

# Additional Information

Date: 06/23/2020

## Rose-Coss, Dylan H, EMNRD

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**From:** Sarah Chapman <schapman@spurepllc.com>  
**Sent:** Tuesday, June 23, 2020 1:23 PM  
**To:** Rose-Coss, Dylan H, EMNRD  
**Cc:** Michael Sliva  
**Subject:** [EXT] Morris Arco 26 #2 SWD Additional Information  
**Attachments:** Morris Arco 26 #2\_Affidavit.pdf; Morris Arco 26 #2\_C-141.pdf; Morris Arco 26 #2\_C-141Payment.pdf; Morris Arco 26 #2\_ConfiningZones.pdf; Morris Arco 26 #2\_CrossSection.pdf; Morris Arco 26 #2\_RiskAssessment.pdf; Morris Arco 26 #2\_SEPUpdatedWBD.pdf

Good afternoon Dylan,  
We have completed all the information requested by you from our March 2020 meeting.

Attached you should find everything you need.  
If you have any additional questions or concerns, please do not hesitate to reach out.

Thank you for your help.

Sarah Chapman  
Regulatory Director  
**SPUR ENERGY PARTNERS LLC**  
920 Memorial City Way, Suite 1000 | Houston, TX 77024  
Cell: (281) 642-5503  
Direct: (832) 930-8613  
Office: (832) 930-8502  
schapman@spurepllc.com



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# Carlsbad Current Argus.

PART OF THE USA TODAY NETWORK

## Affidavit of Publication

Ad # 0004111973

This is not an invoice

**SPUR ENERGY PARTNERS LLC**  
920 MEMORIAL CITY WAY, SUITE 1000


**HOUSTON, TX 77024**

I, a legal clerk of the **Carlsbad Current Argus**, a newspaper published daily at the City of Carlsbad, in said county of Eddy, state of New Mexico and of general paid circulation in said county; that the same is a duly qualified newspaper under the laws of the State wherein legal notices and advertisements may be published; that the printed notice attached hereto was published in the regular and entire edition of said newspaper and not in supplement thereof on the date as follows, to wit:

03/14/2020

  
Legal Clerk

Subscribed and sworn before me this March 14, 2020:

  
State of WI, County of Brown  
NOTARY PUBLIC  
4-19-21  
My commission expires

### NOTICE OF APPLICATION FOR WATER DISPOSAL:

Spur Energy Partners LLC is filing a C-108 (Application for Authority to Inject) with the New Mexico Oil Conservation District seeking administrative approval to amend the Morris Arco 26 No. 2 salt water disposal well; located 990' FNL and 1650' FEL, Section 26, Township 19S, Range 25E, Eddy County, New Mexico; approximately 14.4 miles south of Artesia, New Mexico. Produced water will be privately disposed into the Cisco and Canyon formations in the SWD; Canyon Pool (96184) at a depth from 7796 feet to 8190 feet at a maximum surface pressure of 1556psi with a rate limited by such pressure.

Any questions concerning this application should be directed to Sarah Chapman, Regulatory Director, Spur Energy Partners LLC, 920 Memorial City Way, Suite 1000, Houston, TX 77024. Interested parties must file objections or requests for hearing with the Oil Conservation Division, 1220 S. St. Francis Dr., Santa Fe, NM 87505 within 15 days.  
#4111973, Current Argus, March 14, 2020

Ad # 0004111973  
PO #: NOA:WATER DISPOSAL  
# of Affidavits 1

This is not an invoice





## Morris Arco 26 #002 SWD

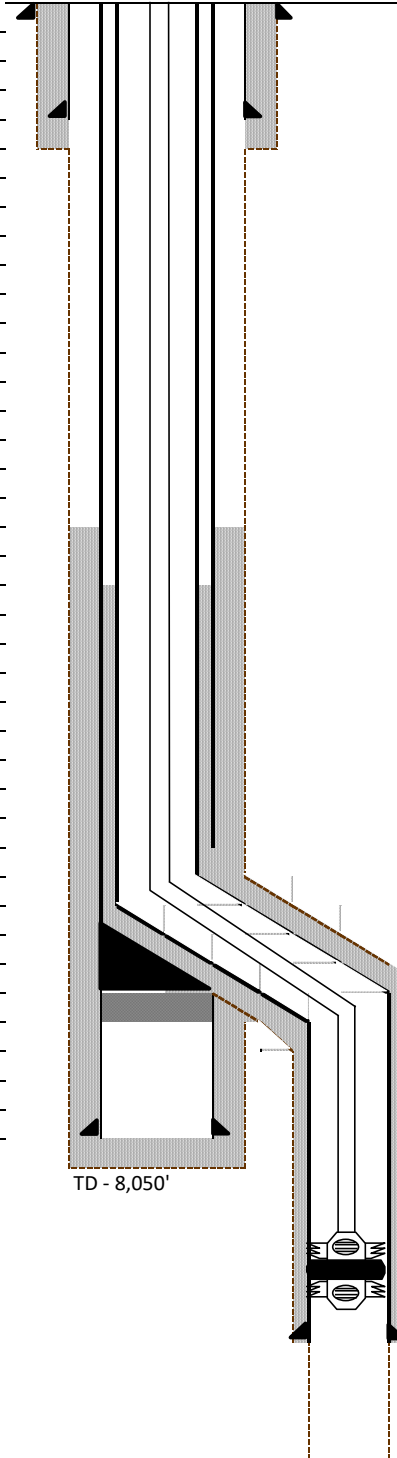
- ☒ Current Completion  
☐ Planned Completion

Last Edited 6/23/2020  
By: Michael L. Sliva

API #: 30-015-29258  
Field:  
Co, St: Eddy, NM  
Spud Date: 11/19/1996  
KB - MGL: 12

### Wellbore Data

16" Conductor @ 90'  
12-1/4" - OH  
9-5/8" 36# J-55 LTC @ 1,100'  
8-3/4" - OH  
TOC @ 5,631' Per Temp Log  
Cmt W/1,400sx  
Whipstock @ 7,768' Oriented 158.8°  
CIBP @ 7,780'  
7" 23/26# N-80/K-55 LTC  
6.276" - ID @ 8,025'  
6.151" - Drift



### Completion Data

Cmt W/700 sx to srf  
TOC @ 6550' Per Temp log  
Cmt W/150sx  
Mill Window 7,759' - 7,768'  
Packer @ 10,224'  
6-1/8" - OH  
5-1/2" 17# N-80 DTS4 @ 10,250'  
4 - 3/4" - OH  
Open hole 10250'-10559'



## Morris Arco 26 #002 SWD

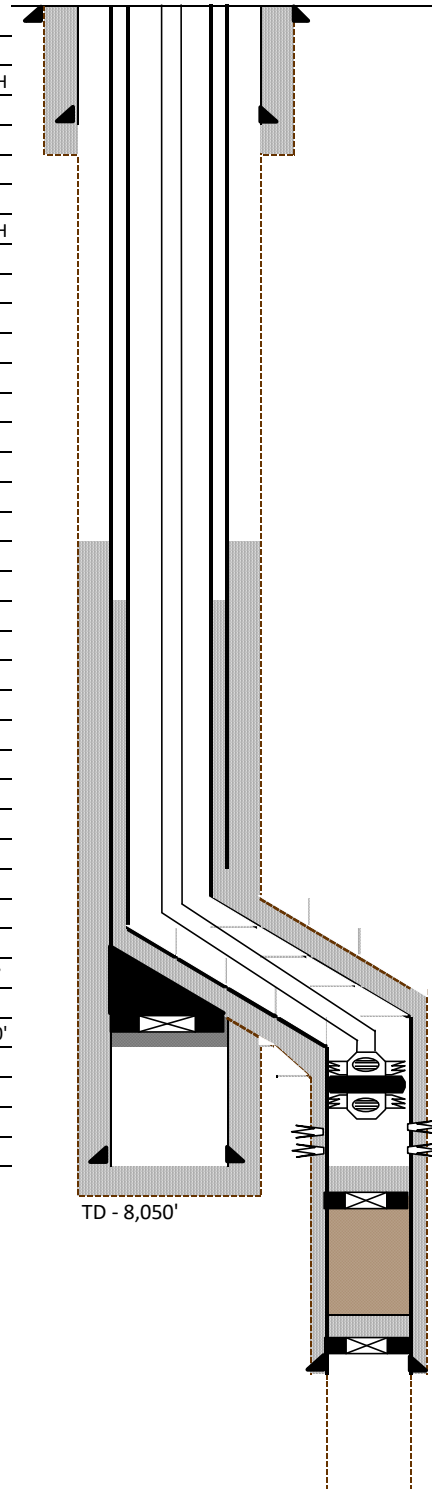
- ☐ Current Completion
- ☒ Planned Completion

