JAMES BRUCE ATTORNEY AT LAW

POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

369 MONTEZUMA, NO. 213 SANTA FE, NEW MEXICO 87501

(505) 982-2043 (Phone) (505) 660-6612 (Cell) (505) 982-2151 (Fax)

jamesbruc@aol.com

June 21, 2012

Hand delivered

Jami Bailey, Director Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

Re: Application of Targa Midstream Services, LLC for administrative amendment to increase maximum operating pressure under Order Nos. R-13052 and R13052-A, Monument Acid Gas Injection Well, Lea County, New Mexico

Dear Ms. Bailey:

Momentum Operating Co., Inc. objects to the above application.

Very truly yours,

Attorney for Momentum Operating Co., Inc.

cc: Geolex Inc.

was the out No HEARing was REQUESTED OL INITIATED BY MOMENTUM". ON 7/9/12, RELEASED PERMIT as ACTIVE AT INSTRUCTION OF GABRIEVE GERHOLT,



EXHIBIT A

APPLICATION OF TARGA MIDESTREAM SERVICES LIMITED PARTNERSHIP TO AMEND ORDER NO. R-13052

Operators:

Apache Corp. 6120 S. Yale Suite 1500 Tulsa, OK 74136 XTO Energy Inc. 3000 N. Garfield Suite 175 Midland, TX 79705

Chesapeake Operating, Inc. P.O. Box 18496 Oklahoma City, OK 73154-0496

Chevron USA, Inc. P.O. Box 1150 Midland, TX 79702

Cimarex Energy Co. of Colorado 600 N. Marienfield Midland, TX 79701

EnerVest Operating LLC 1001 Fanin Street Suite 800 Houston, TX 77002

Mr. Jack Huff P.O. Box 50190 Midland, TX 79710

Momentum Operating Co., Inc. P.O. Box 878 Albany, TX 76430

Rice Operating Company 122 W. Taylor Hobbs, NM 88240



June 18, 2012

Apache Corp. 6120 S. Yale #1500 Tulsa OK 74136

Re: NMOCD Case No. 14161: Application of Targa Midstream Services, LLC to For Administrative Amendment to Increase the Maximum Operating Pressure under Order Nos. R-13052 & R-13052A Concerning the Monument Acid Gas Injection Well, Lea County, New Mexico

Dear Sir/Madam:

Pursuant to paragraph 10 of Oil Conservation Division Order No. R-13052, this letter provides notice that Targa Midstream Services, LLC ("Targa") has requested an administrative modification of Order No. R-13052 to increase the maximum operating pressure for the Monument AGI #1 well from 1660 psig to 3000 psig. A copy of the application is included with this letter.

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Sincerely, Geolex, Inc.

Alberto A. Gutierrez, RG Consultant to Targa Midstream Services LLC

Enclosure

I:\12-006\Notice Letters\Individual Notice Letters\Apache Certified Letter re Admin App. re Pressure Ver 2 (W1714615).DOCX



June 18, 2012

Chesapeake Operating, Inc. PO Box 18496 Oklahoma City OK 73154-0496

Re: NMOCD Case No. 14161: Application of Targa Midstream Services, LLC to For Administrative Amendment to Increase the Maximum Operating Pressure under Order Nos. R-13052 & R-13052A Concerning the Monument Acid Gas Injection Well, Lea County, New Mexico

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Alberto A. Gutierrez, RG Consultant to Targa Midstream Services LLC

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Alberto A. Gutiérrez, C.P.G.



VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

June 18, 2012

Chevron USA, Inc. P.O. Box 1150 Midland, TX 79702

Re: NMOCD Case No. 14161: Application of Targa Midstream Services, LLC to For Administrative Amendment to Increase the Maximum Operating Pressure under Order Nos. R-13052 & R-13052A Concerning the Monument Acid Gas Injection Well, Lea County, New Mexico

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phone: 505-842-8000 fax: 505-842-7380 500 Marquette Avenue NW, Suite 1350 Albuquerque, New Mexico 87102 email: aag@geolex.com web: www.geolex.com



June 18, 2012

Cimarex Energy Co. of Colorado 600 N. Marienfield Midland, TX 79701

Re: NMOCD Case No. 14161: Application of Targa Midstream Services, LLC to For Administrative Amendment to Increase the Maximum Operating Pressure under Order Nos. R-13052 & R-13052A Concerning the Monument Acid Gas Injection Well, Lea County, New Mexico

