Michelle Lujan Grisham Governor

Sarah Cottrell Propst Cabinet Secretary Designate

Todd E. Leahy, JD, PhD Deputy Secretary **Gabriel Wade**, Acting Director Oil Conservation Division



Administrative Order SWD-1870 January 25, 2019

ADMINISTRATIVE ORDER OF THE OIL CONSERVATION DIVISION

Pursuant to the provisions of Division Rule 19.15.26.8(B) NMAC, Percussion Petroleum Operating, LLC (the "operator") seeks an administrative order for its Sleepy SWD Well No. 1 (the "subject well") with a location of 1980 feet from the North line and 1513 feet from the West line, Unit letter F of Section 31, Township 18 South, Range 26 East, NMPM, Eddy County, New Mexico, for the purpose of produced water disposal for the operator's lease wells.

THE DIVISION DIRECTOR FINDS THAT:

The application has been duly filed under the provisions of Division Rule 19.15.26.8(B) NMAC and satisfactory information has been provided that affected parties have been notified and two objections have been received within the prescribed waiting period, both protests to this application were withdrawn following negotiated resolutions. The applicant has presented satisfactory evidence that all requirements prescribed in Division Rule 19.15.26.8 NMAC have been met and the operator is in compliance with Division Rule 19.15.5.9 NMAC.

IT IS THEREFORE ORDERED THAT:

The applicant, Percussion Petroleum Operating, LLC (OGRID 371755), is hereby authorized to utilize its Sleepy SWD Well No. 1 (API 30-015-25996) with a location of 1980 feet from the North line and 1513 feet from the West line, Unit letter F of Section 31, Township 18 South, Range 26 East, NMPM, Eddy County, for disposal of oil field produced water (UIC Class II only) through open-hole completion into an interval consisting of the **Devonian formation** from approximately 9600 feet to approximately 10800 feet. Injection will occur through internally-coated, 3-½-inch or smaller tubing with a packer set within 100 feet of the top of the disposal interval.

This permit does not allow disposal into formations below the Silurian formations including the Montoya formation and the Ellenburger formation (lower Ordovician) or lost circulation intervals directly on top and obviously connected to these formations.

The sources for disposal in this well shall be limited to <u>only production from the operator</u> for produced water from the Yeso formation. Any request to include new sources of oil field produced water shall require written notice and approval by the Engineering Bureau in Santa Fe. This administrative permit prohibits the change from lease only for sources of disposal fluids only to commercial disposal well. If the applicant changes from a lease only injection well to a commercial well this order shall terminate ipso facto.

A change of operator for this administrative order shall be approved by the Director. A change in operator without the Director's consent shall terminate this injection authority ipso facto.

Due to the proximity to the Metropolis Disposal SWD No. 1 (API No. 30-015-31905; Division Order No. R-13371/Case No. 14601), an acid-gas disposal well in the same permitted interval, the following conditions of approval are required:

- 1. The operator shall circulate the cement for the 5½-inch production casing to surface. The operator shall run a cement bond log (CBL or equivalent) covering the 5½-inch production casing and shall supply the Division's District office with a copy of the log prior to commencing injection.
- 2. The cement for the 5¹/₂-inch production casing shall be sulfate-resistant cement (such as CorrosaCemTM cement or equivalent) for that portion of the casing below the DV stage tool located at approximately 5800 feet.
- 3. The operator shall install and maintain a SCADA system for the operation of the well and shall incorporate a detection system for hydrogen sulfide at the wellhead.
- 4. At such time the well is to be abandoned, the operator shall utilize materials for the deepest plug that are acid resistant.

The operator shall conduct a swab test of the new perforations for hydrocarbon potential analysis of hydrocarbon content. The Division's District office shall be noticed prior to this test and given the opportunity to witness the swab test. The operator shall supply the Division's District office and Santa Fe Engineering Bureau a Sundry notice with the results of the swab test prior to commencing injection.

