



February 5, 2018

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

VIA EMAIL

Attn: Mr. Phillip Goetze, PG

Re: Request to Extend Expiration Dates for NMOCD Permits SWD-1615 pertaining to Owl SWD Operating, LLC's Talon SWD No.1, located in Section 20, T18S-R34E, NMMPM, Lea County, New Mexico.

Dear Mr. Goetze,

Owl SWD Operating, LLC had suspended some of its projects to accommodate the changes in the climate of the industry over the last couple years. Management has determined that it would now like to move forward with the subject project as permitted. The original permit is set to expire on February 8, 2018. The APD C-101 will be filed upon approval of this request for extension of the SWD permit.

I have reviewed the subject Area of Review and determined that no impactful changes have taken place. The Talon SWD well will be configured exactly as originally permitted.

Owl is currently moving forward on its SWD drilling and completion program and anticipates the Talon SWD project coming up in 2018. We therefore request an appropriate extension of one year for the subject permit SWD-1615.

If you or your staff has any questions, please do not hesitate to call or email me.

Best regards,

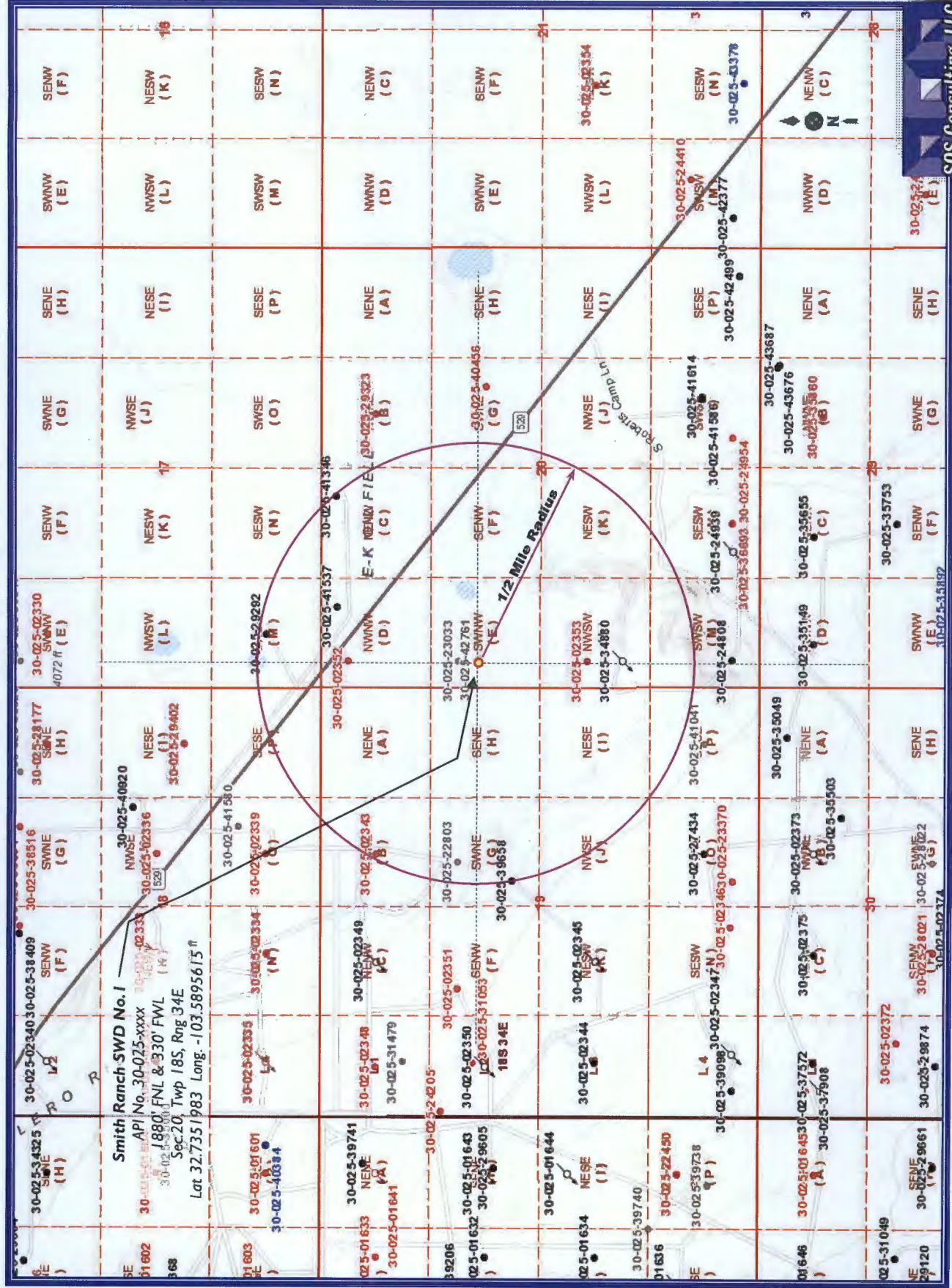
A handwritten signature in black ink, appearing to read 'Ben Stone', written over a white background.

