Initial

Application

Part I

Received: <u>07/18/2019</u>

This application is placed in file for record. It MAY or MAY NOT have been reviewed to be determined Administratively Complete

ed by OCD: 7/18/2019 9:	57:00 AM					
				Revised March 23, 2017		
RECEIVED: 07/18/2019	REVIEWER:	TYPE: SWD	APP NO: pMAN	И1911940185		
	F	ABOVE THIS TABLE FOR OCD DIVISION USE O				
1		IL CONSERVATION α Engineering Bure s Drive, Santa Fe,	eau -	The state of the s		
	ADMINISTRATIV	E APPLICATION C	HECKLIST			
	T IS MANDATORY FOR ALL ADM REGULATIONS WHICH REQUIRE I			VISION RULES AND		
Applicant: AWR Disposal LLC	C		OGRID I	Number: 328805		
Vell Name: Prime Time SWI			API:			
Proposed: SWD, Devonian, Siluri	ian, Fusselman, Montoya		Pool Co	de: 97869		
1) TYPE OF APPLICATIO	IN	DICATED BELOW h apply for [A] bus Dedication		SWD-2196		
☐DHC [II] Injection –	ng - Storage - Measu	□PC □OLS crease - Enhancec	□OLM I Oil Recovery □PPR	FOR OCR ONLY		
B. ☐ Royalty, ove	JIRED TO: Check those ators or lease holders erriding royalty owners requires published no	s, revenue owners		FOR OCD ONLY Notice Complete Application Content		

G. For all of the above, proof of notification or publication is attached, and/or, H. No notice required

D. Notification and/or concurrent approval by SLO

E. Notification and/or concurrent approval by BLM

F. Surface owner

3) **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is accurate and complete to the best of my knowledge. I also understand that no action will be taken on this application until the required information and notifications are submitted to the Division.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

Complete

	June 26, 2019
Randall Hicks (agent)	Date
Print or Type Name	505 238 9515
Kandsell H	Phone Number
- January J. J	r@rthicksconsult.com
Signature	e-mail Address

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 Road, Aztec, NM 87410
Phone: (505) 334-6178 Fax: (505) 334-6170
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

Phone: (505) 476-3460 Fax: (505) 476-3462

¹API Number

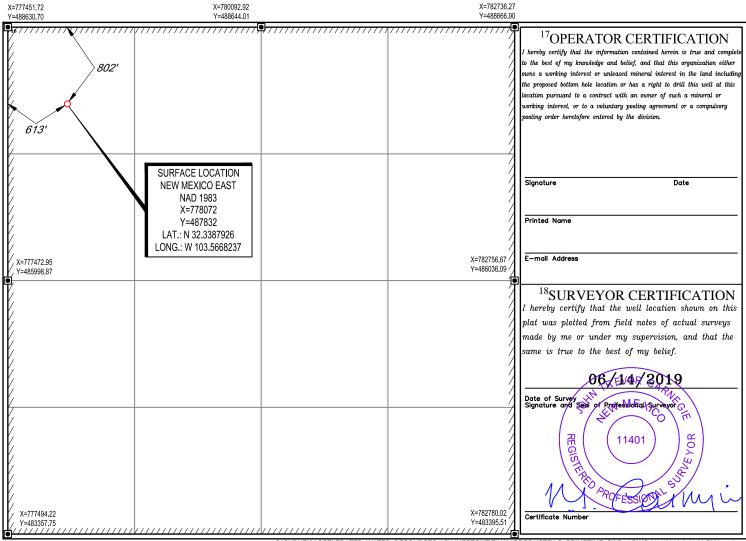
State of New Mexico
Energy, Minerals & Natural Resources
Department
OIL CONSERVATION DIVISION
1220 South St. Francis Dr.
Santa Fe, NM 87505