Last Edited 6/23/2020  
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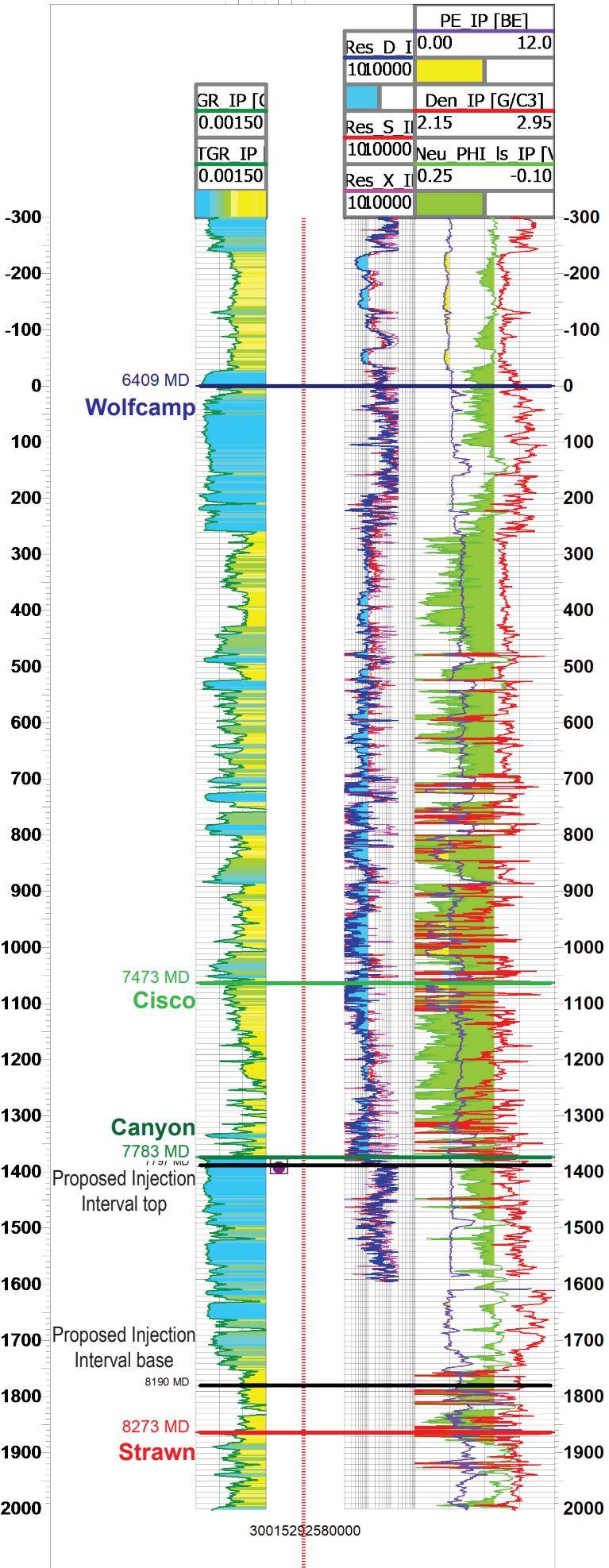


### Completion Data

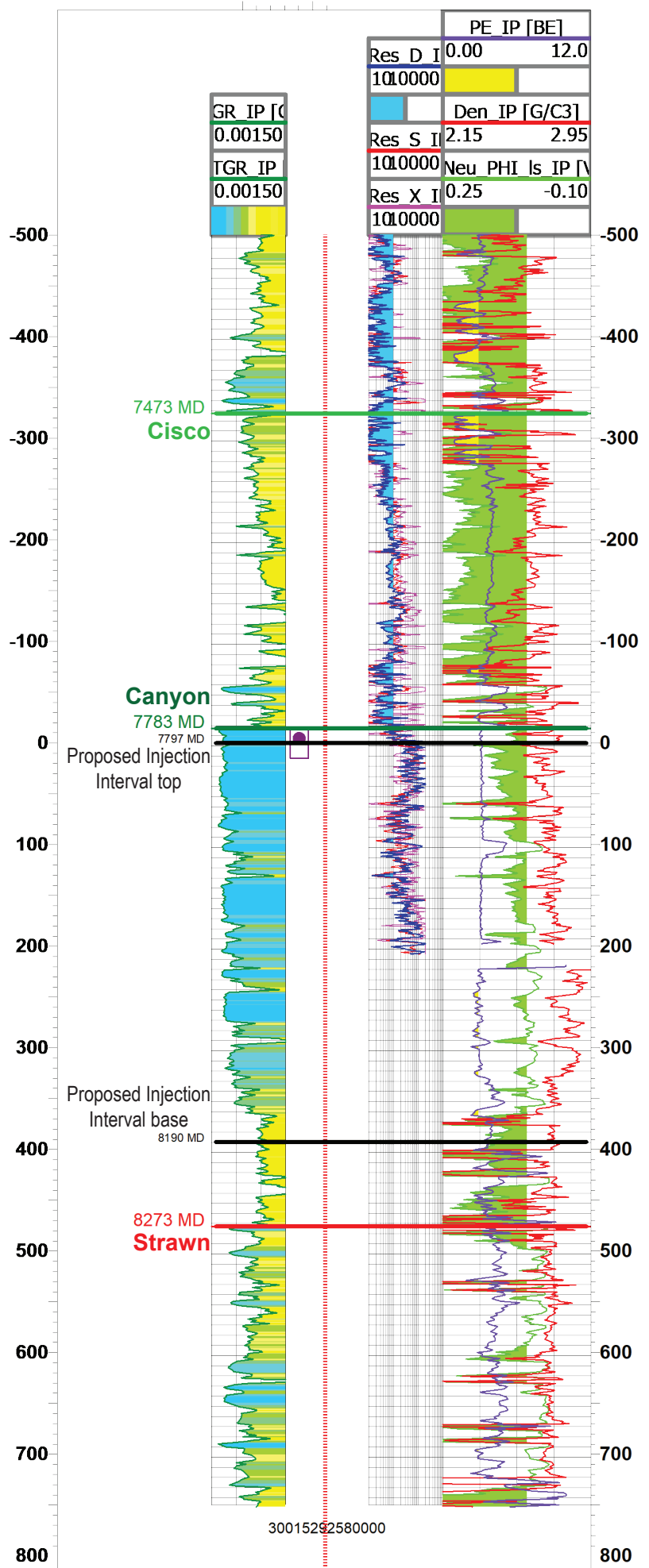
Cmt W/700 sx to srf
TOC @ 6550' Per Temp log
Cmt W/150sx
Mill Window 7,759' - 7,768'
Packer @ 7,768'
Cisco/Canyon Perfs
7,796'-8,190'
CIBP @ 8,290' w/ 30' of Class H Cmt
6-1/8" - OH
CIBP @ 10,225' w/ 100' of Class H Cmt
5-1/2" 17# N-80 DTS4
@ 10,250'
4 - 3/4" - OH
Open hole 10250'-10559'

