Address
	Lat: 32.4844551			
	Long: -103.36129			"SURVEYOR CERTIFICATION
	NAD83			I hereby cerufy that the well location shown on this
	Per NMOCD Well Fil	اح		plat was plotted from field notes of actual surveys
	10111110025			made by me or under my supervision, and that the
				,
				same is true and correct to the best of my belief.
				Date of Survey
	1			Signature and Sead of Professional Surveyor
				Separate Care See Co. Section 18 Sept.
j				
li .				
				Certificate Number





Page 15 of 40

Retrievable Packer Systems

#### **HORNET Packer**

Product Family No. H64682

#### HORNET EL Packer

Product Family No. H64683

#### **APPLICATION**

The mechanically set HORNET™ packer offers ease of operation with quarter-turn right to set and release. Converting it for wireline-setting applications is simple and inexpensive. The HORNET packer provides for landing in compression, tension, or neutral positions. Every component from the jay track, to the internal bypass, to the packing-element system and the upper slip assembly has been developed to ensure the HORNET's setting and releasing reliability.

The HORNET EL packer is run and set on electric line using an E-4™ (Product Family No. H43702) with a slow-set power charge or a J™ setting tool (Product Family No. H41371) and a special wireline adapter kit. An L-10™ type on/off seal nipple is run on top of the packer to connect the tubing to the packer and to house a blanking plug when the packer is used as a temporary bridge plug.

#### Advantages

#### Upper Slip Assembly:

- Thoroughly tested across API minimum to maximum casing ID tolerances for each specified casing weight, for setting and releasing reliability
- Slip-wicker configuration providing bidirectional-load support with solid upper cone to support highest tensile loads
- Staged-release action eliminates high-overpull requirement
- Minimal set-down weight required to anchor slips

#### Internal Bypass Seal:

- Durable bypass seal design provides sealing after unloading, under differential pressures
- No 0-ring sealing system

#### Packing Element System:

- Fully tested to combined ratings at the API's maximum ID tolerance
- Patented enhancements to control overboost
- High-performance, three-piece element system

#### Lower Slip and Jay Assembly:

- Slips and drag blocks tested to maximum API tolerance ID for positive set and ease of release
- One-quarter-turn right setting and releasing action
- Packoff of packing elements with applied tension or compression
- Spacing in jay ensures opening of internal bypass, before slip releasing action begins—important to both ease of release and safety
- Automatically returns to running position



