State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

John Bemis Cabinet Secretary

Brett F. Woods, Ph.D. Deputy Cabinet Secretary Jami Bailey
Division Director
Oil Conservation Division



July 9, 2012

Paul Marken
Completion Supervisor
Referred to Dollie Busse
ConocoPhillips Company
San Juan Business Unit

Phone: (505) 326-9837

Email: Dollie.L.Busse@conocophillips.com

Dear Ms. Busse,

The Oil Conservation Division ("Division") is in receipt of your request to beneficially use produced water to fracture treat the Stewart LS #8N API # 30-045-35330, UL-F, Sec 28, Twn 30N, R10W. In granting this beneficial use the Division agrees and requires that:

- 1. The aquifer is an exempted aquifer because it does not currently serve as a source of drinking water, and that cannot now and will not in the foreseeable future serve as a source of drinking water because it is hydrocarbon producing. 19.15.2.7.E.5 NMAC
- 2. One of the water samples from the producing wells adjacent to Stewart LS #8N have atypically low TDS for the San Juan Basin.
- 3. The produced water ConocoPhillips proposes to use for well stimulation averages less than 14,500 ppm TDS.
- 4. The produced water ConocoPhillips proposes to use in its pilot test is less than the TDS of the fluid used in a standard conventional well stimulation.
- 5. Notification is required to be given to the district office 24-72hrs prior to the commencement of hauling the produced water and shall include a schedule with beginning and ending dates.
- 6. All trucks hauling produced water to the location must have a copy of their approved C-133 and a copy of this letter in the truck.
- 7. This letter is to be in the trucks authorized to haul the produced water only for the time period supplied in the required notification.
- 8. Conoco is only authorized to haul water from downstream of the Vasely SWD #2 (API # 30-045-29936) second stage filtration system, which can be loaded into the trucks at the Vasely SWD #2 facility or the Mar Vista SWD #1 (API # 30-045-35126) facility.

- 9. Conoco is required to keep a log of the loads of produced water taken to the location and have it available upon request.
- 10. This approval will expire on July 31st, 2012

If you have any further questions, please feel free to contact Brandon Powell at Brandon.Powell@state.nm.us or 505-334-6178 xt 116.

Sincerely,

Charlie Perrin

Aztec District Manager 1000 Rio Brazos Road

Aztec, NM 87410



RCVD JUL 2'12 DIL CONS. DIV. DIST. 3

San Juan

Request for Alternative Use of Produced Water

Stewart LS #8N

API # 3004535330 T30N R10W Sec 28 Unit F

June 29, 2012

Submitted by:

Paul Marken Completion Supervisor

Kyle Hampton Completion Engineer

Please reply to: Dollie Busse at (505) 324-6104

Or: Dollie.L.Busse@conocophillips.com

Request for Alternative Use of Produced Water

1. COPC wishes to use 100% produced water as a base fluid for our

stimulation of the Stewart LS #8N. Plans are to use only this water to

stimulate the Dakota, Mancos and Mesa Verde zones. The stimulation job

will be completed no later than August 15, 2012. The legal description for

the Stewart LS #8N is as follows:

Location: 36° 47' 11.062"N 107° 53' 31.56" W: T30N R10W Sec 28 Unit F

API: 3004535330

2. The source of the produced water for this alternative use pilot test will

be the Vasaly SWD #2. The water will be taken downstream from the

second stage filtration, just upstream from the injection wellhead. This

treated and filtered water will be transferred by pipeline to two 500 Bbl

holding tanks located on the Mar Vista SWD #1 site. Vacuum trucks will

then haul this water to the Horton #1B. This will be a mixture of produced

water from Dakota, Mesa Verde, Pictured Cliffs and Fruitland formations.

Historic water sample from the Vasaly SWD #2 have averaged less than

14,500 ppm TDS. Our standard stimulation fluid, 2% KCI, averages over

21,000 ppm TDS. Analysis of water from Vasaly SWD #2 sampled on 23

May 2012 is attached as Appendix A. The Vasaly SWD #2 is 100% owned by

ConocoPhillips.

