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STATE OF NEW MEXICO
OIL CONSERVATION COMMISSION

Status Conference for Case
Numbers: 14720, 23463, 23294,
23464

VIDEOCONFERENCE OIL CONSERVATION
MEETING/HEARING

DATE: Thursday, May 11, 2023
TIME: 9:00 a.m.
BEFORE: Chair Dylan Fuge
LOCATION: New Mexico State Capital
490 Old Santa Fe Trail
Santa Fe, New Mexico
REPORTED BY: Dana Fulton, Notary Public
JOB NO.: 5531754

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A P P E A R A N C E S

ON BEHALF OF NEW MEXICO OIL CONSERVATION COMMISSION:

FLORENE DAVIDSON

New Mexico Oil Conservation Commission

Energy Minerals and Natural Resources Department

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A P P E A R A N C E S (Cont'd.)

ALSO PRESENT:

- Dylan Fuge, Chairman
- Greg Bloom, Commissioner
- William Ampomah, Commissioner
- Jesse Tremaine
- Brandon Powell
- Melissa Troutman
- Brent
- Sophia Jenkins Nieto
- Soni Grant
- Mary R.
- Katherine Akramen
- Bianca Sopoci-Belknap
- Elizabeth West
- Joni Arends
- Dana Hardy
- Deana Bennett
- John Nicholson
- David White
- Million Gebremichael
- Katherine Shera
- Jiawei Tu

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OPENING STATEMENT By Mr. Tremaine 67, 95, 152
OPENING STATEMENT By Ms. Bennett 97

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By Ms. Hardy 56

MILLION GEBREMICHAEL

By Mr. Tremaine 68

By Ms. Hardy 78

JOHN NICHOLSON

By Ms. Hardy 99

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E X H I B I T S

NO.	DESCRIPTION	ID/EVD
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Targa:

Exhibit 1	Red Hills AGI #1 Data	57/66
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NO.	DESCRIPTION	ID/EVD
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OCD:

Exhibit 1	OCD Recommendations	73/74
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Exhibit 2	New Mexico AGI Well Activities	77/77
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Exhibit 3	Curriculum Vitae	70/72
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NO.	DESCRIPTION	ID/EVD
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Salt Creek:

Exhibit A	Case 23294 Extension Request	101/108
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Exhibit B	Case 23464 Extension Request	101/108
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Exhibit C	Salt Creek Presentation	103/108
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Exhibit D	Drafts of Notification Documents and Proof of Delivery	137/141
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1 P R O C E E D I N G S

2 CHAIRMAN FUGE: Meeting of the New
3 Mexico Oil Conservation Commission. Little after 9
4 a.m. We're doing it in a hybrid format. Folks are --
5 folks, including witnesses, are participating online.
6 Commissioner Bloom, reporting for the record -- it was
7 impossible for him to attend in person, so he is
8 participating telephonically. And with that, I'll do
9 a quick roll call.

10 Commissioner Bloom?

11 COMMISSIONER BLOOM: Present.

12 CHAIRMAN FUGE: Commissioner Ampomah?

13 COMMISSIONER AMPOMAH: Present.

14 CHAIRMAN FUGE: Okay. We're going to
15 move to the first item on the agenda, which is
16 approval for the agenda of this meeting, May 11, 2023.
17 Unless any of my fellow commissioners have any
18 additions or subtractions, I'm looking for a motion to
19 approve?

20 COMMISSIONER BLOOM: I so move.

21 CHAIRMAN FUGE: Any objection?

22 Otherwise, we'll let the record reflect the minutes of
23 the agenda was approved unanimously. In advance of
24 the meeting, the minutes from our April 13, 2023,
25 meeting were circulated. Are there any additions,

1 comments, from my fellow commissioners? If not, can I
2 get a motion to approve the minutes?

3 COMMISSIONER BLOOM: Mr. Chair, I so
4 move.

5 CHAIRMAN FUGE: Seeing no objection,
6 let the record reflect that the minutes were approved
7 unanimously. We're going to move to the first item on
8 the agenda, which is a report from the Oil
9 Conservation Division to the Commission concerning
10 division enforcement activities, and it's my
11 understanding that that presentation will be given by
12 Brandon Powell, Deputy Director Engineering and
13 Environmental, and Jesse Tremaine, Counsel --, that's
14 Counsel to the Oil Conservation Division.

15 Mr. Powell, Mr. Tremaine; are you
16 ready?

17 MR. TREMAINE: This is Jesse Tremaine
18 from the Oil Conservation Division. Mr. Chair, I am
19 ready, and Mr. Powell's attending by Webex.

20 CHAIRMAN FUGE: Mr. Tremaine, you can
21 bend that mic down to level. Yeah. Or you can use
22 the hand cone.

23 Mr. Powell, you should have the ability
24 to share.

25 MR. POWELL: Okay. Shared. Can you

1 see my presentation?

2 CHAIRMAN FUGE: Not yet.

3 MR. POWELL: One more button. Sorry
4 about that.

5 CHAIRMAN FUGE: There we go. We'll
6 make a copy of the slides available after the
7 presentation and the meetings being reported. We can
8 -- so both area available. There's an audio question,
9 so I'm going to pause for a second before you get
10 started and use the polycom here to hopefully connect
11 folks to the meeting to make it a little easier to
12 hear. Bear with me one second.

13 Okay. That's not going to help.
14 Everyone, we'll speak up, and please make sure you're
15 using the mics that are on -- I'll make sure the mics
16 are on up here at the dais.

17 Mr. Powell, turning it back over to
18 you.

19 MR. POWELL: Good morning, Chair and
20 commissioners. Thank you for having us. We put
21 together this slide based on comments that we
22 received. We thought -- felt it would be helpful to
23 provide a more general outline of OCD's authority, and
24 what we do and don't do. We will directly address
25 releases and enforcement actions as we move through

1 this presentation.

2 As we get through the presentation,
3 there'll be a few slides that Mr. Tremaine will
4 present and go through, and we'll make that movement
5 through and then take questions from the Commission as
6 you would like. As stated before, I'm Deputy Director
7 Brandon Powell. And we'll get started.

8 First thing I'd like to show is OCD's
9 authority to, according to the Act -- most of OCD's
10 authority comes from the Oil and Gas Act, although OCD
11 does have some responsibilities under the Water
12 Quality Act. OCD's primary charge under the Act is
13 prevention of waste and protection of correlative
14 rights.

15 Two of these items that are in the Act
16 are: Waste is prohibited, and then it describes the
17 types of waste as underground waste and as surface
18 waste. While surface waste is something that's
19 commonly understood because you can see it,
20 underground waste is also very important as OCD's
21 rules ensure minerals are produced properly, which
22 includes them being isolated from other formations
23 including freshwater formations.

24 Freshwater formations are detrimental
25 to production, as they can flood out the production or

1 have a negative impact on oil formations themselves.
2 This isolation in turn provides protection to the
3 groundwater formations.

4 So as you'll see through this
5 presentation, there are times when there's going to be
6 direct rule references that effect protection of both
7 the surface and the environment, and then there'll
8 also be indirect things that protect it.

9 Just an overview of the state and
10 jurisdictional overview, New Mexico has a very diverse
11 land and mineral ownership landscape. Production
12 occurs on the following mineral types. There's
13 federal lands, tribal lands, state lands, and private
14 lands. The map on the right shows the different land
15 ownerships in New Mexico. It's a very diverse state
16 as far as ownership.

17 For federal lands, OCD has concurrent
18 jurisdiction. That means OCD shares jurisdiction on
19 these wells with the BLM. For these wells, BLM
20 provides initial reviews and OCD performs the
21 subsequent review and approval. OCD can add
22 conditions, but they can't take away or conflict with
23 federal requirements.

24 For state or private wells, OCD has
25 sole jurisdiction for permitting and operation of the

1 well. That said, there may be lease conditions
2 imposed by the mineral owner or operations that are
3 not filed or enforced by the OCD.

4 OCD's operational responsibilities.
5 OCD is responsible for the safe implementation,
6 operation, and development of oil and gas facilities
7 in New Mexico. However, there's some common
8 misconceptions of what OCD does and doesn't do.

9 OCD does not manage mineral rights or
10 leases. Mineral rights are overseen by the mineral
11 owners. The decision to lease is theirs alone.
12 Private mineral rights are owned by private parties.
13 State mineral rights are leased by the state land
14 office. Federal mineral rights are leased by the
15 Bureau of Land Management.

16 OCD also does not regulate emissions.
17 That's the New Mexico Environment Department. OCD
18 does not provide protection and enforcements solely
19 through penalties and notices of violations. We have
20 several different enforcement tools that we'll get to
21 and show subsequently in this presentation.

22 Here's an example of what that means.
23 For illustrative purposes, OCD can be thought of like
24 a building inspector. Building inspectors don't own
25 the homes or create the plans. OCD doesn't own the

1 minerals or create plans of developments for the
2 operators. Homeowners must have the proper permits
3 for construction with all of the applicable
4 regulations. OCD requires operators to receive
5 permits for their facilities and establishes those
6 operational requirements.

7 Building inspectors don't dictate a
8 home's design, but they do ensure presented plans are
9 up to code. OCD ensures operators' plans are up to
10 code prior to drilling and during drilling and
11 subsequent production.

12 In summary, a building inspector
13 doesn't tell you if you can build a house on your
14 property; they just ensure that when you build it, the
15 house is safe. OCD doesn't provide operators with
16 mineral rights or leases; OCD ensures that these
17 property rights are developed safely and reasonably.

18 A really good example of that is, if
19 you don't build a house properly, the foundation can
20 crack, and it can be extremely detrimental to the
21 building. Similarly, if OCD ensures that wells are
22 constructed properly, so it's got casing integrity,
23 those kind of things, to make sure that resources and
24 the environment are protected.

25 Types of OCD's enforcement rules. This

1 is the things that OCD has that may be in excess of
2 just simple violations. OCD has approximately 200
3 pages of adopted rules through the OCC. Those rules
4 include things that protect -- directly and indirectly
5 protect safety and the environment.

6 Those can be things such as separation
7 of strata, that we talked about previously, where it
8 doesn't allow fluids to flow from one formation to
9 another.

10 Submission requirements. OCD currently
11 has 123 form types, which include notice of intent to
12 perform work, subsequent reports, or providing
13 information; all of which help inform our oversight
14 of operations.

15 Operational requirements. OCD has
16 numerous rules that have general operational
17 requirements. These come with actions, like how an
18 operator must respond to a release; the shape an
19 operator must keep their equipment in; situations
20 where they're allowed to vent or flare; how they've
21 come to conduct specific tests to demonstrate well
22 integrity, both internally and on an -- or, initially
23 and on an ongoing basis. How they are allowed to
24 transport product or waste.

25 Then we also have field compliances.

1 OCD inspectors issue field compliances for rule
2 compliance issues they discover during inspections of
3 well sites and facilities.

4 Response requirements. OCD has various
5 authorities to collect information from operators,
6 both within and outside the enforcement context.

7 And then the enforcement rules
8 themselves, which can be a mix of the following.
9 Penalties, not allowing permits, revoking
10 authorizations to transport, and requiring wells to be
11 plugged and facilities to be reclaimed.

12 Enforcement information using 2022
13 statistics. This, again, gives a general overview of
14 the items the OCD sees within a given year. In 2022,
15 OCD received 105,000 records -- application records.
16 This doesn't include production reports.

17 OCD rejected a little over 6,000 of
18 these individual applications. OCD approved 91,000
19 applications, but it should be noted, 46,000 of these
20 were auto-approved as they were informational records
21 only. 6300 were subject to OCD hearing. 52,000 of
22 these applications were handled directly by OCD
23 personnel.

24 Of the applications that were handled
25 directly by OCD personnel, they added 40,000

1 conditions of approval on these requests. These type
2 of front-end actions are encouraged to ensure
3 compliance up front, in terms of the project design,
4 construction, and implementation.

5 I just want to emphasize those 40,000
6 conditions of approval just a moment longer. Those
7 conditions can include items that protect not only the
8 well, but also the environment. They include things
9 like ensuring proper testing of the well; they include
10 things such as notice to the OCD, and also ensuring
11 the casing design is protecting or isolating certain
12 zones or the surface.

13 Inspection and field compliance stats.
14 OCD performs roughly 31,000 inspections annually. Our
15 goal is to hit every site at least once every three
16 years. Last year, as a result of those inspections,
17 OCD issued 2500 field compliances. To date, operators
18 have taken 1700 actions to close the required
19 compliances.

20 The remaining compliances, those that
21 are still open, require additional actions by the
22 operators. Failure to address open compliances can
23 result in subsequent enforcement. Field compliances
24 can include items such as sign issues, contamination
25 discovered and remediation on site, required or

1 missing integrity testing.

2 Failure to address or respond to issued
3 field compliances can result in additional enforcement
4 action. If inspections uncover more serious issues,
5 additional enforcement may be pursued beyond field
6 compliances.

7 At this point, I'm going to turn it
8 over to Mr. Tremaine to go through the next few
9 slides.

10 MR. TREMAINE: Thank you, Mr. Powell.
11 Chair and commissioners, my task is to provide you
12 with an update of the next few slides for the general
13 -- authority -- notice of violation and --, and the
14 actions that they --

15 UNIDENTIFIED SPEAKER: Mr. Chair,
16 excuse me. Mr. Tremaine, I'm having a hard time
17 hearing you. Perhaps if you moved the microphone
18 closer, please? Thanks.

19 MR. TREMAINE: This better, --?

20 UNIDENTIFIED SPEAKER: That is better.
21 Thank you so much, Mr. Tremaine.

22 MR. TREMAINE: So, as a brief
23 background, the Oil Conservation Division did
24 historically have -- However, that healthy authority
25 was lost as a result of the -- energy -- case back in

1 2009. The -- stated the civil penalty authority for
2 the Oil Conservation Division in 2019 as part of the
3 Water Act. As a result of that legislation, the OCD
4 was tasked with and -- the necessary updates to
5 Division rules, and -- complicated updates to 19-15-5-
6 10 -- Division enforcement rule. Those rules became
7 effective on February 25th, 2020, and so, since that
8 date, OCD has -- process and procedure on order to --
9 to issue -- and assess facilities.

10 Since that date, the Division -- 75
11 separate -- violation. In total, those NLVs -- over
12 11.4 billion dollars in civil penalties, and to date,
13 -- those which have been resolved at assessed a little
14 over 3.5 million in civil penalties. Other than --
15 civil penalties refer to the general public. I want
16 to make a note here that, you know, OCD tracks, and my
17 job is to track, planned, pending, and resultant --
18 basis.

19 So any point in time, if you ask me
20 next week, these numbers are going to have changed, --
21 different because -- NLVs, so this isn't a good
22 target, but it's a snapshot of when I -- this slide.

23 According to rule, settlements that
24 resolve NLVs are called "stipulated final orders."
25 Those stipulated final orders, in addition to

1 resolving civil penalties, typically include some
2 combination of civil penalties, stipulated penalties
3 for future violations, particularly related or similar
4 violations.

5 UNIDENTIFIED SPEAKER: Mr. Chairman,
6 I'm sorry. I just noticed in the chat that some of
7 the people online are having a hard time hearing. I'm
8 also picking up some background noise, it sounds like
9 cutlery or something. I don't know if we can mute
10 other microphones. The audio improved for a second
11 there, and then it has kind of downgraded, it sounds a
12 little boom-y and distant. Thanks.

13 MR. TREMAINE: I can't shut off one mic
14 or the other. But what I can do is shut off and pick
15 up there and bring it into the --. That was causing
16 the echo before, but it was inconsistently picking it
17 up.

18 UNIDENTIFIED SPEAKER: Jesse, can you
19 dial --

20 CHAIRMAN FUGE: Bear with us for just
21 one second.

22 (Off the record.)

23 MR. POWELL: So I'll start at the top
24 of the slide. OCD lost its civil authority for --
25 civil penalty authority for an extended period as part

1 of the Marbob Energy versus New Mexico Oil
2 Conservation case. This authority was reinstated in
3 2019 as part of the Produced Water Act.

4 OCD sponsored necessary updates to the
5 rules -- the division's enforcement rule, which is
6 adopted by the commission effective February 25th,
7 2020. Since that date, OCD has formally issued 75
8 notices of violation, in which -- and a total proposed
9 over 11 million in civil penalties and which, to date,
10 assessed over 3.5 million in civil penalties.

11 As Jesse mentioned and I'm not sure
12 everybody heard, this is a certain snapshot in time.
13 This could change tomorrow, as these enforcement
14 actions and penalties are an ever-moving target and
15 continue to progress. Settlements resolving NLVs,
16 which are stipulated final orders, include some
17 combination of stipulated penalties for future
18 violations, prospective compliance actions, additional
19 reporting requirements, and specific limitations on
20 operators' future activities.

21 This ensures that not only are their
22 current actions addressed, but any future actions are
23 also addressed. 26 NLVs are currently pending an
24 informal resolution or hearing, which proposed 5.1
25 million in civil penalties.

1 Our annual report to legislature of
2 FY22 penalty enforcement is available at the link
3 below. Prior OCD penalty -- I apologize. Prior OCD
4 penalty reports can be found here.

5 OCD tracks planned, pending, and
6 resolved NLVs on a rolling basis. Again, these
7 numbers can be subject to change. In FY22, July 1st,
8 2021, through June 30th, 2022, OCD issued 36 NLVs,
9 proposing over 6 million in civil penalties covering
10 multiple violation types. Waste rule, inactive wells,
11 deficient FA, operating without approval; amongst
12 other things.

13 OCD resolved 19 NLVs during this fiscal
14 year, collecting over one million in civil penalties,
15 in addition to binding commitments from operators to
16 promptly resolve the issues for which they are cited.

17 In fiscal year 2023, which is July 1st,
18 2022, to June 30th, 2023, OCD has so far issued 11
19 NLVs seeking over 4.3 million in civil penalties.

20 They address the following violation types:

21 Impermissible routine venting and flaring, unreported
22 and/or unremediated releases, operation of an
23 unpermitted SWD, improper flare operations, inactive
24 wells.

25 OCD resolved 12 NLVs and two

1 significant self-disclosed violations. These NLVs
2 sought over 2.5 million and ultimately assessed over 2
3 million in penalties, in addition to binding
4 commitments to resolve the issues.

5 Enforcement priorities. OCD tracks
6 NLVs according to several priority categories. NLVs
7 include multiple violations and violation types. OCD
8 categorizes these NLVs according to their primary
9 violations. Waste rule violations, which we have 8
10 NLVs seeking a little over two million in civil
11 penalties; environmental conditions and hazards, we
12 issued 8 NLVs seeking a little over two million in
13 civil penalties.

14 High priority operational issues, which
15 include significant reporting violations, we issued 25
16 NLVs seeking 4.4 million in civil penalties. This
17 category includes failure to -- quarterly or monthly
18 report waste rules, production reports, or various
19 critical drilling completion or plugging reports.

20 Unpermitted activities, which were five
21 NLVs, seeking over two million in civil penalties.
22 Inactive wells, which were 28 NLVs, seeking a little
23 over 700,000 in civil penalties, and the plugging of
24 hundreds of inactive wells.

25 Going forward, OCD intends to provide

1 more frequent status updates on pending and resolved
2 NLVs on its website.

3 Now, moving into the spill information.
4 Again, we're going to continue using 2022 information,
5 but this will be the calendar year information. In
6 2022, OCD received reports of 1476 incidents. Of
7 those, 642 are currently in closed status. 834 are in
8 a closure non-approved status.

9 In 2022, OCD received 3652 C141s for
10 releases -- for current and historical releases. Of
11 those, OCD approved 3195 individual C141s. These were
12 a mix of current and historical releases. OCD
13 rejected 652 individual applications. Rejections
14 could be for various reasons, but can include
15 insufficient information provided, insufficient work
16 performed, additional work being required.

17 Behind the scenes, OCD is also working
18 to improve incidents' reporting status online, so the
19 incident records can more accurately reflect the
20 status of the incidents and what requirements still
21 need to be addressed.

22 I just want to go back -- the 652
23 individual rejections, to explain what that requires.
24 That requires an operator to take additional actions
25 and then file subsequent reports. So we get those

1 actions and make sure they're current and comply with
2 the rules.

3 Now we're going to go through some LFC
4 reporting metrics that the OCD has, the number of
5 inspections that belong to S wells [ph] and associated
6 facilities. Again, as previously stated, our target's
7 31,000 per year. These are prior years, and this is
8 our quarterly for this year as we work through it.

9 Number of abandoned wells properly
10 plugged. I will state, due to the federal
11 infrastructure grant, the FY23 target is expected to
12 be exceeded substantially. Our target is typically 50
13 per year, based on funding. Our prior two years, we
14 were right at roughly that 50. This year, we're on
15 track to greatly exceed that.