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phone: 505-842-8000 fax: 505-842-7380 500 Marquette Avenue NW, Suite 1350 Albuquerque, New Mexico 87102 email: aag@geolex.com web: www.geolex.com

June 18, 2012

EnerVest Operating LLC 1001 Fanin Street Suite 800 Houston, TX 77002

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500 Marquette Avenue NW, Suite 1350 Albuquerque, New Mexico 87102 email: aag@geolex.com web: www.geolex.com



June 18, 2012

Mr. Jack Huff P.O. Box 50190 Midland, TX 79710

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June 18, 2012

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500 Marquette Avenue NW, Suite 1350 Albuquerque, New Mexico 87102 email: aag@geolex.com web: www.geolex.com

Alberto A. Gutiérrez, C.P.G.



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June 18, 2012

XTO Energy Inc. 3000 N. Garfield #175 Midland, TX 79705

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06/13/2012			Monument AGI #1 C-103	Subsequent for SRT
Submit 1 Copy To Appropriate District	State of New Mey			Form C-103
Office <u>District</u> 1625 N. Attachment <u>District</u> 811 S. Fi to Notice Letter L	ergy, Minerals and Natural Resources		Rev WELL API NO.	ised August 1, 2011
District]			30-025-40002	
811 S. Fi to Notice Letter	CONSERVATION		5. Indicate Type of Lease	;
District 1 100 Rio	1220 South St. Fran		STATE	FEE 🛛 BLM
District I 1220 S. S	Santa Fe, NM 87	505	6. State Oil & Gas Lease	No.
<u>87505</u>			N/A	
	REPORTS ON WELLS		7. Lease Name or Unit A	greement Name
(DO NOT DIFFERE והאביטייינשטיינער און KESERVOIR. USE "APPLICATION FOR	ILL OR TO DEEPEN OR PLU PERMIT" (FORM C-101) FO		Monument AGI	
PROPOSALS.)			8. Well Number #1	
1. Type of Well: Oil Well Gas Well 2. Name of Operator Targa Midstream Service		cuon	9. OGRID Number	
2. Name of Operator Farga Midsucani Service	<i>5</i> , EI		24650	
3. Address of Operator 1000 Louisiana, Ste. 4	300, Houston, TX 77002		10. Pool name or Wildca	
· · ·		·	Wildcat AGI in Devonian	/Fusselman
4. Well Location				
	eet from theS_			
Section 36	Township 19S	Range 36E		County Lea
II. Eleva	tion <i>(Show whether DR,</i> 3571 GR	RKB, RT, GR, etc.)		
12. Check Appropria	te Box to Indicate N	ature of Notice	Report or Other Data	
	te Dox to indicate 14		Report of Other Data	
NOTICE OF INTENTIO			SEQUENT <u>REPORT</u>	
		REMEDIAL WOR		
		COMMENCE DRI		A LI
PULL OR ALTER CASING DULTIPL		CASING/CEMEN	ГЈОВ 📋 .	
OTHER:		OTHER: conduct	high rate step rate test for N	IAOP increase⊠
13. Describe proposed or completed opera	tiona (Clearly state all y	autinant dataila an	d airea mantinant dataa inalu	ding actimated data
of starting any proposed work). SEE I				
proposed completion or recompletion.		. i or muniple cor	ipretions. Traden wencore	alugium of
Operator conducted a high rate step rate				
support a request for an administrative				
the test 48, 24 and 12 hours prior to the contractor (Geolex, Inc.) was in contact				
effort providing interim results and dis	cussing test modification	is based on field an	d reservoir conditions enco	untered. The
originally approved C-103 included a	simultaneous temperature	e survey which had	to be discontinued due to a	malfunction of,
and undue stess on, the downhole sens			bottom hole pressure as a	conservative
indication was approved by Mr. Gonza	iles prior to restarting the	e test.		
This subsequent report includes all of	the data obtained during	the test and all supr	orting analyses.	
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		.,		,
Spud Date:	Rig Release Da	te:		
· · ·		<u> </u>		
I hereby certify that the information above is tru	ue and complete to the h	est of my knowledg	e and helief	
Thereby certify that the mormation above is the	' in and complete to the be	st of my knowledg	e and benef.	
SIGNATURE	TITLECons	ultant to Targa Mic	Istream Services DATE	6/13/2012
		~ ·		
Type or print name Alberto A. Gutierrez, RG For State Use Only	E-mail addres	s: <u>aag@geolex.con</u>	<u>n</u> PHONE: 505-259-428	3
For State Use Only		· .		
APPROVED BY:	TITLE	· · · · ·	DATE	
Conditions of Approval (if any):				
· · ·				
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4.