FORM C-102
Revised August 1, 2011
Submit one copy to appropriate
District Office

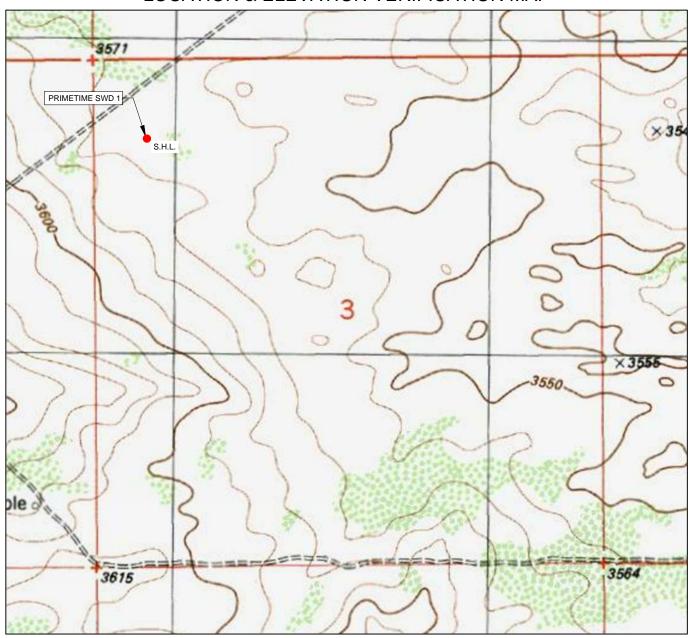
WELL LOCATION AND ACREAGE DEDICATION PLAT

⁴ Property Code				⁵ Property Name					⁶ Well Number				
	PRIME TIME SWD							1					
⁷ OGRID N	No. ⁸ Operator Name						⁹ Elevation						
32880)5	AWR DISPOSAL, LLC							3566'				
¹⁰ Surface Location													
UL or lot no.	Section	n Township Range Lot Idn Feet from the North/South line Feet from the East				st/West line	County						
D	3	23-	$\mathrm{S} \mid 33^{.}$	$-\mathbf{E}$	_	802	? '	NORTH	6	313'	WE	ST	LEA
¹¹ Bottom Hole Location If Different From Surface													
UL or lot no.	Section	ection Township Rang		Range Lot Idn		Feet f	rom the	North/South line		Feet from the East/		st/West line	County
¹² Dedicated Acres	¹³ Joint or 1	infill 1	⁴ Consolidati	ion Cod	le ¹⁵ Ord	ler No.							

No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.



LOCATION & ELEVATION VERIFICATION MAP



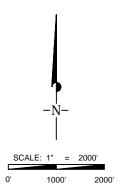
AWR DISPOSAL, LLC

 LEASE NAME & WELL NO.:
 PRIME TIME SWD #1

 SECTION __3 __TWP __23-S __RGE __33-E __COUNTY ___ LEA __STATE __NM __ELEVATION __3566'
 SURVEY __N.M.P.M. __

 DESCRIPTION _____ 802' FNL & 613' FWL
 ELEVATION __3566'

 LATITUDE ____ N 32.3387926 ____ LONGITUDE ____ W 103.5668237

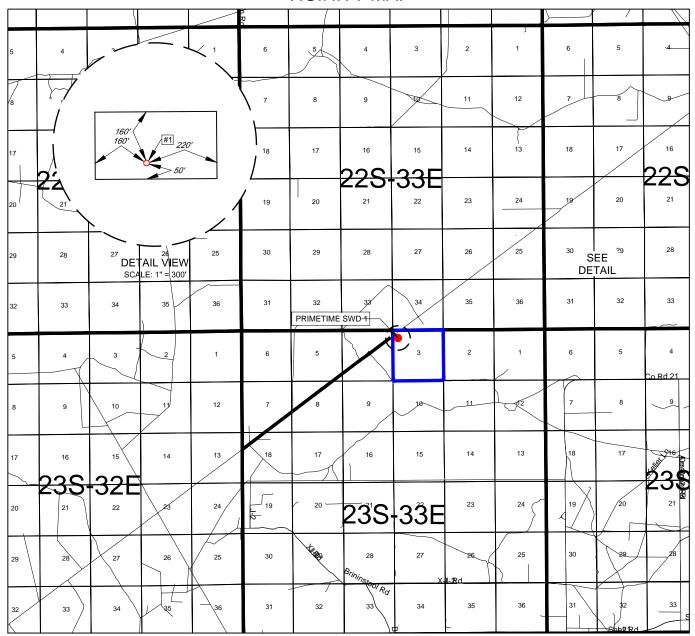


THIS EASEMENT/SERVITUDE LOCATION SHOWN HEREON HAS BEEN SURVEYED ON THE GROUND UNDER MY SUPERVISION AND PREPARED ACCORDING TO THE EVIDENCE FOUND AT THE TIME OF SURVEY, AND DATA PROVIDED BY AWR DISPOSAL, LLC. THIS CERTIFICATION IS MADE AND LIMITED TO THOSE PERSONS OR ENTITIES SHOWN ON THE FACE OF THIS PLAT AND IS NON-TRANSFERABLE. THIS SURVEY IS CERTIFIED FOR THIS TRANSACTION ONLY.

ALL BEARINGS, DISTANCES, AND COORDINATE VALUES CONTAINED HEREON ARE GRID BASED UPON THE NEW MEXICO COORDINATE SYSTEM, EAST ZONE OF THE NORTH AMERICAN DATUM 1983, U.S. SURVEY FEET.



EXHIBIT 2 VICINITY MAP



AWR DISPOSAL, LLC

 PRIME TIME SWD #1

 SECTION __3 TWP _23-S RGE _33-E SURVEY _N.M.P.M.

 COUNTY _____ LEA ____ STATE _____ NM

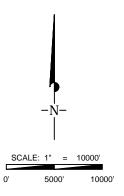
 DESCRIPTION _____ 802' FNL & 613' FWL

DISTANCE & DIRECTION

FROM INT. OF NM-128 & DELAWARE BASIN RD., GO NORTH ON DELAWARE BASIN RD. ±6.0 MILES, THENCE WEST (LEFT) ON LEASE RD. ±2.4 MILES, THENCE NORTH (RIGHT) ON LEASE RD. ±3.6 MILES, THENCE NORTHEAST (RIGHT) ON PADUCA BREAKS LN. ±3.2 MILES, TO A POINT ±750 FEET SOUTHEAST OF THE LOCATION.

