

From: [Engineer, OCD, EMNRD](#)
To: [Sarah Mitchell](#)
Cc: [Patrick Padilla](#); [Davis Lunsford](#); [Goetze, Phillip, EMNRD](#); [Ames, Eric, EMNRD](#); [Rose-Coss, Dylan H, EMNRD](#); [Engineer, OCD, EMNRD](#); [Bratcher, Mike, EMNRD](#)
Subject: RE: NMOCD Order No R-21061// Case No. 20965//Gas Capture Pilot Project- EOG Resources, Inc.
Date: Wednesday, April 29, 2020 5:38:27 PM
Attachments: [image001.png](#)

Hello Ms. Mitchell,

I believe we are on the same page after our phone conversation last week, and I am sending this email merely as a follow up.

The fluid level test requirement in paragraph 11 of Order R-21061 needs to be conducted during the pilot project following an injection test with a relatively high flow rate, pressure, and volume. The intent is to determine if the fluid level in wells without packers can rise following injection into the reservoir. An adequate test of this during the pilot project may lessen concerns leading to being overly conservative when drafting potential rules governing these projects to be adopted in the future.

Additionally, the OCD is in agreement the requirements in the last sentence of paragraph 11, "At least ten (10) business days prior to conducting the test, EOG shall submit the proposed test conditions and protocol for OCD's approval" only applies if EOG proposes test conditions which do not conform with what is provided in the rest of paragraph 11.

Please feel free to reach out with any questions you may have. I can be reached at (307)660-4998 while teleworking or via email.

Dean McClure
Petroleum Specialist A, Oil Conservation Division
New Mexico Energy, Minerals and Natural Resources Department
(505) 476-3471

From: Sarah Mitchell <Sarah_Mitchell@eogresources.com>
Sent: Tuesday, April 21, 2020 9:52 PM
To: Engineer, OCD, EMNRD <OCD.Engineer@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Patrick Padilla <Patrick_Padilla@eogresources.com>; Davis Lunsford <Davis_Lunsford@eogresources.com>
Subject: [EXT] NMOCD Order No R-21061// Case No. 20965//Gas Capture Pilot Project- EOG Resources, Inc.

Good evening Mr. Bratcher and the NMOCD Engineering Bureau,

Pursuant to Paragraph 12 of NMOCD Order No. R-21061, EOG Resources, Inc. hereby provides 48 hour written notice of its intent to commence injection of produced gas into the Caballo 23 Federal

2H (30-025-40051), located in C-23-25S-R33E, Lea County, New Mexico.

In accordance with Paragraphs 11 and 12 of this Order, attached please find:

1. The results of the fluid column test conducted on the Caballo 23 Federal 2H on April 15, 2020
2. Plans specifying the procedures to address any environmental or engineering emergency during the project

Please let me know if I can provide any further information.

Best regards,
Sarah

Sarah Mitchell | Regulatory
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