HORNET Packer Product Family No. H64682

HORNET EL Packer Product Family No. H64683

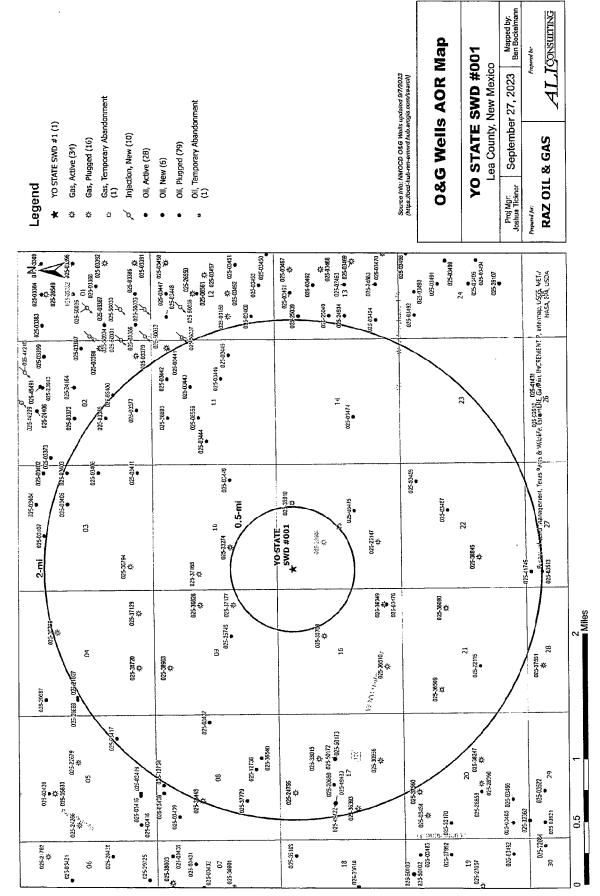
Page 16 of 40

Received by OCD: 12/10/2024 2:38:31 PM

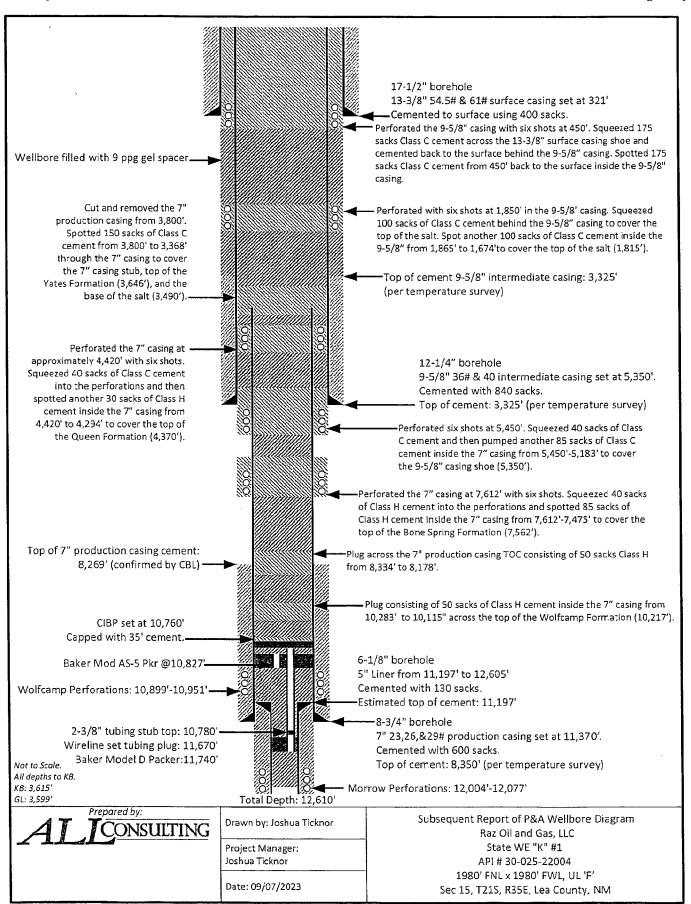
#### Attachment 2

Area of Review Information:

- 2-mile Oil & Gas Well Map
- 1/2-Mile Well Detail List
- Penetrating Wellbore Diagram (Plugged Wells)
- 2-mile Lease Map
- 2-mile Mineral Ownership Map
- 2-mile Surface Ownership Map
- Potash Lease Map



		AOR Tabu	AOR Tabulation for Yo State SWD #001 (Top of Injection Interval: 5,540' - 6,930')	Injection Inter	val: 5,540' - 6,930')		
Well Name	API#	Well Type	Operator	Spud Date	Location (Sec., Tn., Rng.)	Total Vertical Depth (feet)	Penetrate Inj. Zone?
STATE WE K #001	30-025-22004	Plugged	Raz Oil and Gas LLC	1/10/1967	F-15-21S-3SE	12,610 (plugged)	Yes
	Casing /	_ ام	lugging Information for Wells Penetrating the Yo State SWD #001 Injection Zone	the Yo State	SWD #001 Injection	Zone	
Well Name	Tvoe	ាន	Casing Size	700	TOC Method Determined	Sks of Cement	Hole Size
West realise	Surface	321'	13.375"	Surface	Circulation	400	17.5"
	Intermediate	5.350*	9.625"	3,325	Temperature Survey	840	12.25"
	Production	4.420' - 11.370'	7"	8,350	Temperature Survey	900	8.75"
CTATE WE K HOO!	Liner	11.197' - 12,605'	5"	11,197'	Estimated	130	6.125"
1000 444 750	Plugging Details: Tubing	Tubing plug @11,67	plug @11,570. CIBP @10,760 rapped with 35' cement. Plugs @10,283 - 10,115' with 50 sx, @8,334 - 8,178' with 50 sx. Perf and squeeze @7,512' to 7,475' with 40 sx	gs @10,283' - 10,11	15' with 50 sx, @8,334' - 8,178	s with 50 sx. Perf and squeeze @	7,612' to 7,475' with 40 sx
	and spotted 85 sx inside		" casing from 7,612' - 7,475', @5,450' - 5,183' with 40 sx and spotted 80 sx from 5,450' - 5,183', @4,420' - 4,294' w/ 70 sx. 7" casing cut and pulled @3,800', spotted 150	d spotted 80 sx fror	m 5,450' - 5,183', @4,420' - 4,:	294' w/ 70 sx. 7" casing cut and pu	illed @3,800', spotted 150
	sx from 3,800' to 3,368'.		Perf and squeeze @1,850 - 1,674' with 100 sx and spotted 100 sx from 1,865' - 1,674', @450' - surface with 175 sx and spotted 175 sx from 450' - surface.	.00 sx from 1,865' -	1,674', @450' - surface with 1	175 sx and spotted 175 sx from 450	)' - surface.



