Initial

Application

Part I

Received: <u>12/21/2018</u>

This application is placed in file for record. It MAY or MAY NOT have been reviewed to be determined Administratively Complete

					Revised March 23, 2017
RECEIVED: 12112018	REVIEWER:	TYPE:	,	APP NO:	419004 51010
THIS CHECKLIS	- Geologic 220 South St. Fr ADMINISTE	CO OIL CONSE cal & Enginee cancis Drive, So RATIVE APPLIC ILL ADMINISTRATIVE AP	ring Burea anta Fe, Ni ATION CHI PLICATIONS FOR	DIVISION U - M 87505 ECKLIST EXCEPTIONS	TO DIVISION RULES AND
Applicant: Solaris Water	Midstream, LLC			OGE	RID Number: <u>371643</u>
Vell Name: Breckenridge					30-025-45151
ool: Proposed: SWD; Devoi	nian-Silurian				Code: 97869
1) TYPE OF APPLICATION A. Location – Spa	N: Check those	INDICATED E which apply fo	or [A]	PROCESS	STHE TYPE OF APPLICATION
□NSL	☐ NSP _{(Pf}		NSP _(PRORATIO)	N UNIT)	JEC 242018 4409:13
□DHC - II] Injection	ng <u>– Storage – N</u>	LC PC ure Increase - E	nhanced (]OLM Dil Recov]PPR	very
E. Notification F. Surface ow	ators or lease hole erriding royalty of requires publish and/or concurred and/or concurred er above, proof c	lders wners, revenue ed notice ent approval b ent approval b	owners y SLO y BLM	n is attac	FOR OCD ONLY Notice Complete Application Content Complete Ched, and/or,
3) CERTIFICATION: I he administrative approunderstand that no notifications are sub	oval is accurate action will be ta	and complete ken on this app	to the best	of my kr	
Note: State	ement must be comple	eted by an individua	l with manager	al and/or su	upervisory capacity.
Ben Stone			12/1 Date	9/2018	
Print or Type Name		7/		488-9850	
			Phor	ne Numbe	or .

Signature

ben@sosconsulting.us e-mail Address

McMillan, Michael, EMNRD

From:

ben@sosconsulting.us

Sent:

Friday, January 4, 2019 2:00 PM

To:

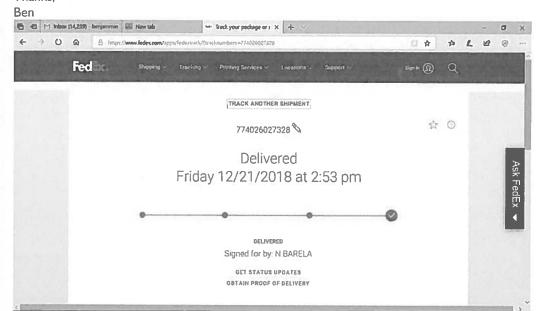
McMillan, Michael, EMNRD

Subject:

[EXT] Breckenridge delivery to OCD via FedEx...

Mike - screenshot of tracking...

Thanks,





P.O. Box 300 - Como, TX 75431 Visit us on the web at www.sosconsulting.us!

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December 19, 2018

New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

Attn: Ms. Heather Riley, Director

Re: Application of Solaris Water Midstream, LLC to drill and permit for salt water disposal the Breckenridge State SWD Well No.1, to be located in Section 32, Township 24 South, Range 35 East, NMPM, Lea County, New Mexico.

Dear Ms. Riley,

Please find the enclosed REVISED and updated form C-108 Application for Authority to Inject, supporting the above-referenced request for salt water disposal. The well will be operated as a commercial endeavor offering operators in the area additional options for produced water disposal. This application was mostly prepared by ALL Consulting, LLC but Solaris has since moved the proposed location to accommodate offset concerns. The revised application package includes new AOR maps and a new notice list. *All other details of the proposed SWD are as originally planned and that portion of the application is utilized for most of those items.*

Published legal notice runs December 20, 2018 in the Hobbs News-Sun and all offset operators and other interested parties have been notified individually. The well is located on state land and minerals. There are state and federal lands & minerals and private minerals within the one-mile radius notice area; the State Land Office, Bureau of Land Management and offset operators have been notified of this application.

Solaris Water Midstream is a major provider of salt water disposal services to operators in southeast New Mexico and seeks to optimize efficiency, both economically and operationally, of all its operations. Approval of this application is consistent with that goal as well as the NMOCD's mission of preventing waste and protection of correlative rights.

I respectfully request that the approval of this salt water disposal well proceed swiftly and if you or your staff requires additional information or has any questions, please do not hesitate to call or email me.

Best regards,

Ben Stone, Partner SOS Consulting, LLC

Agent for Solaris Water Midstream, LLC

Cc: Application attachment and file

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, New Mexico 87505 FORM C-108 Revised June 10, 2003

APPLICATION FOR AUTHORIZATION TO INJECT

I. PURPOSE: Salt Water Disposal and the application QUALIFIES for administrative approval.

II. OPERATOR: Solaris Water Midstream, LLC

ADDRESS: 701 Tradewinds Blvd., Suite C, Midland, TX 79706

CONTACT PARTY: Agent: SOS Consulting, LLC - Ben Stone (903) 488-9850

- III. WELL DATA: All well data and applicable wellbore diagrams are ATTACHED.
- IV. This is not an expansion of an existing project.
- V. A map is attached that identifies all wells and leases within two miles of any proposed injection well with a one-half mile radius circle drawn around each proposed injection well. This circle identifies the well's area of review.
- *VI. A tabulation is attached of data on all wells of public record within the area of review which penetrate the proposed injection zone.

 There are NO (0) Wells in the subject AOR which Penetrate the proposed Devonian interval. The data includes a description of each well's type, construction, date drilled, location, depth, and a schematic of any plugged well illustrating all plugging detail.