Prior to commencing disposal, the operator shall obtain a bottom-hole pressure measurement representative of the open-hole completion. This information shall be provided with the written notice of the date of commencement of disposal.

IT IS FURTHER ORDERED THAT:

The operator shall take all steps necessary to ensure that the disposed water enters only the approved disposal interval and is not permitted to escape to other formations or onto the surface.

After installing tubing, the casing-tubing annulus shall be loaded with an inert fluid and equipped with a pressure gauge or an approved leak detection device in order to determine leakage in the casing, tubing, or packer. The casing shall be pressure tested from the surface to the packer

setting depth to assure casing integrity.

The well shall pass an initial mechanical integrity test ("MIT") prior to initially commencing disposal and prior to resuming disposal each time the disposal packer is unseated. All MIT procedures and schedules shall follow the requirements in Division Rule 19.15.26.11(A) NMAC. The Division Director retains the right to require at any time wireline verification of completion and packer setting depths in this well.

Without limitation on the duties of the operator as provided in Division Rules 19.15.29 and 19.15.30 NMAC, or otherwise, the operator shall immediately notify the Division's District I office of any failure of the tubing, casing or packer in the well, or of any leakage or release of water, oil or gas from around any produced or plugged and abandoned well in the area, and shall take such measures as may be timely and necessary to correct such failure or leakage.

If the disposal well fails a MIT or if there is evidence that the mechanical integrity of said well is impacting correlative rights, the public health, any underground sources of fresh water, or the environment, the Division Director shall require the well to be shut-in within 24 hours of discovery and the operator shall redirect all disposal waters to another facility. The operator shall take the necessary actions to address the impacts resulting from the mechanical integrity issues in accordance with Division Rule 19.15.26.10 NMAC, and the well shall be tested pursuant to Rule 19.15.26.11 NMAC prior to returning to injection.

The wellhead injection pressure on the well shall be limited to **no more than 1920 psi.** 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.

The Director of the Division shall authorize an increase in tubing pressure upon proper showing at hearing before the Division.

The operator shall notify the supervisor of the Division's District II office of the date and time of the installation of disposal equipment and of any MIT so that the same may be inspected and witnessed. The operator shall provide written notice of the date of commencement of disposal to the Division's District I office. The operator shall submit monthly reports of the disposal operations that includes number of days of operation, injection volume, and injection pressure on Division Form C-115, in accordance with Division Rules 19.15.26.13 and 19.15.7.24 NMAC.

The injection authority granted under this order is not transferable except upon Division approval. The Division may require the operator to demonstrate mechanical integrity of any injection well that will be transferred prior to approving transfer of authority to inject.

The Division may revoke this injection order after notice and hearing if the operator is in violation of Rule 19.15.5.9 NMAC.

The disposal authority granted herein shall terminate one (1) year after the effective date of this Order if the operator has not commenced injection operations into the proposed well. One

Administrative Order SWD-1870 Percussion Petroleum Operating, LLC January 25, 2019 Page 4 of 4

year after the last date of reported disposal into this well, the Division shall consider the well abandoned, and the authority to dispose will terminate *ipso facto*. The Division, upon written request mailed by the operator prior to the termination date, may grant an extension thereof for good cause.

Compliance with this Order does not relieve the operator of the obligation to comply with other applicable federal, state or local laws or rules, or to exercise due care for the protection of fresh water, public health and safety and the environment.

Jurisdiction is retained by the Division for the entry of such further orders as may be necessary for the prevention of waste and/or protection of correlative rights or upon failure of the operator to conduct operations (1) to protect fresh or protectable waters or (2) consistent with the requirements in this order, whereupon the Division may, after notice and hearing, terminate the disposal authority granted herein.

