

Simmons, Kurt, EMNRD

From: McClure, Dean, EMNRD
Sent: Wednesday, July 15, 2020 11:53 AM
To: Simmons, Kurt, EMNRD
Subject: FW: [FWD: C-108 Application for the South Vacuum Unit No. 353 (30-025-03152)]

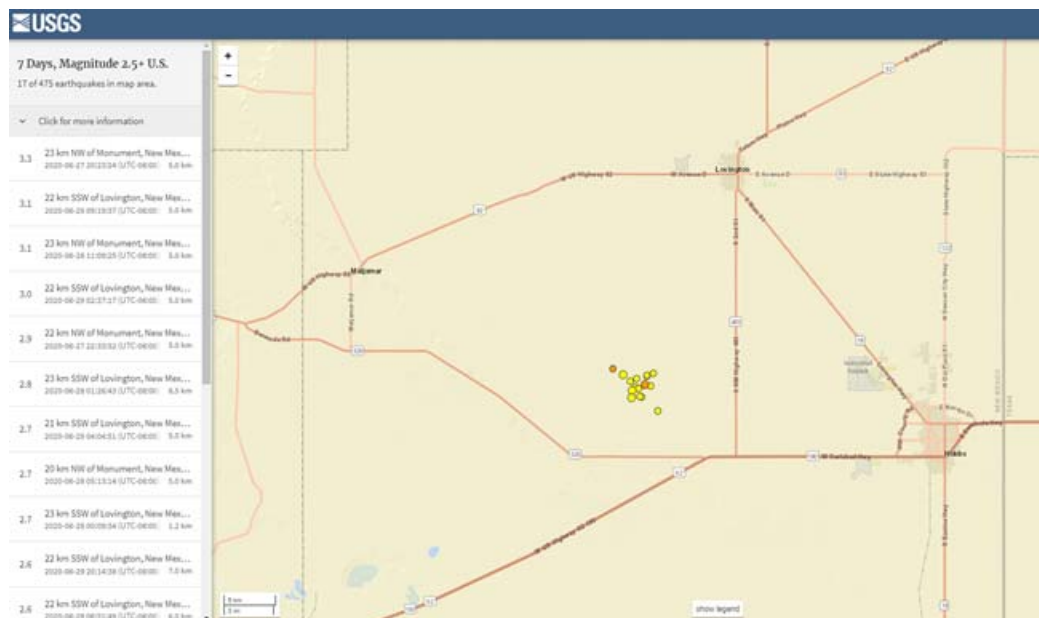
Dean McClure
Petroleum Specialist A, Oil Conservation Division
New Mexico Energy, Minerals and Natural Resources Department
(505) 476-3471

From: Goetze, Phillip, EMNRD <Phillip.Goetze@state.nm.us>
Sent: Friday, July 10, 2020 7:01 AM
To: Rachel Milne <ramilne@progressivepcs.net>
Cc: Lamkin, Baylen, EMNRD <Baylen.Lamkin@state.nm.us>; McClure, Dean, EMNRD <Dean.McClure@state.nm.us>; Sandoval, Adrienne, EMNRD <Adrienne.Sandoval@state.nm.us>
Subject: FW: [FWD: C-108 Application for the South Vacuum Unit No. 353 (30-025-03152)]

RE: C-108 Application for the South Vacuum Unit No. 353 (30-025-03152); Appl. No. pMAM1905951156

Ms. Milne:

This application for this well for injection authority cannot progress at this time. The well is situated within the immediate area of recent seismic events that are being investigated by the OCD.



This investigation includes a review of possible sources of seismicity related to deep disposal operations. The OCD will retain the application with a final determination to be made following the conclusion of the investigation. Please contact me with any questions regarding this matter. PRG

From: McClure, Dean, EMNRD <Dean.McClure@state.nm.us>
Sent: Monday, July 6, 2020 2:08 PM
To: Goetze, Phillip, EMNRD <Phillip.Goetze@state.nm.us>
Cc: Lamkin, Baylen, EMNRD <Baylen.Lamkin@state.nm.us>
Subject: FW: [FWD: C-108 Application for the South Vacuum Unit No. 353 (30-025-03152)]

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

From: McClure, Dean, EMNRD
Sent: Monday, June 29, 2020 4:54 PM
To: 'Rachel Milne' <ramilne@progressivepcs.net>
Subject: RE: [FWD: C-108 Application for the South Vacuum Unit No. 353 (30-025-03152)]

Hello Rachel,

I have a few other recompletes that I need to look at and will add this to that list if another tech reviewer has not picked this up in the meantime.

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

From: Rachel Milne <ramilne@progressivepcs.net>
Sent: Monday, June 29, 2020 4:32 PM
To: McClure, Dean, EMNRD <Dean.McClure@state.nm.us>
Subject: [EXT] RE: [FWD: C-108 Application for the South Vacuum Unit No. 353 (30-025-03152)]

Hi Dean,

I am just checking in to see if any progress has been made on this SWD application, I believe last time we spoke it still had not gone through technical review.

