

**March 15, 2024 Compliance Up-date by Price LLC for Wasserhund Inc.
Wasserhund Response in RED.**

W P

From: Chavez, Carl, EMNRD
To: Jon Gandy
Cc: Goetze, Phillip, EMNRD; Gebremichael, Million, EMNRD; Wrinkle, Justin, EMNRD
Subject: RE: [EXTERNAL] Good afternoon Mr. Chavez. It's with a very heavy heart that Mr. Price do too health issues will no longer be doing my compliance duties for the state. Wish him the very best. Wayne had no one to recommend... I've have reached out to se
Date: Tuesday, August 8, 2023 12:16:00 PM
Attachments: [OCD Responses to Permittee Correspondence 7-19-23.pdf](#)

Mr. Jon Gandy,

Re.: Administrative Record Review & Attached Responses to Permittee Correspondence from 2022

Permit	Facility Name	Expiration	Facility ID#	OGRID#	Permit	Active	Operator	Well Name	API#
BW-4	BW-4 Eidson State #1	12/26/2024	fCJC2116630149	118677/130851	DP-321	A	Wasserhund, Inc	Eidson State #1	30-025-26883

Good afternoon!

The New Mexico Oil Conservation Division (OCD) recently completed a review of the Administrative Record for the above brine well facility.

It is important to note that OCD has historically responded to most "modification" and "waiver" requests with the exception of the attached document above. However, nothing has changed from historical permits to present on the OCD permit requirements.

In addition, OCD identified an E-mail correspondence from 2022 from the Permittee that had not been responded to by the OCD. Therefore, OCD attaches its review responses to the permittee's correspondence and provides a list of the deliverables that OCD is seeking for its Administrative Record below. Any correspondence and submittals to the OCD related to this brine well and facility must be received via the E-Permitting System.

Based on the attached document, a review of the Administrative Record, and current audit of deliverables for BW-4, OCD identifies the following permit deliverables and/or responses that it is seeking below **by COB Friday on September 29, 2023.**

- 1) Sec. 2A.1 Monitor Well: failure to comply; **The MW has been installed- final report will be submitted in OCD Elect file by May 1, 2024.**
- 2) Sec. 2.B.1 Surface Subsidence Monitoring Plan: failure to comply; **Subsidence Monitors have been installed. Will report first baseline by May 1, 2024.**
- 3) Sec. 2.B.2 Solution Cavern Characterization Program Plan: failure to comply in 2022; **Wasserhund has complied and has been reporting in annual reports.**
- 4) Sec. 2.F Record Keeping: permit deliverable must be submitted via the E-Permitting System. **Understand, all future reports will be OCD Elect Permit file.**
 Little or no permit or sundry deliverables have been received via E-Permitting after December 19, **Wasserhund actually has submitted several by E-permit.**
 2019; **Wasserhund's file now 18 files in new system-see attached list. All annual reports are in system, which includes production data.**
- 5) Sec. 2.H.3.a Other Requirements: Environmental Monitoring and MW Installation: failure to comply; **See answer above. MW has been installed.**
- 6) Sec. 2.J Annual Report: failure to submit the 2022 report by June 1, 2023; **Health issues and death in family for consultant caused delay- report has been filed.**
- 7) Section 3.B Injection Operations: well injection pressures with production information must be submitted via E-Permitting from December 2019 to present; **Data in Annual Reports.**
- 8) Sec. 3.D(4) Mechanical Integrity: submittal of original test information was not submitted via E-Permitting using the OCD Form C-103Z Sundry. The OCD Inspector witnessed the test; therefore, OCD may allow for the non-discernible test information to be entered into the administrative record; **C-103-Z's are located in OCD elect files action Items 1129552 & 112963**
- 9) Sec. 3.F Fluids Injection and Brine Production Volumes and Pressures: failure to submit via E-Permitting since December 19, 2019; **Noted, except Annual Reports were E-permit.**
- 10) Sec. 3.G Area of Review: failure to submit in the 2022 Annual Report; **AOR was discussed in 2022 Annual report.**
- 11) Sec. 5.A Schedule, Annual Report: failure to comply; **All Annual Reports are in new OCD Elect e-permit files.**
- 12) Sec. 5.C Surface Subsidence Monitoring Plan: failure to comply; and **Has been addressed, see above monitors installed.**
- 13) Sec. 5.D Solution Cavern Characterization Plan: failure to comply in 2022; **Has been addressed, see Annual Reports.**

Please contact me if you have questions or to schedule a meeting to discuss the above message.

Thank you.