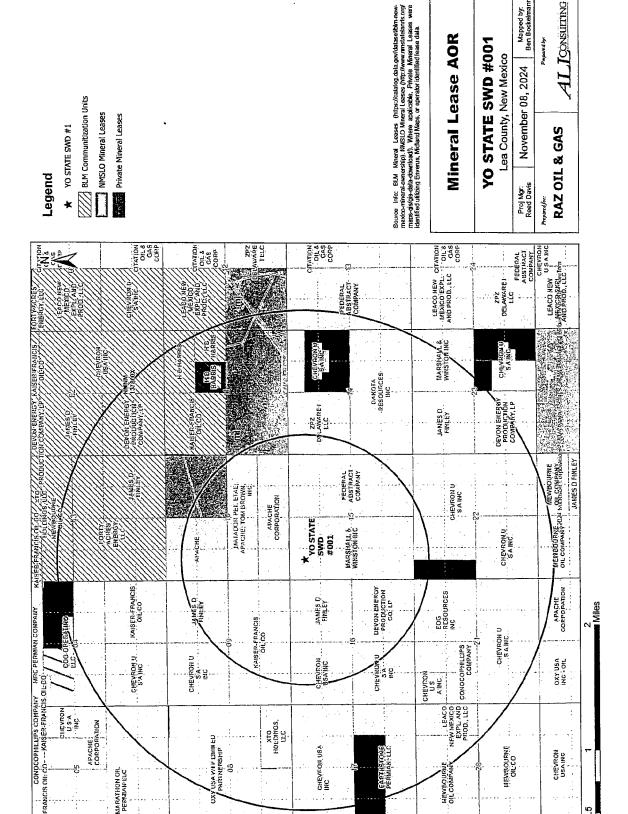
Page 20 of 40

0.5

V.F PETROLEUM LAG

KPC PERMIAN COMPANY

Mapped by: Ben Bockelmann



Released to Imaging: 12/12/2024 11:22:28 AM

CHEVRON

MEWECURNE

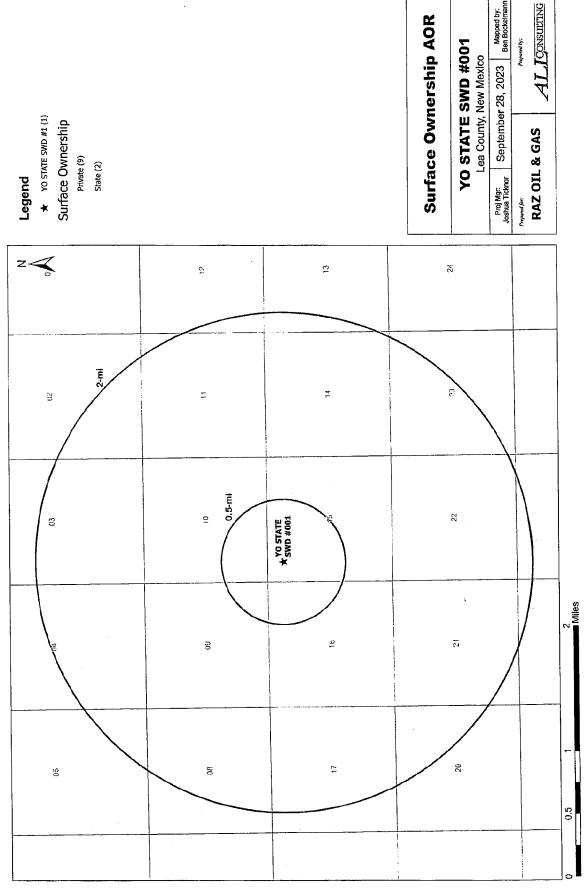
NEWCOURNE CIL COMPANY

MEWBOURNE OIL COMPANY

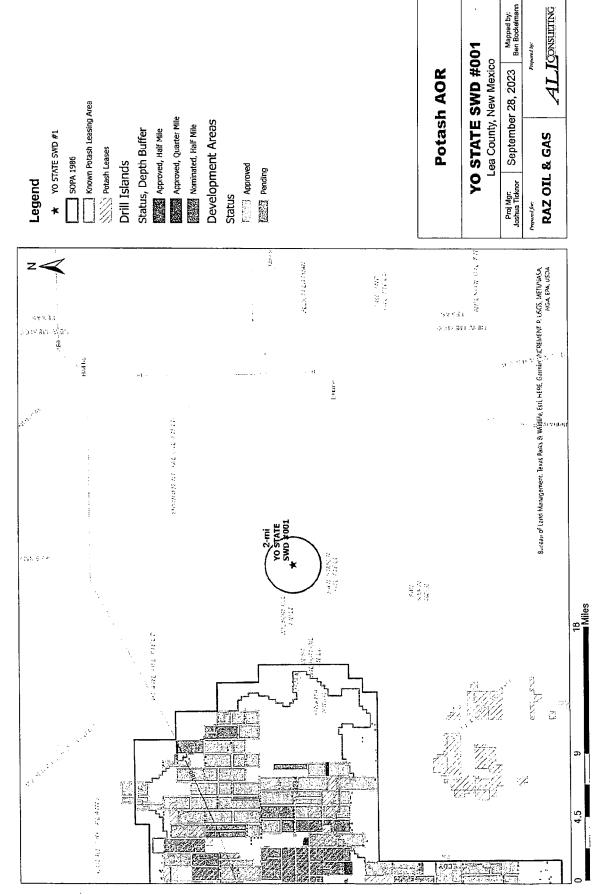
Page 21 of 40

# Mineral Ownership AOR YO STATE SWD #001 Lea County, New Mexico Proj Myr. Joshua Ticknor September 28, 2023 Ban Bockelman Proposed by: Proposed b

Page 22 of 40



Page 23 of 40



Page 24 of 40

Attachment 3

Source Water Analysis

Received by OCD: 12/10/2024 2:38:31 PM

								Source	Source Water Analysis	er An	alysis						
							az Oll	and G	Raz Oll and Gas LLC - YO State SWD #001	YO Sta	te SW	D #001					
	API	Lafftude	Langitude	Section	Section Township Range Unit Figns Figew County State	Range	rien.	Ftgns	Ftgew	County	State	Field	Formation	TDS (mg/L)	TDS (mg/L) Chloride (mg/L)	Bicarbonate (mg/L)	Sulfate (mg/l
1 5001 4001	2000 520177	12.5750008	77.505074.101.4730377	15	208	35E	Ξ	1980N	:099	LEA	ž	LYNCH	BONESPRING	173,141	93,660	5,174	916'L
Tool line	\$61275	-	12.5070038 -103.4812317	-	215	346	-	23105	W099	1.EA	ž	GRAMA RIDGE NORTH	NONESPRING	294,627	216,575	74	403
	1002577250		32.5060349 -103.4983444	_	215	341		19808	W099	LEA	ž	BERRY NORTH	DOMESPIUNG	192,871	132,048	163	445
	3003577135	12 5070038	12 5070038 -103.4812317	4	218	145	٠	23105	W099	LEA	ž	GRAMA RIDGE NORTH	BONESPRING	294,627	216,575	ЪT	403
1110/20	SCHOOL SACKING	12 4706993	12 4706093 .103 4818954	12	215	146	۵	330N	460W	Lca	ž		BONE SPRING 2ND SAND	261,089	160,264	122	425
	1002542103	73 A7 10767	3027274 101- 7370174 CF	7	215	34E	~	200N	10861	na I	NN		BONE SPRING ZNI) SAND	184,233	112,775	488	425
	3005334441	12 3889061	12 38 89961 -103 4941711	-	225	346	×	16503	W0861	ES.	Ž		BONE SPRING 2ND SAND	869'991	101,677	19	878
	3005341566		12 18 18 18 161 A084 480	۶	228	7	_	200	W099	153	ž		BONE SPRING 2ND SAND	158,147	87 8,978	232	71
	2002541184		103 4801129	Ļ	225	341:	Э	2005	1730);	27	N.		BONE SPRING JRD SAND	156,141	97,978	305	1,00
	200521183		11.7084 101.	-	225	╀	Э	2008	17801:	123	Ž		BONE SPRING 3RD SAND	165,155	177,001	220	560
	3002,341183		17 385006 -103.4892733	-	228	╀	0	2005	17801;	Lea	ž		HONE SPRING 3RD SAND	165,135	140,777	220	860
	3002570461		12 4KIISK32 . 103.4253387	=	215	34:	-	NOROZ	Z080W	LEA	ž	NOSTIM	MORROW	11,648	996	2,161	5,252
	200525010			,	0175		[	NOV	2027	إ	1414		SillVA		247.872	1601	30.984