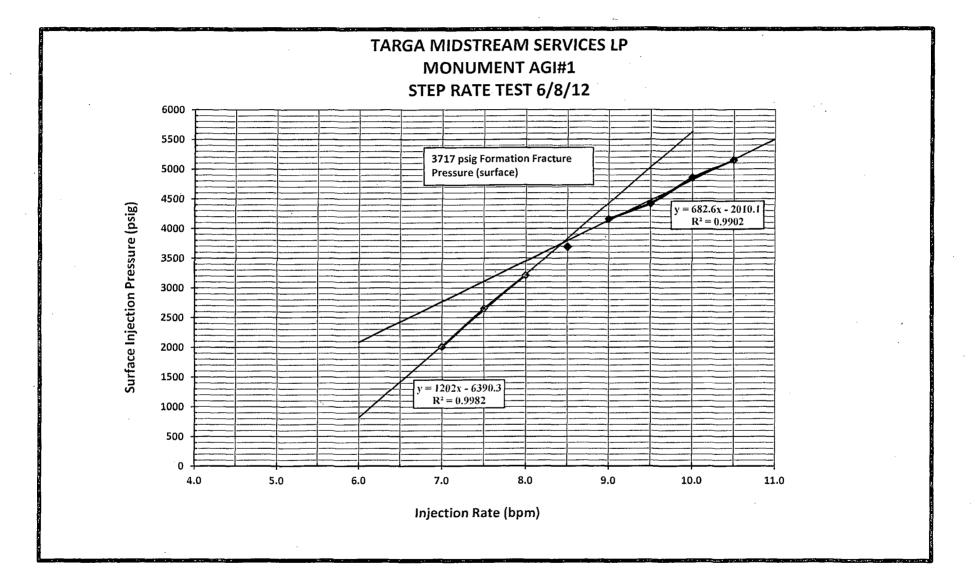
Monument AGI#1 Step Rate Test June 8, 2012

The Monument AGI #1 test was conducted on June 8, 2012 after approved C-103 and notice to the District and Santa Fe. A subsequent C-103 has been prepared and submitted to the District (copy attached). Division representatives reviewed and approved the SRT procedure and were notified of the test to allow for OCD to witness the test. While OCD staff were not physically present during the test, I conferred several times over the telephone during the test with Mr. E.L. Gonzales to discuss the approach and preliminary results. Injection rates during the SRT began at 2.0 bpm to establish a rate for 20 minutes and then ranged from 7 to 10.5 bpm, with 0.5 bpm steps, each lasting 20 minutes. The surface injection pressure. The raw data are included in Appendix A.

A minimum surface pressure of 2009 psig was recorded at the initial test injection rate of 7 bpm and a maximum surface pressure of 5150 psig was recorded during the SRT at an injection rate of 10.5 bpm. The formation fracture pressure at the surface was calculated by graphical interpretation of the rate vs. pressure graph shown in Figure 1. This figure clearly shows that the test achieved the OCD requirement of having at least 3 steps below and 3 steps above the fracture pressure at the surface calculated to be approximately 3717 psig. The SRT was conducted using brine estimated at 10 lbs/gallon.

Based on the anticipated mix of TAG and brine of 70:30, a calculation using OCD's rule of thumb formula included in Table 1 would yield an MAOP of 2893 psig. Clearly this pressure is far below the calculated formation fracture pressure of 3717 psig based on the step rate test conducted on June 8, 2012 since the test was conducted with only brine rather than the TAG/brine mix which will be injected into the well. For this reason, our requested pressure of 3000 psig is a pressure that with the injected fluid will be well below the calculated formation fracture pressure at the surface of 3717 psig (24%) even if the fluid was only brine. Based on the step rate test results and the analysis summarized herein, it is clear that approval of the requested pressure increase will in no way endanger the injection zone, caprock or any overlying formations.