Gabriel Wade Acting Director

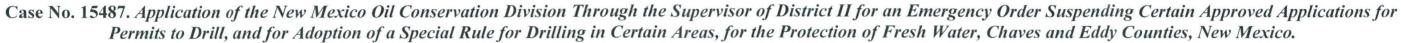
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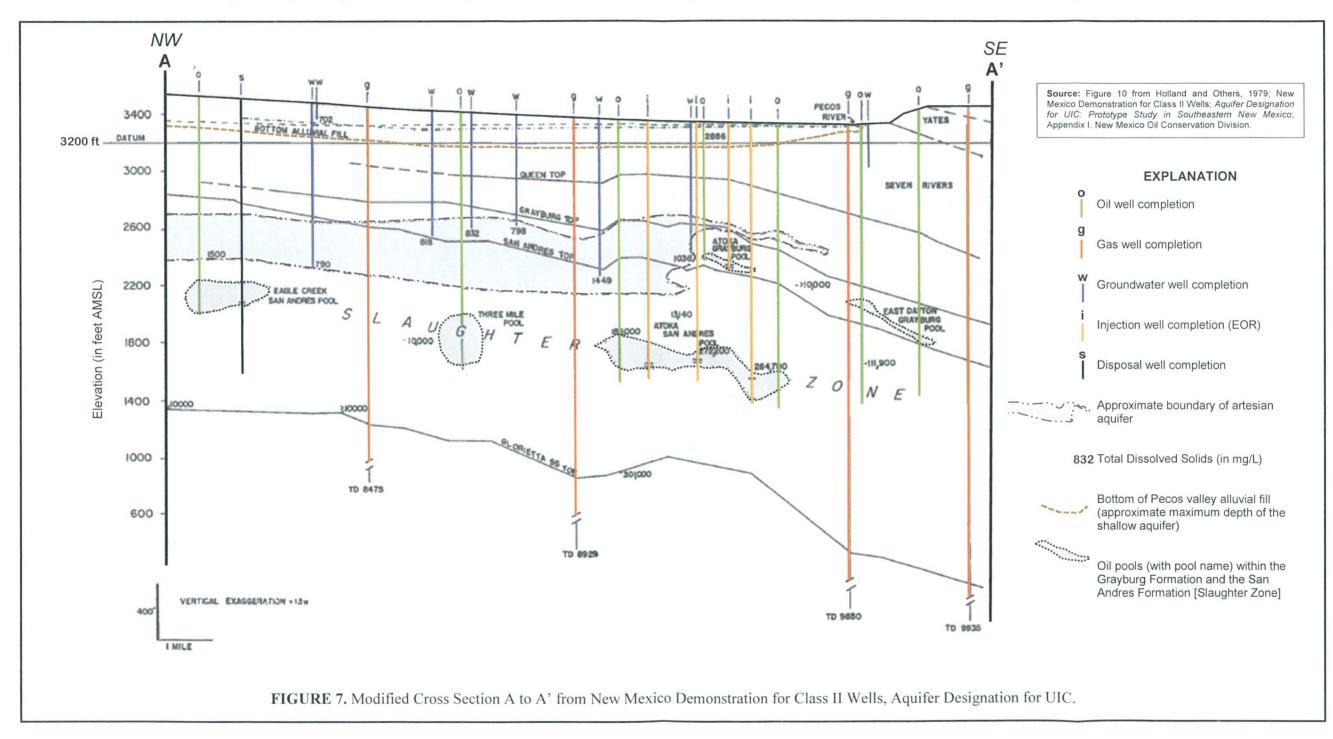
cc: Oil Conservation Division – Artesia District Office
New Mexico State Land Office – Oil, Gas and Minerals Division
Well file 30-015-25996