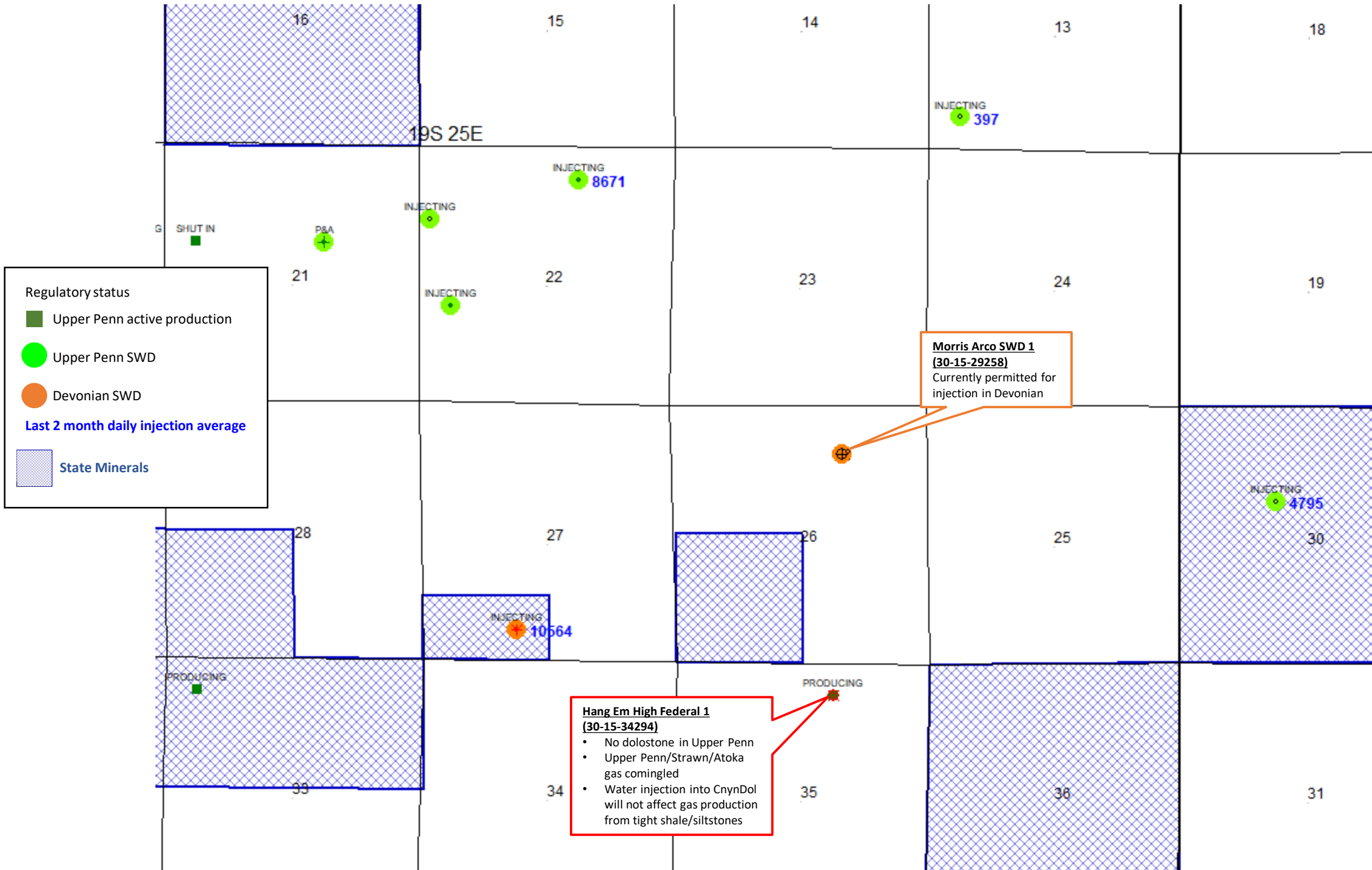


Offset: 0 166

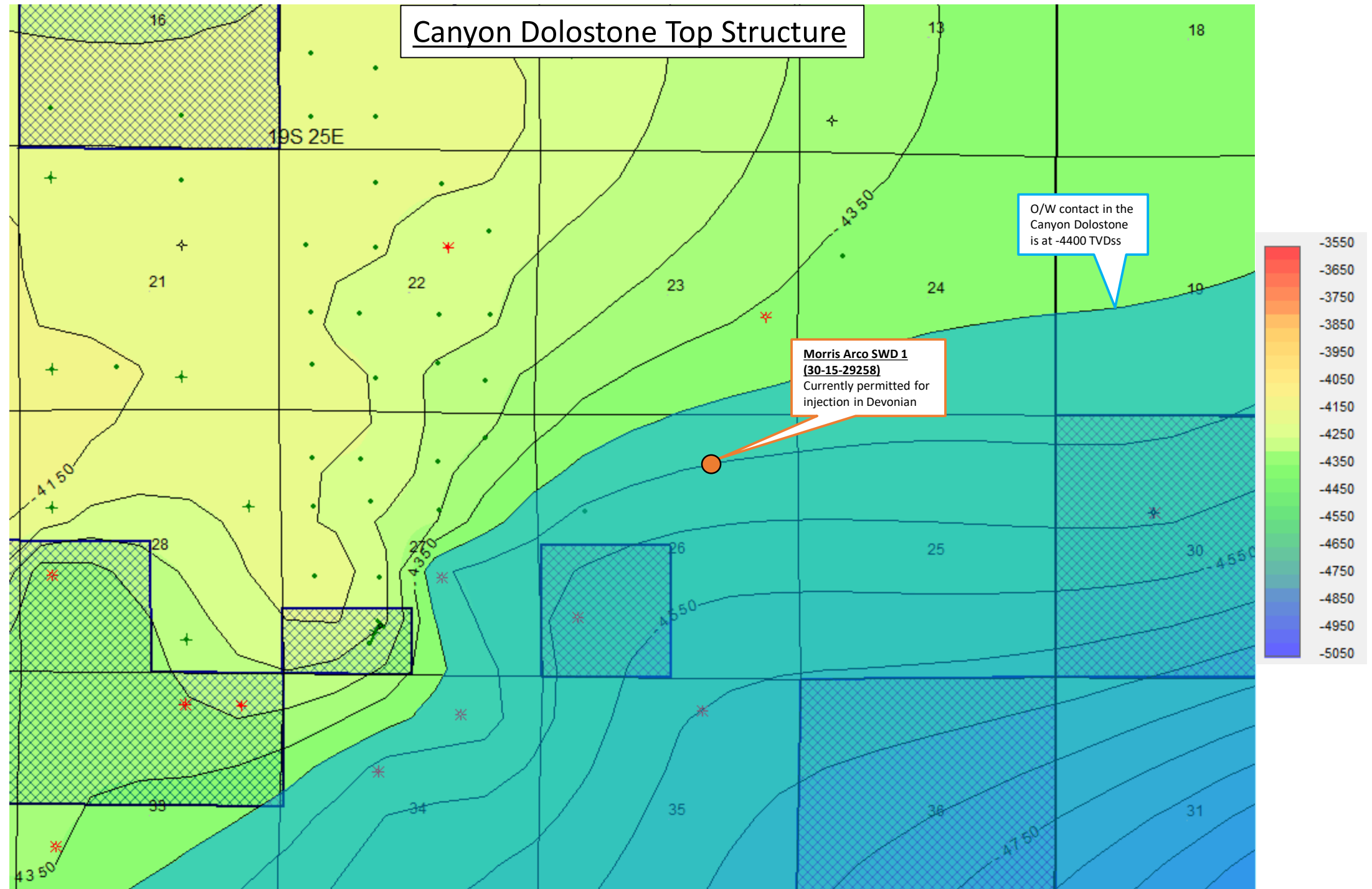


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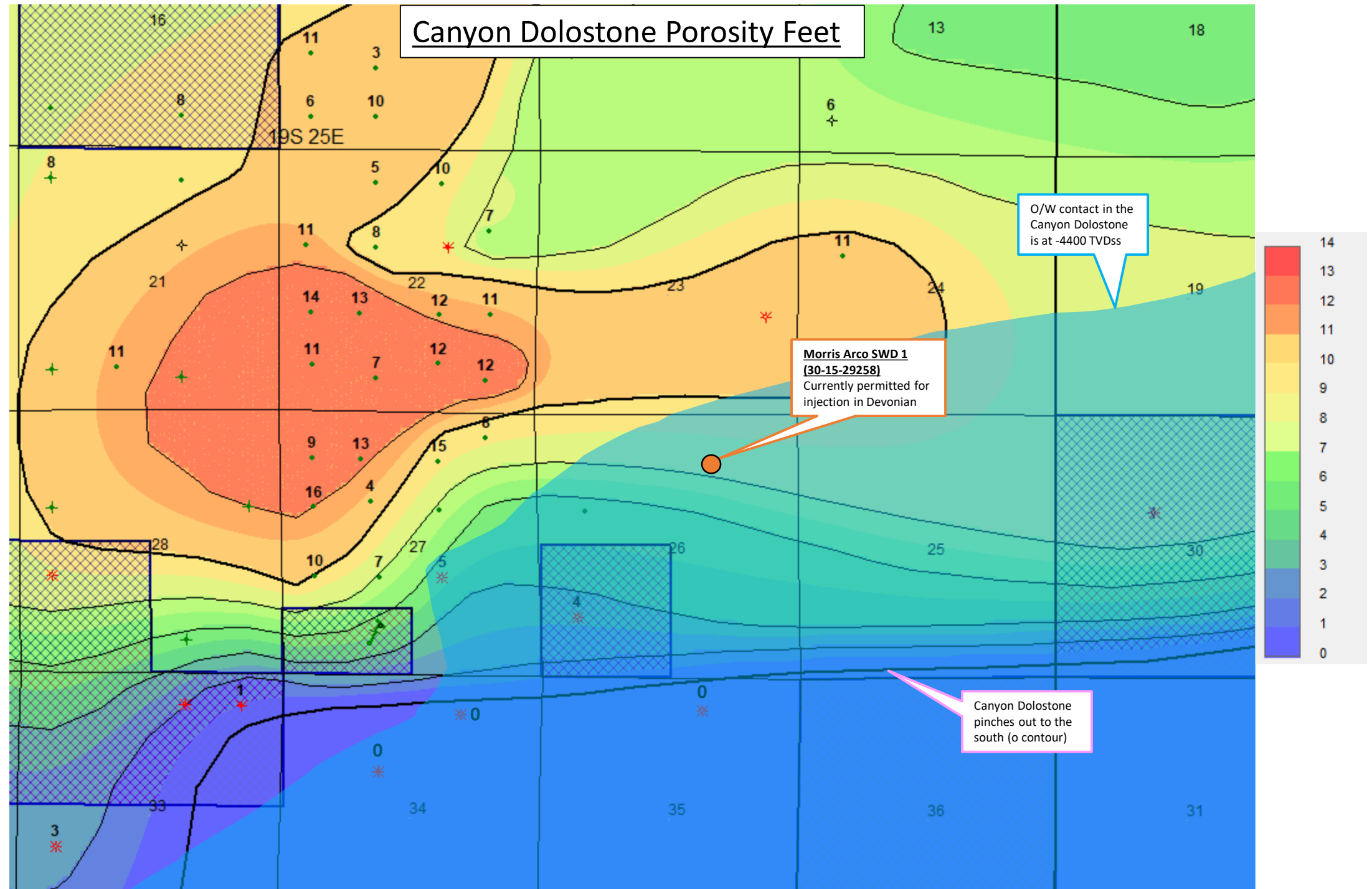




