

State of New Mexico  
Energy, Minerals and Natural Resources Department

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**Susana Martinez**  
Governor

**Ken McQueen**  
Cabinet Secretary

**Matthias Sayer**  
Deputy Cabinet Secretary

**David R. Catanach, Division Director**  
Oil Conservation Division



Administrative Order SWD-1675  
June 12, 2017

**ADMINISTRATIVE ORDER  
OF THE OIL CONSERVATION DIVISION**

Pursuant to the provisions of Division Rule 19.15.26.8B. NMAC, Permian TDS, LLC (the "operator") seeks an administrative order for its re-entry of the SV Sundown State SWD Well No. 1 with a location of 477 feet from the South line and 191 feet from the West line, Unit M of Section 14, Township 10 South, Range 37 East, NMPM, Lea County, New Mexico, for commercial disposal of produced water.

**THE DIVISION DIRECTOR FINDS THAT:**

The application has been duly filed under the provisions of Division Rule 19.15.26.8B. NMAC and satisfactory information has been provided that affected parties as defined in said rule have been notified and no objections have been received within the prescribed waiting period. The applicant has presented satisfactory evidence that all requirements prescribed in Rule 19.15.26.8 NMAC have been met and the operator is in compliance with Rule 19.15.5.9 NMAC.

**IT IS THEREFORE ORDERED THAT:**

The applicant, Permian TDS, LLC (OGRID 3026958), is hereby authorized to utilize its SV Sundown State SWD Well No. 1 (API 30-025-32750) with a location of 477 feet from the South line and 191 feet from the West line, Unit M of Section 14, Township 10 South, Range 37 East, NMPM, Lea County, for disposal of oil field produced water (UIC Class II only) through an open-hole interval consisting of the Devonian and Silurian formations from 12140 feet to approximately 12700 feet.

Injection will occur through internally-coated, 3-1/2-inch flush joint or integral joint tubing – or smaller OD tubing as permitted by the Hobbs district office. Further, a packer shall be set within 100 feet of the top of the open-hole interval.

*This permit does not allow disposal into the Ellenburger formation (lower Ordovician) or lost circulation intervals directly on top and obviously connected to this formation. The operator shall provide logs and a mudlog over the proposed interval which verify that only the permitted interval is completed for disposal.*

IT IS FURTHER ORDERED THAT:

*The operator shall file (Notice of Intention) Form C-103 and under guidance of the Hobbs district office of the Division perform the following:*

- a. Drill out shallower plugs down to the CIBP at approximately 12040 feet.*
- b. Run a cement bond log (or equivalent) from PBTD to surface.*
- c. Pressure test and isolate (locate) any casing leaks.*
- d. Squeeze cement as needed to repair leaks and to cover the San Andres formation from 5350 feet to 4000 feet.*

*These requirements shall be completed successfully prior to running injection tubing inside the 5-1/2-inch casing.*

The operator shall take all steps necessary to ensure that the disposed water enters only the approved disposal interval and is not permitted to escape to other formations or onto the surface. This includes the completion and construction of the well as proposed in the application and, if necessary, as modified by the District Supervisor.

After installing tubing, the casing-tubing annulus shall be loaded with an inert fluid and equipped with a pressure gauge or an approved leak detection device in order to determine leakage in the casing, tubing, or packer. The casing shall be pressure tested from the surface to the packer setting depth to assure casing integrity.

The well shall pass an initial mechanical integrity test ("MIT") prior to initially commencing disposal and prior to resuming disposal each time the disposal packer is unseated. All MIT procedures and schedules shall follow the requirements in Division Rule 19.15.26.11(A) NMAC. The Division Director retains the right to require at any time wireline verification of completion and packer setting depths in this well.

The wellhead injection pressure on the well shall be limited to **no more than 2428 psi**. In addition, the disposal well or system shall be equipped with a pressure limiting device in workable condition which shall, at all times, limit surface tubing pressure to the maximum allowable pressure for this well.

The Director of the Division may authorize an increase in tubing pressure upon a proper showing by the operator of said well that such higher pressure will not result in migration of the disposed fluid from the target formations. Such proper showing shall be demonstrated by sufficient evidence including but not limited to an acceptable Step-Rate Test.

The operator shall notify the supervisor of the Division's District I office of the date and time of the installation of disposal equipment and of any MIT so that the same may be inspected and witnessed. The operator shall provide written notice of the date of commencement of disposal

to the Division's District I office. The operator shall submit monthly reports of the disposal operations on Division Form C-115, in accordance with Division Rules 19.15.26.13 and 19.15.7.24 NMAC.

The injection authority granted under this order is not transferable except upon Division approval. The Division may require the operator to demonstrate mechanical integrity of any injection well that will be transferred prior to approving transfer of authority to inject.

The Division may revoke this injection order after notice and hearing if the operator is in violation of Rule 19.15.5.9 NMAC.

The disposal authority granted herein shall terminate two (2) years after the effective date of this Order if the operator has not commenced injection operations into the subject well. One year after the last date of reported disposal into this well, the Division shall consider the well abandoned, and the authority to dispose will terminate *ipso facto*. The Division, upon written request mailed by the operator prior to the termination date, may grant an extension thereof for good cause.

Compliance with this Order does not relieve the operator of the obligation to comply with other applicable federal, state or local laws or rules, or to exercise due care for the protection of fresh water, public health and safety and the environment.

Jurisdiction is retained by the Division for the entry of such further orders as may be necessary for the prevention of waste and/or protection of correlative rights or upon failure of the operator to conduct operations (1) to protect fresh or protectable waters or (2) consistent with the requirements in this order, whereupon the Division may, after notice and hearing, terminate the disposal authority granted herein.



**DAVID R. CATANACH**  
**Director**

DRC/mam

cc: Oil Conservation Division – Hobbs District Office  
New Mexico State Land Office – Oil, Gas, and Minerals  
Well File – 30-025-32750