16 Number of violations issued. As
17 previously stated, these are referred to as field
18 compliances with required actions. And these are how
19 they've stacked up in prior years.

20 And that concludes the presentation.

21 CHAIRMAN FUGE: I'm going to allow a
22 little time for questions, but I want to take a pause
23 here for ten minutes to see if we can just improve the
24 audio situation for folks online with a little
25 restructuring. So if folks could reconvene at 9:45,

1 we'll come back in while we do a little restructuring
2 to improve the audio.

3 (Off the record.)

4 CHAIRMAN FUGE: All right. We are
5 resuming at 9:45. Thank you. For folks who were
6 pinging about audio issues, we reconfigured how we are
7 connecting to audio for the meeting. Hopefully that
8 has improved sound quality. We also had to reposition
9 some tech, so again, please keep, you know, letting us
10 know. I am monitoring the chat for issues.

11 OCD just concluded their presentation.
12 I am going to open it up initially for some questions
13 by commissioners, and I will have a 30-minute public
14 comment period where folks can, you know, provide
15 comments.

16 There are people in the room and people
17 online, so I ask that you keep your comments to about
18 two minutes so that we can move through it, but I'm
19 also working through the overall agenda and the
20 adjudications we also have on the calendar for today.
21 And I will not start the 30 minutes until the
22 commissioners have concluded their questions.

23 And with that, I'll turn it over to
24 Commissioner Bloom and Commissioner Ampomah if they
25 have any questions.

1 COMMISSIONER BLOOM: Mr. Chairman,
2 thank you. Yes, a couple questions. Mr. Powell, if
3 you could go back to the slide with the discussion of
4 the C-141? I just had a couple questions there and
5 thought we could clarify some things for people that
6 are in attendance.

7 MR. POWELL: Sure. Let me get that
8 pulled back up.

9 COMMISSIONER BLOOM: I know you all
10 work with these matters every day, they're a little
11 bit more foreign to me. I think folks know I
12 represent the land office, so it's not so much part of
13 our responsibilities. Of course, we do collaborate on
14 many of these things.

15 MR. POWELL: Commissioner Bloom, can
16 you see it now?

17 COMMISSIONER BLOOM: Perfect, thank
18 you. That's great. Thank you. My understanding of
19 the C-141 is if there's a spill, operator notifies
20 you, and then would tell you what steps they took to
21 remediate the situation.

22 So perhaps there's a Produced Water
23 spill, vacuum truck goes out, vacuums up any liquids
24 on the surface, someone else comes out and digs out
25 contaminated soil and takes that to a disposal site.

1 And then my question for you is, is the
2 next step that they would then ask you if that's
3 enough work, and if it's been done properly, and then
4 you would approve it, and if not you reject it and
5 then hit them with more requirements?

6 MR. POWELL: Yeah. That's a good
7 overview. There's some details in between where
8 there's a corrective action plan that's, at times,
9 filed with the OCD where we approve their corrective
10 action plan. The closure requirements are actually
11 defined by rule, as far as what they need to meet for
12 individual spills. The only time they would ask for
13 our approval for how they close is if they're asking
14 for exceptions to that rule. So what they'll do is
15 they'll take the necessary steps as they go through,
16 and then file that final C-141 with all of the
17 sampling, all of the closure --

18 COMMISSIONER BLOOM: Mr. Powell froze
19 there, or perhaps I did.

20 MR. POWELL: Can you hear me okay now?

21 CHAIRMAN FUGE: Looks like Mr. Powell
22 froze. Just give him a second.

23 MR. POWELL: I can hear you all; can
24 you hear me?

25 COMMISSIONER BLOOM: Yeah, you sound

1 good now. Yes.

2 MR. POWELL: Okay. Sorry about that.
3 So what we do when we review is we review all of the
4 operator's proposed action -- or the actions that they
5 took to make sure that it met the rule requirements or
6 their corrective action plan that they had approved.

7 If it met it, then we approved that
8 remediation portion. If it doesn't meet those
9 requirements, then we would reject it with additional
10 comments or requirements for the operator to take.

11 COMMISSIONER BLOOM: And then I don't
12 know if this question is properly addressed to you,
13 Mr. Powell, but if you want to hand it off to someone
14 else in attendance, that would be fine. Forward
15 looking, I think I heard that the OCD has received
16 some additional FTEs or full-time employees in the
17 future for enforcement-type work or inspection-type
18 work? I don't know if that's true. Perhaps you could
19 address that?

20 And then, even if not, sort of, like,
21 what do you see happening in the future in terms of
22 enforcement? Because it seems like, in many ways,
23 that you're trying to up your work levels here, and
24 seeking to engage on some of these things.

25 MR. POWELL: So I'll really high-level

1 hit it, because legislation just granted those
2 positions, all of that, that's still in planning as
3 far as getting that in place. We are -- OCD is
4 looking at additional field inspectors, additional
5 positions.

6 As always, OCD does a lot with the
7 positions it has, so we're always looking at where we
8 can increase our enforcement capabilities, where we
9 can increase our review processes, where we can take
10 those actions. So that's always something that we
11 look at, is we look at those roles, look at our
12 responsibilities, and try to create additional
13 actions in the future.

14 COMMISSIONER BLOOM: Okay. Thank you.

15 MR. POWELL: I apologize. Also, there
16 was contract money that OCD did receive, and part of
17 that contract money is earmarked for enforcement. So
18 we'll be looking at what contracts we can put in place
19 for that as well.

20 COMMISSIONER BLOOM: Excellent. Thank
21 you, Mr. Powell.

22 Mr. Chairman, no further questions at
23 this time. Thanks.

24 MR. POWELL: Thank you, Commissioner
25 Bloom.

1 COMMISSIONER AMPOMAH: Commissioner
2 Ampomah. Mr. Chair, I do have some few questions --.
3 So I want to know if there are repeat violators --

4 COMMISSIONER BLOOM: Dr. Ampomah --
5 Mr. Chair, I'm sorry -- Dr. Ampomah, I'm having a hard
6 time hearing you. I don't know if you could get
7 closer to the microphone, or if there might be another
8 issue.

9 COMMISSIONER AMPOMAH: Is that better?
10 Can you hear me now?

11 COMMISSIONER BLOOM: Yeah, that sounds
12 better. Keep going and we'll let you know. Thanks.

13 COMMISSIONER AMPOMAH: Okay. So I just
14 wanted to know if there are, like, repeat violators on
15 specific -- and how the OCD handles that.

16 COMMISSIONER BLOOM: I'm sorry, I
17 couldn't hear that.

18 MR. TREMAINE: I think I can repeat the
19 question, Commissioner Bloom. Commissioner Ampomah
20 asked if there were examples of repeat offenders for
21 particular violations or incidents and how the
22 division handles that.

23 Commissioner Ampomah, I'm not prepared
24 to give you specific examples. I can say that
25 anecdotally, yes, there may be repeat offenders. And

1 there is a specific structure and rules and civil
2 penalty policy and guidance that OCD has issued that
3 allows OCD to consider repeat violations, particularly
4 established violations. And that increases the
5 maximum penalty -- not the total maximum per
6 violation, but the aggravating factors of a particular
7 violation.

8 So for instance, if there were a \$1,000
9 daily civil penalty for a particular violation and an
10 operator has a prior history, depending on what that
11 history looks like, that would go from 1,000 to 1200
12 or 1400, just -- those are not set in stone examples,
13 but there are escalators, and actually, the civil
14 penalty guidance outlines a number of other
15 aggravating and mitigating factors that compute into
16 the civil penalty guidance. So it's something that
17 OCD looks at, but I am not able to and hesitant to
18 point to specific operators that may be in that
19 situation.

20 COMMISSIONER BLOOM: I would add to
21 that, Mr. Tremaine, the NLVs -- the stipulated final
22 orders that we issue; there are stipulations in those
23 as well, where if an operator that receives an NLV and
24 gets a final order, we do write in stipulated final
25 orders where if they continue to have similar

1 violations, then we can take actions through that as
2 well.

3 MR. TREMAINE: And those stipulated
4 penalties are assessed administratively; they're not
5 -- they do not result in additional administrative
6 process, so it's simply a demand issued after the
7 stipulated final order and a continued violation
8 occurs to the operator, and then they pay the
9 stipulated penalty. Those typically occur for a
10 period of time, depending on the situation, so 12 to
11 18 months.

12 CHAIRMAN FUGE: Mr. Tremaine or
13 Mr. Powell, about how long would you say it goes from
14 NLV issuance to resolution?

15 MR. TREMAINE: Mr. Chair, it does
16 depend. For instance, a number of the inactive well
17 NLVs typically take 90 to 180 days to resolve.
18 Depends on if they go to hearing or not. But the rule
19 set, I would say, anywhere from 60 to 120 is pretty
20 normal. We do have some that have extended longer
21 than that due to complexity, ongoing negotiations, and
22 mediolar [ph] compliance actions that are being taken
23 by the operators, so some of them can extend quite
24 long.

25 But on average, I would say it's in the

1 three-to-six-month range.

2 CHAIRMAN FUGE: Thank you. No further
3 questions from me. Seeing no other questions from the
4 commissioners, I'm going to open it up for 30 minutes
5 of public comments. Again, you know, please leave
6 your comments to about two minutes. If you're online
7 and want to send it to the chat, pick it up or raise
8 your hand; I will keep an eye out for that. And we
9 will go from there.

10 Ms. Troutman?

11 MS. TROUTMAN: Hello, everyone, and
12 thank you. Can you hear me okay?

13 CHAIRMAN FUGE: You're clear.

14 MS. TROUTMAN: Awesome. Well, I'm
15 Melissa Troutman, I'm the climate and energy advocate
16 for WildEarth Guardians. I just wanted to give a
17 little background on the spill rule. In 2021,
18 Guardians and OCD worked together on this rule to
19 prohibit unauthorized releases of oil, gases, produced
20 water, oil-filled waste, and other contaminants.

21 Initially, Guardians proposed a rule
22 focused on produced water, and OCD actually
23 strengthened it to include oil, gases, and other
24 wastes. And this rule is necessary because, as OCD's
25 Jim Griswold stated in his testimony at the time, that

1 spills pose potential threats to public and
2 environmental health, can cause soil and groundwater
3 contamination -- we all know this.

4 But, you know, after hearing OCD's
5 presentation on enforcement today, I got to say, we're
6 really disappointed. You know, since the OCC
7 unanimously voted to approve the spill prohibition
8 that we jointly proposed with OCD, we've been waiting
9 for the agency to use its new enforcement authority to
10 reign in the rampant pollution from spills across the
11 state.

12 But instead, OCD is undermining the
13 spirit of compromise that led to the adoption of that
14 rule in the first place by only issuing a handful of
15 violations for reporting issues and remediation
16 issues, and issuing zero penalties for actual spills
17 in the 20 months since the rule became effective in
18 August 2021.

19 And since then, operators have reported
20 a record-setting number of spills. In 2022, the
21 volume of contaminants spilled increased by 16 percent
22 over the previous year. I just want to pause there.
23 This is record-setting spills and volumes of
24 contaminants in 2022. So if the aim is operator
25 compliance, clearly what OCD's doing isn't working

1 because the problem's getting worse.

2 And this is, of course, not the result
3 we expected after creating stronger rules which were
4 meant to decrease spills, not increase them. And to
5 be honest, what this looks like is that OCD has pulled
6 one over on the people of New Mexico, agreeing to a
7 rule to prohibit spills that it never intended to
8 enforce. I mean, what good is a spill prohibition, or
9 hundreds of pages of rules for that matter, if the
10 agency can't or won't get operators into compliance?

11 And while we can empathize with the
12 division's lack of staff and resources, it only took
13 us all of 15 minutes using OCD's database to aggregate
14 a list of the top 10 spillers. And this is to
15 Commissioner Paloma's [sic] question about repeat
16 offenders earlier.

17 Yes. There are repeat offenders. And
18 it doesn't take long to use the data OCD already has
19 to create a list of those top 10 repeat offenders,
20 none of which have received penalties or violations
21 for their repeated behavior. And so we're just kind
22 of baffled. You know?

23 If staff time is really the only
24 barrier to enforcing the spill rule and to decreasing
25 spills instead of letting them continue to increase,

1 then we would like to know exactly what OCD needs to
2 properly enforce this law, in terms of time, staffing,
3 funding. And if there's another barrier outside of
4 staffing and resources, we need to know that too.

5 That's all. Thank you.

6 CHAIRMAN FUGE: Not seeing anyone in
7 the room, I will go to Ms. Brent. You're still muted.

8 MS. BRENT: Okay. There we go. So I'm
9 kind of new to all this. I didn't know the ins and
10 outs of the regulatory agencies, but my question is:
11 Do our tax dollars pay for OCD, for this agency? It's
12 a serious question. Who pays for this agency? The
13 gas companies or us?

14 CHAIRMAN FUGE: As a state agency of
15 New Mexico, the New Mexico Oil Conservation Commission
16 is funded by tax revenue, which comes from a variety
17 of sources.

18 MS. BRENT: Thank you.

19 CHAIRMAN FUGE: For folks in attendance
20 in the room, if you would like to speak, all I would
21 ask is you come up to the lectern there, so you can
22 use the polycom phone there to be heard online.

23 If you're not muted and not planning to
24 speak, can you please mute yourself? I am looking
25 down the line and will mute/unmute a caller, but I

1 also don't want to mute the polycom device
2 inadvertently, so. Pardon the interruption.

3 MS. JENKINS: Is this working?
4 Everyone online can hear me?

5 CHAIRMAN FUGE: Yes, thank you.

6 MS. JENKINS: Okay. Hi. My name is
7 Sophia Jenkins Nieto, I'm a representative of Yucca.
8 We're the ones that originally asked all the questions
9 that led to this presentation. So we appreciate the
10 report, and we thank the OCD for providing the
11 information, and we thank the Commission for asking
12 for accountability on the enforcement of the rules --
13 by the Commission. So we appreciate everything that
14 the OCD does and thank you for the overview.

15 Given that the OCD has received 1,476
16 incident reports for spills in 2022, I want to know
17 why there's only eight NLVs and what's happening with
18 the remaining spills. And we're still wondering, how
19 does the Agency answer for its failure to assess
20 penalties for the remaining infractions?

21 We understand that there's been an
22 average of four spills per day. And as has been said,
23 the lack of enforcement is actually allowing for
24 spills to increase by 16 percent. And it appears that
25 the OCD is not really working to prohibit spills.

1 So I'm also just a little concerned
2 that a lot of our questions -- we had a very long list
3 of questions -- were kind of not answered or were
4 vaguely answered. I -- personally, this whole process
5 is really new to me, and all of our members are youth
6 from across the state, and a lot of the language is
7 really new to us, so I would just appreciate some more
8 clarity on the questions that we asked. So yeah.
9 Thank you.

10 UNIDENTIFIED SPEAKER: You want to
11 share with them --

12 MS. JENKINS: Yeah. The questions.
13 The questions -- so yeah. We thank you for asking one
14 of our original questions about repeat violators.
15 This is extremely relevant information; we're kind of
16 disappointed that there wasn't really an answer; like
17 I said, it was kind of vague.

18 Why are repeat offenders not being
19 penalized? And according to the rules and penalty
20 calculation method, remediation plans are a way to
21 address the impact of spills, but they don't seem to
22 be doing anything to prevent spills in the first
23 place. And I'm wondering if that's saying that
24 there's no consequence or penalty for spills, even if
25 that was the intention of the rule, which is really

1 upsetting.

2 Our organization helped to create the
3 rule, and the prohibition of spills means that when
4 spills happen, there needs to be consequences. For
5 example, one of the original questions was, why are
6 violations that cite regular operations as the cause
7 not being addressed?

8 Is it illegal to spill, therefore any
9 company whose regular operations are leading to spills
10 should be required to change their practices? So
11 we're just kind of wondering, what's the plan to
12 actually enforce these rules?

13 I think that was all of the questions.
14 Yeah. Thank you.

15 CHAIRMAN FUGE: Thank you.

16 MX. GRANT: Hi. Can you hear me okay?

17 CHAIRMAN FUGE: Yup. And you're
18 showing up -- and you're projecting out in the room --
19 on the video feed.

20 MX. GRANT: Great. Thank you.

21 Good morning. My name is Soni Grant.
22 I'm a campaigner with the Climate Law Institute at the
23 Center for Biological Diversity. Thanks for the
24 opportunity to speak, and to the Commission for
25 providing this report.

1 As we've just heard today, there is,
2 you know, over 1400 spills this past year in 2022.
3 That amounts to an average of four spills of toxic
4 liquid waste every single day in New Mexico. And I
5 hope that the Commission -- Division recognize this as
6 an incredible pollution crisis in our state that you
7 have a responsibility to address. And that issuing
8 violations for late reporting of spills -- only eight
9 since you've had that authority is not sufficient to
10 help prevent those spills.

11 We, in tracking the amount of spills
12 that have occurred since the spill rule's been in
13 place, have also just noticed that there are some
14 problems in how that information is collected from
15 operators. Operators have a lot of discretion in
16 terms of being able to indicate "other" for the cause
17 of their release or the material that's been spilled.

18 And this poses a huge problem both
19 because you, as a regulating agency, don't always know
20 what's been spilled, and members of the public don't
21 know what's been released into their environment. And
22 so I really urge you to do more to gather better data,
23 analyze it more quickly, and present that to the
24 public in a way that they can understand.

25 Lastly, I just wanted to remind you

1 that as a state agency, you have a constitutional duty
2 to guarantee New Mexico's beautiful and healthful
3 environment, to control pollution, to protect -- to
4 prevent the despoilment of New Mexico's air, water,
5 and other natural resources; and that by failing to
6 enforce this rule that you have in the books, you are
7 in violation of that constitutional duty.

8 So I really hope that we can work
9 together with OCD to, you know, enforce this rule
10 that's on the books, to stop spills and address this
11 pollution crisis. Thank you.

12 MS. R: My name is Mary R. I was born
13 in Roswell, I'm a fourth-generation New Mexican with
14 friends in Lovington and Carlsbad and Hobbs, and I
15 know that southeastern New Mexico now more resembles
16 Mordor, from the Lord of the Rings, than it does the
17 plains of my childhood. And I think it's clear that
18 financial penalties do not work.

19 I mean, oil companies are making
20 trillions of dollars around the world, certainly
21 millions in the Permian Basin, and corporations are
22 made up of persons. And I think that until there is a
23 personal liability, until these spills are considered
24 crimes -- which it seems clear to me they are.

25 They're crimes against my three-year-

1 old granddaughter. They're crimes against the people
2 who live in the Permian Basin and really, all of us,
3 because they're accelerating climate crisis.

4 So I would like to see you propose to
5 the legislature that there be an additional penalty,
6 which would be a personal liability, not a fine.

7 Thank you.

8 CHAIRMAN FUGE: Anyone else in the room
9 or online? Monitoring for --

10 MS. SHERA: Yes. This is Katherine;
11 can you hear me?

12 CHAIRMAN FUGE: Yes. Ms. Shera, I've
13 got one person in the room and then I will go to you.
14 Sorry I missed your hand up; I just didn't scroll far
15 enough down.

16 MS. SHERA: Thank you.

17 MS. AKRAMEN: Okay. So my name is
18 Ellen Akramen [ph] and I'm a supporter of the Yucca
19 and other climate crisis organizations, and I just
20 want to say that it seems to me that these fines are
21 so low that they are just the cost of doing business
22 for these corporations. And there doesn't really seem
23 to be any teeth in the enforcement, especially
24 considering that the number of spills has increased.

25 So I don't know what the solution is,

1 but I think that it might be looking at the licenses
2 of these corporations for what they're doing. But
3 there definitely needs to be more teeth in the
4 enforcement situation. Because nothing's changed,
5 really. The pollution has gotten worse. And that's a
6 serious concern.

7 CHAIRMAN FUGE: Thank you.

8 Ms. Shera? Please go ahead.

9 MS. SHERA: Thank you.

10 Hi. My name is Katherine Shera, and
11 I'm a resident of Santa Fe. Thank you for the
12 opportunity to speak and for providing this public
13 forum. Director Powell mentioned during his
14 presentation that the department's goal is to visit
15 every site in the state at least once every three
16 years. Clearly, significant harm to the environment
17 and public health can occur during the interim.

18 Given that the department recognizes
19 the need to increase enforcement capability, I'm just
20 wondering, is there a mechanism for citizens to report
21 suspected violations to the department? And if not,
22 would you be willing to create one? Thank you.

23 MR. TREMAINE: I can answer that
24 question quickly. We do currently receive reports
25 from citizens and third parties about potential issues

1 that they observe, and those are investigated and
2 dealt with depending on how the circumstances, you
3 know, warrant.