This well only has TA status until 1-31-2021 so Catena needs to try to determine what they will be able to do with the well before that expires.

Thank You,

Rachel Milne
Regulatory Analyst III
Progressive Consulting
1761 N. Emerson St
Denver, CO 80218
o: (303) 309-1656
c: (303) 513-7667
e: ramilne@progressivepcs.net

www.progressivepcs.net



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From: McClure, Dean, EMNRD <Dean.McClure@state.nm.us>
Sent: Tuesday, February 25, 2020 1:35 PM
To: Rachel Milne <ramilne@progressivepcs.net>
Subject: RE: [FWD: C-108 Application for the South Vacuum Unit No. 353 (30-025-03152)]

Hello Rachel,

I am unsure what sort of time frame to expect. Right now additional staff have been hired to process these applications, but at the same time there is an increased level of interest in these SWDs which can cause each application to be quite tedious.

Dean McClure
Petroleum Specialist
New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
(505) 476-3471

From: Rachel Milne <ramilne@progressivepcs.net>
Sent: Tuesday, February 25, 2020 12:50 PM
To: McClure, Dean, EMNRD <Dean.McClure@state.nm.us>
Subject: [EXT] RE: [FWD: C-108 Application for the South Vacuum Unit No. 353 (30-025-03152)]

Hi Dean,

Thank you, how long does it normally take to get reviewed by a tech reviewer, I am just trying to determine how much longer until there may be an approval on it.

Thank You,

Rachel Milne
Regulatory Analyst III
Progressive Consulting
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From: McClure, Dean, EMNRD <Dean.McClure@state.nm.us>
Sent: Tuesday, February 25, 2020 12:45 PM
To: Rachel Milne <ramilne@progressivepcs.net>
Subject: RE: [FWD: C-108 Application for the South Vacuum Unit No. 353 (30-025-03152)]

Hello Rachel,

After looking in a few more places, I did find this application. It looks like it is in que waiting for review by a tech reviewer. There isn't any good way to view the status of this application from your end, but you are able to see if any additional files or notes get attached to OCD imaging by going to <http://ocdimage.emnrd.state.nm.us/Imaging/AEOrderCriteria.aspx>, selecting salt water disposal in the drop down, and typing in the application number that was assigned to this application, 1979.

Dean McClure
Petroleum Specialist
New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
(505) 476-3471

From: Rachel Milne <ramilne@progressivepcs.net>
Sent: Tuesday, February 25, 2020 12:07 PM
To: McClure, Dean, EMNRD <Dean.McClure@state.nm.us>
Subject: [EXT] FW: [FWD: C-108 Application for the South Vacuum Unit No. 353 (30-025-03152)]

Hi Dean,

Below is the history of this well and application.

Thank You,

Rachel Milne
Regulatory Analyst III
Progressive Consulting
1761 N. Emerson St
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o: (303) 309-1656
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From: Merch Merchant <mymerch@penrocoil.com>
Sent: Tuesday, February 4, 2020 1:15 PM
To: Anthony Riggan <ariggan@catenares.com>
Subject: Fwd: [FWD: C-108 Application for the South Vacuum Unit No. 353 (30-025-03152)]

From: danny@pwlrc.net
Date: February 4, 2020 at 11:26:12 AM MST
To: Merch Merchant <MYMERCH@PENROCOIL.COM>
Subject: [FWD: C-108 Application for the South Vacuum Unit No. 353 (30-025-03152)]

Merch,

Below is the email accompanied with the resubmittal of the C-108 application after Pogo secured the ACOI. See Phillip Goetz's email response deep in this email string where he states that the original application was originally technically approved but could not be approved due to the compliance issues. Hope this helps.

Danny J. Holcomb
Holcomb Consultants
6900 Spring Cherry Lane
Amarillo, Tx 79124
Cell: 806-471-5628
Email: danny@pwlrc.net

----- Original Message -----

Subject: C-108 Application for the South Vacuum Unit No. 353
(30-025-03152)
From: <danny@pwlrc.net>
Date: Thu, April 18, 2019 11:15 am
To: "Jones, William V, EMNRD" <WilliamV.Jones@state.nm.us>

Will,
Hope you and your family are doing well.

Pogo took your advice in the email string below. We refreshed ownership data, renotified parties of interest, published a new legal notice in the newspaper and then resubmitted the C-108 application to OCD. It was logged in as received on 2/27/19. Since it had been technically approved last fall and we have not received any protests, we request that OCD please expedite approval of this application. The operator now has additional area production shut in due to lack of water handling opportunities. Additionally, this well is part of an ACOI with a looming deadline and the downhole work to convert the well to SWD will take some time.

Your assistance in this matter would be greatly appreciated.