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C-108 Review	/ Checklist: R	received 7/24/2 US Add. Requ	est:	Reply Date:	Suspended: [Ver 15]							
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API: 30-0 15- 259	56 Spud Dat	te: 10-28-1544 N	New or Old:	M (UIC Class II	Primacy 03/07/1982)							
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Confining Unit: Litho. Struc. Por.	Struc. Por. M.S. 9200 NEW Open Hole Or NEW Perfs O											
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Proposed Inj Interval BOTTOM:					repth <u>9500</u> ft							
Confining Unit: Litho. Struc. Por.					950 (100-ft limit)							
Adjacent Unit: Litho. Struc. Por.		At			face Press. <u>1920</u> psi							
		formation Artesia	LLEA FIL	Admin. Inj. Press	197-00 (0.2 psi per ft)							
POTASH: R-111-P_MH Noticed?	BLM Sec Or	d WIPP () Noticed?	Salt/Sa	lado T:B:	<u>NW</u> : Cliff House fm							
FRESH WATER: Aquifer 94		Max Depth / 9	HYDR	O AFFIRM STATEME	ENT By Qualified Person							
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Disposal Fluid: Formation Source(s) (7/0n/	y e SU Analysis	?	On Lease O Operat	tor Only () or Commercial ()							
Disposal Int: Inject Rate (Avg/Max	BWPD): 54/3	SC Protectable Water	rs?S	ource:	System: Closed or Open							
HC Potential: Producing Interval				4								
AOR Wells: 1/2-M Radius Map?	Well List?	Total No. Wells P	enetrating li	nterval:	Horizontals?							
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Oil Conservation Division Energy, Minerals and Natural Resources Department State of New Mexico

