

**BW-31**

**COMPLIANCE  
REVIEW**

**2022**

**From:** [Chavez, Carl J., EMNRD](#)  
**To:** [Gary Schubert](#)  
**Cc:** [Goetze, Phillip, EMNRD](#); [Powell, Brandon, EMNRD](#)  
**Subject:** Compliance Review BW-31  
**Date:** Wednesday, March 23, 2022 3:49:00 PM  
**Attachments:** [BW-31 DP.pdf](#)

Mr. Schubert:

Re: Discharge Permit Deliverables

Permit	Facility Name	Expiration	Facility ID#	OGRID#	Present	Active	Operator	Well Name	API#	MIT Date
<a href="#">BW-31</a>	BW-31 HRC Schubert '7' #1	1/23/2024	fLWP0601059962	131652	Y	A	HRC, Inc.	HRC Schubert 7 #1	30-025-36781	3/16/21

Good afternoon!

The New Mexico Oil Conservation Division (OCD) has completed a review of the administrative record for the above subject brine well facility. The attached OCD Discharge Permit was issued to HRC, Inc. (HRC). Consequently, OCD is directing this message to you for further communication(s) on this message.

Based on a compliance review of the administrative record, OCD hereby requires the following deliverables to be submitted via E-Permitting within 90-days from today's date or by COB on June 23, 2022 except as indicated below.

- Condition 2.A (Quarterly Monitoring Requirements): No brine nor groundwater monitor well data results submitted since 2019.
- Conditions 2.A.1 & 2.H.3 (Groundwater Monitoring Well): Water well used as monitoring well.
- Condition 2.B.1 & 5.C (Semi-Annual Survey Results): Not submitted since September 2020. OCD must receive or see the actual survey results from the surveyor in annual reports.
- Condition 2.B.2 & 5.D (Solution Cavern Characterization Program): Not submitted since 2019. The salt cavern was deepened and a new well diagram is required.
- Condition 2.B.3 (Annual Certification): Not submitted since 2019.
- Condition 2.J & 5.A (Annual Report): Not submitted since 2019.
- Condition 3.F (Fluids Injection & Brine Production Pressures/Vols.): Not submitted since 2019. Complete brine production with injection pressures and cumulative production volumes are required and for the solution cavern characterization and maturity assessments.
- Condition 3.G (Area of Review): No updates submitted since 2019.

As per Permit Condition 1.I (Compliance and Enforcement), any required items that are not received by June 23, 2022 become subject to this provision of the brine well permit.

OCD Management has been copied on this e-mail message and may chime-in as needed.

Please contact me if you have questions.

Thank you.

**Carl J. Chavez** • UIC Group  
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