

Bratcher, Mike, EMNRD

From: Randall Hicks <r@rthicksconsult.com>
Sent: Thursday, April 17, 2014 3:14 PM
To: Bratcher, Mike, EMNRD; THahn@yatespetroleum.com; MikeH@yatespetroleum.com; JimP@yatespetroleum.com
Cc: Dawson, Scott, EMNRD; VonGonten, Glenn, EMNRD; Sanchez, Daniel J., EMNRD; Dade, Randy, EMNRD
Subject: RE: Yates Dagger Draw Multi Well Fluid Management Pit (MWF2-1)

Mike

There are no more approved APDs as of this date. There are only the 21 recompletions and the 14 new wells that should be assigned to this permit.

Thanks

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From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]
Sent: Thursday, April 17, 2014 10:11 AM
To: THahn@yatespetroleum.com; MikeH@yatespetroleum.com; JimP@yatespetroleum.com; Randall Hicks
Cc: Dawson, Scott, EMNRD; VonGonten, Glenn, EMNRD; Sanchez, Daniel J., EMNRD; Dade, Randy, EMNRD
Subject: Yates Dagger Draw Multi Well Fluid Management Pit (MWF2-1)

Mr. Hahn,

OCD has been working with your contractor in an attempt to have a permit formulated for the proposed Dagger Draw MWFM Pit, that meets the requirements of the current pit rule. A variance was requested to allow wells that currently do not have approved APDs (with API numbers assigned) to be added after approval of the permit. That request cannot be approved as a variance and was informally denied as such. A formal denial will be sent as required by 19.15.17.15 A.(2). OCD was provided a list of well names for consideration of use with this pit, however, upon review of the list, it was determined that a majority of those (new drills) listed, do not currently have API numbers assigned.

The original permit lists 14 new drills and 21 recompletions. At this time, if Yates wants to add additional wells to the permit (prior to permit approval) please provide OCD a list of those wells, to include the API numbers assigned, along with a request to add those specific wells. If Yates wants to only include the 35 wells originally proposed in the permit, please advise so OCD may move forward with the review process.

If you have questions or concerns, please contact me. OCD very much looks forward to advancing the re-use of produced water in oil and gas operations in the state.

Thank you,

Mike Bratcher
NMOCD District 2

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