

From: [Goetze, Phillip, EMNRD](#)
To: [Will Gifford](#)
Cc: [Rose-Coss, Dylan, EMNRD](#); [Gebremichael, Million, EMNRD](#); [Kuehling, Monica, EMNRD](#); [Schaefer, Alana, EMNRD](#); [Powell, Brandon, EMNRD](#)
Subject: RE: [EXTERNAL] San Isidro #7-11 SWD
Date: Wednesday, September 28, 2022 10:05:00 AM
Attachments: [Packer Setting Depth Exception Example.pdf](#)

RE: San Isidro 7 Well #11; API 30-043-20729; EPA Exempted Aquifer Determination/Injection Authority Division Order No. R-10847

Will:

My apologies for the delay in response due to the necessity to review the case file. The placement of the packer greater than 100 feet from the top perforation (or top of open hole) requires a written approval by the Director for inclusion in the UIC permit and well record (packer setting depth exception). Based on the well completion diagram submitted to the OCD on August 25, 2022, the top perforation in the Menefee Fm (permitted injection interval) is 2,438 ft. Using this information, the shallowest depth limit for packer setting within the 100-foot limit would be 2,338 ft. The final setting depth for a proper seal and successful MIT was reported at 2,339 ft which is below the limit, and therefore, no exception is required for the current packer setting depth. The placement of the packer above the 2,338 ft would require an exception. Also note that the seating of the packer above the upper contact of the Menefee (reported at 2,312 ft in the Turner Environmental exhibit for Case No. 11470) shall not be approved administratively and a new hearing shall be required for review of the injection authority and the exempt aquifer determination.

For future reference, the operator is required to submit a written request for the exception to the OCD through the Engineering e-mail. This document should provide details on why the new packer setting depth is required. OCD will review the request and will administratively modify the UIC permit with conditions. An example is provided. OCD is aware that a variety of well conditions (corroded casing surface, equipment downhole, etc.) can result in a packer not being seated within the 100-foot limit. However, the 100-foot limit is used to ensure proper monitoring of mechanical integrity while conforming to the requirement to maintain injection within the approved permit interval. Also note that the a new packer setting depth does not release the operator from the responsibility to maintain proper casing and cement integrity below the new depth including the necessity for corrective action if required.

A copy of this email will be placed in the well file for future reference. Please contact me if you have any additional questions on this process or the content of this email. PRG

From: Will Gifford <wgifford@pride-energy.com>
Sent: Wednesday, September 7, 2022 2:45 PM
To: Goetze, Phillip, EMNRD <Phillip.Goetze@state.nm.us>
Cc: Engineer, OCD, EMNRD <OCD.Engineer@state.nm.us>
Subject: [EXTERNAL] San Isidro #7-11 SWD

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

links or opening attachments.

Phillip,

As per our phone conversation, the San Isidro #7-11 SWD (API: 30-043-20729) packer has been set successfully at 2,339' and has had a successful MIT witnessed by a NMOCD rep. We would like to ask for a Packer Setting Depth Exception. Please let us know what information is needed to proceed.

Regards,

Will Gifford

Pride Energy Company

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CONDITIONS

Action 146877

CONDITIONS

Operator: PRIDE ENERGY COMPANY P.O. Box 701950 Tulsa, OK 741701950	OGRID: 151323
	Action Number: 146877
	Action Type: [IM-SD] Well File Support Doc (ENG) (IM-AWF)

CONDITIONS

Created By	Condition	Condition Date
pgoetze	None	9/28/2022