# Canyon Dolostone Top Structure

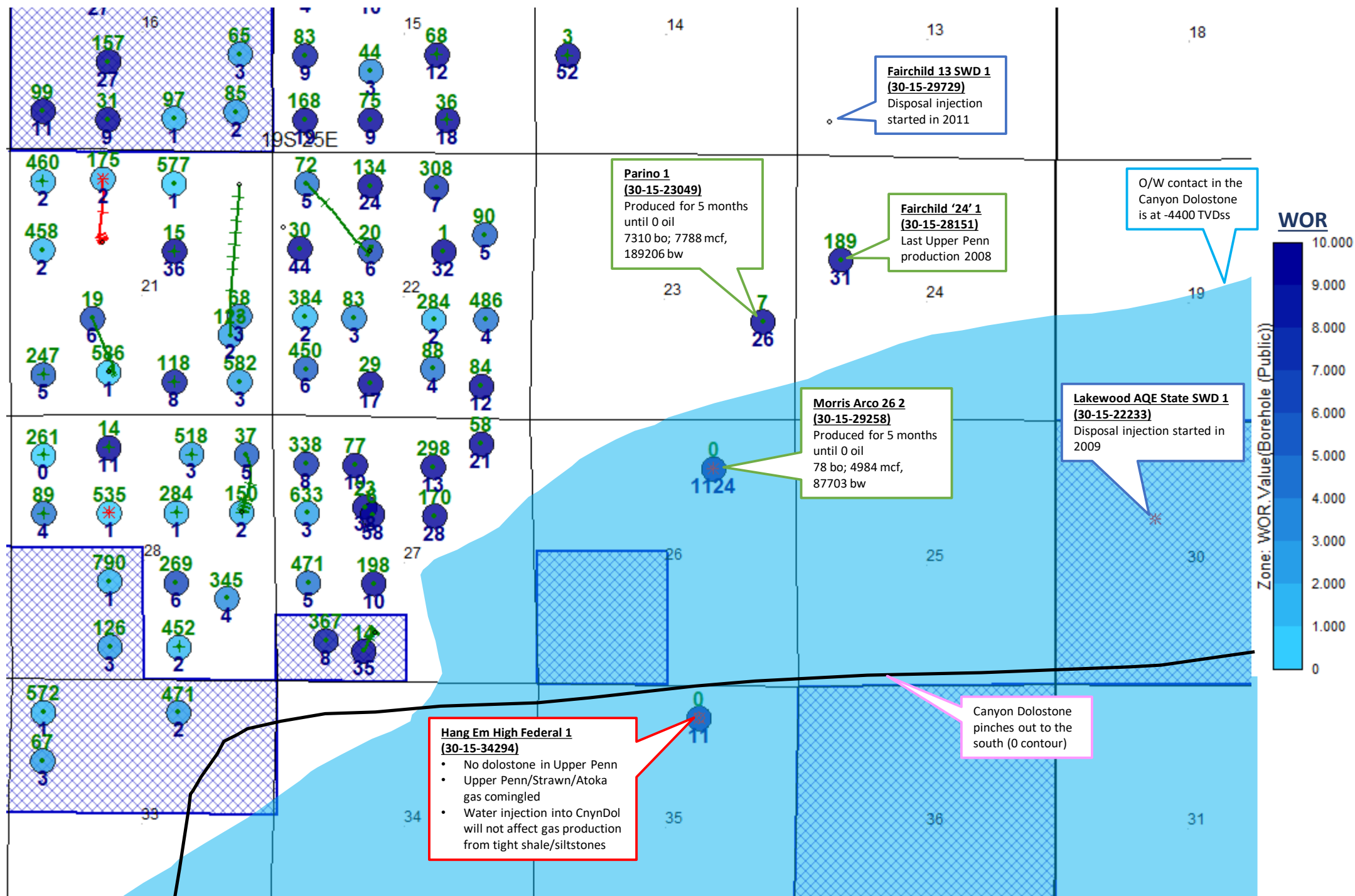


# Canyon Dolostone Porosity Feet



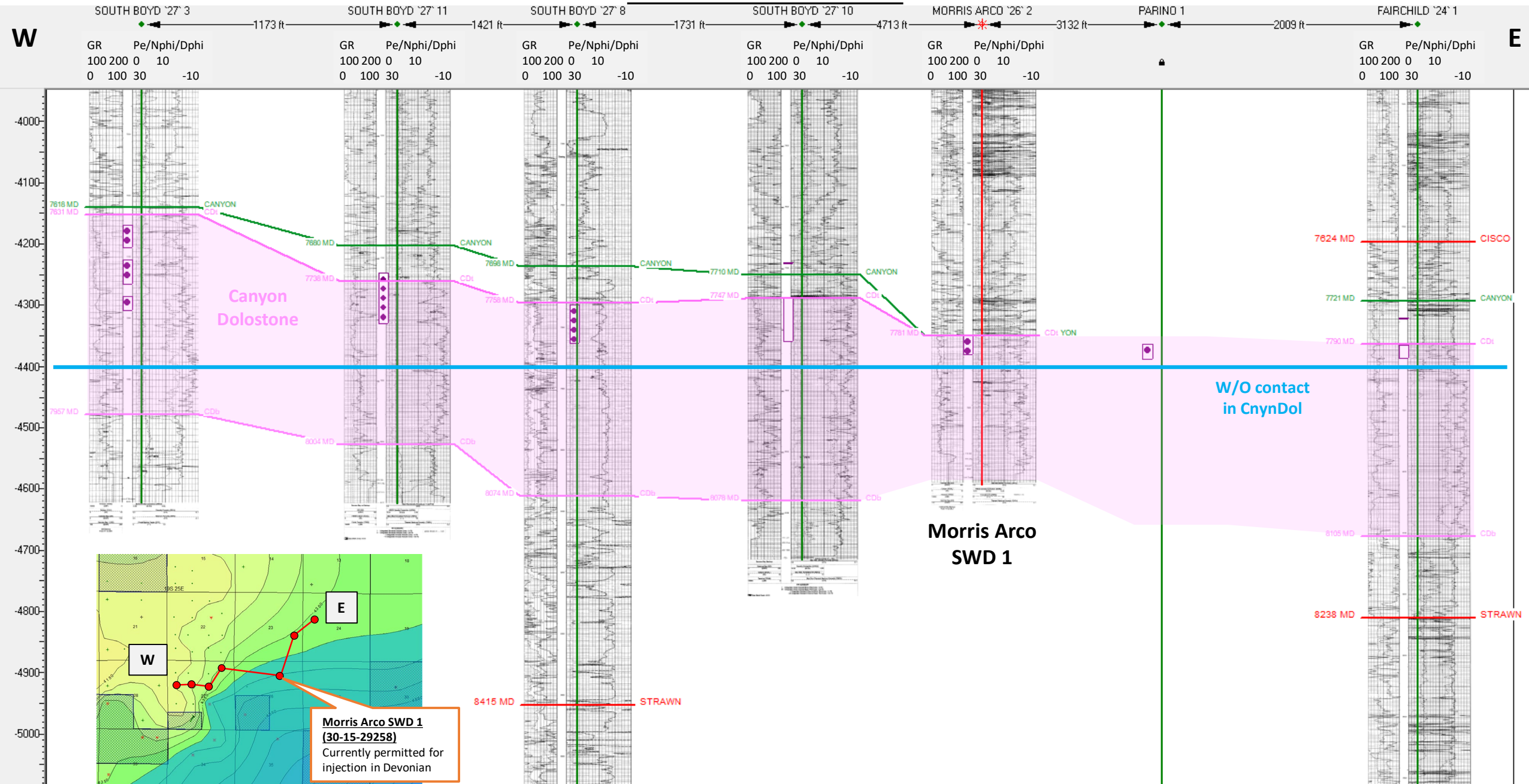
Upr Penn  
Production

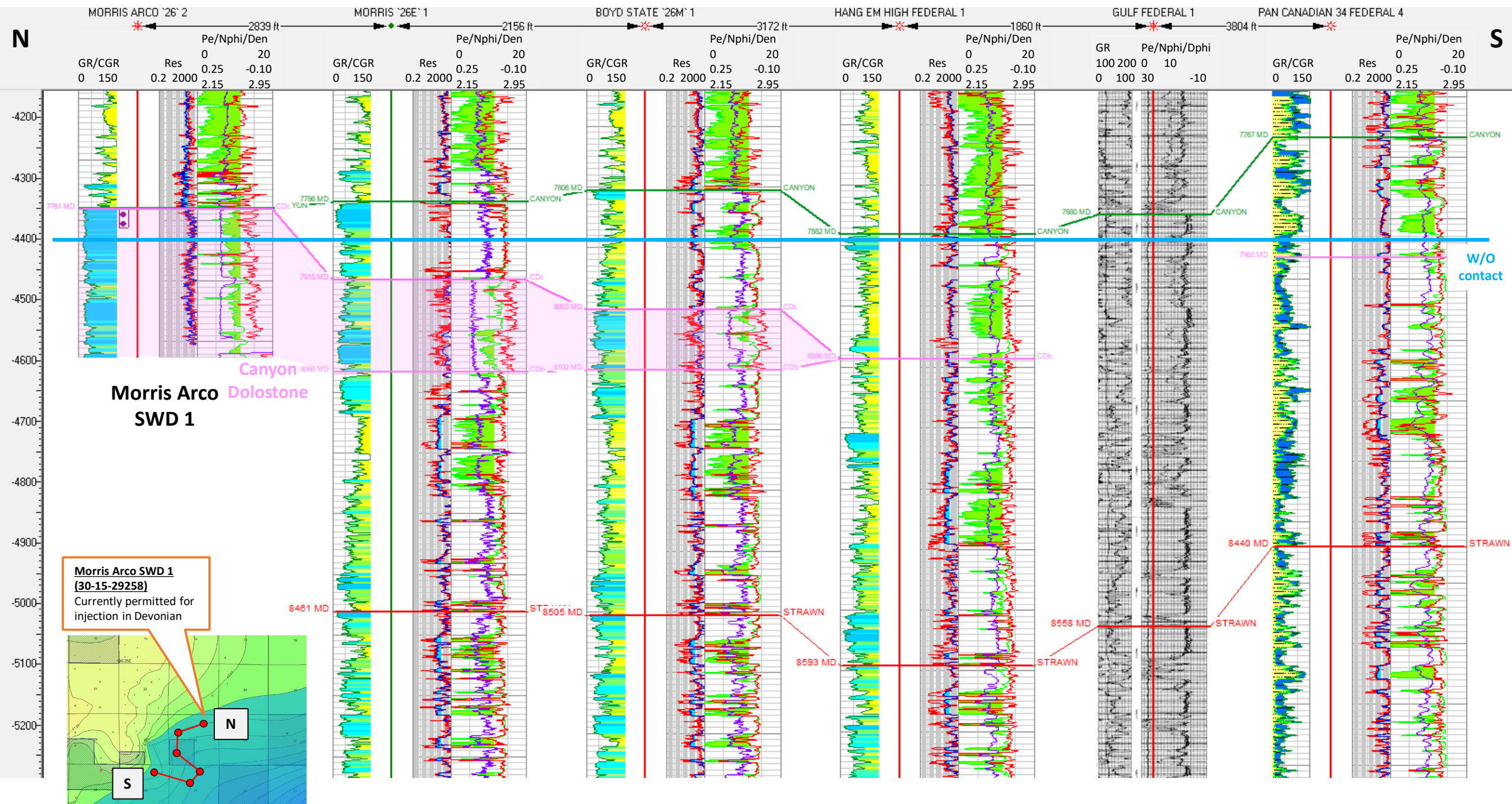