 NO P&A Wells penetrate.
- VII. The following data is ATTACHED on the proposed operation, including:
 - 1. Proposed average and maximum daily rate and volume of fluids to be injected;
 - 2. Whether the system is open or closed;
 - 3. Proposed average and maximum injection pressure;
 - 4. Sources and an appropriate analysis of injection fluid and compatibility with the receiving formation if other than reinjected produced water; and,
 - If injection is for disposal purposes into a zone not productive of oil or gas at or within one mile of the proposed well, attach a chemical analysis of the disposal zone formation water (may be measured or inferred from existing literature, studies, nearby wells, etc.).
- *VIII. Appropriate geologic data on the injection zone is ATTACHED including appropriate lithologic detail, geologic name, thickness, and depth. Give the geologic name, and depth to bottom of all underground sources of drinking water (aquifers containing waters with total dissolved solids concentrations of 10,000 mg/l or less) overlying the proposed injection zone as well as any such-sources known to be immediately underlying the injection interval.
- IX. Stimulation program a conventional acid job may be performed to clean and open the formation.
- *X. Attach appropriate logging and test data on the well. (If well logs have been filed with the Division, they need not be resubmitted). Well Logs will be filed with OCD.
- *XI. There are NO water wells/ PODs within one mile of the proposed salt water disposal well.
- XII. An affirmative statement is ATTACHED that available geologic and engineering data has been examined and no evidence was found of open faults or any other hydrologic connection between the disposal zone and any underground sources of drinking water.
- XIII. "Proof of Notice" section on the next page of this form has been completed and ATTACHED. There are 5 offset lessees and/or operators within 1 mile and state and federal minerals all have been noticed. Well location is State.
- XIV. Certification: I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

NAME: Ben Stone TITLE: SOS Consulting, LLC agent for Solaris Water Midstream, LLC

SIGNATURE: ______ DATE: 12/19/2018

E-MAIL ADDRESS: ben@sosconsulting.us

* If the information required under Sections VI, VIII, X, and XI above has been previously submitted, it need not be resubmitted. Please show the date and circumstances of the earlier submittal:

FORM C-108 – APPLICATION FOR AUTHORIZATION TO INJECT (cont.)

III. WELL DATA - The following information and data is included (See ATTACHED Wellbore Schematic):

- A. The following well data must be submitted for each injection well covered by this application. The data must be both in tabular and schematic form and shall include:
 - (1) Lease name; Well No., Location by Section, Township and Range; and footage location within the section.
 - (2) Each casing string used with its size, setting depth, sacks of cement used, hole size, top of cement, and how such top was determined.
 - (3) A description of the tubing to be used including its size, lining material, and setting depth.
 - (4) The name, model, and setting depth of the packer used or a description of any other seal system or assembly used.

Division District Offices have supplies of Well Data Sheets which may be used or which may be used as models for this purpose. Applicants for several identical wells may submit a "typical data sheet" rather than submitting the data for each well.

- B. The following must be submitted for each injection well covered by this application. All items must be addressed for the initial well. Responses for additional wells need be shown only when different. Information shown on schematics need not be repeated.
 - (1) The name of the injection formation and, if applicable, the field or pool name.
 - (2) The injection interval and whether it is perforated or open-hole.
 - (3) State if the well was drilled for injection or, if not, the original purpose of the well.
 - (4) Give the depths of any other perforated intervals and detail on the sacks of cement or bridge plugs used to seal off such perforations.
 - (5) Give the depth to and the name of the next higher and next lower oil or gas zone in the area of the well, if any.

XIV. PROOF OF NOTICE pursuant to the following criteria is ATTACHED.

All applicants must furnish proof that a copy of the application has been furnished, by certified or registered mail, to the owner of the surface of the land on which the well is to be located and to each leasehold operator within one-half mile of the well location.

Where an application is subject to administrative approval, a proof of publication must be submitted. Such proof shall consist of a copy of the legal advertisement which was published in the county in which the well is located. The contents of such advertisement must include:

- (1) The name, address, phone number, and contact party for the applicant;
- (2) The intended purpose of the injection well; with the exact location of single wells or the Section, Township, and Range location of multiple wells;
- (3) The formation name and depth with expected maximum injection rates and pressures; and,
- (4) A notation that interested parties must file objections or requests for hearing with the Oil Conservation Division, 1220 South St. Francis Dr., Santa Fe, New Mexico 87505, within 15 days.

NO ACTION WILL BE TAKEN ON THE APPLICATION UNTIL PROPER PROOF OF NOTICE HAS BEEN SUBMITTED.

C-108 - Item III

Subject Well Data

The following exhibits were part of the original ALL Consulting, LLC C-108 application for this well.

These exhibits include Well Construction Detail, Operational Narrative, Geological Assessment with Formation Tops and an Hydrological Affirmative Statement.

Application for Authorization to Inject

Well Name: Breckenridge State SWD #1

III - Well Data (The Wellbore Diagram is included as Attachment 1)

A.

(1) General Well Information:

Operator: Solaris Water Midstream, LLC

Lease Name & Well Number: Breckenridge State SWD #1

Well Footage: 2,595' FSL & 1,545' FWL Moved to 300' FSL & 500' FEL

Location: S32 T24S R35E

Casing Information:

Туре	Hole Size	Casing Size	Casing Weight	Setting Depth	Sacks of Cement	Estimated TOC	Method Determined
Surface	24"	20"	94.0 lb/ft	800'	1,020	Surface	Circulation
Intermediate 1	17-1/2"	13-3/8"	54.5 lb/ft	5,400'	3,170	Surface	Circulation
Intermediate 2	12-1/4"	9-5/8"	53.5 lb/ft	12,990'	3,420	Surface	Circulation
Liner	8-1/2"	7-5/8"	39 lb/ft	15,770'	200	12,690'(TOL)	CBL

(2) Tubing Information:

5-1/2" (23#) Internal Plastic Coated Tubing swedged down to 5" (18#) with setting depth of 15,750'

(3) Packer Information: Lok-set or equivalent packer set at 15,750'

В.