4 We were just out at a release the other
5 day that was not oilfield related, but dealing with a
6 waste water system. Not even oilfield related.
7 Municipal waste water system. So we do respond to
8 those reports.

9 CHAIRMAN FUGE: Any other questions in
10 the room? Or online?

11 MS. SOPOCI-BELKNAP: Thank you,
12 Chairman, commissioners. My name is Bianca
13 Sopoci-Belknap. I work for Earth Care, we're the mama
14 organization that has the honor of hosting Yucca. I
15 wanted to ask a couple of questions, but first, I
16 actually had a couple of really direct questions about
17 process, if you wouldn't mind, Chairman.

18 I'm wondering -- I really appreciate
19 that you just answered directly to something that a
20 commenter asked. We still have OCD in the room.
21 There've been several questions posed that have been
22 unanswered from the original request. I'm just
23 wondering if you could clarify for us the process.
24 Like, is OCD going to respond or will the Commission
25 respond, like you just did to that question?

1 MR. TREMAINE: I think on some of the
2 more detailed questions, we're making note of them and
3 -- not prepared to answer them sort of up here, in
4 terms of how the T-141 process works and other things
5 like that. But as was mentioned on one of the slides,
6 and I'm speaking -- the director here, you know, our
7 intent in the near term is to start providing more
8 regular updates about sort of enforcement activity,
9 and a little bit more wholesale look at those
10 enforcement activities; not just NLVs, field
11 compliances, other things like that. And possibly
12 some explainers about how some of the process works
13 from our perspective, sort of under the applicable
14 rules.

15 MS. SOPOCI-BELKNAP: Okay.

16 MR. TREMAINE: So I'm taking note of
17 the questions, OCD team members on the call are taking
18 note of the questions and are thinking about that as
19 we provide more regular information about those
20 activities and efforts.

21 MS. SOPOCI-BELKNAP: Okay. Thank you
22 so much for that. That's helpful. I'm asking in part
23 because, you know, the way that this request came
24 about was folks were looking at the website and trying
25 to understand just the prevalence of spills continuing

1 to happen, the increase in spills from the previous
2 year, and then looking to the rules and wondering,
3 what is the meaning of these rules when there is not
4 enforcement?

5 And we just heard in the report that
6 there have been eight, you know, NLVs out of the over
7 1400 incidents. And so what we're feeling, I think,
8 is a lack of response to the question of why are there
9 only that many? It's not even a majority that haven't
10 been addressed; it's, like, by just such a huge
11 proportion.

12 So I guess it feels a little bit like
13 there was a request made in earnest, like in an effort
14 to say, "What does the agency not have; what are the
15 limitations here; how do we understand that as, you
16 know, New Mexican residents, as voters, as people who
17 are active in the legislative process and the
18 rulemaking process; what needs to happen to have rules
19 on the books have meaning?"

20 And again, when we haven't even had the
21 1400 remaining spills that don't have NLVs addressed,
22 and we have no answer for that, while we appreciate
23 creating the space in the conversation, it feels like
24 we're not actually having that conversation. So
25 that's what I'm struggling with, and then maybe this

1 will be a good segue, but that the Commission could
2 answer.

3 Which is, you know, initially, the
4 conversations between Yucca and the Commission were
5 important around authority because you all clarified
6 that you don't have, like, oversight over the OCD,
7 although it's -- you wear two hats, right? You are
8 literally the Director now; congratulations; and also
9 a commissioner. So that's a little fuzzy, but
10 nonetheless, you explained, the Commission promulgates
11 the rules, and then it's the Division's responsibility
12 to enforce those rules.

13 As the Commission, I'm just wondering,
14 what does it mean to you to have promulgated rules
15 that you are hearing now are literally not being
16 enforced at all? I'm just wondering because I feel
17 like, again, our question is, how can we help you?
18 How can we help you -- what do we need to do? Is it
19 subsequent rulemaking? That feels hollow to us when
20 we have rules that aren't currently being enforced.
21 So it's confusing. It's confusing, as Sophia
22 expressed.

23 So if you could give any clarification
24 as a commission, in terms of what the meaning of
25 rulemaking is for you, and the process, then, of

1 seeing the enforcement not only not happen, but the
2 increases in spills even while you have rules on the
3 books. Thanks.

4 CHAIRMAN FUGE: So I'll offer a couple
5 of observations while just noting and clarifying the
6 Commission's role. The Commission does establish the
7 rules of operation, and, you know, has oversight
8 responsibilities over the OCD. It is also the
9 administrative appellate body for the Division.

10 So if you -- if Mr. Tremaine brings an
11 individual enforcement case, it is subject to a whole
12 process largely set by statute. If a party who is
13 subject to enforcement is unhappy with the result, the
14 Commission is who you appeal to, which is part of the
15 reason why the Commission could not do individual
16 enforcement. So just sort of laying out roles and
17 other pieces. I would clarify, because I think it's
18 fair, and like I said in the chat, we will be making
19 the slides available on the OCD Compliance site.

20 It's not just eight, it'll be -- that
21 was a summary of more recent NLVs and actions.
22 There's actually been 75 since we got our enforcement
23 authority restored. And I would not necessarily look
24 at it as just NLVs, the field compliances are a
25 substantial part of how the OCD regulates activities

1 in the field.

2 And of the 1400 spills, I would also
3 note, it was in the slides, 675 of them were responded
4 to and closed up as required by the OCD's rule in a
5 timely manner within the window that we pulled the
6 data, and others are in the process of being closed.

7 And so we are also working on some IT
8 updates so it is easier to translate where in the
9 process a specific site is. And again, all that
10 information was on the slide decks that were
11 presented, but I just want to flag that for you. And
12 it will be available online, maybe not today, but
13 certainly by the end of the week.

14 Any other questions in the room or
15 online? We have a couple more minutes. All right.
16 And I see one person who just raised their hand
17 online. We will get to you next.

18 MS. WEST: Good morning. My name's
19 Elizabeth West, and I live in Santa Fe and I'm very
20 glad to be here. Bit by bit, I'm just a layperson in
21 all this, and probably a good example of people who
22 are vaguely interested, growing more interested, and
23 surprisingly, becoming somewhat more frustrated.

24 And I was thinking about train wrecks.
25 We could talk about a problem that's immediate and

1 fast, and that's a train wreck. And nobody likes
2 that. That's happened in the Midwest, and it's gotten
3 a lot of publicity. What I'm seeing here is a slow-
4 motion train wreck in New Mexico, having to do with
5 the environment.

6 And what you guys are doing -- thank
7 you, you people, sorry. I really appreciate the
8 opportunity to hear what Yucca and other people are
9 bringing into the news, and I'm glad to see that we
10 have people from the news here. Because we want to
11 understand it a little bit more.

12 When things are not done, train wrecks
13 happen. I think we are seeing something very slow
14 happening here. Or it seems slow to me. So I am
15 really hoping that something very different can happen
16 in relation to, instead of just fixing little problems
17 that come up with small penalties -- relatively small;
18 it would be a lot of money for me, but I'm not digging
19 a well -- they're fairly small punishments, and I
20 think they are, if not dismissed rudely, they're
21 dismissed crudely.

22 They don't know why. It's too
23 confusing to me to see why there isn't more traction
24 about what's happening in our home state. And this is
25 one particular part of it. When a spill is happening,

1 and then it happens again, it's just as frustrating to
2 me to read about, to hear about, to know about; and
3 thank you to the groups who have been speaking up on
4 both sides of all of this issue.

5 Finding out about this is a little
6 similar to finding out that there's a repeat drunk
7 driver who's offended over and over again. And I
8 think we all want more accountability. I don't think
9 money's doing it. I think publicity will do it. And
10 -- I like traveling by train. Let's not have New
11 Mexico be a train wreck. Thank you.

12 CHAIRMAN FUGE: And looking online,
13 Joni Arends, your hand's up. Please go ahead.

14 MS. ARENDS: Thank you very much for
15 this opportunity to speak. I also want to acknowledge
16 all the work of Yucca on this issue. I also have
17 never presented to this commission, and I -- my name
18 is Joni Arends. I am a cofounder and executive
19 director of Concerned Citizens for Nuclear Safety. We
20 work -- we're watchdogs of the DOE complex, Department
21 of Energy complex here in New Mexico.

22 I wanted to find out about the number
23 of staff that are available in OCD in the enforcement
24 department.

25 CHAIRMAN FUGE: Can you repeat that,

1 please?

2 MS. ARENDS: Yes. I was interested in
3 understanding the number of enforcement staffers in
4 OCD.

5 CHAIRMAN FUGE: We have a head count of
6 roughly 78 FTEs. 16 of them are field inspectors
7 deployed around the state. The majority of the field
8 inspectors are in the Permian Basin, another
9 significant chunk are in the San Juan Basin. Roughly
10 nine, five, and I'm including some compliance officer
11 supervisors. We are making some additional ads with
12 FTEs coming in later this year, so those are our
13 boots-on-the-ground folks.

14 And then essentially all of our
15 environment -- all of our engineering and
16 environmental teams are responsible for different
17 aspects of compliance and, sort of, rule enforcement.

18 And that goes from front-end well
19 development and design and other things on the front
20 end, how have you build your well, to end-of-life
21 questions of have you plugged it properly, other
22 things like that. Everything in between. Including
23 when a well has, you know, stopped producing for a
24 period. So that's roughly those OCD head counts.

25 MS. ARENDS: Thank you very much for

1 that information. And my final comment is about when
2 the follow-up meeting will happen to answer Yucca's
3 questions. Will it be a similar format to this
4 meeting?

5 CHAIRMAN FUGE: There is not another
6 informational presentation for the OCD currently set
7 on the docket. But that does not mean that one
8 couldn't occur in the future.

9 MS. ARENDS: Okay. Is it possible to
10 make a request for a timely response or a timely
11 second informational presentation to answer the Yucca
12 questions?

13 CHAIRMAN FUGE: You can submit a
14 request to the OCC clerk, Florene Davidson. Her
15 information is on the OCC website. And it'll be given
16 due consideration.

17 MS. ARENDS: Thank you very much. I,
18 again, appreciate all of the diligent and persistent
19 work of Yucca to protect New Mexico. Thank you.

20 CHAIRMAN FUGE: There's time for one
21 more comment, and then we need to move on to the other
22 items on the agenda. Anyone else in the room or
23 online?

24 Scrolling through the participants.
25 Seeing none, thank you for everyone who participated.

1 I'm going to give everyone a five-minute break to just
2 get some water, maybe use the restroom. Five or ten.
3 Let's resume at 10:40, and we will begin with our
4 first adjudication on the docket. That will give
5 folks an opportunity to -- parties in that case to set
6 up. Thank you.

7 (Off the record.)

8 CHAIRMAN FUGE: All right. We are
9 moving on to pending adjudication. First up is case
10 number 14720, Targa Northern Delaware, LLC, operator
11 of Red Hill AGI number one, and this concerns your
12 submission of injection data for the first four years
13 for Red Hill number one, your updated model of the
14 injection plume after 30, and, I believe, though not
15 covered in the agenda, a request to change some
16 submissions in your permit for the facility. Are all
17 the parties who entered an appearance in the matter
18 present?

19 Mr. Tremaine, are you representing OCD?

20 MR. TREMAINE: Yes, for the Division.

21 CHAIRMAN FUGE: Thank you. Do you have
22 any witnesses, either in the room or online?

23 MR. TREMAINE: We have Mr. Million
24 Gebremichael, who's OCD's sole witness, and he's
25 attending by Webex.

1 CHAIRMAN FUGE: I see him. Before we
2 get started, and I'm just going back over my notes
3 from the last meeting, Mr. Ampomah, was this the
4 matter you were excused from?

5 COMMISSIONER AMPOMAH: Yes.

6 CHAIRMAN FUGE: Thank you. Let's get
7 started. Ms. Hardy, please begin.

8 MS. HARDY: Thank you. Good morning,
9 Chair and commissioners. Dana Hardy with the Santa Fe
10 Office of Hinkle Shanor, on behalf of Targa Northern
11 Delaware. And I just wanted to give a very brief
12 introduction to explain why we're here.

13 Targa is the operator of the Red Hills
14 AGI number one well, under order number 13507.
15 Ordering paragraph 2c of that order, which was issued
16 on December 6th of 2012, required the operator to
17 present injection data covering the first four years
18 of injection, and also to provide an updated model of
19 the injection plume.

20 With respect to timing, the order
21 required this information to be submitted six months
22 to the end of the first five years of injection. And
23 as recognized in the order, this data is relevant to
24 the status of the government L-com number one well,
25 and specifically, whether that well should be plugged.

1 Injection commenced into the well in
2 2018, and we timely filed the information required by
3 the order with the Commission on November 30th of
4 2022. We also submitted updated information on March
5 31st of 2023.

6 The data was prepared by New Mexico
7 Tech, and Dr. Jiawei Tu is here to present it to the
8 Commission. And with that, I would call Dr. Tu as our
9 witness.

10 CHAIRMAN FUGE: Can I get the court
11 reporter to administer an oath for Dr. Tu, please?

12 THE REPORTER: Yes.

13 Dr. Tu, please raise your right hand.

14 WHEREUPON,

15 DR. JIAWEI TU,
16 called as a witness, and having been first duly sworn
17 to tell the truth, the whole truth, and nothing but
18 the truth, was examined and testified as follows:

19 THE REPORTER: Thank you. You may
20 proceed.

21 CHAIRMAN FUGE: Dr. Tu, please proceed,
22 and you should have authorization to share your screen
23 if you have slides to present.

24 THE WITNESS: Okay.

25 //

1 EXAMINATION

2 BY MS. HARDY:

3 Q Dr. Tu, I had a couple preliminary questions
4 for you. Can you please state your full name for the
5 record?

6 A My name is Jiawei, J-I-A-W-E-I, last name is
7 Tu, T-U.

8 Q And by whom are you employed, and in what
9 capacity?

10 A I'm currently employed by the New Mexico
11 Institute of Mining and Technology, under the
12 Department of Petroleum Recovery Research Center.

13 Q Have you previously testified before the
14 Commission?

15 A No. This will be my first time.

16 Q Can you, very briefly, summarize your
17 education and experience?

18 A I acquired my Masters and PhD from Texas
19 Tech in Petrol Engineering. I was conferred with the
20 degree in 2020.

21 MS. HARDY: I would request that the
22 Commission recognize Dr. Tu as an expert in petroleum
23 engineering.

24 CHAIRMAN FUGE: So recognized.

25 MS. HARDY: Thank you.

1 BY MS. HARDY:

2 Q Dr. Tu, did you prepare what's been marked
3 as Targa Exhibit 1?

4 (Targa Exhibit 1 was marked for
5 identification.)

6 A Yes, I prepared that.

7 Q And can you please present your evaluation
8 and the findings that are set forth in the exhibit?

9 A Yes. I'm going to.

10 THE WITNESS: Good morning,
11 Commissioners. So I will be presenting my finding
12 from the study for the Targa AGI number one injection
13 in the past four years.

14 So, first of all, I'd like to start it
15 with a little bit of background of the facility. So
16 the Targa Red Hill natural gas processing facility is
17 located at the Lea County, southeast of the New Mexico
18 state. So it was approved by the NMOCC on December
19 6th, 2012, the authority to inject treated acid gas.

20 And the ownership of that well was by
21 the Agave Energy back then, at that time, and later on
22 was acquired by Lucid Energy. But currently, the
23 Targa Northern Delaware, LLC, I'll refer to as the
24 Targa later in this presentation, currently holds the
25 ownership of this well.

1 The reason we're having this hearing
2 today is because by the time the NMOCC approved this
3 well, if you could see on this chart, that in the Red
4 Hill facility, there's -- in 3800 feet eastern of the
5 Red Hill number one, there's the well called
6 Government's L-com number one well. At that time,
7 there was technical difficulty of plugging that well.
8 Therefore, the NMOCC ordered that -- a conditionally
9 waived requirement to plug that well back then.

10 However, we were required to report the
11 first four years of injection data by the time that --
12 six months prior to that to report to NMOCC with the
13 updated model as well as the updated projection for
14 the 30 years' injection regarding the treated acid gas
15 plume movement/migration concerning the reservoir.

16 On this timeline, that is -- shows that
17 in 2012, the permit was approved. However, the AGI
18 number one never started injection until the year of
19 2018. So on 2022, May 1st, marking the fourth year of
20 the first year injection, that Targa retained New
21 Mexico Tech to initiate a study in compliance with the
22 NMOCC's order.

23 The New Mexico Tech performed the study
24 and reported to the NMOCC on November 30th, 2022. But
25 because of the hearing, as was scheduled on today,

1 that we actually updated with the data until -- that
2 data until March of 2023.

3 So now I'm going to present the study
4 for the five-year injection. On this slide, it shows
5 that -- the model that we -- the boundary of the model
6 that we constructed. So in this red contour, that
7 shows the size of the Red Hill facility, which is
8 about -- the size of our model is about 100 times of
9 the size of the Red Hill facility.

10 Now, you can see the Red Hill number
11 one and the government's L-com number one injectors
12 are located in these two locations.

13 MS. HARDY: Dr. Tu, can you identify
14 the slide number? Just for the record.

15 THE WITNESS: On slide number 6.

16 MS. HARDY: Thank you.

17 THE WITNESS: And in the model,
18 geologically, that we're simulating the formations
19 that -- from Lamar about to Bell Canyon to Cherry
20 Canyon and Brush Canyon, which will be our bedrock,
21 caprock, and storage reservoir, respectively.

22 The AGI number one well is perforated
23 and targeting injecting into the Cherry Canyon
24 formation. In the model, the Cherry Canyon formation
25 is subdivided into five layers, from layers number

1 three to layer number seven in the later presentation.

2 The dimension of our model covers --
3 has the grace number of 429 multiplied by 418
4 multiplied by eight layers. That brings it to almost
5 1.5 million grace in total. The average size of each
6 grace is about 100 square feet.

7 So the model initialization that we
8 have the initial conditions of the Cherry Canyon
9 reservoir set to be 3250 psi in pressure at the Red
10 Hill AGI number one location, and the temperature is
11 about 105.2 Fahrenheit degrees. The fluid saturation
12 that the initial saturation -- the reservoir is
13 saturated was 100 percent of water -- saline water,
14 with irreducible water saturation to be 20 percent.
15 The salinity of the reservoir saline -- brine is set
16 to be 20,000 ppm.

17 For the entire simulation, we operate
18 the well first from 2018, by the beginning of the AGI
19 number one injection, we used the historical injection
20 rate that -- pulled from the report by Targa as well
21 as on the website of the NMOCD. With roughly 13
22 percent of H2S and 87 percent of CO2. And the average
23 injection rate during these first four years are about
24 1.2 million standard cubic feet per day.

25 And beyond the year of 2023, that we

1 set the average injection rate to be 1.5 million
2 standard cubic feet per day. That will be the average
3 rate for the past three years -- past one year of
4 injection. And this simulation is stopped injected at
5 the year 2048, and simulation continues about 30 years
6 after the stop injection for post-injection site care
7 and monitoring.

8 Before we proceed, I have three points
9 that I would like the commissioners to consider and
10 put in mind, is that first, like, although that Targa
11 -- Red Hill AGI number one was permitted to inject
12 under the rate of 13 million standard cubic feet per
13 day, but during the injection test, that we weren't
14 able to inject excess of six million standard cubic
15 feet due to the surface pressure limitation --
16 injection pressure limitation.

17 Second of all, that even though it is
18 permit to inject under 13 million standard cubic feet,
19 the actual injection rate in the past five years, that
20 never exceeded two million standard cubic feet per
21 day.

22 Lastly, the Red Hill number one
23 expected to inject even lower than the rate that was
24 proposed by the time of the two adjacent wells, Red
25 Hill number two and three, are completely in a way

1 deeper reservoir, so -- information. This chart shows
2 the result of the historical injection --

3 COMMISSIONER BLOOM: I'm sorry. I'm
4 sorry, Dr. Tu, could you back up to that last slide
5 one moment? If you could just repeat the last third
6 point that you wanted us to take away, I'd appreciate
7 it.

8 THE WITNESS: Yes. The last point I'd
9 like to say is that the Targa is currently under
10 development plan of drilling two new AGI wells on the
11 path to -- into a deeper formation, so by the
12 completion of these two, that we expect injection
13 through AGI number one will be even further less than
14 the simulation as well as what's permitted.

15 COMMISSIONER BLOOM: Thank you. I
16 appreciate that.

17 THE WITNESS: Thank you. This chart,
18 slide number 10, it shows the historical injection of
19 the AGI number one in the past five years. In the
20 green circles that you're shown on this chart are the
21 historical data points that pulled from NMOCD website.
22 And the dashed green line is the simulator results.
23 That we can see that in the past four years, that we
24 have perfectly matched the exact injection rate from
25 the AGI number one.