Ben Stone, SOS Consulting, LLC
Agent for Owl SWD Operating, LLC

Attachments: AOR Map; Original AOR Map; SWD-1615
Cc: Project file

OWL Talon SWD No.1 - Area of Review

(Attachment to SWD-1615; Request for Expiration Date Extension)



OWL SWD Operating, LLC
Proposed Talon SWD #1
0.5 mile Area of Review

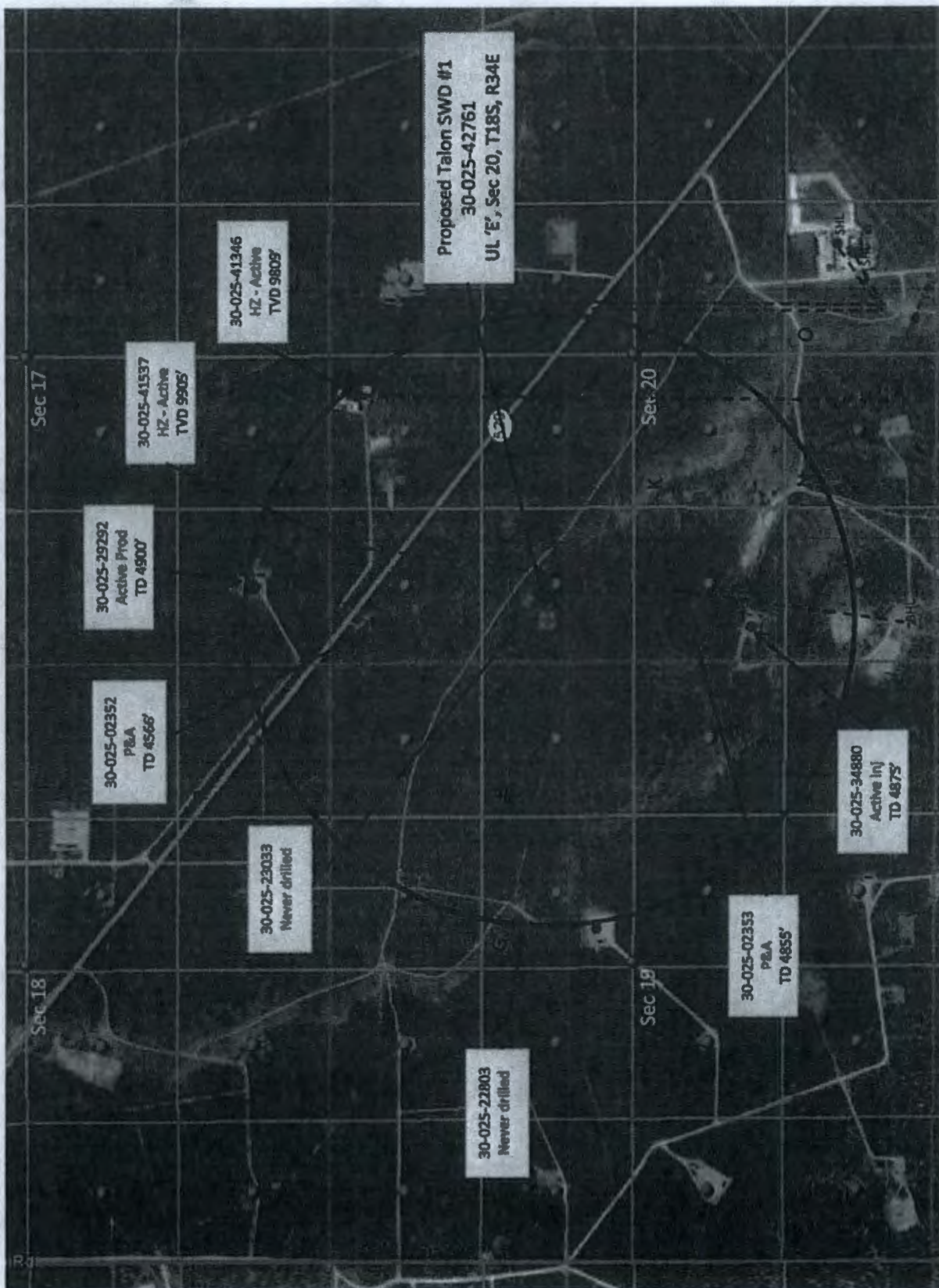


EXHIBIT "C"

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

David Martin
Cabinet Secretary

Tony Delfin
Deputy Cabinet Secretary

David R. Catanach, Division Director
Oil Conservation Division



Administrative Order SWD-1615
February 8, 2016

**ADMINISTRATIVE ORDER
OF THE OIL CONSERVATION DIVISION**

Pursuant to the provisions of Division Rule 19.15.26.8B, NMAC, OWL SWD Operating, LLC (the "operator") seeks an administrative order for its proposed Talon SWD Well No. 1 with a proposed location 1880 feet from the North Line and 330 feet from the West line, Unit E of Section 20, Township 18 South, Range 34 East, NMPM, Lea County, New Mexico, for commercial disposal of produced water.

THE DIVISION DIRECTOR FINDS THAT:

The application has been duly filed under the provisions of Division Rule 19.15.26.8B, NMAC and satisfactory information has been provided that affected parties as defined in said rule have been notified and no objections have been received within the prescribed waiting period. The applicant has presented satisfactory evidence that all requirements prescribed in Division Rule 19.15.26.8 NMAC have been met and the operator is in compliance with Division Rule 19.15.5.9 NMAC.

IT IS THEREFORE ORDERED THAT:

Owl SWD Operating, LLC (OGRID 308399), is hereby authorized to utilize its Talon SWD Well No. 1 (API 30-025-42761) with a proposed location of 1880 feet from the North Line and 330 feet from the West line, Unit E of Section 20, Township 18 South, Range 34 East, NMPM, Lea County, for disposal of oil field produced water (UIC Class II only) through an open-hole interval within the Devonian and Silurian aged rocks from 14900 feet to 15900 feet. Injection will occur through internally-coated, **4½-inch** or smaller tubing and a packer set within 100 feet of the uppermost perforation.

Prior to commencing disposal, the operator shall submit mudlog and geophysical logs information to the Division's District geologist and Santa Fe Bureau Engineering office, showing evidence agreeable that only the permitted formations are open for disposal including a summary of depths (picks) for contacts of the formations which the Division shall use to amend this order for a final description of the depth for the injection interval.

This permit does not permit disposal into the Ellenburger formation (lower Ordovician) or lost circulation intervals directly on top and obviously connected to this formation.

The operator shall supply the Division with a copy of a mudlog over the permitted disposal

interval and an estimated insitu water salinity based on open-hole logs. If significant hydrocarbon shows occur while drilling, the operator shall notify the Division's District I office and the operator shall be required to receive written permission prior to commencing disposal.

The operator shall run a CBL (or equivalent) across the 7-inch liner through the 9-5/8 casing to surface to demonstrate a good cement bond between the liner and casing, and good cement across the entire casing.