458 CUM Oil/k  
2 WOR

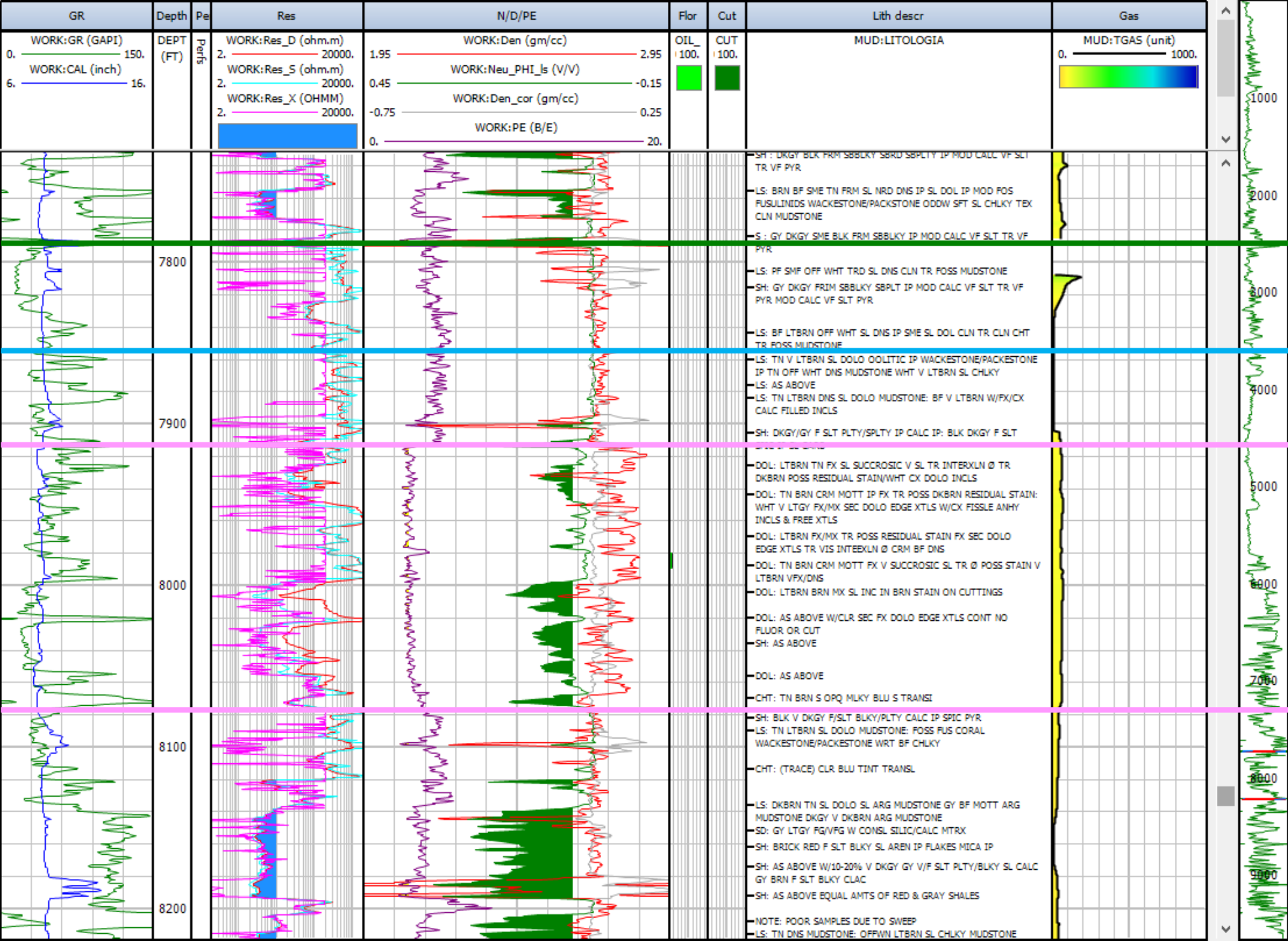




# Structural Cross Section







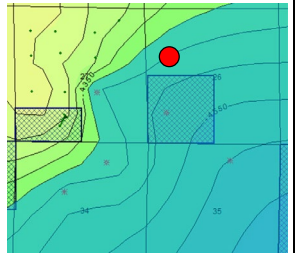
Canyon

W/O contact  
CnynDol

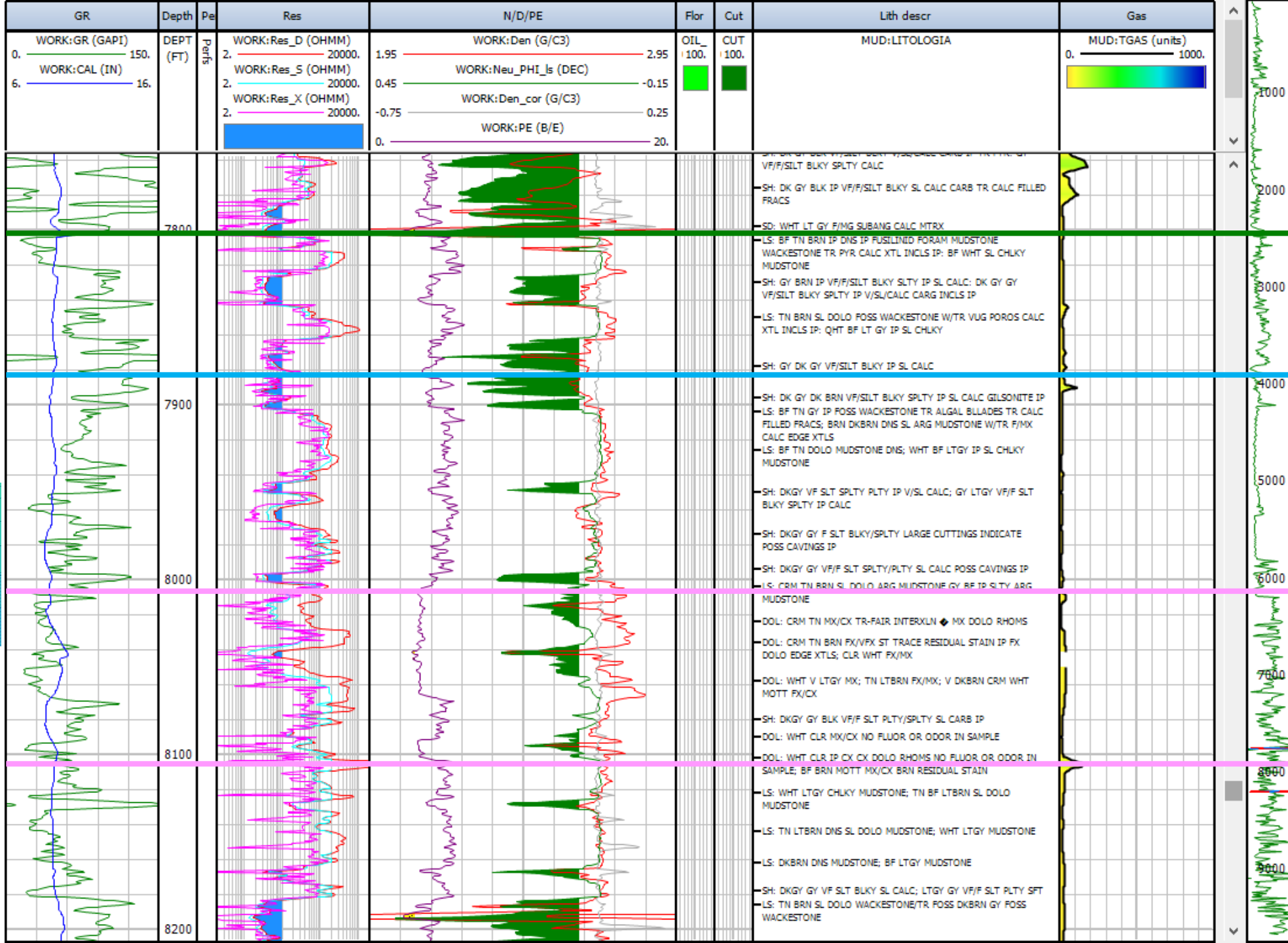
