BW – 8

CLOSURE PLAN

2019

Chavez, Carl J, EMNRD

From: Ayarbe, John <jayarbe@geo-logic.com>
Sent: Wednesday, March 27, 2019 8:50 AM
To: Chavez, Carl J, EMNRD
Cc: 'Pieter Bergstein (pieter@bergsteinenterprises.com)'; 'susan@thestandardenergy.com'; 'vincent@thestandardenergy.com'; Griswold, Jim, EMNRD; Gallegos, Denise, EMNRD
Subject: [EXT] RE: Submittal of Closure Plan and Brine Well P&A Plan, Salty Dog Brine Station

Thanks, Carl! We appreciate the quick review and response.

John P. Ayarbe
Senior Hydrogeologist

Daniel B. Stephens & Associates, Inc.
a Geo-Logic Company
Direct: (505) 353-9137
Mobile: (505) 280-4339

From: Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]
Sent: Wednesday, March 27, 2019 8:49 AM
To: Ayarbe, John
Cc: 'Pieter Bergstein (pieter@bergsteinenterprises.com)'; 'susan@thestandardenergy.com'; 'vincent@thestandardenergy.com'; Griswold, Jim, EMNRD; Gallegos, Denise, EMNRD
Subject: RE: Submittal of Closure Plan and Brine Well P&A Plan, Salty Dog Brine Station

John,

- Re: BW-8 PAB Services, Inc. (formerly Standard Energy) Brine Supply Well #1 API# 30-025-26307

The New Mexico Oil Conservation Division (OCD) has completed its review of the "Closure Plan and Brine Well Plugging and Abandonment Plan Salty Dog Brine Station Lea County, New Mexico" dated March 22, 2019.

The Closure Plan Amount of $573,430.00 is hereby **approved**.

Please contact Denise Gallegos at (505) 476-3453 for any questions regarding the new WQCC Bond Amount and/or submittal.

Thank you.

Mr. Carl J. Chavez, CHMM (#13099)
New Mexico Oil Conservation Division
Energy Minerals and Natural Resources Department
1220 South St Francis Drive
Santa Fe, New Mexico 87505

Ph. (505) 476-3490
E-mail: CarlJ.Chavez@state.nm.us
"Why not prevent pollution, minimize waste to reduce operating costs, reuse or recycle, and move forward with the rest of the Nation?" (To see how, go to: http://www.emnrd.state.nm.us/OCD and see "Publications")

From: Ayarbe, John <jayarbe@geo-logic.com>
Sent: Monday, March 25, 2019 3:03 PM
To: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>
Cc: 'Pieter Bergstein (pieter@bergsteinenterprises.com)' <pieter@bergsteinenterprises.com>; 'susan@thestandardenergy.com' <susan@thestandardenergy.com>; 'vincent@thestandardenergy.com' <vincent@thestandardenergy.com>
Subject: [EXT] Submittal of Closure Plan and Brine Well P&A Plan, Salty Dog Brine Station

Hi Carl,

Attached is the Closure Plan and Brine Well Plugging and Abandonment Plan for the Salty Dog Brine Station. I'm submitting the document to you on behalf of PAB Services, Inc. and to support the renewal of the brine well discharge permit. Section 7 of the document presents a FA cost estimate. Once approved, we'll work with PAB on the WQCC bond and release of the existing bond.

Please let me know if you have questions.

Sincerely,

John P. Ayarbe
Senior Hydrogeologist

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Closure Plan and Brine Well Plugging and Abandonment Plan Salty Dog Brine Station Lea County, New Mexico

Prepared for **New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division**

March 22, 2019

Daniel B. Stephens & Associates, Inc.

6020 Academy NE, Suite 100 • Albuquerque, New Mexico 87109

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Closure Plan and Brine Well Plugging and Abandonment Plan
Salty Dog Brine Station, Lea County, New Mexico

1. Introduction

Daniel B. Stephens & Associates, Inc. (DBS&A) has prepared this closure plan and brine well plugging and abandonment plan for submission to the New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division (OCD) Environmental Bureau on behalf of PAB Services, Inc. (PAB) for the Salty Dog Brine Station (the site) located in Lea County, New Mexico (Figure 1). This closure plan is being submitted in support of renewal of discharge permit BW-8 (DP BW-8) and development of a cost estimate for closure. A permit renewal application was submitted to OCD on July 2, 2018.

Submittal of this closure and brine well plugging and abandonment plan is intended to meet the requirements of Subsection A of 20.6.2.5209 NMAC and to provide protection of groundwater quality pursuant to 20.6.2.3109 NMAC, 20.6.2.5101 NMAC, and 20.6.2.5005 NMAC. If necessary or requested by OCD, a revised or updated plan will be submitted for approval before implementation of closure activities. PAB understands that the obligation to implement and the requirements of this plan survive the termination or expiration of DP BW-8.

2. Pre-Closure Notification

Pursuant to 20.6.2.5005A NMAC, PAB will submit a pre-closure notification to OCD at least 30 days before they close or discontinue operation of the site's brine well, a UIC Class III well (API No. 30-025-26307). Pursuant to 20.6.2.5005B NMAC, OCD must approve all proposed well closure activities before they may be implemented.