Page 25 of 40

Page 26 of 40

#### Attachment 4

Injection Formation Water Analysis

Released to Imaging: 12/12/2024 11:22:28 AM

Released to Imaging: 3/10/2025 3:05:35 PM

Received by OCD: 12/10/2024 2:38:31 PM

								Injec	ion F	ormat	ion Wat	Injection Formation Water Analysis					
						Raz Oil	and G	as LLC	YO St	ate SW	fD #001 -	il and Gas LLC - YO State SWD #001 - Delaware Mountain Group	untain Group				
	API	Latitude	tatitude tongitude Section Township Rang	Section	Township	Range	L Park	ge Unit Figns Figew County State	, gew	ounty	State	Fleid	Formation	TDS (mg/L)	Chloride (mg/L)	TDS (mg/1) Chloride (mg/L) Bicarbonate (mg/L) Sulfate (mg/L)	Sulfate (mg/L)
:A CTATE #001	3003511696	12, 5999 107	-103,5331573	~	208	¥	¥	18008	W0861	Y:I:I	NM LLEA	I.SV:III.INON V:I'I	DELAWARE	152,064	102,148	404	169
EA CTA TE #601	201 CF2 COOF	17 5976906	-103.5367584	2	205	¥	ž	8 SJ066	W078	V:I:I	NM AH.I	NM LEA NORTHEAST	· DELAWARE	296,822	215237	143	294
SOUNTE WILLS	3002532466	12.6028633	-103.5367584	7	208	12	17	2440N 8	WUCS	LEA	NN LLEA	NM LLEA NORTHEAST	DELAWARE	340,838	245,270	229	147
10	3002502427	· · · ·	-103.5202.56	12	205	¥	<u>-</u>	9803 6	W099	I.I.	MM	V:I'I	DELAWARE	214,787	132,700	208	918'1
O 21 PEDERAL MORZII	3002540626 12	12 1709793	Ī	21	228	¥	×	375S 375W Lea	75//	Г	ΣX		DELAWARE-BRUSHY CANYON	266,468	167,562	366	

Released to Imaging: 3/10/2025 3:05:35 PM

Page 27 of 40

Page 28 of 40

#### Attachment 5

- Water Well Map
- Well Data

Source Info: NMOSE PODs updated 9/21/2023 (https://geospatiakdata-ose.ppandata.arcgis.com/search?collection=Dataset)

Water Wells AOR Map YO STATE SWD #001 Lea County, New Mexico September 27, 2023 RAZ OIL & GAS

Change Location of Well (0) Capped (0) Plugged (0)

Pending (0) Active (1)

Legend

OSE PODs

Status

★ YO STATE SWD #1 (1)

Page 30 of 40

			Water Well San	Water Well Sampling Rationale	
		Ra	Raz Oil and Gas LLC - YO State SWD #001	· YO State SWD #0	101
Water Wells	Owner	Available Contact Information	Use	Sampling Required	Notes
CP-00587-POD1	The Merchant Livestock Company	P.O. Box 1105 Eunice, NM 88231spencer@merchantlivestock.com	Livestock Watering	Yes	CP-00587-POD1 was sampled on June 7, 2015.

Page 31 of 40



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88246

#### Analytical Results For:

RAZ OIL & GAS BEN THOMPSON P. O. BOX 1180 **EUNICE NM, 88231** NONE GIVEN

Fax To:

Received: Reported: 06/08/2015

06/12/2015 WATER WELL CP00587

Project Name: Project Number: Project Location:

NONE GIVEN LEA COUNTY, NM

Sampling Date:

Sampling Type:

06/07/2015 Water

Sampling Condition: Sample Received By: \*\* (See Notes)

Jodi Henson

Sample ID: WELL WATER (H501468-01)

Chloride, SM4500Cl-B

Chloride\*

TDS 160.1

TDS\*

mg/L

Analyzed By: AP

True Value QC Qualifier Analyte Result Reporting Limit Analyzed Method Blank 85 % Recovery 06/09/2015 ND 92.0 4.00 104 100 0.00 104 mg/LAnalyzed By: AP Analyte Analyzed Method Blank BS RPD Qualifler Result Reporting Limit % Recovery True Value OC 06/11/2015 860 5.00 ND 552 105 527 1.35