- (1) Injection Formation Name: Devonian and Silurian-Fusselman formations
- (2) Injection Interval: Open-hole injection between 15,770' 17,150'
- (3) Drilling Purpose: New Drill for Salt Water Disposal
- (4) Other Perforated Intervals: No other perforated intervals exist.
- (5) Overlying Oil and Gas Zones:
 - Delaware (5,380')
 - Bone Springs (9,100')
 - Wolfcamp (12,255')
 - Atoka (13,800')
 - Morrow (14,425')

Underlying Oil and Gas Zones: No underlying oil and gas zones exist.

V - Well and Lease Maps

A well map and lease map are included in Attachment 2.

VI – AOR Well List

A list of the wells within the AOR is included in Attachment 2.

VII - Proposed Operation

- (1) Proposed Maximum Injection Rate: 30,000 bpd Solaris increase to 40,000 bpd Proposed Average Injection Rate: 15,000 bpd
- (2) A closed system will be used.
- (3) Proposed Maximum Injection Pressure: 3,154 psi (surface)
 Proposed Average Injection Pressure: approximately 1,500 2,000 psi (surface)
- (4) Source Water Analysis: It is expected that the injectate will consist of produced water from production wells completed in the Wolfcamp and Bone Springs formations. Analysis of water from these formations is included in **Attachment 3**.
- (5) Injection Formation Water Analysis: The proposed well will be injecting water into the Devonian and Silurian-Fusselman formation which is known to be compatible with formation water from the Wolfcamp and Bone Springs formations. Water analyses from Silurian-Fusselman could not be located; however, water analyses from the Devonian formation in the area are included in Attachment 4:

VIII - Geologic Description

The proposed injection interval includes the Devonian and Silurian-Fusselman formations from 15,770 – 17,150 feet. These formations consist of carbonates including light colored dolomite and chert intervals interspersed with some tight limestone intervals. Several thick sections of porous dolomite capable of taking water are present within the subject formations in the area.

The freshwater formation is the Rustler at a depth of approximately 775 feet. Water well depths in the area range from 97-431 feet below ground surface.

IX - Proposed Stimulation Program

A small cleanup acid job may be used to remove mud and drill cuttings from the formation. However, no other formation stimulation is currently planned.

X - Logging and Test Data

Logs will be submitted to the Division upon completion of the well.

XI – Fresh Groundwater Samples

Based on a review of data from the New Mexico Office of the State Engineer, no groundwater wells are located within the 1-mile of the proposed SWD location; therefore, no groundwater samples were collected in association with this application. A water well map of the area is included in **Attachment 5**.

XII - No Hydrologic Connection Statement

No faulting is present in the area that would provide a hydrologic connection between the injection interval and overlying USDWs. Additionally, the casing program has been designed to ensure there will be no hydrologic connection between the injection interval and overlying USDWs. A letter from a knowledgeable and qualified expert stating that there is a low risk of seismic activity from the proposed injection activities is included in **Attachment 6**.

XIII - Proof of Notice

A Public Notice was filed with the Hobbs News-Sun newspaper and an affidavit is included in **Attachment 7**.

A copy of the application was mailed to the OCD District Office, landowner, and leasehold operators within the AOR of the proposed SWD location. A list of recipients, as well as delivery confirmations, are included in **Attachment** 7.

SURFACE ELEVATION 3,303' TOTAL DEPTH 17,250' MUD LOGGING **RKB DRILL** CASING SIZE (IN.) E LOGGING/ MD TVD MUD FRAC BOPF **FORMATION** SIZE TUBING GRAD WT. DIRECTIONAL **CEMENT (SACKS)** (IN.) RKB GRND LEVEL-3,303 GL ELEV SET AND GROUTED 120 / 120 OPEN 32" 8.8 GROUT TO SURFACE 24" 8.4 PERMIAN RUSTLER FM (USDW) 775 20" 800 94# J55 BTC 800 26-3/4"-3M ANNULAR/DIVERTER 1,020 SACKS, CEMENTED TO SURFACE (23#) IPC TUBING 9.5 17 1/2" MUD LOGGING TO BEGIN to 10.0 AT 2500' PERMIAN DELAWARE MTN. 5.380 13 3/8" GROUP 54.5# 1-55 5,400 / 5,400 21-3/4" -5M ANNULAR 21-3/4" -5M BOP 10.0 9.4 3,170 SACKS, CEMENTED TO SURFACE DV TOOL AT ±3,300'IN 9 " OPEN HOLE, ECP BELOW 9,100 PERMIAN BONE SPRING FM. 9.4 12 1/4" to 10.0 12,255 PERMIAN WOLFCAMP FM. 12,490 TOL 12,690 / 12,690 9 5/8" 12,990 / 12,990 13-5/8" -10M ANNULAR 13-5/8" -10M BOP 53.5# P110 BTC 10.0 3,420 SACKS, CEMENTED TO SURFACE 13,610 PENNSYLVANIAN STRAWN FM. (18#) IPC TUBING PENNSYLVANIAN ATOKA FM. 13,800 12.5 8 1/2" 14.6 PENNSYLVANIAN MORROW 14,425 FM. LOK-SET PACKER (OR EQUIV.) AT 15,750 15,770 DEVONIAN 15,770 / 15,770 13-5/8" -10M ANNULAR 13-5/8" -10M BOP 39# P110, ST-L 200 SACKS, EST. TOC 12,690 BY CATALOGUE SALCATIVE DATE OF THE SALE OF MANY BY CATALOGUE OF THE SALE OF TH 6 1/2" 9.0 GR/NEUTRON 17,350 - 0 13-5/8" -10M ANNULAR Base of FUSSELMAN FM 13-5/8" -10M BOP DUAL 0" 17,150 USIT/CBL 15,770-0 TD 17,250 / 17,250