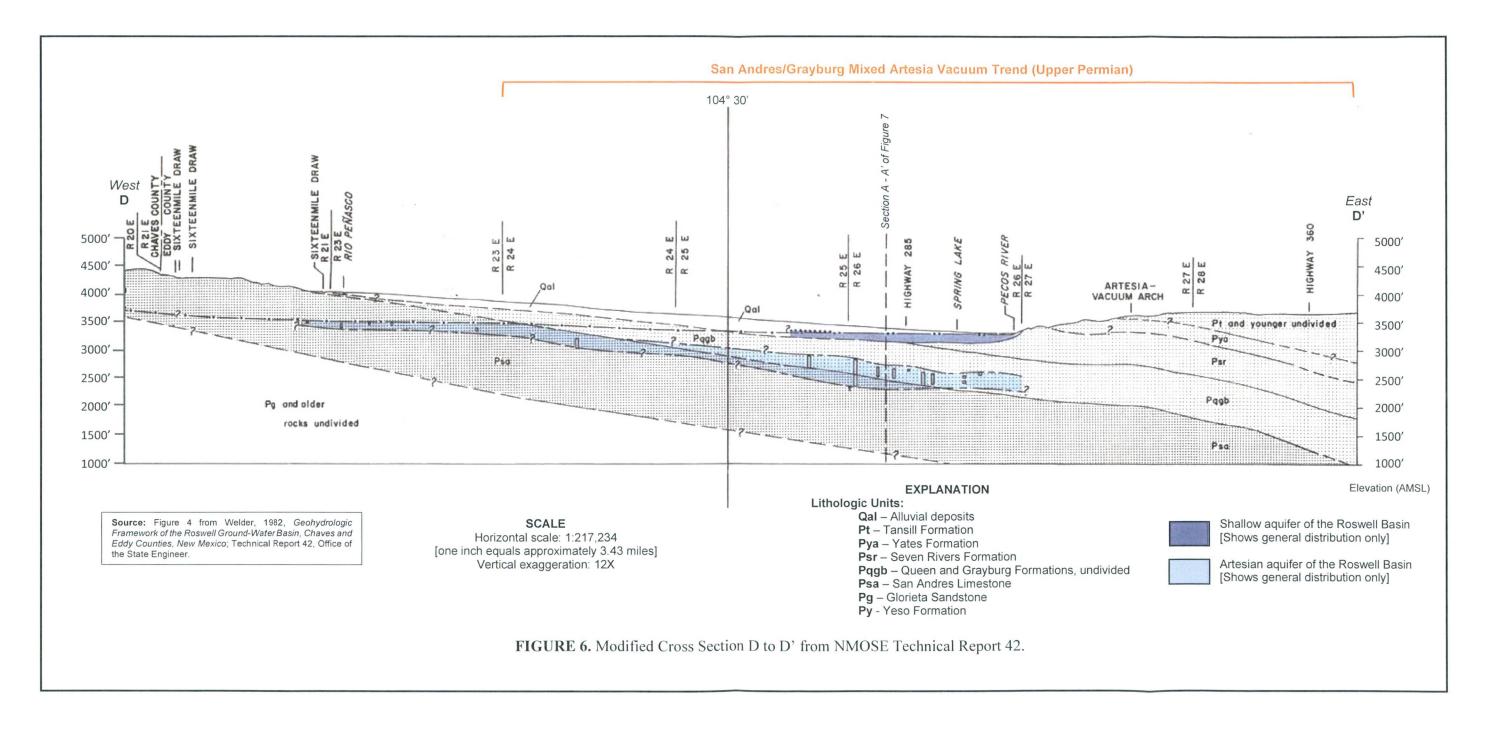






Oil Conservation Division Energy, Minerals and Natural Resources Department State of New Mexico







