

**From:** [Goetze, Phillip, EMNRD](#)  
**To:** [Harris, Anthony, EMNRD](#); [Gebremichael, Million, EMNRD](#)  
**Subject:** RE: Current Status: NOI for the Sand 18 Fed 1 SWD [Action ID: 248703]  
**Date:** Wednesday, September 13, 2023 11:14:28 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

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Thank you Tony. If Million returns, we should have a group discussion on Monday (or Tuesday) and render a final decision. PRG

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**From:** Harris, Anthony, EMNRD <Anthony.Harris@emnrd.nm.gov>  
**Sent:** Wednesday, September 13, 2023 10:51 AM  
**To:** Goetze, Phillip, EMNRD <phillip.goetze@emnrd.nm.gov>; Gebremichael, Million, EMNRD <Million.Gebremichael@emnrd.nm.gov>  
**Subject:** RE: Current Status: NOI for the Sand 18 Fed 1 SWD [Action ID: 248703]

Good morning

A couple comments / observations:

1. After pulling the tubing, they plan to run a 4-5/8" bit and 5.5" casing scraper to OH PBTD at 18,000 ft (ie. Note 5.5" casing shoe is at 16,700 ft).
  - a. ID of 5.5" 20# casing is 4.778" with Drift ID = 4.653"
  - b. Assuming that run (ie. 4.625" bit) is completed successfully, running the 4" tubing should not pose any issues.

With respect to running 3.5" vs 4.0" tubing:

1. I'm assuming the recommended guideline to run 3.5" inside 5.5" was adopted based upon issues encountered in the past with overshot limitations?
  - a. That constraint should only arise if fishing was required to retrieve parted 4" pipe.
  - b. If we highlight that issue to Devon, and they are willing to accept that risk, I don't see a compelling reason not to run the 4".

Regards

Tony

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**From:** Goetze, Phillip, EMNRD <[phillip.goetze@emnrd.nm.gov](mailto:phillip.goetze@emnrd.nm.gov)>  
**Sent:** Tuesday, September 12, 2023 9:06 PM  
**To:** Gebremichael, Million, EMNRD <[Million.Gebremichael@emnrd.nm.gov](mailto:Million.Gebremichael@emnrd.nm.gov)>  
**Cc:** Harris, Anthony, EMNRD <[Anthony.Harris@emnrd.nm.gov](mailto:Anthony.Harris@emnrd.nm.gov)>  
**Subject:** FW: Current Status: NOI for the Sand 18 Fed 1 SWD [Action ID: 248703]

Updated the SWD order imaging to have a copy of the hearing order. You are correct that the hearing order has 3.5-inch. See attached guidance and comment when you have time. PRG

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**From:** Goetze, Phillip, EMNRD  
**Sent:** Tuesday, September 12, 2023 3:57 PM  
**To:** Gebremichael, Million, EMNRD <[Million.Gebremichael@emnrd.nm.gov](mailto:Million.Gebremichael@emnrd.nm.gov)>  
**Cc:** Harris, Anthony, EMNRD <[Anthony.Harris@emnrd.nm.gov](mailto:Anthony.Harris@emnrd.nm.gov)>  
**Subject:** FW: Current Status: NOI for the Sand 18 Fed 1 SWD [Action ID: 248703]

I will need to track down the UIC permit for this and make a chronology. SWD-2218 appears only to be an application but the image file shows an approved order date of 6/9/2020. This application was protested, but there is no record of the protest being withdrawn. So, don't approve the NOI until I have some time this week to sort this one out. Meanwhile, enjoy Tampa. PRG

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**From:** Goetze, Phillip, EMNRD  
**Sent:** Tuesday, September 12, 2023 11:49 AM  
**To:** Green, Chelsey <[Chelsey.Green@dyn.com](mailto:Chelsey.Green@dyn.com)>  
**Cc:** Gebremichael, Million, EMNRD <[Million.Gebremichael@emnrd.nm.gov](mailto:Million.Gebremichael@emnrd.nm.gov)>; Chavez, Carl, EMNRD <[CarlJ.Chavez@emnrd.nm.gov](mailto:CarlJ.Chavez@emnrd.nm.gov)>; Wrinkle, Justin, EMNRD <[Justin.Wrinkle@emnrd.nm.gov](mailto:Justin.Wrinkle@emnrd.nm.gov)>  
**Subject:** Current Status: NOI for the Sand 18 Fed 1 SWD [Action ID: 248703]

Chelsey:

