

Additional Information

Extension of Time

Request

12/10/2021

State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham
Governor

Sarah Cottrell Propst
Cabinet Secretary

Todd E. Leahy, JD, PhD
Deputy Secretary

Adrienne Sandoval, Division Director
Oil Conservation Division



BY ELECTRONIC MAIL ONLY

December 10, 2021

Deana M. Bennett, Esq
Modrall Sperling
P.O. Box 2168
Albuquerque, New Mexico 87103-2168
deana.bennett@modrall.com

Re: Order R-21196
Extension of Injection Authority
Ramrod Fee SWD No. 1, [30-015-PENDING]

Order R-20955
Extension of Injection Authority
Vortex Federal SWD No. 1, [30-025-PENDING]

Order R-20954
Extension of Injection Authority
Carpet Bomb Federal SWD No. 1 [30-025-PENDING]

Dear Ms. Bennett:

The Oil Conservation Division (“OCD”) has reviewed your September 30, 2021 request to extend the deadline in the referenced order to commence injection into referenced well. The request, which was received prior to the deadline, states the reasons for granting an extension, that no additional wells penetrating the approved injection interval have been drilled within the Area of Review since the referenced order was granted, and that additional affected parties in the AOR, if any, were notified of your extension request and did not protest the extension. Accordingly, OCD reviews your request administratively.

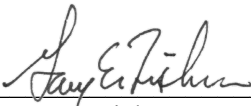
On December 18, 2020, OCD adopted a new form of order granting injection authority for UIC wells to ensure the prevention of waste and the protection of correlative rights, public health, and the environment as required by the Oil and Gas Act and OCD's delegation of authority from the U.S. Environmental Protection Agency. A copy of the new form of order is attached for your review. OCD will issue this form of order for any new applications to inject and requests to extend the deadline to commence injection under existing orders. Please advise whether you concur in the granting of injection authority using the new form of order as set forth below.


Adrienne Sandoval
Director

cc: OCD Engineering Bureau

**CONSENT TO ISSUANCE OF PERMIT USING NEW TEMPLATE
AND WAIVER OF RIGHT OF APPEAL**

Permian Oilfield Partners, LLC, having reviewed the new form of order for injection authority for UIC wells, consents to issuance of an order based thereon, and waives its right of appeal of such order or any condition in such order to any forum or tribunal. Permian Oilfield Partners, LLC understands that OCD may determine that additional conditions are necessary and appropriate to prevent waste and protect correlative rights, public health, and the environment, and retains its right of appeal with respect to such additional conditions. Permian Oilfield Partners, LLC further warrants that the undersigned person is authorized to execute this Consent and Waiver on its behalf.


Gary E Fisher
President

Rose-Coss, Dylan H, EMNRD

From: Deana M. Bennett <deana.bennett@modrall.com>
Sent: Monday, December 13, 2021 2:44 PM
To: Engineer, OCD, EMNRD
Cc: Tremaine, Jesse K, EMNRD; Biernoff, Ari; Ames, Eric, EMNRD; Sandoval, Adrienne, EMNRD; Polak, Tiffany, EMNRD; Powell, Brandon, EMNRD; Goetze, Phillip, EMNRD; Fuge, Dylan, EMNRD
Subject: RE: [EXTERNAL] RE: Permian Oilfield Partners Request for Extension of Time to Commence Injection Operations Under Order R-21196--Ramrod Fee SWD # 1
Attachments: OCD Response to Permian Oilfield Partners - Request to Extend Injection Authority for Vortex Ramrod Carpet Bomb- Final - December 10 2021.pdf

Good Afternoon!

Thanks so much for your letters. Permian Oilfield Partner's appreciates the Division's thoughtful approach to Permian's requests for an extensions of time. Attached please find the letter relating to the following wells/orders:

- Order R-21196 Ramrod Fee SWD No. 1, [30-015-PENDING]
- Order R-20955 Vortex Federal SWD No. 1, [30-025-PENDING]
- Order R-20954 Carpet Bomb Federal SWD No. 1 [30-025-PENDING].

As requested, Mr. Fisher has signed the "Consent to Issuance of Permit Using New Template and Waiver of Right to Appeal."

Please let me know if you need any additional information.

Thanks again,

Deana



Deana M. Bennett

Lawyer

Modrall Sperling | www.modrall.com

P.O. Box 2168 | Albuquerque, NM 87103-2168

500 4th St. NW, Ste. 1000 | Albuquerque, NM 87102

D: 505.848.1834 | O: 505.848.1800

From: Engineer, OCD, EMNRD <OCD.Engineer@state.nm.us>
Sent: Monday, December 13, 2021 2:16 PM
To: Deana M. Bennett <deana.bennett@modrall.com>
Cc: Tremaine, Jesse K, EMNRD <JesseK.Tremaine@state.nm.us>; Biernoff, Ari <abiernoff@slo.state.nm.us>; Ames, Eric, EMNRD <Eric.Ames@state.nm.us>; Sandoval, Adrienne, EMNRD <Adrienne.Sandoval@state.nm.us>; Polak, Tiffany, EMNRD <Tiffany.Polak@state.nm.us>; Powell, Brandon, EMNRD <Brandon.Powell@state.nm.us>; Goetze, Phillip, EMNRD <Phillip.Goetze@state.nm.us>; Fuge, Dylan, EMNRD <Dylan.Fuge@state.nm.us>
Subject: RE: [EXTERNAL] RE: Permian Oilfield Partners Request for Extension of Time to Commence Injection Operations Under Order R-21196--Ramrod Fee SWD # 1

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Deana,

Attached please find two letters detailing the OCD's decisions regarding the Permian Oilfield Partner's requests to extend injection authority under current UIC permits.