The pre-closure notification will include the following:

- *Name of facility:* Salty Dog Brine Station

- *Address of facility:* The Salty Dog Brine Station is located approximately 11 miles west of Hobbs, New Mexico along U.S. Highway 62/180 (US 62/80), about 0.5 mile east of the US 62/180 and 529 intersection.
- *Name of Permittee (and owner or operator, if appropriate):* PAB Services, Inc.
- *Address of Permittee (and owner or operator, if appropriate):* PO Box 2724 Lubbock, TX 79408
- *Contact person:* Pieter Bergstein
- *Phone number:* (806) 741-1080
- *Number and type of well(s):* UIC Class III well (Brine Supply Well #1 [API No. 30-025-26307])
- *Year of well construction:* 1979
- *Well construction details:* 8⅝-inch-diameter casing to 1,877 feet below ground surface (feet bgs); 4½-inch-diameter liner to 1,877 feet bgs; 6¼-inch open hole to 2,958 feet bgs; 0.20-inch perforations from 2,590 to 2,592 feet bgs; 2⅞-inch tubing to 2,610 feet bgs
- *Type of discharge:* Brine supply well
- *Average flow (gallons per day):* Approximately 71,000 gallons per day (gpd), based on 2017 brine production
- *Proposed well closure activities:* Plug well with cement, remove facilities, regrade and reseed disturbed areas to match natural surroundings, extract and monitor chloride-impacted groundwater, and conduct subsidence monitoring
- *Proposed date of well closure:* To be determined (TBD)
- *Proposed method and date of surface restoration:* Remove facilities and regrade and reseed disturbed areas to match natural surroundings; date TBD

- *Proposed method and date of pipeline abandonment:* Pipelines will be removed; date TBD
- *Name of pre-closure notification preparer:* TBD
- *Date pre-closure notification:* TBD

3. Brine Well Plugging and Abandonment

The brine well will be abandoned by placing a plug at the bottom of the 4.5-inch-diameter liner and then filling the liner with neat cement to the ground surface. Tremie pipe will be used to place the neat cement. A New Mexico licensed driller will perform all plugging and abandonment activities and will plug the brine well in accordance with 20.6.2.5209 NMAC. After the brine well is plugged, all surface casing will be cut flush with the ground surface. If requested by OCD, PAB will submit a revised or updated well plugging and abandonment plan for approval prior to closure.

Figure 2 shows a schematic of the brine well that includes an illustration of the underlying geology. The annular spaces between the 8⅝-inch-diameter casing and 4½-inch-diameter liner are sealed with cement. Therefore, only the plugging of the 4½-inch-diameter liner is necessary.

4. Land Surface Restoration and Facilities Removal

All brine production and sales facilities will be removed after closure of the site, unless a facility is needed for storage and/or conveyance of chloride-impacted groundwater. Brine production and sales facilities include the following:

- Six 750-barrel (bbl) aboveground storage tanks (ASTs)
- Concrete truck loading pad
- Two brine filling stations
- Operations shed

- Pipelines, including the brine well conveyance pipeline

Figure 1 shows the locations of the site facilities. Produced brine ready for sale is stored in a bermed tank battery consisting of six 750-bbl ASTs that are constructed of fiberglass. Produced brine is conveyed via a 3-inch-diameter high-density polyethylene (HDPE) pipeline from the brine well to the tank battery. The conveyance pipeline runs along the ground surface. Brine is sold at the operations shed, which is located adjacent to the brine filling stations.

The brine production, storage, and sales facilities will be moved off-site, and the brine well will be plugged and abandoned as described in Section 3. It is expected that the six 750-bbl ASTs can either be used by PAB at another facility or can be sold to another oil-field operator. Other facilities will likely be demolished, and the materials transported to a licensed disposal facility. As practical, some materials may be salvaged for reuse or recycling, or may be sold.

After the brine production and sales facilities are removed, disturbed areas will be regraded and reseeded to match surrounding conditions. The goal of reseeding is to establish a plant community that is consistent with the local natural vegetation.

Roads are expected to remain in place, as they are used by locals (e.g., ranchers) and residents.

5. Groundwater Extraction and Monitoring

Salty Dog is addressing groundwater impacts resulting from releases at the brine well and a former brine pond (Figure 1). A hole in the casing of the brine well at 250 feet bgs was discovered in 1999 (Salty Dog, 1999). The hole released brine, impacting groundwater; it was repaired in August 1999 by installing the 4½-inch-diameter casing liner (Salty Dog, 1999). In October 2008, the brine pond was removed and impacted soil was excavated and disposed of (DBS&A, 2008).

Two chloride plumes currently exist at the site: one in the area of the brine station (i.e., the former brine pond area) and a second near the brine well (brine well area). In May 2008, OCD issued an Administrative Compliance Order (ACO) (ACO-2008-02) to Salty Dog to address

chloride-impacted groundwater at the site. In 2009, PAB initiated groundwater extraction to remove and provide hydraulic containment of chloride-impacted groundwater (DBS&A, 2009a and 2009b).

Groundwater monitoring and extraction data are reported and evaluated in reports submitted to OCD. The data include water levels and water quality (i.e., chloride concentrations) at site monitor wells. Site monitor wells are shown in Figure 3. Groundwater monitoring is currently conducted at 13 wells, as follows:

- Former Brine Pond Area: DBS-1R, DBS-2 through DBS-5, and PMW-1
- Brine Well Area: DBS-6, DBS-8 through DBS-10, MW-3, MW-5, and MW-6

Monitoring data show that groundwater extraction is effective at providing hydraulic containment of the chloride plumes (DBS&A, 2018b). The current groundwater extraction systems include pumping from wells FWS-1 (former brine pond area) and RW-2 (brine well area). Extracted groundwater is currently used as injection water at the brine well.