Carl J. Chavez • UIC Group
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 EMNRD - Oil Conservation Division
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 505.660.7923 | CarlJ.Chavez@emnrd.nm.gov
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**All Monthly Data
has been entered
in E-Permit system
for 2019-2022 March
24, and 2023 March
09, 2024.**



2019

Wasserhund Inc OCD BW-04 Annual Production Data & Comparision Chart

		Fresh IN		Brine Out		Ratio FW/BW			
Jan		29950		29757		101%			
Feb		27096		26981		100%			
Mar		14537		14422		101%			
Apr		10478		10450		100%			
May		6103		6075		100%			
Jun		3836		3826		100%			
Jul		3879		3840		101%			
Aug		5071		4996		102%			
Sept		2460		2446		101%			
Oct		8887		8799		101%			
Nov		8217		8192		100%			
Dec		8122		8079		101%			
Total		128,636		127,863		101%	FW/BW		
Total Fresh Water and Brine Production Carry Over from Years Past	2018	9,817,512	bbls***	9,766,847	bbls	100.52%	FW/BW		
Total Life Time Production Year Ending	2019	9,946,148	bbls	9,894,710	bbls	100.52%	FW/BW		
Injection pressures range from 260-280 psig normally. There is an Injection pressure cut-off at 350 psig.									

Wasserhund Inc		OGRID #	8426	API#-	30-025-26883	BW-04			
	Lat	N	32.8731						
	Lon	W	-103.5051						
	Legal	M-31-16s-35e							
	Footage	567 FSL		162 FWL					
	2020	Wasserhund Inc OCD BW-04 Annual Production Data & Comparision Chart							
			Fresh IN		Brine Out		Ratio FW/BW		
	Jan		7910		7875		100%		
	Feb		9630		9590		100%		
	Mar		12800		12696		101%		
	Apr		8085		8080		100%		
	May		500		555		90%		
	Jun		601		590		102%		
	Jul		111		110		101%		
	Aug		266		265		100%		
	Sept		2135		2130		100%		
	Oct		1395		1386		101%		
	Nov		2099		2079		101%		
	Dec		2096		2085		101%		
	Total		47,628		47,441		100%	FW/BW	
	Total Fresh Water and Brine Production Carry Over from Years Past	2019	9,946,148	bbls***	9,894,710	bbls	100.52%	FW/BW	
	Total Life Time Production Year Ending	2020	9,993,776	bbls	9,942,151	bbls	100.52%	FW/BW	
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	Wasserhund Inc		OGRID # 8426	API#- 30-025-26883		BW-04			
		Lat	N 32.8731						
		Lon	W -103.5051						
		Legal	M-31-16s-35e						
		Footage:	567 FSL	162 FWL					
	2021	Wasserhund Inc OCD BW-04 Annual Production Data & Comparision Chart							
			Fresh IN		Brine Out		Ratio FW/BW		
	Jan		11147		11092		100.50%		
	Feb		11215		11190		100.22%		
	Mar		7895		7875		100.25%		
	Apr		7230		7215		100.21%		
	May		7920		7917		100.04%		
	Jun		9125		9105		100.22%		
	Jul		6608		6578		100.46%		
	Aug		1202		1200		100.17%		
	Sept		4171		4162		100.22%		
	Oct		5067		5062		100.10%		
	Nov		1503		1499		100.27%		
	Dec		2311		2310		100.04%		
	Total		75,394		75,205		100.25%	FW/BW	
	Total Fresh Water and Brine Production Carry Over from Years Past	2020	9,993,776	bbls***	9,942,151	bbls	100.52%	FW/BW	
	Total Life Time Production Year Ending	2021	10,069,170	bbls	10,017,356	bbls	100.52%	FW/BW	

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There is an Injection pressure cut-off at 350 psig.**

	Wasserhund Inc		OGRID # 8426	API# - 30-025-26883		BW-04			
		Lat	N 32.8731						
		Lon	W -103.5051						
		Legal	M-31-16s-35e						
		Footage:	567 FSL	162 FWL					
	2022	Wasserhund Inc OCD BW-04 Annual Production Data & Comparison Chart							
							Permit condition 2B.2.b 90%-110%		
			Fresh IN		Brine Out		Ratio FW/BW		
	Jan		11175		11173		100.02%		
	Feb		9692		9690		100.02%		
	Mar		3266		3264		100.06%		
	Apr		0		0		#DIV/0!		
	May		6663		6286		106.00%		
	Jun		12701		12097		104.99%		
	Jul		13121		13119		100.02%		
	Aug		10350		10319		100.30%		
	Sept		16142		16139		100.02%		
	Oct		9878		9865		100.13%		
	Nov		17388		17364		100.14%		
	Dec		16752		16748		100.02%		
	Total		127,128		126,064		100.84%	FW/BW	
	Total Fresh Water and Brine Production Carry Over from Years Past	2021	10,069,170	bbls***	10,017,356	bbls	100.52%	FW/BW	
	Total Life Time Production Year Ending	2022	10,196,298	bbls	10,143,420	bbls	100.52%	FW/BW	

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District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 326192

CONDITIONS

Operator: WASSERHUND INC P.O. Box 2140 Lovington, NM 88260	OGRID: 130851
	Action Number: 326192
	Action Type: [UF-DP] Brine Facility Discharge Plan (DISCHARGE PLAN BRINE EXTRACTION)

CONDITIONS

Created By	Condition	Condition Date
cchavez	None	7/3/2024