THIS EASEMENT/SERVITUDE LOCATION SHOWN HEREON HAS BEEN SURVEYED ON THE GROUND UNDER MY SUPERVISION AND PREPARED ACCORDING TO THE EVIDENCE FOUND AT THE TIME OF SURVEY, AND DATA PROVIDED BY AWR DISPOSAL, LLC. THIS CERTIFICATION IS MADE AND LIMITED TO THOSE PERSONS OR ENTITIES SHOWN ON THE FACE OF THIS PLAT AND IS NON-TRANSFERABLE. THIS SURVEY IS CERTIFIED FOR THIS TRANSACTION ONLY.

ALL BEARINGS, DISTANCES, AND COORDINATE VALUES CONTAINED HEREON ARE GRID BASED UPON THE NEW MEXICO COORDINATE SYSTEM, EAST ZONE OF THE NORTH AMERICAN DATUM 1983, U.S. SURVEY FEET.





1400 EVERMAN PARKWAY, Ste. 146 • FT. WORTH, TEXAS 76140

TELEPHONE: (817) 744-7512 • FAX (817) 744-7554

2903 NORTH BIG SPRING • MIDLAND, TEXAS 79705

TELEPHONE: (432) 682-1653 OR (800) 767-1653 • FAX (432) 682-1743

WWW.TOPOGRAPHIC.COM

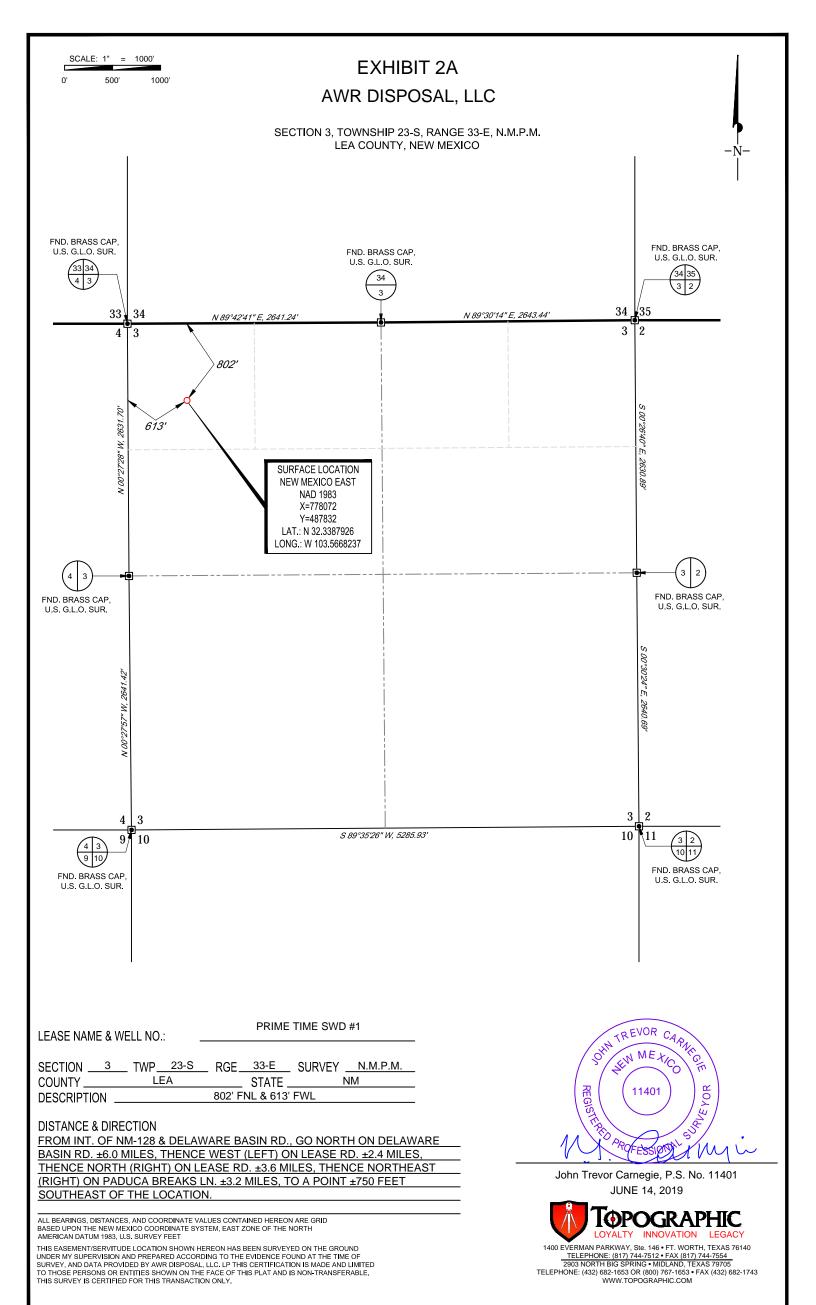
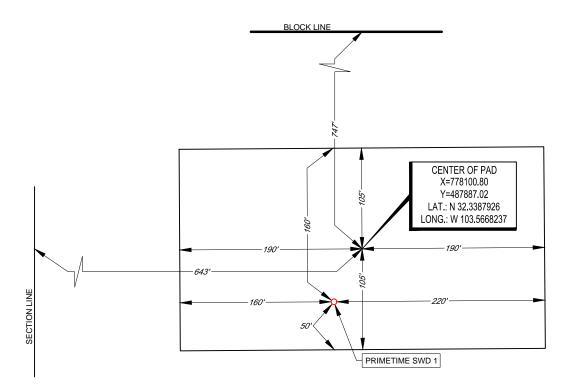
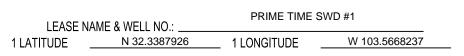