1 And this green line -- excuse me, the
2 blue line that shows the cumulative gas injection. So
3 in the past five years, by the time of 2023, that the
4 AGI number one injected 2,000 million standard cubic
5 feet of acid gas into Cherry Canyon formation.

6 If we convert it to the mass quantity,
7 those injected by the end of the fourth year, that is
8 the CO2 equivalent to about 33,000 tons, and eight and
9 a half thousand pounds of H2S.

10 On this chart, it shows the aerial view
11 of the plume results at the end of the fourth year.
12 So we can see that, on the chart, that at end of the
13 fourth year, we see the color represents the
14 saturation of acid gas plume in Cherry Canyon
15 formation. So what we're seeing is the diameter of
16 this plume is expected to be around 400 feet, and the
17 front of the plume, the closest point of the plume to
18 the government L-com number one well is about 3600
19 feet, which is about .68 mile.

20 Next, we did the prediction phase of
21 the simulation. So we can see that starting from
22 here, before that was the historical injection. And
23 the prediction phase is to complete the 30-year
24 injection that we use the average injection rate in
25 the past one year, which is about one and a half

1 million standard cubic feet. So we used a similar
2 rate to continue with the injection until the year of
3 2048. That marking the end of 30 years injection.

4 And on this -- similarly, on the blue
5 curve, it shows the cumulative injection from the Red
6 Hill number one well will be about 16,000 million
7 standard cubic feet. And also, as I said, that upon
8 the completion of AGI number two and three, --
9 information that we expect the rates to be even lower
10 than what we simulated. So we are simulating a very
11 conservative -- most extreme scenarios for what could
12 happen.

13 So here's the plume and the area view
14 of showing at the end of the 30 years injection of
15 2048. That we're seeing that at the end of the 30
16 year injection, the diameter of the plume is about
17 1000 feet. And the closest point of the front of the
18 plume to the government L-com number one is about 3300
19 feet. Which is about .625 mile.

20 Therefore, based on the study that New
21 Mexico Tech conducted, that engineers and geologists
22 from the New Mexico Tech Petroleum Recovery Research
23 Center performed first, we developed a new geologic
24 model to delineate from the updated well tops and the
25 structural features.

1 And second of all, we used these high-
2 fidelity reservoir numeric model, conducted numerical
3 simulation of the first four years of the historical
4 injection, besides that and also the updated
5 prediction for the 30 years total injection to comply
6 with the NMOCC's order.

7 So, to conclude, it is found that the
8 -- first of all, the treated acid gas injections
9 through Red Hill number one in the past four years,
10 the average rate is about 1.2 million standard cubic
11 feet per day, which is less than ten percent of what
12 it was permitted, 13 million standard cubic feet per
13 day.

14 And second of all, the distance between
15 the Red Hill number one well -- from the Red Hill
16 number one well to the government L-com number one
17 well is about 38,000 feet, and by the time of January
18 2023, the front of the plume is estimated to be 3600
19 feet away from the government L-com number one well,
20 which is 95 percent of the distance between two wells.

21 And by the end of the 30-year
22 injection, the plume's front is predicted to be 3300
23 feet away from it, which is about 85 percent of the
24 distance between two wells.

25 So therefore, it is concluded that the

1 historical -- injection rate has been drastically
2 under the permitted rate, 13 million standard cubic
3 feet, and the -- plume resultant by the AGI number one
4 well puts a diminutive impact on the government L-com
5 number one well, even at the end of a 30-year
6 permitted injection period.

7 Therefore, we recommend that the Targa
8 to file a motion to either amend the order R-13507 to
9 the NMOCC to either eliminate or extend the waiver
10 plugging the government L-com number one well. That's
11 the end of my presentation.

12 MS. HARDY: I have no further
13 questions. I would move the admission of Targa
14 Exhibit 1.

15 CHAIRMAN FUGE: Into the record?
16 (Targa Exhibit 1 was received into
17 evidence.)
18 Mr. Tremaine, do you have any cross for
19 this witness?

20 MR. TREMAINE: No cross, Mr. Chair.

21 CHAIRMAN FUGE: Do you have any
22 additional witnesses, Ms. Hardy?

23 MS. HARDY: No, Mr. Chair, I do not.

24 CHAIRMAN FUGE: Thank you. Mr.
25 Tremaine?

1 MR. TREMAINE: Good morning, Mr. Chair,
2 commissioners. This is Jesse Tremaine for the Oil
3 Conservation Division. Very briefly, I'd like to
4 address -- just summarize OCD's presentation today.

5 And as indicated in the pre-hearing
6 statement, the Division's focus has primarily been on
7 consideration of the content of the milestone reports,
8 and they have prepared, and Mr. Gebremichael will
9 testify as to the recommended content for an update to
10 this report as well as future milestone reports.

11 One -- I'll call it an oversight -- OCD
12 did not -- and in our filing, we did not respond
13 directly to the recommendation of Targa related to
14 removal of the requirement to plug the government
15 L-com. That was not addressed in the pre-hearing
16 statements. My apologies for that.

17 However, in summary of OCD's position,
18 I will say that I think the position is that an
19 extension of that waiver and some form of monitoring
20 of that well is appropriate. OCD does not take a
21 position that the well needs to be plugged at this
22 time. And so, with that, I would move on to call the
23 Division's sole witness, Mr. Million Gebremichael.

24 MR. FUGE: May I ask the court reporter
25 to administer the oath for Mr. Gebremichael, who is

1 also appearing online?

2 THE REPORTER: Yes.

3 Please raise your right hand.

4 WHEREUPON,

5 MILLION GEBREMICHAEL,

6 called as a witness, and having been first duly sworn
7 to tell the truth, the whole truth, and nothing but
8 the truth, was examined and testified as follows:

9 THE REPORTER: Thank you. You may
10 proceed.

11 MR. TREMAINE: Thank you. And just
12 procedurally, Mr. Chair and commissioners,
13 Mr. Gebremichael, if you wish to share exhibits as we
14 walk through, I'll have Mr. Gebremichael do that.

15 CHAIRMAN FUGE: Okay.

16 MR. TREMAINE: Okay.

17 EXAMINATION

18 BY MR. TREMAINE:

19 Q Good morning, Mr. Gebremichael. Could you
20 please state your name for the record?

21 A Good morning. My name is Million
22 Gebremichael.

23 Q And where do you work?

24 A I work for the Energy, Minerals, and Natural
25 Resource department as a part of the group responsible

1 for the oversight of the underground injection control
2 for the Oil Conservation Division.

3 Q And what is your position with the OCD?

4 A I work as a petroleum specialist advanced in
5 the underground injection control group.

6 Q And what are the job responsibilities of
7 your position?

8 A Well, I review technical aspects of UIC
9 permits, provide recommendations to the district
10 offices for UIC wells, and then I provide input for
11 process of design and rulemaking.

12 MR. TREMAINE: Can the Commission hear
13 Mr. Gebremichael?

14 CHAIRMAN FUGE: Sort of, but maybe if
15 he spoke a little bit closer to his mic, that would
16 help.

17 THE WITNESS: Can you hear me now?

18 MR. TREMAINE: Yeah. Better.

19 THE WITNESS: Okay. I can repeat what
20 I said in regard to my responsibilities.

21 I review technical aspects of UIC
22 permits, and then I provide recommendations to the
23 district offices regarding UIC wells. And also
24 provide inputs to processes of design and rulemaking.

25 //

1 BY MR. TREMAINE:

2 Q Thank you, Mr. Gebremichael. Have you ever
3 testified before the Oil Conservation Commission
4 previously?

5 A No, I haven't.

6 Q Have you prepared a curriculum vitae for
7 this hearing?

8 A Yes. It is the OCD Exhibit Number 3.

9 (OCD Exhibit 3 was marked for
10 identification.)

11 Q And could I have you please summarize your
12 educational background, training, and experience for
13 the commissioners?

14 A Absolutely. I graduated from the Southern
15 Alberta Institute of Technology in 2012. Was a
16 Bachelor of Petroleum Engineering. Also, I have
17 successfully completed various specialized training in
18 exploration and production in the oil and gas field,
19 provided by Shell International, in places the US,
20 Canada, and then the Netherlands.

21 I have more than ten years' professional
22 experience working both in the oil and gas companies
23 and the provincial government of Alberta Oil and Gas
24 Regulator Department, which is an equivalent
25 organization with the OCD. And then currently, I'm

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1 working for the Energy, Minerals, and Natural Resource
2 Department as a part responsible for the oversight of
3 the underground injection control program for the OCD.

4 And then I have seven years' experience with
5 Shell International in dealing with production
6 optimization for more than 500 wells. Utilizing
7 artificial lift methods and secondary and tertiary
8 recovery methods, like water flooding and gas
9 injection.

10 I'm also experienced in the well reservoir
11 facilities and management surveillance work. I have
12 also monitored and mitigated acid gas injection wells
13 and sour-gas-producing wells. And I've made sure that
14 regulatory requirements of mechanical integrity tests
15 of injection wells are adequately met by analyzing
16 subsurface mechanical integrity tests, like sonic,
17 temperature, caliber, magnetic flux, and cement bond
18 lock.

19 I have also determined the pressure envelope for
20 well by calculating the maximum annual surface
21 pressure, utilizing, like, well testers, like the step
22 rate test and then follow-up testers.

23 I have also worked for three years with the
24 Alberta Energy Regulator for reserves, and then --
25 group, dealing with reserve determination, --

1 delineation, pressure studies. Also determining
2 whether an operator is practicing a good production
3 practice.

4 Also I was imposing maximum rate limitation
5 orders for violations for instances regarding the
6 producing high GOR wells.

7 Currently, for the last eight months, I am
8 working for MNRV with the UIC group for the OCD
9 division, reviewing technical aspects of UIC permits,
10 providing recommendations to district offices
11 regarding UIC wells; also providing input for process
12 design and rulemaking.

13 MR. TREMAINE: Mr. Chair, at this time,
14 I would move admission of Exhibit Number 3, and
15 subsequently ask that Mr. Gebremichael be recognized
16 as an expert in the field of petroleum engineering and
17 underground injection.

18 CHAIRMAN FUGE: Are there any
19 objections to Mr. Tremaine's motion?

20 MS. HARDY: No objections.

21 (OCD Exhibit 3 was received into
22 evidence.)

23 MR. TREMAINE: Thank you.

24 BY MR. TREMAINE:

25 Q Mr. Gebremichael, have you reviewed Targa

1 Red Hill number one milestone report?

2 A Yes.

3 Q And could you please summarize your opinion
4 of that milestone report?

5 A Well, Targa has furnished OCD with a very
6 elaborate model update and summary of the injection
7 rates over the last four years.

8 Q And did you hold any concerns with the
9 milestone report?

10 A Yes. OCD's in the process of implementing
11 new templates of recommended milestone report contents
12 and format. And OCD would like to recommend that
13 Targa provide OCD with comprehensive milestone report
14 updates, as depicted in OCD Exhibit Number 1.

15 (OCD Exhibit 1 was marked for
16 identification.)

17 Q And can you please summarize for the
18 Commission the recommendations that you've included in
19 Exhibit 1 for the Commission?

20 A Yes. OCD prepared this comprehensive
21 content package for milestone for all AGI wells to
22 ensure that well interventions and work order reports
23 conducted to maintain well mechanical integrity and
24 also the impact of AGI wells on offsetting wells that
25 are used to be provided to OCD in a scattered manner,

1 we would like to be presented in a single and then a
2 comprehensive report.

3 MR. TREMAINE: At this time, Mr. Chair,
4 I would move admission of Exhibit 1 and, if so
5 admitted, I would ask Mr. Gebremichael to share
6 Exhibit 1 on the screen.

7 CHAIRMAN FUGE: Any objections,
8 Ms. Hardy?

9 MS. HARDY: No objections.

10 CHAIRMAN FUGE: It's admitted.

11 (OCD Exhibit 1 was received into
12 evidence.)

13 MR. TREMAINE: Mr. Gebremichael, can
14 you please share Exhibit 1 to the
15 screen for the Commission's review?

16 THE WITNESS: Absolutely. All right.
17 Can you see it?

18 MR. TREMAINE: Yes, we can. Thank you.

19 THE WITNESS: You're welcome.

20 BY MR. TREMAINE:

21 Q Can you identify for the Commission the
22 specific information that's contained in Exhibit 1,
23 which OCD recommends be added to Targa's milestone
24 report?

25 A Absolutely. OCD would like Targa to add

1 items of Exhibit 1. These items are item number one,
2 item number two, item number three, item number four,
3 item number six, item number seven, item number eight,
4 and item number ten, and also the summary table
5 depicted in page 2 in Exhibit 1.

6 OCD would like also to recommend that Targa
7 monitor and inspect the government L number one well,
8 which is used as a control well in the plume model, to
9 monitor the extent of the treated acid gas plume from
10 Red Hill number one.

11 Also, monitoring and inspection would help OCD to
12 validate the accuracy of the plume model. So we would
13 expect them to do that inspection on an annual basis.

14 Q Thank you. If I could back up to the
15 contents of Exhibit 1, could you please clarify for
16 the Commission, the numbers that you've listed; one,
17 two, three, four, six, seven, eight, and ten; the
18 contents of those items. Are those -- could you
19 characterize for the Commission, please, whether those
20 contain information or reports that, according to your
21 understanding, Targa currently has available, or are
22 those things that Targa would have to create in
23 response to this request?

24 A Well, we're not reinventing any well here.
25 This information's available and that they used to be

1 provided to OCD through various portal or outlets. So
2 the intent of our template is to be presented in one
3 comprehensive package. So those reports are readily
4 available.

5 Q Thank you, Mr. Gebremichael. Could you
6 please move the slide to page 2 of Exhibit 1 for the
7 Commission's review?

8 A Absolutely. All right. Can you see Exhibit
9 2?

10 Q Back up one, please. That's Exhibit 2. I'm
11 looking for page 2 of Exhibit 1.

12 A There.

13 Q Thank you. So in the second part of your
14 response to my question, you identified that OCD was
15 requesting a summary table depicted here. I just
16 wanted to clarify that this is the recommended summary
17 table that OCD is requesting from Targa. Is that
18 correct?

19 A That's correct.

20 Q All right. Thank you. Moving on,
21 Mr. Gebremichael, does the Division have an exhibit
22 depicting AGI well activities within the state of New
23 Mexico?

24 A Yes. And it's in OCD Exhibit Number 2.

25 //

1 (OCD Exhibit 2 was marked for
2 identification.)

3 Q Okay. And could you please describe for the
4 Commission the purpose of Exhibit 2?

5 A Let me share it with you first. Yeah. The
6 purpose of this exhibit is to show the Commission the
7 number of active AGI wells in the state of New Mexico
8 that are enabling an economic production of sour gas
9 without flaring H2S and venting CO2 in the atmosphere.

10 It's kind of designed to give them a bird-eye
11 view of the AGI wells in the state.

12 MR. TREMAINE: Thank you,
13 Mr. Gebremichael.

14 At this time, Mr. Chair, I would move
15 admission of OCD Exhibit Number 2.

16 CHAIRMAN FUGE: Ms. Hardy, any
17 objections?

18 MS. HARDY: No objections.

19 CHAIRMAN FUGE: Motion granted.

20 (OCD Exhibit 2 was received into
21 evidence.)

22 BY MR. TREMAINE:

23 Q And my last question, Mr. Gebremichael: In
24 your opinion, will inclusion of the items that you
25 referenced in OCD Exhibit 1 into a single

1 comprehensive milestone report and the ongoing
2 monitoring of the government L well for the next
3 reporting period assist in the prevention of any waste
4 or harm to correlative rights?

5 A Yes.

6 MR. TREMAINE: Thank you. No further
7 questions.

8 CHAIRMAN FUGE: Any cross, Ms. Hardy?

9 MS. HARDY: I just have a couple of
10 clarification questions. I might not have heard all
11 of the testimony.

12 CROSS-EXAMINATION

13 BY MS. HARDY:

14 Q I just wanted to clarify OCD's
15 recommendation regarding the government L well. Is it
16 that it continue to be monitored for another five
17 years? I just wasn't clear on the recommendation.

18 A Well --

19 THE WITNESS: May I respond to the
20 question?

21 CHAIRMAN FUGE: Yes.

22 A So in absence of not re-entry to the well,
23 OCD would like Targa to visit this well on an annual
24 basis to inspect and monitor the impact of the treated
25 acid gas plume in the well. See, the only way you

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1 could validate the accuracy of the model is basically
2 by inspecting an offsetting well; in this case, the
3 government L well is our control well.

4 And then we would like you to, you know, report
5 to OCD if there is no impact or if there is an impact.

6 Q Thank you. And then, with respect to the
7 reporting recommendation on Exhibit 1, are those items
8 requested by OCD to be included along with the
9 information Targa's provided here, or would that be
10 for future reports?

11 A That's a very good question. We're in the
12 process of implementing this new template, and then
13 we're aware of that you're not aware of it as well.
14 OCD would appreciate that if you could resubmit this
15 report by including the items recommended.

16 MS. HARDY: Thank you. Those were all
17 my questions. Thank you.

18 CHAIRMAN FUGE: Any other witnesses or
19 testimony?

20 MR. TREMAINE: No, Mr. Chair.

21 CHAIRMAN FUGE: Commissioner Bloom, any
22 questions for you with respect to Mr. Gebremichael's
23 testimony?

24 COMMISSIONER BLOOM: Let me think one
25 second here, Mr. Chair. Thank you. Let me look at my

1 list of questions.

2 Backing up a bit, Mr. Gebremichael, and
3 I don't know if you're prepared to answer this today
4 given the lengthy history of these wells, but
5 ultimately, what becomes of the government number one
6 well? It appears that Targa or past operators were
7 not able to re-enter and plug. What's the long-term
8 outlook here?

9 THE WITNESS: That will depend on the
10 result of our inspection and monitoring. You know,
11 depending on those results, if there is any severe
12 impact, then probably we might start weighing the
13 risk, and we might decide then.

14 COMMISSIONER BLOOM: Okay. No further
15 questions at this time, Mr. Chair. Thank you.

16 MR. FUGE: I just had one clarification
17 because I probably wasn't writing it down quickly
18 enough. Mr. Gebremichael, can you please -- and I
19 think if I understood your responses, Ms. Hardy -- can
20 you please repeat the items that you would like
21 included from the list on Exhibit 1 with the
22 resubmission of the report they made initially in
23 November and then updated in March? Just by number?

24 THE WITNESS: Yes. Absolutely. So
25 those are items number one, item number two, item

1 number three, item number four, item number six, item
2 number seven, item number eight, and item number ten,
3 and also the summary table depicted in page 2 in
4 Exhibit 1.

5 The summary table is basically -- they
6 did present the information in the form of a graph,
7 but we would also like it in the, you know, in a table
8 format. So the whole intention for OCD is to have a
9 one-stop-shop for the well, so we can analyze the
10 well's history as a milestone report. So that's the
11 intent from OCD perspective.

12 CHAIRMAN FUGE: To Mr. Tremaine, to
13 clarify OCD's position on Targa's request, you do not
14 oppose -- just restated about -- that COM-1?

15 MR. TREMAINE: The government L --

16 CHAIRMAN FUGE: I'm sorry. Government
17 L.

18 MR. TREMAINE. Yes. Thank you,
19 Mr. Chair. To summarize OCD's position, it is not
20 necessary or, in fact, prudent for Targa to plug the
21 government L-1 well at this time. It should remain in
22 its current status and, according -- along with
23 Mr. Gebremichael's testimony, OCD's request is that
24 Targa monitor and inspect that well on an annual basis
25 to verify the findings consistent with the plume

1 modeling.

2 And ultimately, the decision as to
3 whether the eventual requirement to plug that well or
4 another extension would be determined at the time of
5 the next milestone report.

6 CHAIRMAN FUGE: Okay. And would both
7 of those requests require amendments to the actual OCC
8 order? Additional conditions?

9 MR. TREMAINE: I believe that would be
10 appropriate. The -- from memory, from the order, I
11 believe that it indicates that the -- that the
12 existing order indicates that that requirement to plug
13 the well could be removed or extended upon the showing
14 by Targa here today. So I think that, either in the
15 form of an amendment or by adding conditions, would be
16 appropriate mechanisms for that.

17 CHAIRMAN FUGE: Are they currently
18 required by the order to annual monitoring?

19 MR. TREMAINE: I would have to review
20 the order, Mr. Chair. Mr. Gebremichael may be able to
21 answer that question.

22 THE WITNESS: Sorry, I didn't hear the
23 question.

24 MR. TREMAINE: Is Targa currently
25 required by the existing order to conduct annual

1 monitoring? I believe that is a new request made by
2 the Division.

