Michelle Lujan-Grisham Governor

Melanie A. Kenderdine Cabinet Secretary-Designate

Ben Shelton Deputy Secretary

Erin Taylor Deputy Secretary **Gerasimos "Gerry" Razatos** Division Director (Acting) Oil Conservation Division



<u>Notice</u> OCD Afterhours Emergency Contact Information May 12, 2025

The Oil Conservation Division ("OCD") provides these clarifications regarding contact for afterhours emergencies, reporting, and general issues during operations. OCD has assigned staff for afterhours and on-call needs. This notice describes categories of scenarios which require operators to notify OCD of events occurring outside of normal OCD office hours. The timing, procedure, and appropriate points of contact are outlined below, by category.

Normal business hours for OCD field offices are as follows:

- Monday Friday: 7:00AM to 4:00PM Mountain Standard time
- Saturday Sunday: Closed
- Holidays: Closed. see below for a list of SoNM's Observed Holidays
- Inclement Weather: Each OCD office will follow the local school district closures and delays

Below are a list of topics and the correct notification path to OCD for each topic:

Emergencies

In case of an emergency please contact the appropriate emergency response personnel first. Once the appropriate emergency response service/s have been contacted, call the emergency contact for the OCD to inform them of the emergency. Follow this process for any of the following types of emergencies:

- Any imminent threat of substantial harm to human health or the environment
- Fires
- Explosions
- Blowouts
- Major releases that affect public health, safety and environment (including normal reporting of releases to the OCD's environmental bureau)

Normal Operations

The following are items that can be reported by email <u>ocd.engineer@emnrd.nm.gov</u> and do not require an immediate phone call on <u>weekends or afterhours</u>, unless requested by the individual field inspection supervisor.

- o 24-hour notice of spud
- o 24-hour notice of running casing and cement
- o Rig moves
- o Drilling reports
- Any scheduling of OCD witnessed testing should be performed during business hours except in emergencies. If OCD is contacted after hours to schedule a non-emergency witnessed mechanical integrity test etc., the operator will be directed to contact the OCD during business hours to schedule the test.

If Casing doesn't reach the required landing depth

If casing gets stuck and cannot be circulated to depth and cannot be pulled to clean out the hole, operators should follow the following steps:

- Cement the casing string at the lowest depth possible
- Perform a CBL to ensure cement coverage
- If required formation tops were not covered due to the short setting depth contact the OCD to determine how additional separation of strata will be performed as required before moving to the next casing string or completion.

Circulation of Cement clarification

Surface and Intermediate (1) Casing Strings, OCD requires cement to circulate to surface for both the surface and intermediate 1 casing strings for all wells in New Mexico.

Production Casing and additional intermediate strings, OCD requires cement to tie back at least 200' into the prior string of casing.

- If cement fails to meet the cement circulation or coverage requirements as identified above, the Operator will need to determine the correct remedial action to meet the requirements. The Operator shall:
 - Run a cement bond log ("CBL") **The operator should not contact the OCD until after the CBL is performed.**
 - Evaluate the CBL for the top of competent cement.
 - Perform remedial work as necessary to bring cement to the surface for Surface and Intermediate (1) strings (I.E. Top down, Bradenhead squeeze).

- Perform remedial work as necessary to get at least 200' of cement tie back for any production string or subsequent intermediate strings.
- Any remedial work must ensure all formation tops are isolated.
- Submit the CBL to the OCD.
- Submit all details of remedial work on the C-103N drilling sundry.
- Note: OCD does not accept any temperature or echo meters for determining the top of competent cement coverage.
- Note: It is the operator's responsibility to ensure the type of CBL performed is adequate to properly identify the cement top in the well. If a CBL type is used that does not adequately identify the cement top the operator may subject to compliance actions.
- Note: OCD does not need to confirm CBL readings <u>after hours</u>, if the operator is confident in the CBL interpretation. However, OCD reserves the right to interpret the CBL results at a later date.
- Note: A CBL post remedial work will need to be performed to confirm cement coverage after remedial operations.

Plugging Operations

During plugging operations OCD will need to be contacted for any change from the NOI for all wells in New Mexico including State, Fee, and Federal minerals. For wells on Federal minerals, the appropriate BLM office shall be contacted first and approval must be received prior to contacting OCD, however, be advised OCD authorization is still required.

- Permission to **NOT** set certain plugs Isolation of strata
- Permission NOT to perform a CBL. Note, if an operator does not perform an OCD required CBL the operator is out of compliance. The operator, in addition to enforcement actions, may be required to drill out necessary plugs in any identified intervals needed to perform the CBL.
- Any plugs that tag more than 20' low or 50' high.
- Deviation from any condition of the OCD approved Notice of Intent.
- Fishing
- Mill outs
- Please ensure you refer to the NM PA COAs for OCD requirements for plugging and abandoning. link

On call individuals do not always have access to well files and sundries therefore the Operator shall have all necessary details and approved NOIs prior to calling OCD for reference. If the on-call OCD staff does not answer please leave a voicemail with callback information as they may be on the phone with another operator. Please allow 30 minutes between call attempts.

After hour and weekend on call numbers

North of Interstate 40, 505-320-0243 South of Interstate 40, 505-670-8745

Observed Holidays

New Year's Day Martin Luther King Jr. Birthday Memorial Day Juneteenth Independence Day Labor Day Indigenous People's Day Veterans' Day Thanksgiving Day Presidents' Day (Observed) Christmas Day

GERASIMOS RAZATOS DIRECTOR (Acting)