

Rose-Coss, Dylan, EMNRD

From: Rose-Coss, Dylan, EMNRD
Sent: Wednesday, December 21, 2022 3:49 PM
To: David Cain; Steven Buckler
Cc: Goetze, Phillip, EMNRD; Schaefer, Alana, EMNRD; Gebremichael, Million, EMNRD
Subject: RE: [EXTERNAL] FW: Notification of Protest for Application to Inject: AID State Com #1_Spur Energy Partners

Hi David and Steven,

Is the CBL submitted to the well file? The OCD has concerns about the cement integrity and coverage when older producers are converted to injectors. A remedial cement job might be necessary. It would be nice to at least determine the top of Cement. We can set up a TEAMS meeting to discuss. How does tomorrow at 9:30 m.s.t work for y'all?

With regards to the EOT, this email will satisfy to set a date for the request, but in order to fully satisfy the requirements, please conduct and AOR analysis to determine if there are any new affected parties, or well penetrations within ½ mi of the well. If there are new parties notify them, if there are new wells, provide the construction details. Once we receive that information we can provide a recommendation for the Director's signature. In the meantime though, I can place this correspondence in the Admin file as a placeholder.

Regards,

Dylan Rose-Coss

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

C: (505) 372-8687



From: David Cain <david.cain@longfellowenergy.com>
Sent: Wednesday, December 21, 2022 3:16 PM
To: Rose-Coss, Dylan, EMNRD <DylanH.Rose-Coss@emnrd.nm.gov>; Steven Buckler

<steven.buckler@longfellowenergy.com>

Cc: Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>; Schaefer, Alana, EMNRD

<Alana.Schaefer@emnrd.nm.gov>; Gebremichael, Million, EMNRD <Million.Gebremichael@emnrd.nm.gov>

Subject: RE: [EXTERNAL] FW: Notification of Protest for Application to Inject: AID State Com #1_Spur Energy Partners

Hi Dylan,

We did run the CBL, but it didn't go high enough to show the top of cement. Steven Buckler, our ops engineer and added to this email, wanted to discuss the operation and get clarification on the cementing requirements. But it's unlikely we will be able to finish the conversion of the well and start injection prior to 1/1/2023. So I am requesting a formal EOT request. (Please let me know if there is a process to do this, as I'm assuming this email request is enough)

Thank you
David Cain

From: Rose-Coss, Dylan, EMNRD <DylanH.Rose-Coss@emnrd.nm.gov>

Sent: Tuesday, December 20, 2022 11:18 AM

To: David Cain <david.cain@longfellowenergy.com>

Cc: Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>; Schaefer, Alana, EMNRD

<Alana.Schaefer@emnrd.nm.gov>; Gebremichael, Million, EMNRD <Million.Gebremichael@emnrd.nm.gov>

Subject: RE: [EXTERNAL] FW: Notification of Protest for Application to Inject: AID State Com #1_Spur Energy Partners

David,

Thanks for the email. Here is our responses:

I wanted to follow up on few things. The first is in regards to the AID State Com 1, it is the SWD-2411 that was previously approved, but we let the permit lapse without extending it. It was resubmitted on 7/23 and the protest was removed on 10/18. Everything on the application was identical to the previously approved application. You mention below that you hope to have it approved this year, is that still plausible?

- *Plausible, but less likely now. I'll see what we can do.*

Second, we are working to schedule our MIT on the Muskegon 20 State Com 1 SWD-2408. We received an extension until 1/1/2023 (see attached), but I want to confirm what constitutes injection to meet the permit requirements? If we pass the MIT and start injecting before the end of the year, do I just need to file the volumes on the C-115 and file the C-103? Or do I need to submit some other form to the OCD? What happens if we can't schedule our MIT until January? Do we need to do a formal extension as outlined in the attached email?