Within one year after commencing disposal, the operator shall submit to the Division copies of an injection survey run on this well consisting of a temperature log, or equivalent, run under representative disposal rates.

IT IS FURTHER ORDERED THAT:

The operator shall take all steps necessary to ensure that the disposed water enters only the approved disposal interval and is not permitted to escape to other formations or onto the surface. This includes the well construction proposed and described in the application.

After installing tubing, the casing-tubing annulus shall be loaded with an inert fluid and equipped with a pressure gauge or an approved leak detection device in order to determine leakage in the casing, tubing, or packer. The casing shall be pressure tested from the surface to the packer setting depth to assure casing integrity.

The well shall pass an initial mechanical integrity test ("MIT") prior to initially commencing disposal and prior to resuming disposal each time the disposal packer is unseated. All MIT procedures and schedules shall follow the requirements in Division Rule 19.15.26.11A, NMAC. The Division Director retains the right to require at any time wireline verification of completion and packer setting depths in this well.

The wellhead injection pressure on the well shall be limited to **no more than 2980 psi**. In addition, the disposal well or system shall be equipped with a pressure limiting device in workable condition which shall, at all times, limit surface tubing pressure to the maximum allowable pressure for this well.

The Director of the Division may authorize an increase in tubing pressure upon a proper showing by the operator of said well that such higher pressure will not result in migration of the disposed fluid from the target formation. Such proper showing shall be demonstrated by sufficient evidence including but not limited to an acceptable Step-Rate Test.

The operator shall notify the supervisor of the Division's District I office of the date and time of the installation of disposal equipment and of any MIT so that the same may be inspected and witnessed. The operator shall provide written notice of the date of commencement of disposal to the Division's District office. The operator shall submit monthly reports of the disposal operations on Division Form C-115, in accordance with Division Rules 19.15.26.13 and 19.15.7.24 NMAC.

Without limitation on the duties of the operator as provided in Division Rules 19.15.29 and 19.15.30 NMAC, or otherwise, the operator shall immediately notify the Division's District I office of any failure of the tubing, casing or packer in the well, or of any leakage or release of water, oil or gas from around any produced or plugged and abandoned well in the area, and shall take such measures as may be timely and necessary to correct such failure or leakage.

The injection authority granted under this order is not transferable except upon division approval. The Division may require the operator to demonstrate mechanical integrity of any injection well that will be transferred prior to approving transfer of authority to inject.

The Division may revoke this injection permit after notice and hearing if the operator is in violation of 19.15.5.9 NMAC.

The disposal authority granted herein shall terminate two (2) years after the effective date of this order if the operator has not commenced injection operations into the subject well. One year after the last date of reported disposal into this well, the Division shall consider the well abandoned, and the authority to dispose will terminate *ipso facto*. The Division, upon written request mailed by the operator prior to the termination date, may grant an extension thereof for good cause.

Compliance with this order does not relieve the operator of the obligation to comply with other applicable federal, state or local laws or rules, or to exercise due care for the protection of fresh water, public health and safety and the environment.

Jurisdiction is retained by the Division for the entry of such further orders as may be necessary for the prevention of waste and/or protection of correlative rights or upon failure of the operator to conduct operations (1) to protect fresh or protectable waters or (2) consistent with the requirements in this order, whereupon the Division may, after notice and hearing, terminate the disposal authority granted herein.



DAVID R. CATANACH
Director

DRC/mam

cc: Oil Conservation Division – Hobbs District Office
Well File - 30-025-42761

Goetze, Phillip, EMNRD

From: ben@sosconsulting.us
Sent: Monday, February 5, 2018 4:01 PM
To: Goetze, Phillip, EMNRD
Subject: Extension Request; Owl's Talon SWD-1615...
Attachments: ExtRqst_SWD1615_Owl-TalonSWD_AsSubmitted_20180205.pdf

Phillip,

Here's another one that Owl has expiring in a few... I suppose they're getting lined up to start cranking on these projects.

No changes in the AOR. Attachments included – let me know if you need additional information.

Thanks,
Ben



Visit us on the web at www.sosconsulting.us!

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