BRECKENRIDGE STATE SWD #1



PN # 1680 NM.00 JUNE 2018





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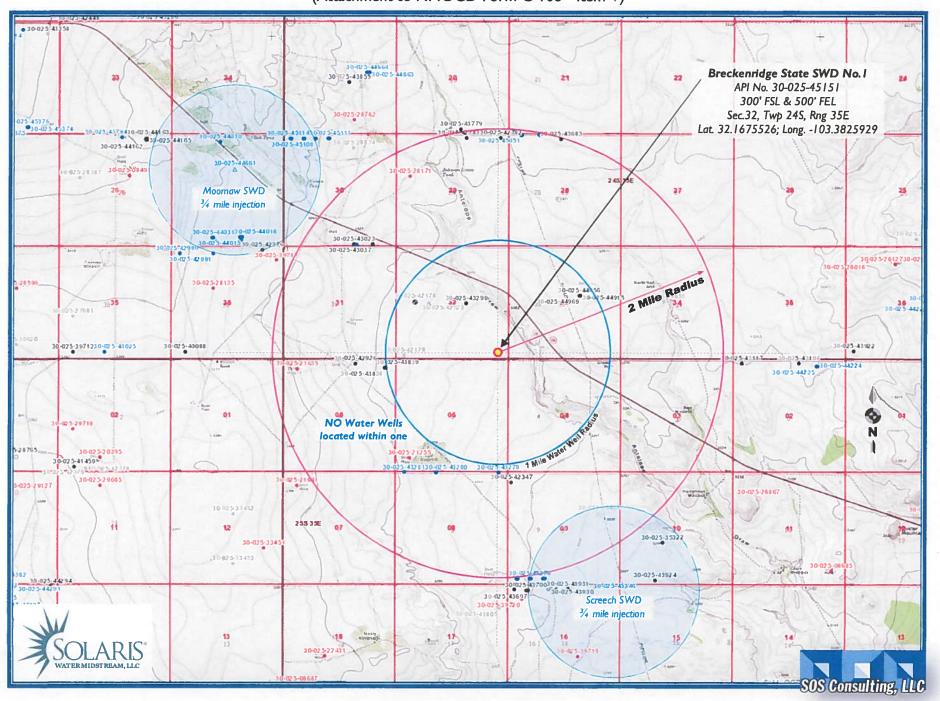
SIZE

NTS

WELL BORE DATA SHEET

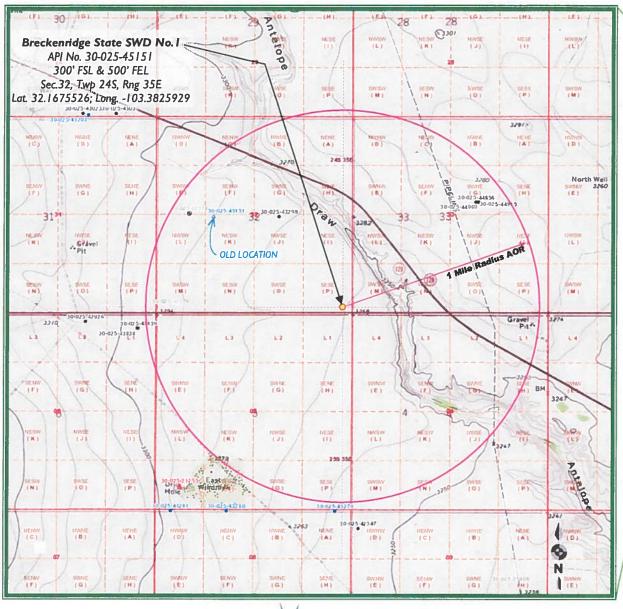
Breckenridge State SWD No.1 - Area of Review / 2 Miles

(Attachment to NMOCD Form C-108 - Item V)



Breckenridge State SWD Well No.1 - Area of Review / Overview Map

(Attachment to NMOCD Form C-108, Application for Authority to Inject.)



10.7 miles W/NW of Jal, NM





Lea County, New Mexico



C-108 ITEM VII - PRODUCED WATER ANAYLSES

This information was provided as part of the original C-108 application submitted by ALL Consulting, LLC

Water Analyses follow this page.

Attachment 3

Source Water Analyses



Water Analysis

Date: 23-Aug-11

2708 West County Road, Hobbs NM 88240 Phone (575) 392-5556 Fax (575) 392-7307

Company .	400	Well Name	Draw 1#	State		
		BD		New Mexico		
Sample Source	Swab Sa	ımple	Sample #	day	1-265-29	
Formation			Depth			
Specific Gravity	1.170		SG @	60 °F	1.172	
рН	6.30		S	ulfidas	Absent	
Temperature (*F)	70		Reducing I	Agents		
Cations						
Sodium (Calc)		in Mg/L	77,982	in PPM	66,520	
Celcium		in Mg/L	4,000	in PPM	3,413	
Magnesium		in Mg/L	1,200	In PPM	1,024	
Soluable fron (FE2)		In Mg/L	10.0	in PPM	9	
Antons						
Chlorides		in Mg/L	130,000	in PPM	110,922	
Sulfates		in Mg/L	250	in PPM	213	
Bicarbonales		in Mg/L	127	in PPM	108	
Total Hardness (as CaCO	3)	in Mg/L	15,000	in PPM	12,799	
Total Dissolved Solida (Ca	(c)	in Mg/L	213,549	in PPM	182,209	
Equivalent NaCl Concentr	etion	in Mg/L	182,868	in PPM	156,031	
icaling Tendencies						
Calcium Carbonale Index Bebw 500,000	Remote / 500,	000 - 1,000,000	Possible / Above 1,	000,000 Probable	507,520	
Calcium Sulfete (Gyp) Indi	9X				1,000,000	
8 elow 800,000	Remote / 500,	000-10,000.00	Possible / Above 10	,000,000 Probabl	la	
This Colculation is only an approachment.	oximation and	i le only valid b	efore treatment of	a well or eavers	l weeks after	