3 THE WITNESS: No, but that's a new
4 request made by the Division.

5 MR. TREMAINE: Thank you for that
6 clarification.

7 That is my understanding, Mr. Chair, is
8 that the options in the existing order were that Targa
9 were to plug the well or that the requirement to plug
10 the well could be extended or removed at this meeting.
11 And so OCD is requesting that that requirement to plug
12 the well be extended to the next reporting period, but
13 it is asking for an additional condition, to conduct
14 that monitoring on an annual basis, because the
15 existing order does not contain that mechanism to
16 essentially verify the plume modeling.

17 CHAIRMAN FUGE: And for the items
18 listed on the OCD Exhibit 1, one, two, three, four,
19 six, seven, eight, and ten; that OCD is requesting
20 Targa report on and utilizing the summary table, which
21 I believe is on the second page of Exhibit 1; is that
22 a one-time request or is that a recurring request for
23 subsequent reporting?

24 MR. TREMAINE: That is a one-time
25 request in terms of updating the existing report, but

1 it is an ongoing request for future milestone reports.
2 And OCD expects this to be a standardized template and
3 request for milestone reports for other AGI wells.

4 CHAIRMAN FUGE: Okay. I have no
5 further questions. Since Commissioner Ampomah is
6 refused, Commissioner Bloom, would you like to go into
7 closed session for deliberation and discuss, or do you
8 think we can make a decision here?

9 COMMISSIONER BLOOM: Yeah.
10 Mr. Chairman, I guess my still-unanswered question --
11 it's something I was struggling with here -- is
12 ultimately, will the government 1 well be P&A-ed,
13 plugged and abandoned, at some future point? I guess
14 that's my question, is ultimately, is this plugged?
15 And I don't know if that's something that
16 Mr. Gebremichael can address at this time, or
17 Mr. Tremaine.

18 CHAIRMAN FUGE: Yeah.

19 MR. TREMAINE: Commissioner Bloom,
20 regretfully, I am not prepared to speak to whether or
21 not Targa actually did re-enter the well at any point.
22 I know that there were concerns in the -- as you know,
23 in a quite substantial record about the process of re-
24 entering that well.

25 So at this time, I would say that if

1 Ms. Hardy's able to answer the question, that's fine.
2 If not, I would suggest that OCD can submit some form
3 of supplemental report detailing or explaining what
4 happened with that well at the time of the last order.

5 MS. HARDY: And -- may I?

6 CHAIRMAN FUGE: Yes, Ms. Hardy, please.

7 MS. HARDY: Thank you.

8 I can provide some additional
9 information. The government L well -- it's my
10 understanding that it is partially plugged, but it was
11 not able to be completely plugged. And it is operated
12 by another company, it's operated by EOG. So it's not
13 operated by Targa. That's the status of the well
14 right now.

15 CHAIRMAN FUGE: Okay. And it sounds
16 like we had respect to that, just for my own
17 clarification, that Mr. Tremaine, if I understood your
18 representation, at least with respect to the well, we
19 would be -- at least, from the OCD's perspective, we
20 would be pushing out the obligation to plug it an
21 additional five years, as that -- that's the reporting
22 interval. And then we would revisit it at the time of
23 a subsequent report.

24 MR. TREMAINE: That is correct,
25 Mr. Chair.

1 CHAIRMAN FUGE: And in the intervening
2 time, it would be used for monitoring and other things
3 like that? So just -- if I'm understanding it, as --
4 confirms, we're not modeling this occurring?

5 MR. TREMAINE: That's correct. On an
6 annual basis, Mr. Chair.

7 COMMISSIONER BLOOM: A follow-up
8 question then, if you'll permit me, Mr. Chair.

9 CHAIRMAN FUGE: Yes, please.

10 COMMISSIONER BLOOM: So does the --
11 would the plugging of the government number one well
12 endanger somehow operations of the Red Hills AGI
13 number one, Targa's well? I don't understand why that
14 is dependent -- why the status of the government
15 number one well would be dependent on -- or I guess I
16 don't understand why the status of the Red Hills AGI
17 number one well would be dependent on whether
18 government number one well is dealt with.

19 MR. TREMAINE: I can try to explain,
20 Commissioner Bloom, or if you prefer, the question can
21 be directed to Mr. Gebremichael. But my understanding
22 is at the time of the initial and the amended orders,
23 there were a number of wells that existed in a
24 previously plugged status in proximity to the Red
25 Hills AGIs.

1 And a concern there, at a very general
2 level, is that those were not plugged with an acid gas
3 plume in mind, and so there was an initial requirement
4 in the orders to re-plug those wells. That did not
5 happen to completion to plug the government L well,
6 and so as Mr. Gebremichael indicated in his direct
7 testimony, OCD feels it's prudent to continue using
8 that government L number one well as a test well.

9 So the link between the two is that,
10 again, at a very, very high level, if the inspections
11 reveal some indication that the plume has moved that
12 far out to the test well, then that would indicate
13 that there was some issue with the modeling and that
14 some considerations with the operation of the Red
15 Hills AGI would need to be reconsidered.

16 Did that answer your question?

17 COMMISSIONER BLOOM: Mr. Tremaine, yes.
18 Thank you. That's helpful. You've painted a better
19 picture for me of the interrelationship between the
20 wells and what we're trying to manage and why we'd be
21 concerned about the plume reaching the government L
22 number one well. No further questions.

23 CHAIRMAN FUGE: Commissioner Bloom,
24 would you like to go into closed session to deliberate
25 on this, or do you think we can be prepared to kind of

1 make a decision on the request?

2 COMMISSIONER BLOOM: Mr. Chair, I think
3 we're probably ready to consider motions. I do not
4 believe that we need to go into closed deliberations
5 here. One other -- with the expectation that I think
6 the recommendations I'm hearing from the OCD are that
7 the five years -- more monitoring take place with
8 annual reports, that Targa should resubmit its report
9 along the lines of the new template that OCD has
10 developed for AGI wells.

11 That would all seem to make sense to
12 me. And using the new table that was developed as
13 well. If that's what we're looking at, I don't think
14 we need to deliberate in private.

15 CHAIRMAN FUGE: I think that's what
16 we're looking at. Can someone just -- hazard of not
17 having the right focus on the screen -- give me the
18 order number that we would be amending?

19 MS. HARDY: Yes. It would be order
20 R-13507.

21 CHAIRMAN FUGE: 13507.

22 MS. HARDY: And I believe that it is --
23 there are several orders, so there are orders after
24 this one that contained the plugging requirements.

25 CHAIRMAN FUGE: Do you know --

1 MS. HARDY: It's D. It's 13507-D.

2 CHAIRMAN FUGE: 13507-D.

3 MS. HARDY: Yes. That would be
4 amended.

5 CHAIRMAN FUGE: Okay. All right. I
6 think I'll put it together. Commissioner Bloom, I
7 believe you and I are in alignment, but I think the
8 motion is to amend Commission order number R-13507-D.
9 To extend the plugging obligation on Government L --

10 MS. HARDY: One. Com.

11 CHAIRMAN FUGE: -- Government L 001 Com
12 for another reporting period, to require annual
13 monitoring of that well, and to require subsequent
14 report submissions to include the information
15 contributed OCD Exhibit 1, page 1, one, two, three,
16 four, six, seven, eight, and ten, and to be reported
17 in the manner on the template provided in OCD Exhibit
18 1, page 2. And that that should be for all previously
19 submitted reports and any future reports.

20 COMMISSIONER BLOOM: If that's our
21 motion, I would so move, Mr. Chair.

22 CHAIRMAN FUGE: Okay. I second. Since
23 it's just the two of us who are voting, let the record
24 reflect that the motion is approved, and the order
25 will be so amended.

1 MS. HARDY: Thank you.

2 CHAIRMAN FUGE: Thank you, everyone.
3 We have one more -- well, we actually have two more
4 matters on the docket, but they concern the same
5 thing. I'm going to -- unless parties would like
6 something different, I appreciate we've been here for
7 a while, but we're going to give another fifteen-
8 minute break for folks to stretch out and go again.

9 I am also happy to provide a lunch
10 break, but I think we can wrap things up today. I'm
11 just looking out at the crowd and my fellow
12 commissioners. We good to keep moving through?

13 MS. HARDY: Let me check with my
14 witnesses.

15 COMMISSIONER BLOOM: Mr. Chair, I would
16 need a lunch break today. Either now, at 11:30, or at
17 noon.

18 CHAIRMAN FUGE: Why don't we, since
19 we've concluded the case and wrapped this up, why
20 don't we take a lunch break now. And can we resume at
21 12:30? Does that work for you, Commissioner Bloom?
22 Or thereabouts?

23 COMMISSIONER BLOOM: Absolutely. I
24 appreciate that. Thank you, Mr. Chair.

25 CHAIRMAN FUGE: Okay. We'll be back.

1 Thank you.

2 MS. HARDY: Thank you.

3 (Off the record.)

4 CHAIRMAN FUGE: All right, just a quick
5 check. We're going to resume here. We're going to
6 actually deal with cases 23294 and case 23464, which
7 are related. And actually, despite their placement on
8 the agenda, I think we should actually sort of just
9 hear them jointly, and 23464 first, and, you know,
10 23294 sort of second, because it's kind of a logical
11 conclusion depending on how we act on 23464.

12 Looking to counsel for Salt Creek,
13 counsel for OCD, and Ameredev, all -- appearances.
14 Are your witnesses present and available so we can
15 begin?

16 MS. HARDY: Yes, they are. Thank you.

17 MR. TREMAINE: Yes. For OCD,
18 Mr. Chair, Mr. Gebremichael is again attending by
19 Webex.

20 CHAIRMAN FUGE: And I understand
21 there's no witnesses for Ameredev?

22 MS. HARDY: That's correct. Although I
23 would like to make a brief statement on the record, if
24 possible. Thank you.

25 CHAIRMAN FUGE: So, given that we have

1 three parties entered and appearing here, I'm going to
2 go and let everyone do kind of a brief opening
3 statement synopsis, and then we'll let the petitioners
4 put on their witnesses for the matter. But we'll turn
5 it over to you, Ms. Hardy, for your opening.

6 MS. HARDY: Thank you very much. And I
7 will be --

8 COMMISSIONER BLOOM: Mr. Chair?

9 CHAIRMAN FUGE: Yeah?

10 COMMISSIONER BLOOM: Is Dr. Ampomah
11 joining us for this case, or is he recused again?

12 COMMISSIONER AMPOMAH: No, I'm here.

13 CHAIRMAN FUGE: My understanding is
14 Dr. Ampomah was only excused from 14720, so we have a
15 full commission to hear this case.

16 That's correct, Dr. Ampomah?

17 COMMISSIONER AMPOMAH: Yes. That is
18 correct.

19 COMMISSIONER BLOOM: Excellent. Thank
20 you. Just wanted to clarify. Appreciate it.

21 Sorry, Ms. Hardy. Go ahead.

22 MS. HARDY: Thank you. The Commission
23 issued order number R-20193C [sic] on January 16th of
24 2020, approving Salt Creek's application for
25 authorization to inject treated acid gas into the Salt

1 Creek AGI number one well, which is located in section
2 21, township 26 South, range 36 East in Lea County.

3 The order provided that the well be
4 completed in the Bell Canyon and Cherry Canyon
5 formations of the Delaware Mountain Group, with an
6 injection interval from approximately 5,410 feet to
7 7,000 feet.

8 The order incorporated permit
9 conditions that were agreed upon by Salt Creek, OCD,
10 and the state land office. On December 28th, 2020,
11 the Commission issued order number R-20913-D,
12 extending the deadline for Salt Creek to commence
13 injection until December 28th, 2022.

14 And I wanted to mention that that well
15 is on track to be a redundant well. There is a
16 requirement in the order that Salt Creek also drill
17 and complete a Devonian well subsequently to this
18 well. And so that C108 has been submitted for the
19 Devonian well; I just wanted to mention that so that's
20 clear.

21 Salt Creek did spud this well, the AGI
22 number one, on October 18th of 2022, and commenced
23 drilling, but encountered technical complications that
24 ultimately caused it to plug the well. As a result,
25 on December 6th of 2022, Salt Creek filed an

1 application seeking to amend the order numbered 20913-
2 D to extend the deadline to commence injection until
3 six months from the date of the amended order. And
4 that application has been assigned case number 23294.

5 And then on January 6th, 2023, the
6 Commission did issue an order stating that injection
7 deadline, pending a final decision. Subsequently,
8 Salt Creek determined that it needed to revise the
9 well design to add two additional casing strings and
10 move the location of the well approximately 120 feet
11 from its additional location.

12 As a result of the need for those
13 changes, Salt Creek submitted its application in case
14 number 23464, seeking approval of its amended C108 and
15 an extension of the deadline to commence injection
16 until 24 months from the date of the amended order.
17 The target injection zone for the well will remain in
18 the Bell Canyon and Cherry Canyon formations at depth
19 of approximately 5,580 to 7,040 feet.

20 The well, as proposed in the C108 --
21 the amended C108, rather -- will not cause waste,
22 impair correlative rights, or harm public health or
23 the environment. Also, as the Commission previously
24 recognized in its orders, including order R-20913-C,
25 the well will facilitate the sequestration of CO2 and

1 treated acid gas, which is in the public interest.

2 Accordingly, Salt Creek's request to
3 relocate and redesign the well is reasonable and
4 consistent with the order and requirements of the Oil
5 and Gas Act, and it will not cause waste, impair
6 correlative rights, or harm public health.

7 That is all I have for my opening.

8 Thank you.

9 CHAIRMAN FUGE: Mr. Tremaine?

10 MR. TREMAINE: Thank you.

11 Mr. Chair and commissioners, thank you.

12 The Oil Conservation Division has been in regular
13 contact with Salt Creek regarding this amended
14 proposal to update the casing and move the surface
15 location for this particular AGI well. I think that
16 that communication, as I said, has been ongoing, and
17 technically substantive, so partly at the request and
18 recommendation of the OCD, you know, Salt Creek
19 submitted the amended application as a new application
20 and that -- OCD wanted to see that happen in the
21 interest of keeping a really clear record of the cases
22 and orders. So it's -- the case files on the record
23 is clear as to what happened with this particular
24 well.

25 As part of that, despite the issues

1 that Salt Creek experienced with the previous drilling
2 activities, and because the OCD has been in regular
3 communication with them, ultimately, the OCD is
4 satisfied that even though there are still risks
5 associated with the drilling of this well and the
6 formations that they're dealing with, the revised plan
7 that's submitted by Salt Creek in conjunction with the
8 conditions recommended by the OCD, OCD believes that
9 this plan is sufficient for the Commission to approve
10 that well.

11 So today, the OCD and Mr. Gebremichael
12 will testify to the review that he and the rest of the
13 UIC group performed in assessing and reviewing the
14 amended application and give a brief overview of what
15 are now pretty standard conditions of approval that
16 OCD is proposing for this AGI well.

17 Ultimately, in 23464, OCD will support
18 approval of the well along the lines that will be
19 outlined by Mr. Gebremichael. And once we get to that
20 point in the following case, OCD will not take a
21 position or will not object to extension of that
22 injection authority and the other deadlines associated
23 with it. Thank you.

24 CHAIRMAN FUGE: Ms. Bennett for
25 Ameredev?

1 MS. BENNETT: Thank you very much.

2 Good morning, Chair and commissioners.
3 Deana Bennett from Modrall Sperlring on behalf of
4 Ameredev Operating, LLC. Ameredev, as I mentioned in
5 our pre-hearing statement, takes no position on Salt
6 Creek Midstream's applications. Ameredev does have
7 some general concerns, though, with the shallow
8 injection that's proposed for AGI -- excuse me, for
9 acid gas, which I outlined in our pre-hearing
10 statement as well, but which I will briefly summarize
11 for the commissioners.

12 So the first concern that Ameredev
13 outlined in the pre-hearing statements -- this is just
14 general concerns with shallow injection of acid gas --
15 that injection into the Delaware Mountain Group may
16 increase cost to operators because the operators will
17 need to implement additional wellbore design features.
18 And so that could lead to increased costs because they
19 will be drilling through an acid gas target zone, or
20 an acid gas injection zone.

21 Secondly, injection into the Delaware
22 Mountain Group could affect the pressure
23 characterization, which in turn could lead to
24 decreased production. And that would impact
25 correlative rights.

1 And finally, injection of acid gas into
2 the Delaware Mountain Group may impact the Capitan
3 Reef, if wellbores in the vicinity haven't been
4 properly plugged and abandoned.

5 Ameredev does support the drilling of
6 the deep -- the Devonian well that Salt Creek
7 Midstream is required to drill, under the conditions
8 of the approved order. And in our pre-hearing
9 statement, we noted that in fact, Ameredev would
10 appreciate or supports expediting the requirements in
11 that order to get the deeper well online and injection
12 started quicker.

13 And Ameredev also supports the
14 conditions that OCD imposed, or that OCC imposed, on
15 the original order. And it's my understanding, and it
16 seems like it's everyone's understanding today, that
17 those conditions will be part of -- if approved, those
18 conditions will remain in effect in terms of the
19 timing for drilling and injection into the Devonian
20 well and the concomitant requirement to cease
21 injections into the DMG well, leaving that well as a
22 redundant well.

23 Thank you again for the ability to be
24 here, and I appreciate your time.

25 CHAIRMAN FUGE: Ms. Hardy, if you'll

1 please call your first witness?

2 MS. HARDY: Thank you. Our first
3 witness is John Nicholson.

4 CHAIRMAN FUGE: And if I might ask the
5 court reporter to swear in the witness?

6 THE REPORTER: Please raise your right
7 hand.

8 WHEREUPON,

9 JOHN NICHOLSON,
10 called as a witness, and having been first duly sworn
11 to tell the truth, the whole truth, and nothing but
12 the truth, was examined and testified as follows:

13 THE REPORTER: Thank you.

14 You may proceed.

15 MS. HARDY: Thank you.

16 EXAMINATION

17 BY MS. HARDY:

18 Q Can you please state your full name for the
19 record?

20 A John Nicholson.

21 Q And, Mr. Nicholson, where do you reside?

22 A Houston, Texas.

23 Q By whom are you employed and in what
24 capacity?

25 A Salt Creek Midstream, and I'm the chief

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1 operating officer.

2 Q And what are your responsibilities as chief
3 operating officer?

4 A Responsible for all engineering, capital
5 projects, and operations for the company.

6 Q Have you previously testified before the
7 Commission?

8 A No.

9 Q Given that, would you briefly summarize your
10 educational background and professional experience?

11 A Sure. I have a bachelor's in petroleum
12 engineering and an MBA from the University of Texas at
13 Austin. And have about 16 years of experience,
14 primarily in operations of upstream and midstream oil
15 and gas assets.

16 MS. HARDY: Mr. Chair and
17 commissioners, I'd like to tender Mr. Nicholson as an
18 expert in petroleum engineering.

19 CHAIRMAN FUGE: Do I see any
20 objections?

21 UNIDENTIFIED SPEAKER: No objection.

22 CHAIRMAN FUGE: Recognized as an
23 expert.

24 MS. HARDY: Thank you.

25 //

1 BY MS. HARDY:

2 Q Mr. Nicholson, are you familiar with the
3 information contained in Salt Creek Midstream's
4 application for injection authority?

5 A Yes.

6 Q Can you please identify the document that
7 has been marked as Salt Creek Exhibit A?

8 (Salt Creek Exhibit A was marked for
9 identification.)

10 A It's an application for extension related to
11 case 23294.

12 Q And is Exhibit A a true and correct copy of
13 the application?

14 A Yes.

15 Q What does the application request?

16 A An extension for injection of six months
17 from the amended order.

18 Q Can you please identify the document that's
19 been marked as Salt Creek Exhibit B?

20 (Salt Creek Exhibit B was marked for
21 identification.)

22 A Another extension request related to case
23 23464.

24 Q And is Exhibit B a true and correct copy of
25 the application?

1 A Yes.

2 Q And what does that application request?

3 A An amended C108 as well as a 24-month
4 extension of the injection from the approval of the
5 order.

6 Q And is Salt Creek's amended C108 attached to
7 that hearing application?

8 A Yes.

9 Q Who prepared the amended C108?

10 A Geolex.

11 Q And was that David White?

12 A David White at Geolex. Yes.

13 Q Will Mr. White also testify?

14 A Yes.

15 Q And was the amended C108 prepared at Salt
16 Creek's direction?

17 A Yes.

18 Q Okay. Can you please briefly summarize the
19 changes in the amended C108 from a high level?

20 A Yes. So it's primarily a change in wellbore
21 design to kind of compensate for the issues that we
22 saw in the first well. So we're adding -- requesting
23 an additional two strings as well as a 120-foot
24 relocation of the wellbore.

25 Q And why is Salt Creek requesting a 24-month

1 extension of the injection deadline?

