

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

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.

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CONDITIONS

Action 323808

CONDITIONS

Operator: WASSERHUND INC P.O. Box 2140 Lovington, NM 88260	OGRID: 130851
	Action Number: 323808
	Action Type: [UF-DP] Brine Facility Discharge Plan (DISCHARGE PLAN BRINE EXTRACTION)

CONDITIONS

Created By	Condition	Condition Date
cchavez	Approved conditionally by clarification on the compliance update items: 6) Annual Report 2022 Cumulative Brine Production Figure is actually 10,143,420 bbls and not 10,143,120 bbls. 8) MIT reference to Action ID# 1129552 is actually 112955.	7/3/2024