Cardinal Laboratories

\*=Accredited Analyte

red by Cartinol within thiny (30) plays after completion of the applicable activities. in no event shall Control be Hable for incidental or conseq Big Office Mediconer State Descript mores years may be thought the state of years and the state of the state arrang out of or related to the pent

College Strong

Celey D. Keene, Lab Director/Quality Manager

Page 2 of 4

Page 32 of 40

Received by OCD: 12/10/2024 2:38:31 PM

Attachment 6

No Hydrologic Connection Statement

Released to Imaging: 12/12/2024 11:22:28 AM

Released to Imaging: 3/10/2025 3:05:35 PM

Page 33 of 40



RE: Raz Oil and Gas LLC - YO State SWD #1 - Plug Back Saltwater Disposal Application, Lea County, New Mexico

ALL Consulting LLC (ALL) has performed a thorough hydrologic investigation related to the proposed plug back of the YO State SWD #l into the Delaware Mountain Group. The hydrologic investigation was conducted to determine if there were any existing or potential connections between the proposed injection intervals in the Delaware Mountain Group and the deepest underground source of drinking water (USDW).

ALL performed an assessment and analysis of the subsurface geophysical log data along with published documents on the groundwater in this vicinity of Eddy County, New Mexico. Based on ALL's assessment and analysis there is containment through multiple confining zones above the Delaware Mountain Group and the USDW and over 4,690 feet of vertical separation between the base of the USDW and the top of the injection interval. Additionally, there is no evidence of extensive faulting that would allow for communication between the USDW and the Delaware Mountain Group.

October 19, 2023

Tom Tomastik

Date

Chief Geologist and Regulatory Specialist

ALL Consulting LLC

Attachment 7

Public Notice Affidavit and Notice of Application Confirmations

Released to Imaging: 12/12/2024 11:22:28 AM

Released to Imaging: 3/10/2025 3:05:35 PM

Page 34 of 40

Page 35 of 40

#### APPLICATION FOR AUTHORIZATION TO INJECT

NOTICE IS HEREBY GIVEN: That Raz Oil and Gas L.L.C., P.O. Box 1180 Eunice, NM 88231, is requesting that the New Mexico Oil Conservation Division administratively approve the APPLICATION FOR AUTHORIZATION TO INJECT as follows:

PURPOSE: The intended purpose of the injection well is to dispose of salt water produced from permitted oil and gas wells.

WELL NAME AND LOCATION: YO State SWD #1

Located 12.24 miles northwest of Eunice, NM

NW 1/4 NW 1/4, Section 15, Township 21S, Range 35E

660' FNL & 840' FWL

Lea County, NM

NAME AND DEPTH OF DISPOSAL ZONE: Delaware Mountain Group (5.540' – 6,930')

EXPECTED MAXIMUM INJECTION RATE: 20,000 Bbls/day

EXPECTED MAXIMUM INJECTION PRESSURE: 1,108 psi (surface)

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

Additional information may be obtained by contacting Joshua Ticknor at (580)-916-2126.

Conservation Division, 1220 South St. Francis Dr., Santa Fe, New Mexico 87505.

Page 36 of 40

.,, 11, 1.

### Affidavit of Publication

STATE OF NEW MEXICO COUNTY OF LEA

I, Daniel Russell, Publisher of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, solemnly swear that the clipping attached hereto was published in the regular and entire issue of said newspaper, and not a supplement thereof for a period of 1 issue(s).

> Beginning with the issue dated October 24, 2023 and ending with the issue dated October 24, 2023.

LEGAL NOTICE October 24, 2023

#### **APPLICATION FOR AUTHORIZATION TO INJECT**

NOTICE IS HEREBY GIVEN: That Raz Oil and Gas L.L.C., P.O. Box 1180 Eunice, NM 88231, is requesting that the New Mexico Oil Conservation Division administratively approve the APPLICATION FOR AUTHORIZATION TO INJECT as follows:

PURPOSE: The intended purpose of the injection well is to dispose of salt water produced from permitted oil and gas wells.

WELL NAME AND LOCATION:

YO State SWD #1 Located 12.24 miles northwest of Eunice, NM NW ¼ NW ¼, Section 15, Township 21S, Range 35E 660' FNL & 840' FWI.

Lea County, NM

NAME AND DEPTH OF DISPOSAL ZONE: EXPECTED MAXIMUM INJECTION PATE: EXPECTED MAXIMUM INJECTION PRESSURE:

Delaware Mountain Group (5,540' – 6,930') 20,000 Bbls/day 1,108 psl (surface)

Objections or requests for hearing must be filed with the New Mexico Oll 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 Oliver Seekins at 918-382-7581. #00284109

Publisher

Sworn and subscribed to before me this 24th day of October 2023.

Notary LeAnn Whitehead

My commission expires June 07, 2024 (Seal)

OFFICIAL SEAL

LEANN WHITEHEAD

Notary Public State of New Mexico

My Commission Expires

This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937 and payment of fees for said publication has been made.

