

Protested SWD Application

Rose-Coss, Dylan H, EMNRD

From: Rose-Coss, Dylan H, EMNRD
Sent: Wednesday, October 23, 2019 9:41 AM
To: 'gfisher@permianoilfieldpartners.com'
Cc: Murphy, Kathleen A, EMNRD; McClure, Dean, EMNRD; Goetze, Phillip, EMNRD; Lowe, Leonard, EMNRD
Subject: Notification of Protest for Application to Inject: Polaris State SWD #1 _ Franklin Mountain Energy
Attachments: Permian Oilfield Partners_Polaris State SWD #1_Franklin Mountain Energy.pdf

RE: Polaris State SWD #1 (API 30-025-Pending; Admin. Appl. No pDM1926961012) 1343' FSL & 248' FWL Sec 2, T25S, R35E Lea County, NM

Mr. Fisher,

The OCD was notified by the Franklin Mountain Energy Group that they are protesting this application. This party has been identified as an affected person for the location being considered. Because of the protest, the application can no longer be reviewed administratively. You are being notified that for this application to be considered, Permian Oilfield Partners, LLC., currently has two options; the first is to go to hearing, the second is to negotiate a resolution with the protesting party. If the protest is withdrawn, then the application can be reviewed administratively. In the meantime, the application will be retained pending a hearing or other resolution. Please continue to provide OCD with information regarding the standing of this application and feel free to call me with any questions.

Franklin Mountain Energy Contact:

Shelly Albrecht, CPL
Director of Land
Franklin Mountain Energy, LLC
2401 E 2nd Avenue, Suite 300
Denver, CO 80206
Direct: 720-414-7855
Mobile: 720-630-0544
salbrecht@fmellc.com

Regards,

Dylan Rose-Coss

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

(505) 476-3477

Good Morning Phil,

Franklin Mountain is in receipt of Permian Oilfield Partners notice regarding their Polaris State SWD #1 Application for Authorization to Inject. That notice is attached for your reference. We hereby objects to said application due to significant concerns we have with Permian Oilfield Partners plans.

Please confirm receipt of this objection and let me know if you need any further detail.

Have a great day,

Shelly Albrecht, CPL

Director of Land
Franklin Mountain Energy, LLC
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From: Shelly Albrecht
Sent: Wednesday, October 2, 2019 3:58 PM
To: Deana M. Bennett <dmb@modrall.com>
Cc: Elliot Berard <eberard@fmellc.com>
Subject: Objection to Polaris State SWD #1 Well

Deana,

We'd like to protest the attached from Permian Oilfield Partners regarding their Polaris State SWD #1 well. The notice was received 9/27/19, so we understand our objection deadline would be 10/12/19. Reasons for our objection:

- This well is located in Section 2. Section 2 & 11-25S-35E are part of our near term development plans.
- The add'l traffic off Hwy 128, the main access to our development would be a problem.
- From our drilling engineer:
 - o According to their APD, max injection pressure they planning to have is 3,312 psi, average – 2,000 psi.
 - o Proposed injection zone (OH) is 16,558' -18,429'. They will use 5 1/2" 17# HCL 80 injection tubing from 11,589' to 16,513' and 7" casing above.
 - o Burst pressure on the tubing at 100% rating is 7,740 psi. Hydrostatic pressure at 16,513' is 7,150 psi. If they apply their proposed average injection pressure of 2,000 psi, the total pressure will be 9,150 psi (10,462 psi for max).
 - o This tubing is not cemented and could burst. Casing/liner behind this tubing also L 80/HCL-80 grades with burst rating of 9,180 psi for liner and 5,750 psi for casing. Potentially casing could split/burst.

What is the proper process now for these objections? Do you need a letter from me to the NMOCD? Maybe we should discuss in the morning when you have some time.

Thanks,