Sec ZZ, TZS,S,RZ8E Bone Spring

North Permiss Basin Region P.O. Box 740 Sundown, TX 79372-0740 (806) 229-6121 Lab Yearn Leader - Shells Hernandez (432) 495-7240

Water Analysis Report by Baker Petrolite

Company:

Sales RDT:

33514.1

Region:

PERMIAN BASIN

Account Manager: TONY HERNANDEZ (575) 910-7135

534665

Агеа:

ARTESIA, NM

PINOCHLE BPN' STATE COM Lease/Platform:

Sample #: Analysis ID #:

106795 \$90.00

Entity (or well #):

2 H

Analysis Cost:

Formation:

UNKNOWN

Sample Point:

WELLHEAD

Summary	Analysis of Sample 534665 @ 75 F									
Sampling Date: 03/10/11	Anions	mg/l	Npem	Cotions	mg/l	Npem				
Analysis Date: 03/18/11 Analysi: SANDRA GOMEZ TD8 (mg/t or g/m3): 184911.1 Density (g/cm3, tonne/m3): 1.113 Anion/Cation Ratio: 1	Chloride: 10 Bloarbonate: Carbonate: Sulfate: Phosphate: Borate: Silicate:	98618.0 2135.0 0.0 747.0	3091.92 34.99 0. 15.55	Sodium: Megneslum: Calcium: Strontium: Berlum: Iron: Potassium:	70275,7 195,0 844.0 220.0 0,8 6.5 889,0	3056.82 18.04 42.12 5.02 0.01 0.23				
Carbon Dioxide: 0 50 PPM Oxygen: Comments:	Hydrogen Sulfide; pH at time of analysis: pH used in Calculation:		0 PPM 7	Aluminum: Chromlum: Coppec: Lead; Manganese: Nickel:	0.100	0.				

Cond	lions	Values Calculated at the Given Conditions - Amounts of Scale in Ib/1000 bbl										
Temp Gauge Press.	Calcite CaCO ₃		Gypnum CaSO_22H ₂ 0		Anhydrite CaSO ₄		Celestite 8rSO ₄		Barite BaSO ₄		CO ₂ Press	
f	psi	Index	Amount	Index	Amount	Index	Amount	kebni	Amount	Indox	Amount	pel
80	0	1.08	188.52	-1.20	0.00	-1.18	0.00	-0.11	0.00	0.56	0.29	1.72
100	0	1,10	208.05	-1.29	0.00	-1.20	0.00 .	-0.15	0.00	0.35	0.29	2.36
120	0	1.12	224.17	-1.38	0.00	-1.19	0.00	-0.17	0.00	0.16	0.00	3,17
140	0	1.13	243.17	-1.42	0.00	-1.18	000	-0.18	0.00	0.00	0.00	4.21

Note 1: When assessing the severity of the scale problem, both the saturation index (31) and amount of scale must be considered.

Note 2: Precipitation of each scale to considered separately. Total scale will be test than the sum of the amounts of the five scales.

Hote 3: The reported CO2 pressure is noticely the calculated CO2 fugacity. It is usually nearly the same as the CO2 partial pressure.

Attachment 4

Injection Formation Water Analyses

| Section | Sect

Source; Go-Tech (http://gotech.nent.edu/gotech/Water/producedwater.asps)

C-108 - Item VIII

Geological Data

EARTHQUAKE / SEISMIC INFORMATION SUPPLEMENT

The following attachment is the seismic assessment of the area for the Breckenridge State SWD project.

Mr. Dan Arthur of ALL Consulting, LLC is an expert in the field.

This exhibit is was provided and included in the original location C-108.

Attachment 6

Induced Seismicity Assessment Letter

August 7, 2018

Mr. Phillip Goetze, P.G. NM EMNRD – Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87505

Subject: Induced Seismicity Potential Statement for the Breckenridge State SWD #1

Dear Mr. Goctze,

This letter provides information regarding the seismic potential associated with injection operations associated with Solaris Water Midstream, LLC's (Solaris), proposed Breckenridge State SWD #1, hereinafter referred to as the "Subject Well".

As outlined herein, based on my experience as an expert on the issue of induced seismicity, it is my opinion that the potential for the proposed injection well to cause injection-induced seismicity is expected to be minimal, at best. This conclusion is based on (1) the lack of historic seismic activity and faulting in the area, (2) the low fault slip potential (FSP) of Precambrian faults in the area, (3) the presence of confining layers, and (4) the overall vertical distance between the proposed injection zone and basement rock.

The Subject Well, is located 2,595' FSL & 1,545' FWL of Section 32, in T24-S and R35-E of Lea County, New Mexico. Historically, the Lea County area has experienced very limited recorded seismic activity (per the U.S. Geological Survey [USGS] earthquake catalog database). The closest recorded seismic event was a M2.9 that occurred on December 4, 1984, and was located approximately 11.46 miles northwest of the subject well (See Exhibit 1). The closest Class IID well injecting into the same formations (Devonian-Silurian) of the Subject Well is approximately 2.10 miles to the northwest (See Exhibit 1).

Solaris does not own either 2D or 3D seismic reflection data in the area of the Subject Well. Fault data from USGS indicates that the closest known fault is approximately 35.45 miles west of the Subject Well (See Exhibit 1).

In a recent paper written by Snee and Zoback (2018) entitled "State of Stress in the Permian Basin, Texas and New Mexico: Implications for Induced Seismicity,", the authors found that large groups of mostly north-south striking Precambrian basement faults, predominantly located along the Central Basin Platform, the western Delaware Basin, and large parts of the Northwest Shelf (which includes Eddy and Lea counties, New Mexico) have low FSP at the modeled fluid-pressure perturbation. The map in Exhibit 2 depicts the low probability risk of FSP for the Delaware Basin and Northwest Shelf areas (Snee and Zoback 2018).