EXHIBIT 2B

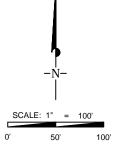
AWR DISPOSAL, LLC

SECTION 3, TOWNSHIP 23-S, RANGE 33-E, N.M.P.M. LEA COUNTY, NEW MEXICO





CENTER OF PAD IS 747' FNL & 643' FWL



ALL BEARINGS, DISTANCES, AND COORDINATE VALUES CONTAINED HEREON ARE GRID BASED UPON THE NEW MEXICO COORDINATE SYSTEM, EAST ZONE OF THE NORTH AMERICAN DATUM 1983, U.S. SURVEY FEET

THIS PROPOSED PAD SITE LOCATION SHOWN HEREON HAS BEEN SURVEYED ON THE GROUND UNDER MY SUPERVISION AND PREPARED ACCORDING TO THE EVIDENCE FOUND AT THE TIME OF SURVEY, AND DATA PROVIDED BY AWR DISPOSAL, LLC, THIS CERTIFICATION IS MADE AND LIMITED TO THOSE PERSONS OR ENTITIES SHOWN ON THE FACE OF THIS PLAT AND IS NON-TRANSFERABLE. THIS SURVEY IS CERTIFIED FOR THIS TRANSACTION ONLY.



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TELEPHONE: (817) 744-7512 • FAX (817) 744-7554

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WWW.TOPOGRAPHIC.COM

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, New Mexico 87505

FORM C-108 Revised June 10, 2003

APPLICATION FOR AUTHORIZATION TO INJECT

I.	PURPOSE: Secondary Recovery Pressure Maintenance X Disposal Storage Application qualifies for administrative approval? Yes No						
II.	OPERATOR: _AWR Disposal, LLC						
	ADDRESS:3300 N. A Street, Ste 220, Midland, TX 79705						
	CONTACT PARTY:Randall Hicks (Agent)PHONE:505 238 9515						
III.	WELL DATA: Complete the data required on the reverse side of this form for each well proposed for injection. Additional sheets may be attached if necessary.						
IV.	Is this an expansion of an existing project?YesXNo If yes, give the Division order number authorizing the project:						
V.	Attach a map that identifies all wells and leases within two miles of any proposed injection well with a one-half mile radius circle drawn around each proposed injection well. This circle identifies the well's area of review.						
VI.	Attach a tabulation of data on all wells of public record within the area of review which penetrate the proposed injection zone. Such data shall include a description of each well's type, construction, date drilled, location, depth, record of completion, and a schematic of any plugged well illustrating all plugging detail.						
VII.	Attach data on the proposed operation, including:						
	 Proposed average and maximum daily rate and volume of fluids to be injected; Whether the system is open or closed; Proposed average and maximum injection pressure; Sources and an appropriate analysis of injection fluid and compatibility with the receiving formation if other than reinjected produced water; and, If injection is for disposal purposes into a zone not productive of oil or gas at or within one mile of the proposed well, attach a chemical analysis of the disposal zone formation water (may be measured or inferred from existing literature, studies, nearby wells, etc.). 						
*VIII.	Attach appropriate geologic data on the injection zone including appropriate lithologic detail, geologic name, thickness, and depth Give the geologic name, and depth to bottom of all underground sources of drinking water (aquifers containing waters with total dissolved solids concentrations of 10,000 mg/l or less) overlying the proposed injection zone as well as any such sources known to be immediately underlying the injection interval.						
IX.	Describe the proposed stimulation program, if any.						
*X.	Attach appropriate logging and test data on the well. (If well logs have been filed with the Division, they need not be resubmitted)						
*XI.	Attach a chemical analysis of fresh water from two or more fresh water wells (if available and producing) within one mile of any injection or disposal well showing location of wells and dates samples were taken.						
XII.	Applicants for disposal wells must make an affirmative statement that they have examined available geologic and engineering data and find no evidence of open faults or any other hydrologic connection between the disposal zone and any underground sources of drinking water.						
XIII.	Applicants must complete the "Proof of Notice" section on the reverse side of this form.						
XIV.	Certification: I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.						
	NAME: Randall Hicks TITLE: _Agent						
	SIGNATURE:DATE:DATE:D6/26/2019						
*	E-MAIL ADDRESS:R@rthicksconsult.com						

III. WELL DATA

- A. The following well data must be submitted for each injection well covered by this application. The data must be both in tabular and schematic form and shall include:
 - (1) Lease name; Well No.; Location by Section, Township and Range; and footage location within the section.
 - (2) Each casing string used with its size, setting depth, sacks of cement used, hole size, top of cement, and how such top was determined.
 - (3) A description of the tubing to be used including its size, lining material, and setting depth.
 - (4) The name, model, and setting depth of the packer used or a description of any other seal system or assembly used.

