



Castleton Commodities International LLC
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November 17, 2020

Adrienne Sandoval
Oil Conservation Division
Division Director
1220 South St. Francis Drive
Santa Fe, NM 87505

**Remark: CCI San Juan River Plant Pathfinder AGI Well Injection Extension Request
API No. 30-045-35172
Case No. 14329; Order No. R-13201**

Dear Ms. Sandoval:

Due to economic reasons, on December 9, 2019, CCI San Juan ceased operations of the San Juan River Gas Plant and all associated compressors. Currently, the Plant is in a mothballed status and all employees have been terminated. Over the course of the next year, CCI plans to market the plant and all related equipment and facilities. Given that the San Juan River Gas plant is a treating plant, the injection well is critical infrastructure to the plant's operations and its overall marketability.

Since the plant shutdown, CCI has remained vigilant in required regulatory reporting and activities associated with the injection well including:

- Monthly C-115 reporting
- Bi-annual MIT and Bradenhead test (12-16-2019)
- Visual inspection and monthly pressure reporting to the local office (NMOCD Aztec)

By performing the above tasks, CCI has met and complied with the requirements of 19.15.26.10 NMAC-Operation and Maintenance.

As per 19.15.26.12 NMAC Commencement, Discontinuance and Abandonment of Injection Operations, Section C (2), "For good cause shown, the director may grant an administrative or extensions of injection authority as an exception to Paragraph (1) of Subsection C of 19.15.26.12 NMAC, provided that any such extension may be granted only prior to the end of one year of continuous non-injection, or during the term of a previously granted extension."

In accordance with 19.15.26.12 NMAC, CCI is hereby requesting an extension of 1 year for continuous non-injection of the Pathfinder AGI, Well API No. 30-045-35172, Order No. R-13201

and associated orders R-13201 A-C. CCI is submitting this request prior to the 1-year anniversary of the last injection on December 9, 2019.

Additionally, COVID-19 cases are on the rise and effective November 16, 2020, the Governor of New Mexico public health order states to Shelter in Place.

For the two reasons listed above, CCI respectfully requests a 1-year extension. CCI will continue to submit the monthly C-115 reports, monthly inspections and pressure checks to the respective departments of NMOCD.

The next MIT/Bradenhead tests are due in December 2021. If the plant has not transferred to another entity, CCI understands the MIT/Bradenhead tests are required to be performed.

We appreciate your attention to this matter and please let me know if you have any questions or require additional information by contacting Leann Plagens at leann.plagens@cci.com or 281-378-1257.



Brad Burmaster
Senior Vice President/Managing Director
Castleton Commodities International LLC
CCI San Juan LLC

11-17-20
Date

Cc: File
Brandon Powell, Engineering Bureau Chief
Phillip Goetze, UIC Manager, Geologist/Hydrologist