# 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



October 1, 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 Hartman 23 #1P API # 30-045-35323, UL-K, Sec 23, Twn 30N, R11W. 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 Hartman 23 #1 has 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 October 30th, 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

#### Powell, Brandon, EMNRD

Subject:

FW: Produced Water Well Notification

From: Busse, Dollie L [mailto:Dollie.L.Busse@conocophillips.com]

Sent: Friday, September 28, 2012 6:19 AM

To: Powell, Brandon, EMNRD

**Subject:** Produced Water Well Notification

Going forward, to ensure that ConocoPhillips complies with the requirements to utilize produced water, ConocoPhillips will be the party notifying the OCD via email 24 hours prior to hauling water, rather than the trucking company. In addition, ConocoPhillips will provide mandatory training for all water hauling contractors on the produced water hauling process to make certain the proper notification is made and logs are available upon request.

Please let us know if you have any questions or need additional information.

Thank you,

Dollie L. Busse
ConocoPhillips Company-SJBU
Regulatory
Staff Regulatory Tech
505-324-6104
505-599-4062 (fax)
Dollie.L.Busse@conocophillips.com

"We can judge the heart of a man by his treatment of animals." - Immanual Kant

In Response to failure to properly notify on the Calloway LS#2A



RCVD SEP 5'12 OIL CONS. DIV. DIST. 3

# San Juan

# Request for Alternative Use of Produced Water

Hartman 23 #1 P

API # 3004535323 T30N R11W Sec 23 Unit K 36° 47' 44.531"N 107° 57' 42.3" W

September 4, 2012

Submitted by:

Paul Marken Completion Supervisor

4 SEPTEMBER 2012

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 Hartman 23 #1P. Plans are to use only this water to stimulate the Dakota and Mesa Verde zones. The stimulation job will be completed no later than October 30, 2012.
- 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 Hartman 23 #1P. 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% KCl, averages over 21,000 ppm TDS. Analysis of water from Vasaly SWD #2 sampled on 21 August 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 Hartman 23 #1P. 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 Hartman 23 #1P and are completed in some of the same target formations (Dk, MV) as Hartman 23 #1P, 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 4,400 bbls of water to stimulate this well.
- 6. We will be storing the produced water on location in eleven (11) 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		
Sample Date: 08/21/2012		Lab Test No: 2012125753
Specific Gravity:	1.013	
TDS:	17770	
pH:	6.26	
Cations	mg/L	as:
Calcium:	131	Ca
Magnesium:	28	Mg
Sodium:	6091	Na
Iron:	6.57	Fe
Barium:	9.21	Ва
Strontium:	20	Sr
Manganese:	0.74	Mn
Anions	mg/L	as:
Bicarbonate:	1342	HCO3
Carbonate:	0	CO3
Sulfate:	650	SO4
Chloride:	9400	Cl
Gases:	mg/L	as:
Carbon Dioxide:	50	CO2
Hydrogen Sulfide:	17	H2S
Lab Comments:		

# **DownHole SAT Scale**

Sales Comments:

Prediction:	70	
	Saturation	
Mineral Scale	Index	Momentary Excess (lbs/1000 bbls)
Calcite (CaCO3)	0.19	-1.72
Strontianite (SrCO3)	0.12	-3.88
Anhydrite (CaSO4)	0.03	-2850.49
Gypsum (CaSO4*2H2O)	0.04	-2337.66
Barite (BaSO4)	165.99	15.56
Celestite (SrSO4)	0.18	-159.09
Siderite (FeCO3)	17.36	0.45
Halite (NaCl)	0	-494278.88
Iron sulfide (FeS)	6.8	2.18

#### **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	Re	preser	tative:	Shepe	rd, Dav	e
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Sample Date: 01/23/2012	Lab Test No: 2012102313

	Lab Test No: 2012102313
1.019	
26896	
6.44	
mg/L	as:
216.14	Ca
44.2	Mg
9168	Na
86.12	Fe
42.91	Ва
35.28	Sr
0	Mn
mg/L	as:
488	HCO3
0	CO3
8	SO4
16700	Cl
mg/L	as:
100	CO2
0	H2S
	26896 6.44 mg/L 216.14 44.2 9168 86.12 42.91 35.28 0 mg/L 488 0 8 16700 mg/L 100

Lab Comments: Sales Comments:

**DownHole SAT Scale** 

Prediction:	180
	C-44.

Saturation	
Index	Momentary Excess (lbs/1000 bbls)
0.65	-0.3
0.08	-8.49
0	-1862.68
0	-2356.99
0.69	-5.03
0	-548.56
861.8	0.65
0	-604999.69
0	-0.09
	0.65 0.08 0 0 0 0.69 0 861.8

# **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		
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: Sh	າeperd, Dave
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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
Lah Comments:		

Lab Comments: Sales Comments:

#### DownHole SAT Scale

Prediction:	180	
	Saturation	
Mineral Scale	Index	Momentary Excess (lbs/1000 bbls)
Calcite (CaCO3)	0.64	-0.23
Strontianite (SrCO3)	0.08	-5.96
Anhydrite (CaSO4)	0	-1785.68
Gypsum (CaSO4*2H2O)	0	-2274.33
Barite (BaSO4)	1.09	1.19
Celestite (SrSO4)	0	-541.45
Siderite (FeCO3)	721.4	0.46
Halite (NaCl)	0	-606178.38
Iron sulfide (FeS)	0	-0.08