

## Goetze, Phillip, EMNRD

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**From:** Goetze, Phillip, EMNRD  
**Sent:** Monday, January 30, 2017 3:03 PM  
**To:** Brown, Maxey G, EMNRD; 'Chris Gaddy'  
**Subject:** RE: Grama Ridge Disposal LLC, Ojo Chiso Well #1 (API 30-025-24459)

Mr. Gaddy:

Unfortunately, what you have encountered is a "ghost of templates past". This sentence is commonly applied to SWD orders with approved injection intervals in the Delaware Mountain Group. There would be a corresponding Condition of Approval (COA) in the order prior to this underlined sentence – specifically, that a SRT was to be conducted and provide to the Division prior to commencing injection. This sentence would offer the operator the opportunity to utilize this same SRT for a pressure increase application above the admin gradient of 0.2 psi/ft.

Since this is a Devonian well, the Division's main concern would be ensuring that there is no hydrocarbon potential as well as no part of the open hole into Ordovician that can make communication with the Ellenberger.

So for this order, the step rate test is not a COA and would be conducted at the operator's discretion should injection performance be unsatisfactory. Our apology if this oversight has caused any inconvenience. Please contact me with any questions on this matter. PRG

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**From:** Brown, Maxey G, EMNRD  
**Sent:** Monday, January 30, 2017 2:23 PM  
**To:** Goetze, Phillip, EMNRD <[Phillip.Goetze@state.nm.us](mailto:Phillip.Goetze@state.nm.us)>  
**Subject:** FW: Grama Ridge Disposal LLC, Ojo Chiso Well #1 (API 30-025-24459)

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**From:** Chris Gaddy [<mailto:cgaddy@CambrianMgmt.com>]  
**Sent:** Monday, January 30, 2017 2:16 PM  
**To:** Brown, Maxey G, EMNRD <[MaxeyG.Brown@state.nm.us](mailto:MaxeyG.Brown@state.nm.us)>  
**Subject:** Grama Ridge Disposal LLC, Ojo Chiso Well #1 (API 30-025-24459)

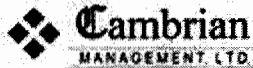
Maxey,

We are re-entering the subject well to make a SWD for Grama Ridge Disposal and wanted to know when the initial Step-Rate Test is required to be done per the paragraph below from Administrative Order SWD-1657.

**The wellhead injection pressure on the well shall be limited to no more than 2933 psi, but may be modified by the Division Director following the completion of the initial Step-Rate Test.**  
In addition, the disposal well or system shall be equipped with a pressure limiting device in workable condition which shall, at all times, limit surface tubing pressure to the maximum allowable pressure for this well.

Thank you,

Chris Gaddy  
Drilling Manager



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