Thank you,
Danny J. Holcomb
Cell: 806-471-5628
Email: danny@pwillc.net

----- Original Message -----

Subject: RE: [EXT] [FWD: RE: Denial of C-108 Application for the South Vacuum Unit No. 353]
From: "Jones, William V, EMNRD" <WilliamV.Jones@state.nm.us>
Date: Mon, January 28, 2019 1:43 pm
To: "danny@pwillc.net" <danny@pwillc.net>

Hi Danny,

I don't want to step on any toes here, if so, I may have to start doing these again, which would be tragic.

However, the question is innocent enough, and Mr. Phil is really busy. Our attorneys once opined on the life of a notice and gave us several months for things like this.

However, things have changed so much recently and almost all our owners in the Permian basin are churning properties every day.

I would ask for a quick redo of ownership determinations, Then repost the notices, including the newspaper notice, and send this in again, with a note attached that the older application was already evaluated by Phil last August.

Hope you and your family are also doing well,

Take Care,
Will

From: danny@pwillc.net <danny@pwillc.net>
Sent: Monday, January 28, 2019 12:09 PM
To: Jones, William V, EMNRD <WilliamV.Jones@state.nm.us>
Subject: [EXT] [FWD: RE: Denial of C-108 Application for the South Vacuum Unit No. 353]

Will,
Hope things are going well for you and your family.

I reached out to Phillip by phone on 1/9 concerning the questions below and haven't heard back. I understand the OCD's hearing schedule is very heavy now and driving your group's workload.

Pogo had an SWD AO for the subject well denied back in August due to compliance issues. They have now obtained ACOI-349A and are actively working on those wells. As Phillip's email below says "The result of the (C-108) assessment supports the technical aspect for disposal in the proposed interval". Pogo desires the OCD to reconsider the original C-108 for the subject well. My outreach to Phillip was to question whether the OCD would pick the previous C-108 back up since it had been technically approved or if Pogo had to complete a new C-108 and resubmit from scratch. Could you please clarify this for us?

Thank you in advance for your assistance.

Danny J. Holcomb
Cell: 806-471-5628
Email: danny@pwillc.net

----- Original Message -----

Subject: RE: Denial of C-108 Application for the South Vacuum Unit No.

353

From: <danny@pwillc.net>

Date: Wed, December 05, 2018 1:42 pm

To: "Goetze, Phillip, EMNRD" <Phillip.Goetze@state.nm.us>

Cc: "Merch Merchant" <mymerch@penrocoil.com>

Phillip,

Pogo Oil & Gas Operating, Inc now has ACOI-349-A in place covering the subject well. The operator signed and returned the agreement 12/4/18 so it has not made it into the OCD Order files as yet.

Pogo would like for the OCD to reconsider it's previously submitted C-108 application for this well now that the compliance issues have been resolved. If you have any questions, please let me know.

Thank you,

Danny J. Holcomb

Agent for Pogo Oil & Gas Operating, Inc

Cell: 806-471-5628

Email: danny@pwillc.net

----- Original Message -----

Subject: Denial of C-108 Application for the South Vacuum Unit No. 353

From: "Goetze, Phillip, EMNRD"

<Phillip.Goetze@state.nm.us>

Date: Mon, August 27, 2018 1:44 pm

To: "danny@pwillc.net" <danny@pwillc.net>

Cc: "Jones, William V, EMNRD"

<WilliamV.Jones@state.nm.us>, "McMillan,

Michael, EMNRD" <Michael.McMillan@state.nm.us>, "

Sanchez, Daniel J.,

EMNRD" <daniel.sanchez@state.nm.us>

RE: South Vacuum Unit SWD Well No. 353 (API 30-025-03152; Admin. Appl. No pMAM1730658966) Unit C; Sec 35, T18S, R35E, NMPM, Lea County

Danny:

The C-108 application for the South Vacuum Unit SWD Well No. 353 was reviewed by the Division for the issuance of injection authority into a Devonian interval. The result of the assessment supports the technical aspect for disposal in the proposed interval; however, the issuance of any administrative order, or Division hearing order, cannot be approved due to the applicant's continued non-compliance with the inactive wells (19.15.26.8(A) NMAC, *The division*

shall grant a permit for injection under [19.15.26.8](#) NMAC only to an operator who is in compliance with Subsection A of [19.15.5.9](#) NMAC.) and associated ACOI currently in place. Pogo Oil & Gas Operating, Inc. (OGRID 372000) must resolve all outstanding issues regarding the inactive well situation prior to any injection authority being issued to this operator. The application is cancelled and operator may reapply once back in compliance.

Please contact me with any questions regarding this application or the content of this correspondence. Thank you. PRG

Phillip Goetze, PG
Engineering Bureau, Oil Conservation Division
New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive, Santa Fe, NM 87505
Direct: 505.476.3466
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