Groundwater extraction and monitoring will continue for five years post closure. The groundwater extraction rate is assumed to be approximately 15.5 gallons per minute (gpm). Monitoring data show that groundwater quality has improved since the initial discovery of the water quality impacts (DBS&A, 2018b). The initial rate (15.5 gpm) is based on capture zone analyses conducted to determine the pumping rates required for containment of the chloride plumes in both the former pond area and brine well area (DBS&A, 2009b). Post-closure operation of the groundwater extraction systems will continue by pumping from wells FSW-1 and RW-2 and then conveying the extracted groundwater to the existing six 750-bbl aboveground storage tanks at the brine tank battery (Figure 1), where it can be transferred to tanker trucks.

It is expected that the extracted groundwater can be provided to local oil field operators, as there is a demand for fresh water in the Hobbs area. Although the chloride and total dissolved solids (TDS) concentrations are elevated above New Mexico Water Quality Control Commission standards, the water is of adequate quality to be reused in oil field operations in accordance

with 19.15.34.8 NMAC. Typical applications include use in drilling and fracking fluids. Salty Dog currently sells fresh water obtained from FWS-1 to oil field operators, contractors, and trucking companies (Appendix B). In 2018, the average chloride and TDS concentrations of this fresh water were 415 and 1,011 milligrams per liter (mg/L), respectively. Prices for the fresh water provided by Salty Dog are expected to be reduced or eliminated in order to encourage disposition of the water for appropriate reuse in the oil field.

6. Surface Subsidence Monitoring

In March 2018, Salty Dog installed five permanent subsidence monitoring points in the vicinity of the brine well, as shown in Figure 4 (DBS&A, 2018a). The elevations of the subsidence monitoring points are surveyed on a semiannual basis by a licensed surveyor. Surface subsidence monitoring will continue for two years post closure.

7. Financial Assurance Cost Estimate

This plan was prepared to support the development of a financial assurance cost estimate pursuant to 20.6.2.5210B(17) NMAC. The estimated cost for closure of the Salty Dog brine well and ancillary facilities is $573,430 (including NMGRT), as summarized in Table 1. Detailed costs are provided in Appendix A, including costs for monitoring, extraction, and handling of chloride-impacted groundwater. The cost estimate is based on unit rates obtained from RS Means (2017), contractors, and vendors, and, as necessary, approximated based on professional experience.

Table 1. Estimated Closure Costs

Item	Cost
Brine well plugging and abandonment	$53,244
Land surface restoration and facilities removal	$77,406
Groundwater monitoring, extraction, and handling (5 years post closure)	$436,884
Surface subsidence monitoring (2 years post closure)	$5,896
Total	$573,430

References

Daniel B. Stephens & Associates, Inc. (DBS&A). 2008. *Closure report, brine pond and loading area, Salty Dog Brine Station, Lea County, New Mexico.* Prepared for the New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division, Environmental Bureau, Santa Fe, New Mexico. December 3, 2008.

DBS&A. 2009a. *Recovery well installation and pump test report, Salty Dog Brine Station, Lea County, New Mexico*. Prepared for the New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division, Environmental Bureau, Santa Fe, New Mexico. November 20, 2009.

DBS&A. 2009b. *Preliminary conceptual remedial design report, Salty Dog Brine Station, Lea County, New Mexico*. Prepared for the New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division, Environmental Bureau, Santa Fe, New Mexico. December 31, 2009.