Million and I will be discussing the proposed actions for the identified NOI this week. At this time, Million is attending the GWPC and I am reviewing his recommendations with the intent to have this item resolved shortly. As to the referenced citation on Minor Modification, UIC Permit Section H.4.a.iii (as found in 40 CFR 144.11) is a determination for a requirement of notice. You are correct that the NOI could be approved administratively, but the modification of the tubing set is being considered an alteration (as found in 40 CFR 144.39(a)(1)) of the permit and is being considered in relation to its operational history and the content of the C-108 as approved under SWD-1427. Thank you for your inquiry on its status. PRG

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**From:** Green, Chelsey <[Chelsey.Green@dvn.com](mailto:Chelsey.Green@dvn.com)>  
**Sent:** Monday, September 11, 2023 12:47 PM  
**To:** Gebremichael, Million, EMNRD <[Million.Gebremichael@emnrd.nm.gov](mailto:Million.Gebremichael@emnrd.nm.gov)>; Goetze, Phillip, EMNRD <[phillip.goetze@emnrd.nm.gov](mailto:phillip.goetze@emnrd.nm.gov)>; Chavez, Carl, EMNRD <[Carlj.Chavez@emnrd.nm.gov](mailto:Carlj.Chavez@emnrd.nm.gov)>  
**Cc:** Harrison, John, EMNRD <[John.Harrison@emnrd.nm.gov](mailto:John.Harrison@emnrd.nm.gov)>  
**Subject:** RE: [EXTERNAL] Sand 18 Fed 1 SWD\_Action ID: 248703

Good afternoon,

I am following up to see if we have an estimated timeframe on the subject sundry?

Thank you,  
Chelsey Green  
**Regulatory Compliance Professional**

Devon Energy Production Co, L.P.  
333 W. Sheridan Ave.  
Oklahoma City, OK 73102  
(405) 228-8595

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**From:** Green, Chelsey  
**Sent:** Friday, September 1, 2023 1:08 PM  
**To:** Gebremichael, Million, EMNRD <[Million.Gebremichael@emnrd.nm.gov](mailto:Million.Gebremichael@emnrd.nm.gov)>; Goetze, Phillip, EMNRD <[phillip.goetze@emnrd.nm.gov](mailto:phillip.goetze@emnrd.nm.gov)>; Chavez, Carl, EMNRD <[Carlj.Chavez@emnrd.nm.gov](mailto:Carlj.Chavez@emnrd.nm.gov)>  
**Cc:** Harrison, John, EMNRD <[John.Harrison@emnrd.nm.gov](mailto:John.Harrison@emnrd.nm.gov)>  
**Subject:** RE: [EXTERNAL] Sand 18 Fed 1 SWD\_Action ID: 224460

Mr. Gebremichael,

The Sand 18 Fed 1 SWD sundry was resubmitted after the additional request had been completed based on the 224460 rejection. The new sundry id is 248703. I wanted to check on this sundry and see if we had an estimated time of review? Please let me know if anything additional is needed.

Thank you,

Chelsey Green  
**Regulatory Compliance Professional**

Devon Energy Production Co, L.P.  
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Oklahoma City, OK 73102  
(405) 228-8595

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**From:** Gebremichael, Million, EMNRD <[Million.Gebremichael@emnrd.nm.gov](mailto:Million.Gebremichael@emnrd.nm.gov)>  
**Sent:** Monday, June 12, 2023 5:42 PM  
**To:** Green, Chelsey <[Chelsey.Green@dvn.com](mailto:Chelsey.Green@dvn.com)>; Goetze, Phillip, EMNRD <[phillip.goetze@emnrd.nm.gov](mailto:phillip.goetze@emnrd.nm.gov)>; Chavez, Carl, EMNRD <[Carlj.Chavez@emnrd.nm.gov](mailto:Carlj.Chavez@emnrd.nm.gov)>  
**Cc:** Harrison, John, EMNRD <[John.Harrison@emnrd.nm.gov](mailto:John.Harrison@emnrd.nm.gov)>  
**Subject:** RE: [EXTERNAL] Sand 18 Fed 1 SWD\_Action ID: 224460



Permit and does not change the Area of Review considered in the application for the Permit;

- iv. Amendments to the plugging and abandonment plan;
- v. Changes in the types of fluids injected which are consistent with sources listed in the application for the Permit and do not change the classification of the Well;
- vi. Corrections of the actual injection interval if within the approved formation; or
- vii. Transfer of a Permit for a Well that has been spud. [40 CFR 144.41]

b. **Major Modifications.** OCD shall require notice and an opportunity for hearing for any modification that is not minor. For such modifications, Permittee shall submit Form C-108 and comply with the notice requirements of 19.15.26 NMAC

The proposed change to 4 inch OD injection tubing will not affect the permitted maximum injection rate, permitted maximum surface injection pressure, AOR, nor any other permit conditions. The increase in tubing size would strictly reduce pipe friction pressure.