67115320

00284109

DANIEL ARTHUR
ALL CONSULTING
1718 S. CHEYENNE AVE.
TULSA, OK 74119

	Raz Oll and Gas L.L.C · Y	Raz Oil and Gas L.L.C - YO State SWD #1 - Affected Persons	suc			
A M A - A Donte, Classification	. Entity - Proof of Notice	Entity - As Mapped/Exhibited	Address	αţλ	State	Zip Code
Allected Faity Classification	New Mexico State Land Office	NMSLO	310 Old Santa Fe Trail	Santa Fe	ΜN	87501
Mineral / Surface Owner	New Mexico Oil Concervation District 1	N/A	1625 N. French Drive	Hobbs	NM	88240
MMIOCD DISTINCT CHICK	Federal Abstract Company	Federal Abstract Company	P.O. Box 4362	Houston	ΧL	77210-4362
NMSLO Lessee	Owige Energy Production Company Limited Partnership	Devon Energy Production Co. LP	333 W Sheridan Avenue	Oklahoma City	χo	73102
NMSt.U Lessee	lames D Finley	James D Finley	1308 Lake Street Suite 200	Fort Worth	ΧŁ	76102
NMSLO Lessee		Apache Corporation	303 Veterans Airpark Ln #1000	Midland	×	79705
NMSLO / Fee Lessee		Kaiser-Francis Oil Co	P.O. Box 21468	Tulsa	š	74121
NMSLO Lessee		Matador Pet. Etal.	5400 LBJ Freeway, Suite 1500	Dallas	¥	75240
Fee Lessee	Tom Brown Incorporated	Tom Brown, Inc.	S08 W Wall, Suite 500	Midland	ΧĽ	79701
Hee Lessee						
Notes: The affected parties above received notification of this C-108 application	n of this C-108 application.					

Certified Mail® Labels

ALL Consulting LLC 1718 S Cheyenne Ave Tulsa OK 74119

10/31/2023



Top of the page

ALL Consulting LLC 1718 S Cheyenne Ave Tulsa OK 74119

Place label at top of the center of the

envelope and fold at dotted line.

10/31/2023 stamps endicia

Print postage using Stamps.com Template SDC-3610





Page 38 of 40

Place label at top of the center of the envelope and fold at dotted line.

ainan geieilleg

**CERTHED MATE** 



ailyakaeleikeeko CHENNICH BINDAVIA



Federal Abstract Company PO BOX 4362 HOUSTON TX 77210-4362

James D. Finley 1308 LAKE ST STE 200 FORT WORTH TX 76102-4505

ALL Consulting LLC 1718 S Cheyenne Ave Tulsa OK 74119

Place label at top of the center of the envelope and fold at dotted line.

10/31/2023 stamps endicia

ALL Consulting LLC 1718 S Cheyenne Ave Tulsa OK 74119

10/31/2023 stamps endicia



Place label at top of the center of the envelope and fold at dotted line.

GILVINI GEIBIULEE OBRIBIED MAIL







Kaiser-Francis Oil Company PO BOX 21468 TULSA OK 74121-1468

Tom Brown Incorporated 508 W WALL ST STE 500 MIDLAND TX 79701-5062

For best results, feed this sheet through your printer as few times as possible. To purchase or for printing instructions go to www.stamps.com/3610. Released to Imaging: 12/12/2024 11:22:28 AM

Covered by and/or for use with U.S. Patents 6,244,763, 6,868,406, 7,216,110, 7,236,956, 7,236,970, 7,343,357, 7,490,965, 7,567,940, 7,613,639, 7,743,043, 7,882,094, 8,027,326, 8027,327,8027,327,8027,336,8041,644, and 8,046,823 8,103,647 8,195,579, 8,301,572, 8,392,391 8,498,943.



Page 39 of 40

#### Received by OCD: 12/10/2024 2:38:31 PM

#### Certified Mail® Labels

ALL Consulting LLC 1718 S Cheyenne Ave Tulsa OK 74119

Place label at top of the center of the

envelope and fold at dotted line.

FROM 74119 10/31/2023 stamps endicla



Top of the page

ALL Consulting LLC 1718 S Cheyenne Ave Tulsa OK 74119

Place label at top of the center of the

\$7.180 US POSTAGE SE FIRST-CLASS FROM 74119 HTT 10/31/2023 Stamps andicia



Print postage using Stamps.com Template SDC-3610

# envelope and fold at dotted line. OTIVAN GEIEINGEO





BTINZ/AKGEIEIIHEEFÐ

Cerilled Mail



Matador Resources Company 5400 LBJ FWY STE 1500 DALLAS TX 75240-1017

Apache Corporation 303 VET AIRPARK LN STE 1000 MIDLAND TX 79705-4572

ALL Consulting LLC 1718 S Cheyenne Ave Tulsa OK 74119

10/31/2023 stamps endicia

ALL Consulting LLC

\$7.180 US POSTAGE FIRST-CLASS FROM 74119 10/31/2023



stamps endicia

Place label at top of the center of the envelope and fold at dotted line.

GINANGEIEIUREO G = : III = D M/A I P



1718 S Cheyenne Ave Tulsa OK 74119

Place label at top of the center of the

envelope and fold at dotted line.

ainan Geilille (b O I THE DEVICE OF THE PROPERTY OF THE PROPERTY



**Devon Energy Production Company** Limited Partnership 333 W SHERIDAN AVE OKLAHOMA CITY OK 73102-5010

New Mexico Oil Conservation District 1 1625 N FRENCH DR HOBBS NM 88240-9273

For best results, feed this sheet through your printer as few times as possible. To purchase or for printing instructions go to www.stamps.com/3610. Released to Imaging: 12/12/2024 11:22:28 AM



Page 40 of 40

#### Received by OCD: 12/10/2024 2:38:31 PM

Certified Mail® Labels

Top of the page

Print postage using Stamps.com Template SDC-3610

ALL Consulting LLC 1718 S Cheyenne Ave Tulsa OK 74119

Place label at top of the center of the

envelope and fold at dotted line.