The injection rates and corresponding maximum surface pressures for each step demonstrate that the Devonian/Fusselman injection interval in Targa's Monument AGI #1 is capable of accepting the anticipated TAG/brine mix volumes safely at a pressure of 3000 psig without danger of fracturing the injection zone or any other zones above or below.

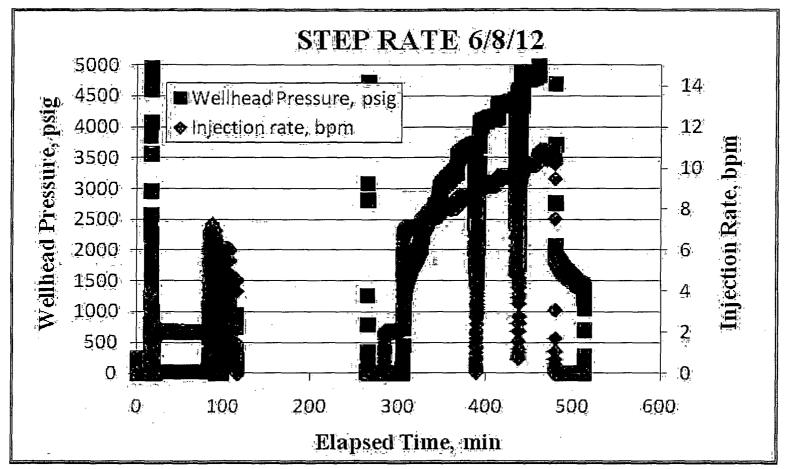


TAG-Water Equivalent MAOP Calculations			· · · · · · · · · · · · · · · · · · ·
TAG Amount MMCFD	Water bbls/day	Ratio	MAOP (psig)
AG ONLY	0	10000	
5	100	88:12	2980
5	200	78:22	2935
5	300	70:30	2893
5	400	64:36	2854
5	720	50:50	2746
Mater Only	400	01100	1778
AG Only	0	10000	3028
2.5	100	78:22	2935
2.5	200	64:36	2854
2.5	300	54:46	2784
2.5	. 360	50:50	2746
2.5	. 400	47:53	2722
CALCULATION OF MAXIMUM INJECTION PRESSURE LIMITA	ATION		
$SG_{bif} = (SG_{WW} * Vol_{WW} + SG_{TAG} * Vol_{TAG})/(Vol_{WW} + Vol_{TAG})$	······································		where TAG SG = .66 and Water =10.2ppg
PG = 0.2 + 0.433 (1.04-SG _{bif})	psi/ft		
IP _{max} = PG *Depth	psi		
Where: SG _{bif} , SG _{ww} , and SG _{TAG} are specific gravities of blend respectively; Vol _{ww} and Vol _{TAG} are injected volumes of wate			

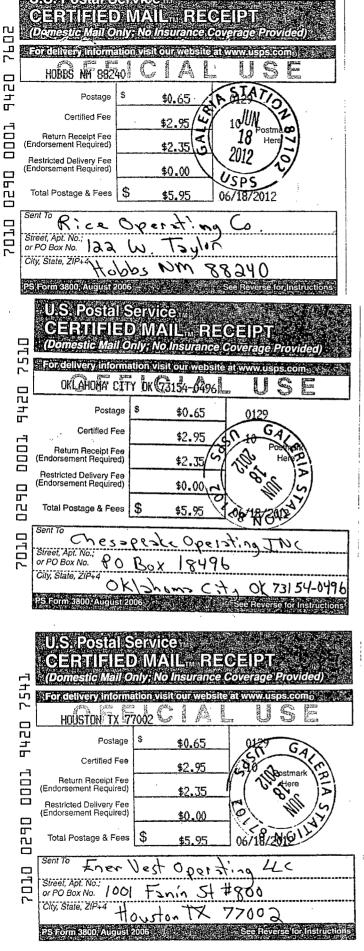
calculated pressure gradient; and IP_{max} is calculated maximum injection pressure.

