



Wasserhund BW-04 OCD E-Permit files as of March 15 2024, By Price LLC

Action Id	Type	Status	Status Date
321886	[UF-DP] Brine Facility Discharge Plan 2023 Monthly/Quartely Production Numbers with comments	SUBMITTED	03/09/2024
295323	[UF-DP] Brine Facility Discharge Plan 2022 Annual Report-A	APPROVED	01/09/2024
263318	[UF-DP] Brine Facility Discharge Plan 2022 Annual Report	APPROVED	01/09/2024
287676	[UF-DP] Discharge Permit Subsidence and GW MW Plan	SUBMITTED	11/21/2023
280267	[UF-DP] Brine Facility Discharge Plan Subsidence Monitors Plan-Rejected for no Title.	REJECTED	10/27/2023
249990	[UF-DP] Brine Facility Discharge Plan Compliance Review	APPROVED	08/09/2023
182173	[UF-DP] NOI Brine Facility Discharge Plan OCD Notice for E-Permitting	APPROVED	02/02/2023
267818	[C-145] EP Change of Operator In File	APPROVED	09/07/2022
112843	[UF-DP] Brine Facility Discharge Plan 2021 Annual Report	APPROVED	07/08/2022
112963	[C-103] Sub. General Sundry C-103z Pressure Chart	APPROVED	06/08/2022
112955	[C-103] Sub. General Sundry C-103Z	APPROVED	06/08/2022
313691	[C-145] EP Change of Operator In File	DRAFT	04/12/2022
91375	[C-103] Sub. Workover Well File Info	APPROVED	03/28/2022
81295	[C-103] NOI Workover Well File Info	REJECTED	02/25/2022
81292	[C-103] NOI Workover Well file info	APPROVED	02/16/2022
29614	[UF-DP] Brine Facility Discharge Plan 2020 Annual Report	APPROVED	01/13/2022
20991	[UF-DP] Brine Facility Discharge Plan 2020 Annual Production Numbers with comparisons	APPROVED	03/18/2021
138088	[C-145] EP Change of Operator In File	APPROVED	10/13/2011

- [All Actions \(18\)](#)
- [Draft Actions \(1\)](#)
- [More Info Actions \(0\)](#)
- [Pending Actions \(2\)](#)
- [Approved Actions \(13\)](#)
- [Rejected Actions \(2\)](#)

Wasserhund/Price LLC Audit of OCD records in E-Permit Elect submission files. Dated March 15, 2024.

**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.

Carl J. Chavez • UIC Group
 Engineering Bureau
 EMNRD - Oil Conservation Division
 Horizon Building
 8801 Horizon Blvd., Suite 260 | Albuquerque, NM 87113
 505.660.7923 | CarlJ.Chavez@emnrd.nm.gov
www.emnrd.nm.gov



wayne price <waynepriceq.com@gmail.com>

Re: [EXTERNAL] BW-04 Wasserhund Audit of State Records by Price LLC

1 message

wayne price <waynepriceq.com@gmail.com>

Fri, Mar 15, 2024 at 3:13 PM

To: "Chavez, Carl, EMNRD" <Carl.Chavez@emnrd.nm.gov>

Cc: jonrgandy Gandy <JonRGandy@aol.com>, Email Service <waprice23@hotmail.com>, Jamie Dean <jmdean14@yahoo.com>, "Goetze, Phillip, EMNRD" <phillip.goetze@emnrd.nm.gov>

Dear Carl,

Thank you immissley for the detailed feedback. I do think there could be more discussion concerning the correspondence, but really the bottom line is that Wasserhund wants to comply with your request.

I have reviewed the E-permit files and down-loaded the BW-04 2023-2024 Compliance Review Email dated Aug 08, 2023 Action ID # 24990. I have marked our responses and progress in RED. See *attached*.

In addition, I noted the E-permit file has 18 submittals, a few of those were submitted by OCD, I.e. the above mentioned compliance review. I have attached a copy of the file ID action items and annotated for reference. See *attached*.

It appears that we have met, or in advanced progress of meeting your items of concern. All annual reports from 2020-2022 are in the system, the requested subsidence monitors have been installed, the groundwater monitor well has been completed, and we are working on providing you an "AS Built" records and baseline initial results.

Recently I indicated that we should have those results in approximately 45 days. They will be submitted by OCD elect E-permit system.