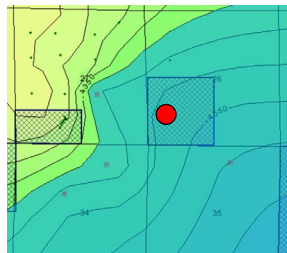
Canyon  
Dolostone top

Canyon  
Dolostone base

Morris 26E 1  
Mudlog



# Boyd State 26M 1 Mudlog



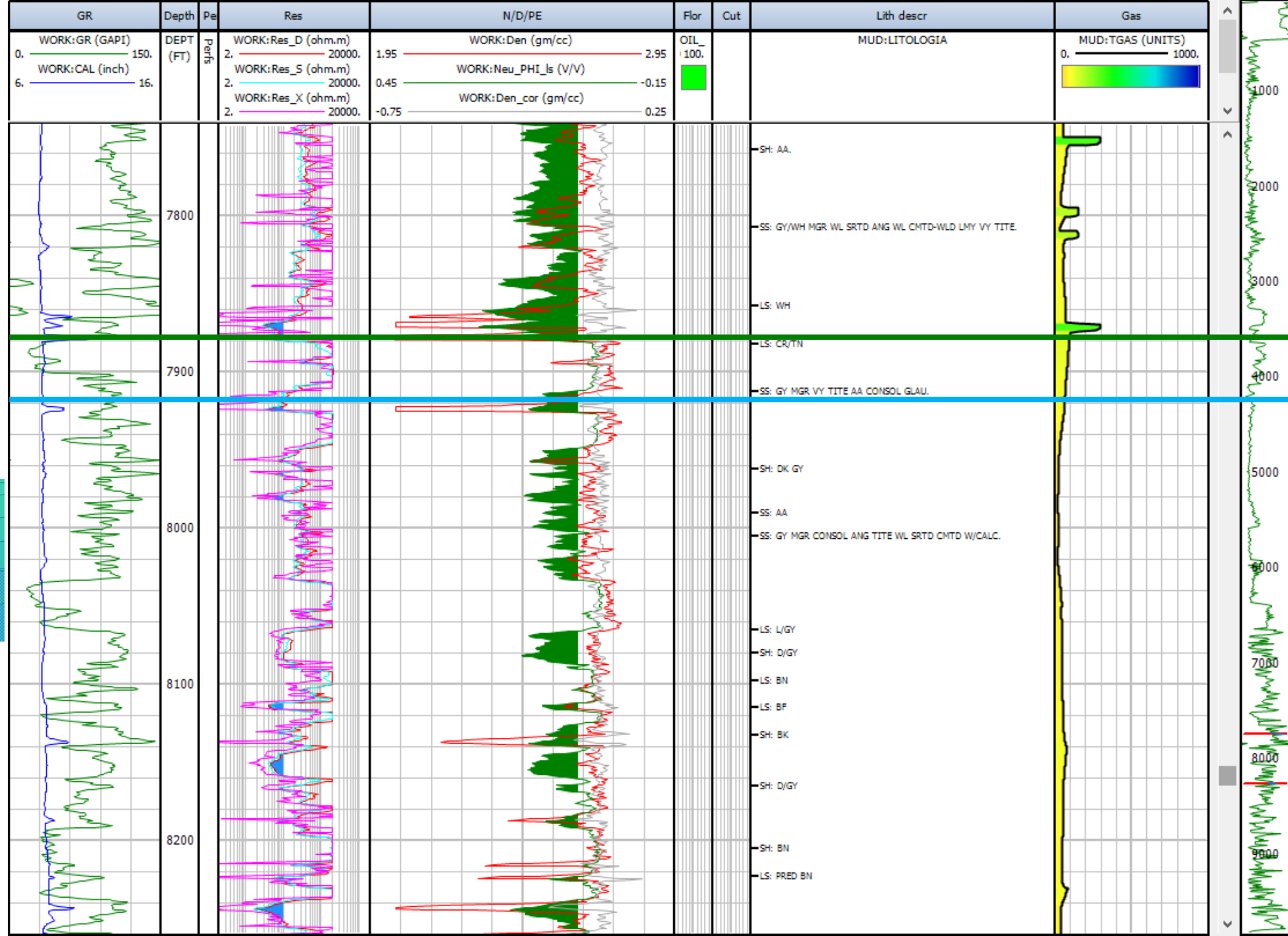
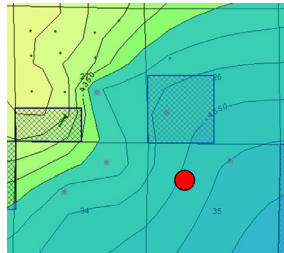
Canyon