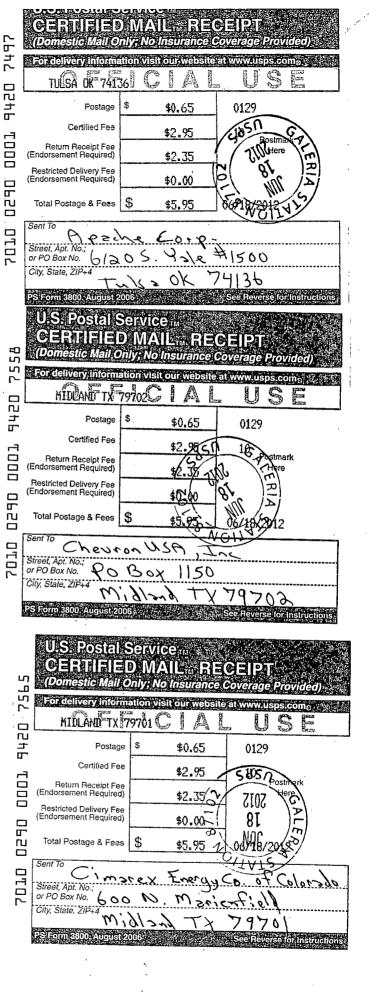
Monument AGI #1 C-103 Subsequent for SRT

APPENDIX A PLOT OF SRT RAW DATA

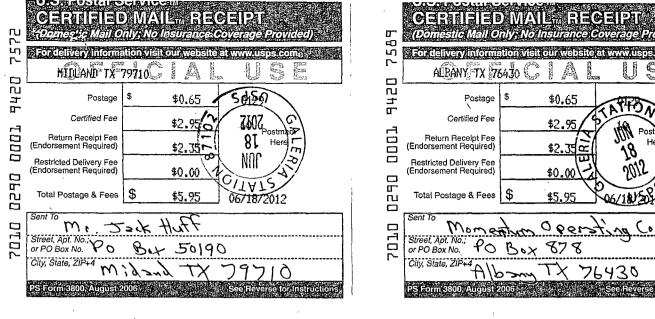


The plot shows the sequence of the step rate test (SRT) performed on June 08, 2012. The test was started with a distributed temperature sensor (DTS) run on a slick line. The test at the injection rate of 2 bpmwas going well, however, as the rate was increased to 7 bpm, the tension in the sensor line caused the bottom hole test measurements to be aborted. The test was performed successfully as planned by measuring surface data only.





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_____ ____ GALERIA POSTAL STORE ALBUQUERQUE, New Mexico 871029711 3401500129-0099 06/18/2012 (505)346-0854 02:37:26 PM = Sales Receipt == Product \ Sale Unit Final Description Qty Price Price TULSA OK 74136 \$0.65 Zone-5 First-Class Letter 1.50 oz. Expected Delivery: Thu 06/21/12 Return Rcpt (Green \$2.35 Card) Certified \$2.95 Labe] #: 70100290000194207497 ======== Issue PVI: \$5.95 OKLAHOMA CITY OK \$0.65 73154-0496 Zone-4 First-Class Letter 1.50 oz. _____ Issue PVI: \$0.65 OKLAHOMA CITY OK \$0.65 73154-0496 Zone-4 First-Class Letter 1.50 oz. Expected Delivery: Wed 06/20/12 Return Rcpt (Green \$2.35 Card) Certified \$2.95 Label #: 70100290000194207510 Customer Postage -\$0.65 Subtotal: \$5.30 ======== Issue PVI: \$5.30 HOUSTON TX 77002 \$0.65 Zone-5 First-Class Letter 1.50 oz. Expected Delivery: Thu 06/21/12 Return Rcpt (Green \$2.35 Card) Certified \$2.95 1 Label #: 70100290000194207541 ========= Issue PVI: \$5.95