- *I'm not seeing the CBL in the well file? Was one run? The Permit states under C. 2. B.:*
 - *Permittee shall circulate to surface the cement for the surface and intermediate casings. If cement does not circulate on any casing string, Permittee shall run a cement bond log ("CBL") to determine the top of cement, then notify the OCD Engineering Bureau, the appropriate OCD Inspection Supervisor, and submit the CBL prior to continuing with any further cementing on the Well. If the cement did not tie back into next higher casing shoe, Permittee shall perform remedial cement action to bring the cement to a minimum of two hundred (200) feet above the next higher casing shoe.*
 - *It also states that a CBL of production casing shall be provided in the special conditions.*
- On the C-103, include date of injection and a calculated or measured static bottom-hole pressure measurement representative of the completion in the approved injection interval.
- Within 45 days of commencing injection submit a C-105 completion report.
- If injection hasn't commenced by the first; yes, please submit a formal EOT request.

Third, we had the call on 12/7 about the potential of permitting a horizontal SWD. You said you had some links or papers about the SWD modelling you were going to send. I believe it was the Mark Zoebec SWD/faulting simulation. Can you send that over if you have it?

- *I've attached some of the articles I mentioned. There is a paper on the Permian basin, a user manual for the FSP modeling and an exhibit from a case where the FSP was required. Also, here is a link to the case file to see what a complicated hearing looks like:*
- <https://ocdimage.emnrd.nm.gov/imaging//CaseFileView.aspx?CaseNo=20964>

Let me know if you have any questions.

Regards,

Dylan Rose-Coss

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

C: (505) 372-8687



From: David Cain <david.cain@longfellowenergy.com>

Sent: Monday, December 19, 2022 3:57 PM

To: Rose-Coss, Dylan, EMNRD <DylanH.Rose-Coss@emnrd.nm.gov>

Cc: Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>; Schaefer, Alana, EMNRD

<Alana.Schaefer@emnrd.nm.gov>; Gebremichael, Million, EMNRD <Million.Gebremichael@emnrd.nm.gov>

Subject: RE: [EXTERNAL] FW: Notification of Protest for Application to Inject: AID State Com #1_Spur Energy Partners

Hi Dylan and UIC team,

I wanted to follow up on few things. The first is in regards to the AID State Com 1, it is the SWD-2411 that was previously approved, but we let the permit lapse without extending it. It was resubmitted on 7/23 and the protest was removed on 10/18. Everything on the application was identical to the previously approved application. You mention below that you hope to have it approved this year, is that still plausible?

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Third, we had the call on 12/7 about the potential of permitting a horizontal SWD. You said you had some links or papers about the SWD modelling you were going to send. I believe it was the Mark Zoebec SWD/faulting simulation. Can you send that over if you have it?

Thanks,

David Cain

From: Rose-Coss, Dylan, EMNRD <DylanH.Rose-Coss@emnrd.nm.gov>

Sent: Tuesday, October 25, 2022 10:38 AM

To: David Cain <david.cain@longfellowenergy.com>

Cc: Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>; Schaefer, Alana, EMNRD

<Alana.Schaefer@emnrd.nm.gov>; Gebremichael, Million, EMNRD <Million.Gebremichael@emnrd.nm.gov>

Subject: RE: [EXTERNAL] FW: Notification of Protest for Application to Inject: AID State Com #1_Spur Energy Partners

Hi David,

The OCD UIC team is actively reviewing Longfellow applications. Hopefully we can get an app to the signature stage before the end of the year. However, it is challenging to give firm timelines, with the protest removed the app can be moved back into the queue for administrative review (of which there are several hundred).

A staff member will reach out should additional information be necessary to complete a review.

Regards,

Dylan Rose-Coss

Petroleum Specialist

Oil Conservation Division

1220 South St. Francis Drive

Santa Fe, New Mexico 87505

C: (505) 372-8687



From: David Cain <david.cain@longfellowenergy.com>

Sent: Tuesday, October 25, 2022 8:47 AM

To: Rose-Coss, Dylan, EMNRD <DylanH.Rose-Coss@emnrd.nm.gov>

Cc: Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>; Schaefer, Alana, EMNRD <Alana.Schaefer@emnrd.nm.gov>; Thompson, Joseph, EMNRD <Joseph.Thompson@emnrd.nm.gov>; Gebremichael, Million, EMNRD <Million.Gebremichael@emnrd.nm.gov>

Subject: RE: [EXTERNAL] FW: Notification of Protest for Application to Inject: AID State Com #1_Spur Energy Partners

Hi Dylan,

As the protest was removed on 10/18/2022, are you able to provide a timeframe for when this C-108 might be approved? Again, it is the same application that was previously approved.