W/O contact  
CnynDol

Canyon  
Dolostone top

Canyon  
Dolostone base

# Gulf Fed 1 Mudlog

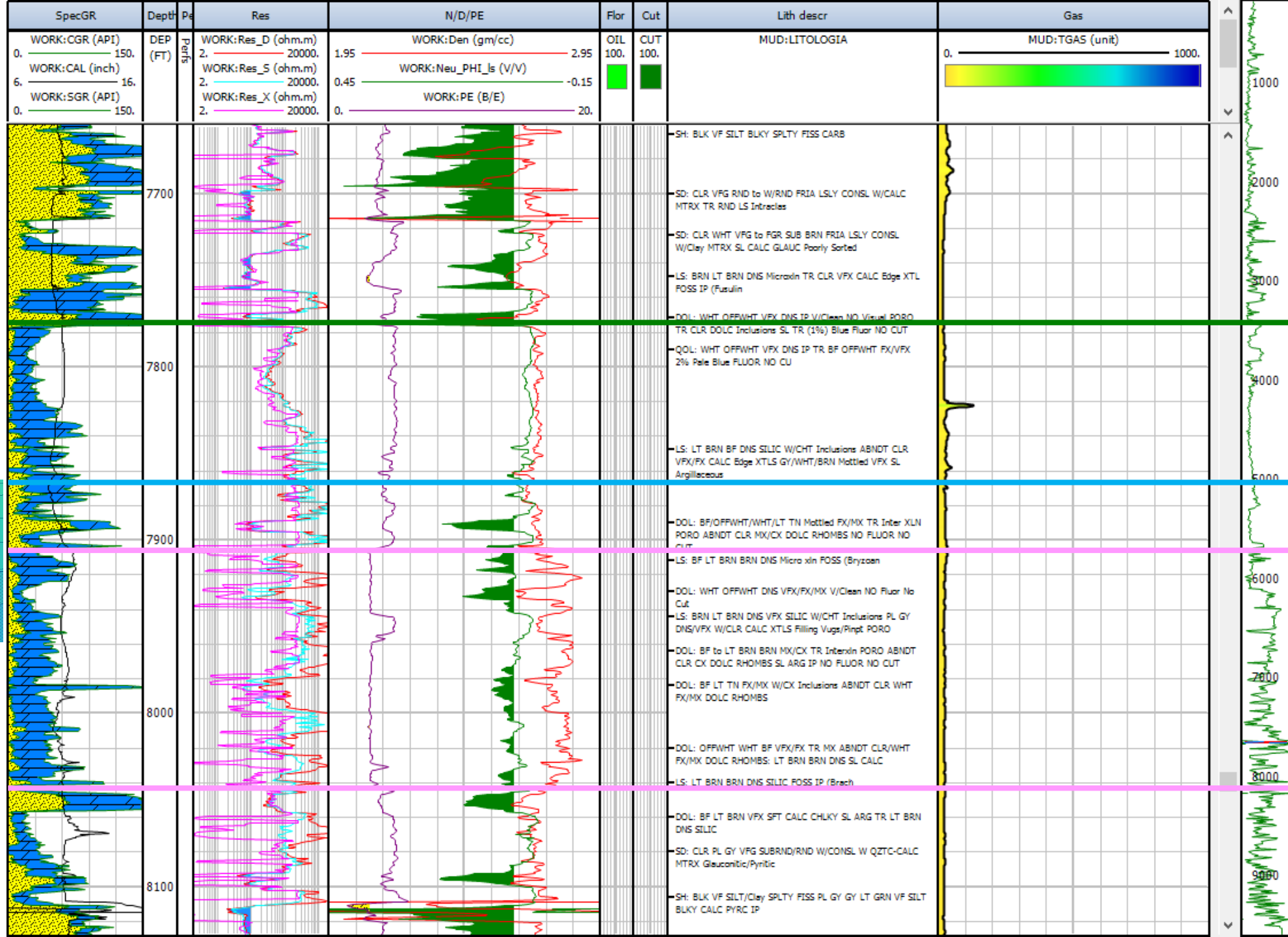
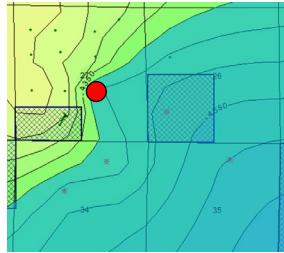


Canyon

W/O contact  
CnynDol

Canyon  
Dolostone  
not present

# Hawk 27 Federal 1 Mudlog



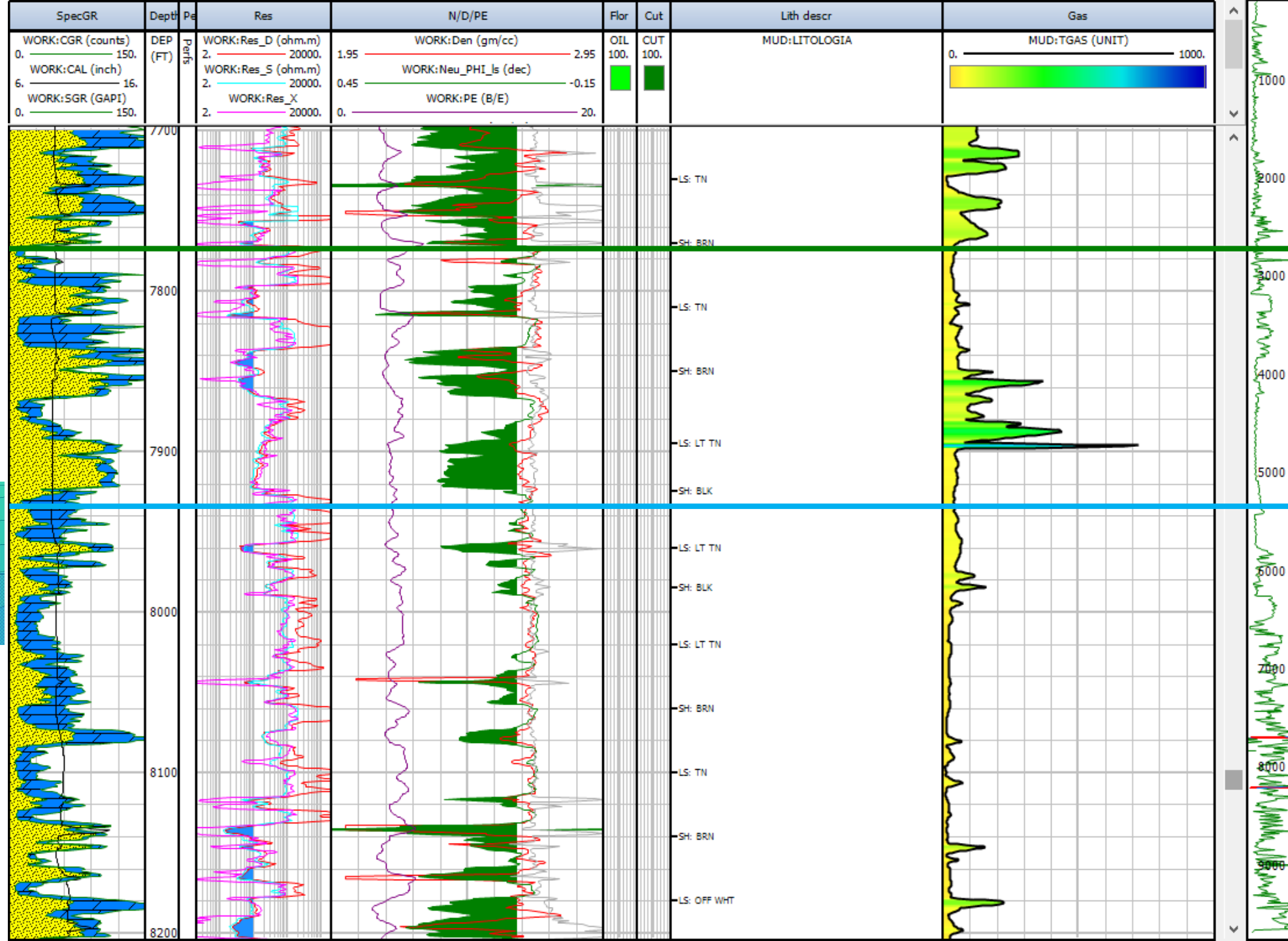
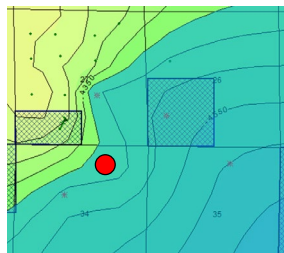
Canyon

W/O contact  
CnynDol

Canyon  
Dolostone top

Canyon  
Dolostone base

Pan Canadian  
34 Fed 4  
Mudlog



Canyon

W/O contact  
CnynDol

Canyon  
Dolostone  
not present



April 13, 2020

Spur Energy Partners LLC examined all available geologic and engineering data and have found no evidence for increased risk of seismicity with the proposed disposal well. Utilizing proprietary 3D seismic data covering the area of interest, we have not interpreted any faults and/or linear features near the subject well. The proposed injection interval within the Canyon formation is greater than 7,000 feet shallower than basement in the area and was previously produced for decades removing 10's of millions or barrels of fluid.