2 A We believe that 24 months is an adequate
3 time for us to prepare and drill the well
4 successfully, as well as stand up the facilities
5 necessary to inject the acid gas. And in addition to
6 that, allow our producing customers time to adjust
7 their drilling plans to drill sour gas wells, which is
8 required in order for us to meet the order.

9 Q And if the Commission approves Salt Creek's
10 request for a 24-month extension in case number 23464,
11 is it correct that Salt Creek would no longer need the
12 six-month extension requested in case 232294?

13 A Yes.

14 Q Mr. Nicholson, can you please identify the
15 documents that have been marked as Salt Creek Exhibit
16 C?

17 (Salt Creek Exhibit C was marked for
18 identification.)

19 A That's the presentation.

20 Q Okay. And I am trying to share this. But
21 I'm not sure if it's -- I don't see it on the screen,
22 so I don't --

23 CHAIRMAN FUGE: You are a presenter.

24 MS. HARDY: So if I hit "Share," it
25 should work.

1 CHAIRMAN FUGE: Just give it a second
2 -- it should work now. There we go.

3 MS. HARDY: Thank you. Okay. Now we
4 can see it. There's a little lag, I think, in what
5 I'm getting here.

6 CHAIRMAN FUGE: Yeah.

7 MS. HARDY: Okay. Okay.

8 CHAIRMAN FUGE: Give it a second.

9 MS. HARDY: Yeah.

10 BY MS. HARDY:

11 Q Well, can you tell me who prepared the
12 PowerPoint presentation?

13 A Geolex and Salt Creek.

14 Q Okay. And are you familiar with the content
15 of the presentation?

16 A Yes.

17 MS. HARDY: There's still a lag.

18 CHAIRMAN FUGE: See if you go down a
19 slide -- there we go.

20 THE WITNESS: There it is now.

21 MS. HARDY: There we go. Okay.

22 BY MS. HARDY:

23 Q Mr. Nicholson, can you please provide an
24 overview of Salt Creek Midstream's operations?

25 A Yes, sure. We're a private midstream

1 company in the Delaware Basin, which spans about eight
2 counties with 400 miles of pipe. We have two
3 cryogenic plants just outside of Pecos, Texas. And we
4 have substantial operations in Eddy and Lea County,
5 New Mexico.

6 Q And does the slide that's shown on the
7 screen provide an overview of Salt Creek's operations?

8 A Yes. It's an accurate representation of our
9 operations today.

10 Q And what is the role of this AGI project in
11 Salt Creek's operations?

12 A Today, Salt Creek is primarily a sweet gas
13 gathering and processing company, and we view the AGI
14 as a natural extension into Lea County of our assets
15 that will allow us to gather sour gas, treat that sour
16 gas, and then take the sweet gas from that facility
17 through our gathering and processing facility.

18 Q And can you provide a summary of the history
19 of this AGI well?

20 A Sure. So we spud AGI 1 in late October.
21 While drilling the production interval, we experienced
22 unstable hole just below the surface casing, as well
23 as significant losses in the Capitan Reef.

24 While we were trying to run production casing,
25 casing became stuck. After multiple attempts to

1 retrieve that casing, we ultimately decided with OCD's
2 support in mid-November to plug AGI 1 and sidetrack
3 the well.

4 We completed the plugging operation in early
5 December, and subsequently sidetracked the well.
6 During drilling operations of sidetrack 1, we
7 experienced the same unstable hole just below the
8 surface casing, as well as more losses in the Capitan
9 Reef.

10 This time, the drill string became stuck. And
11 again, with OCD's support, we agreed to plug the well.
12 Plugging operations were complete in late December.
13 And then throughout January, we consulted with the OCD
14 on a update to the well design that we thought would
15 put those two challenging areas behind pipe. And we
16 submitted that in February. Submitted the amended 108
17 in February -- C108 in February.

18 Q And has Salt Creek worked with OCD to
19 address these issues throughout the time period that
20 you were drilling this well?

21 A Yes.

22 Q Has Salt Creek submitted its C108 for the
23 Devonian well?

24 A Yes. We submitted it prior to spudding the
25 DMG well.

1 Q And is Salt Creek planning to proceed to
2 drill and complete that well?

3 A Yes.

4 Q Has Salt Creek remained in compliance with
5 the requirements of order 20913-D?

6 A Yes.

7 Q Have you reviewed the permit conditions that
8 OCD has submitted in this case?

9 A Yes, I have.

10 Q And does Salt Creek agree to those
11 conditions?

12 A Yes, we do.

13 Q In your opinion, will granting Salt Creek's
14 application prevent waste and protect correlative
15 rights?

16 A Yes.

17 Q And will it also protect human health and
18 the environment?

19 A Yes, it will.

20 MS. HARDY: I have no further questions
21 for Mr. Nicholson. I would request the admission of
22 Salt Creek Exhibits A, B, and C. And Exhibit B
23 includes the amended C108.

24 CHAIRMAN FUGE: Any objections?

25 MR. TREMAINE: No objections.

1 CHAIRMAN FUGE: Exhibits are admitted.
2 (Salt Creek Exhibit A, Salt Creek
3 Exhibit B, and Salt Creek Exhibit C
4 were received into evidence.)

5 MS. HARDY: Thank you.

6 CHAIRMAN FUGE: Mr. Tremaine, do you
7 have cross?

8 MR. TREMAINE: We do not have cross,
9 Mr. Chair.

10 CHAIRMAN FUGE: I just have one defined
11 question -- commissioners first. Commissioner Bloom
12 or Commissioner Ampomah, do you have any questions?

13 COMMISSIONER BLOOM: No, Mr. Chair.

14 CHAIRMAN FUGE: A quick one. When you
15 said -- the new -- is going to be --

16 THE WITNESS: Correct.

17 CHAIRMAN FUGE: [Unintelligible
18 response.]

19 UNIDENTIFIED SPEAKER: I'm sorry, we
20 can't hear.

21 CHAIRMAN FUGE: Can you hear me now?

22 UNIDENTIFIED SPEAKER: Yes, sir. Thank
23 you.

24 CHAIRMAN FUGE: Okay. Thank you. Yes.
25 So my question is -- wells that you have problems

1 with. So I just want to know what happened -- you do
2 not encounter the same problems. Or even if you
3 encounter them, do you have a strategy?

4 THE WITNESS: Yeah. David White with
5 Geolex will address some of that in his testimony, but
6 we do believe that we will encounter the problems
7 again. But as it relates to the instability below the
8 surface casing, we plan to address that by putting an
9 additional string through that zone, as well as an
10 additional string through the Capitan Reef. And that
11 should, and we believe it will, mitigate those issues.

12 CHAIRMAN FUGE: And I only had one
13 question. You had mentioned the Devonian well is
14 moving forward, and that being permitted, you're
15 looking forward to drilling and development, or are
16 you moving forward with the approval for it?

17 THE WITNESS: Moving forward with the
18 approval for it. We have submitted the application.

19 COMMISSIONER BLOOM: Mr. Chair, I'm
20 sorry, we've got to call on User 15. If that person
21 could mute; we're getting a lot of road noise. Maybe
22 we just mute everybody that's not presenting.

23 CHAIRMAN FUGE: I just took care of
24 that.

25 COMMISSIONER BLOOM: Thank you.

1 CHAIRMAN FUGE: The only ones on are
2 commissioners or people who were just in no-audio
3 mode. Okay?

4 COMMISSIONER BLOOM: Thank you.

5 CHAIRMAN FUGE: I don't believe there
6 are any further questions.

7 Thank you.

8 THE WITNESS: Thank you.

9 CHAIRMAN FUGE: You have another
10 witness, Ms. Hardy?

11 MS. HARDY: I do. Mr. Chair, we would
12 call David White of Geolex.

13 CHAIRMAN FUGE: May I ask the court
14 reporter to administer an oath for Mr. White?

15 THE REPORTER: Yes.

16 Please raise your right hand.

17 WHEREUPON,

18 DAVID WHITE,
19 called as a witness, and having been first duly sworn
20 to tell the truth, the whole truth, and nothing but
21 the truth, was examined and testified as follows:

22 THE REPORTER: Thank you.

23 You may proceed.

24 MS. HARDY: Thank you.

25 //

EXAMINATION

BY MS. HARDY:

Q Can you please state your full name for the record?

A David Allan [ph] White.

Q And where do you reside?

A Albuquerque, New Mexico.

Q By whom are you employed, and in what capacity?

A Geolex, Incorporated. I am a senior geologist and vice president.

Q Are you familiar with the matters addressed in Salt Creek's application?

A I am.

Q Have you previously testified at a Commission hearing?

A I have.

Q Can you briefly summarize your educational background and experience?

A I received my bachelor's degree, Bachelor of Science in Earth and Planetary Sciences from the University of Tennessee. I did my master's work, a Master of Science at the University of New Mexico. And -- I'm sorry, could you say the last part again?

Q Just summarize your educational background

1 and professional experience.

2 A And I've been working with Geolex, which is
3 an environmental consulting firm that has really
4 developed a specialty in acid gas injection well
5 design, since 2018, where we've focused on permitting
6 and regulatory compliance, design, and construction of
7 acid gas wells, as well as addressing complex
8 environmental matters.

9 MS. HARDY: Mr. Chair and
10 commissioners, I would request that Mr. White be
11 recognized as an expert in petroleum geology.

12 CHAIRMAN FUGE: Any objections?

13 UNIDENTIFIED SPEAKER: No objections.

14 CHAIRMAN FUGE: Mr. White is recognized
15 as an expert.

16 MS. HARDY: Thank you.

17 BY MS. HARDY:

18 Q Mr. White, I have put up a slide that
19 summarizes Salt Creek's requests. Can you please
20 summarize those, please?

21 A Yeah. And I think the prior witness, John,
22 also gave a good introduction into what the specific
23 request it was. And that being that Salt Creek is
24 requesting amendment of existing Commission orders
25 20913-C and -D, as it applies for, first, permission

1 to redesign Salt Creek AGI number one to specifically
2 address issues and challenges that were faced while
3 Salt Creek was trying to drill via the original
4 design.

5 Second, to authorize or provide approval for
6 relocation of the new well or the next attempt at that
7 AGI well to a different position on the facility
8 property, such that it makes sense from a facility
9 design standpoint, centralizing AGI operations in one
10 location, as well as giving the ability to be
11 separated from the existing plugged well, which we'll
12 talk about.

13 And then finally, approval of a 24-month
14 extension to that resultant permit to allow time to
15 prepare for drilling, actually drilling and completing
16 that well, and commercializing and readying the
17 facility.

18 Q Can you please describe this facility and
19 the well location?

20 A Sure. So the facility in question is in
21 southern Lea County, New Mexico, and both the gas
22 processing, gas treatment operations and Salt Creek
23 AGI number one are located in section 21,
24 approximately seven and a half miles southwest of Jal.
25 So that would be section 21 of township 26 south,

1 range 36 east.

2 The original drilling location, which we'll see
3 in the next slide here specifically where it is, is on
4 kind of the northern margin of the facility. And
5 we'll see the new location -- if you can advance the
6 slide one? You'll see the relationship of the orange
7 well icon showing the as-drilled location, and then
8 where we are proposing the new location to be.

9 All of this will remain within the bounds of the
10 Salt Creek facility property, and, you know, won't
11 result in any infrastructure moving outside of that
12 facility, which is fenced and secured. And then we
13 show the specific coordinates of those locations, both
14 the as-drilled and the proposed new location.

15 Q Can you please summarize the permitting and
16 order compliance history for this well?

17 A Yeah. So Salt Creek and -- I know we've
18 talked about this a little bit, but Salt Creek was
19 initially authorized in 2020 through issuance of order
20 R-20913-C. The specifics of this approval authorized
21 Salt Creek to inject up to eight million standard
22 cubic feet per day at the 2,149 maximum allowable
23 surface injection pressure.

24 Following that approval, based on actual
25 operations of the facility and as John, the prior

1 witness, had mentioned, predominantly sweet gas
2 operations. The well was not drilled immediately, and
3 ultimately the order authorizing its operation
4 expired.

5 So in December -- December 28th of 2020, the
6 Commission issued order R-20913-D, which reinstated
7 that injection authority. And it did have some
8 specific conditions added at that time for -- which
9 were important in Salt Creek's attempt.

10 Specifically, order version D required, prior to
11 Salt Creek spudding this well, to reevaluate the area
12 of review and submit the results of those findings to
13 the Division, as well as to provide notification to
14 any new interested parties that were new from the time
15 of the original hearing.

16 Additionally, the order D required the redundant
17 deep Devonian AGI well application be submitted with
18 the spud notice of the AGI number one well. So --
19 excuse me. To summarize the -- with respect to
20 planning and execution of operations to drill AGI 1,
21 Salt Creek has remained compliant with all actions
22 required to date within those respective orders.

23 Q Can you describe some of the benefits of the
24 proposed AGI well?

25 A Yeah. And the -- I mean, in general, the

1 project has great environmental benefit in that while
2 it may be motivated, or these projects may have a lot
3 of benefit in their ability to handle H₂N, hydrogen
4 sulfide, in a safe manner, they also handle and
5 dispose of a lot of carbon dioxide, which ultimately
6 is a great environmental benefit to these types of
7 projects.

8 In general, these projects reduce waste and air
9 emissions, providing facilities more operational
10 stability, and are ultimately, as we've seen, better
11 systems -- more reliable systems than alternatives
12 such as sulfur recovery units.

13 Based on the forecasting and Salt Creek's
14 conversations around this facility and what it needs
15 in terms of disposal, this well has benefits in that
16 it will provide acid gas disposal for this area that
17 is likely -- or forecasted to be necessary in the
18 future.

19 Specifically -- and actually you'll have to
20 forgive me, there's an error in this; but based on its
21 permitted volumes, the eight million standard cubic
22 feet per day, that ultimately results in 380 tons of
23 CO₂ and 80 tons of H₂S being sequestered each day.

24 You'll have to forgive me, there's a typo in
25 there. Those are not metric tons, those are tons.

1 Q Trying to go to the next slide. There we
2 go. Yeah. Okay. Can you please discuss the drilling
3 operation consultation with OCD and the well's current
4 status?

5 A Absolutely. So in one of the first slides,
6 we had kind of a breakdown of the history of drilling
7 AGI number one, but just to kind of reiterate that
8 again, Salt Creek AGI number one was spudded on
9 October 18th, 2022. The original well design included
10 two casing strings, with the surface casing string
11 being set at the top of the Ressler [ph] formation at
12 about 2,100 feet.

13 The well was spudded, and that surface casing
14 interval was drilled successfully. Casing was set and
15 cemented successfully by October 22nd. While drilling
16 past that point in the production casing interval, we
17 experienced two really significant things.

18 In the interval of Ressler [ph] formation, you
19 know, just below 2100 feet or so, we started to see
20 intervals of borehole instability. And this is
21 confirmed to be within the Ressler [ph] formation from
22 caliper logs and things that were run in the original
23 open hole of the production casing interval.

24 And then, subsequently, we also saw severe lost
25 circulation zones in the interval of the Capitan Reef.

1 And ultimately combined, those two vertical intervals
2 of lost circulation and then borehole instability
3 above made it very difficult to drill the well.

4 And ultimately, production casing became stuck
5 while trying to run. The well was drilled to the
6 total depth targeted, and casing became stuck while
7 trying to install that in the well.

8 Despite multiple attempts being made to remove
9 that casing, whether through, you know, bringing in
10 equipment able to do lift -- provide more lift to the
11 casing, trying to displace mud around the casing and
12 trying to get it free; ultimately, the casing was
13 parted in the original well bore and left in the hole.

14 In addressing this, Salt Creek, Geolex, and --
15 had consulted with the NMOCD on the appropriate next
16 steps to plug this, understanding that plugging and
17 sidetracking of the well may be a viable option, and
18 began discussions with the OCD to develop that plan.

19 And so, after those consultations, plugging of
20 the borehole was approved, a plan was submitted via
21 C103, and plugging of the borehole was approved on
22 November 16th. An important part of those plugging
23 plans is that these operations were to be completed
24 with utilizing corrosion-resistant cement slurries,
25 because of the nature of this being an acid gas

1 injection well.

2 So as you can see in the table on this slide,
3 which summarizes generally the plugging operations
4 that were completed, much of that across the lower
5 wellbore section was done so with corrosion-resistant
6 slurries.

7 And so in the next slide, you'll see, again, a
8 summary of the cement operations that were completed,
9 but this time, alongside a plugging diagram that was
10 produced which shows, basically, the intervals and
11 what materials were utilized for those plugging
12 operations.

13 So in the shallow sections when we're out of the
14 zones of the Capitan Reef, out of the zones of the
15 proposed and approved injection interval in the
16 Delaware Mountain Group, we have continuous coverage
17 -- or we have cement plugs utilizing house MC [ph]
18 cements in the shallow sections, but everything below
19 a depth of 3,028 was completed utilizing Halliburton
20 corrosive -- corrosion-resistant slurries.

21 So in this slide, following -- in doing that, as
22 we've stated before, Salt Creek has maintained
23 discussions with the Division to make sure an
24 appropriate plan and operations are completed
25 successfully. And so after the initial plugging of

1 the wellbore, the original wellbore which had casing
2 lost in it -- stuck casing lost in it, the approved
3 plugging plan was carried out utilizing corrosion-
4 resistant cement.

5 And then OCD was consulted again to essentially
6 verify that the plan had been conducted successfully
7 prior to considering Salt Creek's subsequent request
8 to sidetrack the well.

9 So in this slide, you can see the proposed side
10 track diagram, which began in December of 2022,
11 reaching a measured depth of 5,111 feet on December
12 17th. However, the combined -- as John had mentioned
13 earlier, the prior witness, the combined hazards of
14 wellbore instability above and lost circulation
15 ultimately resulted in the drill string becoming stuck
16 while drilling the side track.

17 So, you know, this was done ultimately -- the
18 operations that Salt Creek were attempting prior to
19 the drill string becoming stuck were to proactively
20 cement the intervals of loss. And ultimately, the
21 conditions above and -- with wellbore instability and
22 lost circulation, resulted in sticking of the drill
23 string during those cementing operations. So the
24 drill string was hydrostatically stuck and cemented in
25 place.

1 Q This is Slide 14. Can you describe the
2 proposed redesign of the well?

3 A Actually, if you can back up -- I'm sorry, I
4 forgot one thing. Apologies. With the information
5 that's provided on here, it's just small. I missed a
6 bit.

7 So once the drill string was cemented in place,
8 obviously, Salt Creek recognized that the side track
9 wellbore was not going to be something that was
10 salvageable either. So again, reached out and
11 consulted with NMOCD, UIC technical staff, to assure
12 an appropriate plugging plan is in place. So
13 following that, the drill string was cut off, and
14 plugging operations in a similar fashion using
15 corrosion-resistant cements were utilized to plug the
16 side track wellbore.

17 Q Now let's talk about the redesign of the
18 well.

19 A So with the conditions that were experienced
20 at this location, obviously it has made it very
21 challenging to drill and complete the AGI number one
22 well as proposed, or as originally approved. However,
23 Salt Creek is still of the opinion that for handling
24 H2S and CO2 at this facility, an AGI well is the most
25 preferable and safest handling method.

1 The use of these types of wells increases the
2 safety and reliability of operations, has the
3 environmental benefits we've discussed previously, and
4 ultimately, results in significant volumes of CO2 and
5 H2S being disposed of.

6 But ultimately, Salt Creek has realized that for
7 a well like this in this location, there needs to be
8 some physical changes to the well in order to make
9 drilling and completion operations successful.

10 So in this slide, you can see a well schematic
11 for the proposed redesign.

12 Q And this is slide 15; yes?

13 A Yes. This is slide 15.

14 And so the -- what Salt Creek is specifically
15 requesting is the addition of two casing strings,
16 which do not augment the two existing strings in any
17 way, but rather, add two larger casing strings to the
18 design that will serve the same -- or allow for the
19 physical isolation of the two intervals in which
20 hazards were encountered.

21 So the first casing string, much like in the
22 first attempt to drill the well, will be the surface
23 casing protecting shallow groundwater resources. The
24 first intermediate casing string, the 13 3/8-inch
25 casing string that's shown here, will extend to an

1 approximate depth of 3,100 feet and physically isolate
2 the intervals where wellbore stability issues were
3 encountered.

4 The second intermediate casing string, the 9 5/8-
5 inch, will specifically isolate the intervals of fluid
6 loss. And then subsequently or lastly, the seven-inch
7 production casing will extend down to the base of the
8 approved injection zone, as originally designed.

9 It's important to note that while these two
10 additional casing strings are being added to provide
11 those physical barriers, all of the other critical AGI
12 design considerations, such as the use of corrosion-
13 resistant alloy materials, downhole equipment,
14 utilizing corrosion-resistant materials, all remains
15 unchanged. The only change that is occurring is to
16 add larger casing strings -- two additional larger
17 casing strings.