MIDLAND IX 79702 \$0.65 Zone-4 First-Class letter 1.50 oz. Expected Delivery: Thu 06/21/12 Return Rcpt (Green \$2.35 Card) Certified \$2.95 Label #: 70100290000194207558 -----Issue PVI: \$5.95 MIDLAND TX 79701 \$0.65 Zone-4 First-Class Letter 1.50 oz. Expected Delivery: Thu 06/21/12 Return Rcpt (Green \$2.35 Card) Certified \$2.95 Label #: 70100290000194207565 ======= \$5.95 Issue PVI: MIDLAND TX 79710 \$0.65 Zone-4 First-Class Letter 1.50 oz. Expected Delivery: Thu 06/21/12 \$2.35 Return Rcpt (Green Card) Certified \$2.95 Label #: 70100290000194207572 ======= Issue PVI: \$5.95 ALBANY TX 76430 \$0.65 Zone-4 First-Class Letter 1.50 oz. Expected Delivery: Thu 06/21/12 Return Rcpt (Green \$2.35 Card) Certified \$2,95 70100290000194207589 Label #: =================== Issue PVI: \$5.95 HOBBS NM 88240 \$0.65 Zone-3 First-Class letter 1.40 oz. Expected Delivery: Wed 06/20/12 Return Rcpt (Green \$2.35 Card) Certified \$2.95 Label #: 70100290000194207602 ======= Issue PVI: \$5.95 MIDLAND TX 79705 \$0.65 Zone-4 First-Class Letter 1.50 oz. Expected Delivery: Thu 06/21/12 Return Rcpt (Green \$2.35 Card) Certified \$2.95 Label #: 70100290000194207619 ======= Issue PVI: \$5.95

Total:

\$53.55

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Paid by: VISA Account #: Approval #: Transaction #:

23902813401

\$53.55 XXXXXXXXXXX2999 19854G 774

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	so that we can return the card to you.	B. Received by (Printed Name) C. Date of Delivery
	or on the front if space permits.	D. Is delivery address different from item 1? Yes
1	1. Article Addressed to:	If YES, enter delivery address below:
	Apsine Corp.	
	Apzine Corp. 6120 5.721e #1500	
	Tubs ok 74136	3. Service Type
		Certified Mail Express Mail Registered Return Receipt for Merchandise Insured Mail C.O.D.
		4. Restricted Delivery? (Extra Fee)
	2. Article Number 7010 029 (Transfer from service label)	10 0001 9420 7497
	PS Form 3811, February 2004 Domestic Re	eturn Receipt 102595-02-M-154
	SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
	Complete items 1, 2, and 3. Also complete	A. Signature
	item 4 if Restricted Delivery is desired.Print your name and address on the reverse	X Atterist Addresse
	 so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	B. Received by (<i>Printed Name</i>) C. Date of Deliver
	1. Article Addressed to:	D. Is delivery address different from item 1? ☐ Yes If YES, enter delivery address below: ☐ No
	Chesapeake Operating, Inc. PO Box 18496	JUN OF
, ,	OKIshoms city OK	3 Service Typeu 20 5 Certified Mail □Atoress Mail
	73154-0496	Registered Refurn Receipt for Merchandis Insured Mail
		4. Restricted Delivery? (Extra Fee)
· · · · · · · · · · · · · · · · · · ·	2. Article Number (Transfer from service label) 7010	0290 0001 9420 7510
	PS Form 3811, February 2004 Domestic Re	eturn Receipt 102595-02-M-15
	$\int_{-\infty}^{\infty} \frac{1}{2\pi i \epsilon} \frac{1}{\epsilon} \frac{1}$	2
	SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
	Complete items 1, 2, and 3. Also complete	A. Signature
· .	item 4 if Restricted Delivery is desired. Print your name and address on the reverse	Addresse
	so that we can return the card to you. Attach this card to the back of the mailpiece,	B. Received by (Printed Name) C. Date of Deliver
· · · ·	or on the front if space permits. 1. Article Addressed to:	D. Is delivery address different from item 1? Ses
	Compress For now of Column.	
	Comprex Energy of Colorado 600 N. Marienfield	
	Milland TX 79701	
•		3. Service Type Certified Mail Registered Registered Return Receipt for Merchandis
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¢. *	 Complete items 1, 2, and 3. Also completitem 4 if Restricted Delivery is desired. Print your name and address on the revel 		A. Signature	Agent
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	 SENDER: COMPLETE THIS SECTION Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. Article Addressed to: Rice Spending Co. I a to the back of the standard to the second to the sec	COMPLETETHIS SECTION ON DELIVERY A. Signature □ Agent X □ Address B. Received by (Printed Name) C/Date of Delive Gentry Pearce D. Is delivery address different from item 1/2 Delive J. Service Type Service Type S. Service Type Service Type S. Service Type Registered □ Registered □ Return Receipt for Merchand □ Insured Mail □ C.O.D.	
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