One of the letters addresses the injection authority for the following Orders:

- Order R-21196 Ramrod Fee SWD No. 1, [30-015-PENDING]
- Order R-20955 Vortex Federal SWD No. 1, [30-025-PENDING]
- Order R-20954 Carpet Bomb Federal SWD No. 1 [30-025-PENDING]

The other letter addresses the extension to commence injection for:

- Administrative Order SWD-2103 (Straight Shooter State SWD #1)
- Administrative Order SWD-2121 (Abyss Federal SWD #1)
- Hearing Order No. R-20953 (Bullseye Federal SWD #1)

Should you or Permian Oilfield Partners have additional questions about these matters, please feel free to respond to the OCD.Engineer email address, or Eric Ames.

Regards,

Dylan Rose-Coss

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

C: (505) 372-8687



From: Deana M. Bennett <deana.bennett@modrall.com>

Sent: Thursday, November 4, 2021 6:00 PM

To: Engineer, OCD, EMNRD <OCD.Engineer@state.nm.us>

Cc: Tremaine, Jesse K, EMNRD <JesseK.Tremaine@state.nm.us>; Biernoff, Ari <abiernoff@slo.state.nm.us>; Ames, Eric, EMNRD <Eric.Ames@state.nm.us>

Subject: [EXTERNAL] RE: Permian Oilfield Partners Request for Extension of Time to Commence Injection Operations Under Order R-21196--Ramrod Fee SWD # 1

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Hello,

I wanted to follow up on the four extension requests I submitted for Permian Oilfield Partners. Please let me know if there is any additional information you need from me or from Permian. Appreciate it!

For convenience, the four wells for which I submitted extension requests are:

- Vortex Federal SWD #1
- Ramrod Fee SWD #1
- Carpet Bomb Federal SWD #1
- Bullseye Federal SWD #1

Thanks much,

Deana



Deana M. Bennett

Lawyer

Modrall Sperling | www.modrall.com

P.O. Box 2168 | Albuquerque, NM 87103-2168

500 4th St. NW, Ste. 1000 | Albuquerque, NM 87102

D: 505.848.1834 | O: 505.848.1800

From: Deana M. Bennett

Sent: Tuesday, October 26, 2021 11:54 AM

To: 'Engineer, OCD, EMNRD' <OCD.Engineer@state.nm.us>

Cc: 'Tremaine, Jesse K, EMNRD' <JesseK.Tremaine@state.nm.us>; 'Biernoff, Ari' <abiernoff@slo.state.nm.us>

Subject: RE: Permian Oilfield Partners Request for Extension of Time to Commence Injection Operations Under Order R-21196--Ramrod Fee SWD # 1

Hello,

I hope this email finds you well. I am writing to follow up on the four extension requests I submitted for Permian Oilfield Partners. Please let me know if you have any questions or if I can provide any additional information.

Thanks again,

Deana



Deana M. Bennett

Lawyer
Modrall Sperling | www.modrall.com
P.O. Box 2168 | Albuquerque, NM 87103-2168
500 4th St. NW, Ste. 1000 | Albuquerque, NM 87102
D: 505.848.1834 | O: 505.848.1800

From: Deana M. Bennett

Sent: Thursday, September 30, 2021 4:20 PM

To: 'Engineer, OCD, EMNRD' <OCD.Engineer@state.nm.us>

Cc: 'Tremaine, Jesse K, EMNRD' <JesseK.Tremaine@state.nm.us>; 'Biernoff, Ari' <abiernoff@slo.state.nm.us>

Subject: Permian Oilfield Partners Request for Extension of Time to Commence Injection Operations Under Order R-21196--Ramrod Fee SWD # 1

Hello,

Attached please find a written request submitted on behalf of Permian Oilfield Partners, LLC (Permian) requesting an extension of time to commence injection under Order R-21196 in the Ramrod Fee SWD #1. As you will see from the attached request, Permian's plans to develop this injection well have been delayed for a number of reasons, including among other things COVID and the State Land Office's de novo hearing for this order. The SLO's de novo case has now been dismissed and the SLO has filed with the Division a withdrawal of its objections to this well. You will also see that Permian is willing to either incorporate language from the new UIC form of permit or even have its current order replaced by the new form of UIC order, as part of its extension request. As you will see from the attached, the SLO, also cc'd on this email, concurs in Permian's extension request.

I will be submitting similar extension requests for three other Permian SWD orders that were also subject to de novo hearing applications, and which de novo cases have also been dismissed and the SLO's objections withdrawn.

Please let me know if you have any questions or if I can provide any further information. On behalf of Permian, I appreciate your consideration of this request, as does Permian.

Thanks much,

Deana



Deana M. Bennett

Lawyer

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500 4th St. NW, Ste. 1000 | Albuquerque, NM 87102

D: 505.848.1834 | O: 505.848.1800

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