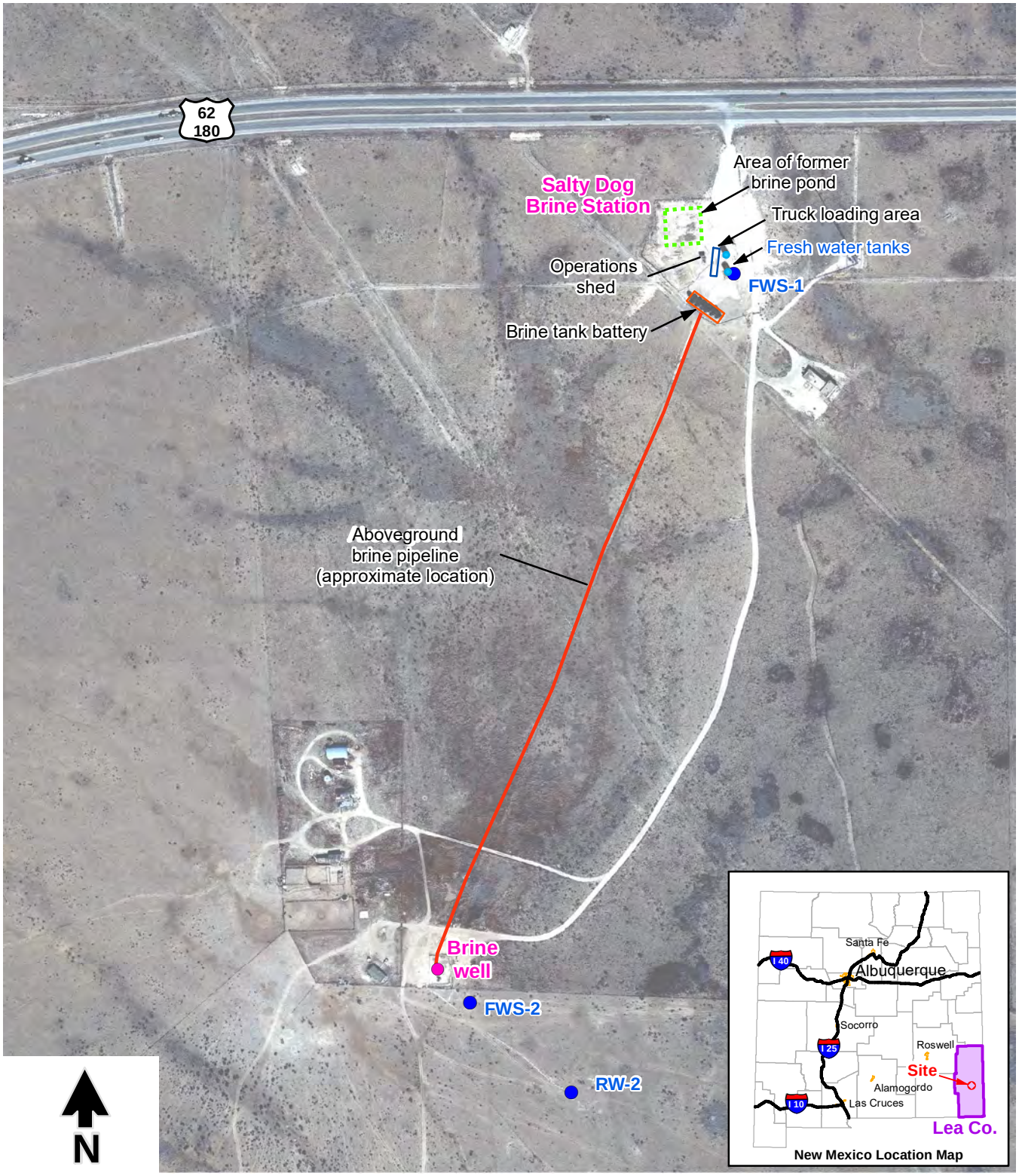
DBS&A. 2018a. Letter from John Ayarbe and Michael D. McVey to Carl Chavez, New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division, regarding Installation of monitor well and subsidence survey monitoring points, Salty Dog Brine Station (API No. 30-025-26307). June 25, 2018.

DBS&A. 2018b. *Semiannual groundwater monitoring and O&M report, January 1 through June 30, 2018, Salty Dog Brine Station, Lea County, New Mexico*. Prepared for the New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division, Environmental Bureau, Santa Fe, New Mexico. September 18, 2018.

Salty Dog, Inc. (Salty Dog). 1988. Letter report outlining facility data for quarter ending September 1987. February 25, 1988.

Salty Dog. 1999. Form C-103 report on Brine supply well #1. Submitted September 8, 1999. Approved by OCD December 1, 1999.

Figures



Source: USDA Farm Service Agency
DigitalGlobe, NMRGIS
February 14, 2014

Explanation

- Injection water supply well
- Brine well
- Fresh water tank

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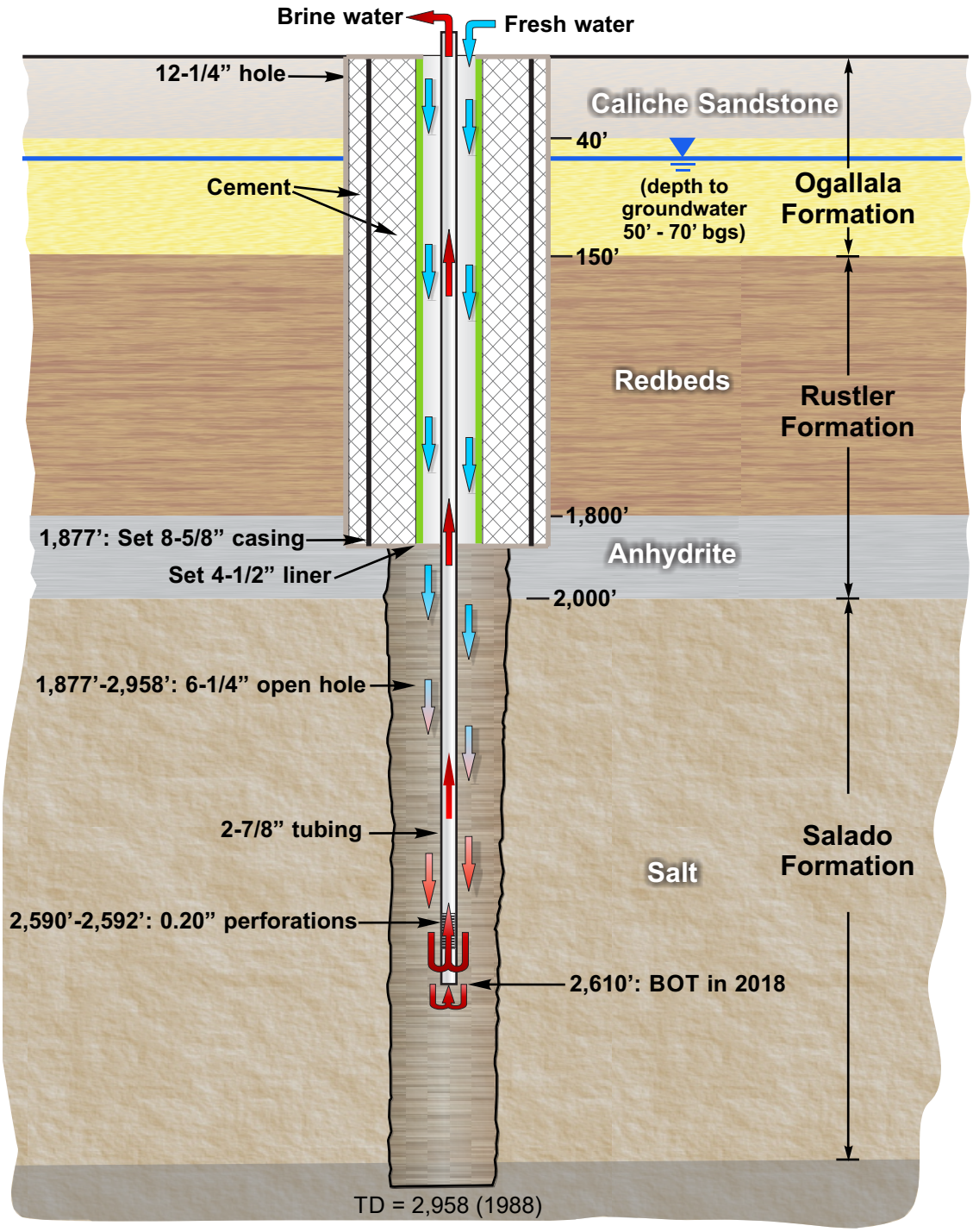
Daniel B. Stephens & Associates, Inc.
12/14/2018
JN ES08.0118.06