- 3. We do not anticipate any compatibility issues using water from Vasaly SWD #2 to fracture stimulate Stewart LS #8N. The bulk of the water transported to Vasaly SWD #2 originates from the same formations we will be stimulating. API analyses of water from Vasaly SWD #2 indicate negligible scaling tendencies. Water samples from the Bruington GC #1E, Bruington LS #4P, and Marx Fed #1M, which are near Stewart LS #4P and are completed in some of the same target formations (Dk, MV) as Stewart LS #4P, were analyzed for compatibility with the Vasaly SWD #2 water sample. The analysis was performed at three different mix ratios (25% / 75%, 50% / 50%, 75% / 25%). This analysis indicates negligible scaling tendencies at all mix ratios. These water sample analyses are available upon request.
- 4. A list of the wells disposing of water at the Vasaly SWD #2 is available upon request.
- 5. We anticipate that we will use approximately 10,700 bbls of water to stimulate this well.
- 6. We will be storing the produced water on location in thirty (30) 400 bbl frac tanks.
- 7. All fluids flowed back after the stimulation will be contained in a flowback tank then transported to an approved disposal facility.

APPENDIX A

Water Analysis Vasaly SWD #2

Baker Hughes

Production Water Analysis for

ConocoPhillips FARMINGTON, Vasaly SWD #2, Drilling

Representative: Sheperd, Dave

| vampio bater 00/ 10/ 1011 | | |
|---------------------------|-------|------|
| Specific Gravity: | 1.011 | |
| TDS: | 14876 | |
| pH: | 7.47 | |
| Cations | mg/L | as: |
| Calcium: | 87.03 | Ca |
| Magnesium: | 0 | Mg |
| Sodium: | 4279 | Na |
| Iron: | 25.97 | Fe |
| Barium: | 3.41 | Ва |
| Strontium: | 14.44 | Sr |
| Manganese: | 0 | Mn |
| Anions | mg/L | as: |
| Bicarbonate: | 1159 | HCO3 |
| Carbonate: | 0 | CO3 |
| Sulfate: | 750 | SO4 |
| Chloride: | 8500 | Cl |
| Gases: | mg/L | as: |
| Carbon Dioxide: | 250 | CO2 |
| Hydrogen Sulfide: | 17 | H2S |
| Lah Comments: | | |

Lab Comments: Sales Comments:

DownHole SAT Scale

| Prediction: | 70 | |
|----------------------|------------|----------------------------------|
| | Saturation | |
| Mineral Scale | Index | Momentary Excess (lbs/1000 bbls) |
| Calcite (CaCO3) | 1.8 | 2.45 |
| Strontianite (SrCO3) | 1.27 | 1.36 |
| Anhydrite (CaSO4) | 0.02 | -2759 |
| Gypsum (CaSO4*2H2O) | 0.04 | -2260.45 |
| Barite (BaSO4) | 77.71 | 5.72 |
| Celestite (SrSO4) | 0.17 | -134.82 |
| Siderite (FeCO3) | 959.88 | 6.49 |
| Halite (NaCl) | . 0 | -491601.19 |
| Iron sulfide (FeS) | 1746.14 | 11.17 |

APPENDIX B

Water Analysis from adjacent producing wells: Bruington GC #1E

Baker Hughes

Production Water Analysis for

ConocoPhillips FARMINGTON, Bruington Gas C #1E, Drilling

| Representative: | Sheperd, | Dave |
|-----------------|----------|------|
|-----------------|----------|------|

| Representative. Shepera, Dave | | |
|-------------------------------|--------|-------------------------|
| Sample Date: 01/23/2012 | | Lab Test No: 2012102313 |
| Specific Gravity: | 1.019 | |
| TDS: | 26896 | |
| pH: | 6.44 | |
| Cations | mg/L | as: |
| Calcium: | 216.14 | Ca |
| Magnesium: | 44.2 | Mg |
| Sodium: | 9168 | Na |
| Iron: | 86.12 | Fe |
| Barium: | 42.91 | Ва |
| Strontium: | 35.28 | Sr |
| Manganese: | 0 | Mn |
| Anions | mg/l | as: |

Anions mg/L as: 488 HCO3 Bicarbonate: CO3 Carbonate: 0 Sulfate: 8 **SO4** Chloride: 16700 Cl Gases: as:

Gases:mg/Las:Carbon Dioxide:100CO2Hydrogen Sulfide:0H2S

Lab Comments: Sales Comments:

DownHole SAT Scale

| Prediction: | 180 Saturation | <i>;</i> |
|----------------------|-------------------|----------------------------------|
| Mineral Scale | Index | Momentary Excess (lbs/1000 bbls) |
| Calcite (CaCO3) | 0.65 | -0.3 |
| Strontianite (SrCO3) | 0.08 | -8.49 |
| Anhydrite (CaSO4) | 0 | -1862.68 |
| Gypsum (CaSO4*2H2O) | 0 | -2356.99 |
| Barite (BaSO4) | 0.69 | -5.03 |
| Celestite (SrSO4) | 0 | -548.56 |
| Siderite (FeCO3) | 861.8 | 0.65 |
| Halite (NaCl) | 0 | -604999.69 |
| Iron sulfide (FeS) | 0 | -0.09 |

APPENDIX B

Water Analysis from adjacent producing wells: Bruington LS #4P

Baker Hughes

Production Water Analysis for

ConocoPhillips FARMINGTON, Bruington LS #4 P, Drilling

Representative: Sheperd, Dave

| Representative: Sneperd, Dave | | |
|-------------------------------|--------|-------------------------|
| Sample Date: 01/24/2012 | | Lab Test No: 2012102316 |
| Specific Gravity: | 1.007 | |
| TDS: | 8590 | |
| pH: | 6.59 | |
| Cations | mg/L | as: |
| Calcium: | 133.23 | Ca |
| Magnesium: | 10.94 | Mg |
| Sodium: | 2825 | Na |
| Iron: | 39.52 | Fe |
| Barium: | 9.35 | Ва |
| Strontium: | 21.71 | Sr |
| Manganese: | 1.48 | Mn |
| Anions | mg/L | as: |
| Bicarbonate: | 244 | HCO3 |
| Carbonate: | 0 | CO3 |
| Sulfate: | 9 | SO4 |
| Chloride: | 5210 | Cl |
| Gases: | mg/L | as: |
| Carbon Dioxide: | 250 | CO2 |
| Hydrogen Sulfide: | 0 | H2S |
| Lab Comments: | | |
| Sales Comments: | | |
| | | |

DownHole SAT Scale

| Prediction: | 180 | |
|----------------------|------------|----------------------------------|
| | Saturation | |
| Mineral Scale | Index | Momentary Excess (lbs/1000 bbls) |
| Calcite (CaCO3) | 0.49 | -0.34 |
| Strontianite (SrCO3) | 0.07 | -5.96 |
| Anhydrite (CaSO4) | 0 | -1276.07 |
| Gypsum (CaSO4*2H2O) | 0 | -1593.14 |
| Barite (BaSO4) | 0.46 | -7.94 |
| Celestite (SrSO4) | 0 | -347.11 |
| Siderite (FeCO3) | 492.12 | 0.38 |
| Halite (NaCl) | 0 | -563188.69 |
| Iron sulfide (FeS) | 0 | -0.06 |

APPENDIX B

Water Analysis from adjacent producing wells: Marx Fed #1M

Baker Hughes

Production Water Analysis for

ConocoPhillips FARMINGTON, Marx Fed #1M, Drilling

Representative: Sheperd, Dave

| Representative: Sheperd, Dave | | |
|-------------------------------|--------|-------------------------|
| Sample Date: 01/23/2012 | | Lab Test No: 2012102314 |
| Specific Gravity: | 1.02 | |
| TDS: | 28826 | |
| pH: | 6.42 | |
| Cations | mg/L | as: |
| Calcium: | 299.4 | Ca |
| Magnesium: | 38.89 | Mg |
| Sodium: | 10018 | Na |
| Iron: | 106.64 | Fe |
| Barium: | 64.81 | Ва |
| Strontium: | 56.45 | Sr |
| Manganese: | 1.43 | Mn |
| Anions | mg/L | as: |
| Bicarbonate: | 366 | HCO3 |
| Carbonate: | 0 | CO3 |
| Sulfate: | 9 | SO4 |
| Chloride: | 17700 | Cl |
| Gases: | mg/L | as: |
| Carbon Dioxide: | 350 | CO2 |
| Hydrogen Sulfide: | 0 | H2S |
| Lab Comments: | | |

DownHole SAT Scale

Sales Comments:

| 00 bbls) |
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