Thank you,
David Cain

From: Rose-Coss, Dylan H, EMNRD <DylanH.Rose-Coss@state.nm.us>

Sent: Wednesday, August 31, 2022 10:29 AM

To: David Cain <david.cain@longfellowenergy.com>; Brian Wood <brian@permitswest.com>

Cc: Goetze, Phillip, EMNRD <Phillip.Goetze@state.nm.us>; Schaefer, Alana, EMNRD <Alana.Schaefer@state.nm.us>; Thompson, Joseph, EMNRD <Joseph.Thompson@state.nm.us>; Gebremichael, Million, EMNRD <Million.Gebremichael@state.nm.us>

Subject: RE: [EXTERNAL] FW: Notification of Protest for Application to Inject: AID State Com #1_Spur Energy Partners

Mr. Cain,

The OCD UIC team has not received a protest withdrawal from Spur. C-108 approval turnaround times have been taking at least 3 months. I can see that an order on the current template was issued for this well on 3/3/21. That order was not extended and lapsed.

However, because it is a new order, it should be easier for us to turn the application around.

I'll see what we can do once the protest is removed.

Thanks for bringing it to our attention.

Regards,

Dylan Rose-Coss

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

C: (505) 372-8687



From: David Cain <david.cain@longfellowenergy.com>

Sent: Wednesday, August 31, 2022 8:33 AM

To: Rose-Coss, Dylan H, EMNRD <DylanH.Rose-Coss@state.nm.us>; Brian Wood <brian@permitswest.com>

Cc: Goetze, Phillip, EMNRD <Phillip.Goetze@state.nm.us>; Schaefer, Alana, EMNRD <Alana.Schaefer@state.nm.us>;

Thompson, Joseph, EMNRD <Joseph.Thompson@state.nm.us>

Subject: [EXTERNAL] FW: Notification of Protest for Application to Inject: AID State Com #1_Spur Energy Partners

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Hello OCD UIC team,

Spur Energy Partners will be, or has already, withdrawn their protest. Are you able to provide an update on when the C-108 can be approved? As this application is essentially a renewal, I don't expect it to take too long.

Thank you,

David Cain

Engineering Technologist & Regulatory Specialist

Office 214-265-4715

8115 Preston Road, Suite 800, Dallas, TX 75225



From: Brian Wood <brian@permitswest.com>

Sent: Wednesday, August 3, 2022 12:47 PM

To: David Cain <david.cain@longfellowenergy.com>

Subject: Fwd: Notification of Protest for Application to Inject: AID State Com #1_Spur Energy Partners

Begin forwarded message:

From: "Rose-Coss, Dylan H, EMNRD" <DylanH.Rose-Coss@state.nm.us>

Date: August 3, 2022 at 9:52:46 AM MDT

To: Brian Wood <brian@permitswest.com>

Cc: "Schaefer, Alana, EMNRD" <Alana.Schaefer@state.nm.us>, "Goetze, Phillip, EMNRD"

<Phillip.Goetze@state.nm.us>, "Thompson, Joseph, EMNRD"

<Joseph.Thompson@state.nm.us>, Sarah Chapman <schapman@spurenergy.com>

Subject: Notification of Protest for Application to Inject: AID State Com #1_Spur Energy Partners

RE: AID State Com No. 1 (API 30-015-24076; Admin. Appl. No pJZT2220953349; SWD-2501)

Mr. Wood,

The OCD was notified by Spur Energy Partners, LLC 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, Longfellow Energy, LP 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 reach out with any questions.

Contact for Spur Energy Partners, LLC:

Sarah Chapman
Regulatory Director
SPUR ENERGY PARTNERS LLC
9655 Katy Freeway, Suite 500 | Houston, TX 77024
Cell: (281) 642-5503
Direct: (832) 930-8613
Office: (832) 930-8502
schapman@spurepllc.com

Regards,

Dylan Rose-Coss

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