SALTY DOG BRINE STATION
Site Location and Facilities

Figure 1

Salty Dog Brine Well



Notes:

1. BOT = Bottom of tubing
2. Figure not to scale

Sources:

1. Completion data based on OCD well reports
2. Lithology from Salty Dog (1988)

SALTY DOG BRINE STATION

Generalized Brine Well Schematic

Daniel B. Stephens & Associates, Inc.

12-6-18 JN ES08.0118.06

Figure 2

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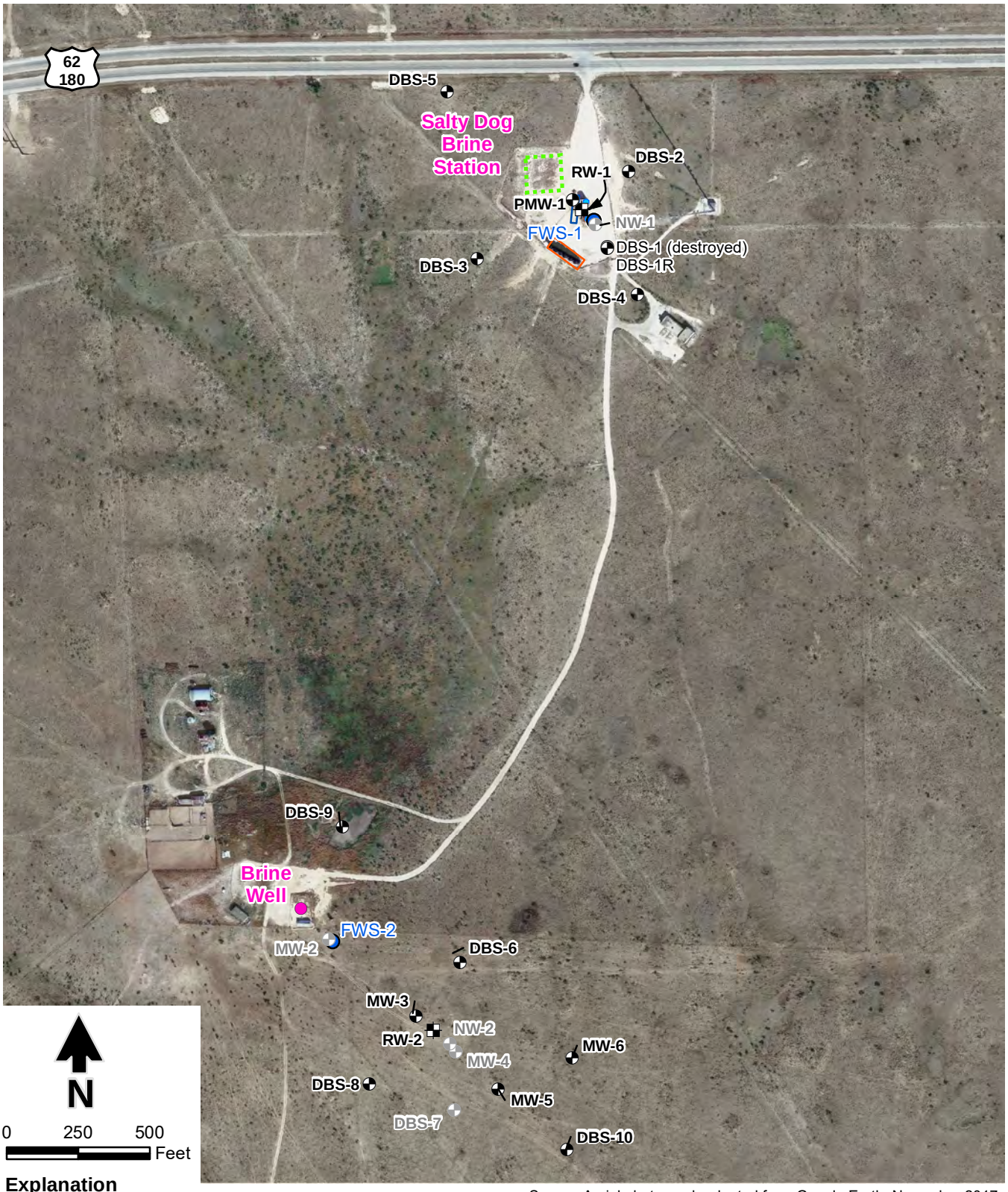