Summarizing:

It appears from our standpoint your concern now is primarily focused on having the production reports submitted electronically thru OCD E-permit. Attached is an E-mail instructing the Wasserhund Personnel to send all production reports to Price LLC which will file them correctly. See attached.

I have compiled the 2023 production reports and submitted them E-permit Action ID # 321886 dated March 09, 2024. As for all other reports, starting in 2020-2022, these were sent by US mail or E-mail. On February 2, 2023, you sent an Notice that OCD would like to have these submitted electronically. Unfortunately, they were sent via E-mail. We apologize for that misunderstanding.

Please note, all production data has actually been submitted for 2020-2022 thru E-permit system, they are contained in separate or annual reports; Year 2020 action ID# 20991 dated March 18, 2021 and ID# 29614 dated Jan 13, 2022; and Year 2021 action ID # 112843 dated July 08, 2022; and Year 2022 ID # Jan 09, 2024.

Variance Request:

We hereby request that all production reports be submitted quarterly rather than monthly. Wasserhund will ensure any anomalies and/or permit conditions i.e. 2.B.2.b. will be addressed in a timely fashion and OCD will be notified.

If there are any outstanding issues, please notify us via E-mail (waynepriceq.com@gmail.com).

Sincerely;

CC: Will file this document thru E-permit, with E-mail notification to you.

On Thu, Mar 14, 2024 at 2:03 PM Chavez, Carl, EMNRD <CarlJ.Chavez@emnrd.nm.gov> wrote:

Wayne, et al.,

Hi. Please see my responses to your e-mail msg. below in red text below.

Please contact me if you have any questions or would like to search the OCD Administrative Records for BW-4 together via telephone.

Thank you.

Carl J. Chavez • UIC Group

Engineering Bureau

EMNRD - Oil Conservation Division

Horizon Building

8801 Horizon Blvd., Suite 260 | Albuquerque, NM 87113

505.660.7923 | CarlJ.Chavez@emnrd.nm.gov

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From: wayne price <waynepriceq.com@gmail.com>

Sent: Thursday, March 14, 2024 12:20 PM

To: Chavez, Carl, EMNRD <CarlJ.Chavez@emnrd.nm.gov>; jonrgandy Gandy <JonRGandy@aol.com>; Email Service <waprice23@hotmail.com>; Jamie Dean <jmdean14@yahoo.com>

Subject: [EXTERNAL] BW-04 Wasserhund Audit of State Records by Price LLC

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Dear Carl,

Pursuant to your recent telephone conversations and compliance E-Mails, concerning filing Electronically, Price LLC took several hours to looked at both the old administrative records found in the old imagine system under Brine Well Permits (BW-04) and the new records found

in the current electronic system.

A little History: Sometime in 2019 or thereabouts, the OCD started the electronic filing of permits, certain forms and documents, but not all. I specifically remember that at that time there was no guidance on how to import Brine Well Documents. I remember you had inquired to the "IT" folks and sometime later you had worked it out somewhat. During that transition, which I remember was from approximately 2019- early 2021. What we did was to make sure you received a hard copy either by US mail or E-mail and you made an effort to help us get these filed. We greatly appreciate those efforts. **[Carl says:]** *December 19, 2019 was the date "E-Permitting" became active and WQCC submittals were submitted using the "UF-DP Brine Discharge Permit" Online Form for all submittals. There were initial problems in the process when submitters opted for "Other" instead of "New."*

During this transition, the Gandy Corp filed several production reports the old fashion way. After Jon Gandy became the principal for Wasserhund sometime in 2022, there was some sort of internal arrangement that Gandy (I.e. Donnie Collins) would keep sending in the production reports. *As I recall, OCD has not received any reports or correspondence via OCD E-Permitting with the exception of a few recent ones that you may have sent across the system.*

Then in Feb 2023 you had notified Job Gandy about making sure no further paper copies or E-mails will be accepted, and all documents must be submitted electronically. *OCD has a record of correspondences sent to Mr. Jon Gandy indicating there was a reporting problem since 2019.*

You primarily focused on production reports. Price LLC was not responsible during this transition period of filing production reports, however Price did file the annual reports that contained all required production data, including ratio and comparison numbers pursuant to the permit requirements. *The reason for the most recent compliance letter was the absence of reports, etc. in the OCD Admin. Record for BW-4 from 2019 to the date of the compliance letter. Then, within the past month a monthly report was again submitted via E-mail to the OCD outside of the E-Permitting System.*

The new Electronic filing records show where we filed the 2020, 2021 and 2022 annual reports electronically starting in Jan of 2022. I remember you assisted me on how to do this and all have been approved. *As I recall, all records before December 19, 2019 could be found in the admin. record via "OCD Imaging" and all post submittals could be found under the new OCD Online or E-Permitting: "Facility ID#" for BW-4 (fCJC2116630149). The most recent OCD Compliance Letter involved a combination of reviewing OCD Imaging and OCD Permitting searches.*

Bottom Line:

It appears that OCD has all of the production data currently in your old and new files, i.e. in the annual reports.