Geologic analysis indicates that the proposed Devonian-Silurian injection zone is overlain by approximately 200 to 400 feet of Woodford Shale, which is the upper confining zone and will serve as a barrier for upward injection fluid migration. Additionally, the Simpson Group that lies directly below the Montoya Formation will act as a lower confining zone to prohibit fluids from migrating downward into the underlying Ellenberger Formation and Precambrian basement rock. See the stratigraphic column for the Delaware Basin included in Exhibit 3.

In the Eddy and Lea Counties area of New Mexico, the Simpson Group is comprised of a series of Middle to Upper Ordovician carbonates, several sandstones, and sandy shales that range from approximately 350 to 650 feet thick (Jones 2008). This group of rocks is capped by the limestones of the Bromide Formation, which is approximately 200 feet thick in this area (Jones 2008). The closest deep well drilled into the Precambrian basement was completed by the Skelly Oil Company in 1975. This well is located in Section 17, Range 36E, Township 25S of Lea County (API No.30-025-25046) and encountered 602 feet of Ellenburger Formation before reaching the top of the Precambrian granite at a depth of 18,920 feet. Based on the estimated thickness of the Simpson Group and Ellenburger Formation in this area, the Precambrian basement should be approximately 1,000 to 1,200 feet below the bottom of the proposed injection zones in the Subject Well.

Conclusion

As an expert on the issue of induced seismicity, it is my opinion that the potential for the proposed injection well to cause injection-induced seismicity is expected to be minimal, at best. This conclusion is based on (1) the lack of historic seismic activity and faulting in the area, (2) the low FSP of Precambrian faults in the area, (3) the presence of confining layers, and (4) the overall vertical distance between the proposed injection zone and basement rock.

Sincerely, ALL Consulting

J. Daniel Arthur, P.E., SPEC President and Chief Engineer

Enclosures References Exhibits Induced Seismicity Potential Statement for the Breckenridge State SWD #1 August 7, 2018

References

Induced Seismicity Potential Statement for the Breckenridge State SWD #1 August 7, 2018

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Induced Seismicity Potential Statement for the Breckenridge State SWD #1 August 7, 2018

Exhibits

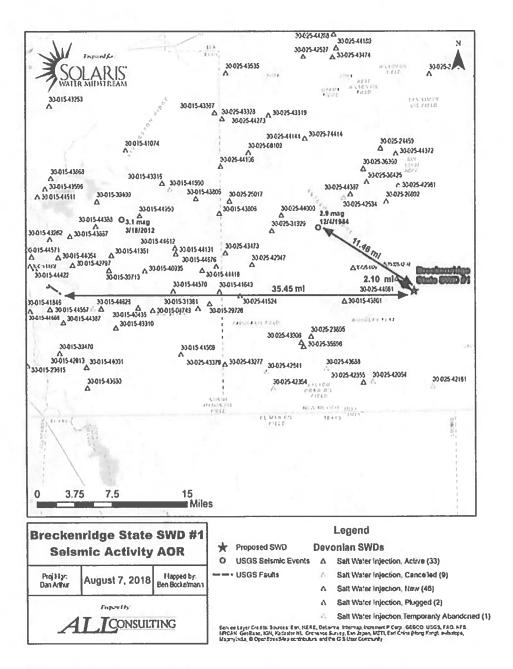


Exhibit 1. Map Showing the Distances from Known and Inferred Faults, Scismic Event, and Closest Deep Injection Well

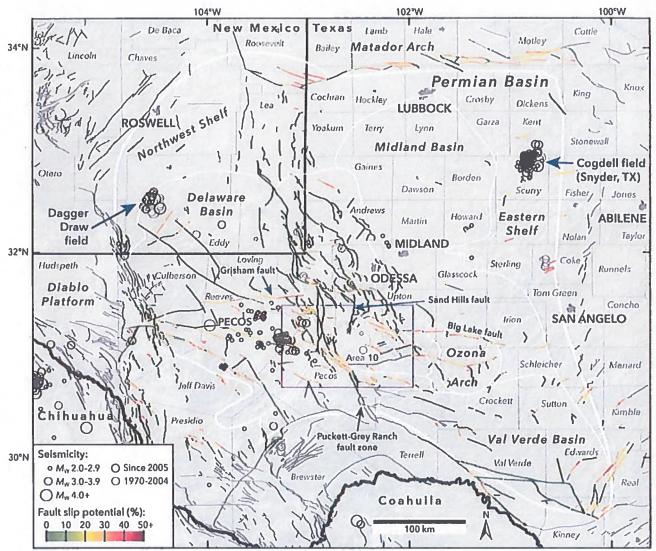


Exhibit 2. Results of the Suce and Zoback (2018) Probabilistic FSP Analysis Across the Permian Basin

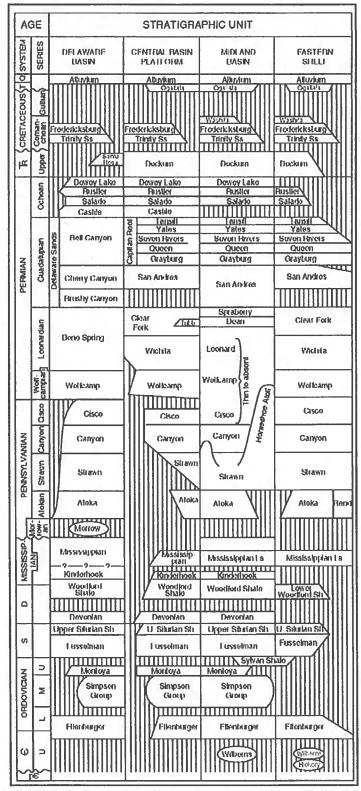


Exhibit 3. Delaware Basin Stratigraphic Chart (Ball 1995)

C-108 ITEM XIII - PROOF OF NOTIFICATION

IDENTIFICATION AND NOTIFICATION OF INTERESTED PARTIES

Exhibits for Section

Affected Parties Map

List of Interested Parties

Notification Letter to Interested Parties

Proof of Certified Mailing

Published Legal Notice

Breckenridge State SWD Well No.1 – Affected Parties Plat

(Attachment to NMOCD Form C-108, Application for Authority to Inject.)