Explanation

- Fresh water supply well
- Monitor well
- Recovery well
- Well destroyed
- Well not monitored
- Brine well
- Brine tank battery
- Truck loading area
- Former brine pond

Source: Aerial photograph adapted from Google Earth, November 2017.

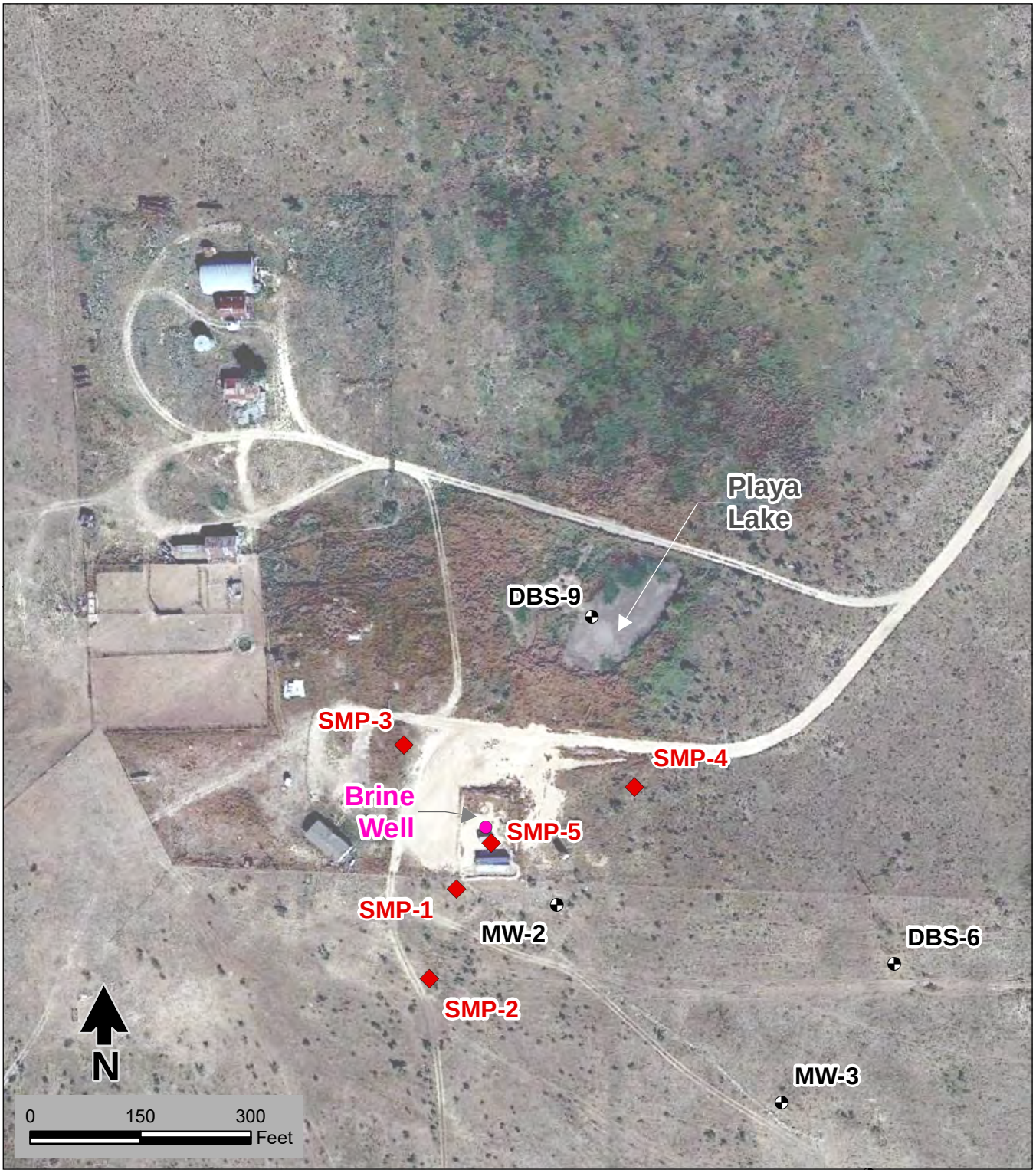
S:\PROJECTS\ES08.0118_SALTY_DOG_2018\GIS\MXD\CLOSURE_PLAN\FIG03_SITE_MONITOR_AND_EXTRACTION_WELL_LOCS.MXD

Daniel B. Stephens & Associates, Inc.
12/14/2018
JN ES08.0118.06

SALTY DOG BRINE STATION

Monitor and Extraction Well Locations

Figure 3



Source: Google Earth aerial photograph dated November 2017

Explanation

- Survey monument
- Monitor well
- Brine well

SALTY DOG BRINE STATION

Surface Subsidence Monitoring Locations

Daniel B. Stephens & Associates, Inc.