2018 Inventory of UIC Class II Acid Gas Injection (AGI) Wells

AGI Wells as of 09/27/2018	API	Well Name	Current Operator	Legal (UL-Sec-Twp- Rge)	Footages	Permit Description	Injection Formation(s)	Open-hole or Perforations (Depth of interval; in ft)	Re-entry of Existing Well or New Well	Permitted Disposal Fluids	2017 C-115 Reported Fluids	MSIP / Rate Limitations	Schedule for IMIT	Date of Current MIT	H ₂ S (Or Other Gas) - CO ₂ Content	Admin Order (If applicable)	Hearing Order	Case No.	Effective Order Date (Admin or Haering)	Associated Processing Facility	H ₂ S Contingency Plan For AGI Well (Date)	Notes
NA	30-039-22756	Sims Fed No. 1	Jicarilla Energy Company	J-13-30N-4W	1730' FSL & 1820' FEL	SWD only; amended to include acid gas	Morrison and Entrada	Perfs: 8600 to 9570	Re-entry	Produced water only	Only liquid reported	1720 psi	5-year MIT cycle	8/17/2017	NA	<u>SWD-665-C</u>	None	NA	3/9/2007	East Blanco Water / H ₂ S Disposal Facility		Acid gas injection authority approved under SWD-665-A (03/08/1998; 100 MSCFPD of 0.22% H ₂ S gas); rescinded 10/09/2007 under Administrative Order SWD-665-C.
NA	30-015-00037	Indian Basin Gas Com No. 1	OXY USA WTP Limited Partnership	E-23-21S-23E	1980' FNL & 660' FWL	Acid gas plus onsite waste water	Devonian	P&A open-hole: 10,100 to 10,400	Re-entry	Produced water and gas plant waste	No injection; producing gas well (Morrow)	2020 psi (1991)	NA	NA	NA	<u>SWD-416-A</u>	None	NA	4/12/2000	Indian Basin Gas Processing Plant	Not required	Wolfcamp perfs squeezed for period when well was injection; last injection reported January 24, 2001; 2001 recompleted as Morrow producer; Devonian open hole was plug backed with cement to 9792 ft. SWD-416-A expired <i>ipso facto</i> .
1	30-015-31294	AGI SWD No. 1	OXY USA WTP Limited Partnership	E-23-21S-23E	2139' FNL & 1061' FWL	Acid gas plus onsite waste water	Devonian	Open-hole: 10,350 to 11,000	New well	Produced water and gas plant waste	Only liquid reported	2070 psi; no differentiation for liquid vs. gas	5-year MIT cycle	10/9/2014	50% - 50%	<u>SWD-784-0</u>	NA	NA	8/17/2000	Indian Basin Gas Processing Plant	Not required under current operating conditions.	Replacement well for Indian Basin Com Well No. 1; no record of inclusion in H_2S plan; no gas injection reported.
2	30-025-21497	Eunice Gas Plant SWD No. 1	Targa Midstream Services	L-27-22S-37E	2580' FSL & 1200' FWL	Acid gas and wastewater	San Andres	Open-hole: 4,250 to 4,950	Conversion of existing well	Gas plant waste	Gas and liquid	1600 psi (see R-12809-D)	5-year MIT cycle (see R-12809-C)	8/2/2017	85% SO ₂ - 15%	SWD-1161-0	<u>R-12809-D</u>	13865 and 14575	3/27/2012	Eunice Gas Plant	H2S-048-0 (Revised 2011)	Originally approved as new well under Order No. R-12809 (Case No. 13865); SWD order allowed for substitution of proposed well with existing well; gas disposal reporting initiated in 2011.
NA	30-025-39254	Versado AGI No. 1L	Targa Midstream Services	L-27-22S-37E	2251' FSL & 1201' FWL	Acid gas and production water	San Andres	Perfs: 4500 to 5000	New well	Gas and liquid plant waste	NA	900 psi [limited by bottom-hole pressure]	MIT every 2 years	NA	85% SO ₂ - 15%	NA	<u>R-12809</u>	13865	9/14/2007	Eunice Gas Processing Plant	NA	Well was cancelled in 2010 (injection authority) and 2011 (federal APD); re-completed Eunice Gas Plant Well No. 1 as substitution.
3	30-015-32324	Duke AGI No. 1	DCP Operating Company	O-7-18S-28E	1232' FSL & 1927' FEL	Treated acid gas	Devonian	Perfs: 11,200 to 11,500	New well	Acid gas	Gas only	Gas (with SpG of 0.8): 3240 psi Water: 2240 psi	5-year MIT cycle <u>with</u> mandatory monthly reports of well parameters	7/17/2018	35% - 63%	<u>SWD-838-B</u>	None	NA	11/5/2002	Artesia Gas Plant	H2S-051-0 (Feb 2015)	Pressures reported are below Maximum Surface Injection Pressure (MSIP) for gas; annual MIT requirement on page 2, Ordering Paragraph (3), SWD-838-B.