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- LEGEND -

T.1 – V0-9265-0001 – COG Operating, LLC

T.4 – NMNM-125657 – V-F Petroleum, Inc.

T.2 - Private - Tap Rock Operating, LLC

T.5 – NMNM-132948 – COG Operating, LLC Split Estate – Private Surface / BLM Minerals

T.3 – Private – Destiny Management, Inc.

T.6 - Private - Bert Madera

C-108 ITEM XIII – PROOF OF NOTIFICATION **AFFECTED PARTIES LIST**

SOS Consulting is providing electronic delivery of C-108 applications.

ALL APPLICABLE AFFECTED PARTIES ARE PROVIDED A LINK IN THE NOTICE LETTER TO A SECURE SOS/ CITRIX SHAREFILE® SITE TO VIEW AND DOWNLOAD A FULL COPY OF THE SUBJECT C-108 APPLICATION IN PDF FORMAT.

"AFFECTED PERSON" MEANS THE DIVISION DESIGNATED OPERATOR. IN THE ABSENCE OF AN OPERATOR, A LESSEE WHOSE INTEREST IS EVIDENCE BY A WRITTEN CONVEYANCE DOCUMENT EITHER OF RECORD OR KNOWN TO THE APPLICANT AS OF THE DATE THE APPLICANT FILES THE APPLICATION; OR IN THE ABSENCE OF AN OPERATOR OR LESSEE, A MINERAL INTEREST OWNER WHOSE INTEREST IS EVIDENCED BY A WRITTEN CONVEYANCE DOCUMENT EITHER OF RECORD OR KNOWN TO THE APPLICANT AS OF THE DATE THE APPLICANT FILED THE APPLICATION FOR PERMIT TO INJECT.; PER OCD RULES NMAC 19.15.26.7, A. AND 19.15.26.8, B.2.

SURFACE OWNER

STATE OF NEW MEXICO (Notified via USPS Certified Mail) Oil, Gas and Minerals Division 310 Old Santa Fe Trail Santa Fe, NM 87504 Certified: 7018 0360 0001 8569 5951

OFFSET MINERALS LESSEES and OPERATORS (All Notified via USPS Certified Mail)

State Lease V0-9265-0001 and BLM Lease NMNM-132948 (Including Split Estate) T.1 and T.5 on Map)

Lessse and Operator

COG OPERATING, LLC Attn: Brian Collins

2208 W. Main Street

Artesia, New Mexico 88210-3720 Certified: 7018 0360 0001 8569 5968

BLM Lease NMNM-013996 (T.2 on Map)

Operator

TAP ROCK OPERATING, LLC 602 Park Point Drive, Ste. 200 Golden, CO 80401

Certified: 7018 0360 0001 8569 5975

Private Lease (T.3 on Map)

Owner

DESTINY MANAGEMENT, INC. 1004 N Big Spring St #220 Midland, TX 79701 Certified: 7018 0360 0001 8569 5982

BLM Lease NMNM-125657 (T.4 Map) Lessee

V-F PETROLEUM INC P. O. Box 1889 Midland, TX 79702 Certified: 7018 0360 0001 8569 5999

C-108 ITEM XIII - PROOF OF NOTIFICATION AFFECTED PARTIES LIST (cont.)

Private Lease (T.6 on Map) Owner

6 BERT MADERA 125 Bellavia Circle Ruidoso, New Mexico 88252 Certified: 7018 0360 0001 8569 6002

OFFSET MINERALS OWNERS (Notified via USPS Certified Mail)

U.S. DEPARTMENT OF INTERIOR
Bureau of Land Management
Oil & Gas Division
620 E. Greene St.
Carlsbad, NM 88220
Certified: 7018 0360 0001 8569 6019

STATE OF NEW MEXICO Oil, Gas and Minerals Division 310 Old Santa Fe Trail Santa Fe, NM 87504

REGULATORY

NEW MEXICO OIL CONSERVATION DIVISION (FedEx'ed original and copy) 1220 S. St. Francis Dr. Santa Fe, NM 87505

NEW MEXICO OIL CONSERVATION DIVISION (FedEx'ed copy) 1625 N. French Drive Hobbs, NM 88240

STATE OF NEW MEXICO (FedEx'ed copy)
Oil, Gas and Minerals Division
310 Old Santa Fe Trail
Santa Fe, NM 87504





December 19, 2018

NOTIFICATION TO INTERESTED PARTIES via U.S. Certified Mail – Return Receipt Requested

To Whom It May Concern:

Solaris Water Midstream, LLC, Midland, Texas, has made application to the New Mexico Oil Conservation Division to drill and complete for salt water disposal the Breckenridge State SWD Well No.1. The proposed commercial operation will be for produced water disposal from area operators. As indicated in the notice below, the well is located in Section 32, Township 24 South, Range 35 East in Lea County, New Mexico.

The published notice states that the interval will be from 15,770 feet to 17,150 feet into the Devonian, Silurian and Fusselman formations.

Following is the notice published in the Hobbs News-Sun, Hobbs, New Mexico on or about December 20, 2018.