12/17/2018 JN ES08.0118.01

Figure 4

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Appendix A

Financial Assurance Cost Estimate

Salty Dog Brine Station

Estimated Closure Costs

Item	Cost
Brine Well Plugging and Abandonment	$ 53,244
Land Surface Restoration and Facilities Removal	$ 77,406
Groundwater Extraction and Monitoring	$ 436,884
Surface Subsidence Monitoring	$ 5,896
Subtotal	**$ 573,430**

Estimated Closure Costs

Salty Dog Brine Station

Brine Well Plugging and Abandonment

Engineer's Opinion of Probable Cost

Item No	Description	Quantity	Unit	Unit Price	Extended Price
1	Contractor Mobilization/Demobilization	1	%	6%	$ 2,000
2	Brine Well Plugging and Abandonement, inside 4.5-inch diameter liner	1877	LF	$ 20	$ 37,540
3	Cut surface casing and restore land surface conditions	1	LS	$ 2,000	$ 2,000
	Subtotal				**$ 41,540**
4	*Contingency*	*$ 41,540*	*%*	*20%*	*$ 8,308*
	Subtotal				**$ 49,848**
5	*NMGRT*	*$ 49,848*	*%*	*6.8125%*	*$ 3,395.90*
	Grand Total Costs				**$ 53,244**

Estimated Closure Costs

Salty Dog Brine Station

Land Surface Restoration and Facilities Removal

Engineer's Opinion of Probable Cost

Item No	Description	Quantity	Unit	Unit Price	Extended Price
1	Contractor Mobilization/Demobilization	1	%	6%	$ 3,000
2	Remove and dispose of 3-inch diameter HDPE conveyance pipeline	2500	LF	$ 4	$ 9,325
3	Remove six 750-barrel aboveground storage tanks (ASTs)	6	EA	$ 2,500	$ 15,000
4	Remove and dispose of concrete pad, filling station, operation shed	1	LS	$ 10,000	$ 10,000
5	Remove and dispose other miscellaneous	1	LS	$ 2,500	$ 2,500
6	Regrading and reseeding	2	AC	$ 10,283	$ 20,566
	Subtotal				**$ 60,391**
7	*Contingency*	*$ 60,391*	*%*	*20%*	*$ 12,078.11*
	Subtotal				**$ 72,469**
8	*NMGRT*	*$ 72,469*	*%*	*6.8125%*	*$ 4,936.93*
	Grand Total Costs				**$ 77,406**

Estimated Closure Costs

Salty Dog Brine Station

Groundwater Extraction and Monitoring

Engineer's Opinion of Probable Cost

Item No	Description	Quantity	Unit	Unit Price	Extended Price
1	Laboratory cost for chloride analysis, 13 monitor wells sampled semiannually for 5 years	10	EA	$ 350	$ 3,500
2	Technician, monitor 13 wells semiannually for 5 years	10	EA	$ 2,400	$ 24,000
3	Groundwater pumping	5	YR	$ 270	$ 1,350
4	O&M labor	60	Month	$ 5,200	$ 312,000
	Subtotal				**$ 340,850**
5	*Contingency*	*$ 340,850*	*%*	*20%*	*$ 68,170*
	Subtotal				**$ 409,020**
6	*NMGRT*	*$ 409,020*		*6.8125%*	*$ 27,864*
	Grand Total Costs				**$ 436,884**

Estimated Closure Costs

Salty Dog Brine Station

Surface Subsidence Monitoring

Engineer's Opinion of Probable Cost

Item No	Description	Quantity	Unit	Unit Price	Extended Price
1	Contractor Mobilization/Demobilization	1	%	6%	$ 1,000
2	Survey surface subsidence monitoring points	4	EA	$ 900	$ 3,600
	Subtotal				**$ 4,600**
3	*Contingency*	*$ 4,600*	*%*	*20%*	*$ 920*
	Subtotal Capital Costs				**$ 5,520**
6	*NMGRT*	*$ 5,520*		*6.8125%*	*$ 376*
	Grand Total Costs				**$ 5,896**

