

June 8, 2018

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

VIA EMAIL

Attn: Mr. Michael McMillan, OCD Engineering Bureau

Re: Request to Adjust Footage Calls OCD Permit SWD-1679 pertaining to Owl SWD Operating, Gold Coast Federal SWD No.3, located in Section 26, T24S-R33E, NMPM, Lea County, New Mexico.

Dear Mr. McMillan,

The Gold Coast Federal SWD No.3 (SWD-1679) was approved nearly one year ago. For various reasons, the BLM APD submittal was delayed until this past February. There were issues getting the proper rig data and such and for whatever reason, the site didn't get surveyed until February 5, 2018. When completing all the APD data, I overlooked the fact that the spot was off – I was intent on getting the APD done, as was Owl. The individual responsible for the project is no longer at Owl so we aren't sure when or why exactly a disconnect happened.

The result is that the survey spot is 47 feet east and 1.5 feet north of what had been permitted for SWD months earlier by the C-108 application.

I've supplied a modified C-102 to illustrate the situation and a copy of the permit is also attached. ***I have reviewed the subject Area of Review and determined that no changes have taken place and affected parties remain the same.*** The corrected footages should be 2548.5' FSL & 2607' FWL, 26-24S-32E.

We're expecting the APD to be approved any time and Owl expects to move on the well in late July or August.

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

Best regards,



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

Cc: Project file

DISTRICT I
 5625 N. French Dr., Hobbs, NM 88240
 Phone: (575) 333-6161 Fax: (575) 333-6720

DISTRICT II
 811 S. First St., Artesia, NM 88218
 Phone: (575) 748-1283 Fax: (575) 748-6720

DISTRICT III
 1080 Elm Street Rd., Alamogordo, NM 87510
 Phone: (505) 334-6170 Fax: (505) 334-6170

DISTRICT IV
 3229 N. St. Francis Dr., Santa Fe, NM 87505
 Phone: (505) 476-3468 Fax: (505) 476-3462

State of New Mexico
Energy, Minerals & Natural Resources Department
OIL CONSERVATION DIVISION
 1220 South St. Francis Dr.
 Santa Fe, New Mexico 87505

Form C-102
 Revised August 1, 2011
 Submit one copy to
 appropriate
 District Office
 AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number	Pool Code	Pool Name
Property Code	Property Name GOLD COAST 26 FEDERAL	
OGRID No.	Operator Name OWL SWD Operating, L.L.C.	
	Well Number 3	Elevation 3563'

Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
K	26	24S	32E		2548.5	SOUTH	2607	WEST	LEA

Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County

Dedicated Acres	Joint or Infill	Consolidated Code	Order No.
8.26			

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.

WELL PAD 600' x 600'

Surveyed spot 57' East
& 1.5' North of SWD-1679

○ Surveyed
○ Permitted

478'
600'
2607'
436.5'
2548.5'

SWD-1679 permit is
2560' FSL & 2560' FWL

GOLD COAST 26
FEDERAL #3
NMSp-E (NAD 83)
N (Y) = 432640.6'
E (X) = 754105.5'
LAT. = 32.1883610°N
LONG. = 103.6455560°W

NMSp-E (NAD 27)
N (Y) = 432682.1'
E (X) = 712920.7'
LAT. = 32.1882370°N
LONG. = 103.6450781°W

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 voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

Signature _____ Date _____

Print Name _____

E-mail Address _____

SURVEYORS 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.

FEBRUARY 5, 2018

Date of Survey _____

Signature and Seal of Professional Surveyor _____

James E. Tompkins

Job No.: WTC51822
 JAMES E. TOMPKINS 14729
 Certificate Number _____

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

Ken McQueen
Cabinet Secretary

Matthias Sayer
Deputy Cabinet Secretary

David R. Catanach, Division Director
Oil Conservation Division



Administrative Order SWD-1679
June 27, 2017

**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 Gold Coast 26 Federal SWD Well No 3 (API No 30-025-Pending) to be located 2560 feet from the South line and 2560 feet from the West line, Unit letter K of Section 26, Township 24 South, Range 32 East, NMPM, Lea County, New Mexico, for the purpose of 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 objection was received within the required suspense period. The applicant has presented satisfactory evidence that all requirements prescribed in Rule 19 15 26 8 NMAC have been met and the operator is in compliance with Rule 19 15 5 9 NMAC.

IT IS THEREFORE ORDERED THAT

The applicant, OWL SWD Operating, LLC (OGRID 308339) is hereby authorized to utilize its proposed Gold Coast 26 Federal SWD Well No 3 (API No 30-025-Pending) to be located 2560 feet from the South line and 2560 feet from the West line, Unit letter K of Section 26, Township 24 South, Range 32 East, NMPM, Lea County, New Mexico, for disposal of oil field produced water (UIC Class II only) through an open-hole interval within Devonian and Silurian formations from approximately 17050 feet to approximately 19000 feet. Injection shall occur through internally-coated tubing and a packer set a maximum of 100 feet above the top of the open-hole interval.

Injection will occur through either an internally-coated, 4-1/2-inch or smaller tubing and a packer set within 100 feet of the uppermost perforation.

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

Prior to commencing disposal, the operator shall submit mudlog and geophysical logs information, to the Division's District geologist and Santa Fe Engineering Bureau office, showing evidence agreeable that only the permitted formation is 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

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 in the application and any required modifications of construction as required by the Division

The operator shall circulate the cement behind the casing to surface for all surface and intermediate casings

The operator shall run a CBL (or equivalent) across the 7-inch liner from 500 feet above the liner to the bottom of the liner to demonstrate a good cement across the 7-inch liner, and good bond between the liner and the 9-5/8-inch casing

Within two years after commencing disposal, the operator shall conduct an injection survey, consisting of a temperature log or equivalent, over the entire injection interval using representative disposal rates. Copies of the survey results shall be provided to the Division's District I office and Santa Fe Engineering Bureau office

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 3410 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 Division Director retains the right to require at any time the operator to install and maintain a chart recorder showing casing and tubing pressures during disposal operations.

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 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 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 disposal 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 Rule 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
Bureau of Land Management – Carlsbad
Administrative Application - pKSC171584118