LEGAL NOTICE

Solaris Water Midstream, LLC, 701 Tradewinds Blvd., Suite C, Midland, TX 79706, is filing Form C-108 (Application for Authority to Inject) with the New Mexico Oil Conservation Division seeking administrative approval for a salt water disposal well. The proposed well, the Breckenridge State SWD No.1, is located 300' FSL and 500' FEL, Section 32, Township 24 South, Range 35 East, Lea County, New Mexico. The proposed SWD was originally applied for at a different location but is being moved to accommodate offset concerns. Produced water from area production will be commercially disposed into the Devonian, Silurian and Fusselman formations at a depth of 15,770' to 17,150' at a maximum surface pressure of 3154 psi and a rate limited only by such pressure. The proposed SWD well is located approximately 10.7 miles west/ northwest of Jal, NM.

Interested parties wishing to object to the proposed application must file with the New Mexico Oil Conservation Division, 1220 St. Francis Dr., Santa Fe, NM 87505, (505)476-3460 within 15 days of the date of this notice. Additional information may be obtained from the applicant's agent, SOS Consulting, LLC, (903)488-9850 or, email info@sosconsulting.us.

You have been identified as a party who may be interested as an offset lessee or operator.

You are entitled to a full copy of the application. A full copy in PDF format is posted on the SOS Consulting **ShareFile** site and is available for immediate download.

Use the URL link: https://sosconsulting.sharefile.com/d-sd51a00d622f4bc88 (Please Note: The ShareFile service is powered by Citrix Systems and is completely secure.*)

The link to this file will be active for 30 days from the date of this letter. Your company can access and download the file a maximum of five (5) times. (One copy may be downloaded and shared as needed among your company.)

If preferred, you may call SOS Consulting, LLC at 903-488-9850, or email info@sosconsulting.us, and the same PDF file copy will be expedited to you via email.

Please use a subject like "Breckenridge St SWD Dec 2018 PDF Copy Request".

Thank you for your attention in this matter.

Best regards,

Ben Stone, SOS Consulting, LLC

Agent for Solaris Water Midstream, LLC

Cc: Application File

SOS Consulting is committed to providing superior quality work using technology to assist clients and affected parties in obtaining the documentation required. SOS will continue to utilize methods which are less energy and resource intensive including, the reduction of paper copies.

We hope you'll partner with us and appreciate these efforts.

* You will be asked for your email, name and company.

This will not be used by anyone except keeping track of the file downloads.

You will not be solicited by SOS or anyone else. Data is stored on Citrix Systems servers only.



C-108 - Item XIV

Proof of Notice – Legal Notice Newspaper of General Circulation

LEGAL NOTICE DECEMBER 20, 2018

Solaris Water Midstream, LLC, 701 Tradewinds Blvd., Suite C, Midland, TX 79706, is filling Form C-108 (Application for Authority to Inject) with the New Mexico Oil Conservation Division seeking administrative approval for a salt water disposal well. The proposed well, the Breckenridge State SWD No.1, is located 300' FSL and 500' FSL, Section 32, Township 24 South, Range 35 East, Lea County, New Mexico. The proposed SWD was originally applied for at a different location but is being moved to accommodate offset concerns. Produced water from area production will be commercially disposed into the Devonian, Silurian and Fusselman formations at a depth of 15,770' to 17,150' at a maximum surface pressure of 3154 psi and a rate limited only by such pressure. The proposed SWD well is located approximately 10.7 miles west/northwest of Jal, NM.

Interested parties wishing to object to the proposed application must file with the New Mexico Oil Conservation Division, 1220 St. Francis Dr., Santa Fe, NM 87505, (505)476-3460 within 15 days of the date of this notice. Additional information may be obtained from the applicant's agent, SOS Consulting, LLC, (903)488-9850 or, email info@sosconsulting.us. #33557

The above is the "Proof Copy" sent from the Hobbs News-Sun. The affidavit of publication will be forwarded as soon as it is received.

Affidavit of Publication

STATE OF NEW MEXICO COUNTY OF LEA

I, Daniel Russell, Publisher of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, solemnly swear that the clipping attached hereto was published in the regular and entire issue of said newspaper, and not a supplement thereof for a period of 1 issue(s).

> Beginning with the issue dated December 20, 2018 and ending with the issue dated December 20, 2018.

Sworn and subscribed to before me this 20th day of December 2018.

Business Manager

My commission expires
January 29, 2019

OFFICIAL SEAL GUSSIE BLACK Notary Public State of New Mexico My Commission Expires 1-29-

This newspaper is duly qualified to publish ទី legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937 and payment of fees for said

LE(e)/NLC:

LEGAL NOTICE **DECEMBER 20, 2018**

Solaris Water Midstream, LLC, 701 Tradevinds Bivd, Suile C, Midland, TX 79706, is filling Form C-108 (Application for Authority to Inject) with the New Mexico Oil Conservation Division seaking administrative approval for a salt water disposal well. The proposed well, the Breckenridge State SWD No.1, is located 300 FSL and 500 FEL. Section 32, Township 24 South, Range 35 East, Lea County, New Mexico, The proposed SWD was driginally applied for at a different location but is being moved to accommodate offset concerns. Produced water from area production will be eoppmercially disposed into the Devonian, Slurian and Fusselman formations at a depth of 15,770 to 17,150 at, a maximum surface pressure of 3154 psi and a rate limited only by such pressure. The proposed SWD well is located approximately 10.7 miles west/northwest of Jai, NM. Interested parties wishing to

Interested parties wishing to object to the proposed application must file with the New Year Colif Conservation Division, 1220 St. Francis Dr., Santa Fe, NM 87505, (505)476-3480 within 5 days of the date of this notice. Additional information may be obtained from the applicant's agent. SOS Consulting, LLC, (803)488-9850 or, email info@sosconsulting.us.

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00222465

BEN STONE SOS CONSULTING, LLC. P.O. BOX 300 COMO, TX 75431

C-108 - Item XIV

Proof of Notice (Certified Mail Receipts)



C-108 - Item XIV

Proof of Notice (Certified Mail Receipts - cont.)