Appendix B

Salty Dog
2018 Fresh Water Sales

Salty Dog Fresh Water Sales

Customer	# BBLs
ACD OILFIELD SERVICES LLC - Item: FW-01 - Fresh Water Total	120.00
ALLIANCE TRUCKING - Item: FW-01 - Fresh Water Total	100.00
AMERICAN SAFETY SERVICES INC Total	1,022.08
APSI - Item: FW-01 - Fresh Water Total	330.00
BAKER HUGHES PETROLITE - Item: FW-01 - Fresh Water Total	14,282.00
BASIC ENERGY #1208 - EUNICE - Item: FW-01 - Fresh Water Total	785.00
BCM AND ASSOCIATES - Item: FW-01 - Fresh Water Total	1,140.00
BLACK RIVER TRUCKING - Item: FW-01 - Fresh Water Total	100.00
BLADE SERVICES - Item: FW-01 - Fresh Water Total	130.00
C & C TRANSPORT LLC - Item: FW-01 - Fresh Water Total	920.00
C & J ENERGY SERVICES - Item: FW-01 - Fresh Water Total	2,670.00
CHARLIE'S TRUCKING - Item: FW-01 - Fresh Water Total	100.00
CHEMICAL SERVICES - Item: FW-01 - Fresh Water Total	4,340.00
CHEMICAL WEED CONTROL - Item: FW-01 - Fresh Water Total	6.00
CHOICE OILFIELD SERVICES - Item: FW-01 - Fresh Water Total	610.00
CREDO ENERGY SERVICES - CES - Item: FW-01 - Fresh Water Total	370.00
CUATRO TRANSPORTATION INC - Item: FW-01 - Fresh Water Total	340.00
DAWSON GEOPHYSICAL - Item: FW-01 - Fresh Water Total	85.70
DE LA SIERRA TRUCKING - Item: FW-01 - Fresh Water Total	130.00
DMC OILFIELD SERVICES - Item: FW-01 - Fresh Water Total	645.00
ENERGY SERVICE CO- ESCO - Item: FW-01 - Fresh Water Total	90.00
EXTREME SERVICES - Item: FW-01 - Fresh Water Total	1,150.00
FRAC TANK RENTALS LLC-TWO STAT - Item: FW-01 - Fresh Water Total	2,695.00
GEOMECHANICS SOUTHWEST INC. - Item: FW-01 - Fresh Water Total	348.00
GLOBE ENERGY - ARTESIA - Item: FW-01 - Fresh Water Total	2,545.00
HYDROSTEAM - Item: FW-01 - Fresh Water Total	180.00
IMPACT CHEMICAL TECHNOLOGIES - Item: FW-01 - Fresh Water Total	940.00
JES - Item: FW-01 - Fresh Water Total	130.00
KEY ENERGY - #407 - EUNICE - Item: FW-01 - Fresh Water Total	200.00
KILL IT SERVICES - Item: FW-01 - Fresh Water Total	130.00
KODIAK OILFIELD SERVICES - Item: FW-01 - Fresh Water Total	1,300.00
LEGENDARY LLC - Item: FW-01 - Fresh Water Total	80.00
LIONS TRANSPORT CORP - Item: FW-01 - Fresh Water Total	125.00
M & S SERVICE INC - Item: FW-01 - Fresh Water Total	1,424.00
MACLASKEY OILFIELD SERVICES - Item: FW-01 - Fresh Water Total	72.00
MAVERICK SERVICES - Item: FW-01 - Fresh Water Total	1,800.00
MULLHOLLAND ENERGY SERVICES - Item: FW-01 - Fresh Water Total	50.00
MVA TRUCKING & RENTALS LLC - Item: FW-01 - Fresh Water Total	120.00
NALCO CHAMPION - HOBBS - Item: FW-01 - Fresh Water Total	5,386.00
NOVA MUD, INC. - Item: FW-01 - Fresh Water Total	260.00
OMEGA TREATING CHEMICALS - Item: FW-01 - Fresh Water Total	410.00
ONE CALL LOGISTICS LLC - Item: FW-01 - Fresh Water Total	100.00
ONO'S SANDBLASTING - Item: FW-01 - Fresh Water Total	148.00
PATE TRUCKING COMPANY LLC - Item: FW-01 - Fresh Water Total	2,280.00
PENASCO SERVICES LLC - Item: FW-01 - Fresh Water Total	150.00
PRESTIGE OILFIELD SERVICE - Item: FW-01 - Fresh Water Total	380.00
PRODUCTION & ENVIRONMENTAL SER - Item: FW-01 - Fresh Water Tota	17.00
R & M TRUCKING - Item: FW-01 - Fresh Water Total	250.00
RAMIREZ ROUSTABOUT LLC - Item: FW-01 - Fresh Water Total	610.00
RANGER SERVICES - Item: FW-01 - Fresh Water Total	340.00
REDLINE HOTSHOT - Item: FW-01 - Fresh Water Total	120.00
ROCKIN 8 SERVICES - Item: FW-01 - Fresh Water Total	120.00
STANDARD ENERGY SERVICES - Item: FW-01 - Fresh Water Total	21,387.00
STONE OILFIELD SERVICE - Item: FW-01 - Fresh Water Total	1,555.00
STRAUB CORP - Item: FW-01 - Fresh Water Total	285.00
TANMAR COMPANIES, LLC - Item: FW-01 - Fresh Water Total	130.00

Customer	# BBLs
TEX MEX RENTALS - Item: FW-01 - Fresh Water Total	220.00
TEXAS LOBO TRUCKING LLC - Item: FW-01 - Fresh Water Total	806.00
TFH LTD COMPANY - Item: FW-01 - Fresh Water Total	860.00
TIGER OF THE NORTH TRANSPORTAT - Item: FW-01 - Fresh Water Total	130.00
TORRES TRUCKING - Item: FW-01 - Fresh Water Total	60.00
TRACKER ENERGY - Item: FW-01 - Fresh Water Total	214.25
TRIDENT OILFIELD SERVICES - Item: FW-01 - Fresh Water Total	240.00
TRM LLC - Item: FW-01 - Fresh Water Total	185.00
UNITED WELL SERVICES - Item: FW-01 - Fresh Water Total	850.00
VAZQUEZ TRUCKING - VTI - Item: FW-01 - Fresh Water Total	360.00
VMJ OILFILED SERVICES - Item: FW-01 - Fresh Water Total	490.00
WEST TEXAS BORING - Item: FW-01 - Fresh Water Total	120.00
WINDMILL TRUCKING - Item: FW-01 - Fresh Water Total	1,455.00
ZH SERVICES INC - Item: FW-01 - Fresh Water Total	340.00
Grand Total	**81,863.03**