18 When completing the well in this way, and when
19 attempting the drilling of the first well location, we
20 have and continue to drill the well, perforate the
21 well, and complete it in accordance with prior
22 conditions of approval that required a specific
23 vertical separation between the Capitan Reef and the
24 injection zone.

25 Q And let's look at slide 16. How will the

1 well, in its new design and location, avoid
2 interference with the original well?

3 A So with -- and this really relates to Salt
4 Creek's request to relocate specifically to a location
5 120 feet southeast in order to both provide separation
6 from the existing plugged wellbore, as well as to
7 maintain surface operations, maintain AGI operations
8 at a location suitable on the facility that keeps
9 facility personnel safest.

10 So the proposed well location southeast of the
11 existing well provides Salt Creek that, and that all
12 AGI processes can be organized on the property and the
13 lengths of any associated lines can be minimized.

14 Because there is a plugged wellbore with a
15 plugged side track in close proximity, Salt Creek, in
16 drilling at the new location, will conduct anti-
17 collision surveys and utilize directional tools to
18 make sure that the position of the new well with
19 respect to the old well and the separation from those
20 two wells are maintained.

21 And so, as it's been expressed by the OCD, and
22 the importance of preserving the well records with
23 respect to this project, in maintaining those accurate
24 records, we wouldn't expect any revision of the Salt
25 Creek AGI number one well. That well would officially

1 -- and we'll file -- we propose would be officially --
2 would be maintained, and this new location would be
3 given a new API number. Salt Creek would file
4 appropriate NMOCD forms to get a new well record
5 generated, a new API number.

6 Q And did you update your evaluation regarding
7 fault lift potential?

8 A We did. And in preparing the C108 in
9 general, we reached out to OCD to make sure that an
10 amendment application would include all of the
11 additional supplementary materials that are most
12 appropriate for this type of request, and not only the
13 approval to redesign and relocate.

14 So updating, taking an additional look into the
15 injection operations in the area, ongoing in the
16 Delaware Mountain Group, was one of those materials
17 that we also agreed upon providing.

18 So with this amendment application, the project
19 area was re-evaluated with respect to the potential
20 for induced seismicity. The components of that
21 assessment involved -- well, for this particular
22 assessment, for the amendment application, it was
23 foundationally based on review of seismic survey data
24 that was completed in 2019 and 2020 for the original
25 permit.

1 This evaluation of the subsurface was utilized to
2 construct the fault slip probability model, the
3 structures in the area, and ultimately, simulations
4 were ran to assess fault slip probability risk, based
5 on the current wells operating.

6 So in this slide, we show the -- kind of a high-
7 level view of the project area with two faults that
8 were identified as a result of that seismic review.
9 These faults are northwest striking, and for the
10 purposes of representing them in fault slip
11 probability models, were broken up into six fault
12 segments.

13 Also shown in this map are the injection wells
14 that are authorized or active within the Delaware
15 Mountain Group in this area. These wells are
16 annotated by their API number, as well as their
17 authorized daily injection volumes. As you can see,
18 there are four active and new DMG wells in the general
19 area with permitted volumes of 5,000 to 35,000 barrels
20 per day.

21 Q Can you describe the model input and the
22 simulation conditions that you used?

23 A Yeah. So in assessing fault slip
24 probability and induced seismicity risk, we utilized
25 the Stanford Center for Triggered -- Induced and

1 Triggered Seismicity's fault slip potential model.
2 This model first uses input parameters that describe
3 local stress, faults in the area, fault geometries,
4 and their orientation to determine how much of a
5 pressure increase at the center of these features
6 would be required to induce motion.

7 In general, the features that have been
8 identified in the area of the Salt Creek AGI well are
9 nearly vertical to steeply dipping features that
10 generally strike northwest to southeast. And the two
11 -- taking a look at the two tables to the right, we
12 summarize the model input parameters that we utilized
13 for the fault slip probability assessment, as well as
14 all of the wells and specific key details about those
15 wells and their operation.

16 In our simulations, to assure the results of
17 those simulations are conservative, all of the wells
18 were simulated assuming they would inject at their
19 maximum daily rate day in and day out.

20 Q What conditions were required to induce
21 fault slip?

22 A So as I mentioned in the previous slide,
23 from information and details about local stress
24 conditions and fault geometries, the first step that
25 the FSP model takes is utilizing those parameters and

1 determining what pressure increase, in psi, would be
2 required to induce motion along those features.

3 And as shown in this table, or for the Salt Creek
4 AGI Well Induced Seismicity Assessment, this table
5 shows those model-calculated pressures for the six
6 fault segments in the project area.

7 These subsurface features -- and maybe it's --
8 subsurface features in this area striking northwest
9 are not aligned with directions of maximum horizontal
10 stress, and so it makes sense that these pressures are
11 in the -- as you can see, ranging from 1960 psi
12 upwards of 2350 psi.

13 The segment 5, as shown in the previous map,
14 exhibits the lowest core pressure increase required to
15 induce slip, but ultimately, it's anticipated that
16 this threshold is still significantly higher than what
17 the current makeup of injection wells in the area
18 would produce.

19 Q Can you talk about the simulation results?

20 A Yes. So the next step in the model, or
21 using the fault slip potential model, is to conduct a
22 hydrologic simulation where the operation of those
23 wells in the project area is simulated in order to
24 predict what type of pressure influence they will
25 have. And the results of that hydrologic model are

1 shown in the various panels, A and B in this slide,
2 slide 21.

3 And after 30 years of simulated injection, the
4 fault slip potential model estimates for pressure
5 increase along the midpoint of faults ranges between
6 44 and 93 psi. Each of those fault segments, the
7 pressure conditions at their midpoints is shown in the
8 six trends in panel B, and then ultimately, the
9 pressure map is shown in panel A.

10 In general, the results of the hydrologic model
11 and their comparison to the pressures required to
12 induce slip, the injection of these six wells as
13 permitted in this conservative simulation of them
14 operating at their maximum pressures; ultimately, what
15 the model predicts as being the actual pressure
16 increase falls significantly short of what the
17 geomechanics of this model determination would suggest
18 would be required to induce slip.

19 These results, ranging from -- sorry, it's on the
20 next slide. From about 44 psi to 94 represents about
21 two to four percent of the pressure required to induce
22 slip.

23 And so in this slide, we see another view of the
24 results. We see in panel A, the model's predicted
25 fault slip probability. Because of the minimal

1 increase that the model predicts along each fault, and
2 the significantly higher core pressure increases
3 required to induce slip, naturally, the model predicts
4 zero probability for the six fault segments that were
5 modeled.

6 In panel B, to the right, we see kind of an
7 aerial view that summarizes the location of the two
8 faults, represented by six fault segments, the FSP
9 model's prediction of pressure increase following
10 injection by these SWD and AGI wells, and then the
11 location of those wells in map view.

12 And just to summarize that, the results of this
13 slide and the prior slide, the model under these
14 conditions and for these features which have been
15 identified does not predict any probability of slip
16 for the injection scenario simulated, and it is
17 anticipated that operation of Salt Creek's AGI number
18 one well as proposed does not represent an increased
19 risk for injection-induced seismic events.

20 Q This is slide 23. Can you describe the
21 relationship of the AGI number one to seismic events
22 -- fault areas?

23 A That's correct. And here we take kind of
24 the results of those -- making sure we have an
25 understanding that those results are reasonable. So

1 kind of the next appropriate step is to look into the
2 area with respect to historic seismic events, and also
3 with respect to the Division's seismic response areas,
4 which have been defined based on areas of significant
5 or increased seismic activity.

6 So in the map, we show the location of the AGI
7 number one well, in township 26 south, range 36 east,
8 kind of towards the base of that map. The NMOCD's
9 induced seismicity response areas are shown by the
10 gray polygons -- circular polygons.

11 So we can see that the Salt Creek AGI facility
12 and wells are located at a pretty significant distance
13 from those areas in which seismic events have been of
14 concern and response protocols are expected in
15 response to qualifying seismic events.

16 Additionally, we have plotted on this map the
17 United States Geological Survey records of earthquakes
18 from 1973 to the present, so we can see that not only
19 does the AGI number one location and the Salt Creek
20 facility not exist -- or is not located near areas of
21 problematic or near the seismic response areas, but
22 also does not exhibit any history of repeated seismic
23 events.

24 Q And what did you conclude as the result of
25 your fault slip analysis?

1 A That based on the current authorized or
2 active Delaware Mountain Group injection operations in
3 the area, and the results of our investigation of
4 faults in the area, that the operation of those wells
5 as proposed and as permitted will not produce induced
6 seismic events or elevate the risk for induced seismic
7 events in this area.

8 Q Let's look at slide 24, which talks about
9 the area of review. Did you update the area of review
10 for this well?

11 A We did. We did. We updated the area of
12 review -- or reinvestigated the area of review to
13 understand operations in the area, to identify new
14 operators, or new interested parties who may not have
15 been contacted in the original application or notified
16 in the original application, as they were not
17 interested parties.

18 And this map summarizes kind of the one-mile area
19 of review for the Salt Creek AGI number one location
20 that is proposed. Within that one-mile space, there
21 are 58 wells, 22 of which are active, 14 are
22 permitted, and 22 are plugged. This area is generally
23 characterized new production by Bone Springs and
24 Wolfcamp Plays, which underlie the approved Delaware
25 Mountain Group injection zone, but the area does have

1 some marginal handful shallower -- marginal production
2 from shallow wells.

3 Within the area of review and shown by the red
4 arrows on the map, there are seven wells that
5 penetrate the Delaware Mountain Group with -- and
6 looking at the map key there, you'll see that many of
7 these are -- that are denoted by the red arrows are
8 Bone Springs or Wolfcamp production, underlying the
9 Delaware Mountain Group.

10 Q And have you reviewed Ameredev's pre-hearing
11 statement?

12 A I have.

13 Q And have additional producing wells been
14 permitted in the area of review since Salt Creek's
15 application was initially heard?

16 A Yes. There are additional Bone Springs and
17 Wolfcamp permits that have been approved -- I can't
18 point to them. And we can discuss them. So
19 generally, a lot of the oil new shown in this map, may
20 of those are new permits for producing wells in the
21 area, with the exception of the cluster to the
22 southwest corner of section 21, and then some of those
23 just across the section line in section 27.

24 Q In your opinion, will the proposed AGI well
25 have any impact on wells within this area of review

1 that penetrate the injection interval?

2 A So from work we've completed in the past
3 with respect to these proposed operations being --
4 well, that were included in the original C108
5 application, you know, part of that investigation
6 involved running some volumetric modeling based on the
7 proposed operation of this well and our understanding
8 of the reservoir properties in this area.

9 And looking back on those results, it doesn't --
10 those results are not indicative of the AGI plume
11 interacting or encountering the vertical portions of
12 the wellbores of these underlying Bone Springs and
13 Wolfcamp producers. Additionally, the Commission's
14 prior requirements to transition this to a redundant
15 well will also minimize the amount of volume that goes
16 into this well.

17 And so, when combined with the original results
18 for 30 years of operation of this well not
19 encountering adjacent wellbores, combined with the
20 fact that a second redundant Devonian well will be --
21 or a second Devonian well will be installed and the
22 transition of this operation to a redundant -- I don't
23 believe that it poses any risk.

24 Q And has Salt Creek agreed to comply with
25 OCD's permit conditions?

1 A Yes. With respect to their proposed permit
2 conditions in this case, yes. Absolutely.

3 Q And will those permit conditions also help
4 ensure that there is not a detrimental impact to
5 surrounding wells?

6 A They will.

7 Q Can you also respond to Ameredev's concerns
8 regarding the Capitan Reef?

9 A Yes. And so, again, one of the original
10 conditions of approval for this well required that a
11 significant amount, no less than 500 feet, of vertical
12 separation be maintained between the top injection
13 perforation in the well and the base of the Capitan
14 Reef or reef-equivalent strata.

15 And so, when drilling the original AGI number one
16 well, prior to having to plug and abandon those
17 wellbores, the well was drilled to total depth, and
18 Salt Creek and OCD discussed the results of those logs
19 to identify those critical intervals; where the base
20 of the Capitan Reef is, where the first perforation
21 could be; and so we think that those conditions of
22 approval will maintain protection of the Capitan Reef,
23 as well as intervals of low porosity, low
24 permeability, that we observed in the lower section of
25 the Capitan Reef, which we believe represent four reef

1 strata -- four reef sediments that are generally low-
2 permeability and low-porosity.

3 Q And based on your experience and
4 understanding, has the initial well been appropriately
5 plugged?

6 A Yes, I believe it has. And -- the original
7 wellbore and the sidetrack wellbore. These operations
8 were completed, you know, with the input of the
9 Division, you know, these plugging operations utilized
10 corrosion-resistant slurries that were appropriate for
11 this and appropriate for isolating the Delaware
12 Mountain Group injection reservoir, where, you know,
13 corrosive conditions may develop.

14 And these operations were completed, you know, to
15 provide as much coverage behind and within -- behind
16 casing in the well, as well as in the wellbore. So
17 yes, I believe they are adequate.

18 Q And will the plugging of the initial well
19 and the side track ensure that there is not
20 communication between the injection interval and the
21 Capitan Reef from those wells?

22 A Yes.

23 Q Look at slide 25. Did you also update the
24 land and surface ownership information?

25 A Yes, in addition to re-evaluating oil and

1 gas operations and injection operations in the project
2 area, Salt Creek and through work completed by the
3 Schoeffler Energy Group, re-evaluated Lea County land
4 records to make sure all surface owners and interested
5 parties were identified such that they could be
6 provided notice and copies of the application, notice
7 of hearing.

8 In the map, we show, utilizing polygons, the --
9 within the one-mile area of review, state and private
10 lands where operators and leases -- or federal and
11 state leases are located. And then in the formal C101
12 application, for which these slides are representing,
13 all of the notification documents and proofs of
14 deliveries -- well, the notification documents are
15 included in the C108 application. Drafts of those,
16 and then the proof of delivery have been submitted for
17 exhibits today.

18 Q And let's look at those exhibits for a
19 moment. Are those documents included in Exhibit D?

20 (Salt Creek Exhibit D was marked for
21 identification.)

22 A Yes, they are.

23 Q And does Exhibit D include the notice
24 exhibits for both of these cases?

25 A Yes, they appear to.

1 Q Based on those exhibits, was notice provided
2 to all affected parties?

3 A Yes.

4 Q Okay. Let's look next at slide 26. Can you
5 please summarize Salt Creek's amendment application?

6 A Yes. so the amendment application -- or,
7 despite challenges in drilling AGI number one, Salt
8 Creek maintains that utilization of an AGI well to
9 dispose of their waste acid gases remains the best
10 handling method -- remains the best solution for their
11 facility.

12 Summarizing the attempts to drill the well,
13 drilling operations began in October 2022; however,
14 subsurface conditions by way of lost circulation and
15 wellbore instability resulted in the need to plug and
16 abandon the original well location.

17 Subsequently, these conditions persisted in
18 attempts to sidetrack the wellbore, and ultimately
19 resulted in the need to plug and abandon totally that
20 surface location. To address these subsurface issues
21 and ensure Salt Creek can successfully drill the AGI
22 number one well, we are proposing utilization of two
23 additional casing strings to physically isolate those
24 wellbore instability intervals, as well as the lost
25 circulation zones.

1 This change, by providing physical isolation of
2 these intervals, allowing one problem at a time to be
3 handled, will significantly improve Salt Creek's
4 ability to drill this well successfully. As we do
5 need to maintain appropriate distance from the plugged
6 well, we also are -- Salt Creek proposes to relocate
7 the AGI well to a new location, about 120 feet to the
8 southeast, where it will remain centralized to related
9 acid gas injection operations like compression,
10 process units, and minimize flowing of high-pressure
11 acid gas across the facility.

12 In planning to drill and complete AGI number one,
13 as we had discussed before, Salt Creek has remained
14 compliant from a regulatory perspective, and the
15 conditions of approval and former -- in the prior
16 Commission orders.

17 As we discussed in the previous slide, Salt Creek
18 has also re-evaluated the AGI well area of review with
19 respect to the amended surface location. This
20 includes evaluation of the wells that are in place,
21 which are approved, and then have also re-evaluated
22 land records to ensure all interested parties have
23 been identified and provided notice of the hearing and
24 notice of the application.

25 And also, re-evaluated induced seismicity risk in

1 the area, based on the current landscape of injection
2 operations in the Delaware Mountain Group. The
3 results of these additional induced seismicity
4 assessments confirm the findings of the original
5 application, in that the faults and subsurface
6 features in this area do not pose an increased risk
7 for injection-induced slip, based on the injection
8 simulation presented, which includes saltwater
9 disposal wells as well as the proposed AGI well.

10 Q This is slide 28. Can you please summarize
11 Salt Creek's request of the Commission?

12 A Yeah. And so Salt Creek specifically
13 requests amendment of the NMOCC order R-20913 in order
14 to provide them the ability to successfully drill and
15 complete the Salt Creek AGI 1 well. The first
16 specific request is approval to redesign the -- to
17 revise the well design to incorporate two additional
18 casing strings, which will physically isolate the
19 intervals of borehole instability and lost circulation
20 that were encountered.

21 Salt Creek also requests approval to relocate the
22 AGI number one well to a new surface location within
23 the existing plant property. To preserve regulatory
24 records, this new location will be -- a new C101
25 application for permit to drill will be submitted to

1 assign a new API number and generate a new well file.

2 This location will also allow the operations and
3 the design of the surface facility to continue to
4 allow for safe AGI operations on the facility.

5 And finally, Salt Creek is requesting approval to
6 the deadline to commence injection through AGI 1 until
7 24 months from the approval date of this application,
8 which will allow them sufficient time to acquire the
9 necessary AGI materials, conduct drilling and
10 completion, and commercialize the facility.

11 Q In your opinion, will granting Salt Creek's
12 application protect correlative rights, prevent waste,
13 and protect human health and the environment?

14 A I do.

15 MS. HARDY: I have no further questions
16 for Mr. White. I would move the admission of Salt
17 Creek Exhibit D, including exhibits D1 through D3.

18 CHAIRMAN FUGE: Any objections?

19 UNIDENTIFIED SPEAKER: No objections.

20 CHAIRMAN FUGE: Exhibits are admitted.

21 Mr. Tremaine, do you have cross?

22 (Salt Creek Exhibit D was received into
23 evidence.)

24 MR. TREMAINE: I do not.

25 CHAIRMAN FUGE: And Ms. Bennett, with

1 respect to Ameredev -- do you have any questions for
2 the witness?

3 MS. BENNETT: No, I do not.

4 CHAIRMAN FUGE: Commissioner Ampomah,
5 Commissioner Bloom, any questions?

6 COMMISSIONER BLOOM: Mr. Chair, no
7 questions at this time.

8 CHAIRMAN FUGE: Okay.

9 COMMISSIONER AMPOMAH: Yeah, I do have
10 multiple. So the first question -- what of the --
11 assessment that was done on the well -- that was not
12 successful?

13 UNIDENTIFIED SPEAKER: I'm sorry. I
14 can't hear Dr. Ampomah again. I'm so sorry.
15 Mr. Chair?

16 CHAIRMAN FUGE: -- look at it.

17 COMMISSIONER AMPOMAH: Is that better?

18 UNIDENTIFIED SPEAKER: Sounds good.

19 Yeah. Just keep talking loudly. Thank you,
20 Dr. Ampomah.

21 COMMISSIONER AMPOMAH: So I'm more
22 concerned, you know, about -- drilling beneath the new
23 location is successful. Right. So the question is,
24 what kinds of assessment have you done to make sure
25 that that issue is not encountered again?

1 THE WITNESS: Well, I mean, the -- with
2 respect to drilling the well, there was really only
3 the opportunity to drill or to collect through-bit
4 geophysical logs and the mud logs. And so
5 ultimately, those, you know, down-hole measurements
6 were, you know, led us to looking at, "Okay, here's
7 what caliper logs look like," here's what we were
8 experiencing in loss zones and materials that were
9 becoming problematic and sticking off -- packing off
10 the drill string from above, so the geophysical logs
11 and ultimately, drilling the well, and the conditions
12 experienced is, you know. Has resulted in the
13 decision to isolate those through casing.

14 COMMISSIONER AMPOMAH: So I'm
15 understanding that you did analysis looking at -- lost
16 from the nearby wells, in divining this particular
17 well? Or is data that you going to collect from this
18 particular well?