4	30-015-31905	Metropolis Disposal No. 1	Agave Energy	K-36-18S-25E	1650' FSL & 1650' FWL	Treated acid gas	Devonian, Fusselman, and Montoya	Open-hole: 9,930 to 10,500	Re-entry	Acid gas	Gas only	3280 psi	MIT every 2 years	12/7/2016	61% - 38%	<u>SWD-936-0</u>	<u>R-13371</u>	14601	3/14/2011	Dagger Draw Gas Plant	H2S-054-0 (June 2012)	Pressures reported are below MSIP.
5	30-025-40448	Red Hills AGI No. 1	Lucid Energy Delaware, LLC	I-13-24S-33E	1600' FSL & 150' FEL	Treated acid gas	Cherry Canyon	Perfs: 6,230 to 6,585	New well	Acid gas	Gas only	2085 psi; not to exceed 13 MMSCFD	MIT every 2 years	1/12/2018	5% - 95%	NA	<u>R-13507-F</u>	14720	11/9/2017	Red Hills Gas Plant	H2S-064-0 (April 2018)	Order No. R-13507 has original design specification; well changed ownership; previously drilled but not perforated until recently (well was TA for a period without final perforations); amended order required to re-instate injection authority approved by Commission; commenced injection May 2018.
6	30-045-35172	Pathfinder AGI No. 1	CCI San Juan	F-1 -29N-15W	1650' FNL & 2260' FWL	Treated acid gas	Entrada	Open-hole: 6,350 to 6,490	New well	Gas byproducts	Gas only	2160 psi	MIT every 2 years	1/4/2018	20% - 78%	NA	<u>R-13201-B</u>	14329 and 14080	2/15/2011	San Juan River Gas Processing Plant	H2S-057-0 (October 2009)	Administrative Order IPI-387 increases MSIP to 2160 psi.
7	30-025-40420	Maljamar AGI No. 1	Frontier Field Services	0-21-17S-32E	130' FSL & 1813' FEL	Treated acid gas	Lower Leonard and Wolfcamp	Perfs: 9,579 to 10,130	New well	Gas processing waste	Gas only	3200 psi; not to exceed 3.5 MMSCFD	Annual MIT	8/4/2017	12% - 88%	NA	<u>R-13443-A</u>	14664 and 15193	8/11/2011	Maljamar Gas Processing Plant	H2S-044-0 (Revised Oct 2015)	Order No. R-13443 has original design specification; Order No. R- 13443-C permits a 3.5 MMSCFD into both wells or for a single operating well; Administrative Order IPI-454 increases MSIP to 3200 psi.
8	30-025-42628	Maljamar AGI No. 2	Frontier Field Services	0-21-17S-32E	400' FSL & 2100' FEL	Treated acid gas	Lower Leonard and Wolfcamp	Perfs: 9,600 to 10,220	New well	Gas processing waste	Gas only	3200 psi; not to exceed 3.5 MMSCFD	Annual MIT	8/4/2107	12% - 88%	NA	<u>R-13443-B</u>	15193	11/19/2014	Maljamar Gas Processing Plant	H2S-044-0 (Revised Oct 2015)	Order No. R-13443-C permits a 3.5 MMSCFD into both wells or for a single operating well; Administrative Order IPI-506 increases MSIP to 3200 psi.
9	30-025-38576	Linam AGI No. 1	DCP Operating Company	K-30-18S-37E	1980' FSL & 1980' FWL	Treated acid gas	Lower Bone Springs (Wolfcamp)	Perfs: 8,710 to 9,085	New well	Gas processing waste	Gas only	Gas (with SpG of 0.8): 2644 psi	MIT every <u>6 months</u> <u>until new packer</u> installed, then annual testing (Ordering Paragraph (Z) amended <u>order R-12546-K)</u>	6/7/2017	25% - 75%	NA	<u>R-12546-K</u>	13589	5/6/2006	Linam Ranch Gas Processing Plant	H2S-043-0 (Revised Jan 2015)	Commission Orders R-12546 with amended orders -A though -K cover both AGI wells; No. 1 well developed leaking tube set (faile MIT) requiring additional hearings on restricted operation and additional monitoring / reporting requirements that are now SOP for AGI wells; R-12546-I removed temporary rate and pressure limits.
10	30-025-42139	Linam AGI No. 2	DCP Operating Company	K-30-18S-37E	1600' FSL & 1750' FWL	Treated acid gas	Lower Bone Springs (Wolfcamp)	Perfs: 8765 to 9006	New well	Gas processing waste	Gas only	Gas (with SpG of 0.8): 2644 psi	Annual MIT	2/16/2017	25% - 75%	NA	<u>R-12546-K</u>	13589	2/14/2013	Linam Ranch Gas Processing Plant	H2S-043-0 (Revised Jan 2015)	Commission Orders R-12546 with amended orders -A though -K cover both AGI wells.