\$7.180 POSTAGE ST. CLASS COM 74119 POSTAGE ST. CLASS ST.

Place label at top of the center of the envelope and fold at dotted line.

911/A/Viqeifiiffied Cerified Mail

ainavraeiriere 6 CERTIFIED MAIL®



New Mexico State Land Office 310 OLD SANTA FE TRL SANTA FE NM 87501-2708

Place label at top of the center of the envelope and fold at dotted line.

> ativiat ceieiree (o OEFTIFIED MAIL®

Place label at top of the center of the envelope and fold at dotted line.

> GINAN GELENLEB @ IAW (GEITTEE)

For best results, feed this sheet through your printer as few times as possible. To purchase or for printing instructions go to www.stamps.com/3610. Released to Imaging: 12/12/2024 11:22:28 AM

Firm Mailing Book ID: 278587

Page 1 2024 Walz CertifiedPro.net

**PS Form 3877** 

12438-0001

Type of Mailing: CERTIFIED MAIL 12/16/2024

	USPS Article Number	Name, Street, City, State, Zip	Postage	Service Fee RR Fee	RR Fee	Rest.Del.Fee	Contents
1	9314 8699 0430 0129 4549 86	New Mexico State Land Office 310 Old Santa Fe Trail Santa Fe NM 87501	\$2.59	\$4.85	\$2.62	\$0.00	Raz Oil Notice
	9314 8699 0430 0129 4549 93	Federal Abstract Company PO Box 4362 Houston TX 77210	\$2.59	\$4.85	\$2.62	\$0.00	Raz Oil Notice
	9314 8699 0430 0129 4550 06	Devon Energy Production Company Limited Partnership 333 W. Sheridan Avenue Oklahoma City OK 73102	\$2.59	\$4.85	\$2.62	\$0.00	Raz Oil Notice
	9314 8699 0430 0129 4550 13	James D. Finley 1308 Lake Street Suite 200 Fort Worth TX 76102	\$2.59	\$4.85	\$2.62	\$0.00	Raz Oil Notice
	9314 8699 0430 0129 4550 20	Apache Corporation 303 Veterans Airpark Ln #1000 Midland TX 79705	\$2.59	\$4.85	\$2.62	\$0.00	Raz Oil Notice
	9314 8699 0430 0129 4550 37	Kaiser-Francis Oil Company P.O. Box 21468 Tulsa OK 74121	\$2.59	\$4.85	\$2.62	\$0.00	Raz Oil Notice
	9314 8699 0430 0129 4550 44	Matador Resources Company 5400 LBJ Freeway, Suite 1500 Dallas TX 75240	\$2.59	\$4.85	\$2.62	\$0.00	Raz Oil Notice
	9314 8699 0430 0129 4550 51	Tom Brown Incorporated 508 W. Wall, Suite 500 Midland TX 79701	\$2.59	\$4.85	\$2.62	\$0.00	Raz Oil Notice
	9314 8699 0430 0129 4550 68		\$2.59	\$4.85	\$2.62	\$0.00	Raz Oil Notice
			Totals: \$23.31	\$43.65	\$23.58	80.00	

AN AND MAN STATE OF THE PROPERTY OF THE PROPER MAIN OFFICE USPS DEC 16 2024

Grand Total:

Dated:

Postmaster: Name of receiving employee

Total Number of Pieces Received at Post Office

List Number of Pieces Listed by Sender

EXHIBIT D. 2

Released to Imaging: 3/10/2025 3:05:35 PM

Karlene Schuman Modrall Sperling Roehl Harris & Sisk P.A. 500 Fourth Street, Suite 1000 Albuquerque NM 87102

			Transact	Transaction Report Details - CertifiedPro.net Firm Mail Book ID= 278587 Generated: 12/30/2024 9:25:53 AM	ertifiedPro.net 78587 25:53 AM						
USPS Article Number	Date Created	Reference Number	Name 1	Name 2	City	State	Zip	Mailing Status	Service Options	Batch ID	Batch ID Mail Delivery Date
9314869904300129455068	2024-12-16 1:35 PM	1 Raz Oil	Marshall & Winston		Midland	X	79705	Delivered	Return Receipt - Electronic, Certified Mail	299086	2024-12-19 9:45 AM
9314869904300129455051	2024-12-16 1:35 PM	1 Raz Oil	Tom Brown Incorporated		Midland	X	79701	Undelivered - To Be Returned	Return Receipt - Electronic, Certified Mail	299086	
9314869904300129455044	2024-12-16 1:35 PM	1 Raz Oil	Matador Resources Company		Dallas	×	75240	Delivered	Return Receipt - Electronic, Certified Mail	299086	299086 2024-12-19 11:02 AM
9314869904300129455037	2024-12-16 1:35 PM	1 Raz Oil	Kaiser-Francis Oil Company		Tulsa	OK	74121	Delivered	Return Receipt - Electronic, Certified Mail	299086	2024-12-23 5:49 AM
9314869904300129455020	2024-12-16 1:35 PM	1 Raz Oil	Apache Corporation		Midland	X	79705	Delivered	Return Receipt - Electronic, Certified Mail	299086	2024-12-19 9:46 AM
9314869904300129455013	2024-12-16 1:35 PM	1 Raz Oil	James D. Finley		Fort Worth	X	76102	Delivered	Return Receipt - Electronic, Certified Mail	299086	2024-12-19 12:18 PM
9314869904300129455006	2024-12-16 1:35 PM	1 Raz Oil	Devon Energy Production Company	Limited Partnership Oklahoma City	Oklahoma City	OK	73102	Delivered	Return Receipt - Electronic, Certified Mail	299086	2024-12-19 7:25 AM
9314869904300129454993	2024-12-16 1:35 PM	1 Raz Oil	Federal Abstract Company		Houston	X	77210	Delivered	Return Receipt - Electronic, Certified Mail	299086	
9314869904300129454986	2024-12-16 1:35 PM	1 Raz Oil	New Mexico State Land Office		Santa Fe	N	87501	Delivered	Return Receipt - Electronic, Certified Mail	299086	2024-12-19 7:45 AM

