

From: [McClure, Dean, EMNRD](#)
To: [Seth Arnaud](#); [Michael Rodriguez](#)
Cc: [Wrinkle, Justin, EMNRD](#); [Clelland, Sarah, EMNRD](#)
Subject: Civitas Multiphase Flow Meters
Date: Wednesday, March 12, 2025 2:42:00 PM

Seth,

The Division is prepared to grant Civitas authority to allocate using multiphase flow meters (MPFM) in lieu of test separators. This approval will meet the condition in 19.15.12.10 B.(1)(e) NMAC that an alternative allocation method be specifically approved by the Division prior to commingling. For each surface commingling application that Civitas wishes to use this allocation method in, it will need to reference the approval, once granted, and include a summary of all the associated stipulations.

Please submit a sundry as a C-103X. The sundry may be submitted to a well within the first commingling project that Civitas intends to propose this allocation method. Attached to that sundry should be a summary of Civitas's request on letter head. To receive approval from the Division, the request should include paragraphs detailing the following:

- Civitas is requesting the use of MPFM in lieu of test separators with the following stipulations:
 - when ownership of all production in the commingling project is identical as defined 19.15.12.7 B. NMAC;
 - the MPFM used will be an appropriately sized Schlumberger's Vx Spectra line of MPFM as was described to the Division and used to produce the data sets provided to the Division to determine accuracy of the MPFM;
 - maintenance shall be done in accordance with Schlumberger's guidance and as laid out in the table provided to the Division [INCLUDE THE TABLE] or in accordance with 19.15.12.10 C. NMAC, whichever is more frequent;
 - should Schlumberger or API Standards cause the recommended maintenance to change, Civitas will provide the Division with that updated maintenance schedule and await the Division's approval prior to making any modifications to its maintenance schedule; and
 - SCADA shall be installed and monitored to determine if the MPFM needs additional calibration and make corrections and adjustments in accordance with 19.15.12.10 C.(2)(c) NMAC except that Civitas shall use the data gathered by its SCADA to determine a date to correct production for in lieu of the last half of the period elapsed since the last calibration date;
 - Included should be a written summary regarding how Civitas is going to use the data gathered by its SCADA to make a determination that

additional calibration is necessary. The written summary should include details such as which parameters will be monitored and how they will be used.

If you have any questions, please feel free to reach out. Once submitted, please email me the action ID.

Dean McClure
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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
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Santa Fe, NM 87505

CONDITIONS

Action 496888

CONDITIONS

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| Operator: Civitas Permian Operating, LLC 555 17th Street Denver, CO 80202 | OGRID: 332195 |
| | Action Number: 496888 |
| | Action Type: [IM-SD] Admin Order Support Doc (ENG) (IM-AAO) |

CONDITIONS

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| Created By | Condition | Condition Date |
| dmcclure | None | 8/18/2025 |