Division District Offices have supplies of Well Data Sheets which may be used or which may be used as models for this purpose. Applicants for several identical wells may submit a "typical data sheet" rather than submitting the data for each well.

- B. The following must be submitted for each injection well covered by this application. All items must be addressed for the initial well. Responses for additional wells need be shown only when different. Information shown on schematics need not be repeated.
 - (1) The name of the injection formation and, if applicable, the field or pool name.
 - (2) The injection interval and whether it is perforated or open-hole.
 - (3) State if the well was drilled for injection or, if not, the original purpose of the well.
 - (4) Give the depths of any other perforated intervals and detail on the sacks of cement or bridge plugs used to seal off such perforations.
 - (5) Give the depth to and the name of the next higher and next lower oil or gas zone in the area of the well, if any.

XIV. PROOF OF NOTICE

All applicants must furnish proof that a copy of the application has been furnished, by certified or registered mail, to the owner of the surface of the land on which the well is to be located and to each leasehold operator within one-half mile of the well location.

Where an application is subject to administrative approval, a proof of publication must be submitted. Such proof shall consist of a copy of the legal advertisement which was published in the county in which the well is located. The contents of such advertisement must include:

- (1) The name, address, phone number, and contact party for the applicant;
- (2) The intended purpose of the injection well; with the exact location of single wells or the Section, Township, and Range location of multiple wells;
- (3) The formation name and depth with expected maximum injection rates and pressures; and,
- (4) A notation that interested parties must file objections or requests for hearing with the Oil Conservation Division, 1220 South St. Francis Dr., Santa Fe, New Mexico 87505, within 15 days.

NO ACTION WILL BE TAKEN ON THE APPLICATION UNTIL PROPER PROOF OF NOTICE HAS BEEN SUBMITTED.

NOTICE: Surface owners or offset operators must file any objections or requests for hearing of administrative applications within 15 days from the date this application was mailed to them.

INJECTION WELL DATA SHEET

OPERATOR:AWR I	Disposal LLC						
WELL NAME & NUM	BER: _Prime Time SWD #1						
WELL LOCATION:	802 FNL 613 FWL FOOTAGE LOCATION	D UNIT LETTER	3 SECTION	23S_ TOWNSHIP	33E_ RANGE		
<u>WELLBORE SCHEMATIC</u>		WELL CONSTRUCTION DATA Surface Casing					
		Hole Size:See A	Attachments	Casing Size:			
		Cemented with:	SX.	or	ft		
		Top of Cement:		Method Determine	ed:		
			<u>Intermedia</u>	ate Casing			
		Hole Size:		Casing Size:			
		Cemented with:	SX.	or	ft		
		Top of Cement:		Method Determine	ed:		
			<u>Productio</u>	n Casing			
		Hole Size:		Casing Size:			
		Cemented with:	SX.	or	ft		
		Top of Cement:		Method Determine	ed:		
		Total Depth:					
			Injection	Interval			
			fee	et to			

(Perforated or Open Hole; indicate which)

INJECTION WELL DATA SHEET

Tub	ping Size:See AttachmentsLining Material:
Тур	oe of Packer:
Pac	ker Setting Depth:
Oth	ner Type of Tubing/Casing Seal (if applicable):
	Additional Data
1.	Is this a new well drilled for injection?XYesNo
	If no, for what purpose was the well originally drilled?
2.	Name of the Injection Formation:Proposed: SWD, Devonian, Silurian, Fusselman, Montoya
3.	Name of Field or Pool (if applicable):
4.	Has the well ever been perforated in any other zone(s)? List all such perforated intervals and give plugging detail, i.e. sacks of cement or plug(s) usedNo
5.	Give the name and depths of any oil or gas zones underlying or overlying the proposed injection zone in this area: _See Attachments_