EXHIBIT 19-3

## **Affidavit of Publication**

STATE OF NEW MEXICO COUNTY OF LEA

I, Andy Brosig, Editor of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, solemnly swear that the clipping attached hereto was published in the regular and entire issue of said newspaper, and not a supplement thereof for a period of 1 issue(s).

> Beginning with the issue dated December 19, 2024 and ending with the issue dated December 19, 2024.

Editór

Sworn and subscribed to before me this 19th day of December 2024.

Business Manager

My commission expires

January 29, 2027E OF NEW MEXICO (Seal) NOTARY PUBLIC GUSSIE RUTH BLACK

COMMISSION # 1087526 COMMISSION EXPIRES 01/29/2027

This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937 and payment of fees for said publication has been made.



LEGAL NOTICE December 19, 2024

CASE NO. 25081: Notice to all affected parties, as well as heirs and devisees of: New Mexico State Land Office; Federal Abstract Company; Devon Energy Production Company Limited Partnership; James D. Finley; Apache Corporation; Kaiser-Francis Oil Company; Matador Resources Company; Tom Brown Incorporated; Marshall & Winston Inc. of the Application of Raz Oil and Gas L.L.C. for approval of a salt water disposal well in Lea County, New Mexico. The State of New Mexico through its Oil Conservation Division hereby gives notice that the Division will conduct a status conference at 9:00 a.m. on January 9, 2025 to consider this application. The conference will be conducted in a hybrid fashlon, both in-person at the Energy, Minerals, Natural Resources Department, Wendell Chino Building, Pecos Hall, 1220 South St. Francis Drive, 1st Floor, Santa Fe, NM 87505 and via a virtual meeting platform. To participate in the electronic hearing, see the instructions posted on the docket for the hearing date: https://www.emrd.nm.gov/ocd/hearing-info/. Applicant seeks an order authorizing applicant to plug back the YO State SWD #1 well to the Delaware Mountain Group and authorizing applicant to inject produced water into the Delaware Mountain Group at a depth of approximate 5,540 feet to 6,930 feet. Applicant currently operates the YO State SWD #1 (API 30-025-38162), at a surface location 660' from the North line and 840' from the West line, Lot D, Section 15, Township 21 South, Range 35 East, NMPM, Lea County, New Mexico. Applicant further requests that the Division approve a maximum daily injection rate for the well of 20,000 bits per day. Said area is located approximately 12.24 miles northwest of Eunice, New Mexico.

01104570

00296933

DOLORES SERNA MODRALL, SPERLING, ROEHL, HARRIS & P. O. BOX 2168 ALBUQUERQUE, NM 87103-2168



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

APPLICATION OF RAZ OIL AND GAS L.L.C. TO APPROVE SALT WATER DISPOSAL WELL IN LEA COUNTY, NEW MEXICO.

**CASE NO. 25081** 

#### NOTICE OF FILING REVISED EXHIBIT PACKET

Pursuant to the discussion at the February 13, 2025 Examiner Docket and the Technical Examiner's requests, Raz Oil and Gas L.L.C. is providing a revised exhibit packet, revised as follows:

- 1) Exhibit A-3: Exhibit A-3 previously contained a revised Wellbore Diagram, but Exhibit A-3 has been revised to include the revised C-108, which includes the revised Wellbore Diagram. The C-108 has been revised to reflect the change to the injection interval to 5,540 feet to 6,104 feet and to limit the maximum requested injection volume to 8000 bwpd.
- 2) New Exhibit A-6: Raz has included a new Exhibit A-6, which contains an economics analysis regarding why it is uneconomical to continue to operate the YO State #1 SWD as a Devonian injector.
- 3) New Exhibit A-7: Raz has included a new Exhibit A-7, which contains the entire Cardinal Water Report, as requested.
- 4) New Exhibit B-2: Raz has included a new Exhibit B-2, which summarizes Raz's understanding of the Division's conditions of approval and Raz's proposed next steps in response to requests from the Division regarding the Well's casing from approximately 8,700 feet back to approximately 5,300 feet

5) Revised Exhibit C-1: Exhibit C-1 has been revised to eliminate references to the Upper Cherry Canyon formation because the revised injection interval does not include that formation.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS & SISK, P.A.

Earl E. DeBrine, Jr.

Deana M. Bennett

Yarithza Peña

Post Office Box 2168

500 Fourth Street NW, Suite 1000

Albuquerque, New Mexico 87103-2168

Telephone: 505.848.1800 earl.debrine@modrall.com deana.bennett@modrall.com yarithza.pena@modrall.com

Attorneys for Raz Oil and Gas L.L.C.

#### **CERTIFICATE OF SERVICE**

I hereby certify that on March 10, 2025, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
P.O. Box 2208
Santa Fe, NM 87504
(505) 988-4421
mfeldewert@hollandhart.com
agrankin@hollandhart.com
pmvance@hollandhart.com

Attorneys for Mewbourne Oil Company

Deana M. Bennett

Deena M. Bennett