11	30-025-38822	Jal 3 AGI No. 1	ETC Field Services	E-33-24S-37E	1550' FNL & 1000' FWL	Acid gas and production water	San Andres	Perfs: 4375 to 5200	New well	Gas and liquid plant waste	Liquid only	986 psi for original mixed liquid and gas injection; temporary 1330 psi gas only (ending 12/01/2015)	MIT every 2 years	7/27/2017	20% - 78%	NA	<u>R-12921</u>	14080	3/21/2008	South Eunice Gas Processing Plant	H2S-045-0 (2008)	Temporary MSIP increase approved and ended 12/1/2015; C-11: reports show all produced water with no gas injection and pressures below MSIP of 986 psi.
12	30-025-42208	Zia AGI No. 1	DCP Operating Company	Lot 3 (L)-19-195 32E	2100' FSL & 950' FWL	Treated acid gas	Cherry Canyon and Brushy Canyon	Perfs: 5682 to 6260	New well	Gas processing waste	Gas only	2233 psi	MIT annually	[7/26/2017]*	11% - 89%	NA	<u>R-13809</u>	15073	3/13/2014	Zia II Gas Processing Plant	H2S-063-0 (Revised 2016)	Order No. R-13809-A approved new surface and bottom-hole locations for both wells. *Redundant back-up well to Zia D No. 2 requires order modification before Commission.
	00.005 (0007	Zia AGI No. 2	DCP Operating Company	Lot 3 (L)-19-195 32E	1900' FSL & 950' FWL	Treated acid gas	Cherry Canyon and Brushy Canyon	Approved for 5470 to 6070	New well	Gas processing waste	NA	2233 psi	MIT annually	NA	11% - 89%	NA	<u>R-13809</u>	15073	3/13/2014	Zia II Gas Processing Plant	NA	Order No. R-13809-A approved new surface and bottom-hole locations for both wells.
13	30-025-42207	Zia AGI D No. 2	DCP Operating Company	Lot 3 (L)-19-195 32E	1893' FNL & 950' FWL	Treated acid gas	Devonian and Silurian	Open-hole: 13755 to 14750	New well	Gas processing waste	Gas only	5028 psi	MIT annually	1/25/2018	11% - 89%	NA	<u>R-14207</u>	15528	9/6/2016	Zia II Gas Processing Plant	H2S-063-0 (Revised 2016)	Operator modified injection interval to Devonian section through Commission hearing and used existing APD approval for deeper well; the original Zia AGI No. 2 well never spud.
NA	30-025-40002	Monument AGI No. 1	Targa Midstream Services	0-36-19S-36E	662' FSL & 2513' FEL	Acid gas plus onsite waste water	Devonian and Fusselman	Open-hole: 8,350 to 9,200 (TD)	New well	Production water plus gas	P&A'd on 10/11/2017	1660 psi	MIT every 2 years	NA	28% - 62%	NA	R-13052	14161	11/16/2006	Monument Gas Plant	H2S-046-0 (2012)	Well is plugged and abandoned; replaced by two new AGI wells.
14	30-025-43470	Monument AGI D No. 2	Targa Midstream Services	0-36-19S-36E	685' FSL & 2362' FEL	Treated acid gas	Devonian and Silurian	Open-hole: 8350 to 9210	New well	Gas processing waste	Gas only	3000 psi; not to exceed 5.0 MMSCFPD	MIT annually	1/13/2018	18% - 82%	<u>SWD-1654-0</u>	<u>R-13052-B</u>	15740	9/6/2016	Monument Gas Processing Plant	Amendment of 2012 plan pending	Replacement well approved through administrative order using content of Commission Order No. R-13052 (as amended) as template.
15	30-025-Pending	Monument AGI D No. 3	Targa Midstream Services	0-36-19S-36E	905' FSL & 2362' FEL	Treated acid gas	Devonian and Silurian	Open-hole: 8350 to 9210	New well	Gas processing waste	Gas only	3000 psi; not to exceed 5.0 MMSCFPD	MIT annually	NA	18% - 82%	<u>SWD-1671-0</u>	<u>R-13052-B</u>	15740	4/24/2017	Monument Gas Processing Plant	Amendment of 2012 plan pending	Redundant well to D No. 2; no approved APD at present; replacement well approved through administrative order using content of Commission Order No. R-13052 (as amended) as template.

Approved authority for AGI but well not completed