19 UNIDENTIFIED SPEAKER: I didn't catch
20 that --

21 THE WITNESS: I'm sorry, say again?

22 COMMISSIONER AMPOMAH: When I talk
23 about the -- analysis, I mean did you look at
24 consistent wells in that area and then look at the
25 well -- the rocks that are below, did you actually

1 perform, like, something like -- what was -- analysis?
2 To see what -- what should be -- you know, how should
3 we drill this well to avoid facing the same problems
4 that you had --?

5 THE WITNESS: Well, so, the -- in
6 drilling the well, there was a mud program developed
7 with respect to -- or with service providers, mud
8 service providers. With respect to prior to drilling
9 this well, the wells were certainly evaluated with
10 respect to those penetrating the Delaware Mountain
11 Group. But ultimately, those didn't -- we relied on
12 the input from mud companies, mud engineers whom drill
13 in this area to design the mud program.

14 COMMISSIONER AMPOMAH: So are you
15 saying that the problem that you encountered was first
16 of its kind? Like no one has drilled in this area
17 that encountered similar problems?

18 THE WITNESS: Well, I don't know if I
19 would say it's new, but I think it's -- in this
20 particular location, it was something where fluids
21 were being lost in the lower section and sticking was
22 occurring from above. Based on what we see in terms
23 of the way the caliper log looked.

24 COMMISSIONER AMPOMAH: So then the
25 question that we can ask will be, what -- you know.

1 So what lessons did we learn from -- well in such a
2 way that the new -- actually go though, because, like,
3 120 feet, I don't see how it's going to really drill
4 this well successfully. You are -- to really
5 understand what --

6 THE WITNESS: And I agree. I think we
7 expect that those hazards we encountered will still be
8 there at a location 120 feet. But ultimately, and
9 that is the motivation for the design request.
10 Dealing with them is isolating them.

11 COMMISSIONER AMPOMAH: So you've done a
12 great job on the new design, where you have two
13 intermediate pieces. Which is -- so you really need
14 -- but what about formation? Do you feel that
15 application's really a quick release, like where you
16 can successfully store acid gas without any compromise
17 of the -- or rest of the formation?

18 THE WITNESS: So yeah. Based on --
19 after drilling this well, we expect that -- and in the
20 original application in 2019 and 2020, we expect that,
21 you know, the reservoir displays characteristics
22 suitable for that, both in terms of storage as well as
23 the observation of what we see as four reef type, low
24 porosity, low permeability sediments that can contain
25 acid gas.

1 The hazardous intervals that we
2 encountered overlie those sections and the Ressler
3 [ph] formation where we saw wash out, wellbore
4 instability, and the interval of the Capitan Reef.
5 Those hazardous zones that we saw were -- are
6 significantly separated from the Delaware Mountain
7 Group injection zone, which we anticipate the top
8 perforation being at about 5500 feet.

9 COMMISSIONER AMPOMAH: So you're saying
10 that there is enough separation so -- in terms of
11 where you encountered these problems -- interval?

12 THE WITNESS: So the interval of what
13 we presume to be wellbore instability was beginning
14 right under the surface casing in the Ressler [ph]
15 formation, at about 2100 feet. Caliper logs kind of
16 seemed to indicate a couple hundred feet of pretty
17 significant issue there. The base of the Capitan Reef
18 with -- that we identified and NMODC UIC staff --
19 actually, let me back up.

20 We identified and OCD concurred that
21 the base of the Capitan Reef sediments were at 5,008
22 feet. And both OCD, Salt Creek, and Geolex agreed
23 that the top perf would be no shallower than 5580. So
24 there is -- we see separation. That is what OCD and
25 Geolex and Salt Creek agree the separation should be,

1 and that we also see at the base of the Capitan Reef,
2 that being characterized by low-permeability, low-
3 porosity four reef. So that seems significant
4 separation suitable for containment.

5 COMMISSIONER AMPOMAH: So then -- is
6 that you've done the analysis to be really confident
7 that even though we're having these problems in the --
8 we still have a containment, and then also we -- to
9 prevent the gas -- respective worry -- problems that
10 have been encountered drilling the well.

11 THE WITNESS: With the separation we
12 see from where losses and wellbore instability --
13 where those -- with the vertical separation we see, we
14 believe it's appropriate.

15 COMMISSIONER AMPOMAH: So let's talk a
16 little bit more about --. So you said that you
17 reviewed. So I just want to be clear on this, did you
18 review or interpret seismic -- to get at faults?

19 THE WITNESS: We viewed seismic survey
20 data.

21 COMMISSIONER AMPOMAH: But --

22 THE WITNESS: We interpreted faults
23 from that viewing.

24 COMMISSIONER AMPOMAH: So then, let me
25 ask you: What mechanism did you use in -- these

1 faults? Like what -- use in the interpreting of the
2 faults?

3 THE WITNESS: I was -- I mean, it was
4 observed offset in seismic data.

5 COMMISSIONER AMPOMAH: Can you clarify
6 that?

7 THE WITNESS: We were viewing seismic
8 survey data, and in evaluating the area, observed
9 visible offset in seismic --

10 COMMISSIONER AMPOMAH: Okay. Okay.
11 Okay. Were these locuses well logged?

12 THE WITNESS: So the -- where these
13 features were observed was, you know, three miles to
14 the east and northeast of the project area. So I
15 don't recall seeing it in well logs or, you know,
16 being clearly identified in structural mapping.

17 COMMISSIONER AMPOMAH: Let's talk a
18 little bit about the causative analysis that you did.
19 Looking at the parameters that you studied, what was
20 the minimum result of stress that was utilized?

21 THE WITNESS: So with the Stanford
22 fault slip probability model, in lieu of inputting
23 numeric horizontal stresses, you can also utilize the
24 AC parameter which characterizes it, and the
25 developers of that slip potential model have worked

1 the Permian Basin in order to inform what AC
2 parameters are appropriate for characterizing the
3 state of stress in different portions. So for this
4 one, the AC parameter utilized was .6.

5 COMMISSIONER AMPOMAH: And is that
6 equal, more or less, to the fracture pressure gradient
7 to you?

8 THE WITNESS: No.

9 COMMISSIONER AMPOMAH: Or do we look at
10 the -- pressure? In this area?

11 THE WITNESS: Well, I mean, it can
12 vary. I mean, in the Delaware Mountain Group, it can
13 be pretty -- we've seen it in wells we've drilled to
14 the south be pretty high, and we've seen it in wells
15 in which it's lower.

16 COMMISSIONER AMPOMAH: Well, then,
17 those submissions -- that you did, but actual
18 numerical observation to look at the plume. So I saw
19 that you used one-mile radius for your area of review.
20 Right? But -- actually be able to know the impact of
21 the plume unless the plume -- the pressure build up
22 and all of that -- definite numerical observation
23 should be utilized.

24 And that can more -- establish a
25 baseline for your five-year review --

1 THE WITNESS: That's correct, and I
2 think -- I mean, ultimately, one of the things to note
3 is this is, you know, has an approved order from 2020
4 in which the expectations for what we do now in new
5 AGI well applications were not the same. And
6 certainly, you know, that was one of the reasons for
7 focusing on -- or making sure we reach out to OCD
8 prior to preparing this amendment and abbreviated
9 application, so that those -- what is expected is
10 provided.

11 COMMISSIONER AMPOMAH: So now and then,
12 now I get it. I get that, clearly. So then, what
13 information are we going to get from this particular
14 well? -- Are we going to get any core data to also
15 have with related -- experiments to be able to --
16 calibrate our models that we attempt to do in the
17 future?

18 THE WITNESS: Yes. So in the approval
19 of the original well, you know, the plan as described
20 in the C108 was to conduct and collect all of the data
21 that we typically do for AGI wells that we typically
22 are requested for by the OCD and the commissioners.
23 So the -- we would expect that a revised location
24 would include those things, such as SMI logs or
25 collection of sidewall cores, things like that that

1 are typical of AGI approvals.

2 COMMISSIONER AMPOMAH: So my last
3 question will be on the --. So -- do you believe that
4 if OCD continues to give permits in this -- which
5 is -- injection of acid gas into this formation is
6 going to be very difficult to drill through those
7 formations to get -- which should be more -- aquifer
8 that we should -- now.

9 THE WITNESS: Well, certainly, I mean
10 -- certainly if production is going to be continued,
11 or if production operations are going to continue to
12 develop in this area, then yes, that is an issue.
13 Ultimately, the agency has authorized this interval
14 for acid gas injection, and would be a problem that I
15 don't think is specific only to this project, but, you
16 know, there are other shallow operations which would
17 be similarly needing to address these types of
18 questions.

19 COMMISSIONER AMPOMAH: Thank you,
20 Mr. Chair.

21 CHAIRMAN FUGE: No questions from me.
22 Any questions, Ms. Hardy?

23 MS. HARDY: No, thank you.

24 CHAIRMAN FUGE: I'm going to give a
25 five-minute break. -- for a five-minute break. We'll

1 wait a minute. I'm going to give a five-minute break
2 just to get some more water and go, and then we'll
3 proceed with OCD's information. So that means a
4 return at 1:15. Thank you.

5 THE REPORTER: Thank you.

6 (Off the record.)

7 CHAIRMAN FUGE: Sorry for the record,
8 we were muted. We are ready to resume. Mr. Tremaine
9 for the OCD presenting.

10 Turn it over to you.

11 MR. TREMAINE: Thank you, Mr. Chair and
12 commissioners. Salt Creek just provided a very
13 substantial background, including many of the points
14 of discussion that OCD engaged in with the operator.
15 So ultimately, OCD determined and you will hear today
16 that OCD feels that the application as revised with
17 the recommended conditions of approval that the
18 Division is recommending is adequate.

19 So I'm going to move pretty quickly
20 through, really, a summary assessment of OCD's
21 involvement through the testimony of Mr. Gebremichael,
22 but by all means, if there's any questions about that,
23 I don't mean to imply this to be cursory, just --
24 we're going to look through this pretty quickly. And
25 don't have any particular technical points which OCD

1 is contesting.

2 So I would call OCD's witness, Million
3 Gebremichael.

4 CHAIRMAN FUGE: Since Mr. Gebremichael
5 was sworn in in an earlier proceeding today, I'm not
6 going to have the court reporter swear him in again.

7 MR. TREMAINE: Thank you.

8 WHEREUPON,

9 MILLION GEBREMICHAEL,
10 called as a witness, and having been previously sworn
11 to tell the truth, the whole truth, and nothing but
12 the truth, was examined and testified as follows:

13 EXAMINATION

14 BY MR. TREMAINE:

15 Q Million, will you please state your name for
16 the record?

17 A Million Gebremichael.

18 Q And remind the Commission, where do you
19 work?

20 A I work for the Energy, Minerals, and Natural
21 Resource department as a part of the group responsible
22 for the oversight of the underground injection control
23 program for the Oil Conservation Division.

24 Q And what is your position title within that
25 group?

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1 A Petroleum Specialist Advanced in the
2 Underground Injection Control group.

3 Q And could you please provide a brief summary
4 of your job responsibilities?

5 A Yes. I review technical aspects of UIC
6 permits, provide recommendations to district offices
7 regarding UIC wells, and provide input and process
8 design and rulemaking.

9 Q And have you ever testified before the Oil
10 Conservation Commission?

11 A Not until earlier today.

12 Q And in that hearing earlier today, is it
13 true that you were recognized as an expert in the
14 field of petroleum engineering and underground
15 injection?

16 A Yes.

17 Q And have you prepared a curriculum vitae in
18 preparation for this hearing?

19 A Yes. It's OCD Exhibit Number 2.

20 Q And again, for the record, could you just
21 briefly summarize your --

22 CHAIRMAN FUGE: Mr. Tremaine, because
23 he did testify earlier today, aside from any objection
24 -- recognize Mr. Gebremichael as an expert in
25 petroleum engineering.

1 MS. HARDY: No objection.

2 CHAIRMAN FUGE: Okay.

3 MR. TREMAINE: Excellent. Thank you.

4 THE WITNESS: Thank you.

5 BY MR. TREMAINE:

6 Q Moving on. Mr. Gebremichael, have you
7 reviewed Salt Creek's amended application?

8 A Yes.

9 Q And when you are reviewing applications for
10 injection and in particular, acid gas injection wells,
11 can you please briefly outline for the Commission what
12 standard of review you apply when evaluating those
13 applications? What things are you looking for?

14 A Is your question any opinion on the
15 application, or what are the criterias that we're
16 looking for?

17 Q When you review applications for such AGI,
18 do you review the application for terms, "necessary to
19 prevent waste"?

20 A Yes.

21 Q And how about the protection of correlative
22 rights? Do you review applications for the protection
23 of correlative rights?

24 A Yes. Prevent waste and -- so it doesn't
25 impair any correlative rights and then prevent any

1 damage to the environment and health.

2 Q Thank you. And so in terms of -- with that
3 background of your review and assessment of the
4 application, could you please outline for the
5 Commission your opinion of Salt Creek's amended
6 application?

7 A Yes. As David White of Geolex extensively
8 described, Salt Creek has unsuccessfully attempted to
9 drill into the same location, which is 120 feet
10 surface location away from the current well location.
11 It has gathered enough information to mitigate the
12 issues encountered during the well construction of now
13 plugged and abandoned well.

14 OCD believes that Salt Creek new well design will
15 minimize the issues encountered. Those issues are, as
16 they were described, both, you know, borehole
17 instability and loss of circulations. They could
18 reduce the risk if not totally eliminate them.

19 Q Did OCD have any concerns with the amended
20 application and the proposed location and depth of the
21 AGI well?

22 A Yes. Given the reoccurring drilling issues
23 and then the possibility of impairing correlative
24 rights, and then fresh water sources, OCD has a
25 general reservation using DMG formation for disposal.

1 However, OCD believes that with proper well
2 design, the borehole instability and severe loss of
3 circulation in the Capitan Reef could be mitigated and
4 then DMG could be used for disposal with the special
5 conditions in place. And then those conditions are
6 exhibited in Exhibit number 1.

7 Q Right. And, Mr. Gebremichael, has OCD and
8 Salt Creek agreed to implementation of those
9 conditions you referenced to ensure compliance with
10 your standards of review?

11 A Yes.

12 Q And you referenced you have prepared Exhibit
13 1, listing those conditions; is that correct?

14 A Yes.

15 Q And then could you briefly, just very
16 briefly, summarize the conditions for the Commission
17 and whether or not they have been adopted by the
18 Commission in the past?

19 A Well, those conditions are adopted by the
20 Commission in the past. The conditions, they are the
21 OCD's standard conditions for approval of all AGI
22 wells. So those conditions are specifically tailored
23 for AGI wells in the state.

24 MR. TREMAINE: Mr. Chair, I would move
25 admission of OCD Exhibit 1 at this time.

1 CHAIRMAN FUGE: Any objections?

2 MS. HARDY: No objections.

3 CHAIRMAN FUGE: Admitted.

4 MR. TREMAINE: And if the Commission
5 wishes, we can place it on the screen, but I believe
6 everyone in attendance is familiar with the
7 Commission. I do anticipate a question as to the
8 manner in which, and which conditions kind of move
9 through the various orders, so if you'll permit for a
10 second, I'd like to note where the conditions have
11 occurred in the order history.

12 Because if you look at 20913-D, I
13 believe that the indication in that order is that all
14 prior conditions simply carry over, and if you look at
15 the Exhibit 1, OCD Exhibit 1, you will note that those
16 conditions actually exist in 20913-C, beginning at
17 order paragraph number nine. And so they're
18 essentially listed in the previous order, and imputed
19 through that reference in 20913-D.

20 So OCD, in terms of the conditions, is
21 really not asking for any substantive change; however,
22 I would note that with the updated template here,
23 there are some slight wording changes, so my
24 recommendation would be, if the Commission does accept
25 these conditions and apply them, to simply reiterate

1 from -- as the Commission terms it appropriate, from
2 the Exhibit with those recommended language changes,
3 but there are not substantive changes from 20913-D.
4 So I hope that helps clarify that history.

5 BY MR. TREMAINE:

6 Q Mr. Gebremichael, my last question for you
7 is that in your opinion, will the conditions outlined
8 in OCD Exhibit 1, in addition to Salt Creek's revised
9 plan, provide adequate assurance that the proposed
10 well will not cause waste or harm correlative rights,
11 in addition to protecting public health and the
12 environment, including underground sources of drinking
13 water?

14 A Yes.

15 MR. TREMAINE: Thank you. No further
16 questions.

17 CHAIRMAN FUGE: Any cross?

18 MS. HARDY: No, I don't have any
19 questions.

20 CHAIRMAN FUGE: Commissioners, any
21 questions for the OCD witness?

22 COMMISSIONER AMPOMAH: A quick one.

23 COMMISSIONER BLOOM: No, Mr. Chair.

24 COMMISSIONER AMPOMAH: So I do have a
25 quick one. I just want to ask, based on the -- from

1 this particular well that have been blocked, will the
2 NMOCD consider conducting wellbore -- analysis to --
3 reviews of each risk in the future?

4 THE WITNESS: Can you repeat the
5 question?

6 COMMISSIONER AMPOMAH: Can you hear me?

7 THE WITNESS: Now I can hear you, sir.

8 COMMISSIONER AMPOMAH: Okay. So I'm
9 just saying, my question is that with the lessons that
10 have been learned from the well that was just blocked
11 by --, I'm asking if NMOCD is going to consider a
12 wellbore -- analysis as part of some of these
13 applications, to review some of these risks in the
14 future.

15 THE WITNESS: Yes. We did have this
16 discussion with the Geolex, with Mr. David, what it
17 comes to -- the DMG, you can only minimize the risks,
18 you can not totally eliminate them. But what we
19 suggested is probably utilize the new technologies
20 called the -- managed pressure drilling, MPD.

21 OCD believes that overbalance of
22 drilling is as much of a culprit for loss of
23 circulation as the unconsolidated formations as well.
24 So we suggested them to utilize MPD drilling and the
25 response we got from them is they will give it a

1 serious consideration.

2 CHAIRMAN AMPOMAH: Thank you.

3 THE WITNESS: Thank you, sir.

4 CHAIRMAN FUGE: No questions from the
5 Chair. And after speaking with Ameredev's counsel,
6 you have no affirmative evidence or witnesses to
7 present; correct?

8 MS. BENNETT: That's correct.

9 CHAIRMAN FUGE: Okay. Fellow
10 commissioners, do we need to go into closed session to
11 deliberate?

12 COMMISSIONER BLOOM: Mr. Chair, I don't
13 feel that we need a closed session to deliberate now.

14 CHAIRMAN FUGE: Okay.

15 COMMISSIONER AMPOMAH: Yeah. And I do
16 feel that -- carry over. You know, from a -- order, I
17 guess, should be straightforward,

18 CHAIRMAN FUGE: Okay. So, looking at
19 the motion here, if I'm scratching it out and going
20 back to the notes, and we're in case 23464, if the
21 motion for approval of an alternate design proposed by
22 Salt Creek Midstream, and an amendment to 20913-D, and
23 an extension of the deadline to commence injection to
24 a date 24 months from the date of the amended order;
25 subject to the conditions proposed by OCD in their

1 Exhibit 1, so I think there's a motion to make that
2 approval and then maybe this is all wrapped up in one
3 as a result of that. If that's the motion, to deny
4 the relief requested in 23294 because it's superseded
5 by the 24 months in 23464. Can I get a motion?

6 COMMISSIONER BLOOM: Mr. Chair, I so
7 move.

8 COMMISSIONER AMPOMAH: Seconded.

9 CHAIRMAN FUGE: Seeing -- and I approve
10 the motion, so motion carries. The OCC will issue an
11 order -- OCD staff directed and in directed Commission
12 orders consistent with the words of the Commission's
13 decision.

14 Thank you, everyone. We have no
15 pending litigation updates. Walking through the next
16 item on the agenda, any other business? From either
17 commissioner? None from the Chair.

18 COMMISSIONER BLOOM: No, Mr. Chair.

19 CHAIRMAN FUGE: Our next meeting will
20 be June 8th. Notice will be going out. We do have
21 another relatively full docket, although that -- and
22 it will be in the same location, same setup, same
23 format. But there will be some lessons learned about
24 the AV. Appreciate everyone's patience with us
25 working through it.

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And with that, I adjourn the meeting.
(Whereupon, at 3:31 p.m., the
proceeding was concluded.)

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CERTIFICATE OF DEPOSITION OFFICER

I, DANA FULTON, the officer before whom the foregoing proceedings were taken, do hereby certify that any witness(es) in the foregoing proceedings, prior to testifying, were duly sworn; that the proceedings were recorded by me and thereafter reduced to typewriting by a qualified transcriptionist; that said digital audio recording of said proceedings are a true and accurate record to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



DANA FULTON
Notary Public in and for the
State of New Mexico

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I, ANDREA HINEGARDNER, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceeding, that said transcript is a true and accurate record of the proceedings to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



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[think - tremaine]

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