C.J. Lipinski  
V.P. Geology

## Rose-Coss, Dylan H, EMNRD

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**From:** Sarah Chapman <schapman@spurepllc.com>  
**Sent:** Monday, April 13, 2020 8:04 AM  
**To:** Rose-Coss, Dylan H, EMNRD  
**Subject:** [EXT] RE: Seismic Question - Morris Arco 26 #2 SWD

Great thank you.

We have a couple of more maps and things to add to the application but before I sent everything over I wanted to check on that.

Would you like me to mail in everything or would a PDF attachment in an e-mail suffice?

Thanks again,  
Sarah

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**From:** Rose-Coss, Dylan H, EMNRD <DylanH.Rose-Coss@state.nm.us>  
**Sent:** Thursday, April 9, 2020 3:56 PM  
**To:** Sarah Chapman <schapman@spurepllc.com>  
**Subject:** RE: Seismic Question - Morris Arco 26 #2 SWD

[EXTERNAL]  
Hi Sarah,

Yes, the provided statement will suffice. We're this application to be protested, or require a hearing, Spur would probably benefit from providing more information. However, because this isn't a contested Devonian injector, I can use the provided statement to check the box on my review.

As an example of a more in depth analysis I have attached a fault slip potential analysis that was presented at a hearing. If you would like to study the case a little further feel free to reference the image files for Case no. 20751.

Short of providing a full on model simulation it would be nice to see a structural map of the area and an determination of the wells distance from the nearest fault. Additional information that is helpful in the analysis is a review of the historic earthquake catalogue and a reference to the date of the most recent and most proximal earthquakes.

Anyway, I will add the information to the record and send regards to you, your family and their safety.

Cheers,

**Dylan Rose-Coss**

*Petroleum Specialist*  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

O: (505) 476-3477



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**From:** Sarah Chapman <[schapman@spurepllc.com](mailto:schapman@spurepllc.com)>  
**Sent:** Thursday, April 9, 2020 7:54 AM  
**To:** Rose-Coss, Dylan H, EMNRD <[DylanH.Rose-Coss@state.nm.us](mailto:DylanH.Rose-Coss@state.nm.us)>  
**Subject:** [EXT] Seismic Question - Morris Arco 26 #2 SWD

Good morning Dylan,  
I am working on compiling the information discussed from our meeting in early March and had a question about the seismic study.  
My geos provided me with this but do you have something else in mind?

Hope you and your family are staying safe.

Sarah Chapman  
Regulatory Director  
**SPUR ENERGY PARTNERS LLC**  
920 Memorial City Way, Suite 1000 | Houston, TX 77024  
Cell: (281) 642-5503  
Direct: (832) 930-8613  
Office: (832) 930-8502  
[schapman@spurepllc.com](mailto:schapman@spurepllc.com)



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District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

Form C-141  
Revised August 24, 2018  
Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party Percussion Petroleum Operating, LLC	OGRID 371755
Contact Name Jerry Matthews	Contact Telephone 575-748-5234
Contact email Jerry@percussionpetroleum.com	Incident # (assigned by OCD) NAB1900732571
Contact mailing address 156 Rock Daisy Road Lakewood, NM 88254	

### Location of Release Source

Latitude 32.63353 \_\_\_\_\_ Longitude -104.4606 \_\_\_\_\_  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name Morris 26E #1	Site Type State
Date Release Discovered 10/29/2018	API# (if applicable) 30-015-26057

Unit Letter	Section	Township	Range	County
E	26	19S	25E	Eddy

Surface Owner: ☒ State ☐ Federal ☐ Tribal ☐ Private (Name: \_\_\_\_\_)

### Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input checked="" type="checkbox"/> Crude Oil	Volume Released (bbls) 65 bbls	Volume Recovered (bbls) 60 bbls
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 190 bbls	Volume Recovered (bbls) 180 bbls
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)


Cause of Release: Failure of transfer pump that sends produced water to a SWD.

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? >25 bbls
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? Toby Rhodes to Mike Bratcher (Email, 10/29/18 3:30 PM)	

### Initial Response

*The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury*

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why:   	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
Printed Name: <u>Michael Martin</u>	Title: Petroleum Engineer
Signature: 	Date: <u>6/12/2019</u>
email: <u>_Michael@percussionpetroleum.com</u>	Telephone: <u>__(713) 429-4249</u>
<b><u>OCD Only</u></b>  Received by: _____ Date: _____	

Incident ID	
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	60-220' (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

<p><b>Characterization Report Checklist:</b> <i>Each of the following items must be included in the report.</i></p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.</li><li><input checked="" type="checkbox"/> Field data</li><li><input checked="" type="checkbox"/> Data table of soil contaminant concentration data</li><li><input checked="" type="checkbox"/> Depth to water determination</li><li><input checked="" type="checkbox"/> Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release</li><li><input type="checkbox"/> Boring or excavation logs</li><li><input checked="" type="checkbox"/> Photographs including date and GIS information</li><li><input checked="" type="checkbox"/> Topographic/Aerial maps</li><li><input checked="" type="checkbox"/> Laboratory data including chain of custody</li></ul>
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If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

Incident ID	
District RP	
Facility ID	
Application ID	

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: \_\_Natalie Gladden\_\_\_\_\_ Title: \_\_Environmental and Regulatory Director\_\_\_\_\_

Signature:\_\_\_\_\_ Date: \_\_\_\_\_

email: \_Natalie.Gladden@whitebuffalo.com\_ Telephone: \_\_575-390-6397\_\_\_\_\_

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Incident ID	
District RP	
Facility ID	
Application ID	

## Remediation Plan

**Remediation Plan Checklist:** *Each of the following items must be included in the plan.*

- ☒ Detailed description of proposed remediation technique
- ☒ Scaled sitemap with GPS coordinates showing delineation points
- ☒ Estimated volume of material to be remediated
- ☒ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☒ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

**Deferral Requests Only:** *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- ☒ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☒ Extents of contamination must be fully delineated.
- ☒ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: Natalie Gladden\_\_\_\_\_ Title: Environmental and Regulatory Director\_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

email: \_natalie.gladden@whitebuffalo.com\_\_\_\_\_ Telephone: \_\_\_\_\_575-390-6397\_\_\_\_\_

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Incident ID	
District RP	
Facility ID	
Application ID	

## Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

**Closure Report Attachment Checklist: *Each of the following items must be included in the closure report.***

- ☒ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☒ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☒ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☒ Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Natalie Gladden Title: Environmental and Regulatory Director

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

email: natalie.gladden@whitebuffalo.com Telephone: 575-390-6397

### **OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

6/9/2020

**State of New Mexico**  
**Energy, Minerals and Natural Resources Department**  
**Oil Conservation Division**



## Receipt of Fee Application Payment

**PO Number: CESNW-200609-C-1410**

Payment Date: 6/9/2020 1:29:01 PM

Payment Amount: \$150.00

Payment Type: Credit Card

Application Type: Application for administrative approval of a release notification and corrective action.

Fee Amount: \$150.00

Application Status: Under OCD Review

OGRID: 328947

First Name: Natalie

Last Name: Gladden

Email: natalie@energystaffingllc.com

**IMPORTANT:** If you are mailing or delivering your application, you must print and include your receipt of payment as the first page on your application. All mailed and delivered applications must be sent to the following address: 1220 S. St. Francis Dr., Santa Fe, NM 87505. For inquiries, reference the PO Number listed above.