Attachments to C-108

Copy of well bore diagram

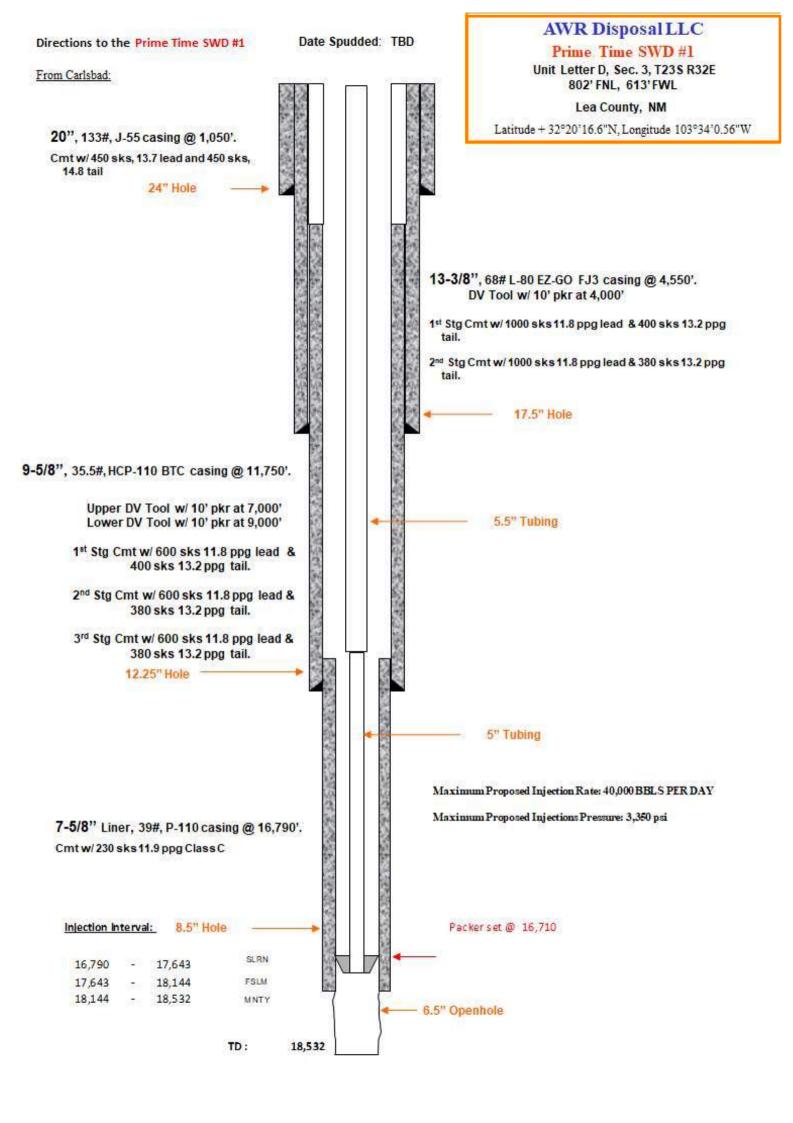
Section III-XII Written descriptions to supplement C-108

Plates referenced in written descriptions

Tables referenced in written descriptions

OSE well logs referenced in written descriptions

Section XIII Proof of Notice



III. WELL DATA

- A. The following well data must be submitted for each injection well covered by this application. The data must be both in tabular and schematic form and shall include
- 1. Lease name; Well No.; Location by Section, Township and Range; and footage location within the section

Lease Name: Prime Time SWD #1 Unit Letter D, Section 3, T23S R33E, 802 FNL, 613 FWL

2. Each casing string used with its size, setting depth, sacks of cement used, hole size, top of cement, and how such top was determined

The attached Wellbore Data Sheet provides all of the design specifics required and a tabulation of these data are shown on the diagram.

The formation tops for the Prime Time SWD #1 were established by Geologist Herb Wacker TBPG license #4517. The tops were picked by using the offset open hole logs of the surrounding wells. The Woodford formation top and deeper formations were correlated with open hole logs and picked using the three nearest wells drilled below the Simpson formation.

3. A description of the tubing to be used including its size, lining material, and setting depth

5-1/2" (20#) internal plastic coated tubing swaged down to 5" (18#) with setting depth of 16,986'.

4. The name, model, and setting depth of the packer used or a description of any other seal system or assembly used

An injection Packer will be set at 16,710'.

Prime Time, Section 3 OF 123S R33E				
Formation	GL	3575 est		
Tops	KB	3439		
		SS		
Quaternary	39	3566		
Dockum	125	3480		
Chinle	131	3474		
Santa Rosa	395	3210		
Dewey Lake	844	2761		
Rustler	1259	2346		
Castile	3640	-35		
Delaware	5223	-1618		
Lamar	5228	-1623		
Bell Canyon	5291	-1686		
Cherry Canyon	6184	-2579		
Brushy Canyon	7508	-3903		
Bone Spring	9121	-5516		
1st BS Sand	10268	-6663		
2nd BS Sand	10793	-7188		
3rd BS Sand	12010	-8405		
Wolfcamp	12321	-8716		
Strawn	13821	-10216		
Atoka	14067	-10462		
Morrow	14771	-11166		
Middle Morrow	15160	-11555		
Miss LS	16353	-12748		
Woodford	16625	-13020		
Silurian	16762	-13157		
Fusselman	17643	-14038		
Montoya	18144	-14539		
Simpson	18562	-14957		

Prime Time Section 3 OF T239 P33E

 Injection Interval
 16790
 Siluro-Devonian + 30'

 18532
 Simpson - 30'

 TD
 18532
 Simpson - 30'

- B. The following must be submitted for each injection well covered by this application. All items must be addressed for the initial well. Responses for additional wells need be shown only when different. Information shown on schematics need not be repeated.
 - (1) The name of the injection formation and, if applicable, the field or pool name

The proposed injection intervals include the Devonian, Silurian, Fusselman, and Montoya Formations in an open-hole interval.

(2) The injection interval and whether it is perforated or open-hole.

The depth interval of the open-hole injection interval is 16,790-18,532 (1,742 feet).

(3) State if the well was drilled for injection or, if not, the original purpose of the well.

The well will be drilled for disposal.

(4) Give the depths of any other perforated intervals and detail on the sacks of cement or bridge plugs used to seal off such perforations

There are no perforated intervals, only the open-hole completion described above.

(5) Give the depth to and the name of the next higher and next lower oil or gas zone in the area of the well, if any.

Tops for the Prime Time SWD #1 well were picked in part by using the offset open hole logs on the surrounding wells. The Woodford formation top and deeper formations were correlated with open hole logs and picked using the formation thicknesses of the three nearest wells drilled below the Simpson formation.