The most recent OCD Compliance Letter outlines what is currently missing from the OCD Admin. Records. OCD has requested that the missing documents in that letter be submitted via the OCD Online or E-Permitting System. An E-mail from you indicates that you were working to address the submittals per the OCD Compliance Letter.

Issue at Hand:

The current issue is concerning monthly production reports going forward, should be filed electronically. *Yes, OCD had requested monthly reports from 2019 to Present most recently because OCD was or is continuing to receive reports outside of the OCD Online or E-Permitting System.*

Recently I requested that Wasserhund be able to submit these quarterly. I understand this request is pending? *OCD is assessing the request that may need to be handled as a "Modification to the Discharge Permit" if approved. I am conferring with my Supervisor based on your recent E-mail requesting "Monthly Brine Production Reports" to be submitted quarterly. OCD is working to respond to this E-mail request.*

PS: I see no benefit in refileing old production reports since all of the information is contained in the Old and New files, i.e. annual reports. Please advise. *OCD is confused by this statement? The Permittee should review the most recent OCD compliance letter requesting information that is missing from the OCD Administrative Records for BW-4 and indicate where they are already present in the OCD Admin. Record. Currently, unless you have been submitting the information via E-Permitting, I'm not aware of any records that been submitted based on the OCD Letter.*

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3 attachments

 **Compliance up-date.pdf**
281K

 **BW-04 New Elect File.pdf**
652K

 Only E-Permit no paper or E-mail.pdf
259K

 Gmail

Search mail

Compose

Inbox 660

Starred

Snoozed

Sent

Drafts 6

All Mail

Spam

Trash

More

Labels +

4 of many <

Re: No More Paper or E-mail to OCD! >

 **wayne price** <waynepriceq.com@gmail.com>
to jonrgandy, Jamie, Carl., Email, Tasha

7:48AM (7 hours ago) ☆ 😊

Dear All,

OCD does not accept documents via paper or E-mail anymore. Please send all info to be reported to me and I will file.

On Fri, Mar 15, 2024 at 7:16 AM wayne price <waynepriceq.com@gmail.com> wrote:

Dear All,

Please note that OCD wants all reports submitted directly into the OCD electronic file system.

So please send these to me and I will file for Wasserhund, etc.

Thanks

--
Wayne Price-Price LLC
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Glenwood NM 88039
505-715-2809
waynepriceq.com@gmail.com

District I
 1625 N. French Dr., Hobbs, NM 88240
 Phone:(575) 393-6161 Fax:(575) 393-0720

District II
 811 S. First St., Artesia, NM 88210
 Phone:(575) 748-1283 Fax:(575) 748-9720

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

COMMENTS

Action 323802

COMMENTS

Operator: WASSERHUND INC P.O. Box 2140 Lovington, NM 88260	OGRID: 130851
	Action Number: 323802
	Action Type: [UF-DP] Brine Facility Discharge Plan (DISCHARGE PLAN BRINE EXTRACTION)

COMMENTS

Created By	Comment	Comment Date
cchavez	Compliance Correspondence Updating Administrative Record	10/23/2024

District I
 1625 N. French Dr., Hobbs, NM 88240
 Phone:(575) 393-6161 Fax:(575) 393-0720

District II
 811 S. First St., Artesia, NM 88210
 Phone:(575) 748-1283 Fax:(575) 748-9720

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

CONDITIONS

Action 323802

CONDITIONS

Operator: WASSERHUND INC P.O. Box 2140 Lovington, NM 88260	OGRID: 130851
	Action Number: 323802
	Action Type: [UF-DP] Brine Facility Discharge Plan (DISCHARGE PLAN BRINE EXTRACTION)

CONDITIONS

Created By	Condition	Condition Date
cchavez	Permittee submitting compliance correspondence related to updating BW-4 Admin. Record.	10/23/2024