Additionally, this would allow our pumps to run in the manufacturer-recommended pump curve preventing damage to the equipment reducing potential environmental impact. As an added measure to remain within the conditions of the permit, maximum injection rate and maximum surface injection pressure controls are programmed into the control logic to prevent exceeding the permitted parameters. Standard fishing/spear tools will allow the tubing to be extracted, if necessary.

If you require additional information or have any questions, please do not hesitate to reach out. Hopefully this context provides the necessary justification for a Minor Modification and we are able to proceed with the attached plan.

Thank you,  
Chelsey Green  
Regulatory Compliance Professional

Devon Energy Production Co, L.P.  
333 W. Sheridan Ave.  
Oklahoma City, OK 73102  
(405) 228-8595

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**From:** Gebremichael, Million, EMNRD <[Million.Gebremichael@emnrd.nm.gov](mailto:Million.Gebremichael@emnrd.nm.gov)>  
**Sent:** Tuesday, June 6, 2023 2:52 PM  
**To:** Harrison, John, EMNRD <[John.Harrison@emnrd.nm.gov](mailto:John.Harrison@emnrd.nm.gov)>; Goetze, Phillip, EMNRD <[phillip.goetze@emnrd.nm.gov](mailto:phillip.goetze@emnrd.nm.gov)>; Green, Chelsey <[Chelsey.Green@dvn.com](mailto:Chelsey.Green@dvn.com)>  
**Cc:** Chavez, Carl, EMNRD <[Carlj.Chavez@emnrd.nm.gov](mailto:Carlj.Chavez@emnrd.nm.gov)>  
**Subject:** RE: [EXTERNAL] Sand 18 Fed 1 SWD\_Action ID: 224460

The Sundry note was rejected due to the following reasons:

- API on the application is not same as the API in OCD's record.
- The tubing size stipulated in Order SWD -1481 is 3 1/2 " and after remediation work, only same size tubing could be replaced.

Should you have any question, please don't hesitate to reach out to UIC group.

Thanks,

**Million Gebremichael**

Petroleum Specialist- A  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
Cell : 505-4791137



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**From:** Harrison, John, EMNRD <[John.Harrison@emnrn.gov](mailto:John.Harrison@emnrn.gov)>  
**Sent:** Tuesday, June 6, 2023 1:26 PM  
**To:** Goetze, Phillip, EMNRD <[phillip.goetze@emnrn.gov](mailto:phillip.goetze@emnrn.gov)>  
**Cc:** Gebremichael, Million, EMNRD <[Million.Gebremichael@emnrn.gov](mailto:Million.Gebremichael@emnrn.gov)>; Chavez, Carl, EMNRD <[Carlj.Chavez@emnrn.gov](mailto:Carlj.Chavez@emnrn.gov)>  
**Subject:** FW: [EXTERNAL] Sand 18 Fed 1 SWD\_Action ID: 224460

Please see below...

Regards,

John Harrison

Oil Conservation Division  
1625 N. French Dr.  
Hobbs, New Mexico 88240



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**From:** Green, Chelsey <[Chelsey.Green@dn.com](mailto:Chelsey.Green@dn.com)>  
**Sent:** Tuesday, June 6, 2023 12:03 PM  
**To:** Harrison, John, EMNRD <[John.Harrison@emnrn.gov](mailto:John.Harrison@emnrn.gov)>  
**Subject:** [EXTERNAL] Sand 18 Fed 1 SWD\_Action ID: 224460

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Hi John,

I just submitted the subject sundry for workover operations on a SWD that is on a tight time frame. Can you please look at this for approval? If I need to send this to someone else since it is a SWD please let me know.

Thank you,

Chelsey Green

**Regulatory Compliance Professional**

Devon Energy Production Co, L.P.  
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Oklahoma City, OK 73102  
(405) 228-8595

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 1220 S. St Francis Dr., Santa Fe, NM 87505  
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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

CONDITIONS

Action 267171

**CONDITIONS**

Operator: STRATA PRODUCTION CO P.O. Box 1030 Roswell, NM 882021030	OGRID: 21712
	Action Number: 267171
	Action Type: [IM-SD] Admin Order Support Doc (ENG) (IM-AAO)

**CONDITIONS**

Created By	Condition	Condition Date
mgebremichael	None	9/19/2023