Overlying Oil & Gas Zone (Using GL of 3575'):

Delaware (5223')
1st BS Sand (10,268')
2nd BS Sand (10,793')
3rd BS Sand (12.010')
Wolfcamp (12,321')
Strawn (13,821')
Atoka (14,067')
Morrow (14,771')
Mississippian Limestone (16,353')

Underlying Oil & Gas Zones:

Devonian/Silurian (16,762')

1.Active 3.7 miles due east 30-025-33077 CUM: 1,560 BO x 1.25 BCF x 2.2 MBW)

2.Inactive 3.5 miles ESE 30-025-08483 CUM: 32 BCF x 6.6 MMBW

Ellenburger (19,120')

3.Inactive 3.7 miles due east 30-025-33077 CUM: 3.3 BCF x 255MBW

The proposed injection intervals in the Pre-Mississippian Carbonates are well cemented and will provide the necessary open hole integrity while allowing salt water to be injected. Because of the competency of the rock, the open hole section has very little chance of collapsing.

IV. Is this an expansion of an existing project No.

V. Attach a map that identifies all wells and leases within two miles of any proposed injection well with a one-half mile radius circle drawn around each proposed injection well. This circle identifies the well's area of review

Plate 1a identifies all OCD listed wells and API numbers and shows circles with radii of 0.5, 1.0, and 2.0 miles. Note that where numerous wells are closely-spaced, the API number may not be labeled for clarity. New wells, active wells, plugged wells, and canceled wells have color-coded symbols. Plate 1b shows only new and active wells and circles with radii of 0.5 and 1.0 miles.

Table 1 lists all of the wells shown on Plate 1a within the circle having a 2.0 mile radius.

Plate 2a shows BLM and SLO oil and gas leases and leaseholder names within the 2-mile area of review. Grey lines indicate lease boundaries within the sections. Private land ownership is also shown by line shading. Plate 2b shows surface land ownership as State, BLM, or Private. Tabular listing of all mapped leases and ownership is presented as:

Table 2a BLM leases

Table 2b State of NM leases
Table 2c Surface Owners

The Prime Time SWD #1 location is on land owned by the State of New Mexico (Table 2c).

VI. Attach a tabulation of data on all wells of public record within the area of review which penetrate the proposed injection zone. Such data shall include a description of each well's type, construction, date drilled, location, depth, record of completion, and a schematic of any plugged well illustrating all plugging detail

According to the data presented in Table 1, there are no active or plugged wells within the area of review that penetrates the proposed injection zone.

VII. Attach data on the proposed operation, including:

1. Proposed average and maximum daily rate and volume of fluids to be injected

Proposed Maximum Injection Rate: 40,000 bbl/day Proposed Average Injection Rate: 30,000 bbl/day

2. Whether the system is open or closed

This is will be an open system. All AWR Disposal LLC SWDs may receive produced water and recycled produced water from storage facilities, such as in-ground containments or above-ground steel-walled containments, which are registered or permitted under Rule 34.

3. Proposed average and maximum injection pressure

Proposed Maximum Injection Pressure: 3,350 psi Proposed Average Injection Rate: 2,550 psi

4. Sources and an appropriate analysis of injection fluid and compatibility with the receiving formation if other than reinjected produced water

The attached Table 3 "Produced Water Chemistry of Nearby Wells" provides the requisite analyses. The Delaware and Bone Springs Formations are the subjects of the analyses. These formations will provide most of the produced water to the proposed SWD. At the time of writing, we are unaware of any problems associated with disposal of produced water derived from the Delaware, Avalon, and Bone Springs Formations into the Devonian/Fusselman/Montoya injection zone.

5. If injection is for disposal purposes into a zone not productive of oil or gas at or within one mile of the proposed well, attach a chemical analysis of the disposal zone formation water (may be measured or inferred from existing literature, studies, nearby wells, etc.).

Table 4 presents formational water quality data from the Go-Tech site for Devonian-Fussleman-Montoya producing wells. As stated above, we are unaware of any problems associated with disposal of produced water derived from the Delaware, Avalon, and Bone Springs Formations into the Devonian/Fusselman/Montoya injection zone.

*VIII. Attach appropriate geologic data on the injection zone including appropriate lithologic detail, geologic name, thickness, and depth.

The proposed injection intervals include the Devonian, Silurian, Fusselman and Montoya Formations in an open-hole interval. The proposed injection intervals in the Pre-Mississippian Carbonates are well cemented and will provide the necessary open hole integrity while allowing salt water to be injected. Because of the competency of the rock, the open hole section has very little chance of collapsing.

As indicated in Section III.A.2, the approximate depths to the top of the Silurian and the base of the Montoya are 16,762 and 18,562 respectively. The depth interval of the injection interval is 17,066-18,400 (1,334 feet), within the Silurian, Fusselman, and Montoya Formations.

Give the geologic name, and depth to bottom of all underground sources of drinking water (aquifers containing waters with total dissolved solids concentrations of 10,000 mg/l or less) overlying the proposed injection zone as well as any such sources known to be immediately underlying the injection interval.

The Chinle Formation yields water to supply wells in this area of Lea County. In the immediate area of the Prime Time SWD #1, the closest mapped water wells are shown in Plate 3b as C-3582 and Misc 379. According to the driller's log, C-3582 was drilled in 2012 to a depth of 590 feet and penetrated a 52-foot thick water-bearing sand at a depth of 310-362 feet, which is probably the Santa Rosa Sandstone of the Chinle. The driller's log also suggests that water-bearing zones were encountered at various depths from about 50 feet to total depth. Evaluation of this location on Google Earth suggests this well supplies fresh water for oil and gas operations. Misc-379 is associated with a corral, about 2.75 miles southeast of the Prime Time SWD #1 site (Plate 3a). There is no data for this well. About 3 miles southwest of the proposed SWD is Misc-99, which shows a measured depth to water of 208 feet by Hicks Consultants in 2013. Hicks Consultants logged the conductor pipe borings Misc ## and Misc ##, at Devon Energy North Thistle wells, which are also in Section 3, T23S R33E. We found no evidence of saturated condition to a depth of 80 feet in these two auger borings. These data, which we know to be reliable, are in contrast to a driller's log of a water well drilled with mud that recorded wet conditions at 65 feet.

According to driller's logs in the OSE database (that we believe are reliable), in this area of Lea County, the Chinle yields water to wells from about 200-700-feet below the ground surface (bgs). The upper portion of the Rustler Formation yields fresh water to wells in Eddy County and in the area of the Prime Time SWD #1, the depth interval of this potential source of fresh (<10,000 mg/L TDS) water is about 1200 feet. Geophysical logs of oil wells in the area suggest that about 300 feet of the Dewey Lake (aka Quartermaster Formation) overlie the Rustler on the Limestone Ranch. At the time of writing, neither the Dewey Lake nor the Rustler are used as a fresh water supply and, to our knowledge, have not been tested as a fresh water (<10,000 mg/L TDS) unit.

As stated above, there are no active water supply wells within 1.5 miles of the proposed location. The location of nearby mapped surface water bodies are shown in Plate 4. No mapped surface water exists within the Area of Review.

In the area of the Prime Time SWD #1, the depth interval of the Rustler is about 1200-1500 feet bgs, according to the BLM and OCD and, we agree with this assessment. The bottom of the Rustler Formation is characterized by evaporates (anhydrite) and is not considered an underground source of drinking water. Thus, in this area, surface casing required by OCD to prevent impairment of fresh water runs from ground surface to a depth of 1032 feet at the proposed Prime Time SWD #1.

Fresh water does not exist in any formations below the proposed injection zone.

IX. Describe the proposed stimulation program, if any

A cleanup acid job may be used to remove mud and drill cuttings from the formation. However, no other formation stimulation is currently planned.

*X. Attach appropriate logging and test data on the well. (If well logs have been filed with the Division, they need not be resubmitted)

Logs will be submitted to OCD upon completion of the well.

*XI. Attach a chemical analysis of fresh water from two or more fresh water wells (if available and producing) within one mile of any injection or disposal well showing location of wells and dates samples were taken

No active water supply wells were identified within one mile of the proposed SWD. Data from various sources permit a conclusion that groundwater within the Chinle Formation is potable. In this area, groundwater in the underlying Rustler formation may be relatively brackish.

XII. Applicants for disposal wells must make an affirmative statement that they have examined available geologic and engineering data and find no evidence of open faults or any other hydrologic connection between the disposal zone and any underground sources of drinking water

Randall T. Hicks, a Professional Geologist with decades of experience in hydrogeology, affirms, on behalf of AWR Disposal LLC, that

• The USGS has mapped quaternary faults in New Mexico and no such faults are mapped in the area of the proposed Prime Time SWD #1¹

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¹ https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf

- The Texas Bureau of Economic Geology has mapped older faults (e.g. basement and Woodford) in New Mexico and the closest mapped fault is 2.7 miles to the east²
- With respect to migration of produced water from the injection zone to underground sources of drinking water via faults or other natural conduits, the following conditions were considered
 - The lowest underground source of drinking water is the middle and upper Rustler Formation.
 - More than 14,000 feet of sedimentary rock separates the bottom of the Rustler Formation and the top of the injection zone. Many of the formations that lie between the injection zone and the lowermost aquifer are permeable and contain oil, gas or water at various pressures. Any excursion of injected fluids from the Devonian disposal zone would undoubtedly enter these permeable formations prior to moving through the 2800-foot low-permeability salt zone that underlies the Rustler Formation.
 - There is no evidence that the pressure regime in the oil and gas reservoirs is sufficient to cause the upward migration of formation water through the bedded salt and into the Rustler or Chinle aquifers.
- There is no evidence of open faults or any other hydrologic connection between the disposal zone and any underground sources of drinking water

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² Bureau of Economic Geology (Accessed April 2019). University of Texas at Austin. Basement Faults (Ewing 1990, Tectonic Map of Texas); Precambrian Faults (Frenzel et al. 1988, Figure 6); Woodord Faults (Comer 1991, plate 1). Http://www.beg.utexas.edu/resprog/permianbasin/gis.htm

Plates

Plate 1	OCD wells within the area of review
Plate 2	Mineral leases within the area of review
Plate 3	Water supply wells within the area of review
Plate 4	Surface water within the area of review

